TOYOTA

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

DATE: 2009

RE: Information Packet for LSC 90D

LSC 90D - LIMITED SERVICE CAMPAIGN FOR 2001 - 2004 MODEL YEAR TACOMAS

CONNECTICUT DEALER INFORMATION PACKET

This bound volume contains two parts of the Connecticut Dealer Information Packet—the **Getting Started Guide** and the **Federal, State and Local Requirements Guide.** The third part—the **Technical Instructions**—is bound separately.

IMPORTANT – PLEASE READ

Corrosion-Resistant Treatment

Dear Toyota Customer:

We appreciate your time and patience while we applied the Corrosion-Resistant Treatment to your Tacoma's frame. We apologize for any inconvenience you may have experienced.

The Corrosion-Resistant Treatment has been applied to both the internal and external surfaces of your vehicle's frame. Please note the following:

External Surface Corrosion-Resistant Treatment
The temperature of the frame will affect the drying time. Please do not touch the external surfaces of the frame as the treated surfaces may remain tacky to the touch for a period of time. You may also note a petroleum product based odor, therefore, you may wish to park your vehicle outside for two or three days.

Internal Surface Corrosion-Resistant Treatment
The internal surface treatment consists of mainly paraffin wax. You may notice a small amount of whitish-colored droplets from the internal application. If dripping occurs on concrete:

1. Wipe up the spot as soon as possible with a paper towel.
2. Apply Simple Green® to any remaining wax.
3. Agitate the wax spot with a stiff scrub brush.
4. Wipe up the Simple Green®.
5. If the spot is still visible after 24 hours, repeat steps 1-4.

Some spots may require multiple treatments to no longer be visible.

Wash your hands immediately if you come into direct contact with either treatment material.

Thank you for driving a Toyota.

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

LSC 90D – 2001-2004 MODEL YEAR TACOMA FRAME PERFORATION INSPECTION AND OPERATION FLOWCHART

Before raising the vehicle on an alignment rack (or lift), visually inspect the **entire** frame assembly (top, side and bottom surfaces of the frame rails) for visible signs of perforation.

* Visually inspect the frame assembly for rust/corrosion, and follow the steps provided.

* **CAUTION:** Use protective eyewear and gloves when performing the under vehicle inspection as rusted metal may flake off.

Is perforation present?

NO

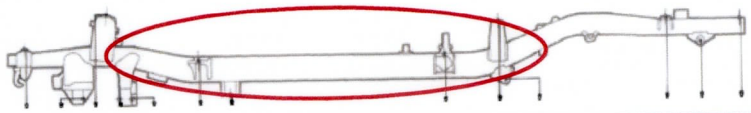
Perforation is NOT visible, and there is NO rust corrosion present on **any** portion of the frame.

Perforation is NOT visible, and rust corrosion is present on the frame.

YES

Perforation is visible on the frame.

1. Raise the vehicle on an alignment (drive-on) rack.
2. Using a 12 to 16 oz. (340 to 450 gr.) hammer, strike the side (inboard and outboard) and bottom surfaces of the frame rails using a 10 – 12 inch swing with light to moderate force.
3. Repeat this process at points every 2" along the frame rails ensuring that the entire area especially within the circle shown below is checked.



Does perforation of the metal occur at <u>ANY</u> of the points checked?

YES

NO

Is the vehicle registered in *CT, DC, DE, IL, IN, KY, MA, MD, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, or WV?*

Campaign completed, return the vehicle to the customer.

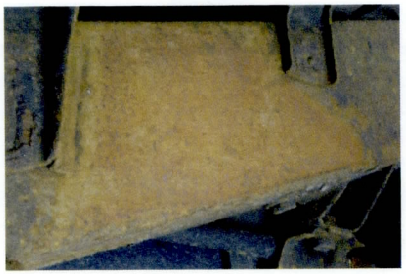
YES

YES

Remove the rust corrosion flakes, etc. from the vehicle's frame.

BEFORE

AFTER



Thoroughly clean the vehicle's frame.

- First apply NOX-RUST® 712AM to the inside of the frame.
- Second apply NOX-RUST® X-128T to the outside surface of the frame. Allow time for the chemicals to dry.

Warning: Make sure the temperature of the vehicle components do not exceed the flashpoint of the chemicals. (See MSDS located in the appendix of the TI)

Replace the frame.

WORK PROCEDURE CHECKLIST

WORK AREA

- ☐ Did you inspect the fire resistant coverings on the lift's swing arms for damage (cuts, tears, etc.) and replace as needed?
- ☐ Did you inspect the fire resistant covering on the floor for damage (cuts, tears, etc.) and replace as needed?
- ☐ Did you make sure the fire resistant covering on the floor was secure and does not create a slipping hazard?
- ☐ Did you inspect the partition(s) for damage (cuts, tears, etc.) and replace/repair as needed?

SPRAY GUN STORAGE

- ☐ Did you remove the air hose from the spray gun?
- ☐ Did you loosen the spray gun from the canister to release the air pressure, and retighten the spray gun to the canister once the air pressure has been released.?
- ☐ Did you cap the 712AM nozzle with the originally equipped nozzle cap and wrap the X128T nozzle with a plastic sheet secured by a rubber band?

VEHICLE PREPARATION & FRAME CORROSION-RESISTANCE TREATMENT

- ☐ Did you check to make sure that the frame's drain holes are not covered by the lift's swing arms?
- ☐ Did you cover the identifying labels (i.e. VIN label, etc.) on the frame with tape?
- ☐ Did you plug the 20 mm x 20 mm square opening and the two 6 mm drain holes located on the left and right sides of the frame with shop cloths/paper towels?
- ☐ Did you wipe off any NOX-RUST® 712AM that may be on the external frame surfaces? If this is not done the X-128T may have difficulty adhering to these areas.
- ☐ Did you apply the NOX-RUST® X-128T external frame treatment to sections of the frame that were covered by the lift points?
- ☐ Did you remove the shop cloths/paper towels from the 20 mm x 20 mm square opening and the two 6 mm drain holes located on the left and right sides of the frame?
- ☐ Did you remove the tape covering the identifying labels (i.e. VIN label, etc.) on the frame?

- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec) to seal internal surfaces.

- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

- Apply the 712AM while turning the nozzle in a circular motion.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

- Apply the 712AM while turning the nozzle in a circular motion.
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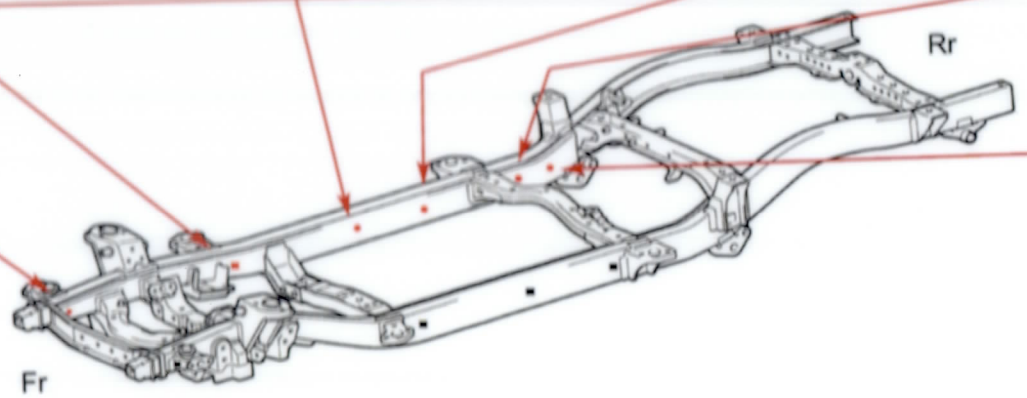
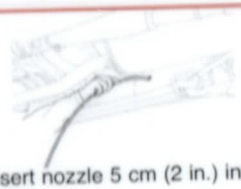
- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec)





- Insert nozzle 5 cm (2 in.) into the frame.
- Apply the 712AM while turning the nozzle in a circular motion.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)
- Please note this area maybe very tight.

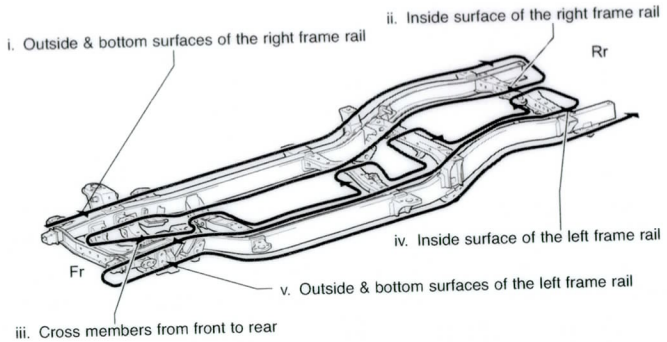
NOX-RUST® X-128T EXTERNAL FRAME APPLICATION SPEED

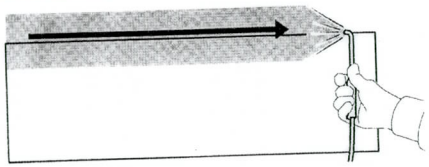
NOTE:

Make sure to wear protective eyewear, chemical resistant gloves and refer to the MSDS located in the appendix of the TI when performing this procedure.

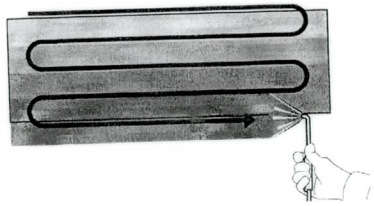
Before beginning, please review the flow/order of the applications of the X-128T corrosion preventive compound (sealant) to the external frame, as shown in the illustration and as listed below. Follow the application speed directions to apply the sealant to the exterior of the frame rail.

i. Outside & bottom surfaces of the right frame rail (starting at the front of the vehicle)
ii. Inside surface of the right frame rail (starting with the rear of the vehicle)
iii. Cross members from front to rear (starting from the front of the vehicle)
iv. Inside surface of the left frame rail (starting with the rear of the vehicle)
v. Outside & bottom surfaces of the left frame rail (starting at the front of the vehicle)

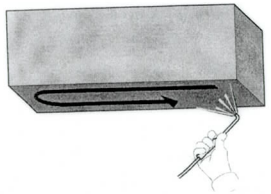




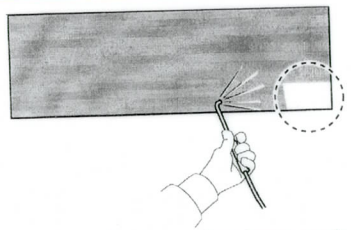
1. Starting in the top left corner of the section you are spraying, position the spray nozzle 20 to 25 cm (8 to10 in.) away from the frame surface.
2. Apply the X-128T to the outside frame rail at a constant speed of 0.1 m/sec (4 in/sec).



3. Without stopping, move down, reverse direction as shown in the illustration until the section is completed. Slightly overlap each pass by 0.5 in. so no gaps appear.



4. Once the outside surface of the frame rail section you are working on has been completed, without stopping, spray the bottom side as shown.
5. Spray the remaining frame and cross member surfaces in the same manner.



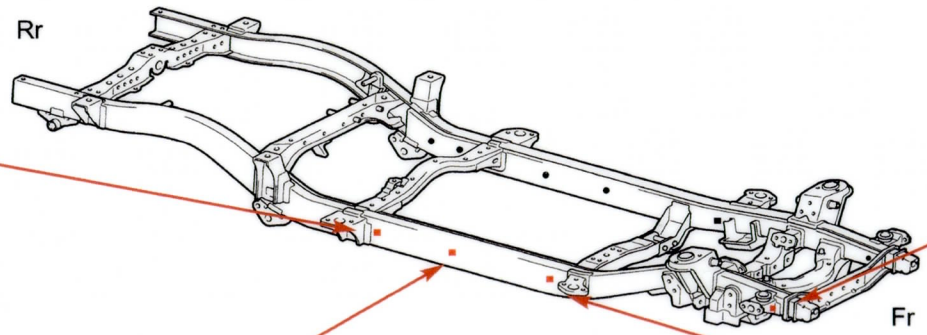
6. After the entire frame has been sealed, inspect and spray any areas that may have been missed.

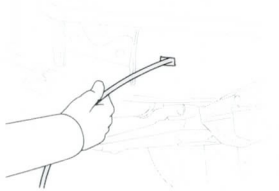
NOTE: After the vehicle has been removed from the lift, clean and spray the lift points.

OUTSIDE FRAME RAIL NOZZLE INSERTION POINT & DEPTH, & NOX-RUST® 712AM INTERNAL FRAME APPLICATION SPEED

NOTE:

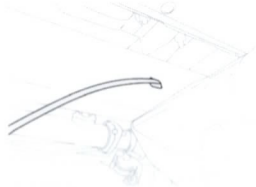
- Follow all MSDS guidelines for the 712AM corrosion preventive compound (sealant) which can be found in the technical instructions (TI).
- Only the outside frame rail nozzle insertion points are shown, see below for inside frame rail nozzle insertion locations.
- The exact insertion point locations may vary depending on the cab configuration.
- Follow the application speed directions to apply the sealant inside of the frame rail.
- Make sure to wear protective eyewear, chemical resistant gloves and refer to the MSDS located in the appendix of the TI when performing this procedure.
- Only one side is shown. Outside frame rail nozzle locations are the same on both sides.
- Make sure to repeat the 712AM application on the opposite frame rail so that both frame rails are sealed.
- Tape can be placed on the spray nozzle to reference insertion depth.





- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)



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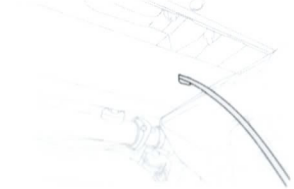
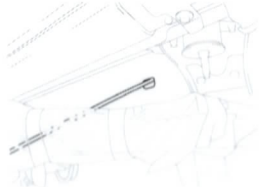
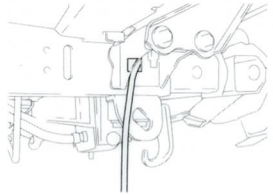


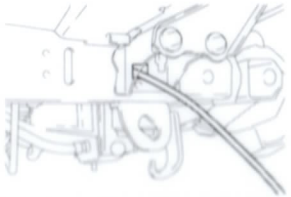
- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)



- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec)



- Insert nozzle 5 cm (2 in.) towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec)

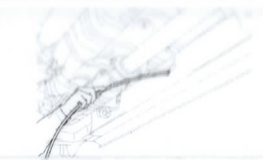


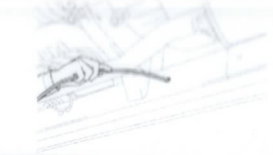
- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec)

INSIDE FRAME RAIL NOZZLE INSERTION POINT & DEPTH, & NOX-RUST® 712AM INTERNAL FRAME APPLICATION SPEED

NOTE:

- Follow all MSDS guidelines for the 712AM which can be found in the technical instructions.
- Only the inside frame rail nozzle insertion points are shown, see the previous section for outside frame rail nozzle insertion locations.
- The exact insertion point locations may vary depending on the cab configuration.
- Only one side is shown. Inside frame rail nozzle locations are the same on both sides.
- Make sure to wear protective eyewear, chemical resistant gloves and refer to the MSDS located in the appendix of the TI when performing this procedure.
- Make sure to repeat the 712AM application on the opposite frame rail so both frame rails have sealant applied.
- Tape can be placed on the spray nozzle to reference insertion depth.





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TOYOTA

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

DATE: 2009

RE: Information Packet for LSC 90D

LSC 90D - LIMITED SERVICE CAMPAIGN FOR 2001 - 2004 MODEL YEAR TACOMAS

CONNECTICUT DEALER INFORMATION PACKET

In December 2008, Toyota announced a Customer Support Program (CSP) for certain '01-'04 Model Year (MY) Tacomas. In conjunction with the CSP, a Limited Service Campaign (LSC) 90D is being launched to apply anti-corrosion (protective sealant) materials to vehicles registered in the Severe Cold Climate States.

This Packet contains information to help you prepare to apply these materials to affected Tacomas. The LSC anti-corrosion materials contain Volatile Organic Compounds (VOCs) and other substances that are subject to federal, state and/or local laws related to ***air emissions, fire code approval, waste generation and recordkeeping***. 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 LSC.

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

1. *"Getting Started Guide"*: ***Gets you started by reviewing the steps your dealership should take to comply with federal, state and local laws.***
2. *"Federal, State and Local Requirements Guide"*: ***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.***

Assumptions for this Packet: Your dealership (1) does not have an onsite or offsite auto body shop that uses more that 1,500 gallons of coatings, paints and solvents on a 12-month rolling average basis; and (2) will conduct the LSC in the vehicle service area. If either assumption is incorrect, or if you need more information or support, please **go to the C.L.E.A.N. Dealer website at http://cleandealer.com and select the LSC-90D link. You may also call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.**

IMPORTANT – PLEASE READ

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HOW TO IMPLEMENT THE LSC

Does your dealership already have an air permit?

Yes → For more information and support, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

No ↓

Step 1: ***Limit VOC-Containing Material Purchases To Stay Exempt From Air Permitting.***

To stay exempt from air permitting, **you must NOT USE more than 2,000 gallons of VOC-containing coatings, paints and solvents on a 12-month rolling average basis across your entire dealership** (purchases of X128T and 712AM materials count towards this limit).

