TO: RHODE ISLAND 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

RHODE ISLAND DEALER INFORMATION PACKET

This bound volume contains two parts of the Rhode Island 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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TO:       RHODE ISLAND DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

DATE:  2011

RE:   Information Packet for Tundra Corrosion-Resistant Compound Campaign B0D

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

RHODE ISLAND DEALER INFORMATION PACKET

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 liquid. 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.

**IMPORTANT**

**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 this campaign in the same spray space as LSC 90D. This Packet provides 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.
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 this new campaign. 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 CAN CONDUCT B0D CONCURRENTLY WITH THE TACOMA LSC 90D WITHOUT TRIGGERING AIR PERMITTING REQUIREMENTS**

*Do You Already Have An Air Permit?* If your dealership already has an air permit, then you may need to obtain a modification to that permit before proceeding with the Tundra B0D. If you have an air permit, please stop reading this Information Packet and call the EH&S Hotline (877-572-4347), for assistance.
The B0D CRC materials contain Volatile Organic Compounds (VOCs), Particulate Matter (PM) and other substances subject to federal, state and/or 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 50 tons per year (tpy) and less than 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 similar to B0D 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 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.

*If your dealership has an onsite or offsite body shop, please go to the C.L.E.A.N. Dealer website ([http://cleandealer.com](http://cleandealer.com)), or call the EH&S Hotline (877-572-4347), for more information and instructions.*

As for state “minor source” air permitting, Rhode Island regulations exempt a spraying process with a PTE of less than 100 lbs/day and 10 lbs/hour. Previously, Toyota Motor Sales, U.S.A. (TMS) contacted the Rhode Island Department of Environmental Management (RIDEM) and described the Tacoma LSC 90D spraying process. Based on this information, RIDEM confirmed that the LSC 90D process, if conducted consistent the description provided by TMS, should have a PTE below these daily and hourly permitting thresholds, and therefore, be exempt from permitting. TMS has received a similar determination from RIDEM for the Tundra B0D. Under this determination, you will be able to combine the B0D with your existing LSC 90D spraying process, and remain exempt from permitting, as long as your dealership:

4. **APPLIES THE CRCs 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 with the Vaupel HSDR 3300 in any service bay other than the one the one already approved as a spray space for LSC 90D.1

5. **ENSURES THE VOC AND PM EMISSIONS THAT OCCUR WHEN YOU ARE APPLYING THE CRCS**

(1) **ARE CONSISTENT WITH THE EMISSIONS LEVELS PRESENTED BY TMS TO RIDEM FOR THE PERMIT EXEMPTION DETERMINATION AND**

(2) **COMPLY WITH THE SEPARATE PM ALLOWABLE EMISSIONS RATE REGULATIONS (SEE STEP 5 BELOW).**

**YOU CAN DO SO 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:** 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:** 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.

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1 At the present time, Rhode Island dealers will conduct B0D in only one spray space and it will be the same spray space now being used for LSC 90D. After conclusion of the LSC 90D on December 31, 2011, TMS may decide to offer a CRC program for other Toyota vehicles in the future. 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 (together with your first spray space) would also fall under minor source air permitting thresholds as long as you did not process more than 1 Tundra every 2 hours in that space and also adhered to any processing limits that might apply to the other Toyota vehicles being offered a CRC program.
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.

6. **KEEP RECORDS THAT DOCUMENT VEHICLE PROCESSING AND EMISSIONS OF VOCs AND PM AS WELL AS OTHER REQUIRED RECORDS (SEE STEP 5 BELOW).**

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 tools that your dealership can use to assure compliance.

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

What Do I Need To Give My Local Fire Code Enforcement Official? *Appendix A 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 B0D.**
2. **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 B0D and see whether 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) 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
- Step 5 (compliance with hourly Allowable PM Emissions Rate and air permitting records), and
- Step 6 (comply with hazardous waste requirements). You should also review the **Guide to Federal, State and Local Requirements** to better understand the legal requirements for Steps 1, 2, 3, and 4.

**STEP 5 – COMPLY WITH HOURLY ALLOWABLE PM EMISSIONS RATES AND KEEP AIR REGULATORY COMPLIANCE RECORDS**

Separate from the state “minor source” permitting exemption for spraying processes with a PTE for VOCs and PM below 100 lbs/day and 10 lbs/hour, Rhode Island regulations impose a limit on actual PM emissions from such processes known as an hourly “Allowable PM Emissions Rate”. To comply with this limit, you should adhere to the vehicle processing limits discussed in Step 2 above by **processing to no more than 1 Tundra every 2 hours and no more than 1 Tacoma every 1 hour**. Also, you will be required to maintain records showing that your air emissions from the B0D and LSC 90D remain below the minor source air permitting thresholds for a spraying process discussed in Step 2 above and that you are complying with air regulations.

Due to differences in the external CRC being used and in the spray application times, the Tundra B0D and LSC 90D do not have the same hourly Allowable PM Emissions Rate,
and therefore the number of vehicles that can be processed per hour varies between the two programs.

**Tundra B0D:** The Allowable PM Emissions Rate for the Tundra B0D process is 0.064 pounds per hour. As long as your dealership conducts the Tundra B0D in accordance with the **Technical Instructions**, the B0D should have PM emissions of no more than 0.047 pounds per hour, and therefore, will fall below this Allowable PM Emissions Rate. However, this PM emissions level of 0.047 pounds per hour assumes it will take roughly 2 hours to apply both CRCs (i.e., 712AM and Noxudol 300 S) to a Tundra; if a Tundra were processed in a shorter amount of time, then the hourly PM emissions rate could be higher. Thus, to ensure compliance with the 0.064 pounds per hour Allowable PM Emissions Rate, **your dealership should limit vehicle processing to no more than 1 Tundra every 2 hours.**

**Tacoma LSC 90D:** The Allowable PM Emissions Rate for the LSC 90D process is 0.12 pounds per hour. As long as your dealership conducts the Tacoma 90D in accordance with the **Technical Instructions**, the LSC 90D should have PM emissions of no more than 0.068 pounds per hour, and therefore, will fall below this Allowable PM Emissions Rate. However, this potential PM emissions level of 0.068 pounds per hour assumes it will take roughly 1 hour to apply both CRCs (i.e., 712AM and X128T) to the Tacoma; if a Tacoma were processed in a shorter amount of time, then the hourly PM emissions rate could be higher. Thus, to ensure compliance with the 0.12 pounds per hour Allowable PM Emissions Rate, **your dealership should not process more than 1 Tacoma every 1 hour.**

**Record Keeping:** You will be required to maintain records in your dealership’s files showing that you fall below state air permitting thresholds (discussed in Step 2 above) and are complying with air regulations, including with the Allowable PM Emissions Rate. You also must keep records required to make a Regulation No. 30 submission to RIDEM each February for the LSC 90D, the B0D and any other “automotive refinishing” process conducted at your dealership. The **Air Recordkeeping Section** of the **Guide to Federal, State and Local Requirements** has instructions and recordkeeping forms that you can use to demonstrate your dealership is meeting the criteria identified in Step 2 above. *(No longer use the recordkeeping forms provided in the Tacoma LSC 90D Dealer Package.)*

**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.*

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2 Since sending the Tacoma LSC 90D Dealer Information Package in 2009, TMS has adopted a more conservative approach to calculating the allowable PM emissions rate. Only the revised emission rates are presented here. Under either calculation you should be in compliance with this requirement if you process no more than one Tacoma per hour.
The B0D spray guns (for use with Noxudol 300 S and 712AM) do not need to be cleaned and the B0D materials are not “hazardous waste” when discarded. Because Rhode Island does not recognize exemptions for Small Quantity Generators of hazardous waste, we assume you are already a Registered Generator of hazardous waste. Because the B0D will not generate hazardous waste, it should not impact your waste generator status. If you are not, however, a Registered Generator, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) and select the B0D link or call the EHS Hotline at (877) 572-4347.

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.
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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:** Make Sure You Can Conduct the Tundra B0D Without Triggering Air Permitting Requirements.

As long as your dealership does not already have an air permit or operate a large onsite or offsite body shop, then you should be able to conduct Tundra B0D and remain exempt from federal air permitting. As for state air permitting, RIDEM has issued a formal determination that B0D and LSC 90D fall below permitting thresholds. Consistent with this determination and to comply with the separate hourly Allowable PM Emissions Rates, your dealership must (1) apply the CRCs ONLY in the spray space already approved by your local code enforcement official for LSC 90D; (2) limit vehicle processing to NOT more than 1 Tundra every 2 hours and NOT more than 1 Tacoma every 1 hour; and (3) maintain proper records (see Step 5 below). If you already have an air permit, then call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss whether it must be revised.

