### TOYOTA

TO: ILLINOIS DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

**DATE: 2011** 

RE: Information Packet for Corrosion-Resistant Compound (CRC) Campaign B0D

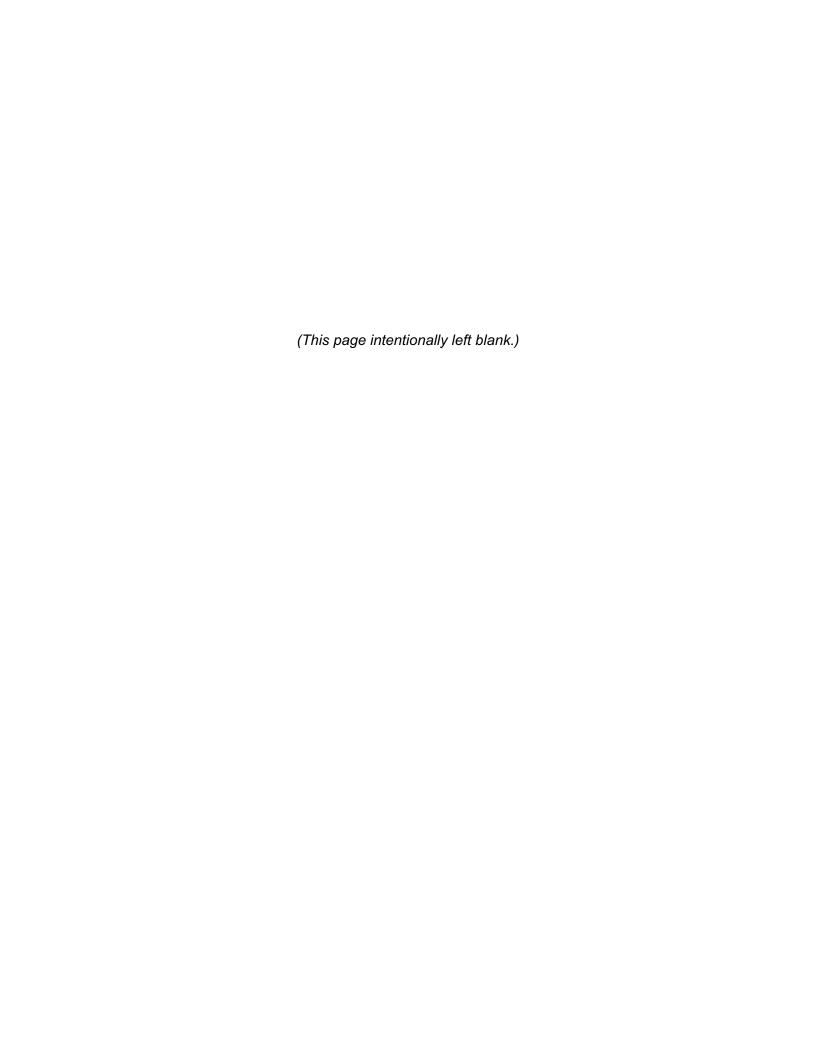
#### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

#### **ILLINOIS DEALER INFORMATION PACKET**

This bound volume contains two parts of the Illinois 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.

#### **Table of Contents**

	<u>Page</u>
ILLINOIS DEALER INFORMATION PACKET	3
GETTING STARTED GUIDE	5
STEP 1: SITE SELECTION	5
STEP 2: AIR PERMITTING EXEMPTION	5
STEP 3: CONTACT LOCAL FIRE OFFICIAL	11
STEP 4: COMPLETE B0D READINESS SURVEY	12
STEP 5: AIR RECORDKEEPING	12
STEP 6: HAZARDOUS WASTE MANAGEMENT	13
HOW TO IMPLEMENT THE B0D	15
SITE SELECTION SECTION	17
GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS	21
AIR REGULATIONS SECTION	27
AIR PERMITTING REQUIREMENTS	27
AIR REGULATORY REQUIREMENTS: UNDERSTANDING HOW THEY WILL APPLY TO YOUR DEALERSHIP	
AIR REGULATORY REQUIREMENTS: YOUR RECORDKEEPING OBLIGATIONS	37
AIR RECORDKEEPING SECTION	39
FIRE, BUILDING AND ZONING CODES SECTION	65
TABLE 1: CODE SUMMARY FOR ILLINOIS LOCATIONS	73
APPENDIX A: IFC COMPLIANCE MATERIALS	97
APPENDIX B: IFC/NFPA COMPLIANCE MATERIALS	127
APPENDIX C: CHICAGO FIRE CODE COMPLIANCE MATERIALS	159
HAZARDOUS WASTE MANAGEMENT SECTION	189



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**DATE: 2011** 

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

#### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

#### **ILLINOIS 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 received a CRC application to the <u>rear</u> 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 <u>front</u> portion of the frame in these vehicles.

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

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

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

- Frame Internal Surfaces: The interior CRC for the Tundra B0D will be the same 712AM material being used for the Tacoma LSC 90D, and you will be using the same Vaupel HSDR 3300 issued to you for LSC 90D.
- Frame External Surfaces: The exterior CRC for the Tundra B0D will not be X128T (now being used in Tacoma LSC 90D), but a different material known as "Noxudol 300 S." You will be issued one additional Vaupel HSDR 3300 to apply the Noxudol 300 S for the Tundra B0D.

As with the Tacoma LSC 90D, the Tundra B0D CRCs contain Volatile Organic Compounds

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

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

- 1. <u>"GETTING STARTED GUIDE": Gets you started by reviewing the steps your dealership needs to take to comply with federal, state and local laws.</u>
- 2. "GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS": Reviews in more detail relevant federal, state and local laws. Also provides compliance tools.
- 3. <u>"TECHNICAL INSTRUCTIONS": Contains detailed technical instructions that you should follow at all times.</u>

#### **IMPORTANT**

<u>Use Same Spray Space for the LSC 90D and the B0D</u>: 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.

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

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.

### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D ILLINOIS DEALER INFORMATION PACKET

#### **GETTING STARTED GUIDE**

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 <u>Steps 5 and 6</u> below).

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

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

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

The B0D CRC materials contain Volatile Organic Compounds (VOCs), Particulate Matter (PM) and other substances subject to federal and state air quality laws. Generally, these

laws allow emissions up to a certain level and require a facility, if it wishes to exceed that level, to obtain an air permit from the state.<sup>1</sup>

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

Do I Have To Consider My Entire Dealership's Operations Or Only Operations

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

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

As for state air permitting, Toyota Motor Sales, U.S.A., Inc. (TMS) has explained the Tundra B0D to the Illinois Environmental Protection Agency (IEPA). The IEPA has issued a determination that, like the LSC 90D, the B0D is considered a "coating operation" under state air emissions regulations.<sup>2</sup> This determination means that your dealership is not

<sup>&</sup>lt;sup>1</sup> As discussed in the Air Regulations Section of the Guide to Federal, State and Local Requirements, dealers in Fox Lake, Naperville, and Westmont may also be subject to certain local Particulate Matter (PM) emissions regulations. These dealers should be able to comply with such local regulations as long as they observe the vehicle processing limitations noted in this Packet and do not have other significant sources of hourly PM emissions.

<sup>&</sup>lt;sup>2</sup> The IEPA has issued a letter dated October 28, 2011 confirming that the B0D is an "underbody coating" operation and the B0D does not trigger the state air registration requirement for Motor Vehicle Refinishing operations applicable in the Chicago and Metro East Areas. Instead, those dealerships, like all other Illinois dealerships, must comply with the 5,000 gallon limit described in Step 2, item 2 of this Section. (A copy of the IEPA letter is included in the Air Recordkeeping Section of this Guide.)

The <u>Chicago Area</u> includes Cook, DuPage, Kane, Lake, McHenry and Will Counties; Aux Sable Township and Goose Lake Township in Grundy County; and Oswego Township in Kendall County.

The Metro East Area includes Madison, Monroe, and St. Clair Counties.

required to obtain a state air permit as long as you conduct the B0D in a manner that assures emissions are consistent with the levels presented by TMS to IEPA and comply with certain other requirements.

THE IEPA DETERMINATION MEANS THAT YOUR DEALERSHIP WILL BE ABLE TO CONDUCT THE BOD AND REMAIN EXEMPT FROM AIR PERMITTING AS LONG AS YOU:

1. DO NOT ALREADY HAVE A STATE AIR PERMIT FOR EXISTING OPERATIONS.

What should I do if my dealership already has a state air permit? If your dealership already has a state air permit, you may need to seek a modification from the IEPA. 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 and instructions.

### IMPORTANT NOTE FOR DEALERS LOCATED IN THE CITY OF CHICAGO OR IN COOK COUNTY

Some dealers who participated in the Tacoma LSC 90D were required to obtain local air permits from the City of Chicago Department of Environment or the Cook County Department of Environmental Control, depending on the dealer's location. Dealers who participated in the LSC 90D and obtained a local air permit, and who will conduct the Tundra B0D in the same spray space being used for the Tacoma LSC 90D, do not need to obtain an additional or modified local air permit for the B0D.

If your dealership <u>did not participate in the LSC 90D</u> or <u>will not conduct the Tundra B0D in the same spray space as the Tacoma LSC 90D</u>, 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 and instructions.

- 2. DO NOT USE A TOTAL ACROSS YOUR ENTIRE DEALERSHIP OF MORE THAN 5,000 GALLONS OF COATING MATERIALS PER YEAR, INCLUDING THE B0D AND THE LSC 90D CRC MATERIALS AS WELL AS ALL OTHER COATING MATERIALS.
  - a. The IEPA has determined that the application of the 712 AM and X128T CRC materials now being used for the Tacoma LSC 90D, as well as the Noxudol 300S that you will use instead of the X128T for the Tundra B0D, is considered a "coating operation" under its air regulations.
  - b. Part 201 of IEPA regulations requires a facility conducting coating operations to limit its coating usage to 5,000 gallons or less per year in order to remain exempt from permitting. The Air Recordkeeping Section provides forms that you can use to track usage of the CRC materials for the B0D pursuant to this requirement, and you can continue to use the forms

provided in the LSC 90D Dealer Packet to do so until that campaign ends on December 31, 2011. You should make your own decisions about whether and how to track non-LSC 90D and non-B0D coating usage pursuant to this requirement.

c. Under IEPA regulations, a "coating" means a material applied to or impregnated into a surface or base material for protective, decorative, or functional purposes and includes paints, varnishes, sealers, adhesives, thinners, diluents and other similar materials.

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? You must consider YOUR ENTIRE DEALEARSHIP and NOT just the building with the spray space where you will conduct the Tundra B0D. For example, if your dealership's physical plant is distributed across multiple buildings, land parcels or physical locations, all coating materials used anywhere in those buildings and locations would be subject to a single 5,000 gallon limit. If your dealership has an onsite or offsite body shop, 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 and instructions.

- 3. APPLY THE CRCs IN ACCORDANCE WITH THE TECHNICAL INSTRUCTIONS AND DO SO ONLY IN THE SPRAY SPACE ALREADY APPROVED BY YOUR LOCAL FIRE CODE ENFORCEMENT OFFICIAL FOR THE LSC 90D.<sup>3</sup>
  - a. You may conduct vehicle preparation work in another service bay.
  - b. But, do NOT apply the CRCs in any service bay other than the one the one already approved as a spray space for LSC 90D.

<sup>&</sup>lt;sup>3</sup> At the present time, Illinois dealers will conduct the B0D in only one spray space and it will be the same spray space now being used for the LSC 90D. In the future, after conclusion of the LSC 90D on December 31, 2011, TMS may decide to offer a CRC program for other Toyota vehicles. In such event, your dealership may be given the option of establishing a second spray space. TMS will work with your dealership to secure any necessary approvals for a second spray space, if required, for a future CRC program.

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

- (1) Apply only the "Noxudol 300 S" and "712AM" CRCs in specified quantities three liters (0.793 gallons) of Noxudol 300 S and one liter (0.264 gallons) of 712AM per Tundra truck; and
- (2) Use only the Vaupel HSDR 3300 spray gun equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand to apply these CRCs; and
- (3) Maintain the Vaupel HSDR 3300 spray gun in good working order, but **DO NOT** clean the gun. If you have any problems with your spray guns, please go to the C.L.E.A.N. Dealer website (<a href="http://cleandealer.com">http://cleandealer.com</a>) or call the EH&S Hotline (877-572-4347) for more information.
- 4. Assure the Per Vehicle emissions that occur when you are applying the CRCs are consistent with the emissions levels presented by TMS to IEPA by NOT processing more than one Tacoma every 1 hour and no more than one Tundra every 2 hours.
  - a. "Processing" means the application of CRCs with the Vaupel HSDR 3300 spray gun; it does not include vehicle preparation activities.
  - b. The vehicle processing limits mean that once you begin processing a vehicle, you may not begin processing another vehicle until the 2 hours (in the case of a Tundra) or the 1 hour (in the case of a Tacoma) has passed.
  - c. Example #1: You begin processing (*i.e.*, applying the CRCs to) a Tundra at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a second Tundra for processing. You complete processing the first Tundra at 11:30 a.m., and by that time, you also have completed your preparation of the second Tundra for processing. You may move that second Tundra to the spray space at 11:30 a.m., but you may NOT begin processing it until 12:00 p.m. *i.e.*, until 2 hours after you began processing the first Tundra at 10 a.m.
  - d. Example #2: You begin processing (i.e., applying the CRCs to) a Tacoma at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a Tundra for processing. You complete processing the Tacoma at 11:05 a.m., and by that time, you also have completed your preparation of the Tundra for processing. You may move that Tundra to the spray space and begin processing it immediately, given that more than 1 hour has passed since you began processing the

Sample Stall Schedule 12:00 to 1:00 PM 2:00 to 4:00 PM 4:00 to 5:00 PM 8:00 to 10:00 AM 10: 00 to 12:00 PM 1:00 to 2:00 PM Vehicle Cannot start processing other vehicle until 10:00 AM Vehicle Cannot start processing other vehicle until 10:00 AM Cannot start processing 2 another vehicle until 12:00 PM Vehicle Cannot start processing er vehicle until 12:00 PM Cannot start processing 3 another vehicle until 1:00 PM Vehicle Cannot start processing 4 another vehicle until 1:00 PM Cannot start processing another vehicle until 2:00 PM Cannot start processing Vehicle another vehicle until 2 2:00 PM Cannot start processing another vehicle until 4:00 PM Vehicle Cannot start processing Part . 9

Tacoma – i.e., you began processing at 10:00 a.m. and finished at 11:05

Note: This sample schedule is only an example and the order of models sprayed will vary by customer appointment.





a.m.

#### 5. COMPLY WITH HOUSEKEEPING AND RECORDKEEPING REQUIREMENTS AS FOLLOWS:

- a. Keep records that document vehicle processing and usage of B0D materials and retain those records for a period of 3 years after you apply CRCs to the last Tundra under the B0D.
- b. Store all B0D materials and related waste materials in closed containers and ensure those containers are kept closed except when depositing or removing the materials.
- c. Minimize spills of B0D materials, convey the materials in closed containers, and minimize emissions from the cleaning of equipment used to store, mix, or convey the materials.

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

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

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

Your dealership can make its own choices about how best to comply with these codes. To assist you, however, we have prepared a detailed review of these requirements for your reference, which can be found in the <a href="Fire, Building and Zoning Codes Section">Fire, Building and Zoning Codes Section</a> of the <a href="Federal">Federal</a>, <a href="State and Local Requirements Guide">State and Local Requirements Guide</a>. 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 the Tundra B0D in the same space being used for the Tacoma LSC 90D.

What Do I Need To Give My Local Fire Code Enforcement Official? The materials that you will need to give to your local fire code enforcement official are provided in Appendices A, B or C (depending on your location) to the Fire, Building and Zoning Codes Section, except you will need to add some information about the spray space location at your dealership.

YOU MUST SEND THESE MATERIALS BEFORE CONDUCTING THE TUNDRA BOD.

2. CONFIRM THAT YOU CAN CONDUCT THE TUNDRA BOD 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 (<a href="http://cleandealer.com">http://cleandealer.com</a>) to confirm your readiness to start the B0D. Toyota will then automatically ship one additional Vaupel HSDR 3300 spray gun (for the Noxudol 300 S material) to you at no charge.

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

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

- The detailed **Technical Instructions for the B0D Campaign**, and
- The hourly vehicle processing limits discussed in Step 2 above, and
- Step 5 (comply with air recordkeeping and housekeeping requirements), and
- Step 6 (comply with hazardous waste requirements), and
- You should also review the Guide to Federal, State and Local Requirements to better understand the legal requirements for Steps 1, 2, and 3.

# <u>STEP 5</u> – COMPLY WITH AIR RECORDKEEPING AND HOUSEKEEPING REQUIREMENTS

Your dealership must comply with the recordkeeping and housekeeping requirements identified above under Step 2 (Item 5).

The <u>Air Recordkeeping Section</u> of the Guide to Federal, State and Local Requirements contains a form you should use to track the vehicles you process under the B0D and your usage of B0D materials, as well as documentation that shows that B0D operations at your dealership are not subject to state air permitting requirements. You should keep these documents in your files for at least **three (3) years** after you process the last Tundra under the B0D. The <u>Air Regulations Section</u> of the Guide to Federal, State and Local Requirements describes the applicable housekeeping requirements regarding the handling and storage of B0D materials.

#### **STEP 6 – COMPLY WITH HAZARDOUS WASTE REQUIREMENTS**

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

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

<u>However</u>, as described in your Tacoma LSC 90D Dealer Information Packet, <u>one of the materials used in the LSC 90D – X128T – could be hazardous waste when discarded</u>. 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.

### <u>Step 2</u>: Make sure you can conduct Tundra B0D concurrently with Tacoma LSC 90D without triggering air permitting requirements.

Statewide: You can conduct the B0D and remain exempt from state air permitting requirements so long as you (1) do not use a total across your entire dealership of more than 5,000 gallons of coating materials per year, including the B0D and the LSC 90D CRC materials as well as all other coating materials and (2) limit your vehicle processing to no more than 1 Tacoma every 1 hour and no more than 1 Tundra every 2 hours.

<u>Dealers in the City of Chicago and Cook County</u>: You do not need to obtain a local air permit from the City of Chicago Department of Environment or the Cook County Department of Environmental Control if you obtained a permit for the Tacoma LSC 90D and will conduct the Tundra B0D in the same spray space.

<u>Dealers in Fox Lake, Naperville, and Westmon</u>t: You should be able to comply with local requirements regarding Particulate Matter (PM) emissions as long as you limit your vehicle processing to no more than one Tacoma every 1 hour and no more than one Tundra every 2 hours and do not have other operations which may be a significant source of hourly PM emissions.

<u>Step 3</u>: Notify Your Local Fire Official in Writing of Your Intention to Conduct Tundra B0D in the Same Spray Space Being Used For Tacoma LSC 90D, and Confirm Your Compliance with Building and Zoning Code Requirements.

See the 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 (<a href="http://cleandealer.com">http://cleandealer.com</a>) to confirm your readiness to start the B0D. Toyota will then automatically ship one additional Vaupel HSDR 3300 spray gun (for the Noxudol 300 material) to you at no charge.

