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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.

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.

John P. Kinsey
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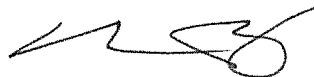
However, this does not mean that Inland Star's warehouse inventory as inspected on December 18-19, 2019, has been confirmed to be in compliance with the CMC or the agreement entered into between the City and Inland Star dated September 5, 2019 ("Agreement"), which go further than merely requiring Inland 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)
Saied Naaseh, Community Development Director (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

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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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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.

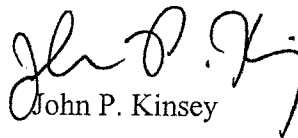
Therefore, to allow the City, Inland Star, and the public an opportunity to meaningfully engage in a public process to articulate clear, generally-applicable standards for industrial uses—and in particular storage and distribution facilities—Inland Star respectfully requests a stay of enforcement pending 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

Cust#	Item#	Description/Name	Uses (See § 1 of SDS)	Analog User/Common Applications (Google, Wikipedia)	CERS Reportable CAS#	% Percentage	CMC Permissibility Reason # (See Explanations, Sheet 2)
7311	140001557	DYHARD D500P	Mfg. of coating materials, adhesives, sealing agents, composite materials	Paints, epoxy adhesives	7631-86-9	5%	1, 3
730	99003159	817103 F RED OXIDE	Aqueous colorant	Tints, paints	1332-37-2, 107-21-1	60%, 20%	1, 3
730	99003171	8171880 C YELLOW OXIDE	Aqueous colorant	Tints, paints	14807-96-6	5%	1, 3
730	99003247	8241302 BURNT UMBER	Non-aqueous colorant	Tints, paints	1309-37-1, 14807-96-6, 8052-41-3, 1333-86-4	13%, 7%, 5%, 2%	1, 3
730	99003339	8300494 PERMA RED	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
847	CF0001B	8300494 PERMA RED	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
730	99003348	8301047 VENETIAN RED	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 1%	1, 3
730	99003375	8302506 INTERIOR YELLOW	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
847	CF0031B	8302506 INTERIOR YELLOW	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
730	99003384	8307216 PHTHALO BLUE	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
847	CF0040B	8307216 PHTHALO BLUE	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
730	99003386	8308895 VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
847	CF0043B	8308895 VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
730	99003388	8309907 LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4, 107-21-1, 14807-96-6	40%, 20%, 20%	1, 3
847	CF0046B	8309907 LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4, 107-21-1, 14807-96-6	40%, 20%, 20%	1, 3
730	99003410	8329901 CARBON BLACK	No VOC Aqueous colorant	Tints, paints	1333-86-4, 7664-41-7	60%, 1%	1, 3
730	99003432	8351234 GP GOLD SE	Aqueous colorant	Tints, paints	1309-37-1, 12001-26-2	3%, 20%	1, 3
730	99003649	8500601 TITANIUM WHITE	Non-aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
730	99003699	8509940 CARBON BLACK M	Non-aqueous colorant	Tints, paints	1333-86-4	30%	1, 3
