CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

DRAFT WASTE DISCHARGE REQUIREMENTS ORDER NO. R3-2016-0007

Waste Discharger Identification No. 3421015001

FOR

DUNN SCHOOL
WASTEWATER TREATMENT SYSTEMS
SANTA BARBARA COUNTY

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) finds:

SITE/FACILITY OWNER AND LOCATION

1. Dunn School, a California corporation, operates a 32-acre private facility with 29 faculty residences, student residences (up to 110 students), common area restrooms, campus kitchen (with a commercial dishwashing machine), and dining hall located at 2555 West Highway 154, in Los Olivos, Santa Barbara County.

2. The facilities and system are on a 32-acre lot in Section 25, T7N, R31 W, SB B&M, as shown on Attachment "A" of this order.

PURPOSE OF ORDER

3. This Order prescribes waste discharge requirements for Dunn School (hereafter "Discharger"). The Discharger filed a complete Report of Waste Discharge, received on November 10, 2015, in accordance with Section 13260 of the California Water Code. The report was filed on behalf of the Discharger for authorization to discharge within the Los Olivos Hydrologic Unit (No. 314.40) and over the Santa Ynez River Valley groundwater basin (No. 3-15).

4. On September 28, 2015, Dunn School submitted an updated report of waste discharge (ROWD). The updated ROWD describes changes to onsite wastewater treatment systems that have been upgraded since the Central Coast Water Board adopted Dunn School's waste discharge requirements Order No. 99-61. The information supports a request for increased flow and document that the existing systems have the capacity to treat the proposed increased flows.

5. On November 10, 2015, the Dunn School submitted an addendum to the ROWD including updated recirculating sand filter system and a package treatment system design information.

6. This is an existing facility. Dunn School has replaced 14 of 30 septic systems with two additional treatment systems, a recirculating sand filter system that replaces three

septic systems, and a package treatment system (AdvanTex) that replaces eleven septic systems. Sixteen septic systems are still in service.

7. The existing waste discharge requirements are being revised to address the new treatment and disposal field (AdvanTex package treatment system with distribution to dry wells and a Geoflow dispersal field). The Discharger was previously regulated under Waste Discharge Requirements Order No. 99-61, adopted by the Board on July 9, 1999. The Board has regulated this discharge since 1991.

SITE/FACILITY DESCRIPTION

8. **Facility** – Dunn School discharges treated wastewater to the Santa Ynez groundwater sub-basin, in Santa Barbara County. The combined average daily flow of treated domestic wastewater is 36,000 gallons per day (gpd).

   The Discharger owns and operates a recirculating sand filter system with dispersal field, an Orenco system (AdvanTex package treatment) with force main distribution to dry wells and a dispersal field, and 16 septic tanks using leach fields or dry wells for disposal.

   The treatment and disposal systems are at multiple locations across the 32-acre site, as shown on Attachment "B" of this order.

9. **Discharge Type -** Influent flow to the 16 conventional septic systems includes sanitary wastewater. Also, Dunn School conducts chemistry classes that include laboratory activities. Chemicals from its science labs are disposed of in accordance with hazardous waste collection programs of the County of Santa Barbara's Resource Recovery & Waste Management Division, Public Works Department. Some chemicals are periodically disposed of to the laboratory sinks, which discharge into the septic tank serving the building. The discharges result from washing laboratory equipment in the laboratory sinks.

   Influent flow to the recirculating sand filter system includes sanitary wastewater.

   Influent flow to the AdvanTex package treatment system includes a cafeteria kitchen and sanitary wastewater.

10. **Design and Current Capacity –**

    a) Sixteen conventional septic systems service individual residences and some classrooms. The combined flow rate for these systems is approximately 13,000 gpd. The tanks vary in size from 500 to 5,000 gallons. The tanks discharge to both leach fields and dry wells (28 separate dry wells).

    b) A recirculating sand filter system biologically treats approximately 3,000 gallons per day. The system has a design flow of 6,000 gallons per day. The system includes four septic tanks (see Attachment B). Tank 23 is a 5,000-gallon tank that receives raw wastewater. Tank 23 pumps raw wastewater to tank 25. Tank 25 is a 6,000-gallon tank that receives raw wastewater. Tank 26A is a 6,000-gallon tank that receives settled wastewater from tank 25 and treated wastewater from the sand filter. Tank 26A also functions as a recirculation tank. Tank 26B is a 1,500-gallon tank

used for dosing by force main the treated wastewater to a dispersal field. This system has a high-water alarm on Tank 23 and alarms on Tanks 26A and 26B monitored by a contract service provider.

c) An Orenco system (AdvanTex package treatment) biologically treats approximately 6,000-15,000 gallons per day. The system has a design flow of 36,000 gallons per day. The system has three primary influent tanks (two at 25,000 gallons and one at 30,000 gallons), three influent aeration treatment tanks (10,000 gallons each tank, one AXMAX 300 unit, one AXMAX 225 unit and one AXMAX 287 unit) with recirculation, one dosing tank (25,000 gallons) with distribution to dry wells and a Geoflow dispersal field. There is also a grease interceptor serving building 17. This system has a low flow alarm and a low dispersal tank volume alarm that are monitored by a contract service provider.

