

TOYOTA

TO: TENNESSEE DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

DATE: 2012

RE: Information Packet for Corrosion-Resistant Compound ("CRC") Campaign C0D

SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

TENNESSEE/VIRGINIA DEALER INFORMATION PACKET (FOR TENNESSEE DEALERS SERVICING VIRGINIA-REGISTERED SEQUOIAS)

Toyota is launching a Corrosion-Resistant Compound ("CRC") Campaign for 2001-2004 model year ("MY") Sequoia vehicles registered in certain cold climate states with high road salt use ("Cold Climate States"). For ease of reference, this Campaign will be referred to by its assigned internal designation -- "C0D".

For the Sequoia C0D, your dealership will use the same two Vaupel HSDR 3300 spray guns already issued to you for the Tundra B0D to apply the same CRC materials now being used for the B0D – *i.e.*, 712 AM and Noxudol 300 S. You will apply these CRCs in the same spray space already being used for the B0D.

Applying the CRC materials and using the Vaupel HSDR 3300 spray gun raises compliance obligations under federal, state and/or local laws related to ***air emissions, fire code approval and recordkeeping***. The Tundra B0D Dealer Information Packet ("B0D Packet") contained a detailed explanation of these compliance obligations. This Sequoia C0D Dealer Information Packet does not repeat that extensive discussion, but instead assumes your familiarity with these obligations and identifies the steps that Toyota Motor Sales, U.S.A., Inc. ("TMS") recommends you undertake to assure your dealership's continued compliance with these obligations while conducting the Sequoia C0D.

Please review this Dealer Information Packet carefully. If, after reviewing this Packet, you have any questions or concerns, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

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Step One

Before You Begin The Sequoia C0D, Re-Review the Tundra B0D Dealer Information Packet.

1. Due to the substantial similarities between the Sequoia C0D and the Tundra B0D, this Dealer Information Packet does not repeat the extensive discussion of legal requirements set forth in the B0D Packet.
2. Instead, it is expected that you will carefully and fully re-review the B0D Packet prior to starting the Sequoia C0D, so that you understand all steps your dealership must take to comply with the applicable legal requirements while conducting the Sequoia C0D.
3. You received a copy of the B0D Packet previously, but in the event you need an additional copy, that Packet is available for download on the C.L.E.A.N. Dealer Website (<http://cleandealer.com>).

Step Two

Before You Begin The Sequoia C0D, Confirm That Your Dealership Satisfies All Of The Criteria Set Forth Below.

1. **Your dealership should conduct the Sequoia C0D in the same spray space currently being used for the Tundra B0D and in accordance with the Technical Instructions for the Sequoia C0D.**
 - a. The spray space currently being used for the Tundra B0D has already been approved by your local fire code enforcement official.
 - b. To operate consistent with this approval, you must conduct the Sequoia C0D in the same spray space currently being used for Tundra B0D and do so in accordance with the Technical Instructions for the Sequoia C0D.
 - c. If your dealership is not participating in the Tundra B0D, or if it will not conduct the Sequoia C0D in the same spray space currently being used for Tundra B0D, you will need a new approval from your local fire code enforcement official. Please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.
2. **Your dealership will remain exempt from air permitting by continuing to comply with all applicable air regulatory requirements as set forth in the Tundra B0D Packet.** These requirements are summarized below. You should refer to the B0D Packet for details.
 - a. Your dealership does not currently have an air permit issued by the Tennessee Air Pollution Control Board.
 - b. Your dealership continues to keep its potential to emit (PTE) for Volatile Organic Compounds ("VOCs") and Particulate Matter ("PM") below the levels that would trigger air permitting, *i.e.*, 100 tons per year (tpy) for VOCs and 100 tpy for PM. Your dealership's PTE should fall well below these thresholds as long as you:

- i. Do **not** operate a very large on-site or off-site body shop; and
 - ii. Do **not** otherwise engage in substantial spraying, coating, painting or other activities that involve applying VOC-containing materials with spray guns.
- c. **Your dealership submits to the Tennessee Air Pollution Control Board (TAPCB) a Notification for Designation of the Sequoia C0D and any future CRC campaigns as an “Insignificant Activity” and receives a written determination from TAPCB.** (Appendix B contains instructions and a form letter that you can use to make such Notification.)
- i. **You must submit this Notification at least 30 Days before you intend to start the Sequoia C0D.**
 - ii. **You may NOT begin the C0D until you receive a written determination from TAPCB confirming that the C0D qualifies as an “Insignificant Activity”.**
- d. Your dealership will continue to restrict vehicle processing in order to comply with hourly PM emissions limits as follows:
- (1) **Process no more than one Tundra every 2 hours.**
 - (2) **Process no more than one Sequoia every 2 hours.**

Please refer to Appendix D of this Packet for guidance on how to follow these vehicle processing restrictions.

3. Your dealership should

- i. **notify the local fire code enforcement official of your plans to apply CRCs to additional vehicle models besides Tundra and**
- ii. **continue to comply with all applicable fire, building and zoning code requirements as set forth in the Tundra B0D Packet.**

These requirements are summarized below. You should refer to the Tundra B0D Packet for details.

- a. As noted above, your dealership should conduct the Sequoia C0D in the spray space that already has been approved by the local fire code enforcement official and is now being used to conduct the Tundra B0D.
- b. As a courtesy, TMS recommends that you provide notice to the local fire code enforcement official **in writing** that your dealership plans to apply CRC materials to vehicle models other than Tundra in this previously approved spray space. Appendix A of this Packet contains a letter that you can use to provide such notice.

- c. If, when approving your spray space, the local fire code enforcement official issued you a conditional permit or approval that established special requirements or restrictions, then you must:
 - i. confirm that the permit or approval is not time-, vehicle- or CRC material-limited in such a way that it will not apply to the Sequoia COD¹ and
 - ii. continue to comply with the special requirements or restrictions in the permit or approval.
- d. Your dealership also must continue to comply with any additional environmental, health, safety and zoning requirements identified for your local jurisdiction in "Table 1" of the B0D Packet.
- e. During application of the CRCs in the spray space approved by the local fire code enforcement official, your dealership must:
 - i. Maintain adequate ventilation in the spray space and surrounding area.
 - ii. Have no open flames, spark-producing equipment, or drying, curing, or fusion apparatuses within 20 feet of the spray space.
 - iii. Have fire extinguishers rated "B", "AB", or "ABC" within 30 feet of the spray space.
 - iv. Follow best management practices for handling and storage of the CRC materials.

