

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

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To:

Maryland Dealer Principals and Service Managers

Date:

October 2009

RE:

Limited Service Campaign (LSC) 90D

Enclosed, please find information required to initiate LSC 90D in your geographic area:

- State Specific Dealer Information Packet (Please follow these instructions prior to starting the LSC).
- LSC 90D Technical Instructions

In addition to the above, the Service Manager Package also includes the following:

- Dealership Specific VIN List
- Laminated Corrosion-Preventative Compound Operation Summary
- LSC 90D Dealership Readiness Tool Guidelines (see note on page 2 for Spray Gun order instructions)
- LSC 90D Binder Tab
- Customer Information Card, MDC #00411-09001 (200 pieces*) to leave with the vehicle following application of the Corrosion-Prevention Compound
 *Additional Cards are available through the MDC

Your Parts Manager will receive only the following:

- Technical Instructions; this includes ordering information for the Corrosion-Prevention Compound Kit (P/N 00289-00KIT-DS). Please note that these kits will take four business days for delivery.
- · Dealership Specific VIN List
- LSC 90D Binder Tab

IMPORTANT: Your dealership will be contacted by an EH&S Specialist from KPA, LLC to conduct an LSC readiness survey and help guide you through facility preparations. To avoid unnecessary delays, please do the following:

- Prepare for your KPA readiness survey: review the readiness questionnaire at http://cleandealer.com
 (follow the link to LSC 90D) and conduct advance research as necessary. The Service Manager and/or dealership EH&S Coordinator should be prepared to respond to survey questions when the KPA Specialist calls.
- Read the detailed dealer package immediately: read the entire package carefully paying special note to permitting requirements and associated forms.
- <u>Complete all required forms:</u> DO NOT contact any agency regarding the LSC until you have done this.

Please give the KPA EH&S Specialist the same courtesy you give your TMS Region representatives. If you have any questions, please contact your Region or the LSC EH&S hotline at (877) 572 4347.

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

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

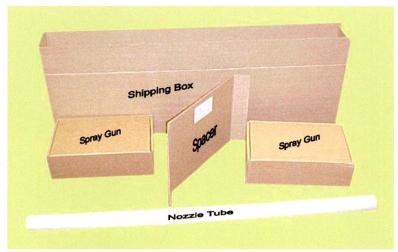
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NOTE: A web-based LSC 90D Dealership Readiness Tool is now available for your use at http://cleandealer.com (follow the LSC 90D link). Special Equipment (Spray Gun) Kits will ship automatically as soon as your "Readiness Status" as reflected by your "Readiness Dashboard" shows 100% completion in all preparation areas. Special Equipment (Spray Gun) Kits will not be shipped until your "Readiness Status" reflected by your "Readiness Dashboard" shows 100%. Please see attached instructions.

When received, the Special Equipment (Spray Gun) Kit package will have a fluorescent (green, yellow or pink) label as seen below for easy identification.









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Important Information – LSC 90D Dealer Readiness Tool

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. KPA will help you get started with this process when they call to conduct your readiness survey. It is your responsibility to complete your preparations for the LSC and update your "Readiness Dashboard". Special Equipment Kits (spray gun kits) will be automatically shipped when your "Readiness Status" reflected by your "Readiness Dashboard" shows 100%.



1. GO TO THE C.L.E.A.N. DEALER WEBSITE & OPEN THE LSC 90D SUPPORT PAGE

- a) Enter http://cleandealer.com into the URL.
- b) Click on the "LSC 90D Support" link located on the lower left corner of the webpage.



2. LOG INTO THE LSC 90D SUPPORT WEBSITE

- a) Enter your Dealership Code and Zip Code.
- b) Click on the "Login" button.







3. READ AND ACCEPT THE TERMS AND CONDITIONS FOR USING THIS DATABASE

- a) Read the Terms and Conditions.
- b) *Accept the Terms and Conditions by clicking on the box labeled, "By ticking this box you agree to above policy".
- c) After marking the box, click the "Accept Terms" button.

*If you have questions or concerns about accepting these terms and conditions, please call the LSC 90D support hotline at 877-KPA4EHS (877-572-4347). In most cases the Terms and Conditions will only need to be accepted during the initial sign in.

4. COMPLETE THE READINESS SURVEY

a) Click on the "Continue to Survey" link located on the "Readiness Dashboard" page.

Note:

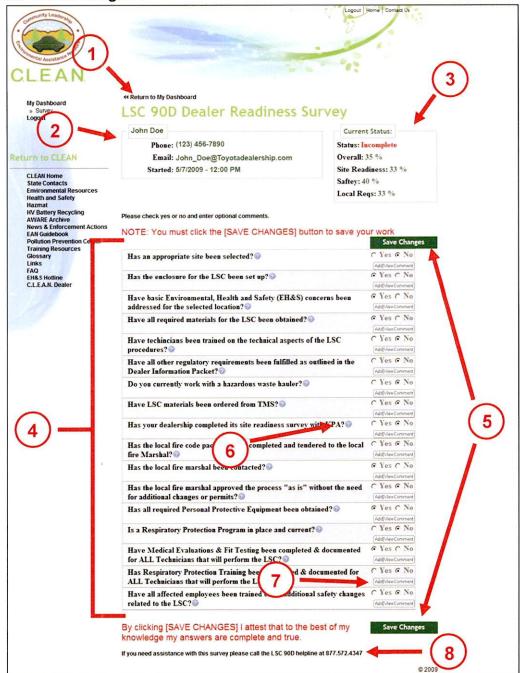
Additional information can be obtained by using the links outlined below:

1	View your "Readiness Status". Special Equipment Kits (spray gun kits) will be automatically shipped when your "Readiness Status" shows "Complete 100%".
2	Submit questions relating to the 90D Readiness Survey. These questions are reviewed and answered by LSC 90D Specialists. You can generally expect a response within one business day.
3	Review posted documents. Some of these documents may include: The Dealer Information Packet Model Fire Official Letter MSDS for both the 712AM and the X128T Website instructions Other useful documents needed to perform this LSC.

- b) When you first begin the survey a box will appear in the lower right corner of the screen. Before proceeding you will need to provide the **LSC Program Manager's information:
 - First Name
 - Last Name
 - Job Title
 - Phone Number and Extension (Optional)
 - Email address (Optional)

**The LSC Program Manager is the dealership associate coordinating preparations for this Limited Service Campaign. In most cases this will be the Service Manager. This information will only need to be submitted during the initial sign in.

c) Fill in the survey. Each time your dealership's status changes make sure to update the survey and click "Save Changes".



1	"Return to My Dashboard Link" - This link returns the user to the "Readiness Dashboard".	
2	"User Information Box" - This box populates with the data that was entered in step 4b. It also	
2	inserts a timestamp for when the 90D Readiness Survey was first started.	
	"Current Status Box" - This box indicates the preparation completed by the dealership. Special	
3	Equipment Kits (spray gun kits) will be <u>automatically</u> shipped when this box indicates all	
	the overall preparations are complete.	
4	"Survey Questionnaire" - The information provided in this section indicates the preparation level	
4	for each dealership.	
5	"Save Changes" – When finished updating the information on the survey, click the Save Changes	
9	button before exiting the screen or the updated information will be lost.	
C	"Help Bubble" - This help tool provides additional clarification for each question on the 90D	
6	Readiness Survey.	
7	"Add/View Comments" - By clicking on this button comments/notes can be added and reviewed.	
8	"Service Help Number" – If you need additional information please call the number shown here.	
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LSC 90D - LIMITED SERVICE CAMPAIGN 2001 - 2004 MODEL YEAR TACOMA FRAME CORROSION-PREVENTATIVE COMPOUND TECHNICAL INSTRUCTIONS

Please review this entire information packet with your Service and Parts staff. This will familiarize them with the proper step-by-step procedures required to implement this LSC.

INTRODUCTION

Toyota will initiate a Limited Service Campaign (LSC) 90D to inspect and apply a Corrosion-Preventative Compound (specialized protective sealant) to the frames of certain 2001 through 2004 model year Tacoma vehicles WITHOUT RUST CORROSION PERFORATION that are registered in the following states and the District of Columbia:

CT, DE, IL, IN, KY, MA, MD, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, and WV

Toyota has received reports that a small number of 2001 through 2004 model year Tacoma vehicles operated in severe cold climate areas with high road salt use exhibited excessive rust corrosion to the frame, causing perforation of the metal. Toyota investigated these reports and determined that the frames in this small number of vehicles may not have adequate corrosion-resistant protection for use in this environment. This combined with prolonged exposure to road salts and other environmental factors may contribute to the development of excessive rust corrosion in the frames of some vehicles. This condition is unrelated to and separate from normal surface rust which is commonly found on metallic surfaces after some years of usage and/or exposure to the environment.

If the customer's vehicle is registered in AK, AL, AR, AZ, CA, CO, FL, GA, HI, IA, ID, KS, MT, LA, MO, MS, NC, ND, NE, NM, NV, OK, OR, SC, SD, TN, TX, UT, WA, WY and the U.S. Territories, the customer will *not* need to do anything at this time. If the customer moves to an area in which the vehicle may experience prolonged exposure to road salts and other environmental factors, they will need to contact any Toyota dealer and make arrangements to have the vehicle inspected and, if appropriate, the specialized protective sealant applied.

OWNER NOTIFICATION

The owner notification will commence as soon as the LSC 90D Readiness website indicates dealers in a given area are prepared to perform the LSC. Each dealer will be contacted and provided a packet outlining the individual regulatory requirements in their state prior to starting the Corrosion-Preventative Compound application.

Dealers should apply the specialized protective sealant as outlined in the Technical Instructions section. The application should only be performed for vehicles that are registered in the states affected by the LSC and have no signs of rust corrosion perforation.

Please note that only owners of the affected vehicles will be notified. If a dealer is contacted by an owner of an affected vehicle, who has not yet received a notification, please **verify eligibility for the LSC by confirming through Dealer Daily/TIS**.

DEALER/OWNER LISTS

Affected vehicle VIN lists (VIN only, due to changes in Privacy Laws) for the LSC have been distributed to each dealership's Service and Parts Managers. These lists are based upon the dealership's Primary Marketing Area (PMA) or selling dealership where applicable. Based upon our records, a dealership which does not have an affected vehicle in their PMA will receive a report indicating so.

APPLICABILITY PERIOD

This LSC will be available at no cost to the vehicle owners until *October 31, 2010.* All terms of the affected vehicle's Toyota Basic Warranty will remain intact regardless of whether or not the customer takes advantage of the LSC.

AFFECTED VEHICLES

There are approximately **145,000** Tacoma (2001 through 2004 model year) vehicles covered by this LSC. For the affected VIN range, reference the Technical Instructions (TI) section.

Please note that as the regulatory challenges are addressed only owners of the affected vehicles registered in that specific state will be notified. VINs for that specific state will be loaded simultaneously. If a dealer is contacted by an owner of an affected vehicle, who has not yet received a notification, please *verify eligibility for the LSC by confirming through Dealer Daily/TIS*.

A UIO State Matrix is listed to inform dealers of the number of vehicles in their state by model year.

STATE	2001	2002	2003	2004	TOTAL
CT	1,411	1, 4 11	1,378	1,390	5,590
DC	62	73	78	69	282
DE	252	296	298	318	1,164
IL.	1,643	1,537	1,385	1,481	6,046
IN	1,142	991	938	887	3,958
KY	2,242	2,124	1,875	1,559	7,800
MA	3,131	3,279	3,496	3,708	13,614
MD	2,543	2,812	2,795	2,869	11,019
ME	881	925	878	1,032	3,716
М	861	853	798	689	3,201
MN	899	839	707	699	3,144
NH	1,232	1,373	1,331	1,328	5,264
NJ	2,174	2,180	2,259	2,089	8,702
NY	2,960	3,012	3,079	3,249	12,300
OH	2,483	2,339	2,188	2,296	9,306
PA	3,588	3,991	3,751	3,985	15,315
RI	579	596	585	597	2,357
VA	4,750	5,216	5,329	5,489	20,784
VT	772	854	849	952	3,427
8	1,175	917	858	880	3,830
W	1,596	1,345	1,225	1,243	5,409
Totai	36,376	36,963	36,080	36,809	146,228

MATERIAL ORDERING

Since not all states are included in the LSC, the Corrosion-Preventative Compound materials will be placed on Manual Allocation Control (MAC).

While the materials are on MAC, a representative from TMS Quality Compliance will review each order and contact the dealership's Parts Manager to verify the necessity of the order. This will ensure an adequate and balanced material inventory.

If there are **special** circumstances where a dealer is having difficulty receiving its materials, dealership associates may contact (310) 468-5516 to research their order. The associate should have the following information ready to expedite research of the order status:

- Dealer Information (Dealer Code, Contact Name, Telephone Number)
- Order Reference Number
- Customer Name and Vehicle 17-digit VIN

The necessary materials can be ordered through the parts system on Dealer Tire. They will be shipped directly from AMREP. Please refer to the Technical Instructions section for part number information. Please note that only dealers in the Severe Cold Climate States will be able to order Corrosion-Preventative Compound materials once the regulatory challenges in the state are addressed.

- Do not order more than your immediate needs. THESE MATERIALS ARE NOT FOR RETAIL
 SALE AND ARE ONLY INTENDED FOR USE AS PART OF THE LSC. Ensure that the CorrosionPreventative Compound is stored at room temperature (please refer to the MSDS located in the
 Appendix).
- The material part number will be drop-shipped from AMREP to your dealer. Please note that
 deliveries are only scheduled on business days. Saturday deliveries are not available. Allow 5
 business days for order processing and shipping of the material to your dealership.

The Corrosion-Preventative Compound will entail sealing the frame with two different Nox-Rust® products. The Nox-Rust® 712AM, a paraffin wax based product, will be applied inside the frame. The Nox-Rust® X-128T, a mineral spirits based wax product, will be applied to the external surfaces. (Do not use the Nox-Rust® name and trademarks without the prior written consent of Daubert Chemicals Company Inc. and Toyota Motor Sales, U.S.A., Inc.)

BEFORE YOU START

Three types of legal requirements apply to the LSC: (1) air pollution control laws; (2) building, zoning and fire codes; and (3) regulated waste requirements. The Getting Started Guide and the Federal, State and Local Requirements Guide review these legal requirements, provide step-by-step instructions for how to comply, and include forms to create and maintain compliance records. These Guides assume that you will conduct the LSC in the vehicle service area of your dealership. Please refer to the Getting Started Guide and the Guide to Federal, State and Local Requirements that accompany these Technical Instructions for information about how to conduct the LSC consistent with these different legal requirements.

Most dealerships should be able to meet the necessary requirements within two weeks of receiving this package. An LSC 90D Readiness Survey (http://cleandealer.com*) has been created to help track each dealership's preparation. Toyota's business partner, KPA, will be contacting each dealership to provide additional assistance. Once the LSC 90D Readiness Survey indicates a dealership has met all the necessary requirements, a Special Equipment Kit (spray gun kit) will automatically be mailed to that facility at no charge.

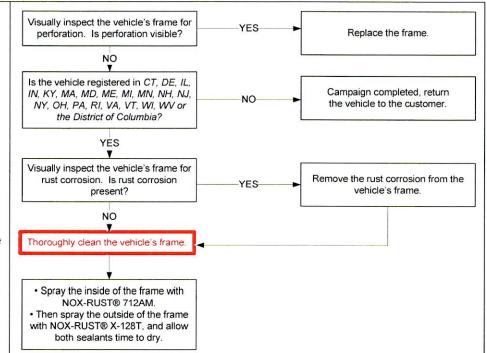
*Follow the LSC 90D Support link located in the left bottom corner of the webpage.

Please note, before starting this LSC all dealer associates involved with this LSC must be properly trained using the Dealer Information Packet, Laminated Corrosion-Preventative Compound Operation Summary and these Technical Instruction. Training should be documented in the associate training log.

WARRANTY PROCESSOR INSTRUCTIONS

Please note the following for this LSC:

- This LSC expires on October 31, 2010.
- Only vehicles registered in CT, DE, IL, IN, KY, MA, MD, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, VW or the District of Columbia are eligible for the application of the Corrosion-Preventative Compound.



Operation Codes:

This activity represents a unique combination of a CSP and a LSC. Therefore a <u>CSP claim and a LSC claim</u> will need to be filed for each Corrosion-Preventative Compound Application. Use the correct LSC or CSP designation when filing Operation Codes (see left hand side of table below):

CSP	Op. Code	Description	Flat Rate Hour				
ZTH	8630J1	Inspect Frame For Rust Perforation (No Perforation Found)	0.6 Hr/Veh				
Note: The	Note: The flat rate time for Operation Code 8630J1 includes 0.1 hour for campaign administrative cost per unit for the dealership.						

And the following Op. Codes

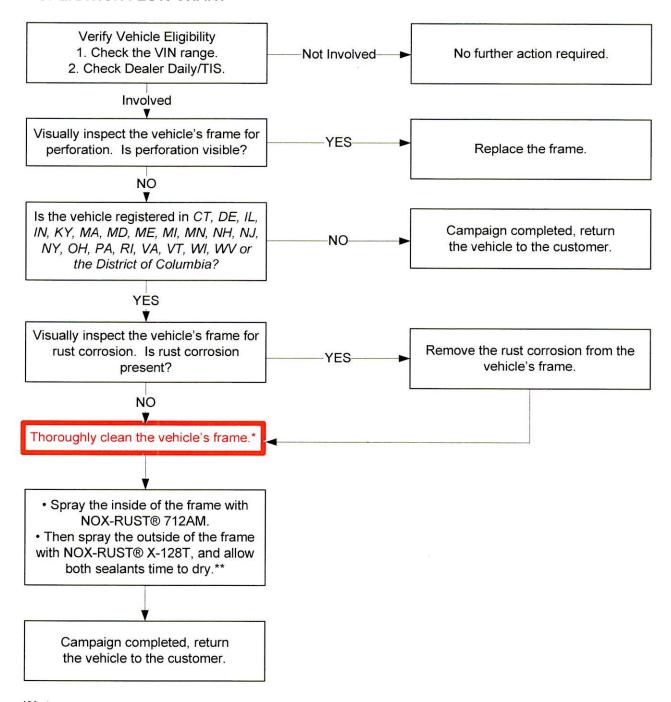
LSC	Op. Code	Description	Flat Rate Hour
90D	8630JM	Apply Corrosion-Preventative Compound By Dealer	3.6 Hr/Veh

Allowable Sublets for LSC 90D Claims:

- Rental Car: Use "RT" sublet type for Op. Code <u>8630JM</u>. During the Corrosion-Preventative Compound application, customer rental car through the Toyota Rent-A-Car (TRAC) Program is available for a maximum of 3 days. Follow the Toyota Transportation Assistance Program (TTAP) guidelines.
- Materials/Supplies: Use "YA" sublet type for Op. Code <u>8630JM</u>. A max. \$36/vehicle cost for LSC prep and application materials/supplies (fire-retardant poly sheeting (tarp), masks, tape, gloves, partition, waste disposal, etc.) will be accepted.

TECHNICAL INSTRUCTIONS

I. OPERATION FLOW CHART



*Note:

Due to the flash point of the NOX-RUST® materials, allow sufficient time for the vehicle (i.e., the exhaust system) to cool down before beginning the chemical application. By following the FRAME APPLICATION WORK PROCEDURE the vehicle will have additional time to cool before the NOX-RUST® is applied. Please refer to the MSDS for flash point temperatures.

**Note:

Keep records to comply with Federal/State/Local regulations and requirements. See the Federal,
 State and Local Requirements Guide that accompanied these instructions.

II. IDENTIFICATION OF AFFECTED VEHICLES

A. AFFECTED VIN RANGE

NOTE:

Vehicles registered in following states are affected: CT, DE, IL, IN, KY, MA, MD, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, WV or the District of Columbia

Model	WMI	Year	VIN Range	
Wiodei	4 4 (4))	i cai	VDS	Range
			GM92N	Z727245 – Z880431
			GN92N	Z726201 – Z880433
			HN72N	Z726498 – Z880444
			NL42N	Z718168 – Z880440
			NM92N	Z718261 – Z880427
		2001	PM62N	Z718416 – Z880351
		2001	SM92N	Z718295 – Z880439
			SN92N	Z718166 – Z880436
			VL52N	Z718280 – Z880441
			VN52N	Z718355 – Z879914
			WM72N	Z718164 – Z880443
			WN72N	Z718395 – Z880438
			GM92N	Z000001 – Z899998
			GN92N	Z000190 – Z899894
			HN72N	Z000002 – Z899999
			NL42N	Z000006 – Z899978
			NM92N	Z000233 – Z899936
TACOMA	5TE	2002	PM62N	Z000022 – Z899995
IACCIVIA		2002	SM92N	Z000245 – Z899972
			SN92N	Z000012 – Z899646
			VL52N	Z000013 – Z899990
			VN52N	Z000017 – Z898219
			WM72N	Z000058 - Z899904
			WN72N	Z000019 - Z899885
			GM92N	Z145585 – Z305459
			GN92N	Z145318 – Z305507
			HN72N	Z145460 – Z305500
			NL42N	Z145319 – Z305504
			NM92N	Z145535 – Z305379
		2003	PM62N	Z145471 – Z305481
		2003	SM92N	Z145555 – Z305506
			SN92N	Z145622 - Z305491
			VL52N	Z145395 – Z305505
			VN52N	Z145797 – Z304523
			WM72N	Z145487 – Z305493
			WN72N	Z145316 - Z305501

AFFECTED VIN RANGE CONTINUED...

NOTE:

Vehicles registered in following states are affected: CT, DE, IL, IN, KY, MA, MD, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, WV or the District of Columbia

Model	WMI	Year		VIN Range
Wodel Will	V V I V II	i cai	VDS	Range
			GM92N	Z305895 - Z466734
			GN92N	Z305509 - Z466774
	5TE	5TE 2004	HN72N	Z305686 - Z466778
			NL42N	Z305510 - Z466783
			NM92N	Z305853 - Z466785
СОМА			PM62N	Z305763 - Z466764
SOIVIA			SM92N	Z305863 - Z466748
			SN92N	Z305944 - Z466746
			VL52N	Z305639 - Z466782
			VN52N	Z306177 - Z454172
			WM72N	Z305789 - Z466757
			WN72N	Z305508 - Z466784

- Check Dealer Daily/TIS to confirm the VIN is involved in this LSC. This will verify the vehicle is
 affected and has not already been completed prior to dealer shipment or by another dealer.
- TMS warranty will not reimburse dealers for repairs conducted on vehicles that are not affected or were completed by another dealer.

III. PREPARATION

A. PARTS

Please be aware that only dealers in CT, DE, IL, IN, KY, MA, MD, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, WV, or the District of Columbia will be allowed to order kits for the Corrosion-Preventative Compound.

The necessary kits can be ordered through the Complete Maintenance Care. They will be shipped directly from AMREP. Please refer to the table below and the Technical Instructions for part number information. Dealers should not order chemicals if they do not have any vehicles listed on their dealer reports, or until they have confirmed owner appointment. However, please keep in mind it will take at least 4 business days for kit delivery.

