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March 20, 2020

**VIA ELECTRONIC MAIL**

John P. Kinsey  
Wanger Jones Helsley PC  
265 E. River Park Circle, Suite 310  
Fresno, CA 93720  
E-Mail: jkinsey@wjhattorneys.com

Re: **Response to Inland Star Distribution Centers, Inc.  
Request for Formal Interpretation and/or Text Amendment**

Dear Mr. Kinsey:

I am in receipt of your letter dated February 21, 2020, regarding Inland Star's Request for Formal Interpretation and/or Text Amendment ("Letter"). Please note that although the Letter states it was sent via email and U.S. mail, I did not receive any emailed copy of the Letter. Instead, I only received a mailed copy of the Letter, which my office received on Monday, February 24, 2020.

The Letter requests, on behalf on Inland Star: (1) pursuant to Carson Municipal Code ("CMC") Section 9172.11(A), a text amendment to CMC Section 9141.1; or (2) in the alternative, pursuant to CMC Section 9172.24, an interpretation of CMC Section 9141.1. The Letter also requests a stay of enforcement by the City against Inland Star pending the outcome of the requested text amendment or interpretation process.

Firstly, the City does intend to consider a text amendment to CMC Section 9141.1, and deems that process initiated by your request pursuant to CMC 9172.11(A). As you know, this process calls for the matter to be considered at a Planning Commission hearing within 13 months from receipt of the request. (CMC §9172.11(B)). Inland Star's request (i.e., the Letter) was received on February 24, 2020, so the Commission hearing would, under normal circumstances, need to take place on or before March 24, 2021.

However, as you can certainly imagine, the City is not currently operating under normal circumstances. In December of 2019, an outbreak of respiratory illness due to a novel coronavirus (COVID-19) was first identified in Wuhan City, Hubei Province, China. On March 4, 2020, Governor Gavin Newsom declared a State of Emergency for the State of California, and on the same date, the County of Los Angeles declared a health emergency related to COVID-19. On March 11, 2020, the World Health Organization declared COVID-19 a global pandemic. On March 13, 2020, President Trump declared a National State of Emergency in response to increased spread of COVID-19.

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**EXHIBIT NO. 2D**

**EXHIBIT NO. 4**

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On March 17, 2020, the City Council declared and proclaimed a state of emergency in the City of Carson in response to COVID-19. In connection with this declared state of emergency, the City (including the Planning Division) is experiencing a severe decrease in staffing, and the remaining workforce is dedicated to emergency operations to enable the City to provide the most effective possible response to the COVID-19 pandemic for the protection of the health, safety and welfare of the City's residents. Additionally, the regularly scheduled March 24, 2020, Planning Commission meeting has been cancelled, and subsequent Planning Commissions may be held less frequently than usual or may not be held for a period of time. The emergency declaration period will remain in effect until its termination is proclaimed by the City Council, a period which is currently indefinite.

Based on the foregoing, please understand that normal City operations have been interrupted. Accordingly, the City finds it necessary to deem the 13-month timeframe under CMC Section 9172.11(B), and any other related timeframes or deadlines applicable to Inland Star's request for a text amendment to CMC Section 9141.1, to be extended by the period of time that the City's emergency declaration remains in effect. As such, the timeframes have been frozen as of March 17, 2020, and when the local emergency declaration is lifted and normal City operations recommence, the running of the 13-month timeframe will resume. Please confirm you acknowledge the necessity of this arrangement, and thank you in advance for your cooperation as the City responds to this global health crisis.

In response to the Letter's alternative request for an interpretation of CMC Section 9141.1 pursuant to CMC Section 9172.24, the City will deem this request to be ineffective in light of City's initiation of the text amendment process, as stated above, and the fact that the interpretation request is phrased as an alternative to the text amendment request. However, it is likely that the City will nonetheless proceed at some point with an interpretation of CMC 9141.1 upon initiation by the Director pursuant to Section 9172.24(A). In that event, the Director, within 30 days of initiating the interpretation process, would be required to prepare a written interpretation and transmit it to the Planning Commission and the City Council, and to give public notice of preparation of the interpretation, all as set forth in CMC Section 9172.24(C). It is not currently known if or when the Director will initiate this process (and now is not an ideal time in light of the current declared state of emergency), but once any such process has been initiated and an interpretation has been prepared by the Director, Inland Star will be notified of same via the public noticing procedures set forth in CMC Section 9172.24(C).

Finally, in response to Inland Star's request for a stay of enforcement, the City has not taken any formal action this regard. However, the City has confirmed with the Los Angeles County Fire Department, in its capacity as the City's Certified Unified Program Agency, that the warehouse inventory of Inland Star's Carson facility, as inspected on December 18-19, 2019, did not contain any CalARP regulated substances. The City certainly appreciates this positive step in Inland Star's transition to being a non-hazardous materials storage facility, and the City looks forward to Inland Star's continued cooperation in this regard moving forward.

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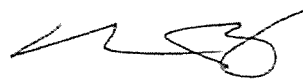
However, this does not mean that Inland Star's warehouse inventory as inspected on December 18-19, 2019, has been confirmed to be in compliance with the CMC or the agreement entered into between the City and Inland Star dated September 5, 2019 ("Agreement"), which go further than merely requiring Inland Star to refrain from having CalARP regulated substances. For instance, there may be materials in Inland Star's inventory that require a conditional use permit or other land use permit or approval not held by Inland Star in order to be legally stored in the MH zone, or that are prohibited for storage in such zone by the permissive zoning doctrine. And of course, Inland Star still lacks a City business license.

The City is continuing to analyze the compliance documentation submitted by Inland Star on February 21, 2020, and is also aware that making a final compliance determination may depend on the outcome of a text amendment to or an interpretation of CMC Section 9141.1. Therefore, while the City has not taken any formal action to grant or deny the requested stay of enforcement, and reserves all rights and remedies pursuant to the CMC, the Agreement, and other applicable law, it is my understanding that the City does not intend to initiate or pursue adverse code enforcement action against Inland Star at this time.

It is my sincere hope that the City (and the rest of the world) will soon be able to move past the COVID-19 emergency period and proceed with the text amendment consideration process, and potentially the interpretation process, in order to provide greater clarity regarding the requirements of CMC 9141.1 and a final compliance determination as soon as possible. Thank you for your consideration of these important matters and please do not hesitate to contact me if you have any questions, comments or concerns.

Regards,

ALESHIRE & WYNDER, LLP



Benjamin R. Jones, Assistant City Attorney

BRJ:BRJ

cc: Sunny K. Soltani, City Attorney ([ssoltani@awattorneys.com](mailto:ssoltani@awattorneys.com))  
Saied Naaseh, Community Development Director ([snaaseh@carson.ca.us](mailto:snaaseh@carson.ca.us))

Enclosure: Letter dated February 21, 2020, from John Kinsey to Benjamin Jones re: Inland Star Distribution Centers, Inc., Request for Formal Interpretation and/or Text Amendment.

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February 21, 2020

**VIA U.S. MAIL & EMAIL: [bjones@awattorneys.com](mailto:bjones@awattorneys.com)**

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18881 Von Karman Avenue, Suite 1700  
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Re: Inland Star Distribution Centers, Inc.  
Request for Formal Interpretation and/or Text Amendment

Dear Mr. Jones:

As you are aware, my law firm represents Inland Star Distribution Centers, Inc. ("Inland Star"), in connection with its interactions with the City of Carson (the "City") concerning its facility in Carson, California, located at 2132 E. Dominguez Building "A" (the "Carson Facility").

It is my understanding that, at the December 18, 2019, meeting/inspection at the Carson Facility, you and Mr. Cardella discussed potential pathways to help resolve some of the ambiguities and outdated language in Section 9141.1 of the Carson Municipal Code ("CMC")—and the CMC's application to the Carson Facility—in a manner that is vetted publicly and evenhandedly applies to all industrial land uses in the City, and helps resolve any concerns the City may have concerning the storage of particular materials. I understand two of the potential solutions discussed were a text amendment and text interpretation pursuant to Section 9172.24 of the CMC.