11. **Collection System –** Most septic tanks service individual buildings, except tanks 11 and 13 that collect flow from three buildings each and tanks 12, 15, and 19 that collect flow from two buildings each. The recirculating sand filter system collects flow from six buildings. The AdvanTex package treatment collects flow from 12 buildings.

12. **Wastewater Disposal –** For all septic tanks, the recirculating sand filter system, and the AdvanTex package treatment system, treated wastewater is disposed of by percolation. Percolation systems include leachfields, seepage pits, and Geoflow shallow subsurface-drip.

13. **Solid Waste Disposal -** Biosolids and sludge are pumped from septic tanks, holding tanks, and primary influent tanks and hauled to a facility approved to receive septage.

14. **Recycling -** No recycling.

15. **Geology -** The drywells, leachfields, and Geoflow dispersal system are located on gently sloping topography consisting of silty sands and gravelly silty clays.

16. **Groundwater –**

a) Dunn School discharges to ground in the Santa Ynez groundwater sub-basin.

b) Depth to groundwater as measured in on-site borings is greater than 60 feet below the ground surface. The highest documented level is 56 feet below the ground surface. Groundwater beneath the site flows generally to the southeast; however, groundwater gradient in the greater Santa Ynez River Valley is to the southwest[1].

c) The closest downgradient groundwater well is approximately 1000 feet to the southeast of the lacrosse field disposal site.

[1] Source – Ground-Water Quality in the Santa Rita, Buellton, and Los Olivos Hydrologic Subareas of the Santa Ynez River Basin, Santa Barbara County, California, U.S. Geological Survey, Water-Resources Investigations Report 84-4131

d) In November 2005, Santa Barbara Environmental Health Services issued a Domestic Water Supply Permit for the Skyline Park Water & Service. The wells for this system are approximately 5.5 miles downgradient of Dunn School.

e) Well #2 for this water supply system was constructed in 1951. It has a 12-inch steel casing set at 250 feet with the first perforations located at 80 feet. The well is capable of producing between 270 to 300 GPM. This is the primary source of domestic water for the subdivision. Well #2 is downgradient of the Dunn School discharge and the well water has the following characteristics:

Table 1 - Groundwater Quality Well #2 Skyline Park Water & Service

Constituent	Range	Average
Total Dissolved Solids	---- mg/L*	800 mg/L
Sodium	---- mg/L*	46 mg/L
Chloride	---- mg/L*	120 mg/L
Nitrate (as N)	7.2-8.3 mg/L**	7.6 mg/L
pH	---- pH units*	7.3 pH units

*= one sample
**= 13 years of sampling, 15 samples

Well #3 was constructed in 1991 to a depth of 520 feet with a 50-foot annular seal. A 12-inch steel casing extends to 400 feet, with the depth of the first perforation located at 120 feet. A 25-horsepower submersible pump is set at a depth of 300 feet and is capable of producing 275 gallons per minute (gpm). This well is currently used as a backup to Well #2. Well #3 is downgradient of the discharge and the well water has the following characteristics:

Table 2 - Groundwater Quality Well #3 Skyline Park Water & Service

Constituent	Range	Average
Total Dissolved Solids	627-890 mg/L[a]	765 mg/L
Sodium	43-56 mg/L[a]	51 mg/L
Chloride	59-120 mg/L[a]	97 mg/L
Nitrate (as N)	5.4-8.7 mg/L[b]	7.0 mg/L
pH	7.3-7.9 pH units[a]	7.6 pH units

a = 20 years of sampling, five samples
b = 20 years of sampling, 20 samples

f) The Dunn School is located in the Santa Ynez River Water Conservation District Improvement District No. 1 service area. Santa Ynez River Water Conservation District pumps groundwater from 19 active wells ranging in depth from 500 to over 1300 feet. Groundwater from 19 active wells has the following characteristics (2013 Annual Water Quality Report):

Table 3 - Groundwater Quality Santa Ynez River Water Conservation District Improvement District No. 1 Service Area

Constituent	Range	Average
Total Dissolved Solids	440-730 mg/L	559 mg/L
Sodium	34-51 mg/L	41 mg/L
Chloride	35-56 mg/L	42 mg/L
Nitrate + Nitrate (as N)	ND-3.4 mg/L	1.6 mg/L
pH	7.5-8.1 pH units	7.6 pH units

g) Groundwater downgradient of the discharge taken from Well No. 7N/31 W 36 G4 on June 8, 1980, had the following characteristics:

Table 4 - Groundwater Quality Well No. 7N/31 W 36 G4

Constituent	Result
Total Dissolved Solids	634 mg/L
Sodium	39 mg/L
Chloride	56 mg/L
Nitrate + Nitrate (as N)	3.3 mg/L
pH	7.3 pH units

There are no groundwater wells on site. The Discharger shall submit to the executive officer for review and approval, a plan for monitoring groundwater underlying all disposal areas. Additionally, consistent with a proposed time schedule, influent from septic tanks and the recirculating sand filter is being redirected to the AdvanTex treatment system. Enhanced treatment using the AdvanTex treatment system will reduce nitrogen loads discharged on the site.

17. **Surface Water -** Alamo Pintado Creek is located approximately 1,800 feet west of the site and flows in a southerly direction. The Central Coast Ambient Monitoring Program collected one sample in 2002 (creek sample station approximately 0.8 mile above Figueroa Mountain Rd) and the surface water had the following characteristics:

Table 4 – Surface Water Quality Alamo Pintado Creek

Constituent	Result
Total Dissolved Solids	No Data
Sodium	40 mg/L
Chloride	16 mg/L
Nitrate (as N)	0.01 mg/L
pH	8.5 pH units

There are no surface waters on the site.