If you cannot satisfy all of the foregoing criteria in Step Two above, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

Step Three Before You Begin The Sequoia COD, Complete The Readiness Checklist Process

1. For Tacoma LSC 90D and Tundra B0D, you completed a detailed Readiness Survey to confirm that your dealership was ready to begin each of the campaigns. As long as your dealership will conduct the Sequoia COD in the spray space that already has been approved by the local fire code enforcement official (and is now being used to conduct the Tundra B0D) and will otherwise satisfy the requirements in Steps One and Two above, then you may use a more simple Readiness Checklist process. To complete the Readiness Checklist process and confirm that your dealership is ready to begin conducting the Sequoia COD, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>).
2. Only after completing the Readiness Checklist process will your dealership be able to order kits with the CRC materials for the Sequoia COD.

¹ If you are facing this situation, or you have any questions on this point, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) for assistance.

Step Four

You Can Now Begin Conducting The Sequoia C0D, But Do So In Compliance With The Requirements Set Forth Below.

- 1. Adhere to the vehicle processing limits discussed in Step Two above by not processing more than one Tundra every 2 hours or one Sequoia every 2 hours.** As explained further below, please use the new “Sequoia and Tundra Daily Production Log” in Appendix C of this Packet for both the Tundra B0D and the Sequoia C0D to document that you are following these vehicle processing restrictions. Also, Appendix D of this Packet includes guidance on how to follow these vehicle processing restrictions.
- 2. Comply with the air recordkeeping obligations that apply to both the Tundra B0D and the Sequoia C0D, including by using the new “Sequoia and Tundra Daily Production Log” provided in Appendix C of this Packet.**
 - a. The B0D Packet details the air recordkeeping obligations that apply to CRC Campaigns. Your dealership must comply with these same obligations when conducting the Sequoia C0D.²
 - b. Appendix C to this Packet provides a new “Tundra and Sequoia Daily Production Log”. Such a Log was not included in the Tundra B0D Packet, but you should start using this Log to track the number of vehicles processed under the Tundra B0D and the resulting air emissions. You also should use the Log for the Sequoia C0D.
 - c. Your dealership should also keep copies of the following with your completed “Tundra and Sequoia Daily Production Log” forms:
 - i. The Notification for Designation of the Sequoia C0D as an “Insignificant Activity” that you submit to TAPCB and its accompanying attachments;
 - ii. The written determination that you receive from TAPCB in response to the Notification that Sequoia C0D qualifies as an “Insignificant Activity”; and
 - iii. Documents identified in the Tundra B0D Packet.

² Please note that although your dealership must comply with hazardous waste requirements generally, the materials associated with the Tundra B0D and the Sequoia C0D do not constitute “hazardous waste” when discarded. As such, neither the Tundra B0D nor the Sequoia C0D will generate hazardous waste or impact your dealership’s hazardous waste generator status.

The steps outlined above, in conjunction with the more detailed explanation provided in the Tundra BOD Packet, should help to assure that your dealership conducts both the BOD and the Sequoia COD in compliance with the relevant federal, state, and local requirements. This Sequoia COD Dealer Information Packet is not intended to cover other air, waste management, hazardous material, water, or other environmental laws and regulations that might apply to operations at your dealership other than the application of CRC materials as part of the Tundra BOD or Sequoia COD. We assume that you already comply with other environmental, health, and safety requirements that apply to your facility.

If you have any questions after reviewing this Dealer Information Packet and the BOD Packet, or the Technical Instructions, please go to the C.L.E.A.N. Dealer website (<http://cleanddealer.com>) or call the EH&S Hotline (877-572-4347).

Thank you for your cooperation.

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

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TENNESSEE DEALER INFORMATION PACKET

APPENDIX A –FIRE OFFICIAL MODEL OUTREACH LETTER

The B0D Packet directed you to notify your local fire code enforcement official, in writing, of your intention to use the same space that had been previously approved for conducting the Tacoma LSC 90D, to spray a less-combustible CRC (Noxudol 300 S) on certain MY Tundra vehicles. Prior to conducting the Sequoia C0D, TMS recommends that you provide one additional notice informing your local fire code enforcement official that your dealership intends to apply CRCs to additional vehicle models besides Tundra in this same spray space.

TMS has prepared a model letter that you can customize and use to provide this notice. Contact information for your local fire code enforcement official can be found in Table 1 of the B0D Packet. Please remember that you must send this letter **before** you begin conducting the Sequoia C0D.

Please note that the model letter refers to "CRC program" (instead of the Sequoia C0D) to ensure that the notification to your local fire code enforcement official covers not only the Sequoia C0D, but also any CRC program that may be offered for Toyota vehicles in the future when conducted in the same space that you are now using for Tundra B0D.

An Electronic Copy of This Letter is Available on the C.L.E.A.N. Dealer website –

<http://cleandealer.com>

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[DEALER LETTERHEAD]

[Insert Date]

[Insert Appropriate Local Fire Code Enforcement Official Contact Information from Table 1 of the Tundra BOD Packet]

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

Dear _____:

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

We contacted you last year to notify you that we would begin conducting a separate CRC program for certain Model Year (MY) Tundra vehicles and would be applying a less combustible, Class IIIB CRC material known as Noxudol 300 S to the exterior portion of the frame. As we noted at the time, Noxudol 300 S has a much higher flash point (285°F) as compared to the exterior material used for the Tacoma LSC (Nox-Rust® X128T, which has a flash point of 105°F). Noxudol 300 S also has the added advantage, from an environmental perspective, of being much lower in volatile organic compounds (VOCs) than the X128T material.

Toyota has now expanded the CRC program to include certain additional vehicles, and we intend to offer the expanded CRC program to our eligible customers. As with the Tundra program, eligible vehicles will be treated with 712AM material and Noxudol 300 S or similar Class IIIB liquids. Thus, the CRC program will involve application of only Class IIIB combustible liquids.

We also wanted to take this opportunity to inform you that as a result of the Tacoma LSC having expired on December 31, 2011, our dealership has discontinued the application of any Class II combustible liquids to Toyota vehicles and will only be applying Class IIIB combustible liquids for the CRC program.

