TO: DELAWARE 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
DELAWARE DEALER INFORMATION PACKET

This bound volume contains two parts of the Delaware Dealer Information Packet for the Tundra Corrosion-Resistant Compound (CRC) Campaign B0D—the Getting Started Guide and the Guide to Federal, State and Local Requirements. The third part—the Technical Instructions—is bound separately.

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TO: DELAWARE DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS  
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RE: Information Packet for Tundra Corrosion-Resistant Compound Campaign B0D

TUNDRA CORROSION-RESISTANT COMPOUND CAMPAIGN B0D

DELAWARE 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 the laws relating to air permitting 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 spray gun 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 spray gun to apply the Noxudol 300 S for the Tundra B0D.

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

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

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

**IMPORTANT**

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

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

If you are not able to use the Tacoma LSC 90D spray space for the Tundra B0D, then you will need to identify an appropriate spray space for the Tundra B0D and then you will need to contact your local fire code enforcement official for approval. **If you are facing this situation, you also may wish to seek approval from your local fire code enforcement official to re-locate your LSC 90D spray space so that you can use the same space for both campaigns.** Before proceeding, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss your particular situation.
Where Will You Conduct The B0D? This Getting Started Guide assumes that you will conduct the Tundra B0D in the same spray space currently being used to conduct the Tacoma LSC 90D. If you are unable to do so, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347), for assistance.

PLEASE READ THIS GETTING STARTED GUIDE CAREFULLY so that you understand the steps your dealership should take to comply with the applicable legal requirements:

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

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

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

**STEP 2 – BEFORE APPLYING THE TUNDRA B0D CRCs, CONFIRM THAT YOUR DEALERSHIP CAN CONDUCT THE TUNDRA B0D IN COMPLIANCE WITH REGISTRATION REQUIREMENTS**

The B0D CRC materials contain Volatile Organic Compounds (VOCs), Particulate Matter (PM) and other substances subject to federal, state and local 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 applicable government agency.
Your dealership is currently conducting the Tacoma LSC 90D under an air permit issued by the Delaware Department of Natural Resources and Environmental Control (DNREC). Toyota Motor Sales, U.S.A., Inc. (TMS) has contacted DNREC and explained the Tundra B0D and its air emissions. Based on this information, DNREC has determined that your dealership can conduct the Tundra B0D – separate and apart from the Tacoma LSC 90D – by means of a self-registration process, rather than applying for a new permit or modifying your dealership’s existing Tacoma LSC 90D permit. TMS has submitted the self-registration application on your behalf, and DNREC has confirmed that the B0D campaign may commence upon its receipt of this application. TMS will be separately mailing you a copy of the individual self-registration application filed on your behalf, along with a letter from DNREC acknowledging receipt of the application. As explained in the Air Recordkeeping Section of the Guide to Federal, State and Local Requirements, you should retain your application and the DNREC letter along with your other B0D compliance records.

Your dealership will be able to comply with the registration for the Tundra B0D so long as your dealership:

1. Conducts the B0D in a manner consistent with the VOC and PM emissions levels presented by TMS to DNREC in the registration application. To ensure consistent emissions levels, your dealership should NOT process a total of more than one Tundra vehicle every 2 hours. In addition, your dealership should not process more than one Tacoma vehicle every 1 hour to ensure compliance with your existing Tacoma LSC 90D permit.

2. Keeps aggregate actual VOC and PM emissions for the Tundra B0D process below 10 pounds per day. As long as you limit your vehicle processing per #1 above, your daily emissions from B0D will be well below this 10 pound-per-day level.

3. Maintains the necessary records to document compliance with #1 and #2 above. You can use the forms in the Air Recordkeeping Section of this Packet for this purpose. (No longer use the forms provided in the Tacoma LSC 90D Dealer Package.)
IMPORTANT COMPLIANCE REMINDER:

Both your existing Tacoma LSC 90D air permit and your Tundra B0D registration assume that your dealership:

1. Does NOT have a large onsite or offsite body shop;
2. Conducts the B0D in an existing service area (which will be the case if you are using the current LSC 90D spray space); AND
3. Does not currently engage in other significant spraying, coating, painting or other activities similar to the B0D (other than the LSC 90D) that involve applying VOC-containing materials with spray guns.

**Do I Have To Consider My Entire Dealership’s Operations Or Only Operations At The Place Where I Will Conduct The Tundra B0D?** The criteria 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 of those buildings and locations would be subject to the requirements above.

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

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

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

The B0D CRCs are Class IIIB combustible liquids. State and local fire codes apply to the use of combustible materials. Building and zoning codes also may apply.
Your dealership can make its own choices about how best to comply with these codes. To assist you, however, we have prepared a detailed review of these requirements for your reference, which can be found in the Fire, Building and Zoning Codes Section of the Federal, State and Local Requirements Guide. You should be able to satisfy these requirements as long as you:

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

*What Do I Need To Give My Local Fire Code Enforcement Official?* 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 (keep air regulatory compliance 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 – KEEP AIR REGULATORY COMPLIANCE RECORDS**

You must maintain records in your dealership’s files showing that you are conducting the B0D consistent with the VOC and PM emissions levels presented by TMS to DNREC in the self-registration application (discussed in Step 2 above) and are complying with air regulations, including your LSC 90D air permit. Such records should include documentation that you do NOT process a total of more than one Tundra vehicle every 2 hours and more than one Tacoma vehicle every 1 hour.

You must also keep training records for all employees participating in the Tundra B0D.

The Air Recordkeeping Section of the Guide to Federal, State and Local Requirements has instructions and recordkeeping forms that your dealership can use to meet its recordkeeping obligations for B0D. It also includes a form for documenting your vehicle processing that you can use for LSC 90D as well.

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

If, as we assume, you conduct the B0D in the same work area as the LSC 90D, any discarded floor tarps, partitions or other items used to clean up the common work area (e.g., rags) may contain X128T and should, therefore, be managed as hazardous waste.

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However, any materials that are used ONLY in the B0D, such as the plastic sheet secured to the Tundra frame when applying 712AM, should not need to be managed as hazardous waste so long as they contain no X128T waste. You should develop a waste handling procedure suitable to your operation that will ensure LSC 90D waste and combined LSC 90D/B0D waste are managed as hazardous waste.
# HOW TO IMPLEMENT THE B0D

| Step 1: Confirm that your existing Tacoma LSC 90D spray space is an appropriate spray space for Tundra B0D. |
| Toyota is advising its dealers to **conduct the Tundra B0D in their existing Tacoma LSC 90D spray space.** If you cannot use this existing spray space for B0D, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347 to discuss your particular situation. |

| Step 2: Make sure you can conduct the Tundra B0D consistent with the air regulatory self-registration obtained by TMS for your dealership. |
| TMS has filed an application with DNREC for your dealership to obtain a self-registration under 7 DE Admin. Code 1100, § 2.1.1.1 to conduct Tundra B0D. You must conduct B0D in a manner consistent with the emissions levels presented by TMS to DNREC by not processing more than one Tundra every 2 hours. Consistent with the air permit received previously for the Tacoma LSC 90D, you should not process more than one Tacoma every 1 hour. You must also maintain proper records (see Step 5 below). **NOTE:** Both the B0D self-registration and the LSC 90D air permit assume that your dealership meets the following criteria: (1) does not have an onsite or offsite body shop; (2) will conduct the B0D in an existing service area; and (3) does not have other significant spraying, coating, painting or other activities similar to the B0D (other than the LSC 90D) that involve applying VOC-containing materials with spray guns. If you determine that your dealership does not meet the above criteria, then call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347. |

| Step 3: Notify Your Local Fire Official in Writing of Your Intention to Conduct This Campaign in the Same Spray Space Being Used for the Tacoma LSC 90D, and Confirm Your Compliance with Building and Zoning Code Requirements. |
| See Fire, Building and Zoning Codes Section of this Packet for compliance and contact information. |

| Step 4: Complete the B0D Readiness Survey. |
| Please complete the **B0D Readiness Survey** available at the C.L.E.A.N. Dealer website ([http://cleandealer.com](http://cleandealer.com)) to confirm your readiness to start the B0D. Toyota will then automatically ship one additional Vaupel HSDR 3300 spray gun (for the Noxudol 300 S material) to you at no charge. |

