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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

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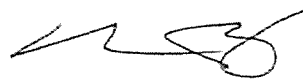
However, this does not mean that Inland Star's warehouse inventory as inspected on December 18-19, 2019, has been confirmed to be in compliance with the CMC or the agreement entered into between the City and Inland Star dated September 5, 2019 ("Agreement"), which go further than merely requiring Inland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

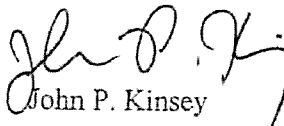
Therefore, to allow the City, Inland Star, and the public an opportunity to meaningfully engage in a public process to articulate clear, generally-applicable standards for industrial uses—and in particular storage and distribution facilities—Inland Star respectfully requests a stay of enforcement pending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

Curat	Item#	Description/Name	Use (See § 1 of SDS)	Antilog Use/Common Applications (Google, Wikipedia)	CENS Reportable CAS#	% Percentage	CMC Feasibility Reason # (See Explanation, Sheet 2)
731	140001557	DYIYARD D-50EP	Mfg. of coating materials, adhesives,	Paints, epoxy adhesives	7631-86-9	5%	1,3
730	99001159	8171035, F RED OXIDE	tealing agents, composite materials		1332-37-2, 107-21-1	60%, 10%	1,3
730	99001171	8171800 C YELLOW OXIDE	Aqueous colorant	Tints, paints	14807-96-6	5%	1,3
730	99001247	8241103 BURNET LAMBER	Non-aqueous colorant	Tints, paints	1309-37-1, 14807-96-6, 8052	13%, 7%, 5%	1,3
730	99001310	8300494 PERMA RED	Aqueous colorant	Tints, paints	41-3, 1333-86-4	2%	1,3
847	CF00018	8300494 PERMA RED	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1,3
730	99003148	831047 VENETIAN RED	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1,3
730	99003175	8302506 INTERIOR YELLOW	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-	60%, 20%, 1%	1,3
847	CF00018	8302506 INTERIOR YELLOW	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%, 3%	1,3
847	CF000184	8307216 PHTHALO BLUE	Aqueous colorant	Tints, paints	73-8	40%, 40%, 3%	1,3
847	CF000408	8307216 PHTHALO BLUE	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1,3
730	99003186	8308895 VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-	40%, 40%, 3%	1,3
847	CF00043B	8308895 VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-	40%, 40%, 3%	1,3
730	99003188	8309907 LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4, 107-21-1, 14807-	40%, 40%, 20%	1,3
847	CF00046B	8309907 LAMP BLACK	Aqueous colorant	Tints, paints	96-6	40%, 40%, 20%	1,3
730	99003410	8315124 CP GOLD SE	His VOC Aqueous colorant	Tints, paints	1333-86-4, 7664-41-7	40%, 40%, 20%	1,3
730	99003452	8300001 TITANIUM WHITE	Aqueous colorant	Tints, paints	1309-37-1, 12001-26-2	60%, 1%	1,3
730	99003459	8309940 CARBON BLACK M	Non-aqueous colorant	Tints, paints	1309-37-1, 12001-26-2	3%, 20%	1,3
730	99004011	8770019 AQUASPERSE II T WHITE	Aqueous colorant	Tints, paints	1333-86-4	30%	1,3
730	99004030	8770871 AQUASPERSE FAST RED	Aqueous colorant	Tints, paints	14807-96-6	10%	1,3
730	99004031	8770871 NAPHTHOL RED	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 64-171-	30%, 10%, 1%	1,3
730	99004045	8771314 BURNET LAMBER	Aqueous colorant	Tints, paints	14807-96-9	5%	1,3
847	CF03122P	8771314 BURNET LAMBER	Aqueous colorant	Tints, paints	1309-37-1, 14807-96-6, 1333	40%, 10%, 3%	1,3