#### AFTER COMPLETING STEPS 1, 2, 3 & 4 YOU CAN START APPLYING BOD MATERIALS

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

#### **Step 5**: Comply with Air Recordkeeping and Housekeeping Requirements.

You should adhere to the limits identified in Step 2 above (*i.e.*, **you should not use more than 5,000 gallons of coating materials in any one year and you should not process a total of more than one Tundra every 2 hours and more than one Tacoma every 1 hour) and use the form in the <u>Air Recordkeeping Section</u> of this Packet to document that you are exempt from air permitting and are complying with air regulations. (You should continue to use the forms provided in the Tacoma LSC 90D Dealer Package to document your application of LSC 90D CRCs and keep those records for the required three-year period.) You must also comply with the housekeeping requirements regarding the handling and storage of B0D materials.** 

#### **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 (<a href="http://cleandealer.com">http://cleandealer.com</a>) 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.

#### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN BOD

#### ILLINOIS DEALER INFORMATION PACKET

#### SITE SELECTION SECTION

Please carefully review the entire Dealer Information Packet – including this Site Selection Section – with your Service and Parts Staff.

Various legal requirements impose operational limitations on the Tundra B0D, including on the location where you may conduct it.

- If you conduct the B0D in the spray space already being used for the Tacoma LSC 90D, then this location should satisfy these state and local codes for the B0D.
- If not, however, then you will need to select a proper location to conduct the B0D. This Site Selection Section is designed to help you do so.

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

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

#### DEALERS LOCATED IN THE CITY OF CHICAGO OR IN COOK COUNTY

If you plan to establish a new spray space, you must obtain a new local air permit from the City of Chicago Department of the Environment or the Cook County Department of Environmental Control, depending on your location. Please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) for assistance.

#### 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 <u>may not</u> 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 BOD 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); 4
- 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

<sup>&</sup>lt;sup>4</sup> A fire extinguisher should be in the vicinity even if the B0D work area has an automatic fire protection system (e.g., sprinklers).

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.

#### 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 <u>Air Regulations</u>, <u>Fire, Building and Zoning</u>, and <u>Hazardous Waste Management Sections</u>).

#### **B0D Material Storage**

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

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### TOYOTA

### TO: ILLINOIS TOYOTA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

#### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN BOD

## ILLINOIS DEALER INFORMATION PACKET GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS

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

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

- The interior CRC for B0D will be the same 712AM material being used for the Tacoma LSC 90D, and you will use the same Vaupel HSDR 3300 issued to you for LSC 90D to apply the 712AM to Tundra internal frame surfaces for the B0D.
- The exterior CRC for B0D is a material known as "Noxudol 300 S." You will be issued one additional Vaupel HSDR 3300 to apply the Noxudol 300 S for the B0D.

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

- Air emissions regulations and standards issued by the Illinois Environmental Protection Agency (IEPA), Illinois Pollution Control Board (IPCB), the City of Chicago Department of Environment (Chicago DOE) and the Cook County Department of Environmental Control (Cook County DEC); 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, state and local laws that will regulate air emissions from the Tundra B0D at your dealership.
- b. We assume that your dealership is currently exempt from federal "major source" air permitting. Your dealership will be exempt from this federal air permitting it its potential to emit (PTE) for VOCs is less than 100 tons per year (tpy) and less than 100 tpy for PM. You should be able to add 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 LSC 90D and B0D that use spray guns.
- c. As for state air permitting, Toyota Motor Sales, U.S.A., Inc. (TMS) has explained the Tundra B0D to the Illinois Environmental Protection Agency (IEPA). The IEPA has issued a determination that, like the LSC 90D, the B0D is considered a "coating operation" under state air emissions regulations. This determination means that your dealership is not required to obtain a state air permit as long as you conduct the B0D in a manner that assures emissions are consistent with the levels presented by TMS to IEPA and comply with certain other requirements.

THE IEPA DETERMINATION MEANS THAT YOUR DEALERSHIP WILL BE ABLE TO CONDUCT THE B0D AND REMAIN EXEMPT FROM AIR PERMITTING AS LONG AS YOU:

(1) Do not already have a state air permit; and

- (2) Apply the CRCs in accordance with the Technical Instructions and do so ONLY in the spray space already approved by your local fire code enforcement official for the LSC 90D; and
- (3) Do not use a total, across your entire dealership, of more than 5,000 gallons of coating materials per year, including the B0D and the LSC 90D CRC materials as well as all other coating materials; and
- (4) Assure the per vehicle emissions that occur when you are applying the CRCs are consistent with the emissions levels presented by TMS to IEPA by NOT processing more than one Tacoma every 1 hour and no more than one Tundra every 2 hours; and
- (5) Keep records that document Items (3) and (4) above and other required records and comply with housekeeping requirements regarding the handling and storage of B0D materials.
- **d.** Certain local authorities also impose air quality regulations and standards.
  - (1) Dealers located in the City of Chicago or Cook County who participated in the Tacoma LSC 90D were required to obtain local air permits from the City of Chicago Department of Environment or the Cook County Department of Environmental Control, depending on the dealer's location. Dealers who participated in the LSC 90D and who will conduct the Tundra B0D in the same spray space being used for the LSC 90D do not need to obtain an additional or modified local air permit for the B0D.
  - (2) Dealers located in Fox Lake, Naperville, and Westmont may be subject to certain Particulate Matter (PM) regulations. These dealers should be able comply with such local regulations as long as they observe the vehicle processing limitations noted above and do not have other significant sources of hourly PM emissions.
- e. If you will not be able to adhere to the above requirements or if you have questions or concerns relating to these requirements, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information.

#### 2. "AIR RECORDKEEPING" SECTION

**a.** The Air Recordkeeping Section contains copies of necessary records as well as a form that you can use to track the number of vehicles you process under the B0D and your usage of B0D materials. These records will help to demonstrate that your dealership is conducting the B0D consistent with the IEPA determination and in compliance with other air regulatory requirements.

- b. As explained in the Air Regulations Section, the state requires you to maintain compliance records for three (3) years beyond the date that you process the last Tundra under the B0D.
- **c.** The form in the <u>Air Recordkeeping Section</u> is accompanied by a version with text boxes that provides detailed instructions on how to fill out the form.
- d. The customer satisfaction portion of the B0D will end on December 31, 2012, which will alter per-truck emissions and the volume of coating materials used as part of the B0D. At that time, you will be provided a new set of Technical Instructions and new forms for tracking the number of vehicles processed and the use of coating materials associated with the voluntary safety recall applicable to the rear portion of the frame of MY 2000-2003 Tundras, which will continue beyond December 31, 2012.

#### 3. "FIRE, BUILDING, AND ZONING CODES" SECTION

- **a.** The Fire, Building, and Zoning Codes Section reviews state and local fire, building, and zoning codes. In general, these codes apply due to the combustibility of the two B0D CRCs. You should review all of the information carefully to make sure that your dealership can conduct the B0D in compliance with these codes.
- **b.** As explained at the Fire, Building, and Zoning Codes Section, prior to implementing the B0D, your dealership will need to contact your local fire code enforcement official in order to notify the official that you plan to conduct the Tundra B0D in the same spray space as the Tacoma LSC 90D.
- c. A model letter and all of the technical information that you will need to provide to your local fire code enforcement official is included in Appendix A, B, or C to the <u>Fire, Building and Zoning Codes Section</u>, depending on your location. You will need to add some information about the location at your dealership where you will conduct the B0D before you submit these materials. 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 (<a href="http://cleandealer.com">http://cleandealer.com</a>) or call the EH&S Hotline (877-572-4347) for assistance.

#### 4. "HAZARDOUS WASTE MANAGEMENT" SECTION

- **a.** The <u>Hazardous Waste Management Section</u> 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.
- **b.** The materials used in the Tundra B0D 712AM and Noxudol 300 S are not considered "hazardous" waste when they are discarded. In addition, as 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.

\* \* \* \* \* \*

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

If you have any questions after reviewing this information or as you proceed, please go to the C.L.E.A.N. Dealer website (<a href="http://cleandealer.com">http://cleandealer.com</a>) 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.

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#### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN BOD

### ILLINOIS DEALER INFORMATION PACKET GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS

#### **AIR REGULATIONS SECTION**

#### I. AIR PERMITTING REQUIREMENTS

The B0D activities result in emissions of Volatile Organic Compounds (VOCs), <sup>5</sup> and Particulate Matter (PM). These substances are subject to limits on emissions to air under federal and state laws as well as some local laws.

#### A) Federal "Major Source" Air Permitting

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

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

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

1. Your dealership does NOT currently operate a very large body shop or otherwise engage in substantial painting, spraying or other activities that use spray guns.

<sup>&</sup>lt;sup>5</sup> Some Illinois state air emissions regulations use the terms "Volatile Organic Material" or "VOM" instead of Volatile Organic Compounds or VOCs.

Important: Why Does It Matter For Federal "Major Source" Permitting If I Have A Body Shop? The federal "major source" air regulations require emissions from your entire dealership to be combined to determine whether your dealership has air emissions below air permitting levels. Because a very large body shop will have higher air emissions than a regular vehicle service area, you cannot be certain — without further analysis — that your dealership will remain exempt from air permitting after adding the BOD to its operations.

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

If your dealership has a very large onsite or 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 offsite location, please go to the C.L.E.A.N. Dealer website (<a href="http://cleandealer.com">http://cleandealer.com</a>) or call the EH&S Hotline (877-572-4347) for more information.

#### B) State Air Permitting Requirements

As for state air permitting, Toyota Motor Sales, U.S.A., Inc. (TMS) has explained the Tundra B0D to the Illinois Environmental Protection Agency (IEPA). The IEPA has issued a determination that, like the LSC 90D, the B0D is considered a "coating operation" under state air emissions regulations. <sup>6</sup> This determination means that your dealership is not

<sup>&</sup>lt;sup>6</sup> The IEPA has issued a letter dated October 28, 2011 confirming that the B0D is an "underbody coating" operation and the B0D does not trigger the state air registration requirement for Motor Vehicle Refinishing operations applicable in the Chicago and Metro East Areas. Instead, those dealerships, like all other Illinois dealerships, must comply with

required to obtain a state air permit as long as you conduct the B0D in a manner that assures emissions are consistent with the levels presented by TMS to IEPA and comply with certain other requirements.

THE IEPA DETERMINATION MEANS THAT YOUR DEALERSHIP WILL BE ABLE TO CONDUCT THE BOD AND REMAIN EXEMPT FROM AIR PERMITTING AS LONG AS YOU:

DO NOT ALREADY HAVE A STATE AIR PERMIT FOR EXISTING OPERATIONS.

What should I do if my dealership already has a state air permit? If your dealership already has a state air permit, you may need to seek a modification from the IEPA. 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 and instructions.

### IMPORTANT NOTE FOR DEALERS LOCATED IN THE CITY OF CHICAGO OR IN COOK COUNTY

Some dealers who participated in the Tacoma LSC 90D were required to obtain local air permits from the City of Chicago Department of Environment or the Cook County Department of Environmental Control, depending on the dealer's location. Dealers who participated in the LSC 90D and obtained a local air permit, and who will conduct the Tundra B0D in the same spray space being used for the Tacoma LSC 90D, do not need to obtain an additional or modified local air permit for the B0D.

If your dealership <u>did not participate in the LSC 90D</u> or <u>will not conduct the Tundra B0D in the same spray space as the Tacoma LSC 90D</u>, 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 and instructions.

- 2. DO NOT USE A TOTAL, ACROSS YOUR ENTIRE DEALERSHIP, OF MORE THAN 5,000 GALLONS OF COATING MATERIALS PER YEAR, INCLUDING THE B0D AND THE LSC 90D CRC MATERIALS AS WELL AS ALL OTHER COATING MATERIALS.
  - a. The IEPA has determined that the application of the 712 AM and X128T CRC materials now being used for the Tacoma LSC 90D, as well as the Noxudol 300S that you will use instead of X128T for the Tundra B0D, is considered a "coating operation" under its air regulations.

the 5,000 gallon limit described in Step 2, item 2 of this Section. (A copy of the IEPA letter is included in the  $\underline{\text{Air}}$  Recordkeeping Section of this Guide.)

The <u>Chicago Area</u> includes Cook, DuPage, Kane, Lake, McHenry and Will Counties; Aux Sable Township and Goose Lake Township in Grundy County; and Oswego Township in Kendall County.

The Metro East Area includes Madison, Monroe, and St. Clair Counties.

- b. Part 201 of IEPA regulations requires a facility conducting coating operations to limit its coating usage to 5,000 gallons or less per year in order to remain exempt from permitting. The Air Recordkeeping Section provides forms that you can use to track usage of the CRC materials for the B0D pursuant to this requirement, and you can continue to use the forms provided in the LSC 90D Dealer Packet to do so until that campaign ends on December 31, 2011. You should make your own decisions about whether and how to track non-LSC 90D and non-B0D coating usage pursuant to this requirement.
- c. Under IEPA regulations, a "coating" means a material applied to or impregnated into a surface or base material for protective, decorative, or functional purposes and includes paints, varnishes, sealers, adhesives, thinners, diluents and other similar materials.

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? You must consider YOUR ENTIRE DEALEARSHIP and NOT just the building with the spray space where you will conduct the Tundra B0D. For example, if your dealership's physical plant is distributed across multiple buildings, land parcels or physical locations, all coating materials used anywhere in those buildings and locations would be subject to a single 5,000 gallon limit. If your dealership has an onsite or offsite body shop, 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 and instructions.

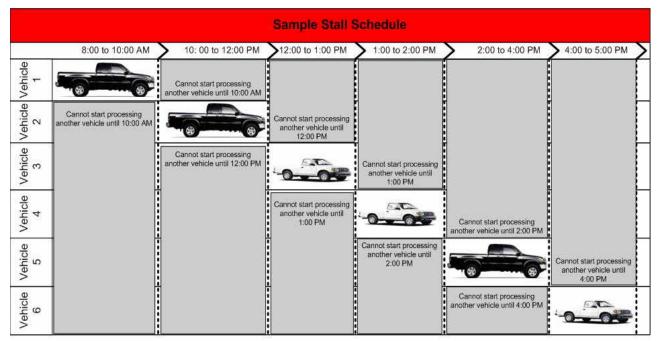
- 3. APPLY THE CRCs IN ACCORDANCE WITH THE TECHNICAL INSTRUCTIONS AND DO SO ONLY IN THE SPRAY SPACE ALREADY APPROVED BY YOUR LOCAL FIRE CODE ENFORCEMENT OFFICIAL FOR THE LSC 90D.<sup>7</sup>
  - a. You may conduct vehicle preparation work in another service bay.
  - b. But, do NOT apply the CRCs in any service bay other than the one the one already approved as a spray space for LSC 90D.

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At the present time, Illinois dealers will conduct the B0D in only one spray space and it will be the same spray space now being used for the LSC 90D. In the future, after conclusion of the LSC 90D on December 31, 2011, TMS may decide to offer a CRC program for other Toyota vehicles. In such event, your dealership may be given the option of establishing a second spray space. TMS will work with your dealership to secure any necessary approvals for a second spray space, if required for a future CRC program.

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

- (1) Apply only the "Noxudol 300 S" and "712AM" CRCs in specified quantities three liters (0.793 gallons) of Noxudol 300 S and one liter (0.264 gallons) of 712AM per Tundra truck; and
- (2) Use only the Vaupel HSDR 3300 spray gun equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand to apply these CRCs; and
- (3) Maintain the Vaupel HSDR 3300 spray gun in good working order, but **DO NOT** clean the gun. If you have any problems with your spray guns, please go to the C.L.E.A.N. Dealer website (<a href="http://cleandealer.com">http://cleandealer.com</a>) or call the EH&S Hotline (877-572-4347) for more information.
- 4. Assure the per vehicle emissions that occur when you are applying the CRCs are consistent with the emissions levels presented by TMS to IEPA by NOT processing more than one Tacoma every 1 hour and no more than one Tundra every 2 hours.
  - a. "Processing" means the application of CRCs with the Vaupel HSDR 3300 spray gun; it does not include vehicle preparation activities.
  - b. The vehicle processing limits mean that once you begin processing a vehicle, you may not begin processing another vehicle until the 2 hours (in the case of a Tundra) or the 1 hour (in the case of a Tacoma) has passed.
  - c. Example #1: You begin processing (*i.e.*, applying the CRCs to) a Tundra at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a second Tundra for processing. You complete processing the first Tundra at 11:30 a.m., and by that time, you also have completed your preparation of the second Tundra for processing. You may move that second Tundra to the spray space at 11:30 a.m., but you may NOT begin processing it until 12:00 p.m. *i.e.*, until 2 hours after you began processing the first Tundra at 10 a.m.
  - d. Example #2: You begin processing (*i.e.*, applying the CRCs to) a Tacoma at 10:00 a.m. in the spray space already approved for the LSC 90D. In another service bay, you begin preparing a Tundra for processing. You complete processing the Tacoma at 11:05 a.m., and by that time, you also have completed your preparation of the Tundra for processing. You may move that Tundra to the spray space and begin processing it immediately, given that more than 1 hour has passed since you began processing the Tacoma *i.e.*, you began processing at 10:00 a.m. and finished at 11:05 a.m.



Note: This sample schedule is only an example and the order of models sprayed will vary by customer appointment.





#### 5. COMPLY WITH HOUSEKEEPING AND RECORDKEEPING REQUIREMENTS AS FOLLOWS:

- a. Keep records that document vehicle processing and usage of B0D materials and retain those records for a period of 3 years after you apply CRCs to the last Tundra under the B0D.
- b. Store all B0D materials and related waste materials in closed containers and ensure those containers are kept closed except when depositing or removing the materials.
- c. Minimize spills of B0D materials, convey the materials in closed containers, and minimize emissions from the cleaning of equipment used to store, mix, or convey the materials.

### C) <u>Local Air Permitting Requirements for Dealers Located in the City of Chicago or Cook County</u>

1. Your dealership will not need to obtain a local air permit if your dealership already obtained a local air permit for the Tacoma LSC 90D and you will conduct the Tundra B0D in the same LSC 90D spray space.

How do I know if I need to obtain a local air permit from the City of Chicago or Cook County? If your dealership is located in the City of Chicago or Cook County, but either did not participate in the Tacoma LSC 90D or will not conduct the Tundra B0D in

the same spray space as the Tacoma LSC 90D, then you will need a local air permit. 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 and instructions.

You are also required to maintain certain records in your files. Go to the <u>Air Recordkeeping Section</u> of the <u>Guide to Federal</u>, <u>State and Local Requirements</u> for more information and necessary documentation.

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

#### A) Exemption For B0D from State Air Permitting Requirements

- 1. Generally, new air emission sources in Illinois, even minor sources, are required to obtain air permits prior to their construction and operation, unless the source qualifies for an exemption from those requirements.
- 2. The B0D falls under one such exemption. Coating operations located at emitting sources that do not use more than 5,000 gallons of coating materials, including thinner, per year are exempt from the requirement to obtain state air permits. This includes the LSC 90D and B0D materials as well as all other coating materials used in coating operations.
  - a. The Tacoma LSC 90D and Tundra B0D should not require the use of more than 1,000 gallons of CRC coating materials per year, and will likely require much less,<sup>8</sup> as long as you <u>use the same spray space for both the LSC 90D and the B0D</u> and <u>do not process more than one Tundra every 2 hours or more than one Tacoma every 1 hour.</u>
  - **b.** Accordingly, your dealership should be able to keep below the 5,000 gallon per year limit as long as you do not use more than 4,000 gallons of coating materials, including thinner, in non-LSC 90D and non-B0D operations per year.
  - **c.** Under state air emissions regulations, a "coating" means a material applied to or impregnated into a surface or base material

This 1,000 annual gallon usage estimate has been calculated based on the Tundra Units in Operation (UIO). For the calculation, the largest Tundra UIO for a dealership in Illinois is multiplied by 150% and then multiplied by the 1.06 gallons of the B0D CRCs needed to process each Tundra. This calculation is quite conservative for several reasons, including: (1) It relies on the largest UIO for an Illinois dealer and then scales that up by an additional 50%, whereas many dealers would have a lower UIO; (2) the UIO covers not only the MYs 2000-2003 now subject to B0D, but also additional MYs 2004-2008 now being evaluated for a possible future CRC customer satisfaction program; and (3) the UIO is not just for Tundras that might be serviced in a one year period, but for the entire B0D, which is scheduled to run for more than one year. Notably, this annual gallon usage estimate also is sufficient to cover the remaining amount of LSC 90D materials usage, given that B0D and LSC 90D are being conducted in the same spray space and

LSC 90D is scheduled to conclude on December 31, 2011.

for protective, decorative, or functional purposes and includes paints, varnishes, sealers, adhesives, thinners, diluents and other similar materials.

