TO: OHIO DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS
DATE: 2011
RE: Information Packet for Corrosion-Resistant Compound (CRC) Campaign B0D

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D
OHIO DEALER INFORMATION PACKET

This bound volume contains two parts of the Ohio Dealer Information Packet for the Tundra Corrosion-Resistant Compound (CRC) Campaign B0D—the Getting Started Guide and the Guide to Federal, State and Local Requirements. The third part—the Technical Instructions—is bound separately.
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Toyota is launching a Corrosion-Resistant Compound (CRC) Campaign for 2000-2003 model year (MY) Tundra vehicles registered in certain cold climate states with high road salt use (“Cold Climate States”). This Campaign consists of two components:

(1) The next phase of Safety Recall 90M announced in November 2009 affecting the rear portion of the frame. Under this next phase, owners of covered vehicles will receive a CRC application to the rear portion of the frame as part of the remedy for the identified condition.

(2) A Customer Satisfaction Program to address the potential for greater than expected levels of corrosion to the front portion of the frame in these vehicles.

For ease of reference only, this Dealer Information Packet will refer to the entire CRC Campaign for the 2000-2003 MY Tundras by the internal designation assigned to this next phase of Safety Recall 90M – “B0D”.

This Dealer Information Packet will help you prepare for and conduct the Tundra B0D by addressing federal, state and local laws that apply to spray application of CRCs. Your dealership should already be familiar with these laws and with the format of this Packet as a result of conducting the Tacoma Limited Service Campaign (LSC) 90D.

For the Tundra B0D, you will also be using the Vaupel HSDR 3300 spray gun to apply two CRCs to the interior and exterior of the frame:

- **Frame Internal Surfaces:** The interior CRC for the Tundra B0D will be the same 712AM material being used for the Tacoma LSC 90D, and you will be using the same Vaupel HSDR 3300 issued to you for LSC 90D.

- **Frame External Surfaces:** The exterior CRC for the Tundra B0D will not be X128T (now being used in Tacoma LSC 90D), but a different material known as “Noxudol 300 S”. You will be issued one additional Vaupel HSDR 3300 to apply the Noxudol 300 S for the Tundra B0D.

As with the Tacoma LSC 90D, the Tundra B0D CRCs contain Volatile Organic Compounds (VOCs), Particulate Matter (PM) and other substances that are subject to federal, state and/or local laws related to **air emissions, fire code approval, waste generation and**
recordkeeping. However, Noxudol 300 S contains lower VOCs than X128T and is a Class IIIB, instead of a Class II, combustible material. As a result, the Tundra B0D will pose different -- and generally less stringent -- compliance obligations under federal, state and/or local laws. Your dealership will be able to comply with these laws without significant burdens on your business as long as you follow the steps discussed in this Packet. Therefore, please review this entire Information Packet with your service and parts staff BEFORE you begin conducting the B0D.

This Packet consists of three parts, contained in two bound booklets:

1. “GETTING STARTED GUIDE”: Gets you started by reviewing the steps your dealership needs to take to comply with federal, state and local laws.

2. “GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS”: Reviews in more detail relevant federal, state and local laws. Also provides compliance tools.

3. “TECHNICAL INSTRUCTIONS”: Contains detailed technical instructions that you should follow at all times.
Confirm LSC 90D Is Being Conducted At Address Listed On Your Air Permit. Toyota Motor Sales, U.S.A., Inc. (TMS) worked with you to obtain a Permit to Install and Operate ("PTIO") from the Ohio Environmental Protection Agency (Ohio EPA) authorizing your dealership to conduct the LSC 90D. This PTIO requires you to conduct the LSC 90D at the specific address listed for your dealership. If you have been conducting the LSC 90D at a different address than the one listed in your PTIO, please stop reading this Packet and call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.

Use Same Spray Space for LSC 90D and B0D: Toyota is advising its dealers to conduct the Tundra B0D in the same spray space now being used to conduct the Tacoma LSC 90D. If you are not able to use the existing Tacoma LSC 90D spray space for the Tundra B0D, then your compliance obligations may be different than what is covered in this Packet. Therefore, in the event you are not able (or believe you might not be able) to use the existing LSC 90D spray space, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 immediately to discuss your particular situation.

Notify Your Local Fire Code Enforcement Official: Your dealership should have applied for and already obtained approval from your local fire code enforcement official to conduct the Tacoma LSC 90D. You will need to notify your local fire code enforcement official that you plan to conduct the Tundra B0D in the same spray space as LSC 90D. This Packet contains information to help you provide such notification.

If you are not able to use the Tacoma LSC 90D spray space for the Tundra B0D, then you will need to identify an appropriate spray space for the Tundra B0D and then you will need to contact your local fire code enforcement official for approval. If you are facing this situation, you also may wish to seek approval from your local fire code enforcement official to re-locate your LSC 90D spray space so that you can use the same space for both campaigns. Before proceeding, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss your particular situation.
Are You Conducting The LSC 90D At the Address Identified In Your Air Permit?  Toyota Motor Sales, U.S.A., Inc. worked with you to obtain a Permit to Install and Operation (“PTIO”) from the Ohio Environmental Protection Agency authorizing your dealership to conduct the LSC 90D. This PTIO requires you to conduct the LSC 90D at the specific address listed for your dealership. If you have been conducting the LSC 90D at a different address than the one listed in your PTIO, please stop reading this Packet and call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.

Where Will You Conduct The B0D?  This Getting Started Guide assumes that you will conduct the Tundra B0D in the same spray space currently being used to conduct the Tacoma LSC 90D. If you are unable to do so, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347), for assistance.

PLEASE READ THIS GETTING STARTED GUIDE CAREFULLY SO THAT YOU UNDERSTAND THE STEPS YOUR DEALERSHIP SHOULD TAKE TO COMPLY WITH THE APPLICABLE LEGAL REQUIREMENTS:

- **BEFORE** beginning the B0D Campaign (see Steps 1, 2, 3 and 4 below); and
- **WHILE** conducting the B0D Campaign (see Steps 5 and 6 below).

**STEP 1 – BEFORE YOU BEGIN APPLYING TUNDRA B0D CRCs, PLEASE CONFIRM THAT YOUR SPRAY SPACE IS APPROPRIATE**

To ensure that the Tundra B0D is conducted in compliance with all applicable regulatory requirements, you need to ensure that the existing CRC spraying space for the Tacoma LSC 90D meets certain minimum requirements, and if so, then notify the appropriate fire code enforcement official that you intend to use this space for the Tundra B0D. Your existing spray space for Tacoma LSC 90D should meet regulatory requirements if it is large enough and has a lift that will accommodate a Tundra. If you cannot use the existing LSC 90D spray space for the Tundra B0D, you will need to establish a new spray space and contact your local fire code enforcement official for approval. If you are facing this situation, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) for assistance.
Go to the Site Selection Section for more information.

STEP 2 – BEFORE APPLYING THE TUNDRA B0D CRCs, CONFIRM THAT YOUR DEALERSHIP RECEIVED AN AIR PERMIT FROM THE OHIO EPA FOR THE TACOMA LSC 90D AND THAT YOU CAN CONDUCT THE B0D CONSISTENT WITH THIS PERMIT

The B0D CRC materials contain Volatile Organic Compounds (VOCs), Particulate Matter (PM) and other substances subject to federal and state air quality laws. Generally, these laws allow emissions up to a certain level and require a facility, if it wishes to exceed that level, to obtain an air permit from the state.

We assume that your dealership is currently exempt from federal “major source” air permitting. Your dealership will be exempt from this federal air permitting if its potential to emit (PTE) for VOCs is less than 100 tons per year (tpy) and 100 tpy for PM. You should be able to add the B0D to your current operations (including the Tacoma LSC 90D ongoing until the end of 2011) and stay well below these permitting thresholds, unless your dealership currently operates a very large body shop or otherwise engages in substantial painting, spraying or other activities that use spray guns.

Do I Have To Consider My Entire Dealership’s Operations Or Only Operations At The Place Where I Will Conduct The Tundra B0D and LSC 90D?  The federal “major source” air permitting thresholds identified above must be applied to YOUR ENTIRE DEALERSHIP and NOT just to the building with the spray space where you will conduct the Tundra B0D (and have been conducting the Tacoma LSC 90D).  For example, if your dealership’s physical plant is distributed across multiple buildings, land parcels or physical locations, all of those buildings and locations would be subject to the requirements above. These thresholds also may apply to an offsite location, such as a very large body shop that your dealership operates at a separate location.

If your dealership operates a very large onsite or offsite body shop or otherwise engages in substantial painting, spraying or other activities that use spray guns, please stop reading this package and call the EH&S Hotline (877-572-4347), for more information and instructions.

As for state “minor source” air permitting, Toyota Motor Sales, U.S.A., Inc. (TMS) worked with you to obtain a Permit To Install and Operate (“PTIO”) from the Ohio Environmental Protection Agency (Ohio EPA) authorizing your dealership to conduct the LSC 90D.  TMS has contacted the Ohio EPA and explained the B0D and its air emissions.  Ohio EPA has indicated that this PTIO also authorizes Toyota dealers to conduct the B0D as long as each dealership complies with the permit and conducts the B0D in a manner that assures emissions consistent with the levels presented by TMS to Ohio EPA.
THE PTIO ISSUED TO YOU FOR THE LSC 90D AUTHORIZES YOU TO CONDUCT THE B0D AS LONG AS YOUR DEALERSHIP SATISFIES THE FOLLOWING CRITERIA:

1. **Conduct the B0D at the address listed on the PTIO.**
   a. Your PTIO lists a specific address for your dealership.
   b. You should already be conducting the LSC 90D at this specific address.
   c. You must conduct the B0D at this same address; if you intend to conduct it elsewhere, then you will need a new permit.

2. **Apply the CRCs in accordance with the technical instructions and do so only in the spray space already approved by your local fire code enforcement official for LSC 90D.**
   a. You may conduct vehicle preparation work in another service bay.
   b. But, do NOT apply the CRCs in any service bay other than the one the one already approved as a spray space for LSC 90D.

REMEMBER: The Technical Instructions for the B0D require you to:

(1) Apply only the “Noxudol 300 S” and “712AM” CRCs in specified quantities – no more than three liters (0.793 gallon) of Noxudol 300 S and one liter (0.528 gallon) of 712AM per Tundra truck; and

(2) Use only the Vaupel HSDR 3300 spray gun equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand to apply these CRCs; and

(3) Maintain the Vaupel HSDR 3300 spray gun in good working order, but **DO NOT clean the gun**. If you have any problems with your spray guns, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information.

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At the present time, Ohio dealers will conduct B0D in only one spray space and it will be the same spray space now being used for LSC 90D. In the future, after conclusion of the LSC 90D on December 31, 2011, TMS may decide to offer a CRC program for other Toyota vehicles. In such event, your dealership may be given the option of establishing and obtaining approval from your local fire code enforcement official for a second spray space. If so, this second spray space also would be covered by the PTIO issued for the LSC 90D as long as (1) it is located at the address listed on the PTIO; (2) you do not process more than 1 Tundra every 2 hours in that space; and (3) you adhere to any processing limits that might be required to comply with the PTIO for any other Toyota vehicles being offered a CRC program.
3. **Assure the VOC and PM emissions that occur when you are applying the CRCs are consistent with the emissions levels presented by TMS to Ohio EPA by NOT processing more than one Tundra every 2 hours or more than one Tacoma every 1 hour.**

a. “Processing” means the application of CRCs with the Vaupel HSDR 3300; it does not include vehicle preparation activities.

b. The vehicle processing limits mean that once you begin processing a vehicle, you may not begin processing another vehicle until the 2 hours (in the case of a Tundra) or the 1 hour (in the case of a Tacoma) has passed.

c. **Example #1:** You begin processing (i.e., applying the CRCs to) a Tundra at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a second Tundra for processing. You complete processing the first Tundra at 11:30 a.m., and by that time, you also have completed your preparation of the second Tundra for processing. You may move that second Tundra to the spray space at 11:30 a.m., but you may **NOT** begin processing it until 12:00 p.m. – i.e., until 2 hours after you began processing the first Tundra at 10 a.m.

d. **Example #2:** You begin processing (i.e., applying the CRCs to) a Tacoma at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a Tundra for processing. You complete processing the Tacoma at 11:05 a.m., and by that time, you also have completed your preparation of the Tundra for processing. You may move that Tundra to the spray space and begin processing it immediately, given that more than 1 hour has passed since you began processing the Tacoma – i.e., you began processing at 10:00 a.m. and finished at 11:05 a.m.
4. **ADHERE TO THE CONDITION IN THE PTIO THAT YOUR DEALERSHIP MUST NOT PROCESS MORE THAN A TOTAL OF 1,398 VEHICLES PER YEAR.** **NOTE:** THIS CONDITION APPLIES TO THE LSC 90D AND B0D COMBINED.

5. **COMPLY WITH ALL TRAINING, HOUSEKEEPING, RECORDKEEPING AND REPORTING REQUIREMENTS SPECIFIED IN THE PTIO AND/OR IN OHIO EPA REGULATIONS AS FOLLOWS:**

   a. Keep records that document vehicle processing and emissions of VOCs and PM from LSC 90D and B0D; retain those records for a period of 5 years after you apply CRCs to the last Tundra under the B0D.

   b. Store the CRCs when not in use, as well as the waste generated from the LSC 90D and B0D, in closed, non-absorbent, non-leaking containers.

   c. Train all staff at your dealership that will be conducting the B0D in the proper use, handling, and storage of the CRCs.

   d. Complete and submit the Annual Permit Evaluation Report, using the forms and following the instructions that will be mailed to you by Ohio EPA.

**IMPORTANT:** ADDITIONAL REQUIREMENTS APPLY TO DEALERSHIPS LOCATED IN BUTLER, CLARK, CLERMONT, GREENE, HAMILTON, MIAMI, MONTGOMERY, OR WARREN COUNTY (“NONATTAINMENT COUNTIES”).
If your dealership is located in one of these counties, then you must also submit an Automobile Refinishing Operations Notification to the Ohio EPA district office for your county before you begin the B0D. (You do not need to receive a response to this notification and may start the B0D after it is submitted.) See the Nonattainment Counties Section of the Guide to Federal, State and Local Requirements for instructions.

How Can I Learn More? Please see the Air Regulations Section of the Guide to Federal, State and Local Requirements for a full discussion of air permitting requirements and the Air Recordkeeping Section of the Guide to Federal, State and Local Requirements for copies of necessary records and forms that you can use to track vehicle processing and emissions. You should review each Section carefully to ensure that you understand the basis for these requirements and how they will apply to your dealership.

STEP 3 – BEFORE YOU BEGIN APPLYING THE TUNDRA B0D CRCs, (1) CONTACT THE APPROPRIATE FIRE CODE ENFORCEMENT OFFICIAL TO NOTIFY HIM/HER OF YOUR INTENTION TO CONDUCT THE TUNDRA B0D IN THE SAME SPRAY SPACE BEING USED FOR THE TACOMA LSC 90D; AND (2) MAKE SURE THAT YOUR DEALERSHIP CAN CONDUCT THE TUNDRA B0D IN COMPLIANCE WITH FIRE, BUILDING AND ZONING CODES

The B0D CRCs are Class IIIB combustible liquids. State and local fire codes apply to the use of combustible materials. Building and zoning codes also may apply.

Your dealership can make its own choices about how best to comply with these codes. To assist you, however, we have prepared a detailed review of these requirements for your reference, which can be found in the Fire, Building and Zoning Codes Section of the Federal, State and Local Requirements Guide. You should be able to satisfy these requirements as long as you:

1. CONFIRM THAT THE B0D WORK AREA HAS VENTILATION THAT PROVIDES AT LEAST SIX (6) AIR CHANGES PER HOUR.

How Do We Determine If this Ventilation Requirement Is Met? If you conduct the B0D in the same spray space as the LSC 90D, then you already should satisfy this requirement based on the process that you went through prior to starting the LSC 90D with the two consultants retained by TMS, KPA and Commercial Construction Consulting, Inc. If you do not intend to conduct the B0D in the same spray space as the LSC 90D, then you will need a new approval from your local fire code enforcement official. As part of that approval process, you may wish to work with these same consultants retained by TMS to determine that your B0D
work area satisfies this ventilation requirement. If you are facing this situation, please call the EH&S Hotline (877-572-4341) for assistance.

2. **NOTIFY YOUR LOCAL FIRE CODE ENFORCEMENT OFFICIAL, IN WRITING, OF YOUR INTENTION TO CONDUCT TUNDRA B0D IN THE SAME SPACE BEING USED FOR TACOMA LSC 90D.**

What Do I Need To Give My Local Fire Code Enforcement Official? The Appendix to the Fire, Building and Zoning Codes Section contains all of the materials that you will need to give to your local fire code enforcement official, except that you will need to add some information about the spray space location at your dealership.

YOU MUST SEND THESE MATERIALS BEFORE CONDUCTING THE TUNDRA B0D.

3. **CONFIRM THAT YOU CAN CONDUCT THE TUNDRA B0D IN COMPLIANCE WITH BUILDING, ZONING AND FIRE CODE REQUIREMENTS.**

How Do I Confirm Compliance With Building, Zoning and Fire Code Requirements? The Fire, Building and Zoning Codes Section provides a detailed review of these requirements and includes a Table 1 that allows you to look up the city or county where you will conduct the Tundra B0D and see where it has any additional requirements applicable to the B0D.

**STEP 4 – COMPLETE THE B0D READINESS SURVEY**

You must complete the **B0D Readiness Survey** available at the C.L.E.A.N. Dealer website ([http://cleandealer.com](http://cleandealer.com)) to confirm your readiness to start the B0D. Toyota will then automatically ship one additional Vaupel HSDR 3300 spray gun (for the Noxudol 300 S material) to you at no charge.

**After We Complete Steps 1, 2, 3, and 4 Can We Start The B0D CRC Application?**

Yes, **BUT** make sure to follow:

- The detailed **Technical Instructions for the B0D Campaign**, and
- The hourly and annual vehicle processing limits discussed in Step 2 above, and
- Step 5 (air regulatory compliance records), and
- Step 6 (comply with hazardous waste requirements), and
If your dealership is located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, or Warren county (“nonattainment counties”), you must submit an Automobile Refinishing Operations Notification to the Ohio EPA district office for your county BEFORE starting the B0D and meet other requirements, as described in the Nonattainment Counties Section.

You should also review the Guide to Federal, State and Local Requirements to better understand the legal requirements for Steps 1, 2, and 3.

STEP 5 – COMPLY WITH ALL TRAINING, HOUSEKEEPING, RECORDKEEPING AND REPORTING REQUIREMENTS SPECIFIED IN THE PTIO AND/OR IN OHIO EPA REGULATIONS

The Ohio EPA has indicated that Toyota dealerships can proceed with the B0D under the PTIO issued for LSC 90D. This PTIO, along with Ohio EPA regulations, impose various training, housekeeping, recordkeeping and reporting requirements identified above under Step 2 (Item 5). Go to the Air Regulation and Recordkeeping Sections of the Federal, State and Local Requirements Guide for more information and for copies of necessary records as well as forms that you can use to track vehicle processing and emissions. (no longer use the forms provided in the LSC 90D Packet).

COMPLIANCE NOTE: Keeping accurate vehicle processing records for the LSC 90D and B0D is important because the PTIO authorizing you to conduct these CRC programs requires you to complete and submit an annual Permit Evaluation Report (PER) using the forms and following the instructions that will be mailed to you by Ohio EPA at the end of each year. The PER forms will ask you to report, among other things, the number of vehicles you processed under your PTIO during the past year. Go to the Air Regulations Section for more information and call the EH&S Hotline (877-572-4347) if you need assistance.

STEP 6 – COMPLY WITH HAZARDOUS WASTE REQUIREMENTS

You will need proper procedures in place for distinguishing between B0D-only and combined LSC 90D/B0D waste.

The B0D spray guns (for use with Noxudol 300 S and 712AM) do not need to be cleaned and the B0D materials do not constitute “hazardous waste” when discarded. Therefore, the B0D will not generate hazardous waste and it should not impact your dealership’s waste generator status (e.g., whether you are a Small Quantity Generator or a Conditionally Exempt Small Quantity Generator of hazardous waste).

However, as described in your Tacoma LSC 90D Dealer Information Packet, one of the materials used in the LSC 90D – X128T – could be hazardous waste when discarded. As a result, the LSC 90D Dealer Information Packet advises that: 1) if you frequently dispose
of the tarps (e.g. floor coverings) and/or the partition materials used in your LSC 90D work area, you will generate a larger quantity of waste, which may impact your generator status; and 2) you should manage any excess quantities of the LSC 90D materials and/or rags used to clean up any LSC 90D materials in the same manner as other hazardous waste at your dealership.

If, as we assume, you conduct the B0D in the same work area as the LSC 90D, any discarded floor tarps, partitions or other items used to clean up the common work area (e.g. rags) may contain X128T and should therefore be managed as hazardous waste. However, any materials used ONLY in the B0D, such as the plastic sheet secured to the Tundra frame when applying 712AM, should not need to be managed as hazardous waste so long as they contain no X128T waste. You should develop a waste handling procedure suitable to your operation that will ensure LSC 90D waste and combined LSC 90D/B0D waste are managed as hazardous waste.
HOW TO IMPLEMENT THE B0D

**Step 1:** Confirm that your existing Tacoma LSC 90D spray space is an appropriate spray space for Tundra B0D

Toyota is advising its dealers to **conduct the Tundra B0D in their existing Tacoma LSC 90D spray space.** If you cannot use this existing spray space for B0D, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss your particular situation.

**Step 2:** Confirm That Your Dealership Received an Air Permit from the Ohio EPA for the LSC 90D and that You Can Conduct the B0D Consistent With This Permit.

You should have received a Permit to Install and Operate (“PTIO”) from the Ohio EPA to conduct the Tacoma LSC 90D. Ohio EPA has confirmed that you may conduct the B0D under this PTIO as long as you:

1. Conduct the B0D at the address listed on the PTIO;
2. Limit vehicle processing to **no more than** (a) one Tundra every 2 hours; (b) one Tacoma every 1 hour; and (c) a total of no more than 1,398 vehicles per year under the LSC 90D and B0D combined; and
3. Comply with all training, housekeeping, recordkeeping and reporting requirements specified in the PTIO and/or in Ohio EPA regulations (see Step 5 below).

**Step 3:** Notify Your Local Fire Official In Writing Of Your Intention To Conduct The Tundra B0D In The Same Spray Space Being Used For the Tacoma LSC 90D, And Confirm Your Compliance With Building And Zoning Code Requirements.

See Fire, Building and Zoning Codes Section of this Packet for compliance and contact information.

**Step 4:** Complete The B0D Readiness Survey

Please complete the **B0D Readiness Survey** available at the C.L.E.A.N. Dealer website (http://cleandealer.com) to confirm your readiness to start the B0D. Toyota will then automatically ship one additional Vaupel HSDR 3300 spray gun (for the Noxudol 300 material) to you at no charge.

**AFTER COMPLETING STEPS 1, 2, 3 & 4 YOU CAN START APPLYING B0D MATERIALS**

**EXCEPT,** for dealers located in BUTLER, CLARK, CLERMONT, GREENE, HAMILTON, MIAMI, MONTGOMERY, OR WARREN COUNTY: You MAY NOT start the B0D until you have submitted an Automobile Refinishing Operations Notification to the Ohio EPA district office for your county.

See Nonattainment Counties Section of the Federal, State and Local Requirements Guide for instructions.

But you must follow the Technical Instructions and Steps 5 & 6 below.

**Step 5:** Comply with all training, housekeeping, recordkeeping and reporting requirements specified in the PTIO and/or in Ohio EPA regulations.

See Air Regulation and Air Recordkeeping Sections of Guide to Federal, State and Local Requirements for more details and for forms that you can use for recordkeeping (no longer use the forms provided in the LSC 90D Packet).
The steps outlined above should help you ensure that your dealership conducts the B0D in compliance with the relevant federal, state and local legal requirements. You should use this Getting Started Guide along with the other parts of the B0D Dealer Information Packet – the Guide to Federal, State and Local Requirements and the Technical Instructions.

This Information Packet is not intended to cover other air, waste management, hazardous material, water or other environmental laws and regulations that might apply to non-B0D operations at your dealership. We assume that you already comply with other environmental, health and safety requirements that apply to your facility.

If you have any questions after reviewing this information or as you proceed, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

Thank you for participating in the Tundra Corrosion-Resistant Compound Campaign B0D.

Thank you for your cooperation.

TOYOTA MOTOR SALES, U.S.A., INC.
Various legal requirements impose operational limitations on the Tundra B0D, including on the location where you may conduct it.

- If you conduct the B0D in the spray space already being used for the Tacoma LSC 90D, then this location should satisfy these state and local codes for the B0D.

- If not, however, then you will need to select a proper location to conduct the B0D. This Site Selection Section is designed to help you do so.

