

REGULATORY AND PUBLIC OUTREACH UPDATE FOR HALON SUBSTITUTES

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ABSTRACT

This presentation will provide an update of the regulatory activities surrounding halon replacement options and focusing on the NFPA 2001 process and the SNAP Program continuation. In addition, the presentation will describe a number of the public outreach efforts that are taking place in order to help educate end-users, manufacturers, and regulators about issues surrounding the transition from a world with halon to that of a world without halon.

HALON SUBSTITUTES UNDER EPA'S SNAP PROGRAM Regulatory Update

OVERVIEW

- Proposed revision of exposure limits for halocarbon and inert gas agents
 - NFPA 2001 standards
 - EPA and OSHA regulations
 - Status of SNAP rulemakings
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REASONS TO RE-EXAMINE EXPOSURE LIMITS

- Existing standards —EPA, OSHA, and NFPA—may not reflect the latest scientific information
 - Can improve our understanding of safe exposure limits for both halocarbons and inert gases
 - Many substitutes work best at higher concentrations in order to suppress fire quickly and minimize toxic byproducts
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EXPERT PANEL REVIEWS

- Expert panels were convened by EPA in 12/95 to re-examine exposure limits for inert gas and halocarbon substitutes
 - Oxygen panel report from 5/97 meeting gives guidance on safe exposure limits for inert gases
 - Cardiotoxicity panel in 12/95 recommended further research to help establish the use of PBPK modeling in setting exposure limits for halocarbons
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BUILDING CONSENSUS ON CHANGES TO EXPOSURE LIMITS

- Any change in exposure limits needs to reflect a true “risk balanced” standard based on best scientific evidence
 - Any changes should reflect consensus of NFPA, the standard setting group for the fire protection industry
 - EPA to work with NFPA and OSHA in reviewing options for changes and proposing any regulatory change
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PROPOSAL TO REVISE NFPA 2001 EXPOSURE LIMITS

- 9/97, EPA convenes task group to consider changes to exposure limits
 - 1/98, EPA submits public proposal following task group discussion
 - 3/98, Committee voted to accept in principle EPA’s public proposal with editorial changes (ballots due 5/98)
 - Peer review panel to follow on PBPK model (in July)
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NEXT STEPS IN NFPA 2001 REVISION PROCESS

- 7/98, Expert panel reviews use of PBPK model for setting exposure limits for halocarbon fire protection agents
 - Fall, 98, EPA provides report of expert panel on PBPK model
 - 12/98, NFPA 2001 committee meets to act on proposals
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EPA REGULATORY REVISIONS

- Concurrently with NFPA 2001 revision process, EPA will begin rulemaking process to propose consistent changes in SNAP use conditions
 - EPA will coordinate with OSHA to achieve consistency
 - SNAP rulemaking in process now to
 - (1) finalize 5/21/97 proposal
 - (2) propose HCFC Blend E and IG-100 acceptable with use conditions
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