Part Number	Part Description	Quantity
00289-00KIT-DS	Corrosion-Preventative Compound Kit	1

The kit listed above includes the following parts:

- NOX-RUST® 712AM = Internal Frame Application = Qty 2 Liters
- NOX-RUST® X-128T = External Frame Application = Qty 3 Liters
- These materials are intended for use at dealerships and body shops only.
 They are not for resale
- 1. When Ordering the Corrosion-Preventative Compound kit please note:
- Refer to the Appendix for the Material Safety Data Sheet (MSDS).
- The Corrosion-Preventative Compound Kit listed will be drop-shipped from AMREP, not your local PDC. Do not order more than your immediate needs, as these materials are non-returnable and non-refundable.
- Orders for this kit should be placed separately from orders of other drop ship chemicals.
- 2. When Storing the Corrosion-Preventative Compound kits please note:
- Please follow local, state and federal regulations for hazardous materials storage and disposal that are explained in the Regulated Waste Management Section of the Federal, State and Local Requirements Guide.
- Ensure that the materials are stored at room temperature (refer to the MSDS for detailed instructions).

The plugs for the frame holes can be ordered through the dealer's facing PDC. Please refer to the table below for part number information. Dealers should not order parts if they do not have any vehicles listed on their dealer reports, or until they have confirmed owner appointment.

Part Number	Part Description	Quantity
90950-01539	Hole Plug	2

B. SUPPORT MATERIALS

Part Number	Part Description	Quantity
00411-08002	LSC 90D Laminated Flowchart (Included in each Service Manager Package)*	1
00411-09001	Corrosion-Preventative Compound Information Hang Tag (A quantity of 200 are included in each Service Manager Package)**	1

^{*} Additional LSC 90D Laminated Flowcharts can be ordered through the MDC.

^{**}Additional Corrosion-Preventative Compound Customer Information Hang Tags can be ordered in packages of 50 through the MDC.

C. STANDARD TOOLS & EQUIPMENT

- Standard hand tools
- Flat chisel
- Scraper
- Wire brush
- Air nozzle
- Thermometer
- Air coupler (quantity 2)

SPECIAL EQUIPMENT KIT*

The items below have been pre-packaged as a kit, and will be provided at no charge ONLY to dealers in the affected states who are involved in this activity and whose 90D Readiness Survey indicates all the necessary requirements have been met. This pre-packaged kit includes a 6 mm internal spray nozzle that will not be used at this time; please **DO NOT** discard it.

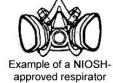
- Spray Gun with pressure regulator (quantity = 2) (Each spray gun is the same; please dedicate one for internal and the other for external frame application.)
- External spray nozzle (to be used on the outside of the frame)
- 8 mm internal spray nozzle (to be used on the inside of the frame)
- 6 mm internal spray nozzle (not used at this time; please **DO NOT** discard)

*Once the LSC 90D Readiness Survey (http://cleandealer.com**) indicates a dealership has met all the necessary requirements, a Special Equipment Kit will automatically be sent to that facility.

**Follow the LSC 90D Support link located in the left bottom corner of the webpage

D. MATERIALS & SUPPLIES

- Protective eyewear
- Dust mask
- NIOSH-approved respirator for organic vapors and mist control*** (Follow all Federal, state and local environmental, health and safety requirements such as OSHA. Please refer to the MSDS for details on each material.)



- Protective gloves
- Chemical Resistant Gloves (Viton, PVOH, etc.)
- Masking tape
- Fire-retardant poly sheeting (tarp) or covering (if you can not purchase from a local supplier, contact A Plus Environmental at 562-483-1060.)
- Plastic (Saran Wrap) sheet (for spray gun storage)
- 7ft rain gutters (quantity = 2)
- Rain gutter end caps (quantity = 4)
- \/\line
- Partitions (The type, size and number of partitions used will depend on each dealer's facility.)
- Shop cloth/paper towels
- Bucket (quantity = 8)
- Funnel (quantity = 2)

***NOTE:

- The MSDS for both 712AM and X-128T located in the Appendix instruct applicators to use a "NIOSH-approved respirator for organic vapor and mist to control exposure where ventilation is inadequate."
- It is up to the individual dealership to ensure compliance with OSHA regulations.
- If you require further assistance in regards to NIOSH approved respirators, we have found 3M® to be a useful reference/source.

3M® Technical Assistance:

1-800-243-4630

3M® Customer Service:

1-800-328-1667

3M® Web Site:

www.3m.com/occsafety

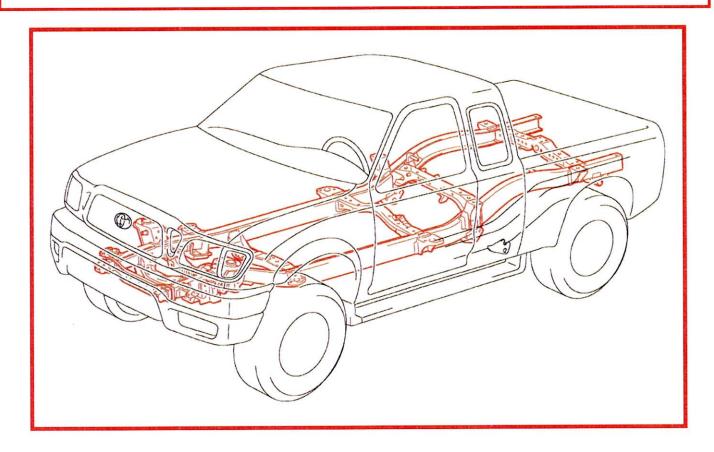
IV. BACKGROUND AND COMPONENTS

Toyota received reports that a small number of 2001 through 2004 model year Tacoma vehicles operated in severe cold climate areas with high road salt use exhibited excessive rust corrosion to the frame, causing perforation of the metal. Toyota investigated these reports and determined that the frames in this small number of vehicles may not have adequate corrosion-resistant protection for use in this environment. This combined with prolonged exposure to road salts and other environmental factors may contribute to the development of excessive rust corrosion in the frames of some vehicles. This condition is unrelated to and separate from normal surface rust which is commonly found on metallic surfaces after some years of usage and/or exposure to the environment.

 The Corrosion-Preventative Compound application process involves spraying the internal and external surfaces of the Tacoma's frame with a specialized protective sealant material. Please follow all instructions provided to the dealership in the Getting Started Guide and the Federal, State and Local Requirements Guide.

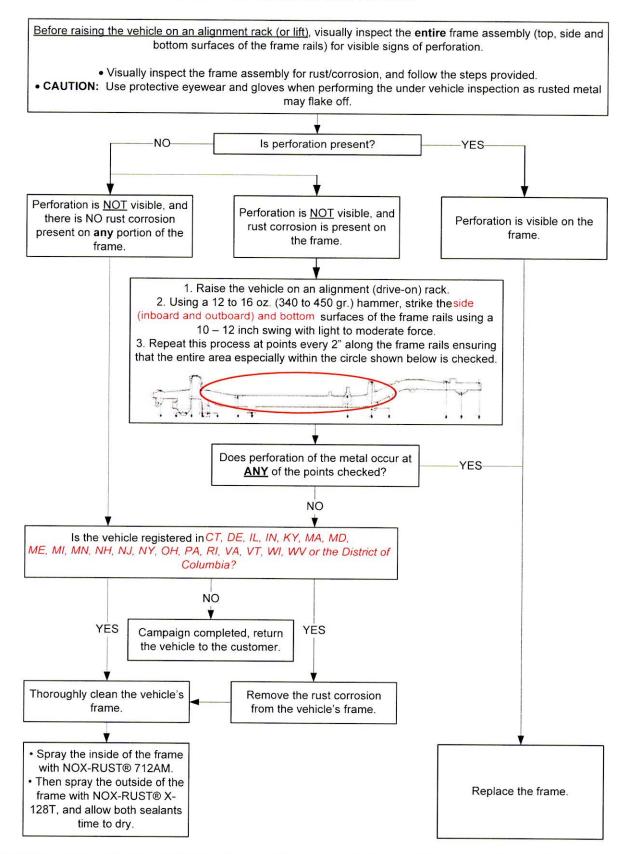


Important Reminder: Because of variations in State laws, dealerships conducting the LSC in certain States may require government approvals <u>prior to</u> starting the LSC. Depending upon the state, dealerships also may be subject to restrictions on the number of vehicles to which the LSC materials can be applied in any single day, week or month. Please refer to the Getting Started Guide and the Federal, State and Local Requirements Guide that accompany these Technical Instructions for important information about any such approvals or restrictions that may apply to your dealership. Your dealership must adhere strictly to these requirements.



V. VEHICLE INSPECTION WORK PROCEDURE

A. FRAME RUST CORROSION PERFORATION INSPECTION



NOTE: Please reference the laminated flowchart for more details, and for pictures illustrating the frame's condition used in the judgment process.

VI. FRAME APPLICATION WORK PROCEDURE



Important Reminder: Because of variations in State laws, dealerships conducting the LSC in certain States may require government approvals <u>prior to</u> starting the LSC. Depending upon the state, dealerships also may be subject to restrictions on the number of vehicles to which the LSC materials can be applied in any single day, week or month. Please refer to the Getting Started Guide and the Federal, State and Local Requirements Guide that accompany these Technical Instructions for important information about any such approvals or restrictions that may apply to your dealership. Your dealership must adhere strictly to these requirements.



Due to the flash point of the NOX-RUST® materials, allow sufficient time for the vehicle (i.e., the exhaust system) to cool down before beginning the application process. By following the FRAME APPLICATION WORK PROCEDURE the vehicle will have additional time to cool before the NOX-RUST® is applied. Please refer to the MSDS for flash point temperatures.

A. WORK AREA SETUP (SUGGESTED)

1. INITIAL SETUP CONSIDERATIONS & GUIDELINES

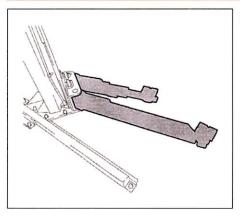
- a) Work with your Service Manager to locate a dedicated work area and lift with the following requirements.
 - i. In well ventilated area.
 - ii. Away from other vehicles to minimize the possibility of overspray.
 - iii. In a location that can be sectioned off by partitions.
 - iv. In an area that provides sufficient distance from neighboring stalls*

Please note area set up may vary depending on dealership layout. The following information is just one example of how an area might be set up for frame Corrosion-Preventative Compound application. Be sure to work with your Service Manager when locating a dedicated work area. If more assistance is needed, please contact your regional representative.

*The X-128T has a vanilla scent added that may be noticeable by others working around the spray area. Toyota is currently working to remove the vanilla scent in the near future.



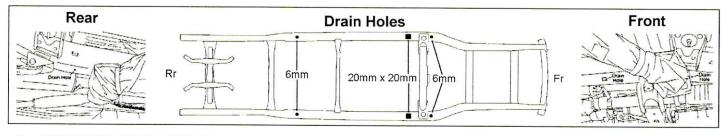
Important Reminder: Because of specific fire code requirements, make sure to review the Site Selection Section of the Dealer Information Packet to ensure that the area where you will conduct the LSC is compliant with the appropriate requirements.



2. MASK THE LIFT SWING ARMS

- a) Cover the lift swing arms with fire-retardant poly sheeting (tarp).
- b) Secure the tarp with masking tape.

- A two post lift swing arm is shown for reference purposes.
- Inspect the tarp on a daily basis for damage (cuts, tears, etc.) and replace as necessary.
- Dispose of old tarps in the same manner as other regulated waste at your dealership. Refer to the Dealer Information Packet for more info.



3. PREPARE THE VEHICLE

- a) It may be necessary to pressure wash the vehicle's frame, depending on its cleanliness.

 Please note that time has been allotted to pressure wash the frame in the flat rate time.
- b) Place the vehicle on the lift and raise it up.

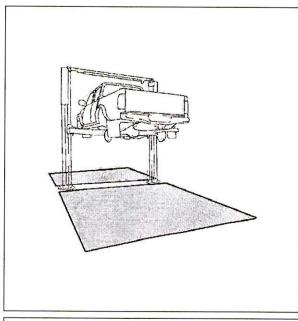
NOTE:

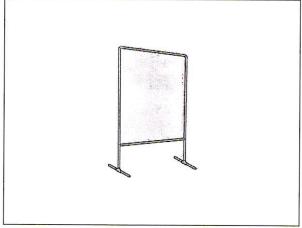
DO NOT cover the frame's drain holes when positioning the swing arms (see illustration above).

- c) Remove the rear wheels.
- d) Remove the spare tire.
- e) Remove the engine under cover.
- f) Cover any identifying label (i.e., VIN label, etc.) on the frame with tape.
- g) Cover the driveshaft(s) with fire-retardant poly sheeting (tarp) and secure with masking tape.

NOTE:

Overspray onto the driveshaft may cause vehicle vibration.





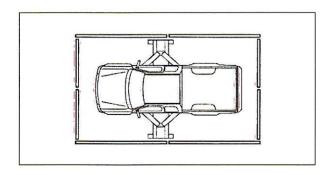
4. WORK AREA SETUP

- a) Cover any exposed section(s) of the lift with fireretardant poly sheeting (tarp), and secure with masking tape.
- b) Place the tarp(s) beneath the vehicle as shown in the illustration to protect the floor.

NOTE:

- When laying out the tarp on the floor, be sure it is secure and does not create a slipping hazard when walked upon.
- Inspect the tarp on a daily basis for damage (cuts, tears, etc.) and replace as necessary.
- Dispose of old tarps in the same manner as other regulated waste at your dealership. Refer to the Dealer Information Packet for more info.
- A two post lift swing arm is shown for reference purposes.
- Setup partitions according to the facility needs of your dealership.

- The type, size and number of partitions used will depend on each dealer's facility.
- Partitions should minimize any overspray to nearby stalls, while ensuring adequate ventilation.
- Inspect the partition(s) on a daily basis for damage (cuts, tears, etc.) and repair/replace as necessary.
- Dispose of used partitions in the same manner as other regulated waste at your dealership. Refer to the Dealer Information Packet for more info.

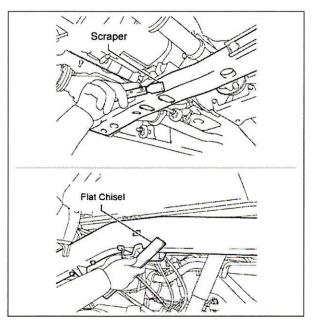


d) Position the partitions around the vehicle to prevent overspray, as shown in the illustration.

NOTE:

- The partitions shown are just an example of what can be used.
- A two post swing arm lift is shown for reference purposes.

B. RUST REMOVAL PROCESS



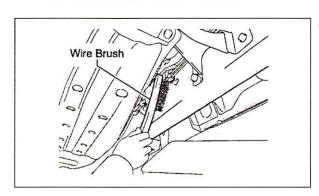
1. REMOVE THE FRAME RUST

a) Remove the rust from the frame using a scraper and/or flat chisel.

NOTE:

- DO NOT scratch or remove the identifying labels (i.e., VIN label, etc.) from the frame.
- Make sure to wear protective eyewear, gloves and a dust mask when performing this step.
- Please reference the laminated flowchart for pictures illustrating the frame's appearance before and after the rust removal process.

C. CLEANING THE FRAME



Air Nozzle

1. CLEANING THE FRAME

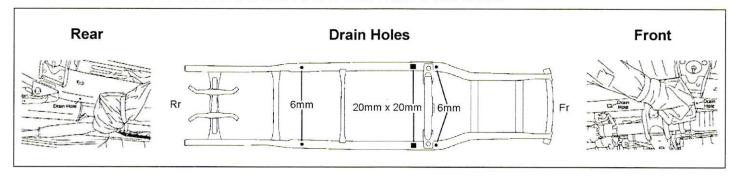
a) Using a wire brush, remove any debris and/or rust from the frame.

NOTE:

- DO NOT scratch or remove the identifying labels (i.e., VIN label, etc.) from the frame.
- Make sure to wear protective eyewear, gloves and a dust mask when performing this step.
- b) Using an air nozzle, remove any dirt, debris, rust flakes and water residue from the frame.

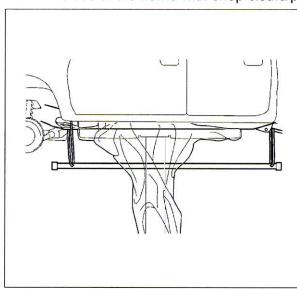
- Make sure to wear protective eyewear when performing this step.
- A slightly wet frame surface is acceptable when applying the frame Corrosion-Preventative Compound.

D. SPRAYING FRAME CORROSION-PREVENTATIVE COMPOUND



1. CLEAN OUT, THEN PLUG THE DRAIN HOLES

- a) Using a pick or small screwdriver poke 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 to remove any dirt or debris that may be lodged in the holes.
- b) 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.

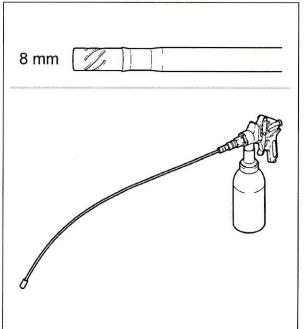


2. SETTING UP THE RAIN GUTTER (IF USED)

- a) Using the rain gutters and 4 end caps, create two 7 ft assemblies that will catch the frame Corrosion-Preventative Compound as it drips from the frame rails.
- b) Using wire, hang the 2 rain gutters beneath the drainage holes (3 per frame rail) on the left and right frame rails as shown in the illustration.

NOTE:

- DO NOT hang the rain gutters from the frame.
- If rain gutters are not used, please place buckets under the drainage holes (3 per frame rail).
- Locate any other location(s) on the frame rails where dripping may occur. Place a bucket under these locations.



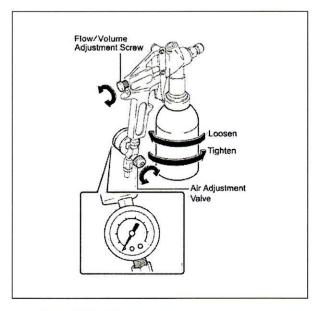
3. SETTING UP THE SPRAY GUN FOR NOX-RUST® 712AM INTERNAL FRAME APPLICATION NOTE:

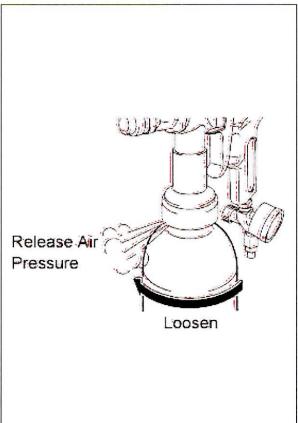
Use a dedicated spray gun for the NOX-RUST® 712AM (712AM) internal frame application.

- a) Check the temperature of the 712AM. If the 712AM is below 72° F, place the 712AM container in a bucket of hot water (<104° F) for 15 minutes and allow it to warm so the proper viscosity is achieved. Then shake the 712AM container well so that the contents are mixed thoroughly, as settling may occur as it sits.
- b) Fill the dedicated bottle with 712AM, and attach the spray gun.
- c) Connect the spray gun to the air hose.
- d) Connect the 8 mm spray nozzle, as shown in the illustration.

NOTE:

DO NOT use the 6 mm spray nozzle.



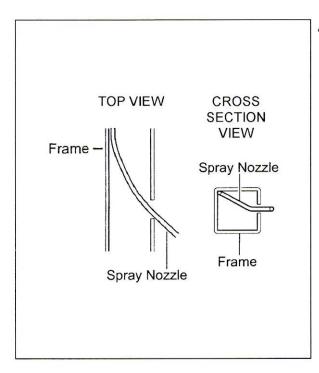


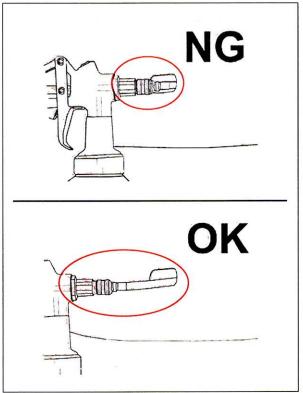
- e) Adjust the spray gun nozzle flow/volume. Turn the adjustment screw to the fully closed position (clockwise). Then loosen the adjustment screw 4 complete turns.
- f) Adjust the air pressure regulator. Place the nozzle in a clean empty box or pail and fully press the spray gun trigger, and adjust the air pressure to 72.5 psi. Recycle the amount sprayed out and use it during the application process.

NOTE:

- DO NOT bend the spray nozzle.
- Make sure to wear protective eyewear, impervious gloves (Viton, PVOH, etc.) and refer to the MSDS located in the Appendix when performing this step.
- g) During the 712AM internal frame application process it will be necessary to refill the spray gun after completing each frame rail. To do this, disconnect the air hose and slowly loosen the spray gun bottle until the internal air pressure is released out of the threads on the bottle's neck. Once the pressure has been released the bottle can be removed from the spray gun.

- DO NOT remove the spray gun bottle until the pressure has been released.
- DO NOT pull the spray gun trigger when the pressure has not been released, as doing so will cause the 712AM to backflow out of the air inlet.
- Just prior to filling the spray gun bottle with the 712AM, thoroughly shake the one liter kit container(s).
- Each frame rail requires one liter of 712AM. Make sure to use the entire first liter on the first frame rail, and the entire second liter on the second rail.
- Make sure to pour and use all residual 712AM that may remain in the one liter kit containers.





4. NOX-RUST® 712AM INTERNAL FRAME APPLICATION

- a) Insert the spray nozzle into the selected holes located throughout the frame. Begin at the front of the vehicle on the right frame rail. Reference the next two pages for the locations of each hole.
- b) Insert the nozzle so it contacts the upper edge of the opposite side (see illustration), and push it in a specified distance as shown on the next two pages.
- c) Start applying the 712AM inside the frame rail, and slowly pull the nozzle out at 0.3 to 0.5 m/sec (depending on location) while spraying. For 712AM internal frame insertion point & depth, and application speed, reference the next two pages.

NOTE:

- . DO NOT bend (i.e., kink) the spray nozzle.
- Make sure to wear protective eyewear, chemical resistant gloves (Viton, PVOH, etc.) and refer to the MSDS located in the Appendix when performing this step.

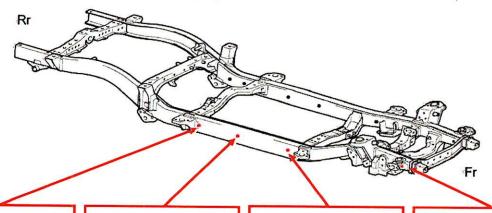
NOTE:

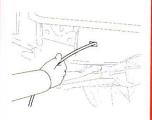
 Make sure the quick coupler on the spray gun does not come into contact with the frame when applying the 712AM. Contacting the frame with the quick coupler may lead to a hose disconnection.

NOX-RUST® 712AM INTERNAL FRAME APPLICATION (CONTINUED...) OUTBOARD FRAME RAIL NOZZLE INSERTION POINT & DEPTH, AND 712AM APPLICATION SPEED

NOTE:

- Follow all MSDS guidelines for the 712AM which can be found in the Appendix.
- · Only outboard rail nozzle insertion points are shown. See following page for inboard rail nozzle insertion points.
 - Only one side is shown. Outside frame rail nozzle insertion points 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.
 - Follow the application speed directions to apply the sealant to the inside of the frame rail.
- Make sure to wear protective eyewear, chemical resistant gloves (Viton, PVOH, etc.) and refer to the MSDS located
 in the Appendix when performing this procedure.
 - The exact insertion point locations may vary depending on the cab configuration.
 - Tape can be placed on the spray nozzle to reference correct insertion depth.

