

**Halon Substitutes Under SNAP as of March 29, 2006****SNAP Information: <http://www.epa.gov/ozone/snap>**

EPA has created the Significant New Alternatives Policy (SNAP) Program under section 612 of the Clean Air Act Amendments. SNAP evaluates alternatives to ozone-depleting substances. Substitutes are reviewed on the basis of ozone depletion potential, global warming potential, toxicity, flammability, and exposure potential as described in the March 18, 1994 final SNAP rule (59 FR 13044). Lists of acceptable and unacceptable substitutes will be updated periodically in the Federal Register. The following SNAP notices and subsequent final rules are included in this list: August 26, 1994 (59 FR 44240), January 13, 1995 (60 FR 3318), June 13, 1995 (60 FR 31092), July 28, 1995 (60 FR 38729), February 8, 1996 (61 FR 4736), May 22, 1996 (61 FR 25585), September 5, 1996 (61 FR 47012), October 16, 1996 (61 FR 54030), March 10, 1997 (62 FR 10700), June 3, 1997 (62 FR 30275), February 24, 1998 (63 FR 9151), May 22, 1998 (63 FR 28251), January 26, 1999 (64 FR 3861), April 28, 1999 (64 FR 22981), April 26, 2000 (64 FR 30410), April 26, 2000 (65 FR 24387), January 29, 2002 (67 FR 4185), December 20, 2002 (67 FR 77927), August 21, 2003 (68 FR 50533) October 1, 2004 (69 FR 58903), March 29, 2006 (71 FR 15589).

**Acceptable Substitutes for Halon 1211 Streaming Agents Under the
Significant New Alternatives Policy (SNAP) Program as of March 29, 2006**

Substitute	Trade Name	Comments
HCFC-123	FE-232	Non-residential uses only.
HCFC-124	FE-241	Non-residential uses only.
[HCFC Blend] B	Halotron 1	Non-residential uses only.
[HCFC Blend] C	NAF P-III	Non-residential uses only.
[HCFC Blend] D	Blitz III	Non-residential uses only.
Gelled Halocarbon/Dry Chemical Suspension	Envirogel	Allowable in the residential use market.
[Surfactant Blend] A	Cold Fire, FlameOut	
Water Mist Systems using Potable or Natural Sea Water		
Carbon Dioxide		
Dry Chemical		
Water		
foam		

**Acceptable Substitutes for Halon 1211 Streaming Agents Subject to Narrowed Use Limits
under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006**

Substitute	Trade Name	Limitations	Comments
[HCFC Blend] E	NAF P-IV	Acceptable in nonresidential uses only.	As with other streaming agents, EPA recommends that potential risks of combustion byproducts be labeled on the extinguisher (see UL 2129). See comments 1, 2.
HFC-227ea	FM-200	Acceptable in nonresidential uses only.	See comments 1, 2
HFC-236fa		Acceptable in nonresidential uses when manufactured using any process that does not convert perfluoroisobutylene (PFIB) directly to HFC-236fa in a single step.	See comments 1, 2, 3
CF ₃ I		Acceptable in nonresidential uses only.	
C ₆ F ₁₄	PFC-614, CEA-614	Acceptable for nonresidential uses where other alternatives are not technically feasible due to performance or safety requirements because of their physical or chemical properties.	Users should observe the limitations on PFC acceptability by making reasonable effort to undertake the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; Documentation of such measures should be available for review upon request. See additional comments 1, 2

**Acceptable Substitutes for Halon 1211 Streaming Agents Subject to Narrowed Use Limits
under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006**

Substitute	Trade Name	Limitations	Comments
C6-perfluoroketone (1,1,1,2,2,4,5,5,5-nonafluoro-4-(trifluoromethyl)-3-pentanone)	Novac 1230	Acceptable in nonresidential uses only.	For operations that fill canisters to be used in streaming applications, EPA recommends the following: - install and use adequate ventilation ; - clean up all spills immediately in accordance with good industrial hygiene practices; and - provide training for safe handling procedures to all employees that would be likely to handle containers of the agent or extinguishing units filled with the agent. See additional comments 1, 2, 4, 5
H Galden HFPEs		Acceptable in nonresidential uses only.	For operations that fill canisters to be used in streaming applications, EPA recommends the following:

- install and use adequate ventilation ;
- clean up all spills immediately in accordance with good industrial hygiene practices;
- and
- provide training for safe handling procedures to all employees that would be likely to handle containers of the agent or extinguishing units filled with the agent.