730	99004013	8770819 AQUASPERSE II T WHIT	Aqueous colorant	Tints, paints	14807-96-6	10%	1, 3
730	99004030	8770787 AQUASPERSE FAST RED	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 64-17-5	30%, 20%, 1%	1, 3
730	99004033	8770880 NAPHTHOL RED	Aqueous colorant	Tints, paints	14807-96-9	5%	1, 3
730	99004045	8771314 BURNT UMBER	Aqueous colorant	Tints, paints	1309-37-1, 14807-96-6, 1333-86-4, 8052-41-3	40%, 10%, 3%	1, 3
847	CF00322P	8771314 BURNT UMBER	Aqueous colorant	Tints, paints	1309-37-1, 14807-96-6, 1333-86-4, 8052-41-3	1%	1, 3
730	99004049	8771403 RAW UMBER	Aqueous colorant	Tints, paints	107-21-1	10%	1, 3
847	CF00323P	8771403 RAW UMBER	Aqueous colorant	Tints, paints	107-21-1	10%	1, 3
730	99004052	8771573 BROWN OXIDE	Aqueous colorant	Tints, paints	14807-96-6	10%	1, 3
730	99004066	8772010 AQUASPERSE II RAW UMBER	Aqueous colorant	Tints, paints	1309-37-1, 1333-86-4, 8052-41-3	40%, 3%, 1%	1, 3
847	CF0040P	8772010 AQUASPERSE II RAW UMBER	Aqueous colorant	Tints, paints	1309-37-1, 1333-86-4, 8052-41-3	40%, 3%, 1%	1, 3
730	99004076	8772501 AQUASPERSE II PERMA YELLOW	Aqueous colorant	Tints, paints	107-21-1, 126-73-8, 14807-96-6	10%, 5%, 1%	1, 3
730	99004108	8777505 ULTRAMARINE BLUE	Aqueous colorant	Tints, paints	14807-96-6	10%	1, 3
847	CF00385P	8777505 ULTRAMARINE BLUE	Aqueous colorant	Tints, paints	14807-96-6	10%	1, 3
730	99004112	8778895 AQUASPERSE II CAR VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
847	CF00388P	8778895 AQUASPERSE II CAR VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-73-8	40%, 40%, 3%	1, 3
730	99004115	8779908 AQUASPERSE II LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4	60%	1, 3
847	CF00391P	8779908 AQUASPERSE II LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4	60%	1, 3
730	99004116	8779908 AQUASPERSE II LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4	60%	1, 3
730	99004120	8779910 HS BLACK	Aqueous colorant	Tints, paints	1333-86-4, 107-21-1	60%, 30%	1, 3
730	99004147	8781046 AQUATREND II RED OX	Aqueous colorant	Tints, paints	14807-96-6	5%	1, 3
730	99004150	8781573 AQUASPERSE II BROWN OX	Aqueous colorant	Tints, paints	1333-86-4, 14807-96-6	5%, 10%	1, 3
826	CLP2168422B	NOVOPERMA RED F5NK	Coloring Agent	Tints, paints	14807-96-6	13%	1, 3
782	050, 33-142-060	MEZX-3040TS	Protection transparency UVA	Cosmetics, Personal Care products	1314-13-2	90%	3
783	12-103-015	SPHERON L1500	Silica micro bead for slip, spreadability	Cosmetics, Personal Care products	7631-86-9		3
782	09-103-020	SERECITE PHN	Pigment extender, bulk filler	Cosmetics, Pharmaceutical preparations	12001-26-2		3
783	12-104-015	SPHERON LC-KAA	SPP booster	Cosmetics, Pharmaceutical preparations	7631-86-9		3
808	SNBS	SODIUM METAFOSULFITE	Food additive	Food uses, disinfectant, preservative	7681-57-4	100%	3
789	4986501	VAHRE AP-2	Polymeric processing aid	Latexes for mold flow and release of rubber products	117-81-7	30%	2
789	0230501	AGERITE SUPERFLEX SOLID G	Antioxidant	Antioxidant for rubber products such as tires	7631-86-9, 122-39-4	25%, 20%	2

826	CLP22164966P	HOSTATINT BLACK A-1100	Colorant preparation	Tints, paints	1333-86-4	125%	1
826	CLP2922044P	HOSTATINT B LAMP BLACK	Coloring Agent	Tints, paints	1331-86-4	100%	1
826	OCRCOR200022B	KONASUL K-200U	Flow agent, filler	Coatings, adhesives sealants, cosmetics	7631-86-9	100%	1, 2, 3