Given typical response rate and number of affected vehicles per dealership, you should be able to easily complete the LSC and use only a portion of the 2,000 gallon limit.

Can you comply with the 2,000 gallon limit?

No → Please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) to determine your compliance options.

Yes ↓

Step 2: ***Contact Your Local Fire Official To Obtain A Fire Code Permit (Or Confirm That You Do Not Need One) And Confirm Your Compliance With Building And Zoning Code Requirements. (NOTE: DO NOT CONTACT LOCAL FIRE OFFICIAL UNTIL SUPPLEMENTAL FIRE CODE INFORMATION PACKET IS PROVIDED TO YOU.)***

See Fire, Building and Zoning Codes Section of **Federal, State and Local Requirements Guide** for compliance and contact information.

AFTER COMPLETING STEPS 1-2 *YOU ARE READY TO APPLY THE LSC MATERIALS*

But, you must complete the **LSC 90D Readiness Survey (to receive the spray equipment)**, follow the **Technical Instructions**, and Step 3 below.

COMPLETE THE LSC 90D READINESS SURVEY

Please complete the **LSC 90D Readiness Survey** available at the C.L.E.A.N. Dealer website (http://cleandealer.com) to confirm your readiness to start the LSC. ***Toyota will automatically ship the LSC Spray Guns*** to you at no charge once the survey reflects you have completed all LSC preparation steps.

Step 3: ***Keep Air Permitting Exemption Records.***

Use forms in Air Recordkeeping Section of **Federal, State and Local Requirements Guide**.

IMPORTANT – PLEASE READ

LSC 90D - LIMITED SERVICE CAMPAIGN FOR 2001 - 2004 MODEL YEAR TACOMAS

CONNECTICUT DEALER INFORMATION PACKET

GETTING STARTED GUIDE

Where Will You Conduct The LSC? *This Guide assumes your dealership:*

(1) will conduct the Limited Service Campaign (LSC) in its vehicle service area and (2) does not have an onsite or an offsite body shop that uses more than 1,500 gallons of coatings/paints/solvents on a 12-month rolling average basis.

If either assumption is incorrect, or if you plan to conduct the LSC in another area or state, please ***go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).***

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

- BEFORE beginning the LSC (see **Steps 1 and 2** below); and
- WHILE conducting the LSC (see **Step 3** below).

STEP 1 – BEFORE YOU BEGIN THE LSC, CONFIRM YOUR DEALERSHIP CAN STAY EXEMPT FROM AIR PERMITTING REQUIREMENTS

Do You Already Have An Air Permit? *If your dealership already has an air permit, then you may need a permit modification before beginning the LSC. Please discontinue reading this Guide and* **go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information and support.**

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

We assume that your dealership is currently exempt from air permitting requirements. To conduct the LSC and stay exempt:

KEEP YOUR DEALERSHIP'S TOTAL USE OF VOC-CONTAINING COATINGS, PAINTS AND SOLVENTS BELOW 2,000 GALLONS ON A 12 MONTH ROLLING AVERAGE BASIS.

Both X128T and 712AM LSC anti-corrosion materials contain VOCs, and therefore both count towards this limit.

(Step 1 Cont'd on Next Page)

IMPORTANT – PLEASE READ

IMPORTANT – PLEASE READ

STEP 1 (CONT'D)

How Many Tacomas Could I Do And Keep Below 2,000 Gallons Per Year? *You will use 1.3 gallons of X128T and 712AM for each truck.*[1] *If your dealership purchases no other VOC-containing materials, you could do as many as 1,500 trucks per year – which is likely more trucks than would be part of the LSC at your dealership – and remain below the 2,000 gallon permitting exemption limit. Even if your dealership currently purchases noticeable quantities of VOC-containing materials (for example, quantities of up to 1,500 gallons per year), you should still be able to conduct the LSC and remain exempt from permitting based on the anticipated response rates.*

If you are uncertain about whether you can remain under the 2,000 gallon limit, please ***go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information and support.***

Does the 2,000 Gallons Per Year Apply To My Entire Dealership's Operations Or Only Where I Will Conduct The LSC? *YOUR ENTIRE DEALERSHIP must stay below 2,000 gallons per year. For example, if your dealership's physical plant is distributed across multiple buildings, the 2,000 gallon limit would apply to all VOC-containing materials used in any building or part of your dealership.*

How Can I Learn More? *Go to Air Regulations Section and Air Recordkeeping Section of* ***Federal, State and Local Requirements Guide*** *for compliance information and tools.*

(Go to next page for Step 2)

[1] Approximately 3 liters (0.79 gal) of the X128 material and 2 liters (0.52 gal) of the 712AM material will be applied per truck.

STEP 2 – BEFORE YOU BEGIN APPLYING LSC MATERIALS, YOU WILL NEED TO NOTIFY YOUR LOCAL FIRE OFFICIAL TO OBTAIN APPROVAL FOR LSC ACTIVITIES AND MAKE SURE THAT YOUR DEALERSHIP CAN CONDUCT THE LSC IN COMPLIANCE WITH FIRE, BUILDING AND ZONING CODES

The LSC materials are combustible and subject to requirements under state and local fire codes. Building and zoning codes also may apply. The Fire, Building and Zoning Codes Section of **Federal, State and Local Requirements Guide** reviews these important requirements, but in summary, **prior to starting the LSC, you must**:

1. ***CONTACT YOUR LOCAL FIRE OFFICIAL IN ORDER TO: (A) PROVIDE INFORMATION ABOUT THE LSC; AND (B) OBTAIN A PERMIT IF REQUIRED, OR CONFIRM, IN WRITING, THAT A PERMIT IS NOT REQUIRED.***

   What Do I Need To Give My Local Fire Official? *Information about the LSC and where your dealership will conduct it. TMS is currently working with the Connecticut State Fire Marshal to obtain a general approval for the LSC, which you will use to obtain approval from your local fire official.* ***To avoid confusion/delays, you should not contact your local fire official about the LSC until you receive further information from TMS providing the materials you need to submit.***

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

   How Do I Confirm Compliance With Building, Zoning and Fire Code Requirements? *By confirming some information about your dealership's operations. TMS will be providing additional information about these requirements when it sends you the State Fire Marshal's approval for the LSC.*

After We Complete Steps 1 and 2, Can We Start The LSC?

Yes, if you have completed the ***LSC 90D Readiness Survey*** *(available at the C.L.E.A.N. Dealer website – http://cleandealer.com) and received the LSC spray guns.*

BUT *make sure to follow both (1) the* ***Technical Instructions,*** *and (2) Step 3 (records for permit exemption and training). You should also review the* ***Federal, State and Local Requirements Guide*** *to better understand the legal requirements for steps 1, 2, and 3.*

(Go to next page for Step 3)

IMPORTANT – PLEASE READ

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STEP 3 – KEEP AIR PERMITTING EXEMPTION RECORDS

You must maintain records demonstrating compliance with the 2,000 gallon permit exemption limit discussed in Step 1. Go to the Air Recordkeeping Section of the **Federal, State and Local Requirements Guide** for instructions and recordkeeping forms.

* * * * *

COMPLIANCE NOTE REGARDING REGULATED WASTE: *The LSC spray guns do not need to be cleaned and therefore the LSC spray operations will not generate regulated hazardous waste. As a result, it should not impact your dealership's waste generator status (e.g., whether you are a Small Quantity Generator or a Conditionally Exempt Small Quantity Generator of regulated waste). However, this assumes that you reuse the tarps (floor coverings) and any materials used to set up the partitions for the LSC operations described in the* ***Technical Instructions.*** *If you dispose of the tarps and/or the partition materials you will generate a larger quantity of waste, which may impact your generator status. If you have any questions, please* ***go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).***

Additionally, should you have any excess quantities of the LSC materials and/or used rags used to clean up any LSC materials that need to be disposed, these should be handled in the same manner as other regulated hazardous waste at your dealership. See the Regulated Waste Management Section of the ***Federal State and Local Requirements Guide*** *for more information.*

* * * * *

The steps outlined above should help you ensure that your dealership conducts the LSC 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 LSC Dealer Information Packet – the **Federal, State and Local Requirements Guide** 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-LSC operations at your dealership. We assume that you already comply with these requirements.

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 your participation and cooperation in the 2001-2004 Tacoma LSC.

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

FEDERAL, STATE &
LOCAL REQUIREMENTS

TOYOTA

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

LSC 90D - LIMITED SERVICE CAMPAIGN FOR 2001 - 2004 MODEL YEAR TACOMAS

CONNECTICUT DEALER INFORMATION PACKET

FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE

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

For the Limited Service Campaign (LSC), your dealership will use separate Vaupel HSDR 3300 spray guns to apply two different anti-corrosion materials (protective sealants) known as "NOX-RUST® X128T" and "NOX-RUST® 712 AM", both of which are combustible and contain Volatile Organic Compounds (VOCs). The application of these materials will result in air emissions. As a result, your dealership will need to conduct the LSC in compliance with legal requirements for:

- Air Quality under Connecticut Department of Environmental Protection (CTDEP) regulations; and
- Spraying & Storage of Combustible Liquids under State and Local Building, Zoning and Fire Codes.

This **Guide** reviews these requirements and provides forms and other compliance materials. It has been organized with separate sections labeled by topic so that you can easily review the information now and also later find the information should questions arise. ***To assist with your review, important pages/documents have been marked with a red line on the edge of the page.***

1. "AIR REGULATIONS" SECTION

a. The Air Regulations Section reviews legal requirements applicable to air emissions from the LSC. This Section ***assumes*** your dealership currently has air emissions below air permitting levels, and therefore, is currently exempt from air permitting requirements. If this assumption is not correct, and your dealership already has an air permit, then please go to the C.L.E.A.N. Dealer website at http://cleandealer.com and select the

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LSC-90D link. You may also call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.

b. Your dealership can conduct the LSC and continue to stay exempt from air permitting by keeping its total use of VOC-containing coating, solvents, paints and other materials below 2,000 gallons on a 12 month rolling average basis. Both the X128T and 712AM LSC anti-corrosion materials contain VOCs, so purchases of both these materials must be included as part of the 2,000 gallon limit.

c. **You should review the *Air Regulations Section* carefully to make sure that your dealership can conduct the LSC and continue to stay exempt from air permitting**.

(1) As explained in that Section, you will use a combined total of 1.3 gallons of X128T and 712AM for each truck. If your dealership purchases no other VOC-containing materials, then it could do as many as 1,500 trucks per year -- which is more trucks than likely would be part of the LSC at your dealership -- and remain below the 2,000 gallon limit.

(2) Of course, your dealership probably now purchases some quantities of VOC-containing materials, and so the number of trucks that you could do under the LSC would reduce based on your current purchase level. But unless your dealership now purchases noticeable quantities (such as, for example, quantities of 1,600 gallons per year or more), then you should be able to conduct the LSC and remain exempt from permitting.

d. If you will not be able to stay exempt from air permitting, then please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for information and support.

2. "AIR RECORDKEEPING" SECTION

a. The Air Recordkeeping Section contains the form your dealership will need to track VOC-containing material usage. ***This form: (i) will help your dealership conduct the LSC and stay exempt from air permitting, and (ii) will serve as your compliance record. All compliance records must be maintained for 5 years from the commencement of the LSC.***

b. ***The form in the Air Recordkeeping Section is accompanied by detailed instructions on how to fill it out.***

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

a. The Fire, Building, and Zoning Codes Section reviews the applicable state and local fire, building, and zoning codes. Review this Section carefully to ensure that your dealership can conduct the LSC in compliance with these codes.

b. **IMPORTANT:** Prior to implementing the LSC, **your dealership will need to contact your local fire official in order to**:

(1) Provide information about the LSC; and

(2) Obtain a fire permit *or* confirm, in writing, that a permit is not required.

c. **To avoid confusion/delays, you should not contact your local fire official about the LSC until you receive further information from TMS providing the materials you need to submit.**

d. **Prior to conducting the LSC, your dealership will also need to confirm that it can conduct the LSC in compliance with other building and zoning codes requirements.** TMS will be providing additional information about these requirements when it sends you the State Fire Marshal's approval for the LSC.

4. **"REGULATED WASTE MANAGEMENT" SECTION**

a. The Regulated Waste Management Section reviews the requirements that apply to regulated hazardous wastes generated by your dealership generally. If you are already familiar with these requirements you can skip this section.

b. The LSC spray guns do not need to be cleaned and therefore the LSC spray operations should not generate additional regulated waste. However, this assumes that you reuse the tarps (floor coverings) and any materials used to set up the partitions for the LSC operations described in the **Technical Instructions.** If you dispose of the tarps and/or partition materials you will generate a larger quantity of waste, which may impact your generator status.

c. Additionally, because the LSC materials are combustible, the EPA and CTDEP consider them "hazardous" if they are disposed of as waste.

Therefore, if your dealership has any excess LSC materials or other materials used to clean up the LSC materials (e.g., rags), then those materials should be handled in a similar manner to other regulated wastes generated at your dealership.

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

* * * * *

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-LSC 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).

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LSC 90D – LIMITED SERVICE CAMPAIGN FOR
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CONNECTICUT DEALER INFORMATION PACKET
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AIR REGULATIONS SECTION

***Do You Already Have An Air Permit?**: If Yes, then you may need a permit modification before conducting the LSC. For more information and dealer support, go to the C.L.E.A.N. Dealer website at http://cleandealer.com and select the LSC-90D link. You may also call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.*

I. AIR PERMITTING REQUIREMENTS: ARE YOU EXEMPT?

The LSC activities result in emissions of Volatile Organic Compounds (VOCs) and Particulate Matter (PM). Federal and state laws allow emissions of these substances up to certain levels and require a facility wishing to exceed those levels to 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.*

We assume that your dealership is currently exempt from air permitting requirements. Your dealership should be able to conduct the LSC and stay exempt from air permitting requirements **IF** you satisfy criteria A, B **AND** C on Page 2.

If you do not think your dealership can comply with the requirements below, or for more information and support, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

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YOUR DEALERSHIP WILL BE EXEMPT FROM AIR PERMITTING IF:

A. LIMIT TOTAL USAGE OF VOC-CONTAINING COATINGS, PAINTS AND SOLVENTS (INCLUDING BOTH THE X128T AND 712 AM LSC MATERIALS) TO LESS THAN 2,000 GALLONS ON A 12 MONTH ROLLING AVERAGE BASIS.

B. CONDUCT THE LSC IN AN EXISTING SERVICE AREA.

Do I Have To Conduct The LSC In An Existing Service Area? *No, but if you plan to conduct the LSC in another area (such as an offsite body shop) or in another state, then you may not be exempt from air permitting and/or you may be subject to different requirements. For more information and support, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).*

C. DO NOT OPERATE AN ONSITE OR OFFSITE BODY SHOP.

Why Does It Matter If I Have A Body Shop? *You must take into account VOC-containing materials purchases across your entire dealership in determining whether you can meet the 2,000 gallons per year limit. Because a body shop likely uses more VOC-containing materials than a regular service area, you may not be able to conduct the LSC and keep annual purchases below 2,000 gallons.*

If your dealership has an onsite body shop, the 2,000 gallon limit will apply to the VOC-containing material usage in the body shop and in other portions of the dealership. Moreover, the state might even require you to apply the 2,000 gallon limit to operations at the dealership and an offsite body shop -- even if the body shop is not where you will conduct the LSC -- if that body shop has a sufficient interconnection to the rest of the activities at your dealership.

If your dealership has an onsite or offsite body shop and cannot comply with the 2,000 gallon limit, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for more information and support.

How Can I Learn More About How These Air Permitting Exemption Requirements Will Apply To My Dealership? *Review the discussion in Parts II through IV below to ensure that you understand the basis for these requirements and how they will apply to your dealership.*

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

1. Volatile Organic Compounds (VOCs)

a. Potential To Emit: Stay Below 25 Tons Per Year If You Are Located In Cos Cob, Danbury, Stamford or Westport, and 50 Tons Per Year Elsewhere In The State.

(1) **Potential** VOC emissions from all activities (both LSC and non-LSC) at your dealership must be less than **25 tons per year** (tpy) if your dealership is located **in Cos Cob, Danbury, Stamford or Westport** and **50 tpy elsewhere** in the state in order for your dealership to be exempt from air permitting requirements

(2) Your dealership can conduct the LSC and stay exempt from air permitting by keeping its total usage of VOC-containing coating, solvents, paints and other materials below 2,000 gallons on a 12 month rolling average basis. This purchase level has the effect of capping potential VOC emissions from your dealership at 25 tpy (below both limits above).

(a) Both of the LSC anti-corrosion materials contain VOCs, and therefore both the X128T and the 712AM count against the 2,000 gallon limit.

(b) If your dealership purchases no other VOC-containing materials, then it could do as many as 1,500 trucks per year – which is more trucks than likely would be part of the LSC at your dealership – and remain below the 2,000 gallon permitting exemption limit.

(c) NOTE: Your dealership probably now purchases some quantities of VOC-containing materials, and so the number of trucks that you could do under the LSC would be fewer than 1,500 trucks per year based on your current purchase level. But unless your dealership now purchases significant quantities (for example, quantities of 1,600 gallons per year or more), then you should be able to conduct the LSC and remain exempt from air permitting.

(3) To track the total quantity of VOC-containing material purchased by your dealership, use the Log in the Air Recordkeeping Section of this **Guide.** Refer to discussion of this Log in Part III below.