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

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

| Step 5: Keep Air Regulatory Compliance Records. |
| You must adhere to the limits identified in Step 2 above (e.g., you should NOT process more than one Tundra every 2 hours and more than one Tacoma every 1 hour) and use the forms in the Air Recordkeeping Section of this Packet to document that you are complying with these limits and other air regulations. (No longer use the forms provided in the Tacoma LSC 90D Dealer Package.) You must also keep training records for all employees participating in the Tundra B0D. |

| Step 6: Comply with Hazardous Waste Requirements. |
| Unlike Tacoma LSC 90D, Tundra B0D will not generate hazardous waste. Therefore, items used exclusively for B0D – such as plastic sheeting suspended from the front portion of the frame while applying 712 AM – will not, when discarded, need to be managed as hazardous waste. However, the LSC 90D does generate hazardous waste, and therefore, items being used for both the LSC 90D and B0D – such as floor tarps and clean up rags – will need, when discarded, to be managed as hazardous waste. Please continue to follow the instructions provided in the LSC 90D Dealer Information Packet for managing hazardous waste. Also, you will need proper procedures in place for distinguishing between B0D-only and combined LSC 90D/B0D waste. |
The steps outlined above should help you ensure that your dealership conducts the B0D in compliance with the relevant federal, state and local legal requirements. You should use this Getting Started Guide along with the other parts of the B0D Dealer Information Packet – the Guide to Federal, State and Local Requirements and the Technical Instructions.

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

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

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

TOYOTA MOTOR SALES, U.S.A., INC.
Please carefully review the entire Dealer Information Packet – including this Site Selection Section – with your Service and Parts Staff.

Various state and local fire, building and zoning codes impose operational limitations on the Tundra B0D, including on the location where you may conduct it.

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

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

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

### SITE SELECTION CONSIDERATIONS

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

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

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

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

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

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

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

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

- **Air Emissions Regulations by the Delaware Department of Natural Resources and Environmental Control (DNREC);** 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&$ Hotline at (877) 572-4347 to discuss your particular situation.
The Getting Started Guide in the Dealer Information Packet provides a step-by-step overview of how to conduct the B0D so that your dealership will comply with these kinds of legal requirements. After you have reviewed the Getting Started Guide to familiarize yourself with these requirements, you should review this Guide to Federal, State and Local Requirements, which provides a more detailed discussion of these requirements and contains information and forms that you will need to comply with them.

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

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

1. “AIR REGULATIONS” SECTION

a. The Air Regulations Section provides a detailed review of federal and state laws that will regulate air emissions from the Tundra B0D at your dealership. In general, these laws allow air emissions up to a certain level and require a facility, if it wishes to exceed that level, to request permission from the state through an air permitting process.

b. For the Tacoma LSC 90D, your dealership received an air permit that limits your processing of Tacomas to no more than (i) one truck every 1 hour; (ii) 12 trucks per 24 hours; and (iii) 1,224 trucks for the entire LSC 90D.

c. Due to its lower air emissions, Tundra B0D does not require an air permit, but instead only a self-registration pursuant to 7 DE Admin. Code 1100, § 2.1.1.1. TMS has submitted the self-registration application on your behalf, and DNREC has confirmed that, with its receipt of this application, B0D may commence as long as conducted in a manner consistent with this application and the self-registration requirements. To do so, your dealership must:

(1) Conduct the B0D in a manner consistent with the VOC and PM emissions levels presented by TMS to DNREC in the registration application. To ensure consistent emissions levels, your dealership should NOT process a total of more than one Tundra vehicle every 2 hours. In addition, your dealership should not process more than one Tacoma vehicle every 1 hour to ensure compliance with your existing Tacoma LSC 90D air permit;

(2) Keep aggregate actual VOC and PM emissions from the Tundra B0D process below 10 pounds per day. As long as you limit your...
vehicle processing per #1 above, your daily emissions from B0D will be well below this 10 pound-per-day level; AND

(3) Maintain the necessary records to document compliance with #1 and #2 above. You can use the forms in the Air Recordkeeping Section of this Packet for this purpose. (No longer use the forms provided in the Tacoma LSC 90D Dealer Package for vehicle processing documentation.)

**IMPORTANT COMPLIANCE REMINDER:**

Both your existing Tacoma LSC 90D air permit and your Tundra B0D registration assume that your dealership:

1. Does NOT have a large onsite or offsite body shop;

2. Conducts the B0D in an existing service area (which will be the case if you are using the current LSC 90D spray space); AND

3. Does not currently engage in other significant spraying, coating, painting or other activities similar to the B0D (other than the LSC 90D) that involve applying VOC-containing materials with spray guns.

**Do I Have To Consider My Entire Dealership’s Operations Or Only Operations At The Place Where I Will Conduct The Tundra B0D?** The criteria 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 of those buildings and locations would be subject to the requirements above.

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

2. **“AIR RECORDKEEPING” SECTION**

   a. The Air Recordkeeping Section contains the forms that your dealership will need to track air emissions from the B0D and LSC 90D. These forms will help to make sure that your dealership can conduct the B0D in compliance with registration requirements. As explained in the Air Regulations Section, you should maintain compliance records for five (5) years beyond the date that you process the last Tundra under the B0D.

[Return to Table of Contents]
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 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 Tundra B0D in compliance with these codes.

b. IMPORTANT: As explained at the Fire, Building, and Zoning Codes Section, prior to implementing the B0D, you 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 this campaign. If you have any questions or concerns relating to discussions with your local fire code enforcement official, please call the EH&S Hotline (877-572-4347) for assistance.

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

4. “HAZARDOUS WASTE MANAGEMENT” SECTION

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

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

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

* * * * *

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

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

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

TOYOTA MOTOR SALES, U.S.A., INC.
I. REGISTRATION AND APPROVAL REQUIREMENTS: ARE YOU ELIGIBLE?

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.

Your dealership is currently conducting the Tacoma LSC 90 under air permits issued by the Delaware Department of Natural Resources and Environmental Control (DNREC). TMS has contacted DNREC and explained the Tundra B0D and its air emissions. Based on this information, DNREC has determined that your dealership can conduct the Tundra B0D – separate and apart from the Tacoma LSC 90D – by means of a self-registration process, rather than applying for a new permit or modifying your dealership’s existing permit. TMS has submitted the self-registration application on your behalf, and DNREC has confirmed that the B0D campaign may commence upon its receipt of this application. TMS will be separately mailing you a copy of the individual self-registration application filed on your behalf, along with a letter from DNREC acknowledging receipt of the application. As explained in the Air Recordkeeping Section of the Guide to Federal, State and Local Requirements, you should retain your application and the DNREC letter along with your other B0D compliance records.

Your dealership can make its own choices about how best to conduct the B0D and comply with the self-registration and other air regulatory requirements. However, your dealership should be able to conduct the B0D in compliance with these requirements, if you satisfy A, B, and C below.
A. Your dealership’s operations are consistent with the Tacoma LSC 90D air permit and Tundra B0D self-registration, which means that you:

1. **Do 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 eligible for registration 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) by registering with and obtaining approval from DNREC. 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 call the EH&S Hotline (877-572-4347) for assistance.*

2. **Will conduct the B0D in an existing service area; AND**

   **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) or in another state, then you may not be able to remain eligible for registration and approval, 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 call the EH&S Hotline (877-572-4347) for more information.