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Benjamin R. Jones, Esq.

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To help move this matter forward in a constructive manner, I am writing on behalf of Inland Star to request that the City initiate a public process—including either a text amendment or a text interpretation—to resolve the ambiguities present in Section 9141.1 of the CMC. In addition, now that all hazardous corrosives, oxidizers, toxics, flammables, poisons, and CalARP materials have been removed from the Carson Facility such that Inland Star would not be subject to H-3 or H-4 occupancy requirements or need a conditional use permit for its operations, Inland Star requests a stay of enforcement for Inland Star's Carson Facility pending the conclusion of the text amendment/interpretation process, along with a reasonable period to comply with the outcome of that process.

To help facilitate this process, our firm and Inland Star took the liberty of summarizing the steps necessary to resolve the ambiguities in Section 9141.1 of the CMC.

**A. Text Amendment**

Because Section 9141.1 of the CMC is outdated, and contains numerous ambiguities, Inland Star believes the best way to resolve the above issues would be through a text amendment.

As provided in CMC section 9172.11, “[c]onsideration shall be initiated by order of either the Council or Commission, or upon the written request of any person.” (CMC § 9172.11(A).) “When consideration has been initiated by the written request of any person, the matter shall be considered at a Commission hearing held within thirteen (13) months from receipt of the request.” (CMC § 9172.11(B).) Please consider this letter a written request pursuant to Section 9172.11(A).

Of course, there are any number of ways the City would amend the text of Section 9141.1 to provide clarity to the regulated public. However, the simplest way to strike to a balance between achieving the City's objectives of promoting health, safety, and welfare and allowing storage facilities sufficient flexibility to engage in standard business practices would be to modify Section 9141.1 to allow storage facilities as a “by right” land use so long as CalARP-regulated materials are not stored onsite. If any landowner seeks to store CalARP-regulated materials, such use would require a Conditional Use Permit.

Alternatively, the City could specifically authorize the storage of materials that are typically used in the manufacturing process for other industrial “by right” uses. For example, many of the “by right” manufacturing uses require the application of paints, tints, dyes, resins, sealants, and epoxy adhesives—which those industrial users must store onsite prior to their use in the manufacturing process. By analogy, those materials should be acceptable to store as a matter of right. In addition to (i) paints, tints, and epoxy adhesives, other categories of stored materials that are commonly used in “by right” industrial users under Section 9141.1 include (ii) cosmetics, hygiene, and personal care products; (iii) materials used for foods, including additives, reducing/whitening agents, preservatives, vitamins, and disinfectants; (iv) rubber products and materials used for the manufacturing of such products, including lubricants and antioxidants; (v) industrial use paper; (vi) ceramics; (vii) medical or personal care products, such

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as shampoo and cosmetics, and other household items not listed in Section 9141.1; (viii) animal fees; and (ix) and other non-CalARP materials used in “by right” industrial processes.

**B. Text Interpretation**

Alternatively, the City could seek a text interpretation of Section 9141.1, pursuant to Section 9172.24 of the CMC. This process is specifically acknowledged in Section 9141.1, which notes the complexity of industrial uses, and the fact that uncertainties would no doubt arise:

*Note: in the following list, industrial activities are classified by product, by materials used, by use, and by processes employed. Since many industrial uses are complex in nature, it is necessary to consider all of the above-mentioned elements in classifying any specific industrial use. Uncertainties as to the proper classification for a specific use are to be resolved through Interpretations adopted in accordance with CMC 9172.24.*

(CMC § 9141.1 [emphasis added].)

Outlining the process for a formal interpretation of the CMC’s provisions, Section 9172.24 provides:

*In case of uncertainty or ambiguity as to the meaning or intent of any provision of this Chapter, or to further define or enumerate the uses permitted in the various zones, and upon proper initiation as provided in CMC 9172.24(A), the following procedure shall be followed if a Text Change is not initiated. Adjustment of a zoning boundary up to fifty (50) feet from the scaled location on the Zoning Map also may be accomplished under this procedure if a Zone Change is not initiated and if such adjustment is in order to conform to lot lines or to resolve uncertainty as to the precise location of such zoning boundary. Except in the case of a Zoning Boundary Adjustment, Interpretations shall be generally applicable to all future situations of the same type and shall not be limited or directed to specific properties or circumstances thereon.*

(CMC § 9172.24 [emphasis added].) The interpretation process may be initiated “upon the written request of any person.” (CMC § 9172.24(A).) The interpretation “shall be based on an examination of the intent of this Chapter, considering all of the relevant provisions thereof, and shall be consistent with such intent.” (CMC § 9172.24(B).) “Consideration shall be given to the relationship among regulations of the various zoning classifications and the uses and development standards therein.” (*Id.*) “In the case of an Interpretation involving further definition or enumeration of uses permitted in a particular zone, *consideration shall be given to*

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Benjamin R. Jones, Esq.

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*the similarities and differences between the characteristics of each use subject to Interpretation and the characteristics of those uses expressly permitted in the zone.” (Id. [emphasis added].)*

Accordingly, in the event the City does not seek a text amendment, please consider this letter a written request by Inland Star for the City to initiate the CMC interpretation process for Section 9141.1 of the CMC, pursuant to Section 9172.24.

**C. Stay of Enforcement**

As you are aware, Inland Star has removed all hazardous corrosives, oxidizers, toxics, flammables, poisons, and CalARP materials from its Carson Facility. As such, there is no immediate concern about the presence of hazardous substances onsite.

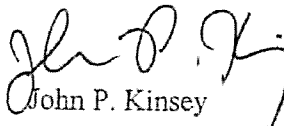
Therefore, to allow the City, Inland Star, and the public an opportunity to meaningfully engage in a public process to articulate clear, generally-applicable standards for industrial uses—and in particular storage and distribution facilities—Inland Star respectfully requests a stay of enforcement pending the outcome of either a text amendment or text interpretation process by the City. In light of the recognized ambiguities in the CMC, Inland Star’s removal of the CalARP and otherwise hazardous materials from the Carson Facility, and the need to articulate clear generally-standards for *all* industrial uses, Inland Star believes this request is both equitable and justified under the circumstances.

**D. Conclusion**

Thank you for consideration of the above requests. Inland Star looks forward to a productive dialog between the City, Inland Star, and other stakeholders.

Please do not hesitate to contact my office if you have any additional questions.