18. **Land Uses -** In the vicinity of the discharge, land is used for housing, school buildings, open areas (e.g., grassed yards) and sport fields (e.g. lacrosse field, baseball field, practice field, etc.).

CHANGES TO ORDER

19. Changes to Order 99-61 include:
    - Average Daily Flow - increase from 33,450 to 36,000 gpd
    - New effluent limits for Biochemical Oxygen Demand, 5-Day, Total Suspended Solids, and Total Nitrogen (as N)
    - Additional treatment - AdvanTex treatment system
    - Time schedule order to connect influent from remaining septic tanks and recirculating sand filter to the AdvanTex treatment system

BASIN PLAN

20. The Central Coast Water Board has adopted the *Water Quality Control Plan for the Central Coast Basin* (Basin Plan), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for receiving waters within the Region.

21. Beneficial uses of groundwater near the discharge include:
    a. Municipal and Domestic Water
    b. Agricultural Water Supply
    c. Industrial Water Supply

    Existing groundwater quality objectives in the Santa Ynez sub-basin are:

Table 5 - Groundwater Quality Objectives for Santa Ynez Sub- basin (3-15)

TDS	Nitrate	Sodium	Chloride	Sulfate	Boron
600	1 mg/L	20 mg/L	50 mg/L	10	0.5

22. Present and anticipated beneficial uses of the Alamo Pintado Creek include:

    a. Municipal and Domestic Supply
    b. Agricultural Supply
    c. Industrial Process Supply
    d. Groundwater Recharge
    e. Water Contact Recreation
    f. Non-Contact Water Recreation
    g. Wildlife Habitat
    h. Warm Freshwater Habitat
    i. Commercial and Sport Fishing

    Existing surface water quality objectives for the listed beneficial uses are found in Chapter 3 of the Basin Plan. The Basin Plan can be reviewed at:

    http://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/index.shtml

RECYCLED WATER POLICY

23. The State Water Resources Control Board adopted the Recycled Water Policy on February 3, 2009.

24. It is the intent of the Recycled Water Policy that salts and nutrients from all sources be managed on a basin-wide or watershed-wide basis in a manner that ensures attainment of water quality objectives and protection of beneficial uses. The State Water Board found that the appropriate way to address salt and nutrient management is through developing regional or subregional salt and nutrient management plans rather than through imposing requirements solely on individual projects.

25. The Central Coast Water Board finds that a combination of regional management plans and individual or programmatic project requirements may be necessary to protect beneficial uses.

26. The Recycled Water Policy calls for the development of locally driven and controlled collaborative processes open to all stakeholders that will prepare salt and nutrient management plans for each basin/sub-basin in California.

27. A large number of technical reports and data contained within Central Coast Water Board files document widespread and increasing salt and nutrient impacts within the groundwater basins throughout the Central Coast Region, including the Santa Ynez Groundwater Basin.

28. Dunn School is not involved in the development of the Salt and Nutrient Management Plan (SNMP) for the Santa Ynez Groundwater Basin. Dunn School shall prepare an analysis of salts and nutrients and management practices to address salts and nutrients to be implemented consistent with Section G. Provisions of this Order.

ANTIDEGRADATION

29. State Water Board Resolution No. 68-16 (*Statement of Policy with Respect to Maintaining High Quality of Waters in California*) requires regional water quality control boards, in regulating discharges of waste, to maintain high quality waters of the State unless it is demonstrated that any change in quality will be consistent with the maximum benefit to the people of the State, will not unreasonably affect beneficial uses, and will not result in water quality less than that described in a regional water quality control board's policies (i.e., quality that exceeds applicable water quality standards). Resolution No. 68-16 also states, in part:

> *Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in best practicable treatment and control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.*

The discharge regulated by this Order is subject to waste discharge requirements that will result in treatment, control, prevention of pollution and nuisance, and maintenance of water quality consistent with maximum benefit to the people of the State. As such, these waste discharge requirements are consistent with the provisions of Resolution No. 68-16.

This Order requires best practicable treatment or control, which will ensure that pollution or nuisance will not occur. The facility is required to meet effluent limitations identified in Section B of this order.

The Monitoring and Reporting Program of this Order requires the Discharger to collect representative samples to ensure compliance with effluent limitations and water quality objectives of the receiving water.

30. Dunn School decommissioned 11 septic systems and redirected the wastewater to an AdvanTex package treatment system to improve operations and conventional pollutant effluent quality.

31. The AdvanTex package treatment system is operated to reduce nitrogen concentrations and loading to groundwater.

ENVIRONMENTAL SUMMARY

32. The County of Santa Barbara approved a Negative Declaration for the expansion project in accordance with the California Environmental Quality Act (Public Resources Code, Section 21000, et seq.) and the California Code of Regulations. The Initial Study determined there are no significant adverse environmental effects or that all potentially significant adverse effects can be avoided through implementation of mitigation measures. This Order implements mitigation measures to prevent nuisance and ensure protection of beneficial uses of surface and groundwater.

