

TOYOTA

TO: VERMONT TOYOTA 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

VERMONT DEALER INFORMATION PACKET

This bound volume contains two parts of the Vermont 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.

IMPORTANT – PLEASE READ

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DATE: 2011
RE: Information Packet for Tundra Corrosion-Resistant Compound Campaign B0D

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

VERMONT DEALER INFORMATION PACKET

Toyota is launching a Corrosion-Resistant Compound (CRC) Campaign for 2000-2003 model year (MY) Tundra vehicles registered in certain cold climate states with high road salt use ("Cold Climate States"). This Campaign consists of two components:

- (1) The next phase of Safety Recall 90M announced in November 2009 affecting the rear portion of the frame. Under this next phase, owners of covered vehicles will receive a CRC application to the **rear** portion of the frame as part of the remedy for the identified condition.
- (2) A Customer Satisfaction Program to address the potential for greater than expected levels of corrosion to the **front** portion of the frame in these vehicles.

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

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

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

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

As with the Tacoma LSC 90D, the Tundra B0D CRCs contain Volatile Organic Compounds (VOCs), Particulate Matter (PM) and other substances that are subject to federal, state and/or local laws related to **air emissions, fire code approval, waste generation and recordkeeping**. However, Noxudol 300 S contains lower VOCs than X128T and is a Class

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IIIB, instead of a Class II, combustible material. As a result, the Tundra B0D will pose different -- and generally less stringent -- compliance obligations under federal, state and/or local laws. Your dealership will be able to ***comply with these laws without significant burdens on your business*** as long as you follow the steps discussed in this Packet. Therefore, please review this entire Information Packet with your service and parts staff **BEFORE** you begin conducting the B0D.

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

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

IMPORTANT

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

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

If you are not able to use the Tacoma LSC 90D spray space for the Tundra B0D, then you will need to identify an appropriate spray space for the Tundra B0D and then you will need to contact your local fire code enforcement official for approval. If you are facing this situation, you also may wish to seek approval from your local fire code enforcement official to re-locate your LSC 90D spray space so that you can use the same space for both campaigns. Before proceeding, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss your particular situation.

**TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D
VERMONT 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 **Steps 5 and 6** below).

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

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

Go to the Site Selection Section for more information.

STEP 2 – BEFORE APPLYING THE TUNDRA B0D CRCs, CONFIRM THAT YOUR DEALERSHIP CAN CONDUCT B0D CONCURRENTLY WITH THE TACOMA LSC 90D WITHOUT TRIGGERING AIR PERMITTING REQUIREMENTS

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.

Toyota Motor Sales, U.S.A., Inc. has contacted the Vermont Department of Environmental Conservation, Division of Air Quality (VTDEC) and explained the Tundra B0D and its air

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emissions. Based on this information, VTDEC has issued a formal No Permit Determination. Under this Determination, Toyota's Vermont dealerships can conduct the Tundra B0D, concurrently with the Tacoma LSC 90D, and remain exempt from the requirement to obtain an air permit, PROVIDED THAT:

1. **B0D AND LSC 90D ARE CONDUCTED IN A MANNER THAT ASSURES VOC AND PM EMISSIONS FROM THESE PROCESSES WILL BE CONSISTENT WITH THE EMISSIONS LEVELS PRESENTED BY TMS TO VTDEC WHEN OBTAINING THE NO PERMIT DETERMINATION.**
 - a. To assure consistent emissions levels, **your dealership should NOT process a total or more than 1 Tacoma ever 1 hour and more than 1 Tundra every 2 hours.**
2. **ACTUAL EMISSIONS FROM ALL OPERATIONS AT YOUR DEALERSHIP COMBINED, NOT JUST THE B0D AND LSC 90D, STAY BELOW 5 TONS PER YEAR (TPY).**
 - a. Based on information provided to TMS at the time of the Tacoma LSC 90D launch, you should be able to conduct B0D in the same service bay as LSC 90D and stay below 5 tpy.
 - b. Your dealership can make its own choices about how best to stay below the 5 tpy level and remain exempt from permitting. To assist you, however, we have developed the following criteria: **Limit your total usage of coatings, paints, solvents, B0D and LSC 90D CRCs and any other VOC-containing materials to less than 1,600 gallons per year.**

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 1,600 gallon limit 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. For example, if your dealership's physical plant is distributed across multiple buildings, land parcels or physical locations, all materials used anywhere in those buildings and locations would be subject to the 1,600 gallon limit.*

If your dealership has an offside 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. **YOUR DEALERSHIP KEEPS RECORDS THAT DOCUMENT COMPLIANCE WITH #1 AND #2 ABOVE. (See Step 5 below).**

How Can I Learn More? Please see the **Air Regulations Section** of the Guide to Federal, State and Local Requirements for a full discussion of air permitting requirements and the **Air Recordkeeping Section** of the Guide to Federal, State and Local Requirements for tools that your dealership can use to assure compliance.

STEP 3 – BEFORE YOU BEGIN APPLYING THE TUNDRA B0D CRCS, (1) CONTACT THE APPROPRIATE FIRE CODE ENFORCEMENT OFFICIAL TO NOTIFY HIM/HER OF YOUR INTENTION TO CONDUCT 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 materials. State and local fire codes apply to the use of combustible materials. Building and zoning codes also may apply.

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

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

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

YOU MUST SEND THESE MATERIALS BEFORE CONDUCTING THE TUNDRA B0D.

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

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

STEP 4 – COMPLETE THE B0D READINESS SURVEY

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

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

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

- *The detailed **Technical Instructions for the B0D Campaign**, and*
- *Step 5 (comply with No Permit Determination requirements and keep air permitting exemption records), and*
- *Step 6 (comply with hazardous waste requirements). You should also review the **Guide to Federal, State and Local Requirements** to better understand the legal requirements for Steps 1, 2, 3, and 4.*

STEP 5 – COMPLY WITH NO PERMIT DETERMINATION AND KEEP AIR PERMITTING EXEMPTION RECORDS

As discussed under Step 2 above, VTDEC has issued a No Permit Determination. Under this Determination, your dealership can conduct Tundra B0D, currently with in Tacoma LSC 90D, and remain exempt from air permitting requirements so long as you:

1. DO NOT PROCESS A TOTAL OR MORE THAN 1 TACOMA EVERY 1 HOUR AND MORE THAN 1 TUNDRA EVERY 2 HOURS
2. LIMIT YOUR TOTAL USAGE OF COATINGS, PAINTS, SOLVENTS, B0D AND LSC 90D CRCs AND ANY OTHER VOC-CONTAINING MATERIALS TO LESS THAN 1,600 GALLONS PER YEAR

VTDEC’s No Permit Determination also requires you to maintain certain records in your files. Go to the [Air Recordkeeping Section](#) of the [Guide to Federal, State and Local Requirements](#) for more information and necessary documentation.

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 are not “hazardous waste” when discarded. Therefore, the B0D will not generate hazardous waste and it should not impact your dealership’s waste generator status (e.g., whether you are a Small Quantity Generator or a Conditionally Exempt Small Quantity Generator of hazardous waste).

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

If, as we assume, you conduct the BOD 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 BOD, 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/BOD waste are managed as hazardous waste.

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HOW TO IMPLEMENT THE B0D

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

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

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

VTDEC has issued a formal No Permit Determination for Tundra B0D. Under this Determination, Toyota's Vermont dealerships can conduct the Tundra B0D, concurrently with the Tacoma LSC 90D, and remain exempt from the requirement to obtain an air permit PROVIDED you: (a) limit your processing of vehicles to no more than 1 Tacoma every 1 hour and no more than 1 Tundra every 2 hours; (b) limit actual VOC emissions across the entire dealership below 5 tons per year (tpy) by limiting use of VOC-containing materials in all operations combined to 1,600 gallons per year; AND (c) maintain proper records (see Step 5 below).

Step 3: 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 Fire, Building and Zoning Codes Section of this Packet for compliance and contact information.

Step 4: Complete the B0D Readiness Survey

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

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

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

Step 5: Operate consistent with VTDEC's No Permit Determination and keep Air Permitting Exemption records

To operate consistent with VTDEC's No Permit Determination, you should adhere to the limits identified in Step 2 above and use the forms in Air Recordkeeping Section of this Packet to document that you are exempt from air permitting and are complying with air regulations. (No longer use the forms provided in the Tacoma LSC 90D Dealer Package.)

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 BOD 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 BOD 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-BOD operations at your dealership. We assume that you already comply with other environmental, health and safety requirements that apply to your facility.

If you have any questions after reviewing this information or as you proceed, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347). Thank you for participating in the Tundra Corrosion-Resistant Compound Campaign BOD.

Thank you for your cooperation.
TOYOTA MOTOR SALES, U.S.A., INC.

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

VERMONT 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 state and local codes, such as, as one example, the local fire code, impose operational limitations on the Tundra B0D, including on the location where you may conduct it.

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

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

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

SITE SELECTION CONSIDERATIONS

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

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

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

Note: The information in this Packet is not intended to cover building, zoning, mechanical or other environmental or occupational health and safety laws and regulations that might apply to non-B0D operations at your dealership. We assume that you already have systems in place to comply with any other environmental, health and safety requirements that apply to your dealership.

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

- a) **Adequate ventilation** (whether natural or mechanical);
Consideration should be given to: (1) locations/stalls near bay doors, other natural ventilation and/or areas with approved mechanical ventilation, and (2) where possible, locations at the end of a row of service bays and not in the middle.
- b) **Be at least 20 feet from:** (1) open flames and/or spark-producing equipment and appliances; and (2) any drying, curing, and/or fusion apparatus;
- c) The B0D work area must be located away from pits or other below-ground areas;
- d) The B0D work area must have a **suitable lift** that allows clear access to the vehicle’s frame rails.
- e) The floor of the B0D work area must be covered by an approved, noncombustible, nonsparking, **fire retardant material**.
- f) **Fire extinguishers rated “B,” “AB,” or “ABC”** must be provided **within 30’** (even if the work area has an automatic fire protection system);¹
- g) **Compressed air;**
- h) **Eyewash stations;**
- i) **Drop lights appropriate for use during the spraying of combustible liquids;**

3) **Any other equipment, operational and/or building features required by applicable law** or indicated in the **Material Safety Data Sheets (MSDSs)** for the B0D materials.