**Step 3:** Notify Your Local Fire Official in Writing of Your Intention to Conduct This Campaign 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 S material) to you at no charge.

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

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

**Step 5:** Comply with Hourly PM Emissions Rates and Keep Air Regulatory Compliance Records.

To ensure compliance with hourly Allowable PM Emissions Rates applicable to the Tundra and Tacoma processes, you should limit vehicle processing to NOT more than 1 Tundra every 2 hours and NOT more than 1 Tacoma every 1 hour. Also, use the forms in Air Recordkeeping Section of this Packet to document that you are below air permitting thresholds and are complying with air regulations.

**Step 6:** Comply with Hazardous Waste Requirements.

Unlike Tacoma LSC 90D, Tundra B0D will not generate hazardous waste. Therefore, items used exclusively for B0D – such as plastic sheeting suspended from the front portion of the frame while applying 712 AM – will not, when discarded, need to be managed as hazardous waste. However, the LSC 90D does generate hazardous waste, and therefore, items being used for both the LSC 90D and B0D – such as floor tarps and clean up rags – will need, when discarded, to be managed as hazardous waste. Please continue to follow the instructions provided in the LSC 90D Dealer Information Packet for managing hazardous waste. Also, you will need proper procedures in place for distinguishing between B0D-only and combined LSC 90D/B0D waste.
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.
Please carefully review the entire Dealer Information Packet – including this Site Selection Section – with your Service and Parts Staff.

Various state and local fire, building and zoning codes 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.

**SITE SELECTION CONSIDERATIONS**

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

1) **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.*
2) **YOUR B0D WORK AREA MUST HAVE ALL OF THE FOLLOWING:**

   a) **Adequate ventilation** (whether natural or mechanical);

   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.

   b) **Be at least 20 feet from:** (1) open flames and/or spark-producing equipment and appliances; and (2) any drying, curing, and/or fusion apparatus;

   c) The B0D work area must be located **away from pits or other below-ground areas**;

   d) The B0D work area must have a **suitable lift** that allows clear access to the vehicle’s frame rails.

   e) The floor of the B0D work area must be covered by an approved, noncombustible, nonsparking, **fire retardant material**.

   f) **Fire extinguishers rated “B,” “AB,” or “ABC”** must be provided **within 30’** (even if the work area has an automatic fire protection system);  

   g) **Compressed air**;

   h) **Eyewash stations**;

   i) **Drop lights appropriate for** use during the spraying of **combustible liquids**;

3) **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.

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, 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.*

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3 A fire extinguisher should be in the vicinity even if the B0D work area has an automatic fire protection system (e.g., sprinklers).
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.
TO: RHODE ISLAND TOYOTA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D
RHODE ISLAND 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 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 utilize 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 will be a material known as “Noxudol 300 S.” You will be issued one additional Vaupel HSDR 3300 to apply the Noxudol 300 S for B0D.

Air emissions will occur during your application of these materials. Under these circumstances the following federal, state and local legal requirements will apply to the B0D:

- Air Emissions Regulations by the Rhode Island Department of Environmental Management (RIDEM); 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. In general, these laws allow air emissions up to a certain level and require a facility, if it wishes to exceed that level, to request permission from the state through an air permitting process.

   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 potential to emit (PTE) for VOCs is less than 50 tons per year (tpy) and less than 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, spray painting or other activities similar to B0D that use spray guns.

   c. As for state “minor source” air permitting, Toyota Motor Sales, U.S.A., Inc. (TMS) has obtained a determination from RIDEM that the B0D and LSC 90D is subject to a permit exemption for spraying processes with a PTE below 100 lbs/day and 10 lbs/hour. Your dealership will be in compliance with this determination as long as you:

      (1) Conduct the B0D and LSC 90D in a manner consistent with the VOC and PM emissions levels presented by TMS to RIDEM when obtaining the determination. To do so -- and to comply with the separate limit in Rhode Island on actual PM emissions from a spraying process known as an “Allowable PM Emissions Rate” -- your dealership should **limit vehicle processing to not more**
than 1 Tundra every 2 hours and 1 Tacoma every 1 hour; and

(2) Keep records that document compliance with Item (1) above and other required records.

d. If your dealership can not meet the criteria identified above, please call the EH&S Hotline (877-572-4347) for more information and instructions.

2. “AIR RECORDKEEPING” SECTION

a. The Air Recordkeeping Section contains the forms that your dealership will need to track the daily processing of vehicles and amount of coating usage for the Tundra B0D and Tacoma LSC 90D. These forms will provide confirmation that your air emissions from the B0D and LSC 90D remain below the minor source air permitting thresholds for a spraying process discussed in Step 2 above and that you are complying with air regulations, including with the Allowable PM Emissions Rate. You also must keep records required to make a Regulation No. 30 submission to RIDEM each February for the LSC 90D, the B0D and any other “automotive refinishing” process conducted at your dealership.

b. As explained in the Air Regulations Section, the state requires you to maintain compliance records for five (5) years beyond the date that you process the last Tundra under the B0D. (No longer use the recordkeeping forms provided in the Tacoma LSC 90D Dealer Package.)

c. 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 coating usage associated with the safety recall applicable to the rear portion of the frame of Tundra MY 2000-2003 that will continue beyond December 31, 2012.

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

a. The Fire, Building, and Zoning Codes Section reviews 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 Tundra B0D in compliance with these codes.

b. IMPORTANT: 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:

(1) Notify him/her that you plan to conduct this campaign in the same spray space as Tacoma LSC 90D.
c. The Fire, Building, and Zoning Codes Section contains a 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 this campaign. 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.

d. Prior to conducting the B0D, your dealership will also need to confirm that it can conduct the B0D in compliance with other building and zoning code requirements. Go to Table 1 in the Fire, Building and Zoning Codes Section for additional information.

4. “HAZARDOUS WASTE MANAGEMENT” SECTION

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

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 Vaupel HSDR 3300 spray guns being used for B0D do not need to be cleaned as long as you follow the procedures in the Technical Instructions for proper storage of the guns. 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, if, as we assume, the B0D will occur in the same spray space as the Tacoma 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. You should develop a procedure for your dealership to identify LSC 90D and joint LSC 90D/B0D waste as distinguished from B0D-only waste.

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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-Tundra 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 participation and cooperation in the Tundra Corrosion-Resistant Compound Campaign B0D.

TOYOTA MOTOR SALES, U.S.A., INC.
Do You Already Have An Air Permit?: If your dealership already has an air permit, then you may need to obtain a modification to that permit before proceeding with the B0D. If you have an air permit, please stop reading this Air Regulations Section and go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for assistance.

I. AIR PERMITTING REQUIREMENTS: ARE YOU EXEMPT?

The B0D Corrosion-Resistant Compounds contain 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 potential to emit (PTE) for VOCs is less than 50 tons per year (tpy) and less than 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 similar to B0D that use spray guns.

Important: Air Emission Limits Apply To Your Entire Dealership. Federal “major source” air permitting thresholds 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 body shop will have higher air emissions than a regular vehicle service area, you can not 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 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 an 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. If the common B0D-LSC 90D spray space is not in an existing service area at your dealership, or you plan to conduct the B0D at an off-site 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, Rhode Island regulations exempt a spraying process with a PTE of less than 100 lbs/day and 10 lbs/hour. Previously, Toyota Motor Sales, U.S.A. (TMS) contacted the Rhode Island Department of Environmental Management (RIDEM) and described the Tacoma LSC 90D spraying process. Based on this information, RIDEM confirmed that the LSC 90D process, if conducted consistent the description provided by TMS, should have a PTE below these daily and hourly permitting thresholds,
and therefore, be exempt from permitting. TMS has received a similar determination from RIDEM for the Tundra B0D. Under this determination, you will be able to combine the B0D with your existing LSC 90D spraying process, and remain exempt from permitting, as long as your dealership:

1. **Applies the CRCs 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 with the Vaupel HSDR 3300 in any service bay other than the one the one already approved as a spray space for LSC 90D.  