826	SCSSW704055B	SASOL VAX 7040	Anti-forming agent	Industrial use paper	8002-74-2	92%	4
847	BNV140	INVCOR C13365	Corrosion inhibiting pigment	Protective coating systems (anti-rust)	1314-13-2	125%	1
847	RTV520	PYRAX B	Additive/filler	Ceramics, Paints	12001-26-2	125%	1
847	RTV860	VANTALC 6H	Additive/filler	Ceramics, Paints	14807-96-6	98%	1
847	RTV930	VANSIL W-30	Additive	Ceramics	13983-17-0	99%	1
852	221SZE41	ZE41 INEGOT	Industrial lubrication	Casting, welding	7439-95-4	87%	4
839	50691815	DRY VITAMIN A ACETATE	Vitamin	Vitamin	128-37-0	3%	3
865	DIPQME6937	DIPROPYLENE GLYCOL MONOMETHYL ETHER	Solvent	Used in paints, pastes, dyes, resins, brake fluids and inks, and in making cosmetics	34590-94-8	100%	1
816	U1015-57	DEE FO 1015	Anti-forming agent	commonly used for architectural, industrial and wood coatings; as well as printing inks and adhesives.	7631-86-9	3%	1
816	U1015-T	DEE FO 1015	Anti-forming agent	commonly used for architectural, industrial and wood coatings, as well as printing inks and adhesives.	7631-86-9	3%	1
730	99004251	COLORTREND RED OX SE	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CFO481Q	COLORTREND RED OX SE	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99004252	COLORTREND RED OX SE	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99004263	COLORTREND BRN OX SE	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 20%	1, 3
847	CFO484Q	COLORTREND BRN OX SE	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 20%	1, 3
730	99004264	COLORTREND BRN OX	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 20%	1, 3
730	99004276	COLORTREND YELLOW OXIDE	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1309-37-1, 1333-86-4	1%	1, 3
730	99004290	COLORTREND RAW UMBER	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1309-37-1, 1333-86-4	1%	1, 3
847	CFO493L	COLORTREND RAW UMBER	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1309-37-1, 1333-86-4	1%	1, 3
730	99004384	COLORTREND LAMP BLACK SE	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1309-37-1, 1333-86-4	40%, 40%, 10%	1, 3
847	CFO526Q	COLORTREND LAMP BLACK SE	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
730	99004385	COLORTREND LAMP BLACK	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
847	CFO526P	COLORTREND LAMP BLACK	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
730	99004356	AQUACHEM LF ORANGE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
847	CFO148Q	AQUACHEM LF ORANGE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
730	99004357	LEAD FREE ORANGE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
847	CFO148P	LEAD FREE ORANGE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
730	99004541	AQUACHEM RED IRON OX SE	Aqueous colorant	Tints, paints	1309-37-1, 111-76-2, 8052-41-3	60%, 3%, 1%	1, 3
847	CFO148Q	AQUACHEM RED IRON OX SE	Aqueous colorant	Tints, paints	1309-37-1, 111-76-2, 8052-41-3	60%, 3%, 1%	1, 3
730	99004565	AQUACHEM LF MED YELLOW	Aqueous colorant	Tints, paints	78-83-1	3%	1, 3
730	99004569	AQUACHEM ORG YELL GS SE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
847	CFO150Q	AQUACHEM ORG YELL GS SE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
730	99004578	AQUACHEM PHT GREEN SE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
847	CFO150Q	AQUACHEM PHT GREEN SE	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
730	99004579	AQUACHEM PHT GREEN	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