TOTAL MAXIMUM DAILY LOAD

33. Total maximum daily load (TMDL) allocations are being developed for impaired surface waters in the Santa Ynez River Basin. TMDL documents will allocate responsibility for pollutant loading throughout the watershed or applicable sub-watersheds. If the TMDLs determine pollutant contributions from waste discharged may adversely impact beneficial uses or exceed water quality objectives, changes in these waste discharge requirements may be required. Waste discharge requirements may be modified to implement applicable TMDL provisions and recommendations.

34. Dunn School's estimated average nitrogen loading to the Santa Ynez groundwater sub-basin is 205 pounds per acre per year.

Calculation 1:

Average Flow	Average Total Nitrogen Concentration	Conversion Factor	Conversion Factor	Total Nitrogen Load per Day
34,000 gal/day X	64 mg/Liter X	$2.2X10^{-6}$ lbs/mg	X 3.785 Liter/gal	= 18 lbs per day

Calculation 2:

Total Nitrogen Load per Day	Conversion Factor	Facility Size	Total Nitrogen Load per Pounds per Acre per Year
(18 lbs/day	X 365 day/year) /	32 acres	= 205 lbs/year/acre

EXISTING ORDERS AND GENERAL FINDINGS

35. The Discharger is currently regulated under Waste Discharge Requirements Order No. 99-61, adopted by the Board on July 9, 1999. The Board has regulated this discharge since 1991.

36. Discharge to the waters of the State is a privilege, not a right, and authorization to discharge is conditional upon the discharge's complying with provisions of Division 7 of the California Water Code and any more stringent effluent limitations necessary to implement water quality control plans, to protect beneficial uses, and to prevent nuisance. Compliance with this Order should ensure this and mitigate any potential adverse changes in water quality due to the discharge.

37. On March 8, 2016, the Board notified the Discharger and interested agencies and persons of its intent to issue waste discharge requirements for the discharge and has provided them with a copy of the proposed order and an opportunity to submit written views and comments.

38. After considering all comments pertaining to this discharge during a public hearing on July 28, 2016, this Order was found consistent with the above findings.

THEREFORE, IT IS HEREBY ORDERED that, pursuant to authority in the California Water Code, Division 7, including Sections 13263, 13267, and 13523, Dunn School and its agents and successors, shall comply with the following:

Order No. R3-2016-0007, with MRP No. R3-2016-0007, is effective as of the date signed, and, in order to meet the provisions contained in division 7 of the Water Code (commencing with section 13000), the Dunn School shall comply with the requirements in this Order.

All technical and monitoring reports submitted pursuant to this Order are required pursuant to Section 13267 of the California Water Code. Failure to submit reports in accordance with schedules established by this Order or attachments to this Order, or failure to submit a report of sufficient technical quality to be acceptable to the Executive Officer, may subject the

Discharger to enforcement action pursuant to Section 13268 of the California Water Code.

(Note: General permit conditions, definitions and the method of determining compliance are contained in the attached "Standard Provisions and Reporting Requirements for Waste Discharge Requirements," dated December 2013, referenced in paragraph F.3. of this Order.)

These requirements are superscripted to indicate the source of requirements. Requirement superscripts are as follows:

ROWD = Report of Waste Discharge
CWC = California Water Code
BP = Basin Plan
T22 = California Code of Regulations, Title 22, Recycled Water Criteria
DPH = State Department of Public Health

Requirements without superscripts are based on staff's professional judgment.

A. PROHIBITIONS

1. Discharge to areas other than disposal areas shown in Attachment B is prohibited.[CWC]

2. Discharge of any wastes including overflow, bypass seepage, overspray and runoff from transport, treatment, or disposal systems to adjacent properties, adjacent drainage ways, or to waterways is prohibited.[CWC]

3. Discharge of untreated or partially treated wastewater is prohibited.[CWC]

4. Bypass of the treatment systems (septic tanks, sand filter, AdvanTex) and discharge of untreated or partially treated wastes directly to the subsurface disposal area is prohibited.

5. Discharge of wastes other than domestic wastewater and wash water generated in the chemistry laboratories is prohibited.

6. Discharge of wastes other than those described in the findings of this Order is prohibited.[CWC]

7. Discharge or storage of waste in a manner promoting nuisance and vector development is prohibited.

8. Discharge of any wastewater within 100 feet of any domestic, agricultural, industrial or commercial water supply well is prohibited.

B. EFFLUENT LIMITATIONS

1. Daily flow averaged over each month shall not exceed 36,000 gallons per day.[ROWD]

2. Effluent discharged from the sand filter treatment facility and the AdvanTex treatment facility to disposal systems shall not exceed the following limitations:

Table 2 – AdvanTex Aeration Treatment Unit Effluent Limitations

Constituent	Units	Monthly Average (30-day)	Daily Maximum
Biochemical Oxygen Demand, 5-Day	mg/L	30	100
Total Suspended Solids	mg/L	30	100
Total Nitrogen (as N)	mg/L	---	10[a]
		Range	
pH	units	less than 6.5 or greater than 8.4[BP]	

a – This effluent limit applies upon approval and implementation of the Dunn School nitrogen reduction plan.

C. GROUNDWATER LIMITATIONS

(Receiving water quality is a result of many factors, some unrelated to the discharge. This permit considers these factors and is designed to minimize the influence of the discharge to receiving waters.)