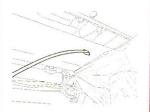




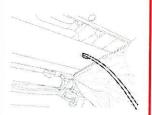
- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)



- 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)



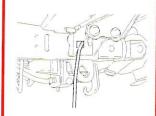
- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)



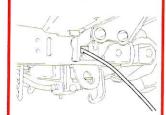
- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)



- 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)

Note: m/sec = meters/second

NOX-RUST® 712AM INTERNAL FRAME APPLICATION (CONTINUED...) INBOARD FRAME RAIL NOZZLE INSERTION POINT & DEPTH, AND 712AM APPLICATION SPEED

- Follow all MSDS guidelines for the 712AM which can be found in the Appendix.
- Only inboard rail nozzle insertion points are shown. See the previous page for the outboard rail insertion points.
 - Only one side is shown. Inside frame rail nozzle insertion points 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.
 - Follow the application speed directions to apply the sealant to the internal surface of the frame rail.
- Make sure to wear protective eyewear, chemical resistant gloves (Viton, PVOH, etc.) and refer to the MSDS located in the Appendix when performing this procedure.
 - The exact insertion point locations may vary depending on the cab configuration.
 - Tape can be placed on the spray nozzle to reference correct insertion depth.



- 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) to seal internal surfaces



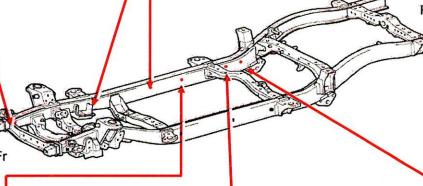
- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec)

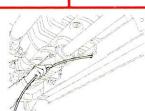


- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

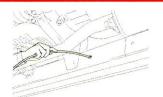


- Insert nozzle as far as it will go towards the rear of the frame.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

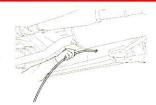




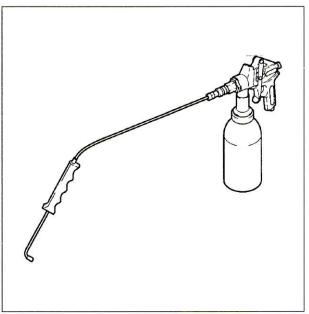
- Insert nozzle 5 cm (2 in.) into the frame.
- Apply the 712AM while turning the nozzle in a circular motion.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)

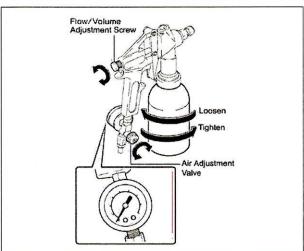


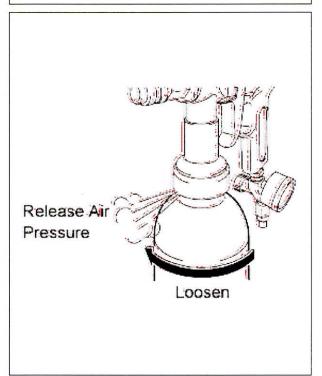
- Insert nozzle 5 cm (2 in.) into the frame.
- Apply the 712AM while turning the nozzle in a circular motion.
- Slowly pull out the nozzle at an application speed of 0.3 m/sec (12 in/sec)



- 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)
- This area may be very tight.







5. SETTING UP THE SPRAY GUN FOR NOX-RUST® X-128T EXTERNAL FRAME APPLICATION

NOTE:

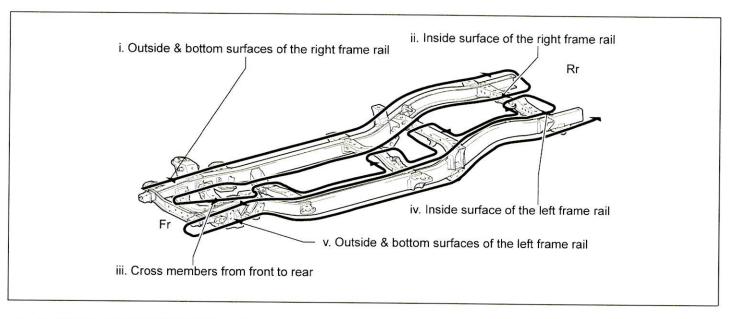
Use a dedicated spray gun for the NOX-RUST® X-128T (X-128T) external frame application.

- a) Check the temperature of the X-128T. If the X-128T is below 72° F, place the X-128T container in a bucket of hot water (<104° F) for 15 minutes and allow it to warm so the proper viscosity is achieved. Shake the X-128T container well so that the contents are mixed thoroughly, as settling may occur as it sits.
- b) Fill the dedicated bottle with NOX-RUST® X-128T, and attach the spray gun.
- c) Connect the spray gun to the air hose.
- d) Connect the external frame rail spray nozzle, as shown in the illustration.
- e) Adjust the spray gun nozzle flow/volume. Turn the adjustment screw to the fully closed position (clockwise). Then loosen the screw 4 full turns.
- f) Adjust the air pressure regulator. Place the nozzle in a clean empty box or pail and fully press the spray gun trigger, and adjust the air pressure to 50 psi. Recycle the amount sprayed out and use it during the application process.

NOTE:

- Make sure to wear protective eyewear, chemical resistant gloves (Viton, PVOH, etc.) and refer to the MSDS located in the Appendix when performing this step.
- g) During the X-128T external frame application process it will be necessary to refill the spray gun. To do this, disconnect the air hose and slowly loosen the spray gun bottle until the internal air pressure is released out of the threads on the bottle's neck. Once the pressure has been released the bottle can be removed from the spray gun.

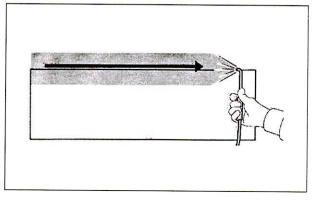
- DO NOT remove the spray gun bottle until the pressure has been released.
- DO NOT pull the spray gun trigger if the pressure has not been released, as doing so will cause the X-128T to backflow out of the air inlet.
- Just prior to filling the spray gun bottle with the X-128T, thoroughly shake the one liter kit containers.
- Apply all 3 liters of X-128T. If any X-128T is remaining it may be necessary to re-spray some sections of the frame.
- Make sure to pour and use any residual X-128T that may remain in the one liter kit container.

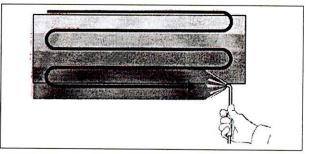


6. NOX-RUST® X-128T EXTERNAL FRAME APPLICATION

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

- a) Using a shop cloth, wipe off any 712AM that may be on external frame surfaces. If this is not done the X-128T may have difficulty adhering to these areas.
- b) Before beginning, please review the X-128T external frame application flow/order, as shown in the illustration above 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)



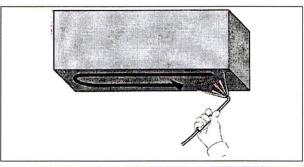


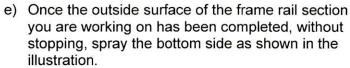
c) Start in the top left corner of the section you are spraying. Position the spray nozzle 20 to 25 cm (8 to 10 in.) away from the frame surface. Then apply the X-128T to the outside frame rail moving the nozzle at a constant speed of 0.1 m/sec (4 in/sec).

NOTE:

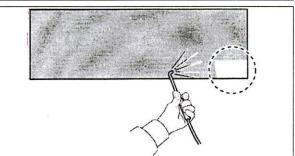
Make sure to wear protective eyewear, chemical resistant gloves (Viton, PVOH, etc.) and refer to the MSDS located in the Appendix when performing this step.

d) Without stopping, move down and reverse direction as shown in the illustration until the section is completed. Slightly overlap each pass by 1.3 cm (0.5 in.) so no gaps appear.





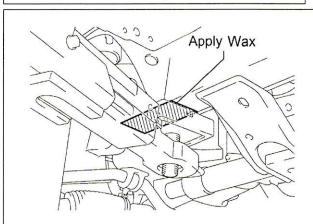
Spray the remaining frame and cross member surfaces in the same manner.

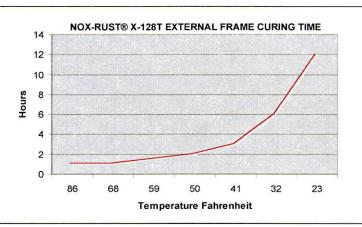


g) After the entire frame has been completed, inspect and spray any areas that may have been missed.

NOTE:

Wipe off any X-128T overspray from the exhaust components.





- h) Unplug the 3 drain holes (20 mm x 20 mm & two 6 mm), allowing the 712AM to drip out of the frame and onto the rain gutter assembly (if used), bucket or other container.
- i) Remove the tarp from the driveshaft.
- j) Reinstall the engine under cover.
- k) Reinstall the rear tires and torque to specification as outlined in the appropriate repair manual.
- I) Reinstall the spare tire.
- m) Remove the rain gutter assemblies (if used), bucket or other container.
- n) Lower the vehicle to the ground.
- Remove any rust from the area of the frame that was covered by the lift points. Clean this area and apply the X-128T.
- p) Make sure that both liters of the 712AM and all 3 liters of the X-128T have been applied. If any remains it may be necessary to re-spray some sections of the frame.

NOTE:

Make sure to wear protective eyewear, chemical resistant gloves (Viton, PVOH, etc.) and refer to the MSDS located in the Appendix when performing this step.

- q) Remove the tape covering the identifying labels (i.e., VIN label, etc.) on the frame.
- r) Allow the vehicle to cure for the specified time based on the ambient temp. (Refer to chart above).
- s) After the vehicle has cured for the correct amount of time and before the customer picks up the vehicle, insert a plug (P/N 90950-01539) into each of the 20 mm x 20 mm hole.
- t) Place a Corrosion-Preventative Compound Information Hang Tag on the rearview mirror.

7. STORING THE SPRAY GUN (Spray Guns do not require cleaning if they are properly stored)

- a) Spray Gun Storage (when the spray guns are not in use follow the procedure outlined below)
- 712AM Internal Frame Application Spray Gun:
 - Remove the air hose from the spray gun.
 - Loosen the spray gun from the canister to release the air pressure. To minimize exposure to the air, once the air pressure is released retighten the spray gun to the canister.
 - Leave the spray nozzle on the spray gun and place the originally equipped nozzle cap on the tip.
- X-128T External Frame Application Spray Gun:
 - Remove the air hose from the spray gun.
 - Loosen the spray gun from the canister to release the air pressure. To minimize exposure to the air, once the air pressure is released retighten the spray gun to the canister.
 - Leave the spray nozzle on the spray gun and wrap the nozzle end in a plastic sheet. Fasten the plastic (Saran Wrap) sheet with a rubber band.

8. RECORD-KEEPING AND OTHER REQUIREMENTS

- a) IMPORTANT: Most states have specific record-keeping requirements that apply to the LSC. Please refer to the Air Regulation, Air Recordkeeping Sections of the Federal, State and Local Requirements Guide for additional information and to make sure that your dealership can satisfy these legal requirements before starting the LSC.
- b) Some states and/or localities impose additional requirements, such as fire code permitting obligations. Please refer to the Federal, State and Local Requirements Guide for additional information and to make sure that your dealership can satisfy these legal requirements before starting the LSC.

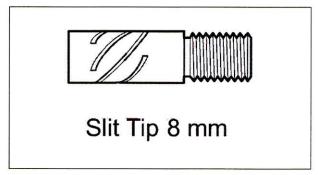
VII. APPENDIX

A. NOX-RUST® 712AM & NOX-RUST® X-128T DISPOSAL

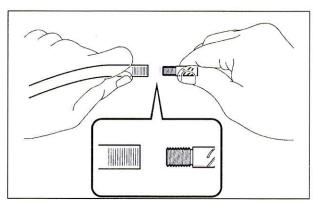
The NOX-RUST® 712AM & NOX-RUST® X-128T used in the application of the frame Corrosion-Preventative Compound as well as any materials, such as tarps with residue, must be disposed of in the same manner as other regulated hazardous waste at your dealership and in accordance with all applicable local, state, and federal regulations. Please refer to the Dealer Information Packet for additional information.

B. REPLACEMENT OF 712AM APPLICATOR NOZZLE

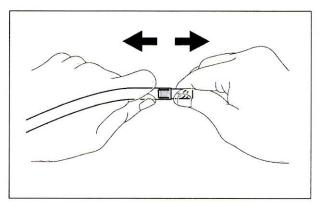
1. REMOVE AND INSTALL SLIT TIP



In the event the tip separates from the hose, follow these procedures for repair.

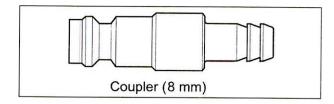


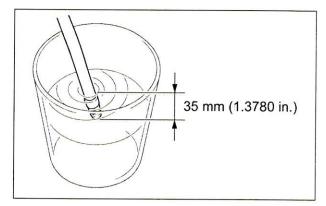
- a) Twist and remove the slit tip from the nozzle hose.
- b) Screw the slit tip onto a **NEW** nozzle hose at the slit tip connection



c) Holding both the slit tip and the nozzle hose pull to ensure the tip is securely attached.

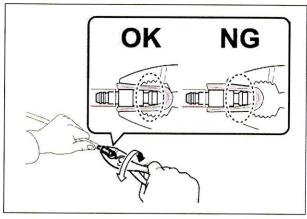
2. REMOVE AND INSTALL COUPLER (for 8mm)





 a) Immerse the entire coupler in 70°C (158° F) or hotter water for 10 seconds. This will loosen the coupler and allow it to be removed more easily.

WARNING: Wear insulated gloves, as the water is hot.

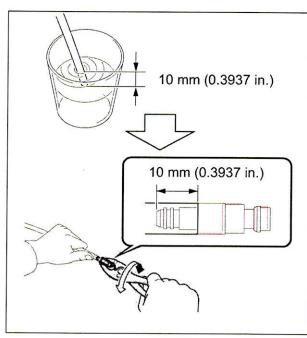


b) Immediately after removing the coupler from the hot water, twist and remove the coupler from the nozzle hose using pliers and a paper towel.

Note:

- Place the paper towel between the pliers and the coupler to avoid damaging the coupler.
- Be careful to place the pliers so as to not damage the connection joint for the spray guns.
- The coupler and nozzle hose may be hot.
- c) Hold and remove coupler.
- d) Immerse approximately 10mm (0.3937 in.) of the coupler connection (non-threaded) end on a NEW nozzle hose in 70°C (158°F) or above hot water for 10 seconds.
- e) Immediately after removing the nozzle hose from the hot water, rotate and insert the coupler into the nozzle hose.

- The coupler should be inserted all the way into the nozzle hose to ensure it will not detach.
- Re-immerse the nozzle hose into hot water if the nozzle hose cools and the coupler cannot be inserted.
- · The coupler and nozzle hose may be hot.
- f) Once the nozzle hose has cooled to room temperature, hold both the coupler and nozzle hose and pull to ensure that the coupler does not detach.



C. MSDS SHEETS

•	NOX-RUST® 712AMpa	age	27
_	NOV DUCTO V 120T	~3~	
•	NOX-RUST® X-128Tpa	age	31

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	В

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	5-10	ACGIH TLV: 2 mg/m ³	
CAS #64742-42-3		OSHA PEL: 2 mg/m ³	
Petroleum distillates, solvent dewaxed heavy paraffinic	5-15	ACGIH TLV: 5 mg/m ³	
CAS #64742-65-0		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	

Page 1 of 4

NOX-RUST® 712AM MSDS (CONTINUED...)

Soybean oil polymer with isophthalic

0.4-4

Not established

acid and pentaerythritol

CAS# 66071-86-1

Castor oil, dehydrated, polymerized

5-15

Not established

CAS# 68038-02-8

Calcium Carbonate CAS #471-34-1 5-10

OSHA PEL: 5 mg/m³ (respirable fraction)

OSHA PEL: 15 mg/m³ (total dust)

ACGIH TLV: 10 mg/m³ (^[2] nuisance dust)

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

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

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

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

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

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

3/11/2009

Page 2 of 4

¹²¹ This component poses a hazard only if a dust is formed, i.e., by sawing, sanding, drilling, etc.

NOX-RUST® 712AM MSDS (CONTINUED...)

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):

<<!

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.

Nox-Rust 712AM

3/11/2009

Page 3 of 4

NOX-RUST® 712AM MSDS (CONTINUED...)

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%

RO/TPO 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.

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: Material Usage: Petroleum Solvent/Additive Blend 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	40-50	OSHA PEL: 100 ppm
CAS #64742-88-7 and/or #64742-47-8		ACGIH TLV: 100 ppm
and/or #8052-41-3		ACGIH STEL: 200 ppm
Petroleum Hydrocarbon (Petrolatum)	20-25	OSHA PEL: 2 mg/m ³
CAS:#8009-03-8		ACGIH TLV: 2 mg/m³ (for fumes)
Petroleum Wax	6-10	OSHA PEL: Not Established
CAS #64742-42-3		ACGIH TLV: 2 mg/m³(fumes)
[1]Calcium Carbonate	2-4	OSHA PEL:5 mg/m³(respirable fraction)
CAS #1317-65-3		OSHA PEL: 15 mg/m³(total dust)
and/or CAS #471-34-1		ACGIH TLV:10 mg/m ³ (^[2] nuisance dust)
[1]Carbon Black	< <u>1</u>	OSHA:PEL: 3.5 mg/m ³ (^[2] nuisance dust)
CAS #1333-86-4		ACGIH TLV: None Established

¹¹See Section 3.

^[12] This component poses a hazard only if the liquid dries and a dust is formed.

NOX-RUST® X-128T MSDS (CONTINUED...)

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

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

Unusual Fire/Explosion Hazards: 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.

NOX-RUST® X-128T MSDS (CONTINUED...)

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 >300°F

Boiling Point (initial): 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.

NOX-RUST® X128T [1384]

12/4/08

PAGE 3 OF 4

NOX-RUST® X-128T MSDS (CONTINUED...)

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

DELAYED (CHRONIC)

EPA Hazard Category (40CFR Part 370):

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 NONE

CAS NO. WT%

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%

40-50

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 100

Aliphatic Petroleum Solvent

64742-88-7,

64742-47-8,

8052-41-3

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

14808-60-7

.03 max

(Naturally occurring in mined calcium carbonate)

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.

NOX-RUST® X128T [1384]

12/4/08

PAGE 4 OF 4

2001 through 2004 Model Year Tacoma Frame Rust Perforation Warranty Enhancement Notification

[VIN]

Dear Toyota Owner:

At Toyota, we are dedicated to providing vehicles of outstanding quality and value. As part of our continual efforts to meet your product expectations, Toyota will offer an extension to portions of your vehicle's (VIN noted above) New Vehicle Limited Warranty as it applies to your vehicle's frame.

What is the condition?

Toyota has received reports that a small number of 2001 through 2004 model year Tacomas operated in severe cold climate areas with high road salt use exhibited excessive rust to the frame, causing perforation of the metal. Toyota investigated these reports and determined that the frames in these vehicles may not have adequate corrosion-resistant protection for use in this environment. This combined with prolonged exposure to road salts and other environmental factors may contribute to the development of excessive rust in the frames of some vehicles. This condition is unrelated to and separate from normal surface rust which is commonly found on metallic surfaces after some years of usage and/or exposure to the environment.

What will Toyota do?

Although the vehicle's frame is covered by Toyota's New Vehicle Limited Warranty for 3 years or 36,000 miles (whichever comes first), we at Toyota care input your overall experience with and confidence in your vehicle. To assure you that we stand behind our product, we will extend the warranty coverage, to a total of fifteen years/unlimited mileage, on your vehicle? If any for his specific condition, subject to the terms and conditions of this Letter. Please see the "What Should I Do?" and "warranty Enhancement Details" section of this letter for limitations and details.

What should I do?

If your vehicle is registered in the tollowing states or the District of Columbia:

• CT, DE, IL, IN, KY, MA, MI), MA, MI, MN, NH, NJ, NY, OH, PA, RI, VA, VT, WI, WV

Toyota will inspect the condition of your vehicle's frame and apply a corrosion-resistant treatment. This treatment will enhance the corrosion protection of your Tacoma's frame against severe cold climate conditions and high road salt exposure. Any Toyota dealer located in the states listed above will be happy to conduct this inspection and treatment at **no charge** until **10/31/2010**. Please note that completion of this service before the expiration date is a condition of maintaining the extended warranty if your vehicle is registered in one of these states.

Please contact the Toyota dealer and make an appointment to have your Tacoma's frame inspected and a corrosion-resistant treatment applied before **10/31/2010**. Please present this Letter to the Toyota dealer at your appointment. The treatment may take one or two days. During the corrosion-resistant treatment process, your Toyota dealer will arrange for a complimentary loaner vehicle (upon proof of adequate insurance) for your use at no charge while the vehicle is being treated.

Because the extended warranty is for a total of fifteen years, it may be necessary to re-inspect and retreat vehicles operated in areas where such prolonged exposure to road salts and other applicable environmental factors exist. Toyota will notify you if this is necessary.

If your vehicle is registered in the following states:

AK, AL, AR, AZ, CA, CO, FL, GA, HI, IA, ID, KS, MT, LA, MO, MS, NC, ND, NE, NM, NV, OK, OR, SC, SD, TN, TX, UT, WA, WY and U.S. Territories

You do not need to do anything at this time. Please insert this Letter into your Toyota Owner's Manual Supplement or Owner's Warranty Information booklet or in the vehicle's glove box for future reference.

If you move to an area in which your vehicle may experience prolonged exposure to road salts and other environmental factors, please contact any Toyota dealer and make arrangements to have your vehicle inspected and, if appropriate, treated.

What if perforation of the vehicle's frame caused by rust exists on my vehicle?

If your Tacoma's frame is perforated by rust, contact any Toyota dealer and make arrangements to have your vehicle inspected. Please present this Letter to the Toyota dealer when you bring the vehicle in for your appointment.

After inspection and confirmation of the perforation condition, Toyota will repair the frame according to the perforation level and, if necessary, apply the corrosion-resistant treatment to prevent rust advancement.

Based upon the condition of your specific vehicle and replacement parts/frame availability, Toyota may determine to repurchase your vehicle rather than to repair it. If we decide to repurchase your vehicle, we will offer the following:

• Toyota will repurchase the vehicle at the lower of the original MSRP when the vehicle was first offered for sale by Toyota or the total amount of 1.5 times the Kelley Blue Book® Suggested Retail Value. If KBB valuation is used, the subject vehicle will be assessed, based on the actual mileage and zip code at the time of inspection, as a vehicle in excellent condition regardless of the vehicle's actual condition, subject to the terms and conditions set forth below. The offer will be based on the terms and conditions stated in the Warranty Enhancement Details. In the event of a repurchase, your Toyota dealer will arrange a complimentary loaner vehicle (upon proof of adequate insurance) for your use at no charge for up to 30 days.

Warranty Enhancement Details

The warranty extension is offered for a period of 15 years with no mileage limitations from the vehicle's in service date, for perforation of the vehicle's frame valued by just, provided that you adhere to the terms and limitations specified in this letter.

This offer is limited to your specific vehicle whose with the loant fication Number (VIN) is printed in this letter and is subject to the same conditions set forth in the Very vehicle Limited Warranty section of your Owner's Manual Supplement or Supplement or Supplement of Supplement on Supplement or Suppl

This program is intended for individual customer support and only applies to warranty work performed at an authorized Toyota dealership.