*If you will use the same spray space, then you can skip the Site Selection Section.*

If for some reason you cannot use the existing LSC 90D spray space for B0D, you will need to establish a new spray space. This spray space would have to meet the site selection criteria set forth below. Before selecting a new spray space and contacting the appropriate fire code enforcement official, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

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**SITE SELECTION CONSIDERATIONS**

(If you are NOT able to use the existing LSC 90D Spray Space for the Tundra B0D)

1) **YOUR B0D WORK AREA MUST BE LOCATED AT THE ADDRESS IDENTIFIED ON THE PERMIT TO INSTALL AND OPERATE ISSUED BY OHIO EPA FOR THE LSC 90D.**

2) **B0D WORK AREA MUST COMPLY WITH BUILDING, MECHANICAL AND ZONING REQUIREMENTS (e.g., has a certificate of occupancy).**

   Your B0D work area should be located in an existing building/service area that complies with building/zoning/mechanical requirements. The B0D **may not** take place outdoors.

   *Note: The information in this Packet is not intended to cover building, zoning, mechanical or other environmental or occupational health and safety laws and regulations that might apply to non-B0D operations at your dealership. We assume that you already have systems in place to comply with any other environmental, health and safety requirements that apply to your dealership.*
3) **YOUR B0D WORK AREA MUST HAVE ALL OF THE FOLLOWING:**

<p>| | |</p>
<table>
<thead>
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<tbody>
<tr>
<td>a) <strong>Adequate ventilation</strong> (whether natural or mechanical);</td>
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<td></td>
<td>The area where you will conduct the B0D must have ventilation that provides six (6) air changes per hour in the B0D work area. Consideration should be given to: (1) Locations/stalls near bay doors, other natural ventilation and/or areas with approved mechanical ventilation; and (2) where possible, locations at the end of a row of service bays and not in the middle.</td>
</tr>
<tr>
<td>Note: TMS has engaged KPA and Commercial Construction Consulting, Inc. to assist you in determining whether your LSC work area satisfies this ventilation requirement. If you have any questions, please call the EH&amp;S Hotline (877-572-4347).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b) <strong>Be at least 20 feet from:</strong> (1) open flames and/or spark-producing equipment and appliances; and (2) any drying, curing, and/or fusion apparatus;</td>
</tr>
<tr>
<td></td>
<td>c) The B0D work area must be located away from pits or other below-ground areas;</td>
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<td>d) The B0D work area must have a suitable lift that allows clear access to the vehicle’s frame rails;</td>
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<td></td>
<td>e) The floor of the B0D work area must be covered by an approved, noncombustible, nonsparking, fire retardant material;</td>
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<tr>
<td></td>
<td>f) Fire extinguishers rated “B,” “AB,” or “ABC” must be provided within 30’ (even if the work area has an automatic fire protection system); ²</td>
</tr>
<tr>
<td></td>
<td>g) Compressed air;</td>
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<td></td>
<td>h) Eyewash stations;</td>
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<tr>
<td>i) Drop lights appropriate for use during the spraying of combustible liquids; and</td>
<td>j) Any other equipment, operational and/or building features required by applicable law or indicated in the Material Safety Data Sheets (MSDSs) for the B0D materials.</td>
</tr>
</tbody>
</table>

4) **ALL B0D WORK SHOULD BE CONDUCTED IN A PARTITION ENCLOSURE** such as those depicted in the Technical Instructions, which separates the B0D from other vehicles and work areas/stalls. We assume you will use the same enclosure used to conduct the Tacoma LSC 90D, so long as it is large enough to fit a Tundra.

   To prevent the possible accumulation of combustible vapors, the partition enclosures depicted in the Technical Instructions should have sufficient open space (at least one foot (12") at the bottom of the partition to allow for ventilation. In certain spray spaces, ² A fire extinguisher should be in the vicinity even if the B0D work area has an automatic fire protection system (e.g., sprinklers).
such as an end bay space, it may be appropriate to use a partition enclosure with only three sides and to leave the fourth side open (against the end wall), thereby increasing ventilation in the work area.

OTHER REQUIREMENTS TO CONSIDER

Other Legal Requirements

The B0D is subject to other federal, state and/or local laws and codes related to air emissions, fire code approval, waste generation and recordkeeping that impose other operational limitations on it. Therefore, in addition to this Section you should carefully review the Technical Instructions and the rest of this Guide (e.g., the Air Regulations, Fire, Building and Zoning, and Hazardous Waste Management Sections).

B0D Material Storage

You may not store more than 25 gallons of combustible materials (including the B0D materials) in any fire area at your dealership. A fire area is any area in your dealership separated from the remainder of the building by construction and openings that have fire resistance ratings of at least 1 hour. You may only exceed this 25 gallon limit if the materials are stored in a fire cabinet. If you are using a fire cabinet you may store up to 120 gallons in any one cabinet and have up to 3 cabinets in any one fire area at your dealership.
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TO: OHIO TOYOTA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D
OHIO DEALER INFORMATION PACKET
GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS

Please review the entire Dealer Information Packet -- including this Guide to Federal, State and Local Requirements -- with your Service and Parts staff.

For the Tundra B0D, you will be using the same kind of spray gun – the Vaupel HSDR 3300 spray gun – as is being used for the Tacoma LSC 90D, to apply two CRCs to the interior and exterior of the frame.

- The interior CRC for B0D will be the same 712AM material being used for the Tacoma LSC 90D, and you will use the same Vaupel HSDR 3300 issued to you for LSC 90D to apply the 712AM to Tundra internal frame surfaces for the B0D.

- The exterior CRC for B0D is a material known as “Noxudol 300 S”. You will be issued one additional Vaupel HSDR 3300 to apply the Noxudol 300 S for the B0D.

The following federal, state and local legal requirements will apply to the B0D:

- Air Quality Regulations of the Ohio EPA; and

- Spraying & Storage of Combustible Liquids Under State and Local Fire, Building, and Zoning Codes.

We assume that you will use the same spray space for the Tacoma LSC 90D and the Tundra B0D and that you will use the existing LSC 90D spray space for both campaigns. If for some reason the existing LSC 90D spray space will not work for the B0D, you must relocate the spray space before contacting your local fire code enforcement official for approval, but before doing so, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss your particular situation.
The **Getting Started Guide** in the Dealer Information Packet provides a step-by-step overview of how to conduct the B0D so that your dealership will comply with these kinds of legal requirements. After you have reviewed the **Getting Started Guide** to familiarize yourself with these requirements, you should review this **Guide to Federal, State and Local Requirements**, which provides a more detailed discussion of these requirements and contains information and forms that you will need to comply with them.

This **Guide** has been organized with separate sections that address each of these kinds of legal requirements. These sections are labeled by topic so that you can easily review the information now and find the information later should questions arise when you are conducting the B0D. *Important pages that you must read are marked in red on the edge of the page. If you need additional information, you may refer to the other pages.*

This Guide to Federal, State and Local Requirements contains the following Sections:

1. **“AIR REGULATIONS” SECTION**

   a. The Air Regulations Section provides a detailed review of federal and state laws that will regulate air emissions from the Tundra B0D at your dealership.

   b. We assume that your dealership is currently exempt from federal “major source” air permitting. Your dealership will be exempt from this federal air permitting if its PTE for VOCs and PM is less than 100 tpy. You should be able to add the B0D to your current operations (including the Tacoma LSC 90D ongoing until the end of 2011) and stay well below these permitting thresholds, unless your dealership currently operates a very large body shop or otherwise engages in substantial painting, spraying or other activities similar to B0D that use spray guns.

   c. As for state “minor source” air permitting, TMS worked with you to obtain a Permit to Install and Operate (“PTIO”) from the Ohio EPA which authorized your dealership to conduct the LSC 90D. TMS has contacted the Ohio EPA and explained the B0D and its air emissions. Ohio EPA has indicated that this PTIO also will allow you to conduct the B0D as long as your dealership complies with the permit and conducts B0D in a manner that assures emissions consistent with the levels presented by TMS to Ohio EPA.

   You should be able to remain exempt from air permitting as long as your dealership

   (1) **Conducts the B0D at the address listed on the PTIO.** You should already be conducting the LSC 90D at the address specified on the PTIO. **If you intend to conduct the B0D elsewhere, then you will need a new permit.**

   (2) **Applies the CRCs in accordance with the Technical Instructions and does so ONLY in the spray space already approved by your local fire code**
enforcement official for LSC 90D. You may conduct vehicle preparation work in another service bay.

(3) Conducts the B0D in a manner that assures VOC and PM emissions will be consistent with the emissions levels presented to Ohio EPA by processing no more than one Tundra every 2 hours or more than one Tacoma every 1 hour.

(4) Adheres to the condition in the PTIO that your dealership must process no more than a total of 1,398 vehicles per year. This condition applies to the total number of vehicles processed under the LSC 90D and B0D combined.

(5) Complies with all training, housekeeping, record keeping and reporting requirements specified in the PTIO and/or in Ohio EPA regulations.

**COMPLIANCE NOTE:** Keeping accurate vehicle processing records for the LSC 90D and B0D is important because the PTIO authorizing you to conduct these CRC programs requires you to complete and submit an annual Permit Evaluation Report (PER) using the forms and following the instructions that will be mailed to you by Ohio EPA at the end of each year. The PER forms will ask you to report, among other things, the number of vehicles you processed under your PTIO during the past year. Go to the Air Regulations Section for more information and call the EH&S Hotline (877-572-4347) if you need assistance.

**IMPORTANT; ADDITIONAL REQUIREMENTS APPLY TO DEALERSHIPS LOCATED IN BUTLER, CLARK, CLERMONT, GREENE, HAMILTON, MIAMI, MONTGOMERY, OR WARREN COUNTY (“NONATTAINMENT COUNTIES”).**

If your dealership is located in one of these counties, then you must also submit an Automobile Refinishing Operations Notification to the Ohio EPA district office for your county before you begin the B0D. *(You do not need to receive a response to this notification and may start the B0D after it is submitted.)* See the Nonattainment Counties Section of the Guide to Federal, State and Local Requirements for instructions.

d. If you will not be able to adhere to the above requirements or if you will not conduct the B0D at the address listed in your dealership’s PTIO, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information

2. **“AIR RECORDKEEPING” SECTION**

a. The Air Recordkeeping Section contains copies of necessary records as well as forms that you can use to track vehicle processing and emissions (no longer use
the forms provided in the LSC 90D Packet). These records are necessary to ensure that your dealership can conduct the B0D and comply with your PTIO and with other regulatory requirements.

b. If your dealership is located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, or Warren county (“nonattainment counties”), additional recordkeeping obligations will apply. See the Nonattainment Counties Section of this Guide to Federal, State and Local Requirements for instructions.

c. As explained in the Air Regulations Section, you must maintain these documents for at least five (5) years after completing the B0D.

d. Each form in the Air Recordkeeping Section is accompanied by a version with text boxes that provides detailed instructions on how to fill out the form. In cases where you will need to do a calculation to complete the form, the form provides all of the information needed to do so.

e. The customer satisfaction portion of the B0D will end on December 31, 2012, which will alter per-truck emissions. At that time, you will be provided a new set of Technical Instructions and new forms for tracking emissions associated with the voluntary safety recall applicable to the rear portion of the frame of MY 2000-2003 Tundras, which will continue beyond December 31, 2012.

3. “FIRE, BUILDING, AND ZONING CODES” SECTION

a. The Fire, Building, and Zoning Codes Section reviews the state and local fire, building, and zoning codes. In general, these codes apply due to the combustibility of the two B0D CRCs. You should review all of the information carefully to make sure that your dealership can conduct the B0D in compliance with these codes.

b. As explained at the Fire, Building, and Zoning Codes Section, prior to implementing the B0D, your dealership will need to contact your local fire code enforcement official in order to notify the official that you plan to conduct the Tundra B0D in the same spray space as Tacoma LSC 90D.

c. Appendix A to the Fire, Building, and Zoning Codes Section contains a model letter and all of the technical information that you will need to provide to your local fire code enforcement official, except that you will need to add some information about the location at your dealership where you will conduct the B0D. If you have any questions or concerns relating to discussions with your local fire code enforcement official, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for assistance.
4. “HAZARDOUS WASTE MANAGEMENT” SECTION

a. The Hazardous Waste Management Section reviews the requirements that apply generally to hazardous wastes generated by your dealership. Please note that there are differences between B0D and LSC 90D wastes.

b. The materials used in the Tundra B0D – 712AM and Noxudol 300 S – are not considered “hazardous” waste when they are discarded. In addition, as with the Tacoma LSC 90D, the Vaupel HSDR 3300 spray guns do not need to be cleaned as long as you follow the procedures in the B0D Technical Instructions for proper gun storage. Therefore, the B0D should not generate any hazardous waste and any items used exclusively for performing the B0D – such as the plastic sheet suspended from the frame or the plastic bags used to cover the brake assemblies during spraying – do not, when discarded, need to be managed as hazardous waste. Such B0D-exclusive waste will not count toward your monthly hazardous waste generation totals.

However, one of the materials used in the Tacoma LSC 90D – X128T – may be considered a hazardous waste when discarded due to its combustibility. Therefore, assuming, the B0D will occur in the same spray space as the Tacoma LSC 90D, common materials, such as floor tarps and rags used for cleanup, will, when discarded, need to be managed as hazardous waste. Such materials will count toward your monthly waste generation totals and may impact your generator status. You should develop a procedure for your dealership to identify LSC 90D and joint LSC 90D/B0D waste as distinguished from B0D-only waste.

5. “NONATTAINMENT COUNTIES” SECTION: Dealerships located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, or Warren county are subject to additional requirements. See Nonattainment Counties Section of this Guide to Federal, State and Local Requirements for more information.

* * * * *

This Guide to Federal, State and Local Requirements is not intended to cover air, waste management, hazardous material, water or other environmental laws and regulations that might apply to non-B0D operations at your dealership. We assume that you already have systems in place to comply with any other environmental, health and safety requirements that apply to your dealership.

If you have any questions after reviewing this information or as you proceed, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for assistance.

Thank you for your cooperation and participation in the Tundra Corrosion-Resistant Compound Campaign B0D.

TOYOTA MOTOR SALES, U.S.A., INC.
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I. AIR PERMITTING REQUIREMENTS

The B0D activities result in emissions of Volatile Organic Compounds (VOCs) and Particulate Matter (PM). These substances are subject to limits on emissions to air under federal and state laws. These laws allow air emissions up to a certain level. If a facility wishes to exceed that level, then it must obtain an air permit from the state.

A. Federal “Major Source” Air Permitting

We assume that your dealership is currently exempt from federal “major source” air permitting. Your dealership will be exempt from this federal air permitting if its PTE for VOCs and for PM is less than 100 tpy.

**Important: Federal “Major Source” Air Emission Limits Apply To Your Entire Dealership.** The federal air permitting laws apply based on total emissions from an entire facility and not just from a particular building or location. For example, if your dealership’s physical plant is distributed across multiple buildings, land parcels or physical locations, then the air emissions from all of those buildings and locations would have to be combined to determine whether the dealership’s total air emissions are below air permitting levels. In some cases, even emissions from offsite locations that are not physically adjacent to a dealership (such as an offsite body shop) must be combined with the dealership’s emissions to make this air permitting determination.

You should be able to add the B0D to your current operations (including the Tacoma LSC 90D ongoing until the end of 2011) and stay well below these federal “major source” permitting thresholds as long as:

1. Your dealership does NOT currently operate a very large body shop or otherwise engage in substantial painting, spraying or other activities that use spray guns.
Important: Why Does It Matter For Federal “Major Source” Permitting If I Have A Body Shop? The federal “major source” air regulations require emissions from your entire dealership to be combined to determine whether your dealership has air emissions below air permitting levels. Because a very large body shop will have higher air emissions than a regular vehicle service area, you cannot be certain – without further analysis – that your dealership will remain exempt from air permitting after adding the B0D to its operations.

In particular, if your dealership has an onsite body shop, then the federal regulation will require you to combine the emissions from that onsite body shop with the emissions from all other activities at the dealership. In doing so, it may not be possible, if the body shop is very large, for your dealership to conduct the B0D (which would add to the air emissions already coming from your body shop) and stay exempt from air permitting. Moreover, the federal regulations might require you to combine emissions from an offsite body shop – even if the body shop is not where you will conduct the B0D – if that body shop has a sufficient interconnection to the rest of the activities at your dealership.

If your dealership has a very large onsite or an offsite body shop, please call the EH&S Hotline (877-572-4347) for assistance.

2. Your dealership WILL CONDUCT the B0D in an existing service area.

Do I Have to Conduct the B0D in an Existing Service Area? No, but if you plan to conduct the B0D in another area (such as in an offsite body shop), then you may not be able to stay exempt from air permitting and/or you may be subject to different requirements. As noted elsewhere in this Packet, we assume you will conduct the B0D in the same work area as the Tacoma LSC 90D, and that this work area is located at the address specified on your PTIO. If the common B0D-LSC 90D spray space is not in an existing service area at your dealership, or if it is not at the address listed on your PTIO, or you plan to conduct the B0D at an offsite location, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information.

B. State “Minor Source” Air Permitting

As for state “minor source” air permitting, Toyota Motor Sales, U.S.A., Inc. (TMS) worked with you to obtain a type of air permit known as a “Permit To Install and Operate” (PTIO) from the Ohio Environmental Protection Agency (Ohio EPA) authorizing your dealership to conduct the LSC 90D. TMS has contacted the Ohio EPA and explained the B0D and its air emissions. Ohio EPA has communicated that this PTIO also will allow Toyota dealers to conduct the
B0D as long as each dealership complies with the permit and conducts B0D in a manner that assures emissions consistent with the levels presented by TMS to Ohio EPA.

Based on this Ohio EPA communication, the PTIO issued to you for the LSC 90D authorizes you to conduct the B0D as long as your dealership satisfies the following criteria:

1. **CONDUCT THE B0D AT THE ADDRESS LISTED ON THE PTIO.**
   
   a. Your PTIO lists a specific address for your dealership.
   
   b. You should already be conducting the LSC 90D at this specific address.
   
   c. You must conduct the B0D at this same address, and if you intend to conduct it elsewhere, you will need a new permit.

2. **APPLY THE CRCs IN ACCORDANCE WITH THE TECHNICAL INSTRUCTIONS AND DO SO ONLY IN THE SPRAY SPACE ALREADY APPROVED BY YOUR LOCAL FIRE CODE ENFORCEMENT OFFICIAL FOR LSC 90D**
   
   a. You may conduct vehicle preparation work in another service bay.
   
   b. But, do NOT apply the CRCs in any service bay other than the one the one already approved as a spray space for LSC 90D.

REMEMBER: The Technical Instructions for the B0D require you to:

1. Apply only the “Noxudol 300 S” and “712AM” CRCs in specified quantities – no more than three liters (0.793 gallon) of Noxudol 300 S and one liter (0.528 gallon) of 712AM per truck; and

2. Use only the Vaupel HSDR 3300 spray gun equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand to apply these CRCs; and

3. Maintain the Vaupel HSDR 3300 spray gun in good working order, but **DO NOT clean the gun**. If you have any problems with your spray guns, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information.

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3 At the present time, Ohio dealers will conduct B0D in only one spray space and it will be the same spray space now being used for LSC 90D. In the future, after conclusion of the LSC 90D on December 31, 2011, TMS may decide to offer a CRC program for other Toyota vehicles. In such event, your dealership may be given the option of establishing and obtaining approval from your local fire code enforcement official for a second spray space. If so, this second spray space also would be covered by the PTIO issued for the LSC 90D as long as (1) it is located at the address listed on the PTIO; (2) you do not process more than 1 Tundra every 2 hours in that space; and (3) you adhere to any processing limits that might be required to comply with the PTIO for any other Toyota vehicles being offered a CRC program.
3. **Assure the VOC and PM emissions that occur when you are applying the CRCs are consistent with the emissions levels presented by TMS to Ohio EPA by NOT processing more than one Tundra every 2 hours or than one Tacoma every 1 hour.**

   a. “Processing” means the application of CRCs with the Vaupel HSDR 3300; it does not include vehicle preparation activities.

   b. The vehicle processing limits mean that once you begin processing a vehicle, you may not begin processing another vehicle until the 2 hours (in the case of a Tundra) or the 1 hour (in the case of a Tacoma) has passed.

   c. **Example #1**: You begin processing (i.e., applying the CRCs to) a Tundra at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a second Tundra for processing. You complete processing the first Tundra at 11:30 a.m., and by that time, you also have completed your preparation of the second Tundra for processing. You may move that second Tundra to the spray space at 11:30 a.m., but you may NOT begin processing it until 12:00 p.m. – i.e., until 2 hours after you began processing the first Tundra at 10 a.m.

   d. **Example #2**: You begin processing (i.e., applying the CRCs to) a Tacoma at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a Tundra for processing. You complete processing the Tacoma at 11:05 a.m., and by that time, you also have completed your preparation of the Tundra for processing. You may move that Tundra to the spray space and begin processing it immediately, given that more than 1 hour has passed since you began processing the Tacoma – i.e., you began processing at 10:00 a.m. and finished at 11:05 a.m.
4. **Adhere to the condition in the PTIO that your dealership must not process more than a total of 1,398 vehicles per year. This condition applies to the LSC 90D and the B0D combined.**

5. **Comply with all training, housekeeping, record keeping and reporting requirements specified in the PTIO and/or in Ohio EPA regulations as follows:**

   a. Keep air permit records that document vehicle processing and emissions of VOCs and PM from LSC 90D and B0D; retain those records for a period of 5 years after you apply CRCs to the last Tundra under the B0D.

   b. Store the CRCs when not in use, as well as the waste generated from the LSC 90D and B0D, in closed, non-absorbent, non-leaking containers.

   c. Train all staff at your dealership that will be conducting the B0D in the proper use, handling, and storage of the CRCs.

   d. Complete and submit the Annual Permit Evaluation Report, using the forms and following the instructions that will be mailed to you by Ohio EPA.

**IMPORTANT:** ADDITIONAL REQUIREMENTS APPLY TO DEALERSHIPS LOCATED IN BUTLER, CLARK, CLERMONT, GREENE, HAMILTON, MIAMI, MONTGOMERY, OR WARREN COUNTY (“NONATTAINMENT COUNTIES”).

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**Sample Stall Schedule**

<table>
<thead>
<tr>
<th>Vehicle</th>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8:00 AM - 10:00 AM</td>
<td>Cannot start processing another vehicle until 10:00 AM</td>
</tr>
<tr>
<td>2</td>
<td>10:00 AM - 12:00 PM</td>
<td>Cannot start processing another vehicle until 12:00 PM</td>
</tr>
<tr>
<td>3</td>
<td>12:00 PM - 2:00 PM</td>
<td>Cannot start processing another vehicle until 2:00 PM</td>
</tr>
<tr>
<td>4</td>
<td>2:00 PM - 4:00 PM</td>
<td>Cannot start processing another vehicle until 4:00 PM</td>
</tr>
<tr>
<td>5</td>
<td>4:00 PM - 6:00 PM</td>
<td>Cannot start processing another vehicle until 6:00 PM</td>
</tr>
<tr>
<td>6</td>
<td>6:00 PM - 8:00 PM</td>
<td>Cannot start processing another vehicle until 8:00 PM</td>
</tr>
</tbody>
</table>

Note: This sample schedule is only an example and the order of models sprayed will vary by customer appointment.
If your dealership is located in one of these counties, then you must submit an Automobile Refinishing Operations Notification to the Ohio EPA district office for your county before you begin the B0D. (You do not need to receive a response to this notification and may start the B0D after it is submitted.) See the Nonattainment Counties Section of the Guide to Federal, State and Local Requirements for instructions.

II. AIR REGULATORY REQUIREMENTS: UNDERSTANDING HOW THEY WILL APPLY TO YOUR DEALERSHIP

A. PTIO for B0D Under State “Minor Source” Air Permitting

1. Ohio EPA has indicated the PTIO that you received in connection with the LSC 90D also will allow you to conduct the B0D as long as your dealership complies with the permit and conducts B0D in a manner that assures emissions consistent with the levels presented by TMS to Ohio EPA.

2. Tundra B0D will fall within the PTIO issued to you for the LSC 90D as long as your dealership satisfies the following criteria:
   a. Conduct the B0D at the same location listed in your PTIO;
   b. Apply the CRCs only in the spray space already approved by your Local Fire Code Enforcement Official for LSC 90D.
   c. Conduct the B0D in a manner that assures VOC and PM emissions are consistent with the levels presented by TMS to Ohio EPA. To assure consistent emissions levels, your dealership should NOT process a total of more than one Tundra every 2 hours or more than one Tacoma every 1 hour;
   d. Adhere to the condition in the PTIO that your dealership must not process more than 1,398 vehicles per year total. This limit applies to vehicles processed under the LSC 90D and B0D combined; and
   e. Keep air permitting records that document vehicle processing and emissions of VOCs and PM from B0D for a period of 5 years after you apply CRCs to the last Tundra under the B0D.
   f. Comply with housekeeping, training and reporting requirements specified in the PTIO and/or Ohio EPA regulations.