2. **Particulate Matter (PM) Emissions: Stay below 0.21 pounds per hour**

a. **Potential** PM emissions from all activities (both LSC and non-LSC) at your dealership must be less than 100 tpy to stay exempt from air permitting. The LSC has low potential PM emissions, and the potential PM emissions from other activities at your dealership would likewise be expected to fall well below 100 tpy.

b. **In addition to the 100 tpy air permitting level for all activities, PM emissions from an individual "process" must not exceed an "Allowable PM Emissions Rate" in order to qualify for any permitting exemptions.**

(1) **In the case of the LSC, the Allowable PM Emissions Rate is 0.21 pounds per hour. As long as your dealership conducts the LSC in accordance with the Technical Instructions, the LSC should have potential PM emissions of 0.16 pounds per hour, which falls below the Allowable PM Emissions Rate.**

(2) Connecticut regulations do not require you to maintain PM emissions records; however, if questions arise regarding PM emissions from the LSC, you can refer to the information in footnote 2 below as your record of how the Allowable PM Emissions Rate calculation was performed for the LSC.[2]

---

[2] This Rate is calculated for each individual process based on a formula that requires determining the natural logarithm of the Process Weight Rate for the individual process, multiplying it by 0.62, and adding the result to the natural logarithm of 3.59 in order to determine the natural logarithm of the Rate. See CONN. AGENCIES REGS § 22a-174-18(f)(3).

"Process weight" means the total weight, in pounds, of all materials introduced into any specific process that may cause the emission of particulate matter and should be expressed in tons per hour (tph). For batch processes, like the LSC, it is calculated by dividing the total weight of materials introduced into one batch of a process divided by the time it takes to complete the batch (completion time excludes the time the PM emitting equipment is idle). The LSC's process weight rate is 0.01 tph. The formula for calculating the Allowable PM Emission Rate requires taking the natural logarithm of the LSC's Process Weight Rate (0.01 tph), multiplying it by 0.62, and adding the result to the natural logarithm of 3.59, which yields the Allowable Emissions Rate reported above.

III. AIR PERMITTING REQUIREMENTS: YOUR RECORDKEEPING OBLIGATIONS

Your dealership must maintain certain records for FIVE years from the commencement of the LSC to demonstrate that you are exempt from air permitting.

A. VOC Emissions Records

1. Your dealership must maintain records demonstrating that total usage less than 2,000 gallons on a 12 month rolling average basis of VOC-containing coatings, paints, solvents, X128T LSC material, and 712AM LSC material.

2. In the Air Recordkeeping Section of this Guide, you will find a "VOC–Containing Materials Usage Log", along with instructions for completing the log. The log is your tool for tracking total VOC-containing material purchases on a monthly and annual basis, and it will serve as your air permitting exemption compliance record.

3. You are also required to retain receipts supporting the quantities of VOC-containing materials reported in the "VOC-Containing Materials Usage Log." We assume that your dealership's existing inventory tracking system generates such records.

B. Other Records

1. In addition to the records above, the Air Recordkeeping Section also contains information you can use in the event any questions are raised with respect to the LSC. You should keep these records in your files:

   a. LSC Equipment Manufacturer's Specifications; and

   b. LSC Equipment Manufacturer's Guarantee of Spray Gun Transfer Efficiency of at Least 65%; and

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

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LSC 90D - LIMITED SERVICE CAMPAIGN FOR
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CONNECTICUT DEALER INFORMATION PACKET
FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE
AIR RECORDKEEPING SECTION

IMPORTANT: ***Please maintain these documents in your dealership's records for a period of 5 years from the commencement of the LSC.***

Your dealership must maintain the documents and records listed below to comply with applicable record retention and availability requirements (CONN. AGENCIES REGS § 22a-174-3c(c)), which requires the owner or operator of an exempt air contaminant source or device to maintain the following records for five years:

1. Annual VOC-Containing Material Usage Records (use attached "VOC-Containing Materials Usage Log"); and
2. Receipts for All VOC-Containing Coating and Solvent Purchases (this requirement should be satisfied by your existing inventory tracking procedures).

Other Records:
The following records should be kept in your files, in case any questions are raised regarding the LSC or the LSC's equipment and materials:

1. LSC Equipment Manufacturer's Specifications; and
2. LSC Equipment Manufacturer's Guarantee of Spray Gun Transfer Efficiency of at Least 65%; and
3. Material Safety Data Sheets (MSDSs) for the LSC materials. (NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements.)

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Instructions for Completing Materials Usage Log

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

Step 1:
Keep copies of receipts for all VOC-containing materials purchased by your dealership.

Step 2:
On a monthly basis, enter the total quantity (in gallons) of **X128T** and **712AM** LSC material purchased by your dealership in Column 1.

Step 3:
On a monthly basis, enter the total quantity (in gallons) of **all other** VOC-containing paints, coatings, solvents, and materials purchased by your entire dealership in Column 2.

Total VOC-Containing Materials, Paintings, Coatings and Solvents			
	Column 1 Enter total quantity of LSC X128T and 712AM material (gal). Each 5 liter LSC kit = 1.33 gallons.	Column 2 Enter total quantity of all other VOC-containing materials (gal).	Column 3 Add Column 1 to Column 2, and enter the results below (gal).
January	*20*	*50*	*70*
February	*40*	*42*	*82*
March	*32*	*65*	*97*
April	*28*	*65*	*93*
May	*55*	*20*	*75*
June	*50*	*45*	*95*
July	*45*	*45*	*90*
August	*40*	*52*	*92*
September	*35*	*35*	*70*
October	*40*	*35*	*75*
November	*42*	*20*	*62*
December	*50*	*35*	*85*
			986 (Enter sum of Column 3)

Step 4:
Add amounts in Columns 1 and 2 and enter the total each month in Column 3.

Step 5:
At year end, sum all of the entries in Column 3 and enter the total in the blank below the column. **If this number is greater than 2,000 over any 12 month period, please contact the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.**

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VOC-Containing Materials Usage Log

Reporting Year: _____ Dealership name and location: _____

Instructions: This dealership uses this log to demonstrate that its total usage of volatile organic compound (VOC)-containing materials or solvents is **BELOW 2,000 GALLONS ON A 12 MONTH ROLLING BASIS**. To meet this limit, this dealership does not use:

- **More than 2,000 gallons on a 12 month rolling basis** of the LSC exterior material (X128T), LSC interior material (712AM), paints, solvents, coatings, or any other material that is known to contain VOCs (2,000 gallons on a 12 month rolling basis = an average of 166 gallons per month).

If this dealership's annual purchases exceed this limit, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) promptly.

	Total VOC-Containing Materials, Paintings, Coatings and Solvents		
	Column 1 Enter total quantity of LSC X128T and LSC 712AM material (gal). Each 5 liter LSC kit = 1.33 gallons.	Column 2 Enter total quantity of all other VOC-containing materials (gal).	Column 3 Add Column 1 to Column 2, and enter the results below (gal).
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
			_____ (Enter sum of Column 3)

This record must be maintained for 5 years.
Duplicate as Necessary

DC\1181226.7

IMPORTANT DOCUMENT

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OPERATING INSTRUCTIONS

CAVITY PRESSURE CONTAINER GUN 3300 HSDR

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

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

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

Device Characteristics

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

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

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

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

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

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

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

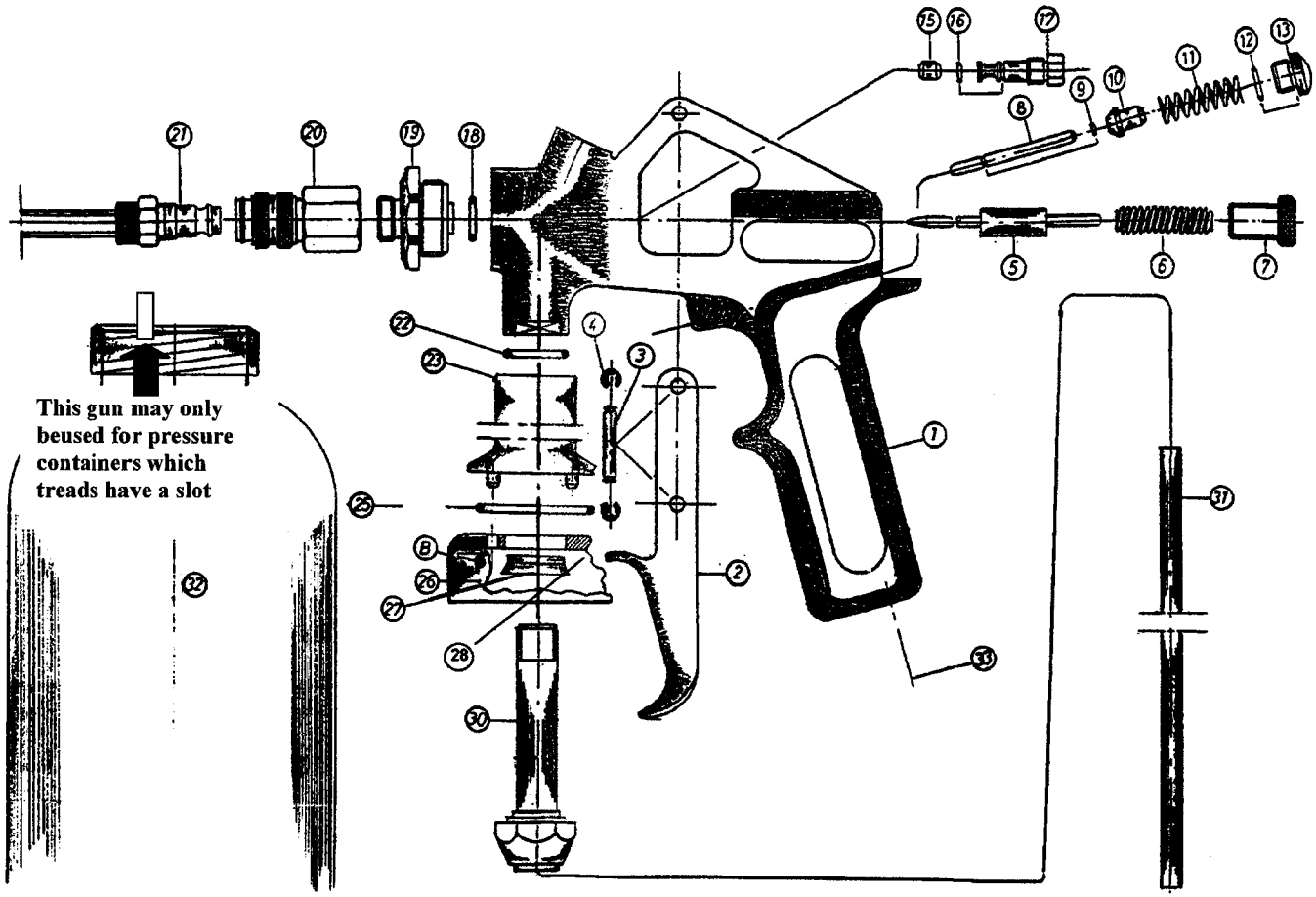
Faults
- Valve bolt **(8)** is stuck or does not close:
  Put oil on the valve bolt or into the air intake port of the gun. Depress the trigger **(2)** several times.
- Gun does not spray properly:
  Spray nozzle **(19)**, ascending tube **(31)**, cavity spray tube round spray or angle nozzle or gun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

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

Druckbehälterpistole
pressure container gun

3300 HSDR

1	10 2919 001	gun body
2	50 3909 005	trigger
3	30 1102 006	trigger axle
4	60 3100 029	clamping ring
5	S 83010	nozzle needle, cpl.
6	60 3104 007	spring f. nozzle needle
7	30 1122 005	stop screw
8	30 1104 008	valve bolt
9	60 4100 027	o-ring 1.5x0.75
10	40 4101 011	valve seal
11	60 3103 003	spring f. valve
12	60 4100 062	o-ring 8x1
13	30 1120 002	locking screw
14	----------	
15	40 4100 003	needle seal, teflon
16	60 4100 064	o-ring 5x1
17	30 1422 016	needle stuffing box
18	60 4100 066	o-ring 8x2.5
19	30 2122 005	spray nozzle
20	20 1413 001	quick coupling
21		Capity hose spray-set
22	60 4100 071	o-ring 15x2
23	40 4104 014	adaptor 3000
25	60 4100 072	o-ring 33x2
26	10 2111 014	pressure tank filler cap
27	60 4100 044	V-packing
28	60 4100 087	o-ring 35x4
29	----------	
30	S 83302	assembly screw
31	60 3129 014	ascending tube
32	S 83305	pressure tank
	S 83303	seal-set
	S 80151	flat-nozzle – plug cconnection



Parker Industries, Inc
16-8,Nihonbashi 2-chome, Chuo-ku, Tokyo, JAPAN 146-0081
Tel: 03-5205-1971 , Fax: 03-5205-1981

April 7, 2009

Toyota Motor Company
1 Toyota – Cho,
Toyota City, Aichi Prefecture 471-8571, Japan

This letter is to inform you that Parker Industries and Vaupel GmbH will certify that the HSDR 3300 pressure pot gun meets or exceeds the transfer efficiency of HVLP equipment for application of anti-corrosion materials to the interior of truck tubular frame rails.

Toyota Motor Sales, U.S.A. will use the Vaupel HSDR 3300 pressure pot gun to apply Nox-Rust® 712AM to the interior of truck tubular frame rails. The California South Coast Air Quality Management District reviewed information provided by Toyota Motor Sales, U.S.A. regarding the configuration of the truck frame rails and the Nox-Rust® 712AM. Based on this information, the South Coast Air Quality Management District concluded that the transfer efficiency achieved when coating the interior of the frame rails should approach 99%.

The Vaupel HSDR spray equipment provided for the application of Nox-Rust® 712AM exceeds the minimum transfer efficiency of 65% when applied to the interior of truck tubular frame rails.

Attached please find the South Coast Air Quality Management District approval letter dated March 10, 2009.

If you have any questions, please feel free to contact me.

Sincerely,

T. Masuda.

Takeshi Masuda
Director, Technical Div.
Parker Industries,INC.

Peter Riek
President
Vaupel GmbH

VAUPEL GmbH
Gerätebau
Metall-Kunststoff-Verarbeitung
Wellenbacher Weg 24
35216 Biedenkopf-Wallau

OC\1006538.1

DAUBERT
CHEMICAL COMPANY, INC.
4700 S. Central Ave., Chicago, IL 60638 • (708) 496-7350 • FAX (708) 496-7367

December 15, 2008

Toyota Motor Company
1 Toyota – Cho,
Toyota City, Aichi Prefecture 471-8571, Japan

This letter is to inform you that Daubert Chemical Company and Vaupel GmbH will certify that the 3300 HSDR pressure pot gun meets or exceeds the transfer efficiency of HVLP equipment.

The transfer efficiency of the 3300 HSDR spray gun and 90° hooked wand was evaluated using Daubert's Nox-Rust® X-128T rust preventative wax coating. Testing was performed at Daubert Chemical Company's lab at 4700 S. Central Avenue, Chicago, IL. The South Coast AQMD Spray Equipment Transfer Efficiency Testing Procedure for Equipment Users dated May 24, 1989 was the test protocol employed under the application conditions indicated.

The 3300HSDR spray equipment that we have provided you for the application of Nox Rust® X-128T exceed the minimum transfer efficiency of 65% when operated between 50 and 90 PSI.

Attached find the actual data and files associated with our testing.

If you have any questions please feel free to contact me.