What if I have previously paid for the repair of the vehicle's frame for this specific condition as it applies to my 2001 through 2004 model year vehicle?

If you have previously paid for repair of the frame on your vehicle (VIN noted in this letter) for this specific condition before receiving this Letter, please contact Toyota at 1-888-270-9371.

If you no longer own this vehicle or would like to update your vehicle ownership/contact information, please go to www.toyota.com/ownersupdate. You will need your full 17-digit Vehicle Identification Number (VIN) to input the new information.

We have sent this notice in the interest of your continued satisfaction with our products, and we sincerely regret any inconvenience this condition may have caused you.

Thank you for driving a Toyota.

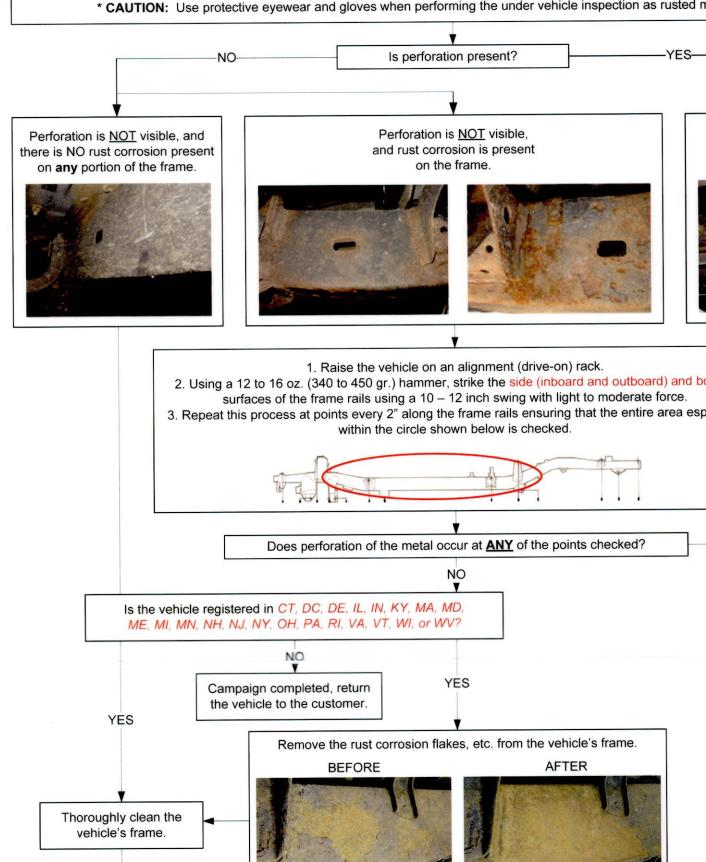
Sincerely, TOYOTA MOTOR SALES, U.S.A., INC

LSC 90D - 2001-2004 MODEL YEAR TACOMA FRAME PERFORATION INSPECTION AND OPERA

Before raising the vehicle on an alignment rack (or lift), visually inspect the **entire** frame asser (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 n



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

Important: When applying the 712AM corrosion preventive compound, adjust the spray gun air pressure to 72.5 psi.

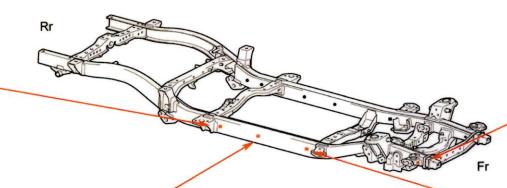
- Follow all MSDS guidelines for the 712AM corrosion preventive compound (sealant) which can be found in the technical instructions (TI).
- Only the outside frame rail nozzle insertion points are shown, see below for inside frame rail nozzle insertion locations.
- · The exact insertion point locations 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 resistanthe appendix of the TI when performing this procedure.
- Only one side is shown. Outside frame rail nozzle location
- Make sure to repeat the 712AM application on the opporare sealed.
- Tape can be placed on the spray nozzle to reference ins



- 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)





- 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)

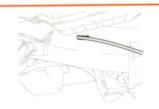


- Insert nozzle as far as it will go towards the front of the frame.
- Slowly pull out the nozzle at an application speed of 0.5 m/sec (20 in/sec)

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

Important: When applying the 712AM corrosion preventive compound, maintain a spray gun air pressure of 72.5 psi.

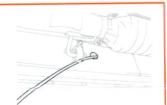
- Follow all MSDS guidelines for the 712AM which can be found in the technical instructions.
- Only the inside frame rail nozzle insertion points are shown, see the previous section for outside frame rail nozzle insertion locations.
- The exact insertion point locations may vary depending on the cab configuration.
- · Follow the application speed directions to apply the sealant inside of the frame rail.
- · Only one side is shown. Inside frame rail nozzle lo
- Make sure to wear protective eyewear, chemical r located in the appendix of the TI when performing
- Make sure to repeat the 712AM application on the have sealant applied.
- · Tape can be placed on the spray nozzle to refere



- 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)



- 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)



 Insert nozzle as far as it will go towards the rear of the frame.

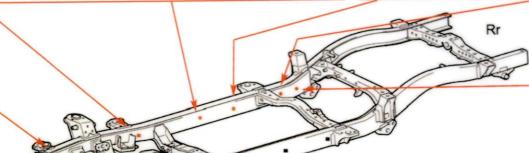


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TOYOTA

TO: MARYLAND STATE TOYOTA DEALER PRINCIPALS, SERVICE AND PARTS MANAGERS

DATE: 2009

RE: Information Packet for LSC 90D

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

MARYLAND 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. <u>"Getting Started Guide"</u>: Gets you started by reviewing the steps your dealership should take to select an appropriate spraying space and comply with federal, state and local laws.
- 2. <u>"Federal, State and Local Requirements Guide"</u>: Reviews in more detail relevant federal, state and local laws. Also provides compliance tools.
- 3. <u>"Technical Instructions"</u>: Contains detailed technical instructions that you should follow at all times.

Assumptions for this Packet: Your dealership will conduct the LSC in an existing service area. If this assumption is incorrect, or if you need more information, 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.

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HOW TO IMPLEMENT THE LSC

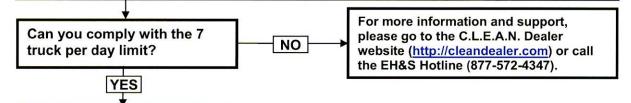
Step 1: Select an Appropriate Spraying Space to Conduct the LSC

To ensure that the LSC is conducted in compliance with all applicable regulatory requirements, you need to select an LSC work area that meets certain minimum requirements. Go to the Site Selection Section for more information.

<u>Step 2</u>: For LSC Operations at your Dealership to Remain Exempt from Air Permitting, <u>YOU MUST NOT PROCESS MORE than 7 Tacomas per day.</u>

The Maryland Department of the Environment has issued a conditional approval for the LSC exempting it from air permitting requirements as long as (i) your total Volatile Organic Compound emissions from the LSC do not exceed 20 pounds per day and (2) the LSC concludes by December 31, 2010.

You should be able to comply with these limits as long as you <u>DO NOT PROCESS</u> more than 7 trucks per day and you conclude the LSC by October 31, 2010 as scheduled.



<u>Step 3</u>: 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 <u>Fire, Building and Zoning Codes Section</u> of **Federal, State and Local Requirements Guide** for compliance and contact information.

AFTER COMPLETING STEPS 1-3 YOU ARE READY TO APPLY LSC MATERIALS

But, you must follow the **Technical Instructions**, complete the **LSC 90D Readiness Survey** (to receive the spray equipment), and Step 4 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 that you have completed all LSC preparation steps.

Step 4: Keep Air Permitting Exemption Records.

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

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

MARYLAND DEALER INFORMATION PACKET GETTING STARTED GUIDE

Where Will You Conduct The LSC? This Guide assumes your dealership will conduct the Limited Service Campaign (LSC) in an existing service area.

If this 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).

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

- <u>BEFORE</u> beginning the LSC (see <u>Steps 1, 2 and 3</u> below); and
- WHILE conducting the LSC (see <u>Step 4</u> below).

<u>STEP 1</u> – <u>BEFORE</u> YOU BEGIN APPLYING LSC MATERIALS, PLEASE SELECT AN APPROPRIATE SPRAYING SPACE

To ensure that the LSC is conducted in compliance with all applicable regulatory requirements, you need to select an LSC work area that meets certain minimum requirements. Go to the <u>Site Selection Section</u> for more information.

<u>STEP 2</u> – <u>BEFORE</u> YOU BEGIN THE LSC, CONFIRM YOUR DEALERSHIP CAN STAY EXEMPT FROM AIR PERMITTING REQUIREMENTS

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.

The Maryland Department of the Environment (MDE) has determined that LSC operations at your dealership are exempt from a permit so long as the following requirements are met:

- 1. YOUR DEALERSHIP DOES NOT PROCESS MORE THAN 7 TRUCKS PER DAY, SO THAT THE LSC'S EMISSIONS OF VOCS DO NOT EXCEED 20 LBS PER DAY; AND
- 2. THE LSC IS COMPLETED AT YOUR DEALERSHIP ON OR BEFORE DECEMBER 31, 2010.

(STEP 2 CONT'D ON NEXT PAGE)

STEP 2 (Cont'd)

Can I do more than 7 vehicles per day? No, unless you want to apply for an air permit. MDE's conditional approval for the LSC exempts it from air permitting requirements as long as (i) you do not process more than 7 trucks per day, so that total VOC emissions from LSC operations at your dealership do not exceed 20 lbs/day, and (2) the LSC concludes by December 31, 2010. If you want to exceed either of these limits, you will have to apply for and obtain an air permit from MDE. But, please note that the air permitting process may take 90 days or longer and, although the state would likely issue a permit that allows you to do more trucks, the state also may impose additional legal requirements on your dealership as part of that air permit.

Should I Be Concerned About The December 31, 2010 Deadline? The LSC is scheduled to conclude by October 31, 2010; therefore, you will have completed the LSC by MDE's deadline.

How Can I Learn More? Go to the <u>Air Regulations</u> and <u>Air Recordkeeping Sections</u> of the **Federal, State and Local Requirements Guide**, or go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

STEP 3 – BEFORE YOU BEGIN APPLYING LSC MATERIALS, CONTACT YOUR LOCAL FIRE OFFICIAL FOR APPROVAL OF 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 can apply. The <u>Fire, Building and Zoning Codes Section</u> of the **Federal, State and Local Requirements Guide** reviews these important requirements, but in summary, <u>prior to starting the LSC, you must</u>:

1. CONTACT YOUR LOCAL FIRE OFFICIAL IN WRITING IN ORDER TO: (A) PROVIDE INFORMATION ABOUT THE LSC; AND (B) OBTAIN A FIRE PERMIT IF REQUIRED, OR CONFIRM THAT A FIRE 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. You will find a model letter and attachments that you need to provide to your local fire official in either Appendix A (all Maryland dealers, except City of Baltimore) or Appendix B (dealers in City of Baltimore only) of the Fire, Building and Zoning Codes Section.

(STEP 3 CONT'D ON NEXT PAGE)

STEP 3 (Cont'd)

We recommend calling your local fire official to alert them that you will be sending this information. To avoid confusion, please make sure that after calling, you send the letter and all attachments contained in either Appendix A or B (as dictated by your dealership's location) so that the local fire official has more than your verbal description of the LSC.

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 <u>Fire, Building and Zoning Codes Section</u> for the information you need to confirm compliance regarding your dealership 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, 2 and 3, 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.

<u>BUT</u> make sure to (1) follow the detailed **Technical Instructions**, (2) process no more than 7 trucks per day, and (3) follow Step 4 (records for permit exemption). You should also review the **Federal**, **State and Local Requirements Guide** to better understand the legal requirements for Steps 1, 2, 3, and 4.

STEP 4 – KEEP AIR PERMITTING EXEMPTION RECORDS

You <u>must</u> maintain records demonstrating compliance with the permitting exemption conditions established by MDE, as outlined in Step 2. Go to the <u>Air Recordkeeping Section</u> of the **Federal**, **State and Local Requirements Guide** for more information and the necessary documentation.

COMPLIANCE NOTE REGARDING REGULATED WASTE: Waste produced as a result of the LSC operations may qualify as regulated hazardous waste (e.g., excess LSC materials, clean up rags, etc.). However, the LSC is not expected to 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) because the quantities of regulated waste generated by the LSC operations should be relatively small assuming that:

1. You store the spray guns properly when they are not in use as described in the Technical Instructions (so that the spray guns do not need to be cleaned, which would generate waste); and

2. You reuse the LSC tarps (floor coverings) and work area partitions (so as to avoid frequent disposal of these items which would generate larger quantities of waste, which may impact your generator status).

If you do these things, then the only regulated waste produced by the LSC would consist of rags used to clean the LSC work area and any excess quantities of the LSC materials; you should handle these items in the same manner as other regulated waste at your dealership. 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).

COMPLIANCE NOTE REGARDING RESPIRATORY PROTECTION: The Material Safety Data Sheets (MSDSs) for both LSC materials recommend that employees handling these materials should use a NIOSH-approved respirator to control exposures to organic vapor and mist in work areas where ventilation is inadequate. If you have any questions regarding these requirements or how to obtain and use a NIOSH-approved respirator, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) and review the "Respiratory Protection FAQ" or call the EH&S Hotline (877-572-4347).

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 and occupational health and safety laws and regulations that might apply to non-LSC operations at your dealership. We assume that you already comply with these 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).

Thank you for your participation and cooperation in the 2001-2004 Tacoma Limited Service Campaign.

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

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

MARYLAND DEALER INFORMATION PACKET SITE SELECTION SECTION

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

As explained in other Sections, the LSC is subject to various legal requirements that impose certain operational limitations on it, including requirements related to the location where it will be conducted. Therefore, careful selection of your LSC work area is important to ensure your compliance with those requirements and to help expedite regulatory approvals (e.g., from your local fire official). *The purpose of this Section is to help you select an LSC work area.*

SITE SELECTION CONSIDERATIONS

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

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

Note: The information in this package is not intended to cover building, zoning, mechanical or other environmental or occupational health and safety 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.

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

- a) Adequate ventilation (whether natural or mechanical);
 - Consideration should be given to: (1) locations/stalls near bay doors, other natural ventilation and/or areas with approved mechanical ventilation, and (2) where possible, locations at the end of a row of service bays and not in the middle.
- b) Be at least 20 feet from: (1) open flames and/or spark-producing equipment and appliances; and (2) any drying, curing, and/or fusion apparatus;
- The LSC should be the only spraying operation conducted in the LSC work area and it must be located away from pits or other below-ground areas;
- d) The LSC work area must have: (1) a suitable lift that allows clear access to the vehicle's frame rails, and (2) a non-combustible floor (e.g., concrete) (if the floor is combustible (see footnote 1 below);¹
- e) A Type 1-4-A rated or a 2-2.5 gallon water-type fire extinguisher located within 75- feet of LSC operations (even if the LSC work areas has an automatic fire protection system);

If the LSC work area has a non-combustible floor (e.g., concrete), standard thin plastic sheeting may be used for clean up purposes on the floor in the LSC work area.

If the LSC work area has a combustible floor (e.g., wood), it must be covered with fire retardant sheeting (e.g., TRM 'WEATHER-ALL' Flame Retardant Film).

f) Compressed air;	g) Eyewash stations;
h) Drop lights appropriate for use during the spraying of combustible materials ; and	 i) Any other equipment, operational and/or building features required by applicable law or indicated in the Material Safety Data Sheets (MSDSs) for the LSC materials.

 ALL LSC WORK SHOULD BE CONDUCTED IN A PARTITION ENCLOSURE such as those depicted in the Technical Instructions, which separates the LSC from other vehicles and work areas/stalls.

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

OTHER REQUIREMENTS TO CONSIDER

Other Legal Requirements

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

LSC Material Storage

You <u>may not</u> store more than 25 gallons of combustible materials (including the LSC materials) in any fire area at your dealership. A fire area is any area in your dealership separated from the remainder of the building by construction and openings that have fire resistance ratings of at least 1 hour.

You <u>may only</u> exceed this 25 gallon limit if the materials are stored in a fire cabinet. If you are using a fire cabinet you may store up to 120 gallons in any one cabinet and have up to 3 cabinets in any one fire area at your dealership.

TOYOTA

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

MARYLAND 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 sealant materials 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 MARYLAND DEPARTMENT OF ENVIRONMENT (MDE) 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 find the information later 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 <u>Air Regulations Section</u> reviews the federal and state laws that will regulate air emissions from the LSC at your dealership.
- b) MDE has determined that LSC operations at your dealership will be exempt from air permitting as long as you comply with the conditions in MDE's September 2, 2009 condition approval letter (a copy of which is attached in the <u>Air Recordkeeping Section</u>), including in particular the following conditions:
 - (i) You do not process more than seven (7) trucks per day, so that emissions of all VOCs from the LSC only are less than 20 lbs per day; and
 - (ii) The LSC concludes by December 31, 2010.

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

2. "AIR RECORDKEEPING" SECTION

- a) The Air Recordkeeping Section contains the documents that your dealership will need to retain regarding the air emissions from the LSC. These records are necessary to comply with MDE's conditional approval of the LSC, other Maryland environmental regulations, and to ensure that your dealership can conduct the LSC and stay exempt from air permitting, and also can be used as records to demonstrate your dealership's compliance with the applicable requirements.
- b) As explained in the <u>Air Recordkeeping Section</u>, you must maintain these documents for five (5) years after the completion of the LSC.

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

- a) The <u>Fire, Building, and Zoning Codes Section</u> 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 all of the information 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.
- Appendix A or B (depending on the location of your dealership) to the <u>Fire, Building, and Zoning Codes Section</u> contain model letters 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. Appendices A and B also include a determination from the Maryland State Fire Marshal that the LSC is compliant with the State 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).
 - 1. <u>Appendix A</u> should be used by all dealers in Maryland, <u>EXCEPT</u> those located in the City of Baltimore.
 - 2. Appendix B is for dealers in the City of Baltimore ONLY.

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.

4. "REGULATED WASTE MANAGEMENT" SECTION

- a) The <u>Regulated Waste Management Section</u> 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) Waste produced as a result of the LSC operations may qualify as regulated hazardous waste (e.g., excess LSC materials, clean up rags, etc.). However, the LSC is not expected to 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) because the quantities of regulated waste generated by the LSC operations should be relatively small assuming that:
 - You store the spray guns properly when they are not in use as described in the **Technical Instructions** (so that the spray guns do not need to be cleaned, which would generate waste); and
 - 2) You reuse the LSC tarps (floor coverings) and work area partitions (so as to avoid frequent disposal of these items which would generate larger quantities of waste, which may impact your generator status).
- c) If you do the two items above, then the only regulated waste produced by the LSC would consist of rags used to clean the LSC work area and any excess quantities of the LSC materials. These materials should be handled in the same manner as other regulated waste 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 **Federal**, **State and Local Requirements Guide** is not intended to cover air, waste management, hazardous material, water or other environmental or occupational health and safety 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 2001 - 2004 MODEL YEAR TACOMAS

MARYLAND DEALER INFORMATION PACKET FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE AIR REGULATIONS SECTION

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.

Toyota Motor Sales, U.S.A., Inc. (TMS) has contacted the Maryland Department of the Environment (MDE) and explained the LSC and its air emissions. Based on this information, on September 2, 2009 MDE issued a conditional approval letter that states that the LSC is exempt from permitting as long as certain conditions are met. Your dealership should be able to conduct the LSC and comply with MDE's conditions, which exempt the LSC from permitting, IF you satisfy criteria A, B C, AND D below.

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)

LSC OPERATIONS AT YOUR DEALERSHIP WILL BE EXEMPT FROM AIR PERMITTING IF YOU:

A. CONDUCT THE LSC IN AN EXISTING AREA AT YOUR DEALERSHIP.

<u>Do I Have To Conduct The LSC In An Existing Service Area?</u> No, but if you plan to conduct the LSC at another location (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).

B. PROCESS NO MORE THAN SEVEN (7) TRUCKS PER DAY TO KEEP VOC EMISSIONS FROM THE LSC BELOW 20 LBS PER DAY.

The LSC emits 2.86 lbs of VOCs per truck; therefore, MDE has determined that you can do 7 trucks per day and remain below the 20 lbs per day limit.

C. COMPLETE THE LSC BY DECEMBER 31, 2010.

<u>Should I be concerned about the Decemeber 31, 2010 deadline?</u> The LSC is scheduled to be concluded by October 31, 2010; therefore, you will have completed the LSC by MDE's deadline.

D. KEEP CERTAIN RECORDS IN YOUR FILES FOR A PERIOD OF 5 YEARS AFTER COMPLETION OF THE LSC.

<u>Why Do I Have To Keep Records?</u> To demonstrate compliance with the conditions set by MDE exempting the LSC from air permitting requirements, and because other Maryland regulations require certain recordkeeping. Please see Subsection III below and the <u>Air Recordkeeping Section for more information</u>.

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

As noted above, TMS has obtained a Permit Determination from MDE confirming that LSC operations at your dealership are exempt from permitting, so long as the following conditions are met (Note: a copy of MDE's determination has been included in the Air Recordkeeping Section of this Guide):

- Consistent with the **Technical Instructions**, your dealership does all of the following:
 - a) Use only the LSC kits supplied by Toyota, and
 - b) Do not use more than 1 LSC kit per vehicle, and
 - c) Use only the Vaupel HSDR 3300 spray guns provided by Toyota, and
 - d) DO not clean the LSC spray guns when not in use; instead, wraps the tips and nozzles as described in the **Technical Instructions**:
- Your dealership ensures that total VOC emissions from the LSC are less than 20 lbs per day by not doing more than 7 trucks per day under the LSC (Note: the LSC results in emission of 2.86 lbs of VOC per truck).
- 3. The LSC is completed by December 31, 2010* at your dealership (*actual LSC expiration date is October 31, 2010); and
- 4. You keep records documenting
 - a) The number of days the LSC was conducted at your dealership; and

b) The total number of vehicles processed and LSC kits used each day under the LSC.

The <u>Air Recordkeeping Section</u> of this **Guide** contains a log designed to help you track this information.

- 5. You comply with Maryland's regulations governing sealants: The LSC anticorrosion sealant materials are subject to regulation as sealants under Maryland's Air Regulations. These regulations:
 - a) Limit the VOC content of the materials,
 - b) Require the manufacturer to put certain information on the product labels; and
 - c) Require end-users to track sealant use on a monthly basis.

The LSC materials and their container labels satisfy requirements 1 and 2, and TMS has provided forms in the <u>Air Recordkeeping Section</u> so that you can track your monthly usage of the LSC materials. (Note: These forms allow you to track the LSC materials, but please be advised that there may be other sealants at your dealership that are subject to these recordkeeping requirements). If you have any questions or need additional information, please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347).

III. AIR PERMITTING REQUIREMENTS: YOUR RECORDKEEPING OBLIGATIONS

The determination from MDE that the LSC is exempt from air permitting and other Maryland environmental regulations require your dealership to maintain certain records to demonstrate that you are complying with MDE's conditional approval for the LSC and those other requirements. The <u>Air Recordkeeping Section</u> of this Guide identifies these records and contains the logs and other materials that <u>should be kept in your dealership's files for a period of five (5) years after the completion of the LSC.</u>

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771-----

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

MARYLAND 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 after completion of the LSC.