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

To prevent the possible accumulation of combustible vapors, the partition enclosures depicted in the Technical Instructions should have sufficient open space (at least one foot) (12”) at the bottom of the partition to allow for ventilation. In certain spray spaces, such as an end bay space, it may be appropriate to use a partition enclosure with only three sides and to leave the fourth side open (against the end wall), thereby increasing ventilation in the work area.

¹ A fire extinguisher should be in the vicinity even if the B0D work area has an automatic fire protection system (e.g., sprinklers).

OTHER REQUIREMENTS TO CONSIDER

Other Legal Requirements

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

B0D Material Storage

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

* * * * *

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TO: VERMONT TOYOTA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D
VERMONT 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 for Tacoma LSC 90D, to apply two CRCs to the interior and exterior of the frame.

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

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

- Air Quality under Vermont Department of Environmental Conservation, Division of Air Quality (VTDEC) regulations; 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.

IMPORTANT – PLEASE READ

The **Getting Started Guide** in the Dealer Information Packet provides a step-by-step overview of how to conduct the B0D so that your dealership will comply with these kinds of legal requirements. After you have reviewed the **Getting Started Guide** to familiarize yourself with these requirements, you should review this **Guide to Federal, State and Local Requirements**, which provides a more detailed discussion of these requirements and contains information and forms that you will need to comply with them.

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

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

1. **“AIR REGULATIONS” SECTION**

- a. The Air Regulations Section provides a detailed review of federal and state laws that will regulate air emissions from the Tundra B0D at your dealership.
- b. TMS has obtained a formal No Permit Determination from VTDEC that Tundra B0D can be conducted concurrently with Tacoma LSC 90D without an air permit. This Determination is limited to Toyota’s Vermont dealerships. If you do not plan to conduct Tundra B0D at your dealership, but instead at another location, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347) for more information.

2. **“AIR RECORDKEEPING” SECTION**

- a. **The Air Recordkeeping Section contains the forms that your dealership will need to track air emissions (and usage of materials that result in air emissions) from the B0D. *These records are required by Vermont’s air regulations. They ensure that your dealership can conduct Tundra B0D consistent with VTDEC’s No Permit Determination and remain exempt from air permitting and other regulatory requirements. As explained in the Air Regulations Section, the state requires you to maintain compliance records for two (2) years beyond the date that you process the last Tundra under the B0D.***
- b. *Each form in the Air Recordkeeping Section is accompanied by a version with text boxes that provides detailed instructions on how to fill out the form. In cases where you will need to do a calculation to complete the form, the form provides all of the information needed to do so.*

c. **The Air Recordkeeping Section provides NEW FORMS you can use for both the B0D AND the LSC 90D.**

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

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

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

b. **IMPORTANT:** As explained at the Fire, Building, and Zoning Codes Section, prior to implementing the B0D, your dealership will need to contact your local fire code enforcement official in order to:

(1) Notify him/her that you plan to conduct the Tundra B0D in the same spray space as Tacoma LSC 90D.

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

4. **“HAZARDOUS WASTE MANAGEMENT” SECTION**

a. The Hazardous Waste Management Section reviews the requirements that apply 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 (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347) for assistance.

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

TOYOTA MOTOR SALES, U.S.A., INC.

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

VERMONT DEALER INFORMATION PACKET GUIDE TO FEDERAL, STATE AND LOCAL REQUIREMENTS

AIR REGULATIONS SECTION

I. AIR PERMITTING REQUIREMENTS: ARE YOU EXEMPT?

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

Important: Air Emission Limits Apply To Your Entire Dealership. The 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.

Toyota Motor Sales, U.S.A., Inc. has contacted the Vermont Department of Environmental Conservation, Division of Air Quality (VTDEC) and explained the Tundra B0D and its air emissions. Based on this information, VTDEC has issued a formal No Permit Determination. Under this Determination, Toyota's Vermont dealerships can conduct the Tundra B0D, concurrently with the Tacoma LSC 90D, and remain exempt from the requirement to obtain an air permit, provided you adhere to certain limits and maintain proper records. Your dealership can make its own choices about how best to conduct the B0D and stay exempt from air permitting. However, your dealership should be able to conduct the B0D and stay exempt from air permitting laws ***if*** you satisfy A, B ***and*** C below.

YOUR DEALERSHIP SHOULD NOT NEED AN AIR PERMIT IF:

A. Your dealership does NOT have an onsite or an offsite body shop.

Why Does It Matter If I Have A Body Shop? *The state requires air emissions from your entire dealership to be combined to determine whether your dealership has air emissions below air permitting levels. Because a body shop will have higher air emissions than a regular vehicle service area, you can not be certain -- without further analysis -- that your dealership will remain exempt from air permitting after adding the B0D to its operations.*

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

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

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

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

C. Your dealership will operate in a manner consistent with VTDEC's No Permit Determination as follows:

- 1. Do NOT process a total or more than 1 Tacoma every 1 hour and more than 1 Tundra every 2 hours.**
- 2. Limit your total usage of coatings, paints, solvents, B0D and LSC 90D CRCs and any other VOC-containing materials to less than 1,600 gallons per year.**

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 1,600 gallon limit 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. For example, if your dealership's physical plant is distributed across multiple buildings, land parcels or physical locations, all materials used anywhere in those buildings and locations would be subject to the 1,600 gallon limit.*

VTDEC's No Permit Determination also requires you to maintain certain records in your files. Go to the [Air Recordkeeping Section](#) of the [Guide to Federal, State and Local Requirements](#) for more information and necessary documentation.

Why do I have to keep the records? *Because they are required by Vermont's air regulations, and support VTDEC's determination that the B0D operations at your dealership are exempt from air permitting. Please see the [Air Recordkeeping Section](#) for more information.*

II. AIR REGULATORY REQUIREMENTS: YOU WILL NOT REQUIRE A PERMIT OR A PERMIT MODIFICATION

A. Requirements to Qualify As Exempt from Air Permitting

- a. Generally, new air emission sources in Vermont, even minor sources, are required to obtain an air permit prior to their construction, unless the VTDEC determines that an air permit is not required.
- b. TMS has obtained a formal No Permit Determination from the VTDEC confirming that no permit is required for your dealership to conduct the Tundra B0D. A copy of this Permit Determination has been included in the Air Recordkeeping Section of this Guide.
- c. In obtaining this No Permit Determination, TMS provided emissions calculations to VTDEC for Tundra B0D as well as Tacoma LSC 90D. You must conduct B0D and LSC 90D in a manner that assures VOC and PM emissions from these processes will be consistent with these emissions calculations. To do so, **your dealership should NOT process a total or more than 1 Tacoma every 1 hour and more than 1 Tundra every 2 hours.**
- d. VTDEC's No Permit Determination for Tundra B0D presumes that your dealership does not have already have an air permit. Consistent with this presumption, your dealership must limit actual emissions of VOCs below 5 tons per year (tpy). Otherwise, you will be subject to additional regulatory requirements, including an obligation to file a air permit registration form with VTDEC.

- 1) Based on information that you provided to TMS at the time of the Tacoma LSC 90D launch, you should be able to add Tundra B0D to your operations and stay below this 5 tpy limit.
- 2) Your dealership can make its own choices about how best to continue to stay below the 5 tpy level and remain exempt from permitting. To assist you, however, we have developed the following criteria: **Limit your total usage of coatings, paints, solvents, B0D and LSC 90D CRCs and any other VOC-containing materials to less than 1,600 gallons per year.**
- 3) The 1,600 gallon limit 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. For example, if your dealership's physical plant is distributed across multiple buildings, land parcels or physical locations, all materials used anywhere in those buildings and locations would be subject to the 1,600 gallon limit.
- 4) If you exceed this limit or need more information, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347).

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

- e. 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 must maintain certain records to demonstrate that you are exempt from air permitting. **You must keep those records at your dealership for two (2) years beyond the date that you service the last Tundra under the B0D.**

A. VOC Emissions Records

1. Your dealership must maintain VOC emissions records to demonstrate that its actual VOC emissions fall below the 5 tpy air permitting exemption level. As noted above, you can keep your emissions below this level by tracking and limiting total usage of coatings, paints, solvents, B0D and LSC 90D CRC materials, and any other VOC containing materials (excluding gasoline and oil) to less than 1,600 gallons per year.

2. In the Air Recordkeeping Section of this Guide, you will find a “**Materials Usage Log – Annual VOC Emissions at Dealership**”, along with detailed instructions for completing the log. This log is designed as your tool for tracking usage on a monthly and annual basis, and then it will serve as your VOC air permitting exemption compliance record.
3. In the Air Recordkeeping Section of this Guide, you also will find a “**B0D and LSC 90D Production Log**” along with detailed instructions. This log is a tool for calculating actual VOC emissions from the B0D and LSC based on the number of Tundra and Tacoma vehicles that you process on a daily basis. This B0D and LSC 90D Production Log will serve as an additional VOC air permitting exemption compliance record; it also has other recordkeeping purposes discussed below.

B. PM Emissions Records

1. 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 and LSC 90D and whether those emissions are consistent with the information presented by TMS to VTDEC when obtaining the No Permit Determination. It is prudent, therefore, to maintain a record of actual PM emissions from the B0D and LSC 90D that will demonstrate your dealership have limited its processing to no more than 1 Tacoma every 1 hour and to no more than 1 Tundra every 2 hours.
2. You can use the “**B0D and LSC 90D Production Log**” in the Air Recordkeeping Section for this purpose. This log is a tool for calculating actual PM emissions from the B0D and LSC 90D based on the number of Tundras and Tacomas you process on a daily basis.

C. Other Records

You records also must include copies of:

- a. The B0D spray gun (Vaupel HSDR 3300) manufacturer’s specifications; and
- b. The Material Safety Data Sheets for the B0D Materials.