Sincerely,

Frank P. Vella
Director, Industrial Coatings Sales
Daubert Chemical Company

Peter Riek
President
Vaupel GmbH

DATA SHEET 1
WEIGHTS OF SUBSTRATES BEFORE AND AFTER COATING

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Coating Used**

Manufacturer's Name: Daubert Chemical

Coating Name: Nox-Rust X-128T

Code No.: 1384000 R-688-12

WEIGHTS OF SUBSTRATES

Identification Mark or Tag on Substrate	Weight Before Coating (gm)		Weight After Coating & Drying (gm)	
	1st Weight	2nd Weight	1st Weight	2nd Weight
Panel #1	552.29	552.31	560.47	560.49
Panel #2	552.43	552.42	560.16	560.20
Panel #3	557.41	551.32	559.96	559.99
Panel #4	554.86	554.79	562.82	562.85
Total	**A** = 552.75	**B** = 552.71	**C** = 560.85	**D** = 560.88

Avg. total weight of substrates before coating (E): $\frac{A + B \text{ gm}}{2}$ = **E** = 552.73 gm

Avg. total weight of substrates after coatings (F): $\frac{C + D \text{ gm}}{2}$ = **F** = 560.87 gm

Weight of solids deposited on substrates (G): **F – E gm** = **G** = 8.15 gm

(RDD/DS5-89)

DATA SHEET 2
COATING SPECIFICATIONS
(SUPPLIED BY MANUFACTURER)

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Specifications of Coatings as Supplied:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

VOC

= 414.4 **gm/L (less water and exempt solvents)**

= 414.4 **gm/L (including water and exempt solvents)**

***Specifications of Reducer:**

Manufacturer's Name: None

Reducer Name: --

Code No.: --

VOC

= -- **gm/L (less water and exempt solvents)**

= -- **gm/L (including water and exempt solvents)**

***Mixing Ratio:**

Number of Volume Parts of Coating = N/A

Number of Volume Parts of Reducer = N/A

***Specification of Coating, As Applied:**

VOC

= 414.4 **gm/L (less water and exempt solvents)**

= 414.4 **gm/L (including water and exempt solvents)**

(RDD/DS5-89)

DATA SHEET 3
LABORATORY RESULTS

***Date of Test:** October 10, 2008

***Coating as Supplied:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

*** Reducer:**

Manufacturer's Name: None

Reducer Name: None

Code No.: None

***Mixing Ratio:**

Number of Volume Parts of Coating = 100%

Number of Volume Parts of Reducer = 0%

***Coating As Applied:**

VOC (ASTM D-3960) = 414.4 gm/L (less water and exempt solvents)

Weight Fraction Solids (ASTM D-2369-81) P = 53.1%

Density (ASTM – D-1475) = 0.882 gm/L

(RDD/DS5-89)

DATA SHEET 4
SPRAY EQUIPMENT SPECIFICATIONS AND OPERATING CONDITIONS

***Date of Test:** October 10, 2008

***Spray Equipment Specifications:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Equipment Name: Cavity pressure container gun

Model No.: 3300 HSDR

Cap Size: N/A - Hook type wand on hose

Orifice: Hook type wand (0.8 mm x 5 mm)

Needle: N/A

Type of Fluid Supply (Pressure-Pot or Cup): Pressure pot

Size of Pressure-Pot or Cup: 1 liter

***Operating Conditions:**

Fluid Pressure at Pressure-Pot, PSIG = 50 psi

Fluid Pressure at Gun Tip, PSIG = 50 psi

Air Supply Pressure, PSIG = 50 psi

Air Pressure at Gun Tip, PSIG = 50 psi

Approximate Distance Between the Gun and the Substrate, Inches = 6 inches

Air Flow Rate at Tip = N/A cfm

Air Temperature at Tip = 77 °F

Source of Air: Air compressor

***Viscosity:**

Viscosity (ASTM D-1200) = N/A seconds Ford Cup @ -- °F

Viscosity (ASTM D-3794), Part 6 = N/A seconds Zahn Cup @ -- °F (see below)

(RDD/DS5-89)

Brookfield RV, spindle #3 @ 10 rpm 4500 cps @ 77 °F

ML/10-08 @ 50 psi

DATA SHEET 5
AMOUNT OF COATINGS USED

***Date of Test:** October 10, 2008

***Coating Used:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) Before Coating:**

1st Weight (H) 2250.28 **gm**

2nd Weight (I) 2250.31 **gm**

***Average Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) Before Coating:**

$$J = \frac{H + I \text{ gm}}{2} \qquad \frac{2250.28 + 2250.31}{2}$$

= _____ **gm** 2250.30 grams

***Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) After Coating:**

1st Weight (K) = 2230.10 **gm**

2nd Weight (L) = 2330.21 **gm**

***Average Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) After Coating:**

$$M = \frac{K + L \text{ gm}}{2} \qquad \frac{2230.10 + 2230.21}{2}$$

= _____ **gm** 2230.16 grams

***Amount of Coating Used:**

N = **(J – M) gm** 2250.30 - 2230.16

= _____ **gm** 20.13 grams

(RDD/DS5-89)

DATA SHEET 6
COATING FILM THICKNESS

***Date of Test:** October 10, 2008

***Spray Equipment Used:** Vaupel GmbH &
Manufacturer's Name: Daubert Chemical
Type of Equipment: 1 liter pressure pot
Model No.: 3300 HSDR

***Coating Used**
Manufacturer's Name: Daubert Chemical
Coating Name: Nox-Rust X-128T
Code No.: 1384000 (R-688-12)

Predetermined Dry Film Thickness = 4 Mils to 6 Mils

Identification Mark or Tag on Substrate	Wet Film Thickness, Mils		Dry Film Thickness, Mils		Coating Finish: Acceptable or Unacceptable
	1st Reading	2nd Reading	1st Reading	2nd Reading	
Panel #1	8.8	9.2	4.1	4.3	Yes
Panel #2	8.2	7.7	3.8	3.6	Yes
Panel #3	9.2	9.7	4.3	4.5	Yes
Panel #4	8.8	9.2	4.1	4.3	Yes

(RDD/DS5-89)

DATA SHEET 7
TRANSFER EFFICIENCY CALCULATION

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Coating Used:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

VOC As Applied (From Data Sheet 3) = 414.4 **gm/L (Less Water and Exempt Solvents)**

Weight Fraction Solids (From Data Sheet 3) **P =** 53.1%

Weight of Coatings Used (From Data Sheet 5) **N =** 20.13 **gm**

Weight of Solids Sprayed **Q = (N)(P)gm =** 10.69 **gm**

Weight of Solids Deposited (From Data Sheet 1) **G =** 8.15 **gm**

Transfer Efficiency

$$= \frac{\text{Weight of Solids Deposited}}{\text{Weight of Solids Sprayed}} \times 100$$

$$= \frac{\frac{G\,x}{100}}{Q}$$

= 76.2%

(RDD/DS5-89)

DATA SHEET 1
WEIGHTS OF SUBSTRATES BEFORE AND AFTER COATING

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Coating Used**

Manufacturer's Name: Daubert Chemical

Coating Name: Nox-Rust X-128T

Code No.: 1384000 R-688-12

WEIGHTS OF SUBSTRATES

Identification Mark or Tag on Substrate	Weight Before Coating (gm)		Weight After Coating & Drying (gm)	
	1st Weight	2nd Weight	1st Weight	2nd Weight
Panel #5	553.82	553.70	564.70	564.78
Panel #6	560.71	560.71	571.31	571.39
Panel #7	557.18	557.22	566.26	566.30
Panel #8	557.42	557.38	566.93	566.99
Total	**A =** 557.28	**B =** 557.25	**C =** 567.30	**D =** 567.37

Avg. total weight of substrates before coating (E): $\frac{A + B \text{ gm}}{2}$ **= E =** 557.27 gm

Avg. total weight of substrates after coatings (F): $\frac{C + D \text{ gm}}{2}$ **= F =** 567.34 gm

Weight of solids deposited on substrates (G): **F – E gm = G =** 10.07 gm

(RDD/DS5-89)

DATA SHEET 2
COATING SPECIFICATIONS
(SUPPLIED BY MANUFACTURER)

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Specifications of Coatings as Supplied:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

VOC

= 414.4 **gm/L (less water and exempt solvents)**

= 414.4 **gm/L (including water and exempt solvents)**

***Specifications of Reducer:**

Manufacturer's Name: None

Reducer Name: --

Code No.: --

VOC

= -- **gm/L (less water and exempt solvents)**

= -- **gm/L (including water and exempt solvents)**

***Mixing Ratio:**

Number of Volume Parts of Coating = N/A

Number of Volume Parts of Reducer = N/A

***Specification of Coating, As Applied:**

VOC

= 414.4 **gm/L (less water and exempt solvents)**

= 414.4 **gm/L (including water and exempt solvents)**

(RDD/DS5-89)

DATA SHEET 3
LABORATORY RESULTS

***Date of Test:** October 10, 2008

***Coating as Supplied:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

*** Reducer:**

Manufacturer's Name: None

Reducer Name: None

Code No.: None

***Mixing Ratio:**

Number of Volume Parts of Coating = 100%

Number of Volume Parts of Reducer = 0%

***Coating As Applied:**

VOC (ASTM D-3960) = 414.4 gm/L (less water and exempt solvents)

Weight Fraction Solids (ASTM D-2369-81) P = 53.1%

Density (ASTM – D-1475) = 0.882 gm/L

(RDD/DS5-89)

DATA SHEET 4
SPRAY EQUIPMENT SPECIFICATIONS AND OPERATING CONDITIONS

***Date of Test:** October 10, 2008

***Spray Equipment Specifications:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Equipment Name: Cavity pressure container gun

Model No.: 3300 HSDR

Cap Size: N/A - Hook type wand on hose

Orifice: Hook type wand (0.8 mm x 5 mm)

Needle: N/A

Type of Fluid Supply (Pressure-Pot or Cup): Pressure pot

Size of Pressure-Pot or Cup: 1 liter

***Operating Conditions:**

Fluid Pressure at Pressure-Pot, PSIG = 70 psi

Fluid Pressure at Gun Tip, PSIG = 70 psi

Air Supply Pressure, PSIG = 70 psi

Air Pressure at Gun Tip, PSIG = 70 psi

Approximate Distance Between the Gun and the Substrate, Inches = 6 inches

Air Flow Rate at Tip = N/A cfm

Air Temperature at Tip = 77 °F

Source of Air: Air compressor

***Viscosity:**

Viscosity (ASTM D-1200) = N/A seconds Ford Cup @ -- °F

Viscosity (ASTM D-3794), Part 6 = N/A seconds Zahn Cup @ -- °F (see below)

(RDD/DS5-89)

Brookfield RV, spindle #3 @ 10 rpm 4500 cps @ 77 °F

ML/10-08 @ 70 psi

DATA SHEET 5
AMOUNT OF COATINGS USED

***Date of Test:** October 10, 2008

***Coating Used:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) Before Coating:**

1st Weight (H) 2211.63 **gm**

2nd Weight (I) 2211.71 **gm**

***Average Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) Before Coating:**

$$J = \frac{H + I \text{ gm}}{2} \qquad \frac{2211.63 + 2211.71}{2}$$

= _____ **gm** 2211.67 grams

***Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) After Coating:**

1st Weight (K) = 2187.45 **gm**

2nd Weight (L) = 2187.55 **gm**

***Average Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) After Coating:**

$$M = \frac{K + L \text{ gm}}{2} \qquad \frac{2187.45 + 2187.55}{2}$$

= _____ **gm** 2187.50 grams

***Amount of Coating Used:**

$$N = (J - M) \text{ gm} \qquad 2211.67 - 2187.50$$

= _____ **gm** 24.17 grams

(RDD/DS5-89)

DATA SHEET 6
COATING FILM THICKNESS

***Date of Test:** October 10, 2008

***Spray Equipment Used:** Vaupel GmbH &
Manufacturer's Name: Daubert Chemical
Type of Equipment: 1 liter pressure pot
Model No.: 3300 HSDR

***Coating Used**
Manufacturer's Name: Daubert Chemical
Coating Name: Nox-Rust X-128T
Code No.: 1384000 (R-688-12)

Predetermined Dry Film Thickness = 4 Mils to 6 Mils

Identification Mark or Tag on Substrate	Wet Film Thickness, Mils		Dry Film Thickness, Mils		Coating Finish: Acceptable or Unacceptable
	1st Reading	2nd Reading	1st Reading	2nd Reading	
Panel #5	12.0	12.0	5.5	5.8	Yes
Panel #6	11.0	11.0	5.2	5.0	Yes
Panel #7	9.0	9.0	4.2	4.4	Yes
Panel #8	10.0	10.0	4.6	4.5	Yes

(RDD/DS5-89)

DATA SHEET 7
TRANSFER EFFICIENCY CALCULATION

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Coating Used:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

VOC As Applied (From Data Sheet 3) = 414.4 **gm/L (Less Water and Exempt Solvents)**

Weight Fraction Solids (From Data Sheet 3) P = 53.1%

Weight of Coatings Used (From Data Sheet 5) N = 24.17 **gm**

Weight of Solids Sprayed Q = (N)(P)gm = 12.83 **gm**

Weight of Solids Deposited (From Data Sheet 1) G = 10.07 **gm**

Transfer Efficiency

$$= \frac{\text{Weight of Solids Deposited}}{\text{Weight of Solids Sprayed}} \times 100$$

$$= \frac{\frac{G \times}{100}}{Q}$$

= 78.5%

(RDD/DS5-89)

DATA SHEET 1
WEIGHTS OF SUBSTRATES BEFORE AND AFTER COATING

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Coating Used**

Manufacturer's Name: Daubert Chemical

Coating Name: Nox-Rust X-128T

Code No.: 1384000 R-688-12

WEIGHTS OF SUBSTRATES

Identification Mark or Tag on Substrate	Weight Before Coating (gm)		Weight After Coating & Drying (gm)	
	1st Weight	2nd Weight	1st Weight	2nd Weight
Panel #9	553.64	553.72	564.28	564.31
Panel #10	558.00	558.10	569.45	569.48
Panel #11	557.75	557.83	570.02	570.08
Panel #12	557.07	557.05	569.85	569.87
Total	**A =** 556.62	**B =** 556.68	**C =** 568.40	**D =** 568.44

Avg. total weight of substrates before coating (E): $\frac{A + B \text{ gm}}{2}$ **= E =** 556.65 gm

Avg. total weight of substrates after coatings (F): $\frac{C + D \text{ gm}}{2}$ **= F =** 568.42 gm

Weight of solids deposited on substrates (G): **F – E gm = G =** 11.77 gm

(RDD/DS5-89)

DATA SHEET 2
COATING SPECIFICATIONS
(SUPPLIED BY MANUFACTURER)

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Specifications of Coatings as Supplied:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

VOC = 414.4 **gm/L (less water and exempt solvents)**

= 414.4 **gm/L (including water and exempt solvents)**

***Specifications of Reducer:**

Manufacturer's Name: None

Reducer Name: --

Code No.: --

VOC = -- **gm/L (less water and exempt solvents)**

= -- **gm/L (including water and exempt solvents)**

***Mixing Ratio:**

Number of Volume Parts of Coating = N/A

Number of Volume Parts of Reducer = N/A

***Specification of Coating, As Applied:**

VOC = 414.4 **gm/L (less water and exempt solvents)**

= 414.4 **gm/L (including water and exempt solvents)**

(RDD/DS5-89)

DATA SHEET 3
LABORATORY RESULTS

***Date of Test:** October 10, 2008

***Coating as Supplied:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

*** Reducer:**

Manufacturer's Name: None

Reducer Name: None

Code No.: None

***Mixing Ratio:**

Number of Volume Parts of Coating = 100%

Number of Volume Parts of Reducer = 0%

***Coating As Applied:**

VOC (ASTM D-3960) = 414.4 gm/L (less water and exempt solvents)

Weight Fraction Solids (ASTM D-2369-81) P = 53.1%

Density (ASTM – D-1475) = 0.882 gm/L

(RDD/DS5-89)

DATA SHEET 4
SPRAY EQUIPMENT SPECIFICATIONS AND OPERATING CONDITIONS

***Date of Test:** October 10, 2008

***Spray Equipment Specifications:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Equipment Name: Cavity pressure container gun

Model No.: 3300 HSDR

Cap Size: N/A - Hook type wand on hose

Orifice: Hook type wand (0.8 mm x 5 mm)

Needle: N/A

Type of Fluid Supply (Pressure-Pot or Cup): Pressure pot

Size of Pressure-Pot or Cup: 1 liter

***Operating Conditions:**

Fluid Pressure at Pressure-Pot, PSIG = 90 psi

Fluid Pressure at Gun Tip, PSIG = 90 psi

Air Supply Pressure, PSIG = 90 psi

Air Pressure at Gun Tip, PSIG = 90 psi

Approximate Distance Between the Gun and the Substrate, Inches = 6 inches

Air Flow Rate at Tip = N/A cfm

Air Temperature at Tip = 77 °F

Source of Air: Air compressor

***Viscosity:**

Viscosity (ASTM D-1200) = N/A seconds Ford Cup @ -- °F

Viscosity (ASTM D-3794), Part 6 = N/A seconds Zahn Cup @ -- °F (see below)

(RDD/DS5-89)

Brookfield RV, spindle #3 @ 10 rpm 4500 cps @ 77 °F

DATA SHEET 5
AMOUNT OF COATINGS USED

***Date of Test:** October 10, 2008

***Coating Used:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) Before Coating:**

1st Weight (H) 2070.42 **gm**

2nd Weight (I) 2070.51 **gm**

***Average Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) Before Coating:**

$$J = \frac{H + I \text{ gm}}{2} \qquad \frac{2070.42 + 2070.51}{2}$$

= _____ **gm** 2070.47 grams

***Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) After Coating:**

1st Weight (K) = 2044.05 **gm**

2nd Weight (L) = 2044.12 **gm**

***Average Weight of Pressure-Pot/Cup, Gun and Paint Line (If Applicable) After Coating:**

$$M = \frac{K + L \text{ gm}}{2} \qquad \frac{2044.05 + 2044.12}{2}$$

= _____ **gm** 2044.09 grams

***Amount of Coating Used:**

$$N = (J - M) \text{ gm} \qquad 2070.47 - 2044.09$$

= _____ **gm** 26.39 grams

(RDD/DS5-89)

DATA SHEET 6
COATING FILM THICKNESS

***Date of Test:** October 10, 2008

***Spray Equipment Used:** Vaupel GmbH &
Manufacturer's Name: Daubert Chemical
Type of Equipment: 1 liter pressure pot
Model No.: 3300 HSDR

***Coating Used**
Manufacturer's Name: Daubert Chemical
Coating Name: Nox-Rust X-128T
Code No.: 1384000 (R-688-12)

Predetermined Dry Film Thickness = 4 Mils to 6 Mils

Identification Mark or Tag on Substrate	Wet Film Thickness, Mils		Dry Film Thickness, Mils		Coating Finish: Acceptable or Unacceptable
	1st Reading	2nd Reading	1st Reading	2nd Reading	
Panel #9	11.2	11.6	5.2	5.4	Yes
Panel #10	13.1	13.5	6.1	6.3	Yes
Panel #11	13.5	13.5	6.3	6.3	Yes
Panel #12	13.9	13.7	6.5	6.4	Yes

(RDD/DS5-89)

DATA SHEET 7
TRANSFER EFFICIENCY CALCULATION

***Date of Test:** October 10, 2008

***Spray Equipment Used:**

Manufacturer's Name: Vaupel GmbH & Daubert Chemical Company

Type of Equipment: 1 liter pressure pot

Model No.: 3300 HSDR

***Coating Used:**

Manufacturer's Name: Daubert Chemical Company

Coating Name: Nox-Rust X-128T

Code No.: Part #1384000 Batch #R-688-12

VOC As Applied (From Data Sheet 3) = 414.4 **gm/L (Less Water and Exempt Solvents)**

Weight Fraction Solids (From Data Sheet 3) **P =** 53.1%

Weight of Coatings Used (From Data Sheet 5) **N =** 26.42 **gm**

Weight of Solids Sprayed **Q = (N)(P)gm =** 14.02 **gm**

Weight of Solids Deposited (From Data Sheet 1) **G =** 11.77 **gm**

Transfer Efficiency

$$= \frac{\text{Weight of Solids Deposited}}{\text{Weight of Solids Sprayed}} \times 100 \qquad \frac{11.77}{14.02} \times 100$$

$$= \frac{\frac{G\,x}{100}}{Q}$$

= 83.9%

(RDD/DS5-89)

MATERIAL SAFETY DATA SHEET

DAUBERT CHEMICAL COMPANY

4700 SOUTH CENTRAL AVENUE
CHICAGO, ILLINOIS 60638
TELEPHONE: (708) 496-7350
FAX: (708) 496-7367

EMERGENCY CONTACT:
CHEMTREC (800) 424-9300

HMIS HAZARD RATING	
HEALTH	1
FIRE	2
REACTIVITY	0
PERSONAL PROTECTION	D

Date of Review:
Date of Preparation: August 1, 2008

Revised: December 4, 2008
By: M. Longo

SECTION 1: PRODUCT IDENTIFICATION

Product Name: **NOX-RUST® X128T**
Chemical Family: Petroleum Solvent/Additive Blend
Material Usage: Corrosion Preventive Compound

EMERGENCY OVERVIEW: Petroleum solvent-based product with solvent odor. Combustible liquid; when product burns it releases typical hydrocarbon products of combustion. Refer to Section 3 for health effects and to Section 5 for fire hazard data.