B. Federal “Major Source” Air Permitting

1. Volatile Organic Compounds (VOCs): Keep Potential To Emit (PTE) Below the “Major Source” Threshold
a. The PTE for VOCs from all activities (i.e., B0D, LSC 90D and other activities) at your dealership must be less than 100 tpy.

- The B0D has a PTE for VOCs of 0.06 tons. The LSC 90D (for remaining 1996 - 2004 MY Tacomas) has a PTE for VOCs of 2.11 tons. Therefore, total PTE for VOCs from both campaigns is 2.17 tons.

- This means that all other activities at your dealership must not have combined PTE for VOCs greater than 97.83 tpy.

b. Your dealership’s current PTE for VOC should be well below these levels as long as you do not have a very large onsite or an offsite body shop or otherwise engage in substantial painting, spraying or other activities that use spray guns. Therefore, you should be able to conduct the B0D and LSC 90D at your dealership and stay below the major source air permitting threshold for VOCs.

c. If you have any questions or concerns regarding your ability to do so, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877) 572-4347.

2. Particulate Matter (PM): Keep Potential To Emit (PTE) Below 100 tpy “Major Source” Threshold

a. The PTE for PM from all activities (i.e., B0D, LSC 90D and other activities) at your dealership must be less than 100 tpy to stay exempt from air permitting.

- The B0D has a PTE for PM of 0.06 tons. The LSC 90D (for remaining 1996 – 2004 MY Tacomas) has a PTE for PM of 0.05 tons. Therefore, total PTE for PM from both campaigns is 0.10 tons.

- This means that all other activities at your dealership must not have combined PTE for PM greater than 99.90 tpy.

---

4 The VOC PTE of 0.06 tons for B0D has been calculated based on Tundra Units in Operation (UIO). For the calculation, the largest Tundra UIO for a dealership in Ohio is multiplied by the VOC emissions associated with processing 1 vehicle and then that number is multiplied by 150%. To ensure this PTE represents maximum potential emissions for application of CRCs to Tundras, the UIO used in the calculation covers not only the MYs 2000-2003 now subject to B0D, but also additional MYs 2004-2008 now being evaluated for a possible future CRC customer satisfaction program.

5 The PM PTE of 0.06 tons, as with the VOC PTE, was calculated based on Units in Operation (UIO). See Footnote 4 for further information.
b. Your dealership’s current PTE for PM should be well below 99.90 tpy.

To Qualify as Exempt from Air Permitting, Do I Have to Consider My Entire Dealership’s Operations or Only Operations at the Place Where I Will Conduct the B0D? Please remember that the air permitting exemption requirements cover YOUR ENTIRE DEALERSHIP and NOT just any buildings or locations where you will apply the LSC 90D and B0D materials. For example, if your dealership’s physical plant is distributed across multiple buildings, land parcels or physical locations, all of those buildings and locations would be subject to the requirements identified above.

C. YOUR HOUSEKEEPING AND TRAINING OBLIGATIONS

Your PTIO also requires you to:

1. Store the following materials in closed, non-absorbent, non-leaking containers when not in use:
   a. Fresh coatings;
   b. Used coatings;
   c. Solvents;
   d. VOC-containing additives and materials;
   e. VOC-containing waste materials; and
   f. Cloth, paper, or absorbent applicators moistened with any of the items listed above.

2. Train all staff at your dealership that will be conducting the B0D in the proper use, handling, and storage of the CRC materials and equipment. (You can satisfy this requirement by having those personnel carefully review this Dealer Information Packet and the Technical Instructions.)

III. AIR REGULATORY REQUIREMENTS: YOUR RECORDKEEPING OBLIGATIONS

Your PTIO contains certain recordkeeping obligations. The Air Recordkeeping Section of this Guide contains logs that you can use to create records of your vehicle processing and of VOC and PM emissions from the B0D and LSC 90D as well as other documents pertaining to these campaigns. **You must keep these records at your dealership for five (5) years beyond the date that you service the last Tundra under the B0D.**

A. Actual Air Emissions Records
1. In the Air Recordkeeping Section of this Guide, you will find the “Ohio B0D and LSC 90D Production Log” and the “Daily B0D and LSC 90D Emissions Log.” Use these forms to ensure that your emissions are under applicable limits.

B. Other Records

Your dealership must also retain copies of:

a. The PTIO issued to your dealership;

b. The Vaupel HSDR 3300 spray gun manufacturer’s specifications;

c. The Material Safety Data Sheet (MSDS) for the each B0D Material.

We have provided copies of these documents in the Air Recordkeeping Section of this Guide.

IV. ADDITIONAL AIR REGULATORY REQUIREMENTS FOR DEALERSHIPS LOCATED IN BUTLER, CLARK, CLERMONT, GREENE, HAMILTON, MIAMI, MONTGOMERY, OR WARREN COUNTY (“NONATTAINMENT COUNTIES”)

In addition to the requirements noted above, dealerships located in Nonattainment Counties are subject to additional notification, employee training, spray gun approval, and housekeeping requirements. If your dealership is located in one of these counties, please review carefully the Nonattainment Counties Section of this Guide.
IMPORTANT: Please maintain these documents in your dealership’s records for a period of five (5) years after the date that you spray the last Tundra under the B0D.

Your dealership must maintain the documents and records listed below for five (5) years after the date you treat the last Tundra under the B0D:

1. Records of the emissions from the B0D and LSC 90D (use the “Ohio B0D and LSC 90D Production Log” and the “Daily B0D and LSC 90D Emissions Log”); and

2. A brief overview of the B0D process; and

3. Your Ohio EPA PTIO; and

4. Vaupel HSDR 3300 Spray Gun Manufacturer’s Specifications; and

5. MSDS for each B0D material (NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements).

Notes:

I. To fill out the “Ohio B0D and LSC 90D Production Log” and the “Daily B0D and LSC 90D Emissions Log” see the instructions in the forms provided in this Section.

II. You do not need to do anything with items (2) to (5) above. You should simply keep those documents in your files. You will only need to provide them if requested by a government agency.

III. You must keep these records for five (5) years. Since the safety recall portion of B0D has no end date, you should keep the records for two years after the date you treat the last Tundra under the B0D.
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Ohio B0D and LSC 90D Production Log Instructions

Follow these four steps to complete the B0D and LSC 90D Production Log (see example below).

Step 1: Enter "Reporting Year" and "Dealership Name."
Step 2: Enter the date and the number of trucks that you serviced with B0D and LSC materials on that date.
Step 3: Enter the time that you completed each of the trucks treated. To comply with the hourly PM emissions limit, no Tundra should be completed within two hours of any other truck (Tundra or Tacoma) and no Tacoma should be completed within one hour of any other truck.
Step 4: Use Table 1 to fill out the rest of the log. To use Table 1, find the number of trucks that you serviced with B0D materials across the top and with LSC 90D materials down the left side, and then use the emissions values listed for each compound to fill out the remaining portions of the log.

Reporting Year: Dealership Name:

<table>
<thead>
<tr>
<th>Date</th>
<th>Number of Tundras</th>
<th>Time of Completion</th>
<th>Number of Tacomas</th>
<th>Time of Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>6-1-11</td>
<td>1</td>
<td>11:30</td>
<td>0</td>
<td>--</td>
</tr>
<tr>
<td>6-2-11</td>
<td>2</td>
<td>10:35, 2:45</td>
<td>1</td>
<td>12:00</td>
</tr>
<tr>
<td>6-3-11</td>
<td>0</td>
<td>--</td>
<td>1</td>
<td>11:45</td>
</tr>
<tr>
<td>6-4-11</td>
<td>1</td>
<td>12:00</td>
<td>1</td>
<td>2:35</td>
</tr>
<tr>
<td>6-5-11</td>
<td>2</td>
<td>11:10, 2:20</td>
<td>0</td>
<td>--</td>
</tr>
<tr>
<td>6-6-11</td>
<td>0</td>
<td>--</td>
<td>2</td>
<td>10:00, 11:15</td>
</tr>
<tr>
<td>6-7-11</td>
<td>1</td>
<td>4:00</td>
<td>2</td>
<td>10:05, 12:00</td>
</tr>
<tr>
<td>6-8-11</td>
<td>1</td>
<td>1:00</td>
<td>3</td>
<td>10:05, 2:15, 4:45</td>
</tr>
<tr>
<td>6-9-11</td>
<td>0</td>
<td>--</td>
<td>2</td>
<td>10:20, 12:00</td>
</tr>
<tr>
<td>6-10-11</td>
<td>3</td>
<td>10:35, 1:50, 5:00</td>
<td>0</td>
<td>--</td>
</tr>
</tbody>
</table>

Table 1. Emissions Values in lbs/day Based on the # of Trucks Processed in the B0D and LSC 90D

<table>
<thead>
<tr>
<th>B0D Number of TUNDRA Processed</th>
<th>0</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>LSC 90D Number of TACOMAS Processed</td>
<td>VOC = 0</td>
<td>VOC = 0.11</td>
<td>VOC = 0.22</td>
<td>VOC = 0.33</td>
<td>VOC = 0.44</td>
</tr>
<tr>
<td>0</td>
<td>PM = 0</td>
<td>PM = 0.10</td>
<td>PM = 0.20</td>
<td>PM = 0.30</td>
<td>PM = 0.40</td>
</tr>
<tr>
<td>1</td>
<td>VOC = 2.86</td>
<td>VOC = 2.97</td>
<td>VOC = 3.08</td>
<td>VOC = 3.19</td>
<td>VOC = 3.30</td>
</tr>
<tr>
<td>2</td>
<td>PM = 0.07</td>
<td>PM = 0.17</td>
<td>PM = 0.27</td>
<td>PM = 0.37</td>
<td>PM = 0.47</td>
</tr>
<tr>
<td>3</td>
<td>VOC = 5.72</td>
<td>VOC = 5.83</td>
<td>VOC = 5.94</td>
<td>VOC = 6.05</td>
<td>VOC = 6.16</td>
</tr>
<tr>
<td>4</td>
<td>PM = 0.14</td>
<td>PM = 0.24</td>
<td>PM = 0.34</td>
<td>PM = 0.44</td>
<td>PM = 0.54</td>
</tr>
<tr>
<td>5</td>
<td>VOC = 8.58</td>
<td>VOC = 8.69</td>
<td>VOC = 8.80</td>
<td>VOC = 8.91</td>
<td>VOC = 9.02</td>
</tr>
<tr>
<td>6</td>
<td>PM = 0.21</td>
<td>PM = 0.31</td>
<td>PM = 0.41</td>
<td>PM = 0.51</td>
<td>PM = 0.61</td>
</tr>
<tr>
<td></td>
<td>VOC = 11.44</td>
<td>VOC = 11.55</td>
<td>VOC = 11.66</td>
<td>VOC = 11.77</td>
<td>VOC = 11.88</td>
</tr>
<tr>
<td></td>
<td>PM = 0.28</td>
<td>PM = 0.38</td>
<td>PM = 0.48</td>
<td>PM = 0.58</td>
<td>PM = 0.68</td>
</tr>
<tr>
<td></td>
<td>PM = 0.35</td>
<td>PM = 0.45</td>
<td>PM = 0.55</td>
<td>PM = 0.65</td>
<td>PM = 0.75</td>
</tr>
<tr>
<td></td>
<td>VOC = 17.16</td>
<td>VOC = 17.27</td>
<td>VOC = 17.38</td>
<td>VOC = 17.49</td>
<td>VOC = 17.60</td>
</tr>
<tr>
<td></td>
<td>PM = 0.42</td>
<td>PM = 0.52</td>
<td>PM = 0.62</td>
<td>PM = 0.72</td>
<td>PM = 0.82</td>
</tr>
</tbody>
</table>
**Ohio B0D and LSC 90D Production Log**

**Reporting Year:**  
**Dealership name:**

<table>
<thead>
<tr>
<th>Date</th>
<th>B0D</th>
<th>LSC 90D</th>
<th>Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Use the Emissions Estimator to determine the amount of emissions for each compound below.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Number of Tundras</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>VOC</strong></td>
</tr>
</tbody>
</table>
Instructions for Completing the Daily B0D and LSC 90D Emissions Log

Follow these four steps to complete the B0D and LSC 90D Production Log (see example below).

**Step 1:** Enter the number of Tacoma and Tundra Trucks services for each day of the month.

**Step 2:** Enter the total number of trucks serviced each month.

**Step 3:** Enter total emissions for each month as follows:
1. To calculate total VOC, multiply the total number of Tundras by 0.11 and the total number of Tacomas by 2.86 and add the totals.
2. To calculate total PM, multiply the total number of Tundras by 0.10 and the total number of Tacomas by 0.30 and add the totals.

**Step 4:** Calculate the total gallons of CRC used each month by multiplying the total number of vehicles processed by the gallons of each compound used on the vehicle and adding the result for each compound.

### Day of Month
<table>
<thead>
<tr>
<th>Day of Month</th>
<th>No. of Trucks</th>
<th>Day of Month</th>
<th>No. of Trucks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tundra</td>
<td>Tacoma</td>
<td>Tundra</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>2</td>
<td>17</td>
</tr>
<tr>
<td>2</td>
<td>3</td>
<td>3</td>
<td>18</td>
</tr>
<tr>
<td>3</td>
<td>3</td>
<td>3</td>
<td>19</td>
</tr>
<tr>
<td>4</td>
<td>2</td>
<td>2</td>
<td>20</td>
</tr>
<tr>
<td>5</td>
<td>3</td>
<td>3</td>
<td>21</td>
</tr>
<tr>
<td>6</td>
<td>0</td>
<td>0</td>
<td>22</td>
</tr>
<tr>
<td>7</td>
<td>0</td>
<td>0</td>
<td>23</td>
</tr>
<tr>
<td>8</td>
<td>3</td>
<td>3</td>
<td>24</td>
</tr>
<tr>
<td>9</td>
<td>1</td>
<td>1</td>
<td>25</td>
</tr>
<tr>
<td>10</td>
<td>0</td>
<td>0</td>
<td>26</td>
</tr>
<tr>
<td>11</td>
<td>3</td>
<td>3</td>
<td>27</td>
</tr>
<tr>
<td>12</td>
<td>4</td>
<td>4</td>
<td>28</td>
</tr>
<tr>
<td>13</td>
<td>0</td>
<td>0</td>
<td>29</td>
</tr>
<tr>
<td>14</td>
<td>0</td>
<td>0</td>
<td>30</td>
</tr>
<tr>
<td>15</td>
<td>0</td>
<td>0</td>
<td>31</td>
</tr>
<tr>
<td>16</td>
<td>0</td>
<td>0</td>
<td>Total Trucks</td>
</tr>
</tbody>
</table>

### Emissions from LSC

<table>
<thead>
<tr>
<th>Material Used</th>
<th>Emissions per Tacoma</th>
<th>Emissions per Tundra</th>
<th>Total Emissions per Month (lbs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC</td>
<td>2.86 lbs</td>
<td>0.11 lbs</td>
<td>147</td>
</tr>
<tr>
<td>PM</td>
<td>0.30 lbs</td>
<td>0.10 lbs</td>
<td>20</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Material Used</th>
<th>Gallons Used per Tacoma</th>
<th>Gallons Used per Tundra</th>
<th>Gallons Used per Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>X128T *</td>
<td>0.793 gal (3 L)</td>
<td>0</td>
<td>39.65</td>
</tr>
<tr>
<td>712AM **</td>
<td>0.528 gal (2 L)</td>
<td>0.264 gal (1 L)</td>
<td>39.60</td>
</tr>
<tr>
<td>Noxudol 300 TS***</td>
<td>0</td>
<td>0.793 gal (3 L)</td>
<td>39.65</td>
</tr>
</tbody>
</table>

Total gallons of materials per month 118.90
(This page intentionally left blank.)
Dealerships may use this log to track the number of trucks serviced under the LSC on a daily basis. Start a new log each month.

<table>
<thead>
<tr>
<th>Day of Month</th>
<th>No. of Trucks</th>
<th>Day of Month</th>
<th>No. of Trucks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tundra</td>
<td>Tacoma</td>
<td>Tundra</td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td>17</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td>18</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td>19</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td>20</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td>21</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td>22</td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td>23</td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td>24</td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td>25</td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td>26</td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td>27</td>
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<td>12</td>
<td></td>
<td></td>
<td>28</td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td>29</td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td>30</td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td>31</td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Emissions from LSC**

<table>
<thead>
<tr>
<th>Emissions per</th>
<th>Emissions per</th>
<th>Total Emissions per</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tacoma</td>
<td>Tundra</td>
<td>Month (lbs)</td>
</tr>
<tr>
<td>VOC</td>
<td>2.86 lbs</td>
<td>0.11 lbs</td>
</tr>
<tr>
<td>PM</td>
<td>0.30 lbs</td>
<td>0.10 lbs</td>
</tr>
</tbody>
</table>

**Material Used**

<table>
<thead>
<tr>
<th>Material Used</th>
<th>Gallons Used per</th>
<th>Gallons Used per</th>
<th>Gallons Used per</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tacoma</td>
<td>Tundra</td>
<td>Month</td>
</tr>
<tr>
<td>X128T *</td>
<td>0.793 gal (3 L)</td>
<td>0</td>
<td>0.793 gal (3 L)</td>
</tr>
<tr>
<td>712AM **</td>
<td>0.528 gal (2 L)</td>
<td>0.264 gal (1 L)</td>
<td>0.792 gal (2 L)</td>
</tr>
<tr>
<td>Noxudol 300 S***</td>
<td>0</td>
<td>0.793 gal (3 L)</td>
<td></td>
</tr>
</tbody>
</table>

Total gallons of materials per month

* VOC content of X128T is 3.5 lbs/gal
** VOC content of 712AM is 0.165 lbs/gal
*** VOC content of Noxudol 300 S is 0.089 lbs/gal

This record must be maintained for 5 years.
Duplicate as Necessary
(This page intentionally left blank.)
Dealers should use this document to estimate the amount of emissions resulting from the B0D and the LSC 90D. These estimates are needed to complete the tables in the Ohio B0D and LSC 90D Production Log.

Instructions For Using This Document

Follow the steps below to estimate the daily emissions resulting from the B0D and LSC 90D.

1. At the end of each day, record the number of Tundra and Tacoma trucks processed that day.

2. At the end of each month, determine the total number of Tundra and Tacoma trucks processed that month.

3. Use the table below to estimate the amount of regulated air emissions emitted as a result of B0D and LSC 90D operations that month.

   - Determine the ratio of Tundra to Tacoma trucks processed in the month.
   - The intersection of the B0D column and LSC 90D row provides the emissions estimate (in pounds) for two regulated emissions from the B0D and LSC 90D materials - Volatile Organic Compounds (VOC) and Particulate Matter (PM) at a given ratio.
   - Multiply these figures by the appropriate multiplier to arrive at the total pounds of VOC and PM emitted in that month.
   - For example, if you processed 15 Tundras and five Tacomas in a month, the ratio of Tundras to Tacomas is 3 to 1: VOC = 3.19 lbs; PM = 0.37 lbs. Multiply each of these numbers by 5 to arrive at the total estimated emissions for the month: VOC = 15.95 lbs/month; PM = 1.85 lbs/month.

4. For each of the two regulated compounds, copy the emissions estimate into the column for that compound in the Ohio B0D and LSC 90D Production Log.

Table 1. Emissions Values in lbs/day Based on the Number of Trucks Processed in the B0D and LSC 90D

<table>
<thead>
<tr>
<th>LSC 90D Number of TACOMAS Processed</th>
<th>0</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>VOC = 0</td>
<td>VOC = 0.11</td>
<td>VOC = 0.22</td>
<td>VOC = 0.33</td>
<td>VOC = 0.44</td>
</tr>
<tr>
<td></td>
<td>PM = 0</td>
<td>PM = 0.10</td>
<td>PM = 0.20</td>
<td>PM = 0.30</td>
<td>PM = 0.40</td>
</tr>
<tr>
<td>1</td>
<td>VOC = 2.86</td>
<td>VOC = 2.97</td>
<td>VOC = 3.08</td>
<td>VOC = 3.19</td>
<td>VOC = 3.30</td>
</tr>
<tr>
<td></td>
<td>PM = 0.07</td>
<td>PM = 0.17</td>
<td>PM = 0.27</td>
<td>PM = 0.37</td>
<td>PM = 0.47</td>
</tr>
<tr>
<td>2</td>
<td>VOC = 5.72</td>
<td>VOC = 5.83</td>
<td>VOC = 5.94</td>
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<tr>
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<td>PM = 0.62</td>
<td>PM = 0.72</td>
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</tbody>
</table>
(This page intentionally left blank.)
The Tundra Corrosion-Resistant Compound Campaign B0D (B0D) comprises two processes:

1) **Safety Recall B0D Application Area**, which entails application of Noxudol 300 S to the external surfaces of the rear portion of the Tundra frame. This procedure is available to customers without a time limit.

2) **Customer Satisfaction Program Application Area**, which entails application of Noxudol 300 S to the external surface, and application of 712AM to the internal surface, of the front portion of the frame. This procedure is available until 12/31/2012.

All Tundra B0D activities will occur indoors at existing dealership service areas that comply with fire, zoning and building codes. The B0D will consist of the three primary steps discussed below.

**Step 1: Initial Work Area Setup.** Locate dedicated work area in dealership’s service area that has a vehicle lift, is well ventilated, is away from other vehicles, and can be sectioned off with temporary partitions. No physical alteration of the workspace or installation of new equipment is required for the B0D. You should use the work area already used for the Tacoma LSC 90D if it is large enough to accommodate the Tundra.

**Step 2: Vehicle Preparation.** Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

- **Remove truck bed assembly.**
- **Clean frame, if necessary.** It may be necessary to clean the frame, including pressure washing. No chemicals or solvents will be used to clean the frame.
- **Place vehicle on lift.** Raise the vehicle using the vehicle lift; remove certain vehicle components (e.g., tires and wheels, spare tire, engine under cover).
- **Work area setup.** Place tarp beneath vehicle and set up temporary partitions around vehicle. Tarps are intended to capture limited overspray and to facilitate clean-up.
- **Prepare frame.** Manually remove rust from frame using scraper, wire brush, and/or compressed air.
- **Mask parts.** Mask areas not to be sprayed (e.g., drive shaft, brake/hub assemblies, exhaust).
- **Attach Plastic Sheet:** To capture any 712AM that may drip through small holes in the frame, use magnets to suspend a plastic sheet underneath the front portion of the frame.
Step 3: Material Application. Dealers will apply the B0D Corrosion-Resistant Compounds as follows:

- **Apply 712AM.** Set up Vaupel spray gun and insert 8mm spray nozzle a specified distance into selected holes in the frame. Press spray gun trigger and pull out nozzle at fixed speed while spraying interior surface of frame with one liter of 712AM. When finished, insert rubber plugs and foam blocks to keep 712AM in the frame.

- **Remove plastic sheet suspended from frame.**

- **Lower lift.** Lower the lift until the top of the rear portion of the frame is approximately 4'6" above the floor.

- **Apply Noxudol 300 S to top external surface of rear portion of frame.** Set up Vaupel spray gun and locate unidirectional handheld spray nozzle 4-8 inches from frame surface. Press spray gun trigger and spray Noxudol 300 S on the top of rear portion of the frame by moving spray nozzle at fixed speed across frame surface.

- **Reattach truck bed assembly.**

- **Raise truck on lift.**

- **Apply Noxudol 300 S to frame bottom and side external surfaces.** From the same working distance, press spray gun trigger and apply remaining Noxudol 300 to bottom and side external surfaces of entire frame at fixed speed. Refill spray gun with Noxudol 300 as needed until all three (3) liters of material are used.

- **Final steps.** Reinstall components of vehicle; remove all masking; remove truck from lift; and spray Noxudol 300 S on areas of frame previously covered by lift arms. Allow 712AM and Noxudol 300 S to cure overnight before returning vehicle to customer. Comply with any recordkeeping and material handling requirements.
AUG 27 2009

Chuck Taylor, P.E.
GT Environmental/Toyota Motor Sales, Inc.
635 Park Meadow Road, Suite 112
Westerville, Ohio 4343081

Re: Vaupel HSDR 3300 spray gun transfer efficiency vs HVLP

Dear Mr. Taylor

This letter is in response to your letter dated August 3, 2009, in which you requested written approval to authorize the use of the Vaupel HSDR 3300 spray gun for the proposed implementation of a Limited Service Campaign (LSC) by Toyota Motor Sales in Ohio pursuant to Ohio Administrative Code (OAC) 3745-21-18(C)(1)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your letter, the supporting test documentation included in your letter and the approval letter from the South Coast Air Management District (SCAQMD) dated March 10, 2009.

