



FINISH LINE TECHNOLOGIES, INC.

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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:

Finish Line Technologies 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.

Finish Line is a 25 year old company that is focused almost exclusively on making products for the lubrication and cleaning of bicycles. The most significant products in this niche relate to bicycle chain cleaning and bicycle chain lubrication.

Finish Line has several specific comments on the amendments:

- Finish Line supports the addition of the Single Use Cleaner and Single Use Degreaser definitions. Finish Line produces product specifically and solely for degreasing Bicycle chains and gears. They are designed to clean and degrease the heavy grunge that builds up on these parts (These parts are critical to the bicycle's performance, yet extremely difficult to degrease.) Our bicycle degreasers are not General Purpose products. The addition of these definitions will provide Finish Line the ability to sell much needed high performing bicycle chain and gear degreasing products to cyclists.
- Finish Line supports the exemption for chain driven vehicles from the Gear, Chain and Wire Lubricant definition. As stated above our products are unique in that they are designed specifically for use on chain driven bicycles. This exemption allows us to provide effective products for use on bicycle chains. Lubricating the chain on a bicycle is vital to the bicycle's performance. Given the extremely exposed environments in which bicycles are often used (off road and on road), unique bicycle-specific technologies are required for their lubrication (Often times, these technologies require VOC carriers). Finish Line naturally tries to encourage the use of bicycles, and without these specialty lubricants, bicycle usage would be lessened. Increasing bicycle usage will assist California in its effort to provide clean air.
- Finish Line supports the changes to the Multi-purpose lubricant and Dry lubricant definitions. The single use addition to the Multi-purpose lubricant definition is needed to clarify products designed for a single use which are not subject to the Multi-purpose


lubricant standard. Likewise the Dry lubricant definition change clarifies that Dry lubricants are not subject to other lubricant category VOC limits.

- Finish Line is in support of the Multi-purpose lubricant future effective VOC limit extension from 12/31/2015 to 12/31/2018.
- Finish Line supports the staff stance on the Low Vapor Pressure (LVP) compounds being subject to a scientific study. The LVP provision is needed for our formulations to meet current VOC limits.

In conclusion we appreciate the staff's willingness to review Industry's technical data. We support the current amendments to the Consumer Products Rule.

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

Sincerely,



Henry J. Krause
President, CEO

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