730	99004049	8771403 RAW LAMBER	Aqueous colorant	Tints, paints	86-4, 8052-41-3	1%	1,3
847	CF03123P	8771403 RAW LAMBER	Aqueous colorant	Tints, paints	1309-37-1, 14807-96-6, 1333	40%, 10%, 3%	1,3
730	99004052	8771573 BROWN OXIDE	Aqueous colorant	Tints, paints	107-21-1	10%	1,3
730	99004066	8772010 AQUASPERSE II RAW LAMBER	Aqueous colorant	Tints, paints	14807-96-6	10%	1,3
847	CF03140P	8772010 AQUASPERSE II RAW LAMBER	Aqueous colorant	Tints, paints	1309-37-1, 1333-86-4, 8052-	40%, 3%, 1%	1,3
730	99004076	8772501 AQUASPERSE II PERMA YELLOW	Aqueous colorant	Tints, paints	1309-37-1, 1333-86-4, 8052-	40%, 3%, 1%	1,3
730	99004108	8773503 ULTRAMARINE BLUE	Aqueous colorant	Tints, paints	107-21-1, 126-73-8, 14807-	40%, 3%, 1%	1,3
847	CF03153P	8773503 ULTRAMARINE BLUE	Aqueous colorant	Tints, paints	96-6	10%, 5%, 1%	1,3
730	99004112	8778895 AQUASPERSE II CAR VIOLET	Aqueous colorant	Tints, paints	14807-96-6	10%	1,3
847	CF03184P	8778895 AQUASPERSE II CAR VIOLET	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 126-	10%	1,3
730	99004115	8779008 AQUASPERSE II LAMP BLACK	Aqueous colorant	Tints, paints	73-8	40%, 40%, 3%	1,3
847	CF03191P	8779008 AQUASPERSE II LAMP BLACK	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6, 176-	40%, 40%, 3%	1,3
730	99004116	8779008 AQUASPERSE II LAMP BLACK	Aqueous colorant	Tints, paints	1333-86-4	60%	1,3
730	99004130	8779010 HS BLACK	Aqueous colorant	Tints, paints	1333-86-4	60%	1,3
730	99004147	8781046 AQUASTEND II RED OX	Aqueous colorant	Tints, paints	1333-86-4, 107-21-1	60%, 30%	1,3
730	99004150	8781573 AQUASPERSE II BROWN OX	Aqueous colorant	Tints, paints	14807-96-6	5%	1,3
847	CF03168422B	NOVOPERMA RED FRK	Coloring Agent	Tints, paints	1333-86-4, 14807-96-6	5%, 10%	1,3
782	9250, 33-142-060	MXZ-304015	Protection transparency UVA	Camelids, Personal Care products	14807-96-6	13%	1,3
782	12-101-015	SPHERON L 1500	Silica micro bead for thp, spreadability	Camelids, Personal Care products	1314-13-2	90%	3
782	09-101-020	SPHERIC P10	Pigment extender, bulk filler	Camelids, Personal Care products	7651-86-9		3
782	12-104-015	SPHERON L C-KA	SF booster	Camelids, Pharmaceutical preparations	12001-26-2		3
808	SNBS	SODIUM METABISULFITE	Food additive	Camelids, Pharmaceutical preparations	7651-86-9		3
789	4984591	VARPER AP-2	Polymeric processing aid	Food uses, disinfectant, preservative	7651-86-9	100%	3
789	0320501	AGENTE SUPERL EX SOLID G	Antioxidant	Latexant for mold flow and release of rubber products	117-81-7	30%	2
				Antioxidant for rubber products such as tires	7651-86-9, 122-39-4	25%, 20%	2

836	CLP22164964P	HOSTATINT B, BLACK A,N 100	Colant preparation	Time, paint	1333-86-4	25%	1
836	CLP2992904P	HOSTATINT B, LAMP BLACK	Colant preparation	Time, paint	1333-86-4	10%	1
836	CLP2992904P	KONASU R-2000	Flow agent, filler	Coatings, adhesives, sealants, cosmetics	7631-86-9	100%	1
836	EGSSW 7040759	SASOLWAX 7040	Anti-fanning agent	Industrial use paper	8002-74-2	92%	1, 2, 3
847	BRV140	BYVOCOR CL335	Corrosion inhibiting pigment	Protective coating systems (anti-rust)	1314-13-2	25%	4
847	RTV320	BYVAX B	Adhesive/filler	Ceramics, Paints	12601-28-2	25%	1
847	RTV450	VANALC 64	Adhesive/filler	Ceramics, Paints	14807-96-6	98%	1
847	RTV930	VANSIL W-30	Additive	Ceramics, Paints	13683-17-0	99%	1
837	23132E41	ZE41 ENGOT	Industrial fabrication	Casting, welding	7439-95-4	87%	4
839	50491815	DRY VITAMIN A ACETATE	Vitamin	Vitamin	128-37-0	3%	2
865	DHGM66037	DIPROPYLENE GLYCOL MONOMETHYL ETHER	Solvent	Used in paints, pastes, dyes, resins, brake fluids and ink, and in making cosmetics	34590-94-8	100%	1
