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CONFIDENTIAL

Philip M. Lapin
Ky Asral
Chief, Bureau of Sustainability
New Jersey Department of Environmental Protection
PO Box 402
Trenton, NJ 08625

March 6, 2020

Re: Greenhouse Gas monitoring and Reporting Rule

Falcon Safety Products, Inc. is a specialty aerosol manufacturer. Our feature products are compressed gas dusters and portable gas powered safety horns. Our Branchburg location is our only manufacturing location from which we ship our products throughout the US and export to many countries overseas. We employ between 50 and 100 people at our plant in Branchburg. We have some comments on your plans to collect data on the emissions of HFCs from our aerosol products:

1. We manufacture aerosols in our plant and sell them to many customers in the US and Canada. Many of our customers are mega retailing entities with locations in every state in the US. Our products are emitted where they are used. We estimate that about 2%-3% of our gas usage (gas put in cans) is emitted in New Jersey by consumers using our products. Please do not plan to use the total gas purchases we make as an indicator of our emissions in New Jersey.
2. In order to operate in the State of New Jersey we need an Air Permit that we get from your agency. To get that permit we report the emissions from production of our aerosols in our plant as part of the can filling process. Those data are already in possession of the NJDEP Emissions Unit. We feel that single reporting should be adequate for the purposes. That gas represents around 1% of our total gas purchases.
3. The main gas we use (HFC 152a) as our propellant is recognized as having the lowest GWP (Global Warming Potential) of HFCs appropriate for aerosol use. In most regulatory programs that have been enacted in the US, aerosols using gases with a GWP of less than 150 are allowed for use in aerosols. HFC 152a has a GWP of 122. We suggest that HFC 152a not be encumbered by regulation in the future.

Thank you very much for allowing comment on your plans. Please get in touch if you wish to discuss.

Sincerely yours,

Philip M. Lapin, Pres./CEO