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected county, specified in OAC rule 3745-21-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(1)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted indicates that the Vaupel HSDR 3300 spray gun is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as similarly found in the SCAQMD approval letter) and shall apply to any equipment operated in the affected counties in Ohio:

a. The Vaupol HSDR 3300 spray gun shall only be used to apply Daubert NOX-RUST X128T and NOX-RUST 712AM corrosion preventive coatings to the frame rails of Toyota Tacoma trucks model years 2001-2004 at the approved Toyota
dealerships in Ohio that have been authorized to perform such service during the Limited Service Campaign.

b. This approval is only valid if the air pressure supplied to the Vaupel HSDR 3300 spray gun is equal to or less than 50 psig when applying the Daubert NOX-RUST X128T coating and equal to or less than 75 psig when applying the Daubert NOX-RUST 712AM coating.

c. This approval is only valid if during actual operation the Vaupel HSDR spray gun is equipped with a 160 psig (full scale) mechanical pressure gauge with markings every 2 psig and the pressure gauge is operating properly.

d. The Vaupel HSDR 3300 spray gun shall be equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand when applying the corrosion preventive coatings. The Daubert NOX-RUST X128T protective coating shall only be applied to the exterior of the frame rails. The Daubert NOX-RUST 712AM protective coating shall only be applied to the interior of the frame rails. During operation, the maximum distance of the spray wand tip to the substrate to be coated shall not exceed 12 inches.

e. This approval is only valid for the Vaupel HSDR 3300 spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by Ohio EPA.

By means of this letter I am approving the use of the Vaupel HSDR 3300 spray gun as an equivalent coating application method. Ohio EPA will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method and will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a link on our website for this rule which will indicate that this spray gun has been approved as an equivalent method to HVLP.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,

[Signature]

Chris Korleski
Director
Ohio EPA

cc: Lee Burkleca, DAPC
This gun may only be used for pressure containers which threads have a slot

**Use as intended**
- The CAVITY PRESSURE CONTAINER GUN is used for applying cavity spray products in conjunction with cavity spray tubes 3900 / 3901.

**For your safety**
- Hazard-free work with the device is only possible if you read the operating instructions and safety instructions through in full and strictly follow the instructions contained therein.
- Arrange to have practical instruction before your first use.
- Check the device before each use.
- Allow only a specialist to make repairs.
- Alteration or modification of the device is forbidden.
- Use only original accessories.
- Use the device only with the prescribed pressure.
- Do not spray into flames or onto glowing bodies.
- Do not inhale spray mist.
- Store the device and its accessories out of reach of children.

**Device Characteristics**

| Max. Press. | 8 bar | Working Press. | 2–6 bar | Capacity | 1 liter |

**Safety Instructions**
- Check the gun for correct operation before use.
- The nozzle head (19) and ascending tube (31) must allow free flow.
- Check the gun for visible damage.
- When dealing with chemical materials, observe the appropriate guidelines and safety rules.

**Start up**
- Check line pressure in the compressed-air distribution system and adjust if necessary.
- For optimal operation of the compressed-air tool, clean, dry air is absolutely necessary.
- This can be provided by a water and oil separator integrated into the compressed-air system, which also considerably improves the spray behaviour.

**Working Instructions / Application**
- Fill the pressure container (32) with spray product.
- Immerse the pistol body with ascending tube into the spray product and screw the container to the underside of the gun.
- Insert cavity spray tube with round spray nozzle or cavity spray tube with angle nozzle and nipple into the quick coupling (20).
- Connect the gun to the compressed-air supply.
- Depress the trigger to the first step and check whether spray air issues from the nozzle opening.
- Material flow rate is adjusted using the stop screw (7). An optimal spray pattern for each material can be obtained with this adjustment.
- Insert the spray tube with round nozzle into the cavity and slowly withdraw it, while at the same time depressing the trigger. Release the trigger before the round nozzle leaves the cavity (this will interrupt material flow).
- When the spray tube with angle nozzle is inserted, surfaces can be sprayed.
- Make absolutely certain that the spray tubes are not bent.

**When finished working**
- Blow the cavity spray tube clear with air; for this, depress the trigger to the first step.
- Remove cavity spray tube; disconnect the device from the air supply.
- Release pressure from the gun; for this purpose, turn the pressure container to the left until air escapes.
- Store the device and its accessories out of reach of children.
- Store the gun only upright if material remains in the pressure tank.

**Cleaning**
- Clean the gun after each use with cleaning agent. (If the gun is to remain unused for an extended period of about 4 weeks).

**Attention**
- Store the spray tubes only when they are clean; otherwise the spray slits may become clogged due to drying of the material.

**Faults**
- Valve bolt (8) is stuck or does not close:
  - Put oil on the valve bolt or into the air intake port of the gun. Depress the trigger (2) several times.
- Gun does not spray properly:
  - Spray nozzle (19), ascending tube (31), cavity spray tube round spray or angle nozzle or gun (1) partly clogged. Remove deposits with cleaning agent.

**Environmental Protection**
- The device, its accessories and packing material should be recycled in an environmentally correct manner.
Druckbehälterpistole
pressure container gun

This gun may only be used for pressure containers which treads have a slot.
SECTION 1: PRODUCT IDENTIFICATION

Product Name: 712AM
Chemical Family: Petroleum oil/additive blend
Material Usage: Corrosion Preventive Compound

EMERGENCY OVERVIEW: Petroleum oil-based product. When product burns it releases typical hydrocarbon products of combustion. Refer to Section 3 for health effects and to Section 5 for fire hazard data.

SECTION 2: HAZARDOUS INGREDIENTS

<table>
<thead>
<tr>
<th>Component</th>
<th>Wt%</th>
<th>Recommended Exposure Limits (TWA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Microcrystalline wax</td>
<td>5-10</td>
<td>ACGIH TLV: 2 mg/m³</td>
</tr>
<tr>
<td>CAS #64742-42-3</td>
<td></td>
<td>OSHA PEL: 2 mg/m³</td>
</tr>
<tr>
<td>Petroleum distillates, solvent dewaxed</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³</td>
</tr>
<tr>
<td>heavy paraffinic</td>
<td></td>
<td>OSHA PEL: 5 mg/m³</td>
</tr>
<tr>
<td>CAS #64742-65-0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sulfonic acids, petroleum,</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>Calcium salts, overbased</td>
<td></td>
<td>OSHA PEL: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>CAS #68783-96-0</td>
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<td></td>
</tr>
<tr>
<td>White mineral oil, petroleum</td>
<td>50-60</td>
<td>ACGIH TLV: 5 mg/m³ (oil mist)</td>
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<tr>
<td>CAS #8042-47-5</td>
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<td>OSHA PEL: 5 mg/m³ (oil mist)</td>
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<tr>
<td>Bentonite, quaternary ammonium</td>
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<td>Not established</td>
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<tr>
<td>compound modified</td>
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<td></td>
</tr>
<tr>
<td>CAS# 68953-58-2</td>
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</tr>
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Soybean oil polymer with isophthalic acid and pentaerythritol 0.4-4 Not established
CAS# 66071-86-1

Castor oil, dehydrated, polymerized 5-15 Not established
CAS# 68038-02-8

Calcium Carbonate 5-10 OSHA PEL: 5 mg/m³ (respirable fraction)
OSHA PEL: 15 mg/m³ (total dust)
ACGIH TLV: 10 mg/m³ ([2] nuisance dust)

CAS #471-34-1

[2] This component poses a hazard only if a dust is formed, i.e., by sawing, sanding, drilling, etc.

SECTION 3: HEALTH HAZARD INFORMATION

Primary Routes of Entry: Skin absorption, eyes (splashing).

Acute Effects: May cause eye irritation and reversible skin irritation. Prolonged skin exposure may cause dermatitis or oil acne. Breathing mists may cause dizziness or pulmonary irritation.

Chronic Overexposure:
Carcinogenicity: None of the components of this product are listed as carcinogens by NTP, IARC, or OSHA 1910(Z).

Pre-Existing Medical Conditions Aggravated by Exposure: Exposure may aggravate pre-existing respiratory or skin problems.

SECTION 4: FIRST AID PROCEDURES

Inhalation (mist): Move victim to fresh air and call emergency medical care. If not breathing, give artificial respiration; if breathing is difficult, give oxygen.

Eyes: In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Seek immediate medical attention.

Skin: Wash skin with soap and water. Remove and isolate contaminated clothing and shoes at the site.

Ingestion: DO NOT INDUCE VOMITING. Consult a physician. If vomiting occurs spontaneously, keep head below hips to prevent aspiration of liquid into the lungs.

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC )
Explosive Limits: LEL: N/A UEL: N/A

EXTINGUISHING MEDIA: Small Fires: Dry chemical, CO₂, water spray, or regular foam. Large Fires: Water spray, fog, or regular foam. Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles. If this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

Special Firefighting Protection/Emergency Action: Fire may produce irritating or poisonous gases. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection. Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Isolate for 1/2 mile in all directions if tank, rail car or tank truck is involved in fire. If runoff from fire control occurs, notify the appropriate authorities.

Unusual Fire/Explosion Hazards: Combustible material; may be ignited by flames. Container may explode in heat of fire.

Products of Combustion: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.
SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Steps to be taken in case Material is Released or Spilled:  Shut off ignition sources; no flares, smoking or flames in hazard area. Stop leak if you can do it without risk.
Small Spills:  Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills:  Dike far ahead of liquid spill for later disposal.

SECTION 7: SAFE HANDLING INFORMATION

Precautions To Be Taken In Handling/Storage:  Store in cool, well-ventilated area. Keep away from flames. Never use a torch to cut or weld on or near container.
Other Precautions:  Never wear contaminated clothing. Launder or dry clean before wearing. Discard oil-soaked shoes. Wash thoroughly with soap and water (waterless hand cleaner may be helpful in removing residues) after use and before smoking or eating. Avoid excessive skin contact.

SECTION 8: EXPOSURE CONTROLS

Respiratory Protection:  NIOSH-approved respirator for organic vapor and mist to control exposure where ventilation is inadequate.
Ventilation:  General and local exhaust.
Personal Protective Equipment:  Protective Gloves: Impervious gloves (Viton, PVOH, etc.) Eye Protection: Safety glasses with sideshields or chemical goggles. Other Protective Clothing or Equipment: If splashing is anticipated, wear rubber apron and boots or other protective equipment to minimize contact.

SECTION 9: REACTIVITY HAZARD DATA

Stability:  Stable
Incompatibility:  Strong acids, oxidizing agents.
Hazardous Decomposition Products:  Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.
Hazardous Polymerization:  Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

Color:  Tan
Appearance:  Viscous Liquid
Odor:  Oil
Boiling Point (initial):  NA
Evaporation Rate (n-Butyl Acetate=1):  <<1
Vapor Pressure (mmHg @ 20°C):  3.4
Vapor Density (air=1):  NA
Solubility in Water:  Not Determined
Specific Gravity:  .9-1.0
pH:  Not Applicable
Percent Volatile by Volume:  0

SECTION 11: DISPOSAL CONSIDERATIONS

Waste Disposal Methods:  Dispose of in accordance with state, local and federal regulations. Materials may become a hazardous waste through use. If permitted, incineration may be practiced. Consider recycling solvent.
SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)
VOC per gallon: 0.165 lbs/gal

EPA Hazardous Waste Number(s) (40CFR Part 261): D001
EPA Hazard Category (40CFR Part 370): DELAYED (CHRONIC)

SARA TITLE III
This product contains the following TOXIC CHEMICALS subject to the Reporting Requirements of Sec. 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and of 40CFR Part 372:

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>WT %</th>
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<tbody>
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This product contains the following EXTREMELY HAZARDOUS SUBSTANCE(S) subject to the Emergency Planning Requirements under Sec. 301-303 (40CFR Parts 300 and 355) and Emergency Release Notification Requirements under Sec. 304:

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>WT %</th>
<th>RQ/TPQ Lbs</th>
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</thead>
<tbody>
<tr>
<td>NONE</td>
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</tbody>
</table>

(CERCLA LIST) This product contains the following HAZARDOUS SUBSTANCE(S) subject to Emergency Release Notification Requirements under Sec. 304 (40 CFR Part 302):

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>WT %</th>
<th>Final RQ Lbs</th>
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</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

CALIFORNIA PROPOSITION 65
This product may contain trace quantities of the following chemicals that are identified by the State of California under the Safe Drinking Water and Toxic Reinforcement Act of 1986 ("Proposition 65") as either a carcinogenic or reproductive hazard:

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>Estimated Concentration %</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

Although the information contained herein is believed to be reliable, it is furnished without warranty of any kind. This information is not intended to be all-inclusive as to the manner and conditions of use, handling, and storage.
1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S  
Synonyms: None  
Product Codes: None  
Chemical Name: Anti Rust Compound

Product Use: Vehicle Underbody Coating

Manufacturer: Auson AB  
US Distributor: Soken Trade Corporation  
Verkstadsgatan 3  
12055 Sherman Way  
S-434 42 Kungsbacka  
North Hollywood, CA  
Sweden  
USA  
www.auson.se  
www.noxudolusa.com

PHONE:  +46 300-562000  
FAX:  +46 300-562001

For Chemical Emergency (Spill, Leak, Fire, Exposure, or Accident) Call CHEMTREC Day or Night  
USA or Canada: 1-800-424-9300 Outside USA or Canada: +1 703-527-3887 (collect calls ok)

PREPARED BY: MSDS Authoring Services  
ISSUE DATE: March 1, 2011  
VERSION: 1  
SUPERSEDES DATE: None

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>Amount % by Wt.</th>
<th>CAS Number</th>
<th>OSHA PEL (ppm)</th>
<th>ACGIH STEL (ppm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solvent-refined heavy paraffinic distillate</td>
<td>30-60%</td>
<td>64741-88-4</td>
<td>5</td>
<td>None</td>
</tr>
<tr>
<td>Petroleum sulfonate, calcium salt, calcium hydroxide and calcium carbonate dispersion</td>
<td>20-30%</td>
<td>68783-96-0</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Fatty acids, tall-oil, polymers with isophthalic acid, pentaerythritol and tall oil</td>
<td>10-20%</td>
<td>68410-37-7</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Paraffin and hydrocarbon waxes</td>
<td>10-20%</td>
<td>8002-74-2</td>
<td>None</td>
<td>2 (fume)</td>
</tr>
<tr>
<td>Calcium carbonate (limestone) used as filler/pigment</td>
<td>&lt;2%</td>
<td>1317-65-3</td>
<td>15 for total dust; 5 for respirable fraction</td>
<td>10 for total dust; 3 for respirable fraction</td>
</tr>
<tr>
<td>Carbon black</td>
<td>1%</td>
<td>1333-86-4</td>
<td>3.5</td>
<td>3.5</td>
</tr>
<tr>
<td>Crystalline silica</td>
<td>&lt;0.1%</td>
<td>14808-60-87</td>
<td>10/(%SiO2+2) (respirable)</td>
<td>2.5</td>
</tr>
</tbody>
</table>

California Prop 65: This product may contain trace quantities of chemicals that are identified by the State of California under the Safe Drinking Water and Toxic Reinforcement Act of 1986 (“Proposition 65”) as either a carcinogenic or reproductive hazard.

HAZARDS DISCLOSURE: This product contains known hazardous materials in reportable levels as defined by the OSHA Hazard Communication Standard 29 CFR 1910.1200 except as listed above. As defined under Sara 311 and 312, this product contains known hazardous materials.
3. HAZARDS IDENTIFICATION

**EMERGENCY OVERVIEW:**
CAUTION! COMBUSTIBLE LIQUID.

HMIS/NFPA Rating: See Section 16

**POTENTIAL HEALTH EFFECTS**

**ROUTES OF ENTRY:** Skin contact, eye contact, inhalation and ingestion.

**INHALATION:** High vapor concentrations may cause headache, dizziness, fatigue, nausea, and vomiting.

**INGESTION:** May cause abdominal pain, nausea, and vomiting.

**SKIN CONTACT:** Contact may be irritating to skin. May defat skin.

**EYE CONTACT:** Contact may be irritating to eyes. May cause stinging.

**CHRONIC EXPOSURE:** There are currently no known adverse health effects associated with chronic exposure to this product.

**ACUTE HEALTH HAZARDS:** Moderate irritating to the skin. Slightly irritating to the eyes. May be harmful if inhaled.

**AGGRAVATION OF PRE-EXISTING CONDITIONS:** Persons with pre-existing skin disorders, eye problems, or respiratory function may be more susceptible to the effects of this substance.

**TARGET ORGANS:** Eyes, skin, and respiratory system.

**CARCINOGENICITY:**
OSHA: Not listed  ACGIH: Not listed  NTP: Not listed  IARC: Not listed

**POTENTIAL ENVIRONMENTAL EFFECTS:** Not considered to be harmful to aquatic life.

4. EMERGENCY AND FIRST AID PROCEDURES

**INHALATION FIRST AID:** If inhalation is experienced or suspected, move exposed person to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately if symptoms persist.

**SKIN CONTACT FIRST AID:** In case of contact, immediately flush skin with soap and water. Remove contaminated clothing and shoes. Wash clothing before reuse. Call a physician if irritation develops.

**EYE CONTACT FIRST AID:** Immediately flush eyes with plenty of water for at least 15 minutes, lifting lower and upper eyelids occasionally. Get medical attention immediately if symptoms persist.

**INGESTION FIRST AID:** If swallowed, give a few tablespoons of cooking oil, sour cream, cream, or other liquid fat. Contact the poison control center. DO NOT INDUCE VOMITING unless directed to by a poison control center or physician. Never give anything by mouth to an unconscious person.

**STATEMENT OF PRACTICAL TREATMENT:** Always have plenty of water available for first aid. Get medical attention if any symptoms develop or persist.

**NOTES TO PHYSICIANS OR FIRST AID PROVIDERS:** This product has low oral, dermal, and inhalation toxicity. Aspiration during swallowing or vomiting may severely damage the lungs.
5. FIRE AND EXPLOSION HAZARD DATA

FLAMMABLE PROPERTIES: Not flammable. Combustible.

AUTO IGNITION TEMPERATURE (ASTM E659):
HOT-FLAME AUTOIGNITION TEMPERATURE (AIT):
MINIMUM IGNITION TEMPERATURE: 750°F
IGNITION DELAY: 12 Seconds
BAROMETRIC PRESSURE, TORR: 766

COOL-FLAME AUTOIGNITION TEMPERATURE (CFT):
MINIMUM IGNITION TEMPERATURE: 745°F
IGNITION DELAY: 120 Seconds
BAROMETRIC PRESSURE, TORR: 766

REACTION THRESHOLD TEMPERATURE FOR PRE-FLAME (RTT):
MINIMUM REACTION TEMPERATURE: 740°F

LIMITS OF FLAMMABILITY IN GENERAL ACCORDANCE WITH ASTM E-681 AT 200°C
LOWER FLAMMABLE LIMIT (LFL): 1.81 %
UPPER FLAMMABLE LIMIT (UFL): See Note

Note: Due to the nature of the sample and its addition into the test apparatus, it is difficult to determine the upper flammable limit.

FLASH POINT: 140°C  285°F  Method Used: ASTM D93

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

FIRE & EXPLOSION HAZARDS: Above flash point, vapor-air mixtures are explosive within flammable limits noted above. Containers may explode when involved in a fire.

PRECAUTIONS FOR FIREFIGHTERS: In the event of a fire, wear full protective clothing and NIOSH-approved self-contained breathing apparatus with full face piece operated in the pressure demand or other positive pressure mode. Toxic gases and vapors may be released if involved in a fire.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

PERSONAL PRECAUTIONS: Wear appropriate protective clothing (see SECTION 8). Isolate release area and deny entry to unnecessary and unprotected personnel.

ENVIRONMENTAL PRECAUTIONS: Do not allow spill to enter sewers or waterways. Do not flush to sewer.

METHODS FOR CONTAINMENT: Contain spill with sand or earth. Do not use combustible materials, such as sawdust.

METHODS FOR CLEAN-UP: Collect spilled material and non-combustible absorbent and place in a container for disposal. Clean spill area thoroughly.

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE
RECOMMENDED STORAGE CONDITIONS: Keep in a tightly closed original container, at temperatures less than 105°F (40°C). Keep containers closed when not in use.

SHELF LIFE: See label on packaging.

HANDLING (PERSONNEL): Wear appropriate personal protective equipment (see SECTION 8). Avoid contact with eyes. Avoid contact with skin or clothing. Avoid breathing vapors. Use only with adequate ventilation. Wash thoroughly with soap and water after handling. Keep away from heat, flames, and sparks.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

<table>
<thead>
<tr>
<th>CAS NO.</th>
<th>CHEMICAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>64741-88-4</td>
<td>Solvent-refined heavy paraffinic distillate</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>5 mg/m³</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>none</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>none</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>5</td>
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<tr>
<td>ACGIH TLV STEL:</td>
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<tr>
<td>ACGIH TLV CEILING:</td>
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</tr>
<tr>
<td>68783-96-0</td>
<td>PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION</td>
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</tr>
<tr>
<td>OSHA PEL STEL:</td>
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<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>NONE</td>
</tr>
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<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
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<tr>
<td>68410-37-7</td>
<td>FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL</td>
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<td>NONE</td>
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<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
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<tr>
<td>ACGIH TLV-TWA:</td>
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<td>8002-74-2</td>
<td>PARAFFIN AND HYDROCARBON WAXES</td>
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<td>OSHA PEL-TWA:</td>
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<td>OSHA PEL STEL:</td>
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<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
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<tr>
<td>ACGIH TLV-TWA:</td>
<td>2 (FUME)</td>
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<td>ACGIH TLV STEL:</td>
<td>NONE</td>
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<tr>
<td>ACGIH TLV CEILING:</td>
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</tr>
</tbody>
</table>

CALIFORNIA PROPOSITION 65: This product may contain trace quantities of chemicals that are identified by
the state of California under the safe drinking water and toxic reinforcement act of 1986 ("proposition 65") as either a carcinogenic or reproductive hazard:

1317-65-3  CALCIUM CARBONATE (LIMESTONE)  MG/M3
OSHA PEL-TWA:  15 FOR TOTAL DUST; 5 FOR RESPIRABLE FRACTION
OSHA PEL STEL:  NONE
OSHA PEL CEILING:  NONE
ACGIH TLV-TWA:  0 FOR TOTAL DUST; 3 FOR RESPIRABLE FRACTION
ACGIH TLV STEL:  NONE
ACGIH TLV CEILING:  NONE

1333-86-4  CARBON BLACK  MG/M3
OSHA PEL-TWA:  3.5
OSHA PEL STEL:  NONE
OSHA PEL CEILING:  NONE
ACGIH TLV-TWA:  3.5
ACGIH TLV STEL:  NONE
ACGIH TLV CEILING:  NONE

14808-60-7  CRYSTALLINE SILICA  MG/M3
OSHA PEL-TWA:  10/(%SIO2+2) (RESPIRABLE)
OSHA PEL STEL:  NONE
OSHA PEL CEILING:  NONE
ACGIH TLV-TWA:  0.025 (RESPIRABLE)
ACGIH TLV STEL:  NONE
ACGIH TLV CEILING:  NONE

(Crystalline Silica and carbon black only present hazards as respirable particles of 10 microns or less. Both are bound in the coating and will not be released as respirable particles)

VENTILATION SYSTEM: A system of local and/or general exhaust is recommended to keep employee exposures below the airborne exposure limits. Local exhaust ventilation is generally preferred because it can control the emissions of the contaminant at its source, preventing dispersion of it into the general work area. Please refer to the ACGIH document, *Industrial Ventilation, A Manual of Recommended Practices*, most recent edition, for details.

PERSONAL RESPIRATORS (NIOSH APPROVED): If respirator use is desired, or if exposure limit values are exceeded, use NIOSH approved respirator and type A filters (brown, organic substances).

SKIN PROTECTION: Avoid prolonged skin contact. Chemical resistant (nitrile) gloves recommended for operations where skin contact is likely. Wear appropriate protective clothing or boots as needed. Workers should wash exposed skin several times daily with soap and water. Soiled work clothing should be laundered or dry-cleaned.

EYE PROTECTION: Safety glasses, chemical type goggles, or face shield recommended to prevent eye contact.