816	U1015-57	DEE FO 1015	Anti-fanning agent	commonly used for architectural, industrial and wood coatings, as well as printing inks and adhesives	7631-86-9	3%	1
816	U1015-1	DEE FO 1015	Anti-fanning agent	well as printing inks and adhesives	7631-86-9	3%	1
730	99043231	COLORTREND RED OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF04810	COLORTREND RED OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99043232	COLORTREND RED OXIDE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99043263	COLORTREND BRN OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF04840	COLORTREND BRN OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904364	COLORTREND BRN OX	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904376	COLORTREND YELLOW OXIDE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904290	COLORTREND RAW UNDEER	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0491L	COLORTREND RAW UNDEER	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904384	COLORTREND LAMP BL ACK SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0326Q	COLORTREND LAMP BL ACK SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904385	COLORTREND LAMP BL ACK	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0326P	COLORTREND LAMP BL ACK	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904336	AQUACHEM LT ORANGE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF014830	AQUACHEM LT ORANGE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904337	LEAD FREE ORANGE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0185P	LEAD FREE ORANGE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904341	AQUACHEM RED IRON OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF01486Q	AQUACHEM RED IRON OX SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904365	AQUACHEM LT MED YELLOW	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0150Q	AQUACHEM ORG YELL GS SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904378	AQUACHEM ORG YELL GS SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0150Q	AQUACHEM PHT GREEN SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9904379	AQUACHEM PHT GREEN SE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99044603	AQUACHEM PHT GREEN	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF01323P	AQUACHEM LAMP BL ACK	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9901494	B LAMP BL ACK	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0088G	LAMP BL ACK 808-9907	No VOC Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9901496	C YELLOW OXIDE	No VOC Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0070L	C YELLOW OXIDE	No VOC Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9901500	C YELLOW OXIDE RND B171880	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	9901506	COLORTREND RED OXIDE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99015077	LAMP BL ACK RND	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
847	CF0326G	LAMP BL ACK RND	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3
730	99017061	EX TITANIUM WHITE	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6	60%, 20%, 3%	1, 3

847	CF00351	K2 TITANIUM WHITE	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1	10%, 3%	1, 3
730	99017062	V MAGENTA	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1	40%, 3%	1, 3
847	CF0085L	V MAGENTA	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1	40%, 3%	1, 3
