

**Response to Comments – Western Riverside County Regional Wastewater Authority’s
Western Riverside County Regional Wastewater Treatment Plant**

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RESPONSE TO WRITTEN COMMENTS

TENTATIVE ORDER NO. R8-2026-0001

**WASTE DISCHARGE REQUIREMENTS AND
MASTER RECYCLING PERMIT
FOR THE**

**WESTERN RIVERSIDE COUNTY REGIONAL WASTEWATER AUTHORITY
WESTERN RIVERSIDE COUNTY REGIONAL WASTEWATER TREATMENT PLANT**

#	Section	Comment	Response	Proposed Revision
Comments Received from the Western Riverside County Regional Wastewater Authority (WRCRWA)				
1	Sections VII.A. and VII.B. of Attachment F	WRCRWA recently reviewed an EPA memorandum dated August 11, 2026, titled "EPA's Initial Review of EPA Office of Water Guidance Documents," which rescinds several guidance documents, including the policy memorandum "Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs" (December 7, 2022). WRCRWA is unclear whether this rescission affects any PFAS monitoring requirements or the PFAS discussion in the Tentative Order (TO), but wanted to bring this to the Santa Ana Regional Water Board's (Regional Water Board) attention.	No change	The Santa Ana Water Board acknowledges WRCRWA's comment and the submission of the August 11, 2026, U.S. EPA Office of Water memorandum. The Santa Ana Water Board has reviewed the rescission and has determined that it does not impact or alter the proposed PFAS influent and effluent monitoring requirements in the Tentative Order (TO). Therefore, no changes have been made to the TO in response to this comment. The rationale for retaining these requirements is based on the following:

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				• Statutory Authority Remains Intact: The rescinded December 2022 document was non-binding federal guidance. Its withdrawal does not alter the underlying regulatory authority of the Santa Ana Water Board under the Clean Water Act or delegated state programs. • Independent State Authority: The proposed monitoring is established under independent state authority, specifically the California Porter-Cologne Water Quality Control Act (Water Code §§ 13267/13383). The Santa Ana Water Board retains full discretion to require monitoring to protect local water quality and beneficial uses. • Clarification on Informational Thresholds: The U.S. EPA withdrew the

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				2022 guidance primarily because it caused national confusion regarding the direct application of drinking water standards as binding numeric effluent limits in NPDES permits. While Table F-13 of the TO incorporates the State Water Board’s Division of Drinking Water (DDW) Notification and Response Levels issued on October 29, 2025, <u>these values are established in the TO solely as informational thresholds for reporting, baseline characterization, and source tracking. They do not constitute numeric effluent limits applied directly to the wastewater discharge.</u> Therefore, the EPA’s stated procedural concerns do not apply. Gathering baseline PFAS data remains critical to understanding localized wastewater loading and protecting regional water resources.

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2	Section IV.C.3. of Order	The Tentative Order states: <i>"The Discharger shall conduct periodic inspections of the facilities of the recycled water users to monitor compliance by the users with this Order."</i> WRCRWA produces recycled water but does not have direct recycled water users to inspect; therefore, WRCRWA recommends deletion of this sentence. Any agency that utilizes WRCRWA's recycled water will be responsible for ensuring use in conformance with this Order and Title 22, including inspections of its recycled water users/customers.	No change	The Santa Ana Water Board disagrees with the recommendation to delete this requirement. As the primary permittee, WRCRWA retains ultimate regulatory responsibility for the safe disposal and reuse of its treated effluent. While WRCRWA distributes recycled water through member agencies rather than directly to end-users, it cannot entirely delegate its oversight obligations. Relying solely on member agencies to inspect their own networks without producer oversight creates a regulatory gap. Periodic inspections under this Order are intended to serve as independent audits and "spot checks" to verify that the satellite program is operating properly and complying with Title 22. Therefore, the requirement remains intact to ensure proper program oversight, and no changes have been made to the TO.
3	WRCRWA Service Map in Attachment B	Replace the existing service area map in Attachment B with the updated map.	Agreed	The existing service area map will be replaced with the updated map provided by WRCRWA.

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4	Flow Schematic in Attachment C	Replace the existing flow schematic with the updated schematic.	Agreed	The existing flow schematic will be replaced with the updated flow schematic provided by WRCRWA.
5	Section IV.A.1. – Table E-4.of Attachment E	Add the following sentence to the end of Footnote 1: <i>“Turbidity measurements shall be taken immediately after filtration.”</i>	Agreed	Footnote 1 will be revised to include the additional language.
6	Section V.A.6. of Attachment E	Clarify when the first set of Species Sensitivity Screening (SSS) should be conducted. Four sets of SSS are required during the first year following reissuance of the Order, with one screening set conducted each quarter. WRCRWA requests clarification on whether the first set is required in January 2027 (when quarterly sampling is typically conducted) or during the first month the permit is effective (i.e., November 2026).	Agreed	The language in this section of Attachment E will be revised to clarify that the first set of SSS shall be conducted during the first full quarter sample collection period following the effective date of this Order.
7	Section VII.A.1. – Table E-5 of Attachment E	Add a turbidity footnote in Table E-5 clarifying that turbidity samples shall be collected at monitoring location M-001.	Agreed	Table E-5 will be modified by including the additional footnote.

