



SAN MATEO COUNTYWIDE
Water Pollution Prevention Program
Clean Water. Healthy Community.

Emergency Discharges of Firefighting Water and Foam (C.15.b.iii)

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Background

- Emergency firefighting discharge of water and foam
 - Conditionally exempt discharge since 2009
 - Requirement to implement BMPs
 - should not interfere with immediate emergency response operations
 - Priority of efforts directed toward life, property, and environment (in descending order)



Background

■ MRP 3.0 – new additional requirements

- Regional coordination: Work Group & Regional Report (9/30/2025)
- Evaluation of certain large industrial facilities (e.g., gas concentration facilities, gas plants and chemical plants)
- Outreach
- Training
- Contract language
- Ongoing Implementation



Information about using Best Management Practices (BMPs) to prevent firefighting pollutant storm drain systems and polluting local waterways, the San Francisco Bay, and the Pacific Ocean.

Fire restoration involves cleaning, repairing, and restoring properties damaged by fire and smoke. These activities may involve removing firefighting water and foam used during emergency firefighting activities that remain on-site or in the public right-of-way. It is important that fire restoration contractors follow practices that prevent pollutants such as **foam, water, ash, contaminated soil, burnt materials, oil, and other debris** from entering the storm drain system and waterways.

When pollutants from emergency firefighting activities or fire restoration activities are discharged into the street or storm drain inlets, they flow through the storm drain system to local waterways and the San Francisco Bay (Bay) without any cleaning or filtering. These pollutants can be toxic to fish, wildlife, and people.

Help protect the Bay and local creeks by following these Best Management Practices (BMPs).



NEVER ALLOW WASH WATER TO ENTER THE STORM DRAINS. FEDERAL, STATE, AND LOCAL REGULATIONS PROHIBIT ANY DISCHARGES OTHER THAN RAIN INTO THE STORM DRAIN.

BEST MANAGEMENT PRACTICE Doing the Job Right

PREPARE

- Avoid driving vehicles through the dirt, tracking out pollutants and contaminants.
- Conduct a walk-through of the property streets to identify locations of storm drain inlets that can be protected during cleanup.
- Train staff on these BMPs for stormwater and containment of discharges.

PREVENT STORMWATER POLLUTION

- Block or cover storm drain inlets to prevent entering the storm drain system.
- Collect and remove any remaining firefoam. Do NOT allow the water or foam to enter storm drain inlets, or nearby water bodies. Discharges enter storm drains or water local stormwater agency for guidance (for information).
- Clean outdoor areas with "dry" cleaning as sweeping, vacuuming, dry-mopping, absorbents or rags/towels.
- If water must be used it can not enter a storm drain inlet. Use a wet-vac or a small pump and store wash water in designated container for testing and proper disposal.

PROPER DISPOSAL

- Dispose of all debris, absorbent, and materials in a hazardous waste or to the local landfill.
- Check with your local wastewater treatment plant for collection of firefighting water, wash water, and other materials. Discharges to the sanitary sewer system is prohibited.
- After the site is completely cleaned, remove inlet protection and ensure that storm drain inlets are free of debris.



Information about using Best Management Practices (BMPs) to prevent firefighting pollutants from entering storm drain systems and polluting local waterways, the San Francisco Bay, and the Pacific Ocean.

Firefighting activities are essential for protecting life and property, but they can also pose significant risks to the environment if proper precautions aren't taken. Firefighting water, foam, ash, and other materials generated during emergency responses contain pollutants that, if not properly managed, may enter streets and storm drain inlets. These pollutants flow through the storm drain system to local waterways and the San Francisco Bay (Bay) without any cleaning or filtering. These pollutants can be toxic to fish, wildlife, and people. As a business, it's crucial to implement strategies to prevent these substances from reaching the storm drain system.

Help protect the Bay and local creeks by following these Best Management Practices (BMPs).



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BEST MANAGEMENT PRACTICES (BMPs) Doing the Job Right

PLAN AND PREPARE

- Ensure your facility has a plan for fire prevention, including regular inspections and maintenance.
- Ensure all staff members are trained in fire prevention practices, emergency response procedures and stormwater pollution BMPs.
- Store flammable materials and chemicals in accordance with building and fire code requirements.
- Store materials like timber, pallets, and cardboard in designated areas away from the curb and storm drains. Cover small stockpiles of loose materials with tarps or other covers. Use perimeter controls around larger stockpiles to contain materials.
- Conduct a walk-through of the property and surrounding streets to identify locations of storm drain inlets so they can be protected during emergency response or clean up.
- Work with your local fire department to ensure compliance with fire prevention, and spill prevention and release regulations and establish procedures for stormwater pollution prevention and cleanup.
- Have spill kits, absorbent mats, booms, and/or barriers on-site to contain firefighting runoff and prevent it from entering storm drains, streets, or water bodies.
- Plan a method for containing emergency firefighting water in designated bins/areas for proper disposal, as practical.
- Have a pre-established contract with a fire restoration contractor and/or environmental remediation contractor for quick cleanup and proper disposal of firefighting runoff and materials.
- Ensure that emergency measures are in place to protect storm drains from discharges that may occur during firefighting events. These controls, such as mats to cover storm drain inlets, berms to block storm drain inlets,

