
San Francisco Bay Regional Water Quality Control Board

Sent via electronic mail: no hard copy to follow

October 25, 2017
CIWQS Place No. CW-811765

To: County Public Health Officers, see distribution list
cc: Municipal Stormwater NPDES Permittees, see distribution lists

Subject: Sidewalk Sanitizing Best Management Practices – Hepatitis A Outbreak

Dear Public Health Officers and Municipal Stormwater NPDES Permittees:

We are writing regarding the recent, hepatitis A outbreaks in other areas of California. We want to advise you of proper best management practices for the sanitation of public right-of-ways (e.g., sidewalks, streets, and gutters) should outbreaks occur in your jurisdiction, or aggressive outdoor sanitizing efforts are necessary to prevent other communicable diseases from spreading within any of the nine San Francisco Bay Counties.

There are long-proved and simple best management practices (BMPs) for sidewalk washing, available [\[here\]](#). Bay Area stormwater discharges in highly urbanized areas are regulated by California Regional Water Quality Control Board, San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit, Order No. R2-2015-0049, NPDES Permit No. CAS612008, November 19, 2015, available [\[here\]](#). Other Bay Area stormwater discharges are regulated by a general permit issued by the State Water Resources Control Board available [\[here\]](#). Essentially, these permits implement the federal Clean Water Act goals for “only rain down the storm drain.” These BMPs for sidewalk washing comply with these permits and federal Clean Water Act goals.

In short, these established practices include the following sequence of actions: plug stormdrains and surround the area with berms; sweep up solids, trash, and debris; power wash the area; collect all wash water; and lastly, disposal of wash water to sanitary sewer (and when appropriate, disposal to landscaping). These BMPs do

These BMPs do not include the use of chemicals for sanitization purposes. Where it is necessary to use chlorine bleach or other chemicals outdoors to sanitize against hepatitis A, it may be most convenient to develop one set of written procedures to be used throughout each County or across the San Francisco Bay region. Typically, sanitation procedures include a final application of chemical solution (e.g. disinfectant). Subsequent rainfall could carry the chemical into the storm drain. Therefore, the procedures must describe how to comply with chlorine or other chemical concentration limit in water discharged to storm drain. Dechlorination procedures must assure that chlorine residual does not exceed 0.1 mg/L before discharging into the storm drain.

To help staff of the Municipal Regional Stormwater NPDES Permittees develop new procedures, we refer you to the recently updated County of San Diego Department of Environmental Health's *Sanitation Procedures for Public Right-of-Ways*, available [\[here\]](#). Note that an industrial-type wet vacuum cleaner can be used instead of a vactor truck (Step 9), depending on the volume of disinfectant and water generated by pressure washer. Note that San Diego County requested that staff of the San Diego Regional Water Quality Control Board review their procedures for compliance with their municipal stormwater permit. San Diego Water Board staff determined that these procedures are in compliance for the dry season, but expressed concern for the wet season when it is more difficult to control runoff. Our staff would be willing to review procedures you propose prior to implementation.

The Water Boards are responsible both for enforcing the federal Clean Water Act and for implementing California's Human Right to Water law, available [\[here\]](#). The former is our responsibility to ensure "only rain down the storm drain," and the latter is our responsibility to protect public health. California's Human Right to Water recognizes that "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes."

Just two years ago, the San Francisco Bay Water Board recognized that discharges of trash and human wastes from homeless encampments pose a significant water quality and public health threat in its Resolution No. R2-2015-0024, available [\[here\]](#). This resolution recognizes that the "problem of discharges of trash and human waste from homeless encampments is entwined with complex and challenging societal issues, including poverty, the Bay Area's high cost of living, and un- and under-employment."

We commend public health, public works, and public sanitation employees for their hard work to prevent an outbreak of hepatitis A in additional parts of California. Should you have any questions, please first contact the Program Coordinators of the Stormwater NPDES Permittees identified in the distribution list below. Subsequently, if you have remaining questions, please contact either Watershed staff Selina Louie at (510) 622-2383 or via e-mail to Selina.Louie@WaterBoards.ca.gov or Elyse Heilshorn at (510) 622-2329 or via e-mail to Elyse.Heilshorn@WaterBoards.ca.gov.

Sincerely,

Naomi Feger, Chief
Planning Division

Distribution List:**County Public Health Officers**

Alameda County: Muntu Davis, MD, MPH, Muntu.Davis@acgov.org
Alameda County: Ronald Browder, Ronald.Browder@acgov.org
Contra Costa County: Marilyn Underwood, Marilyn.Underwood@hsd.cccounty.us
Marin County, Matthew Willis, MD, MPH, mwillis@marincounty.org
Napa County, Karen I. Relucio, MD, karen.relucio@countyofnapa.org
San Francisco City and County, Tomás J. Aragón, MD, DrPH, tomas.aragon@sfdph.org
San Mateo County, Heather Forshey, hforshey@smcgov.org
Solano County, Bela T. Matyas, MD, MPH, btmatyas@solanocounty.com
Sonoma County, Karen Milman, MD, MPH, Karen.Milman@sonoma-county.org
Santa Clara County, Sara Cody, MD, sara.cody@phd.sccgov.org
Santa Clara County, Michael Balliet, Michael.Balliet@cep.sccgov.org

Municipal Regional Stormwater NPDES Permittees Program Coordinators

To be forwarded to all 76 Municipal Regional Stormwater Permittees through their respective countywide program coordinators listed below.

