

Frequently Asked Questions

Annual reporting of stockpiles of fire-fighting foams containing Perfluorooctanoic Acid (PFOA) and PFOA-related substances to the EPA

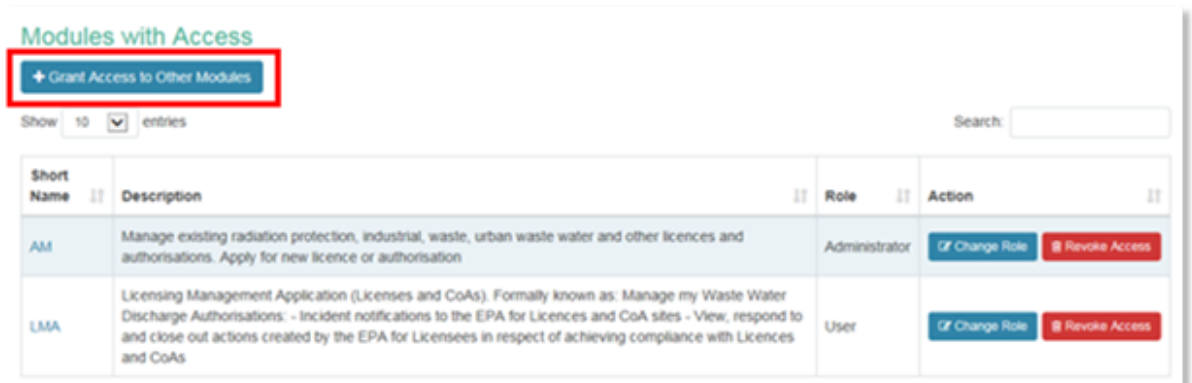
Please note that this is a supporting document to our [factsheet](#), where you can find more information on reporting stockpiles of fire-fighting foams containing PFOA and PFOA-related substances.

1. Q: How do I access the module for reporting stockpiles of foam containing PFOA and PFOA-related substances in EDEN?

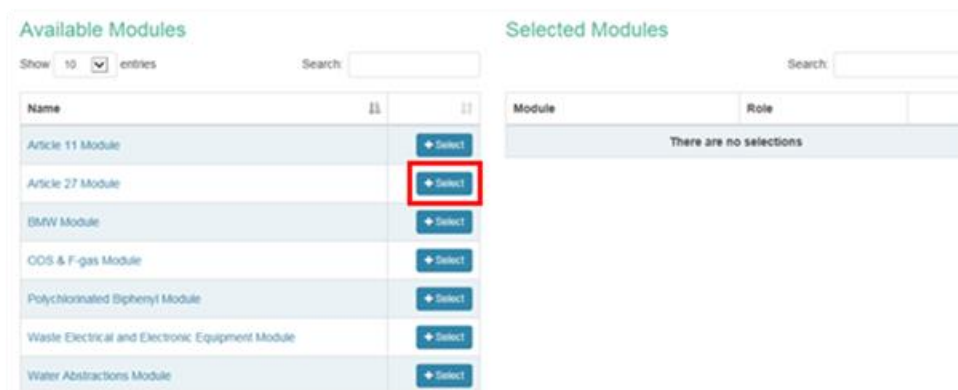
A: There are two sets of instructions below that can be used to access the “Persistent Organic Pollutant” (POP) module in EDEN for reporting:

OPTION 1: If you are an EDEN Portal Organisation Administrator you can grant yourself module access as follows:

- I. Log into EDEN portal, <https://www.edenireland.ie/>
- II. Switch organisation if necessary. Information on switching between organisations can be found [here](#).
- III. Hover over the Admin menu and click on Manage Users.
- IV. Click the ‘Manage Access’ button beside your user account.
- V. Click the button ‘Grant Access to Other Modules’.



- VI. Click on the ‘+Select’ beside the module you require access too.



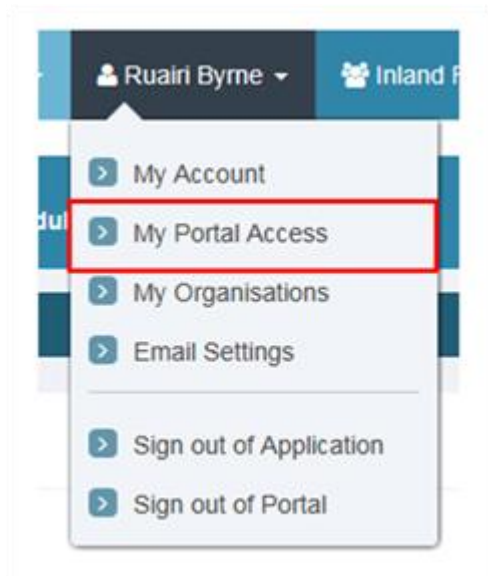
- VII. Select a role.
- VIII. Click the 'Continue' button.
- IX. Click the 'Save Selections' button.