2. **Ensures the VOC and PM emissions that occur when you are applying the CRCs**

   (1) Are consistent with the emissions levels presented by TMS to RIDEM for the permit exemption determination and

   (2) Comply with the separate PM allowable emissions rate regulations of 0.064 pounds per hour (Tundra B0D) and 0.12 pounds per hour (Tacoma LSC 90D)

**You can do so processing**

| a. Not more than 1 Tundra every 2 hours; and |
| b. Not more than 1 Tacoma every 1 hour |

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

(2) 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.

(3) Example: 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

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4 At the present time, Rhode Island dealers will conduct B0D in only one spray space and it will be the same spray space now being used for LSC 90D. After conclusion of the LSC 90D on December 31, 2011, TMS may decide to offer a CRC program for other Toyota vehicles in the future. 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 (together with your first spray space) would also fall under minor source air permitting thresholds as long as you did not process more than 1 Tundra every 2 hours in that space and also adhered to any processing limits that might apply to the other Toyota vehicles being offered a CRC program.
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.

(4) Example: 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.

3. **Keep records that document vehicle processing and emissions of VOCs and PM as well as other required records (see “Air Recordkeeping” section for forms you can use to do so). (No longer use the recordkeeping forms provided in the Tacoma LSC 90D Dealer Package.)**

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

1. **Air Permitting**

   a. 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 50 tons per year (tpy) and less than 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 similar to B0D that use spray guns

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5 These VOC and PM PTE calculations are based on Tundra and Tacoma Units in Operation (UIO). For the calculation, the largest Tundra or Tacoma UIO for a dealership in Rhode Island is multiplied by the VOC or PM emissions associated with processing one 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 for B0D covers not only the Tundra MYs 2000-2003 now subject to B0D, but also additional MYs 2004-2008 now being evaluated for a possible future CRC customer satisfaction program. For the LSC 90D, the PTE represents Tacoma MYs 1996-2004.
b. TMS has obtained a determination from RIDEM confirming that no state “minor source” air permit is required for B0D and LSC 90D operations at your dealership. A copy of this determination has been included in the Air Recordkeeping Section of this Guide. RIDEM’s determination is based on an understanding that your dealership:

1. Applies the CRCs ONLY in the spray space already approved by your local code enforcement official for LSC 90D.

2. Keeps aggregate VOC and PM emissions from the B0D and LSC 90D combined below minor source permitting levels of 100 pounds per day and 10 pounds per hour for a spraying process.
   - Total potential emissions from the B0D and LSC 90D combined are 34.9 lbs/day and 2.98 lbs/hour for VOCs, and 1.3 lbs/day and 0.12 lbs/hour for PM, and therefore, fall well below the minor source permitting thresholds.

3. Conducts the B0D and LSC 90D in a manner that ensures VOC and PM emissions will be consistent with the emissions levels presented by TMS to RIDEM and will comply with the separate hourly Allowable PM Emissions Rates (discussed below). You can do so by limiting vehicle processing to:
   - Not more than 1 Tundra every 2 hours; and
   - Not more than 1 Tacoma every 1 hour.

4. Keeps records that document compliance with the criteria above and other required records (see Air Recordkeeping Section below).

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6 The per-day calculations are based on a 24-hour day, and, therefore, are quite conservative.

7 The Tundra B0D has potential VOC emissions of 0.55 lbs/day and 0.05 lbs/hour, and potential PM emissions of 0.50 lbs/day and 0.05 lbs/hour.

8 The Tacoma LSC 90D has potential VOC emissions of 34.3 lbs/day and 2.93 lbs/hour, and potential PM emissions of 0.8 lbs/day and 0.07 lbs/hour.
2. **Particulate Matter (PM)**

   a. **Tundra B0D: Limit Vehicle Processing to Not More Than 1 Tundra Every 2 Hours**

   (1) Separate from the state “minor source” permitting exemption for spraying processes with a PTE for VOCs and PM below 100 lbs/day and 10 lbs/hour, Rhode Island regulations impose a limit on actual PM emissions from such processes known as an hourly “Allowable PM Emissions Rate”.

   (2) This rate is calculated for each individual process based on the formula:

   \[
   \text{Emission Rate (lbs/hr)} = 4.10 \times \text{(Process Weight Rate)}^{0.67}
   \]

   (3) In the case of the B0D, the Allowable PM Emissions Rate is 0.064 pounds per hour. As long as your dealership conducts the B0D in accordance with the Technical Instructions, the B0D should have PM emissions of no more than 0.047 pounds per hour, and therefore, will fall below this Allowable PM Emissions Rate.

   (4) However, this PM emissions level of 0.047 pounds per hour assumes it will take roughly 2 hours to apply both CRCs (i.e., 712AM and Noxudol 300 S) to the Tundra. If a Tundra were processed in a shorter amount of time, then the hourly PM emissions rate could be higher.

   (5) Thus, to ensure compliance with this Allowable PM Emissions Rate, **your dealership should limit vehicle processing to not more than 1 Tundra every 2 hours**

   (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:** 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:** 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.

**NOTE:** BETWEEN NOW AND DECEMBER 31, 2011, YOU MUST FOLLOW SPECIAL REQUIREMENTS ESTABLISHED FOR TACOMA LSC 90D.

b. **Tacoma LSC 90D: Limit Vehicle Processing to Not More Than 1 Tacoma Every 1 Hour**

(1) The Allowable PM Emissions Rate for the 90D process is 0.12 pounds per hour. As long as your dealership conducts the Tacoma 90D in accordance with the Technical Instructions, the 90D should have potential PM emissions of 0.068 pounds per hour, and therefore, will fall below this Allowable PM Emissions Rate.\(^9\)

(2) However, this potential PM emissions level of 0.068 pounds per hour assumes it will take roughly 1 hour to apply both CRCs (i.e., 712AM and X128T) to the Tacoma. If a Tacoma were processed in a shorter amount of time, then the hourly PM emissions rate could be higher.

(3) Thus, to ensure compliance with this Allowable PM Emissions Rate, **your dealership should limit vehicle processing to not more than 1 Tacoma every 1 hour.**

(see explanation above on how to comply with this and the Tundra processing limits)

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\(^9\) Since sending the Tacoma LSC 90D Dealer Information Package in 2009, TMS has adopted a more conservative approach to calculating the allowable PM emissions rate. Only the revised emission rates are presented here. Under either calculation you should be in compliance with this requirement if you process no more than one Tacoma per hour.
III. AIR REGULATORY REQUIREMENTS: YOUR OBLIGATIONS

As an “automobile refinishing” operation, your dealership is subject to RIDEM Regulation No. 30, which governs VOC emissions from such operations. You must therefore comply with certain housekeeping and recordkeeping requirements, as described below.

A. Facility Housekeeping:

Regulation No. 30 requires your dealerships to ensure that the following are stored in nonabsorbent, non-leaking containers: (i) fresh and used coatings, solvent, and cleaning solvent; and (ii) cloth and paper, or other absorbent applicators moistened with coatings or solvents. Such storage containers must be kept closed at all times, except when filling or emptying. Additionally, employees should handle and transfer all coatings and solvents so as to minimize spills.

B. Recordkeeping Obligations:

The Air Recordkeeping Section contains documents that you can use to demonstrate that your emissions fall below state air permitting thresholds, as well as records to demonstrate your compliance with Regulation No. 30. You must keep these records at your dealership for five (5) years beyond the date that you service the last Tundra under the B0D.

1. VOC & PM Records
   a. Regulation No. 30.5.1(b) requires that you record the volume of B0D coating used each month in any automobile refinishing operation. To demonstrate compliance with this requirement, as well as allowable PM emission requirements if any question should arise, you should use the “Rhode Island B0D and LSC 90D Production Log” in the Air Recordkeeping Section. This log is a tool for calculating actual PM emissions from the B0D and LSC 90D based on the number of Tundras and Tacomas you process on a daily basis. In addition, the number of trucks will allow for the calculation of monthly coating usage per the Regulation 30.5.1(b) requirement.