- d. If you believe your dealership may use more than 4,000 gallons per year of coating materials, including thinner, in non-LSC 90D or B0D coating operations, please call the EH&S Hotline (877-572-4347) for more information.
- 3. Dealers in the Chicago and Metro East Areas<sup>9</sup> are subject to additional state air regulations. However, TMS has obtained a determination from the IEPA that the B0D is considered a "coating operation" and that these dealers are not subject to state air registration requirements and are exempt from state air permitting requirements under the same 5,000 gallon limit for coating materials described above. A copy of IEPA's determination letter has been included in the <u>Air Recordkeeping Section</u> of this Guide.

#### B) Federal "Major Source" Air Permitting

# 1. <u>Volatile Organic Compounds (VOCs): Keep Potential To Emit (PTE)</u> <u>Below the "Major Source" Threshold</u>

- **a.** The PTE for VOCs from all activities (*i.e.*, B0D, LSC 90D and other activities) at your dealership must be less than 100 tons per year (tpy).
  - ➤ The B0D has a PTE for VOCs of 0.05 tons. The LSC 90D (for remaining 1996 2004 MY Tacomas) has a PTE for VOCs of 1.17 tons. Therefore, total PTE for VOCs from both campaigns is 1.22 tons.
  - This means that all other activities at your dealership must not have combined PTE for VOCs greater than 98.78 tpy.
- **b.** Your dealership's current PTE for VOC should be well below this level as long as you do not have a very large onsite or an offsite

<sup>9</sup> The <u>Chicago Area</u> includes Cook, DuPage, Kane, Lake, McHenry and Will Counties; Aux Sable Township and Goose Lake Township in Grundy County; and Oswego Township in Kendall County. The <u>Metro East Area</u> includes Madison, Monroe, and St. Clair Counties.

<sup>&</sup>lt;sup>10</sup> The VOC PTE of 0.06 tons for B0D has been calculated based on Tundra Units in Operation (UIO). For the calculation, the largest Tundra UIO for a dealership in Illinois is multiplied by the VOC emissions associated with processing 1 vehicle and then that number is multiplied by 150%. To ensure this PTE represents maximum potential emissions for application of CRCs to Tundras, the UIO used in the calculation covers not only the MYs 2000-2003 now subject to B0D, but also additional MYs 2004-2008 now being evaluated for a possible future CRC customer satisfaction program.

body shop or otherwise engage in substantial painting, spraying or other activities that use spray guns. Therefore, you should be able to conduct the B0D and LSC 90D at your dealership and stay below the major source air permitting threshold for VOCs.

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

- **a.** The PTE for PM from all activities (*i.e.*, B0D, LSC 90D and other activities) at your dealership must be less than 100 tpy.
  - ➤ The B0D has a PTE for PM of 0.05 tons. The LSC 90D (for remaining 1996 2004 MY Tacomas) has a PTE for PM of 0.03 tons. Therefore, total PTE for PM from both campaigns is 0.08 tons.
  - This means that all other activities at your dealership must not have combined PTE for PM greater than 99.92 tpy.
- **b.** Your dealership's current PTE for PM should be well below 99.92 tpy.

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

### C) Particulate Matter (PM) Emissions – Stay Below 0.55 Pounds Per Hour: IEPA regulations require that PM emissions from an individual "process" must not exceed an "Allowable PM Emissions Rate."

1. For operations, such as the B0D and the LSC 90D, with a "Process Weight Rate" of less than 100 lbs/hour, the Allowable PM Emissions Rate is set at 0.55 pounds per hour.

35

<sup>&</sup>lt;sup>11</sup> The PM PTE of 0.05 tons, as with the VOC PTE, was calculated based on Units in Operation (UIO). See footnote 10 above for further information.

2. B0D has an hourly PM emissions rate of 0.047 lbs/hour, and the LSC 90D has an hourly PM emissions rate of 0.068 pounds per hour. Thus, both B0D and LSC 90D have an hourly PM emissions rate well below the 0.55 pounds per hour limit.<sup>12</sup>

### D) Housekeeping Requirements

- **1.** Regulations governing the handling and storage of B0D and LSC 90D materials require you to:
  - **a.** Store all B0D and LSC 90D materials and related waste materials in closed containers;
  - **b.** Ensure that all containers used to store B0D and LSC 90D materials are kept closed except when depositing or removing those materials; and
  - **c.** Minimize spills of B0D and LSC 90D materials, convey the materials in closed containers, and minimize emissions from the cleaning of equipment used to store, mix, or convey the materials.

### E) Local PM Emissions Limits for dealers in Fox Lake, Naperville, and Westmont:

1. Naperville Dealers: Local regulations in Naperville prohibit the emission of particulate matter containing more than five percent, by weight, of particles with a diameter larger than forty-four microns. TMS has determined that the B0D should comply with this limit, given the characteristics of the B0D CRC materials and the spray gun used to apply these materials. If you have questions about complying with this limit, please call the EH&S hotline (877-572-4347) for more information.

<sup>&</sup>lt;sup>12</sup> IEPA regulations do not require you to maintain PM emissions records; however, it is possible that questions may arise regarding PM emissions from the LSC. Should such questions arise, you can refer to the discussion below:

<sup>(1) &</sup>quot;Process weight" means the total actual weight of all materials introduced into any process per hour.

<sup>(2)</sup> For processes that are not continuous, like the B0D and LSC 90D, the Process Weight Rate is calculated by dividing the actual weight of raw materials used by the operating time for one vehicle. If your dealership limits its processing to no more than 1 Tacoma every 1 hour, the LSC 90D's Process Weight Rate is 10.20 lbs/hr, with PM emissions of 0.068 lbs/hr. If your dealership limits its processing to no more than 1 Tundra every 2 hours, the B0D Process Weight Rate is 4.02 lbs/hr, with PM emissions of 0.047 lbs/hr.

- 2. Fox Lake and Naperville Dealers: In both Fox Lake and Naperville, local regulations limit PM emissions to not more than one pound of PM per acre of lot area per hour. As noted above, B0D has an hourly PM emissions rate of 0.047 lbs/hour, and the LSC 90D has an hourly PM emissions rate of 0.068 pounds per hour. TMS also has calculated a combined LSC 90D and B0D PM emissions rate based on the vehicle processing limits of no more than one Tundra every 2 hours and one Tacoma every 1 hour. This combined maximum hourly PM emissions rate is 0.07 lbs/hour. We assume that dealerships in Fox Lake and Naperville are located on lots not smaller than one acre, and therefore, that the maximum PM emissions per acre of lot area per hour from the B0D and the LSC 90D would be 0.07 lbs/hour per acre. That means that unless your dealership emits more than 0.93 lbs/hour of PM from other sources, you will comply with the one pound of PM per acre of lot area per hour limit. If you believe your dealership may emit more than 0.93 lbs/hour of PM from NON-LSC 90D and B0D operations or you have questions about how to assess your PM emissions, please call the EH&S Hotline (877-572-4347) for more information.
- 3. Westmont Dealers: Westmont has specific air nuisance standards. If your dealership adheres to with the vehicle processing limits, you should be in compliance with these standards. For more information and support, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

### III. AIR REGULATORY REQUIREMENTS: YOUR RECORDKEEPING OBLIGATIONS

Your dealership should maintain certain records to comply with state air emissions regulations and/or to demonstrate that you are exempt from air permitting. You must keep those records at your dealership for three (3) years beyond the date that you process the last Tundra under the B0D.

### A) B0D Processing and Materials Usage Records

- 1. Your dealership should document the amount of B0D materials applied each day, if any, and the VOC content of those materials. In the Air Recordkeeping Section of this Guide, you will find a "Illinois B0D Production and Materials Usage Log" and detailed instructions for completing the form. You can use this form to track the number of Tundras you process and your usage of B0D materials on a daily and monthly basis. This form can also be used to determine the total volume of B0D coating materials used on a yearly basis to help you ensure that your dealership remains exempt from state air permitting requirements by limiting your total usage of all coating materials, including thinner, to less than 5,000 gallons per year.
- Your dealership is not required to maintain PM emissions records. It is possible, however, that a question may arise regarding PM emissions from the B0D. You can use the daily record of vehicles processed by your dealership as documented in the <u>B0D Production and Materials</u> <u>Usage Log</u> to demonstrate that your dealership has limited its processing to no more than 1 Tacoma every 1 hour and to no more than 1 Tundra every 2 hours, and therefore complied with applicable PM emission limits.
- 3. To ensure that you keep accurate records, you must <u>apply the B0D</u> materials as supplied to you by TMS (i.e., do not thin or mix the B0D materials with other materials such as catalysts, reducers, hardeners, etc.) and use only one B0D kit per Tundra.

### B) Other Records

You also should include copies of the following in your B0D records:

- **a.** The Vaupel HSDR 3300 spray gun manufacturer's specifications;
- **b.** The Material Safety Data Sheet (MSDS) for each B0D CRC material;
- **c.** A copy of the IEPA letter confirming that the Tundra B0D, like the Tacoma LSC 90D, is considered a "coating operation" under state air emissions regulations.

Copies of these documents are included in the <u>Air Recordkeeping Section</u> of this Guide.

### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

### ILLINOIS DEALER INFORMATION PACKET GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS

### AIR RECORDKEEPING SECTION

IMPORTANT: Please maintain these documents in your dealership's records for a period of three (3) years after the date that you apply CRCs to the last Tundra under the B0D.

We recommend that your dealership maintain the documents and records listed below pursuant to applicable recordkeeping and retention requirements established by state air emissions regulations and to document that the B0D is exempt from state air permitting requirements. This Section contains a form (the "Illinois B0D Production and Materials Usage Log") that you should use to track the number of trucks you process per day under the B0D and your daily usage of B0D materials, as well as detailed instructions on how to fill out that form.

Your dealership must maintain the following documents and records for <u>three (3) years</u> after the date you apply CRCs to the last Tundra under the B0D:

- 1. Monthly B0D Production and Materials Usage Records (use the attached "<u>Illinois</u> <u>B0D Production and Materials Usage Log</u>"); <u>and</u>
- 2. B0D Process Overview: and
- 3. Vaupel HSDR 3300 Spray Gun Manufacturer's Specifications; and
- 4. MSDS for each B0D material (NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements); and
- 5. Letter from IEPA dated October 28, 2011, confirming that the B0D is a coating operation under state air emissions regulations.

### Notes:

- I. You do not need to do anything with items (2) through (5) 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 three (3) years. You should keep the records for three years after the date you treat the last Tundra under the B0D.
- III. The customer satisfaction portion of the B0D will end on December 31, 2012, which will alter per-truck emissions and the volume of coating materials used as part of the B0D. At that time, you will be provided a new set of Technical Instructions and new forms for tracking the number of vehicles processed and the use of materials associated with the voluntary safety recall applicable to the rear portion of the frame of MY 2000-2003 Tundras, which will continue beyond December 31, 2012.

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### Instructions for Completing the Illinois B0D Production and Materials Usage Log

Follow these four steps to complete the B0D Production and Materials Usage Log (see example below).

### Step 1:

Enter the "Reporting Month and Year" and "Dealership Name" at the top of the log.

### Step 2:

Enter the date, the number of trucks that you serviced with B0D materials on that date, if any, and the time that you completed each of the trucks processed. To comply with the hourly PM emissions, no Tundra should be completed within two hours of any other truck (Tundra or Tacoma) treated with either LSC 90D or B0D materials.

### **Step 3**:

Enter the total volume (in gallons) of each B0D material used each day, if any.

Multiply the number of Tundra trucks processed on a day by the amount of 712AM (0.26 gallons) and Noxudol 300 S (0.79 gallons) in each B0D kit, then enter the result in the appropriate column.

Reporting Month and Year:

Dealership Name:

	Daily Log				
Date	Number of Tundras Processed	Time of Completion	712 AM Material Used (gal.)	Noxudol 300 S Material Used (gal.)	
11-1-11 🛦	1 🖍	<b>▼</b> 11:30	0.26	▼ 0.79	
11-2-11	2	10:35, 2:45	0.52	1.58	
11-3-11	0				
11-4-11	1	12:00	0.26	0.79	
11-5-11	2	11:10, 2:20	0.52	1.58	
11-6-11	0				
11-7-11	3	10:35, 1:50, 5:00	0.78	2.37	

Monthly Totals		
Total Number of Tundras Processed	Total Amount of 712AM Material Used (gal.)	Total Amount of Noxudol 300 S Material Used (gal.)
		<b>&gt;</b>

### Step 4:

Record the total number of trucks processed and amount of each B0D material (in gallons) used on a monthly basis. Add the number of vehicles processed and amount of each material used in the month and enter the totals in the appropriate columns.

(This page intentionally left blank.)

### Illinois B0D Production and Materials Usage Log

Reporting Month and Year:	Dealership name:	

### **Coating Line Operation Information:**

- Each Tundra must be treated with one B0D kit containing the following materials: 0.264 gallons (1 liter) of 712 AM and 0.793 gallons (3 liters) of Noxudol 300 S.
  - o 712AM VOM content: 0.165 lb/gal (19.7 g/L)
  - o Noxudol 300 S VOM content: 0.089 lb/gal (10.7 g/L)
- Use only ONE B0D kit per vehicle.
- The materials should be applied as supplied and <u>must not</u> be thinned or mixed with any other materials (e.g., catalysts, reducers, or hardeners).
- You must maintain this B0D Production and Materials Tracking Log and the MSDS for each material for a period of at least **3 years** after the date you process the last Tundra under the B0D.

	Daily Log				
Date	Number of Tundras	Time of Completion	712AM Material Used* (gal.)	Noxudol 300 S Material Used** (gal.)	

<sup>\*</sup> Each B0D kit (one per Tundra) contains 0.26 gallons of 712AM

<sup>\*\*</sup> Each B0D kit (one per Tundra) contains 0.79 gallons of Noxudol 300 S

Date	Number of Tundras	Time of Completion	712AM Material Used* (gal.)	Noxudol 300 S Material Used** (gal.)

<sup>\*</sup> Each B0D kit (one per Tundra) contains 0.26 gallons of 712AM \*\* Each B0D kit (one per Tundra) contains 0.79 gallons of Noxudol 300 S

Monthly Totals		
Total Number of Tundras Processed	Total Amount 712AM Material Used (gal.)	Total Amount Noxudol 300 S Material Used (gal.)

This record must be maintained for 3 years after you process the last Tundra under the B0D. Duplicate as Necessary.

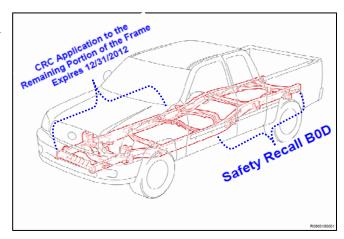
### **TUNDRA BOD PROCESS OVERVIEW**

The Tundra Corrosion-Resistant Compound Campaign B0D (B0D) comprises two processes:

- 1) <u>Safety Recall B0D Application Area</u>, which entails application of Noxudol 300 S to the external surfaces of the rear portion of the Tundra frame. This procedure is available to customers without a time limit.
- 2) <u>Customer Satisfaction Program Application Area</u>, which entails application of Noxudol 300 S to the external surface, and application of 712AM to the internal surface, of the front portion of the frame. This procedure is available until 12/31/2012.

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

Tundra Frame Diagram Identifying B0D Components

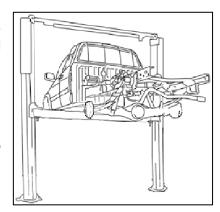


**Step 1: Initial Work Area Setup.** Locate dedicated work area in dealership's service area that has a vehicle lift, is well ventilated, is away from other vehicles, and can be sectioned off with temporary partitions. No physical alteration of the workspace or installation of new equipment is required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

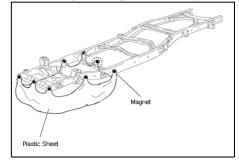
**Step 2: Vehicle Preparation.** Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

- Remove truck bed assembly.
- Clean frame, if necessary. It may be necessary to clean the frame, including pressure washing. No chemicals or solvents will be used to clean the frame.
- Place vehicle on lift. Raise the vehicle using the vehicle lift; remove certain vehicle components (e.g., tires and wheels, spare tire, engine under cover).
- Work area setup. Place tarp beneath vehicle and set up temporary partitions around vehicle. Tarps are intended to capture limited overspray and to facilitate clean-up.
- > <u>Prepare frame</u>. Manually remove rust from frame using scraper, wire brush, and/or compressed air.
- ➤ <u>Mask parts</u>. 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.

Tundra on Lift with Bed Removed



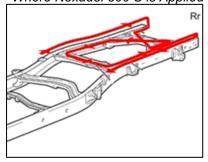
Attachment of Plastic Sheet to Capture any 712AM Drips



### Step 3: Material Application. Dealers will apply the B0D Corrosion-Resistant Compounds as follows:

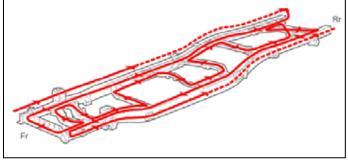
- Apply 712AM. Set up Vaupel spray gun and insert 8mm 360° Spray Wand Inserted into Frame spray nozzle a specified distance into selected holes in the frame. Press spray gun trigger and pull out nozzle at fixed speed while spraying interior surface of frame with one liter of 712AM. When finished, insert rubber plugs and foam blocks to keep 712AM in the frame.
  - 90cm (36 in)
- 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.

Top Surface of Rear Frame Portion Where Noxudol 300 S is Applied



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

Side and Bottom Surfaces of Frame where Noxudol 300 S is Applied



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

# **OPERATING INSTRUCTIONS**

## **3300 HSDR CAVITY PRESSURE CONTAINER GUN**

### This gun may only be threads have a slot used for pressure containers which

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
- Arrange to have practical instruction before your first
- Check the device before each use
- Allow only a specialist to make repairs.
- Alteration or modification of the device is forbidden.
- Use the device only with the prescribed pressure. Use only original accessories.
- Do not spray into flames or onto glowing bodies.
  - Working areas must be brightly lit, well ventilated and
    - Store the device and its accessories out of reach of must conform to applicable health and work safety Do not inhale spray mist
- Device Characteristics

Working Press. 2-6 bar Max. Press. 8 bar

- 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.