3. **Does not have other significant spraying, coating, painting or other activities similar to the B0D (other than the Tacoma LSC 90D) that involve applying VOC-containing materials with spray guns.**

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How Can I Learn More About How These Registration and Approval Requirements Will Apply To My Dealership? The discussion in Section II below provides further explanation of the registration and approval requirements. You should review it carefully to ensure that you understand the basis for these requirements and how they will apply to your dealership.

B. Your dealership conducts the B0D in a manner that ensures VOCs and PM emissions will be consistent with the emission levels presented to DNREC in your registration application and also conducts the LSC 90D consistent with your existing air permit:

TO ENSURE CONSISTENT EMISSIONS, YOUR DEALERSHIP SHOULD LIMITS ITS HOURLY PROCESSING OF:
1. TUNDRA TO NO MORE THAN ONE EVERY 2 HOURS; AND
2. TACOMA TO NO MORE THAN ONE EVERY 1 HOUR.

C. Your dealership keeps records of your compliance with air regulatory requirements by documenting daily processing of trucks under Tundra B0D and Tacoma LSC 90D (see the Air Recordkeeping Section of this Packet for forms you can use to do so).

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

1. Aggregate Emissions of Volatile Organic Compounds (VOCs) and Particulate Matter (PM)

   a. Registration:

      (1) TMS has contacted DNREC and explained the Tundra B0D and its air emissions. Based on this information, DNREC has determined that your dealership can conduct the Tundra B0D – separate and apart from the Tacoma LSC 90D – by means of a self-registration process, rather than applying for a new permit or modifying your dealership’s existing Tacoma LSC 90D permit. TMS has submitted the self-registration application on your behalf, and DNREC has confirmed that the B0D campaign may commence upon its receipt of this application. TMS will be separately mailing your dealership a copy of the individual self-registration application filed on your behalf, along with a letter from DNREC acknowledging receipt of the application. As explained in the Air Recordkeeping Section of the Guide to Federal, State and Local Requirements, you should retain your application and the DNREC letter along with your other B0D compliance records.
(2) As presented in the registration application submitted to DNREC, the B0D has maximum daily VOC and PM emissions, respectively, of no more than 0.55 and 0.5 pounds per day.\(^2\) These maximum daily VOC and PM emissions levels assume a vehicle processing time of approximately 2 hours for a Tundra.

(3) It is important that your dealership conducts the B0D in a manner consistent with these VOC and PM emissions levels presented by TMS to DNREC in the registration application. **Therefore, to ensure consistent emissions levels, your dealership should NOT process a total of more than one Tundra every 2 hours.** In addition, your dealership should not process more than one Tacoma vehicle every 1 hour to ensure compliance with your existing Tacoma LSC 90D permit.

(4) The self-registration requires that your dealership keep aggregate actual VOC and PM emissions for the Tundra B0D process below 10 pounds per day. As long as you limit your vehicle processing per #3 above, your daily emissions from B0D will be well below this 10 pound-per-day level.

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

III. AIR REGULATORY REQUIREMENTS: YOUR OBLIGATIONS

In addition to the emission limits for the Tundra B0D under your registration, your dealership must comply with certain personnel training, housekeeping, and recordkeeping requirements, as described below.

A. Housekeeping Obligations: Separate from the obligations under your registration, Delaware regulations require that you:

1. Do not use open containers for the storage or disposal of cloth or paper soaked with any VOC-containing materials (e.g., paints, solvents, coatings or B0D materials). Containers used for the storage or disposal of such cloths or papers must be kept closed, except when adding or removing material; and

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\(^2\) These per-day emissions calculations are based on a 24-hour day, and, therefore, are quite conservative. TMS has also calculated a “potential to emit” for B0D of 0.6 tons per year (tpy) of VOCs and 0.5 tpy of PM. These “potential to emit” calculations are based on Tundra Units in Operation (UIO). For the calculations, the largest Tundra UIO for a dealership in Delaware is multiplied by the VOC or PM emissions associated with processing 1 vehicle and then that number is multiplied by 150%. To ensure this PTE represents maximum potential emissions for application of CRCs to Tundras, the UIO used in the calculation covers not only the MYs 2000-2003 now subject to B0D, but also additional MYs 2004-2008 now being evaluated for a possible future CRC customer satisfaction program.
2. Do not store spent or fresh VOC-containing materials in open containers. Containers for the storage of spent or fresh VOC-containing materials must be kept closed, except when adding or removing materials; and

3. Use handling and transfer procedures that minimize spills during the transfer of the B0D materials to the Vaupel HSDR 3300 spray guns.

B. Training Requirements: Delaware regulations also require that all personnel conducting the B0D be trained in the proper use and handling of the B0D materials. You can satisfy this requirement if the personnel conducting the Tundra B0D carefully review this Dealer Information Packet and the Technical Instructions before participating in the Tundra B0D.

1. You should use the “Tundra B0D – Personnel Training Log” included in the Air Recordkeeping Section of this Guide to create a record for your files demonstrating that all personnel conducting the Tundra B0D have been properly trained.

C. Recordkeeping Obligations: Your dealership must maintain certain records to demonstrate that you are eligible for registration and approval. You must keep these records at your dealership for five (5) years beyond the date that you service the last Tundra under the B0D.

1. Air Emission Records
   a. Your dealership is required to maintain air emissions records pursuant to 7 DE Admin. Code 1102, § 9.3.1. Your dealership should maintain a record of actual VOC and PM emissions from the B0D and LSC 90D. You can use the “Tundra B0D and Tacoma LSC 90D Emissions Tracking Log” in the Air Recordkeeping Section for this purpose. This log is a tool for calculating actual VOC and PM emissions from the B0D and LSC 90D based on the number of Tundras and Tacomas you process on a daily basis.

2. Other Records
   You records also must include copies of:
   a. A copy of the individual self-registration application filed on your behalf, along with a letter from DNREC acknowledging receipt of the application (TMS will be mailing these two items to you separately, and you place them with your other B0D compliance records); 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.
(This page intentionally left blank.)
IMPORTANT: Please maintain these documents in your dealership’s records for a period of five (5) years after the date that you spray the last Tundra under the B0D.

Your dealership must maintain the documents and records listed below to comply with the record retention and availability requirements found in Delaware regulations. The following records should be maintained for five (5) years:

1. A log tracking the number of Tundra and Tacoma trucks you do per day and your daily emissions (use attached “Tundra B0D and Tacoma LSC 90D Emissions Tracking Log”); and
2. Records verifying that all employees performing the Tundra B0D have completed the applicable training requirements (use the attached “Tundra B0D – Personnel Training Log”); and
3. A copy of the individual self-registration application filed on your behalf, along with a letter from DNREC acknowledging receipt of the application (TMS will be mailing these two items to you separately, and you place them with your other B0D compliance records); and
4. Spray Equipment Manufacturer’s Specifications; and
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).

Notes:

I. To fill out the “Tundra B0D and Tacoma LSC 90D Emissions Tracking Log,” you can also use the Emissions Estimator that follows the chart.
II. You do not need to do anything with items (3) through (5) above. You should simply keep those documents in your files. You will only need to provide them if requested by a government agency.
III. You must keep these records for five (5) years. Since the B0D has no end date, you should keep the records for five years after the date you treat the last Tundra under the B0D.
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.