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

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TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

VERMONT 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 two (2) years after the date that you spray the last Tundra under the B0D.

Your dealership must maintain the documents and records listed below to comply with the record retention and availability requirements found in Vermont regulations, which requires the owner or operator of an exempt air contaminant source or device to maintain the following records for two (2) years:

1. Total B0D and LSC 90D Production Records (use attached "**Vermont B0D and LSC 90D Production Log**");
2. Dealership Material Usage (use attached "**Materials Usage Log**");
3. B0D Process Overview;
4. Spray Equipment Manufacturer's Specifications;
5. Material Safety Data Sheets (MSDSs) for the B0D materials (NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements); and
6. Letter from VTDEC, dated August 1, 2011, confirming that B0D operations at Toyota's Vermont dealerships are not required to obtain a permit.

Notes:

- I. To fill out the "Vermont B0D and LSC 90D Production Log," you can also use the Emissions Estimator that follows the chart.
- II. You do not need to do anything with items (3) through (6) above. You should simply keep those documents in your files. You will only need to provide them if requested by a government agency.
- III. You must keep these records for two (2) years. A failure to do so could subject you to penalties and fines. Since the B0D has no end date, you should keep the records for two years after the date you treat the last Tundra under the B0D.
- IV. A customer satisfaction portion of the B0D will end on December 31, 2012, which will alter per-truck emissions. At that time, you will be provided a new set of Technical Instructions and new forms for tracking emissions.

Instructions for Completing the Vermont B0D and LSC 90D Production Log

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

Step 1:
Enter "Reporting Year"
and "Dealership Name."

Step 2:
Enter the date and the
number of trucks that
you serviced with B0D
and LSC materials on
that date.

Step 3:
Enter the time that you
completed each of the
trucks treated. To comply
with the hourly PM
emissions limit, no Tundra
should be completed within
two hours of any other truck
(Tundra or Tacoma) and no
Tacoma should be
completed within one hour
of any other truck.

Step 4:
Use Table 1 to fill out the
rest of the log. To use
Table 1, find the number
of trucks that you serviced
with B0D materials across
the top and with LSC 90D
materials down the left
side, and then use the
emissions values listed for
each compound to fill out
the remaining portions of
the log.

Reporting Year: _____ Dealership Name: _____

Date	B0D		LSC 90D		Emissions	
	Number of Tundras	Time of Completion	Number of Tacomas	Time of Completion	Use the Emissions Estimator to determine the amount of emissions for each compound below.	
					VOC	PM
6-1-11	1	11:30	0	--	0.11	0.10
6-2-11	2	10:35, 2:45	1	12:00	3.08	0.27
6-3-11	0	--	1	11:45	2.86	0.07
6-4-11	1	12:00	1	2:35	2.97	0.17
6-5-11	2	11:10, 2:20	0	--	0.22	0.20
6-6-11	0	--	2	10:00, 11:15	5.72	0.14
6-7-11	1	4:00	2	10:05, 12:00	5.83	0.24
6-8-11	1	1:00	3	10:05, 2:15, 4:45	8.69	0.31
6-9-11	0	--	2	10:20, 12:00	5.72	0.14
6-10-11	3	10:35, 1:50, 5:00	0	--	0.33	0.30

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

		B0D Number of TUNDRAS Processed				
		0	1	2	3	4
LSC 90D Number of TACOMAS Processed	0	VOC = 0 PM = 0	VOC = 0.11 PM = 0.10	VOC = 0.22 PM = 0.20	VOC = 0.33 PM = 0.30	VOC = 0.44 PM = 0.40
	1	VOC = 2.86 PM = 0.07	VOC = 2.97 PM = 0.17	VOC = 3.08 PM = 0.27	VOC = 3.19 PM = 0.37	VOC = 3.30 PM = 0.47
	2	VOC = 5.72 PM = 0.14	VOC = 5.83 PM = 0.24	VOC = 5.94 PM = 0.34	VOC = 6.05 PM = 0.44	VOC = 6.16 PM = 0.54
	3	VOC = 8.58 PM = 0.21	VOC = 8.69 PM = 0.31	VOC = 8.80 PM = 0.41	VOC = 8.91 PM = 0.51	VOC = 9.02 PM = 0.61
	4	VOC = 11.44 PM = 0.28	VOC = 11.55 PM = 0.38	VOC = 11.66 PM = 0.48	VOC = 11.77 PM = 0.58	VOC = 11.88 PM = 0.68
	5	VOC = 14.30 PM = 0.35	VOC = 14.41 PM = 0.45	VOC = 14.52 PM = 0.55	VOC = 14.63 PM = 0.65	VOC = 14.74 PM = 0.75
	6	VOC = 17.16 PM = 0.42	VOC = 17.27 PM = 0.52	VOC = 17.38 PM = 0.62	VOC = 17.49 PM = 0.72	VOC = 17.60 PM = 0.82

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Vermont B0D and LSC 90D Emissions Estimator

Dealers should use this document to estimate the amount of emissions resulting from the B0D and the LSC 90D. These estimates are needed to complete the tables in the Vermont B0D and LSC 90D Production Log.

Instructions for using this document

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

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

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

		B0D Number of TUNDRAS Processed				
		0	1	2	3	4
<u>LSC 90D</u> Number of <u>TACOMAS</u> Processed	0	VOC = 0 PM = 0	VOC = 0.11 PM = 0.10	VOC = 0.22 PM = 0.20	VOC = 0.33 PM = 0.30	VOC = 0.44 PM = 0.40
	1	VOC = 2.86 PM = 0.07	VOC = 2.97 PM = 0.17	VOC = 3.08 PM = 0.27	VOC = 3.19 PM = 0.37	VOC = 3.30 PM = 0.47
	2	VOC = 5.72 PM = 0.14	VOC = 5.83 PM = 0.24	VOC = 5.94 PM = 0.34	VOC = 6.05 PM = 0.44	VOC = 6.16 PM = 0.54
	3	VOC = 8.58 PM = 0.21	VOC = 8.69 PM = 0.31	VOC = 8.80 PM = 0.41	VOC = 8.91 PM = 0.51	VOC = 9.02 PM = 0.61
	4	VOC = 11.44 PM = 0.28	VOC = 11.55 PM = 0.38	VOC = 11.66 PM = 0.48	VOC = 11.77 PM = 0.58	VOC = 11.88 PM = 0.68
	5	VOC = 14.30 PM = 0.35	VOC = 14.41 PM = 0.45	VOC = 14.52 PM = 0.55	VOC = 14.63 PM = 0.65	VOC = 14.74 PM = 0.75
	6	VOC = 17.16 PM = 0.42	VOC = 17.27 PM = 0.52	VOC = 17.38 PM = 0.62	VOC = 17.49 PM = 0.72	VOC = 17.60 PM = 0.82

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Instructions for Completing Materials Usage Log

Follow these four steps to complete the **VOC-Containing Materials Usage Log** (see sample log below):

Step 1:

Keep copies of receipts for all VOC-containing materials purchased by your dealership.

Step 2:

On a monthly basis, enter the total quantity (in gallons) of **Noxudol 300 S, X128T** and **712AM** BOD and LSC material purchased by your dealership in Column 1.

Step 3:

On a monthly basis, enter the total quantity (in gallons) of **all other** VOC-containing paints, coatings, solvents, and materials purchased by your entire dealership in Column 2.

Total VOC-Containing Materials, Paintings, Coatings and Solvents			
	Column 1 Enter total quantity of BOD and LSC 90D materials (gal). Each 4 liter BOD kit = 1.06 gal; each 5 liter LSC 90D kit = 1.33 gal.	Column 2 Enter total quantity of all other VOC-containing materials (gal).	Column 3 Add Column 1 to Column 2, and enter the results below (gal).
January	20	50	70
February	40	42	82
March	32	65	97
April	28	65	93
May	55	20	75
June	50	45	95
July	45	45	90
August	40	52	92
September	35	35	70
October	40	35	75
November	42	20	62
December	50	35	85
			986 (Enter sum of Column 3)

Step 4:

Add amounts in Columns 1 and 2 and enter the total each month in Column 3.

Step 5:

At the end of the year, sum all your purchases of VOC-containing materials in gallons (see Column 3). **If the sum for the year is greater than 1,600 gallons, please contact the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.**

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Materials Usage Log – Annual VOC Emissions at Entire Dealership

Reporting Year: _____ Dealership name and location: _____

Instructions: This dealership uses this log to demonstrate that actual annual volatile organic compound (VOC) emissions from all sources are **BELOW 5 TONS (10,000 LBS) PER YEAR**. To meet this limit, this dealership does not use:

- **More than 1,600 gallons per year combined of B0D and LSC 90D materials, paints, solvents, coatings, and any other materials that you know contains VOCs (1,600 gallons per year = an average of 133 gallons per month)**

If the dealership's annual emissions exceed either of these limits, please promptly call the EH&S Hotline (877-572-4347) for assistance.

B0D and LSC 90D Materials, Paintings, Coatings and Solvents		
<u>Column 1</u> Enter total quantity of B0D and LSC 90D materials (gal). Each 4 liter B0D kit = 1.06 gal; each 5 liter LSC 90D kit = 1.33 gal.	<u>Column 2</u> Enter total quantity of all other VOC-containing materials (gal).	<u>Column 3</u> Add Column 1 and Column 2, and enter the results below (gal).
January		
February		
March		
April		
May		
June		
July		
August		
September		
October		
November		
December		

(Enter total from Column 3)

Duplicate as Necessary

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OPERATING INSTRUCTIONS

CAVITY PRESSURE CONTAINER GUN 3300 HS DR

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

Use as intended

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

For your safety

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

Device Characteristics

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

Safety instructions

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

Start up

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

Working instructions / Application

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

When finished working

- Blow the cavity spray tube clear with air; for this, depress the trigger to the first step.
- Remove cavity spray tube; disconnect the device from the air supply.

- Release pressure from the gun; for this purpose, turn the pressure container to the left until air escapes.
- Store the device and its accessories out of reach of children.
- Store the gun only upright if material remains in the pressure tank.