730	99017064	R ORGANIC RED	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1	40%, 3%	1, 3
847	CF0061L	R ORGANIC RED	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
730	99017065	F RED OXIDE	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
847	CF0064L	F RED OXIDE	Aqueous colorant	Time, paints	1309-37-1	40%	1, 3
730	99017066	I BROWN OXIDE	Aqueous colorant	Time, paints	1309-37-1, 14807-96-6, 1333	40%, 20%, 3%	1, 3
847	CF0067L	I BROWN OXIDE	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1, 1333	40%, 20%, 3%	1, 3
730	99017070	L RAW UMBER	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1, 1333	40%, 10%, 1%	1, 3
847	CF0017L	L RAW UMBER	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
730	99017071	T MED YELLOW	Aqueous colorant	Time, paints	14807-96-6	10%	1, 3
847	CF0076L	T MED YELLOW	Aqueous colorant	Time, paints	14807-96-6	10%	1, 3
730	99017072	AXX ORGANIC YELLOW	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
847	CF0079L	AXX ORGANIC YELLOW	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
730	99017073	D PITTALE GREEN	No VOC Aqueous colorant	Time, paints	14807-96-6, 1328-53-6	40%, 10%	1, 3
847	CF0083L	D PITTALE GREEN	No VOC Aqueous colorant	Time, paints	14807-96-6, 1328-53-6	40%, 10%	1, 3
730	99017074	E PITTALE BLUE	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
847	CF0085L	E PITTALE BLUE	Aqueous colorant	Time, paints	14807-96-6, 107-21-1	3%, 1%	1, 3
730	99018474	YELLOW OXIDE 812180	Aqueous colorant	Time, paints	14807-96-6, 1333-86-4	40%, 10%	1, 3
847	CF0115L	LAMP BLACK 808-9937	Additive	Ceramics	13931-17-0	99%	1
847	RTV920D	VARSEL W-20	Rheological additive for water-borne systems	Surface coatings, household products, general industrial	7722-88-5	8%	1
847	BULM010	LAPONITE MDS	Thickener	Maintenance paints, caulking, stains	12001-26-2	10%	1
847	CAT1890	RED PA-14	Inorganic pigment	Architectural paints, industrial coatings, product finishes	1309-37-1	20%	1
847	CAT196	RED PA-14	Inorganic pigment	Architectural paints, industrial coatings, product finishes	14807-96-6	10%	1
847	CF0109L	PHTHALO BL UE 808-7055	Aqueous colorant	Time, paints	1309-37-1	100%, 90%	1, 3
847	CA7236	RED RA17	Iron oxide pigment	Architectural paints, industrial coatings, product finishes	7631-86-9, 1309-37-1	100%, 10%	1, 3
847	CAT171	RED RA17	Iron oxide pigment	Architectural paints, industrial coatings, product finishes	14807-96-6, 1333-86-4	100%, 10%	1, 3
847	CA1016	RED RA17	Iron oxide pigment	Architectural paints, industrial coatings, product finishes	14807-96-6, 1333-86-4	100%, 10%	1, 3
847	CF0073L	RAW UMBER (808-1009)	Aqueous colorant	Time, paints	14807-96-6, 1333-86-4	100%	1, 3
847	CF0081	LAMP BLACK 808-9907	No VOC Aqueous colorant	Time, paints	14807-96-6, 1333-86-4	100%	1, 3
847	CLARSTXTCSS023C	CLARSTXTCSS023C	Thickener	Personal care (shampoo, shower gels, facial cleansers)	75-65-0	3%	1
847	55934537	ARISTO FLEX 1AC	Thickener	Personal care (shampoo, shower gels, facial cleansers)	111-76-2	3%	1, 3
730	99004541	LEAD FREE ORANGE	Aqueous colorant	Time, paints	1309-37-1, 111-76-2	60%, 3%	1, 3
847	CF0148D	RED IRON OXIDE (861601)	Aqueous colorant	Time, paints	1309-37-1, 111-76-2	60%, 3%	1, 3
849	MG001P0050PB00N	MAGNESIUM OXIDE POWDER	Supplement	Medical uses such as supplement, antacid, or laxative	1309-48-4	100%	1, 3
849	PR002P0020N00N	SILICON DIOXIDE	Food grade additive	Anticaking and anti-humectant agent	7631-86-9	98%	1