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

## Working Instructions / Application - Fill the pressure container (32) with spray product.

- spray product and screw the container to the underside of Immerse the pistol body with ascending tube into the
- Insert cavity spray tube with round spray nozzle or cavity spray tube with angle nozzle and nipple into the quick coupling (20).
  - Depress the trigger to the first step and check whether Connect the gun to the compressed-air supply 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
- Store the gun only upright if material remains in the pressure tank.

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

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

Put oil on the valve bolt or into the air intake port of the gun. Depress the trigger (2) several times Valve bolt (8) is stuck or does not close:

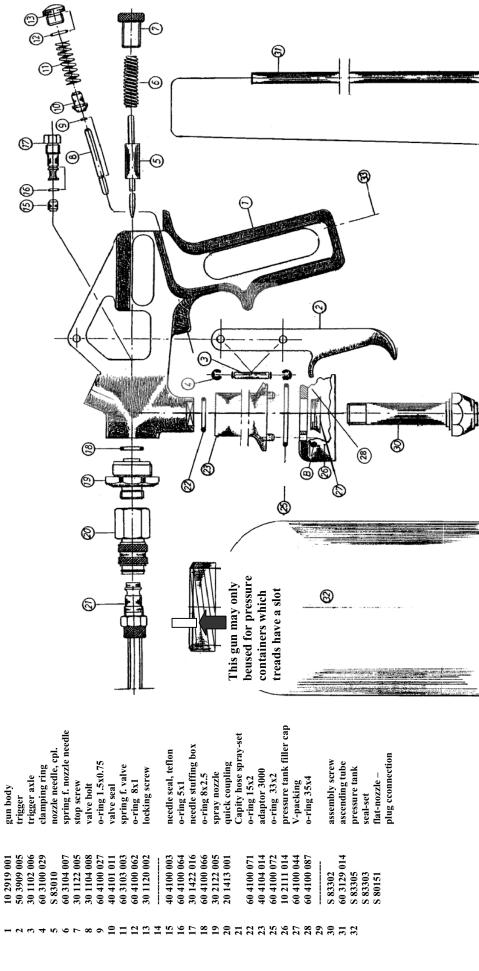
Spray nozzle (19), ascending tube (31), cavity spray tube round spray or angle nozzle or gun (1) partly clogged. Remove deposits with cleaning agent. Gun does not spray properly:

## **Environmental Protection**

The device, its accessories and packing material should be recycled in an environmentally correct manner.

## pressure container gun Druckbehälterpistole

gun body



### 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

HEALTH	1
FIRE	1
REACTIVITY	0
PERSONAL PROTECTION	В

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**

Component Microcrystalline wax CAS #64742-42-3	Wt% 5-10	Recommended Exposure Limits (TWA)  ACGIH TLV: 2 mg/m <sup>3</sup> OSHA PEL: 2 mg/m <sup>3</sup>
Petroleum distillates, solvent dewaxed heavy paraffinic CAS #64742-65-0	5-15	ACGIH TLV: 5 mg/m <sup>3</sup> OSHA PEL: 5 mg/m <sup>3</sup>
Sulfonic acids, petroleum, Calcium salts, overbased CAS #68783-96-0	5-15 OSHA	ACGIH TLV: 5 mg/m³ (oil mist) PEL: 5 mg/m³ (oil mist)
White mineral oil, petroleum CAS #8042-47-5	50-60	ACGIH TLV: 5 mg/m³ (oil mist) OSHA PEL: 5 mg/m³ (oil mist)
Bentonite, quaternary ammonium compound modified CAS# 68953-58-2	0.3-1.0	Not established

712AM 3/17/2011 Page 1 of 4

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 <sup>3</sup> (respirable fraction) OSHA PEL: 15 mg/m <sup>3</sup> (total dust) ACGIH TLV: 10 mg/m <sup>3</sup> ( <sup>[2]</sup> nuisance dust)

<sup>[2]</sup> 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, CO<sub>2</sub>, 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.

712AM 3/17/2011 Page 2 of 4

### 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:

Boiling Point (initial):

Evaporation Rate (n-Butyl Acetate=1):

Vapor Pressure (mmHg @ 20°C):

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.

712AM 3/17/2011 Page 3 of 4

### **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:* 

**CHEMICAL** 

CAS NO.

WT %

NONE

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:* 

**CHEMICAL** 

CAS NO.

WT%

RQ/TPQ Lbs

**NONE** 

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

CHEMICAL

CAS NO.

WT %

Final RQ Lbs

NONE

### **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:

**CHEMICAL** 

CAS NO.

Estimated Concentration %

NONE

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.

712AM 3/17/2011 Page 4 of 4



Last Updated April 18, 2011

### 1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S Synonyms: None

Product Codes: None Chemical Name: Anti Rust Compound

Product Use: Vehicle Underbody Coating

Manufacturer: Auson AB US Distributor: Soken Trade Corporation

Verkstadsgatan 3 12055 Sherman Way S-434 42 Kungsbacka North Hollywood, CA

Sweden USA

 www.auson.se
 www.noxudolusa.com

 PHONE:
 +46 300-562000

 (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** 

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

**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.



Last Updated April 18, 2011

### 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.



Last Updated April 18, 2011

### 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):

**MIMIMUM 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



Last Updated April 18, 2011

**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. CAS NO. CHEMICAL NAME

64741-88-4 Solvent-refined heavy paraffinic distillate

mg/m3

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

68783-96-0 PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE

AND CALCIUM CARBONATE DISPERSION

MG/M3

OSHA PEL-TWA:

OSHA PEL STEL:

OSHA PEL CEILING:

ACGIH TLV-TWA:

ACGIH TLV STEL:

ACGIH TLV CEILING:

NONE

68410-37-7 FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID,

PENTAERYTHRITOL AND TALL OIL

MG/M3

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

8002-74-2 PARAFFIN AND HYDROCARBON WAXES

MG/M3

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

CALIFORNIA PROPOSITION 65: This product may contain trace quantities of chemicals that are identified by



Last Updated April 18, 2011

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.



Last Updated April 18, 2011

### 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



Last Updated April 18, 2011

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

Domestic (Land, D.O.T.), International (Water, I.M.O.), International (Air, I.C.A.O.)

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

Last Updated April 18, 2011

### 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!

Hazardous Material Information System (HMIS):	Health	1
	Flammability	1
	Reactivity	0
	Personal Protection	



Last Updated April 18, 2011

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)

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Part Number: --

Supersedes Date: March 1, 2011

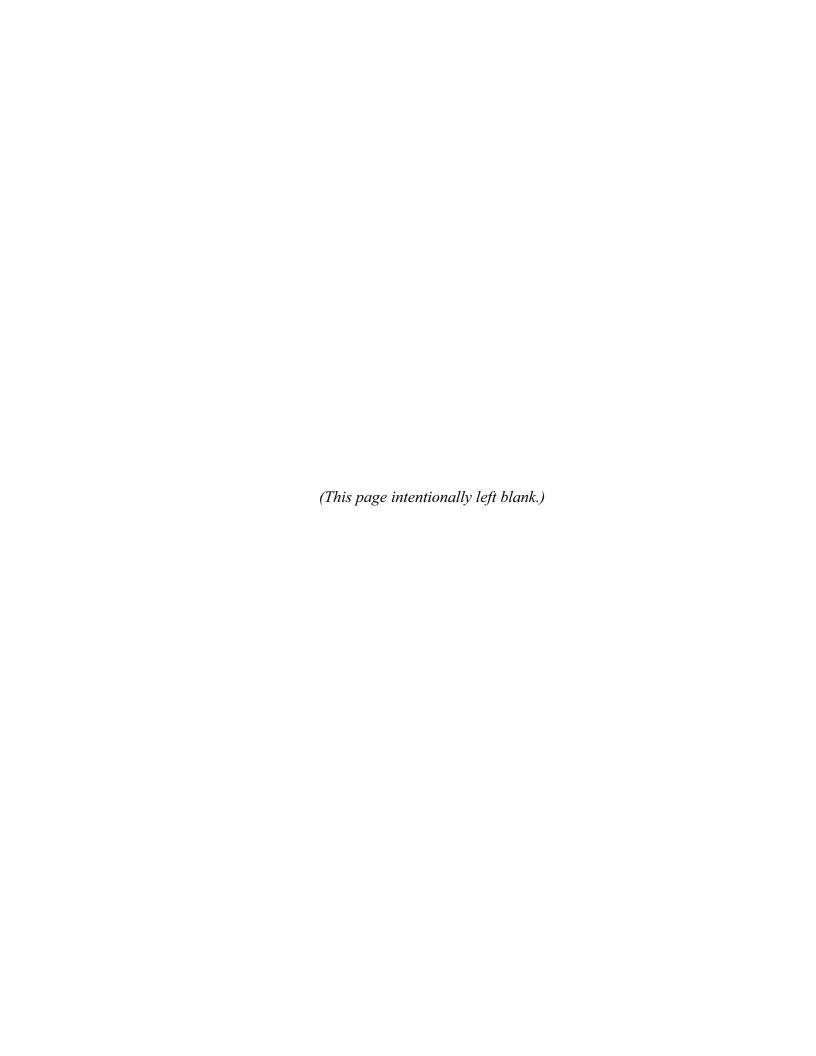
### ADDITIONAL INFORMATION:

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** 



### **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**



1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

October 28, 2011

Karl A. Karg Latham & Watkins, LLP 233 S. Wacker Drive Suite 5800 Chicago, Illinois 60606

Re:

Toyota Limited Service Campaign

### Dear Karl:

I have reviewed your letters received August 23, 2011, and October 3, 2011, in light of your previous letters of October 25, 2010 and September 1, 2009, and discussed it with other members of the Illinois Environmental Protection Agency ("Illinois EPA"). As with your previous requests, you ask that the Illinois EPA concur that Subpart F of Parts 218 and 219 of Title 35 of the Illinois Administrative Code should be used as the set of regulations applicable to Toyota Motor Sales, U.S.A., Inc.'s ("TMS") Limited Service Campaign and subsequent Corrosion-Resistant Compound B0D safety recall. This third request originally sought an extension of the time allowed for the Corrosion-Resistant Compound B0D safety recall with no end date as it was a safety recall. I note that in your follow-up letter of October 3, 2011, you amended the request to add an end date of December 31, 2015. Again, this concurrence would involve our determination that Subpart HH of Part 218 is not applicable to TMS's activities described in your letters as relate to the Corrosion-Resistant Compound B0D recall. It is my understanding that this second campaign, or Corrosion-Resistant Compound B0D safety recall, would involve 2000 to 2003 model year Tundra trucks and that the emissions profile for this phase will be significantly lower than the emissions in the previous Limited Service Campaign which emissions profile was provided to the Illinois EPA.

Based upon the information in your August 23, 2011 and October 3, 2011, letters and prior letters of October 25, 2010 and September 2009, as well as prior information provided by TMS to Illinois EPA and discussions held between TMS and the Illinois EPA, the Illinois EPA agrees that the activities to be performed as part of the Corrosion-Resistant Compound B0D safety recall fall within the framework of Subpart F (Coating Operations) of the Part 218 and 219 regulations. Accordingly, no application for a variance is necessary for use of the Vaupel HSDR 3300 spray gun during the Corrosion-Resistant Compound B0D safety recall, so long as it is carried out under the terms described in your letter. Should the coatings/application methods differ, the appropriate governing provision may change.

I also would note, however, that when these discussions first were initiated by you on behalf of TMS, the anticipated length of time involved with the Limited Service Campaign was not contemplated to extend into 2015 (even though different vehicle models are involved). Given this continued period of time which is involved, if further campaigns beyond that which you have described are undertaken, we may need to further discuss whether these letters from the Illinois EPA are the best means by which TMS should proceed. Specifically, it is possible we will need to re-visit whether a more formal means of relief would be more appropriate.

If you have any further questions or comments, please feel free to contact me at 217/782-5544.

Sincerely,

John J. Kim Interim Director

### TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN BOD

### ILLINOIS DEALER INFORMATION PACKET FEDERAL. STATE AND LOCAL REQUIREMENTS GUIDE

### FIRE, BUILDING AND ZONING CODES SECTION

<u>Please review the entire Information Packet – including this Fire, Building and Zoning</u>
<u>Codes Section – with your Service and Parts staff.</u>

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 BOD?

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 Tacoma LSC 90D from your local fire code enforcement official. <u>Before beginning the Tundra B0D</u>, 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 the 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.

<u>Different Space From Tacoma LSC 90D</u>: 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 either Appendix A, B, or C, depending on your location, you will find a model letter and attachments that you can use to notify your local fire code enforcement official. Use <u>Table 1</u> of this section to determine which model letter and attachment your dealership should

use. 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. ("C<sup>3</sup>") for TMS. To identify your local fire code enforcement official and the Appendix (i.e., A, B or C) that you should use to contact the appropriate official, go to Table 1 of this Section (starting at page 73). If the office you received your Tacoma LSC 90D approval from is not listed in Table 1, please call the C.L.E.A.N. Dealer EH&S Hotline at 877-572-4347.

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

### 2. 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 73) to see whether it has any additional building, zoning, or other requirements applicable to the CRC program and contact your local officials using the appropriate materials as indicated.

(Go to next page for summary of applicable State requirements.)

### I. SUMMARY OF APPLICABLE STATE REQUIREMENTS

### A) Fire Code

1. The B0D does not require a state fire permit under the applicable Illinois regulations. Depending on your location, Appendix A, B, or C contains a Determination of Compliance that the B0D complies with the locally adopted model fire codes<sup>13</sup> applicable to your dealership, 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 applicable local requirements do require you to inform the appropriate fire code enforcement official before commencing B0D operations at your dealership. See Table 1 (starting at pg. 73) 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 or 3 and 4 or 5 below (depending on your location), and any additional requirements contained in Table 1 (starting at p. 73) 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 and 4 or 5 (depending on your 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 additional assistance.

- 2. <u>Dealers outside the City of Chicago</u>: You should be able to conduct the B0D consistent with state and local fire codes so long as you conduct the B0D in the same location as the LSC 90D and continue to satisfy all of the following requirements:
  - a. Adequate ventilation in the area where the B0D will be conducted; and
  - **b.** No open flames or spark-producing equipment within 20 ft of the B0D operations; **and**
  - **c.** No drying, curing, or fusion apparatus within 20 ft of the B0D operations; **and**
  - **d.** 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**

<sup>&</sup>lt;sup>13</sup> Illinois dealerships are subject local fire prevention regulations, which are often based on model fire codes (such International Fire Code or Uniform Fire Code) (as identified in Table 1). Conformance to the requirements outlined above will ensure compliance with your locally adopted fire code.

- e. Materials applied to the truck frame include only Class III liquids and do not include any organic peroxide catalyst (Note: Each of the B0D materials that you are being provided – interior and exterior - satisfies this requirement); and
- **f.** Fire extinguishers rated "B", "AB", or "ABC" must be provided within 30 feet of your dealership's B0D spray space.
- 3. <u>Dealers in the City of Chicago</u>: 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 Tacoma LSC 90D and continue to satisfy all of the following requirements:
  - **a.** Conduct the B0D in an area that has been approved by the Chicago Bureau of Ventilation; and
  - **b.** Use no material with a flash point less than 37.8°C (100°F) (Note: Each of the B0D's CRC materials that you are being provided interior and exterior satisfies this requirement); **and**
  - c. 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
  - d. Take necessary steps to ensure that none of the following are located within 20 feet of the B0D operations: (i) open flames or sparkproducing equipment, or (ii) drying, curing, or fusion apparatus; and
  - **e.** Do not operate heaters within areas subject to accumulation of combustible deposits or residue from the B0D operations; **and**
  - **f.** Take necessary steps to ensure that the B0D is conducted in an acceptable area, which can be located in a portion of your service garage that is set up consistent with the requirements described in the Technical Instructions; **and**
  - g. Post a "No Smoking" sign in the B0D work area; and
  - **h.** Post a "Flammable Keep Fire Away" sign on the outside of any location where the B0D Materials are stored.

<u>Note</u>: 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.

<u>Technical Note</u>: If you have a question about whether your plans for conducting the B0D will satisfy any of these requirements, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

- 4. Material Storage Requirements for All Dealers Outside the City of Chicago and outside the City of Elgin: 14 Both CRC materials are considered Class IIIB combustible liquids 15 and the amount of materials that you will use during the B0D should not trigger any new combustible liquid storage requirements for your dealership. However, as a best management practice, please store the CRCs consistent with guidelines below:
  - a. DO NOT store more than 25 gallons of the CRC materials and any other regulated flammable or combustible materials in any one fire area; otherwise you may be subject to additional requirements; or
  - b. If you store more than 25 gallons of regulated flammable or combustible liquid in any one fire area, then you must use a fire cabinet.
    - (1) A single fire cabinet may hold up to 120 gallons.
    - (2) Your dealership may only have up to three fire cabinets in each fire area, each of which may hold up to 120 gallons. If you store at these levels (3 x 120 gals = 360 gals) you should confirm with your appropriate fire code enforcement official that such storage at these level does not require an operational permit in your locality.
- 5. <u>Material Storage Requirements for Dealers in the City of Chicago</u>: The CRC materials should not trigger any new "flammable" liquid storage requirements under the City of Chicago Code; However, as a best management practice, please store the CRC materials consistent with the guidelines below:
  - **a.** You must store these materials in a fire cabinet.
  - b. In total, you must not store more than 60 gallons of Class I or II materials (including any remaining X128T Tacoma LSC 90D material), and 120 gallons of Class III materials (including the 712AM (from either campaign) and the B0D Noxudol 300 S material).

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<sup>&</sup>lt;sup>14</sup> See Table 1 starting at page 61 for storage requirements in Elgin.

<sup>&</sup>lt;sup>15</sup> As defined by NFPA 1 and the IFC adopted by certain Illinois jurisdictions, both the 712AM (Flash point >392° F) and Noxudol 300 S (Flash point 285° F) are Class IIIB combustible liquids.

### B) **Building Code**<sup>16</sup>

1. The B0D should not require a building permit under your relevant local 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 73.<sup>17</sup>

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

- (i) complies already with building code requirements (for example, it is assumed that your dealership has a valid certificate of occupancy, meets the requirements for fire protection specified for repair garages and meets the mechanical ventilation requirements specified for repair garages); and
- (ii) does not require any building, electrical, gas, plumbing or mechanical system modifications for the B0D.
- If these assumptions do not apply, please go to the C.L.E.A.N. Dealer website (<a href="http://cleandealer.com">http://cleandealer.com</a>) or call the EH&S Hotline (877-572-4347)

<sup>1</sup> 

<sup>&</sup>lt;sup>16</sup> In accordance with Public Act 096-0704 all new commercial construction in Illinois after July 1, 2011 must comply with the 2006 or later editions of the International Building Code; International Existing Building Code; International Property Maintenance Code and the 2008 or later edition of the National Electrical Code (NFPA 70). However, this does not apply to any area that has adopted its own building code and registered that code adoption with the Capital Development Board (CDB) in accordance with the Illinois Building Commission Act. This new regulation is not expected to impact your B0D operations.

<sup>&</sup>lt;sup>17</sup> In particular, the application of the CRC materials being used for the B0D should not trigger any requirements for changes or modifications to the electrical wiring. These liquids are not flammable and are not expected to create a flammable vapor area and any overspray will be controlled with temporary partitions.

#### II. SUMMARY OF APPLICABLE LOCAL REQUIREMENTS

<u>Table 1</u> below identifies the local requirements applicable to the Tundra B0D (if any) and the Appendix (A, B or C) that contains the appropriate materials to use to notify your local fire code enforcement official that your dealership will conduct the B0D. 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 73), PLEASE GO TO THE C.L.E.A.N. DEALER WEBSITE* (<a href="http://cleandealer.com">http://cleandealer.com</a>) OR CALL THE EH&S HOTLINE (877-572-4347). The sections below briefly review these requirements.