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

Sincerely,

[Insert Dealer Name]

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SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

TENNESSEE DEALER INFORMATION PACKET

APPENDIX B – NOTIFICATION FOR DESIGNATION OF
SEQUOIA C0D AS “INSIGNIFICANT ACTIVITY”

INSTRUCTIONS

1. Your dealership may not begin the Sequoia C0D until you:
 - a. Submit the attached “Notification for Designation of the Sequoia C0D as an Insignificant Activity” to the Tennessee Air Pollution Control Board (“TAPCB”); and
 - b. Receive a “Determination of Agreement” from the TAPCB that the Sequoia C0D is an insignificant activity.
2. Your dealership should submit the Notification for Designation at least 30 days before the estimated starting date of the Sequoia C0D.
3. To prepare the Notification For Designation:

Please go to the C.L.E.A.N Dealer website (<http://cleandealer.com>) for electronic copies of the Notification for Designation letter and its attachments.

- a. Put the Notification for Designation on your dealership's letterhead.
 - b. Insert the proper date.
 - c. Have the Notification of Designation signed by your dealership's General Manager.
 - d. Add Attachments 1 – 3 to the Notification.
4. **Send the Notification of Designation and Attachments to:**

Technical Secretary
Tennessee Air Pollution Control Board
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243
Attention: John A. Trimmer, Chief, East Tennessee Permit Program

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[insert dealership letterhead]

_____, 2012

Technical Secretary
Tennessee Air Pollution Control Board
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243

Attention: John A. Trimmer
Chief, East Tennessee Permit Program

Re: **Notification for Designation as "Insignificant Activity" Pursuant to TENN. COMP. R. & REGS. 1200-03-09.04(4)(a) for Toyota Corrosion-Resistant Compound Campaign**

Dear Technical Secretary:

Toyota of Bristol submits this written notification, pursuant to TENN. COMP. R. & REGS. 1200-03-09.04(4)(a), in connection with the Toyota Motor Sales, U.S.A., Inc. ("Toyota") Corrosion Resistant Compound ("CRC") campaign for certain model year Sequoia vehicles (the "Sequoia Campaign") along with similar future CRC campaigns that we would like to conduct at our dealership (the "Future Campaigns"). Notably, the Sequoia Campaign and any Future Campaigns will have emissions comparable to (or lower than) the "Tundra B0D" and "Tacoma LSC" Campaigns that the Tennessee Air Pollution Control Board ("TAPCB") previously determined to be "insignificant activities" via letters dated October 11, 2011 and August 4, 2009.

Significantly, although the Sequoia and Future Campaigns will involve the same CRCs and Vaupel HSDR 3300 spray guns used in the Tundra B0D campaign, this submission differs slightly from our prior submissions. Previously, each campaign's potential to emit ("PTE") was based on the total number of vehicles subject to the individual campaign ("units in operation" or "UIO"). This was appropriate since the limited number of vehicles eligible for each CRC campaign provided an inherent limitation on emissions from each program. However, the UIO-based approach did not allow for a more general (non-vehicle specific) determination since the PTE calculation relied upon information specific to the vehicles and model years included in each new campaign.

As an alternative, Toyota has now developed a "maximum CRC operating scenario" – covering the Sequoia Campaign and any Future Campaign – that allows us to use a more traditional 24/7/365 PTE calculation to demonstrate that the Sequoia C0D, alone or in combination with each Future Campaign, is an insignificant activity. We now seek a determination of agreement from the TAPCB that, based on the "maximum CRC operating scenario," the CRC campaigns, including the Sequoia Campaign and any Future Campaign, qualifies as an "insignificant activity" regardless of the number of vehicles eligible for those programs.

In support of this request, I am pleased to provide further information in following documents:

1. Attachment 1: Introduction, Overview and Air Emissions Calculations.
2. Attachment 2: Copies of the TAPCB's October 11, 2011 and August 4, 2009 insignificant activity determination letters.
3. Attachment 3: MSDS for Parker 712AM and Noxudol 300 S, the two CRCs to be applied to the vehicle frames.

In sum, as set forth in detail in Attachment 1 to this letter, this maximum operating scenario assumes 1) that all Future Campaigns would use no more than 3 liters each of the two CRCs, and, 2) very conservatively, that the CRC applications for any single vehicle will be completed within one hour. As reflected in the table below, based on these assumptions and continuous 24/7/365 operations, the PTE for the Sequoia and any Future Campaign will be well below the threshold for insignificant activities under Rule 1200-03-09.04(4)(a) -- even if a dealer conducts the campaigns in two service bays operating simultaneously.

	Maximum CRC Operating Scenario (One Bay)	Maximum CRC Operating Scenario (Two Bays)
VOCs		
Per Vehicle (lbs)	0.20	0.20
Per Day (lbs)	4.85	9.70
PTE (tons/year)	0.88	1.76
PM		
Per Vehicle (lbs)	0.12	0.12
Per Day (lbs)	2.80	5.60
PTE (tons/year)	0.51	1.02

Accordingly, Toyota of Bristol now seeks a determination of agreement from TAPCB that the Sequoia COD and all Future CRC Campaigns conducted in accordance with the "maximum CRC operating scenario" qualifies as an exempt "insignificant activity" under Rule 1200-03-09.04(4)(a).

We would appreciate your prompt attention to this matter. If you have any questions about Toyota of Bristol's participation in the Sequoia Campaign, please do not hesitate to contact

me at **[phone number]**. If you would like more information about Toyota's CRC campaigns generally or about the information contained in Attachments 1 through 3, you also may contact Ms. Sandra Waddell, Toyota's Managing Counsel for Environmental, Health and Safety matters at (310) 468-4830.

Sincerely,

[Contact at Toyota of Bristol]

Attachments

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ATTACHMENT 1
TOYOTA CAMPAIGNS TO ADDRESS FRAME CORROSION
FOR CERTAIN VEHICLES OPERATED IN TENNESSEE

INTRODUCTION, OVERVIEW AND AIR EMISSIONS CALCULATIONS

I. BACKGROUND AND SUMMARY OF CAMPAIGNS

Toyota of Bristol has previously participated in two campaigns to address greater than expected levels of frame corrosion in certain Toyota vehicles known as the “Tacoma LSC 90D” and “Tundra B0D.”¹ Both the Tundra B0D and Tacoma LSC 90D involved application of corrosion-resistant compounds (“CRCs”) to the vehicle frame surfaces – one to the interior and one to the exterior of vehicle frame surfaces – with specialized Vaupel HSDR 3300 (“Vaupel”) spray guns.