OPTION 2: If you are a standard user you will need to request access to the module using the guide below and then wait for the EDEN Portal Organisation Administrator to approve the request.

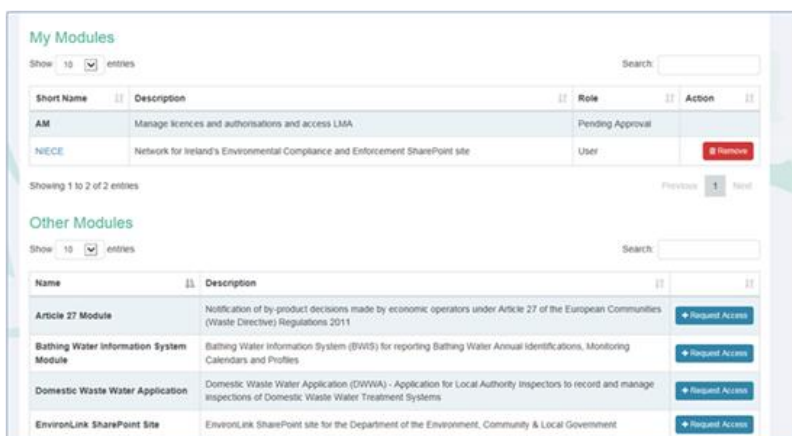
- I. Navigate to <https://www.edenireland.ie/> and sign in. In the top right corner use the organisation switcher to switch to the correct organisation if necessary.
- II. Click on your username.



- III. Click 'My Portal Access' in the drop-down menu.



- IV. Scroll down to 'Other Modules'.
- V. Click on the 'Request Access' button beside the module you require access to.



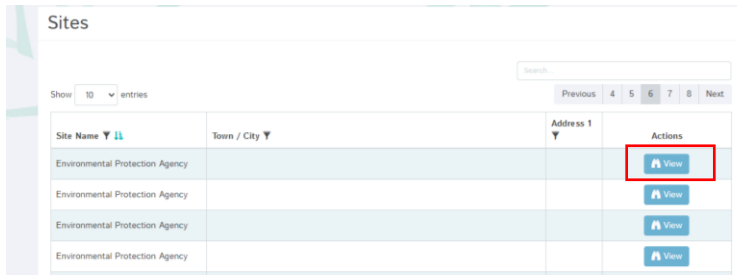
- VI. Click the 'Submit Request' button on the pop-up screen.

The request will then need to be processed by either an organisation administrator or a module administrator.

2. Q: Once I have access to the POP module in EDEN, how do I complete the reporting process

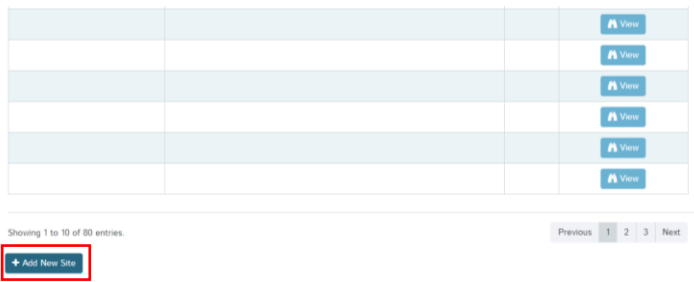
A: Click on the POP module and follow the instructions below to complete the reporting process:

- I. Under “Sites”, select the site for which you are reporting by clicking the “view” button