<u>Regulatory Note – Regarding Conditional Use Permits</u>: 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 (<a href="http://cleandealer.com">http://cleandealer.com</a>) or call the EH&S Hotline (877-572-4347).

<u>Regulatory Note – Other Generally Applicable Local Laws and Regulations</u>: 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 Appendices A, B, or C can be used for that purpose as well.

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Table 1: Code Summary for Illinois Locations

	Local Fire Code	
Location	Official	Other Local Requirements
Illinois		Illinois does not adopt a Fire Code at the State level beyond the NFPA Life Safety Code,
(State)		which does not contain requirements specific to the B0D.
	Mark Harris	You must conduct your B0D operations in an enclosed building.
!	Deputy Fire Chief 333 East 20 <sup>th</sup> Street, Alton. II 62002	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
AITON DAVE MUNGENAST ALTON	(618) 463-3565	Contact
тоуот	IFC Jurisdiction <sup>18</sup> -	George Carter, Supervisor Building & Zoning
	Materials to contact	101 E 3rd Street
	found in Appendix A.	Alton, IL 62002 (618) 463-3533
	Mark R. Huber	You should verify that the B0D will not constitute a change in use or impermissible use under
	Director, Planning &	your zoning permit.
	Code Enforcement	
	Dept. (PACE)	Contact
	City of Bloomington	
	Building Safety	David Hales, City Manager
	Division	Planning & Zoning
Bloomington	P.O. Box 3157	109 E. Olive Street
DENNISON	Bloomington, IL 61702	Bloomington, IL 61701 (309) 434-2503
	(309) 434-2226	
	IFC Jurisdiction <sup>19</sup> - Materials to contact the local fire official are found in Appendix A.	

<sup>18</sup> This jurisdiction also adopts the BOCA Fire Code. The BOCA Code is not expected to impose additional requirements on your dealership's B0D operations.

<sup>&</sup>lt;sup>19</sup> This jurisdiction also adopts the BOCA Fire Code. The BOCA Code is not expected to impose additional requirements on your dealership's B0D operations.

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Location	Local Fire Code Official	Other Local Requirements
	Jim Keener Deputy Chief Bourbonnais Fire	If you intend to store the B0D materials outside, they must be stored in covered, sealed containers.
	Protection District, 1080 Armour Road Bourbonnais, IL 60914	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
BOULDONNAIS BRUCE	(815) 935-9670	Contact
тоуота	IFC/NFPA Jurisdiction <sup>20</sup> –	Denise Gonia, Code Enforcement Officer Building Department / Code Enforcement 700 Main Street NW
	Materials to contact the local fire official are in <b>Appendix B</b> .	Bourbonnais, IL 60914 (815) 937-3575
	George Michehl Deputy Fire Marshal Buffalo Grove Fire	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may apply.
	1051 Highland Grove	Your B0D operations must be conducted inside an enclosed building.
Buffalo	Buffalo Grove, IL 60089	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Grove- ARLINGTON	(847) 537-0995	Contact
ТОУОТА	Adopts the 2006 International Fire Code. Materials to contact the local fire official are found in Appendix A.	Carol Berman, Deputy Building Commissioner Building & Zoning 50 Raupp Boulevard Buffalo Grove, IL 60089 (847) 459-2530

74

<sup>20</sup> This jurisdiction also adopts the BOCA Fire Code. The BOCA Code is not expected to impose additional requirements on your dealership's B0D operations.

	Local Fire Code	
Location	Official	Other Local Requirements
	Steve Williams, Deputy Chief	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area or "Other Flood Area" and comply with any additional
	Calumet City Fire	requirements that may apply.
	Department 684 Wentworth	
	Avenue Calumet City, IL 60409	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Calumet City RIVER OAKS	(708) 891-8145	Contact
ТОУОТА	IFC Jurisdiction - Adopts the 2003	James J. Gigliotti, Coordinator Community and Economic Development Department
	International Fire	204 Pulaski Road
	code. Materials to contact the local fire	Calumet City, IL 60409 (708) 891-8140
	official are found in Appendix A.	
	Asif Rahman	If your dealership <u>did not participate in the Tacoma LSC 90D</u> or <u>will not conduct the</u> Tundra B0D in the same spray space as the Tacoma LSC 90D, please go to the
	Asst. Chief, Fire Prevention Engineer	C.L.E.A.N. Dealer website (http://cleandealer.com), or call the EH&S Hotline (877-572-
Chicago—	Bureau of Fire	
TOYOTA ON WESTERN;	444 North Dearborn Street	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may
GROSSINGER CITY	Chicago, IL 60654-	apply.
TOYOTA; MIDTOWN	5602 (312) 744-1874	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
TOYOTA; CHICAGO	Chicago Fire Code Jurisdiction - Chicago	Contact
TOYOTA	has adopted its own fire code applicable to	Patricia A. Scudiero, Zoning Administrator
	your dealership.	121 N. LaSalle Avenue - Room 905
		Chicago, II 60602 (312) 744-5777

	Local Fire Code	
Location	Official	Other Local Requirements
	Jerry Larsen,	You should verify whether or not the location where you will conduct the B0D is located within
	Bureau Chief	a designated special flood hazard area and comply with any additional requirements that may
	Fire Prevention	apply.
	City of Crystal Lake	
	Fire Rescue	You should verify that the B0D will not constitute a change in use or impermissible use under
	Department	your zoning permit or in the zoning district where your dealership is located.
	100 W Woodstock	
	Street	Contact
	Crystal Lake, IL 60014	
Crystal Lake		Latika Bhide, Planner
FAULT	(815) 356-3640	Department of Planning
4 0 0		100 W. Woodstock Street
	IFC Jurisdiction -	Crystal Lake, IL 60014
	Adopts the 2006	(815) 459-2020
	International Fire	
	Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix A.	

	Local Fire Code	
Location	Official	Other Local Requirements
	Lyle Meador,	The B0D materials should be added to the site safety plan required by the City Code for your
	Fire Marshal	dealership.
	Fire Prevention	
	Decatur Fire	You should verify whether or not the location where you will conduct the B0D is located within
	Department	a designated special flood hazard area and comply with any additional requirements that may
	1415 N. Water Street	apply.
Decatur—	ספממו, וב סבטבט	You should verify that the BOD will not constitute a change in use or impermissible use under
CROWN	(217) 424-2811	your zoning permit.
TOYOTA		
	IFC Jurisdiction -	Contact
	Adopts the 2006	
	International Fire	Susan Stickle, Senior Planner
	Code. Materials to	Planning Division
	contact the local fire	1 Gary K. Anderson Plaza
	official are found in	Decatur, Illinois 62523
	Appendix A.	(217) 424-2786
	Lieutenant Carl	You should verify that the B0D will not constitute a change in use or impermissible use under
	Froehlich	your zoning permit.
	DeKalb Fire	
	Department	Contact
	200 S. Fourth Street	
	Dekalb, IL 60115	Planning and Zoning
		233 S. Fourth Street, Suite A
Dekalb— BRIAN BEMIS	(815) 748-8457	DeKalb, II 60155 (815) 748-2060
TOYOTA	IFC Jurisdiction -	
	Adopts the 2006	
	International Fire	
	Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix A.	

Location	Local Fire Code Official	Other Local Requirements
	Tim Shipman, Chief Dixon Fire Department 220 S. Hennepin	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may apply.
	Street Dixon, IL 61021	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Dixon— KEN NEI SON	(815) 288-3323	Contact
ТОУОТА	IFC Jurisdiction - Adopts the 2003 International Fire	121 W. Second Street Dixon, IL 61021 (815) 288-3381
	contact the local fire official are found in Appendix A	
	Lt Joseph Nieman Fire Prevention	You may not store any raw or waste materials, including the B0D Materials, outdoors.
	Bureau Effingham Fire	Your B0D operations must be conducted in an enclosed building.
	Department 505 W. Fayette	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may
Effingham DAN HECHT	Avenue Effingham, IL 62401	apply.  Contact
CHEVY/ TOYOTA	(217) 342-2555 BOCA Jurisdiction -	Bruce Devall, Building Official 201 E. Jefferson Avenue
	Adopts the BOCA Basic Fire Prevention Code Materials to	Effingham, IL 62401 (217) 342-5300
	contact the local fire official are found in Appendix A.	

Cocation	Local Fire Code Official	Other Local Requirements
	Richard Dunne	You should store the B0D materials consistent with Tacoma LSC 90D materials in a
	Fire Marshal	code-compliant flammable materials storage cabinet (e.g., a fire cabinet), regardless of
	Fire Prevention	quantity.
	Bureau	
	Elgin Fire Department	B0D operations must be conducted in an enclosed building.
	550 Summit Street	
	Elgin, IL 60120	Contact
Elgin—ELGIN	0074 6400	Townstand Disciplination
ТОУОТА	047) 331-0130	Planning & Neighborhood Services
	IFC Jurisdiction -	150 Dexter Court
	Adopts the 2003 IFC	Elgin, Illinois 60120
	with local	(847) 931-5909
	amendments.	
	Materials to contact	
	the local fire official are	
	found in Appendix A.	
		Your dealership should continue to post Hazard Identification placards in the following
	Michael D. Kopp	locations: (1) on the exterior walls of your facility, and (2) on each door to the room or area
	Fire Chief	where the B0D materials are used or stored. Note: If there are numerous areas where
	City of Elmhurst Fire	
	Department	These placards should have the following DOT numbers on them: Fire Hazard (Red) - 2;
	209 N. York Street	Health Hazard (Blue) – 1; Reactivity (Yellow) – 0; Specific Hazard (White) – D
	Elmhurst, IL 60126	
	(000)	You must store the B0D materials within a completely enclosed building.
Elmhurst—	Ph: (630) 530-3029	
ELMHURST		You should verify that the B0D will not constitute a change in use or impermissible use under
TOYOTA	IFC/NFPA	your zoning permit.
	the 2003 International	Contact
	Fire Code and NFPA	
	Fire Code. Materials to	Than Werner, Planning & Zoning Administrator
	contact the local fire	Planning and Zoning
	official are found in	209 N. York Street
	Appendix A and	EIMNUST, IL 60'126 (630) 530 6910
	Appendix B.	8100-056 (050)

-	Local Fire Code	
Location	Omicial	Other Local Requirements
	Dave Becker	Your dealership is potentially subject to additional local air requirements. Please see the Air
	Fire Marshal	Regulations Section of the Dealer Package for additional details.
	Fox Lake Fire	
	Department	You must store the B0D materials within a completely enclosed building.
	306 Washington Street	
	Ingleside, IL 60041	You should verify that the B0D will not constitute a change in use or impermissible use under
		your zoning permit.
Fox Lake—	(847) 587-3312	
FOX LAKE		Contact
TOYOTA	IFC Jurisdiction -	
	Adopts the 2006	Bill Hart, Building Commissioner
	International Fire	Fox Lake Building Department
	Code. Materials to	66 Thillen Drive
	contact the local fire	Fox Lake, Illinois 60020
	official are found in	(847) 587-3176
	Appendix A.	
	Captain Dan Foley	You should verify that the B0D will not constitute a change in use or impermissible use under
	Galesburg Fire	your zoning permit.
	Department	
	Fire Prevention	Contact
	Bureau	
	150 South Broad	Roy Parkin, Director
	Street	Community Development Department
	Galesburg, IL 61401	55 W. Tompkins Street
Galesburg—		P.O. Box 1387
GALESBURG	(309) 345-3756	Galesburg, IL 61402-1387 (300) 345-3652
5	IFC Jurisdiction -	
	Adonts the 2000	
	International Fire	
	Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix A.	

Location	Local Fire Code	Other Local Requirements
Hodgkins – CONTINENTA L TOYOTA	Joseph T. Lyons Fire Marshal Pleasantview Fire Protection District 1970 W. Plainfield Road Le Grange Highlands, IL 60525 (708) 352-3021	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.  Contact  Sharon Wells Hodgkins Village Hall 8990 Lyons Street Hodgkins, IL 60525 (708) 579-6700
	Adopts the International Fire Code. Materials to contact the local fire official are found in Appendix A.	
	Kevin Gahr Building Inspector Joliet Town Hall 150 West Washington Street, Joliet, II 60432	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Joliet— THOMAS TOYOTA	(815) 724-4146  IFC Jurisdiction - Adopts the International Fire	Donald Fisher Planning-Zoning 150 West Jefferson Street Joliet, IL 60432 (815) 724-4050
	Code. Materials to contact the local fire official are found in Appendix A.	
Libertyville— LIBERTYVILLE TOYOTA	Ken Komers Asst. Fire Chief Fire Prevention	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.

	Local Fire Code	
Location	Official	Other Local Requirements
	Bureau	Contact
	Libertyville Fire	
	Department	Planning Division
	1551 N. Milwaukee	200 E. Cook Avenue
	Avenue	Libertyville, II 60048
	Libertyville, IL 60048	(847) 918-2028
	(847) 362-5664	
	1000 100 (110)	
	IFC/NFPA	
	Jurisdiction - Adopts	
	the 2006 International	
	Fire Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix B.	
	Clyde Heineman, Lt.	You should verify whether or not the location where you will conduct the B0D is located within
	Fire Prevention	a floodway or flood fringe and comply with any additional requirements that may apply.
	Bureau	
	Lincolnwood Fire	You should verify that the B0D will not constitute a change in use or impermissible use under
	Department,	your zoning permit.
	6900 N. Lincoln	
	Avenue	Contact
Lincolnwood	Lincolnwood, IL 60712	
GROSSINGER	(847) 745-4764	Ilmotny IVI. Clarke, Community Development Director Village of Lincolnwood
T H C C N		6900 N. Lincoln Avenue
	IFC/NFPA	Lincolnwood, IL 60712
	Jurisdiction - Adopts	(847) 673-7402
	the 2006 International	
	Fire Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix B.	

Location	Local Fire Code Official	Other Local Requirements
	Jerry Howell Fire Marshal Bureau of Fire Prevention	In addition to providing the materials in Appendix A to the Fire Marshal, you should submit three (3) sets of the materials found in Appendix A of this guide to the Lombard Building Division.
	Lombard Fire Department 255 E. Wilson Avenue Lombard, IL 60148	You should verify that the location where you will conduct the B0D not located in a "Zone A" area (a FEMA designation); otherwise you will need to comply with applicable requirements, which may include development permitting.
	(630) 620-5761	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Lombard— LOMBARD	Building Division 255 E Wilson Ave	Contact
ТОУОТА	Lombard, IL 60148-3926	Janet Downer, Administrative Coordinator Community Development Department 255 E. Wilson Avenue
	<b>IFC Jurisdiction -</b> Adopts the 2000 International Fire	Lombard, IL 60148 (630) 620-5746
	Code. Materials to contact the local fire official are found in	
	Appendix A.	
	Andy Taylor, Fire Chief City of Macomb Fire	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Macomb—	Department 219 W. Jackson Street Macomb, IL 61455	Contact
WOODRUM TOYOTA OF	(309) 836-7800	Ed Basch, Community Development Coordinator Building and Zoning Office
	<b>IFC Jurisdiction -</b> Adopts the 2006	232 L. 3ackson Street Macomb, Illinois 61455 (309) 833-4944
	International Fire Code. Materials to	

Location	Local Fire Code Official	Other Local Requirements
	contact the local fire official are found in Appendix A.	
	Jack Reed Fire Chief Marion Fire Department 204 N. Court Street	You should verify whether or not the location where you will conduct the B0D is located within a Flood Plain Overlay or Airport Overlay district and comply with any additional requirements that may apply.
Marion— MARION TOYOTA	Marion, IL 62959 (618) 997-5730	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
	Jurisdiction -  Materials to contact the local fire official are found in Appendix B.	Brian Fisher, Building Codes Enforcement Officer 1102 Tower Square Marion, IL 62959 (618) 997-7946
Matteson— PLANET TOYOTA	Lt. Sam Anello Matteson Fire Department, Attention: Fire Prevention Bureau, 4900 Village Commons, Matteson, IL 60443	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.  Contact  Ryan Franklin, Planner 4900 Village Commons Matteson, IL 60443 (708) 283-4900
	Jurisdiction - Adopts the 2003 International Fire Code. Materials to contact the local fire official are found in	

Location	Local Fire Code Official	Other Local Requirements
	Ed Vize	You should verify whether or not the location where you will conduct the B0D is located within
	Fire Marshal	a designated floodplain and comply with any additional requirements that may apply.
	Moline Fire	
	Department	You should verify that the B0D will not constitute a change in use or impermissible use under
	Moline, IL 61265	your solling politics.
		Contact
	(309) 736-5685	
Moline—		Jeff Anderson, City Planner
HILAND	IFC/ NFPA	Community Development Division
TOYOTA	Jurisdiction - Adopts	619 16th Street
	the 2003 International	Moline, IL 61265
	Fire Code and also	(309) 797-0490
	follows NFPA Fire	
	Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix B.	
		In addition to the culturing to the Fire Denominate we have the fire
	Cnlet	materials round in Appendix A of this guide to the Mt. Vernon inspection and
	Mt. Vernon Fire	Engineering Department.
	Department	
	1100 Main Street	You should verify whether or not the location where you will conduct the B0D is located within
	Mt Vernon, IL 62864	a designated special flood hazard area and comply with any additional requirements that may
,	(618) 242-6883	арріу.
Mt. Vernon—		You should verify with the Inspection and Engineering Department that the B0D will not
TOYOTA	John Porter	constitute a change in use or impermissible use under your zoning permit.
5	City Engineer, Chief	
	Building Inspector	Contact
	City of Mt. Vernon	
	Inspection and	John Porter, City Engineer
	Engineering	1100 Main Street, Room 204
	Department	Mt. Vernon, IL 62864
	1100 Main Street	(618) 242-6830
	PO BOX 1/08	

Location	Local Fire Code Official	Other Local Requirements
	Mt. Vernon, IL 62864	
	618-242-6830	
	IFC Jurisdiction -	
	Adopts the 2006	
	International Fire Code Materials to	
	contact the local fire	
	official are found in	
	Appendix A.	
	John Mayers	Your dealership is potentially subject to additional local air requirements. Please see the Air
	Fire Prevention	Regulations Section of the Dealer Package for additional details.
	Supervisor	
	Naperville Fire	You should verify that the B0D will not constitute a change in use or impermissible use under
	Department	your zoning permit.
	Naperville, IL 60540	Contact
Naperville—		
TOYOTA OF	(630) 420-6146	City of Naperville Development Services
NAPERVILLE	IFC/NFPA	400 S. Eagle Street
	Jurisdiction - Adopts	Naperville, IL 60540
	the 2006 International	(630) 420-6082
	Fire Code, Materials to	
	contact the local life	
	Appendix B.	
North Dokin	Chris McGill	You should verify whether or not the location where you will conduct the B0D is located within
FORT'S	Fire Chief	a designated floodplain and comply with any additional requirements that may apply.
TOYOTA OF	North Pekin Fire	Vol. oboild vorify that the BOD will not each of other and in incompany in the BOD will not a make the second of t
PEKIN	Department 236 S. Main Street	You should verify that the BOD will not constitute a change in use of impermissible use under your zoning permit.

21 This jurisdiction also adopts the AIA Fire Code. The AIA Code is not expected to impose additional requirements on your dealership's B0D operations.

