



May 7, 2007

Mr. Richard Corey
Chief
Research and Economic Studies Branch
Air Resources Board
Sacramento, California

Dear Mr. Corey:

I am writing on behalf of the Halon Alternatives Research Corporation (HARC) in response to the draft report on proposed early actions to mitigate climate change in California. HARC is a non-profit corporation formed in 1989 to promote the development and approval of environmentally acceptable halon alternatives. HARC acts as a clearinghouse for information on halon-related issues and a focal point for industry/government communication and cooperation. Our members include alternative agent manufacturers, equipment manufacturers, distributors, installers, end-users, and industry associations.

The draft report includes in Group 2 a GHG reduction measure focused on the replacement of high-GWP gases used in fire protection systems. Selected HFCs and PFCs are used as extinguishing agents in a limited array of "special hazard" fire suppression and explosion protection applications. The development of these agents for use in fire protection has been instrumental in achieving the accelerated halon production phase out mandated by the Montreal Protocol. Halons are the most potent of the ozone-depleting substances and also have GWPs that are significantly higher than the HFC agents that have predominantly replaced them. Emissions of HFCs and PFCs from fire protection are estimated at less than 1% of total HFC and PFC emissions from all sources

The U.S. fire protection industry fully supports the goal of minimizing non-fire emissions of fire protection agents, and is committed to continuing to contribute to both ozone layer and climate change protection. The overriding concern of the fire protection industry, however, is the reduction of risk to people and property from the threat of fire through the use of products and systems proven to be effective. With the aim of ensuring that both of these goals are achieved, the fire protection industry proactively developed and implemented in 2002 a voluntary code of practice that is intended to focus the industry's efforts on minimizing emissions of HFC and PFC fire protection agents.

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The Voluntary Code of Practice for the Reduction of Emissions of HFC & PFC Fire Protection Agents (VCOP) is a partnership of the U.S. Environmental Protection Agency (EPA), Fire Equipment Manufacturers Association (FEMA), Fire Suppression Systems Association (FSSA), Halon Alternatives Research Corporation (HARC) and National Association of Fire Equipment Distributors (NAFED). The VCOP sets forth recommended practices and strategies to facilitate minimizing non-fire emissions. Enclosed is a document that describes the VCOP in more detail.

Additionally and in conjunction with the VCOP, the fire protection industry proactively developed and implemented a voluntary data collection effort called the HFC Emissions Estimating Program (HEEP). HEEP collects data on sales of extinguishing agents for recharge as a way to estimate annual emissions of HFCs and PFCs from the fire protection industry. The HEEP data is viewed as an important yardstick with respect to industry performance. By these measures the fire protection industry demonstrates its commitment to responsible use of HFCs and PFCs for the protection of life and high-value property. Enclosed is a final report of HEEP data for 2002 and 2003. Data for 2004 and 2005 should be available in the next few months.

Enclosed are two other documents that provide information on the use of high-GWP gases in fire protection systems. One is the fire protection chapter from a special report by the Intergovernmental Panel on Climate Change (IPCC) on issues related to HFCs and PFCs. The other is an assumption sheet for EPA's vintaging model of ODS and ODS substitutes in the US fire protection sector.

Please let us know if you have any questions. We would be glad to discuss this information with you in more detail.

Sincerely,

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Enclosures