Cleaning

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

Attention

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

Faults

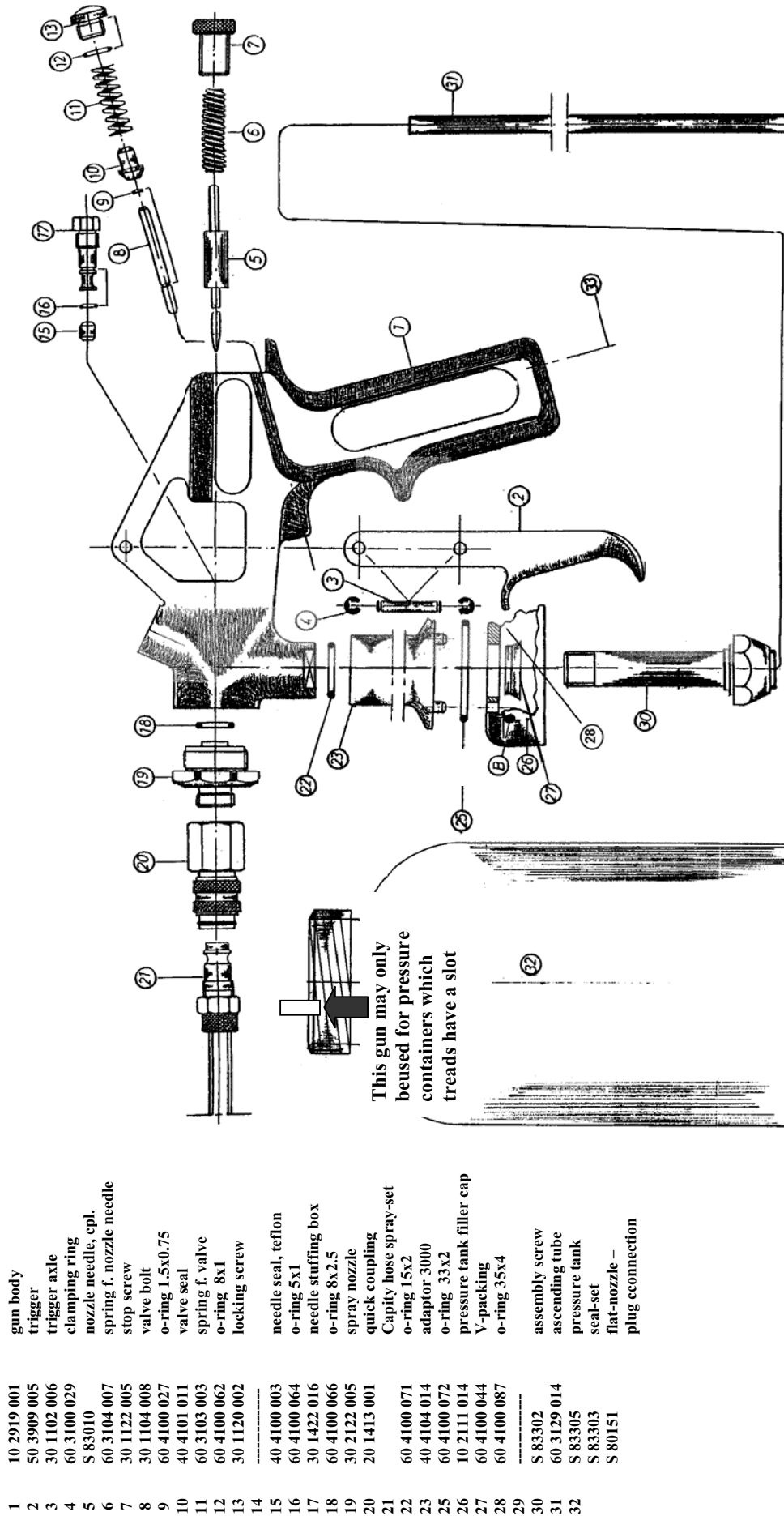
- Valve bolt (8) is stuck or does not close:
Put oil on the valve bolt or into the air intake port of the gun. Depress the trigger (2) several times.
- Gun does not spray properly:
Spray nozzle (19), ascending tube (31), cavity spray tube round spray or angle nozzle or gun (1) partly clogged.
Remove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

Environmental Protection

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

Druckbehälterpistole pressure container gun

3300 HSDR



- 1 10 2919 001 gun body
- 2 50 3909 005 trigger
- 3 30 1102 006 trigger axle
- 4 60 3100 029 clamping ring
- 5 S 83010 nozzle needle, cpl.
- 6 60 3104 007 spring f. nozzle needle
- 7 30 1122 005 stop screw
- 8 30 1104 008 valve bolt
- 9 60 4100 027 o-ring 1.5x0.75
- 10 40 4101 011 valve seal
- 11 60 3103 003 spring f. valve
- 12 60 4100 062 o-ring 8x1
- 13 30 1120 002 locking screw
- 14 -----
- 15 40 4100 003 needle seal, teflon
- 16 60 4100 064 o-ring 5x1
- 17 30 1422 016 needle stuffing box
- 18 60 4100 066 o-ring 8x2.5
- 19 30 2122 005 spray nozzle
- 20 20 1413 001 quick coupling
- 21 Capity hose spray-set
- 22 o-ring 1.5x2
- 23 60 4100 071 adaptor 3000
- 24 60 4104 014 o-ring 33x2
- 25 60 4100 072 pressure tank filler cap
- 26 10 2111 014 V-packing
- 27 60 4100 044 o-ring 3.5x4
- 28 -----
- 29 S 83302 assembly screw
- 30 60 3129 014 ascending tube
- 31 S 83305 pressure tank
- 32 S 83303 seal-set
- S 80151 flat-nozzle - plug connection

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	B

Date of Review:
Date of Preparation: November 14, 2007

Revised: March 17, 2011
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 CAS #64742-42-3	5-10	ACGIH TLV: 2 mg/m ³ OSHA PEL: 2 mg/m ³
Petroleum distillates, solvent dewaxed heavy paraffinic CAS #64742-65-0	5-15	ACGIH TLV: 5 mg/m ³ OSHA PEL: 5 mg/m ³
Sulfonic acids, petroleum, Calcium salts, overbased CAS #68783-96-0	5-15	ACGIH TLV: 5 mg/m ³ (oil mist) OSHA PEL: 5 mg/m ³ (oil mist)
White mineral oil, petroleum CAS #8042-47-5	50-60	ACGIH TLV: 5 mg/m ³ (oil mist) OSHA PEL: 5 mg/m ³ (oil mist)
Bentonite, quaternary ammonium compound modified CAS# 68953-58-2	0.3-1.0	Not established

Soybean oil polymer with isophthalic acid and pentaerythritol CAS# 66071-86-1	0.4-4	Not established
Castor oil, dehydrated, polymerized CAS# 68038-02-8	5-15	Not established
Calcium Carbonate CAS #471-34-1	5-10	OSHA PEL: 5 mg/m ³ (respirable fraction) OSHA PEL: 15 mg/m ³ (total dust) ACGIH TLV: 10 mg/m ³ (^[2] nuisance dust)

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

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

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

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

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

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

Products of Combustion: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.

SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Steps to be taken in case Material is Released or Spilled: Shut off ignition sources; no flares, smoking or flames in hazard area. Stop leak if you can do it without risk.

Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.

Large Spills: Dike far ahead of liquid spill for later disposal.

SECTION 7: SAFE HANDLING INFORMATION

Precautions To Be Taken In Handling/Storage: Store in cool, well-ventilated area. Keep away from flames. Never use a torch to cut or weld on or near container.

Other Precautions: Never wear contaminated clothing. Launder or dry clean before wearing. Discard oil-soaked shoes. Wash thoroughly with soap and water (waterless hand cleaner may be helpful in removing residues) after use and before smoking or eating. Avoid excessive skin contact.

SECTION 8: EXPOSURE CONTROLS

Respiratory Protection: NIOSH-approved respirator for organic vapor and mist to control exposure where ventilation is inadequate.

Ventilation: General and local exhaust.

Personal Protective Equipment: Protective Gloves: Impervious gloves (Viton, PVOH, etc.) Eye Protection: Safety glasses with sideshields or chemical goggles. Other Protective Clothing or Equipment: If splashing is anticipated, wear rubber apron and boots or other protective equipment to minimize contact.

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

Hazardous Decomposition Products: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

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

SECTION 11: DISPOSAL CONSIDERATIONS

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

SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)

VOC per gallon: 0.165 lbs/gal

EPA Hazardous Waste Number(s) (40CFR Part 261):

D001

EPA Hazard Category (40CFR Part 370):

DELAYED (CHRONIC)

SARA TITLE III

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

CHEMICAL	CAS NO.	WT %
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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
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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
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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 %
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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.



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S
Product Codes: None
Product Use: Vehicle Underbody Coating

Synonyms: None
Chemical Name: Anti Rust Compound

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

US Distributor: Soken Trade Corporation
12055 Sherman Way
North Hollywood, CA
USA
www.noxudolusa.com
(800) 598-3535
(818) 308-8427

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

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

PREPARED BY: MSDS Authoring Services
VERSION: 1

ISSUE DATE: March 1, 2011
SUPERSEDES DATE: None

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

<u>Chemical Name</u>	<u>Amount % by Wt.</u>	<u>CAS Number</u>	<u>OSHA PEL (ppm)</u>	<u>ACGIH STEL (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 filler/pigment	<2%	1317-65-3	15 for total dust; 5 for respirable fraction	10 for total dust; 3 for respirable fraction
Carbon black	1%	1333-86-4	3.5	3.5
Crystalline silica	<0.1%	14808-60-87	10/(%SiO ₂ +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.



3. HAZARDS IDENTIFICATION

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

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

CARCINOGENICITY:

OSHA: Not listed

ACGIH: Not listed

NTP: Not listed

IARC: Not listed

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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

**5. FIRE AND EXPLOSION HAZARD DATA**

FLAMMABLE PROPERTIES: Not flammable. Combustible.