Location	Local Fire Code Official	Other Local Requirements
	North Pekin, IL 61554	
		Contact
	(309) 382-3604	
	150/AIA 1	Kenneth Williams, Zoning Officer
	- Materials to contact	North Pekin II. 61554
	the local fire official are	(309) 382-3464
	found in Appendix A.	
	Debbie Andrews	REMINDER: The City Code requires motor vehicle repair shops to have a business license.
	Director, Fire	
	Prevention and Public	You should verify whether or not the location where you will conduct the B0D is located within
	Education	a designated special flood hazard area and comply with any additional requirements that may
	Village of Northbrook  Fire Denartment	apply.
	740 Dundee Road	You should verify that the B0D will not constitute a change in use or impermissible use under
	Northbrook, IL 60062	your zoning permit.
Northbrook-		
NORTHBROO K TOYOTA	(847) 272-2141 x 7134	Contact
	IFC Jurisdiction -	Thomas R. Poupard, Director
	Adopts the 2006	Dept. of Community Planning
	International Fire	1225 Cedar Lane
	Code. Materials to	Northbrook, IL 60062 (847) 272 6060 - 42343
	official are found in	(041) Z1Z-5050, X4Z45
	Appendix A.	
	Lt. Gary Patrick	You should verify whether or not the location where you will conduct the B0D is located within
	Bureau	a designated special nood nazard area and comply with any additional requirements that may apply.
Oak Lawn—	4401 West 103rd	
DAK LAWN TOYOTA	Street Oak Lawn, IL 60453	You should verify that the BUD will not constitute a change in use or impermissible use under your zoning permit.
	:	
	(708) 499-7810	Contact

Location	Local Fire Code	Other Local Requirements
	IFC/NFPA Jurisdiction - Adopts the 2003 International Fire Code. Materials to contact the local fire official are found in Appendix B.	Building, Planning and Zoning 9446 S. Raymond Avenue Oak Lawn, IL 60453 (708) 422-8292
	Brian Bailey, Assistant Fire Chief O'Fallon Fire Department 255 S. Lincoln Avenue O'Fallon, IL 62269	When you renew your City of O'Fallon Business Registration license, you must inform the City Clerk of the B0D materials and the location where they are stored at your dealership.  You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may apply.
O'Fallon – NEWBOLD TOYOTA	(618) 624-4519  IFC Jurisdiction - Adopts the 2003 International Fire Code. Materials to contact the local fire official are found in Appendix A.	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.  Contact  Ted Shekell, Director Planning and Zoning 255 S. Lincoln Avenue O'Fallon, IL 62269 (618) 624-4500 x 4
Ottawa – BILL WALSH TOYOTA	Jeffrey A. Newbury Chief 301 W. Lafayette Street Ottawa, IL 61350 815-434-3785 IFC/NFPA 30 Jurisdiction –	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.  Contact  Mike Sutfin Building and Zoning Official 301 West Madison Street Ottawa, IL 61350 815-433-0161

Location	Local Fire Code Official	Other Local Requirements
	the local fire official are found in Appendix A.	
	Jim Erksen, Fire Marshal 200 East Wood Street, Palatine, Illinois 60067 P. (847) 358-7500	You should verify whether or not the location where you will conduct the B0D is located within a designated flood hazard area and comply with any additional requirements that may apply.  You should verify that the B0D will not constitute a change in use or impermissible use under
Palatine – ARLINGTON TOYOTA	IFC Jurisdiction - Adopts the 2009	Contact
	International Fire Code. Materials to contact the local fire official are found in <b>Appendix A</b> .	Ben Vyverberg, Director of Planning and Zoning Planning and Zoning Department 200 East Wood Street Palatine, Illinois 60067 Tel: (847) 359-9047 Fax: (847) 963-6247
	Kevin Plach Fire Marshal Park Ridge Fire Prevention Bureau	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may apply.
	Station 35, 901 W. Devon Street Park Ridge, IL 60068	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
Park Ridge— BREDEMANN TOYOTA	(847) 318-5286	Contact Tom Hoff, Zoning Administrator
	Adopts the 2003 International Fire Code. Materials to	505 Butler Place Park Ridge, IL 60068 847-318-5465
	contact the local fire official are found in Appendix A.	

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Location	Official	Other Local Requirements
	Emil Steinseifer	You should verify whether or not the location where you will conduct the B0D is located within
	Division Chief	a designated special flood hazard area and comply with any additional requirements that may
	Fire Prevention	apply.
	City of Peoria Fire	
	Department	You should verify that the B0D will not constitute a change in use or impermissible use under
	505 NE Monroe Street	your zoning permit.
	Peoria, IL 61603-3767	
		Contact
	(309) 494-8780	
		Peoria County Courthouse - Room 401
	IFC/NFPA	324 Main Street
A FOXOF	Jurisdiction - Adopts	Peoria, IL 61602
5	the 2006 International	(309) 672-6915
	Fire Code and	
	maintains the Peoria	
	Fire Department	
	Manual of Hazardous	
	Materials Standards	
	and Regulations.	
	Materials to contact	
	the local fire official are	
	found in Appendix B.	

Location	Local Fire Code Official	Other Local Requirements
	Tom Darnell Deputy Chief	You should verify that the location where you will conduct the B0D is not located in a floodplain area; otherwise additional material storage requirements may apply.
	City of Quincy Fire Department 906 Vermont Street Quincy, IL 62301	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit or in the zoning district where your dealership is located.
Quincy- SHOTTENKIRK TOYOTA	(217) 228-4459  IFC Jurisdiction - Adopts the 2000 International Fire	Chuck Bevelheimer, Director Planning & Development 730 Maine Street Quincy, IL 62301
	Code. Materials to contact the local fire official are found in Appendix A.	
	Frank J. Schmitt, Division Chief of Fire Prevention 204 South First Street	You should verify that the location where you will conduct the B0D is not located in a floodplain area; otherwise additional material storage requirements may apply.  You should verify that the B0D will not constitute a change in use or impermissible use under
	Rockford, IL 61104 (815) 987-5658	your zoning permit.  Contact
Rockford— ANDERSON TOYOTA	Jurisdiction - Adopts the 2003 International Fire Code and also follows NFPA Fire Code. Materials to contact the local fire official are found in Appendix B.	Reid Montgomery, Director Development, Building & Zoning 425 E. State Street Rockford, IL 61104 (815) 987-5600

-	Local Fire Code	
Location	Omicial	Otto I
	David Schumann	
	Fire Chief	under applicable ordinance.
	Fire Prevention	
	Bureau	You should verify whether or not the location where you will conduct the BUD is located within
	gou w. schaumburg	a designated special flood nazard area and comply with any additional requirements that may
	Road Schailmhilira II 60194	apply.
	(g) 11 (g	You should verify that the BOD will not constitute a change in use or impermissible use under
Schaumburg SCHAUMBURG	(847) 985-4452	your zoning permit.
TOYOTA		
	IFC Jurisdiction -	Contact
	Adopts the 2006	
	International Fire	Christopher Huff, Director
	Code. Materials to	Community Development
	contact the local tire	101 Schaumburg Court
	official are found in	Schaumburg Illinois 60193
	Appendix A.	(847) 923-4430
	Dale Simpson	You should verify that the B0D will not constitute a change in use or impermissible use under
	Chief, Fire Safety	your zoning permit.
	Division	
	Office of the City Fire	Contact
	Marshal	
	Room 315 Municipal	Mike Farmer
	Center West	Planning & Econ. Development
Springfield	Sud S. Seventh Street	800 E. Monroe Avenue Springfield 11 62701
GREEN	Optimigneta, in 027 01	Opinigned, it 02.01 (217) 789 2377
тоуота	(217) 789-2170	
	IFC/NFPA	
	Jurisdiction - Adopts	
	the 2006 International	
	Fire Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix b.	

Location	Local Fire Code Official	Other Local Requirements
	Lt. Brian Byrne Fire Prevention Bureau 112 N. 1st Avenue St. Charles, IL 60174	The B0D must be conducted inside an enclosed building.  You should verify whether or not the location where you will conduct the B0D is located within a Groundwater Protection Area (GPWA) and comply with any additional requirements that may apply.
St. Charles— ST. CHARLES TOYOTA	(630) 377-4458  IFC Jurisdiction - Adopts the 2003 International Fire Code. Materials to	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.  Contact  Rita Tungare, Director of Community Development
	contact the local fire official are found in Appendix A.	Planning Division 2 East Main Street St. Charles, IL 60174 (630) 377-4443
Tilton— TOYOTA OF DANVILLE	Village of Tilton Mayor's Office Attn: Wayne Dunavan, Chief, Tilton Fire Department 1001 Tilton Road Tilton, IL 61833 (217) 477-0801  IFC Jurisdiction - Adopts the 2003 International Fire Code. Materials to contact the local fire official are found in Appendix A.	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.  Contact Patty Marana, Director Tilton Public Works 1001 Tilton Road Tilton, II 61833 (217) 477-0800

	Local Fire Code	
Location	Official	Other Local Requirements
	Ken Dunn, Chief & Administrator, Fire Prevention Bureau.	You should verify whether or not the location where you will conduct the B0D is located within a designated special flood hazard area and comply with any additional requirements that may apply.
	Public Safety Building 17355 S. 68th Court Tinlev Park. IL 60477	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
		Contact
ORLAND	(708) 444-5200	
тоуота	IFC/BOCA	Mine Rowshi Planning Department
	Jurisdiction - Adopts the 2006 International	16250 S. Oak Park Avenue Tinley Park, IL 60477
	Fire Code. 22 Materials	(708) 444-5000
	to contact the local fire	
	official are found in <b>Appendix A</b> .	
	Michael Dilloy	Vol. should worlfy that the BOD will not constitute a change in use or improvingely and use under
	Fire Chief	Your Zoning permit.
	City of Urbana Fire	
	Department	Contact
	400 South Vine Street	
Irbana –	Urbana, IL 61801	Robert Myers Planning Manager
O'BRIEN TOYOTA OF	(217) 384-2421	400 S. Vine Street
URBANA	IFC Judisdiction -	Olbalia, IL 81801 (217) 384-2440
	Adopts the 2009	
	International Fire	
	Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix A.	

2 This jurisdiction also adopts the BOCA Fire Code. The BOCA Code is not expected to impose additional requirements on your dealership's B0D operations.

;	Local Fire Code	
Location	Official	Other Local Requirements
Waukegan—	Steven Lenzi	If you store more than 25 gallons of combustible materials inside (or 60 gallons outside),
CLASSIC	Fire Marshal	including the B0D materials, you will be required to obtain a storage permit. If you already
TOYOTA	Waukegan Fire	have a permit you may be required to amend it to account for the B0D materials.
	Department	
	1101 Belvidere Street Waukegan, IL 60085	You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.
	(847) 249-5410	Contact
	IFC/NFPA	Department of Planning and Zoning
	Jurisdiction -	100 N. Martin L. King, Jr. Avenue
	Materials to contact	Waukegan, IL 60085
	the local fire official are	(847) 625-6878
	found in Appendix B.	
	Doug Daniels	Your dealership is potentially subject to additional local air requirements. Please see the Air
	Fire Prevention	Regulations Section of the Dealer Package for additional details.
	Bureau Director	
	Westmont Fire	Your B0D operations must be conducted inside an enclosed building.
	Department	
	6015 South Cass	You should verify that the B0D will not constitute a change in use or impermissible use under
	Avenue	your zoning permit.
Westmont	Westmont, IL 60559	
OAKBROOK		Contact
TOYOT	(630) 981-6402	
WESTMONT		Planning and Zoning
	IFC Jurisdiction -	Village of Westmont
	Adopts the 2003	31 West Quincy Street
	International Fire	(630) 981-6254
	Code. Materials to	
	contact the local fire	
	official are found in	
	Appendix A.	

## **APPENDIX A**

Materials to Demonstrate Compliance with the International Fire Code ("IFC") as Adopted by Certain Illinois Local Jurisdictions

# **Compliance Information**

&

Materials to submit to the Appropriate Fire Code Enforcement Official

- Model Letter
- C<sup>3</sup> Determination of Compliance with the IFC 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)

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# Appendix A1: Illinois IFC Jurisdictions-Summary of Fire Code Requirements

- Your local jurisdiction is subject to a locally adopted version International Fire Code (IFC).
- 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 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 <a href="http://cleandealer.com">http://cleandealer.com</a>).
- Please note that the model letter and attachments refer to "CRC program" instead of the B0D campaign to ensure that the request for approval from your local fire code enforcement official covers not only the B0D but any CRC program that may be offered for Toyota vehicles in the future.

### You should do the following:

- Address the model letter to the appropriate fire code enforcement official and put it on your dealership's letterhead. (See Table 1 beginning at page 73.)
- Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
  - Service area where the CRC program will be conducted (Note: this should be the same location where you are/were conducting the Tacoma LSC 90D);
  - Storage area to be used for CRC materials; and
  - Ventilation system in the area where the CRC program will be conducted.
- Remember Enclose the following with the cover letter to the appropriate fire code enforcement official:
  - The **Determination of Compliance letter prepared by C**<sup>3</sup>, which includes a representative process description and MSDSs
  - The completed dealership information sheet from Appendix A2.

- Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.
- 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 a Locally Adopted Version of the International Fire Code, C<sup>3</sup> Determination of Compliance and Attached Representative Process Description and MSDSs

Electronic Copy of Letter and Attachments are available on the on the C.L.E.A.N. Dealer website - <a href="http://cleandealer.com">http://cleandealer.com</a>.

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# [DEALER LETTERHEAD]

[Insert Appropriate Local Fire Code Enforcement Official Contact Information from Table 1 on page 73]

Re: NOTIFICATION OF INTENT TO CONDUCT CORROSION-RESISTANT COMPOUND CAMPAIGN IN THE APPROVED SPRAYING AREA OF [LOCAL DEALERSHIP]

_	
Dear	•
Doai	•

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 (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 International Fire Code. This Determination of Compliance includes as attachments the Material Safety Data Sheets for the CRC materials and a representative process description. We believe this information demonstrates that the CRC program will be conducted in

accordance with all applicable laws, regulations, and other codes and complies with your previous approval of these operations at our dealership.

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

Sincerely,

## Attachments:

- C<sup>3</sup> Determination of Compliance with attached Representative Process Overview and CRC Material MSDSs
- Dealership Information Sheet

ATTACHMENT 1: DETERMINATION OF COMPLIANCE FROM COMMERCIAL CONSTRUCTION CONSULTING, INC. WITH ATTACHED REPRESENTATIVE PROCESS DESCRIPTION AND MSDSs

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September 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 International Fire Code in Illinois

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

This analysis is intended for use in those local Illinois jurisdictions that have adopted a version of the International Fire Code ("IFC") as published by the International Code Council ("ICC"). This analysis is based on the 2009 version of the IFC.

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

As discussed below, we have determined that the CRC program will be in compliance with the applicable provisions of the 2009 IFC. We have further determined that as long as the CRC program is conducted in the spray area previously approved for the LSC 90D, and in accordance with operational requirements of the IFC's vehicle undercoating exemption, then the CRC program qualifies for the exemption in Section 1504.2 and further approval should not be required.

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

## **Regulatory Analysis**

#### 2009 International Fire Code

Section 1504.2 of the 2009 IFC lists the locations in buildings where spray finishing operations may be conducted. The "Exception" notes that spraying operations using Class III combustible liquids are exempt from the provisions of Section 1504 when adequate ventilation is provided and where otherwise approved by the local fire official:

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



International Building Code. In other occupancies, spray-finishing operations shall be conducted in a spray room, spray booth, or spraying space approved for such use.

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

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

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

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

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

Very truly yours,

Doug Anderson

Manager, Code Advisory Group

Attachments

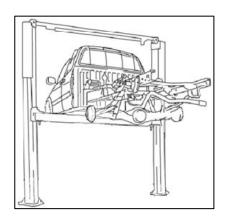
#### **TUNDRA BOD PROCESS OVERVIEW**

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

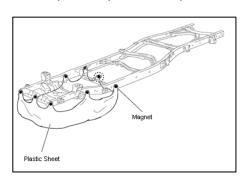
**Step 2: Vehicle Preparation.** Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

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

Tundra on Lift with Bed Removed



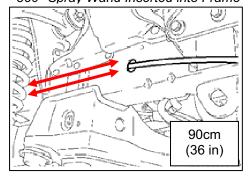
Attachment of Plastic Sheet to Capture any 712AM Drips



# **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.

360° Spray Wand Inserted into Frame



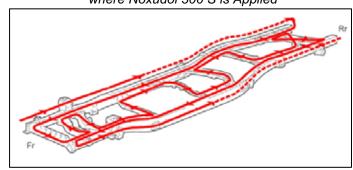
- Remove plastic sheet suspended from frame.
- Lower lift. Lower the lift until the top of the rear portion of the frame is approximately 4'6" above the floor.
- Apply Noxudol 300 S to top external surface of rear portion of frame.
  Set up Vaupel spray gun and locate unidirectional handheld spray nozzle 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.
- realiaen traek bea assembl

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.

Side and Bottom Surfaces of Frame where Noxudol 300 S is Applied

Top Surface of Rear Frame Portion Where Noxudol 300 S is Applied



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

# Material Safety Data Sheet

## PARKER INDUSTRIES

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

EMERGENCY CONTACT: CHEMTREC (800) 424-9300

# HMIS HAZARD RATING

HEALTH	1
FIRE	1
REACTIVITY	0
PERSONAL PROTECTION	В

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**

Component	Wt%	Recommended Exposure Limits (TWA)
Microcrystalline wax	5-10	ACGIH TLV: 2 mg/m <sup>3</sup>
CAS #64742-42-3		OSHA PEL: 2 mg/m <sup>3</sup>
Petroleum distillates, solvent dewaxed heavy paraffinic	5-15	ACGIH TLV: 5 mg/m <sup>3</sup>
CAS #64742-65-0		OSHA PEL: 5 mg/m <sup>3</sup>
Sulfonic acids, petroleum, Calcium salts, overbased CAS #68783-96-0	5-15 OSHA	ACGIH TLV: 5 mg/m³ (oil mist) PEL: 5 mg/m³ (oil mist)
White mineral oil, petroleum CAS #8042-47-5	50-60	ACGIH TLV: 5 mg/m³ (oil mist) OSHA PEL: 5 mg/m³ (oil mist)
Bentonite, quaternary ammonium compound modified CAS# 68953-58-2	0.3-1.0	Not established

712AM 3/17/2011 Page 1 of 4

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 <sup>3</sup> (respirable fraction) OSHA PEL: 15 mg/m <sup>3</sup> (total dust) ACGIH TLV: 10 mg/m <sup>3</sup> ( <sup>[2]</sup> nuisance dust)

<sup>[2]</sup> 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, CO<sub>2</sub>, 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.

712AM 3/17/2011 Page 2 of 4

#### 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:

Boiling Point (initial):

Evaporation Rate (n-Butyl Acetate=1):

Vapor Pressure (mmHg @ 20°C):

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.

712AM 3/17/2011 Page 3 of 4

#### **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:* 

**CHEMICAL** 

CAS NO.

WT %

NONE

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:* 

**CHEMICAL** 

CAS NO.

WT%

RQ/TPQ Lbs

**NONE** 

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

CHEMICAL

CAS NO.

WT %

Final RQ Lbs

NONE

#### **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:

**CHEMICAL** 

CAS NO.

Estimated Concentration %

NONE

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.