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

**Step 1:** Enter "Reporting Month" and "Dealership Name."

**Step 2: (1)** Enter the date and the number of trucks that you serviced with B0D and LSC materials on that date and update the total number of trucks processed. **You must process no more than 12 Tacomas per day;** (2) Enter the number of Tacomas treated prior to the reporting month. **You must process no more than 1,224 Tacoma trucks during the LSC 90D.**

**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.

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

<table>
<thead>
<tr>
<th>LSC 90D Number of Tacomas Processed</th>
<th>0</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC</td>
<td>0</td>
<td>0.11</td>
<td>0.22</td>
<td>0.33</td>
<td>0.44</td>
</tr>
<tr>
<td>PM</td>
<td>0</td>
<td>0.10</td>
<td>0.20</td>
<td>0.30</td>
<td>0.40</td>
</tr>
</tbody>
</table>

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Tundra B0D and Tacoma LSC 90D Emissions Tracking Log

Reporting Month: _____ Dealership name: ________________________________

Total Number of Tacoma Trucks Treated Prior to Reporting Month: ____________

<table>
<thead>
<tr>
<th>B0D</th>
<th>LSC 90D</th>
<th>Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Number of Tundras</td>
<td>Time of Completion</td>
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</tbody>
</table>

Use the Emissions Estimator to determine the amount of emissions for each compound below.

VOC  PM

Make Copies As Necessary
Keep Records for 5 Years

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Tundra B0D and Tacoma 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 Tundra B0D and Tacoma LSC 90D Emissions Tracking 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 Delaware B0D and LSC 90D Production Log.

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

<table>
<thead>
<tr>
<th>LSC 90D Number of TACOMAS Processed</th>
<th>B0D Number of TUNDRA Processed</th>
<th>VOC</th>
<th>PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>0.11</td>
<td>0.10</td>
</tr>
<tr>
<td>2</td>
<td>3</td>
<td>0.22</td>
<td>0.20</td>
</tr>
<tr>
<td>3</td>
<td>4</td>
<td>0.33</td>
<td>0.30</td>
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<tr>
<td>4</td>
<td></td>
<td>0.44</td>
<td>0.40</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>0.55</td>
<td>0.58</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>0.65</td>
<td>0.72</td>
</tr>
<tr>
<td>7</td>
<td></td>
<td>0.75</td>
<td>0.82</td>
</tr>
</tbody>
</table>
Tundra B0D – Personnel Training Log

Reporting Year: ______ Dealership name and location: ____________________________________________________________

Instructions: Dealerships should use this log to confirm that the employees conducting the Tundra B0D have been trained as required by 7 Del. Admin. Code, Reg. No. 1124 § 11.3.5.1. Maintain this log in your records for five years after you spray the last Tundra under the B0D.

Pursuant to 7 Del. Admin. Code, Reg. No. 1124 § 11.3.5.1, the undersigned have reviewed all of the Tundra Corrosion-Resistant Compound Campaign B0D materials, including the Getting Started Guide, the Federal, State and Local Requirements Guide, and the Technical Instructions, and understand the proper use, handling and operation of the Tundra B0D materials and equipment.

Employee Names/Date Trained

_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________

Signature of Dealer Principal:

_______________________________________________  __________________________________________________________

Date:  __________________________________________________________

Address & Contact Information for Dealer Principal:

_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________
_______________________________________________  __________________________________________________________

This record must be maintained for 5 years.
Duplicate as Necessary
(This page intentionally left blank)
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.

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.

State: Jan. 2009
This gun may only be used for pressure containers which treads have a slot.
SECTION 1: PRODUCT IDENTIFICATION

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

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

SECTION 2: HAZARDOUS INGREDIENTS

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

<table>
<thead>
<tr>
<th>Property</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Color</td>
<td>Tan</td>
</tr>
<tr>
<td>Appearance</td>
<td>Viscous Liquid</td>
</tr>
<tr>
<td>Odor</td>
<td>Oil</td>
</tr>
<tr>
<td>Boiling Point (initial)</td>
<td>NA</td>
</tr>
<tr>
<td>Evaporation Rate (n-Butyl Acetate=1):</td>
<td>&lt;&lt;1</td>
</tr>
<tr>
<td>Vapor Pressure (mmHg @ 20°C)</td>
<td>3.4</td>
</tr>
<tr>
<td>Vapor Density (air=1)</td>
<td>NA</td>
</tr>
<tr>
<td>Solubility in Water</td>
<td>Not Determined</td>
</tr>
<tr>
<td>Specific Gravity</td>
<td>.9-1.0</td>
</tr>
<tr>
<td>pH</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Percent Volatile by Volume</td>
<td>0</td>
</tr>
</tbody>
</table>

SECTION 11: DISPOSAL CONSIDERATIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

Manufacturer: Auson AB  
US Distributor: Soken Trade Corporation
Verkstadsgatan 3  
S-434 42 Kungsbacka  
Sweden  
www.auson.se
12055 Sherman Way  
North Hollywood, CA  
USA  
www.noxudolusa.com
PHONE: +46 300-562000  (800) 598-3535
FAX: +46 300-562001  (818) 308-8427

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

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

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

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

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

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

EMERGENCY OVERVIEW:
CAUTION! COMBUSTIBLE LIQUID.

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

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

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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

FLAMMABLE PROPERTIES: Not flammable. Combustible.

AUTO IGNITION TEMPERATURE (ASTM E659):
HOT-FLAME AUTOIGNITION TEMPERATURE (AIT):
  MINIMUM IGNITION TEMPERATURE: 750°F
  IGNITION DELAY: 12 Seconds
  BAROMETRIC PRESSURE, TORR: 766
COOL-FLAME AUTOIGNITION TEMPERATURE (CFT):
  MINIMUM IGNITION TEMPERATURE: 745°F
  IGNITION DELAY: 120 Seconds
  BAROMETRIC PRESSURE, TORR: 766
REACTION THRESHOLD TEMPERATURE FOR PRE-FLAME (RTT):
  MINIMUM REACTION TEMPERATURE: 740°F

LIMITS OF FLAMMABILITY IN GENERAL ACCORDANCE WITH ASTM E-681 AT 200°C
  LOWER FLAMMABLE LIMIT (LFL): 1.81 %
  UPPER FLAMMABLE LIMIT (UFL): See Note
  Note: Due to the nature of the sample and its addition into the test apparatus, it is difficult to determine the upper flammable limit.

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

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

SHELF LIFE: See label on packaging.

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

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

<table>
<thead>
<tr>
<th>CAS NO.</th>
<th>CHEMICAL NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>64741-88-4</td>
<td>Solvent-refined heavy paraffinic distillate mg/m3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>5</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>none</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>none</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>5</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>none</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>none</td>
</tr>
<tr>
<td>68783-96-0</td>
<td>PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION MG/M3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>68410-37-7</td>
<td>FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL MG/M3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>8002-74-2</td>
<td>PARAFFIN AND HYDROCARBON WAXES MG/M3</td>
</tr>
<tr>
<td>OSHA PEL-TWA:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>OSHA PEL CEILING:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV-TWA:</td>
<td>2 (FUME)</td>
</tr>
<tr>
<td>ACGIH TLV STEL:</td>
<td>NONE</td>
</tr>
<tr>
<td>ACGIH TLV CEILING:</td>
<td>NONE</td>
</tr>
</tbody>
</table>

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

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

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

14808-60-7  CRYSTALLINE SILICA
MG/M3
OSHA PEL-TWA:  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:** 0.96 at 20°C (68°F) (Water =1)  
**EVAPORATION RATE:** (BuAc=1): Not applicable  
**POUR POINT (ASTM D97):** +30°F  
**AUTOIGNITION TEMPERATURE:** >750°F (399°C)  
**FLASH POINT:** 285°F (140°C) ASTM D93  
**pH:** Not available  
**PERCENT SOLIDS BY WEIGHT:** 98.9%  
**VISCOSITY:** 500-650 Mpas - 73.4°F (23°C)  
**VOLATILE ORGANIC COMPOUNDS (VOC):** 10.7 g/L using EPA Method 24  
**COLD FREEZE POINT (ASTM D1177):** +25°F  
**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

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

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

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

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

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA


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

U.S. FEDERAL REGULATORY STATUS

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

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

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

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

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

STATE REGULATIONS:

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

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

LOCAL REGULATIONS

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

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

INTERNATIONAL REGULATIONS:

Europe: All ingredients conform to the EU requirements.