AUTO IGNITION TEMPERATURE (ASTM E659):

HOT-FLAME AUTOIGNITION TEMPERATURE (AIT):

MINIMUM IGNITION TEMPERATURE: 750°F

IGNITION DELAY: 12 Seconds

BAROMETRIC PRESSURE, TORR: 766

COOL-FLAME AUTOIGNITION TEMPERATURE (CFT):

MINIMUM IGNITION TEMPERATURE: 745°F

IGNITION DELAY: 120 Seconds

BAROMETRIC PRESSURE, TORR: 766

REACTION THRESHOLD TEMPERATURE FOR PRE-FLAME (RTT):

MINIMUM REACTION TEMPERATURE: 740°F

LIMITS OF FLAMMABILITY IN GENERAL ACCORDANCE WITH ASTM E-681 AT 200°C

LOWER FLAMMABLE LIMIT (LFL): 1.81 %

UPPER FLAMMABLE LIMIT (UFL): See Note

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

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE



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

SHELF LIFE: See label on packaging.

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

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

CAS NO.	CHEMICAL NAME
64741-88-4	Solvent-refined heavy paraffinic distillate mg/m ³
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/M ³
OSHA PEL-TWA:	NONE
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/M ³
OSHA PEL-TWA:	NONE
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/M ³
OSHA PEL-TWA:	NONE
OSHA PEL STEL:	NONE
OSHA PEL CEILING:	NONE
ACGIH TLV-TWA:	2 (FUME)
ACGIH TLV STEL:	NONE
ACGIH TLV CEILING:	NONE

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



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

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.



9. PHYSICAL/CHEMICAL CHARACTERISTICS

FORM: Highly viscous liquid

COLOR: Black

ODOR: Slight mineral oil like odor

BOILING POINT: >390°F (>200°C)

SOLUBILITY IN WATER: Not soluble in water

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

EVAPORATION RATE: (BuAc=1): Not applicable

POUR POINT (ASTM) D97): +30

AUTOIGNITION TEMPERATURE: >750°F 399°C)

FLASH POINT: 285°F (140°C) ASTM D93

pH: Not available

PERCENT SOLIDS BY WEIGHT: 98.9%

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

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

COLD FREEZE POINT (ASTM D97): +25

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

VAPOR PRESSURE By Isoteniscope (ASTM D2879), torr:

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

10. STABILITY AND REACTIVITY

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

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

POLYMERIZATION: Not available.

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

DECOMPOSITION: Not available.

11. TOXICOLOGICAL INFORMATION

EFFECTS OF EXPOSURE

ACUTE INHALATION: LC50 not available

EYES: Irritant

SKIN: Irritant

ACUTE INGESTION: LD50 not available



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

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

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

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

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

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



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.

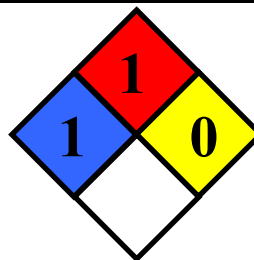
INTERNATIONAL REGULATIONS:

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	

National Fire Protection Association (NFPA):**NFPA Ratings:** Health: 1, Flammability: 1, Reactivity: 0

NFPA/HMIS Definitions: 0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme

Protective Equipment: Goggles & shield; lab coat & apron; vent hood; proper gloves; class b extinguisher.

Prepared By: Donato Polignone (MSDS Authoring Services)

Part Number: --

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Supersedes Date: March 1, 2011

ADDITIONAL INFORMATION:

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

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

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

END OF MSDS

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State of Vermont
Department of Environmental Conservation
Air Pollution Control Division
103 South Main Street/Bldg 3 South
Waterbury, VT 05671-0402
(802) 241-3840
FAX (802) 241-2590

AGENCY OF NATURAL RESOURCES

August 1, 2011

Peter Van Oot
Downs Rachlin Martin PLLC
8 South Park Street
PO Box 191
Lebanon, NH 03766-0191

RE: Toyota Tundra Corrosion Campaign

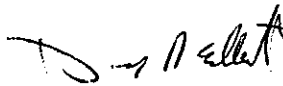
Dear Mr. Van Oot:

The Vermont Agency of Natural Resources (ANR) Department of Environmental Conservation (DEC) Air Pollution Control Division (APCD) is in receipt of your letter dated July 26, 2011 regarding the proposed corrosion resistant compound program for Toyota Tundra trucks. This program is very similar to the ongoing program for Toyota Tacoma trucks which was previously determined not to require a permit from the APCD. The coatings to be used for the Tundra campaign actually have significantly reduced VOC content and contain no other compounds of regulatory concern.

The Agency has determined that no permit is required for the dealerships that wish to participate and therefore Toyota is free to proceed with this campaign as proposed at their convenience.

If you have any questions or comments, please feel free to contact me by phone at (802) 241-3845, by email at doug.elliott@state.vt.us, or in writing at the above address.

Sincerely,



Douglas R. Elliott, Chief
Permitting and Engineering Services Section
Air Pollution Control Division

A2 Toyota Dealerships



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

FIRE, BUILDING, AND ZONING CODES SECTION**

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

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

WHERE WILL YOU CONDUCT THE B0D?

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

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

BEFORE you begin applying B0D materials, you must do BOTH of the following:

- 1. Notify the appropriate fire code enforcement official, in writing, of your intent to conduct the Tundra B0D in the same space now being used for the Tacoma LSC 90D**

In Appendix A you will find a model letter and attachments that you can use to notify your fire code enforcement official. You will need to add some descriptive information confirming that the space where you will conduct the Tundra B0D is the same now being used for Tacoma LSC 90D.

These materials include a Determination of Compliance with the applicable fire codes prepared by Commercial Construction Consulting, Inc. (“C3”) for TMS. To identify your appropriate fire code enforcement official, see Table 1 of this Section (starting at page 63).

IMPORTANT – PLEASE READ

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

2. **Confirm that you can conduct the B0D in compliance with applicable fire code, building, and zoning requirements.**

Locate your city/town/county on Table 1 (starting at page 63) to see whether it has any additional building, zoning, or other requirements applicable to the B0D and contact your local officials as indicated.

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

I. SUMMARY OF APPLICABLE STATE REQUIREMENTS

A. Fire Code²

1. The B0D does not require a state fire permit under the Vermont Fire & Building Safety Code (Fire Code) and Appendix A contains a Determination of Compliance that the B0D complies with the Fire Code (or locally adopted fire codes, as appropriate) so long as you conduct the B0D in the same location where you are conducting the Tacoma LSC 90D and you continue to follow the procedures outlined in this Fire, Building & Zoning Code Section and the Site Selection Section of the Dealer Packet. The Fire Code does require you to inform the appropriate fire code enforcement official (which may be the State Fire Marshal's office) before commencing B0D operations at your dealership. See Table 1 (starting at pg. 63) for your dealership's requirements and appropriate fire code enforcement official.

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

IMPORTANT! – FIRE CODE INFORMATION

You must continue to comply with items 2 and 3 below, and any additional requirements contained in Table 1 (starting at p. 63) or placed on your dealership as part of the approvals received for the Tacoma LSC 90D as part of your implementation of the B0D. **If you cannot meet all the requirements identified in items 2 or 3, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347) for additional assistance.**

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

Compliance Note: During the period when dealers are offering both Tacoma LSC 90D and the Tundra B0D, dealers will also need to remain in compliance with the additional requirements placed on the Tacoma LSC 90D by the Vermont Division of Fire Safety in 2009, due to the LSC's use of a Class II combustible liquid (X-128T).

Specifically, for LSC 90D the requires: (1) Dealers may not to move vehicles into or out of the work bay adjoining the bay where the spray operation is in process; and (2) vehicles in adjoining bays must be moved into the bay prior to the time of spray application so that any hot surfaces are reduced below the auto-ignition temperature of the material being sprayed. Additionally, the Division required dealers to maintain

² Vermont has adopted the National Fire Protection Association's Uniform Fire Code – NFPA 1 (2006 ed.) which references Standard for Spray Application Using Flammable or Combustible Material - NFPA 33 both of which have specific provisions governing spraying operations like the B0D.

signage in the LSC work area stating the following: "Spraying in Progress – No Sparks – No Ignition "ON" – No Flames – No Smoking".

Therefore, as a practical matter, during the period of LSC/B0D overlap, vehicles may not be driven into or out of an adjoining bay while spray operations are in process. If vehicles must be moved into or out of the bays adjacent to the LSC/B0D work area while spraying is ongoing, they must be moved manually (no ignition on).

The above described signage was enclosed with the LSC 90D materials and, during the LSC/B0D overlap period, should remain affixed to a partition in a manner that is visible to workers in adjacent bays or stalls to remind them of these requirements. **Please go to the Site Selection Section of this Guide to ensure that your LSC/B0D work area is setup properly.**

- 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**
- e. That the materials applied to the truck bed include only Class IIIB liquids and not include any organic peroxide catalyst³ (Note: Each of the B0D's Corrosion-Resistant Compounds that you are being provided – interior and exterior - satisfies this requirement); **and**
- f. Fire extinguishers be provided in the vicinity⁴ of the B0D operation (Note: fire extinguishers must be rated "B", "AB", or "ABC").

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

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

³ Among other requirements, in order to conduct the B0D consistent with the Vermont State Fire & Building Safety Code, the materials sprayed must meet at least one (1) of the following criteria: (1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids; (2) Not contain any solvent or component that has a flash point below 37.8°C (100°F); or (3) Consist only of Class IIIB liquids and not include any organic peroxide catalyst. The B0D was designed to only use Class IIIB liquids without organic peroxide catalysts.

⁴ See the Site Selection Section in this Dealer Information Packet for specific distancing requirements for fire extinguishers in the vicinity of the spraying area.

3. Both B0D materials are considered Class IIIB combustible liquids and the amount of materials that you will use during the B0D should not trigger any new combustible liquid storage requirements for your dealership. However, as a best management practice, please store consistently with the guidelines below:
 - a. **DO NOT store more than 25 gallons of the B0D 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.