2. Annual Registration
   a. Regulation No. 30 requires that, within 45 days after the end of each calendar year, you register with the RIDEM Office of Air Resources by submitting the following information on forms supplied by RIDEM.
(1) The name and address of the facility and the name and telephone number of a responsible corporate official submitting the registration;

(2) A description of all automobile refinishing operations in the facility from which VOCs are emitted;

(3) Quantities of coatings, solvents, dissolvers, viscosity reducers, diluents, thinners, reagents, cleaning agents, enamels, lacquers, or paints consumed during the calendar year of record as a result of automobile refinishing operations; and

(4) The amount of VOCs per gallon of coating solution (lbs/gallon) for each coating, enamel, lacquer, or paint consumed at the facility as a result of automobile refinishing operations during the calendar year of record.

b. Regulation No. 30 requires you to report the above information for all automobile refinishing operations at your dealership. Thus, you should include information regarding the Tacoma LSC 90D as well as any non-B0D/LSC 90D-related refinishing operations. Since you have already been engaging in automobile refinishing operations at your dealership (i.e., the Tacoma LSC 90D), then you are presumed to be familiar with Regulation No. 30’s registration/reporting requirements, and should simply need to add the B0D to your existing compliance efforts.

c. Note, however, that even though Regulation No. 30 states that you should use RIDEM “supplied” forms, RIDEM does not presently supply a specific form for automobile refinishing operations. However, RIDEM has advised that the information required by Regulation No. 30 can be submitted on the Air Pollution Inventory Form D (for surface coating operations) – a copy of which is included in the Air Recordkeeping Section of this Guide and is also available at http://www.dem.ri.gov/pubs/forms.htm. It is recommended that you check the RIDEM website for an updated version of the form, or a new form specific to Regulation No. 30, before completing any submissions for 2011.

3. Other Records

You records also must include copies of:

a. An Explanation of B0D & LSC 90D Emission Calculations; and

b. The letter from RIDEM, dated September 13, 2011, approving use of the Vaupel HSDR 3300 spray guns pursuant to Regulation No. 30.4.1(c); and
c. The letter from RIDEM, dated September 14, 2011, confirming that the B0D does not require air permits under Regulation No. 9.3.1; and

d. B0D equipment manufacturer’s specifications; and

e. The Material Safety Data Sheets for the B0D Materials.

We have provided copies of these documents in the Air Recordkeeping 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 for five (5) years the documents and records listed below to confirm that the B0D is exempt from air permitting and that your dealership is complying with Regulation No. 30:

1. Records of total B0D and LSC 90D emissions production (use attached “Rhode Island B0D and LSC 90D Production Log”); and

2. Air Pollution Inventory Form D (for RIDEM Regulation No. 30 annual registration requirement); and

3. An Explanation of B0D & LSC 90D Emission Calculations; and

4. The letter from RIDEM, dated September 13, 2011, approving use of the Vaupel HSDR 3300 spray guns pursuant to Regulation No. 30.4.1(c); and

5. The letter from RIDEM, dated September 14, 2011, confirming that the B0D does not require air permits under Regulation No. 9.3.1; and

6. B0D equipment manufacturer’s specifications; and

7. Material Safety Data Sheets (MSDSs) for the B0D materials (NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements).

Notes:

I. You do not need to do anything with items (3) through (7) above. You should simply keep those documents in your files. You will only need to provide them if requested by a government agency.

II. You must keep these records for five (5) years. A failure to do so could subject you to penalties and fines. Since the B0D has no end date, you should keep the records for five years after the date you treat the last Tundra under the B0D.

III. A 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 and coating usage.
Rhode Island 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.

*Return to Table of Contents*
Rhode Island B0D and LSC 90D Production Log

Reporting Year: ____  Dealership name: ________________________________

Each Tacoma truck requires 2 liters of 712AM (0.165 lbs/gal of VOC) and 3 liters of X128T (3.5 lbs/gal of VOC). Each Tundra truck requires 1 liter of 712AM and 3 liters of Noxudol 300 S (0.09 lbs/gal of VOC). If there are any questions or compliance issues, please call the EH&S Hotline (877-572-4347).

<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></td>
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</tbody>
</table>

IMPORTANT DOCUMENT

This record must be maintained for 5 years. Duplicate as necessary.
(This page intentionally left blank.)
Rhode Island B0D and LSC 90D Emissions Estimator

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 Rhode Island 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, determine the number of Tundra and Tacoma trucks processed that day.

2. Use the table below to estimate the amount of regulated air emissions emitted as a result of B0D and LSC 90D operations that day.
   - Find the number of Tundras processed in the B0D in the columns across the top of the table, and then find the number of Tacomas processed in the LSC 90D in the rows down the left-hand side of the table.
   - The intersection of the B0D column and LSC 90D row provides the emissions estimate (in pounds per day – lbs/day) for two regulated compounds found in the B0D and LSC 90D materials - Volatile Organic Compounds (VOC) and Particulate Matter (PM).
   - For example, if you processed one Tundra and two Tacomas in a day, the estimate of emissions is: VOC = 5.83 lbs/day; PM = 0.24 lbs/day.

3. For each of the two regulated compounds, copy the emissions estimate into the column for that compound in the Rhode Island 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></td>
<td>VOC</td>
<td>PM</td>
<td>VOC</td>
<td>PM</td>
<td>VOC</td>
</tr>
<tr>
<td>0</td>
<td>0.11</td>
<td>0.00</td>
<td>0.22</td>
<td>0.20</td>
<td>0.33</td>
</tr>
<tr>
<td>1</td>
<td>2.86</td>
<td>0.07</td>
<td>2.97</td>
<td>0.27</td>
<td>3.08</td>
</tr>
<tr>
<td>2</td>
<td>5.72</td>
<td>0.14</td>
<td>5.83</td>
<td>0.34</td>
<td>5.94</td>
</tr>
<tr>
<td>3</td>
<td>8.58</td>
<td>0.21</td>
<td>8.69</td>
<td>0.41</td>
<td>8.80</td>
</tr>
<tr>
<td>4</td>
<td>11.44</td>
<td>0.28</td>
<td>11.55</td>
<td>0.38</td>
<td>11.66</td>
</tr>
<tr>
<td>5</td>
<td>14.30</td>
<td>0.35</td>
<td>14.41</td>
<td>0.45</td>
<td>14.52</td>
</tr>
<tr>
<td>6</td>
<td>17.16</td>
<td>0.42</td>
<td>17.27</td>
<td>0.52</td>
<td>17.38</td>
</tr>
</tbody>
</table>

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(This page intentionally left blank.)
EXPLANATION OF B0D & LSC 90D EMISSION CALCULATIONS

TO:  ALL TOYOTA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS
DATE:  2011
SUBJECT:  TUNDRA B0D & TACOMA LSC 90D POTENTIAL EMISSION CALCULATIONS – RHODE ISLAND

As noted above, you can conduct the Tundra B0D and continue to stay below air permitting thresholds as long as you conduct it in an existing area at your dealership. The Rhode Island Department of Environmental Management (RIDEM) has determined that the Tundra B0D and Tacoma LSC 90D conducted at your dealership do not require state air permits (see the letter from RIDEM attached to the Air Recordkeeping Section). This determination is based on the maximum potential emissions of air contaminants from the Tundra B0D as described in this memo such that aggregate emissions from the Tundra B0D and Tacoma LSC 90D will not equal or exceed the permitting thresholds of 100 lbs/day or 10 lbs/hour.

It has been determined that the maximum projected actual emissions at dealerships implementing the Tundra B0D and Tacoma LSC 90D in Rhode Island, based on the operational constraint of servicing trucks for a maximum of 12 hours per day (i.e., 5 Tundra trucks and 12 Tacoma trucks), will be:

For Tundra B0D:
- Daily emissions of 1.05 lbs/day (0.55 lbs/day Volatile Organic Compounds (VOCs) and 0.5 lbs/day Particulate Matter (PM))
- Hourly emissions of 0.1 lbs/hour (0.05 lbs/hour VOCs and 0.05 lbs/hour PM)

For Tacoma LSC 90D:
- Daily emissions of 35.1 lbs/day (34.3 lbs/day VOCs and 0.8 lbs/day PM)
- Hourly emissions of 3.00 lbs/day (2.93 lbs/hour VOCs and 0.07 lbs/hour PM)

In addition to the emissions of the contaminants above, it should be noted that neither the Tundra B0D nor the Tacoma LSC 90D will result in the emission of any federally listed hazardous air pollutants (HAPs), Sulfur Dioxide (SO₂), Nitrogen Oxides (NOₓ) or Lead, and therefore the potential emissions for those contaminants is zero.