Regulation (EC) nr. 1907/2006

EEC-directive 2006/121/2006

No label required

16. OTHER INFORMATION

Label Requirements: WARNING! COMBUSTABLE!

Hazardous Material Information System (HMIS):

<table>
<thead>
<tr>
<th>Health</th>
<th>1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flammability</td>
<td>1</td>
</tr>
<tr>
<td>Reactivity</td>
<td>0</td>
</tr>
<tr>
<td>Personal Protection</td>
<td></td>
</tr>
</tbody>
</table>

Return to Table of Contents
National Fire Protection Association (NFPA):

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

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

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

ADDITIONAL INFORMATION:

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

This information is furnished without warranty, expressed or implied, except that it is accurate to the best knowledge of Soken Trade Corporation. The data on this sheet are related only to the specific material designated herein. Soken Trade Corporation assume s 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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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. Please note that this model letter and attachments refer to “CRC program” instead of “B0D” to ensure that the notification to your local fire code enforcement official covers not only B0D but any CRC program that may be offered for Toyota vehicles in the future when conducted in the same space that you are now using for Tacoma LSC 90D.

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

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

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

In either Appendix A or B (which one depends on your location), you will find a model letter and attachments that you can use to notify your fire code enforcement official. You will
need to add some descriptive information confirming that the space where you will conduct the CRC program is the same now being used for Tacoma LSC 90D.

These materials include a Determination of Compliance with the applicable fire codes prepared by Commercial Construction Consulting, Inc. (“C3”) for TMS. To identify your local fire official and the Appendix (i.e., A, or B) that you should use to contact the appropriate official, go to Table 1 (starting at page 63).

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

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

   Locate your city/town/county on Table 1 (starting at page 59) to see whether it has any additional building, zoning, or other requirements applicable to the CRC program and contact your local officials as indicated.

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

A. FIRE CODE

1. The B0D should not require a state fire permit under the Delaware State Fire Prevention Code (Fire Code) and Appendix A contains a Determination of Compliance that the B0D complies with the Fire Code (or locally adopted fire codes, as appropriate) so long as you conduct the B0D in the same location where you are conducting the Tacoma LSC 90D and you continue to follow the procedures outlined in this Fire, Building & Zoning Code Section and the Site Selection Section of the Dealer Packet. The Fire Code does require you to inform the appropriate fire code enforcement official (which in some locations may be the State Fire Marshal’s office) before commencing B0D operations at your dealership. See Table 1 (starting at page 59) 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 page 59) 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
   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

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3 Delaware has adopted the National Fire Protection Association’s Uniform Fire Code – NFPA 1 (2009 ed.) , which incorporates NFPA 33, Standard for Spray Application Using Flammable or Combustible Materials, (2007 ed.), which has specific provisions governing spraying operations like the B0D. For those Delaware dealerships subject to an additional fire code (such as the 2009 edition of the International Fire Code or different version of NFPA 1) (as identified in Table 1), conformance to the requirements outlined above will ensure compliance with your locally adopted fire code.
e. The materials applied to the truck frame include only Class IIIB liquids and do not include any organic peroxide catalyst\(^4\) (Note: Each of the B0D’s CRC materials that you are being provided – interior and exterior - satisfy this requirement); and

f. Fire extinguishers be provided in the vicinity\(^5\) of the B0D operation (Note: fire extinguishers must be rated “B”, “AB”, or “ABC”).

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

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

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

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

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

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

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

(Go to Next Page for Building Code Discussion)

\(^4\) Among other requirements, in order to conduct the B0D consistent with the Delaware State Fire Prevention Regulations, 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.

\(^5\) See the Site Selection Section in this Dealer Information Packet for specific distancing requirements for fire extinguishers in the vicinity of the spraying area.
B. BUILDING CODE

1. The B0D should not require a building permit under the relevant local building codes 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 59.)

**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](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 Tundra B0D (if any). It is organized by the city/local jurisdiction where your dealership is located. **IF THE LOCALITY WHERE YOU PLAN TO CONDUCT THE B0D IS NOT LISTED IN TABLE 1 (STARTING AT PAGE 59), PLEASE GO TO THE C.L.E.A.N. DEALER WEBSITE ([HTTP://CLEANDEALER.COM](http://CLEANDEALER.COM)) OR CALL THE EH&S HOTLINE (877-572-4347).** The sections below briefly review these requirements.

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

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6 Delaware does not adopt a statewide building or mechanical code.

7 In particular, the application of the CRC materials being used for the B0D should not trigger any requirements for changes or modifications to the electrical wiring. These liquids are not flammable and are not expected to create a flammable vapor area and any overspray will be controlled with temporary partitions.
**Regulatory Note – Other Generally Applicable Local Laws and Regulations:** This Guide does not address other local laws and regulations that may apply generally to your dealership’s operations. Such laws and regulations may impose, among other requirements, general housekeeping and/or performance standards that require you to safeguard against improper release of materials that may pose health or environmental risks and to clean up (and report to appropriate authorities) any such improper release.

Unless noted in Table 1, your dealership is likely not subject to additional requirements under local zoning and building codes as a result of the B0D. However, should the need arise to discuss the B0D with your local authorities (in addition to the appropriate fire code enforcement official), the information assembled in Appendix A or Appendix B can be used for that purpose as well.
<table>
<thead>
<tr>
<th>Location</th>
<th>Local Fire Code Official &amp; Fire Code Type</th>
<th>Contact</th>
<th>Other Potentially Relevant Local Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delaware (State)</td>
<td></td>
<td></td>
<td>You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.</td>
</tr>
<tr>
<td>Dover</td>
<td>David J. Truax, Fire Marshal</td>
<td>Ann Marie Townshend</td>
<td>Combination Jurisdiction Materials to contact local fire official are found in Appendix A.</td>
</tr>
<tr>
<td></td>
<td>Department of Planning and Inspections</td>
<td>City Hall – The Plaza P.O. Box 475 Dover, DE 19903-0475 (302) 736-7010</td>
<td></td>
</tr>
<tr>
<td>Kent County</td>
<td>B. Scott Bullock, Deputy Chief Fire Marshal</td>
<td>Sarah E. Keifer, ACIP</td>
<td>Contact: Sarah E. Keifer, ACIP Director Kent County Planning and Zoning Department of Planning Services 555 Bay Road Dover, DE 19901</td>
</tr>
<tr>
<td></td>
<td>Office of the State Fire Marshal Kent/Headquarters Division 1537 Chestnut Grove Road Dover, DE 19904-1544 (302) 739-5665</td>
<td></td>
<td>NFPA Jurisdiction -- Adopts the Delaware State Fire Prevention Regulations. The State Fire Marshal's Office has jurisdiction. Materials to contact the local fire official are found in Appendix B.</td>
</tr>
<tr>
<td>Newmark</td>
<td>Matthew O. Schumacher, Fire Marshal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Location</td>
<td>Local Fire Code Official &amp; Fire Code Type</td>
<td>Other Potentially Relevant Local Requirements</td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Newark, DE 19711</td>
<td>(302) 366-7077</td>
<td>Please send a copy of the materials in Appendix A to both the Fire Marshal and Code Enforcement Officer.</td>
<td></td>
</tr>
<tr>
<td>Jim Keisel</td>
<td>Code Enforcement Officer 220 Elkton Road Newark, DE 19711 Phone: 302-366-7075</td>
<td>Dealership should verify whether or not the location where it will conduct the B0D is located within a (1) a wellhead protection area and/or recharge protection area, or (2) a floodplain or floodway and comply with any additional requirements that may apply.</td>
<td></td>
</tr>
<tr>
<td>Combo</td>
<td>Materials to contact local fire official are found in Appendix A.</td>
<td>You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contact:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Roy H. Lopata Director of Planning &amp; Development Department 220 Elton Road Newark, DE 19711 (302) 366-7030</td>
<td></td>
</tr>
<tr>
<td>New Castle County</td>
<td>Alan L. Brown, Deputy Chief Fire Marshal Office of the State Fire Marshal New Castle Division 2307 MacArthur Road New Castle, DE 19720-2426 (302) 323-5375</td>
<td>You should verify that the B0D will not constitute a change in use or impermissible use under your zoning permit.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NFPA Jurisdiction-- Adopts the Delaware State Fire Prevention Regulations. The State Fire Marshal's Office has jurisdiction. Materials to contact the local fire official are found in Appendix B.</td>
<td>Contact:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dave Culver, General Manager Department of Land Use New Castle County 87 Read’s Way, NCC Government Center, New Castle Corporate Commons New Castle, DE 19720 (302) 395-5463</td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX A

