



September 17, 2013

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95912
via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

Maxima Racing Oils appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

Maxima Racing Oils is a California based company and specialty manufacturer of lubricants for the Powersports industry. Founded in 1979, Maxima primarily formulates and sells products to the racing market.

Maxima has the following comments:

- Maxima supports the change to the Gear, Chain or Wire Lubricant definition to add the exemption for lubricant used on chain driven vehicles. This exemption is needed to preserve products that are solely used on chain driven vehicles. Products made specifically for chain driven vehicles are unique in their formulation. These products would not have performed if the 25% VOC limit was imposed on them, and could have caused safety issues.
- Maxima supports the addition of the Single Use Cleaner and Single Use Degreaser definition. Most of our products are developed for racing. These definitions clearly indicate that products we produce for a single use are not regulated under the General-purpose category. This change will provide clarity for the Industry.
- Maxima supports the extension of the Multi-purpose Lubricant VOC limit from 12/31/2015 to 12/31/2018. This change was needed to provide Industry more time to meet this very stringent limit.
- Maxima also supports the scientific studies that CARB will be performing on the Low Vapor Pressure compounds. The LVP provision is extremely important. Further reformulation options will use LVP compounds.



In conclusion we appreciate the staff reviewing our comments and willingness to meet with us and consider our technical data. Carla Takemoto and her staff took the time to meet with us on this important issue.

Thank you for your consideration to these comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or at djraymond@reg-resources.com.

Sincerely,

A handwritten signature in black ink that reads 'D. Massie'. The signature is written in a cursive style with a large, stylized 'D' and a small 'M'.

Cc: Carla Takemoto, Air Resources Board
Doug Raymond, Raymond Regulatory Resources (3R), LLC