Your dealership must maintain the documents and records listed below to comply with the conditions of the conditional approval letter issued by MDE and other applicable environmental regulations in Maryland (e.g., COMAR 26.11.35). As a result of these requirements, you are required to maintain the following records for a period <u>five years after the completion of the LSC:</u>

- A record of the days the LSC was conducted at your dealership, the number of vehicles processed and LSC kits used per day (use the "LSC Production Log" enclosed with this Section); and
- Records tracking the total quantity of LSC anti-corrosion sealant materials purchased by your dealership on monthly basis (use the attached "LSC Materials Purchase Log"); and
- 3. LSC Process Overview (see attached); and
- 4. LSC Equipment Manufacturer's Specifications; and
- Conditional Approval Letter from MDE regarding the LSC and its eligibility for a permit exemption; and
- 6. Material Safety Data Sheets for the LSC materials (NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements).

Notes:

- I. Items (1) and (2) are daily and monthly logs that need to be completed as you conduct the LSC at your dealership.
- II. You do not need to do anything with items (3) through (6) above other than keep these documents in your files. You may need to provide them if requested by a government agency.

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LSC Production Log

Instructions for Completing LSC Production Log

Follow these two steps to complete the LSC Production Log (see sample log below):

Step 1:

Enter the month in the space provide below.

Step 2:

For each day in a given month, enter the total number of trucks treated with both the LSC exterior material (X128T) and interior material (712AM) by your dealership in Column 1 and the total number of LSC kits used in Column 2. Only use ONE kit per vehicle.

Date: [Enter the month here: October, 2009	Column 1 Enter total number of trucks done per day.	Column 2 Enter total number of LSC kits used each day.
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	5	5
9	5	5
10	4	4
11	4	4
12	3	3
13	5	5
14	6	6
15	7	7

31	31	31

LSC Production Log

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LSC Production Log

Reporting Year:	Dealership name and address:	
emissions unit are BELOW exterior (X128T) and inte the LSC start and end da	ership uses this log to demonstrate that the total VOC emissions w 20 POUNDS PER DAY. To meet this limit, this dealership will not erior (712AM) anti-corrosion materials to more than 7 trucks pate at this dealership below. In addition, record the dates the LS table below. You must maintain this log in your files for 5 (fileSC.	ot apply LSC oer day. Record SC was conducted
If this dealership's daily the C.L.E.A.N. Dealer w	y usage of LSC materials exceeds this limit (7 trucks per da website (<u>http://cleandealer.com</u>) or call the EH&S Hotline (8'	y), please go to 77-572-4347).

<u>Date:</u> [Enter the month here:	Column 1 Enter total number of trucks done per day.	Column 2 Enter total_number of LSC kits used each day.
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		

LSC Production Log

<u>Date:</u> [Enter the month here:	Column 1 Enter total number of trucks done per day.	Column 2 Enter total_number of LSC kits used each day.
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		

LSC Materials Purchase Log

Instructions for LSC Materials Purchase Log

Follow the two steps below to complete the **Purchase Log** (see sample log below):

Step 2:

Enter the total volume of each LSC material purchased. Each kit has 2 liters of 712 AM. Multiply the number in Column 1 by 2 to get the number for Column 2. Each kit has 3 liters of X128. Multiply the number in Column 1 by 3 to get the number for Column 3.

Explanation of LSC Kit: Each LSC kit contains the following sealant materials:

- 2 liters of Nox-Rust® 712AM (VOC Content = 0.165 lbs/gal); and
- 3 liters of Nox-Rust® X128T (VOC Content = 3.5 lbs/gal).
- You MAY ONLY use ONE LSC kit per vehicle.
- The materials are applied as supplied are should not be thinned or mixed with any other materials.
- Nox-Rust is a registered trademark of Daubert Chemical Company. The 712AM product is manufactured by Parker Corporation, and the X128T is manufactured by Daubert Chemical Company.
- YOU MUST MAINTAIN the LOG below and the LSC materials' MSDSs for a period of 5 years from the conclusion of the LSC.

Month	Column 1 - Number of LSC Kits Purchased	Column 2 – Total Volume of 712AM Purchased (liters) Multiply the number in Column 1 by 2, and enter the result below.	Column 3 – Total Volume of X128T Purchased (liters) Multiply the number in Column 1 by 3, and enter the result below.
		2009	
September	20	40	60
October	10	20	30
November	15	30	45
December	10	20	30
	THE WALL TO STATE OF THE PARTY.	2010	
January	20	40	60
February	10	20	30
March	15	30	45

Step 1:

Enter number of LSC Kits

purchased for the month

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DC\1225273.10

LSC Materials Purchase Log

Dealership name and address:				

<u>Instructions</u>: This dealership uses this log to document the total volume of LSC materials purchased. <u>You must maintain this log in your files</u> <u>for 5 (five) years after the completion of the LSC.</u>

Explanation of LSC Kit: Each LSC kit contains the following sealant materials:

- 2 liters of Nox-Rust® 712AM (VOC Content = 0.165 lbs/gal); and
- 3 liters of Nox-Rust® X128T (VOC Content = 3.5 lbs/gal).
- · You MAY ONLY use ONE LSC kit per vehicle.
- The materials are applied as supplied are should not be thinned or mixed with any other materials.
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Month	Column 1 - Number of LSC Kits Purchased	Column 2 – Total Volume of 712AM Purchased (liters) Multiply the number in Column 1 by 2, and enter the result below.	Column 3 – Total Volume of X128T Purchased (liters) Multiply the number in Column 1 by 3, and enter the result below.
		2009	
September			
October			
November			
December			
		2010	
January			
February			
March			
April			

27

This record must be maintained for 5 years.

Duplicate as Necessary

LSC Materials Purchase Log

snip name and address:		

<u>Instructions</u>: This dealership uses this log to document the total volume of LSC materials purchased. <u>You must maintain this log in your files</u> <u>for 5 (five) years after the completion of the LSC.</u>

Explanation of LSC Kit: Each LSC kit contains the following sealant materials:

- 2 liters of Nox-Rust® 712AM (VOC Content = 0.165 lbs/gal); and
- 3 liters of Nox-Rust® X128T (VOC Content = 3.5 lbs/gal).
- You MAY ONLY use ONE LSC kit per vehicle.
- The materials are applied as supplied are should not be thinned or mixed with any other materials.
- Nox-Rust is a registered trademark of Daubert Chemical Company. The 712AM product is manufactured by Parker Corporation, and the X128T is manufactured by Daubert Chemical Company.
- YOU MUST MAINTAIN the LOG below and the LSC materials' MSDSs for a period of 5 years from the conclusion of the LSC.

Month	Column 1 - Number of LSC Kits Purchased	Column 2 – Total Volume of 712AM Purchased (liters) Multiply the number in Column 1 by 2, and enter the result below.	Column 3 – Total Volume of X128T Purchased (liters) Multiply the number in Column 1 by 3, and enter the result below.
		2009	
September			
October			
November			
December			
		2010	
January			
February			
March			
April			

27

This record must be maintained for 5 years.

Duplicate as Necessary

LSC PROCESS OVERVIEW:

All LSC activities will occur indoors at existing dealership service areas that comply with fire, zoning and building codes. The LSC will not require physical alterations to service areas and will consist of the two primary steps discussed below.

Step 1: Vehicle Preparation. Dealers will employ the

following procedures to prepare their service areas and vehicles for spraying.

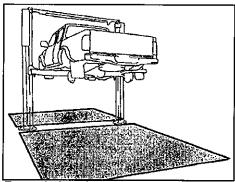
Initial setup of workspace. Locate dedicated work area in dealership's garage with a vehicle lift that is well ventilated. away from other vehicles, and can be sectioned off with temporary partitions. No physical alteration of the workspace or installation of new equipment is required for the LSC.

- <u>Place vehicle on lift</u>. Raise the vehicle using the vehicle lift; remove certain vehicle components (e.g., rear and spare tires); mask areas not to be sprayed.
- Work area setup. Place tarp beneath vehicle and set up temporary partitions around vehicle. Tarps are intended to capture limited overspray and to facilitate clean-up.
- Clean frame. Manually remove rust from frame using scraper, brush, and/or compressed air (pressure wash if necessary). No chemicals or solvents will be used to clean the frames.

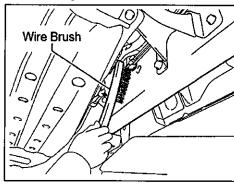
Step 2: Material Application. Dealers will apply the LSC anticorrosion materials as follows:

- Apply 712AM. Set up Vaupel spray gun and insert spray nozzle a specified distance into selected holes in the frame. Press spray gun trigger and pull out nozzle at fixed speed while spraying interior surface of frame. Each frame rail will utilize one liter of 712AM. All two liters of material will be used to assure complete application.
- Apply X128T. Set up spray gun and locate spray nozzle a specified
 - iii. Cross members from front to rear distance from frame surface. Press spray gun trigger and spray X128T on external surface of frame by moving spray nozzle at fixed speed across frame. Refill spray gun with X128T as needed until all three liters of material are used.
- Final steps. Reinstall components of vehicle, remove truck from lift, and spray X128T on areas of frame previously covered by lift. Allow 712AM and X128T to cure before returning vehicle to customer. Comply with any recordkeeping and material handling requirements.

Truck on lift



Frame being cleaned



ii. Inside surface of the right frame rail

iv. Inside surface of the left frame rail

Outside & bottom surfaces of the left frame rail

External frame surfaces where X128T is applied

i. Outside & bottom surfaces of the right frame rail



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Page 1 of 1

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 un

- 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 qun.
- 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

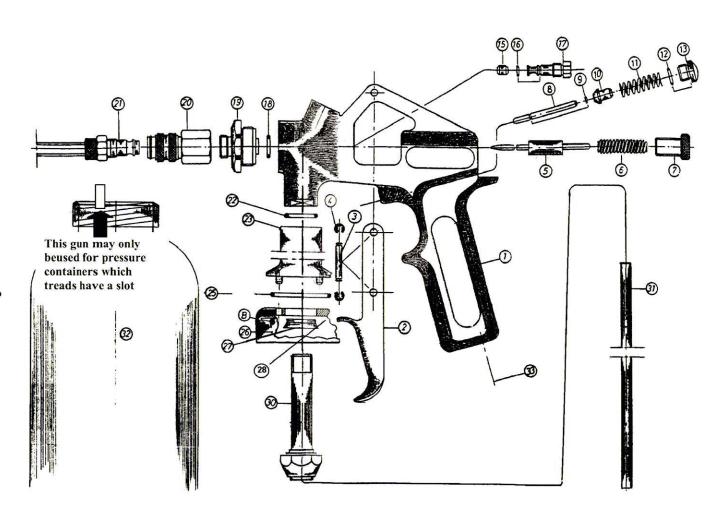
 The device, its accessories and packing material should be recycled in an environmentally correct manner.

State: Jan. 2009

3300 HSDR

Druckbehälterpistole pressure container gun

1	10 2919 001	gun body
2	50 3909 005	trigger
3	30 1102 006	trigger axle
3	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	**************************************	or voluments and the control of the
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





MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230 410-537-3000 • 1-800-633-6101

Martin O'Malley Governor

Shari T. Wilson Secretary

Anthony G. Brown Lieutenant Governor

SEP - 2:2009

Robert M. Summers, Ph.D. Deputy Secretary

Mr. Dylan M. Fuge Latham & Watkins LLP 565 Eleventh Street, N.W., Suite 1000 Washington D.C. 20004-1304

Dear Mr. Fuge:

This letter is in reference to your July 29, 2009 letter submitted on behalf of Toyota Motor Sales, U.S.A., Inc. ("Toyota") requesting an approval of a Limited Service Campaign ("LSC") to apply anti-corrosion sealants to certain model year Tacoma trucks at Toyota dealer locations in Maryland. Based on the information provided in your letter and the supplemental information packet submitted with your letter, the Department has determined that the Toyota dealers implementing the LSC do not require air permits, and grants them conditional approval to conduct the LSC subject to the conditions identified below.

The Department's approval hinges on several specific limitations and procedures for the LSC that must be met. The following limitations and procedures are designed to ensure that the public is reasonably protected from any air pollutant emissions resulting from the LSC:

- Each Toyota dealer location shall only use the individual LSC kits supplied by Toyota as specified in your July 29, 2009 letter and supplemental information packet for the LSC;
- (b) Each Toyota dealer location shall not use more than one kit per vehicle for the LSC:
- (c) Each Toyota dealer location shall only use the two (2) Vaupel HSDR 3300 spray guns supplied by Toyota for the LSC;
- (d) Each Toyota dealer location shall enclose the tips and nozzles of the spray guns in plastic or some other material when not in use during the LSC;
- (e) Each Toyota dealer location shall not process more than 7 vehicles per operating day during the LSC unless Toyota can demonstrate compliance with the requirements of COMAR 26.11.06.06 at a higher vehicle process rate;

- (f) The LSC for all Toyota dealer locations shall be completed no later than December 31, 2010; and
- (g) Each Toyota dealer location shall keep the following records:
 - (i) The days of operation (including the start date and end date) for the LSC; and
 - (ii) The total number of vehicles processed and kits used each day for the LSC.
- (h) Toyota shall, by January 31, 2011, submit to the Department a summary of the records identified in (g) above for each Toyota dealer location in Maryland, including the following information:
 - (i) Name and address;
 - (ii) Days of operation for the LSC (including start and end dates);
 - (iii) Total number of vehicles processed during the LSC;
 - (iv) Total number of kits used during the LSC; and
 - (v) Estimates of total volatile organic compound and particulate matter emissions, including supporting documentation.

Please notify the Department if the estimated emissions from the LSC increase or change materially from what was specified in your letter and supplemental information packet. In addition, permits to construct may be required if Toyota wishes to operate the LSC beyond December 31, 2010. The Department's conditional approval on the terms stated above and our conclusion that air permits are not required for the operation of the LSC, (1) do not exempt the LSC from other applicable regulatory requirements, including in particular the sealant requirements of COMAR 26.11.35, and (2) do not authorize the creation of a nuisance.

If you have any questions, please contact Ms. Suna Yi Sariscak of my staff at (410) 537-4129.

Sincerely,
Kuren MacM

Karen G. Irons, P.E., Administrator

Air Quality Permits Program

Air and Radiation Management Administration

KGI/aw

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

By: M. Longo

SECTION 1: PRODUCT IDENTIFICATION

Product Name:

NOX-RUST® X128T

Chemical Family: Material Usage: Petroleum Solvent/Additive Blend 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	40-50	OSHA PEL: 100 ppm
CAS #64742-88-7 and/or #64742-47-8		ACGIH TLV: 100 ppm
and/or #8052-41-3		ACGIH STEL: 200 ppm
Petroleum Hydrocarbon (Petrolatum)	20-25	OSHA PEL: 2 mg/m ³
CAS #8009-03-8		ACGIH TLV: 2 mg/m³ (for fumes)
Petroleum Wax	6-10	OSHA PEL: Not Established
CAS #64742-42-3		ACGIH TLV: 2 mg/m³(fumes)
[1]Calcium Carbonate	2-4	OSHA PEL:5 mg/m³(respirable fraction)
CAS #1317-65-3		OSHA PEL: 15 mg/m³(total dust)
and/or CAS #471-34-1		ACGIH TLV:10 mg/m ³ ([2]nuisance dust)
[1]Carbon Black	<1	OSHA:PEL: 3.5 mg/m³ (^[2] nuisance dust)
CAS #1333-86-4		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, CO₂, water spray, or regular foam. Large Fires: Water spray, fog, or regular foam. Move container from fire area if you can do it without risk. Apply cooling water to sides of containers that are exposed to flames until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use unmanned hose holder or monitor nozzles. If this is impossible, withdraw from area and let fire burn. Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

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

Unusual Fire/Explosion Hazards: 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

Odor: Petroleum Solvent
Boiling Point (initial): >300°F
Evaporation Rate (n-Butyl Acetate= 1): <1

Vapor Pressure (mmHg @ 20°C):

Vapor Density (air= 1):

3.4

Vapor Density (air= 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.

NOX-RUST® X128T [1384]

12/4/08

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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.

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.

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):

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

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-

water and Toxic Reinforcement Act of 1700 (Troposition of Jas Cit	ner a caremogenic of reproductive hazard.	
CHEMICAL	CAS NO.	Estimated Concentration %	
Crystalline Silica	14808-60-7	.03 max	

(Naturally occurring in mined calcium carbonate)

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	В

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

Nox-Rust 712AM

3/11/2009

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

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

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

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

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

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

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

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

Nox-Rust 712AM 3/11/2009 Page 2 of 4

SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

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

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

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

SECTION 7: SAFE HANDLING INFORMATION

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

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

SECTION 8: EXPOSURE CONTROLS

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

Ventilation: General and local exhaust.

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

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

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

hydrocarbons.

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

Color: Tan

Appearance: Viscous Liquid

Odor:

Boiling Point (initial):

Evaporation Rate (n-Butyl Acetate=1):

Vapor Pressure (mmHg @ 20°C):

Vapor Density (air=1):

NA

Solubility in Water: Not Determined

Specific Gravity: .9-1.0

pH: Not Applicable

Percent Volatile by Volume:

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.

Nox-Rust 712AM 3/11/2009 Page 3 of 4

SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)

VOC per gallon:

0.165 lbs/gal

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

EPA Hazard Category (40CFR Part 370):

D001 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%

RO/TPO 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 RO 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.

Nox-Rust 712AM 3/11/2009 Page 4 of 4

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

MARYLAND DEALER INFORMATION PACKET FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE FIRE, BUILDING AND ZONING CODES SECTION

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

In addition to the requirements identified in other Sections, your dealership must comply with any applicable state and local fire 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 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 writing in order to: (A) provide information about the LSC and where your dealership will conduct it; and (B) confirm, in writing, that a permit is not required, or obtain a permit if one is required.

You will find a model letter and attachments that you need to provide to your local fire official in either Appendix A (all dealers, except City of Baltimore) or Appendix B (dealers in City of Baltimore only) of this Section (Note: you will need to add some descriptive information about the spraying location where you will conduct the LSC to these materials). These materials include Determinations of Compliance with the applicable fire codes prepared by Commercial Construction Consulting, Inc. ("C3") for TMS and a concurrence from the Maryland State Fire Marshal that the LSC complies with the State Fire Code.

To identify your local fire official and the Appendix (i.e., A or B) that you should use to make contact go to Table 1 (starting at page 51) (Note: <u>Only dealers located in the City of Baltimore should use Appendix B</u>).

We recommend calling your local fire official first, to alert them that you will be sending this information. To avoid confusion, please make sure that, after calling, you send the letter and all attachments contained in the applicable Appendix so that the local fire official has more than a verbal description.

Important: The LSC is designed to comply with local fire codes. However, based upon the local fire official's review of your dealership, the fire official may impose additional requirements or modifications. If this occurs, please work with your fire official to identify and remediate the concerns. Please go to the C.L.E.A.N. Dealer website (http://cleandealer.com) or call the EH&S Hotline (877-572-4347) for additional assistance.

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 51) to see whether it has any additional building or zoning requirements applicable to the LSC and contact your local officials as indicated.

I. SUMMARY OF APPLICABLE STATE REQUIREMENTS

A. Fire Code²

1. TMS has reached out to the State Fire Marshal who confirmed that the LSC does not require a state fire permit under the state fire code; however, the LSC may also trigger procedures for review and permitting by your <u>local</u> fire official. See Table 1 (starting at p. 51) for your dealerships requirements.

<u>Regulatory Note:</u> 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. All Dealers (EXCEPT Baltimore City): The LSC must be conducted consistent with state laws regarding ventilation and fire suppression controls (see the <u>Site Selection Section</u>), which require:
 - Adequate ventilation in the area where the LSC will be conducted;
 and
 - b. No open flames or spark-producing equipment within 20 ft of the LSC operations; and
 - c. No drying, curing, or fusion apparatus within 20 ft of the LSC operations; and
 - No material with a flash point less than 37.8°C (100°F) (<u>Note</u>:
 Each of the LSC's anti-corrosion materials that you are being provided interior and exterior satisfies this requirement); <u>and</u>
 - e. No solvents with a flash point less than 37.8°C (100°F).
- 3. Baltimore City Dealers: The LSC must be conducted consistent with City of Baltimore laws regarding ventilation and fire suppression controls, which require:
 - a. The floor of the area where the LSC will be conducted (called a spraying space) is made of non-combustible construction (i.e. concrete) or will be covered with a non-combustible sheet; <u>and</u>
 - b. Fire extinguishers are provided in the vicinity of the LSC operation; and

Maryland has adopted the National Fire Protection Association's Uniform Fire Code – NFPA 1 (2006 ed.).

- c. No open flames or spark-producing equipment are permitted within 20 ft of the LSC operations; <u>and</u>
- d. No drying, curing, or fusion apparatus within 20 ft of the LSC operations; <u>and</u>
- e. Adequate ventilation in the service area that meets fire and building code requirements where the LSC is conducted; **and**
- f. The LSC is conducted in an acceptable area (e.g., a spray room or spraying space), which can be a portion of your service garage setup as described in the <u>Site Selection Section</u> and the **Technical Instructions**; <u>and</u>
- g. LSC operations are conducted within any limits the local fire code official might establish; and
- h. 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 satisfies this requirement); **and**
- i. No solvents with a flash point less than 37.8°C (100°F).

<u>Technical Note</u>: 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).

- 4. Both LSC materials are classified as 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 <u>must</u> 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

Under the Maryland Fire Prevention Code (i.e., NFPA-1) the Nox-Rust® 712AM is a Class IIIB combustible liquid (Flash point > 392° F (200° C)) with an HMIS fire hazard rating of 1, and the Nox-Rust® X128T is a Class II combustible liquid (Flash point 105° F) with an HMIS fire hazard rating 2.

to 120 gallons.⁴ 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.

<u>Technical Note</u>: 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)

Note that if your jurisdiction has adopted the 2006 edition of the IFC, there is no limit to the number of fire cabinets you may store in a single fire area.

B. Building Code

1. The LSC should not require a building permit under the state building code because adding the LSC will 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).

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

<u>Table 1</u> 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 51), PLEASE GO TO THE C.L.E.A.N. DEALER WEBSITE (HTTP://CLEANDEALER.COM) OR CALL THE EH&S HOTLINE (866-356-1735). The sections below briefly review these requirements.*

IMPORTANT REMINDER: You <u>must</u> contact your local fire official and provide information about the LSC and where you will conduct it <u>prior to</u> commencing LSC activities. As noted above, you should use the model letter and attachments in either Appendix A (all Maryland dealers, except City of Baltimore) or Appendix B (dealers in City of Baltimore only) of this Section to make this contact.

BEFORE contacting your local fire official, you should determine that your dealership complies with the ventilation, storage, and spray space requirements identified above. After making this determination, we recommend calling your local fire official to alert them that you will be sending this information. To avoid confusion, please make sure after calling that you send the letter and all attachments contained in either Appendix A or B (as dictated by your dealership's location – See Table 1) so that the fire official has more than a verbal description of the LSC.

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 Appendices A and B can be used for that purpose as well.

(This page intentionally left blank.)