Very truly yours,

  
John P. Kinsey

Curid	Item#	Description/Name	Uses (Site & I of SDS)	Level of coating, material, adhesives, tending agents, composite materials	Anticoag	Use/Color/General Applications (Google, Wikipedia)	CENS Repeatable CAS#	% Percentage	CMC Reusability Reason # (See Explanations Sheet 2)
721	140601557	DYMAHD D-506F					7631-86-9	5%	1,3
720	99001359	8171035 F RED OXIDE		Aqueous colorant	Paints, epoxy adhesives	1333-372-1, 107-21-1	60%, 30%	1,3	1,3
730	99001371	8171800 C YELLOW OXIDE		Aqueous colorant	Paints, epoxies	14807-96-6	5%	1,3	1,3
710	99003427	8341103 BURNT UMBER		Non-aqueous colorant	Paints, epoxies	1309-37-1, 14807-96-6, 8052	13%, 7%, 5%	1,3	1,3
710	99003130	8302934 PERM RED		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6	40%, 40%	1,3	1,3
847	CF00018	8309394 PERM RED		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6	40%, 40%	1,3	1,3
730	99003348	8310147 VENETIAN RED		Aqueous colorant	Paints, epoxies	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 1%	1,3	1,3
710	99003175	8302506 INTERIOR YELLOW		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
847	CF00018	8302506 INTERIOR YELLOW		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
710	99003184	8307216 PHTHALO BLUE		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6	40%, 40%	1,3	1,3
847	CF000408	8307216 PHTHALO BLUE		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6	40%, 40%	1,3	1,3
730	99003386	8308895 VIOLET		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
847	CF000438	8308895 VIOLET		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
710	99003388	8309907 LAMP BLACK		Aqueous colorant	Paints, epoxies	1333-86-4, 107-21-1, 14807-96-6	40%, 30%, 20%	1,3	1,3
847	CF000468	8309907 LAMP BLACK		Aqueous colorant	Paints, epoxies	1333-86-4, 107-21-1, 14807-96-6	40%, 30%, 20%	1,3	1,3
710	99003410	8329501 CARBON BLACK		Non-VOC Aqueous colorant	Paints, epoxies	1333-86-4, 7668-41-7	60%, 1%	1,3	1,3
710	99003432	8315124 GP GOLD SE		Aqueous colorant	Paints, epoxies	1309-37-1, 12001-26-2	3%, 20%	1,3	1,3
710	99003456	8300501 TITANIUM WHITE		Non-aqueous colorant	Paints, epoxies	107-21-1	10%	1,3	1,3
710	99003499	8309260 CARBON BLACK M		Non-aqueous colorant	Paints, epoxies	1333-86-4	30%	1,3	1,3
710	99004011	8770019 AQUASPERSE II T WHIT		Aqueous colorant	Paints, epoxies	14807-96-6	10%	1,3	1,3
710	99004030	8707871 AQUASPERSE EAST RED		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 64-171	30%, 30%, 1%	1,3	1,3
730	99004033	8770801 NAPHTHOL RED		Aqueous colorant	Paints, epoxies	14807-96-9	5%	1,3	1,3
730	99004045	8771114 BURNT UMBER		Aqueous colorant	Paints, epoxies	14807-96-9	40%, 3%, 1%	1,3	1,3
847	CF03128	8771314 BURNT UMBER		Aqueous colorant	Paints, epoxies	1309-37-1, 1333-86-4, 8052	40%, 3%, 1%	1,3	1,3
730	99004049	8771403 RAW UMBER		Aqueous colorant	Paints, epoxies	1309-37-1, 14807-96-6, 1333	40%, 10%, 3%	1,3	1,3
847	CF03128	8771403 RAW UMBER		Aqueous colorant	Paints, epoxies	1309-37-1, 14807-96-6, 1333	40%, 10%, 3%	1,3	1,3
730	99004052	8771575 BROWN OXIDE		Aqueous colorant	Paints, epoxies	86-4, 8052-41-3	1%	1,3	1,3
710	99004066	8772010 AQUASPERSE II RAW UMBER		Aqueous colorant	Paints, epoxies	107-21-1	10%	1,3	1,3
847	CF03140P	8772010 AQUASPERSE II RAW UMBER		Aqueous colorant	Paints, epoxies	107-21-1	10%	1,3	1,3
730	99004076	8772501 AQUASPERSE II CAR VIOLET		Aqueous colorant	Paints, epoxies	1309-37-1, 1333-86-4, 8052	40%, 3%, 1%	1,3	1,3
710	99004103	8773503 ULTRAVIOLET BLUE		Aqueous colorant	Paints, epoxies	107-21-1, 126-73-8, 14807-96-6	10%, 5%, 1%	1,3	1,3
847	CF03159P	8773503 ULTRAVIOLET BLUE		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6	10%	1,3	1,3
710	99004112	8778895 AQUASPERSE II CAR VIOLET		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
847	CF03188P	8778895 AQUASPERSE II CAR VIOLET		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
710	99004115	8779908 AQUASPERSE II LAMP BLACK		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
847	CF03191P	8779908 AQUASPERSE II LAMP BLACK		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
730	99004116	8779908 AQUASPERSE II LAMP BLACK		Aqueous colorant	Paints, epoxies	107-21-1, 14807-96-6, 126	40%, 40%, 3%	1,3	1,3
710	99004130	8779910 HS BLACK		Aqueous colorant	Paints, epoxies	1333-86-4	60%	1,3	1,3
730	99004137	8779910 HS BLACK		Aqueous colorant	Paints, epoxies	1333-86-4	60%	1,3	1,3
710	99004150	8781046 AQUATEND II RED OX		Aqueous colorant	Paints, epoxies	1333-86-4, 107-21-1	60%, 30%	1,3	1,3
847	CF03168422B	8781046 AQUATEND II RED OX		Aqueous colorant	Paints, epoxies	1333-86-4, 107-21-1	60%, 30%	1,3	1,3
730	99004152	NOVOPERM RED FPK		Colored Agent	Paints, epoxies	1333-86-4, 14807-96-6	5%, 10%	1,3	1,3
782	0250_33-142-060	MAX-304015		Protection transparency UVA	Composites, Personal Care products	14807-96-6	13%	1,3	1,3
782	12-101-015	SPHERON L 1500		Silica white bead for slip, spreadability	Composites, Personal Care products	1314-13-2	90%	3	3
782	09-101-020	SHERITE P18		Pigment extender, bulk filler	Composites, Pharmaceutical excipients	7631-86-9	100%	3	3
782	12-101-015	SPHERON L C-KVA		Silica white bead for slip, spreadability	Composites, Pharmaceutical excipients	12001-26-2	100%	3	3
808	SNB5	SODIUM METABISULFITE		Food additive	Composites, Pharmaceutical excipients	7631-86-9	100%	3	3
789	4986591	VARPER AP-2		Polymeric processing aid	Antioxidant for rubber products such as tires	117-81-7	30%	2	2
789	0230501	AGENTE SUPERLIX SOLID G		Antioxidant	Antioxidant for rubber products such as tires	7631-86-9, 122-39-4	25%, 20%	2	2