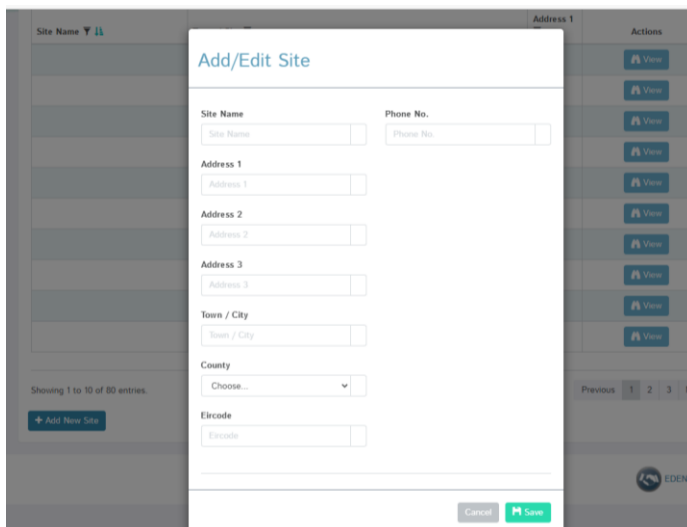


or

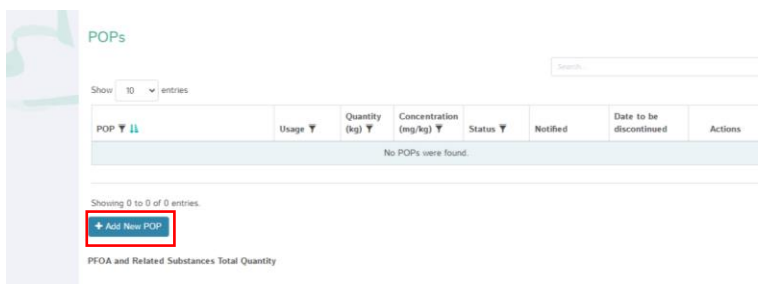
click “add a new site” at the bottom of the page, if you are reporting for a site for which there are no current details in EDEN.



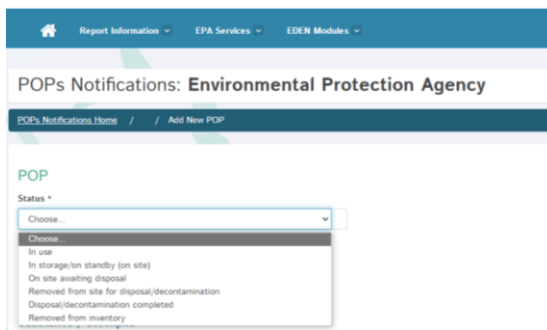
To add a new site, complete the site details in the pop-up window. Click the “save” button when completed, and then click the “view” button for the relevant site to proceed.



II. Click on “Add New POP”.



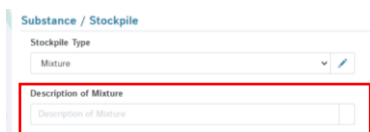
III. Under “status” select from the drop-down menu options.



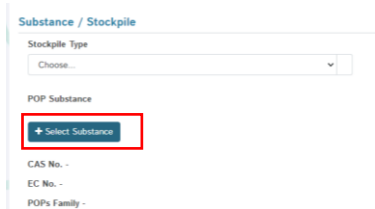
IV. Under “Stockpile type”, select “mixture” from the dropdown menu if reporting for fire-fighting foams.

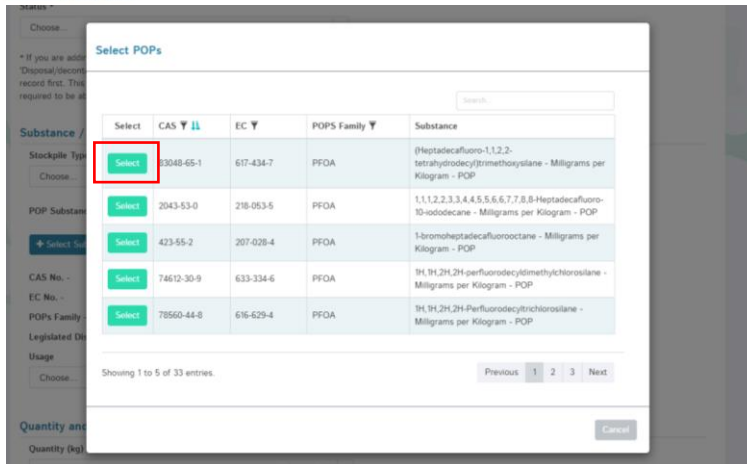


V. Under “Description of Mixture” add information including the name of the foam (as per the Safety Data Sheet) and how the concentration of PFOA or PFOA-related substances was determined i.e. state if laboratory analysis was performed. If analysis of the foam has been carried or you are awaiting results please state this.

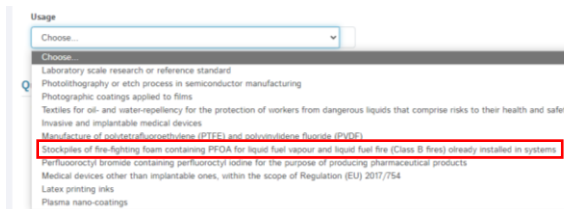


VI. Under “POP Substance” click the “+Select Substance” button and in the pop-up window click “select” adjacent to the appropriate PFOA or PFOA-related substance substance.





VII. Under “Usage” select “Stockpiles of fire-fighting foam.....”from the drop-down menu options.



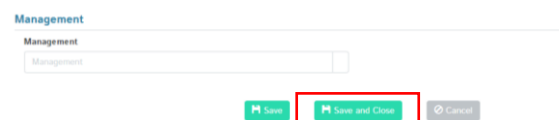
VIII. Under “Quantity” add the quantity in kg of PFOA-containing foam.