SECTION 2: HAZARDOUS INGREDIENTS

Component	Wt%	Recommended Exposure Limits (TWA)
Aliphatic Petroleum Solvent CAS #64742-88-7 and/or #64742-47-8 and/or #8052-41-3	40-50	OSHA PEL: 100 ppm ACGIH TLV: 100 ppm ACGIH STEL: 200 ppm
Petroleum Hydrocarbon (Petrolatum) CAS #8009-03-8	20-25	OSHA PEL: 2 mg/m^3 ACGIH TLV: 2 mg/m^3 (for fumes)
Petroleum Wax CAS #64742-42-3	6-10	OSHA PEL: Not Established ACGIH TLV: 2 mg/m^3(fumes)
[1]Calcium Carbonate CAS #1317-65-3 and/or CAS #471-34-1	2-4	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)
[1]Carbon Black CAS #1333-86-4	<1	OSHA:PEL: 3.5 mg/m^3 ([2]nuisance dust) ACGIH TLV: None Established

[1]See Section 3.
[2]This component poses a hazard only if the liquid dries and a dust is formed.

SECTION 3: HEALTH HAZARD INFORMATION

Primary Routes of Entry: Inhalation, skin absorption.
Acute Effects: Excessive inhalation may produce dizziness, nausea, headache, and incoordination. May cause severe eye irritation and reversible skin irritation. Prolonged skin exposure may cause dermatitis or oil acne. Breathing mists may cause dizziness or pulmonary irritation.
Carcinogenicity: Calcium carbonate, the product itself, is not listed by NTP, IARC, or OSHA as a carcinogen. There are 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.
Pre-Existing Medical Conditions Aggravated by Exposure: Exposure may aggravate pre-existing respiratory or skin problems.

SECTION 4: FIRST AID PROCEDURES

Inhalation: 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: 105°F. (TCC)
Explosive Limits: LEL: 0.6 UEL: 7.0

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: Flammable/combustible material; may be ignited by heat, sparks or flames. Vapors may travel to a source of ignition and flash back. Container may explode in heat of fire. Vapor explosion hazard indoors, outdoors or in sewers. Runoff to sewer may create fire or explosion hazard.
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, sparks or hot surfaces. Never use a torch to cut or weld on or near container. Empty containers can contain explosive vapors.
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:	Black
Appearance:	Viscous Liquid
Odor:	Petroleum Solvent
Boiling Point (initial):	>300°F
Evaporation Rate (n-Butyl Acetate= 1) :	<1
Vapor Pressure (mmHg @ 20°C):	3.4
Vapor Density (air= 1) :	>1
Solubility in Water:	Negligible
Specific Gravity:	0.88
pH:	Not Applicable
Percent Volatile by Volume:	53

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: (Calculated Values)

VOC per gallon:	3.5 lbs/gal
VOC per gallon minus exempt solvents and water:	3.5 lbs/gal
EPA Hazardous Waste Number(s) (40CFR Part 261):	D001
EPA Hazard Category (40CFR Part 370):	DELAYED (CHRONIC) FIRE HAZARD (COMBUSTIBLE)

SARA TITLE III

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

CHEMICAL	CAS NO.	WT %
NONE		

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

CHEMICAL	CAS NO.	WT %	RQ/TPQ Lbs
NONE			

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

CHEMICAL	CAS NO.	WT %	Final RQ Lbs
Aliphatic Petroleum Solvent	64742-88-7, 64742-47-8, 8052-41-3	40-50	100

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:

CHEMICAL	CAS NO.	Estimated Concentration %
Crystalline Silica *(Naturally occurring in mined calcium carbonate)*	14808-60-7	.03 max
Carbon Black	1333-86-4	<1

(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.)

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

MATERIAL SAFETY DATA SHEET

MANUFACTURED BY
PARKER INDUSTRIES

Nox-Rust® is a registered trademark of Daubert Chemical Company and is used pursuant to license.

DAUBERT CHEMICAL COMPANY
4700 SOUTH CENTRAL AVENUE
CHICAGO, ILLINOIS 60638
TELEPHONE: (708) 496-7350
FAX: (708) 496-7367

EMERGENCY CONTACT:
CHEMTREC (800) 424-9300

HMIS HAZARD RATING

HEALTH	1
FIRE	1
REACTIVITY	0
PERSONAL PROTECTION	B

Date of Review:	Revised: March 11, 2009
Date of Preparation: November 14, 2007	By: R. Lauterbach

SECTION 1: PRODUCT IDENTIFICATION

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

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

SECTION 2: HAZARDOUS INGREDIENTS

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

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

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

SECTION 3: HEALTH HAZARD INFORMATION

Primary Routes of Entry: Skin absorption, eyes (splashing).
Acute Effects: May cause eye irritation and reversible skin irritation. Prolonged skin exposure may cause dermatitis or oil acne. Breathing mists may cause dizziness or pulmonary irritation.
Chronic Overexposure:
Carcinogenicity: None of the components of this product are listed as carcinogens by NTP, IARC, or OSHA 1910(Z).
Pre-Existing Medical Conditions Aggravated by Exposure: Exposure may aggravate pre-existing respiratory or skin problems.

SECTION 4: FIRST AID PROCEDURES

Inhalation (mist): Move victim to fresh air and call emergency medical care. If not breathing, give artificial respiration; if breathing is difficult, give oxygen.
Eyes: In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Seek immediate medical attention.
Skin: Wash skin with soap and water. Remove and isolate contaminated clothing and shoes at the site.
Ingestion: DO NOT INDUCE VOMITING. Consult a physician. If vomiting occurs spontaneously, keep head below hips to prevent aspiration of liquid into the lungs.

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

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

EXTINGUISHING MEDIA: Small Fires: Dry chemical, 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:*

CHEMICAL	CAS NO.	WT %
NONE		

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

CHEMICAL	CAS NO.	WT %	RQ/TPQ Lbs
NONE			

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

CHEMICAL	CAS NO.	WT %	Final RQ Lbs
NONE			

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

CHEMICAL	CAS NO.	Estimated Concentration %
NONE		

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

LSC 90D - LIMITED SERVICE CAMPAIGN FOR
2001 - 2004 MODEL YEAR TACOMAS
CONNECTICUT DEALER INFORMATION PACKET

FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE
FIRE, BUILDING AND ZONING CODES SECTION

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

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

Where Will You Conduct The LSC? *This Section assumes that you will conduct the LSC in the service area of your dealership. If you plan to conduct the LSC elsewhere, please discontinue reading this Guide and go to the C.L.E.A.N. Dealer website at http://cleandealer.com and select the LSC-90D link. You may also call the C.L.E.A.N. Dealer EH&S Hotline at (877) 572-4347.*

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

1. **Contact your local fire official in order to: (A) provide information about the LSC; and (B) confirm, in writing, that a permit is not required, or obtain a permit if one is required.**

   NOTE: TMS is currently working with the Connecticut State Fire Marshal to obtain a general approval for the LSC, which you will use to obtain approval from your local fire official. TMS will provide this information to you as soon as it becomes available. ***To avoid confusion/delays, you should not contact your local fire official about the LSC until you receive information from TMS providing the materials you need to submit.***

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

   TMS will be providing additional information about these requirements when it sends you the State Fire Marshal's approval for the LSC.

IMPORTANT – PLEASE READ

(Page left blank intentionally.)

SUMMARY OF APPLICABLE CONNECTICUT STATE REQUIREMENTS

A. **Fire Code**[3]

1) **The LSC should not require a fire permit under the state fire code**; however, your local fire officials may have permitting procedures triggered by the LSC.

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

IMPORTANT! – FIRE CODE INFORMATION

In addition to permitting requirements, you must also comply with items 2 and 3 below as part of your implementation of the LSC.

2) The LSC must be conducted consistent with state laws regarding ventilation and fire suppression controls, which require:

(a) Adequate natural or mechanical ventilation that meets fire and building code requirements in the area where the LSC will be conducted; **and**

(b) No open flames or spark-producing equipment or appliances within 20 ft of the LSC operations; **and**

(c) No drying, curing, or fusion apparatus within 20 ft of the LSC operations; **and**

(d) No material with a flash point less than 37.8˚C (100˚F) (**Note**: Each of the LSC's anti-corrosion materials that you are being provided – interior and exterior - satisfy this requirement); **and**

(e) No solvents with a flash point less than 37.8˚C (100˚F); **and**

(f) LSC materials will be sufficiently dry and cool before the vehicle engine is started.

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

3) **Both LSC materials are combustible**[4]**; therefore:**

---

[3] Connecticut has adopted portions of the National Fire Protection Association's Uniform Fire Code – NFPA 1 (2003 ed.) and the International Fire Code (2003) as its underlying code. Specifically, Connecticut has not adopted Chapter 43 of NFPA 1 and Chapter 15 of the IFC, both which govern spray operations. In addition, Connecticut has adopted the National Fire Protection Association's NFPA 30 (Flammable and Combustible Liquids, 1996) and NFPA 30A (Automotive and Marine Service Stations, 1996) that are specific to the use of flammable and combustible liquids and applicable to the use of LSC anti-corrosion materials. Finally, Connecticut has adopted, by reference NFPA 88B (Standard for Repair Garages, 1991), which governs undercoating operations in repair garages.

[4] As defined by the National Fire Protection Association guidelines adopted by Connecticut. The Nox-Rust® 712AM is a Class IIIB combustible (Flash point >200° F) and has an HMIS fire hazard rating 1. The Nox-Rust® X128T is a Class II combustible (Flash point 105° F) and has HMIS fire hazard rating 2.

(a) DO NOT store more than 25 gallons of the LSC materials and any other regulated flammable or combustible materials in any one fire area; otherwise you will be subject to additional requirements; or

(b) **If you store more than 25 gallons of regulated flammable or combustible materials in any one fire area, then you must use a fire cabinet**. A single fire cabinet may hold up to 120 gallons. You may have up to 3 fire cabinets in each fire area. You will also have to confirm that the storage of these materials at this level does not require an operational permit in your locality from your local fire official.

B. **Building Code**[5]

1) **The LSC should not require a building permit under the state building code** because adding the LSC 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 below.)[6]

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

SUMMARY OF APPLICABLE LOCAL REQUIREMENTS

TMS will provide additional information related to these requirements at the same time it provides you with the State Fire Marshal's approval of the LSC.

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[5] Connecticut has adopted the following codes: International Building Code (2003); International Plumbing Code (2006)*; International Mechanical Code (2003); International Energy Conservation Code (2006)*; International Residential Code (2003)*; and National Electric Code (2005)*. Connecticut's building code, by definition, does not adopt any other national or model code solely by virtue of a cross-reference in the codes listed above, unless such cross referenced codes are expressly adopted by the State code. (**Code likely does not contain requirements applicable to LSC*)

[6] International Building Code Chapter 1. In particular, the application of the anti-corrosion material being used for the LSC should not trigger any requirements for changes or modifications to the electrical wiring. These materials are not flammable and will not create a flammable vapor area, and the overspray will be controlled with a temporary barrier. Moreover, the characteristics of the materials and the application process will generate limited overspray.

REGULATED WASTE MANAGEMENT SECTION

The LSC spray guns do not need to be cleaned and therefore the LSC spray operations will not generate regulated waste. However, this assumes that you reuse the tarps (floor coverings) and any materials used to set up the partitions for the LSC operations described in the **Technical Instructions.** If you dispose of the tarps and/or the partition materials you will generate a larger quantity of waste, which may impact your generator status. Additionally, because the LSC materials are combustible (i.e., they are assumed to qualify as regulated "hazardous" waste), you should handle them in the same manner as other regulated wastes at your dealership if you need to dispose of any excess materials and/or items used to clean them (e.g., rags). This section provides a brief overview of the regulated waste requirements applicable to dealerships generally.

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

2. ***IF YOU ARE NOT A SMALL QUANTITY GENERATOR, DO NOT GENERATE MORE THAN 220 POUNDS OF REGULATED WASTE PER MONTH, OR ACCUMULATE MORE THAN 2,200 POUNDS OF REGULATED WASTE AT ANY TIME. THE LSC WILL NOT IMPACT YOUR GENERATOR STATUS.***

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

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

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

   b. Because the LSC does not generate significant quantities of regulated waste, it should not impact the ability of your dealership to comply with these thresholds.

IMPORTANT – PLEASE READ

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

3. ***STORE ALL REGULATED WASTES IN PROPER CONTAINERS WITH PROPER LABELS, AND MAINTAIN REQUIRED RECORDS.***

4. ***DISPOSE OF ALL REGULATED WASTE ONLY AT FACILITIES AUTHORIZED TO RECEIVE "HAZARDOUS" WASTE USING A COMPANY LICENSED TO TRANSPORT SUCH WASTE TO THE DISPOSAL FACILITY.***

5. ***REMEMBER TO COUNT USED OIL AGAINST YOUR MONTHLY REGULATED WASTE LIMIT IF YOU DETERMINE IT TO BE HAZARDOUS.***

a. In Connecticut, used oil should be classified as a hazardous waste and managed accordingly if it has been mixed with hazardous waste and exhibits a hazardous waste characteristic or contains a listed hazardous waste. Used oil containing more than 1,000 ppm of total halogens is presumed to be a hazardous waste, though this presumption can be rebutted. As a result, used oil – if it meets any of these conditions – must be counted towards the 220 pounds per month level for exemption from more significant regulated waste requirements.

Used oil that does not constitute a hazardous waste must be recycled. We assume that your dealership generates used oil, and therefore is already familiar with the special regulated waste recycling requirements for used oil.

0001A

TOYOTA

Toyota Motor Sales, U.S.A., Inc.
19001 South Western Avenue
Torrance, CA 90501
(310) 468-4000

To: Connecticut Dealer Principals and Service Managers

Date: May, 2009

RE: Limited Service Campaign (LSC) 90D

Please find enclosed the following information you will need to initiate LSC 90D:

- ***State Specific*** Dealer Information Packet* (***Please follow these instructions prior to starting the LSC***).

  NOTE: There will be a **supplement to the Dealer Information Packet which contains materials you will need to contact your local fire marshal to obtain approval for the LSC.* ***To avoid confusion/delays, you should not contact your local fire official about the LSC until you receive further information from TMS providing the materials you need to submit.***

- LSC 90D Technical Instructions

In addition to the above, the ***Service Manager Package*** also includes the following:
- CD-ROM with document templates
- Laminated Corrosion-Preventative Compound Operation Summary
- LSC 90D Readiness Survey Instructions (see following page)**
- Information Card for the Customer (200*) following application of the Corrosion-Prevention Compound

**Additional Cards are available through the MDC.*

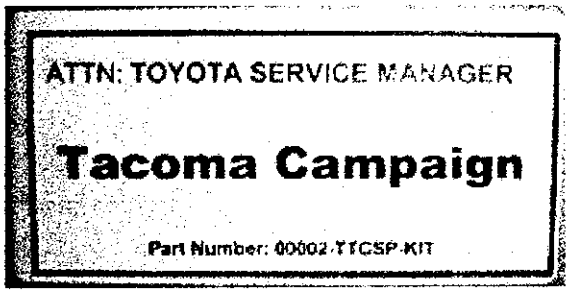
Your Parts Manager will receive only the Technical Instructions which includes the ordering information for the Corrosion-Prevention Compound Kit (P/N 00289-00KIT-DS). Please note that these kits will take 4 business days for delivery.