Materials to Demonstrate Compliance with the Delaware State Fire Prevention Regulations and Local Fire Code Requirements

Compliance Information

&

Materials to submit to the Appropriate Fire Code Enforcement Official

- Model Letter
- C3 Compliance Determination with Delaware State Fire Prevention Regulations and Locally Adopted Fire Codes (As Applicable) and Attached Representative Process Description and MSDSs
- Dealer Information Sheet

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

Your local jurisdiction is subject to the Delaware State Fire Prevention Regulations (which adopts the 2009 edition of the NFPA 1 and 2007 edition of NFPA 33, by reference) and the 2009 IFC, adopted locally by your jurisdiction.8

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

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

- **You should do the following:**
  - Address the model letter to the appropriate fire code enforcement official and put it on your dealership’s letterhead. *(See Table 1 beginning at page 59.)*
  - Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
    - Service area where the CRC program will be conducted *(Note: this should be the same location where you are/were conducting the Tacoma LSC 90D);*
    - Storage area to be used for CRC materials; and
    - Ventilation system in the area where the CRC program will be conducted.
  - **Remember - Enclose the following with the cover letter to the appropriate fire code enforcement official:**
    - The **Determination of Compliance letter prepared by C3**, which includes a representative process description and MSDSs
    - The **completed dealership information sheet** from Appendix A2.

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8 Certain Delaware dealerships are subject to an additional fire code (such as the 2009 edition of the International Fire Code or different version of NFPA 1) in addition to the State Fire Code, conformance to the requirements outlined in this Dealer Packet address compliance with the state and your locally adopted fire code.

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- Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.
- You may wish to consider calling your local fire code official before submitting the letter and attachments to let them know you will be making the submission.

**IMPORTANT:** To avoid confusion, make sure to send the letter and attachments to ensure that the fire official has more than a verbal description of the CRC program.
APPENDIX A2: Model Letter for Jurisdictions Subject to the Delaware State Fire Prevention Regulations and Locally Adopted IFC, C3 Compliance Determination and Attached Representative Process Description and MSDSs

(This page intentionally left blank.)
Re: NOTIFICATION OF INTENT TO CONDUCT CORROSION-RESISTANT COMPOUND CAMPAIGN IN THE APPROVED SPRAYING AREA OF [LOCAL DEALERSHIP]

Dear __________:

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

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

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

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

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

We intend to begin offering the CRC program at our dealership [Insert Date at least 10 days from now], unless we hear from you otherwise. For your information, we are attaching site-specific information which confirms that the location where we will conduct this CRC program is the same location you have already approved for undercoating operations. We also are attaching a Determination of Compliance prepared by Toyota’s fire code expert, Commercial Construction Consulting, Inc. (“C³”), finding that the CRC program as designed conforms to the Delaware State Fire Prevention Regulations and the locally adopted 2009 International Fire Code. This Determination of Compliance includes as attachments the Material Safety Data Sheets for the CRC materials and a representative process description. We believe this information demonstrates that the CRC program will be conducted in accordance with all
applicable laws, regulations, and other codes and complies with your previous approval of these operations at our dealership.

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

Sincerely,

Attachments:
- C³ Determination of Compliance with attached Representative Process Overview and CRC Material MSDSs
- Dealership Information Sheet
August 24, 2011

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

Re: Toyota Corrosion-Resistant Compound (“CRC”) Application Program
Compliance with the Delaware State Fire Prevention Regulations and Locally Adopted 2009 International Fire Code

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

Delaware has adopted the National Fire Protection Association’s Uniform Fire Code – NFPA 1 (2009 ed.), which incorporates NFPA 33, the Standard for Spray Application Using Flammable or Combustible Materials, (2007 ed.), which has specific provisions governing spraying operations like the CRC program. Certain Delaware jurisdictions have also adopted the 2009 International Fire Code (IFC) 2009, which means certain activities in those jurisdictions must comply with both NFPA and IFC requirements. As a result of this code structure, we have analyzed NFPA and the IFC as adopted and amended by Delaware and certain local jurisdictions. Where there is a conflict between the NFPA and IFC provisions, the more restrictive provision applies.

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

As discussed below, we have determined that the CRC program will be in compliance with the applicable provisions of NFPA 33 (2007) and the 2009 IFC. We have further determined that as long as the CRC program is conducted in the spray area previously approved for the LSC 90D, and in accordance with operational requirements of the NFPA 33’s vehicle undercoating exemption, then the CRC program continues to qualify for the exemption in NFPA 33, Section 14.1, paragraph 14.1.1 and further approval should not be required.

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

Regulatory Analysis
NFPA 33 (2007)
NFPA 33, Section 14.1 notes that vehicle spray undercoating operations conducted in an area with adequate ventilation are exempt from the provisions of NFPA 33 if certain operational requirements are met:

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

14.1.1: Spray undercoating or spray body lining of vehicles that is conducted in an area that has adequate natural or mechanical ventilation shall be exempt from the provisions of this standard, if all of the requirements of 14.1.1.1 through 14.1.1.4 are met.

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

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

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

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

1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids

2) Not contain any solvent or component that has a flash point below 100°F (37.8°C)

3) Consist only of Class IIIB liquids and not include any organic peroxide catalyst

Analysis: The CRC program meets the requirements in paragraph 14.1.1 and therefore qualifies for the undercoating exemption in NFPA 33: 1) Both materials to be used are Class IIIB combustible liquids; 2) Dealers are expected to apply the materials in the same spray area that already has been approved for a similar corrosion-resistant compound program known as the “LSC 90D”; and 3) Dealers also must maintain adequate ventilation in this approved spray area and otherwise conduct the CRC program in a manner that meets operational requirements of the Delaware State Fire Prevention Regulations’ vehicle undercoating exemption.