IX. Under “Concentration” add the concentration in mg/kg of PFOA/PFOA-related substance in the foam. This should be as per your own laboratory analysis of the foam or the specific concentration provided by the supplier of the foam. If awaiting test results, see question 8 below, for the information to add.



X. Under “management” add information on how the foam is managed and stored.

XI. Click “save and close” at the bottom of the page. This will return you to the “POPs Notifications” page for your site.



XII. To complete the notification, scroll down to the “Annual Notification Log” on the POPs Notifications page and click “add new annual notification”.

Your submission will be reviewed, and you will be contacted should any issues arise.

3. Q: The quantity of foam containing PFOA/PFOA-related substances on the site is less than 50 kg, do I need to report this via EDEN?

A: No, reporting via EDEN is only required for stockpiles ≥ 50 kg. Instead, you should notify the EPA by emailing pops@epa.ie with the following information:

- I. Name and address of location where foam is installed;
- II. Quantity or quantities and brand(s) of foams – include the SDS;
- III. Details of any laboratory analysis carried out and results obtained or any information available on the chemical composition of the foam; and
- IV. Contact details of person(s) making the notification.

4. Q: How can I find out if a foam contains PFOA or PFOA-related substances above the reporting thresholds?

A: Laboratory analysis is required. This should include analysis of the foam for PFOA (CAS No. 335-67-1). A full list of substances that are classed as “PFOA, its salts and PFOA-related compounds” is available at [PFAS | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/pfas). This currently consists of 32 substances and will be added to in the future and further testing of foams may be required. You should request the results in mg/kg, as this is the unit used for reporting and for comparing to the threshold levels of 0.025 mg/kg for PFOA and 1 mg/kg for PFOA-related substances. Examples of the concentration of PFOA detected in selected fire-fighting foams is available at [PFAS | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/pfas).

5. Q. Can information from the foam safety data sheet (SDS) be used to determine if it contains PFOA?

A: It can be difficult to determine if a foam contains PFOA without laboratory analysis. The SDS can be reviewed as a starting point. Words such as “fluorosurfactant”, “C6”, “C8” or contains “fluorine/fluorinated constituents” indicate the presence of Per- or Polyfluoroalkyl Substances (PFAS) – “C8” often indicates that PFOA is used in the manufacture of the foam, while C6 indicates that other PFAS are used. However, C6 foams can contain PFOA as a by-product even if not used directly in the manufacture of the foam. Additionally, the absence of such information may not imply the foam does not contain PFOA or related substances. In any case, you should contact your supplier for this information requesting confirmation of any analysis conducted. If this is not possible, you should arrange analysis of the foams for PFOA.

6. Q: What laboratories can test foams for PFOA?

A: While the EPA cannot recommend any specific laboratory for testing for PFOA, we are aware of the following labs that can undertake PFAS/PFOA testing of foams, but there

may be more (please contact www.pops.ie if you are a laboratory that can carry out analytical testing of foams for PFOA and would like to be added to the list below):

SGS: <https://www.sgs.com/en/testing>.

Vito: <https://vito.be/en>

Eurofins: <https://www.eurofins.co.uk/environmental-testing/>

7. Q: The foam SDS states that it is fluorine free – do I need to report via EDEN?

A: No, fluorine-free foams do not contain PFAS, including PFOA, and do not need to be reported.

8. Q: I am awaiting analysis of the foam to determine if it has PFOA or not, do I need to make an annual report via EDEN?

A: Yes, if you have foams containing, or that you suspect contain PFOA or PFOA-related substances, you are required to report annually to the EPA via EDEN. When awaiting analysis results, the following generic PFOA information can be used for completing your report in EDEN:

- Pentadecafluorooctanoic acid (PFOA);
- CAS number: 335-67-1;
- EC number: 206-397-9;
- Concentration : 0.025 mg/kg;
- Select “mixture” and add some text under “description of mixture” with the foam name (as per the SDS) and that analysis is pending/underway.
- Once test results are available, you can email POPs@epa.ie to update your report.

9. Q. What is the deadline annually for reporting stockpiles?

A: The 4th July is the deadline each year.

10. Q: There is >50kg of PFOA-containing foam on site but we are planning on disposing of the foam soon, do we need to report via EDEN?

A: Yes, you need to complete a report and, when disposed of, you can add disposal certificates and reduce the quantity until all has been disposed of. All stock must be disposed of using a registered waste management company by 4th July 2025.

11. Q: The foam SDS indicates that its contains X% fluorosurfactants, can the PFOA concentration be determined from this?



A: Fluorosurfactants can comprise a range of PFAS, including PFOA/PFOA-related substances, and therefore it is not appropriate to use this value to estimate the PFOA concentration. The foam needs to be tested for PFOA to determine the concentration.