Table 1: Local Requirements Summary for Maryland Locations

	Local Fire Code Official	
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
Maryland (State)	Note: Maryland State Fire Prevention Code=NFPA Jurisdiction	
Allegany County - • SHAFFER TOYOTA, BUICK, CHEVY	Ryan Chapman Deputy Chief State Fire Marshal Western Regional Office, Maryland State Police Barrack C, 1125 National Highway, Cumberland, MD 21502 (301) 729-5021 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of materials that are buoyant, flammable, explosive, hazardous to health, or in times of flooding could be injurious to human, animal or plant life will apply. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact James A Squires Jr., Division Chief County Office Complex First Floor Suite 109 Cumberland, Maryland 21502-3401 301-777-5951
Annapolis - • KOONS TOYOTA	John J. Bowes, Lieutenant City of Annapolis Fire Marshal's Office 1790 Forest Drive, Annapolis, MD 21401 (410) 263-7975 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located within the 100-year flood zone; otherwise additional requirements related to the storage of LSC materials may be applicable. Contact Jon Arason, Director Planning and Zoning, 145 Gorman St. Annapolis, MD 21401 410-263-7961

Table 1: Local Requirements Summary for Maryland Locations

	Local Fire Code Official	
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
Maryland (State)	Note: Maryland State Fire Prevention Code=NFPA Jurisdiction	
Allegany County - • SHAFFER TOYOTA, BUICK, CHEVY	Ryan Chapman Deputy Chief State Fire Marshal Western Regional Office, Maryland State Police Barrack C, 1125 National Highway, Cumberland, MD 21502 (301) 729-5021 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of materials that are buoyant, flammable, explosive, hazardous to health, or in times of flooding could be injurious to human, animal or plant life will apply. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact James A Squires Jr., Division Chief County Office Complex First Floor Suite 109 Cumberland, Maryland 21502-3401 301-777-5951
Annapolis - • KOONS TOYOTA	John J. Bowes, Lieutenant City of Annapolis Fire Marshal's Office 1790 Forest Drive, Annapolis, MD 21401 (410) 263-7975 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located within the 100-year flood zone; otherwise additional requirements related to the storage of LSC materials may be applicable. Contact Jon Arason, Director Planning and Zoning, 145 Gorman St. Annapolis, MD 21401 410-263-7961

	Local Fire Code Official	
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
Baltimore County - RUSSEL TOYOTA JERRY'S TOYOTA	Zachary Stith, Fire Director Baltimore County Office of the Fire Marshal 700 E. Joppa Rd, Towson, MD 21286	After submission of the materials at Appendix A, your local fire marshal may determine that additional signage is required to indicate that your dealership is handling and storing flammable or combustible liquids. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact
TIMONIUM TOYOTA	(410) 887-4880	Contact
R&H TOYOTA	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	Jeff Mayhew, Chief Community Planning Division Department of Permits & Development Management 111 W. Chesapeake Avenue, Room 213 Towson, MD 21204 410-887-3480
Bel Air - • JONES TOYOTA	See Hartford County	Based on a jurisdiction review, the Jones Toyota dealership is located outside Bel Air city limits, in Hartford County.
Bethesda - • JIM COLEMAN TOYOTA	See Montgomery County	Based on a jurisdiction review, the Jim Coleman Toyota dealership is located outside Bethesda city limits, in Montgomery County.
Bowie - TOYOTA OF	San Britana Company	Based on a jurisdiction review, the Toyota of Bowie dealership is located outside Bowie
BOWIE	See Prince George's County	city limits, in Prince George's County.
	Duane K. Svites, Deputy State Fire Marshal Southern Regional Office, Louis L. Goldstein Multi-Service Center,	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may apply.
Calvert County - BAYSIDE TOYOTA	200 Duke St, Ste 1500, Prince Frederick, MD 20678	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit.
	(443) 550-6820	Contact
	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	Calvert County Department of Planning and Zoning Address: County Services Plaza, 150 Main Street Prince Frederick, MD 20678 Phone: (410) 535-1600

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Carroll County - • KOONS WESTMINSTER TOYOTA	Allen R. Gosnell, Deputy Chief State Fire Marshal Metro Regional Office, 7543 Main St, Ste 101, Sykesville, MD 21784 (410) 552-0154	You should confirm that the location where you will conduct the LSC is not located within the 100-year flood zone; otherwise additional requirements related to the storage of LSC materials may be applicable. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact
St	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	Gayle Fritz, Administrator Zoning Administration Phone: 410-386-2980 Fax: 410-876-9252 Location: 225 North Center St., Westminster, MD 21157
Charles County - TOYOTA OF WALDORF	Duane K. Svites, Deputy State Fire Marshal Southern Regional Office, Louis L. Goldstein Multi-Service Center, 200 Duke St, Ste 1500, Prince Frederick, MD 20678 (443) 550-6820	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may apply. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact
WALSON	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	Charles County Government Department of Planning and Growth Management 200 Baltimore Street La Plata, MD 20646 301-645-0618
Clarksville - • ANTWERPEN'S TOYOTA VILLAGE	See Howard County.	Based on a jurisdiction review, the Antwerpen's Toyota Village dealership is located outside Clarksville city limits, in Howard County.

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Frederick County - • DARCARS TOYOTA OF FREDERICK	Marc E. McNeal Chief Fire Marshal 340 Montevue Lane, Frederick, MD 21702 (301) 600-1416 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	
Gaithersburg - • FITZGERALD'S LAKEFOREST	NFPA Jurisdiction — Please complete the materials in Appendix A. DO NOT SUBMIT THESE MATERIALS. Instead, please give them to Michael Broman (Region Customer Services Field Manager; (410) 787-8078), and we will submit them for you.	After submission of the materials at Appendix A, your local fire marshal may require your dealership to submit a Spray Permit application for the LSC. Your local fire marshal will direct you to the necessary permit application forms if such a permit is required. You will be required to post "No Smoking" signs at the service bays conducting the LSC. You should confirm that the location where you will conduct the LSC is not located in a Floodplain Zone; otherwise you may be required to comply with additional materials storage requirements. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Planning and Code Administration 31 S Summit Ave Gaithersburg, MD 20877 Phone: 301-258-6330
Glen Burnie - TOYOTA OF GLEN BURNIE	See Anne Arundel County.	Based on a jurisdiction review, the Toyota of Glen Burnie dealership is located outside Glen Burnie city limits, in Anne Arundel County.

	Local Fire Code Official	
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
Harford County - • JONES TOYOTA; • THOMPSON TOYOTA	Mark A. Bilger, Deputy Chief State Fire Marshal Northeast Regional Office Mary E. W. Risteau Multi-Service Center 2 South Bond Street Bel Air, MD 21014 (410) 836-4844 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located in a Floodplain Zone; otherwise additional material storage requirements may apply. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Mary F. Chance, Director Community Development 319 South Main Street Bel Air, MD 21014 410.638.3389
Howard County - • LAUREL TOYOTA	William A. Smith, Deputy Chief Office of the Fire Marshal 6751 Columbia Gateway Dr, Columbia, MD 21046 (410) 313-6040 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	
Landover Hills - TOYOTA OF BOWIE (TCSC)	See Prince George's County	Based on a jurisdiction review, the Toyota of Bowie Service Center is located outside Landover Hills city limits, in Prince George's County.
Laurel - • LAUREL TOYOTA	See Howard County	Based on a jurisdiction review, the Laurel Toyota is located outside Laurel city limits, in Howard County.
Lavale - • SHAFFER TOYOTA, BUICK, CHEVY	See Allegany County	Based on a jurisdiction review, the Shaffer Toyota, Buick, Chevy is located outside Lavale city limits, in Allegany County.
Lexington Park - TOYOTA OF SOUTH MARYLAND	See St. Mary's County	Based on a jurisdiction review, the Toyota of South Maryland is located outside Lexington Park city limits, in St. Mary's County.

Location	Local Fire Code Official & Fire Code Type	Other Potentially Relevant Local Requirements
Marlow Heights - • BELTWAY TOYOTA	See Prince George's County	Based on a jurisdiction review, the Beltway Toyota is located outside Marlow Heights city limits, in Prince George's County.
Montgomery County - • JIM COLEMAN TOYOTA; • DARCARS TOYOTA; • 355 TOYOTA; • FITZGERALD'S LAKEFOREST	 NFPA Jurisdiction – Please complete the materials in Appendix A. DO NOT SUBMIT THESE MATERIALS. Instead, please give them to Michael Broman (Region Customer Services Field Manager; (410) 787-8078), and we will submit them for you. 	You should confirm that you will not be storing, handling, or using class II or class III combustible liquids (including the LSC materials) in excess of twenty-five (25) gallons inside your building; or in excess of sixty (60) gallons outside of the building; otherwise a permit will be required. You will be required to post "No Smoking" signs at the service bays conducting the LSC. Contact Office of Zoning and Administrative Hearings Stella B. Werner Council Office Building 100 Maryland Avenue, Room 200 Rockville, Maryland 20850 (240) 777-6660
Owings Mills - R&H TOYOTA	See Baltimore County	Based on a jurisdiction review, the R&H Toyota is located outside Owing Mills city limits, in Baltimore County.
Pocomoke City - • MIDWAY TOYOTA	Jeffrey McMahon, Fire Marshal Worcester County Fire Marshal's Office, Government Center, One West Market St, Room 1003 Snow Hill, MD 21863 (410) 632-5666 NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may apply. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Harvey Davis, Housing/Zoning Coordinator Housing & Zoning Department 101 Clarke Ave./P. O. Box 29 Pocomoke City, Maryland 21851
Prince Frederick - • BAYSIDE TOYOTA	See Calvert County	Based on a jurisdiction review, the Bayside Toyota is located outside Prince Frederick city limits, in Calvert County.

	Local Fire Code Official	
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
Prince George's County - • TOYOTA OF BOWIE; • TOYOTA OF BOWIE (TCSC); • BELTWAY TOYOTA	Scott K. Hoglander, Acting Major Fire/EMS Department Headquarters 9201 Basil Ct, Ste 452, Largo, MD 20774 (301) 883-5220 NFPA Jurisdiction - Adopts a multitude of NFPA codes. Materials to contact local fire official are found in Appendix A.	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may apply. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Stan D. Brown, Zoning Admin. County Administration Building 14741 Governor Oden Bowie Drive Upper Marlboro, MD 20772-3050 (301) 952-3186
Salisbury - POHANKA OF SALISBURY	See Wicomico County	Based on a jurisdiction review, the Bayside Pohankka of Salisbury is located outside Salisbury city limits, in Wicomico County.
Silver Spring - DARCARS TOYOTA	See Montgomery County	
Rockville - • 355 TOYOTA	 NFPA Jurisdiction — Please complete the materials in Appendix A. DO NOT SUBMIT THESE MATERIALS. Instead, please give them to Michael Broman (Region Customer Services Field Manager; (410) 787-8078), and we will submit them for you. 	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of the LSC materials may be applicable. You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit. Contact Department of Community Planning and Development Services Rockville City Hall, 2nd Floor 111 Maryland Avenue Rockville, MD 20850 240-314-8200

Location	Local Fire Code Official	Other Betardalla Balancia
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
St. Mary's County - TOYOTA OF SOUTH MARYLAND	Duane K. Svites, Deputy State Fire Marshal Southern Regional Office, Louis L. Goldstein Multi-Service Center, 200 Duke St, Ste 1500, Prince Frederick, MD 20678	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may apply. Contact
	(443) 550-6820	Department of Land Use & Growth Management St. Mary's County Government
	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	23115 Leonard Hall Dr. Leonardtown, MD 20650 301-475-4200
	John E. Wagner Deputy Chief State Fire Marshal Upper Eastern Regional Office 301 Bay St, Lower Level	You should confirm that the location where you will conduct the LSC is not located the Floodplain District; otherwise you will be subject to additional permitting and material storage requirements.
Talbot County -	Easton, MD 21601	You should verify that the LSC will not constitute a change in use or impermissible use under your zoning permit.
KOONS EASTON TOYOTA BALTIMORE	(410) 822-7609 x 302	Contact
	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	Tom Hamilton – Town Planner Town of Easton Planning & Zoning 14 S. Harrison Street P.O. Box 520 Easton, Maryland 21601 (410) 822-1943
Waldorf - • TOYOTA OF WALDORF	See Charles County	Based on a jurisdiction review, the Toyota of Waldorf is located outside Waldorf city limits, in Charles County.

	Local Fire Code Official	
Location	& Fire Code Type	Other Potentially Relevant Local Requirements
Washington County - • YOUNGER TOYOTA	Jason M. Mowbray, Deputy Chief State Fire Marshal Western Regional Office, 12 N. Jonathan St, Ste 100 Hagerstown, MD 21740	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may apply. Contact
	(301) 791-4758	Michael Thompson, Planning Director County Administrative Annex
	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A. ⁶	80 West Baltimore Street Hagerstown, MD 21740 (240) 313-2430
Westminster - • KOONS WESTMINSTER TOYOTA	See Carroll County	Based on a jurisdiction review, the Koons Westminster Toyota is located outside Westminster city limits, in Carroll County.
Wicomico County - • POHANKA OF SALISBURY	Edward L. Torbert, Chief Fire Protection Specialist Wicomico County Fire Protection Division,	You should confirm that the location where you will conduct the LSC is not located below the Flood Protection Elevation (FPE); otherwise additional requirements related to storage of LSC materials may be applicable.
	P.O. Box 968, Salisbury, MD 21803	Contact
	(410) 548-4994	Department of Planning, Zoning, and Community Development: Government Office Building Room 203
	NFPA Jurisdiction - Adopts the State Fire Code. Materials to contact local fire official are found in Appendix A.	North Division Street and Route 50 P.O. Box 870 Salisbury, MD 21803-0870 (410) 548-4860

Your jurisdiction's adoption of the BOCA National Fire Prevention Code is not expected to put any additional requirements on the dealership.

APPENDIX A

Materials for Maryland State Fire Prevention Code Compliance

Compliance Information

&

Materials to submit to the Local Fire Official

- Model Letter;
- LSC Operation Description;
- C3 Determination of Compliance with Maryland State Fire Prevention Code;
- State Fire Marshal's Response;
- Dealership Information Sheet; and
- MSDSs for the LSC Materials.

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

Appendix A1: Maryland State Fire Prevention Code - Summary of Fire Code Requirements

- Your local jurisdiction is subject to the Maryland State Fire Prevention Code (based on NFPA 1), likely without any changes that would impose any additional requirements on the LSC operation.
- Before you begin conducting the LSC, you will need to confirm in writing with your local fire official that a permit is not required or, if one is required, obtain it. Under the Maryland State Fire Prevention Code, the local fire official may have 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 contacting your local fire official, Appendix A2 contains (1) a model letter, (2) a Determination of Compliance and LSC Process Description from Commercial Construction Consulting Inc. ("C3"), a professional consulting firm retained by TMS to assess the LSC's compliance with the Maryland State Fire Prevention Code, (3) a letter from the Maryland State Fire Marshal confirming C3's determination that the LSC is compliant with State Fire Code requirements, and (4) a background information sheet that you must complete that will provide your local fire official with relevant dealer-specific information about where the LSC operation will take place. (Note: Electronic copies of these materials can be found on the C.L.E.A.N. Dealer website http://cleandealer.com.).

You should do the following:

- Address the model letter to your local fire official and put it on the dealership's letterhead. (See Table 1 beginning at page 51.)
- 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 C3;
- The State Fire Marshal's Letter confirming the LSC's compliance with the Maryland State Fire Prevention Code;
- The completed dealership information sheet from Appendix A2;
 and
- Copies of the Material Safety Data Sheets (MSDSs) for the NOX-Rust® 712AM and NOX-Rust® X128T materials (provided in the <u>Air Recordkeeping Section</u> 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 it to your local fire official.
- REMEMBER to submit the correct number of copies noted in Table 1 (beginning at page 51.).
- You may wish to consider calling (or visiting) your local fire code official before submitting the letter and attachments to let them know you will be making the submission.
- Note: To avoid confusion, make sure to send the letter and all attachments to ensure that the fire official has more than a verbal description of the LSC.

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

USE FOR ALL JURISDICTIONS, EXCEPT BALTIMORE CITY

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

[DEALER LETTERHEAD]

[Insert Local Code Official Contact Information from Table 1 (pg 51)]

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 liquid as defined by the Maryland State Fire Prevention Code or locally adopted fire codes. 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. To that end, Toyota has contacted the State Fire Marshal, who has concurred that the LSC complies with the applicable fire code requirements.
To assist your evaluation, we have attached the following to this letter: (1) a description of the LSC process, materials and equipment, (2) an LSC Determination of Compliance with the Maryland State Fire Code, which was provided to the State Fire Marshal, (3) a copy of the State Fire Marshal's response, and (4) site-specific information about the location where we will conduct the LSC. With this information and the State Fire Marshal's approval, 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] at [Number]. Thank you for your time and consideration.
Best regards, [Dealer]
[Dealership]
Attachments
Attachments: C3 Determination of Compliance, with description of LSC Process and MSDSs Approval of LSC from Maryland State Fire Marshal's Office

Dealership information sheet

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

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July 29, 2009

Toyota Motor Sales, U.S.A., Inc. 19001 South Western Avenue Torrance, CA 90501-1106

Attn: Sandra H. Waddell, Esq.

Managing Counsel - Environmental, Health & Safety

Re: Toyota Limited Service Campaign, State of Maryland

Compliance with the Uniform Fire Code

Dear Ms. Waddell:

Thank you for engaging Commercial Construction Consulting, Inc. ("C3") to determine compliance with applicable Maryland fire code regulations in advance of Toyota Motor Sales' implementation of a Limited Service Campaign ("LSC") involving the application of two anti-corrosion sealant materials to the frame rails on the underside of certain Toyota vehicles. We understand that the LSC will be implemented by Toyota dealers in a number of Midwest and Eastern states, including Maryland. We also understand that the LSC involves a discrete group of vehicles covered by a customer support program and is already underway in certain other states; it is intended that the LSC will begin in Maryland in August 2009 and it will conclude by October 2010.

Pursuant to your request, this letter evaluates the LSC's compliance with the fire code in those local Maryland jurisdictions that have adopted the NFPA, Uniform Fire Code. As you will see in our analysis below, we have determined that the LSC program will be in compliance with the applicable provisions of the 2006 edition of NFPA 1, Uniform Fire CodeTM and the 2003 edition of NFPA 33, Standard for Spray Application for Flammable or Combustible Materials, adopted by certain Maryland jurisdictions where the LSC will be conducted.

Enc.



I. Project Overview

Toyota is in the process of implementing a Limited Service Campaign ("LSC") 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 Maryland. 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 intended that the LSC will begin in Maryland in August 2009 and it will conclude by October of 2010.

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

II. Executive Summary

- The LSC is governed by the regulations found in NFPA-1 (2006), the Uniform Fire Code.
 Dealers will be provided with written instructions on how to implement the LSC in compliance with these regulations.
- The LSC will involve the spray application of two combustible materials (both materials have flash points in excess of 100°F one is a Class II and one is a Class III), which will be applied to the vehicle frames in two separate, sequential operations. The materials are not flammable.
- The LSC materials are viscous and will be applied using a specialized spray gun (Vaupel HSDR 3300) that has a very high transfer efficiency (based on testing by the manufacturer and an independent third party laboratory), resulting in very little overspray.
- The materials will be applied while the vehicles are up on lifts, in regular vehicle service bays
 provided with adequate ventilation. The LSC will not be conducted in a spray room or spray
 booth, but will be conducted in an approvable spray space consistent with the requirements
 of NFPA-33 (2003).
- The LSC will not require the dealer to construct, enlarge, alter, repair, move, demolish, or change the occupancy of the dealership, and will not require the dealer to erect, install, enlarge, alter, repair, remove, convert or replace any electrical, gas, mechanical or plumbing system.
- The LSC spraying space will meet applicable requirements. Dealers will be instructed to set it up in an area with adequate ventilation that is at least 20 feet from ignition sources. The spraying space will be surrounded by temporary partitions for facility clean up and to control overspray. The temporary partitions around the spray space will have a 12" gap at the bottom to prevent the possible accumulation of vapors.
- Mechanical ventilation and automatic sprinkler protection are not required for the LSC spraying space, as the LSC process meets all the requirements of NFPA-33 (2003) for the spray application of vehicle undercoating.



III. Applicable Codes and Regulations

This analysis is intended for use in those local Maryland jurisdictions that have adopted a version of the NFPA-1 as published by the National Fire Protection Association (NFPA). This analysis is based on the 2006 version of NFPA-1, which has been adopted in part as the fire code in the State of Maryland.

IV. NFPA-1 (2006), Uniform Fire CodeTM

Regulation: Section 43.1.1: Operations involving the spray application of flammable and combustible materials shall comply with NFPA 33, Standard for Spray Application Using Flammable or Combustible Materials, and Section 43.1.

Analysis: This provision requires installations and operations to be in compliance with Section 43.1, Spraying, Dipping, and Coating Using Flammable or Combustible Materials, and NFPA 33 (2003).

Regulation: Section 43.1.4.1.3: Vehicle undercoating and body lining operations shall also meet the requirements of Section 14.1 of NFPA 33, Standard for Spray Application Using Flammable or Combustible Materials.

Analysis: This provision requires installations and operations to be in compliance with Section 14.1, Vehicle Undercoating and Body Lining, of NFPA-33 (2003).

V. NFPA-33 (2003), Standard for Spray Application Using Flammable or Combustible Materials

Regulation: 3.3.7.1 Combustible Liquid. A combustible liquid shall be defined as any liquid that has a closed-cup flash point at or above 37.8°C (100°F), as determined by the test procedures and apparatus set forth in 1.7.4. Combustible liquids shall be classified as Class II or Class III as follows:

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

Class IIIA. Any liquid that has a flash point at or above 60°C (140°F), but below 200°F (93°C). Class IIIB. Any liquid that has a flash point at or above 93°C (200°F).

Analysis: The material Nox-Rust® 712AM has a flash point of greater than 200°C (392°F), 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 8.2.1 (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. Any single cabinet shall contain not more than 454 L (120 gal) of Class I, Class II, or Class IIIA liquids, of which not more than 227 L (60 gal) shall be Class I and Class II liquids.

Regulation: Section 8.2.2: 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 (1) or (2), whichever is greater:

- (1) A supply for one day
- (2) 95 L (25 gal) of Class IA liquids in containers, plus 454 L (120 gal) of Class IB, IC, II, or III liquids in containers, plus 2 portable tanks each not exceeding 2500 L (660 gal) of Class IB, Class IC, Class II, or Class IIIA liquids, plus 20 portable tanks each not exceeding 2500 L (60 gal) of Class IIIB liquids

Analysis: The LSC materials 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 (one such kit for each vehicle). The dealers will be instructed to store these materials in accordance with the requirements of NFPA 30.