1. The discharge shall not cause groundwater to contain taste- or odor-producing substances in concentrations that adversely affect beneficial uses. [BP]

2. The discharge shall not cause radionuclides to be present in concentrations that are deleterious to human, plant, animal, or aquatic life or result in the accumulation of radionuclides in the food web to an extent which presents a hazard to human, plant, animal, or aquatic life. [BP]

3. The discharge shall not cause groundwater to contain concentrations of organic or inorganic chemicals in excess of the limiting concentrations set forth in California Code of Regulations, Title 22, Division 4, Chapter 15, Article 5.5, Section 64444 (organic) and Article 4, Section 64431 (inorganic). [BP]

4. The discharge shall not cause groundwater to contain concentrations of chemical pollutants in amounts that adversely affect the agricultural supply beneficial use. Interpretation of adverse effects shall be as described in University of California Agricultural Extension Service guidelines provided in Table 3-3 of the Central Coast Basin Plan. [BP]

5. The discharge shall not cause a significant increase in mineral constituent concentrations in underlying groundwater, as determined by comparison of samples collected from wells located upgradient and downgradient of the disposal area.[BP]

6. The discharge shall not cause underlying groundwater to contain concentrations of constituents in excess of water quality objectives listed in Table 3-8 of the Basin Plan.

D. SYSTEM OPERATIONS SPECIFICATIONS (eg. standby power, backup pumps, alarms, etc.)

1. For septic tanks without access structures, risers and manholes shall be installed over the tank inspection ports and access ports.

2. The Discharger shall provide backup pumps to ensure reliability of the pressure disposal and recirculating sand filter systems.

3. The Discharger shall provide backup pumps to ensure reliability of the AdvanTex treatment system.

4. The Discharger shall maintain a high water alarm on Tank 23 and pump service alarms on Tanks 26A and 26B that are monitored by a contract service provider.

5. The Discharger shall maintain a low-flow alarm and a low-dispersal tank volume alarm on the AdvanTex treatment system that are monitored by a contract service provider.

E. SOLIDS/SOLID WASTE CONTROL (BIOSOLIDS)

Biosolids refers to non-hazardous sewage sludge as defined in 40 CFR 503.9. Biosolids that are hazardous (as defined in 40 CFR 261) must be disposed of in accordance with requirements of the Resource Conservation Recovery Act (RCRA). Sludge with PCB levels in excess of 50 mg/kg must be disposed in accordance with 40 CFR 761.

1. All biosolids generated by the Discharger shall be used or disposed of in compliance with the applicable portions of the following regulations:

   a) 40 CFR 503 - for biosolids that are land applied, placed in surface disposal sites (dedicated land disposal sites or monofills), or incinerated.

   b) 40 CFR 258 - for biosolids disposed of in municipal solid waste landfills.

   c) 40 CFR 257 - for all biosolids use and disposal practices not covered under 40 CFR 258 or 503).

   d) 40 CFR 503 Subpart B (land application) applies to biosolids applied for the purpose of enhancing plant growth or for land reclamation. Section 503 Subpart C (surface disposal) applies to biosolids placed on the land for the purpose of disposal.

The Discharger is responsible for ensuring that all biosolids produced at its facility are used or disposed of in accordance with these rules, whether the Discharger uses or disposes of the biosolids itself or transfers them to another party for further treatment, use, or disposal.

F. DISPOSAL AREA SPECIFICATIONS

1. Discharge of process wastewater shall not occur within 100 feet of any water well.[BP]

2. The treatment, storage, and disposal facilities shall be managed to exclude the public and posted to warn the public of the presence of wastewater.

3. Sub-surface application of wastewater to the lacrosse field shall be at rates which are reasonable for the crop, soil, climate, management system, and condition of waste.

4. Wastewater application shall be managed to minimize percolation to groundwater.

5. Extraneous surface drainage shall be diverted from the disposal areas. [BP]

6. Seepage pits/dry wells shall have at least 15 feet of separation between the pit bottom and highest usable groundwater, including perched groundwater. [BP]

7. Waste chemicals generated in the school's science laboratories shall be disposed of in accordance with the hazardous waste collection programs of the County of Santa Barbara's Resource Recovery & Waste Management Division, Public Works Department.

G. PROVISIONS

1. Groundwater Monitoring:

   a) By **September 30, 2017**, the Discharger shall submit to the executive officer for review and approval, a plan for monitoring groundwater underlying all disposal areas. The proposed groundwater monitoring system shall be a hydrogeologically accurate system capable of determining the discharge's impacts to underlying groundwater quality and elevations. At a minimum the proposed groundwater monitoring system shall:
      - Determine depth to groundwater.
      - Determine the direction of groundwater flow.
      - Determine the appropriate location and depth for upgradient and downgradient wells.
      - Include a timeline for well installation and monitoring.

      All monitoring wells shall meet or exceed well standards contained in the Department of Water Resources Bulletins 84-81 and 74-90. The Discharger shall also comply with the monitoring well reporting provisions of Sections 13750 through 13755 of the California Water Code.

   b) For groundwater monitoring system installation the Discharger shall:

      - Receive approval from the executive officer to install and use the groundwater monitoring system described in the Groundwater Monitoring System Plan,
      - Install the groundwater monitoring system described in the Groundwater Monitoring System Plan in accordance with a schedule approved by the executive officer, and
      - Submit a report in accordance with a schedule approved by the executive officer verifying the groundwater monitoring system's hydrogeological accuracy and containing statistically reliable existing water quality data.

