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May 27, 2015

Mary D. Nichols, Chairman

Air Resources Board

1001 I Street, PO Box 2815

Sacramento, Ca. 95812

Re: Short-Lived Climate Pollutant Reduction Strategy

Dear Chairman Nichols:

On behalf of Falcon Safety Products, I am writing to submit comments regarding the Short-lived Climate Pollutant Reduction Strategy Concept Paper recently issued by the California EPA Air Resources Board.

Falcon Safety Products, Inc. is a privately owned, 60 year old company located in Branchburg, New Jersey. Our company, which employs 125 people, manufactures and markets aerosol products for the consumer electronics, and marine and industrial safety industry. We thank you for the opportunity to offer comments on the Air Resources Board’s concept paper, as this rule could affect our two core products, marine and industrial safety horns, and compressed-gas dusters – both aerosol products. Falcon Safety Products successfully worked with the Air Resources Board during the first phase of HFC reductions, and we hope to build on that mutual success.

Falcon Safety Products supports the goal of the California Air Resources Board to create an orderly and well thought out phase down of high-GWP HFCs where there are safe, effective, and financially viable alternatives. Our company has had a long standing history of choosing environmentally preferred propellants for our aerosols, often well before they were regulated. In fact, we began our conversion to low GWP gases 20 years ago. We have reduced our HFC emissions (on a GWP basis) by over 90%. At this point, approximately 95% of our aerosol product line uses HFC 152a for its propellant, which has a Global Warming potential of 124. Limits on Volatile Organic Compounds in the state of California makes HFC 152a the best propellant to use in consumer products.

It is our opinion, that the preferred framework to reduce emissions of these gases is through the North American Amendment to the Montreal Protocol. A state-by-state regulatory patchwork creates an extraordinary burden on small companies like Falcon Safety Products. Furthermore, the companies that are affected by these regulations have a 30-year history in successfully controlling the orderly phase down of ozone depleting substances. This was a monumental international success by all accounts. We believe that an amendment to the Montreal Protocol to include the phase down of HFCs is the most flexible, effective, and productive way to limit future climate change effects from these substances. This regulatory framework, if organized correctly, will also allow the marketplace to determine which technologies make the most sense for each application, with a specific focus on finding environmentally superior alternatives.

The language in the ARB concept paper acknowledges that the foam and aerosol industry has already made a significant transition away from high-GWP compounds. For aerosols, especially in California, where there are strict limits on VOCs, HFC 152a is the best alternative currently available for consumer products. While there are products available which use a lower GWP propellant, HMO 1234ze for example, the cost of this gas is too high to be absorbed by the low overall cost of consumer products, rendering it unsalable in most cases. The projected high cost of this substitute might force manufacturers to utilize blends of gases to lower the cost.

**Compressed Gas Dusters**

In 2006, Falcon Safety Products worked with the Air Resources Board to craft the definition of Pressurized Gas Duster in the Regulation for Reducing Emissions from Consumer Products. The term “Energized Equipment Use Only” was added to the labelling of dusters filled with non-flammable HFC 134a. These products are specialized dusters that are used in a variety of professions that require a fully non-flammable gas. We believe that this regulation has been effective in California in limiting the use of the specialty application dusters.

**Compressed Gas Signal Horns**

Falcon Safety Products manufactures and markets safety horns for marine and industrial uses. Currently, the predominant propellant used in our horns is HFC 134a. With this product category, it is vitally important to use a non-flammable propellant, especially for use with emergencies that involve fire or explosions. These horns are used for facility evacuations, often fire related, and marine emergencies. A U.S. Coastguard and Department of Homeland Security Report titled “Recreational Boating Statistics for 2012” shows that there were 264 incidents of fire and/or explosion on all types of recreational vessels reported to the Coast Guard in 2012. This is not an insignificant statistic. This is important especially in California, which enjoys a large recreational and commercial marine industry.

The alternative for non-flammability, HFO 1234ze, is currently being sold in horns in very limited quantities, but needs further evaluation for use in high temperature situations. The material data safety sheet (MSDS) for Solstice 1234ze states “Product is not combustible under normal conditions. However, this material can ignite when mixed with air under pressure and exposed to strong ignition sources.” Additionally, this is three to four times the cost of HFC 134a, and could encourage unsafe use of horns designed for sporting events, which are typically filled with extremely flammable hydrocarbons. The transition to HFO 1234ze is also very expensive for small companies, like Falcon, to change tanks, filling lines, labels, marketing materials, etc. Also of note, HFC 152a is not considered a feasible alternative for non-flammable safety horns.

We thank you for the opportunity to submit comments to California EPA, and remain dedicated to supporting the global phase down of high GWP gases, as long as the transition is done in a realistic time-frame and takes into consideration the safety, efficacy, and financial implications of such a transition.

Sincerely,

Philip M. Lapin

President/CEO Falcon Safety Products, Inc.