730	99004603	AQUACHEM PHT GREEN	Aqueous colorant	Tints, paints	111-76-2	3%	1, 3
847	CFO152P	AQUACHEM LAMP BLACK	Aqueous colorant	Tints, paints	111-76-2, 1333-86-4	3%, 40%	1, 3
730	99014944	B LAMP BLACK	No VOC Aqueous colorant	Tints, paints	111-76-2, 1333-86-4	3%, 40%	1, 3
847	CFO088G	LAMP BLACK 808-9907	No VOC Aqueous colorant	Tints, paints	14807-96-6, 1333-86-4	40%, 10%	1, 3
730	99014960	C YELLOW OXIDE	No VOC Aqueous colorant	Tints, paints	14807-96-6, 1333-86-4	40%, 10%	1, 3
847	CFO070L	C YELLOW OXIDE	No VOC Aqueous colorant	Tints, paints	107-21-1	10%	1, 3
730	99015060	C YELLOW OXIDE RND 8171880	Aqueous colorant	Tints, paints	107-21-1	10%	1, 3
730	99015066	COLORTREND RED OXIDE	Aqueous colorant	Tints, paints	14807-96-6	5%	1, 3
730	99015077	LAMP BLACK RND	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CFO526G	LAMP BLACK RND	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 1333-86-4	40%, 40%, 10%	1, 3
730	99017061	KX TITANIUM WHITE	Aqueous colorant	Tints, paints	86-4	40%, 40%, 10%	1, 3
					14807-96-6, 1309-37-1	10%, 5%	1, 3

847	CF0035L	KX TITANIUM WHITE	Aqueous colorant	Tints, paints		14807-96-6, 1309-37-1	30%, 5%	1.3
730	99017062	V MAGENTA	Aqueous colorant	Tints, paints		14807-96-6, 1309-37-1	40%, 3%	1.3
847	CF0038L	V MAGENTA	Aqueous colorant	Tints, paints		14807-96-6, 1309-37-1	40%, 3%	1.3
730	99017064	R ORGANIC RED	Aqueous colorant	Tints, paints		14807-96-6, 1309-37-1	40%, 3%	1.3
847	CF0061L	R ORGANIC RED	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
730	99017065	F RED OXIDE	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
847	CF0064L	F RED OXIDE	Aqueous colorant	Tints, paints		1309-37-1	60%	1.3
730	99017066	I BROWN OXIDE	Aqueous colorant	Tints, paints		1309-37-1, 14807-96-6, 1333-86-4	40%, 20%, 3%	1.3
847	CF0067L	I BROWN OXIDE	Aqueous colorant	Tints, paints		1309-37-1, 14807-96-6, 1333-86-4	40%, 20%, 3%	1.3
730	99017070	L RAW UMBER	Aqueous colorant	Tints, paints		14807-96-6, 1309-37-1, 1333-86-4	40%, 10%, 1%	1.3
847	CF00373L	L RAW UMBER	Aqueous colorant	Tints, paints		14807-96-6	10%	1.3
730	99017071	T MED YELLOW	Aqueous colorant	Tints, paints		14807-96-6	10%	1.3
847	CF0076L	T MED YELLOW	Aqueous colorant	Tints, paints		14807-96-6	10%	1.3
730	99017072	AXX ORGANIC YELLOW	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
847	CF0079L	AXX ORGANIC YELLOW	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
730	99017073	D PHTHALO GREEN	No VOC Aqueous colorant	Tints, paints		148807-96-6, 1328-53-6	40%, 10%	1.3
847	CF0082L	D PHTHALO GREEN	No VOC Aqueous colorant	Tints, paints		148807-96-6, 1328-53-6	40%, 10%	1.3
730	99017074	E PHTHALO BLUE	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
847	CF0085L	E PHTHALO BLUE	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
730	99018474	YELLOW OXIDE 8.17.1860	Aqueous colorant	Tints, paints		14807-96-6, 107-21-1	5%, 1%	1.3
847	CF0115L	LAMP BLACK 808-9937	Aqueous colorant	Tints, paints		14807-96-6, 1333-86-4	40%, 10%	1.3
847	RTV920D	VAHSL W-20	Additive	Ceramics		13983-17-0	99%	1
847	BLUM30	LAPONTE RDS	Rheological additive for water-borne systems	Surface coatings, household products, general industrial		7722-88-5	8%	1
847	CATH890	RED P400 NR	Inorganic pigment	Maintenance paints, coatings, stains		12001-26-2	10%	1
847	CAT196	RED RA-14	Inorganic pigment	Architectural paints, industrial coatings, product finishes		1309-37-1	20%	1