Salt and Nutrient Management

The Discharger shall maintain an ongoing salt and nutrient management program with the intent of reducing mass loading of salts and nutrients (with an emphasis on nitrogen species) in treated effluent to a level that will ensure compliance with effluent limitations and protect beneficial uses of groundwater.

1. Salt Management Program:

    - Salt reduction measures shall focus on all potential salt contributors to the collection system, including water supply, commercial, industrial and residential dischargers. The salt management program shall also address the concentration of salts in the wastewater treatment process as a result of excessive hydraulic retention times and/or chemical addition.

    - The Discharger shall submit an annual report of salt reduction efforts. This salt management report shall be included as part of the annual report described in Monitoring and Reporting Program No. R3-2016-0007. The first report shall be submitted by **January 30, 2018.** Reports shall include (at a minimum):

        a. Calculations of annual salt mass discharged to (influent) and from (effluent) the wastewater treatment facility with an accompanying analysis of contributing sources;
        b. Analysis of wastewater evaporation/salt concentration effects;
        c. Analysis of groundwater monitoring results related to salt constituents;
        d. Analysis of potential impacts of salt loading on the groundwater basin;
        e. A summary of existing salt reduction measures; and,
        f. Recommendations and time schedules for implementation of any additional salt reduction measures.

2. Nutrient Management Program:

    - Nutrient reduction measures shall focus on optimizing wastewater treatment processes for nitrification and denitrification, or other means of nitrogen removal. Reduction measures may also include source control (non-human waste from commercial and industrial sources) as appropriate.

    - The Discharger shall submit an annual report of nutrient reduction efforts. This nutrient management report shall be included as part of the annual report described in Monitoring and Reporting Program No. R3-2016-0007. The first report shall be submitted by **January 30, 2018.** Reports shall include (at a minimum):

        a. Calculations of annual nitrogen mass (for all identified species) discharged to (influent) and from (effluent) the wastewater treatment facility with an accompanying analysis of contributing sources;
        b. Analysis of wastewater treatment facility ability to facilitate nitrification and denitrification, or other means of nitrogen removal;
        c. Analysis of groundwater monitoring results related to nitrogen constituents;
        d. Analysis of potential impacts of nitrogen loading on the groundwater

basin;
e. A summary of existing nitrogen loading reduction measures; and,
f. Recommendations and time schedules for implementation of any additional nitrogen loading reduction measures.

3. The requirements prescribed by this Order (No. R3-2016-0007) supersede requirements prescribed by Order No. 99-61, adopted by the Regional Board on July 9, 1999. Order No. 99-61, Waste Discharge Requirements for the Dunn School, Santa Barbara County, is hereby rescinded except for enforcement purposes.

4. The Discharger shall comply with Monitoring and Reporting Program No. R3-2016-0007, as specified by the executive officer.

5. The Discharger shall comply with all items of the attached "Standard Provisions and Reporting Requirements for Waste Discharge Requirements" dated December 2013.

6. A copy of this Order, the MRP, and Standard Provisions shall be kept at the discharge facility for reference by operating personnel. Key operating and site management personnel shall be familiar with their content.

7. The Discharger shall operate and maintain all wastewater facilities in accordance with an Operations Manual for the treatment facility that is subject to the approval of the executive Officer. The Operations Manual, including a copy of as-built plans, shall be kept on site and periodically updated whenever there is a change in operational procedures or an expansion of the system.

8. The discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) to achieve compliance with this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with this Order.

9. Wastewater treatment system repairs and expansions shall be made in accordance with this Board's Basin Plan.

10. The discharger shall take all reasonable steps to prevent any discharge in violation of this Order.

11. The discharger shall furnish the Water Board, within a reasonable time, any information that the Board may request to determine compliance with this Order.

12. The discharger shall allow the Water Board or its authorized representatives to:

    a. Enter upon the discharger's premises where a regulated facility or activity is located or conducted, or where records pertinent to this permit are kept;
    b. Inspect and photograph any facilities, equipment (including monitoring and control equipment), practices, or operations pertinent to this Order;
    c. Have access to and copy any records pertinent to this permit; and
    d. Sample or monitor for the purposes of assuring permit compliance.

13. All reports or other documents required by this Order, and other information requested by the Water Board shall be signed by a person described below or by a duly authorized representative of that person.

    a. For a corporation: by a responsible corporate officer such as: (a) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function; (b) any other person who performs similar policy or decision-making functions for the corporation; or (c) the manager of one or more manufacturing, production, or operating facilities if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
    b. For a partnership or sole proprietorship: by a general partner or the proprietor.

14. Any person signing a document under Provision 11 makes the following certification, whether written or implied:

    "I certify under penalty of law this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

15. In the event of any change in control or ownership of land or waste discharge facilities presently owned or controlled by the discharger, the discharger shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to the executive officer.

16. Pursuant to Title 23, Chapter 3, Subchapter 9, of the California Code of Regulations, the Discharger must submit a written report to the Executive Officer not later than **November 30, 2020,** addressing:

    a) Whether there has been, or will be, any changes in the continuity, character, location, or volume of the discharge;

    b) Whether there has been, or will be, any changes to the treatment or disposal processes and operations; and,

    c) Whether, in their opinion, there is any portion of the Order that is incorrect, obsolete, or otherwise in need of revision.