(Go to Next Page for Building Code Discussion)

B. Building Code⁵

1. The B0D should not require a building permit under the Vermont State Fire & Building Safety 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 63.⁶

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

Regulatory Note: *(i) Regulatory Note – Regarding Act 250 Permits: If your dealership operates pursuant to an Act 250 Permit, you must determine whether that permit prohibits processes like the B0D or whether the B0D would constitute a “material change” because, if so, then you may need a permit amendment. We have reviewed the Act 250 requirements and do not expect that the B0D will require a permit amendment. However, if you have any questions or need additional information, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347).*

II. SUMMARY OF APPLICABLE LOCAL REQUIREMENTS

Table 1 below identifies the local requirements applicable to the B0D (if any). It is organized by the city/local jurisdiction where your dealership is located. **IF THE LOCALITY WHERE YOU PLAN TO CONDUCT THE B0D IS NOT LISTED IN TABLE 1 (STARTING AT PAGE 63), PLEASE GO TO THE C.L.E.A.N. DEALER WEBSITE ([HTTP://CLEANDEALER.COM](http://cleandealer.com)) OR**

⁵ Vermont has adopted the following codes: International Building Code (2006 ed.); the Fire/Life Safety Code (NFPA 101 (2006 ed.) and the National Electric Code (NFPA 70, 2008 ed.) . Vermont’s building code, replaces references to the International Mechanical Code with the Uniform Fire Code (NFPA 1, 2006).

⁶ In particular, the application of the CRCs 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.

CALL THE EH&S HOTLINE (877-572-4347). The sections below briefly review these requirements.

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

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

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

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Table 1: Code Summary for Vermont Locations

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Vermont (State)		
Bellows Falls	See <i>Westminster, VT below</i> .	Based on our information, the Bellows Falls' Dealership is located outside city limits and is located in Westminster, VT. See Westminster, VT below for your local requirements information.
Carbone Toyota of Bennington	<p>Kevin J. Goodhue, Firm Marshal Code Enforcement Officer Building and Zoning Office 205 South Street, Bennington, VT 05201 (802) 442-1040</p> <p>NFPA Jurisdiction - Materials to contact your appropriate fire code enforcement official are found in Appendix A.</p>	<p>You may not store waste generated by B0D operations outdoors for greater than 30 days unless you have received a temporary zoning permit by from the Administrative Officer.</p> <p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: Daniel W. Monks Building and Zoning Office 205 South Street, Bennington, VT 05201 (802) 442-1040</p>
Courtesy Toyota-Berlin	<p>Michael Desrochers, Division of Fire Safety Barre Regional Office 1311 US Route 302 - Berlin Suite 500 Barre, VT 05641 (802) 479-7572</p> <p>NFPA Jurisdiction - Materials to contact your appropriate fire code enforcement official are found in Appendix A.</p>	<p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: Jeff Schulz Zoning Administrator, Town of Berlin 108 Shed Road Berlin, VT 05602 (802) 229-9298 zoning@berlinvt.org</p>

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
<p>White River Toyota-Hartford</p>	<p>Michael Bedard, Fire Marshal Fire Prevention Division Hartford Fire Department 812 VA Cutoff Rd. White River Jct. VT 05001 (802) 295-3232</p> <p>NFPA Jurisdiction - Materials to contact your appropriate fire code enforcement official are found in Appendix A.</p>	<p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: Jo-Ann Ells Zoning Administrator Department of Planning and Development Service 171 Bridge Street WRJ, VT 05001 802-295-3075 jells@hartford-vt.org</p>
<p>Alderman's Toyota-Rutland</p>	<p>L. D. Butch Sutherland Regional Manager Division of Fire Safety Rutland Regional Office 56 Howe Street Building A, Suite 200 Rutland, VT 05701 (802) 786-0073</p> <p>NFPA Jurisdiction - Materials to contact your appropriate fire code enforcement official are found in Appendix A.</p>	<p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: James P. Simonds - Building Inspector / Zoning Administrator Building & Zoning Department City of Rutland 52 Washington St. Second Floor P.O. Box 969 Rutland, VT 05702 (802) 773-1800</p>
<p>Heritage Toyota-South Burlington</p>	<p>Robert Patterson Regional Manager Division of Fire Safety Williston Regional Office 372 Hurricane Lane, Suite 102 Williston, VT 05495 (802) 879-2302</p> <p>NFPA Jurisdiction - Materials to contact your appropriate fire code enforcement official are found in Appendix A.</p>	<p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: Paul Conner, AICP South Burlington Planning and Zoning 575 Dorset Street South Burlington, VT 05403 (802)846-4106</p>

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
<p>Handy Toyota-St. Albans</p>	<p>Josh Cox Fire Marshal City of Saint Albans Fire Department 30 Lower Welden Street St. Albans, VT 05478 802.524.2132 office 802.393.3307 cell j.cox@stalbanstv.com</p> <p>Robert Patterson Regional Manager Division of Fire Safety Williston Regional Office 372 Hurricane Lane, Suite 102 Williston, VT 05495 (802) 879-2302</p> <p>NFPA Jurisdiction - Materials to contact your appropriate fire code enforcement official are found in Appendix A.</p>	<p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: James Tischler, AICP Planning Director P. O. Box 37 St. Albans, VT 05481 802-524-1500</p>
<p>Durand Toyota Ford-Westminster</p>	<p>Bruce Martin Division of Fire Safety Springfield Regional Office 100 Mineral Street, Suite 307 Springfield, VT 05156 (802) 885-8967</p> <p>NFPA Jurisdiction - Materials to contact appropriate fire code enforcement official are found in Appendix A</p>	<p>You should confirm that the location where you are going to conduct the B0D is not located in a wellhead protection area; otherwise certain automobile repair operations may be prohibited.</p> <p>You should confirm that the location where you are going to conduct the B0D is not located in a 100 Year Flood Zone. If so, additional requirements might apply (e.g., a Conditional Use Permit).</p> <p>You should verify that the B0D will not constitute a change in use or impermissible use under your dealership's zoning permit or other land use approvals, if applicable.</p> <p>Contact: William Jewell Zoning Administrator Town of Westminster 3651 US RT 5 P.O. Box 147 Westminster, VT 05158 802-722-4524 westmzoning@comcast.net</p>

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
White River Junction		The Village of White River Junction (WRJ) is located within the City of Hartford, VT. See Hartford VT above for your local requirements information.

APPENDIX A

Materials to Demonstrate Compliance with the Vermont State and Local Fire Code Requirements: NFPA Jurisdictions

Compliance Information

&

Materials to submit to the Appropriate Fire Code Enforcement Official

- **Model Letter**
- **B0D Operation Description**
- **C3 Determination of B0D Compliance with Vermont
State Fire & Building Safety Code Fire Code, NFPA
1**
- **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: Vermont NFPA Jurisdictions- Summary of Fire Code Requirements

Your local jurisdiction is subject to the Vermont State Fire & Building Safety Code (which adopts the 2006 edition of the NFPA 1 and 2003 edition of NFPA 33).

- **Before you begin conducting the B0D, you will need to provide your local fire code enforcement official with information about the B0D and your intent to conduct the B0D in the same space where you are/were conducting the Tacoma LSC 90D.** Under the Vermont State Fire & Building Safety Code and locally adopted fire codes, the appropriate fire code enforcement official has the authority to require plans and specifications to ensure compliance with applicable codes and standards, and may require an operating permit for B0D 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 and B0D Process Description (and MSDSs) from Commercial Construction Consulting Inc. (“C3”), a professional consulting firm retained by Toyota to assess the B0D’s compliance with the NFPA 1 and NFPA 33, as adopted by the Vermont State Fire & Building Safety Code, (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 B0D operation will take place. (*Note: Electronic copies of these materials can be found on the C.L.E.A.N. Dealer website - <http://cleandealer.com>*).
- **You should do the following:**
 - 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 63.)
 - Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
 - Service area where the B0D 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 B0D materials; and
 - Ventilation system in the area where the B0D will be conducted.
 - **Remember - Enclose the following with the cover letter to the appropriate fire code enforcement official:**
 - The **Determination of Compliance letter prepared by C³**;
 - The **completed dealership information sheet** from Appendix A2.

- **Copies of the Material Safety Data Sheets (MSDSs)** for the 712AM and Noxudol 300S materials (provided in the Air Recordkeeping Section of this Guide and on the C.L.E.A.N. Dealer website - <http://cleandealer.com>).
- Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.

**APPENDIX A2: Model Letter for Vermont
State Fire & Building Safety Code Jurisdictions and
B0D Process Information to be included with Letter**

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

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[DEALER LETTERHEAD]

[Insert Appropriate Local Fire Code Enforcement Official Contact Information from Table 1 on page 63]

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

Dear _____:

In November 2009, Toyota announced a safety recall for certain Model Year '00-'03 Tundras. In conjunction with the recall, Tundra Corrosion-Resistant Compound Campaign B0D (B0D) is being implemented to apply Corrosion-Resistant Compound (protective sealant) to Model Year 2000-2003 Tundra vehicles registered in certain cold climate states, including Vermont. Our dealership is taking part in this B0D. We are writing to provide you with information about the B0D process and to inform you that we intend to begin offering the program on [Insert Date 10 days from now], unless we hear from you otherwise.

Our dealership previously obtained your office's approval to conduct a Limited Service Campaign (LSC) 90D for Tacoma vehicles at our facility located at [insert address]. We contacted you earlier this year to inform you that we would be continuing to offer the Tacoma LSC 90D at our dealership through the end of 2011. In that letter we indicated that Toyota had announced its intention to offer a separate Corrosion-Resistant Compound Campaign to owners of certain model year Tundra vehicles. This B0D is the Tundra campaign that we were referring to and we will be conducting the B0D Tundra campaign in the same approved location where we are currently conducting the Tacoma LSC 90D.