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

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

**Exception:** Automobile undercoating operations and spray-on automotive lining operations conducted in areas with approved natural or mechanical ventilation shall be exempt from the provisions of Section 1504 when approved and where utilizing Class IIIA or Class IIIB combustible liquids.
Analysis: The CRC program meets the requirements of the Exception in Section 1504.2 and therefore qualifies for the undercoating exemption in the IFC: 1) Both materials to be used are Class IIIB combustible liquids; 2) Dealers are expected to apply the materials in the same spray area that already has been approved for a similar corrosion-resistant compound program known as the “LSC 90D”; and 3) Dealers also must maintain adequate ventilation in this approved spray area and otherwise to conduct the CRC program in a manner that meets operational requirements of the IFC’s vehicle undercoating exemption.

**Overall Analysis:** The requirements of the IFC for spraying spaces are similar to the provisions of NFPA 33 Section 14.1. In this case the provisions of NFPA 33 are more restrictive than those of the IFC governing the spray application of Class IIIB liquids, so dealers subject to the IFC and NFPA will be instructed to conduct the CRC program consistent with the more restrictive NFPA 33 requirements.

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

If a dealer chooses to conduct the CRC program in a different service bay from the one previously approved, then the operations at the new bay must comply with the requirements for an exemption under NFPA 33 Section 14.1. We recommend that the dealer obtain approval from the local fire official if it chooses to conduct the CRC program in the new spray area.

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

Very truly yours,

Doug Anderson  
Manager, Code Advisory Group

Attachments
**Tundra B0D Process Overview**

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

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

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

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

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

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

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

- **Reattach truck bed assembly.**

- **Raise truck on lift.**

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

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

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

Manufacturer: Auson AB
US Distributor: Soken Trade Corporation
Verkstadsgatan 3
S-434 42 Kungsbacka
Sweden
www.auson.se

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

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

PREPARED BY: MSDS Authoring Services
ISSUE DATE: March 1, 2011
VERSION: 1

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

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

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

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

EMERGENCY OVERVIEW:
CAUTION! COMBUSTIBLE LIQUID.

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

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

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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

FLAMMABLE PROPERTIES: Not flammable. Combustible.

AUTO IGNITION TEMPERATURE (ASTM E659):

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

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

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

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

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

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE

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

SHELF LIFE: See label on packaging.

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

### 8. EXPOSURE CONTROLS / PERSONAL PROTECTION

**AIRBORNE EXPOSURE LIMITS:** See Section 2 above.

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

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

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

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

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

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

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

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

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

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

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

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

10. STABILITY AND REACTIVITY

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

11. TOXICOLOGICAL INFORMATION

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

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

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

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

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA


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

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15. REGULATORY INFORMATION

U.S. FEDERAL REGULATORY STATUS

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

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

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

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

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

STATE REGULATIONS:

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

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

LOCAL REGULATIONS

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

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

INTERNATIONAL REGULATIONS:

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

16. OTHER INFORMATION

Label Requirements: WARNING! COMBUSTABLE!

<table>
<thead>
<tr>
<th>Hazardous Material Information System (HMIS):</th>
<th>Health</th>
<th>Flammability</th>
<th>Reactivity</th>
<th>Personal Protection</th>
</tr>
</thead>
</table>

Return to Table of Contents
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
SECTION 1: PRODUCT IDENTIFICATION

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

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

SECTION 2: HAZARDOUS INGREDIENTS

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

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

Calcium Carbonate  
CAS #471-34-1  
5-10  OSHA PEL:  5 mg/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, CO$_2$, water spray, or regular foam. Large Fires: Water spray, fog, or regular foam. Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles. If this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

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

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

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

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

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

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

SECTION 7: SAFE HANDLING INFORMATION

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

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

SECTION 8: EXPOSURE CONTROLS

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

Ventilation: General and local exhaust.

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

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

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

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

Color: Tan

Appearance: Viscous Liquid

Odor: Oil

Boiling Point (initial): NA

Evaporation Rate (n-Butyl Acetate=1): <<1

Vapor Pressure (mmHg @ 20°C): 3.4

Vapor Density (air=1): NA

Solubility in Water: Not Determined

Specific Gravity: .9-1.0

pH: Not Applicable

Percent Volatile by Volume: 0

SECTION 11: DISPOSAL CONSIDERATIONS

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

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

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

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

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

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

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

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

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

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

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

Although the information contained herein is believed to be reliable, it is furnished without warranty of any kind. This information is not intended to be all-inclusive as to the manner and conditions of use, handling, and storage.
ATTACHMENT 2: DESCRIPTION OF LOCATION WHERE THE CRC PROGRAM WILL TAKE PLACE AT [INSERT NAME OF DEALERSHIP]

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

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

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

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

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

  Insert a description of the method of ventilation in the vehicle service area where the CRC program will be conducted.
(This page intentionally left blank.)
APPENDIX B

Materials to Demonstrate Compliance with the Delaware State Fire Prevention Regulations

Compliance Information &

Materials to submit to the Appropriate Fire Code Enforcement Official
- Model Letter
- C3 Compliance Determination with Delaware State Fire Prevention Regulations and Attached Representative Process Description and MSDSs
- Dealer Information Sheet

(Electronic copies or available on the C.L.E.A.N. Dealer website - http://cleandealer.com)
Appendix B1: Delaware State Fire Prevention Regulations Jurisdictions—Summary of Fire Code Requirements

Your local jurisdiction is subject to the Delaware State Fire Prevention Regulations (which adopts the 2009 edition of the NFPA 1 and 2007 edition of NFPA 33, by reference).

- **Before you begin conducting the B0D, you will need to provide your local fire code enforcement official with information about this CRC program and your intent to conduct it in the same space where you are/were conducting the Tacoma LSC 90D.** Under the Delaware State Fire Prevention Regulations, the appropriate fire code enforcement official (which in your case is the State Fire Marshal’s Office) has the authority to require plans and specifications to ensure compliance with applicable codes and standards, and may require an operating permit for these spraying operations.

- **To assist you with contacting your appropriate fire code enforcement official, Appendix B2 contains** (1) a model letter, (2) a Determination of Compliance from Commercial Construction Consulting Inc. ("C3") which includes a representative process description and MSDSs, (3) a background information sheet that you must complete that will provide your appropriate fire code enforcement official with relevant dealer-specific information about where the operation will take place. *(Note: Electronic copies of these materials can be found on the C.L.E.A.N. Dealer website - [http://cleandealer.com](http://cleandealer.com)).*

- **You should do the following:**
  - Address the model letter to the appropriate fire code enforcement official and put it on your dealership’s letterhead. *(See Table 1 beginning at page 59.)*
  - Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
    - Service area where the CRC program will be conducted *(Note: this should be the same location where you are/were conducting the Tacoma LSC 90D);*
    - Storage area to be used for CRC materials; and
    - Ventilation system in the area where the CRC program will be conducted.
  - Remember - **Enclose the following with the cover letter to the appropriate fire code enforcement official:**
    - The Determination of Compliance letter prepared by C³; which includes a representative process description and MSDSs
    - The completed dealership information sheet from Appendix B2.
  - Make a copy of the letter and attachments for your records before submitting to the appropriate fire code enforcement official.
  - You may wish to consider calling your local fire code official before submitting the letter and attachments to let them know you will be making the submission.
IMPORTANT: To avoid confusion, make sure to send the letter and attachments to ensure that the fire official has more than a verbal description of the CRC program.
APPENDIX B2: Model Letter for Jurisdictions Subject to the Delaware State Fire Prevention Regulations, C3 Compliance Determination and Attached Representative Process Description and MSDSs

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

Dear __________:

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

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

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

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

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

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

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with your previous approval of these operations at our dealership.