See additional comments 1, 2, 4, 5

Additional Comments

1. Discharge testing and training should be strictly limited only to that which is essential to meet safety or performance requirements.
2. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
3. Acceptable for local application systems inside textile process machinery.
4. As with other streaming agents, EPA recommends that potential risks of combustion by-products be labeled on the extinguisher (see UL 2129)
5. EPA has no intention of duplicating or displacing OSHA coverage related to the use of personal protective equipment (e.g., respiratory protection), fire protection, hazard communication, worker training or any other occupational safety and health standard with respect to halon substitutes.

Acceptable Substitutes for Halon 1301 Total Flooding Agents Under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006

Substitute	Trade Name	Comments
Powdered Aerosol C	PyroGen, Soyuz	For use in unoccupied areas only.
Powdered Aerosol A	SFE	For use in unoccupied areas only.
Carbon Dioxide		System design must adhere to OSHA 1910.162(b)(5) and NFPA Standard 12
Water		
Water Mist Systems using Potable or Natural Sea Water		
HCFC-22		<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 13.9% while its cardiotoxic LOAEL is 5.0%. Thus, it is unlikely that this agent will be used in normally occupied areas.</p> <p>See additional comments 1, 2, 3, 4, 5, 6</p>
HCFC-124		<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 8.4% while its cardiotoxic LOAEL is 2.5%. Thus, it is unlikely that this agent will be used in normally occupied areas.</p> <p>See additional comments 1, 2, 3, 4, 5</p>
[HCFC Blend] A	NAF S-III	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on full scale testing is approximately 8.6%.</p> <p>The agent should be recovered from the fire protection system in conjunction with testing or servicing, and should be recycled for later use or destroyed.</p> <p>Feasible for use in a normally occupied area.</p> <p>See additional comments 1, 2, 3, 4, 5</p> <p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001</p>

Acceptable Substitutes for Halon 1301 Total Flooding Agents Under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006

Substitute	Trade Name	Comments
HFC-23	FE 13	<p>Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 14.4% while data indicates that its cardiotoxicity NOAEL is 30% without added oxygen and 50% with added oxygen. Its LOAEL is likely to exceed 50%.</p> <p>Feasible for use in a normally occupied area.</p> <p>See additional comments 1, 2, 3, 4, 5</p>
HFC-125	FE 25	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 11.3% while its cardiotoxic LOAEL is 10.0%. Thus, it is unlikely that this agent will be used in normally occupied areas.</p> <p>See additional comments 1, 2, 3, 4, 5</p>
HFC-134a		<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 12.6% while its cardiotoxic LOAEL is 8.0%. Thus, it is unlikely that this agent will be used in normally occupied areas.</p> <p>See additional comments 1, 2, 3, 4, 5, 6</p>
HFC-227ea	FM-200	<p>The comparative design concentration based on cup burner values is approximately 7.0% while data indicate that its cardiotoxicity LOAEL is probably greater than 10.5%. EPA is accepting 10.5% as its LOAEL. Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>This agent was submitted to the Agency as a Premanufacture Notice (PMN) agent and is presently subject to requirements contained in a Toxic Substances Control Act (TSCA) Significant New Use Rule (SNUR).</p> <p>Feasible for use in a normally occupied area.</p> <p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p>

Acceptable Substitutes for Halon 1301 Total Flooding Agents Under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006

Substitute	Trade Name	Comments
IG-100	NN100	<p>See additional comments 1, 2, 3, 4, 5</p> <p>IG-100 systems must include alarms and warning mechanisms.</p> <p>Workplace personnel and employees should not remain in or re-enter the area after system discharge (even if such discharge is accidental) without appropriate personal protective equipment.</p> <p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>See additional comments 1, 2 and 5.</p>
IG-01 (formerly Inert Gas Blend C)	Argotec	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The Agency does not contemplate personnel remaining in the space after system discharge during a fire without Self Contained Breathing Apparatus (SCBA) as required by OSHA.</p> <p>EPA does not encourage any employee to intentionally remain in the area after system discharge, even in the event of accidental discharge. In addition, the system must include alarms and warning mechanisms as specified by OSHA.</p> <p>See additional comments 1, 2, 5.</p>
IG-55 (formerly Inert Gas Blend B)	Argonite	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The Agency does not contemplate personnel remaining in the space after system discharge during a fire without Self-Contained Breathing Apparatus (SCBA) as required by OSHA.</p> <p>EPA does not encourage any employee to intentionally remain in the area after discharge, even in the event of accidental discharge. In addition, the system must include alarms and warning mechanisms as specified by OSHA.</p> <p>See additional comments 1, 2, 5</p>
IG-541	Inergen	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p>