For both the Tacoma LSC 90D and Tundra B0D, the Tennessee Air Pollution Control Board (“TAPCB”) determined that the campaigns constitute insignificant activities or insignificant emissions units under Tennessee Air Pollution Control Regulations. In support of these determinations, the participating Tennessee dealers submitted potential to emit (“PTE”) calculations for each campaign based on the total number of vehicles eligible for the program (“units in operation” or “UIO”). TAPCB accepted the UIO-based PTE methodology and, on August 4, 2009 and October 1, 2011, issued determinations that the Tacoma LSC 90D and Tundra B0D, respectively, constitute insignificant activities or insignificant emissions units.²

Toyota Motor Sales, Inc. (“TMS”) is now planning a third CRC campaign for model years (“MYs”) 2001 – 2004 Sequoia vehicles (the “Sequoia Campaign”) and³ also may offer CRC campaigns in the future to address greater than expected levels of frame corrosion for other types or other model years of Toyota vehicles (the “Future Campaigns”). Dealers participating in the Sequoia and Future Campaigns will use the same two Vaupel spray guns used to apply the same two CRCs used in the Tundra B0D (712 AM and Noxudol 300 S). The only difference between the Tundra B0D and the Future Campaigns will be that the quantities of each CRC used may vary for each campaign depending upon the area of the vehicle frame that needs to be treated.⁴ In no event, however, does TMS anticipate that any Future Campaign would apply more than 3 liters of Noxudol 300 S and 3 liters of 712 AM.

¹ These campaigns were limited to vehicles registered in 20 states and the District of Columbia. Although Tennessee was not among these states, Toyota of Bristol was selected to participate in order to service vehicles registered in Virginia, which is among the states covered by the campaigns. Toyota of Bristol participated in both campaigns, but Toyota of Kingsport did not participate in the Tundra B0D.

² Toyota of Bristol is now conducting the Tundra B0D for Tundra model years (“MYs”) 2000 – 2003 as part of a voluntary safety recall under the auspices of the National Highway Traffic Safety Administration. However, Toyota of Bristol’s request for determination included Tundra MYs 2004 – 2008 in its UIO-based PTE to account for the possibility that these vehicles may become subject to a CRC campaign in the future.

³ The Sequoia Campaign is presently limited to MYs 2001 – 2004. However, additional model years (MYs 2005 – 2008) may become subject to a CRC campaign in the future.

⁴ The Sequoia Campaign, for example, will use the same amount of Noxudol as the Tundra B0D (3 liters), but it will use 1 liter more of 712 AM (*i.e.*, 2 liters of 712 AM).

TMS now seeks TAPCB's determination that the Sequoia Campaign and any Future Campaign which also uses the Vaupel spray gun to apply 712AM and Noxudol 300 S to the frame surfaces of Toyota vehicles constitute insignificant activities or insignificant emissions units, as defined by Tennessee Air Pollution Control Regulations, §1200-03-09-.04. Because of a significant design change in the CRC program that was implemented with the Tundra B0D – *i.e.*, changing the exterior CRC from X128T (used in the Tacoma LSC 90D) to Noxudol 300 S – TMS significantly lowered the volatile organic compound ("VOC") emissions associated with these programs. Therefore, TMS can demonstrate that emissions associated with the Sequoia Campaign or any Future Campaign will remain below the 5 tpy insignificant activity or insignificant emission unit threshold using a more traditional 24/7/365 PTE methodology instead of the UIO-based PTE methodology previously approved by TAPCB.

In the future, TMS also may offer Toyota of Bristol the option to establish a second spray space to service vehicles under these CRC campaigns if there is a need to process a greater volume of vehicles. If Toyota of Bristol elects to pursue this option, it would be provided with a second set of Vaupel spray guns and could process vehicles simultaneously. As described below, even if aggregated, the emissions from the two spray spaces would still be under the 5 tpy insignificant activity or insignificant emission unit threshold. Therefore, Toyota of Bristol also requests confirmation that its dealers in Tennessee can conduct the Sequoia and Future Campaigns in a second spray space without jeopardizing its status as an insignificant activity or insignificant emissions unit.

In support of Toyota of Bristol's request, this submission provides an operational description of the Sequoia and Future Campaigns and a calculation of VOC and PM emissions associated with a maximum CRC operating scenario. This maximum operating scenario is based on conservative assumptions regarding a maximum amount of CRCs applied to each vehicle and a maximum number of vehicles processed per day and per year.

II. PROCESS OVERVIEW

The Sequoia and Future Campaigns will involve a process substantially similar to the Tundra B0D, which TAPCB previously determined to be an insignificant activity or insignificant emissions unit. For the Sequoia and Future Campaigns, trained technicians at Toyota of Bristol will apply two CRCs – one to the interior surfaces of the vehicle's frame and a second to the exterior surfaces of the vehicle's frame.

A. Materials

For the Sequoia and Future Campaigns, dealers will use the same CRCs now used for the Tundra B0D:

- Interior: 712AM – a paraffin wax-based product containing 0.165 lbs/gal of VOC,⁵ and
- Exterior: Noxudol 300 S – a low-solvent, wax-based product with a VOC content of 0.09 lbs/gal.

⁵ This material previously was manufactured by Parker Industries under license from Daubert Chemical Company, Inc. under the trade name "Nox-Rust 712AM." It now is manufactured by Parker Industries independently under the trade name "712AM."

Neither CRC contains any federal Hazardous Air Pollutants (HAPs), SO_x, NO_x or lead. Both CRCs contain trace amounts of calcium carbonate. Noxudol 300 S also contains trace amounts of carbon black and crystalline silica, but, as explained in the MSDSs, the carbon black and crystalline silica are bound in each sealant and will not be released as respirable particles. The MSDSs for Noxudol 300 S and 712AM are provided as Attachment 3.