If there are any questions regarding the Tundra B0D or Tacoma LSC 90D’s PTE or if you would like additional information, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).
RIDEM Regulation No. 30 Annual Registration – Air Pollution Inventory Form

RIDEM Regulation No. 30 requires that, within 45 days after the end of each calendar year, you submit an annual registration for any automobile refinishing operation on the forms provided by the Department. Since RIDEM has not yet developed a form specific to Regulation No. 30, RIDEM has advised that the information required by Regulation No. 30 can be submitted on the attached Air Pollution Inventory Form D (for surface coating operations). Attached here are the following:

1. RIDEM’s “Surface Coaters and Printers Basic Sample Spreadsheet,” which provides additional instructions and examples on how to complete the Air Pollution Inventory Form D; and
2. A copy of Air Pollution Inventory Form D.

NOTE: The attached documents are 2010 versions of Air Pollution Inventory Form D. Prior to completing these forms for 2011, you should check the RIDEM website (http://www.dem.ri.gov/pubs/forms.htm) for any updated Form D and/or instructions, or for a new form specific to Regulation No. 30.

Completed forms should be submitted to the following address (or any updated address noted by RIDEM):

Air Pollution/Toxics Inventory
Office of Air Resources
235 Promenade Street
Providence, RI 02908-5767
Check off the appropriate boxes so that proper air pollution estimates can be made. Organize your data to try to optimize data quality.

- No. of Bulk Storage Tanks for VOCs other than fuel oil ______
- Mixing Room personnel mix formulations to our own specifications
- Mixing Room personnel merely stir formulations already in drums
- Mixing Room has general ventilation and/or floor sweeps
- Mixing Room has all VOC emissions vented to air pollution control equipment

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Contact</th>
<th>Phone</th>
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For each VOC control device utilized by your facility, report the following data:

<table>
<thead>
<tr>
<th>RI DEM Approval No.</th>
<th># days operated June - August, 2010</th>
<th># days operated all other months, 2010</th>
<th># days by-passed June - August, 2010</th>
<th># days by-passed all other months, 2010</th>
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</table>

Return to: Air Pollution/Toxics Inventory, Office of Air Resources 235 Promenade Street, Providence, RI 02908-5767
### Surface Coaters and Printers Basic Spreadsheet

**Weight % Data**

<table>
<thead>
<tr>
<th>Facility Name:</th>
<th>Substrate for Formulations on this Spreadsheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Solvent Names in Alphabetical Order with CAS No.</td>
</tr>
</tbody>
</table>

These should add up to 100%.

<table>
<thead>
<tr>
<th>2010 AMOUNT USED (GALS)</th>
<th>PERCENT SOLIDS (WT %)</th>
<th>TOTAL VOC (WT %)</th>
<th>1 GALLON WEIGHT OF VOCs (LBS.)</th>
<th>CALCUATED TOTAL VOCs (LBS.)</th>
<th>SOLVENT NAME</th>
<th>CAS No. (WT %)</th>
<th>(WT %)</th>
<th>(WT %)</th>
<th>(WT %)</th>
<th>(WT %)</th>
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</tbody>
</table>

**Waste Coating(s), Ink(s), Formulation(s) Disposal:**

TOTAL VOC (LBS):

Note: Misc. VOCs include

---

Return to: Air Pollution/Toxics Inventory, Office of Air Resources
235 Promenade Street, Providence, RI 02908-5767
### Surface Coaters and Printers Basic Sample Spreadsheet

Weight % Data

<table>
<thead>
<tr>
<th>Facility Name: Protection Metalcoat</th>
<th>Substrate for Formulations on this Spreadsheet: METAL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>These should add &lt;&lt; up to 100% &gt;&gt;</strong></td>
<td><strong>Solvent Names Continue in Alphabetical Order with CAS No. &gt;&gt;&gt;&gt;&gt;</strong></td>
</tr>
<tr>
<td><strong>CALCULATED</strong></td>
<td><strong>TOLUENE</strong></td>
</tr>
<tr>
<td><strong>FORMULATION NAME</strong></td>
<td><strong>(GALS.)</strong></td>
</tr>
<tr>
<td>BerryPrime 42a</td>
<td>255</td>
</tr>
<tr>
<td>MEK Thinner added</td>
<td>10</td>
</tr>
<tr>
<td>Metallic Primer 4018</td>
<td>690</td>
</tr>
<tr>
<td>Thinner added, METALWASH</td>
<td>55</td>
</tr>
<tr>
<td>Waste Coating(s), Ink(s) or Formulation(s) Disposed**</td>
<td>55</td>
</tr>
</tbody>
</table>

**TOTAL VOC (lbs):** 5473.74 including acetone

---

Note: Misc. VOCs include isopropyl acetate (CAS 108214) and methyl amyl ketone (CAS 110530) only.

- **Total VOCs can be calculated with this equation:** (amount of coating used (gals) x weight of 1 gallon (lbs)) x (total VOC weight % / 100)

**Please provide chemical analysis of the waste coating/ink/formulation if available.

- Please indicate if water is included in the coating/ink/formulation. If there are many water-based formulations, add a column in your spreadsheet for % water.

- On a separate sheet, please provide a list of any air pollution control equipment for the coating or printing process and the capture and destruction efficiencies of the equipment.

**Acetone may be included in order to show a full accounting of the formulation. Operating Permit fees, if applicable, will not be assessed on delisted chemicals.
Rhode Island Department of Environmental Management
2010 Air Pollution Inventory
Supplemental Chemical Use Survey

Facility Name

Signature of Person Completing Form

Date

Note: Report only those substances used at the facility which have not been reported on the Surface Coating/Printing/Formulation Use Spreadsheet.

<table>
<thead>
<tr>
<th>VOC or Regulated Substance Name &amp; CAS Number</th>
<th>CAS:</th>
<th>CAS:</th>
<th>CAS:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of Operation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Starting Inventory* (1/1/2010)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Amount Purchased in 2010</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ending Inventory* (12/31/2010)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Amount Manifested and % of that manifested waste which was the Regulated Substance*</td>
<td>%</td>
<td>%</td>
<td>%</td>
</tr>
<tr>
<td>Amount of Substance Released to Air</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Pollution Control Equipment and Approval No.</td>
<td>Type:</td>
<td>Type:</td>
<td>Type:</td>
</tr>
<tr>
<td></td>
<td>Appr. No.:</td>
<td>Appr. No.:</td>
<td>Appr. No.:</td>
</tr>
<tr>
<td>Capture Efficiency (Percent)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall Efficiency (Percent)</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

*If known (attach additional sheets if necessary)

Return to: Air Pollution/Toxics Inventory, Office of Air Resources, 235 Promenade Street, Providence, RI 02908-5767

Air Pollution Inventory Form D, Page 3
Instructions for Supplemental Chemical Use Survey

*Regulated Substance* - List all Volatile Organic Compounds (VOC) and all chemicals listed on the list entitled “Listed Toxic Air Contaminants” that were used at and/or emitted from the facility. Provide a CAS number, usually available on your MSDS. **Please note that all miscellaneous volatile organic compounds (VOCs) used in excess of 100 pounds must be reported even if the name is not specifically listed on the Listed Toxic Air Contaminants List.**

*Type of Operation* - Describe the process in which the listed substance was used (for example, degreasing, plating, wipe cleaning, etc.).

*Starting Inventory* - Report the amount of the substance present on site at the start of the year, if known. State whether the amount is given in pounds or gallons. Please provide data in pounds if possible.

*Amount Purchased* - Report the amount of the substance purchased in 2010 and indicate whether the number given is in pounds or gallons. Again, provide data in pounds if possible.

*Ending Inventory* - Report the amount of the substance present on site at the end of the year, if known. State whether the amount is given in pounds or gallons.

*Amount Manifested* - Report the amount (in pounds) of the regulated substance which was manifested as hazardous waste and the percentage of that waste that was this chemical.

*Amount of Substance Released to Air* - Calculate the amount of the substance emitted to air. Include both fugitive and stack emissions. **Attach documentation of the calculations used.** You may find it necessary to make other mass balance adjustments such as an amount disposed in a landfill or discharged to a POTW. Label carefully.

*Describe Air Pollution Control Equipment* - Provide a short description of the equipment used to control emissions of the regulated substance, if any. Examples follow:

Type: Carbon adsorber, venturi scrubber, VOC incinerator, baghouse, etc.
Include RI DEM Approval Number, if known.

Capture: Give the capture efficiency for this chemical.

Overall: Give the overall control efficiency of the control equipment for this chemical.
Overall Efficiency = Capture Efficiency x Destruction or Recovery Efficiency

*Note:* On a separate sheet, please provide any additional information pertinent to your processes or air pollution control equipment that will assist us in calculating an accurate emissions estimate from your facility for 2010.