712AM 3/17/2011 Page 4 of 4



Last Updated April 18, 2011

# 1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S Synonyms: None

Product Codes: None Chemical Name: Anti Rust Compound

Product Use: Vehicle Underbody Coating

Manufacturer: Auson AB US Distributor: Soken Trade Corporation

Verkstadsgatan 3 12055 Sherman Way S-434 42 Kungsbacka North Hollywood, CA

Sweden USA

 www.auson.se
 www.noxudolusa.com

 PHONE:
 +46 300-562000

 (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** 

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

**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.



Last Updated April 18, 2011

# 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.



Last Updated April 18, 2011

# 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):

**MIMIMUM 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



Last Updated April 18, 2011

**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. CAS NO. CHEMICAL NAME

64741-88-4 Solvent-refined heavy paraffinic distillate

mg/m3

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

68783-96-0 PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE

AND CALCIUM CARBONATE DISPERSION

MG/M3

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

68410-37-7 FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID,

PENTAERYTHRITOL AND TALL OIL

MG/M3

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

8002-74-2 PARAFFIN AND HYDROCARBON WAXES

MG/M3

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

CALIFORNIA PROPOSITION 65: This product may contain trace quantities of chemicals that are identified by



Last Updated April 18, 2011

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.



Last Updated April 18, 2011

# 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



Last Updated April 18, 2011

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

Domestic (Land, D.O.T.), International (Water, I.M.O.), International (Air, I.C.A.O.)

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

Last Updated April 18, 2011

# 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!

Hazardous Material Information System (HMIS):	Health	1
	Flammability	1
	Reactivity	0
	Personal Protection	



Last Updated April 18, 2011

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)

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Part Number: --

Supersedes Date: March 1, 2011

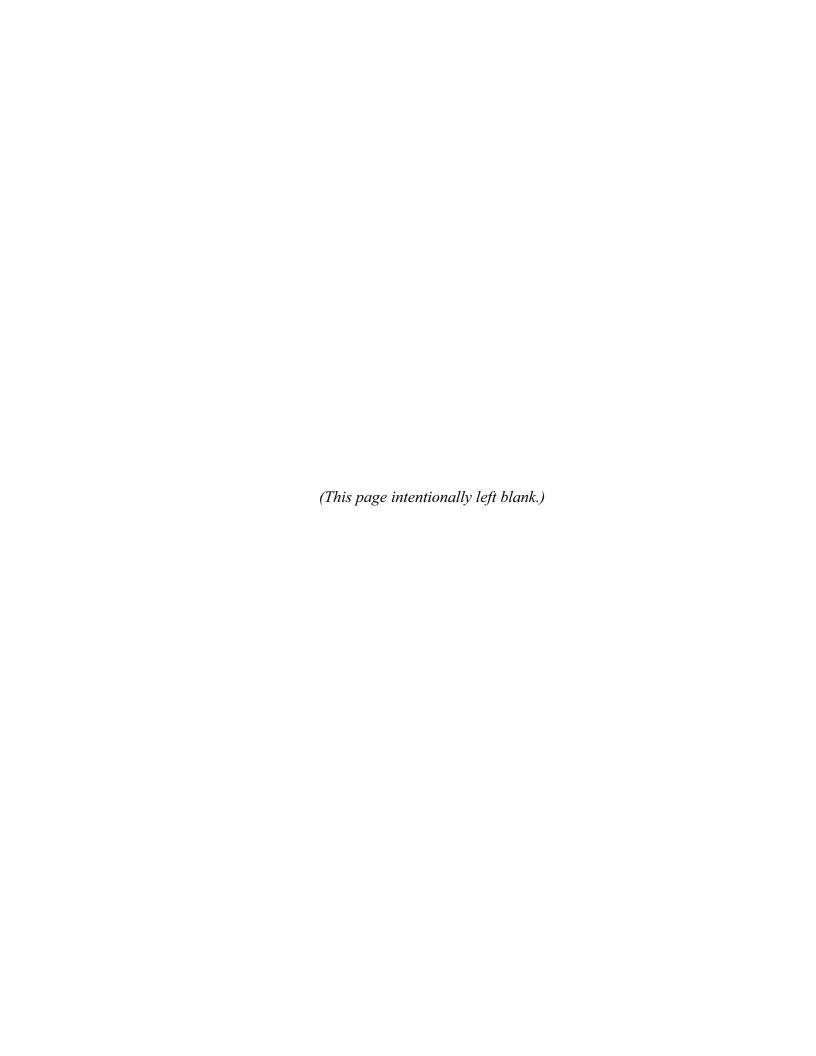
#### ADDITIONAL INFORMATION:

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** 



# 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.
<ul> <li>We will store CRC materials in accordance with applicable codes governing the storage of combustible liquids.</li> </ul>
Insert a description of the storage area to be used for CRC materials.
<ul> <li>We will ensure that the CRC program is conducted in an area that has adequate ventilation.</li> </ul>
Insert a description of the method of ventilation in the vehicle service area where the CRC program will be conducted.

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# **APPENDIX B**

# Materials to Demonstrate Compliance with the International Fire Code and NFPA 1

# **Compliance Information**

&

Materials to submit to the Appropriate Fire Code Enforcement Official

- Model Letter
- C<sup>3</sup> Determination of Compliance with the International Fire Code and NFPA 1 and Attached Representative Process Description and MSDSs
- Dealer Information Sheet

(Electronic copies or available on the C.L.E.A.N. Dealer website - <a href="http://cleandealer.com">http://cleandealer.com</a>)

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# Appendix B1: IFC/NFPA Jurisdictions - Summary of Fire Code Requirements

- Your local jurisdiction is subject to the International Fire Code (IFC) and Uniform Fire Code (NFPA 1) (an IFC/NFPA Jurisdiction).
- 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 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.
- Appendix B2 contains (1) a model letter, (2) a Determination of Compliance from Commercial Construction Consulting Inc. ("C<sup>3</sup>") 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 <a href="http://cleandealer.com">http://cleandealer.com</a>).
- Please note that the model letter and attachments refer to "CRC program" instead of the B0D campaign to ensure that the request for approval from your local fire code enforcement official covers not only the B0D but any CRC program that may be offered for Toyota vehicles in the future.

### You should do the following:

- Address the model letter to the appropriate fire code enforcement official and put it on your dealership's letterhead. (See Table 1 beginning at page 73.)
- Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
  - Service area where the CRC program will be conducted (Note: this should be the same location where you are/were conducting the Tacoma LSC 90D);
  - Storage area to be used for CRC materials; and
  - Ventilation system in the area where the CRC program will be conducted.
- Remember Enclose the following with the cover letter to the appropriate fire code enforcement official:
  - The **Determination of Compliance letter prepared by C**<sup>3</sup>, which includes a representative process description and MSDSs
  - The **completed dealership information sheet** from Appendix B2.
- Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.

 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 B2: Model Letter for Jurisdictions Subject to a Locally Adopted Version of the International Fire Code and NFPA 1, C<sup>3</sup> Determination of Compliance and Attached Representative Process Description and MSDSs

Electronic Copy of Letter and Attachments are available on the on the C.L.E.A.N. Dealer website - <a href="http://cleandealer.com">http://cleandealer.com</a>.

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# [DEALER LETTERHEAD]

[Insert Appropriate Local Fire Code Enforcement Official Contact Information from Table 1 on page 73]

# Re: NOTIFICATION OF INTENT TO CONDUCT CORROSION-RESISTANT COMPOUND CAMPAIGN IN THE APPROVED SPRAYING AREA OF [LOCAL DEALERSHIP]

D	
Dear	:

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 (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 International Fire Code and NFPA 1. 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:

- C<sup>3</sup> Determination of Compliance with attached Representative Process Overview and CRC Material MSDSs
- Dealership Information Sheet

ATTACHMENT 1: DETERMINATION OF COMPLIANCE FROM COMMERCIAL CONSTRUCTION CONSULTING, INC. WITH ATTACHED REPRESENTATIVE PROCESS DESCRIPTION AND MSDSs

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September 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 Uniform Fire Code & the International Fire Code in Illinois

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

This analysis is intended for use in those local Illinois jurisdictions that have adopted a version of the Uniform Fire Code ("NFPA 1") as published by the National Fire Protection Association ("NFPA"), which adopts NFPA 33, the Standard for Spray Application Using Flammable or Combustible Materials, and the International Fire Code ("IFC") as published by the International Code Council ("ICC"). This analysis is based on the 2009 versions of NFPA 1 (which adopts 2007 NFPA 33) and the 2006 IFC.

We understand that the CRC program is substantially similar to the Tacoma Limited Service Campaign 90D ("LSC 90D") that Toyota's Illinois dealers have been conducting in a previously approved spray area, with one important distinction – whereas the LSC 90D involves spray application of both a Class II and a Class IIIB combustible liquid to the underside of certain Toyota vehicles, the new CRC program will use the same (or a similar) Class IIIB combustible liquid for application to the interior of the frame, but will substitute a less combustible, Class IIIB liquid for the Class II liquid for application to the exterior of the frame. Thus, the new CRC program uses only Class IIIB combustible liquids. We further understand that the LSC 90D will conclude after December 31, 2011, and therefore, that Illinois 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 (2007) and the IFC (2006). 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's and IFC's vehicle undercoating exemptions, then the CRC program will qualify for the exemption in NFPA 33, Section 14.1, paragraph 14.1.1 and IFC Section 1504.2 and further approval should not be required.

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

### **Regulatory Analysis**

#### NFPA 33 (2007)

NFPA 33 Section 14.1 notes that vehicle spray undercoating operations conducted in an area with adequate ventilation are exempt from the provisions of NFPA 33 when adequate ventilation is provided and if certain operational requirements are met:

**Regulation:** *Section 14.1 (Automobile Undercoating and Body Lining):* 



- 14.1.1: 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 14.1.1.1 through 14.1.1.4 are met.
- 14.1.1.1: 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.
- 14.1.1.2: 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.
- 14.1.1.3: Any solvent used for cleaning procedures shall have a flash point not less than 100°F (37.8°C).
- 14.1.1.4: 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 14.1.1 and therefore qualifies for the undercoating exemption in NFPA 33: 1) Both materials to be used are Class IIIB combustible liquids; 2) Dealers are expected to apply the materials in the same spray area that already has been approved for a similar corrosion-resistant compound program known as the "LSC 90D"; and 3) Dealers also must maintain adequate ventilation in this approved spray area and otherwise conduct the CRC program in a manner that meets operational requirements of the NFPA 33's vehicle undercoating exemption.

#### **2009 International Fire Code**

Section 1504.2 of the 2009 IFC lists the locations in buildings where spray finishing operations may be conducted. The "Exception" notes that spraying operations using Class III combustible liquids are exempt from the provisions of Section 1504 when adequate ventilation is provided and where otherwise approved by the local fire official:

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

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

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

**Overall Analysis:** The requirements of the IFC for spraying spaces are similar to the provisions of NFPA 33 Section 14.1. In this case the provisions of NFPA 33 are more restrictive than those of the IFC



governing the spray application of Class IIIB liquids, so dealers subject to the IFC and NFPA will be instructed to conduct the CRC program consistent with the more restrictive NFPA 33 requirements.

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 14.1. 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.

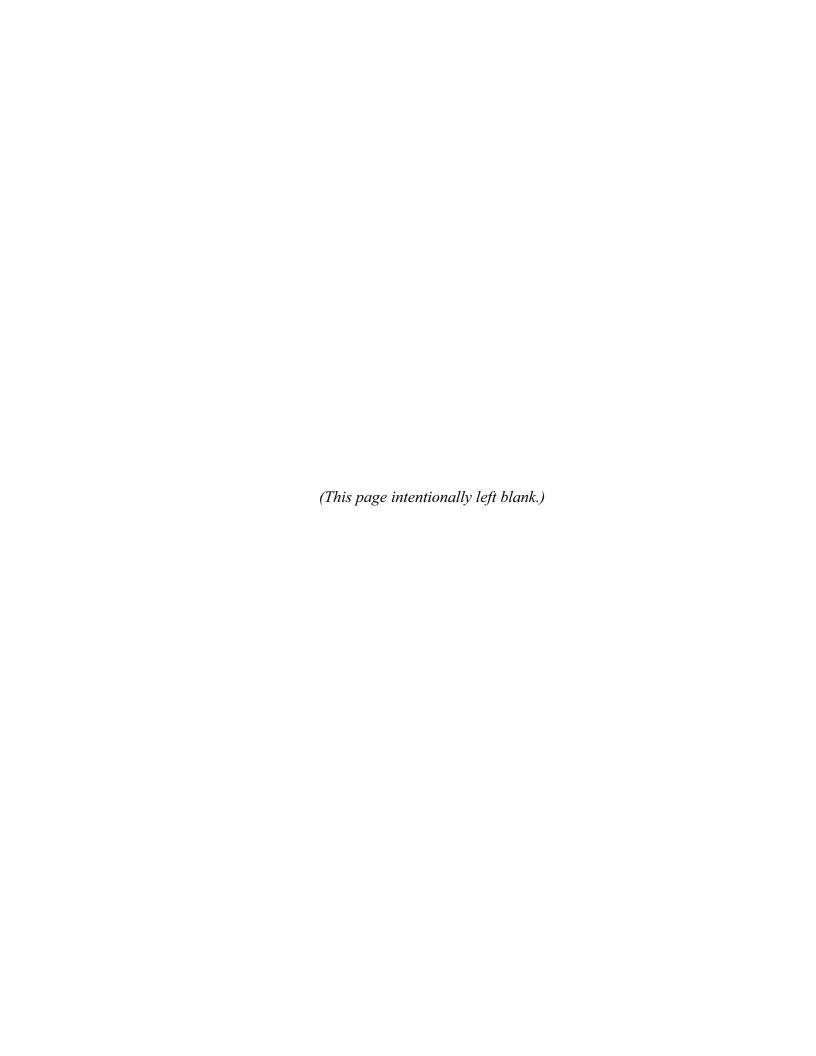
If you have any questions, please do not hesitate to call.

Very truly yours,

Doug Anderson

Manager, Code Advisory Group

Attachments



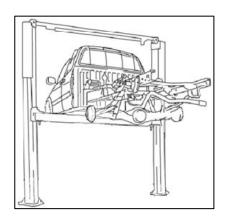
#### **TUNDRA BOD PROCESS OVERVIEW**

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

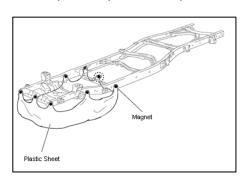
**Step 2: Vehicle Preparation.** Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

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

Tundra on Lift with Bed Removed



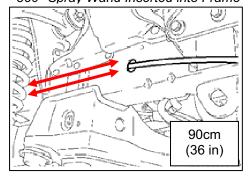
Attachment of Plastic Sheet to Capture any 712AM Drips



# **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.

360° Spray Wand Inserted into Frame



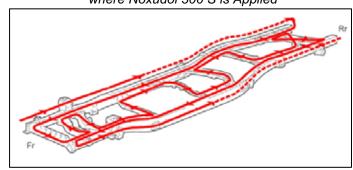
- Remove plastic sheet suspended from frame.
- Lower lift. Lower the lift until the top of the rear portion of the frame is approximately 4'6" above the floor.
- Apply Noxudol 300 S to top external surface of rear portion of frame.
  Set up Vaupel spray gun and locate unidirectional handheld spray nozzle 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.
- realiaen traek bea assembl

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.

Side and Bottom Surfaces of Frame where Noxudol 300 S is Applied

Top Surface of Rear Frame Portion Where Noxudol 300 S is Applied



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

# Material Safety Data Sheet

#### PARKER INDUSTRIES

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

EMERGENCY CONTACT: CHEMTREC (800) 424-9300

#### HMIS HAZARD RATING

HEALTH	1
FIRE	1
REACTIVITY	0
PERSONAL PROTECTION	В

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**

Component	Wt%	Recommended Exposure Limits (TWA)
Microcrystalline wax	5-10	ACGIH TLV: 2 mg/m <sup>3</sup>
CAS #64742-42-3		OSHA PEL: 2 mg/m <sup>3</sup>
Petroleum distillates, solvent dewaxed heavy paraffinic	5-15	ACGIH TLV: 5 mg/m <sup>3</sup>
CAS #64742-65-0		OSHA PEL: 5 mg/m <sup>3</sup>
Sulfonic acids, petroleum, Calcium salts, overbased CAS #68783-96-0	5-15 OSHA	ACGIH TLV: 5 mg/m³ (oil mist) PEL: 5 mg/m³ (oil mist)
White mineral oil, petroleum CAS #8042-47-5	50-60	ACGIH TLV: 5 mg/m³ (oil mist) OSHA PEL: 5 mg/m³ (oil mist)
Bentonite, quaternary ammonium compound modified CAS# 68953-58-2	0.3-1.0	Not established

712AM 3/17/2011 Page 1 of 4

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 <sup>3</sup> (respirable fraction) OSHA PEL: 15 mg/m <sup>3</sup> (total dust) ACGIH TLV: 10 mg/m <sup>3</sup> ( <sup>[2]</sup> nuisance dust)

<sup>[2]</sup> 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, CO<sub>2</sub>, 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.

712AM 3/17/2011 Page 2 of 4

#### 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:

Boiling Point (initial):

Evaporation Rate (n-Butyl Acetate=1):

Vapor Pressure (mmHg @ 20°C):

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.

712AM 3/17/2011 Page 3 of 4

#### **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:* 

**CHEMICAL** 

CAS NO.

WT %

NONE

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:* 

**CHEMICAL** 

CAS NO.

WT%

RQ/TPQ Lbs

**NONE** 

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

CHEMICAL

CAS NO.

WT %

Final RQ Lbs

NONE

#### **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:

**CHEMICAL** 

CAS NO.

Estimated Concentration %

NONE

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.

712AM 3/17/2011 Page 4 of 4



Last Updated April 18, 2011

#### 1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S Synonyms: None

Product Codes: None Chemical Name: Anti Rust Compound

Product Use: Vehicle Underbody Coating

Manufacturer: Auson AB US Distributor: Soken Trade Corporation

Verkstadsgatan 3 12055 Sherman Way S-434 42 Kungsbacka North Hollywood, CA

Sweden USA

 www.auson.se
 www.noxudolusa.com

 PHONE:
 +46 300-562000

 (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** 

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

**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.



Last Updated April 18, 2011

#### 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.



Last Updated April 18, 2011

#### 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):

**MIMIMUM 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



Last Updated April 18, 2011

**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. CAS NO. CHEMICAL NAME

64741-88-4 Solvent-refined heavy paraffinic distillate

mg/m3

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

68783-96-0 PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE

AND CALCIUM CARBONATE DISPERSION

MG/M3

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

68410-37-7 FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID,

PENTAERYTHRITOL AND TALL OIL

MG/M3

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

8002-74-2 PARAFFIN AND HYDROCARBON WAXES

MG/M3

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

CALIFORNIA PROPOSITION 65: This product may contain trace quantities of chemicals that are identified by



Last Updated April 18, 2011

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.



Last Updated April 18, 2011

#### 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



Last Updated April 18, 2011

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

Domestic (Land, D.O.T.), International (Water, I.M.O.), International (Air, I.C.A.O.)