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

- 14.1.1: Spray undercoating or spray body lining of vehicles that is conducted in an area that has adequate natural or mechanical ventilation shall be exempt from the provisions of this standard, if all of the requirements of 14.1.1.1 through 14.1.1.4 are met.
- 14.1.1.1: There shall be no open flames or spark-producing equipment within 6100 mm (20 ft) of the spray operation while the spray operation is being conducted.
- 14.1.1.2: There shall be no drying, curing, or fusion apparatus in use within 6100 mm (20 ft) of the spray operation while the spray operation is being conducted.
- 14.1.1.3: Any solvent used for cleaning procedures shall have a flash point not less than 37.8°C (100°F).
- 14.1.1.4: The coating or lining materials used shall meet one of the following criteria:
 - (1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids
 - (2) Not contain any solvent or component that has a flash point below 37.8°C (100°F)
 - (3) Consist only of Class IIIB liquids and not include any organic peroxide catalyst

Analysis: During LSC spraying operation no open flames or drying apparatus will be within 20 feet; therefore, the requirements of 14.1.1.1 and .2 will be met. Section 14.1.1.3 does not apply because the LSC does not involve any cleaning procedures. Finally, Section 14.1.1.4 requires that automobile undercoating materials meet one of the three criteria listed in that Section. The LSC materials all have flash points greater than 100°F; therefore, they meet the requirements of Section 14.1.1.4(2). Since the LSC satisfies 14.1.1.4(2) and the regulation only requires compliance with one of three subsections of 14.1.1.4, Sections 14.1.1.4(1) and (3) do not apply to the LSC. As a result, the application of the LSC materials does not require a spray booth, nor are automatic sprinklers required.



VI. CONCLUSION

The LSC program is in compliance with the requirements of the Maryland Fire Prevention Code, NFPA-1 (2006) and NFPA-33 (2003), governing the spray application of combustible materials. Dealers are being provided detailed instructions on how to conduct the LSC process to meet the applicable provisions of these codes. An automatic fire protection system and mechanical ventilation is not required as the LSC falls within the scope of NFPA-33 (2003) Section 14.1 relating to the spray finishing of automobile undercoating materials.

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

Very truly yours,

Douglas R. Anderson

Douglas R. Anderson Manager, Code Advisory Group

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Limited Service Campaign ("LSC") Overview

LSC PROCESS STEP 1 - VEHICLE PREPARATION

- Preparing the Vehicle Frame:
 - Vehicle preparation requires no chemicals, solvents, or oils.
 - Pressure wash frame (if necessary).
 - Place vehicle on lift (Exhibit A).
 - If vehicle work area is within 20 feet of an adjacent bay, set up partition (with a 12" opening at bottom) around the LSC 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 and 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 rails. Nox-Rust® 712AM: Flash Point >200° C (392° F) (Class IIIB combustible; HMIS fire hazard rating of 1). The spray gun has a 99% transfer efficiency for application of the interior material.
 - Three liters of the second material Nox-Rust® X128T are applied to the exterior of the vehicle frame rails. Nox-Rust® X128T: Flash Point 105° F (Class II combustible; HMIS fire hazard rating of 2). The spray gun has a 92.5% transfer efficiency for application of the exterior material. 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 materials are nonflammable
 - There will be no open flames or spark-producing equipment or appliances within 20 feet of the LSC operation
 - There will be no drying, curing, or fusion apparatus within 20 feet of the LSC operation
- Furthermore, the dealer will take additional precautions including:
 - Fire extinguishers will be provided in the vicinity of the LSC operation
 - Any combustible floor construction in the spraying area will be covered with Fire Retardant Poly Sheeting (e.g., TRM 'WEATHER-ALL' Flame Retardant Film)

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

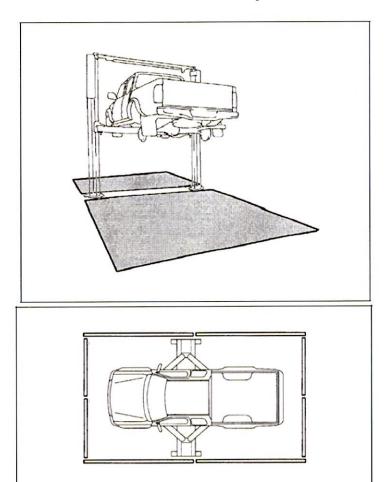
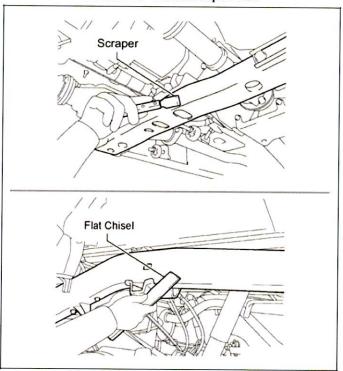
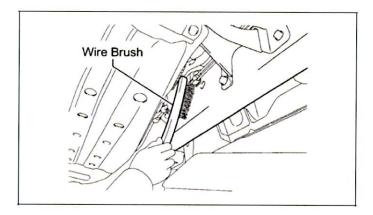




Exhibit B: Vehicle Preparation







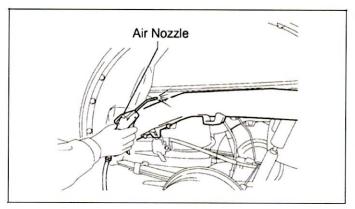
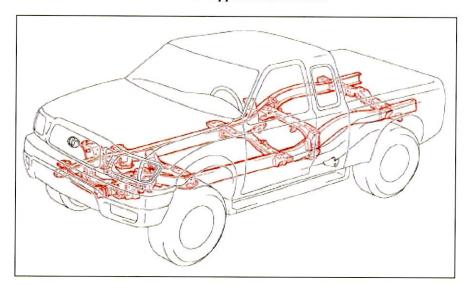
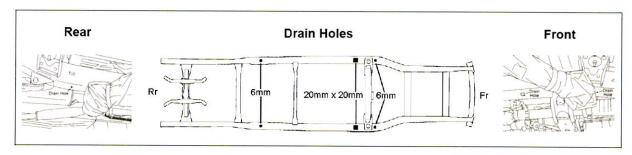




Exhibit C: Application Locations





ATTACHMENT 2: RESPONSE FROM MARYLAND STATE FIRE MARSHAL TO C3'S DETERMINATION OF COMPLIANCE.

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To <Sandra_Waddell@toyota.com>
cc ""State Fire Marshal Barnard"" <wbarnard@mdsp.org>

bcc

Subject RE: Toyota Limited Service Campaign - Your Review Requested

Ms. Waddell:

I have the reviewed the document from Commercial Construction Consulting.

It appears that everything is in compliance with NFPA 1, 30, and 33. It is very important that the storage arrangements comply with the requirements of NFPA 30.

Toyota may encounter more stringent standards or amendments in the metropolitan counties of Maryland. The local amendments and contact information can be found at www.mdcodes.org.

Please feel free to contact me personally if you have any questions or concerns.

Best Regards,



J. Dennis Gentzel, P. E. Chief Fire Protection Engineer Department of State Police Office of the State Fire Marshal 1201 Reisterstown Road Pikesville, MD 21208-3899 410-653-8980 800-525-3124 410-653-8988 Fax

From: William E. Barnard [mailto:wbarnard@mdsp.org]

Sent: Thursday, July 30, 2009 9:24 AM **To:** Sandra_Waddell@toyota.com

Cc: dgentzel@mdsp.org

Subject: RE: Toyota Limited Service Campaign - Your Review Requested

July 30, 2009

Sandra H. Waddell, Esq.
Managing Counsel - Environmental, Health and Safety
Toyota Motor Sales, U.S.A., Inc.
19001 S. Western Ave. – HQ11
Torrance, CA 90501

Dear Ms. Waddell:

The information you provided concerning the Limited Service Campaign has been received. I have asked Chief Fire Protection Engineer Dennis Gentzel to promptly review the materials and provide me with his recommendations. Office of the State Fire Marshal appreciates your approach to this program. If you have any questions or concerns, please contact me.

William E. Barnard, CFPS Maryland State Fire Marshal 800-525-3124 – Office 443-336-7369 - Mobile

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 consistent with the requirements identified in C3's letter.
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]

IMPORTANT!

Please be sure you attach copies of the MSDSs (see <u>Air Recordkeeping Section</u>) to the letter being submitted to your local Fire Marshal.

APPENDIX B

Compliance Materials for Fire Code of Baltimore City

Compliance Information

&

Materials to submit to the Local Fire Official

- Model Letter;
- LSC Operation Description;
- C3 Determination of Compliance with the Fire Code of Baltimore City;
- C3 Determination of Compliance with Maryland State Fire Prevention Code;
- State Fire Marshal's Response;
- Dealership Information Sheet; and
- MSDSs for the LSC Materials.

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

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Appendix B1: Fire Code of Baltimore City - Summary of Fire Code Requirements

- Your local jurisdiction is subject to the Fire Code of Baltimore City (based on the International Fire Code ("IFC"), likely without any changes that would impose any additional requirements on the LSC operation.
- Before you begin conducting the LSC, you will need to confirm in writing with your local fire official that a permit is not required or, if one is required, obtain it. Under the Fire Code of Baltimore City, the local fire official may have 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 contacting your local fire official, Appendix B2 contains (1) a model letter, (2) a Determination of Compliance and LSC Process Description from Commercial Construction Consulting Inc. ("C3"), a professional consulting firm retained by TMS to assess the LSC's compliance with the Fire Code of Baltimore, (3) a Determination of Compliance by C3 for the Maryland State Fire Prevention Code, (4) a letter from the Maryland State Fire Marshal confirming C3's determination that the LSC is compliant with State Fire Code requirements, and (5) a background information sheet that you must complete that will provide your local fire official with relevant dealer-specific information about where the LSC operation will take place. (Note: Electronic copies of these materials can be found on the C.L.E.A.N. Dealer website http://cleandealer.com.).

You should do the following:

- Address the model letter to your local fire official and put it on the dealership's letterhead. (See Table 1 beginning at page 51.).
- 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 letters prepared by C3;
- The State Fire Marshal's Letter confirming the LSC's compliance with the Maryland State Fire Prevention Code;
- The completed dealership information sheet from Appendix A2;
 and
- Copies of the Material Safety Data Sheets (MSDSs) for the NOX-Rust® 712AM and NOX-Rust® X128T materials (provided in the <u>Air Recordkeeping Section</u> 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 it to your local fire official.
- REMEMBER to submit the correct number of copies noted in Table 1 (beginning at page 51.).
- You may wish to consider calling (or visiting) your local fire code official before submitting the letter and attachments to let them know you will be making the submission.
- Note: To avoid confusion, make sure to send the letter and all attachments to ensure that the fire official has more than a verbal description of the LSC.

APPENDIX B2: Model Letter for Fire Code of Baltimore City and LSC Process Information to be included with Letter

ONLY FOR DEALERS IN THE CITY OF BALTIMORE

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

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[DEALER LETTERHEAD]

James S. Clack
Fire Chief
City of Baltimore Office of the Fire Marshal
410 E. Lexington St,
Baltimore, MD 21202

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

Dear Fire Chief Clack:

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 liquid as defined by the Maryland State Fire Prevention Code or the Fire Code of Baltimore City. 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. To that end, Toyota has contacted the State Fire Marshal, who has concurred that the LSC complies with the applicable Maryland State Fire Prevention Code requirements.

We have attached the following information to this letter to assist you with your evaluation of the LSC, including: (1) a description of the LSC process, materials and equipment, (2) an LSC Determination of Compliance with the Fire Code of Baltimore City prepared by Commercial Construction Consulting ("C3"), (3) the materials provided to the State Fire Marshal and the State Fire Marshal's response, and (4) site-specific information about the location where we will conduct the LSC. With this information and the State Fire Marshal's approval, 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] at [Number]. Thank you for your time and consideration.

Best regards, [Dealer]

[Dealership]

Attachments:

- C3 Determinations of Compliance, with description of LSC Process and MSDSs
- Approval of LSC from Maryland State Fire Marshal's Office
- · Dealership information sheet

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

771----



July 29, 2009

Toyota Motor Sales, U.S.A., Inc. 19001 South Western Avenue Torrance, CA 90501-1106

Attn: Sandra H. Waddell, Esq.

Managing Counsel - Environmental, Health & Safety

Re: Toyota Limited Service Campaign - Determination of Compliance With Applicable International

Fire Code Provisions in Baltimore City, Maryland

Dear Ms. Waddell:

Thank you for engaging Commercial Construction Consulting, Inc. ("C3") to determine compliance with applicable Maryland fire code regulations in advance of Toyota's implementation of a Limited Service Campaign ("LSC") involving the application of two anti-corrosion materials to the frame rails on the underside of certain Toyota vehicles. We understand that the LSC is being implemented by Toyota dealers in a number of Midwest and Eastern states, including Maryland.

Pursuant to your request, this letter evaluates the LSC's compliance with the fire code in Baltimore, Maryland, which has adopted the International Fire Code (IFC). As discussed in our analysis below, we have determined that the LSC program will be in compliance with the applicable provisions of the IFC governing the spray application of combustible liquids in approvable spraying spaces as adopted by Baltimore City.

Enc.



I. Project Overview

Toyota is in the process of implementing a Limited Service Campaign ("LSC") involving the application of two anti-corrosion sealant 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 (generally those that apply road salt in winter), including Maryland. The LSC involves a discrete group of vehicles covered by a customer support program. The LSC is already underway in several other states; it is intended that the LSC will begin in Maryland in October 2009 and it will conclude by October 2010.

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

II. Executive Summary

- The LSC is governed by the regulations found in the International Fire Code ("IFC"), the International Building Code ("IBC") and the International Mechanical Code ("IMC"), adopted by the City of Baltimore. Dealers will be provided with written instructions and technical support on how to select and set up an appropriate work space and implement the LSC in compliance with these regulations.
- The LSC will involve the spray application of two combustible liquids (both liquids have flash points in excess of 100°F one is a Class II and one is a Class IIIB), which will be applied to the vehicle frames in two separate, sequential operations. The liquids are classified as combustible and not flammable.
- The LSC materials are viscous and will be applied using a specialized spray gun (Vaupel HSDR 3300) that has a very high transfer efficiency (based on testing by the manufacturer and an independent third party laboratory), resulting in little to no overspray in the LSC application.
- The LSC materials will be applied in the same form (described in the MSDSs) as they are shipped to the dealers. The materials will not be diluted with any solvents or other chemicals and will not be mixed or combined with each other in any way. Each material will be applied using a dedicated spray gun to different portions of the vehicle frame rails.
- Under the IFC, the spray application of combustible liquids must take place in either a spray
 room, spray booth, or spray space. Because the LSC materials have to be applied while the
 vehicles are up on lifts to provide sufficient access to the frame rails, the LSC will not be
 conducted in a spray room or spray booth. Instead, the LSC will be conducted in regular
 vehicle services bays that meet the IFC standards for an approvable spray space.
- The LSC will not require the dealer to construct, enlarge, alter, repair, move, demolish, or change the occupancy of the dealership, and will not require the dealer to erect, install, enlarge, alter, repair, remove, convert or replace any electrical, gas, mechanical or plumbing system.
- Consistent with the IFC requirements applicable to spraying spaces, dealers will be instructed to conduct the LSC in an area that has adequate ventilation and is at least 20 feet from ignition sources. The spraying space will be surrounded by temporary partitions for facility clean up and to control overspray. These partitions will have a 12" gap at the bottom to ensure ventilation and prevent the possible accumulation of vapors. Dealers will also be instructed to provide at least one appropriately rated portable fire extinguishers within 75 feet of the spraying space.



Mechanical ventilation and automatic sprinkler protection are not required for the LSC spraying space. The IFC references the IBC to establish ventilation and sprinkler requirements for "spray spaces." Under the IBC, spraying spaces only require mechanical ventilation and automatic sprinklers if certain types of flammable liquids are being applied, which is not the case for the LSC.

III. Applicable Codes and Regulations

We have analyzed the 2006 International Fire Code ("IFC") as published by the International Code Council ("ICC"), which has been adopted in part as the fire code in the City of Baltimore. Baltimore has also adopted the 2006 IMC and IBC, and therefore these codes are also incorporated into this analysis. These three codes are evaluated below.

IV. IBC (2006), International Building Code

Regulation: Section 416 (Application of Flammable Finishes): Section 416.1 (General): The provisions of this section shall apply to the construction, installation and use of buildings and structures, or parts thereof, for the spraying of flammable paints, varnishes and lacquers or other flammable materials or mixtures or compounds used for painting, varnishing, staining or similar purposes. Such construction and equipment shall comply with the International Fire Code.

Analysis: The LSC process does not utilize paint, varnish, lacquer or other flammable material used for painting, varnishing, staining or similar purposes. The 2006 IBC Commentary indicates that "[t]he purpose of this section [416] is to provide requirements that address the hazards associated with spray applications and dipping or coating applications involving flammable (emphasis added) paints, varnishes and lacquers." The IBC Commentary then further indicates that the spray application of both flammable and combustible materials are addressed in the IFC.

The IBC operational provisions governing spray spaces address only the spray application of flammable paints, varnishes and lacquers and other flammable materials used for painting, varnishing, or staining; it does not address the spray application of combustible liquids. Since the LSC process uses combustible (but not flammable) liquids that are not paints, varnishes, or lacquers, Section 416 of the IBC does not apply to the LSC process.

V. IMC (2006), International Mechanical Code

The 2006 IMC is referenced by Section 416 of the IBC. Since Section 416 of the IBC does not apply for the LSC, the IMC references contained therein also do not apply for the LSC.

VI. IFC, International Fire Code

A. The LSC Materials are Combustible Liquids Under the IFC

Regulation: Section 3402.1 (Definitions): Combustible Liquid. A liquid having a closed cup flash point at or above 100°F (38°C). Combustible liquids shall be subdivided as follows: Class II: Liquids having a closed cup flash point at or above 100°F (38°C) and below 140°F (60°C)

Class IIIA: Liquids having a closed cup flash point at or above 140°F (60°C) and below 200 °F (93°C).

Class IIIB: Liquids having closed cup flash points at or above 200°F (93°C).

Analysis: The material Nox-Rust® 712AM has a flash point of greater than 200°C (392°F), 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).

Analysis: The materials will be applied separately to separate parts of the frame rails using dedicated spray guns – the 712AM is applied first to the interior of the frame rails, and then the X128T is applied to the exterior of the frame rails. The materials will be applied in the same form as they are described in their MSDS. The materials will not be mixed or combined with each other or with any other materials during the LSC process, nor does either material require any dilution or thinning with solvents or other chemicals.

B. The Spray Application of Combustible Materials is Governed by Chapter 15 of the IFC

Regulation: Section 1501.1 (Scope): This chapter shall apply to locations or areas where any of the following activities are conducted:

The application of flammable or combustible paint, varnish, lacquer, stain, fiberglass resins
or other flammable or combustible liquid applied by means of spray apparatus in continuous
or intermittent processes.

Analysis: Pursuant to Chapter 34 of the IFC, both of the materials used in the LSC are classified as combustible liquids. The LSC will involve the spray application of these materials to the frame rails of certain vehicles. Therefore, the provisions of Chapter 15 must be reviewed for applicability to the LSC process.

C. Location of Spray-finishing Operations

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

Analysis: Section 1504.2 of the IFC lists the locations in buildings where spray finishing operations may be conducted. Under the IFC, spray finishing may be conducted in a spray room, spray booth, or an approved spraying space. Spraying spaces are permitted in all buildings except those with Group A (Assembly), E (Educational), I (Institutional), or R (Residential) occupancies.

The LSC will take place in existing dealership service areas and not in a building with A, E, I or R occupancies. Because the LSC requires the vehicle to be on a lift to provide sufficient access to the vehicle's frame rails, it is impractical for the LSC to take place in a spray booth or spray room. This is why Toyota expects its dealers to conduct the LSC in a spraying space that meets all the applicable IFC requirements governing spraying spaces, as permitted by Section 1504.2.

Since the LSC will not occur in a spray booth or spray room, the provisions of IFC Chapter 15 that specifically address spray booths and spray rooms will not apply to LSC. Therefore, the remainder of this letter addresses the IFC provisions governing spray spaces.



D. Design and Construction of Approvable Spraying Spaces

Regulation: Section 1504.3.3: Spraying spaces shall be designed and constructed in accordance with the International Building Code and Section 1504.3.3.1 and 1504.4 through 1504.8 of this code.

Analysis: The dealers are expected to conduct the LSC in existing dealership services bays. The vehicle must be up on a lift in order to access the frame rails. Thus, the LSC does not require any physical changes to the building – there is no construction or alteration, no space is being reworked, there are no new fixtures, etc. - so it will not require the design and construction of a new "spraying space." Dealers will be instructed to ensure that the existing dealership service bays will meet the IFC requirements applicable to spraying spaces. These requirements are summarized in Subsections E, F, and G below.

E. Fire Protection of Spray Spaces

Regulation: Section 1504.4.1: Portable fire extinguishers complying with Section 906 shall be provided for spraying areas in accordance with the requirements for an extra (high) hazard occupancy.

Analysis: Dealerships will be instructed to ensure that fire extinguishers are in the vicinity of the spraying space. Because the LSC will take place in a spraying space expected to be significantly smaller than 1000 square feet, dealerships are being instructed to provide at least one appropriately rated portable fire extinguisher within 75 feet of the LSC operation.¹

F. Sources of Ignition

Regulation: Section 1503.2.2: Open flames and spark-producing devices shall not be located in flammable vapor areas and shall not be located within 20 feet of such areas unless separated by a permanent partition.

Analysis: Dealers will be instructed to conduct the LSC more than 20 feet from any open flames or spark-producing devices.

Regulation: Section 1504.6 (Sources of Ignition): Control of sources of ignition shall be in accordance with Sections 1503.2 and 1504.6.1 through 1504.6.2.4.

Analysis: Section 1504.6.1 addresses drying apparatus, which is not being used as part of the LSC. Section 1504.6.2 addresses lighting in the vicinity of spray spaces, spray booths or spray rooms; all such lighting is expected to meet provisions of this section.

G. Ventilation in Spray Spaces

Regulation: Section 1504.7 (Ventilation): Mechanical ventilation of flammable vapor areas shall be provided in accordance with Section 510 of the International Mechanical Code.

Regulation: Section 1502.1 (Definitions): Flammable Vapor Area: An area in which the concentration of flammable constituents (vapor, gas, fume, mist or dust) in air exceeds 25 percent of their lower flammable limit (LFL) because of the flammable finish processes operation. It shall include:

1. The interior of spray booths.

IFC Table 906.3(1).



- 2. The interior of ducts exhausting from spraying processes.
- 3. Any area in the direct path of spray or any area containing dangerous quantities of air-suspended powder, combustible residue, dust, deposits, vapor or mists as a result of spraying operations.
- 4. The area in the vicinity of dip tanks, drain boards or associated drying, conveying or other equipment during operation or shutdown periods.

The fire code official is authorized to determine the extent of the flammable vapor area, taking into consideration the material characteristics of flammable materials, the degree of sustained ventilation and the nature of the operations.

Analysis: We do not believe that the LSC operations will result in a flammable vapor area because:

- The LSC materials are viscous and will be applied with a very high transfer efficiency spray gun the Vaupel HSDR 3300. This spray gun has been demonstrated by the manufacturer and an independent third-party laboratory to be 99% and 93% efficient in application of the two LSC materials to the interior and exteriors of the frame rails, respectively; as a result, there will be little to no overspray from the LSC.
- The number of vehicles sprayed each day under the LSC will be limited;
- The materials will be sprayed one liter at a time, with time in between for refilling the spray bottle, allowing dispersion of any fumes or mist between the application of each bottle of material; and
- The LSC will be set up in a work area with adequate ventilation (dealers are being given specific instructions to select a work area that has adequate ventilation in the spraying space).

Additional information regarding the application process is attached, and more can be provided if and as needed.