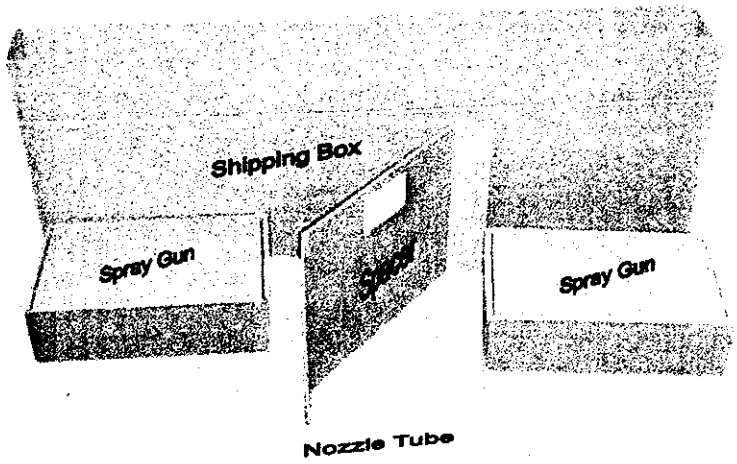
Thank you for your cooperation in this important Limited Service Campaign.

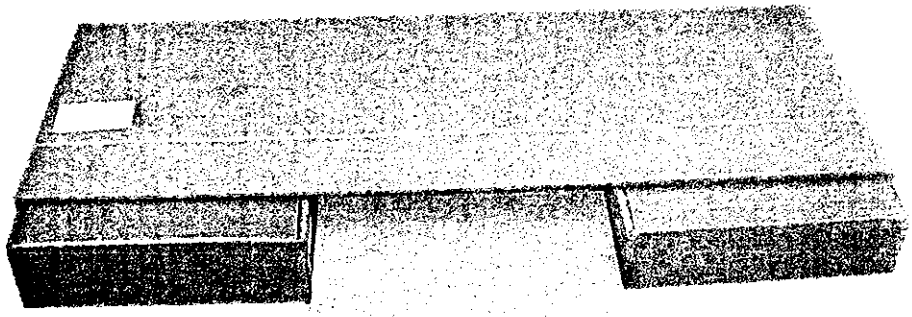
Toyota Motor Sales, U.S.A., Inc.

A web-based LSC readiness tool is now available for your use at http://cleandealer.com. You cannot begin LSC services until your *"Readiness Status"* as reflected by your *"Readiness Dashboard"* shows 100% completion in all preparation areas. **Spray Equipment Kits (Spray Gun Kits) will not be shipped until your "*Readiness Status*" reflected by your "*Readiness Dashboard*" shows 100%. Please see attached instructions.

The package will have a florescent (green, yellow or pink) label as seen below.







HOW TO IMPLEMENT THE LSC

Does your dealership already have an air permit?

Yes → For more information and support, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

No

Step 1: ***Limit VOC-Containing Material Purchases To Stay Exempt From Air Permitting.***

To stay exempt from air permitting, **you must NOT USE more than 2,000 gallons of VOC-containing coatings, paints and solvents on a 12-month rolling average basis across your entire dealership** (purchases of X128T and 712AM materials count towards this limit).

Given typical response rate and number of affected vehicles per dealership, you should be able to easily complete the LSC and use only a portion of the 2,000 gallon limit.

Can you comply with the 2,000 gallon limit?

No → Please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) to determine your compliance options.

Yes

Step 2: ***Contact Your Local Fire Official To Obtain A Fire Code Permit (Or Confirm That You Do Not Need One) And Confirm Your Compliance With Building And Zoning Code Requirements.***

See Fire, Building and Zoning Codes Section of **Federal, State and Local Requirements Guide** for compliance and contact information.

AFTER COMPLETING STEPS 1-2 *YOU ARE READY TO APPLY THE LSC MATERIALS*

But, you must complete the **LSC 90D Readiness Survey (to receive the spray equipment)**, follow the **Technical Instructions**, and Step 3 below.

COMPLETE THE LSC 90D READINESS SURVEY

Please complete the **LSC 90D Readiness Survey** available at the C.L.E.A.N. Dealer website (http://cleandealer.com) to confirm your readiness to start the LSC. ***Toyota will automatically ship the LSC Spray Guns*** to you at no charge once the survey reflects you have completed all LSC preparation steps.

Step 3: ***Keep Air Permitting Exemption Records***.

Use forms in Air Recordkeeping Section of **Federal, State and Local Requirements Guide**.

IMPORTANT – PLEASE READ

IMPORTANT – PLEASE READ

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STEP 2 – BEFORE YOU BEGIN APPLYING LSC MATERIALS, YOU WILL NEED TO NOTIFY YOUR LOCAL FIRE OFFICIAL TO OBTAIN APPROVAL FOR LSC ACTIVITIES AND MAKE SURE THAT YOUR DEALERSHIP CAN CONDUCT THE LSC IN COMPLIANCE WITH FIRE, BUILDING AND ZONING CODES

The LSC materials are combustible and subject to requirements under state and local fire codes. Building and zoning codes also may apply. The Fire, Building and Zoning Codes Section of **Federal, State and Local Requirements Guide** reviews these important requirements, but in summary, **prior to starting the LSC, you must**:

1. *CONTACT YOUR LOCAL FIRE OFFICIAL IN ORDER TO: (A) PROVIDE INFORMATION ABOUT THE LSC; AND (B) OBTAIN A PERMIT IF REQUIRED, OR CONFIRM, IN WRITING, THAT A PERMIT IS NOT REQUIRED.*

> ***What Do I Need To Give My Local Fire Official?*** *Information about the LSC and where your dealership will conduct it. We recommend calling your local fire official to alert them that you will be sending these materials.* ***However, to avoid confusion, make sure to send the letter and attachments to your fire official to ensure that the fire official has more than a verbal description of the LSC.***
>
> *Appendix A of the Fire, Building and Zoning Codes Section contains everything you need to provide to your local fire official, including a determination that TMS has obtained from the State Fire Marshal that the LSC is compliant with the fire code.*

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

> ***How Do I Confirm Compliance With Building, Zoning and Fire Code Requirements?*** *Go to the Fire, Building and Zoning Codes Section for the information you need to confirm about your dealership's operations. Remember to use Table 1 in that Section to look up whether your location is subject to any special additional requirements.*

After We Complete Steps 1 and 2, Can We Start The LSC?

Yes, if you have completed the ***LSC 90D Readiness Survey*** *(available at the C.L.E.A.N. Dealer website – http://cleandealer.com) and received the LSC spray guns.*

BUT *make sure to follow both (1) the* ***Technical Instructions,*** *and (2) Step 3 (records for permit exemption and training). You should also review the* ***Federal, State and Local Requirements Guide*** *to better understand the legal requirements for steps 1, 2, and 3.*

(Go to next page for Step 3)

IMPORTANT – PLEASE READ

IMPORTANT – PLEASE READ

STEP 3 – KEEP AIR PERMITTING EXEMPTION RECORDS

You must maintain records demonstrating compliance with the 2,000 gallon permit exemption limit discussed in Step 1. Go to the Air Recordkeeping Section of the **Federal, State and Local Requirements Guide** for instructions and recordkeeping forms.

* * * * *

COMPLIANCE NOTE REGARDING REGULATED WASTE: *The LSC spray guns do not need to be cleaned and therefore the LSC spray operations will not generate regulated hazardous waste. As a result, it should not impact your dealership's waste generator status (e.g., whether you are a Small Quantity Generator or a Conditionally Exempt Small Quantity Generator of regulated waste). However, this assumes that you reuse the tarps (floor coverings) and any materials used to set up the partitions for the LSC operations described in the* ***Technical Instructions.*** *If you dispose of the tarps and/or the partition materials you will generate a larger quantity of waste, which may impact your generator status. If you have any questions, please* ***go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).***

Additionally, should you have any excess quantities of the LSC materials and/or used rags used to clean up any LSC materials that need to be disposed, these should be handled in the same manner as other regulated hazardous waste at your dealership. See the Regulated Waste Management Section of the ***Federal State and Local Requirements Guide*** *for more information.*

* * * * *

The steps outlined above should help you ensure that your dealership conducts the LSC 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 LSC Dealer Information Packet – the **Federal, State and Local Requirements Guide** 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-LSC operations at your dealership. We assume that you already comply with these requirements.

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 your participation and cooperation in the 2001-2004 Tacoma LSC.

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

b. ***The form in the Air Recordkeeping Section is accompanied by detailed instructions on how to fill it out.***

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

a. The Fire, Building, and Zoning Codes Section reviews the applicable state and local fire, building, and zoning codes. In general, these codes apply due to the combustibility of the two LSC anti-corrosion materials. Review this Section carefully to ensure that your dealership can conduct the LSC in compliance with these codes.

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

(1) Provide information about the LSC; and

(2) Obtain a fire permit *OR* confirm, in writing, that a permit is not required.

c. **Appendix A to the *Fire, Building, and Zoning Codes Section* contains a model letter and all of the technical information necessary to provide your local fire official, except you will need to add some descriptive information about the location where you will conduct the LSC. Appendix A also includes a determination from the State Fire Marshal that the LSC is compliant with the fire code, which should also be provided to your local fire official. For more information and support, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).**

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

2. "REGULATED WASTE MANAGEMENT" SECTION

a. The Regulated Waste Management Section reviews the requirements that apply to regulated hazardous wastes generated by your dealership generally. If you are already familiar with these requirements you can skip this section.

b. The LSC spray guns do not need to be cleaned and therefore the LSC spray operations should not generate additional regulated waste. However, this assumes that you reuse the tarps (floor coverings) and any

materials used to set up the partitions for the LSC operations described in the **Technical Instructions.** If you dispose of the tarps and/or partition materials you will generate a larger quantity of waste, which may impact your generator status.

c. Additionally, because the LSC materials are combustible, the EPA and CTDEP consider them "hazardous" if they are disposed of as waste. Therefore, if your dealership has any excess LSC materials or other materials used to clean up the LSC materials (e.g., rags), then those materials should be handled in a similar manner to other regulated wastes generated at your dealership.

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

* * * * *

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-LSC 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).

LSC 90D - LIMITED SERVICE CAMPAIGN FOR 2001 - 2004 MODEL YEAR TACOMAS CONNECTICUT DEALER INFORMATION PACKET

FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE
FIRE, BUILDING AND ZONING CODES SECTION

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

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

Where Will You Conduct The LSC? *This Section assumes that you will conduct the LSC in the service area of your dealership. If you plan to conduct the LSC elsewhere, please discontinue reading this Section and go to the C.L.E.A.N. Dealer website at http://cleandealer.com and select the LSC-90D link or call the EH&S Hotline at 877-572-4347.*

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

1. **Contact your local fire official in order to: (A) provide information about the LSC; and (B) confirm, in writing, that a permit is not required, or obtain a permit if one is required.**

   Appendix A to this Section contains a model letter and all of the technical information you will need to provide to your local fire official, except you will need to add some descriptive information about the location where you will conduct the LSC. Appendix A also includes a Determination of Compliance with the Connecticut State Fire Safety Code prepared by Commercial Construction Consulting Inc. ("C3"), a professional consulting firm retained by TMS. TMS has already given this determination to the Connecticut State Fire Marshal who concurred with C3's determination that the LSC is in compliance with the Connecticut Flammable & Combustible Liquids Code.[1] A copy of the State Fire Marshal's concurrence is attached as well.

   You should include **all of these materials** with the model letter you send to your local fire official. To identify your local fire official go to Table 1 (starting at page 7).

(Go to Next Page for Item 2)

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[1] The Connecticut Flammable and Combustible Liquids Code is adopted by reference in the Connecticut State Fire Safety Code.

IMPORTANT – PLEASE READ

IMPORTANT – PLEASE READ

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

Locate your city/town/county on Table 1 (starting at page 7) to see whether it has any additional building or zoning requirements applicable to the LSC and contact your local officials as indicated.

SUMMARY OF APPLICABLE CONNECTICUT STATE REQUIREMENTS

A. *FIRE CODE*[2]

1) The LSC does not require a state fire permit under the state fire code. **However, the LSC may trigger procedures for review and approval by your local fire official.** Appendix A contains a letter from the Connecticut State Fire Marshal that the LSC is compliant with the State Flammable and Combustible Liquids Code.

> ***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

In addition to permitting requirements, you must also comply with items 2 and 3 below as part of your implementation of the LSC.

2) **The LSC must be conducted consistent with state laws regarding ventilation and fire suppression controls, which require:**

   (a) Adequate ventilation in the service area that meets fire and building code requirements where the LSC is conducted; **and**

   (b) No open flames or spark-producing equipment or appliances are permitted within 20 ft of the LSC operations; **and**

   (c) No drying, curing, or fusion apparatus is permitted within 20 ft of the LSC operations; **and**

   (d) No material with a flash point less than 37.8˚C (100˚F) (**Note**: Each of the LSC's anti-corrosion materials that you are being provided – interior and exterior – satisfy this requirement); **and**

   (e) No solvents with a flash point less than 37.8˚C (100˚F); **and**

   (f) LSC materials should be sufficiently dry and cool before the vehicle engine is started.

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

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[2] Connecticut has adopted portions of the National Fire Protection Association's Uniform Fire Code – NFPA 1 (2003 ed.) and the International Fire Code (2003) as its underlying code. Specifically, Connecticut has not adopted Chapter 43 of NFPA 1 and Chapter 15 of the IFC, both which govern spray operations. In addition, Connecticut has adopted the National Fire Protection Association's NFPA 30 (Flammable and Combustible Liquids, 1996) and NFPA 30A (Automotive and Marine Service Stations, 1996) that are specific to the use of flammable and combustible liquids and applicable to the use of LSC anti-corrosion materials. Finally, Connecticut has adopted, by reference NFPA 88B (Standard for Repair Garages, 1991), which governs undercoating operations in repair garages.

IMPORTANT – PLEASE READ

3) Both LSC materials are combustible[3]; therefore:

(a) DO NOT store more than 25 gallons of the LSC materials and any other regulated flammable or combustible materials in any one fire area; otherwise you will be subject to additional requirements; or

(b) **If you store more than 25 gallons of regulated flammable or combustible materials 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 local fire official that such storage at these levels does not require an operational permit in your locality.

Technical Note: *If you are planning on conducting the LSC in an area with a non-combustible floor (e.g., made of concrete), you may use standard plastic sheeting as described in the* ***Technical Instructions.*** *However, if the area where the LSC will be conducted has a floor made of combustible materials (e.g., wood), then the area must be covered by an approved, noncombustible, nonsparking, fire retardant material.*

(*Go to Next Page for Building Code Discussion*)

[3] As defined by the National Fire Protection Association guidelines adopted by Connecticut. The Nox-Rust® 712AM is a Class IIIB combustible (Flash point >200° F) and has an HMIS fire hazard rating 1. The Nox-Rust® X128T is a Class II combustible (Flash point 105° F) and has HMIS fire hazard rating 2.

B. Building Code[4]

1) The LSC should not require a building permit under the state building code **because adding the LSC 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 below.)[5]**

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

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[4] Connecticut has adopted the following codes: International Building Code (2003); International Plumbing Code (2006)*; International Mechanical Code (2003); International Energy Conservation Code (2006)*; International Residential Code (2003)*; and National Electric Code (2005)*. Connecticut's building code, by definition, does not adopt any other national or model code solely by virtue of a cross-reference in the codes listed above, unless such cross referenced codes are expressly adopted by the State code. (**Code likely does not contain requirements applicable to LSC*)

[5] International Building Code Chapter 1. In particular, the application of the anti-corrosion material being used for the LSC should not trigger any requirements for changes or modifications to the electrical wiring. These materials are not flammable and will not create a flammable vapor area, and the overspray will be controlled with a temporary barrier. Moreover, the characteristics of the materials and the application process will generate limited overspray.

II. SUMMARY OF APPLICABLE LOCAL REQUIREMENTS

Table 1 below identifies the local requirements applicable to the LSC (if any). It is organized by the city/local jurisdiction where your dealership is located. ***IF THE LOCALITY WHERE YOU PLAN TO CONDUCT THE LSC IS NOT LISTED IN TABLE 1 (STARTING AT PAGE 7), PLEASE GO TO THE C.L.E.A.N. DEALER WEBSITE (HTTP://CLEANDEALER.COM) OR CALL THE EH&S HOTLINE (877-572-4347).*** The sections below briefly review these requirements.

IMPORTANT REMINDER: You must contact your local fire official and provide information about the LSC prior to commencing LSC activities. BEFORE contacting your local fire official, your dealership should determine that it complies with the ventilation, storage, and spray space requirements for your jurisdiction. **You should use all of the materials in Appendix A to contact your local fire official.**

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 LSC process or considers it a "change in use" because, if so, then you may need a permit amendment. If you have any questions about zoning requirements, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (*877-572-4347*).