B. Equipment

As discussed in prior submissions, the CRCs cannot be applied properly using a conventional high-volume, low-pressure ("HVLP") spray gun. Thus, the Sequoia and Future Campaigns will use the same Vaupel HSDR 3300 spray gun now being used by TMS dealers for the Tundra BOD. Each dealer has been issued two guns – one gun dedicated to application of Noxudol 300 S and the other gun dedicated to application of 712AM.⁶ If a dealer elects to set up a second spray space, the dealers would be provided with a second set of the Vaupel spray guns so that the CRCs can be applied to two vehicles simultaneously.

C. Spray Space

For the Sequoia and Future Campaigns, application of the CRCs will take place within the same dedicated spray spaces presently used for the Tundra BOD. The spray space, located in an existing service bay with a suitable vehicle lift and adequate ventilation, will be sectioned off by plastic tarps that serve as temporary partitions and capture limited overspray and facilitate clean-up. No physical alteration of the workspace or installation of new ventilation or exhaust equipment is contemplated.

D. Waste Management

As with the Tundra BOD, the Vaupel spray guns will not require cleaning. Moreover, the CRCs do not qualify as hazardous waste when discarded.

III. VOC & PM EMISSIONS CALCULATIONS FOR SEQUOIA AND FUTURE CAMPAIGNS

To support Toyota of Bristol's request for a determination that the Sequoia Campaign and any Future Campaign constitutes an insignificant activity or insignificant emissions unit pursuant to Tennessee Air Pollution Control Regulations, §1200-03-09-.04(2)(a)(3), TMS has defined a maximum CRC operating scenario. Under this scenario, a maximum of 3 liters (0.792 gallons) of 712AM and 3 liters (0.792 gallons) of Noxudol 300 S would be applied to the interior and exterior frame surfaces, respectively, of the eligible Toyota vehicles.⁷ It also is assumed that each vehicle would be treated with the interior and exterior CRCs in a single hour – a very conservative estimate given that the 1 hour figure does not account for the prep work required for each vehicle and that actual spray times for application of CRCs to both the Tundra and Sequoia are well in

⁶ Because the Tacoma LSC 90D concluded, as scheduled, on December 31, 2011, Toyota of Bristol no longer will use the higher VOC exterior CRC "X128T," nor will it use the third spray gun that TMS provided for application of X128T.

⁷ To date, no CRC Campaign has required more than 3 liters of any CRC. The Tacoma campaign required 2 liters of 712AM and 3 liters of X128T, Tundra BOD required 1 liter of 712 AM and 3 liters of Noxudol 300 S, and the Sequoia Campaign will require 2 liters of 712 AM and 3 liters of Noxudol 300 S. TMS does not anticipate that any Future Campaign will require more than 3 liters of each CRC.

excess of one and one-half hours.⁸ This scenario also assumes that each dealer would operate the CRC campaign continuously (*i.e.*, 24 hours per day, 365 days per year).

As discussed above, TMS may provide Toyota of Bristol a second set of Vaupel spray guns so that it can perform CRC applications in two bays operating simultaneously. As explained below, aggregate emissions from each service bay in a maximum operating scenario falls well below the 5 tpy threshold for insignificant activities or insignificant emissions units.⁹ For that reason, the addition of a second service bay should have no effect on a determination that a future CRC campaign constitutes an insignificant activity or insignificant emissions unit.

A. VOC Emissions

1. Per Vehicle

Under the maximum CRC operating scenario, Toyota of Bristol would apply a total of 1.58 gallons (6 liters) of anti-corrosion materials to each vehicle – 0.792 gallons (3 liters) of Noxudol 300 S and 0.792 gallons (3 liters) of 712AM. Noxudol 300 S contains 0.09 pounds of VOCs per gallon, while 712AM contains 0.165 pounds of VOCs per gallon. Assuming that all VOCs present in these materials are emitted during their application and/or curing, the VOC emissions would be 0.202 pounds per vehicle (0.792 gallons of Noxudol per vehicle x 0.09 lbs VOCs/gal plus 0.792 gallons of 712AM per vehicle x 0.165 lbs/VOCs per gallon = 0.202 lbs VOCs/vehicle).

2. Per Day

The maximum CRC processing rate, under which one vehicle would be treated per hour over a 24-hour day, would yield no more than 4.85 lbs VOCs per day (0.202 lbs/vehicle x 24 vehicles/day = 4.85 lbs VOCs/day) or, if a second spray space is used, 9.70 lbs VOCs/day.

3. Tons Per Year

Assuming continuous operations at one spray space, seven days per week, 24 hours per day, a dealer could process a maximum of 8,760 vehicles in any one year per spray space. Thus, under the maximum CRC scenario, a dealer would emit no more than 0.88 tons of VOCs in any one year (8,760 vehicles/year x 0.202 lbs/vehicle, divided by 2,000 lbs/ton = 0.88 tons VOCs/year) or, if a second spray space is used, 1.76 tons VOCs/year.

B. PM Emissions

PM emissions from application of 712AM will be minimal due to the inherently high transfer efficiency (*i.e.*, low overspray) when spraying the internal surfaces of the vehicle frame. The

⁸ Actual spray time is 101.60 minutes for Sequoia and 125.3 minutes for Tundra B0D. The actual spray time for the Tacoma LSC 90D was 58.51 minutes. None of these times include time spent preparing the vehicle for spraying.

⁹ We note that each service bay could be considered a separate emission unit and, therefore, aggregating emissions is not necessary in this context. See Tenn. Reg. §1200-03-09.04(2)(a)(1) (defining an "emissions unit" as "any part of activity of a stationary source that emits or has the potential to emit any regulated air pollutant" and "the smallest discrete or identifiable ... device, ... equipment, ... or group of discrete or identifiable ... devices, ... [or] equipment ... that emit or have the potential to emit any regulated air pollutant").

Vaupel spray gun's transfer efficiency when applying 712AM to the interior frame of the Sequoia has been calculated to be at least 98.5%, very close to the transfer efficiency for the Tundra (*i.e.*, 99.35%). In addition, given the similar frame configurations between the vehicle models being treated, TMS expects that the transfer efficiency when applying Noxudol 300 S to the vehicles exterior frame surfaces will be at least 85%, as is the case for the Tundra B0D.