836	CLP22164964P	HOST/INTI BLK A-1100	Colant preparation	Time, paints	1333-86-4	25%	1
836	CLP2992904P	HOST/INTI BLK LAMP BLACK	Colant Agent	Time, paints	1333-86-4	10%	1
836	CLP2992904P	KONASU K-5000	Flow agent, filler	Coatins, adhesives, sealants, cementics	7631-86-9	10%	1, 2, 3
847	FCG5SW704035B	SASOL/WAX 7040	Anti-fanning agent	Industrial use paper	8003-76-2	92%	4
847	RTV2140	BYVOCOR CJ1355	Concrete inhibiting pigment	Protective coating systems (anti-oxid)	1311-81-2	25%	1
847	RTV230	PYRAX B	Adhesive/filler	Cementics, Paints	12601-26-2	25%	1
847	RTV460	VANITAC 6H	Adhesive/filler	Cementics, Paints	14807-96-6	98%	1
847	RTV930	VANSEL W-30	Adhesive	Cementics	13983-17-0	99%	1
839	50491815	ZE41 INGOT	Industrial fabrication	Casting, welding	7439-95-4	87%	4
865	DJG6M66037	DRY VITAMIN ACETATE	Vitamin	Vitamins	128-37-0	3%	3
816	DU1015-57	DIKROPYLENE GLYCOL MONOMETHYL ETHER	Solvent	Used in paints, paper, dyes, resin, brake fluids and ink, and in making cementics	34590-91-8	100%	1
816	DU1015-57	DEE FO 1015	Anti-fanning agent	commonly used for architectural, industrial and wood coatings, as well as priming inks and adhesives	7631-86-9	3%	1
816	DU1015-57	DEE FO 1015	Anti-fanning agent	well as priming inks and adhesives	7631-86-9	3%	1
730	9904231	COL OR TREND RED OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF04B10	COL OR TREND RED OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904232	COL OR TREND RED OXIDE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904263	COL OR TREND BRN OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF04840	COL OR TREND BRN OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
710	9904364	COL OR TREND BRN OX	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904276	COL OR TREND YELLOW OXIDE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904299	COL OR TREND RAW UNMBER	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1309-37-1, 1333-86-4	70%	1, 3
847	CF0491L	COL OR TREND RAW UNMBER	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1309-37-1, 1333-86-4	70%	1, 3
730	9904384	COL OR TREND LAMP BL ACK SE	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
847	CF0326Q	COL OR TREND LAMP BL ACK SE	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
730	9904385	COL OR TREND LAMP BL ACK	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
847	CF0326P	COL OR TREND LAMP BL ACK	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
730	9904336	COL OR TREND LAMP BL ACK	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
847	CF01483D	LEAD FREE ORANGE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
730	9904337	LEAD FREE ORANGE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
847	CF0185P	LEAD FREE ORANGE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
730	9904341	AQUACHEM RED IRON OX SE	Aqueous colorant	Time, paints	1309-37-1, 111-76-2, 8032-41-3	60%, 3%, 1%	1, 3
847	CF01486Q	AQUACHEM RED IRON OX SE	Aqueous colorant	Time, paints	1309-37-1, 111-76-2, 8032-41-3	60%, 3%, 1%	1, 3
730	9904365	AQUACHEM LF SHD YELLOW	Aqueous colorant	Time, paints	7645-1	3%	1, 3
847	CF01504Q	AQUACHEM ORG YELL GS SE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
730	9904378	AQUACHEM ORG YELL GS SE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
847	CF01507Q	AQUACHEM PHT GREEN SE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
730	9904379	AQUACHEM PHT GREEN SE	Aqueous colorant	Time, paints	111-76-2	3%	1, 3
847	CF01523P	AQUACHEM LAMP BL ACK	Aqueous colorant	Time, paints	111-76-2, 1333-86-4	3%, 40%	1, 3
730	99014914	B LAMP BL ACK	Aqueous colorant	Time, paints	111-76-2, 1333-86-4	3%, 40%	1, 3
847	CF02088G	LAMP BL ACK 80% 9907	No VOC Aqueous colorant	Time, paints	14807-96-6, 1333-86-4	40%, 10%	1, 3
730	99014946	C YELLOW OXIDE	No VOC Aqueous colorant	Time, paints	14807-96-6, 1333-86-4	40%, 10%	1, 3
847	CF03070A	C YELLOW OXIDE	No VOC Aqueous colorant	Time, paints	107-21-1	10%	1, 3
730	99015060	C YELLOW OXIDE RND B171880	Aqueous colorant	Time, paints	107-21-1	10%	1, 3
730	99015066	COL OR TREND RED OXIDE	Aqueous colorant	Time, paints	14807-96-6	5%	1, 3
730	99015077	LAMP BL ACK RND	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	60%, 20%, 3%	1, 3
847	CF0326G	LAMP BL ACK RND	Aqueous colorant	Time, paints	107-21-1, 14807-96-6, 1333-86-4	60%, 20%, 3%	1, 3
730	99017661	EX TITANIUM WHITE	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1	10%, 5%	1, 3

847	CF00351	K-CITRANILIN WHITE	Aqueous colliant	Time paints		14807-96-6, 1309-37-1	10%, 5%	1,3
730	99017062	V MAGENTA	Aqueous colliant	Time paints		14807-96-6, 1309-37-1	40%, 3%	1,3
847	CF0038L	R ORGANIC RED	Aqueous colliant	Time paints		14807-96-6, 1309-37-1	40%, 3%	1,3
730	99017064	R ORGANIC RED	Aqueous colliant	Time paints		14807-96-6, 1309-37-1	40%, 3%	1,3
847	CF0061L	F RED OXIDE	Aqueous colliant	Time paints		14807-96-6	40%	1,3
730	99012665	F RED OXIDE	Aqueous colliant	Time paints		14807-96-6	40%	1,3
847	CF0064L	F RED OXIDE	Aqueous colliant	Time paints		1309-37-1, 14807-96-6, 1333	60%	1,3
730	99017066	BROWN OXIDE	Aqueous colliant	Time paints		1309-37-1, 14807-96-6, 1333	40%, 20%, 3%	1,3
847	CF0067L	BROWN OXIDE	Aqueous colliant	Time paints		14807-96-6, 1333	40%, 20%, 3%	1,3
730	99017070	L RAW UMBER	Aqueous colliant	Time paints		86-4	40%, 20%, 3%	1,3
847	CF0037L	L RAW UMBER	Aqueous colliant	Time paints		14807-96-6, 1309-37-1, 1333	40%, 20%, 3%	1,3
730	99017071	T RED YELLOW	Aqueous colliant	Time paints		86-4	40%, 10%, 1%	1,3
847	CF0076L	T RED YELLOW	Aqueous colliant	Time paints		14807-96-6	10%	1,3
730	99017072	XXX ORGANIC YELLOW	Aqueous colliant	Time paints		14807-96-6	40%	1,3
847	CF0079L	XXX ORGANIC YELLOW	Aqueous colliant	Time paints		14807-96-6	40%	1,3
730	99017073	D PHTHALO GREEN	Aqueous colliant	Time paints		14807-96-6	40%	1,3
847	CF0083L	E PHTHALO GREEN	No VOC Aqueous colliant	Time paints		14807-96-6, 1328-53-6	40%, 10%	1,3
730	99017074	E PHTHALO GREEN	Aqueous colliant	Time paints		14807-96-6, 1328-53-6	40%, 10%	1,3
847	CF0085L	E PHTHALO BLUE	Aqueous colliant	Time paints		14807-96-6, 1328-53-6	40%	1,3
730	99018474	YELLOW OXIDE R12180	Aqueous colliant	Time paints		14807-96-6, 107-21-1	40%	1,3
847	CF0115L	LAMP BLACK 808-9937	Additive	Time paints		14807-96-6, 1333-86-4	5%, 1%	1,3
847	RTV920D	VARSEL W-20	Additive	Ceramics		13931-17-0	40%, 10%	1,3
847	BU10A0	LAPONITE RDS	Rheological additive for water-borne systems	Surface coatings, household products, general industrial		7722-88-5	8%	1
847	CAT1890	RED P-60 NR	Inorganic pigment	Maintenance paints, coatings, stains		12001-26-2	10%	1
847	CAT196	RED P-61	Inorganic pigment	Architectural paints, industrial coatings, product finishes		1309-37-1	10%	1
847	CF0109L	PHTHALO BL UE 808-7055	Aqueous colliant	Time paints		14807-96-6	20%	1
847	CA7256	RED RA17	Inorganic pigment	Time paints		1309-37-1	10%	1
847	CAT171	RED RA17A	Red iron oxide pigment	Architectural paints, industrial coatings, product finishes		1309-37-1	10%, 90%	1
847	CA7016	RED RA17DA	Red iron oxide pigment	Architectural paints, industrial coatings, product finishes		7631-86-9, 1309-37-1	10%, 90%	1
847	CF0023L	RAW UMBER (808-5069)	Aqueous colliant	Time paints		14807-96-6, 1309-37-1	40%, 10%	1,3
847	CF0081	LAMP BLACK 808-9907	No VOC Aqueous colliant	Time paints		14807-96-6, 1333-86-4	40%, 10%	1,3
847	CLARISTATXCS6031C							
837	1	ARISTOFL EX TAC	Thickener	Personal care (shampoo, shower gel, facial cleanser)		75-65-0	5%	1
730	9909357	LEAD FREE ORANGE	Aqueous colliant	Time paints		111-76-2	3%	1,3
730	9900454	RED IRON OXIDE (86161001)	Aqueous colliant	Time paints		1309-37-1, 111-76-2	60%, 3%	1,3
847	CF0148D	RED IRON OXIDE (86161001)	Aqueous colliant	Time paints		1309-37-1, 111-76-2	60%, 3%	1,3
830	MCOUPR40050PB0GN	MANGNESTUM OXIDE POWDER	Supplement	Medical uses such as supplement, antacid, or laxative		1309-48-4	100%	2
830	FRICC P40020K0NGN	SILICON DIOXIDE	Food grade additive	Anticaking and anti-humectant agent		7631-86-9	98%	2
847	GH001	ZINC OXIDE	Additive	Medical uses such as topical treatment of skin irritations minor burns		1314-13-2	100%	2
730	99018354	VOI ET (8088994)	Aqueous colliant	Time paints		14807-96-6	40%	1,3
847	CF0113L	VOI ET (8088994)	Aqueous colliant	Time paints		14807-96-6	40%	1,3
803	50222910	COMPERI AN XD	Thickener in surfactant preparations	Shampoos, liquid soap, baby care cleaning products		111-43-2	7%	3
730	5024847	QUINACRYDINE VOI ET	Pigment preparation	Time paints		14807-96-6, 1316-71-3	10%, 1%	1,3
730	99001382	PHTHALO GREEN 830-5115	Pigment preparation	Time paints		14807-96-6, 107-21-1	10%, 1%	1,3
847	CF0037B	PHTHALO GREEN 830-5115	Aqueous colliant	Time paints		107-21-1, 14807-96-6	40%, 40%	1,3
730	5024844	HIGH HIDE RED	Pigment preparation	Time paints		14807-96-6, 107-21-1	40%, 40%	1,3
730	99003379	L GREEN 830-4333	Pigment preparation	Time paints		14807-96-6, 107-21-1	10%, 1%	1,3
847	CF0094D	L GREEN 830-4333	Aqueous colliant	Time paints		107-21-1, 14807-96-6	40%, 40%	1,3
730	50248463	RL PERMANENT RED	Pigment preparation	Time paints		107-21-1, 14807-96-6	40%, 40%	1,3
730	99003362	EXT M YELLOW 830-2024	Aqueous colliant	Time paints		14807-96-6, 107-21-1, 12673	40%	1,3
847	CF0025B	EXT M YELLOW 830-2024	Aqueous colliant	Time paints		14807-96-6, 107-21-1, 12673	40%, 20%, 3%	1,3
730	5024887	RL PERMANENT RED	Pigment preparation	Time paints		14807-96-6	40%, 20%, 3%	1,3
730	50248429	RAW UMBER VOC TL	Pigment preparation	Time paints		1309-37-1, 1333-86-4	15%, 1%	1,3
730	50305234	RAW UMBER VOC TL	Pigment preparation	Time paints		1309-37-1, 1333-86-4	15%, 1%	1,3
730	50248635	RAW UMBER VOC TL	Pigment preparation	Time paints		1309-37-1, 1333-86-4	15%, 1%	1,3
730	99003362	RAW UMBER 830-2029	Aqueous colliant	Time paints		1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 10%	1,3
847	CF0022B	RAW UMBER 830-2029	Aqueous colliant	Time paints		1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 10%	1,3
730	99003358	RAW SIENNA 830-4834	Aqueous colliant	Time paints		56-6, 1333-86-4	3%	1,3
847	CF0022B	RAW SIENNA 830-4834	Aqueous colliant	Time paints		14807-96-6, 1309-37-1	10%, 3%	1,3