847	GHC001	ZINC OXIDE	Additive	Medical uses such as topical treatment of skin irritations minor burns	1314-13-2	100%	1
730	99018354	VIOLET (808894)	Aqueous colorant	Time, paints	14807-96-6	40%	1, 3
847	CF0113L	VIOLET (808894)	Aqueous colorant	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%	1, 3
730	5024847	QUINACRYDINE VIOLET	Pigment preparation	Time, paints	14807-96-6, 1310-73-2	10%, 1%	1, 3
730	50263845	HIGH HIDE RED	Pigment preparation	Time, paints	14807-96-6, 107-21-1	10%, 1%	1, 3
730	99001382	PHTHALO GREEN 830-5115	Aqueous colorant	Time, paints	14807-96-6, 107-21-1	40%, 40%	1, 3
847	CF0031B	PHTHALO GREEN 830-5115	Aqueous colorant	Time, paints	14807-96-6, 107-21-1	40%, 40%	1, 3
730	50248644	HIGH HIDE RED	Pigment preparation	Time, paints	14807-96-6, 107-21-1	10%, 1%	1, 3
730	99001379	L GREEN 830-4333	Aqueous colorant	Time, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
847	CF0054D	L GREEN 830-4333	Aqueous colorant	Time, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
730	50248643	RL PERMANENT RED	Pigment preparation	Time, paints	14807-96-6	3%	1, 3
730	99003166	EXT M YELLOW 830-2024	Aqueous colorant	Time, paints	14807-96-6, 107-21-1, 12673	40%, 20%, 3%	1, 3
847	CF0025B	EXT M YELLOW 830-2024	Aqueous colorant	Time, paints	14807-96-6	40%, 20%, 3%	1, 3
730	50282887	RL PERMANENT RED	Pigment preparation	Time, paints	14807-96-6	3%	1, 3
730	50263429	RAW UMBER VOC LL	Pigment preparation	Time, paints	1309-37-1, 1333-86-4	15%, 1%	1, 3
730	50303624	RAW UMBER VOC LL	Pigment preparation	Time, paints	1309-37-1, 1333-86-4	15%, 1%	1, 3
730	50248635	RAW UMBER VOC LL	Pigment preparation	Time, paints	1309-37-1, 1333-86-4	15%, 1%	1, 3
730	99003162	RAW UMBER 830-2009	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 10%	1, 3
847	CF0022B	RAW UMBER 830-2009	Aqueous colorant	Time, paints	1309-37-1, 107-21-1, 14807-96-6, 1333-86-4	40%, 20%, 10%	1, 3
730	99003158	RAW SIENNA 830-1824	Aqueous colorant	Time, paints	14807-96-6, 1309-37-1	10%, 3%	1, 3

847	CE0002B	RAW SIENNA B30-1834	Aqueous colorant	Tints, paints	14807-96-6, 1309-32-1	10%, 3%	1, 3
776	8006628	LAMP BLACK, VOC BL	Pigment preparation	Tints, paints	14807-96-9, 1333-86-4, 1310-73-2	15%, 10%, 1%	1, 3
776	8066215	LAMP BLACK, VOC BL	Pigment preparation	Tints, paints	14807-96-9, 1333-86-4, 1310-73-2	15%, 10%, 1%	1, 3
776	80847965	LAMP BLACK, VOC BL	Pigment preparation	Tints, paints	14807-96-9, 1333-86-4, 1310-73-2	15%, 10%, 1%	1, 3
730	99003334	BURNT UMBER B30-1313	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 1333-86-4	40%, 20%, 3%	1, 3
847	CE0016B	BURNT UMBER B30-1313	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1, 1333-86-4	40%, 20%, 3%	1, 3
730	99003330	BURNT SIENNA B30-109	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1	40%, 20%	1, 3
847	CE0013B	BURNT SIENNA B30-109	Aqueous colorant	Tints, paints	1309-37-1, 107-21-1	40%, 20%	1, 3
730	99003346	PERM ORANGE B30-0979	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	40%, 40%	1, 3
847	CE0007B	PERM ORANGE B30-0979	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	40%, 40%	1, 3
730	99003343	BULL RED B30-0802	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	40%, 40%	1, 3
847	CE0004B	BULL RED B30-0802	Aqueous colorant	Tints, paints	14807-96-6, 107-21-1	40%, 40%	1, 3
865	80861708	SODIUM METABISULFITE	Food grade additive	Reducing agent, whitening agent	7681-57-4	90%	3
814	HG	HEXYLENE GLYCOL	Solvent	Surfactant or emulsifying agent in lacquers, varnishes, printing inks and paints	107-11-5	99%	1