GENERAL HYGIENIC PRACTICES: Wash thoroughly with soap and water after handling, before eating, drinking, smoking, or using toilet facilities. Do not smoke during use.
9. PHYSICAL/CHEMICAL CHARACTERISTICS

**FORM:** Highly viscous liquid

**COLOR:** Black

**ODOR:** Slight mineral oil like odor

**BOILING POINT:** >390°F (>200°C)

**SOLUBILITY IN WATER:** Not soluble in water

**SPECIFIC GRAVITY:** .96 at 20°C (68°F) (Water =1)

**EVAPORATION RATE:** (BuAc=1): Not applicable

**POUR POINT (ASTM D97):** +30

**AUTOIGNITION TEMPERATURE:** >750°F (399°C)

**FLASH POINT:** 285°F (140°C) ASTM D93

**pH:** Not available

**PERCENT SOLIDS BY WEIGHT:** 98.9%

**VISCOSITY:** 500-650 Mpas - 73.4°F (23°C)

**VOLATILE ORGANIC COMPOUNDS (VOC):** 10.7 g/L using EPA Method 24

**COLD FREEZE POINT (ASTM D97):** +25

**FREEZING POINT (ASTM D1177):** This sample was too viscous to permit determination of its freeze point by ASTM 1177.

**VAPOR PRESSURE By Isoteniscope (ASTM D2879), torr:**

- 32°F .................. 0.28
- 68°F .................. 1.0
- 100°F .................. 2.7
- 150°F .................. 11
- 200°F .................. 34
- 250°F .................. 90
- 300°F .................. 160
- 350°F .................. 270
- 400°F .................. 426
- 450°F .................. 600
- 485°F .................. 760

10. STABILITY AND REACTIVITY

**STABILITY:** Stable under ordinary conditions (70°F (21°C) and 14.7 psig (760 mmHg)), of use and storage.

**CONDITIONS TO AVOID:** Combustible atmospheres. Heat, flames, ignition sources, water (absorbs readily) and incompatibles.

**POLYMERIZATION:** Not available.

**INCOMPATIBILITY WITH OTHER MATERIALS:** Do not store near other combustible materials.

**DECOMPOSITION:** Not available.

11. TOXICOLOGICAL INFORMATION

**EFFECTS OF EXPOSURE**

**ACUTE INHALATION:** LC50 not available

**EYES:** Irritant

**SKIN:** Irritant

**ACUTE INGESTION:** LD50 not available
CHRONIC EFFECTS/CARCINOGENICITY: Calcium carbonate, the product itself, is not listed by NTP, IARC, or OSHA as a carcinogen. There is no reported health effects associated with prolonged exposure to pure calcium carbonate. This product contains variable quantities of crystalline silica (quartz), which is considered a hazard by inhalation. IARC has classified crystalline silica as probably carcinogenic for humans (2A). This classification is based on the findings of laboratory animal studies that were considered to provide sufficient evidence and data from human epidemiological studies that were considered to provide limited evidence for carcinogenicity.

Crystalline silica is also a known cause of silicosis, a noncancerous lung disease. NTP and OSHA have not classified crystalline silica as a carcinogen.

Carbon black has been classified by IRAC as a Category 2B (known animal carcinogen, possible human carcinogen) material. This was based on the results of rat inhalation studies of carbon black, despite the lack of parallel evidence on humans or other animal species.

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

ECOTOXICITY: This product is not toxic or harmful to the environment.

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

MOBILITY: Highly viscous liquid is not water soluble and is not expected to be mobile.

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

WASTE DISPOSAL METHOD: It is the responsibility of the generator to determine at the time of disposal the proper classification and method of disposal. Disposal should be in accordance with applicable federal, state, and local regulations. Local regulations may be more stringent than regional or national requirements.

RCRA INFORMATION: If this material as supplied becomes a waste, it does not meet the criteria of a hazardous waste as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261.

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

CLASS: None
PRODUCT LABEL: Noxudol 300 S
UN NUMBER: None
PACKING GROUP: None
D.O.T. SHIPPING NAME: Consumer Commodity, ORM-D
PRODUCT RQ (LBS): None
ERG Guide Number: None
SUPPLEMENTAL HAZARD: None
VESSEL STOWAGE LOCATION: None
SHIPPING RESTRICTIONS: None
15. REGULATORY INFORMATION

U.S. FEDERAL REGULATORY STATUS

TSCA (TOXIC SUBSTANCE CONTROL ACT): All of the components of this product are listed on the TSCA inventory.

CERCLA (COMPREHENSIVE RESPONSE COMPENSATION, AND LIABILITY ACT): This product is NOT subject to CERCLA reporting requirements; however, many states have more stringent release reporting requirements. Report spills required under federal, state and local regulations.

SARA TITLE III (SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT): This product does not contain any chemicals subject to SARA Title III.

311/312 HAZARD CATEGORIES: Slight Health Hazard, Slight Flammability Hazard

CAA (CLEAN AIR ACT): This product conforms to the VOC limits listed under Subpart B: National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings under Section 183(e)(3)(C).

OTC (OZONE TRANSPORT COMMISSION): This product conforms to the VOC limits listed in Model Rule 2009 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations.

STATE REGULATIONS:

California Safe Drinking Water and Toxic Enforcement Act (Proposition 65): This product is known to contain chemicals currently listed as carcinogens or reproductive toxins as regulated under California Proposition 65.

California Air Resource Board (CARB) Suggested Control Measure for Automotive Coatings: This product conforms to the VOC limit for the automotive undercoating.

LOCAL REGULATIONS

SCAQMD (SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT) RULE 1151: This product conforms to the VOC limits listed under Rule 1151—Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, Appendix A.

BAAQMD (BAY AREA AIR QUALITY MANAGEMENT DISTRICT) RULE 8-45: This product conforms to the VOC limits listed under Rule 8-45—Motor Vehicle and Mobile Equipment Coating Operations.

INTERNATIONAL REGULATIONS:

Europe: All ingredients conform to the EU requirements.

Regulation (EC) nr. 1907/2006

EEC-directive 2006/121/2006

No label required

16. OTHER INFORMATION

Label Requirements: WARNING! COMBUSTABLE!

<table>
<thead>
<tr>
<th>Hazardous Material Information System (HMIS):</th>
<th>Health</th>
<th>Flammability</th>
<th>Reactivity</th>
<th>Personal Protection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>
National Fire Protection Association (NFPA):

NFPA Ratings: Health: 1, Flammability: 1, Reactivity: 0

NFPA/HMIS Definitions: 0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme
Protective Equipment: Goggles & shield; lab coat & apron; vent hood; proper gloves; class b extinguisher.

Prepared By: Donato Polignone (MSDS Authoring Services)  Part Number: --
Approved By: Soken Trade Corporation  Approval Date: April 18, 2011  Supersedes Date: March 1, 2011

ADDITIONAL INFORMATION:
The data in this Material Safety Data Sheet relates only to the specific material designated herein. It does not relate to use in combination with any other material or in any process. This Material Safety Data Sheet (MSDS) has been reviewed to fully comply with the guidance contained in the ANSI MSDS standard (ANSI Z400.1-2004)

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of Soken Trade Corporation. The data on this sheet are related only to the specific material designated herein. Soken Trade Corporation assumes no legal responsibility for use or reliance upon these data.

To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

END OF MSDS
In addition to the requirements identified in other Sections, your dealership must comply with any applicable state and local fire, building and zoning code requirements. This Section discusses how to comply with these requirements.

**Where Will You Conduct the B0D?**

**Same Space As Tacoma LSC 90D:** If you will conduct the Tundra B0D in the same space now being used for the Tacoma LSC 90D, then you should be able to rely on the approval already received for the LSC 90D from your local fire code enforcement official. Before beginning the Tundra B0D, you will need simply to notify your local fire code enforcement official, in writing, of your intention to use this same space to spray lower combustibility CRCs on Tundras, and then, you may proceed without any additional approval (unless this official contacts you and requests that you not proceed). You will find a model letter and attachments for providing this notification later in this Section. Please note that this model letter and attachments refer to “CRC program” instead of “B0D” to ensure that the notification to your local fire code enforcement official covers not only B0D but any CRC program that may be offered for Toyota vehicles in the future when conducted in the same space that you are now using for Tacoma LSC 90D.

**Different Space From Tacoma LSC 90D:** If you intend to conduct the B0D in a space different from the one now being used for the Tacoma LSC 90D, then you will need a new approval from your local fire code enforcement official. Please discontinue reading this Section and call the C.L.E.A.N. Dealer EH&S Hotline at 877-572-4347 to discuss your situation and also consult the Site Selection Section of this Dealer Package.

**Before** you begin applying CRC materials, you must do BOTH of the following:

1. **Notify the appropriate fire code enforcement official, in writing, of your intent to conduct the CRC program in the same space now being used for the Tacoma LSC 90D**

   In Appendix A you will find a model letter and attachments that you can use to notify your fire code enforcement official. You will need to add some descriptive information confirming that the space where you will conduct the CRC program is the same now being used for Tacoma LSC 90D.
These materials include a Determination of Compliance with the applicable fire codes prepared by Commercial Construction Consulting, Inc. ("C3") for TMS. To identify your appropriate official, go to Table 1 of this Section (starting at page 77). \textbf{If the office you received your Tacoma LSC 90D approval from is not listed in Table 1, please call the C.L.E.A.N. Dealer EH&S Hotline at 877-572-4347.}

\textbf{Important}: The Tundra B0D is designed to comply with state and local fire codes and with your previous approval to conduct the Tacoma LSC 90D. Therefore, you should be able to notify your fire code enforcement official about the CRC program and then proceed with the Campaign. It is possible, however, that your fire code enforcement official may request that you not proceed with the CRC program until the official can review your situation. If this occurs, please work with your official and do not proceed with the Tundra B0D until you have received his approval to do so. \textbf{If you face this situation and have questions or need assistance, go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) prior to conducting the CRC program.}

2. \textbf{Confirm that you can conduct the CRC program in compliance with applicable fire code, building, and zoning requirements.}

Locate your city/town/county on Table 1 (starting at page 77) to see whether it has any additional building, zoning, or other requirements applicable to the CRC program and contact your local officials as indicated.

\textbf{(Go to next page for summary of applicable State requirements.)}
I. SUMMARY OF APPLICABLE STATE REQUIREMENTS

A. Fire Code

1. The B0D does not require a state fire permit under the Ohio Fire Code\(^6\) (Fire Code) and Appendix A contains a Determination of Compliance that the B0D complies with the Fire Code so long as you conduct the B0D in the same location where you are conducting the Tacoma LSC 90D and you continue to follow the procedures outlined in this Fire, Building & Zoning Code Section and the Site Selection Section of the Dealer Packet. The Fire Code does require you to inform the appropriate fire code enforcement official (which in some locations may be the State Fire Marshal’s office) before commencing B0D operations at your dealership. See Table 1 (starting at pg. 77) for your dealership’s requirements and appropriate fire code enforcement official.

**Regulatory Note:** Your dealership is assumed to comply already with existing fire code requirements (e.g., sprinkler systems, ventilation, etc.) applicable to your dealership.

**IMPORTANT! – FIRE CODE INFORMATION**

You must continue to comply with items 2 and 3 below, and any additional requirements contained in Table 1 (starting at p. 77) or placed on your dealership as part of the approvals received for the Tacoma LSC 90D as part of your implementation of the B0D. **If you cannot meet all the requirements identified in items 2 or 3, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for additional assistance.**

2. You should be able to conduct the B0D consistent with state and local fire codes so long as you conduct the B0D in the same location as the LSC 90D and continue to satisfy all of the following requirements:

   a. Materials applied to the truck frame include only Class III liquids. (Note: Each of the CRC materials that you are being provided – interior and exterior – satisfies this requirement); and

   b. None of the following must be located within 20 feet of the B0D spray space: (i) open flames or spark-producing equipment, or (ii) drying, curing, or fusion apparatus; and

---

\(^6\) Ohio has adopted the 2006 edition of the International Fire Code (IFC). For those Ohio dealerships subject to an additional fire code or different version of the IFC (as identified in Table 1), conformance to the requirements outlined above should ensure compliance with your locally adopted fire code.

\(^7\) See Ohio Fire Code § 1.105.1 (2011).
c. Ventilation that provides at least six (6) air changes per hour in the B0D spray space; and

**How Do We Determine If this Ventilation Requirement Is Met?** If you conduct the B0D in the same spray space as the LSC 90D, then you already should satisfy this requirement based on the process that you went through prior to starting the LSC 90D with the two consultants retained by TMS, KPA and Commercial Construction Consulting, Inc. If you do not intend to conduct the B0D in the same spray space as the LSC 90D, then you will need a new approval from your local fire code enforcement official. As part of that approval process, you may wish to work with these same consultants retained by TMS to determine that your B0D work area satisfies this ventilation requirement. If you are facing this situation, please call the EH&S Hotline (877-572-4341) for assistance.

d. Your B0D spray space must be set up in a portion of your dealership (e.g., the service garage) that has adequate ventilation (see c above) and meets applicable size and other requirements (go to the Site Selection Section and Technical Instructions for additional information about how to select an appropriate B0D work area); and

**Remember: The dimensions of your partitioned BOD work area should be no smaller than 123 inches (10 1/4 feet) wide by 202 inches (17 feet) long.**

e. No material or solvent with a flash point less than 37.8˚C (100˚F) should be used as part of the B0D process. (Note: Each of the CRC materials that you are being provided – interior and exterior – satisfies this requirement); and

f. Fire extinguishers rated “B,” “AB,” or “ABC” must be provided within 30 feet of your dealership’s B0D spray space.

**Note:** Consistent with the Technical Instructions, the floor space of the area where the B0D will be conducted should be covered by an approved, noncombustible, nonsparking, fire retardant material.

**Technical Note:** If you have a question about whether your plans for conducting the B0D will satisfy any of these requirements, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).
3. Both CRC materials are considered Class IIIb combustible liquids\(^8\) and the amount of materials that you will use during the B0D should not trigger any new combustible liquid storage requirements for your dealership. However, as a best management practice, please store the CRC materials consistent with the guidelines below:

   a. **DO NOT** store more than 25 gallons of the CRC materials and any other regulated flammable or combustible materials in any one fire area; otherwise you may be subject to additional requirements; or

   b. If you store more than 25 gallons of regulated flammable or combustible liquid in any one fire area, then you must use a fire cabinet.

      (1) A single fire cabinet may hold up to 120 gallons.

      (2) Your dealership may only have up to three fire cabinets in each fire area, each of which may hold up to 120 gallons. If you store at these levels (3 x 120 gals = 360 gals) you should confirm with your appropriate fire code enforcement official that such storage at these levels does not require an operational permit in your locality.

B. **Building Code\(^9\)**

1. The B0D should not require a building permit under the Ohio State Building Code because adding the B0D would not “construct, enlarge, alter, repair, move, demolish, or change the occupancy of [your] building,” nor does it “erect, install, enlarge, alter, repair, remove, convert or replace any electrical, gas, mechanical or plumbing system.” (NOTE: Local codes **might** impose building permit requirements, as noted in the Table starting on page 77.\(^{10}\)

   **Regulatory Note:** It is assumed that your dealership:

   (i) complies already with building code requirements (for example, it is assumed that your dealership has a valid certificate of occupancy, meets the requirements for fire protection specified for repair garages and meets the mechanical ventilation requirements specified for repair garages); and

   (ii) does not require any building, electrical, gas, plumbing or mechanical system modifications for the B0D.

---

\(^8\) As defined by the Ohio Fire Code.


\(^{10}\) In particular, the application of the CRC materials being used for the B0D should not trigger any requirements for changes or modifications to the electrical wiring. These liquids are not flammable and are not expected to create a flammable vapor area, and any overspray will be controlled with temporary partitions.
II. SUMMARY OF APPLICABLE LOCAL REQUIREMENTS

Table 1 below identifies the local requirements applicable to the Tundra B0D (if any). It is organized by the city/local jurisdiction where your dealership is located. **IF THE LOCALITY WHERE YOU PLAN TO CONDUCT THE B0D IS NOT LISTED IN TABLE 1 (STARTING AT PAGE 77), PLEASE GO TO THE C.L.E.A.N. DEALER WEBSITE (http://cleandealer.com) OR CALL THE EH&S HOTLINE (877-572-4347).** The sections below briefly review these requirements.

**Regulatory Note – Regarding Conditional Use Permits:** If your dealership operates pursuant to a conditional use permit, special exception, or other special use permit, you must determine whether that permit prohibits the B0D process or considers it a “change in use” because, if so, then you may need a permit amendment. If you have any questions about zoning requirements, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

**Regulatory Note – Other Generally Applicable Local Laws and Regulations:** This Guide does not address other local laws and regulations that may apply generally to your dealership’s operations. Such laws and regulations may impose, among other requirements, general housekeeping and/or performance standards that require you to safeguard against improper release of materials that may pose health or environmental risks and to clean up (and report to appropriate authorities) any such improper release.

Unless noted in Table 1, your dealership is likely not subject to additional requirements under local zoning and building codes as a result of the B0D. However, should the need arise to discuss the B0D with your local authorities (in addition to the appropriate fire code enforcement official), the information assembled in Appendix A can be used for that purpose as well.
Table 1: Code Summary for Ohio Locations

Reminder: If the office you received your Tacoma LSC 90D approval from is not listed in this Table 1, please call the C.L.E.A.N. Dealer EH&S Hotline at 877-572-4347.

<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Type</th>
<th>Other Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ohio (State)</td>
<td>Note: Ohio State Fire Code = IFC Jurisdiction</td>
<td></td>
</tr>
<tr>
<td>Akron--</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Ganley Toyota</td>
<td>Anthony Law, District Chief Fire Prevention Bureau 146 S High St Akron, OH 44308 (330) 375-2411</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td>• Montrose Toyota</td>
<td><strong>IFC Jurisdiction</strong> Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td><strong>Contact</strong> John Moore Zoning Division Manager 166 S. High Street, Room 400 Akron, OH 44308-1628 (330) 375-2350</td>
</tr>
<tr>
<td>American Township (Lima)--</td>
<td>Thomas Hadding, Fire Chief American Township Fire Department 105 W. Main St. Elida, OH 45807 (419) 339-3921</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td>Allan Nott Toyota</td>
<td><strong>IFC Jurisdiction</strong> Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td><strong>Contact</strong> Brad Settlage Zoning Inspector for American Township 102 Pioneer Road Elida, Ohio 45807 419-331-8651</td>
</tr>
</tbody>
</table>

Please note that your jurisdiction also adopts the BOCA fire code; however, it is not expected that this will place any additional requirements on your Tundra B0D operations that are different from the IFC requirements identified above.
<table>
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<tr>
<th>Location</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Amherst--Premier Toyota of Amherst</strong></td>
<td>Wayne Norheim, Fire Chief Amherst Fire Department 414 Church St Amherst, OH 44001 (440) 988-4117</td>
<td>In the zoning district where your dealership is located, the CRC program cannot be conducted in the front portion of the building within 30 feet of the street on which the building fronts. <strong>Contact</strong> John Calvey Chief Building Official Building Department 480 Park Avenue Amherst, OH 44001 (440) 988-3734</td>
</tr>
<tr>
<td><strong>Anderson Township--Cincinnati Beechmont Toyota</strong></td>
<td>Craig Best, Assistant Chief Life Safety Division Fire Department Administration 7850 Five Mile Rd Anderson Township, OH 45230 (513) 688-8400 Stephanie A. Johnson, RA, LEED AP Plans Examiner Hamilton County Planning &amp; Development 138 East Court Street, Suite 803 Cincinnati, Ohio 45202</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Flood Plain Management Overlay District and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. <strong>Contact</strong> Barb Heffner Zoning Inspector Anderson Center 7850 Five Mile Road, Anderson Township, Ohio 45230 513-688-8400</td>
</tr>
<tr>
<td>Location</td>
<td>Local Fire Code Official and Fire Code Type</td>
<td>Other Local Requirements</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Athens--Don Wood Toyota</td>
<td>Robert Troxel, Chief Athens Fire Department 61 Columbus Road, Athens, OH 45701 (740) 592-3302</td>
<td>You should verify whether or not the location where you will conduct the CRC program is located within a Wellhead Protection Area, a Wellhead Protection Zone, or a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in <strong>Appendix A</strong>.</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Paul Logue</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Zoning</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Department of Development, Enforcement &amp; Facilities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>City of Athens, Ohio 45701</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(740) 592-3338</td>
</tr>
<tr>
<td>Beavercreek Township--Voss Toyota</td>
<td>David VandenBos, Chief Beavercreek Township Fire Prevention Bureau 851-A Orchard Lane Beavercreek, Ohio 45434 (937) 426-1213</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Beavercreek Township Zoning Department Office 1981 Dayton Xenia Road Beavercreek, Ohio 45434 USA (937) 306-0065 <a href="mailto:zoning@beavercreektownship.org">zoning@beavercreektownship.org</a></td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in <strong>Appendix A</strong>.</td>
<td>Contact</td>
</tr>
</tbody>
</table>

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12 Please note that your jurisdiction also adopts the BOCA fire code; however, it is not expected that this will place any additional requirements on your Tundra B0D operations that are different from the IFC requirements identified above.
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<tr>
<th>Location</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Bedford--Toyota of Bedford</td>
<td>Shawn Solar, Assistant Fire Chief</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td>Bedford Fire Prevention Bureau</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td>165 Center Road</td>
<td>James McReynolds</td>
</tr>
<tr>
<td></td>
<td>Bedford, OH 44146</td>
<td>Inspector</td>
</tr>
<tr>
<td></td>
<td>(440) 232-1214</td>
<td>City of Bedford Building Department</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>Bedford Building Department 165 Center Road</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bedford, Ohio 44146</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(440) 735-6530</td>
</tr>
<tr>
<td>Boardman--Toyota of Boardman</td>
<td>Lt. James McCreary</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td>Fire Prevention Bureau</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td>Boardman Fire Department</td>
<td>Stephanie M. Landers</td>
</tr>
<tr>
<td></td>
<td>136 Boardman-Poland Rd.</td>
<td>Administrative Assistant</td>
</tr>
<tr>
<td></td>
<td>Boardman, OH 44512</td>
<td>Zoning Administration</td>
</tr>
<tr>
<td></td>
<td>(330) 729-9535</td>
<td>8299 Market Street</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>Boardman, Ohio 44512</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(330) 726-4181</td>
</tr>
<tr>
<td>Bowling Green--Thayer</td>
<td>Steve Meredith, Chief</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td>Chevrolet-Toyota</td>
<td>City of Bowling Green Fire Division</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td>552 East Court St</td>
<td>Heather Sayler</td>
</tr>
<tr>
<td></td>
<td>Bowling Green, OH 43402</td>
<td>Planning Director</td>
</tr>
<tr>
<td></td>
<td>(419) 352-3106</td>
<td>Administrative Services Building</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>304 N. Church Street</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bowling Green, OH 43402</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(2nd Floor)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Telephone: 419-354-6218</td>
</tr>
</tbody>
</table>

Please note that your jurisdiction also adopts the BOCA fire code; however, it is not expected that this will place any additional requirements on your Tundra B0D operations that are different from the IFC requirements identified above.
<table>
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<tr>
<th>Location</th>
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</tr>
</thead>
</table>
| Brunswick--Brunswick Toyota | Jim Baird, Fire Chief  
4095 Center Rd.  
Brunswick OH 44212  
(330) 273-8046  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Roger Westfall  
Development Director  
The City of Brunswick  
4095 Center Rd.  
Brunswick, OH 44212  
(330) 558-6865 [mailto:westfall@brunswick.oh.us](mailto:westfall@brunswick.oh.us) |
| Brook Park--Metro Toyota   | Mark Ramach, Fire Chief  
Bureau of Fire Prevention  
17401 Holland Road  
Brook Park, OH 44142  
(216) 433-1215  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
John Hurst, Acting Commissioner  
Building Department  
6161 Engle Road  
Brook Park, OH 44142  
216-433-7412 |
| Chillicothe--Nourse Toyota | Bruce Vaughan, Chief  
Chillicothe Fire Department  
54 E. Water Street  
Chillicothe, OH 45601  
(740) 773-2212  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | The Fire Department may also require you to submit a copy of the materials in Appendix A to the Building Department. If so, here is the appropriate contact information:  
You should verify whether or not the location where you will conduct the CRC program is within a Flood Plain Overlay District and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
Kelly Kight, Chief Building Official  
Building Department  
35 South Paint St.  
Chillicothe, OH 45601  
(740) 773-8980 |
<table>
<thead>
<tr>
<th>Location</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Cincinnati</td>
<td>KINGS TOYOTA – GO TO DEERFIELD TOWNSHIP</td>
<td>Based on a jurisdiction review, Kings Toyota is located outside of the Cincinnati city limits in Deerfield Township.</td>
</tr>
<tr>
<td></td>
<td>TOYOTA OF CINCINNATI – GO TO COLERAIN TOWNSHIP</td>
<td>Based on a jurisdiction review, Toyota of Cincinnati is located outside of the Cincinnati city limits in Colerain Township.</td>
</tr>
<tr>
<td></td>
<td>BEECHMONT TOYOTA – GO TO ANDERSON TOWNSHIP</td>
<td>Based on a jurisdiction review, Beechmont Toyota is located outside of the Cincinnati city limits in Anderson Township.</td>
</tr>
<tr>
<td>Cleveland--Metro Toyota</td>
<td>GO TO BROOK PARK</td>
<td>Based on a jurisdiction review, Metro Toyota is located outside of the Cleveland city limits in Brook Park.</td>
</tr>
<tr>
<td>Cleveland Heights-- Motor Cars Toyota</td>
<td>Kevin C. Mohr, Chief Cleveland Heights Division of Fire 40 Severance Circle Cleveland Heights, OH 44118 (216) 291-2673</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Flood Plain Overlay District and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. Contact Kim Steigerwald Assistant Director Planning and Zoning 40 Severance Circle Cleveland Heights, OH 44118 (216) 291-4857</td>
</tr>
</tbody>
</table>