Jim Scanlin, Alameda Countywide Clean Water Program: jims@acpwa.org
Geoff Brosseau, Bay Area Stormwater Management Agencies Association:
geoff@brosseau.us
Rachel Kraai, Contra Costa Clean Water Program: Rachel.Kraai@pw.cccounty.us
Kevin Cullen, Fairfield-Suisun Sewer District: kcullen@fssd.com
Matt Fabry, San Mateo Countywide Pollution Prevention Program:
mfabry@ci.brisbane.ca.us
Adam Olivieri, Santa Clara Valley Urban Runoff Pollution Prevention Program:
awo@eoainc.com
Jill Bicknell, Santa Clara Valley Urban Runoff Pollution Prevention Program:
jcbicknell@eoainc.com
Jill Mercurio, City of Vallejo: jill.mercurio@cityofvallejo.net
Jennifer Harrington, Vallejo Flood & Wastewater District: jharrington@vsfcd.com

Small Municipal Stormwater NPDES Permittees Program Coordinators

Jeff Jones, Port of Oakland: jjones@portoakland.com
Gary Jensen, Bay Area Rapid Transit Dist: gjensen@bart.gov
Donna Placzek, California State University Eastbay: donna.placzek@csueastbay.edu
Timothy Pine, University of California Berkeley: tpine@berkeley.edu
Michael Fehling, Carnegie SVRA: michael.fehling@parks.ca.gov
Vincent Reed, FCI Dublin: vreed@bop.gov
Glennwood Ivey, US Coast Guard Base Alameda: glennwood.t.ivey@uscg.mil
Diane Decicio, City of San Rafael: diane.decicio@cityofsanrafael.org
Scott Derdenger, City of Belvedere: Sderdenger@cityofbelvedere.org
Bob Beaumont, County of Marin: bbeaumont@marincounty.org
Mark Lockaby, Town of Fairfax: mlockaby@townoffairfax.org
Kevin Kramer, Town of Corte Madera: kkramer@ci.corte-madera.ca.us

Sean Condry, Town of San Anselmo: scondry@townofsananselmo.org
Jonathon Goldman, City of Sausalito: jgoldman@ci.sausalito.ca.us
Mary Houlihan, City of Larkspur: mghoulihan@cityoflarkspur.org
Bianca Gomez, City of Mill Valley: bgomez@cityofmillvalley.org
Rob Braulik, Town of Ross: rbraulik@townofross.org
Jason Nutt, City of Novato: jnutt@novato.org
Matt Swalberg, Town of Tiburon: m Swalberg@ci.tiburon.ca.us
Graham Wadsworth, Town of Yountville: gwadsworth@yville.com
Larry Luporini, City of American Canyon: lluporini@cityofamericancanyon.org
John Ferons, City of St Helena MS4 Permit: johnf@cityofsthenela.org
Jacques LaRochelle, City of Napa: jlrochelle@cityofnapa.org
Nancy Watt, Napa County: nancy.watt@countyofnapa.org
Michael Kirn, City of Calistoga: mkirn@ci.calistoga.ca.us
Richard Berman, Port of San Francisco: Richard.Berman@sfport.com
Lewis Harrison, San Francisco Public Utilities Commission: LHarrison@sflower.org
Travis Clark, University of CA San Francisco: DClark@ehs.ucsf.edu
Patricia McFadden, Treasure Island Wastewater Treatment Plant:
patricia.a.mcfadden@navy.mil
Robert Beck, Treasure Island Development Authority: Bob.Beck@sfgov.org
Denis Mulligan, Golden Gate Bridge Highway and Transportation District:
dmulligan@goldengate.org
Stephen Chao, Peninsula Corridor Joint Powers Board: chaos@samtrans.com
Adam Bayer, San Jose State University: adam.bayer@sjsu.edu
Walter Marchetti, Santa Clara Valley Transportation Authority: walter.marchetti@vta.org
Brian Currier, California State Parks: brian.currier@owp.csus.edu
Luann Tetirick, Travis AFB: luann.tetirick@us.af.mil
Nicholas Burton, County of Solano Region 2: nsburton@solanocounty.com
Nouae Vue, City of Benicia: nvue@ci.benicia.ca.us
Isidro Farias, California Maritime Academy: ifarias@csum.edu
Nazareth Tesfai, Sonoma County Water Agency: nazareth.tesfai@scwa.ca.gov
Dan StJohn, City of Petaluma: dstjohn@ci.petaluma.ca.us
Reg Cullen, Permit and Resource Management Department: Reg.Cullen@Sonoma-County.org
Wendy Atkins, CITY OF SONOMA: watkins@sonomacity.org
Mario Pasquini, State of CA Sonoma Developmental Center:
mario.pasquini@sonoma.dds.ca.gov