

TOYOTA

TO: MINNESOTA 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

MINNESOTA DEALER INFORMATION PACKET

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 will 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 this 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 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 Minnesota Pollution Control Agency.
 - b. Your dealership will continue to keep its potential to emit ("PTE) of 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 25 tpy for PM. Doing so should not pose an issue as long as your dealership:

- i. Does **not** operate a very large on-site or off-site body shop; and
 - ii. Does not otherwise engage in substantial painting, spraying or other activities that use spray guns.
- c. 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 C of this Packet for guidance on how to follow these vehicle processing restrictions.

3. Your dealership will

- (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 B0D Packet.**

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

- a. As noted above, your dealership should 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.
- 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

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.

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 C0D, 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 these CRC campaigns. As long as your dealership will 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) 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 C0D, 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 C0D.

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.** Please use the "Sequoia and Tundra Daily Production Log" in Appendix B of this Packet to document that you are following these vehicle processing restrictions. As noted above, Appendix C of this Packet includes guidance on how to follow these vehicle processing restrictions.

- 2. Comply with air recordkeeping obligations that apply to both the B0D and the Sequoia C0D by using the new forms provided in Appendix B of this Packet. (You no longer need to use the forms provided with the B0D Packet, but you must keep the previously completed forms on file for the time period specified in the B0D Packet.)**
- a. The B0D Packet details the air recordkeeping obligations that apply to CRC Campaigns.
 - b. Your dealership must comply with these same obligations when conducting the Sequoia C0D.²
 - c. Appendix B to this Packet provides forms that you can use track the number of vehicles processed under the Tundra B0D and the Sequoia C0D and resulting air emissions using the "Tundra and Sequoia Daily Production Log."
 - d. Your dealership should keep copies of documents that address the guaranteed transfer efficiency of the Vaupel HSDR 3300 spray gun and that describe the materials and equipment used to conduct the Tundra B0D and the Sequoia C0D. Copies of such documents were provided with the Tundra B0D Packet.

² Please note that while 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://cleandealer.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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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 B0D 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 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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APPENDIX B – AIR RECORDKEEPING FORMS

Your dealership must maintain the records included in this Appendix to comply with state regulatory recordkeeping and retention requirements. *This Appendix contains a new version of the “Minnesota Sequoia and Tundra Daily Production Log” that was included in the Tundra B0D Packet. Please use this updated form for both the B0D and the Sequoia C0D to track the number of Sequoia and Tundra vehicles processed by your dealership and the daily VOC and PM emissions produced by your dealership’s CRC operations.* (You no longer need to use the version of this form included in the B0D Packet, **but you must keep the previously completed forms on file for the time period specified in the B0D Packet.**)

The Tundra B0D Packet contained several documents that your dealership must keep on file along with the completed Production and Usage Logs. You should continue to keep these documents on file for both the Tundra B0D and Sequoia C0D. If you cannot locate these documents, then you can download the B0D Packet that contains these documents from the C.L.E.A.N. Dealer website (<http://cleandealer.com>). You do not need to keep any additional documents on file for the Sequoia C0D.

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.

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Instructions for Completing the Minnesota Sequoia and Tundra Daily Production Log

Follow these 4 steps to complete the **Minnesota 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:
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 to record the amount of VOC and PM emissions produced on that day.

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

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APPENDIX C – GUIDANCE ON VEHICLE PROCESSING LIMITS

Minnesota regulations impose an hourly limit on particulate matter (PM) 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 (*e.g.*, cleaning the frame) 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 (*i.e.*, applying the CRCs to) a Sequoia at 10:00 a.m. in the spray space. In another service bay, you begin preparing (*e.g.*, cleaning the frame) 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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