



OFFICE OF ATMOSPHERIC PROTECTION

WASHINGTON, D.C. 20460

May 16, 2025

SENT VIA ELECTRONIC MAIL

Valerii Ivanov
Impulse Storm Ltd

[REDACTED]
fire@impulse-storm.com

Re: Petition for Significant New Alternatives Policy (SNAP) Program Reevaluation of Substitute

Dear Valerii Ivanov:

This letter responds to your petition pursuant to section 612(d) of the Clean Air Act (CAA), received by the U.S. Environmental Protection Agency (the EPA) on February 15, 2025.

The EPA understands this petition as requesting that the Agency either 1) delete Powdered Aerosol E (FirePro) from the SNAP program's acceptable list and add it to the unacceptable list or 2) add use restrictions to Powdered Aerosol E (FirePro)'s acceptability listing issued in October 2018.

The EPA has reviewed the information you provided, including the 2023 Marine Accident Investigation Branch report, which shows carbon monoxide levels in testing in 2020 and 2021 exceeded health-based exposure limits such as the Acute Exposure Guideline Level and the U.S. National Institute for Occupational Safety and Health's Immediately Dangerous to Health and Life value. These carbon monoxide concentrations exceed levels previously reported to EPA during our evaluation of Powdered Aerosol E.

Pursuant to CAA section 612(d) and 40 CFR 82.184, your petition is granted. The EPA intends to reconsider the current listing of Powdered Aerosol E as acceptable. Depending on the results of the EPA's review, the Agency may issue a decision through rulemaking or other public notice.

Thank you for bringing this information to our attention. If you have additional information or would

like to discuss any aspect of your request, please contact Ms. Erin Birgfeld, Technology Transitions Branch Supervisor, at Birgfeld.Erin@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "P. M. Gunning", with a stylized flourish at the end.

Paul M. Gunning, Director
Office of Atmospheric Protection