847	CF0109L	PHTHALO BLUE 808-7055	Aqueous colorant	Tints, paints		14807-96-6	10%	1
847	CAT226	RED RA17	Inorganic pigment	Coloring agent for powder coatings		1309-37-1	10%	1
847	CAT171	RED RA11A	Red iron oxide pigment	Architectural paints, industrial coatings, product finishes		7631-86-6, 1309-37-1	10%, 90%	1
847	CAT1016	RED RA11YDA	Red iron oxide pigment	Architectural paints, industrial coatings, product finishes		14807-96-6, 1309-37-1	40%, 10%	1.3
847	CF0073L	RAW UMBER (808-2009)	Aqueous colorant	Tints, paints		14807-96-6, 1333-86-4	40%, 10%	1.3
847	CF0088L	LAMP BLACK 808-9907	No VOC Aqueous colorant	Tints, paints		14807-96-6, 1333-86-4	40%, 10%	1.3
857	CLARSTYXACS023C	ABISTOLEX TAC	Thickener	Personal care (shampoos, shower gels, facial cleansers)		75-65-0	5%	3
730	99004337	LEAD FREE ORANGE	Aqueous colorant	Tints, paints		111-76-2	3%	1.3
730	99004341	RED IRON OXIDE (8961.001)	Aqueous colorant	Tints, paints		1309-37-1, 111-76-2	60%, 3%	1.3
847	CF01480Q	RED IRON OXIDE (8961.001)	Aqueous colorant	Tints, paints		1309-37-1, 111-76-2	60%, 3%	1.3
849	MGOUP40050PBGN	MAGNESIUM OXIDE POWDER	Supplement	Medical uses such as supplements, antacid, or laxative		1309-48-4	100%	3
849	PIRCC-P40020KBGN	SILICON DIOXIDE	Food grade additive	Antibacking and anti-humectant agent		7631-86-9	98%	3
847	GHC001	ZINC OXIDE	Additive	Medical uses such as topical treatment of skin irritations minor burns		1314-13-2	100%	3
730	99018354	VIOLET (8088894)	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
847	CF0112L	VIOLET (8088894)	Aqueous colorant	Tints, paints		14807-96-6	40%	1.3
803	50222930	COMPERLAN KD	Thickener in surfactant preparations	Shampoos, liquid soap, baby care cleansing products		111-42-2	7%	3
776	50248647	QUINACRIDONE VIOLET	Pigment preparation	Tints, paints		14807-96-6, 1310-73-2	10%, 1%	1.3
730	99003182	HIGH HIDE RED	Pigment preparation	Tints, paints		14807-96-6, 107-21-1	10%, 1%	1.3
847	CF0037B	PHTHALO GREEN 830-5515	Aqueous colorant	Tints, paints		107-21-1, 14807-96-6	40%, 40%	1.3
776	50248644	PHTHALO GREEN 830-5515	Aqueous colorant	Tints, paints		107-21-1, 14807-96-6	40%, 40%	1.3
730	99003379	HIGH HIDE RED	Pigment preparation	Tints, paints		14807-96-6, 107-21-1	10%, 1%	1.3
847	CF0034B	L GREEN 830-4333	Aqueous colorant	Tints, paints		107-21-1, 14807-96-6	40%, 40%	1.3
776	50248643	L GREEN 830-4333	Aqueous colorant	Tints, paints		107-21-1, 14807-96-6	40%, 40%	1.3
730	99003366	EXT M YELLOW 830-2024	Aqueous colorant	Tints, paints		14807-96-6, 107-21-1, 12673-8	40%, 20%, 3%	1.3
847	CF0025B	EXT M YELLOW 830-2024	Aqueous colorant	Tints, paints		14807-96-6	40%, 20%, 3%	1.3
776	50582887	RL PERMANENT RED	Pigment preparation	Tints, paints		14807-96-6	3%	1.3
776	50763429	RAW UMBER VOC LL	Pigment preparation	Tints, paints		1309-37-1, 1333-86-4	15%, 1%	1.3
776	50302624	RAW UMBER VOC LL	Pigment preparation	Tints, paints		1306-37-1, 1333-86-4	15%, 1%	1.3
776	50248635	RAW UMBER VOC LL	Pigment preparation	Tints, paints		1309-37-1, 1333-86-4	15%, 1%	1.3
730	99003362	RAW UMBER 830-2009	Aqueous colorant	Tints, paints		96-6, 1333-86-4	40%, 20%, 10%	1.3
847	CF0022B	RAW UMBER 830-2009	Aqueous colorant	Tints, paints		1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 10%	1.3
730	99003358	RAW SIENNA 830-1824	Aqueous colorant	Tints, paints		14807-96-6, 1309-37-1	10%, 3%	1.3

847	CF0022B	RAW SIENNA 830-1824	Aqueous colorant	Tints, paints	14807-96-6, 1309-37-1	100%, 3%	1.3