Acceptable Substitutes for Halon 1301 Total Flooding Agents Under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006

Substitute	Trade Name	Comments
		<p>Studies have shown that healthy, young individuals can remain in a 10% to 12% oxygen atmosphere for 30 to 40 minutes without impairment. However, in a fire emergency, the oxygen level may be reduced below safe levels, and the combustion products formed by the fire are likely to cause harm. Thus, the Agency does not contemplate personnel remaining in the space after system discharge during a fire without Self Contained Breathing Apparatus (SCBA) as required by OSHA.</p> <p>Feasible for use in a normally occupied area.</p> <p>This agent contains CO₂, which is intended to increase blood oxygenation and cerebral blood flow in low oxygen atmospheres. The design concentration should result in no more than 5% CO₂.</p> <p>See additional comments 1, 2, 5</p>
<p>Gelled Halocarbon/Dry Chemical Suspension with ammonium polyphosphate additive</p>	<p>Envirogel with ammonium polyphosphate additive</p>	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems, for whichever hydrofluorocarbon gas is employed.</p> <p>Envirogel is listed as a streaming substitute under the generic name Gelled Halocarbon / Dry Chemical Suspension. Envirogel was also previously listed as a total flooding substitute under the same generic name.</p> <p>See additional comments 1, 2, 3, 4, 5.</p>
<p>Foam A (formerly [Water Mist / Surfactant Blend] A)</p>	<p>Phirex+</p>	<p>This agent is not a clean agent, but is a low-density, short duration foam.</p>

Additional Comments

1. Must conform with OSHA 29 CFR 1910 Subpart L Section 1910.160 and 1910.162.
2. Per OSHA requirements, protective gear (SCBA) must be available in the event personnel must reenter the area.
3. Discharge testing should be strictly limited only to that which is essential to meet safety or performance requirements.
4. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
5. EPA has no intention of duplicating or displacing OSHA coverage related to the use of personal protective equipment (e.g., respiratory protection), fire protection, hazard communication, worker training or any other occupational safety and health standard with respect to EPA's regulation of halon substitutes.
6. The NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems gives guidelines for blends that contain HFC-134a or HCFC-22 and other acceptable total flooding agents, rather than referring to HFC-134a or HCFC-22 alone.

<p>C6-perfluoroketone (1,1,1,2,2,4,5,5,5-nonafluoro-4-(trifluoromethyl)-3-pentanone)</p>	<p>Novac 1230</p>	<p>Use of the agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p>
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Acceptable Substitutes for Halon 1301 Total Flooding Agents Under the Significant New Alternatives Policy (SNAP) Program as of March 29, 2006

Substitute	Trade Name	Comments
HFC-125 with 0.1% <i>d</i> -limonene	NAF S 125	<p>For operations that install and maintain total flooding systems using this agent, EPA recommends the following:</p> <ul style="list-style-type: none"> - install and use adequate ventilation ; - clean up all spills immediately in accordance with good industrial hygiene practices; and - provide training for safe handling procedures to all employees that would be likely to handle containers of the agent or extinguishing units filled with the agent. <p>See additional notes 1, 2, 3, 4, 5.</p> <p>Use of the agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>Extinguisher bottles should be clearly labeled with the potential hazards associated with the use of HFC-125 and <i>d</i>-limonene, as well as handling procedures to reduce risk resulting from these hazards.</p> <p>See additional notes 1, 2, 3, 4, 5.</p>
<u>HFC-227ea with 0.1% <i>d</i>-limonene</u>	<u>NAF S 227</u>	<p><u>Use of the agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</u></p> <p><u>Extinguisher bottles should be clearly labeled with the potential hazards associated with the use of HFC-227ea and <i>d</i>-limonene, as well as handling procedures to reduce risk resulting from these hazards.</u></p> <p><u>See additional notes 1, 2, 3, 4, 5.</u></p>
Uni-light Advanced Fire Fighting Foam 1%	Uni-light AFF 1%	<p>For operations that install and maintain total flooding systems using this agent, EPA recommends the following:</p> <ul style="list-style-type: none"> -make self-contained breathing apparatus (SCBA) available in normally occupied areas -wear proper personal protection equipment (impervious butyl gloves, eye protection, and SCBA) - clean up all spills immediately in accordance with good industrial hygiene practices; and - provide training for safe handling procedures to all employees that would be likely to handle containers of foam additive <p>See additional notes 1,2, 6.</p>