Further, based on tests conducted by Concurrent Technologies Corporation evaluating the application of Noxudol 300 S to the Tundra frame, it can be concluded that at least 90% of any PM emitted from application of Noxudol 300 S will fall out of the air before reaching the ambient outdoor air, thus reducing emissions from application of the exterior CRC by at least 90%. TMS also expects that at least 75% of any PM emitted from application of 712AM will fall out of the air before reaching the ambient outdoor air, thus reducing emissions from application of the exterior CRC by at least 75%.

1. **Per Vehicle**

Based on these transfer efficiencies and fallout assumptions, the maximum CRC operating scenario would produce PM emissions of no more than 0.12 pounds per vehicle ($(0.94^{10} \times 10\%) + (0.09^{11} \times 25\%) = 0.12$ lbs PM/vehicle).

2. **Per Day**

As explained above, under the maximum CRC operating scenario, a dealer will process no more than 24 vehicles per day per spray space. Processing 24 vehicles per day will result in PM emissions of up to 2.80 pounds per day (24 vehicles per day x 0.12 lbs/vehicle = 2.80 lbs PM/day) or, if a second spray space is used, 5.60 pounds per day.

3. **Tons Per Year**

Assuming continuous operations in one spray space, seven days per week, 24 hours per day, a dealer could process a maximum of 8,760 vehicles in any one year per spray space. Thus, under the maximum CRC operating scenario, a dealer would emit no more than 0.51 tons of PM in one year (8,760 vehicles/year x 0.12 lbs/vehicle, divided by 2,000 lbs/ton = 0.51 tons PM/year) or, if two spray spaces are used, 1.02 tons PM/year.

¹⁰ This 0.94 lbs PM is the calculation for Noxudol 300 S of per vehicle emissions before application of the 90% fallout factor (0.792 gals/vehicle x 7.97 lbs/gal [Noxudol 300 S density] x 98.9% solids by weight x (100%-85% transfer efficiency) = 0.94).

¹¹ This 0.09 lbs PM is the calculation for 712AM of per vehicle emissions before application of the 75% fallout factor ((0.792 gals/vehicle x 7.895 lbs/gal [712AM density] x 97.5% solids by weight x (100%-98.5% transfer efficiency) = 0.091).

IV. SUMMARY OF VOC & PM EMISSIONS CALCULATIONS

	Maximum CRC Operating Scenario (One Bay)	Maximum CRC Operating Scenario (Two Bays)
VOCs		
Per Vehicle (lbs)	0.20	0.20
Per Day (lbs)	4.85	9.70
PTE (tons/year)	0.88	1.76
PM		
Per Vehicle (lbs)	0.12	0.12
Per Day (lbs)	2.80	5.60
PTE (tons/year)	0.51	1.02

ATTACHMENT 2: PRIOR INSIGNIFICANT ACTIVITY DETERMINATIONS

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

August 4, 2009

Mr. Melvin Shaffer
Toyota of Bristol
3045 West State St.
Bristol, TN 37620

Re: 82-0435-01
62959

Dear Mr. Shaffer:

This correspondence is in response to your letter dated July 24, 2009. The information which you provided has undergone a preliminary review by the permit program.

It has been determined that the surface coating operation would constitute an insignificant *activity or insignificant emissions unit*, as defined in part 1200-3-9-.04(2)(a)3. of the Tennessee Air Pollution Control Regulations. Specifically, the proposed operation would result in potential emissions from the source of less than five (5) tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.

For new sources, subparagraph 1200-3-9-.04(4)(a) of the Tennessee Air Pollution Control Regulations requires that the request for designation as an insignificant emissions unit be made at least thirty (30) days prior to the estimated starting date of construction. Your letter is accepted as the required notification. All applicable air pollution regulations must still be met by your facility.

If you have any questions concerning this correspondence, please contact Olga Jacobsen at (615) 532-0581.

Sincerely,

A handwritten signature in cursive script that reads "John A. Trimmer".

John A. Trimmer
Chief, East Tennessee Permit Program
Division of Air Pollution Control

JAT/ODJ

cc: Johnson City Environmental Field Office
82-0435-01-S2
ODJ

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L. & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

October 11, 2011

Mr. Scott Ferrell
Toyota of Bristol
3045 West State St.
Bristol, TN 37620

Re: 82-0435-02
64919

Dear Mr. Ferrell:

This correspondence is in response to your letter dated August 30, 2011. The information which you provided has undergone a preliminary review by the permit program.

It has been determined that the surface coating operation would constitute an insignificant *activity or insignificant emissions unit*, as defined in part 1200-03-09-.04(2)(a)3. of the Tennessee Air Pollution Control Regulations. Specifically, the proposed operation would result in potential emissions from the source of less than five (5) tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.

For new sources, subparagraph 1200-03-09-.04(4)(a) of the Tennessee Air Pollution Control Regulations requires that the request for designation as an insignificant emissions unit be made at least thirty (30) days prior to the estimated starting date of construction. Your letter is accepted as the required notification. All applicable air pollution regulations must still be met by your facility.

If you have any questions concerning this correspondence, please contact Olga Jacobsen at (615) 532-0581.

Sincerely,

Malcolm H. Butler

John A. Trimmer
Chief, East Tennessee Permit Program
Division of Air Pollution Control

JAT/ODJ

cc: Johnson City Environmental Field Office
82-0435-02-S2
ODJ

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**ATTACHMENT 3: MSDSs For Sequoia C0D and
Future CRC Campaigns**

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MATERIAL SAFETY DATA SHEET

PARKER INDUSTRIES

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

EMERGENCY CONTACT:
CHEMTREC (800) 424-9300

HMIS HAZARD RATING

HEALTH	1
FIRE	1
REACTIVITY	0
PERSONAL PROTECTION	B

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

Revised: March 17, 2011
By: Y.Yamada

SECTION 1: PRODUCT IDENTIFICATION

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

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

SECTION 2: HAZARDOUS INGREDIENTS

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

Soybean oil polymer with isophthalic acid and pentaerythritol CAS# 66071-86-1	0.4-4	Not established
Castor oil, dehydrated, polymerized CAS# 68038-02-8	5-15	Not established
Calcium Carbonate CAS #471-34-1	5-10	OSHA PEL: 5 mg/m ³ (respirable fraction) OSHA PEL: 15 mg/m ³ (total dust) ACGIH TLV: 10 mg/m ³ (¹² nuisance dust)

¹² This component poses a hazard only if a dust is formed, i.e., by sawing, sanding, drilling, etc.