852	32102X	ZIRCONIUM GRAIN REFINER	Zirconium grain refiner	Grain refining and improved suitability/casting integrity of alloys	7439-95-4, 7440-67-7	75%, 25%	4
823	100710051A	BENZYL ACETATE	Food additive	Flavor and fragrance ingredient	140-11-4	100%	1
823	100480947G	CALAMINE USP POWDER	Astringent and skin protection	Medical, personal care - used for minor skin irritations	1314-13-2	100%	3
839	37311006	VITAMIN D 300 FG	Food additive	Vitamins, food additives	7631-86-9	5%	3
816	UTR001-B	ACETAN P 801	Antifungal agent/Detergent	Conservation and industrial adhesive	7631-86-9	60%	3
816	M5316-D	EDAPL AN 516	Dyeing agent	Stabilizer/dispersing agent for pigments and fillers	1305-62-0	10%	1, 2
816	M5316-T	EDAPL AN 516	Dyeing agent	Stabilizer/dispersing agent for pigments and fillers	1305-62-0	10%	1
816	UTR33-B	ACETAN P 833	Antifungal agent/Detergent	Used in washhouse 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	148001546	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	39466305	LUTAVIT A 1080	Feed additive	Animal feed vitamin A additive	128-37-0, 7558-79-4	15%, 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	BB-5311 PHTHALO GREEN D	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
847	CE0140	BB-5311 PHTHALO GREEN D	Aqueous colorant	Tints, paints	107-21-1, 14807-96-6	40%, 40%	1, 3
789	0415001	AL-TAK M87S	Accelerator for rubber	Used in tires, hoses, rubber mats, bags	120-78-5, 8043-47-5	95%, 4%	2
789	0005001	DURAS (CBS) POWDER	Accelerator for rubber	Rubber accelerator commonly used in metal, lab and building industries	95-33-0	99%	2
789	0003001	ETHYL TUDAS TETD P	Accelerator/Vulcanizer for rubber	Cure modifier for neoprene	14334-55-1, 8047-47-5	95%, 2%	2
789	1511401	METINYL ZINATE DUSTLES	Accelerator for rubber	Stabilizer in thermoplastic rubbers and hot melt	93-74-5	95%, 3%	2
789	0185001	METINYL TUDAS TETD	Accelerator for rubber	Accelerator and vulcanizer for NR and synthetic rubbers	93-74-5	95%, 3%	2
789	4576801	VANAX TMTM	Accelerant for rubber	Processing and curing rubbers, neoprenes	1332-37-2, 8032-41-3, 12713-105-6, 1309-34-1, 14807-96-6	10%, 10%, 10%, 10%	2
730	99001247	BURNT UMBER FT	Non aqueous colorant	Tints, paints	1332-37-2, 8032-41-3, 12713-105-6, 1309-34-1, 14807-96-6	10%, 10%, 10%, 10%	1, 3
847	CE010310	BURNT UMBER FT	Non aqueous colorant	Tints, paints	1332-37-2, 8032-41-3, 12713-105-6, 1309-34-1, 14807-96-6	10%, 10%, 10%, 10%	1, 3
846	CE033060P	CHROMALD 5530	UV absorber for polymers	UV light absorber for automobile and industrial coatings	03-0, 1309-34-1, 14807-96-6	10%, 10%, 10%	1, 3
810	1007017	CARIC ACID 99%	Food grade additive	UV light absorber for automobile and industrial coatings	104810-48-2, 104810-47-1	55%, 45%	1, 2
814	DB	DITHYLAENE GLYCOL MONO BUTYL ETHER	Solvent	Levitating, binder, deforming coating used on fresh fruits and manufacturing of other food grade additives			3
782	11101160	PERMAHYT 10A	Emulsifier	Emulsifier, binder			3
857	MOBETADINE-C	CHEMBETADINE C	Surfactant	Used in hand soaps and industrial cleaners			1
800	30283393	CA BABY 450 DCL (Phenacetin 450 DCL)	Non-toxic surfactant	Used in shower and bath preparations, hand soaps, shampoo, toilet paper and cleaning wipes			3
865	CE0514	ZINC SULPHATE MONOHYDRATE PWD33	Laboratory chemical	Emulsifier in shampoo, emollient, emulsifier or thickening agent in skin creams & lotions, metal			3
810	100545	PHENOXYPHENACOL PRESERVE	Personal Care preservative	consumer products such as packaging films, cosmetic formulations, toiletries and medical treatment tubing			3
