



**FINISH LINE**

**FINISH LINE TECHNOLOGIES, INC.**

50 Wireless Blvd

Hauppauge, NY 11788

Tel: 631-666-7300 • Fax: 631-666-7391

[www.FinishLineUSA.com](http://www.FinishLineUSA.com)

May 3, 2018

To: Clerk of the Board

Cc: Dan Garrett

Ravi Ramalingam

Joe Calavita

Jose Gomez

Subject: Multi-purpose Lubricant Amendments

Finish Line appreciates the opportunity to comment on the Amendments to the Consumer Products Regulation. These amendments include changes to the category of Multi-purpose lubricants future effective limit.

Finish Line is a 30 year old company that is focused on making products for the lubrication and cleaning of bicycles. However, we also manufacture general purpose lubricants under license for DuPont corporation, and these are sold into non-cycling channels.

Finish Line supports the staff proposal of a product weighted Maximum Incremental Reactivity (MIR) limit of 0.45 with a maximum VOC level of 25%. The use of the Concept of Reactivity in the reduction of ozone formation is sound science. The reduction in an MIR level in a product always results in an ozone reduction. This is not the case for Mass based regulations. Thus CARB staff should consider Reactivity options for more Consumer Products.

Finish Line supports the delay of the future effective limit until 7/1/2019. In addition Finish Line supports the sunset of the sales reporting this will reduce the burden of reporting for manufacturers.

Conclusion

Finish Line supports the amendments proposed by the staff for the Alternative Option to comply. Finish Line commends the staff on their work on this issue.

Any questions or comments feel free to contact our consultant Doug Raymond at 740-936-8120 or by e-mail at [djraymond@me.com](mailto:djraymond@me.com).

Sincerely,

A handwritten signature in cursive script that reads "Henry J. Krause". The signature is written in black ink and has a long, sweeping tail that extends to the right.

Henry J. Krause  
President