847	CF0002B	RAW SIERRA 830-1831	Aqueous coluran	Tints, paints	Used in waterborne coatings such as varnishes and wood coatings.	14807-96-6, 1309-37-1	10%, 3%	1,3
706	5090678	LAMP BLACK VOC BL	Pigment preparation	Tints, paints	Flavor and fragrance ingredient	14807-96-6, 1333-86-4, 1310-71-2	15%, 10%, 1%	1,3
776	5090913	LAMP BLACK VOC BL	Pigment preparation	Tints, paints	Medical, personal care, used for minor skin irritations	14807-96-6, 1333-86-4, 1310-71-2	15%, 10%, 1%	1,3
776	50247965	LAMP BLACK VOC BL	Pigment preparation	Tints, paints	Vitamin, food additive	14807-96-6, 1333-86-4, 1310-71-2	15%, 10%, 1%	1,3
730	99000334	BURBT LAMBER 830-1313	Aqueous coluran	Tints, paints	Construction and industrial adhesives	1309-37-1, 107-21-1, 1333-86-4	40%, 20%, 3%	1,3
847	CF0018B	BURBT LAMBER 830-1313	Aqueous coluran	Tints, paints	Stabilizer/dispersing agent for pigments and fillers	1309-37-1, 107-21-1, 1333-86-4	40%, 20%, 3%	1,3
720	99000330	BURBT SIERRA 830-1109	Aqueous coluran	Tints, paints	Used in waterborne coatings such as varnishes and wood coatings.	1309-37-1, 107-21-1, 1333-86-4	40%, 20%, 3%	1,3
847	CF0018B	BURBT SIERRA 830-1109	Aqueous coluran	Tints, paints	Latent hardener for epoxy resin systems used in adhesive, composite, electrical and powder coating industry	1309-37-1, 107-21-1, 1333-86-4	40%, 20%, 3%	1,3
730	99000346	PERM ORANGE 830-0972	Aqueous coluran	Tints, paints	Curing agent for thermosetting epoxy resin compositions in the adhesives and composite industry	14807-96-6, 107-21-1	40%, 20%	1,3
847	CF0007E	PERM ORANGE 830-0972	Aqueous coluran	Tints, paints	Curing agent for thermosetting epoxy resin compositions in the adhesives and composite industry	14807-96-6, 107-21-1	40%, 40%	1,3
730	99000343	BULL RED 830-0802	Aqueous coluran	Tints, paints	Stabilizer/dispersing agent for pigments and fillers	14807-96-6, 107-21-1	40%, 40%	1,3
847	CF0004H	BULL RED 830-0802	Aqueous coluran	Tints, paints	Stabilizer/dispersing agent for pigments and fillers	14807-96-6, 107-21-1	40%, 40%	1,3
865	SONETVA102	SODIUM METABISULFITE	Food grade additive	Tints, paints	Reducing agent, whitening agent	14807-96-6, 107-21-1	90%	3
814	HG	HEXYLENE GLYCOL	Solvent	Surfactant or emulsifying agent in barquers, varnishes, printing inks and paints	Used in waterborne coatings such as varnishes and wood coatings.	107-41-5	99%	1
832	23102X	ZIRCONIUM HARDENER	Zirconium grain refiner	Grain refining and improved castability/casting integrity of alloys	Used in waterborne coatings such as varnishes and wood coatings.	7439-95-4, 7440-67-7	15%, 25%	4
832	1307110331AA	DERVYI ACETATE	Food additive	Flavor and fragrance ingredient	Used in waterborne coatings such as varnishes and wood coatings.	140-11-4	100%	3
839	50904716	CALAMINE USP POWDER	Antirag and skin protection	Medical, personal care, used for minor skin irritations	Used in waterborne coatings such as varnishes and wood coatings.	1314-13-2	100%	3
816	UP9801-B	VITAMIN 3 500 FG	Food additive	Vitamin, food additive	Used in waterborne coatings such as varnishes and wood coatings.	7631-86-9	100%	3
816	UP9801-B	AGITAN P 301	Antifoam agent/Defoamer	Construction and industrial adhesives	Used in waterborne coatings such as varnishes and wood coatings.	7631-86-9	60%	1,2
816	M5316-D	EDAMLAN 516	Dispersing agent	Stabilizer/dispersing agent for pigments and fillers	Used in waterborne coatings such as varnishes and wood coatings.	1305-62-0	10%	1
816	M5316-T	EDAM AN 516	Dispersing agent	Stabilizer/dispersing agent for pigments and fillers	Used in waterborne coatings such as varnishes and wood coatings.	1305-62-0	10%	1
816	UP9833-B	AGITAN P 333	Antifoam agent/Defoamer	Construction and industrial adhesives	Used in waterborne coatings such as varnishes and wood coatings.	7631-86-9	60%	1
721	15	DYHARD 1095	Raw material for industrial manufacturing	Latent hardener for epoxy resin systems used in adhesive, composite, electrical and powder coating industry	Used in waterborne coatings such as varnishes and wood coatings.	1631-86-9	5%	1
731	140001346	DYHARD 100M	Raw material for industrial manufacturing	Curing agent for epoxy resin systems used in adhesive, composite, electrical and powder coating industry	Used in waterborne coatings such as varnishes and wood coatings.	1631-86-9	5%	1
839	50906302	LUTAVIT A 1000	Food additive	Curing agent for thermosetting epoxy resin compositions in the adhesives and composite industry	Used in waterborne coatings such as varnishes and wood coatings.	7631-86-9	13%, 3%	3
731	140001357	DYHARD 50EP	Raw material for industrial manufacturing	Curing agent for thermosetting epoxy resin compositions in the adhesives and composite industry	Used in waterborne coatings such as varnishes and wood coatings.	128-37-0, 7598-79-4	5%	1,2
730	990004350	RR-5311 PHTHALO GREEN D	Aqueous coluran	Tints, paints	Used in waterborne coatings such as varnishes and wood coatings.	7631-86-9	5%	1,2
847	CF00140	RR-5311 PHTHALO GREEN D	Aqueous coluran	Tints, paints	Used in waterborne coatings such as varnishes and wood coatings.	107-21-1, 14807-96-6	40%, 40%	1,3
789	0433801	ALTAOX MBTS	Accelerator for rubber	Tints, paints	Used in tires, hoses, rubber mats, mats	136-78-5, 8042-47-5	92%, 4%	2
789	2003501	DURAX (GHS) POWDER	Accelerator for rubber	Rubber accelerator commonly used in metal, lab and building industries	Used in tires, hoses, rubber mats, mats	95-53-0	99%	2
789	4090501	ETHYL TUNDS TEST P	Accelerator/vulcanizer for rubber	Cure modifier for resins	Used in tires, hoses, rubber mats, mats	1433-55-1, 8042-47-5	92%, 2%	2
789	7511401	ETHYL ZINATE DUSTLESS	Accelerator for rubber	Stabilizer in thermoplastic rubbers and hot melts	Used in tires, hoses, rubber mats, mats	137-26-8, 8042-47-5	92%, 3%	2
789	4183901	METHYL TUNDS TMTD	Accelerator for rubber	Accelerator and vulcanizer for NR and synthetic rubbers	Used in tires, hoses, rubber mats, mats	97-74-5	92%	2
730	99000247	B241302 BURBT LAMBER FT	Non-aqueous coluran	Tints, paints	Used in waterborne coatings such as varnishes and wood coatings.	1332-37-2, 8052-41-3, 12713-03-0, 1309-34-1, 14807-96-6	30%, 30%, 10%, 10%	1,3
847	CF01030	B241302 BURBT LAMBER FT	Non-aqueous coluran	Tints, paints	Used in waterborne coatings such as varnishes and wood coatings.	1332-37-2, 8052-41-3, 12713-03-0, 1309-34-1, 14807-96-6	30%, 30%, 10%, 10%	1,3
836	CFIC653066C	CHIGUARD 5330	UV Absorber for polymers	UV light absorber for automobile and industrial coatings	Used in waterborne coatings such as varnishes and wood coatings.	104810-48-2, 104810-47-1	53%, 43%	1,2
810	1097017	CAMPIC ACID 99%	Food grade additive	Lubricant, binder, deforming coating used on fresh fruits and manufacturing of other food grade additives	Used in waterborne coatings such as varnishes and wood coatings.			
814	DB	DIETHYLENE GLYCOL MONOETHYL ETHER	Solvent	Emulsifier, binder, deforming coating used on fresh fruits and manufacturing of other food grade additives	Used in waterborne coatings such as varnishes and wood coatings.			
857	11-1031-50	PERMETHYL 101A	Emulsifier	Emulsifier and stabilizer used in personal care, cosmetics	Used in waterborne coatings such as varnishes and wood coatings.			
857	NOBETARHEC350DR	PERMETHYL 101A	Emulsifier	Emulsifier and stabilizer used in personal care, cosmetics	Used in waterborne coatings such as varnishes and wood coatings.			
803	50283393	CABABY 450 DCL (Pharven 450 DCL)	Non-aqueous surfactant	Used in shower and bath preparations, hand soaps, shampoos, toothpastes and cleaning waxes	Used in waterborne coatings such as varnishes and wood coatings.			
865	ZTS18EG251	ZINC SULPHATE MONOHYDRATE PWD35	Laboratory chemical	Used as perfume fixative, insect resistant substance	Used in waterborne coatings such as varnishes and wood coatings.			
810	1069545	PHENOXYPHENANOL PRESERVE	Personal Care preservative	Consumer products such as packaging films, cosmetic formulation, toiletries and medical treatment tubing	Used in waterborne coatings such as varnishes and wood coatings.			
823	1304993599AA	DIETHYL PHTHALATE	Plasticizer	Personal care (antiperspirant, deodorant)	Used in waterborne coatings such as varnishes and wood coatings.			
839	ACUDIC60035DBRN	ALUMINUM CITRATE TRIHYDRATE	Chemical/Technical application	Food preservative, natural flavor enhancer, antioxidant (canned fruits, vegetables, jams, jellies)	Used in waterborne coatings such as varnishes and wood coatings.			
808	CAA	CITRIC ACID ANHYDROUS	Food and pharmaceutical additive	Food preservative, natural flavor enhancer, antioxidant (canned fruits, vegetables, jams, jellies)	Used in waterborne coatings such as varnishes and wood coatings.			
810	1001346	Alcohol, 1689 cetyl alcohol	Opacifier in shampoos, emollient, emulsifier or thickening agent in skin creams & lotions, metal	Used in waterborne coatings such as varnishes and wood coatings.	Used in waterborne coatings such as varnishes and wood coatings.			
810	1092114	12 Hydroal stearic acid tid flakes	Thickener for lithium grease	Used in waterborne coatings such as varnishes and wood coatings.	Used in waterborne coatings such as varnishes and wood coatings.			