Additional Comments

1. Must conform with OSHA 29 CFR 1910 Subpart L Section 1910.160.
2. Per OSHA requirements, protective gear (SCBA) must be available in the event personnel must reenter the area.
3. Discharge testing should be strictly limited only to that which is essential to meet safety or performance requirements.
4. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
5. EPA has no intention of duplicating or displacing OSHA coverage related to the use of personal protective equipment (e.g., respiratory protection), fire protection, hazard communication, worker training or any other occupational safety and health standard with respect to EPAs regulation of halon substitutes.

6. Must conform with OSHA 29 CFR 1910 Subpart L Section 1910.163 and 1910.165

**Acceptable Substitutes for Halon 1301 Total Flooding Agents Subject to Use Conditions
under the Significant New Alternatives Policy (SNAP) Program as of October 1, 2004**

Substitute	Trade Name	Conditions	Comments
Inert Gas/ Powdered Aerosol Blend	FS 0140	For use in normally unoccupied areas only. Any employee who could possibly be in the area must be able to escape within 30 seconds. The employer shall ensure that no unprotected employees enter the area during discharge.	The manufacturer's SNAP application requested listing for use in unoccupied areas only. See additional comment 2.

Additional Comments

1. Must conform with OSHA 29 CFR 1910 Subpart L Section 1910.160.
2. Per OSHA requirements, protective gear (SCBA) must be available in the event personnel must reenter the area.
3. Discharge testing should be strictly limited only to that which is essential to meet safety or performance requirements.
4. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
5. EPA has no intention of duplicating or displacing OSHA coverage related to the use of personal protective equipment (e.g., respiratory protection), fire protection, hazard communication, worker training or any other occupational safety and health standard with respect to EPA's regulation of halon substitutes.

**Acceptable Substitutes for Halon 1301 Total Flooding Agents Subject to Narrowed Use Limits
under the Significant New Alternatives Policy (SNAP) Program as of October 1, 2004**

Substitute	Trade Name	Limitations	Comments
HFC-236fa		<p>Acceptable when manufactured using any process that does not convert perfluoroisobutylene (PFIB) directly to HFC-236fa in a single step:</p> <ul style="list-style-type: none"> - for use in explosion suppression and explosion inertion applications, and - for use in fire suppression applications where other non-PFC agents or alternatives are not technically feasible due to performance or safety requirements: <p>(a) because of their physical or chemical properties, or</p> <p>(b) where human exposure to the extinguishing agents may result in failure to meet safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Extinguishing Systems applicable use conditions</p>	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 6.4%.</p> <p>Users should observe the limitations on HFC-236fa acceptability by taking the following measures:</p> <ul style="list-style-type: none"> (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems. <p>Documentation of such measures should be available for review upon request.</p> <p>The principal environmental characteristic of concern for HFC-236fa is its high GWP of 9400 and long atmospheric lifetime of 226 years. Actual contributions to global warming depend upon the quantities emitted. Feasible for use in a normally occupied area.</p>
C ₃ F ₈	PFC-218, CEA-308	<p>Acceptable for nonresidential uses where other alternatives are not technically feasible due to performance or safety requirements:</p> <ul style="list-style-type: none"> (a) because of their physical or chemical properties, or (b) where human exposure to the extinguishing agents may result in failure to meet applicable use conditions safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Extinguishing Systems 	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>The comparative design concentration based on cup burner values is approximately 8.8%.</p> <p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>Users should observe the limitations on PFC acceptability by taking the following measures:</p> <ul style="list-style-type: none"> (i) conduct an evaluation of foreseeable conditions of end-use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may

**Acceptable Substitutes for Halon 1301 Total Flooding Agents Subject to Narrowed Use Limits
under the Significant New Alternatives Policy (SNAP) Program as of October 1, 2004**