776	50302638	LAMP BLACK VOC BL	Pigment preparation	Tints, paints	14807-96-9, 1333-86-4, 1310-73-2	159%, 100%, 1%	1.3
776	50263215	LAMP BLACK VOC BL	Pigment preparation	Tints, paints	14807-96-9, 1333-86-4, 1310-73-2	159%, 100%, 1%	1.3
776	50247965	LAMP BLACK VOC BL	Pigment preparation	Tints, paints	14807-96-9, 1333-86-4, 1310-73-2	159%, 100%, 1%	1.3
730	99003534	BURNT UMBER 830-1313	Aqueous colorant	Tints, paints	1309-37-1, 1072-21-1, 1333-86-4	409%, 209%, 3%	1.3
847	CF0016B	BURNT UMBER 830-1313	Aqueous colorant	Tints, paints	1309-37-1, 1072-21-1, 1333-86-4	409%, 209%, 3%	1.3
730	99003350	BURNT SIENNA 830-1109	Aqueous colorant	Tints, paints	1309-37-1, 1072-21-1	409%, 20%	1.3
847	CF0013B	BURNT SIENNA 830-1109	Aqueous colorant	Tints, paints	1309-37-1, 1072-21-1	409%, 20%	1.3
730	99003346	PERM ORANGE 830-0979	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	409%, 40%	1.3
847	CF0007B	PERM ORANGE 830-0979	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	409%, 40%	1.3
730	99003343	BULL RED 830-0802	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	409%, 40%	1.3
847	CF0004B	BULL RED 830-0802	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	409%, 40%	1.3
865	SONE1A1708	SODIUM METABISULFITE	Food grade additive	Reducing agent, whitening agent	14807-96-6, 107-21-1	409%, 40%	1.3
814	HG	HEXYLENE GL YCOL	Solvent	Surfactant or emulsifying agent in lacquers, varnishes, printing inks and paints	7681-57-4	99%	3
832	22102X	ZIRMAX HARDENER	Zirconium grain refiner	Grain refining and improved castability/casting integrity of alloys	107-41-5	99%	1
823	1307110035AA	BENZYL ACETATE	Food additive	Flavor and fragrance ingredient	7439-95-4, 7440-67-7	75%, 25%	4
823	1304480047IG	CALAMINE USP POWDER	Antirugent and skin protection	Medical, personal care - used for minor skin irritations	140-11-4	100%	3
839	57311006	VITAMIN 3 500 PG	Food additive	Vitamins, food additives	1314-13-2	100%	3
816	U7P801-B	ACITAN P 801	Antifouling agent/Defoamer	Construction and industrial adhesives	7631-86-9	5%	3
816	M5516-D	EDAP/AN 516	Dispersing agent	Stabilizer/dispersing agent for pigments and fillers	1305-62-0	60%	1.2
816	M5516-T	EDAP/AN 516	Dispersing agent	Stabilizer/dispersing agent for pigments and fillers	1305-62-0	10%	1
816	U7P833-B	ACITAN P 833	Antifouling agent/Defoamer	Used in waterborne coatings such as varnishes and wood coatings	7631-86-9	60%	1
731	15	DYHARD 100S	Raw material for industrial manufacturing	Latent hardener for epoxy resin systems used in adhesive, composite, electrical and powder coating industry	7631-86-9	5%	1
731	140001546	DYHARD 100M	Raw material for industrial manufacturing	Curing agent for thermosetting epoxy resin compositions in the adhesive and composite industry	7631-86-9	5%	1
839	50466305	LUTAVIT A 1000	Feed additive	Animal feed vitamin A additive	128-37-0, 7558-79-4	155%, 3%	3
731	140001557	DYHARD 50EP	Raw material for industrial manufacturing	Curing agent for thermosetting epoxy resin compositions in the adhesive and composite industry	7631-86-9	5%	1.2
730	99004350	888-5511 PHTHALO GREEN D	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1.3
847	CF0514D	888-5511 PHTHALO GREEN D	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1.3
789	0433001	ALTAK MBTS	Accelerator for rubber	Used in tires, hoses, rubber mats, lamps	120-78-5, 8042-47-5	95%, 4%	2