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14 September 2011

Robin L. Main
Hinckley, Allen & Snyder LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903-2393

RE: Toyota Motor Sales, U.S.A., Inc.

Dear Ms. Main:

This letter serves to acknowledge receipt of your 9 August 2011 email on behalf of your client, Toyota Motor Sales, U.S.A., Inc., to the Office of Air Resources concerning the applicability of air pollution control permitting for the Toyota Service Campaign. Your letter provided information pertaining to the operation and potential emissions generated during the Service Campaign to be conducted at various Toyota dealerships located in Rhode Island.

Based on the information provided in your letter, the quantity of air contaminants emitted from the Service Campaign as described in your letter would be below the regulatory thresholds of those listed in Air Pollution Control (APC) Regulation No. 9 entitled “Air Pollution Control Permits”, Subsection 9.3.1. Therefore, if the Service Campaign is designed, constructed and operated consistent with the representations in your 9 August 2011 letter, a permit under APC Regulation No. 9 is not required.

If in the future, Toyota conducts other Service Campaigns that are below the regulatory thresholds for permitting as those listed in under Subsection 9.3.1, a permit under APC Regulation No. 9 will not be required. Toyota is not required to notify this office of future Service Campaigns if Toyota determines that regulatory permitting thresholds will not be exceeded.

This letter does not relieve the Toyota Motor Sales, U.S.A., Inc. from compliance with any applicable state and federal air pollution control rules and regulations.

Should you have any further questions I may be reached at 401-222-2808, extension 7110.

Sincerely,

[Signature]

Ruth A. Gold
Principal Air Quality Specialist
Office of Air Resources
September 13, 2011

Robin L. Main
Hinckley, Allen, Snyder, LLP.
50 Kennedy Plaza
Suite 1500
Providence, RI 02903-2319

Dear Ms. Main:


The Rhode Island Department of Environmental Management’s Office of Air Resources (OAR) has reviewed the information submitted by Hinckley, Allen, Snyder, LLP, on behalf of Toyota Motor Sales U.S.A., Inc., for the use of the Vaupel HSDR 3300 spray gun in applying Auson Naxudol 300 S and Parker 712 AM corrosion resistant compounds to the exterior and interior of the frames of certain Toyota vehicles. Air Pollution Control Regulation No. 30 “Control of Volatile Organic Compounds from Automobile Refinishing Operations”, specifically section 30.4 Equipment Specifications, requires that persons engaging in automobile refinishing, specifically the application of coatings with a spray gun, utilize … electrostatic application equipment (30.4.1(a)) … High Volume Low Pressure (HVLP) spray equipment (30.4.1(b)), or … another type of application which achieves a transfer efficiency of at least 65% and has been approved by the Director (39.4.1(c)). Based on the review of the information submitted the OAR has determined that the Vaupel HSDR 3300 spray gun achieves an equivalent or greater transfer efficiency than 65% when used in applying the corrosion resistant compounds as described in the submittal. Therefore the use of the Vaupel HSDR 3300 spray gun is approved by the Director for its use in applying corrosion resistant compounds when used as follows:

1. The Vaupel HSDR 3300 spray gun is only approved for the application of corrosion resistant compounds, as described in the submittal with attachments dated August 5, 2011, in automobile refinishing facilities in RI.

2. This approval is only valid if the air pressure supplied to the Vaupel HSDR 3300 spray gun is equal to or less than 52 psig when applying the Auson Naxudol 300
S coating and equal to or less than 75 psig when applying the Parker 712 AM coating.

3. This approval is only valid if during actual operation the Vaupel HSDR 3300 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.

4. The Vaupel HSDR 3300 spray gun shall be equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand when applying the corrosion resistant compounds. The Auson Noxudol 300 S protective coating shall only be applied to the exterior of the frame rails. The Parker 712 AM 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 8 inches.

5. This approval is only valid for the Vaupel HSDR 3300 spray gun model operated under the same conditions as it was tested.

If you have any questions regarding this approval, please call me at (401) 222-2808 ext. 7013 or send me an e-mail at ted.burns@dem.ri.gov.

Sincerely,

Edward Burns, Supervising Air Quality Specialist
RIDEM, Office of Air Resources

cc: Ronald Gagnon, Chief, RIDEM, Office of Customer and Technical Assistance
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.
- Working areas must be brightly lit, well ventilated and must conform to applicable health and work safety regulations.
- 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

1 10 2919 001  gun body
2 50 3909 005  trigger
3 30 1102 006  trigger axle
4 60 3100 029  clamping ring
5 83010  nozzle needle, cpl.
6 60 3104 007  spring f. nozzle needle
7 30 1122 005  stop screw
8 30 1104 008  valve bolt
9 60 4100 027  o-ring 1.5x0.75
10 40 4101 011  valve seal
11 60 3105 003  spring f. valve
12 60 4100 062  o-ring 8x1
13 30 1120 002  locking screw
14  ------------
15 40 4100 003  needle seal, teflon
16 60 4100 064  o-ring 5x1
17 30 1422 016  needle stuffing box
18 60 4100 066  o-ring 8x2.5
19 30 2122 005  spray nozzle
20 20 1413 001  quick coupling
21  Capity hose-spray-set
22 60 4100 071  o-ring 15x2
23 40 4104 014  adaptor 3000
25 60 4100 072  o-ring 33x2
26 10 2111 014  pressure tank filler cap
27 60 4100 044  V-packing
28 60 4100 087  o-ring 35x4
29  ------------
30 8302  assembly screw
31 60 3129 014  ascending tube
32 83305  pressure tank
33 83303  seal-set
34 80151  flat-nozzle – plug connection

This gun may only be used for pressure containers which treads have a slot.
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

<table>
<thead>
<tr>
<th></th>
<th>HEALTH</th>
<th>FIRE</th>
<th>REACTIVITY</th>
<th>PERSONAL PROTECTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>HEALTH</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FIRE</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>REACTIVITY</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PERSONAL PROTECTION</td>
<td></td>
<td></td>
<td></td>
<td>B</td>
</tr>
</tbody>
</table>

Date of Review:   Revised:  March 17, 2011
Date of Preparation:  November 14, 2007
By: Y.Yamada

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 heavy paraffinic</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³</td>
</tr>
<tr>
<td>CAS #64742-65-0</td>
<td></td>
<td>OSHA PEL: 5 mg/m³</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>

Return to Table of Contents
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/m^3 (respirable fraction)
OSHA PEL: 15 mg/m^3 (total dust)
ACGIH TLV: 10 mg/m^3 ([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
Verkstadsgatan 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
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</td>
<td>20-30%</td>
<td>68783-96-0</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>hydroxide and calcium carbonate dispersion</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fatty acids, tall-oil, polymers with isophthalic</td>
<td>10-20%</td>
<td>68410-37-7</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>acid, pentaerythritol and tall oil</td>
<td></td>
<td></td>
<td></td>
<td></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>
<th>mg/m³</th>
<th>OSHA PEL-TWA</th>
<th>OSHA PEL STEL</th>
<th>OSHA PEL CEILING</th>
<th>ACGIH TLV-TWA</th>
<th>ACGIH TLV STEL</th>
<th>ACGIH TLV CEILING</th>
</tr>
</thead>
<tbody>
<tr>
<td>64741-88-4</td>
<td>Solvent-refined heavy paraffinic distillate</td>
<td>5</td>
<td>5</td>
<td>none</td>
<td>none</td>
<td>5</td>
<td>none</td>
<td>none</td>
</tr>
<tr>
<td>68783-96-0</td>
<td>PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION</td>
<td>none</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
</tr>
<tr>
<td>68410-37-7</td>
<td>FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL</td>
<td>none</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
</tr>
<tr>
<td>8002-74-2</td>
<td>PARAFFIN AND HYDROCARBON WAXES</td>
<td>none</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>2 (FUME)</td>
<td>NONE</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:  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>

Return to Table of Contents
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 79).

**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 Tundra B0D until you have received his approval to do so. **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 B0D.**

i. **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 79) to see whether it has any additional building, zoning, or other requirements applicable to the CRC program and contact your local officials as indicated.