823	1304809299AA	DIETHYL PHTHALATE	Plastics	Personal care (antiperspirant, deodorant)			3
849	ACUCIDE 60025BDHN	ALUMINUM CHLORIDE HEXAHYDRATE	Chemical/Technical application	Food preservative, natural flavor enhancer, antioxidant (soured fruits, vegetables, jams, jellies)			2
800	CA	CITRIC ACID ANHYDROUS	Chemical/Technical application	Food preservative, natural flavor enhancer, antioxidant (soured fruits, vegetables, jams, jellies)			3
810	1001546	alcohol, 100% cew, alcohol	Opacifier in shampoo, emollient, emulsifier or thickening agent in skin creams & lotions, metal				3
810	1002114	12 hydroxy stearic acid sodium salt	Thickener for lithium grease				4

810	1002167	ISOPROPYL PALMITATE NF	Skin Cosmetics, plasma recipient						
810	1002200	BIOSECUR C 1608	Cosmetics, personal care products						3
810	1003839	GLYCERINE USP 99.7%, KOSH	NF Excipient	coloring agents, preservatives, and fillers; used in medicines					3
810	1003840	GLYCERINE USP 99.7%, KOSH	NF Excipient	coloring agents, preservatives, and fillers; used in medicines					3
810	1004268	CASTOR OIL, SD STANDARD	Lubricants, Natural Polyol in urethane applications						3
810	1004269	BACK CASTOR OIL	Hair care applications; personal care products						2,3
			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						3
810	1004266	L AUBRIC ACID 99% FGG FLAKES	Per FDA 21CFR - Coatings on fresh citrus fruit, chewing gum base, fatty acids, defoaming agents, adhesives, retinous and polymeric coatings, stearic acid						3
810	1004769	STEARIC ACID 50 NF KOSHER POWDER	retinous 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						3
810	1005219	RG5A 02 60R TALLOW BASED FLAKES 50#	Antimicrobial - cosmetics and personal care products						3
810	1005476	METHYL PARABEN NF USP FINE PWD	Antimicrobial - cosmetics and personal care products						3
810	1005819	PALMITIC ACID 98 % FGG 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, mono- and dibasic esters						3
810	1006345	PHENOXYETHANOL, PRESERVE LIQ	Personal Care Preservative						3
810	1007017	CAPRIC ACID 99%	Per FDA 21CFR - Coatings on fresh citrus fruit, fatty acids, in foods as a lubricant, binder, &						3
810	1007943	PALE PRESSED CASTOR STD LIQ	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						3
810	1008107	SHAROMIX EG 14	Cosmetics, Personal Care products						3
810	1008110	SHAROMIX AM14	Cosmetics, Personal Care products						3
810	1008112	SHAROSENSE PLUS 181	Cosmetics, Personal Care products						3
810	1008576	PROPYL PARABEN NF KOSH PWD	Antimicrobial - cosmetics and personal care products						3
810	1008582	COCONUT FATTY 74% FGH	Bioicide, Chemical Intermediate, Tanning Agents, Lubricant, Intermediate, Laboratory Chemical						1,2,3
810	1008700	COCONUT FATTY 93% FGH	Tanning Agents, Lubricant, Intermediate, Bioicide, Chemical Intermediate, Laboratory Chemical						1,2,3
810	1008701	COCONUT FATTY 93% FGH	Tanning Agents, Lubricant, Intermediate, Laboratory Chemical						1,2,3
810	1008734	NO. 1 CASTOR OIL STANDARD	Lubricant, Adhesives, Coatings, Urethane applications; FDA cited application						1,2,3
810	1008736	NO. 1 CASTOR WHIT STD LIQ	Cosmetic						3
810	1008737	NO. 1 CASTOR STD LIQ	Cosmetic						3

810	1009191	TRIUPLE PRESS STEARIC ACID 1 FGR FLK	For FDA 31 CFR Castings on fresh citrus fruit, chewing gum Personal Care Products - Emulsifier for Creams and Lotions, and Shaving Cream Formulation. For FDA 31 CFR Castings on 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.					3