Substitute	Trade Name	Limitations	Comments
C ₄ F ₁₀	PFC-410, CEA-410	<p>Acceptable for nonresidential uses where other alternatives are not technically feasible due to performance or safety requirements:</p> <p>(a) because of their physical or chemical properties, or</p> <p>(b) where human exposure to the extinguishing agents may result in failure to meet applicable use conditions safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Extinguishing Systems</p>	<p>result in failure to meet safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>Documentation of such measures should be available for review upon request.</p> <p>The principal environmental characteristic of concern for PFCs is that they have high GWPs and long atmospheric lifetimes. Actual contributions to global warming depend upon the quantities of PFCs emitted.</p> <p>See additional comments 1, 2, 3, 4, 5.</p> <p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>Users should observe the limitations on PFC acceptability by taking the following measures:</p> <ul style="list-style-type: none"> (i) conduct an evaluation of foreseeable conditions of end-use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems. <p>Documentation of such measures should be available for review upon request.</p> <p>The principal environmental characteristic of concern for PFCs is that they have high GWPs and long atmospheric lifetimes. Actual contributions to global warming depend upon the quantities of PFCs emitted.</p> <p>See additional comments 1, 2, 3, 4, 5.</p>
SF ₆		<p>Only for use as a discharge agent in military applications and in civilian aircraft.</p>	<p>Users should limit testing only to that which is essential to meet safety or performance requirements.</p> <p>This agent is used only to test new Halon 1301 systems.</p>
CF ₃ I		<p>Use only in normally unoccupied areas.</p>	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p>

**Acceptable Substitutes for Halon 1301 Total Flooding Agents Subject to Narrowed Use Limits
under the Significant New Alternatives Policy (SNAP) Program as of October 1, 2004**

Substitute	Trade Name	Limitations	Comments
Gelled Halocarbon/Dry Chemical Suspension with any additive other than ammonium polyphosphate	Envirogel with any additive other than ammonium polyphosphate	Use only in normally unoccupied areas	<p>See additional comments 1, 2, 3, 4, 5.</p> <p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems, for whichever hydrofluorocarbon gas is employed.</p> <p>Envirogel is listed as a streaming substitute under the generic name Gelled Halocarbon / Dry Chemical Suspension. Envirogel was also previously listed as a total flooding substitutes under the same generic name.</p> <p>See additional comments 1, 2, 3, 4, 5.</p>
Halotron II		Use only in normally unoccupied areas.	See additional comments 1, 2, 3, 4, 5.
HFC227-BC		<p>Sodium bicarbonate release in all settings should be targeted so that increased pH level would not adversely affect exposed individuals. Users should provide special training to individuals required to be in environments protected by HFC227-BC extinguishing systems.</p> <p>Each HFC227-BC extinguisher should be clearly labeled with the potential hazards from use and safe handling procedures.</p>	<p>Use of this agent should be in accordance with the safety guidelines in the latest edition of the NFPA 2001 Standard for Clean Agent Fire Extinguishing Systems.</p> <p>See additional comments 1, 2, 3, 4, 5.</p>

Additional Comments

1. Should conform with OSHA 29 CFR 1910 Subpart L Section 1910.160.
2. Per OSHA requirements, protective gear (SCBA) must be available in the event personnel must reenter the area.
3. Discharge testing should be strictly limited only to that which is essential to meet safety or performance requirements.
4. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
5. EPA has no intention of duplicating or displacing OSHA coverage related to the use of personal protective equipment (e.g., respiratory protection), fire protection, hazard communication, worker training or any other occupational safety and health standard with respect to halon substitutes.

**Unacceptable Substitutes for Halon Fire Suppression and Explosion Protection Systems
under the Significant New Alternatives Policy (SNAP) Program as of October 1, 2004**

Substitute	Trade Name	ODS Being Replaced	Reason
CFC-11		Halon 1211 streaming agents	This agent has been suggested for use on large outdoor fires for which non-ozone depleting alternatives are currently available. In addition, CAAA section 610 bans the use of CFCs in portable extinguishers.
HFC-32		Halon 1301 total flooding agents	This agent is flammable.
Chlorobromo-methane (Halon 1011)		Halon 1301 total flooding agents	Other alternatives exist with zero or lower ODP; OSHA regulations prohibit its use as an extinguishing agent in fixed extinguished systems where employees may be exposed. See 29 CFR 1910.160(b)(11).
HBFC-22B1	FM-100	Halon 1301 total flooding agents	HBFC-22B1 is a Class I ozone depleting substance with an ozone depletion potential of 0.74. The manufacturer of this agent terminated production of this agent January 1, 1996, except for critical uses, and removed it from the market because it is a fetal toxin.