789	2085001	DURAX (CBS) POWDER	Accelerator for rubber	Rubber accelerator commonly used in metal, lab and building industries	95-33-0	99%	2
789	4090501	ETHYL TLADS TEID P	Accelerator/Vulcanizer for rubber	Cure modifier for neoprene	14324-55-1, 8042-47-5	99%, 2%	2
789	7311401	ETHYL ZIMATE DUSTLESS	Accelerator for rubber	Stabilizer in thermoplastic rubbers and hot melts	137-26-8, 8042-47-5	95%, 3%	2
789	4185001	METHYL TLADS TMITD	Accelerator for rubber	Accelerator and vulcanizer for NR and synthetic rubbers	97-74-5	98%	2
789	4376801	VANAX TMITM	Accelerator for rubber	Processing and curing rubbers, neoprenes	1332-37-2, 8052-41-3, 12713-30%	30%, 10%	1.3
730	99003247	8241302 BURNIT UMBER FT	Non-aqueous colorant	Tints, paints	03-0, 1309-34-1, 14807-96-6	10%, 10%	1.3
847	CF01033Q	8241302 BURNIT UMBER FT	Non-aqueous colorant	Tints, paints	03-0, 1309-34-1, 14807-96-6	10%, 10%	1.3
826	CHICG53066P	CHICGUARD 5330	UV absorber for polymers	UV light absorber for automobile and industrial coatings	104810-48-2, 104810-47-1	55%, 45%	1.2
810	1007017	CAPRIC ACID 99%	Food grade additive	Lubricant, binder, degassing coatings used on fresh fruits and manufacturing of other food grade additives			3
814	DB	DIETHYLENE GL YCOL MONOBUUTYL ETHER	Solvent	Cleaners, inks, paints, coatings and lacquers			1
826	11-1031-60	PERMETHYL 101A	Emulsifier	Emulsifier and moisturizer used in personal care, cosmetics			3
837	NOBETANEC450DR	CHEMBETADE C	Surfactant	Used in hand soaps and industrial cleaners			3
803	50283593	CA BABY 450 DCL (Phenox 450 DCL)	Non-ionic surfactant	used in shower and bath preparations, hand soaps, shampoos, toothpastes and cleaning wipes			3
865	ZISULR6251	ZINC SULPHATE MONOHYDRATE PWD35	Laboratory chemical	manufacture substances used for medicinal purpose			3
810	1006545	PHENOXETHANOL PRESERVE	Personal Care preservative	used as perfume fixative, insect repellent, antiseptic			3
823	13044903299AA	DIETHYL PHTHALATE	Plasticizer	consumer products such as packaging films, cosmetic formulations, toiletries and medical treatment tubing			2
849	ACUDIC6003KDRN	ALUMINUM CHLORIDE HEXAHYDRATE	Chemical-technical application	Personal care (antiperspirant, deodorant)			3
808	CAA	CITRIC ACID ANHYDROUS	Food and pharmaceutical additive	Food preservative, natural flavor enhancer, antioxidant (canned fruits, vegetables, jams, jellies)			3
810	1001546	alcohol, 1689 cetyl alcohol	Opacifier in shampoos, emollient, emulsifier or thickening agent in skin creams & lotions, metal				3
810	1003114	12 hydroxyl stearic acid and flakes	Thickener for lithium grease				4

810	1009191	TRIPLE PRESS STEARIC ACID 1 FKG FLK	Per FDA 21CFR: Coatings on fresh citrus fruit, chewing gum, Personal Care Products - Emulsifier for Creams and Lotions, and Shaving Cream Formulations				3
810	1009639	OLEIC ACID FKG LIQ	citrus fruit, fatty acids, chemicals used in washing or to assist in the peeling of fruits and vegetables, defoaming agents, adhesives, resins and polymeric coatings, surface lubricants used in the manufacture of metallic articles, substances migrating from cotton and cotton fabrics used in dry food packaging, substances migrating to food from paper and paperboard products				3
810	1009640	OLEIC ACID FKG LIQ	citrus fruit, fatty acids, chemicals used in washing or to assist in the peeling of fruits and vegetables, defoaming agents, adhesives, resins and polymeric coatings, surface lubricants used in the manufacture of metallic articles, substances migrating from cotton and cotton fabrics used in dry food packaging, substances migrating to food from paper and paperboard products				3