810	1002167	ISOPROPYL PALMITATE NF	Skin Cosmetics, Pharma equipment						
810	1002700	BIOSECUR C 1608	Cosmetics, Personal Care Products						
810	1003839	GLYCERINE USP 99.7% KOSH	NF Excipient						
810	1003840	GLYCERINE USP 99.7% KOSH	NF Excipient						
810	1004268	CASTOR OIL, SD STANDARD	Lubricants, Natural Polyol in urthane applications						coloring agents, preservatives, and fillers - used in medicines coloring agents, preservatives, and fillers - used in medicines
810	1004269	BACK CASTOR OIL	Hair care applications; personal care products						
810	1004266	L AUBRIC ACID 99% FCG FLAKES	Per FDA 21CFR - Coatings on fresh citrus fruit, fatty acids, in foods as a lubricant, binder, & defoaming agents & as a component in manufacturing of other "Food Grade" additives, surface lubricants used in manufacture of metallic articles						
810	1004769	STEARIC ACID 90 NF KOSHER POWDER	Per FDA 21CFR - Coatings on fresh citrus fruit, chewing gum base, fatty acids, defoaming agents, adhesives, reticulous and polymeric coatings; stearic acid						
810	1005219	RC5A 02 60R TALLOW BASED FLAKES 50%	reticulous and polymeric coatings; components of paper and paperboard in contact with aqueous and fatty foods; rubber articles intended for repeated use; surface lubricants used in the manufacture of metallic articles						
810	1005476	METHYL PARABEN NF USP FINE PWD	Antimicrobials - cosmetics and personal care products						
810	1005819	PALMITIC ACID 98 % FCG FLAKES	Per FDA 21CFR - Coating on fresh citrus fruit, fatty acids, in foods as a lubricant, binder, & defoaming agents & as a component in manufacturing of other "food grade" additives, mono- and diesters						
810	1006345	PHEYOXYETHANOL PRESERVE LIO	Personal Care Fragrance						
810	1007017	CAPRIC ACID 99%	Per FDA 21CFR - Coating on fresh citrus fruit, fatty acids, in foods as a lubricant, binder, &						
810	1007943	PALE PRESSED CASTOR STD LIO	Per FDA 21CFR - Coatings on fresh citrus fruit, fatty acids, in foods as a lubricant, binder, & defoaming agents & as a component in manufacturing of other "food grade" additives, Sanitizing Solutions						
810	1008107	SHARONIX EG 14	Cosmetics, Personal Care products						
810	1008110	SHARONIX AM14	Cosmetics, Personal Care products						
810	1008112	SHARONSE PLUS 181	Cosmetics, Personal Care products						
810	1008576	PROPYL PARABEN NF KOSH PWD	Antimicrobials - cosmetics and personal care products						
810	1008582	COCONUT FATTY 74% FGI	Bioactive, Chemical Intermediate, Tanning Agents, Lubricant, Intermediate, Laboratory Chemical						
810	1008700	COCONUT FATTY 93% FGH	Tanning Agents, Lubricant, Intermediate, Bioactive, Chemical Intermediate, Laboratory Chemical						
810	1008701	COCONUT FATTY 93% FGI	Tanning Agent, Lubricant, Intermediate, Laboratory Chemical						
810	1008734	NO. 1 CASTOR OIL STANDARD	Lubricant, Adhesives, Coatings; Urthane applications; FDA cited application						
810	1008736	NO. 1 CASTOR WHIT STD LIQ	Cosmetic						
810	1008737	NO. 1 CASTOR STD LIQ	Cosmetic						

