



What to include in a PFOS waste management plan

As a part of managing the storage, transport and disposal of PFOS contaminated materials, you may be asked to prepare a waste-management plan. This guide gives a list of the types of information that we would expect to see in this sort of plan.

PFOS is a persistent organic pollutant (POP) which was banned for use in New Zealand from 2006 onwards in fire-fighting foams, and from 2011 in all other products. It is harmful in the environment (ecotoxic) and may affect human health after long-term exposure. It is illegal to release PFOS into the general environment in New Zealand. However, some stocks of PFOS-containing fire-fighting foams are still in New Zealand, and these need to be managed safely.

Preparing this sort of waste-management plan needs specialist skills and technical expertise. This list shows the type of information that we would expect to see in this sort of plan. Please note, this is not intended to be an exhaustive list, and you may identify other things to include.

Having a clear plan with a detailed description, and evidence that you have followed it, would be a good way to demonstrate that you have complied with the law.

Please use this guidance in conjunction with our guidance on:

[Managing fire-fighting foams manufactured with PFAS chemicals](#)

[How to dispose of fire-fighting foams containing PFOS](#)

1. A brief summary of the work to be undertaken:

- identifying all stocks of foam and storing them appropriately
- procedures for removing foam from trucks/equipment and decontamination
- method for preparing materials for transport
- transport
- disposal – foam concentrate, waste water, other contaminated materials

You could create different sections of the plan for materials that are more straightforward to manage (e.g. foams in sealed containers) versus more complicated clean-up operations (e.g. decontaminating fire trucks and equipment).

2. Other relevant documents

- HSNO Compliance Order, if this was issued
- health and safety plan
- application for a hazardous waste export permit

3. Allocation of roles and responsibilities

- technical expert responsible for creating plan
- your in-house authorised sign off of plan
- most important: who is responsible for implementing and monitoring the activities detailed in the waste-management plan from start to finish
- any other relevant roles.

4. Site management

- site control procedures
- site access
- locations and isolation of work areas
- transport routes
- location of clean areas
- location of site facilities.

5. Health and safety protection measures, such as:

- site induction procedures
- personal protective equipment requirements
- personal hygiene requirements
- first aid and decontamination procedures.

6. Environmental management procedures

Controls to be put in place to manage environmental issues e.g. spill containment.

7. Monitoring, sampling and analyses

To include details such as:

- number of sampling points
- frequency of sampling
- techniques appropriate to the substance sampling
- analysis by accredited laboratory
- compliant with relevant guidance, where applicable.

8. Unexpected discovery protocols

- process to deal with PFOS material not previously identified
- how to ensure that this new material is managed safely and appropriately
- documentation procedure.

9. Trigger values or conditions requiring action

- standard for clean-up of equipment
- acceptance criteria for proposed New Zealand receiving landfills and trade waste facilities (if relevant)
- workplace exposure standards (if relevant).

10. Reporting requirements

Including:

- results of monitoring, sampling and analyses, and comparison with trigger values
- outcome of any unexpected discovery
- proposed method/location of disposal, treatment technique and reasons for selection
- other reporting requirements needed to export hazardous waste.

11. List of key contacts

Including the site owner/manager, primary contractor, emergency services and regulatory agencies.

12. Document control information

Such as version, date, internal quality assurance and authorisation, who the plan is to be issued to.

Other resources

[Applying for a permit to export PFOS as a hazardous waste](#)

[EPA Notice on Hazardous Substances \(Storage and Disposal of Persistent Organic Pollutants\) Notice 2004](#)

[Basel Convention Technical Guidelines for PFOS](#)

[Basel Convention Technical Guidelines for POPs](#)

[Ministry for the Environment contaminated land management guidelines](#)

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Further information

More detailed information is available on our website at www.epa.govt.nz or by contacting us directly.

Email: eez.info@epa.govt.nz

Freephone (within New Zealand): 0800 208 338

Phone from overseas: +64 4 916 2426

Postal address: Environmental Protection Authority,
Private Bag 63002, Wellington 6140, New Zealand.

Physical address: Level 10, Grant Thornton House,
215 Lambton Quay, Wellington 6011, New Zealand.

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