Regional Coordination Permit Requirements

- **BAMSC Regional Firefighting Discharges Work Group**
 - Includes representatives from EPA, Regional Water Board, stormwater programs, fire departments and other invited organizations
 - Met twice per FY (FY 22/23 – 24/25)
 - Will continue to meet at least once per FY
 - Develop Regional Report



BAY AREA MUNICIPAL
STORMWATER (BAMS)
COLLABORATIVE

Regional Report (9/30/2025)

■ Objectives

- Document what was learned in Regional WG
- Address Permit requirements
- Address BMPs cited in Permit & Permit Fact Sheet

■ Permittees must implement Regional Report recommendations



BAY AREA MUNICIPAL
STORMWATER (BAMS) COLLABORATIVE

Regional Firefighting Emergency Discharges Report

Submitted in compliance with the San Francisco Bay Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, Order No. R2-2022-0018, Provision C.15.b.iii.(2)

Prepared on behalf of:

Alameda Countywide Clean Water Program

Contra Costa Clean Water Program

San Mateo Countywide Water Pollution Prevention Program

Santa Clara Valley Urban Runoff Pollution Prevention Program

Solano Stormwater Alliance

September 30, 2025

Regional Report Due (9/30/2025)

- Approach for Report Recommendations
 - Continue to emphasize priority of life and property
 - BMPs identified for pre-emergency (e.g., choosing least environmentally harmful foam) and post-fire (e.g., public right of way clean up)
 - Important to not dismiss a BMP without identifying when it could be used (e.g., pre, during or post emergency) or who should implement



Regional Report Due (9/30/2025)

- Approach for Report Recommendations (Continued)
 - BMPs identified during emergency focus on implementing training fire fighters receive on proper use of foams and use of appropriate foam (e.g., Class A or Class B)
 - Align recommendations with other Stormwater Permit or regulatory requirements (e.g., MPR Provision C.5, CalOES reporting)
 - Stormwater Program staff review **coordination and communication** between firefighting agencies, municipal staff, and/or clean up crews operating in public right of way

Recommendations

Recommendation	New	Already Required/ Implemented
<p>Municipal staff and firefighting agencies should consider reviewing their coordination and communication procedures for ensuring proper coordination between municipal departments, firefighting agencies, and cleanup crews to manage discharges to the MS4 that may impact water quality after the emergency is over.</p>		
<p>Municipal staff should maintain a spill, dumping, and complaint response flow chart, phone tree, or contact list that shows the various responsible agencies and their contacts, and who would be involved in illicit discharge incident response that goes beyond the Permittee's immediate capabilities. Municipalities can use this contact list or provide it to the fire department for use, as needed, for responding to discharges of firefighting water and foam that impact receiving water.</p>		MRP Provision C.5.c.ii.(5)
<p>Municipal staff and firefighting agencies should consider incorporating resource-sharing practices, such as providing access to drainage system maps and identifying critical drainage release points, where appropriate. This information can support, help prioritize, and potentially mitigate water quality impacts of firefighting activities.</p>		MRP C.5.f
<p>Passive dechlorination may be an acceptable BMP used to reduce chlorine in firefighting water discharges.</p>		

Recommendations

Recommendation	New	Already Required/ Implemented
<p>Plugging/covering storm drain inlets is <u>not</u> recommended during active emergency firefighting activities due to the risk of flooding, street or traffic hazards, and potential infrastructure damage.</p>	NA	NA
<p>If conditions allow, dechlorination tablets and storm drain covers/plugs may be considered during post-fire cleanup efforts in the public right of way as a tool to help prevent harmful discharges from reaching nearby waterways.</p>		Review illicit discharge response program
<p>Municipal staff and firefighting agencies should consider developing and delivering training materials or outreach on water quality impacts and applicable stormwater BMPs if not already available. These trainings or outreach should be made available to firefighters, municipal staff, and contractors involved in the containment and cleanup of discharges from firefighting emergencies.</p>		SMCWPPP Fire Restoration Contractor Tip Sheet
<p>Firefighting agencies should continue to purchase and use the least environmentally harmful foams. Municipal staff can assist by making the resources identified in the Regional Report (e.g., Safety Data Sheets, GreenScreen Certified® products, example procedure for choosing the least environmentally harmful foams) available to their local fire departments.</p>		

Recommendations

Recommendation	New	Already Required/ Implemented
For those departments that have not yet disposed of PFAS-containing foams, it is recommended that they refer to Solutions for Firefighting Foam Transition webinar , by CDM Smith, or the FAA Transition Plan research for guidance, and coordinate with the appropriate municipal staff handling solid and/or hazardous waste.	✓	
Fire departments should continue to ensure that personnel making decisions on the use of foam and overseeing deployment of foam are properly trained on the use of foam.		Review firefighter training
Report any significant release or threatened release of a hazardous material to CalOES		CERCLA
Report use of PFAS-containing Class B foams to the State Fire Marshal's office		SB 1044

Permittee Actions

- Identify local Fire Department (FD) point of contact
- Identify meeting schedule with FD (e.g., quarterly, annually, as needed, etc.)
 - Suggested meeting topics provided to CII
- Engage FD for MRP 4.0 negotiations
- Attend BAMSC Regional Work Group meetings
- Identify county/state organization(s) SMCWPPP should engage

Contact Information



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