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

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

Table 1: Code Summary for Connecticut Locations

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Connecticut (State)		
Bristol	**Dennis Peary** **Bristol Fire Marshal** **181 North Main Street** **Bristol, CT 06010** **860-584-7940, x150 (dial 4)** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You must store combustible waste in the appropriate vessel or building as required by the Bristol Municipal Code. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Anthony Decrisantis Zoning Enforcement Officer Building Department -2nd Floor 111 North Main Street Bristol, CT 06010 860-584-6214
Colchester	**Reed Gustafson** **Colchester Fire Marshal** **52 Old Hartford Road** **Colchester, CT 06415** **860-537-7285** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify whether or not your dealership is located in an aquifer protection area. If it is, you should confirm with the Colchester Zoning and Planning Commission and Colchester Sewer and Water Commission that no additional permits are required. Contact Mark Decker Public Works Director Colchester Town Hall 127 Norwich Avenue Colchester CT 06415 860-537-7288 You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Craig Grimond Zoning Enforcement Officer/Assistant Planning Director Colchester Town hall 127 Norwich Avenue Colchester CT 06415 860-537-7280

IMPORTANT – PLEASE READ

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Cos Cob	**Tom Anderson** **Cos Cob Volunteer Fire Dept.** **200 Post Road** **Cos Cob, CT 06807** **203-622-1506** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Diane Fox Director of Planning and Zoning Town Hall 101 Field Point Road Greenwich, CT 06830 203-622-7894
Danbury	**Jim Johnson** **Danbury Fire Marshal** **155 Deer Hill Ave.** **Danbury, CT 06810** **203-796-1541** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should confirm whether or not your dealership is located in a Class I or Class II Lake Kenosia Watershed area. If it is, you should confirm with the Danbury Health, Housing & Welfare Department that the LSC operations are not prohibited. Contact Scott T. Leroy Director Health, Housing, & Welfare Department 155 Deer Hill Ave Danbury, CT 06810 203-797-4625 You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Dennis I. Elpern Director Department of Planning 155 Deer Hill Avenue Danbury, CT 06810 203-797-4525

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Enfield	**Ed Shirley** **Enfield District 1 Fire Marshal** **200 Phoenix Ave.** **Enfield, CT 06082** **860-745-1878** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Jose Giner, AICP Director Planning & Zoning Department 820 Enfield Street, Enfield, CT 06082 860-253-6355
Hartford	**Edward Casares Jr.** **Hartford Fire Marshal** **275 Pearle St.** **Hartford, CT 06103** **860-757-4530** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You must store combustible waste in the appropriate containers, and transport and dispose of combustible waste as required by the Municipal Code. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Hartford Zoning Enforcement 250 Constitution Plaza, 4th Floor Hartford, CT 06103 860-757-9239
Litchfield	**Thomas O'Hare** **Litchfield Fire Marshal** **258 West St.** **Litchfield, CT 06759** **860-567-7568** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify whether or not your dealership is located in an aquifer protection area. If it is, you should confirm with the Litchfield Land Use & Zoning Enforcement Officer that no additional permits are required. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Ruth Mulcahy Land Use & Zoning Enforcement Officer Town Offices 74 West Street P.O. Box 488 Litchfield, CT 06759 860-567-7565

IMPORTANT – PLEASE READ

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Manchester	**Robert Barker** **Manchester Fire Marshal** **75 Center St.** **Manchester, CT 06040** **860-647-3267** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	If your dealership's ventilation exhaust system recirculates fumes to interior spaces, you should verify with Manchester Building Department that a system that does not recirculate is not required for LSC operations. Contact Daniel Loos Chief Building Inspector Planning Department 494 Main Street P.O. Box 191 Manchester, CT 06045-0191 860-647-3052 You must store combustible products in compliance with the Manchester Building Code and state regulations. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact James Davis Zoning Enforcement Officer Planning Department 494 Main Street P.O. Box 191 Manchester, CT 06045-0191 860-647-3057
Middletown	**Lewis LaRosa** **Middletown Fire Marshal** **533 Main St.** **Middletown, CT 06457** **860-343-8012** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify whether or not your dealership is located in an aquifer protection area. If it is, you should confirm with the Middletown Department of Planning Conservation, and Development that no additional permits are required. Contact William Warner, AICP. Department Director Department of Planning Conservation, and Development 245 DeKoven Drive, Suite 202 Middletown, CT 06457

IMPORTANT – PLEASE READ

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Milford	**Lee Cook** **Milford Fire Marshal** **72 New Haven Ave.** **Milford, CT 06460** **203-874-6321** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Linda Stock Zoning Enforcement Officer 70 W. River Street Milford, CT 06460 203-783-3245
New Haven	**Joseph Cappucci** **New Haven Fire Marshal** **952 Grand Ave.** **New Haven, CT 06511** **203-946-6232** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	
New London	**Calvin Darrow** **New London Fire Marshal** **289 Bank St.** **New London, CT 06320** **860-447-5294** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You must arrange for your own disposal of any combustible wastes, since the Town will not collect or dispose of such materials. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Planning, Zoning & Wetlands Division Office of Development & Planning 111 Union Street, 2nd floor New London, CT 06320 860-437-6379

IMPORTANT – PLEASE READ

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Norwich	**Jim Roberts** **Norwich Fire Marshal** **10 North Thames St.** **Norwich, CT 06360** **860-892-6085** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should confirm that the facility where the LSC will take place is currently approved for spray finishing and that no additional permits or plans are required from the Norwich Building Department. Contact Gregory Arpin Assistant Building Official 23 Union Street Norwich, CT 06360 Phone: (860) 823-3768 You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Paulette Craig Zoning Enforcement Officer 23 Union Street Norwich, CT 06360 Phone: (860) 823-3752
Old Saybrook	**Dan Dobson** **Old Saybrook Fire Marshal** **302 Main St.** **Old Saybrook, CT 06475** **860-395-3133** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should confirm that the facility where the LSC will take place is currently approved for spray finishing and that no additional permits or plans are required from the Norwich Building Department. Contact Don Lucas Building Inspector Town Hall 302 Main Street Old Saybrook, CT 06475 You should verify whether or not your dealership it is located in an aquifer protection area. If it is you should confirm with the Old Saybrook Land Use Department that that no additional permits are required. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Christina (Chris) Costa, CZEO Enforcement Officer / Assistant Director Town Hall

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
		302 Main Street Old Saybrook, CT 06475 Phone: (860) 395-3131
Stamford	**Barry Callahan - Chief Fire Marshal** **Stamford Fire Marshal** **629 Main St.** **Stamford, CT 06901** **203-977-4651** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify that the LSC will not constitute a change in use or impermissible use under your building or zoning permits. Contact City of Stamford Building Department 7th Floor Govt Center 888 Washington Blvd. Stamford, CT 06904-2152 203-977-5700 Norman F. Cole Principal Planner, Zoning 7th Floor Govt Center 888 Washington Blvd. Stamford, CT 06904-2152 203-977-4711 (Zoning questions between 8:00 AM and 11:00 AM only)
Torrington	**Timothy Tharau** **Torrington Fire Marshal** **111 Water St.** **Torrington, CT 06790** **860-489-2534** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Kim Barbieri Certified Zoning & Inlands Wetland Officer 140 Main Street Room 304 Torrington, CT 06790 Phone: 860-489-2220
Wallingford	**Joseph Miccalizzi** **Wallingford Fire Marshal** **75 Masonic Ave.** **Wallingford, CT 06492** **203-294-2766** **State Fire Code**	You should confirm that your dealership is not located within the Wallingford Public Water Supply Watershed. If it is, you should confirm that you meet local material storage and recordkeeping requirements. You should verify that the LSC will not constitute a change in use or impermissible use under your building or zoning permits.

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
	jurisdiction – materials to contact local fire official are found in Appendix A.	Contact Richard F. Boyne, III Building Official, Housing Code Administrator, and Zoning Enforcement Officer 45 South Main Street, Room #G-40 Wallingford, CT 06492 203-294-2005
Watertown	**Doug Halliwell** **Watertown Fire Marshal** **935 Main St.** **Watertown, CT 06795** **860-945-5220** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify whether or not your dealership is located in an aquifer protection area. If it is, you should confirm with the Watertown Planning and Zoning Department that no additional permits are required. You should verify that the LSC will not constitute a change in use or impermissible use under your building or zoning permits. Contact Moosa Rafey Assistant Zoning Enforcement and Wetlands Enforcement Officer Town Hall Annex 424 Main Street Watertown, CT 06795 860-945-5266
West Simsbury	**Patrick Tourville** **West Simsbury Fire Marshal** **871 Hopmeadow St.** **Simsbury, CT 06070** **860-658-1971** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify whether or not your dealership is located in an aquifer protection area. If it is, you should confirm with the West Simsbury Planning and Land Use Department that no additional permits are required. Contact Lynn Charest Conservation / Inland Wetlands Zoning Compliance Officer 933 Hopmeadow Street P.O. Box 495 Simsbury, CT 06070 Phone: (860) 658-3252 You should verify that the LSC will not constitute a change in use or impermissible use under your building or zoning permits. Contact

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
		Henry Miga Building Official 933 Hopmeadow Street P.O. Box 495 Simsbury, CT 06070 Phone: (860) 658-3234 Lynn Charest Conservation / Inland Wetlands Zoning Compliance Officer 933 Hopmeadow Street P.O. Box 495 Simsbury, CT 06070 Phone: (860) 658-3252
Westport	**Edward Zygmant** **Westport Fire Marshal** **515 Post Road East** **Westport, CT 06880** **203-341-5000** **State Fire Code jurisdiction – materials to contact local fire official are found in Appendix A.**	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Laurence Bradley Planning and Zoning Director 110 Myrtle Avenue, Room 203, Westport, CT 06880 Telephone: 203-341-1030

References (all 2003 ed.): NFPA: National Fire Protection Association, Uniform Fire Code IFC: International Fire Code IBC: International Building Code IMC: International Mechanical Code	SFC: State Fire Code (CN) SBC: State Building Code (CN) SMC: State Mechanical Code (CN)

IMPORTANT – PLEASE READ

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APPENDIX A

Materials for Local Fire Code Compliance in

CONNECTICUT STATE FIRE SAFETY AND FLAMMABLE AND COMBUSTIBLE LIQUIDS CODE JURISDICTIONS:

Compliance Information

&

Model Letter, LSC Description, and C3 Determination of Compliance with Connecticut State Fire Safety Code to be submitted to the Local Fire Official

(*Electronic copies are available on the C.L.E.A.N. Dealer website - http://cleandealer.com)*

Appendix A1: Connecticut State Fire Code Jurisdictions-Summary of Fire Code Requirements

- Your local jurisdiction is subject to the State Fire Code and Flammable and Combustible Liquids Code.
- **Before you begin conducting the LSC, you will need to confirm in writing with the local fire official that a permit is not required or, if one is required, obtain it.** Under the Connecticut State Fire Safety Code and Flammable and Combustible Liquids Code, your local fire official generally makes the initial determination of compliance with the Fire Code and Flammable and Combustible Liquids Code and has the authority to require plans and specifications to ensure compliance with applicable codes and standards, and may require an operating permit for LSC spraying and storing operations. To assist you with this demonstration, we have attached a letter from the Connecticut State Fire Marshal that the LSC is compliant with the State Flammable and Combustible Liquids Code.
- **To assist you with contacting your local fire official, Appendix B2 contains (1) a model cover letter, (2) a "Determination of Compliance" letter prepared by C^3, (3) a letter from the State Fire Marshal confirming C3's Determination that the LSC is compliant with fire code requirements, and (4) a background information sheet that explains the LSC.** (Note: Electronic copies of these materials can be found on the C.L.E.A.N. Dealer website - *http://cleandealer.com*.)
- **You should do the following:**
    - Address the model letter to your local fire official and put it on your dealership's letterhead. (See Table 1 beginning at page 7.)
    - Review the background information sheet and complete it by adding facility-specific information, including descriptions of the:
        - Service area where the LSC will be conducted;
        - Storage area to be used for LSC materials; and
        - Ventilation system in the area where the LSC will be conducted.
    - **Remember - Enclose the following with the cover letter to the fire official:**
        - The **Determination of Compliance letter prepared by C^3**;
        - The **State Fire Marshal's Letter confirming the LSC's compliance with the flammable and combustible liquids code;**
        - The **completed dealership information sheet** from Appendix B2.
        - **Copies of the Material Safety Data Sheets (MSDSs)** for the Nox-Rust® 712AM and Nox-Rust® X128T materials (provided in the Air Recordkeeping Section of this Guide and on the C.L.E.A.N. Dealer website - *http://cleandealer.com*).

- Make a copy of the letter and attachments for your records before submitting to the local fire 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 LSC.

APPENDIX A2: Model Letter for Connecticut State Fire Safety Code Jurisdictions and LSC Process Information to be included with Letter

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

[DEALER LETTERHEAD]

[Insert Local Fire Official Contact Information from Table 1 (pg 7)]

Re: **REQUEST FOR APPROVAL TO ENGAGE IN A LIMITED SPRAY OPERATION IN THE EXISTING SERVICE BAY OF [LOCAL DEALERSHIP]**

Dear _____:

As you may know, Toyota is implementing a limited service campaign ("LSC") for the frames of a select number of Toyota vehicles. Toyota has asked our dealership to take part in this LSC. We are writing to provide you with information about the LSC process and to request your approval for us to proceed.

The LSC will involve the spray application of two materials, neither of which is a flammable material as defined by the Connecticut State Fire Safety Code and the Connecticut State Flammable and Combustible Liquids Code. The attached materials describe the LSC process, as well as descriptions of the materials that will be used, the material safety data sheets ("MSDSs"), the method of transferring those materials, and an explanation of the facilities where the LSC will take place.

We believe this information demonstrates that the LSC will be conducted in accordance with all applicable laws, regulations, and other codes. In particular, Toyota has engaged a professional code consultant, Commercial Construction Consulting, Inc. ("C^3"), who has confirmed that the LSC complies with applicable fire code requirements, including the Flammable and Combustible Liquids Code. Toyota has provided C^3's compliance determination to the Connecticut State Fire Marshal who has concurred with C^3's conclusion that the LSC complies with the Flammable and Combustible Liquids Code. Copies of C3's Determination of Compliance letter and the State Fire Marshal's response are attached, in additional to technical information regarding the LSC. With this information, we respectfully request that you grant any required approvals for the LSC so that we can proceed as soon as possible.

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

Best regards,
[Dealer]

[Dealership]

Attachments:
- C^3 Determination of Compliance, with description of LSC Process and MSDSs
- State Fire Marshal's Concurrence with C^3's Determination of Compliance
- Dealership information sheet

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

Commercial
Construction
Consulting. Inc.

April 22, 2009
Revised June 2, 2009

Office of State Fire Marshal
1111 Country Club Road
Middletown, CT 06457

Re: Toyota Limited Service Campaign
Compliance with the Connecticut Flammable and Combustible Liquids Code

This letter outlines Toyota's pending Limited Service Campaign ("LSC"), and describes how it complies with the Connecticut Flammables and Combustible Liquids Code. As requested, we have revised this letter to clarify certain aspects of the LSC.

I. Project Overview

Toyota is in the process of implementing a Limited Service Campaign involving the application of two anti-corrosion materials to the frame rails of certain Toyota vehicles, on the underside of the vehicles. The LSC will be implemented by Toyota dealers in a number of midwest and eastern states, including Connecticut. The LSC involves a discrete group of vehicles covered by a customer support program. The LSC is already underway in certain other states; it is expected to begin in Connecticut in June 2009 and it will conclude by October of 2010.

Following this letter are the following attachments: (1) an overview of the LSC; and (2) the Material Safety Data Sheet (MSDS) for each of the LSC materials.

II. Executive Summary

- **Dealers will be provided with clear written instructions on how to implement the LSC in compliance with environmental and fire code requirements.**
- **The materials are sprayed on the vehicle frame in two separate, sequential operations;**
- **The materials are classified as Class II and Class IIIB Combustibles, respectively;**
- **The materials have flash points in excess of 100 degrees F and are thus exempt from the provisions for spray painting;**
- **The material will be applied in regular vehicle service bays provided with adequate natural ventilation, and not in a spray room or spray booth;**
- **The materials will be installed while the vehicles are up on lifts, thus reducing the chances of vapor concentration at the floor level;**
- **The spray guns used to apply the materials have a very high transfer efficiency (92.5% for the exterior frame rail material and 99% for the interior frame rail material).**
- **Partitions around the spray space (if used) will have a 12" gap at the bottom to prevent the accumulation of vapors;**
- **There will be no open flames or open sparks within 20 feet of the spray space;**
- **No mechanical ventilation or automatic sprinklers are required for the application of these materials; and**
- **As discussed below, the LSC program is in compliance with the Connecticut State Fire Safety Code.**

III. Applicable Codes and Regulations

The Connecticut State Fire Safety Code (2005) refers to both the International Fire Code (2003) in Part III; and the Uniform Fire Code NFPA-1 (2003) in Part V. However, Connecticut amendments to both standards removed the provisions for spraying of flammable and combustible liquids.

The Connecticut Flammable and Combustible Liquids Code references NFPA-30 (1996); this standard in turn references NFPA-33 for spraying of flammable and combustible liquids. These are the two standards used in this analysis.