810	1009619	OLEIC ACID FGR LIO	For FDA 31 CFR Castings on 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.					3
810	1009640	OL EIC ACID FGR LIO	For FDA 31 CFR Castings on 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.					3
810	1009700	VEROH 30	Non-ionic surfactant					3
810	10090102	HYDRESIA G2	Coactive Ingredient					3
854	3015193322	MEG-1 30% POWDER	For the fortification of foods, ingredient additive for dietary supplements					3
854	5015280322	MEG-1 DHA POWDER	For the fortification of foods, ingredient additive for dietary supplements					3
7178	50157969	MS-65N	POLY FILM					2
7178	50157970	MS-657A-1 BBA1	POLY FILM					2
7178	50157982	XIR-55-WA-G2 (1.28M)	POLY FILM					2
7178	50158098	XIR-75-WA-G1 (1.58M)	POLY FILM					2
789	130301	Agente MA Powder 35	Antioxidant for rubber	Wire & Cable Adhesives & Cements, Hot Melt, Latex				2
789	206901	Agente Sstahle S 55# Bag	Antioxidant for rubber	Hot & Delta, Auto & Appliance, Wire & Cable, Footwear, Adhesives & Cements, Hot Melt, Latex				2
789	330501	Agente Superflex Solid G	Antioxidant for rubber	Wire & Cable Adhesives & Cements, Hot Melt, Latex				2
789	370502	Agente T860 Powder	Antioxidant for rubber	Wire & Cable Adhesives & Cements, Hot Melt, Latex				2
789	370601	Agente T860 Powder	Antioxidant for rubber	Wire & Cable Adhesives & Cements, Hot Melt, Latex				2
789	370701	Agente T860 Powder	Antioxidant for rubber	Wire & Cable Adhesives & Cements, Hot Melt, Latex				2
789	415001	Altax MBT5 55 # Bag	Accelerator	Wire & Cable Adhesives & Cements, Hot Melt, Latex				2
789	1231100	Chlorobutyl Rubber	Rubber Compound	General purpose rubber applications				2
789	1231301	Cure-Rite 18 Powder	Accelerator	Adhesive, Automotive Application, Pharmaceutical Rubber applications				2
789	1189301	Darun WAO Extr LIP	Rubber additive	Rubber applications such as natural rubber (NR) compounds				2
789	2085001	Duns (CRS) Powder	Accelerator	For industrial use only				2
789	2910502	Molyvan L430 30BM	Friction Reducer	Non-detonating, primary, delayed-action accelerators for NR and synthetic rubbers				2
789	2916001	Molyvan B22 (425 lb drum)	Friction Reducer	Provides oxidation protection to engine oils, industrial oils and greases				2
789	2917102	Molyvan B22 NT	Friction Reducer	Maintain or improve the anti-friction properties of an engine oil				2
789	2917801	Molyvan B35	Friction Reducer	Used to maintain or improve the anti-friction properties of an engine oil				2
789	2920301	Moflex (50# Bag)	Accelerator	An excellent oil soluble molybdenum esteramide friction reducer				2
789	3172101	Sabotab UV66 Powder	Stabilizer	Accelerators for the Vulcanization of Rubber				2
789	31767603	Sonapox OPS 1021 FW	Antioxidant	Stabilizer for plastics, coatings and other materials				2
			Antioxidant	Antioxidants to prolong the life of plastics				2

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, 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>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, photogravure, 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, photengraving, 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; (vii) oil canning and packaging; and (viii) 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, polychrome), 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) 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.