810	1009191	TRIPLE PRESS STEARIC ACID 1 FOR FLK	PERFDA 31(CHR) Castings on fresh citrus fruit, chewing gum Personal Care Products - Emulsifier for Creams and Lotions, and Shaving Cream Formulation.						3
810	1009640	OLEIC ACID FOR LIQ	For the manufacture of metallic articles, substances migrating from cotton and cotton fabrics used in dry food packaging.						3
810	1009700	VERKOH 30	For the manufacture of metallic articles, substances migrating from cotton and cotton fabrics used in dry food packaging.						3
810	1009102	HYDRESINA G2	Non-ionic surfactant.						3
854	3015193322	MEGA 30% POWDER	For the fortification of foods, ingredient/additive for dietary supplement.						3
854	3015280322	MEGA-DHA POWDER	For the fortification of foods, ingredient/additive for dietary supplement.						3
7178	50157969	MS-65R	POLY FILM						1
7178	50157970	MS-67A 1 BBA1	POLY FILM						2
7178	50157982	XIR-55-WA-G2 (1.38M)	POLY FILM						2
7178	50158098	XIR-75-WA-G1 (1.38M)	POLY FILM						2
789	130101	Agente MA Powder 33	Antioxidant for rubber	Wire & Cable Adhesives & Cements, Hot Melt Latex					2
789	2909201	Agente Sialine S 55# Bag	Antioxidant for rubber	Hotels & Beds, Auto & Appliance, Wire & Cable, Footwear, Adhesives & Adhesives & Cements, Hot Melt Latex					2
789	320501	Agente Superflex Spid G	Antioxidant for rubber	Tires, Auto & Appliance, Wire & Cable, Footwear, Adhesives & Adhesives & Cements	68411-46-1	23%			2
789	370502	Agente T30 Powder	Antioxidant for rubber	Wire & Cable	172-39-4	<20%			2
789	370601	Agente T30 Powder	Antioxidant for rubber	Wire & Cable					2
789	370701	Agente T30 Powder	Antioxidant for rubber	Wire & Cable					2
789	413001	Alux MBYS 55 # Bag	Accelerator	Wire & Cable					2
789	1231100	Chlorobutyl Rubber	Rubber Compound	General purpose rubber					2
789	1273101	Cure-Rite 18 Powder	Accelerator	Adhesive, Automotive Application, Pharmaceutical Rubber applications	128-17-0	<1.5%			2
789	1893401	Darvon WAO Extra LP	Rubber additive	Rubber applications such as natural rubber (NR) compounds					2
789	2085001	Duna (CRS) Powder	Accelerator	For industrial use only	1310-73-2	<0.2%			2
789	2910203	Molyvan E420 30BM	Friction Reducer	Non-detonation, primary, delay-action accelerators for NR and synthetic rubbers					2
789	2916901	Molyvan E22 (425 lb drum)	Friction Reducer	Provides oxidation protection to engine oils, industrial oils and greases					2
789	2917102	Molyvan E22 NT	Friction Reducer	Mainly or improve the anti-fouling properties of an engine oil					2
789	2917801	Molyvan E55	Friction Reducer	Used to maintain or improve the anti-fouling properties of an engine oil					2
789	329301	Moflex (50# Bag)	Accelerator	An excellent oil soluble molybdenum ester/amide friction reducer.					2
789	3724101	Salsolab LVG6 Powder	Stabilizer	Antioxidant to prolong the life of plastics					1
789	3797603	Sonapox OP5 3021 FW	Antioxidant	Antioxidant to prolong the life of plastics					1

Explanation #	Reasoning
	<p data-bbox="1339 380 1372 1113"><u>Tints, Paints, Epoxies, Resins, Sealants, and Other Coating Materials</u></p> <p data-bbox="1185 380 1315 1837">By analogy, any tints, paints, epoxies, resins, sealants, and other coating materials are permissible under CMC section 9141.1's storage designations that specifically allow for the storage of: (i) glass, lumber (no boxes or crates), naval stores, plaster, empty barrels, metal (no scrap), machinery, equipment; (ii) warehousing of furniture, household goods, dry goods, clothing, textiles, durable goods, no perishable foods; (iii) clay and clay products; and (iv) petroleum and petroleum products.</p> <p data-bbox="941 380 1161 1837">Next, storage and use of the above materials, whether specifically identified or as a precursor to a specifically identified material, are necessarily included in CMC section 9141.1's manufacturing designations that specifically allow for: (i) perfume, cosmetics, toiletries (except soap); (ii) ink, polish, putty, enamel (except lacquer, synthetic enamel, polyurethane), ethylene glycol; (iii) novelties, buttons, brushes, toys, candles; (iv) ceramics, pottery, statuary; (v) jewelry, watches, clocks, optical goods, musical instruments, electronic instruments, phonographs, phonograph records, radios, television sets, electronic parts, precision metal products, wire, springs, tools, sandpaper, emery cloth, grinding wheels, printer's type; (vi) furniture, bedsprings, boxes, coffins, fences, sash and doors, venetian blinds, window shades; and (vii) automobiles, trailers, boats, aircraft, heavy equipment.</p> <p data-bbox="803 380 917 1837">The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of Products from the Following Materials": (i) textiles, wool, yarn fur, felt, canvas, leather, hair, feathers, paper, cloth; (ii) bone, horn, shells, cellophane, casein (except glue); (iii) wood, cork, fiberglass, clay, glass (no blast furnace), plastic (no pyroxylin); and (iv) rubber.</p> <p data-bbox="592 380 787 1837">The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of the Following Materials" and "Industrial Activities Involving the Following Processes": (i) cloth, textiles, upholstery, felt, canvas; (ii) sewing, weaving and knitting of textiles, dyeing of yarn and fabrics; (iii) photo-finishing, film developing and processing, photograving, lithography, block printing, silk screening, printing, book binding; (iv) furniture redecorating and restoration, antique restoration, cabinet making, wood carving; (v) raw rubber processing; and (vi) starch mixing and bottling, paint spray booth, shellac mixing (no cooking), paint or enamel mixing (except lacquer, synthetic enamel, polyurethane).</p>

**Rubber and Rubber-based Materials**

By analogy, rubber (natural or synthetic) and its precursor materials are permissible under CMC section 9141.1's storage designations that specifically allow for the storage of: (i) glass, lumber (no boxes or crates), naval stores, plaster, empty barrels, metal (no scrap), machinery, equipment; (ii) warehousing of furniture, household goods, dry goods, clothing, textiles, durable goods, no perishable foods; and (iii) petroleum and petroleum products.