VII. CONCLUSION

The LSC program is in compliance with the International Fire Code requirements governing the spray application of combustible liquids in an approvable spraying space. Under the IFC, spray operations must be conducted in either a spray booth, spray room, or spraying space. Due to the practical limitations on the LSC, dealers are being instructed to conduct the spraying operation in existing services bays that are set up in a manner compliant with all IFC requirements applicable to spraying spaces.

Dealers are being provided detailed instructions and technical support on how to conduct the LSC process to meet the applicable provisions of this code. An automatic fire protection system and mechanical ventilation are not required as the LSC does not fall within the scope of the IBC Section 416 relating to the spray finishing of certain flammable materials. Additionally, due to the nature of the LSC materials, the high efficiency method of application, and instructions provided to the dealer regarding adequate ventilation, it is not expected that the LSC will result in a flammable vapor area.



Please also refer to the LSC Overview and the Material Safety Data Sheets attached to this letter. If you have any questions, please do not hesitate to call.

Very truly yours,

Douglas R. Anderson

Doug Anderson Manager, Code Advisory Group

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Limited Service Campaign ("LSC") Overview

LSC PROCESS STEP 1 - VEHICLE PREPARATION

- Preparing the Vehicle Frame:
 - Vehicle preparation requires no chemicals, solvents, or oils.
 - Pressure wash frame rails (if necessary).
 - Place vehicle on lift (Exhibit A).
 - If vehicle work area is within 20 feet of an adjacent bay, install partition (with 12" opening at the bottom) around the LSC 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 and 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 one-liter (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 rails. Nox-Rust® 712AM: Flash Point > 200°C (392°F) (Class IIIB combustible; HMIS fire hazard rating of 1).²
 - Three liters of the second material Nox-Rust® X128T are applied to the exterior of the vehicle frame rails. Nox-Rust® X128T: Flash Point 105° F (Class II combustible; HMIS fire hazard rating of 2).³ 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.

8

The transfer efficiency of the LSC spray gun applying the 712AM material is 99%.

The transfer efficiency of the LSC spray gun applying the X128T material is 93%.

LSC PROCESS OPERATIONS SUMMARY

- The LSC will be conducted consistent with IFC requirements:
 - There will be adequate ventilation in the service area where the LSC will be conducted.
 - The materials are nonflammable.
 - There will be no open flames or spark-producing equipment or appliances within 20 feet of the LSC operation.
 - There will be no drying, curing, or fusion apparatus within 20 feet of the LSC operation.
 - There will be properly rated fire extinguishers provided within 75 feet of the LSC spraying space.
 - Any combustible floor construction in the spraying area will be covered with Fire Retardant Poly Sheeting (e.g., TRM 'WEATHER-ALL' Flame Retardant Film).

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

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Exhibit A: Vehicle Setup

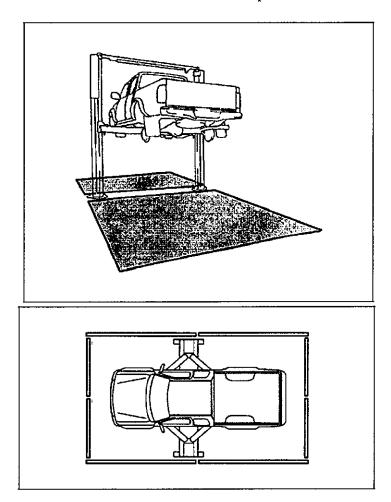
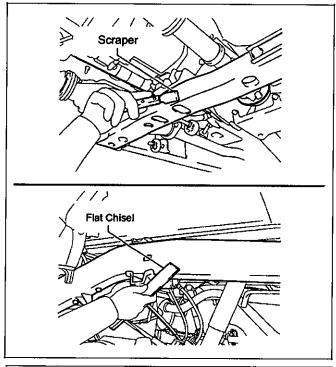
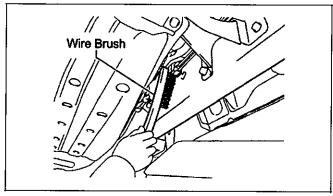
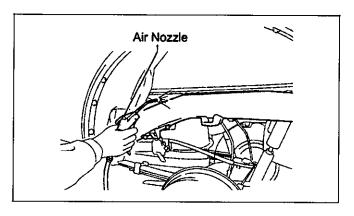


Exhibit B: Vehicle Preparation

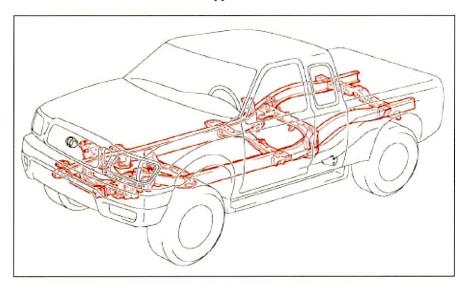


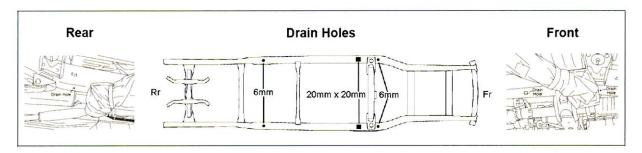




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Exhibit C: Application Locations





ATTACHMENT 2: MATERIALS PROVIDE TO STATE FIRE MARSHAL AND STATE FIRE MARSHAL'S RESPONSE

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July 29, 2009

Toyota Motor Sales, U.S.A., Inc. 19001 South Western Avenue Torrance, CA 90501-1106

Attn: Sandra H. Waddell, Esq.

Managing Counsel - Environmental, Health & Safety

Re: Toyota Limited Service Campaign, State of Maryland

Compliance with the Uniform Fire Code

Dear Ms. Waddell:

Thank you for engaging Commercial Construction Consulting, Inc. ("C3") to determine compliance with applicable Maryland fire code regulations in advance of Toyota Motor Sales' implementation of a Limited Service Campaign ("LSC") involving the application of two anti-corrosion sealant materials to the frame rails on the underside of certain Toyota vehicles. We understand that the LSC will be implemented by Toyota dealers in a number of Midwest and Eastern states, including Maryland. We also understand that the LSC involves a discrete group of vehicles covered by a customer support program and is already underway in certain other states; it is intended that the LSC will begin in Maryland in August 2009 and it will conclude by October 2010.

Pursuant to your request, this letter evaluates the LSC's compliance with the fire code in those local Maryland jurisdictions that have adopted the NFPA, Uniform Fire Code. As you will see in our analysis below, we have determined that the LSC program will be in compliance with the applicable provisions of the 2006 edition of NFPA 1, Uniform Fire CodeTM and the 2003 edition of NFPA 33, Standard for Spray Application for Flammable or Combustible Materials, adopted by certain Maryland jurisdictions where the LSC will be conducted.

Enc.



I. Project Overview

Toyota is in the process of implementing a Limited Service Campaign ("LSC") 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 Maryland. 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 intended that the LSC will begin in Maryland in August 2009 and it will conclude by October of 2010.

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

II. Executive Summary

- The LSC is governed by the regulations found in NFPA-1 (2006), the Uniform Fire Code.
 Dealers will be provided with written instructions on how to implement the LSC in compliance with these regulations.
- The LSC will involve the spray application of two combustible materials (both materials have flash points in excess of 100°F one is a Class II and one is a Class III), which will be applied to the vehicle frames in two separate, sequential operations. The materials are not flammable.
- The LSC materials are viscous and will be applied using a specialized spray gun
 (Vaupel HSDR 3300) that has a very high transfer efficiency (based on testing by the
 manufacturer and an independent third party laboratory), resulting in very little overspray.
- The materials will be applied while the vehicles are up on lifts, in regular vehicle service bays
 provided with adequate ventilation. The LSC will not be conducted in a spray room or spray
 booth, but will be conducted in an approvable spray space consistent with the requirements
 of NFPA-33 (2003).
- The LSC will not require the dealer to construct, enlarge, alter, repair, move, demolish, or change the occupancy of the dealership, and will not require the dealer to erect, install, enlarge, alter, repair, remove, convert or replace any electrical, gas, mechanical or plumbing system.
- The LSC spraying space will meet applicable requirements. Dealers will be instructed to set it up in an area with adequate ventilation that is at least 20 feet from ignition sources. The spraying space will be surrounded by temporary partitions for facility clean up and to control overspray. The temporary partitions around the spray space will have a 12" gap at the bottom to prevent the possible accumulation of vapors.
- Mechanical ventilation and automatic sprinkler protection are not required for the LSC spraying space, as the LSC process meets all the requirements of NFPA-33 (2003) for the spray application of vehicle undercoating.



III. Applicable Codes and Regulations

This analysis is intended for use in those local Maryland jurisdictions that have adopted a version of the NFPA-1 as published by the National Fire Protection Association (NFPA). This analysis is based on the 2006 version of NFPA-1, which has been adopted in part as the fire code in the State of Maryland.

IV. NFPA-1 (2006), Uniform Fire CodeTM

Regulation: Section 43.1.1: Operations involving the spray application of flammable and combustible materials shall comply with NFPA 33, Standard for Spray Application Using Flammable or Combustible Materials, and Section 43.1.

Analysis: This provision requires installations and operations to be in compliance with Section 43.1, Spraying, Dipping, and Coating Using Flammable or Combustible Materials, and NFPA 33 (2003).

Regulation: Section 43.1.4.1.3: Vehicle undercoating and body lining operations shall also meet the requirements of Section 14.1 of NFPA 33, Standard for Spray Application Using Flammable or Combustible Materials.

Analysis: This provision requires installations and operations to be in compliance with Section 14.1, Vehicle Undercoating and Body Lining, of NFPA-33 (2003).

V. NFPA-33 (2003), Standard for Spray Application Using Flammable or Combustible Materials

Regulation: 3.3.7.1 Combustible Liquid. A combustible liquid shall be defined as any liquid that has a closed-cup flash point at or above 37.8°C (100°F), as determined by the test procedures and apparatus set forth in 1.7.4. Combustible liquids shall be classified as Class II or Class III as follows:

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

Class IIIA. Any liquid that has a flash point at or above 60°C (140°F), but below 200°F (93°C). Class IIIB. Any liquid that has a flash point at or above 93°C (200°F).

Analysis: The material Nox-Rust® 712AM has a flash point of greater than 200°C (392°F), 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 8.2.1 (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. Any single cabinet shall contain not more than 454 L (120 gal) of Class I, Class II, or Class IIIA liquids, of which not more than 227 L (60 gal) shall be Class I and Class II liquids.

Regulation: Section 8.2.2: 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 (1) or (2), whichever is greater:

- (1) A supply for one day
- (2) 95 L (25 gal) of Class IA liquids in containers, plus 454 L (120 gal) of Class IB, IC, II, or III liquids in containers, plus 2 portable tanks each not exceeding 2500 L (660 gal) of Class IB, Class IC, Class II, or Class IIIA liquids, plus 20 portable tanks each not exceeding 2500 L (60 gal) of Class IIIB liquids

Analysis: The LSC materials 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 (one such kit for each vehicle). The dealers will be instructed to store these materials in accordance with the requirements of NFPA 30.

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

- 14.1.1: Spray undercoating or spray body lining of vehicles that is conducted in an area that has adequate natural or mechanical ventilation shall be exempt from the provisions of this standard, if all of the requirements of 14.1.1.1 through 14.1.1.4 are met.
- 14.1.1.1: There shall be no open flames or spark-producing equipment within 6100 mm (20 ft) of the spray operation while the spray operation is being conducted.
- 14.1.1.2: There shall be no drying, curing, or fusion apparatus in use within 6100 mm (20 ft) of the spray operation while the spray operation is being conducted.
- 14.1.1.3: Any solvent used for cleaning procedures shall have a flash point not less than 37.8°C (100°F).
- 14.1.1.4: The coating or lining materials used shall meet one of the following criteria:
 - (1) Be no more hazardous than UL Class 30-40, when tested in accordance with UL 340, Test for Comparative Flammability of Liquids
 - (2) Not contain any solvent or component that has a flash point below 37.8°C (100°F)
 - (3) Consist only of Class IIIB liquids and not include any organic peroxide catalyst

Analysis: During LSC spraying operation no open flames or drying apparatus will be within 20 feet; therefore, the requirements of 14.1.1.1 and .2 will be met. Section 14.1.1.3 does not apply because the LSC does not involve any cleaning procedures. Finally, Section 14.1.1.4 requires that automobile undercoating materials meet one of the three criteria listed in that Section. The LSC materials all have flash points greater than 100°F; therefore, they meet the requirements of Section 14.1.1.4(2). Since the LSC satisfies 14.1.1.4(2) and the regulation only requires compliance with one of three subsections of 14.1.1.4, Sections 14.1.1.4(1) and (3) do not apply to the LSC. As a result, the application of the LSC materials does not require a spray booth, nor are automatic sprinklers required.



VI. CONCLUSION

The LSC program is in compliance with the requirements of the Maryland Fire Prevention Code, NFPA-1 (2006) and NFPA-33 (2003), governing the spray application of combustible materials. Dealers are being provided detailed instructions on how to conduct the LSC process to meet the applicable provisions of these codes. An automatic fire protection system and mechanical ventilation is not required as the LSC falls within the scope of NFPA-33 (2003) Section 14.1 relating to the spray finishing of automobile undercoating materials.

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

Very truly yours,

Douglas R. Anderson

Douglas R. Anderson Manager, Code Advisory Group

M:_All Code\Code Projects 2009\Toyota\Maryland\Toyota LSC C3 MD NFPA overview July 29 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.
 - Pressure wash frame (if necessary).
 - Place vehicle on lift (Exhibit A).
 - If vehicle work area is within 20 feet of an adjacent bay, set up partition (with a 12" opening at bottom) around the LSC 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 and 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 rails. Nox-Rust® 712AM: Flash Point >200° C (392° F) (Class IIIB combustible; HMIS fire hazard rating of 1). The spray gun has a 99% transfer efficiency for application of the interior material.
 - Three liters of the second material Nox-Rust® X128T are applied to the exterior of the vehicle frame rails. Nox-Rust® X128T: Flash Point 105° F (Class II combustible; HMIS fire hazard rating of 2). The spray gun has a 92.5% transfer efficiency for application of the exterior material. 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.



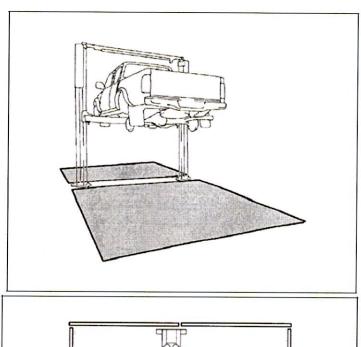
LCS PROCESS OPERATIONS

- 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 materials are nonflammable
 - There will be no open flames or spark-producing equipment or appliances within 20 feet of the LSC operation
 - There will be no drying, curing, or fusion apparatus within 20 feet of the LSC operation
- Furthermore, the dealer will take additional precautions including:
 - Fire extinguishers will be provided in the vicinity of the LSC operation
 - Any combustible floor construction in the spraying area will be covered with Fire Retardant Poly Sheeting (e.g., TRM 'WEATHER-ALL' Flame Retardant Film)

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



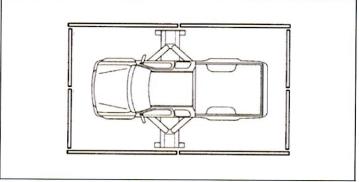
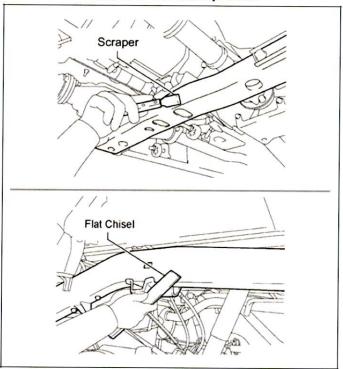
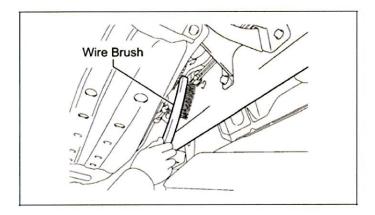




Exhibit B: Vehicle Preparation







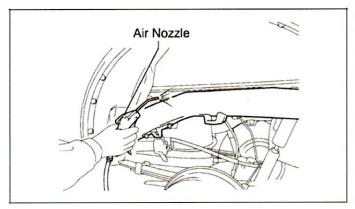
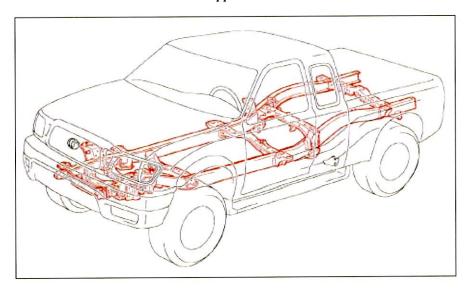
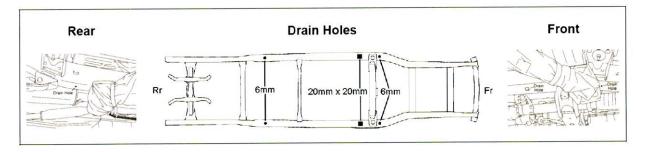




Exhibit C: Application Locations







To <Sandra_Waddell@toyota.com>

cc "State Fire Marshal Barnard" <wbarnard@mdsp.org>

bcc

Subject RE: Toyota Limited Service Campaign - Your Review Requested

Ms. Waddell:

I have the reviewed the document from Commercial Construction Consulting.

It appears that everything is in compliance with NFPA 1, 30, and 33. It is very important that the storage arrangements comply with the requirements of NFPA 30.

Toyota may encounter more stringent standards or amendments in the metropolitan counties of Maryland. The local amendments and contact information can be found at www.mdcodes.org.

Please feel free to contact me personally if you have any questions or concerns.

Best Regards,



J. Dennis Gentzel, P. E.
Chief Fire Protection Engineer
Department of State Police
Office of the State Fire Marshal
1201 Reisterstown Road
Pikesville, MD 21208-3899
410-653-8980
800-525-3124
410-653-8988 Fax

From: William E. Barnard [mailto:wbarnard@mdsp.org]

Sent: Thursday, July 30, 2009 9:24 AM **To:** Sandra_Waddell@toyota.com

Cc: dgentzel@mdsp.org

Subject: RE: Toyota Limited Service Campaign - Your Review Requested

July 30, 2009

Sandra H. Waddell, Esq.
Managing Counsel - Environmental, Health and Safety
Toyota Motor Sales, U.S.A., Inc.
19001 S. Western Ave. – HQ11
Torrance, CA 90501

Dear Ms. Waddell:

The information you provided concerning the Limited Service Campaign has been received. I have asked Chief Fire Protection Engineer Dennis Gentzel to promptly review the materials and provide me with his recommendations. Office of the State Fire Marshal appreciates your approach to this program. If you have any questions or concerns, please contact me.

William E. Barnard, CFPS Maryland State Fire Marshal 800-525-3124 – Office 443-336-7369 - Mobile

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 consistent with the requirements identified in C3's letter.
Insert a description of the method of ventilation in the vehicle service area where the LSC will be conducted.

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[INSERT MSDSs]

IMPORTANT!

Please be sure you attach copies of the MSDSs (see <u>Air Recordkeeping Section</u>) to the letter being submitted to your local Fire Marshal.

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

MARYLAND DEALER INFORMATION PACKET FEDERAL, STATE AND LOCAL REQUIREMENTS GUIDE REGULATED WASTE MANAGEMENT SECTION

The waste produced as a result of the LSC operations may qualify as regulated hazardous waste (e.g., excess LSC materials, clean up rags, etc.), because the LSC materials are combustible (i.e., they are assumed to qualify as regulated "hazardous" waste). However, the LSC is not expected to 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) because the quantities of regulated waste generated by the LSC operations should be relatively small assuming that:

 You store the spray guns properly when they are not in use as described in the Technical Instructions (so that the spray guns do not need to be cleaned, which would generate waste); and

REMINDER: Consistent with the Technical Instructions, the Maryland Department of Environment's conditional approval for the LSC requires that you enclose the tips and nozzles of the spray guns in plastic or some other material when they are not in use.

2) You reuse the LSC tarps (floor coverings) and work area partitions (so as to avoid frequent disposal of these items which would generate larger quantities of waste, which may impact your generator status).

If you do the two things above, then the only regulated waste produced by the LSC would consist of rags used to clean the LSC work area and any excess quantities of the LSC materials. These materials should be handled in the same manner as other regulated waste at your dealership. This section provides a brief overview of the regulated waste requirements applicable to dealerships generally.

REGULATORY NOTE REGARDING LSC TARPS AND PARTITIONS: The tarps/partitions used during the LSC process should be handled like other regulated waste when you dispose of them. The weight of these tarps counts against the monthly regulated waste management limits noted in Section 2 below. Given their size and weight, the tarps/partitions could represent a large quantity of waste if disposed of frequently and could impact your compliance with the limits noted below. Therefore, we recommend that you reuse the tarps and other materials used to create the partitions described in the **Technical Instructions**.

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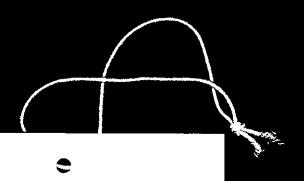
- 1. IF YOU ARE ALREADY A <u>FULLY REGULATED GENERATOR</u> (A.K.A. LQG) (I.E., BECAUSE YOU GENERATE MORE THAN 220 POUNDS OF REGULATED WASTE PER MONTH), YOU MAY STOP READING AS YOU ARE LIKELY ALREADY FAMILIAR WITH THE REQUIREMENTS NOTED BELOW. THE LSC SHOULD NOT IMPACT YOUR GENERATOR STATUS (SEE NOTE ABOVE).
- 2. If you are not a Fully Regulated Generator, <u>Do Not</u> 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 should not impact your generator status (see note above).
 - a. Your dealership will not have to become a registered Fully Regulated Generator (and thereby be subject to additional requirements) if you stay below the two registered Fully Regulated Generator triggers:
 - (1) Generate no more than 220 pounds of regulated waste in a calendar month; and
 - (2) Accumulate no more than 2,200 pounds of regulated waste at any one time.

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

- 3. NEVER ACCUMULATE MORE THAN 2,200 POUNDS (APPROX. 270 GALLONS) OF REGULATED WASTE AT ANY ONE TIME.
- 4. STORE ALL REGULATED WASTES IN APPROPRIATE CONTAINERS ON AN IMPERVIOUS SURFACE; LABEL CONTAINERS PROPERLY AS "HAZARDOUS WASTE;" AND MAINTAIN THE REQUIRED WASTE GENERATION RECORDS.
- 5. 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.

Important Compliance Note. The monthly waste accumulation limit applies separately to each part of your dealership that has its own address.

- 6. REMEMBER TO COUNT USED OIL AGAINST YOUR MONTHLY REGULATED WASTE LIMIT IF YOU DETERMINE IT TO BE HAZARDOUS OR IF IT HAS BEEN BLENDED, MIXED, COMMINGLED OR OTHERWISE TREATED WITH ANY HAZARDOUS WASTE.
 - a. In addition, waste oil and used oil should not be blended, mixed, commingled, or otherwise treated with any other hazardous waste. If it is, it must be counted against the applicable regulated waste limit note above.



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 parafin wax. You may notice a small amount of whitish-colored droplets from the internal application.
If dripping occurs on concrete:

- 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.

00411-09001