*(Go to next page for summary of applicable State requirements.)*
I. SUMMARY OF APPLICABLE STATE REQUIREMENTS

I. FIRE CODE

i. The B0D should not require a state fire permit under the Rhode Island Fire Safety Code (Fire Code) and Appendix A contains a Determination of Compliance that the B0D complies with the Fire Code (or locally adopted fire codes, as appropriate) 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. 79) 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. 79) 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.

ii. 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:

1. Adequate ventilation in the area where the B0D will be conducted; and
2. No open flames or spark-producing equipment within 20 ft of the B0D operations; and
3. No drying, curing, or fusion apparatus within 20 ft of the B0D operations; and
4. No solvents used for cleaning procedures with a flash point below 100°F. (Note: the B0D will not require any cleaning procedures that require solvents with flash point(s) below 100°F.); and
5. The materials applied to the truck frame include only Class IIIB liquids and do not include any organic peroxide catalyst11 (Note: Each of the

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10 Rhode Island has adopted the National Fire Protection Association’s Uniform Fire Code – NFPA 1 (2003 ed.). For those Rhode Island dealerships subject to an additional fire code or different version of NFPA 1 (as identified in Table 1), conformance to the requirements outlined above will ensure compliance with your locally adopted fire code.

11 Among other requirements, in order to conduct the B0D consistent with the Rhode Island Fire Safety Code, the materials sprayed must meet at least one (1) of the following criteria: (1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids; (2) Not contain any solvent or component that
B0D’s CRC materials that you are being provided – interior and exterior - satisfy this requirement); and

6. Fire extinguishers be provided in the vicinity of the B0D operation (Note: fire extinguishers must be rated “B”, “AB”, or “ABC”).

**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](http://cleandealer.com)) or call the EH&S Hotline (877-572-4347).

iii. Both CRC materials are considered Class IIIB combustible liquids 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 consistently with the guidelines below:

1. **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

2. **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.
   a. A single fire cabinet may hold up to 120 gallons.
   b. 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 level does not require an operational permit in your locality.

*(Go to Next Page for Building Code Discussion)*
II. BUILDING CODE\textsuperscript{13}

i. The B0D should not require a building permit under the Rhode Island 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 79.\textsuperscript{14}

<table>
<thead>
<tr>
<th>Regulatory Note: It is assumed that your dealership:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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</td>
</tr>
<tr>
<td>(ii) does not require any building, electrical, gas, plumbing or mechanical system modifications for the B0D.</td>
</tr>
</tbody>
</table>

If these assumptions do not apply, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347)

2. 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 79), 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). |


\textsuperscript{14} 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.
**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 Rhode Island Locations

<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Jurisdiction</th>
<th>Other Potentially Relevant Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rhode Island (State)</td>
<td>Note: Rhode Island State Fire Safety Code=NFPA Jurisdiction</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Robert J. Martin, Chief Bristol Fire Department PO Box 775 Bristol, RI 02809 (401) 253-6912</td>
<td>Please submit 4 copies of the materials at Appendix A to your local fire official. You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit; otherwise additional zoning requirements may apply (e.g., material storage requirements, State hazardous waste registration, training requirements, etc.).</td>
</tr>
<tr>
<td></td>
<td>Edward M. Tanner Principal Planner/Zoning Officer 10 Court Street Bristol, RI 02809 (401) 253-7000</td>
<td></td>
</tr>
<tr>
<td>Bristol-</td>
<td>Robert J. Martin, Chief Bristol Fire Department PO Box 775 Bristol, RI 02809 (401) 253-6912</td>
<td></td>
</tr>
<tr>
<td>BRISTOL TOYOTA, INC.</td>
<td>NFPA Jurisdiction – Adopts the 2003 NFPA-1 code. Materials to contact local fire official are found in Appendix A.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Edward M. Tanner Principal Planner/Zoning Officer 10 Court Street Bristol, RI 02809 (401) 253-7000</td>
<td></td>
</tr>
<tr>
<td>East Providence-</td>
<td>Capt. Oscar M. Elmasian, Deputy State Fire Marshal Fire Prevention Bureau 913 Broadway East Providence, RI 02914 (401) 435-7681</td>
<td>Please submit 4 copies of the materials at Appendix A to your local fire official. After submission of the materials at Appendix A, your local fire marshal may require your dealership to submit a building permit application for the B0D, and may require your dealership to obtain a Hazardous Materials permit (or update existing permit) as a result of the B0D. While B0D only waste is not considered hazardous, combined B0D and LSC90D waste needs to be managed as hazardous. Please refer to the Hazardous Waste section of this Dealer Package to determine if your handling of B0D waste would trigger additional requirements under this section.</td>
</tr>
<tr>
<td>FOX TOYOTA</td>
<td>Edward M. Tanner Principal Planner/Zoning Officer 10 Court Street Bristol, RI 02809 (401) 253-7000</td>
<td></td>
</tr>
</tbody>
</table>

15 Even though East Providence has adopted the State Fire Code, its published code still indicates that the code in force is the BOCA code. Since the NFPA’s requirements for the LSC are as or more stringent than the BOCA codes, compliance with the NFPA should satisfy any BOCA requirements.
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Jurisdiction</th>
<th>Other Potentially Relevant Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>NFPA Jurisdiction</strong> - Adopts the State fire code. Materials to contact local fire official are found in Appendix A.²⁵</td>
<td>Dealership should verify that the B0D will not constitute a change in use or impermissible use under its zoning permit.</td>
</tr>
</tbody>
</table>
|                             | **Contact**                                                                                                             | Edward Pimentel, AICP  
City of East Providence  
East Providence, RI 02914  
401-435-7720                                                                                                                                                                                                                   |
|                             | **Dealership should verify whether or not the location where it will conduct the B0D is located within a Zone Water Protection District or a Special Flood Hazard Area and comply with any additional requirements that may apply.** | Local regulations require you to remove from your facility each day combustible waste materials (which could include the B0D waste materials) or store such materials in a metal or metal lined covered receptacle or bin.  
Dealership should verify that the B0D will not constitute a change in use or impermissible use under its zoning permit.                                                                                                  |
|                             | **Contact**                                                                                                             | Jack Kane  
Building Official/Zoning Official  
350 East Main Road  
Middletown, Rhode Island 02842  
(401) 847-5769                                                                                                                                                                                                              |
<p>|                             | <strong>You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.</strong>       |                                                                                                                                                                                                                                                                                        |
|                             | <strong>Contact</strong>                                                                                                             | Planning Department.                                                                                                                                                                                                                                                                  |</p>
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Jurisdiction</th>
<th>Other Potentially Relevant Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smithfield-</td>
<td>(401) 294-3346 x 7208 NFPA Jurisdiction – Materials to contact local fire official are found in Appendix A based on state fire code.</td>
<td>Please submit 3 copies of the materials at Appendix A to your local fire official.</td>
</tr>
<tr>
<td>COLONIAL TOYOTA</td>
<td>55 Brown Street North Kingstown, RI 02852 (401) 294-3331.</td>
<td>Reminder: Local codes require that all automobile repairs be conducted inside an enclosed building. Dealership should verify that the BOD will not constitute a change in use or impermissible use under its zoning permit.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td>Capt. James Waterman II, Fire Prevention Officer Smithfield Fire Department 607 Putnam Pike Smithfield, RI 02828 (401) 949-0832</td>
<td>Peter Scorpio Town of Smithfield Building and Zoning Department 64 Farnum Pike Smithfield, RI 02917 401-233-1039</td>
</tr>
<tr>
<td>Warwick-</td>
<td>Arthur Lowe, Fire Marshal Warwick Fire Department 111 Veterans</td>
<td>Dealership should verify that the BOD will not constitute a change in use or impermissible use under its zoning permit.</td>
</tr>
<tr>
<td>BALISE TOYOTA</td>
<td></td>
<td>Contact</td>
</tr>
</tbody>
</table>