17. Violations of these General WDRs may result in enforcement actions as authorized under the California Water Code.

18. This Order does not authorize commission of any act causing injury to the property of another, does not convey any property rights of any sort, and does not remove liability under federal, state, or local laws.

19. Requirements of this Order are severable. If any requirement of the Order is found invalid, the remainder of the Order shall not be affected.

20. The Water Board may review this Order at any time and may modify or terminate this Order as appropriate.

H. MONITORING AND REPORTING PROGRAM

1. Monitoring and Reporting Program (MRP) No. R3-2016-0007 is a part of this Order. The Monitoring Program requires influent, effluent, and receiving water (groundwater) sampling and analysis to verify compliance with this Order.

2. Monitoring reports are due quarterly, January 30th, April 30th, July 30th, and October 30th. An annual report summarizing the year's events and monitoring is due in January 30th of each year.

3. Reports (both technical and monitoring reports), shall be submitted electronically to the State Water Board's GeoTracker database over the Internet. Analytical data (influent, effluent, surface water, and groundwater data) shall be uploaded in electronic data format to the GeoTracker database under a site-specific global identification number. Information on the GeoTracker database is available at:

   http://www.waterboards.ca.gov/ust/electronic_submittal/index.shtml

4. The Executive Officer may review the MRP at any time and may modify or terminate the MRP as appropriate.

I. TIME SCHEDULE

1. Dunn School shall terminate use of remaining septic tanks and recirculating sand filter and redirect influent from those systems to the AdvanTex treatment system according to the following time schedule:

Septic Tank Number	Date for Completion
27, 28, 29	December 2018
23, 25, 26A, 26B	December 2020
11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 24,	Connection during construction of facilities detailed in the Dunn School Facilities Master Plan

J. ENFORCEMENT

1. The requirements of this Order are subject to enforcement under Water Code sections 13261, 13263, 13264, 13265, 13268, 13350, 13300, 13301, 13304, 13350, and enforcement provisions in Water Code, Division 7, Chapter 7 (Water Reclamation).

K. EFFECTIVE DATE OF THE ORDER

1. This Order takes effect on July 28-29, 2016.

I, LISA HOROWITZ MCCANN, Interim Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Central Coast Region on July 28-29, 2016.