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

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

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

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

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

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

SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

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

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

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

SECTION 7: SAFE HANDLING INFORMATION

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

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

SECTION 8: EXPOSURE CONTROLS

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

Ventilation: General and local exhaust.

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

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

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

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

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

SECTION 11: DISPOSAL CONSIDERATIONS

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

SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)

VOC per gallon:

0.165 lbs/gal

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

D001

EPA Hazard Category (40CFR Part 370):

DELAYED (CHRONIC)

SARA TITLE III

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

CHEMICAL	CAS NO.	WT %
----------	---------	------

NONE

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

CHEMICAL	CAS NO.	WT %	RQ/TPQ Lbs
----------	---------	------	------------

NONE

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

CHEMICAL	CAS NO.	WT %	Final RQ Lbs
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NONE

CALIFORNIA PROPOSITION 65

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

CHEMICAL	CAS NO.	Estimated Concentration %
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NONE

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



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

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

Synonyms: None
Chemical Name: Anti Rust Compound

Manufacturer: Auson AB
Verkstadsgratan 3
S-434 42 Kungsbäcka
Sweden

US Distributor: Soken Trade Corporation
12055 Sherman Way
North Hollywood, CA
USA

www.auson.se
PHONE: +46 300-562000
FAX: +46 300-562001

www.noxudolusa.com
(800) 598-3535
(818) 308-8427

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

PREPARED BY: MSDS Authoring Services
VERSION: 1

ISSUE DATE: March 1, 2011
SUPERSEDES DATE: None

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

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

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

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

3. HAZARDS IDENTIFICATION**EMERGENCY OVERVIEW:
CAUTION! COMBUSTIBLE LIQUID.**

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

CARCINOGENICITY:

OSHA: Not listed

ACGIH: Not listed

NTP: Not listed

IARC: Not listed

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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



5. FIRE AND EXPLOSION HAZARD DATA

FLAMMABLE PROPERTIES: Not flammable. Combustible.

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

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

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

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

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

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE



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

SHELF LIFE: See label on packaging.

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

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

CAS NO.	CHEMICAL NAME
64741-88-4	Solvent-refined heavy paraffinic distillate mg/m3
OSHA PEL-TWA:	5
OSHA PEL STEL:	none
OSHA PEL CEILING:	none
ACGIH TLV-TWA:	5
ACGIH TLV STEL:	none
ACGIH TLV CEILING:	none

68783-96-0	PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION MG/M3
OSHA PEL-TWA:	NONE
OSHA PEL STEL:	NONE
OSHA PEL CEILING:	NONE
ACGIH TLV-TWA:	NONE
ACGIH TLV STEL:	NONE
ACGIH TLV CEILING:	NONE

68410-37-7	FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL MG/M3
OSHA PEL-TWA:	NONE
OSHA PEL STEL:	NONE
OSHA PEL CEILING:	NONE
ACGIH TLV-TWA:	NONE
ACGIH TLV STEL:	NONE
ACGIH TLV CEILING:	NONE

8002-74-2	PARAFFIN AND HYDROCARBON WAXES MG/M3
OSHA PEL-TWA:	NONE
OSHA PEL STEL:	NONE
OSHA PEL CEILING:	NONE
ACGIH TLV-TWA:	2 (FUME)
ACGIH TLV STEL:	NONE
ACGIH TLV CEILING:	NONE

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



the state of California under the safe drinking water and toxic reinforcement act of 1986 ("proposition 65") as either a carcinogenic or reproductive hazard:

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

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

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

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

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

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

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

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

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

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

32°F.....0.28

68°F.....1.0

100°F.....2.7

150°F.....11

200°F.....34

250°F.....90

300°F.....160

350°F.....270

400°F.....426

450°F.....600

485°F.....760

10. STABILITY AND REACTIVITY**STABILITY:** Stable under ordinary conditions (70°F (21°C) and 14.7 psig (760 mmHg)), of use and storage.**CONDITIONS TO AVOID:** Combustible atmospheres. Heat, flames, ignition sources, water (absorbs readily) and incompatibles.**POLYMERIZATION:** Not available.**INCOMPATIBILITY WITH OTHER MATERIALS:** Do not store near other combustible materials.**DECOMPOSITION:** Not available.**11. TOXICOLOGICAL INFORMATION****EFFECTS OF EXPOSURE****ACUTE INHALATION:** LC50 not available**EYES:** Irritant**SKIN:** Irritant**ACUTE INGESTION:** LD50 not available



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

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

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

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

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

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

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

15. REGULATORY INFORMATION

U.S. FEDERAL REGULATORY STATUS

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

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

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

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

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

STATE REGULATIONS:

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

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

LOCAL REGULATIONS

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

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

INTERNATIONAL REGULATIONS:

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

16. OTHER INFORMATION

Label Requirements: **WARNING! COMBUSTABLE!**

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

National Fire Protection Association (NFPA):



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

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

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

Prepared By: Donato Polignone (MSDS Authoring Services)

Part Number: --

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Supersedes Date: March 1, 2011

ADDITIONAL INFORMATION:

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

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

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

END OF MSDS

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SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

TENNESSEE DEALER INFORMATION PACKET

APPENDIX C – AIR RECORDKEEPING FORMS

Your dealership should maintain the records included in this Appendix to comply with state regulatory recordkeeping and retention requirements.

This Appendix contains a new “**Tennessee Sequoia and Tundra Daily Production Log**”. **Please begin using this Log to track your hourly and daily vehicle processing for the Tundra B0D and Sequoia C0D as a means of documenting compliance with the hourly PM emissions limit discussed in Step Two of this Packet and in greater detail in the Tundra B0D Packet.** Please retain all completed Logs, along with the other documents listed below:

1. The Notification for Designation of the Sequoia C0D as an “Insignificant Activity” submitted to the Tennessee Air Pollution Control Board (TAPCB), including all attachments. *The Notification form, along with instructions for you to complete and submit it, are included in Appendix B of this Packet.*
2. The Determination of Agreement with the above Notification received from the TABCP.
3. The documents identified in the Tundra B0D Packet, including:
 - a. The California South Coast Air Quality Management District’s (“SCAQMD”) determination that the Vaupel HSDR 3300 Spray Guns for the B0D are equivalent to High Volume Low Pressure Application Equipment, a copy of which was included in the Tundra B0D Packet.
 - b. The Notification for Designation submitted by you and the Determination of Agreement received from TABCP confirming the Tundra B0D as an “Insignificant Activity”.