IMPORTANT – PLEASE READ
<table>
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<th>Location</th>
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<tbody>
<tr>
<td>Colerain Township--Toyota of Cincinnati</td>
<td>Jim Bowman, Fire Inspector&lt;br&gt;Colerain Twp Fire Inspections&lt;br&gt;4200 Springdale Rd&lt;br&gt;Cincinnati, OH 45251&lt;br&gt;(513) 245-6505&lt;br&gt;Stephanie A. Johnson, RA, LEED AP&lt;br&gt;Plans Examiner&lt;br&gt;Hamilton County Planning &amp; Development&lt;br&gt;138 East Court Street, Suite 803&lt;br&gt;Cincinnati, Ohio 45202</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. Contact Susan H. Roschke, Ph.D. Planning and Zoning Administrator&lt;br&gt;4200 Springdale Rd.&lt;br&gt;Colerain Township, Ohio 45251&lt;br&gt;(513) 385-7505</td>
</tr>
<tr>
<td>Columbus--&lt;br&gt;• German Toyota of Columbus&lt;br&gt;• Tansky Sawmill Toyota&lt;br&gt;• Toyota Direct&lt;br&gt;• Toyota West</td>
<td>Karry L. Ellis, Assistant Chief Fire Prevention Bureau&lt;br&gt;Columbus Division of Fire&lt;br&gt;3675 Parsons Ave, Columbus, OH 43207&lt;br&gt;(614) 645-8673</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Wellfield Protection Area or Special Flood Hazard Area and comply with any additional requirements that may apply. Contact Vince Papsidero Administrator, Planning Division&lt;br&gt;109 N. Front Street&lt;br&gt;Columbus, Ohio 43215&lt;br&gt;(614) 645-8664</td>
</tr>
</tbody>
</table>

14 Please note that your jurisdiction also adopts the BOCA fire code; however, it is not expected that this will place any additional requirements on your Tundra B0D operations that are different from the IFC requirements identified above.
<table>
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<tr>
<th>Location</th>
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</tr>
</thead>
</table>
| Deerfield Township--Kings Toyota | Doug Wehmeyer, Battalion Chief Fire Prevention  
Deerfield Twp Fire Department  
8355 Snider Road  
Mason, OH 45040  
(513) 459-0875  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Lois McKnight  
Community Development Director  
4900 Parkway Drive, Suite 150  
Mason, OH 45040  
513-701-6958 |
| Delaware--Byers Toyota          | John L. Donahue, Chief Fire Prevention  
Delaware Fire Department  
99 South Liberty  
Delaware, OH 43015  
(740) 203-1300  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Jerry Warner  
Planning and Community Development Department  
One South Sandusky St.  
Delaware, Ohio 43015  
(740) 203-1600 |
<p>| Dublin--Tansky Sawmill Toyota   | <strong>GO TO COLUMBUS</strong>                          | Based on a jurisdiction review, Tansky Sawmill Toyota is located outside of the Dublin city limits in Columbus. |</p>
<table>
<thead>
<tr>
<th>Location</th>
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<th>Other Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fairfield--Performance Toyota</td>
<td>Dennis Glenn, Deputy Chief Fairfield Fire Prevention Bureau 375 Nilles Rd Fairfield, OH 45014 (513) 867-5378</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Wellhead Protection Area or Special Flood Hazard Area and comply with any additional requirements that may apply.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td>Falls Township--Tansky Toyota</td>
<td>Lt. Brady Johnson, Chief Inspector Fire Prevention Bureau Falls Twp Volunteer Fire Department P.O. Box 2215 Zanesville, OH 43702 (740) 453-1942</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Timothy Bachman Director, Development Services Department</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5350 Pleasant Ave. Fairfield, Ohio 45014</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(513) 867-5345</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contact</td>
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<tr>
<td></td>
<td></td>
<td>Ron Ball Falls Township Zoning Inspector</td>
</tr>
<tr>
<td></td>
<td></td>
<td>740-452-5631</td>
</tr>
<tr>
<td>Location</td>
<td>Local Fire Code Official and Fire Code Type</td>
<td>Other Local Requirements</td>
</tr>
<tr>
<td>---------------------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Findlay--La Riche Toyota</td>
<td>James Holmes Fire Prevention Bureau Findlay Fire Department 720 South Main St 45840</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. Contact Todd Richard Zoning Inspector, Zoning Office 318 Dorney Plaza, Room 306 Findlay, Ohio 45840 (419) 424-7108</td>
</tr>
<tr>
<td>Jefferson--Nassief Toyota</td>
<td>John Waymen, Chief Jefferson Fire Department 98 E. Jefferson St., Jefferson, OH 44047</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. Contact Ralph Rice Jefferson Township Zoning Inspector 440-576-7701</td>
</tr>
<tr>
<td>Kent--Don Joseph Toyota</td>
<td>James A. Williams, Chief Kent Fire Department 320 S. Depeyster St. Kent, OH 44240</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. Contact Kim Brown, Code Inspector Building Department 930 Overholt Road Kent, OH 44240 (330) 678-8107</td>
</tr>
</tbody>
</table>

15 Please note that your jurisdiction also adopts the BOCA fire code and Uniform Fire Code; however, it is not expected that these codes will place any additional requirements on the Tundra B0D that are different from the IFC requirements identified above.
<table>
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<tr>
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<tbody>
<tr>
<td>Lancaster--River Valley Toyota</td>
<td>Steve C. Sells, Chief Lancaster Fire Department 1596 East Main St Lancaster, OH 43130 (740) 687-6640</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Building &amp; Zoning Department 121 E Chestnut St, Suite 102 Lancaster OH 43130 (740) 687-6649</td>
</tr>
<tr>
<td>Lima--Allan Nott Toyota</td>
<td>GO TO AMERICAN TOWNSHIP</td>
<td>Based on a jurisdiction review, Allan Nott Toyota is located outside of the Lima city limits in American Township.</td>
</tr>
<tr>
<td>Logan--Toyota of Logan</td>
<td>Brian Robertson, Chief Logan Fire Department 155 East Main Street Logan, OH 43138 (740) 385-2307</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong>¹⁶ - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>City of Logan Zoning Office 18 W Jennison Ave Logan, Ohio 43138 (740) 385-5369</td>
</tr>
</tbody>
</table>

¹⁶ Please note that your jurisdiction also adopts the BOCA fire code; however, it is not expected that this will place any additional requirements on your Tundra B0D operations that are different from the IFC requirements identified above.
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<th>Location</th>
<th>Local Fire Code Official and Fire Code Type</th>
<th>Other Local Requirements</th>
</tr>
</thead>
</table>
| Mansfield--Graham Toyota| Amy Mc Elvain, Captain Fire Prevention Bureau  
Mansfield Fire Department  
140 East Third Street,  
Mansfield, OH 44902  
(419) 755-9816  
Linda Price, Manager  
Building & Codes Department  
30 N. Diamond Street  
Mansfield, Ohio 44902  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A. | All CRC program operations must be conducted within an enclosed building.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Cindy Baker  
Manager, Community Development  
30 N. Diamond Street  
Mansfield, Ohio 44902  
(419) 755-9795 |
| Marietta--C&C Dodge-Toyota | Richard Stewart  
Fire Prevention Bureau  
Marietta Fire Department  
301 Putnam Street  
Marietta, OH 45750  
(740) 376-6443  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A. | You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Mike Stocky  
Development Administrator  
304 Putnam Street  
Marietta, OH 45750  
(740) 373-9354 |
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Type</th>
<th>Other Local Requirements</th>
</tr>
</thead>
</table>
| Marion--McDaniel Toyota | Chief Ralph Zwolle  
Marion City Fire Department  
186 South Prospect Street  
Marion, Ohio 43302  
740-382-0040  
Geoffrey D. Eaton, CBO  
Asst. Chief Building Official  
State of Ohio  
Division of Industrial Compliance  
6606 Tussing Road - P.O. Box 4009  
Reynoldsburg, OH 43068-9009  
(614) 728-0052  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Judy Rawlins  
233 West Center Street  
3rd Floor  
Marion, Ohio 43302  
740-383-4114 |
| Maumee--Rouen Toyota | Brandon Loboschefski, Bureau Chief  
Fire Prevention Bureau  
Fire Station #2  
450 W. Dussel Drive  
Maumee, OH 43537  
(419) 897-7051  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a floodplain and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Bruce Wholf  
Chief Building Officer, Building & Zoning  
400 Conant Street  
Maumee, OH 43537  
(419) 897-7075 |
<table>
<thead>
<tr>
<th>Location</th>
<th>Official and Fire Code Type</th>
<th>Other Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Median Township--Brunswick Toyota</td>
<td>Mark Crumley, Chief Medina Township Fire Department 3803 Huffman Road Medina, OH 44256 330-723-6900</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in <strong>Appendix A</strong>.</td>
<td>Contact</td>
</tr>
<tr>
<td>Mentor--Classic Toyota</td>
<td>Robert Searles, Deputy Chief Mentor Fire Department Fire Prevention Bureau 8467 Civic Center Blvd Mentor, OH 44060 (440) 974-5768</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td></td>
<td><strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in <strong>Appendix A</strong>.</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Engineering &amp; Building 8500 Civic Center Boulevard Mentor, Ohio 44060 (440) 974-5785</td>
</tr>
<tr>
<td>Miamisburg--Walker Toyota</td>
<td><strong>GO TO MONTGOMERY COUNTY</strong></td>
<td>Based on a jurisdiction review, the Walker Toyota dealership is located outside of the Miamisburg city limits in Montgomery County.</td>
</tr>
</tbody>
</table>

**IMPORTANT – PLEASE READ**

Based on a jurisdiction review, the Walker Toyota dealership is located outside of the Miamisburg city limits in Montgomery County.
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Type</th>
<th>Other Local Requirements</th>
</tr>
</thead>
</table>
| Montgomery County--Walker Toyota | Robert A. Spencer  
Fire Marshal  
Miamisburg Fire Department - Headquarters  
2135 E. Central Avenue  
Miamisburg, OH 45342  
(937) 847-6663  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a 100-year floodplain and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Maury Wyckoff, Chief Building Official  
Montgomery County Building Regulations Division  
451 West Third St.  
Dayton, OH 45422  
(937) 225-4586 |
| New Philadelphia--Ferris Toyota   | Jim Parrish, Chief  
New Philadelphia Fire Department  
108 Second St, SE  
New Philadelphia, OH 44663  
(330) 343-4431 x 250  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
James Zucal  
Service Director, Services Department  
1234 Commercial Avenue SE  
New Philadelphia, Ohio 44663  
(330) 308-5752 |
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Type</th>
<th>Other Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Newark--Coughlin Toyota</td>
<td>Jack Stickradt, Jr., Chief Newark Division of Fire &amp; EMS 1140 Hollander St, Newark, OH 43055 (740) 349-6753</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td>North Canton (site in Jackson)--Cain Toyota</td>
<td>GO TO JACKSON TOWNSHIP</td>
<td>Based on a jurisdiction review, Cain Toyota is located outside of the North Canton city limits in Jackson Township.</td>
</tr>
<tr>
<td>North Olmsted--Sunnyside Toyota</td>
<td>Thomas R. Klecan, Fire Chief North Olmsted Fire Department, 24291 Lorain Rd, North Olmsted, OH 44070 (440) 777-1214</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
</tbody>
</table>

17 Please note that your jurisdiction also adopts the BOCA fire code and National Fire Codes; however, it is not expected that these codes will place any additional requirements on the Tundra B0D that are different from the IFC requirements identified above.
<table>
<thead>
<tr>
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<tr>
<td>Perkins Township-Kasper Toyota</td>
<td>Keith Eastman, Fire Marshal Perkins Township Fire Department 3003 Campbell St, Sandusky, OH 44870 (419) 626-1334 <strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. <strong>Contact</strong> Zoning Inspector Perkins Township Hall 1210 E. Bogart Road Sandusky, OH 44870 419-609-1435 or 419-265-4595</td>
</tr>
<tr>
<td>Portsmouth--Glockner Toyota</td>
<td>Pete Gemperline, Chief Rosemount Fire Department 1129 Orm Ave. Portsmouth, OH 45662 (740) 353-8510 <strong>IFC Jurisdiction</strong> - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. <strong>Contact</strong> Daniel Saez, Director Community Development 2010 Charles Street Portsmouth, Ohio 45662 (740) 354-5673</td>
</tr>
<tr>
<td>Sandusky (Site in Perkins Township)--Kasper Toyota</td>
<td>GO TO PERKINS TOWNSHIP</td>
<td>Based on a jurisdiction review, Kasper Toyota is located outside of the Sandusky city limits in Perkins Township.</td>
</tr>
<tr>
<td>Location</td>
<td>Local Fire Code Official and Fire Code Type</td>
<td>Other Local Requirements</td>
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</table>
| Springfield--Jeff Wyler Toyota | Nick Heimlich, Fire Marshal  
City of Springfield Fire Rescue Division  
350 North Fountain Ave, Springfield, OH 45504  
(937) 324-7610  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Heather Whitmore, Administrator  
Planning & Zoning  
76 East High Street  
Springfield, OH 45502  
(937) 324-7372 |
| Steubenville--Team Toyota | Terri English, Chief  
Steubenville Fire Department  
308 Market Street,  
Steubenville, OH 43952  
(740) 283-6000 x 1800  
**IFC Jurisdiction** – Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
Christopher Petrossi, Urban Project Director  
Steubenville Planning and Development Office  
308 Market Street, Room 205  
Steubenville, OH 43952  
(740) 283-6000 Ext. 1700 |
<table>
<thead>
<tr>
<th>Location</th>
<th>Contact</th>
<th>Other Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Toledo--Jim White Toyota</td>
<td>John Lee, Deputy Chief</td>
<td>Based on a jurisdiction review, Jim White Toyota is located outside of the Toledo city limits in Sylvania Township. You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area or Wellhead Protection Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. Contact Tim DeWitt, Zoning Department, 4927 Hollan-Sylvania Rd., Sylvania, OH 43560, (419) 882-7676.</td>
</tr>
<tr>
<td>Sylvania Township--Jim White Toyota</td>
<td>Chad E. Follick, Fire Chief Vandalia Fire Division</td>
<td>You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. Contact Engineering &amp; Inspection, 333 J.E. Bohanan Drive, Vandalia, OH 45377, (937) 898-3750.</td>
</tr>
<tr>
<td>Location</td>
<td>Local Fire Code Official and Fire Code Type</td>
<td>Other Local Requirements</td>
</tr>
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<td>-----------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Warren--Toyota of Warren                | Kenneth Nussle, Fire Chief  
111 South Street SE, Warren, OH 44483  
(330) 841-2542  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply.  
**Contact**  
Mr. Michael Keys, Director  
Community Development  
418 Main Avenue SW  
Warren, Ohio 44481  
(330) 841-2595 |
| Washington Court House–Gusweiler Toyota | Daniel E. Fowler, Fire Chief  
136 N Fayette St, Washington Cts, OH 43160  
(740) 636-2360  
**IFC Jurisdiction** - Adopts the State Fire Code. Materials to contact local fire official are found in **Appendix A**. | You should confirm that the location where you will conduct the CRC program is not located in a Special Flood Hazard Area; otherwise additional requirements may apply.  
You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit.  
**Contact**  
City Of Washington Court House  
Building/Zoning Department  
105 N. Main St.  
Washington C.H., OH 43160  
(740) 636-2353 |

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18 Please note that your jurisdiction also adopts the NFPA 1-Uniform Fire Code; however, it is not expected that this will place any additional requirements on your ability to conduct the Tundra B0D.
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Type</th>
<th>Other Local Requirements</th>
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</thead>
<tbody>
<tr>
<td>Wooster--Performance Toyota</td>
<td>Frank Kuntz, Assistant Fire Chief Fire Prevention Bureau 510 N. Market St. Wooster, OH 44691 (330) 263-5266</td>
<td>You should verify whether or not the location where you will conduct the CRC program is within a Special Flood Hazard Area and comply with any additional requirements that may apply. You should verify that the CRC program will not constitute a change in use or impermissible use under your zoning permit. <strong>Contact</strong> Val Jesionek Planning / Zoning Manager, Planning &amp; Zoning Division 538 N. Market St. Wooster, Ohio 44691 (330) 263-5238</td>
</tr>
<tr>
<td>Zanesville--Tansky Toyota</td>
<td>GO TO FALLS TOWNSHIP</td>
<td>Based on a jurisdiction review, the Tansky Toyota is located outside the Zanesville city limits in Falls Township.</td>
</tr>
</tbody>
</table>
APPENDIX A

Materials to Demonstrate Compliance with the Ohio Fire Code and Local Fire Code Requirements

Compliance Information

&

Materials to submit to the Appropriate Fire Code Enforcement Official

• Model Letter
• C3 Determination of Compliance with the Ohio Fire Code and Attached Representative Process Description and MSDSs
• Dealer Information Sheet

(Electronic copies or available on the C.L.E.A.N. Dealer website - http://cleandealer.com)
Appendix A1: Ohio Jurisdictions - Summary of Fire Code Requirements

Your local jurisdiction is subject to the Ohio Fire Code (based on the 2006 IFC) or a locally adopted version of that code.

- **Before you begin conducting the B0D**, you will need to provide your local fire code enforcement official with information about this CRC program and your intent to conduct it in the same space where you are/were conducting the Tacoma LSC 90D. Under the Ohio Fire Code and locally adopted fire codes, the appropriate fire code enforcement official has the authority to require plans and specifications to ensure compliance with applicable codes and standards, and may require an operating permit for these spraying operations.

- **To assist you with contacting your appropriate fire code enforcement official**, Appendix A2 contains (1) a model letter, (2) a Determination of Compliance from Commercial Construction Consulting Inc. (“C3”) which includes a representative process description and MSDSs, (3) a background information sheet that you must complete that will provide your appropriate fire code enforcement official with relevant dealer-specific information about where the operation will take place. *(Note: Electronic copies of these materials can be found on the C.L.E.A.N. Dealer website - [http://cleandealer.com](http://cleandealer.com).*

- **You should do the following:**
  
  - Address the model letter to the appropriate fire code enforcement official and put it on your dealership’s letterhead. *(See Table 1 beginning at page 77.)*
  
  - Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
    
    - Service area where the CRC program will be conducted *(Note: this should be the same location where you are/were conducting the Tacoma LSC 90D);*
    
    - Storage area to be used for CRC materials; and
    
    - Ventilation system in the area where the CRC program will be conducted.
  
  - **Remember - Enclose the following with the cover letter to the appropriate fire code enforcement official:**
    
    - The Determination of Compliance letter prepared by C3, which includes a representative process description and MSDSs
• The **completed dealership information sheet** from Appendix A2.

  o Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.

  o You may wish to call your local fire code official before submitting the letter and attachments to let them know you will be making the submission.

**IMPORTANT:** To avoid confusion, make sure to send the letter and attachments to ensure that the fire official has more than a verbal description of the CRC program.
APPENDIX A2: Model Letter, Determination of Compliance with the Ohio Fire Code and Attached Representative Process Description and MSDSs

*Electronic Copy of Letter and Attachments are available on the on the C.L.E.A.N. Dealer website - [http://cleandealer.com](http://cleandealer.com).*
Re: NOTIFICATION OF INTENT TO CONDUCT CORROSION-RESISTANT COMPOUND CAMPAIGN IN THE APPROVED SPRAYING AREA OF [LOCAL DEALERSHIP]

Dear [Name]:

Our dealership previously obtained your office’s approval to conduct a Limited Service Campaign (“LSC”) for Tacoma vehicles at our facility located at [insert address]. As you may recall, the Tacoma LSC involves the application of a Class IIIB corrosion-resistant compound (“CRC”) to the interior of the vehicle’s frame rails and a Class II CRC material to the exterior of the vehicle’s frame rails.

We contacted you earlier this year to inform you that we would be continuing to offer the Tacoma LSC at our dealership through the end of 2011. In that letter we indicated that Toyota had announced its intention to offer a separate CRC program to owners of certain Toyota vehicles and that we would provide details when available. We are writing to provide you with the details of this separate CRC program.

The CRC program will be conducted in the same area within our facility already approved by your office for the Tacoma LSC. Initially, it will address certain model year Tundra vehicles subject to a voluntary safety recall, but we anticipate that the CRC program will extend to certain other Toyota vehicles as well.

The principal difference with the new CRC program is that Toyota has transitioned to a less combustible, Class IIIB material known as Noxudol 300 S, for application to the exterior of the frame. Noxudol 300 S has a much higher flash point (285°F) as compared to the material being used for the Tacoma LSC 90D (X128T, which has a flash point of 105°F). (Noxudol 300 S also has the added advantage, from an environmental perspective, of being much lower in volatile organic compounds (VOCs) than the X128T material.) The new CRC program will continue to use either the same 712AM material or a similar Class IIIB liquid, to treat the interior of the frame.

Thus, the CRC program will involve application of only Class IIIB combustible liquids. Moreover, as a result of Toyota’s transition to a less combustible Class IIIB liquid for this CRC program, our dealership will discontinue applying the Class II combustible liquid to Toyota vehicles once the Tacoma LSC ends on December 31, 2011.

We intend to begin offering the CRC program at our dealership [Insert Date at least 10 days from now], unless we hear from you otherwise. For your information, we are attaching site-specific information which confirms that the location where we will conduct this CRC program is the same location you have already approved for undercoating operations. We also are attaching a Determination of Compliance prepared by Toyota’s fire code expert, Commercial Construction Consulting, Inc. (“C³”), finding that the CRC program as designed conforms to the Ohio Fire Code. This Determination of Compliance includes as attachments the Material Safety Data Sheets for the CRC materials and a representative process description. We believe this information demonstrates that the CRC program will be conducted in accordance with all
applicable laws, regulations, and other codes and complies with your previous approval of these operations at our dealership.

If you have any questions or require any additional information, please do not hesitate to contact [Dealership] or [Number]. Thank you for your time and consideration.

Sincerely,

Attachments:
- C³ Determination of Compliance with attached Representative Process Overview and CRC Material MSDSs
- Dealership Information Sheet
ATTACHMENT 1: DETERMINATION OF COMPLIANCE FROM COMMERCIAL CONSTRUCTION CONSULTING, INC., WITH ATTACHED REPRESENTATIVE PROCESS DESCRIPTION AND MSDSs
August 26, 2011

Toyota Motor Sales, U.S.A., Inc.
19001 South Western Avenue, HQ 11
Torrance, CA 90501

Re: Toyota Corrosion-Resistant Compound ("CRC") Application Program
Compliance with the Ohio State Fire Code

Thank you for engaging Commercial Construction Consulting, Inc. ("C3") to determine compliance with applicable Ohio fire code regulations in advance of Toyota Motor Sales’ implementation of a program involving the application of two corrosion-resistant compounds (the “CRC” program) to the frames on the underside of certain Toyota vehicles.

This analysis is intended for use in those local Ohio jurisdictions that have adopted a version of the International Fire Code (IFC) as published by the International Code Council (ICC). This analysis is based on the 2006 version of the IFC, which has been adopted in part as the state fire code in the State of Ohio.

We understand that the CRC program is substantially similar to the Tacoma Limited Service Campaign 90D (LSC 90D) that Toyota’s Ohio dealers have been conducting in a previously approved spray area, with one important distinction – whereas the LSC 90D involves spray application of both a Class II and a Class IIIB combustible liquid to the underside of certain Toyota vehicles, the new CRC program will use the same (or a similar) Class IIIB combustible liquid for application to the interior of the frame, but will substitute a less combustible, Class IIIB liquid for the Class II liquid for application to the exterior of the frame. Thus, the new CRC program uses only Class IIIB combustible liquids. We further understand that the LSC 90D will conclude after December 31, 2011, and therefore, that Ohio dealers will no longer be applying the Class II CRC to Toyota vehicles after that date.

As discussed below, we have determined that the CRC program will be in compliance with the applicable provisions of the 2006 IFC. We have further determined that as long as the CRC program is conducted in the spray area previously approved for the LSC 90D, and in accordance with operational requirements1 of the IFC’s vehicle undercoating exemption, then the CRC program qualifies for the exemption in Section 1504.2 and further approval should not be required.

To supplement the discussion below and for your reference, this letter attaches the following documents:
(1) a CRC program representative process description; and (2) the Material Safety Data Sheets (MSDSs) for each of the two CRC materials.