_____
Lisa Horowitz McCann
Interim Executive Officer

HEK
126-01
CIWQS Place ID 220836
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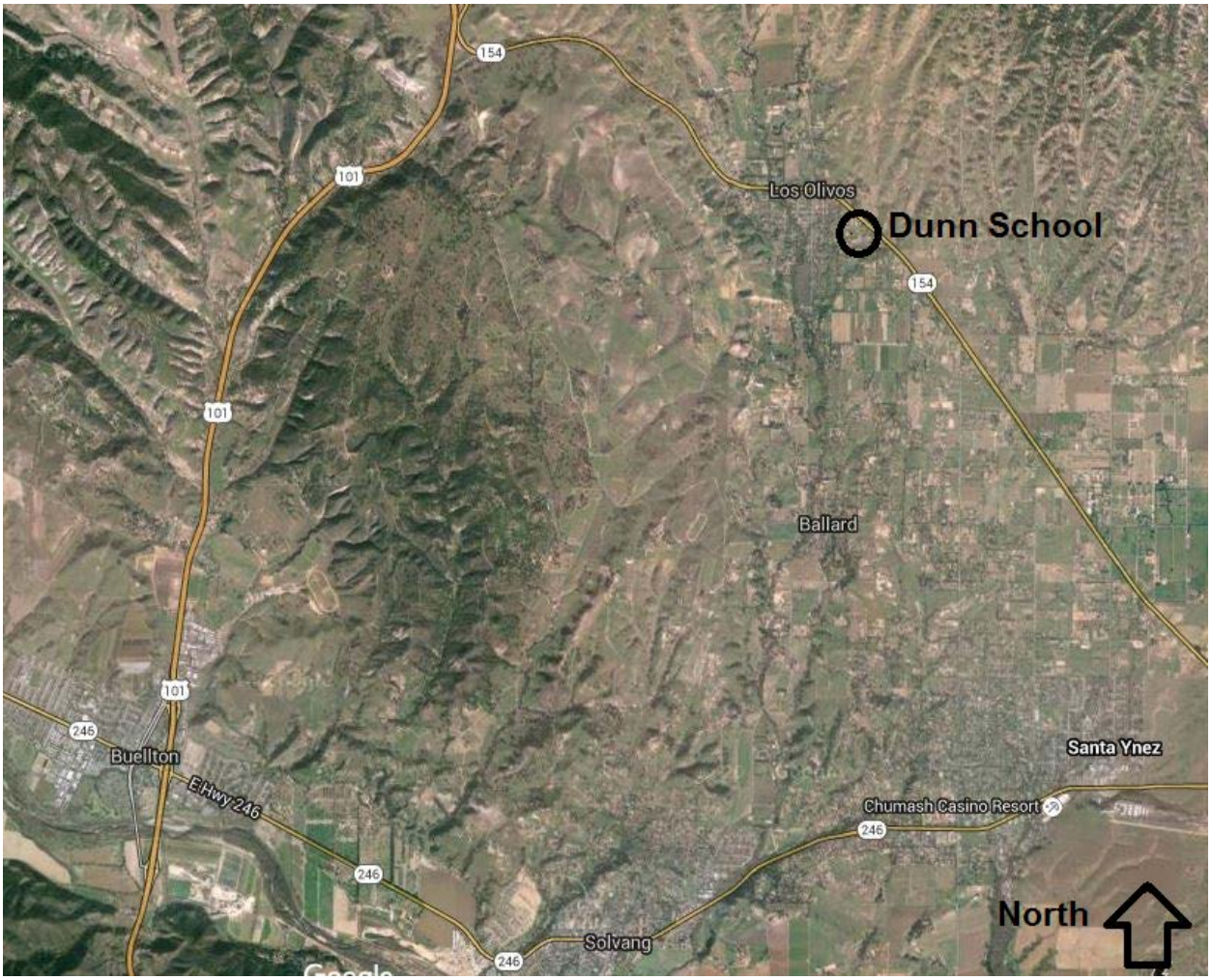
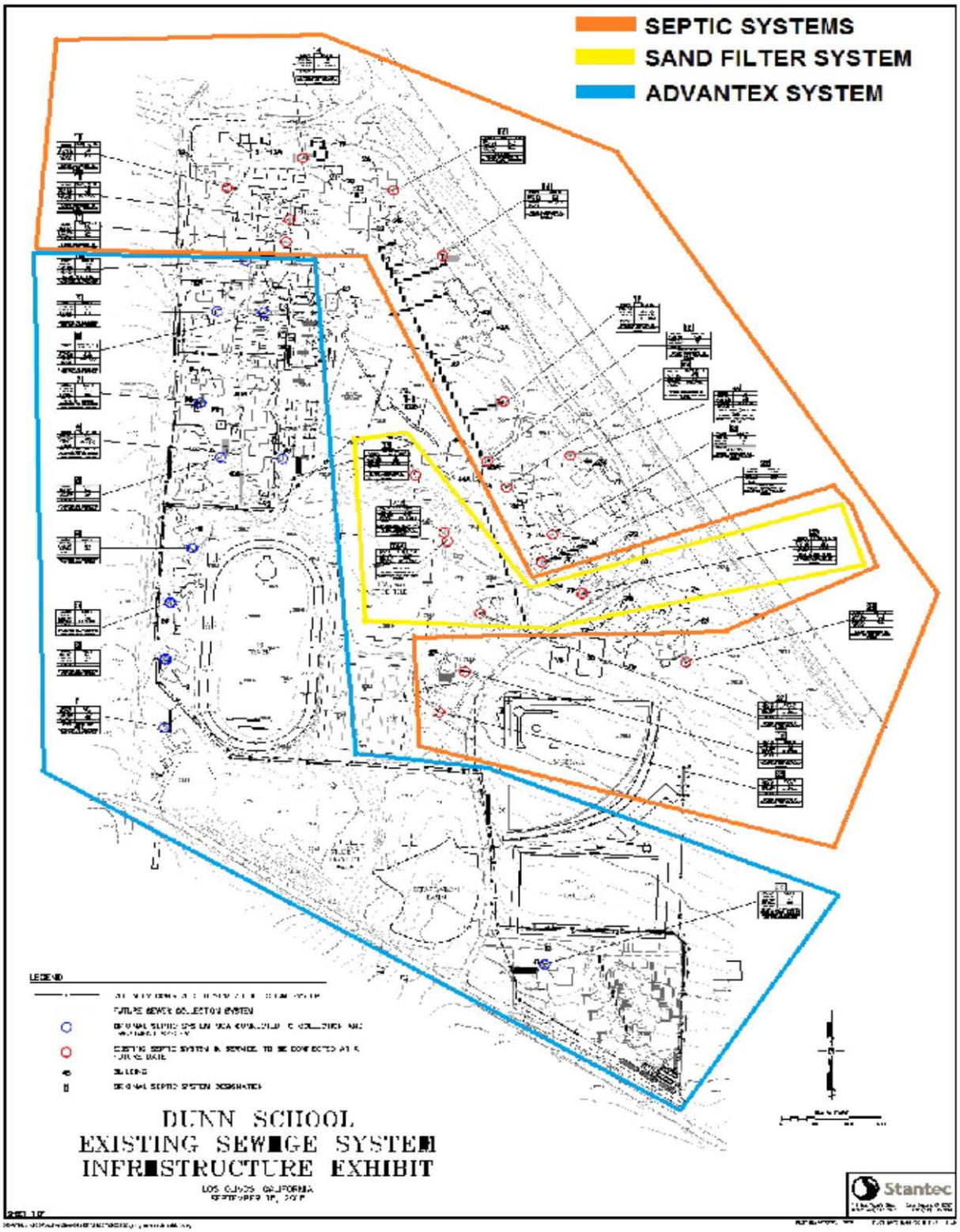
Attachment A - Location of the Dunn School



Attachment B - Location of the Dunn School facilities and onsite wastewater treatment systems


SEPTIC SYSTEMS
SAND FILTER SYSTEM
ADVANTEX SYSTEM
LEGEND
DUNN SCHOOL
EXISTING SEWAGE SYSTEM
INFRASTRUCTURE EXHIBIT
Stantec