Connecticut Flammables and Combustible Liquids Code, referencing: NFPA-30 (1996), Flammable and Combustible Liquids Code NFPA-33 (1995), Standard for Spray Application Using Flammable or Combustible Materials

IV. NFPA-30 (1996), Flammable and Combustible Liquids Code

Regulation: *Section 1-4.4, the installation will be deemed in compliance with NFPA-30 when it is also in compliance with NFPA-33 (1995).*

Analysis: This provision allows installations in compliance with NFPA-33 to be equivalent to compliance with NFPA-30 (1996).

V. NFPA-33 (1995), Standard for Spray Application Using Flammable or Combustible Materials

Regulation: *Section 1-6 (Definitions): Combustible Liquid: A liquid having a flash point at or above 100°F (37.8°C). Combustible liquids shall be subdivided as follows:*

Class II liquid: Any liquid that has a flash point at or above 100°F (37.8°C) and below 140°F (60°C)...

Class IIIB liquid: Any liquid that has a flash point at or above 200°F (93°C).

Analysis: The material Nox-Rust® 712AM has a flash point of greater than 200°C, and is classified as a Class IIIB combustible liquid (see attached MSDS).

Analysis: The material Nox-Rust® X128T has a flash point of 105°F, and is classified as a Class II combustible liquid (see attached MSDS).

Regulation: *Section 6-2.1 (Storage in Process Areas): There shall be not more than three approved flammable liquid storage cabinets in any single process area without the approval of the authority having jurisdiction. Storage cabinets shall be listed or shall be designed and constructed to meet the requirements of NFPA-30, Flammable and Combustible Liquids Code. Any single cabinet shall contain not more than 120 gal (454 L) of Class I, Class II or Class IIIA liquids, of which not more than 60 gal (227 L) shall be Class I and Class II liquids.*

Regulation: *Section 6-2.2: The quantity of liquid located in the vicinity of spraying operations, but outside of a storage cabinet, an inside storage room, a cut-off room or attached building, or other specific process area that is cut off by at least a 2-hour fire-rated separation from the spraying operations, shall not exceed the quantity given in either (a) or (b), whichever is greater:*

(a) A supply for one day, or

(b) 25 gal (95 L) of Class IA liquids in containers, plus 120 gal (454 L) of Class IB, IC, II or III liquids in containers, plus

Two portable tanks each not exceeding 660 gal (2498 L) of Class IB, IC, Class II, or Class IIIA liquids, plus

Twenty portable tanks each not exceeding 660 gal (2498 L) of Class IIIB liquids.

Analysis: The material will be shipped to the dealers and stored in individual 1L containers, similar in appearance to one quart engine oil bottles, and will be packaged in kits of five 1L bottles per kit, two of the Class IIIB material and three of the Class II material. This material will be stored with other flammable and combustible materials within the garages in accordance with NFPA-30. The quantities stored in the vicinity of the spraying operations will be in accordance with this standard.

Regulation: *Chapter 12, Automobile Undercoating in Garages, Section 12-1 (General): Spray undercoating of automobiles in garages, conducted in areas having adequate natural or mechanical ventilation, shall be exempt from the requirements of this standard pertaining to spray coating operations, where:*

(a) Undercoating materials not more hazardous than kerosene (as classified by Underwriters Laboratories Inc. in respect to fire hazard rating 30-40) are used; or

(b) Undercoating materials using only solvents having a flash point in excess of 100°F (37.8°C) are used; and

(c) No open flames are within 20 ft (6100 mm) while such operations are conducted.

Analysis: The materials used for undercoating both have flash points greater than 100°F, and are compliant with paragraph (b) above (compliance with paragraph (a) is not required since the materials are compliant with paragraph (b)). During spraying operation no open flames will be within 20 feet. Application of these materials does not require a spray booth, nor are automatic sprinklers required.

VI. CONCLUSION

The proposed program is in compliance with the Connecticut Flammable and Combustible Liquids Code, NFPA-30 (1996). NFPA-33, as referenced by NFPA-30, does not require spray booths for the application of materials with a flash point higher than 100° F, provided specific operational conditions are met. Each of the LSC materials has a flash point over 100°F, and the relevant operational conditions will be met. Since the installation of a spray booth is not required for this program, mechanical ventilation and automatic sprinklers are also not required. The proposed program will be in compliance with the installation provisions of NFPA-33, and therefore will be in compliance with the provisions of NFPA-30.

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

Very truly yours,

Douglas R. Anderson
Manager, Code Advisory Group

M:__All Code\Code Projects 2009\Toyota\Toyota LSC C3 CT overview Jun 2 2009 (final).doc

Limited Service Campaign ("LSC") Overview

LSC PROCESS STEP 1 - VEHICLE PREPARATION

- **Preparing the Vehicle Frame:**
  - Vehicle preparation requires no chemicals, solvents, or oils
  - Steam clean or pressure wash frame (if necessary)
  - Place vehicle on lift (Exhibit A)
  - If vehicle work area is within 20 feet of an adjacent bay, install partition (with 12" open at the bottom) around the work area;
  - Remove rear wheels, spare tire, and engine under-cover
  - Mask areas where LSC materials will not be applied
  - Where necessary, place non-combustible coverings on floor
  - Manually scrape/scrub underside of vehicle to remove any debris or rust (Exhibit B)
  - Place small buckets or attach gutter to vehicle to catch any drips from frame drain holes (3 small holes per frame rail)

➢ **These steps take approximately 1¼ hour to complete, which allows time for the vehicle to cool sufficiently.**

LSC PROCESS STEP 2 - MATERIALS AND THEIR APPLICATION

- **Applying Materials to the Vehicle Frame**
  - Application of the materials will begin after the vehicle preparation step (Exhibit C). With that cool-down time, surfaces will be adequately cool before the application step begins.
  - Materials are supplied as part of a dealer's LSC kit (1 kit per vehicle) – a kit contains five 1L plastic bottles (shaped like standard engine oil bottles).
  - Two liters of the first of the materials – Nox-Rust® 712AM – are applied to the interior of the vehicle frame. Nox-Rust® 712AM: Flash Point >200° F (Class IIIB combustible; HMIS fire hazard rating of 1).
  - Three liters of the second material – Nox-Rust® X128T – are applied to the exterior of the vehicle frame. Nox-Rust® X128T: Flash Point 105° F (Class II combustible; HMIS fire hazard rating of 2). **Given that application of this second Class II combustible material does not occur until after application of the first Class IIIB combustible material, sufficient vehicle engine cool down is further assured before application of the Nox-Rust® X128T.**
  - Both materials are viscous and the LSC spray guns have a very high transfer efficiency which limits both overspray and the formation of airborne small particles.

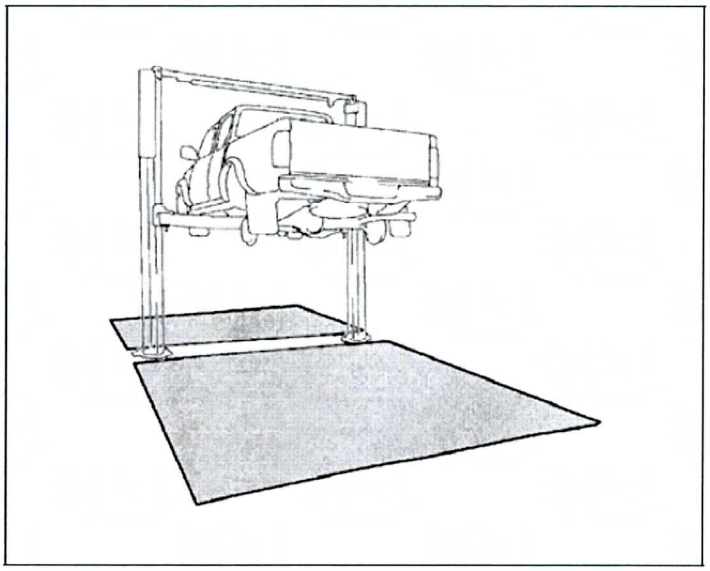
LCS PROCESS OPERATIONS

- **The LSC will be conducted consistent with NFPA 33 requirements:**
  - There will be adequate ventilation in the service area where the LSC will be conducted
  - The undercoating materials are nonflammable
  - There will be no open flames or spark-producing equipment or appliances within 20 feet of the LSC operations

- **Furthermore, the dealer will take *additional* precautions including:**
  - Fire extinguishers will be provided in the vicinity of the LSC operation
  - There will be no drying, curing, or fusion apparatus within 20 feet of the LSC operation

All LSC materials will be stored within the total quantity limits allowed by NFPA-30 and NFPA-33 for all Class II and Class IIIB materials.

Exhibit A: Vehicle Setup



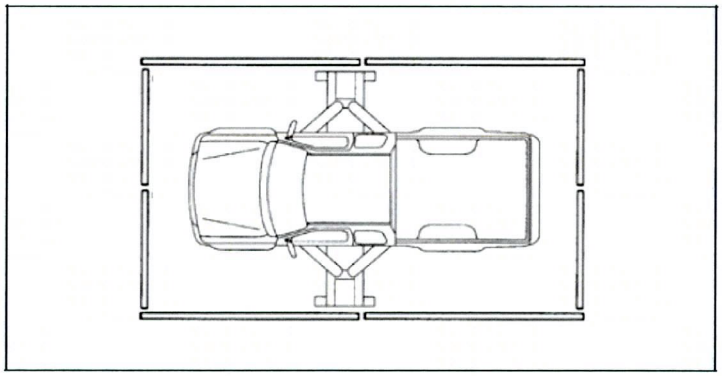
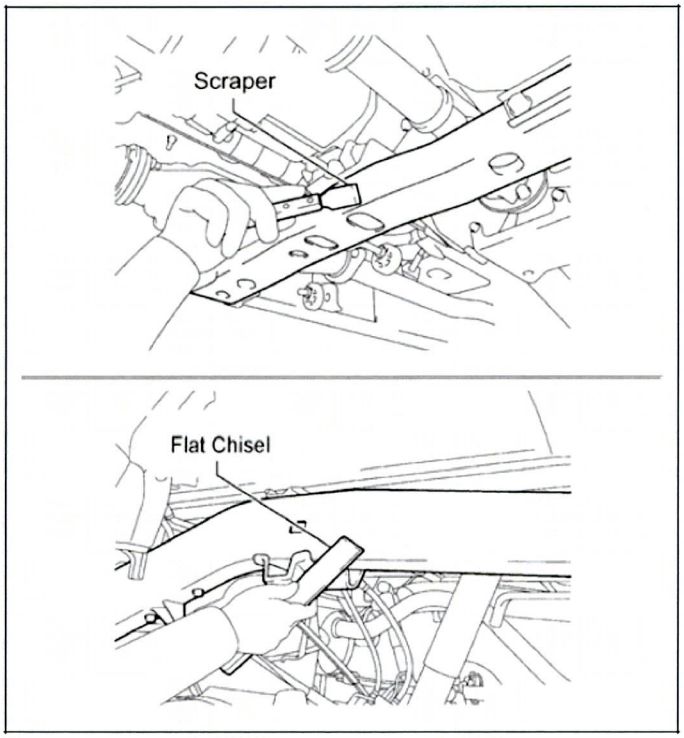
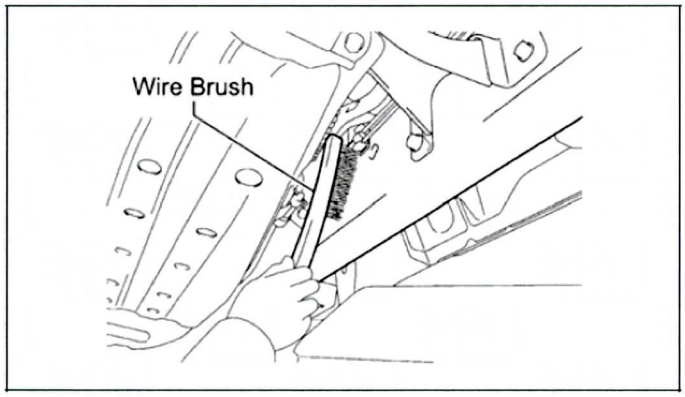


Exhibit B: Vehicle Preparation





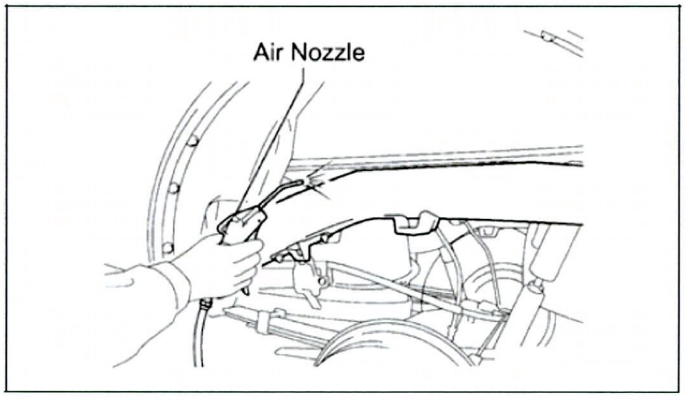
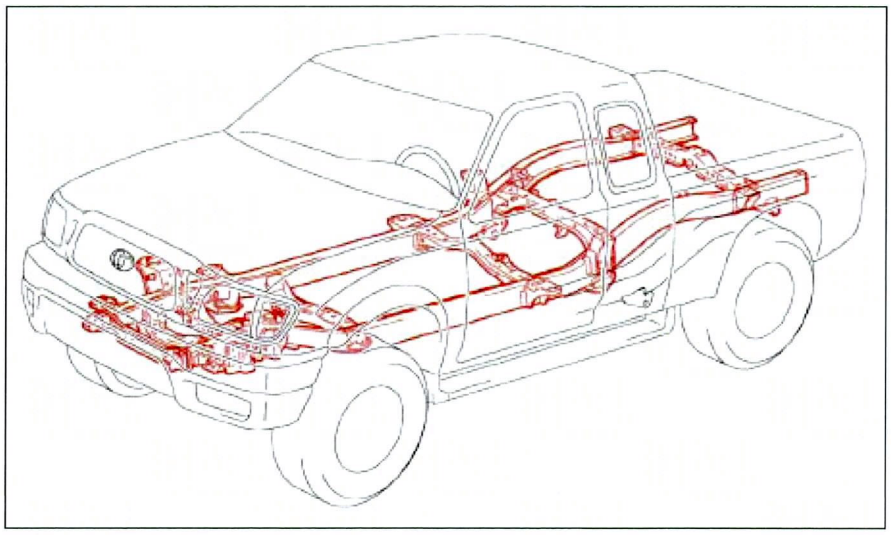
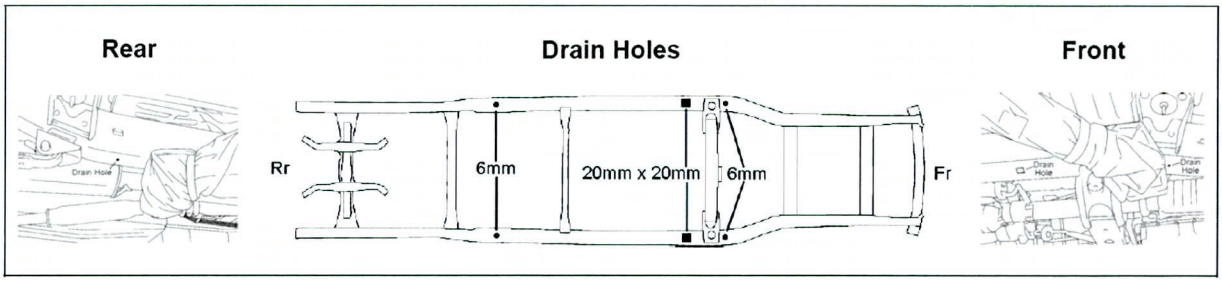


Exhibit C: Application Locations





ATTACHMENT 2: RESPONSE OF CONNECTICUT STATE FIRE MARSHAL TO DETERMINATION OF COMPLIANCE FROM COMMERCIAL CONSTRUCTION CONSULTING INC.

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC SAFETY
DIVISION OF FIRE, EMERGENCY AND BUILDING SERVICES
OFFICE OF STATE FIRE MARSHAL

June 9, 2009

Ms. Sandra H. Waddell, Esq.
Managing Counsel – E.H. & S.
Toyota Motor Sales USA, Inc.
19001 South Western Avenue HQ12
Torrance, CA 90501

Re: Limited Service Campaign

Dear Attorney Waddell:

We have reviewed the revised June 2, 2009 letter and attached LSC overview from Commercial Construction Consulting, Inc. regarding the Toyota Limited Service Campaign. With this letter and along with previously submitted materials, we have determined that the Limited Service Campaign is in substantial compliance with the requirements of the Connecticut Flammable & Combustible Liquids Code with respect to incidental spray operations.

If there are any questions, please contact either Fire & Life Safety Supervisor Joseph Kingston or Fire & Life Safety Specialist John Doucette in our Bureau of Engineering at (860) 685-8350.

Sincerely,

John J. Blaschik, Jr.
Deputy State Fire Marshal
Office of State Fire Marshal

JB:cb

Phone: 860-685-8380 Fax: 860-685-8359
1111 Country Club Road
Middletown, CT 06457-2389
Website: www.ct.gov/dps
An Equal Opportunity Employer

ATTACHMENT 3: DESCRIPTION OF LOCATION WHERE LSC WILL TAKE PLACE AT [INSERT NAME OF DEALERSHIP]

- We will conduct the LSC 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 LSC will be conducted.

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

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

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

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

ATTACHMENT 4: LSC MATERIAL MSDSs

[INSERT MSDSs]