Important: Please maintain these documents in your dealership’s records for a period of five (5) years after the last day that you spray a Tundra or Sequoia at your dealership.

Instructions for Completing the Tennessee Sequoia and Tundra Daily Production Log

Follow these 4 steps to complete the Tennessee Sequoia and Tundra Daily Production Log.

Maintain the completed logs in your dealership's records for a period of five (5) years after the last day that you apply CRCs to a Sequoia or Tundra vehicle at your dealership.

Step 1:
Enter the "Reporting Year" and your "Dealership Name" at the top of the log.

Step 2:
Enter the date and the number of Sequoias and Tundra vehicles that you processed on that date.

Step 3:
Enter the time that you finished processing each vehicle. To comply with air emissions limits, you should not process more than one vehicle (Sequoia or Tundra) every two hours.

Step 4:
Record the amount of VOC and PM emissions produced on each day. In the Emission Estimator Table below, locate the row that corresponds to the number of Sequoias (down the left side) and the column that corresponds to the number of Tundras (across the top) processed each day. Enter the values in the box where the row and column intersect in the production log

Reporting Year: _____ Dealership Name: _____

Date	SEQUOIA		TUNDRA		Emissions <i>Use the Emissions Estimator to determine the daily total</i>	
	Number of Sequoias	Time of Completion	Number of Tundras	Time of Completion	VOC (lbs)	PM (lbs)
3-1-12	0	--	2	2:30, 5:00	0.22	0.20
3-2-12	1	10:30	2	1:00, 3:15	0.38	0.31
3-3-12	3	12:00, 2:15, 5:30	0	--	0.48	0.33
3-4-12	2	3:00, 5:15	2	10:45, 1:00	0.54	0.42
3-5-12	2	11:15, 5:00	1	2:15	0.43	0.32
3-6-12	0	--	4	10:35, 12:50, 3:15, 5:45	0.44	0.40

EMISSIONS ESTIMATOR

		TUNDRAS					
		0	1	2	3	4	5
SEQUOIAS	0	VOC = 0 PM = 0	VOC = 0.11 PM = 0.10	VOC = 0.22 PM = 0.20	VOC = 0.33 PM = 0.30	VOC = 0.44 PM = 0.40	VOC = 0.55 PM = 0.50
	1	VOC = 0.16 PM = 0.11	VOC = 0.27 PM = 0.21	VOC = 0.38 PM = 0.31	VOC = 0.49 PM = 0.41	VOC = 0.60 PM = 0.51	VOC = 0.71 PM = 0.61
	2	VOC = 0.32 PM = 0.22	VOC = 0.43 PM = 0.32	VOC = 0.54 PM = 0.42	VOC = 0.65 PM = 0.52	VOC = 0.76 PM = 0.62	VOC = 0.87 PM = 0.72
	3	VOC = 0.48 PM = 0.33	VOC = 0.59 PM = 0.43	VOC = 0.70 PM = 0.53	VOC = 0.81 PM = 0.63	VOC = 0.92 PM = 0.73	VOC = 1.03 PM = 0.83
	4	VOC = 0.64 PM = 0.44	VOC = 0.75 PM = 0.54	VOC = 0.86 PM = 0.64	VOC = 0.97 PM = 0.74	VOC = 1.08 PM = 0.84	VOC = 1.19 PM = 0.94
	5	VOC = 0.80 PM = 0.55	VOC = 0.91 PM = 0.65	VOC = 1.02 PM = 0.75	VOC = 1.13 PM = 0.85	VOC = 1.24 PM = 0.95	VOC = 1.35 PM = 1.05



SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D





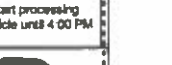

TENNESSEE DEALER INFORMATION PACKET

APPENDIX D – GUIDANCE ON VEHICLE PROCESSING LIMITS

Tennessee regulations impose an hourly limit on particulate matter (PM) emissions from a "process". To assure compliance with these regulations for the CRC application process, your dealership must restrict its vehicle processing to **NO more than one Tundra every 2 hours or one Sequoia every 2 hours.**

1. "Processing" means the application of CRCs with the Vaupel HSDR 3300 spray gun; it does not include vehicle preparation activities.
2. The vehicle processing limits mean that once you begin processing a vehicle, you may not begin processing another vehicle until the 2 hours has passed.
3. Example #1: You begin processing (*i.e.*, applying the CRCs to) a Tundra at 10:00 a.m. in the spray space. In another service bay, you begin preparing a second Tundra for processing. You complete processing the first Tundra at 11:30 a.m., and by that time, you also have completed your preparation of the second Tundra for processing. You may move that second Tundra to the spray space at 11:30 a.m., but you may NOT begin processing it until 12:00 p.m. – *i.e.*, until 2 hours after you began processing the first Tundra at 10 a.m.
4. Example #2: You begin processing a Sequoia at 10:00 a.m. in the spray space. In another service bay, you begin preparing a Tundra for processing. You complete processing the Sequoia at 12:05 a.m., and by that time, you also have completed your preparation of the Tundra for processing. You may move that Tundra to the spray space and begin processing it immediately, given that more than 2 hours has passed since you began processing the Sequoia.

Sample Staff Schedule

	8:00 to 10:00 AM	10:00 AM to 12:00 PM	12:00 to 2:00 PM	2:00 to 4:00 PM	4:00 to 6:00 PM	6:00 to 8:00 PM
Vehicle 1		Cannot start processing another vehicle until 10:00 AM				
Vehicle 2	Cannot start processing another vehicle until 10:00 AM		Cannot start processing another vehicle until 12:00 PM			
Vehicle 3		Cannot start processing another vehicle until 12:00 PM		Cannot start processing another vehicle until 2:00 PM		
Vehicle 4			Cannot start processing another vehicle until 2:00 PM		Cannot start processing another vehicle until 4:00 PM	
Vehicle 5				Cannot start processing another vehicle until 4:00 PM		Cannot start processing another vehicle until 6:00 PM
Vehicle 6					Cannot start processing another vehicle until 6:00 PM	

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



IMPORTANT – PLEASE READ

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