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

Sincerely,

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

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

Re: Toyota Corrosion-Resistant Compound ("CRC") Application Program
Compliance with the Delaware State Fire Prevention Regulations

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

This analysis is based on the 2009 version of NFPA 1 (this standard in turn references NFPA 33 (2007) for spraying of flammable and combustible materials), which has been adopted in part as the by the State of Delaware.

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

As discussed below, we have determined that the CRC program will be in compliance with the applicable provisions of NFPA 33. We have further determined that as long as the CRC program is conducted in the spray area previously approved for the LSC 90D, and in accordance with operational requirements of the NFPA 33’s vehicle undercoating exemption, then the CRC program continues to qualify for the exemption in NFPA 33, Section 14.1, paragraph 14.1.1 and further approval should not be required.

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

Regulatory Analysis

NFPA 33

NFPA 33, Section 14.1 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. The area must have adequate ventilation.
2. The area must not be enclosed.
3. The operations must be conducted under controlled conditions.
4. The operations must be conducted in a manner that minimizes the risk of fire.
5. The operations must be conducted in a manner that minimizes the risk of explosion.
6. The operations must be conducted in a manner that minimizes the risk of toxicity.

As discussed above, the CRC program is conducted in an area that has adequate ventilation, is not enclosed, and is conducted under controlled conditions. Therefore, the CRC program qualifies for the exemption in NFPA 33, Section 14.1, paragraph 14.1.1 and further approval should not be required.
**Regulation:** Section 14.1 (Automobile Undercoating and Body Lining):

14.1.1: Spray undercoating or spray body lining of vehicles that is conducted in an area that has adequate natural or mechanical ventilation shall be exempt from the provisions of this standard, if all of the requirements of 14.1.1.1 through 14.1.1.4 are met.

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

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

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

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

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

**Analysis:** The CRC program meets the requirements in paragraph 14.1.1 and therefore qualifies for the undercoating exemption in NFPA 33: 1) Both materials to be used are Class IIIB; 2) Dealers are expected to apply the materials in the same spray area that already has been approved for a similar corrosion-resistant compound program known as the “LSC 90D”; and 3) Dealers also must maintain adequate ventilation in this approved spray area and otherwise conduct the CRC program in a manner that meets operational requirements of the Delaware State Fire Prevention Regulations’ vehicle undercoating exemption.

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

If a dealer chooses to conduct the CRC program in a different service bay from the one previously approved, then the operations at the new bay must comply with the requirements for an exemption under NFPA 33 Section 14.1. We recommend that the dealer obtain approval from the local fire official if it chooses to conduct the CRC program in the new spray area.

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

Very truly yours,

Doug Anderson
Manager, Code Advisory Group

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

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

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

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

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

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

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

- **Reattach truck bed assembly.**

- **Raise truck on lift.**

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

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

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**Return to Table of Contents**
1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

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

Product Use: Vehicle Underbody Coating

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

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

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

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

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

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

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

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

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

EMERGENCY OVERVIEW:
CAUTION! COMBUSTIBLE LIQUID.

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

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

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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

Return to Table of Contents
5. FIRE AND EXPLOSION HAZARD DATA

FLAMMABLE PROPERTIES: Not flammable. Combustible.

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

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

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

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

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

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE

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

SHELF LIFE: See label on packaging.

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

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

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

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

<table>
<thead>
<tr>
<th>CAS Number</th>
<th>Substance</th>
<th>OSHA PEL-TWA</th>
<th>OSHA PEL STEL</th>
<th>OSHA PEL CEILING</th>
<th>ACGIH TLV-TWA</th>
<th>ACGIH TLV STEL</th>
<th>ACGIH TLV CEILING</th>
</tr>
</thead>
<tbody>
<tr>
<td>1317-65-3</td>
<td>CALCIUM CARBONATE (LIMESTONE)</td>
<td>15 FOR TOTAL DUST; 5 FOR RESPIRABLE FRACTION</td>
<td>NONE</td>
<td>NONE</td>
<td>0 FOR TOTAL DUST; 3 FOR RESPIRABLE FRACTION</td>
<td>NONE</td>
<td>NONE</td>
</tr>
<tr>
<td>1333-86-4</td>
<td>CARBON BLACK</td>
<td>3.5</td>
<td>NONE</td>
<td>NONE</td>
<td>3.5</td>
<td>NONE</td>
<td>NONE</td>
</tr>
<tr>
<td>14808-60-7</td>
<td>CRYSTALLINE SILICA</td>
<td>10/(%SIO2+2) (RESPIRABLE)</td>
<td>NONE</td>
<td>NONE</td>
<td>0.025 (RESPIRABLE)</td>
<td>NONE</td>
<td>NONE</td>
</tr>
</tbody>
</table>

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

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

U.S. FEDERAL REGULATORY STATUS

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

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

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

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

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

STATE REGULATIONS:

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

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

LOCAL REGULATIONS

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

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

INTERNATIONAL REGULATIONS:

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

16. OTHER INFORMATION

Label Requirements: WARNING! COMBUSTABLE!

Hazardous Material Information System (HMIS):

<table>
<thead>
<tr>
<th></th>
<th>Health</th>
<th>Flammability</th>
<th>Reactivity</th>
<th>Personal Protection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flammability</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reactivity</td>
<td></td>
<td></td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

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National Fire Protection Association (NFPA):

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

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

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

ADDITIONAL INFORMATION:

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

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

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

END OF MSDS
SECTION 1: PRODUCT IDENTIFICATION

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

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

SECTION 2: HAZARDOUS INGREDIENTS

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

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

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

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

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC )

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

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

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

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

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

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

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

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

SECTION 7: SAFE HANDLING INFORMATION

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

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

SECTION 8: EXPOSURE CONTROLS

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

Ventilation: General and local exhaust.

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

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

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

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

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

SECTION 11: DISPOSAL CONSIDERATIONS

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

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

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

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

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

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

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

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

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

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

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

Although the information contained herein is believed to be reliable, it is furnished without warranty of any kind. This information is not intended to be all-inclusive as to the manner and conditions of use, handling, and storage.
ATTACHMENT 2: DESCRIPTION OF LOCATION WHERE THE CRC PROGRAM WILL TAKE PLACE AT [INSERT NAME OF DEALERSHIP]

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

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

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

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

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

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

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

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

**Regulatory Note Regarding EPA ID Number:** Prior to beginning the LSC 90D, your dealership should have obtained an EPA Hazardous Waste ID Number if it did not already have one. Although the B0D should not generate any hazardous waste, as discussed above, if you conduct the B0D in the same spray space as the LSC 90D you will need to manage any 90D-only or B0D-90D combined waste from the common B0D-LSC 90D spray space as hazardous waste, which requires an EPA Hazardous Waste ID Number. The EPA ID Number requirement applies to each location at your dealership with a separate mailing address. If you do not have an EPA Hazardous Waste ID Number for the building where the B0D and LSC 90D will be conducted, please call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.
Regulatory Note Regarding B0D Tarps and Partitions: If, as we assume, the LSC 90D and B0D are conducted in a common spray space, the tarps/partitions used 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 B0D WILL NOT IMPACT YOUR GENERATOR STATUS.**

2. **FOR ALL OTHER DEALERSHIPS, IF YOU GENERATE HAZARDOUS WASTE, YOU MUST HAVE NOTIFIED THE DELAWARE DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL 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 REGISTERED SMALL QUANTITY GENERATOR, DO NOT GENERATE MORE THAN 220 POUNDS OF HAZARDOUS WASTE PER MONTH, OR ACCUMULATE MORE THAN 2,200 POUNDS OF HAZARDOUS WASTE AT ANY TIME, THE B0D WILL NOT IMPACT YOUR GENERATOR STATUS.**

   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 pound-per-month waste generation level and the 2,200-pound 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.**
In Delaware, 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.)

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.