The B0D will involve the spray application of two Class IIIB combustible liquids to the frames of certain model year Tundra trucks. Note, the Tacoma LSC 90D involves the spraying of a Class II combustible liquid; however, Toyota has transitioned to a less volatile, Class IIIB combustible liquid for its future undercoating campaigns, including the B0D. The attached documents explain the B0D process, provide a description of the method for applying those materials, confirmation of the location in our vehicle service area where the B0D will take place, and include MSDSs for the materials that will be used. We believe this information demonstrates that the B0D will be conducted in accordance with all applicable laws, regulations, and other codes and is acceptable to your office, as it complies with your previous approval of undercoating operations at our dealership.

For your information, we have attached the following to this letter: (1) a description of the B0D process, materials and equipment; (2) a Determination of Compliance finding that the B0D as designed conforms to NFPA 1 and (3) site-specific information confirming the location where we will conduct the B0D is the same location you have already approved for undercoating operations.

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.

Best regards,

Attachments:

- C³ Determination of Compliance, with description of BOD Process and BOD Material MSDSs
- Dealership information sheet

**ATTACHMENT 1: DETERMINATION OF COMPLIANCE AND DESCRIPTION OF THE BOD
PROCESS FROM COMMERCIAL CONSTRUCTION CONSULTING, INC.**

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July 29, 2011

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

**Re: Toyota Corrosion-Resistant Compound Application Program
Compliance with the Vermont Fire & Building Safety Code**

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

We understand that the CRC Program is substantially similar to the Limited Service Campaign 90D (“LSC 90D”) approved by the Vermont Division of Fire Safety in 2009, 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 Class IIIB material, but will substitute a less combustible, Class IIIB liquid for the Class II liquid. Thus, the new CRC Program uses only Class IIIB materials. We further understand that the LSC 90D (which uses the Class II material) will expire and no longer be offered to Toyota customers in Vermont after December 31, 2011.

The Vermont State Fire Code, adopted under 20 V.S.A. Chapter 173, Subchapter 2 “Fire Safety Division”, Subchapter 3 “Fire Hazards and Dangerous Substances”, Subchapter 5 “Boilers and Pressure Vessels” and Chapter 177 “Explosives and Fireworks”, is known as the Vermont Fire & Building Safety Code - 2006. The Vermont State Fire Code adopts NFPA 1, Uniform Fire Code™ (2006) and the Standard for Spray Application Using Flammable or Combustible Materials, NFPA 33 (2003). NFPA 33 (2003), which governed the LSC 90D program, is also applicable to the CRC Program and is the standard used in this analysis.

As discussed below, we have determined that the CRC Program will be in compliance with the applicable provisions of NFPA 33 (2003). We have further determined that as long as the CRC Program is conducted in the same spray area previously approved for the LSC 90D, in accordance with operational requirements of the Code’s referenced vehicle undercoating exemption, then the CRC Program continues to qualify for the exemption in NFPA 33 paragraph 12.1.1 and further approval should not be required. We would additionally note that, while the LSC program is still being conducted in Vermont (through December 2011), dealers will also need to remain in compliance with the additional requirements that were placed on the LSC 90D by the Vermont Division of Fire Safety in 2009 due to the use of the Class II material for the LSC 90D.¹

Regulatory Analysis

NFPA-33

NFPA 33, Section 12.1 notes that vehicle spray undercoating operations conducted in an area with adequate ventilation are exempt from the provisions of NFPA-33 if certain requirements are met:

¹ Pursuant to emails from Assistant State Fire Marshal Robert Howe in September 2009, Dealers conducting the LSC 90D will maintain signage to be posted at the LSC 90D work area, stating the following: “Spraying in Progress – No Sparks – No Ignition “ON” – No Flames – No Smoking”. Further, dealers will not move vehicles into or out of the work bay adjoining the bay where the spray operation is in process and a vehicle in the adjoining bay must be moved into the bay prior to the time of spray application so that any hot surfaces are reduced below the auto-ignition temperature of the material being sprayed.



Regulation: *Section 12.1 (Automobile Undercoating and Body Lining):*

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

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

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

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

12.1.1.4: The coating or lining materials used shall meet one of the following criteria:

- (1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids*
- (2) Not contain any solvent or component that has a flash point below 100°F (37.8°C)*
- (3) Consist only of Class IIIB liquids and not include any organic peroxide catalyst*

Analysis: The CRC Program meets the requirements in paragraph 12.1.1 and therefore qualifies for the undercoating exemption in NFPA-33: 1) Both materials to be used are Class IIIB; 2) We recommend that dealers 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 Code’s vehicle undercoating exemption.

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

If a dealer chooses to conduct the CRC Program in a different service bay from the one previously approved, then the operations at the new bay must comply with the requirements for an exemption under NFPA-33 Section 12.1. We recommend 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

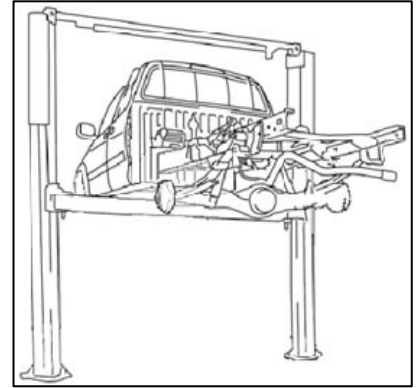
TUNDRA B0D PROCESS OVERVIEW

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

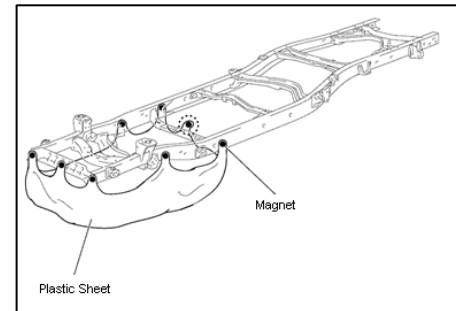
Step 2: Vehicle Preparation. Dealers will employ the following procedures to prepare their service areas and vehicles for spraying.

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

Tundra on Lift with Bed Removed



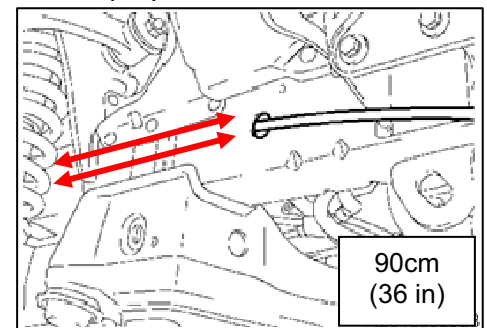
Attachment of Plastic Sheet to Capture any 712AM Drips



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

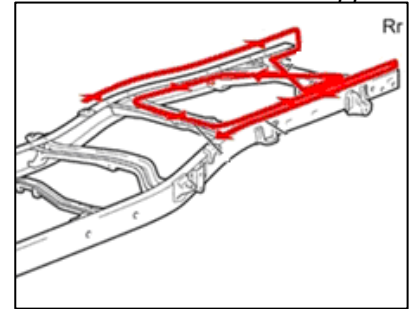
- Apply 712AM. Set up Vaupel spray gun and insert 360° spray nozzle a specified distance into selected holes in the frame. Press spray gun trigger and pull out nozzle at fixed speed while spraying interior surface of frame with one liter of 712AM. When finished, insert rubber plugs and foam blocks to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

360° Spray Wand Inserted into Frame



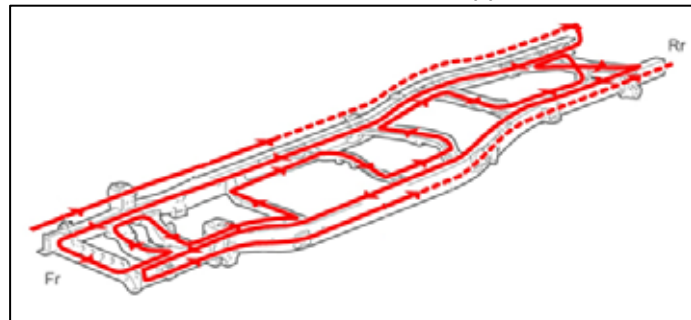
- Remove plastic sheet suspended from frame.
- Lower lift. Lower the lift until the top of the rear portion of the frame is approximately 4'6" above the floor.
- Apply Noxudol 300 S to top external surface of rear portion of frame.
Set up Vaupel spray gun and locate unidirectional handheld spray nozzle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

*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 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*



- 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

Noxudol 300 S

Last Updated April 18, 2011

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Noxudol 300 S
Product Codes: None
Product Use: Vehicle Underbody Coating

Synonyms: None
Chemical Name: Anti Rust Compound

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

US Distributor: Soken Trade Corporation
12055 Sherman Way
North Hollywood, CA
USA
www.noxudolusa.com
(800) 598-3535
(818) 308-8427

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

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

PREPARED BY: MSDS Authoring Services
VERSION: 1

ISSUE DATE: March 1, 2011
SUPERSEDES DATE: None

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

<u>Chemical Name</u>	<u>Amount % by Wt.</u>	<u>CAS Number</u>	<u>OSHA PEL (ppm)</u>	<u>ACGIH STEL (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 filler/pigment	<2%	1317-65-3	15 for total dust; 5 for respirable fraction	10 for total dust; 3 for respirable fraction
Carbon black	1%	1333-86-4	3.5	3.5
Crystalline silica	<0.1%	14808-60-87	10/(%SiO ₂ +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.



3. HAZARDS IDENTIFICATION

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

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

CARCINOGENICITY:

OSHA: Not listed

ACGIH: Not listed

NTP: Not listed

IARC: Not listed

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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

**5. FIRE AND EXPLOSION HAZARD DATA**

FLAMMABLE PROPERTIES: Not flammable. Combustible.