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8	Section II.C.1.a – Table F-5 of Attachment F	Bis(2-ethylhexyl) phthalate and mercury have repeated numbers in the Average Monthly column that need to be deleted.	Agreed	The repeated numbers will be deleted from the table.
9	Section B.2.j.i. of Attachment K	Clarification is needed on when storm water sampling results for all individual or Qualified Combined Samples should be submitted. Historically, and in WRCRWA’s existing permit, all storm water sample results for the reporting year were included in the annual report. WRCRWA seeks clarification on whether an ad hoc storm water report will be added to CIWQS to meet this requirement, or whether the Regional Water Board expects WRCRWA to submit results within 30 days via email.	Agreed	The language will be modified to clarify that all storm water sample results for the reporting year shall be included in the annual report.

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10	Section B.2.j.iii – Table 1 of Attachment K	Clarification is needed regarding the applicable pH limits. Table 1 shows proposed limits between 6.5–8.5, whereas WRCRWA’s current permit and the Statewide Industrial Permit specify pH limits of 6–9.	No change	The Santa Ana Water Board disagrees with the request to relax the pH limits. As specified in Chapter 4 of the Santa Ana Water Board’s Basin Plan (https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/index.html), the pH of inland surface waters must not be raised above 8.5 or depressed below 6.5 due to controllable water quality factors. While the Statewide Industrial General Permit uses a broader technology-based range of 6.0–9.0, this individual Order must implement the more stringent, region-specific water quality objectives to protect local receiving waters. Therefore, no changes have been made to the TO.
11	Section B.3.b. of Attachment K	WRCRWA stated that its current Industrial Storm Water permit allows discharges not yet meeting Level 1 status to use litmus pH paper for monitoring, whereas Attachment K excludes this method.	No change	The Discharger should utilize the same standard pH testing methodologies used for other routine compliance measurements (e.g., effluent, recycled water, or receiving water monitoring) to maintain consistency with its established sampling and analytical practices.

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		WRCRWA is concerned that 40 CFR 136 requires laboratory analysis within 15 minutes, which presents logistical challenges. WRCRWA also noted that maintaining a calibrated pH meter is labor-intensive and prone to error. Therefore, WRCRWA requests flexibility to use litmus pH paper as an initial screening tool, followed by pH testing using approved 40 CFR 136 methods or a calibrated portable pH instrument in subsequent years if necessary.		Litmus pH paper lacks the precision required for regulatory reporting and shall not be used for pH determinations under Attachment K of this Order. Therefore, no changes have been made to the TO.

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Comments Received from the Pala Band of Mission Indians				
1	N/A	The Pala Band of Mission Indians reviewed their mapping and determined that the Western Riverside County Regional Wastewater Treatment Plant is located outside the boundaries of the Pala Indian Reservation. The Tribe noted, however, that the facility is situated within or near their Traditional Use Area (TUA), and that information generated by the project would likely be useful in better understanding regional culture and history. While the Tribe has declined Assembly Bill 52 (AB 52) consultation at this time, they do not waive their right to request consultation under other applicable laws in the future.	Comment noted	No changes to the Order are needed.

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#	Section	Comment	Response	Proposed Revision
Comments Received from the Agua Caliente Band of Cahuilla Indians (ACBCI)				
1	N/A	The ACBCI stated that while the Western Riverside County Regional Wastewater Treatment Plant is located outside the boundaries of the ACBCI Reservation, it does fall within the Tribe’s TUA. Because the proposed action lacks the potential to affect cultural resources, the Tribe has no concerns regarding this project at this time.	Comment noted	No changes to the Order are needed.

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#	Section	Comment	Response	Proposed Revision
Comments Received from the Yuhaaviatam of San Manuel Nation (YSMN, also known as the San Manuel Band of Mission Indians)				
1	N/A	The YSMN submitted an email stating that the Western Riverside County Regional Wastewater Treatment Plant is located within Serrano ancestral territory and is therefore of cultural interest to the Tribe. The Tribe inquired whether the permit renewal involves any new development or if it is strictly limited to the discharge of treated effluent in the identified areas.	Staff responded by explaining that the TO regulates non-potable recycled water reuse to substitute for potable water within the identified project boundaries. The recycled water will be applied via a phased approach, beginning strictly within already developed areas. Because long-term applications are subject to change, it is currently unknown if reuse will extend to new developments in future phases. No additional comments or responses were received from YSMN.	Comment noted; no changes to the Order are needed.