



September 23, 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:

Motul USA, Inc. 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.

Motul USA Inc. a California based Corporation established in 1989, and is a subsidiary of Motul Lubricants based in Europe. Motul USA is an importer of high quality lubricants, specialty fluids and specialty aerosols for the Powersports industry (Motorcycles, ATV, Utility Vehicles, Scooters, Etc.). Motul is one of the world's leader in the Motorcycle market both on and off road.

Motul has these specific comments:

- Motul supports the inclusion of an exemption for chain driven vehicles into the Gear, Chain or Wire Lubricant definition. This exemption will provide Motul with the opportunity to continue to produce high quality effective products that will solely be used on chain driven vehicles. This change adds clarity to the regulation.
- Motul supports the changes to the Dry Lubricant definition, which clarifies that Dry Lubricants are not regulated no matter what the use is. This clarification was needed to ensure that the unique characteristics of the dry lubricant are not compromised by different category VOC limits.
- Motul supports the Multi-purpose Lubricant future effective limit delay. The VOC limit is to become effective on 12/31/2015. More time was needed for research. Staff has delayed the VOC limit to 12/31/2018. This additional time is needed to develop technology to meet this stringent limit.



- Motul supports the addition of Single Use Cleaner and Single Use Degreaser definitions. Motul sells product for the motorsports industry. Most of our products are targeted toward specific uses and are not general-purpose products. This addition of these definitions clarifies the intent of the regulation.
- Motul also supports the staffs' decision to pursue scientific studies on the Low Vapor Pressure (LVP) compounds. The LVP provision is vital to our formulations. We look forward to working with the staff on this issue.

In conclusion Motul supports the amendments to the Consumer Products regulation. 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](mailto:djraymond@reg-resources.com).

Sincerely,

Dave Wolman  
President

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