1 Dealers participating in the LSC 90D were instructed to conduct the LSC 90D in a spray area that achieves a minimum ventilation rate of six air changes per hour. Pursuant to a letter from Interim State Fire Marshal Donald C. Cooper in February 2010, with six air changes per hour, the State Fire Marshal’s office indicated that initial concerns related to the possible creation of a flammable vapor area were dispelled. We recommend that dealers participating in the CRC program continue to conduct the program in spray area that achieves a minimum ventilation rate of six air changes per hour.
Regulatory Analysis

2006 International Fire Code

Section 1504.2 of the 2006 IFC lists the locations in buildings where spray finishing operations may be conducted. The “Exception” notes that spraying operations using Class III combustible liquids are exempt from the provisions of Section 1504 when adequate ventilation is provided and where otherwise approved by the local fire official:

Regulation: Section 1504.2 (Location of spray-finishing operations): Spray finishing operations conducted in buildings used for Group A, E, I or R occupancies shall be located in a spray room protected with an approved automatic sprinkler system installed in accordance with standard 903.3.1.1 and separated vertically and horizontally from other areas in accordance with the International Building Code. In other occupancies, spray-finishing operations shall be conducted in a spray room, spray booth, or spraying space approved for such use.

Exception: Automobile undercoating operations and spray-on automotive lining operations conducted in areas with approved natural or mechanical ventilation shall be exempt from the provisions of Section 1504 when approved and where utilizing Class IIIA or Class IIIB combustible liquids.

Analysis: The CRC program meets the requirements of the Exception in Section 1504.2 and therefore qualifies for the undercoating exemption in the IFC: 1) Both materials to be used are Class IIIB combustible liquids; 2) Dealers are expected to apply the materials in the same spray area that already has been approved for a similar corrosion-resistant compound program known as the “LSC 90D”; and 3) Dealers also must maintain adequate ventilation in this approved spray area and otherwise conduct the CRC program in a manner that meets operational requirements of the IFC’s vehicle undercoating exemption.

Dealers should be able to conduct the CRC program in the same approved spray area where they conducted the LSC 90D without seeking further approval. Nonetheless, we recommend that dealers notify their local fire official of their intent to conduct the CRC program in this already-approved spray area and provide the official with the MSDSs for the Class IIIB combustible liquids that will be used in the CRC program.

If a dealer chooses to conduct the CRC program in a different service bay from the one previously approved, then the operations at the new bay must comply with the requirements under IFC Section 1504. We recommend that the dealer obtain approval from the local fire official to conduct the CRC program in the new spray area.

If you have any questions, please do not hesitate to call.

Very truly yours,

Doug Anderson
Manager, Code Advisory Group

Attachments
**TUNDRA B0D PROCESS OVERVIEW**

**Step 1: Initial Work Area Setup.** Locate dedicated work area in dealership’s garage that has a vehicle lift, is well ventilated and can be sectioned off with temporary partitions. No physical alteration of the workspace or installation of new equipment is required for the B0D. The work area previously used for the Tacoma 90D LSC should be used if it is large enough to accommodate the Tundra.

**Step 2: Vehicle Preparation.** Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

- **Remove truck bed assembly.**
- **Clean frame, if necessary.** It may be necessary to clean the frame, including pressure washing. **No** chemicals or solvents will be used to clean the frame.
- **Place vehicle on lift.** Raise the vehicle using the vehicle lift; remove certain vehicle components (e.g., tires and wheels, spare tire, engine under cover).
- **Work area setup.** Place tarp beneath vehicle and set up temporary partitions around vehicle. Tarps are intended to capture limited overspray and to facilitate clean-up.
- **Prepare frame.** Manually remove rust from frame using scraper, wire brush, and/or compressed air.
- **Mask parts.** Mask areas not to be sprayed (e.g., drive shaft, brake/hub assemblies, exhaust).
- **Attach Plastic Sheet:** To capture any 712AM that may drip through small holes in the frame, use magnets to suspend a plastic sheet underneath the front portion of the frame.

**Step 3: CRC Application.** Dealers will apply the Corrosion Resistant Compounds as follows:

- **Apply 712AM.** Set up Vaupel spray gun and insert 360° spray nozzle a specified distance into selected holes in the frame. Press spray gun trigger and pull out nozzle at fixed speed while spraying interior surface of frame with one liter of 712AM. When finished, insert rubber plugs and foam blocks to keep 712AM in the frame.
- **Remove plastic sheet suspended from frame.**

- **Lower lift.** Lower the lift until the top of the rear portion of the frame is approximately 4'6" above the floor.

- **Apply Noxudol 300 S to top external surface of rear portion of frame.** Set up Vaupel spray gun and locate unidirectional handheld spray nozzle 4-8 inches from frame surface. Press spray gun trigger and spray Noxudol 300 S on the top of rear portion of the frame by moving spray nozzle at fixed speed across frame surface.

- **Reattach truck bed assembly.**

- **Raise truck on lift.**

- **Apply Noxudol 300 S to frame bottom and side external surfaces.** From the same working distance, press spray gun trigger and apply remaining Noxudol 300 S to bottom and side external surfaces of entire frame at fixed speed. Refill spray gun with Noxudol 300 S as needed until all three (3) liters of material are used.

- **Final steps.** Reinstall components of vehicle; remove all masking; remove truck from lift; and spray Noxudol 300 S on areas of frame previously covered by lift arms. Allow 712AM and Noxudol 300 S to dry overnight before returning vehicle to customer. Comply with any recordkeeping and material handling requirements.
MATERIAL SAFETY DATA SHEET

PARKER INDUSTRIES
16-8, NIHONBASHI 2-CHOME,
CHUO-KU, TOKYO 103-0027, JAPAN
TELEPHONE: (03) 5205-1973
FAX: (03) 5205-1981

EMERGENCY CONTACT:
CHEMTREC (800) 424-9300

HMIS HAZARD RATING

<p>| | |</p>
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</tbody>
</table>

Date of Review:   Revised: March 17, 2011
Date of Preparation: November 14, 2007

SECTION 1: PRODUCT IDENTIFICATION

Product Name: 712AM
Chemical Family: Petroleum oil/additive blend
Material Usage: Corrosion Preventive Compound

EMERGENCY OVERVIEW: Petroleum oil-based product. When product burns it releases typical hydrocarbon products of combustion. Refer to Section 3 for health effects and to Section 5 for fire hazard data.

SECTION 2: HAZARDOUS INGREDIENTS

<table>
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<tr>
<th>Component</th>
<th>Wt%</th>
<th>Recommended Exposure Limits (TWA)</th>
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<tbody>
<tr>
<td>Microcrystalline wax</td>
<td>5-10</td>
<td>ACGIH TLV: 2 mg/m³</td>
</tr>
<tr>
<td>CAS #64742-42-3</td>
<td></td>
<td>OSHA PEL: 2 mg/m³</td>
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<tr>
<td>Petroleum distillates, solvent dewaxed</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³</td>
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<td>heavy paraffinic</td>
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<td>OSHA PEL: 5 mg/m³</td>
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<td>CAS #64742-65-0</td>
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<td></td>
</tr>
<tr>
<td>Sulfonic acids, petroleum,</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>Calcium salts, overbased</td>
<td></td>
<td>OSHA PEL: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>CAS #68783-96-0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>White mineral oil, petroleum</td>
<td>50-60</td>
<td>ACGIH TLV: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>CAS #8042-47-5</td>
<td></td>
<td>OSHA PEL: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>Bentonite, quaternary ammonium</td>
<td>0.3-1.0</td>
<td>Not established</td>
</tr>
<tr>
<td>compound modified</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CAS# 68953-58-2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Soybean oil polymer with isophthalic acid and pentaerythritol  
CAS# 66071-86-1  
0.4-4  Not established

Castor oil, dehydrated, polymerized  
CAS# 68038-02-8  
5-15  Not established

Calcium Carbonate  
CAS #471-34-1  
5-10  OSHA PEL: 5 mg/m³ (respirable fraction) 
OSHA PEL: 15 mg/m³ (total dust) 
ACGIH TLV: 10 mg/m³ (^[2] nuisance dust)

^[2] This component poses a hazard only if a dust is formed, i.e., by sawing, sanding, drilling, etc.

SECTION 3: HEALTH HAZARD INFORMATION

Primary Routes of Entry: Skin absorption, eyes (splashing).

Acute Effects: May cause eye irritation and reversible skin irritation. Prolonged skin exposure may cause dermatitis or oil acne. Breathing mists may cause dizziness or pulmonary irritation.

Chronic Overexposure:

Carcinogenicity: None of the components of this product are listed as carcinogens by NTP, IARC, or OSHA 1910(Z).

Pre-Existing Medical Conditions Aggravated by Exposure: Exposure may aggravate pre-existing respiratory or skin problems.

SECTION 4: FIRST AID PROCEDURES

Inhalation (mist): Move victim to fresh air and call emergency medical care. If not breathing, give artificial respiration; if breathing is difficult, give oxygen.

Eyes: In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Seek immediate medical attention.

Skin: Wash skin with soap and water. Remove and isolate contaminated clothing and shoes at the site.

Ingestion: DO NOT INDUCE VOMITING. Consult a physician. If vomiting occurs spontaneously, keep head below hips to prevent aspiration of liquid into the lungs.

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

Explosive Limits: LEL: N/A  UEL: N/A

EXTINGUISHING MEDIA: Small Fires: Dry chemical, CO₂, water spray, or regular foam. Large Fires: Water spray, fog, or regular foam. Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles. If this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

Special Firefighting Protection/Emergency Action: Fire may produce irritating or poisonous gases. Positive pressure self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection. Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind; keep out of low areas. Isolate for 1/2 mile in all directions if tank, rail car or tank truck is involved in fire. If runoff from fire control occurs, notify the appropriate authorities.

Unusual Fire/Explosion Hazards: Combustible material; may be ignited by flames. Container may explode in heat of fire.

Products of Combustion: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.
SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Steps to be taken in case Material is Released or Spilled: Shut off ignition sources; no flares, smoking or flames in hazard area. Stop leak if you can do it without risk.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of liquid spill for later disposal.

SECTION 7: SAFE HANDLING INFORMATION

Precautions To Be Taken In Handling/Storage: Store in cool, well-ventilated area. Keep away from flames. Never use a torch to cut or weld on or near container.
Other Precautions: Never wear contaminated clothing. Launder or dry clean before wearing. Discard oil-soaked shoes. Wash thoroughly with soap and water (waterless hand cleaner may be helpful in removing residues) after use and before smoking or eating. Avoid excessive skin contact.

SECTION 8: EXPOSURE CONTROLS

Respiratory Protection: NIOSH-approved respirator for organic vapor and mist to control exposure where ventilation is inadequate.
Ventilation: General and local exhaust.
Personal Protective Equipment: Protective Gloves: Impervious gloves (Viton, PVOH, etc.) Eye Protection: Safety glasses with sideshields or chemical goggles. Other Protective Clothing or Equipment: If splashing is anticipated, wear rubber apron and boots or other protective equipment to minimize contact.

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable
Incompatibility: Strong acids, oxidizing agents.
Hazardous Decomposition Products: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.
Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

Color: Tan
Appearance: Viscous Liquid
Odor: Oil
Boiling Point (initial): NA
Evaporation Rate (n-Butyl Acetate=1): <<1
Vapor Pressure (mmHg @ 20°C): 3.4
Vapor Density (air=1): NA
Solubility in Water: Not Determined
Specific Gravity: .9-1.0
pH: Not Applicable
Percent Volatile by Volume: 0

SECTION 11: DISPOSAL CONSIDERATIONS

Waste Disposal Methods: Dispose of in accordance with state, local and federal regulations. Materials may become a hazardous waste through use. If permitted, incineration may be practiced. Consider recycling solvent.
SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)
VOC per gallon: 0.165 lbs/gal

EPA Hazardous Waste Number(s) (40CFR Part 261): D001
EPA Hazard Category (40CFR Part 370): DELAYED (CHRONIC)

SARA TITLE III
This product contains the following TOXIC CHEMICALS subject to the Reporting Requirements of Sec. 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and of 40CFR Part 372:

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>WT %</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This product contains the following EXTREMELY HAZARDOUS SUBSTANCE(S) subject to the Emergency Planning Requirements under Sec. 301-303 (40CFR Parts 300 and 355) and Emergency Release Notification Requirements under Sec. 304:

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>WT %</th>
<th>RQ/TPQ Lbs</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(CERCLA LIST) This product contains the following HAZARDOUS SUBSTANCE(S) subject to Emergency Release Notification Requirements under Sec. 304 (40 CFR Part 302):

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>WT %</th>
<th>Final RQ Lbs</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

CALIFORNIA PROPOSITION 65
This product may contain trace quantities of the following chemicals that are identified by the State of California under the Safe Drinking Water and Toxic Reinforcement Act of 1986 ("Proposition 65") as either a carcinogenic or reproductive hazard:

<table>
<thead>
<tr>
<th>CHEMICAL</th>
<th>CAS NO.</th>
<th>Estimated Concentration %</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Although the information contained herein is believed to be reliable, it is furnished without warranty of any kind. This information is not intended to be all-inclusive as to the manner and conditions of use, handling, and storage.
1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S  
Synonyms: None  
Product Codes: None  
Chemical Name: Anti Rust Compound  
Product Use: Vehicle Underbody Coating

Manufacturer: Auson AB  
Verkadsgatan 3  
S-434 42 Kungsbacka  
Sweden  
www.auson.se

US Distributor: Soken Trade Corporation  
12055 Sherman Way  
North Hollywood, CA  
USA  
www.noxudolusa.com

PHONE: +46 300-562000  
(800) 598-3535  
FAX: +46 300-562001  
(818) 308-8427

For Chemical Emergency (Spill, Leak, Fire, Exposure, or Accident) Call CHEMTREC Day or Night  
USA or Canada: 1-800-424-9300 Outside USA or Canada: +1 703-527-3887 (collect calls ok)

PREPARED BY: MSDS Authoring Services  
VERSION: 1  
ISSUE DATE: March 1, 2011  
SUPERSEDES DATE: None

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th>Amount % by Wt.</th>
<th>CAS Number</th>
<th>OSHA PEL (ppm)</th>
<th>ACGIH STEL (ppm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solvent-refined heavy paraffinic distillate</td>
<td>30-60%</td>
<td>64741-88-4</td>
<td>5</td>
<td>None</td>
</tr>
<tr>
<td>Petroleum sulfonate, calcium salt, calcium hydroxide and calcium carbonate dispersion</td>
<td>20-30%</td>
<td>68783-96-0</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Fatty acids, tall-oil, polymers with isophthalic acid, pentaerythritol and tall oil</td>
<td>10-20%</td>
<td>68410-37-7</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Paraffin and hydrocarbon waxes</td>
<td>10-20%</td>
<td>8002-74-2</td>
<td>None</td>
<td>2 (fume)</td>
</tr>
<tr>
<td>Calcium carbonate (limestone) used as filler/pigment</td>
<td>&lt;2%</td>
<td>1317-65-3</td>
<td>15 for total dust; 5 for respirable fraction</td>
<td>10 for total dust; 3 for respirable fraction</td>
</tr>
<tr>
<td>Carbon black</td>
<td>1%</td>
<td>1333-86-4</td>
<td>3.5</td>
<td>3.5</td>
</tr>
<tr>
<td>Crystalline silica</td>
<td>&lt;0.1%</td>
<td>14808-60-87</td>
<td>10/(%SiO2+2) (respirable)</td>
<td>2.5</td>
</tr>
</tbody>
</table>

California Prop 65: This product may contain trace quantities of chemicals that are identified by the State of California under the Safe Drinking Water and Toxic Reinforcement Act of 1986 (“Proposition 65”) as either a carcinogenic or reproductive hazard.

HAZARDS DISCLOSURE: This product contains known hazardous materials in reportable levels as defined by the OSHA Hazard Communication Standard 29 CFR 1910.1200 except as listed above. As defined under Sara 311 and 312, this product contains known hazardous materials.
3. HAZARDS IDENTIFICATION

**EMERGENCY OVERVIEW:**

*CAUTION! COMBUSTIBLE LIQUID.*

HMIS/NFPA Rating: See Section 16

**POTENTIAL HEALTH EFFECTS**

**ROUTES OF ENTRY:** Skin contact, eye contact, inhalation and ingestion.

**INHALATION:** High vapor concentrations may cause headache, dizziness, fatigue, nausea, and vomiting.

**INGESTION:** May cause abdominal pain, nausea, and vomiting.

**SKIN CONTACT:** Contact may be irritating to skin. May defat skin.

**EYE CONTACT:** Contact may be irritating to eyes. May cause stinging.

**CHRONIC EXPOSURE:** There are currently no known adverse health effects associated with chronic exposure to this product.

**ACUTE HEALTH HAZARDS:** Moderate irritating to the skin. Slightly irritating to the eyes. May be harmful if inhaled.

**AGGRAVATION OF PRE-EXISTING CONDITIONS:** Persons with pre-existing skin disorders, eye problems, or respiratory function may be more susceptible to the effects of this substance.

**TARGET ORGANS:** Eyes, skin, and respiratory system.

**CARCINOGENICITY:**

- OSHA: Not listed
- ACGIH: Not listed
- NTP: Not listed
- IARC: Not listed

**POTENTIAL ENVIRONMENTAL EFFECTS:** Not considered to be harmful to aquatic life.

4. EMERGENCY AND FIRST AID PROCEDURES

**INHALATION FIRST AID:** If inhalation is experienced or suspected, move exposed person to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately if symptoms persist.

**SKIN CONTACT FIRST AID:** In case of contact, immediately flush skin with soap and water. Remove contaminated clothing and shoes. Wash clothing before reuse. Call a physician if irritation develops.

**EYE CONTACT FIRST AID:** Immediately flush eyes with plenty of water for at least 15 minutes, lifting lower and upper eyelids occasionally. Get medical attention immediately if symptoms persist.

**INGESTION FIRST AID:** If swallowed, give a few tablespoons of cooking oil, sour cream, cream, or other liquid fat. Contact the poison control center. DO NOT INDUCE VOMITING unless directed to by a poison control center or physician. Never give anything by mouth to an unconscious person.

**STATEMENT OF PRACTICAL TREATMENT:** Always have plenty of water available for first aid. Get medical attention if any symptoms develop or persist.

**NOTES TO PHYSICIANS OR FIRST AID PROVIDERS:** This product has low oral, dermal, and inhalation toxicity. Aspiration during swallowing or vomiting may severely damage the lungs.
5. FIRE AND EXPLOSION HAZARD DATA

**FLAMMABLE PROPERTIES:** Not flammable. Combustible.

**AUTO IGNITION TEMPERATURE (ASTM E659):**

**HOT-FLAME AUTOIGNITION TEMPERATURE (AIT):**
- **MINIMUM IGNITION TEMPERATURE:** 750°F
- **IGNITION DELAY:** 12 Seconds
- **BAROMETRIC PRESSURE, TORR:** 766

**COOL-FLAME AUTOIGNITION TEMPERATURE (CFT):**
- **MINIMUM IGNITION TEMPERATURE:** 745°F
- **IGNITION DELAY:** 120 Seconds
- **BAROMETRIC PRESSURE, TORR:** 766

**REACTION THRESHOLD TEMPERATURE FOR PRE-FLAME (RTT):**
- **MINIMUM REACTION TEMPERATURE:** 740°F

**LIMITS OF FLAMMABILITY IN GENERAL ACCORDANCE WITH ASTM E-681 AT 200°C**
- **LOWER FLAMMABLE LIMIT (LFL):** 1.81 %
- **UPPER FLAMMABLE LIMIT (UFL):** See Note

*Note: Due to the nature of the sample and its addition into the test apparatus, it is difficult to determine the upper flammable limit.*

**FLASH POINT:** 140°C  285°F  Method Used: ASTM D93

**EXTINGUISHING MEDIA:** Dry chemical, foam or carbon dioxide.

**UNSUITABLE EXTINGUISHING MEDIA:** Water spray may be unsuitable.

**FIRE & EXPLOSION HAZARDS:** Above flash point, vapor-air mixtures are explosive within flammable limits noted above. Containers may explode when involved in a fire.

**PRECAUTIONS FOR FIREFIGHTERS:** In the event of a fire, wear full protective clothing and NIOSH-approved self-contained breathing apparatus with full face piece operated in the pressure demand or other positive pressure mode. Toxic gases and vapors may be released if involved in a fire.

**UNUSUAL FIRE AND EXPLOSION HAZARDS:** Not applicable

**HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS:** Not available.

6. ACCIDENTAL RELEASE MEASURES

**ACCIDENTAL RELEASE MEASURES:** Remove all sources of ignition.

**PERSONAL PRECAUTIONS:** Wear appropriate protective clothing (see SECTION 8). Isolate release area and deny entry to unnecessary and unprotected personnel.

**ENVIRONMENTAL PRECAUTIONS:** Do not allow spill to enter sewers or waterways. Do not flush to sewer.

**METHODS FOR CONTAINMENT:** Contain spill with sand or earth. Do not use combustible materials, such as sawdust.

**METHODS FOR CLEAN-UP:** Collect spilled material and non-combustible absorbent and place in a container for disposal. Clean spill area thoroughly.

**OTHER INFORMATION:** Report spills to authorities as required.

7. HANDLING AND STORAGE
RECOMMENDED STORAGE CONDITIONS: Keep in a tightly closed original container, at temperatures less than 105°F (40°C). Keep containers closed when not in use.

SHELF LIFE: See label on packaging.

HANDLING (PERSONNEL): Wear appropriate personal protective equipment (see SECTION 8). Avoid contact with eyes. Avoid contact with skin or clothing. Avoid breathing vapors. Use only with adequate ventilation. Wash thoroughly with soap and water after handling. Keep away from heat, flames, and sparks.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

<table>
<thead>
<tr>
<th>CAS NO.</th>
<th>CHEMICAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>64741-88-4</td>
<td>Solvent-refined heavy paraffinic distillate  mg/m3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>5</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>none</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>none</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>5</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>none</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>none</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CAS NO.</th>
<th>CHEMICAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>68783-96-0</td>
<td>PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION MG/M3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CAS NO.</th>
<th>CHEMICAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>68410-37-7</td>
<td>FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL MG/M3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CAS NO.</th>
<th>CHEMICAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>8002-74-2</td>
<td>PARAFFIN AND HYDROCARBON WAXES</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>2 (FUME)</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
</tr>
</tbody>
</table>

CALIFORNIA PROPOSITION 65: This product may contain trace quantities of chemicals that are identified by
the state of California under the safe drinking water and toxic reinforcement act of 1986 ("proposition 65") as either a carcinogenic or reproductive hazard:

1317-65-3  CALCIUM CARBONATE (LIMESTONE)  
MG/M3  
OSHA PEL-TWA:  15 FOR TOTAL DUST; 5 FOR RESPIRABLE FRACTION  
OSHA PEL STEL:  NONE  
OSHA PEL CEILING:  NONE  
ACGIH TLV-TWA:  0 FOR TOTAL DUST; 3 FOR RESPIRABLE FRACTION  
ACGIH TLV STEL:  NONE  
ACGIH TLV CEILING:  NONE  

1333-86-4  CARBON BLACK  
MG/M3  
OSHA PEL-TWA:  3.5  
OSHA PEL STEL:  NONE  
OSHA PEL CEILING:  NONE  
ACGIH TLV-TWA:  3.5  
ACGIH TLV STEL:  NONE  
ACGIH TLV CEILING:  NONE  

14808-60-7  CRYSTALLINE SILICA  
MG/M3  
OSHA PEL-TWA:  \( \frac{10}{(\%SIO2+2)} \) (RESPIRABLE)  
OSHA PEL STEL:  NONE  
OSHA PEL CEILING:  NONE  
ACGIH TLV-TWA:  0.025 (RESPIRABLE)  
ACGIH TLV STEL:  NONE  
ACGIH TLV CEILING:  NONE  

(Crystalline Silica and carbon black only present hazards as respirable particles of 10 microns or less. Both are bound in the coating and will not be released as respirable particles)

VENTILATION SYSTEM: A system of local and/or general exhaust is recommended to keep employee exposures below the airborne exposure limits. Local exhaust ventilation is generally preferred because it can control the emissions of the contaminant at its source, preventing dispersion of it into the general work area. Please refer to the ACGIH document, *Industrial Ventilation, A Manual of Recommended Practices*, most recent edition, for details.

PERSONAL RESPIRATORS (NIOSH APPROVED): If respirator use is desired, or if exposure limit values are exceeded, use NIOSH approved respirator and type A filters (brown, organic substances).

SKIN PROTECTION: Avoid prolonged skin contact. Chemical resistant (nitrile) gloves recommended for operations where skin contact is likely. Wear appropriate protective clothing or boots as needed. Workers should wash exposed skin several times daily with soap and water. Soiled work clothing should be laundered or dry-cleaned.

EYE PROTECTION: Safety glasses, chemical type goggles, or face shield recommended to prevent eye contact.