810	1009700	VEROH 20	Non-ionic surfactant				3
810	5000102	HYDRESIA G2	Cosmetic ingredient				3
854	5015193322	MEG-3 30% POWDER	For the fortification of foods, ingredient/additive for dietary supplements				3
854	5015280322	MEG-3 DHA POWDER	For the fortification of foods, ingredient/additive for dietary supplements				3
7178	50157969	MS-6SN	POLY FILM				3
7178	50157970	MS-6S 1/4" 1.88M	POLY FILM				2
7178	50157982	XIR-55-W-A-G2 (1.58M)	POLY FILM				2
7178	50158098	XIR-75-W-A-G2 (1.58M)	POLY FILM				2
789	130301	Agente MA Powder 35	Antioxidant for rubber	Wire & Cable, Adhesives & Cements, Hot Melts, Latex			2
789	290901	Agente Selaie S 55% Bag	Antioxidant for rubber	Hoses & Belts, Auto & Appliance, Wire & Cables, Footwear, Adhesives & Cements, Hot Melts, Latex			2
789	320501	Agente Superflex Solid G	Antioxidant for rubber	Tires, Auto & Appliance, Wire & Cables, Footwear, Adhesives & Cements	68411-46-1	25%	2
789	370502	Agente TMO Powder	Antioxidant for rubber	Wire & Cable	122-39-4	<20%	2
789	370601	Agente TMO Pastilles	Antioxidant for rubber	Wire & Cable			2
789	370701	Agente TMO Ultra Powder	Antioxidant for rubber	Wire & Cable			2
789	435001	Alux MBTS 55 # Bag	Accelerator	General purpose rubber			2
789	1221100	Chlorobutyl Rubber	Rubber Compound	Adhesive, Automotive Application, Pharmaceutical, Rubber applications			2
789	1273501	Cure-Rite 18 Powder	Accelerator	Rubber applications such as natural rubber (NR) compounds.	128-37-0	<15%	2
789	1389501	Durax WAO Extra HP	Rubber additive	For industrial use only.			2
789	2085001	Durax (CBS) Powder	Accelerator	Non-discoloring, primary, delayed-action accelerator for NR and synthetic rubbers.	1310-73-2	<0.5%	2
789	2910502	Molyvan L450 MDN	Friction Reducer	Provides oxidation protection to engine oils, industrial oils and greases.			2,4
789	2916001	Molyvan 822 (425 lb drum)	Friction Reducer	Maintain or improve the antifriction properties of an engine oil			2,4
789	2917102	Molyvan 822 NT	Friction Reducer	Used to maintain or improve the antifriction			2,4
789	2917801	Molyvan 855	Friction Reducer	An excellent oil soluble molybdenum ester/amide friction reducer.			2,4
789	2920301	Morflex (50# Bag)	Accelerator	Accelerators for the Vulcanization of Rubber			2,4
789	3724101	Sabosab UV62 Powder	Stabilizer	Stabilizer for plastics, coatings and other materials			2
789	3797603	Songpox OPS 3021 PW	Antioxidants	Antioxidants to prolong the life of plastics			1

Explanation #	Reasoning
	<p><u>Tints, Paints, Epoxies, Resins, Sealants, and Other Coating Materials</u></p> <p>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>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>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, canvases, 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>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, canvases; (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; 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, baksets; (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 carving; (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**.

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, feathers, 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**.