Next, storage and use of the above materials, whether specifically identified or as a precursor to a specifically identified material, are necessarily included in CMC section 9141.1's manufacturing designations that specifically allow for: (i) perfume, cosmetics, toiletries (except soap); (ii) ink, polish, putty, enamel (except lacquer, synthetic enamel, polyurethane), ethylene glycol; (iii) novelties, buttons, brushes, toys, candles; (iv) ceramics, pottery, statuary; (v) jewelry, watches, clocks, optical goods, musical instruments, electronic instruments, phonographs, phonograph records, radios, television sets, electronic parts, precision metal products, wire, springs, tools, sandpaper, emery cloth, grinding wheels, printer's type; (vi) electric and gas fixtures, electric appliances, electric motors and generators, batteries (including rebuilding), signs (electric, neon, billboards, etc.); (vii) Clothing, dry goods, draperies, bedding, rugs, upholstery, automobile seat covers, awnings, bags, rope, baskets; (viii) furniture, bedsprings, boxes, coffins, fences, sash and doors, venetian blinds, window shades; and (ix) automobiles, trailers, boats, aircraft, heavy equipment.

The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of Products from the Following Materials": (i) textiles, wool, yarn fur, felt, canvas, leather, hair, feathers, paper, cloth; (ii) bone, horn, shells, cellophane, casein (except glue); (iii) wood, cork, fiberglass, clay, glass (no blast furnace), plastic (no pyroxylin); and (iv) rubber.

The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of the Following Materials" and "Industrial Activities Involving the Following Processes": (i) cloth, textiles, upholstery, felt, canvas; (ii) sewing, weaving and knitting of textiles, dyeing of yarn and fabrics; (iii) photo-finishing, film developing and processing, photoengraving, lithography, block printing, silk screening, printing, book binding; (iv) furniture redecorating and restoration, antique restoration, cabinet making, wood carvings; (v) plastic molding (including hydraulic press); (vi) tire retreading and recapping; and (vii) raw rubber processing.

**Cosmetics, Hygiene, Personal Care, Shampoo, Vitamins, Food Additives, and Animal Feed**

Both explicitly and by analogy, cosmetics, hygiene, personal care, shampoo, vitamins, food additive, and animal feed with their precursor materials are permissible under CMC section 9141.1's storage designations that specifically allow for the storage of: (i) warehousing of furniture, household goods, dry goods, clothing, textiles, durable goods, no perishable foods; (ii) clay and clay products; and (iii) petroleum and petroleum products.

Next, storage and use of the above materials, whether specifically identified or as a precursor to a specifically identified material, are necessarily included in CMC section 9141.1's manufacturing designations that specifically allow for: (i) perfume, cosmetics, toiletries (except soap); (ii) ink, polish, putty, enamel (except lacquer, synthetic enamel, polyurethane), ethylene glycol; (iii) novelties, buttons, brushes, toys, candles; (iv) ceramics, pottery, statuary; (v) jewelry, watches, clocks, optical goods, musical instruments, electronic instruments, phonographs, phonograph records, radios, television sets, electronic parts, precision metal products, wire, springs, tools, sandpaper, emery cloth, grinding wheels, printer's type; (vi) furniture, bedsprings, boxes, coffins, fences, sash and doors, venetian blinds, window shades; and (vii) automobiles, trailers, boats, aircraft, heavy equipment.

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The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of Products from the Following Materials": (i) textiles, wool, yarn fur, felt, canvas, leather, hair, feathers, paper, cloth; (ii) bone, horn, shells, cellophane, casein (except glue); (iii) wood, cork, fiberglass, clay, glass (no blast furnace), plastic (no pyroxylin); and (iv) rubber.

The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of the Following Materials" and "Industrial Activities Involving the Following Processes": (i) dextrin; (ii) cloth, textiles, upholstery, felt, canvas; (iii) sewing, weaving and knitting of textiles, dyeing of yarn and fabrics; (iv) photo-finishing, film developing and processing, photoengraving, lithography, block printing, silk screening, printing, book binding; (v) furniture redecorating and restoration, antique restoration, cabinet making, wood carving; (vi) raw rubber processing; (vi) oil canning and packaging; and (vii) starch mixing and bottling, paint spray booth, shellac mixing (no cooking), paint or enamel mixing (except lacquer, synthetic enamel, polyurethane).

The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Food Manufacturing and Processing": (i) ice, soft drinks, beer, wine, malt products, dairy products, candy, confections, pastries, bread, oleomargarine, sodium glutamate, honey, nuts, and similar food products (no lard, pickles, sauerkraut, or vinegar); (ii) box lunch preparation; (iii) fruits and vegetables — packing, canning, processing or extracting or bottling of juices (must be at least 100 feet from any residential zone, public school, public park, hospital or long-term health care facility); (iv) fish barbecuing or smoking (oven less than 10 cubic feet, no fish cleaning, retail sales only); (v) dressing of poultry or rabbits (must be at least 100 feet away from any residential zone, public school, public park, hospital or long-term health care facility); and (vi) cigars, cigarettes.



**Industrial Materials**

Both explicitly and by analogy, industrial materials like metals, paper, and their precursors are permissible under CMC section 9141.1's storage designations that specifically allow for the storage of: (i) glass, lumber (no boxes or crates), naval stores, plaster, empty barrels, metal (no scrap), machinery, equipment; (ii) warehousing of furniture, household goods, dry goods, clothing, textiles, durable goods, no perishable foods; (iii) petroleum and petroleum products; and (iv) clay and clay products.

Next, storage and use of the above materials, whether specifically identified or as a precursor to a specifically identified material, are necessarily included in CMC section 9141.1's manufacturing designations that specifically allow for: (i) perfume, cosmetics, toiletries (except soap); (ii) ink, polish, putty, enamel (except lacquer, synthetic enamel, polyurethane), ethylene glycol; (iii) novelties, buttons, brushes, toys, candles; (iv) ceramics, pottery, statuary; (v) jewelry, watches, clocks, optical goods, musical instruments, electronic instruments, phonographs, phonograph records, radios, television sets, electronic parts, precision metal products, wire, springs, tools, sandpaper, emery cloth, grinding wheels, printer's type; (vi) furniture, bedsprings, boxes, coffins, fences, sash and doors, venetian blinds, window shades; and (vii) automobiles, trailers, boats, aircraft, heavy equipment.

The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of Products from the Following Materials": (i) aluminum, sheet metal, ornamental iron, steel; (ii) textiles, wool, yarn fur, felt, canvas, leather, hair, leathers, paper, cloth; (iii) bone, horn, shells, cellophane, casein (except glue); (iv) wood, cork, fiberglass, clay, glass (no blast furnace), plastic (no pyroxylin); and (v) rubber.

The same logic also applies to allow the above materials as necessarily included in CMC section 9141.1's designation for "Manufacturing of the Following Materials" and "Industrial Activities Involving the Following Processes: (i) cloth, textiles, upholstery, felt, canvas; (ii) sewing, weaving and knitting of textiles, dyeing of yarn and fabrics; (iii) photo-finishing, film developing and processing, photoengraving, lithography, block printing, silk screening, printing, book binding; (iv) furniture redecorating and restoration, antique restoration, cabinet making, wood carving; (v) raw rubber processing; (vi) metal plating and finishing; (vii) metal engraving, metal fabrication (no snap riveting) metal spinning, tool tempering, welding; (viii) foundry (no brass or bronze) – precision investment casting, die casting; and (ix) grinding, dressing or cutting of stone, granite or marble, sand washing.