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

Last Updated April 18, 2011

#### 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!

Hazardous Material Information System (HMIS):	Health	1
	Flammability	1
	Reactivity	0
	Personal Protection	



Last Updated April 18, 2011

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)

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Part Number: --

Supersedes Date: March 1, 2011

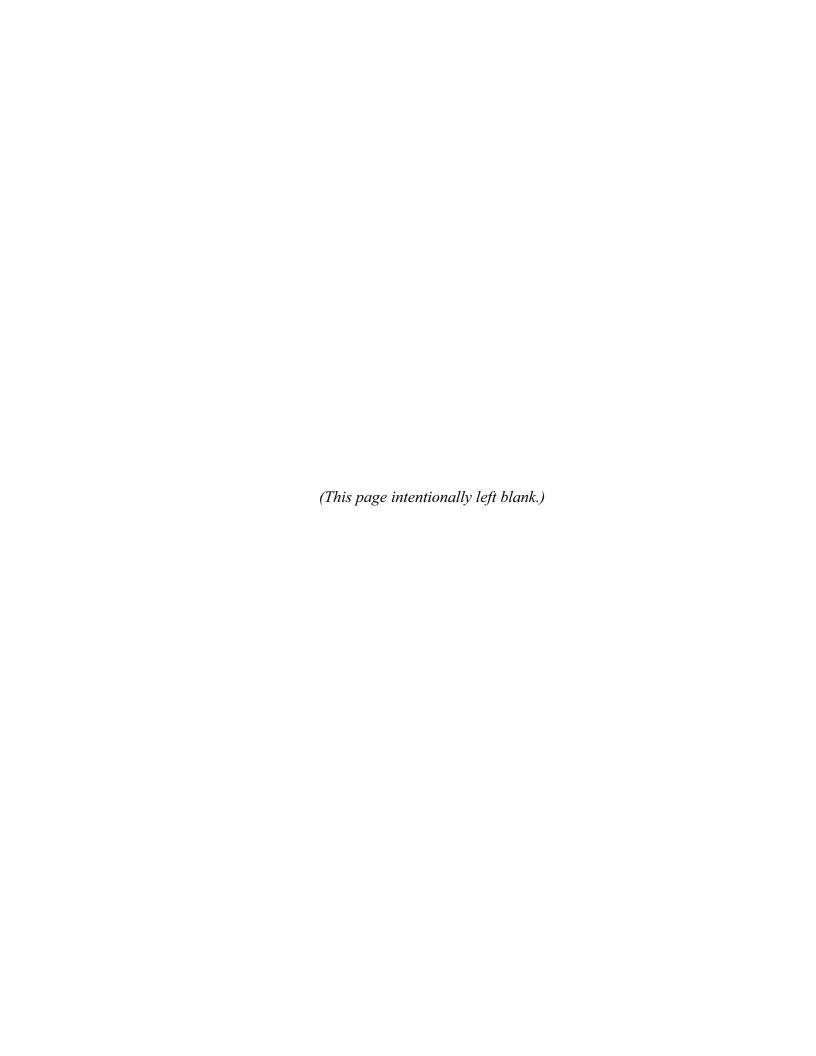
#### ADDITIONAL INFORMATION:

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** 



# 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.

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#### **APPENDIX C**

## Materials to Demonstrate Compliance with the Chicago Fire Code

### **Compliance Information**

&

Materials to submit to the Appropriate Fire Code Enforcement Official

- Model Letter
- C<sup>3</sup> Determination of Compliance with the Chicago Fire Code and Attached Representative Process Description and MSDSs
- Dealer Information Sheet

(Electronic copies or available on the C.L.E.A.N. Dealer website - <a href="http://cleandealer.com">http://cleandealer.com</a>)

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#### Appendix C1: Chicago Fire Code Jurisdictions-Summary of Fire Code Requirements

- Your local jurisdiction is subject to the Chicago Fire Code.
- Before you begin conducting the B0D, you will need to provide your local fire code
  enforcement official with information about this CRC program and your intent to
  conduct it in the same space where you are/were conducting the Tacoma LSC 90D.
  Under Chicago Fire Code, 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.
- Appendix C2 contains (1) a model letter, (2) a Determination of Compliance from Commercial Construction Consulting Inc. ("C<sup>3</sup>") 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).
- Please note that the model letter and attachments refer to "CRC program" instead of the B0D campaign to ensure that the request for approval from your local fire code enforcement official covers not only the B0D but any CRC program that may be offered for Toyota vehicles in the future.

#### You should do the following:

- Address the model letter to the appropriate fire code enforcement official and put it on your dealership's letterhead. (See Table 1 beginning at page 73.)
- Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
  - Service area where the CRC program will be conducted (Note: this should be the same location where you are/were conducting the Tacoma LSC 90D);
  - Storage area to be used for CRC materials; and
  - Ventilation system in the area where the CRC program will be conducted.
- Remember Enclose the following with the cover letter to the appropriate fire code enforcement official:
  - The Determination of Compliance letter prepared by C<sup>3</sup>, which includes a representative process description and MSDSs
  - The completed dealership information sheet from Appendix C2.

- Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.
- 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 C2: Model Letter for City Jurisdictions Subject to the Chicago Fire Code, C<sup>3</sup> Determination of Compliance and Attached Representative Process Description and MSDSs

Electronic Copy of Letter and Attachments are available on the on the C.L.E.A.N. Dealer website - <a href="http://cleandealer.com">http://cleandealer.com</a>.

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#### [DEALER LETTERHEAD]

[Insert Appropriate Local Fire Code Enforcement Official Contact Information from Table 1 on page 73]

Re: NOTIFICATION OF INTENT TO CONDUCT CORROSION-RESISTANT COMPOUND CAMPAIGN IN THE APPROVED SPRAYING AREA OF [LOCAL DEALERSHIP]

Dear	 :

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 (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 Chicago Fire Code. This Determination of Compliance includes as attachments the Material Safety Data Sheets for the CRC materials and a representative process description. We believe this information demonstrates that the CRC program will be conducted in accordance

with all applicable laws, regulations, and other codes and complies with your previous approval of these operations at our dealership.

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

Sincerely,

#### Attachments:

- C<sup>3</sup> Determination of Compliance with attached Representative Process Overview and CRC Material MSDSs
- Dealership Information Sheet

ATTACHMENT 1: DETERMINATION OF COMPLIANCE FROM COMMERCIAL CONSTRUCTION CONSULTING, INC. WITH ATTACHED REPRESENTIVE PROCESS DESCRIPTION AND MSDSs

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September 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 City of Chicago Municipal Code

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

This letter describes how the CRC program complies with the applicable fire and building code requirements in the City of Chicago.

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

As discussed below, we have determined that the CRC program will be in compliance with the applicable provisions of the Chicago Municipal Code. 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 the same operational safeguards, then further approval of the CRC program 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**

Chapter 15-24 of the Chicago Municipal Code governs flammable liquids and the spraying of such liquids. Flammable liquids are defined as follows:

**Regulation:** Chapter 15-24-020(d): Flammable Liquids. All flammable liquids shall be divided into three classes according to flashpoint as follows:

Class I. Liquids with a vapor pressure less than 40 pounds per square inch absolute at 100 degrees Fahrenheit and a flashpoint below 100 degrees Fahrenheit, 38 degrees centigrade as determined by the herein-required test.

Class II. Liquids with a vapor pressure less than 40 pounds per square inch absolute at 100 degrees Fahrenheit and a flashpoint above that for Class I and below 140 degrees Fahrenheit, 60 degrees centigrade, as determined by the herein-required test.



Class III. Liquids with a flashpoint above that for Class II and below 200 degrees Fahrenheit, 93 degrees centigrade.

**Analysis:** The material 712AM has a flash point of greater than 200°C (392°F), and is not classified as a flammable liquid (see attached MSDS).

**Analysis:** The material Noxudol 300 S has a flash point of 285°F (141°C), and is not classified as a flammable liquid (see attached MSDS)

Chapter 15-24-670 notes that undercoating spraying operations using flammable liquids are exempt from the provisions of the Code related to spraying operations when adequate ventilation is provided in accordance with Chapter 13-176, and where otherwise approved by the local fire official. However, because the CRC program does not use flammable liquids, it is not subject to the spray provision in Chapter 15-24, including the ventilation requirements in Chapter 15-24-670. Therefore 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, we recommend that the dealer obtain approval from the local fire official to conduct the CRC program in the new spray area.

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

Very truly yours,

Doug Anderson

Manager, Code Advisory Group

Attachments

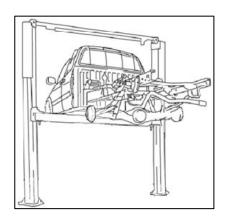
#### **TUNDRA BOD PROCESS OVERVIEW**

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

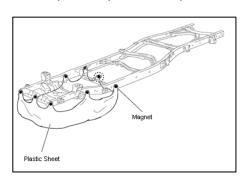
**Step 2: Vehicle Preparation.** Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

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

Tundra on Lift with Bed Removed



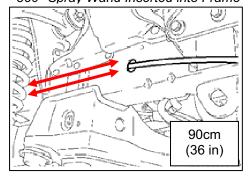
Attachment of Plastic Sheet to Capture any 712AM Drips



# **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.

360° Spray Wand Inserted into Frame



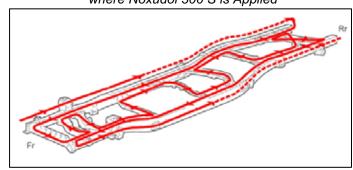
- Remove plastic sheet suspended from frame.
- Lower lift. Lower the lift until the top of the rear portion of the frame is approximately 4'6" above the floor.
- Apply Noxudol 300 S to top external surface of rear portion of frame.
  Set up Vaupel spray gun and locate unidirectional handheld spray nozzle 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.
- realiaen traek bea assembl

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.

Side and Bottom Surfaces of Frame where Noxudol 300 S is Applied

Top Surface of Rear Frame Portion Where Noxudol 300 S is Applied



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

# Material Safety Data Sheet

#### PARKER INDUSTRIES

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

EMERGENCY CONTACT: CHEMTREC (800) 424-9300

#### HMIS HAZARD RATING

HEALTH	1
FIRE	1
REACTIVITY	0
PERSONAL PROTECTION	В

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**

Component Microcrystalline wax CAS #64742-42-3	Wt% 5-10	Recommended Exposure Limits (TWA)  ACGIH TLV: 2 mg/m <sup>3</sup> OSHA PEL: 2 mg/m <sup>3</sup>
Petroleum distillates, solvent dewaxed heavy paraffinic CAS #64742-65-0	5-15	ACGIH TLV: 5 mg/m <sup>3</sup> OSHA PEL: 5 mg/m <sup>3</sup>
Sulfonic acids, petroleum, Calcium salts, overbased CAS #68783-96-0	5-15 OSHA	ACGIH TLV: 5 mg/m³ (oil mist) PEL: 5 mg/m³ (oil mist)
White mineral oil, petroleum CAS #8042-47-5	50-60	ACGIH TLV: 5 mg/m³ (oil mist) OSHA PEL: 5 mg/m³ (oil mist)
Bentonite, quaternary ammonium compound modified CAS# 68953-58-2	0.3-1.0	Not established

712AM 3/17/2011 Page 1 of 4

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 <sup>3</sup> (respirable fraction) OSHA PEL: 15 mg/m <sup>3</sup> (total dust) ACGIH TLV: 10 mg/m <sup>3</sup> ( <sup>[2]</sup> nuisance dust)

<sup>[2]</sup> 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, CO<sub>2</sub>, 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.

712AM 3/17/2011 Page 2 of 4

#### 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:

Boiling Point (initial):

Evaporation Rate (n-Butyl Acetate=1):

Vapor Pressure (mmHg @ 20°C):

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.

712AM 3/17/2011 Page 3 of 4

#### **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:* 

**CHEMICAL** 

CAS NO.

WT %

NONE

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:* 

**CHEMICAL** 

CAS NO.

WT%

RQ/TPQ Lbs

**NONE** 

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

CHEMICAL

CAS NO.

WT %

Final RQ Lbs

NONE

#### **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:

**CHEMICAL** 

CAS NO.

Estimated Concentration %

NONE

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.

712AM 3/17/2011 Page 4 of 4



Last Updated April 18, 2011

#### 1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S Synonyms: None

Product Codes: None Chemical Name: Anti Rust Compound

Product Use: Vehicle Underbody Coating

Manufacturer: Auson AB US Distributor: Soken Trade Corporation

Verkstadsgatan 3 12055 Sherman Way S-434 42 Kungsbacka North Hollywood, CA

Sweden USA

 www.auson.se
 www.noxudolusa.com

 PHONE:
 +46 300-562000

 (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** 

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

**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.



Last Updated April 18, 2011

#### 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.



Last Updated April 18, 2011

## 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):

**MIMIMUM 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



Last Updated April 18, 2011

**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. CAS NO. CHEMICAL NAME

64741-88-4 Solvent-refined heavy paraffinic distillate

mg/m3

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

68783-96-0 PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE

AND CALCIUM CARBONATE DISPERSION

MG/M3

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

68410-37-7 FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID,

PENTAERYTHRITOL AND TALL OIL

MG/M3

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

8002-74-2 PARAFFIN AND HYDROCARBON WAXES

MG/M3

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

CALIFORNIA PROPOSITION 65: This product may contain trace quantities of chemicals that are identified by



Last Updated April 18, 2011

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.



Last Updated April 18, 2011

## 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



Last Updated April 18, 2011

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

Domestic (Land, D.O.T.), International (Water, I.M.O.), International (Air, I.C.A.O.)

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

Last Updated April 18, 2011

## 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!

Hazardous Material Information System (HMIS):	Health	1
	Flammability	1
	Reactivity	0
	Personal Protection	



Last Updated April 18, 2011

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)

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Part Number: --

Supersedes Date: March 1, 2011

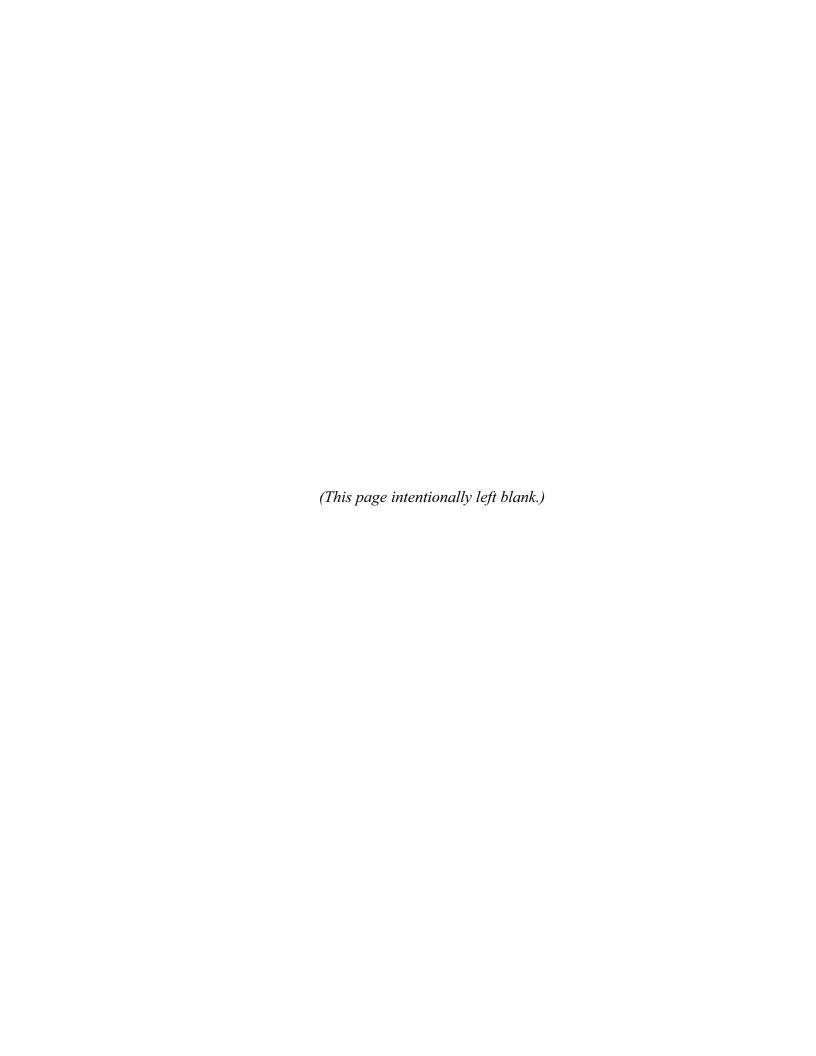
#### ADDITIONAL INFORMATION:

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** 



# 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.

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.
CRC program will be conducted.

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# ILLINOIS DEALER INFORMATION PACKET GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS

## HAZARDOUS WASTE MANAGEMENT SECTION

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 B0D Tarps and Partitions: If, as we assume, the LSC 90D and B0D are conducted in a common spray space, then the tarps/partitions used would be combined B0D-LSC 90D waste and, therefore, should be managed like other hazardous waste when you dispose of them. The weight of these tarps counts against the monthly hazardous waste management limits noted below. Given their size and weight, the tarps/partitions could represent a large quantity of waste if disposed of frequently and could impact your compliance with the limits noted below. Therefore, we recommend that you reuse the tarps and other materials used to create the partitions described in the **Technical Instructions**.

1. IF YOU ARE ALREADY A REGISTERED SMALL QUANTITY GENERATOR (SQG) (I.E., BECAUSE YOU GENERATE MORE THAN 220 POUNDS OF HAZARDOUS WASTE PER MONTH), YOU MAY STOP READING AS YOU ARE LIKELY ALREADY FAMILIAR WITH THE REQUIREMENTS NOTED BELOW. THE BOD WILL NOT IMPACT YOUR GENERATOR STATUS.

- 2. If you are a Conditionally Exempt Small Quantity Generator, rather than a Small Quantity Generator because you do not generate more than 220 pounds of hazardous waste per month or accumulate more than 2,200 pounds of hazardous waste at any time, the B0D should not impact your generator status (see note above).
  - a. Your dealership will not have to become a registered SQG (and thereby be subject to additional requirements) if you stay below the two registered SQG triggers:
    - (1) Generate no more than 220 pounds of hazardous waste in a calendar month; and
    - (2) Accumulate no more than 2,200 pounds of hazardous waste at any one time.

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

- 3. STORE ALL HAZARDOUS WASTES IN PROPER CONTAINERS WITH PROPER LABELS, AND MAINTAIN REQUIRED RECORDS.
- 4. DISPOSE OF ALL HAZARDOUS WASTE ONLY AT FACILITIES AUTHORIZED TO RECEIVE "HAZARDOUS" WASTE USING A COMPANY LICENSED TO TRANSPORT SUCH WASTE TO THE DISPOSAL FACILITY.
- 5. REMEMBER TO COUNT USED OIL AGAINST YOUR MONTHLY HAZARDOUS WASTE LIMIT IF YOU DETERMINE IT TO BE HAZARDOUS.
  - a. In Illinois, used oil generally must be managed as hazardous waste if it is:
    - (1) mixed with hazardous waste; and
    - (2) either (a) exhibits a hazardous waste characteristic or (b) contains a listed hazardous waste; and
    - (3) will not be recycled.
  - **b.** However, if you generate less than 220 pounds of hazardous waste in a calendar month, and non-halogenated hazardous waste is mixed with used oil, the hazardous waste/used oil mixture is regulated as used oil rather than as hazardous waste.
  - c. Such material regulated as used oil should be recycled in accordance with applicable used oil regulations. We assume that your dealership generates used oil, and therefore, is already familiar with the special hazardous waste recycling requirements for used oil.