GENERAL HYGIENIC PRACTICES: Wash thoroughly with soap and water after handling, before eating, drinking, smoking, or using toilet facilities. Do not smoke during use.
9. PHYSICAL/CHEMICAL CHARACTERISTICS

FORM: Highly viscous liquid
COLOR: Black
ODOR: Slight mineral oil like odor
BOILING POINT: >390°F (>200°C)
SOLUBILITY IN WATER: Not soluble in water
SPECIFIC GRAVITY: .96 at 20°C (68°F) (Water =1)
EVAPORATION RATE: (BuAc=1): Not applicable
POUR POINT (ASTM) D97): +30
AUTOIGNITION TEMPERATURE: >750°F 399°C)
FLASH POINT: 285°F (140°C) ASTM D93
pH: Not available
PERCENT SOLIDS BY WEIGHT: 98.9%
VISCOSITY: 500-650 Mpas - 73.4°F (23°C)
VOLATILE ORGANIC COMPOUNDS (VOC): 10.7 g/L using EPA Method 24
COLD FREEZE POINT (ASTM D97): +25
FREEZING POINT (ASTM D1177): This sample was too viscous to permit determination of its freeze point by
ASTM 1177.
VAPOR PRESSURE By Isoteniscope (ASTM D2879), torr:
32°F.................0.28
68°F.................1.0
100°F..............2.7
150°F..............11
200°F..............34
250°F..............90
300°F............160
350°F............270
400°F..............426
450°F..............600
485°F..............760

10. STABILITY AND REACTIVITY

STABILITY: Stable under ordinary conditions (70°F (21°C) and 14.7 psig (760 mmHg)), of use and storage.
CONDITIONS TO AVOID: Combustible atmospheres. Heat, flames, ignition sources, water (absorbs readily) and incompatibles.
POLYMERIZATION: Not available.
INCOMPATIBILITY WITH OTHER MATERIALS: Do not store near other combustible materials.
DECOMPOSITION: Not available.

11. TOXICOLOGICAL INFORMATION

EFFECTS OF EXPOSURE
ACUTE INHALATION: LC50 not available
EYES: Irritant
SKIN: Irritant
ACUTE INGESTION: LD50 not available
CHRONIC EFFECTS/CARCINOGENICITY: Calcium carbonate, the product itself, is not listed by NTP, IARC, or OSHA as a carcinogen. There is no reported health effects associated with prolonged exposure to pure calcium carbonate. This product contains variable quantities of crystalline silica (quartz), which is considered a hazard by inhalation. IARC has classified crystalline silica as probably carcinogenic for humans (2A). This classification is based on the findings of laboratory animal studies that were considered to provide sufficient evidence and data from human epidemiological studies that were considered to provide limited evidence for carcinogenicity.

Crystalline silica is also a known cause of silicosis, a noncancerous lung disease. NTP and OSHA have not classified crystalline silica as a carcinogen.

Carbon black has been classified by IRAC as a Category 2B (known animal carcinogen, possible human carcinogen) material. This was based on the results of rat inhalation studies of carbon black, despite the lack of parallel evidence on humans or other animal species.

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

ECOTOXICITY: This product is not toxic or harmful to the environment.
PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.
MOBILITY: Highly viscous liquid is not water soluble and is not expected to be mobile.
BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

WASTE DISPOSAL METHOD: It is the responsibility of the generator to determine at the time of disposal the proper classification and method of disposal. Disposal should be in accordance with applicable federal, state, and local regulations. Local regulations may be more stringent than regional or national requirements.

RCRA INFORMATION: If this material as supplied becomes a waste, it does not meet the criteria of a hazardous waste as defined under the Resource Conservation and Recovery Act (RCRA) 40 CFR 261.

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

CLASS: None
PRODUCT LABEL: Noxudol 300 S
UN NUMBER: None
PACKING GROUP: None
D.O.T. SHIPPING NAME: Consumer Commodity, ORM-D
PRODUCT RQ (LBS): None
ERG Guide Number: None
SUPPLEMENTAL HAZARD: None
VESSEL STOWAGE LOCATION: None
SHIPPING RESTRICTIONS: None
15. REGULATORY INFORMATION

U.S. FEDERAL REGULATORY STATUS

TSCA (TOXIC SUBSTANCE CONTROL ACT): All of the components of this product are listed on the TSCA inventory.

CERCLA (COMPREHENSIVE RESPONSE COMPENSATION, AND LIABILITY ACT): This product is NOT subject to CERCLA reporting requirements; however, many states have more stringent release reporting requirements. Report spills required under federal, state and local regulations.

SARA TITLE III (SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT): This product does not contain any chemicals subject to SARA Title III. 311/312 HAZARD CATEGORIES: Slight Health Hazard, Slight Flammability Hazard

CAA (CLEAN AIR ACT): This product conforms to the VOC limits listed under Subpart B: National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings under Section 183(e)(3)(C).

OTC (OZONE TRANSPORT COMMISSION): This product conforms to the VOC limits listed in Model Rule 2009 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations.

STATE REGULATIONS:

California Safe Drinking Water and Toxic Enforcement Act (Proposition 65): This product is known to contain chemicals currently listed as carcinogens or reproductive toxins as regulated under California Proposition 65.

California Air Resource Board (CARB) Suggested Control Measure for Automotive Coatings: This product conforms to the VOC limit for the automotive undercoating.

LOCAL REGULATIONS

SCAQMD (SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT) RULE 1151: This product conforms to the VOC limits listed under Rule 1151—Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, Appendix A.

BAAQMD (BAY AREA AIR QUALITY MANAGEMENT DISTRICT) RULE 8-45: This product conforms to the VOC limits listed under Rule 8-45—Motor Vehicle and Mobile Equipment Coating Operations.

INTERNATIONAL REGULATIONS:

Europe: All ingredients conform to the EU requirements.
Regulation (EC) nr. 1907/2006
EEC-directive 2006/121/2006
No label required

16. OTHER INFORMATION

Label Requirements: WARNING! COMBUSTABLE!

<table>
<thead>
<tr>
<th>Hazardous Material Information System (HMIS):</th>
<th>Health</th>
<th>Flammability</th>
<th>Reactivity</th>
<th>Personal Protection</th>
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<tbody>
<tr>
<td></td>
<td>1</td>
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<td>0</td>
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</table>
National Fire Protection Association (NFPA):

NFPA Ratings: Health: 1, Flammability: 1, Reactivity: 0

NFPA/HMIS Definitions: 0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme
Protective Equipment: Goggles & shield; lab coat & apron; vent hood; proper gloves; class b extinguisher.

Prepared By: Donato Polignone (MSDS Authoring Services)   Part Number: --
Approved By: Soken Trade Corporation
Approval Date: April 18, 2011     Supersedes Date: March 1, 2011

ADDITIONAL INFORMATION:

The data in this Material Safety Data Sheet relates only to the specific material designated herein. It does not relate to use in combination with any other material or in any process. This Material Safety Data Sheet (MSDS) has been reviewed to fully comply with the guidance contained in the ANSI MSDS standard (ANSI Z400.1-2004)

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of Soken Trade Corporation. The data on this sheet are related only to the specific material designated herein. Soken Trade Corporation assumes no legal responsibility for use or reliance upon these data.

To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

END OF MSDS
(This page intentionally left blank.)
ATTACHMENT 2: DESCRIPTION OF LOCATION WHERE THE CRC PROGRAM WILL TAKE PLACE AT [INSERT NAME OF DEALERSHIP]

- We will conduct the CRC program in our existing dealership service area located at [Insert Dealer Address]. Our dealership has a valid certificate of occupancy for vehicle service and is compliant with existing fire, building, mechanical, and zoning codes for vehicle service/repair garages.

Insert description of the service area at your dealership where the CRC program will be conducted.

- We will store CRC materials in accordance with applicable codes governing the storage of combustible liquids.

Insert a description of the storage area to be used for CRC materials.

- We will ensure that the CRC program is conducted in an area that has adequate ventilation.

Insert a description of the method of ventilation in the vehicle service area where the CRC program will be conducted.
The materials used in the Tundra B0D – 712AM and Noxudol 300 S – are not considered hazardous waste when they are discarded. In addition, as is the case for the Tacoma LSC 90D, the B0D spray guns do not need to be cleaned as long as you store them in accordance with the Technical Instructions. Therefore, the B0D should not generate any hazardous waste and any discarded materials used exclusively for performing the B0D – such as the plastic sheet suspended from the frame or the plastic bags used to cover the brake assemblies during spraying – do not need to be managed as hazardous waste. Such B0D-exclusive waste will not count toward your monthly hazardous waste generation totals.

However, one of the materials used in the LSC 90D – X128T – may be considered a hazardous waste when discarded due to its combustibility. Therefore, assuming, the B0D will occur in the same spray space as the LSC 90D, there may be common materials, such as floor tarps and rags used for cleanup, that if discarded will need to be managed as hazardous waste. Such materials will count toward your monthly waste generation totals and may impact your generator status.

To ensure proper waste handling, you should develop a procedure at your dealership for distinguishing between 3 categories of waste: (1) B0D-only, (2) LSC 90D-only, and (3) combined B0D and LSC 90D wastes. Categories (2) and (3) will need to be managed as hazardous waste, while Category (1) will not. To assist in your compliance, this section provides a brief overview of the hazardous waste requirements as they may relate to these programs.

**Regulatory Note Regarding EPA ID Number:** Prior to beginning the LSC 90D, your dealership should have obtained an EPA Hazardous Waste ID Number if it did not already have one. Although the B0D alone should not generate any hazardous waste, as discussed above, if you conduct the B0D in the same spray space as the LSC 90D you will need to manage any 90D-only or B0D-90D combined waste from the common B0D-LSC 90D spray space as hazardous waste, which requires an EPA Hazardous Waste ID Number. The EPA ID Number requirement applies to each location at your dealership with a separate mailing address. If you do not have an EPA Hazardous Waste ID Number for the building where the B0D and LSC 90D will be conducted, the LSC 90D Dealer Information Packet explains how to obtain one.
Regulatory Note Regarding B0D Tarps and Partitions: If, as we assume, the LSC 90D and B0D are conducted in a common spray space, then the tarps/partitions used would be combined B0D-LSC 90D waste, and therefore, should be managed like other hazardous waste when you dispose of them. The weight of these tarps counts against the monthly hazardous waste management limits noted below. Given their size and weight, the tarps/partitions could represent a large quantity of waste if disposed of frequently and could impact your compliance with the limits noted below. Therefore, we recommend that you reuse the tarps and other materials used to create the partitions described in the Technical Instructions.

1. If you are already a registered Small Quantity Generator (SQG) (i.e., because you generate more than 220 pounds of hazardous waste per month), you may stop reading as you are likely already familiar with the requirements noted below. The B0D will not impact your generator status.

2. For all other dealerships, if you generate hazardous waste, you must have notified the Ohio Environmental Protection Agency and have an EPA Identification Number (EPA ID Number). The EPA ID Number requirement does not apply across your entire dealership, but to each location at your dealership with a separate mailing address.

3. If you are not a Small Quantity Generator, do not generate more than 220 pounds of hazardous waste per month, or accumulate more than 2,200 pounds of hazardous waste at any time, the B0D will not impact your generator status.

   a. Your dealership will not have to become a registered SQG (and thereby be subject to additional requirements) if you stay below the two registered SQG triggers:

      (1) Generate no more than 220 pounds of hazardous waste in a calendar month; and

      (2) Accumulate no more than 2,200 pounds of hazardous waste at any one time.

   Important Compliance Note. The 220 pounds per month waste generation level and the 2,200 pounds accumulation level apply separately to each part of your dealership that has its own address and its own EPA ID Number.

4. Store all hazardous wastes in proper containers with proper labels, and maintain required records.
5. Dispose of all Hazardous waste only at facilities authorized to receive “Hazardous” Waste using a company licensed to transport such waste to the disposal facility.

6. Remember to count used oil against your monthly Hazardous Waste limit if you determine it to be hazardous.

b. In Ohio, used oil generally must be managed as hazardous waste if it is:

   (1) mixed with hazardous waste; and

   (2) either (i) exhibits a hazardous waste characteristic or (ii) contains a listed hazardous waste. (Note: Used oil containing more than 1,000 ppm of total halogens is presumed to be a hazardous waste, though this presumption can be rebutted.)

c. However, if you generate less than 220 pounds of hazardous waste in a calendar month, and non-halogenated hazardous waste is mixed with used oil, the hazardous waste/used oil mixture is regulated as used oil rather than as hazardous waste.

d. Such material regulated as used oil should be recycled in accordance with applicable used oil regulations. We assume that your dealership generates used oil, and therefore, is already familiar with the special hazardous waste recycling requirements for used oil.
(This page intentionally left blank.)
If your dealership is not located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, or Warren county (the “Nonattainment Counties”), then discontinue reading, as this Section does not apply to you.

Dealerships located in the Nonattainment Counties are subject to additional regulatory requirements under the Ohio Environmental Protection Agency (Ohio EPA) regulations. These requirements are identified in Sections 1-5 below. If you have any questions about these requirements, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

1. **NOTIFICATION REQUIREMENT**

   **Before starting the B0D**, each dealership located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, or Warren county must submit a notification to the Ohio EPA district office in their county. You do not need to receive a response to this notification, and may start the B0D **AFTER** it is submitted. When you submit this notification, it must be accompanied by the following documents (all of which can be found in Section 5 below on Recordkeeping):

   a. A cover letter indicating the name, address, and phone number of the facility where refinishing operations are taking place (a model letter can be found in Section 5 below on Recordkeeping);

   b. A copy of the August 27, 2009 letter from Ohio EPA confirming that the LSC spray guns are HVLP equivalent; and

   c. A copy of your completed Employee Training Log demonstrating that all employees applying B0D materials have reviewed and understand this Dealer Information Packet and the Technical Instructions.

This notification package must be submitted to one of the following Ohio EPA District Offices or Local Air Agency responsible for the county where your dealership is located:
2. **PRE-APPROVAL FOR THE VAUPEL HSDR 3300 SPRAY GUN (ALREADY OBTAINED BY TMS)**

   a. The Vaupel HSDR 3300 spray gun being used for the BOD requires an approval as “HVLP equivalent” from the Ohio EPA. TMS already obtained such an approval from Ohio EPA for the LSC 90D, and this approval also applies to the BOD. (See August 27, 2009 Letter from Ohio EPA in Section 5 below on Recordkeeping).

   b. You must do the following with this approval:

      i. Submit a copy of the approval with the notification form identified in Section 1 above;

      ii. Keep a copy of the approval in your files for a period of five (5) years (see Recordkeeping section below for a copy of this approval); and

      iii. Adhere to the conditions for operating the spray gun specified in Ohio EPA’s spray gun approval. (Note: You will satisfy these conditions if you conduct the BOD in accordance with the Technical Instructions).

3. **EMPLOYEE TRAINING**

   a. Before starting the BOD, all employees conducting the BOD at your dealership must receive training in the proper use, handling and storage of the BOD materials and equipment.

   b. To satisfy this training requirement:

      i. Have all employees who are conducting the BOD review and confirm that they understand this **Dealer Information Packet** and the **Technical Instructions**;

      ii. Ohio EPA also requires you to:
1. Keep a log demonstrating that such training has occurred for five (5) years from the completion of the B0D (the Recordkeeping section below contains a log that you can use for such purposes.); and

2. Submit a copy of the completed training log to Ohio EPA along with the notification form identified in Section 1 above.

4. **HOUSEKEEPING REQUIREMENT:** Dealerships located in the Nonattainment Counties must store all B0D materials, solvents, and waste in nonabsorbent, non-leaking containers and keep those containers closed at all times when not in use.

5. **RECORDKEEPING REQUIREMENTS**

   **IMPORTANT:** Please maintain these documents in your dealership’s records for a period of 5 years from the completion of the Tundra B0D.

In addition to the recordkeeping requirements contained in the Air Recordkeeping Section of this Guide, if your dealership is located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties (the Nonattainment Counties), you must (i) prepare and submit, as explained in Section 1 above, a notification to the Ohio EPA district office for your county, and (ii) keep records verifying that the employees conducting the B0D have received training. Ohio EPA regulations require the records identified below to be kept for five (5) years. To support your compliance with these requirements, you can use the following:

   a. An Automobile Refinishing Operations Notification that you need to customize for your dealership and submit to the Ohio EPA district office for the county where your dealership is located (see instructions for completing the notification on page 137).
      
      **You should submit this notice as soon as practicable after you receive this Dealer Information Packet. (Note: Before submitting this notice, the employees who will be conducting the B0D at your dealer must complete the training requirement noted below – see the training log enclosed with this Section).**

   b. The August 27, 2009 letter from Ohio EPA confirming that the Vaupel HSDR 3300 spray gun is HVLP equivalent, and therefore satisfies the requirements of OHIO ADMIN. CODE 3745:21-18(C)(1)(k) (“Ohio Spray Gun Approval”). You will need to attach this Approval to the Automobile Refinishing Operations Notification.

   c. Records verifying that all employees performing the B0D have completed the applicable training requirements (complete the attached “B0D Training Log”).
Note:

I. You will need to complete the Automobile Refinishing Operations Notification and submit it to your Ohio EPA District Office or Local Air Agency BEFORE you can start the B0D. You must include Items b and c with your notification – see Instructions on page 137.

II. Electronic copies of these materials are available on the C.L.E.A.N. Dealer website - http://cleandealer.com.
Instructions for Completing Automobile Refinishing Operations Notification

Dealers located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties must prepare and submit an Automobile Refinishing Operations Notification to the Ohio EPA District Office or Local Air Agency responsible for the county where they are located. We have an enclosed a model notification that you can use for your dealership. To complete the notification please do the following:

1. Put the model letter on your dealership’s letterhead;

2. Address the letter to the appropriate Ohio EPA District Office or Local Air Agency (see Table below for appropriate contact information);

3. In the body of the letter, insert the address where you will be conducting the LSC (NOTE: THIS SHOULD BE THE SAME ADDRESS AS LISTED ON YOUR OHIO EPA AIR PERMIT);

4. Date and Sign the Letter.

5. Remember to enclose the following with the Automobile Refinishing Operations Notification letter when you submit it:

   a. The August 27, 2009 letter from Ohio EPA confirming that the Vaupel HSDR 3300 spray gun is HVLP equivalent (enclosed in this Section); and

   b. A completed Employee Training Log for B0D Personnel (see the B0D Training Log enclosed in this Section)

6. Make a copy of the letter and attachments for your records before submitting it to your Ohio EPA District Office or Local Air Agency.

<table>
<thead>
<tr>
<th>Dealerships located in Clark, Greene, Miami, or Montgomery county</th>
<th>Dealerships located in Butler, Clermont, Hamilton, or Warren county</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cory. R. Chadwick, Director Dept. of Environmental Services Air Quality Programs 250 William Howard Taft Road Cincinnati, OH 45291-2660 (513) 946-7777</td>
<td>John Paul, Administrator Regional Air Pollution Control Agency Montgomery County Health Dept. 117 South Main St. Dayton, OH 45422-1280 (937) 225-4435</td>
</tr>
</tbody>
</table>
[DEALER LETTERHEAD]

[Insert Ohio EPA District Office or Local Air Agency Address as noted in instructions]

Re: Reporting requirements for commercial motor vehicle and mobile equipment refinishing operations.

Dear ________________:

Toyota is implementing a corrosion resistant compound (CRC) campaign ("Tundra B0D") for the frames of a select number of Toyota Tundra vehicles. Toyota has asked our dealership to take part in this B0D. The B0D will involve the spray application of two materials to frame rails on the underside of these vehicles. Our dealership has already been issued a Permit to Install and Operation ("PTIO") that covers the B0D.

Toyota previously conducted a similar CRC campaign for select Toyota Tacoma pick-up trucks, for which our dealership received a PTIO from the Ohio EPA. On October 13, 2011, based on information submitted by Toyota, the Ohio EPA confirmed that the Tundra B0D falls within the scope of both (a) our dealership’s PTIO and (b) the HVLP equivalency determination issued by Ohio EPA on August 27, 2009 for the Vaupel HSDR 3300 spray gun.

Consistent with the requirements of the Ohio Administrative Code (“OAC”) 3745-21-18, Commercial Motor Vehicle and Mobile Equipment Refinishing Operations, we are hereby notifying you that our dealership will begin refinishing certain automobiles as part of the B0D using two HVLP-equivalent spray guns. The purpose of this letter is to comply with OAC 3745-21-18’s notification requirement.

The B0D will be conducted at the address listed below:

[Insert address of location where B0D will be conducted]

As required by OAC 3745-21-18, please find the following documents enclosed with this letter:

(1) The August 27, 2009 letter from Ohio EPA confirming that the Vaupel HSDR 3300 spray gun is HVLP-equivalent, and therefore satisfies the requirements of OAC ADMIN. CODE 3745-21-18(C)(1)(k); and

(2) A log demonstrating that all dealership personnel who will be conducting the B0D have been trained in the proper use, handling and storage of the B0D materials and equipment.

If you have any questions or require any additional information, please do not hesitate to contact [Dealership] at [Number]. Thank you for your time and consideration.
Sincerely,

[Dealer]

[Dealership]

Attachments:
- August 27, 2009 letter from Ohio EPA regarding HVLP equivalency
- Employee Training Log for B0D Personnel
ATTACHMENT 1: AUGUST 27, 2009 LETTER FROM OHIO EPA CONFIRMING THAT THE VAUPEL HSDR 3300 SPRAY GUN IS HVLP EQUIVALENT
(This page intentionally left blank.)
AUG 27 2009

Chuck Taylor, P.E.
GT Environmental/Toyota Motor Sales, Inc.
635 Park Meadow Road, Suite 112
Westerville, Ohio 43430-81

Re: Vaupel HSDR 3300 spray gun transfer efficiency vs HVLP

Dear Mr. Taylor

This letter is in response to your letter dated August 3, 2009, in which you requested written approval to authorize the use of the Vaupel HSDR 3300 spray gun for the proposed implementation of a Limited Service Campaign (LSC) by Toyota Motor Sales in Ohio pursuant to Ohio Administrative Code (OAC) 3745-21-18(C)(1)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your letter, the supporting test documentation included in your letter and the approval letter from the South Coast Air Management District (SCAQMD) dated March 10, 2009.

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected county, specified in OAC rule 3745-21-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(1)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted indicates that the Vaupel HSDR 3300 spray gun is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as similarly found in the SCAQMD approval letter) and shall apply to any equipment operated in the affected counties in Ohio:

a. The Vaupol HSDR 3300 spray gun shall only be used to apply Daubert NOX-RUST X128T and NOX-RUST 712AM corrosion preventive coatings to the frame rails of Toyota Tacoma trucks model years 2001-2004 at the approved Toyota
dealerships in Ohio that have been authorized to perform such service during the Limited Service Campaign.

b. This approval is only valid if the air pressure supplied to the Vaupel HSDR 3300 spray gun is equal to or less than 50 psig when applying the Daubert NOX-RUST X128T coating and equal to or less than 75 psig when applying the Daubert NOX-RUST 712AM coating.

c. This approval is only valid if during actual operation the Vaupel HSDR spray gun is equipped with a 160 psig (full scale) mechanical pressure gauge with markings every 2 psig and the pressure gauge is operating properly.

d. The Vaupel HSDR 3300 spray gun shall be equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand when applying the corrosion preventive coatings. The Daubert NOX-RUST X128T protective coating shall only be applied to the exterior of the frame rails. The Daubert NOX-RUST 712AM protective coating shall only be applied to the interior of the frame rails. During operation, the maximum distance of the spray wand tip to the substrate to be coated shall not exceed 12 inches.

e. This approval is only valid for the Vaupel HSDR 3300 spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by Ohio EPA.

By means of this letter I am approving the use of the Vaupel HSDR 3300 spray gun as an equivalent coating application method. Ohio EPA will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method and will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a link on our website for this rule which will indicate that this spray gun has been approved as an equivalent method to HVLP.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,

[Signature]

Chris Korleski
Director
Ohio EPA

cc: Lee Burkleca, DAPC
ATTACHMENT 2: B0D PERSONNEL TRAINING LOG
(This page intentionally left blank.)
B0D – Training Log

Reporting Year: _______ Dealership name and location:
____________________________________________________________________________

**Instructions**: Dealerships in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties must use this log to confirm that the employees conducting the LSC have been trained as required by OHIO ADMIN. CODE 3745:21-18(C)(2). After complete this training, this record should be sent to the appropriate Ohio EPA District Office for your dealership (see the Nonattainment Counties – Notice & Recordkeeping Section for mailing address). A copy of this log must be kept in your records for five years after completion of the LSC.

**Pursuant to OHIO ADMIN. CODE 3745:21-18(C)(2)**, the undersigned have reviewed all of the 2000-2008 Model Year Toyota Tundra Corrosion Resistant Compound Campaign materials, including the Getting Started Guide, the Federal, State and Local Requirements Guide, and the Technical Instructions, and understand the proper use, handling and operation of the B0D materials and equipment.

<table>
<thead>
<tr>
<th>Employee Names/Date Trained</th>
<th>Signature of Dealer Principal:</th>
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**Date:**
____________________________________________________________________________

**Address & Contact Information for Dealer Principal:**
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**Important Document**
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