

From: [REDACTED]

Sent: 06 December 2022 15:01:32

To: [REDACTED]

Subject: Information Request on storage of Class B Firefighting Foam Containing Persistent Organic Pollutants (POPs)

Importance: Normal

Sensitivity: None

OFFICIAL

Hi [REDACTED]

I am writing to ask if you have any stocks of PFOA containing Class B firefighting foam which you maintain or have brought onto your site in the event of an incident and to make you aware that Perfluorooctanoic acid (PFOA), also known as C8, has many industrial applications including in the use as a surfactant in Class B firefighting foam. PFOA, its salts and PFOA-related compounds are categorised as Persistent Organic Pollutants (POPs). POPs represent a long lasting and global risk to the environment and human health. They are toxic and gradually build up to harmful levels in living organisms. The Stockholm Convention requires that wastes containing POPs above the relevant threshold level should be disposed of in such a way that the POP content is destroyed or irreversibly transformed. In Scotland, SEPA is the competent authority for the UK POPs Regulations 2007.

The requirements in relation to any firefighting foam that contains PFOA will change on 1 January 2023. There is a derogation in place for the use of PFOA in Class B firefighting foam already installed in systems, including both mobile and fixed systems, subject to certain conditions being met including that it can only be used in sites where releases can be contained. This derogation is valid until 4 July 2025, to allow the phase out of the PFOA based FFF firefighting foam by this date.

The headline requirements to note are detailed below:

Phase out timeframes:

- Use of firefighting foam containing PFOA is prohibited for training purposes (this prohibition has been in place since July 2020).
- Testing of equipment/systems of firefighting foam containing PFOA is allowed only if releases are contained and can be properly disposed of (this has also been in place since July 2020).
- From 1 Jan 2023 - Use of firefighting foam containing PFOA is permitted only where foam release can be contained.
- From 4 July 2025 - All uses of firefighting foam containing PFOA are prohibited.

Information Request:

In order to better understand how the phase out of the PFOA based FFF firefighting foam may impact on you, please answer the following questions by no later than the 16 December 2022. Responses are to be sent to [REDACTED]@sepa.org.uk:

1. Do you maintain any stocks of firefighting foam on site? Yes/No

If Yes

- a. Do any of the Foams contain PFOA or PFOS? (if you are unsure, we recommend you check MSDS or speak to manufacturer)
 - b. In what quantity? (m3/tes)
2. Would any stocks of firefighting foam be brought onto site in the event of an incident? (if you are unsure, we recommend you speak to fire brigade)? Yes/No

If Yes

- a. Do any of the Foams contain PFOA or PFOS? (if you are unsure, we recommend you can check MSDS or speak to manufacturer)

SEPA has just produced a draft guidance note on this, please let me know if you wish to see the guidance. We are asking for comments on it by the 9th of December, so apologies on a very short turnaround period.

Should you have any queries on the above I would be happy to discuss.

Regards

Waste & Industry Unit

Scottish Environment Protection Agency, Angus Smith Building, 6 Parklands Avenue, Eurocentral, Holytown, North Lanarkshire, ML1 4WQ

Mobile:

Disclaimer

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients.

Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to [REDACTED]@sepa.org.uk.

Registered office: Strathallan House, Castle Business Park, Stirling FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

Dh'fhaodadh gum bi am fiosrachadh sa phostd seo agus ceanglachan sam bith a tha na chois diomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd faighinn a bha còir am fiosrachadh fhaighinn.

Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist.

Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu [REDACTED]@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

OFFICIAL