16 Smithfield, RI municipal code still identifies the AIA fire code (which was superseded by BOCA code) as the code in effect in Smithfield. However, interviews with the local fire marshal indicate that the State Fire Code is the one that is enforced. Since the NFPA’s requirements or the LSC are as or more stringent than the AIA code, compliance with the NFPA should satisfy any AIA requirements.
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official and Fire Code Jurisdiction</th>
<th>Other Potentially Relevant Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Memorial Drive</strong></td>
<td>Warwick, RI 02886</td>
<td>Mark Carruolo, Director</td>
</tr>
<tr>
<td></td>
<td>(401) 468-4045</td>
<td>Planning Department</td>
</tr>
<tr>
<td></td>
<td>Warwick City Hall</td>
<td>Annex Building 2nd Floor</td>
</tr>
<tr>
<td></td>
<td>3275 Post Road</td>
<td>Warwick, RI 02886</td>
</tr>
<tr>
<td></td>
<td>Zoning (401) 738-2000 x6294</td>
<td></td>
</tr>
<tr>
<td><strong>NFPA Jurisdiction</strong></td>
<td>Adopts the 2003 NFPA-1 code.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Materials to contact local fire official are found in Appendix A.</td>
<td></td>
</tr>
<tr>
<td><strong>Westerly</strong></td>
<td>David Sayles, Chief</td>
<td>Westerly requires you to obtain permit from the fire marshal for spraying operations like the B0D. Submit the materials at Appendix A to indicate your intent to use the permit already issued for the LSC 90D. It is possible, however, that your fire code enforcement official may request that you not proceed with the Tundra B0D until the official can review your situation. If this occurs, please work with your official and do not proceed with B0D until you have received his approval to do so. Dealership should verify that the B0D will not constitute a change in use or impermissible use under its zoning permit.</td>
</tr>
<tr>
<td></td>
<td>Westerly Fire Department</td>
<td>Contact</td>
</tr>
<tr>
<td></td>
<td>7 Union Street</td>
<td>Elizabeth Rasmussen</td>
</tr>
<tr>
<td></td>
<td>Westerly, RI 02891</td>
<td>Zoning Official</td>
</tr>
<tr>
<td></td>
<td>(401) 596-0402</td>
<td>Westerly Planning Department</td>
</tr>
<tr>
<td></td>
<td></td>
<td>45 Broad St.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Westerly, RI 02818</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(401) 348-2551</td>
</tr>
</tbody>
</table>
APPENDIX A

Materials to Demonstrate Compliance with the Rhode Island State and Local Fire Code Requirements

Compliance Information &

Materials to submit to the Appropriate Fire Code Enforcement Official
- Model Letter
- C3 Compliance Determination with the Rhode Island Fire Safety 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)
(This page intentionally left blank.)
Appendix A1: Rhode Island NFPA Jurisdictions-
Summary of Fire Code Requirements

Your local jurisdiction is subject to the Rhode Island Fire Safety Code (which adopts the 2003 edition of the NFPA 1 and 2000 edition of NFPA 33) or a locally adopted version of those codes.

- **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 Rhode Island Fire Safety 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)*.

- **You should do the following:**
  
  o 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 79.)*
  
  o 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.

  o **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 consider calling 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 for Jurisdictions Subject to the Rhode Island Fire Safety Code, Determination of Compliance and Attached Representative Process Description and MSDSs

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 (Nox-Rust® 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 Rhode Island Fire Safety 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
- Dealer 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 Rhode Island Fire Safety Code

Thank you for engaging Commercial Construction Consulting, Inc. (“C3”) to determine compliance with applicable Rhode Island fire code regulations in advance of Toyota’s 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 based on the 2003 version of NFPA 1 (this standard in turn references NFPA 33 (2000) for spraying of flammable and combustible materials), which has been adopted in part as the fire code in the State of Rhode Island.

We understand that the CRC program is substantially similar to the Tacoma Limited Service Campaign 90D (LSC 90D) that Toyota’s Wisconsin 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 IIIIB combustible liquid to the underside of certain Toyota vehicles, the new CRC program will use the same (or a similar) Class IIIIB combustible liquid for application to the interior of the frame, but will substitute a less combustible, Class IIIIB liquid for the Class II liquid for application to the exterior of the frame. Thus, the new CRC program uses only Class IIIIB combustible liquids. We further understand that the LSC 90D will conclude after December 31, 2011, and therefore, that Wisconsin 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 NFPA 33. 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 requirements of the NFPA 33’s vehicle undercoating exemption, then the CRC program continues to qualify for the exemption in NFPA 33, Section 12.1, paragraph 12.1.1 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.

Regulatory Analysis

NFPA 33

NFPA 33, Section 12.1 notes that vehicle spray undercoating operations conducted in an area with adequate ventilation are exempt from the provisions of NFPA 33 if certain requirements are met:
Regulation: Section 12.1 (Automobile Undercoating and Body Lining):

12.1.1: Spray undercoating or spray body lining of vehicles that is conducted in an area that has adequate natural or mechanical ventilation shall be exempt from the provisions of this standard, if all of the requirements of 12.1.1.1 through 12.1.1.4 are met.

12.1.1.1: There shall be no open flames or spark-producing equipment within 20 ft (6100 mm) of the spray operation while the spray operation is being conducted.

12.1.1.2: There shall be no drying, curing, or fusion apparatus in use within 20 ft (6100 mm) of the spray operation while the spray operation is being conducted.

12.1.1.3: Any solvent used for cleaning procedures shall have a flash point not less than 100°F (37.8°C).

12.1.1.4: The coating or lining materials used shall meet one of the following criteria:
   1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids
   2) Not contain any solvent or component that has a flash point below 100°F (37.8°C)
   3) Consist only of Class IIIB liquids and not include any organic peroxide catalyst

Analysis: The CRC program meets the requirements in paragraph 12.1.1 and therefore qualifies for the undercoating exemption in NFPA 33: 1) Both materials to be used are Class IIIB; 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 Rhode Island Fire Safety Code’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 for an exemption under NFPA 33 Section 12.1. We recommend that the dealer obtain approval from the local fire official if it chooses 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
**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.
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 heavy paraffinic</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³</td>
</tr>
<tr>
<td>CAS #64742-65-0</td>
<td></td>
<td>OSHA PEL: 5 mg/m³</td>
</tr>
<tr>
<td>Sulfonic acids, petroleum, calcium salts, overbased</td>
<td>5-15</td>
<td>ACGIH TLV: 5 mg/m³ (oil mist)</td>
</tr>
<tr>
<td>CAS #68783-96-0</td>
<td></td>
<td>OSHA PEL: 5 mg/m³ (oil mist)</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 compound modified</td>
<td>0.3-1.0</td>
<td>Not established</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  
Verkstadsgatan 3  
S-434 42 Kungsbacka  
Sweden  
www.auson.se  
PHONE: +46 300-562000  
FAX: +46 300-562001

US Distributor: Soken Trade Corporation  
12055 Sherman Way  
North Hollywood, CA  
USA  
www.noxudolusa.com  
PHONE: (800) 598-3535  
FAX: (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

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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>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OSHA PEL-TWA</th>
<th>mg/m3</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td></td>
</tr>
</tbody>
</table>

| OSHA PEL STEL: | none |
| OSHA PEL CEILING: | none |
| ACGIH TLV-TWA: | 5 |
| ACGIH TLV STEL: | none |
| ACGIH TLV CEILING: | none |

<table>
<thead>
<tr>
<th>68783-96-0</th>
<th>PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION</th>
</tr>
</thead>
</table>

| OSHA PEL-TWA: | NONE |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | NONE |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

<table>
<thead>
<tr>
<th>68410-37-7</th>
<th>FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL</th>
</tr>
</thead>
</table>

| OSHA PEL-TWA: | NONE |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | NONE |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

<table>
<thead>
<tr>
<th>8002-74-2</th>
<th>PARAFFIN AND HYDROCARBON WAXES</th>
</tr>
</thead>
</table>

| OSHA PEL-TWA: | NONE |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | 2 (FUME) |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

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 D1177):** +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>
</tr>
</thead>
<tbody>
<tr>
<td>Health</td>
</tr>
<tr>
<td>Flammability</td>
</tr>
<tr>
<td>Reactivity</td>
</tr>
<tr>
<td>Personal Protection</td>
</tr>
</tbody>
</table>

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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, if, as we assume, 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 applicable to dealerships generally.

**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 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, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.
Regulatory Note Regarding B0D Tarps and Partitions: If, as we assume, the LSC 90D and B0D are conducted in a common spray space, 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 in Section 3 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. Because Rhode Island does not recognize exemptions for small quantity generators of hazardous waste, we assume you are already a registered generator with an EPA identification number, and thus are likely already familiar with the requirements noted below. The B0D will not impact your generator status (see note above).

2. If you are not a registered generator, please go to the C.L.E.A.N. Dealer website at http://cleandealer.com and select the B0D link. You may also call the EHS hotline at (877) 572-4347.

3. Store all regulated wastes in proper containers on an impervious surface, properly labeled as “hazardous waste,” and maintain required records.

4. Dispose of all regulated waste only at facilities authorized to receive “hazardous” waste using a company licensed to transport such waste to the disposal facility.

5. Remember to count used oil against your monthly hazardous waste limit if you determine it to be hazardous (for example, if it is mixed or blended with waste oil).