AUTO IGNITION TEMPERATURE (ASTM E659):

HOT-FLAME AUTOIGNITION TEMPERATURE (AIT):

MINIMUM IGNITION TEMPERATURE: 750°F

IGNITION DELAY: 12 Seconds

BAROMETRIC PRESSURE, TORR: 766

COOL-FLAME AUTOIGNITION TEMPERATURE (CFT):

MINIMUM IGNITION TEMPERATURE: 745°F

IGNITION DELAY: 120 Seconds

BAROMETRIC PRESSURE, TORR: 766

REACTION THRESHOLD TEMPERATURE FOR PRE-FLAME (RTT):

MINIMUM REACTION TEMPERATURE: 740°F

LIMITS OF FLAMMABILITY IN GENERAL ACCORDANCE WITH ASTM E-681 AT 200°C

LOWER FLAMMABLE LIMIT (LFL): 1.81 %

UPPER FLAMMABLE LIMIT (UFL): See Note

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

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE



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

SHELF LIFE: See label on packaging.

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

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

CAS NO.	CHEMICAL NAME
64741-88-4	Solvent-refined heavy paraffinic distillate mg/m ³
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/M ³
OSHA PEL-TWA:	NONE
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/M ³
OSHA PEL-TWA:	NONE
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/M ³
OSHA PEL-TWA:	NONE
OSHA PEL STEL:	NONE
OSHA PEL CEILING:	NONE
ACGIH TLV-TWA:	2 (FUME)
ACGIH TLV STEL:	NONE
ACGIH TLV CEILING:	NONE

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



9. PHYSICAL/CHEMICAL CHARACTERISTICS

FORM: Highly viscous liquid

COLOR: Black

ODOR: Slight mineral oil like odor

BOILING POINT: >390°F (>200°C)

SOLUBILITY IN WATER: Not soluble in water

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

EVAPORATION RATE: (BuAc=1): Not applicable

POUR POINT (ASTM) D97): +30

AUTOIGNITION TEMPERATURE: >750°F 399°C)

FLASH POINT: 285°F (140°C) ASTM D93

pH: Not available

PERCENT SOLIDS BY WEIGHT: 98.9%

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

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

COLD FREEZE POINT (ASTM D97): +25

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

VAPOR PRESSURE By Isoteniscope (ASTM D2879), torr:

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

10. STABILITY AND REACTIVITY

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

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

POLYMERIZATION: Not available.

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

DECOMPOSITION: Not available.

11. TOXICOLOGICAL INFORMATION

EFFECTS OF EXPOSURE

ACUTE INHALATION: LC50 not available

EYES: Irritant

SKIN: Irritant

ACUTE INGESTION: LD50 not available



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

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

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

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

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

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



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.

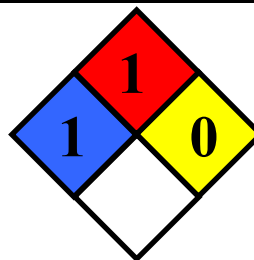
INTERNATIONAL REGULATIONS:

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	

National Fire Protection Association (NFPA):**NFPA Ratings:** Health: 1, Flammability: 1, Reactivity: 0

NFPA/HMIS Definitions: 0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme

Protective Equipment: Goggles & shield; lab coat & apron; vent hood; proper gloves; class b extinguisher.

Prepared By: Donato Polignone (MSDS Authoring Services)

Part Number: --

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Supersedes Date: March 1, 2011

ADDITIONAL INFORMATION:

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

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

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

END OF MSDS

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	B

Date of Review:
Date of Preparation: November 14, 2007

Revised: March 17, 2011
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 CAS #64742-42-3	5-10	ACGIH TLV: 2 mg/m ³ OSHA PEL: 2 mg/m ³
Petroleum distillates, solvent dewaxed heavy paraffinic CAS #64742-65-0	5-15	ACGIH TLV: 5 mg/m ³ OSHA PEL: 5 mg/m ³
Sulfonic acids, petroleum, Calcium salts, overbased CAS #68783-96-0	5-15	ACGIH TLV: 5 mg/m ³ (oil mist) OSHA PEL: 5 mg/m ³ (oil mist)
White mineral oil, petroleum CAS #8042-47-5	50-60	ACGIH TLV: 5 mg/m ³ (oil mist) OSHA PEL: 5 mg/m ³ (oil mist)
Bentonite, quaternary ammonium compound modified CAS# 68953-58-2	0.3-1.0	Not established

Soybean oil polymer with isophthalic acid and pentaerythritol CAS# 66071-86-1	0.4-4	Not established
Castor oil, dehydrated, polymerized CAS# 68038-02-8	5-15	Not established
Calcium Carbonate CAS #471-34-1	5-10	OSHA PEL: 5 mg/m ³ (respirable fraction) OSHA PEL: 15 mg/m ³ (total dust) ACGIH TLV: 10 mg/m ³ (^[2] nuisance dust)

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

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

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

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

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

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

Products of Combustion: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.

SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Steps to be taken in case Material is Released or Spilled: Shut off ignition sources; no flares, smoking or flames in hazard area. Stop leak if you can do it without risk.

Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.

Large Spills: Dike far ahead of liquid spill for later disposal.

SECTION 7: SAFE HANDLING INFORMATION

Precautions To Be Taken In Handling/Storage: Store in cool, well-ventilated area. Keep away from flames. Never use a torch to cut or weld on or near container.

Other Precautions: Never wear contaminated clothing. Launder or dry clean before wearing. Discard oil-soaked shoes. Wash thoroughly with soap and water (waterless hand cleaner may be helpful in removing residues) after use and before smoking or eating. Avoid excessive skin contact.

SECTION 8: EXPOSURE CONTROLS

Respiratory Protection: NIOSH-approved respirator for organic vapor and mist to control exposure where ventilation is inadequate.

Ventilation: General and local exhaust.

Personal Protective Equipment: Protective Gloves: Impervious gloves (Viton, PVOH, etc.) Eye Protection: Safety glasses with sideshields or chemical goggles. Other Protective Clothing or Equipment: If splashing is anticipated, wear rubber apron and boots or other protective equipment to minimize contact.

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

Hazardous Decomposition Products: Carbon monoxide, carbon dioxide, oxides of sulfur, miscellaneous hydrocarbons.

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

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

SECTION 11: DISPOSAL CONSIDERATIONS

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

SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)

VOC per gallon: 0.165 lbs/gal

EPA Hazardous Waste Number(s) (40CFR Part 261):

D001

EPA Hazard Category (40CFR Part 370):

DELAYED (CHRONIC)

SARA TITLE III

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

CHEMICAL	CAS NO.	WT %
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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
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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
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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 %
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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.

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ATTACHMENT 2: DESCRIPTION OF LOCATION WHERE THE B0D WILL TAKE PLACE AT [INSERT NAME OF DEALERSHIP]

- We will conduct the B0D 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 B0D will be conducted.

- We will store B0D materials in accordance with applicable codes governing the storage of combustible liquids.

Insert a description of the storage area to be used for B0D materials.

- We will ensure that the B0D is conducted in an area that has adequate ventilation.

Insert a description of the method of ventilation in the vehicle service area where the B0D will be conducted.

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TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

VERMONT DEALER INFORMATION PACKET

HAZARDOUS WASTE MANAGEMENT

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

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

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

Regulatory Note Regarding EPA ID Number: *Prior to beginning the LSC 90D, your dealership should have obtained an EPA Hazardous Waste ID Number if it did not already have one. Although the B0D should not generate any hazardous waste, as discussed above, if you conduct the B0D in the same spray space as the LSC 90D you will need to manage any 90D-only or B0D-90D combined waste from the common B0D-LSC 90D spray space as hazardous waste, which requires an EPA Hazardous Waste ID Number. The EPA ID Number requirement applies to each location at your dealership with a separate mailing address. If you do not have an EPA Hazardous Waste ID Number for the building where the B0D and LSC 90D will be conducted, the LSC 90D Dealer Information Packet explains how to obtain one.*

Regulatory Note Regarding BOD Tarps and Partitions: *If, as we assume, the LSC 90D and BOD are conducted in a common spray space, the tarps/partitions used should be managed like other hazardous waste when you dispose of them. The weight of these tarps counts against the monthly hazardous waste management limits noted in Section 3 below. Given their size and weight, the tarps/partitions could represent a large quantity of waste if disposed of frequently and could impact your compliance with the limits noted below. Therefore, we recommend that you reuse the tarps and other materials used to create the partitions described in the **Technical Instructions**.*

1. **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. **FOR ALL OTHER DEALERSHIPS, IF YOU GENERATE HAZARDOUS WASTE, YOU MUST HAVE NOTIFIED THE VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION AND HAVE AN EPA IDENTIFICATION NUMBER (EPA ID NUMBER). THE EPA ID NUMBER REQUIREMENT DOES NOT APPLY ACROSS YOUR ENTIRE DEALERSHIP, BUT TO EACH LOCATION AT YOUR DEALERSHIP WITH A SEPARATE MAILING ADDRESS.**
3. **IF YOU ARE NOT A SMALL QUANTITY GENERATOR, DO NOT GENERATE MORE THAN 220 POUNDS OF HAZARDOUS WASTE PER MONTH, OR ACCUMULATE MORE THAN 2,200 POUNDS OF HAZARDOUS WASTE AT ANY TIME, THE BOD WILL NOT IMPACT YOUR GENERATOR STATUS.**

- a. Your dealership will not have to become a registered SQG (and thereby be subject to additional requirements) if you stay below the two registered SQG triggers:
 - (1) Generate no more than 220 pounds of hazardous waste in a calendar month; and
 - (2) Accumulate no more than 2,200 pounds of hazardous waste at any one time.

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

4. **STORE ALL HAZARDOUS WASTES IN PROPER CONTAINERS WITH PROPER LABELS, AND MAINTAIN REQUIRED RECORDS.**
5. **DISPOSE OF ALL HAZARDOUS WASTE ONLY AT FACILITIES AUTHORIZED TO RECEIVE "HAZARDOUS" WASTE USING A COMPANY LICENSED TO TRANSPORT SUCH WASTE TO THE DISPOSAL FACILITY.**
6. **REMEMBER TO COUNT USED OIL AGAINST YOUR MONTHLY HAZARDOUS WASTE LIMIT IF YOU DETERMINE IT TO BE HAZARDOUS.**

- a. **In Vermont, 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 (Note: Used oil containing more than 1,000 ppm of total halogens is presumed to be a hazardous waste, though this presumption can be rebutted.)
- 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.