

TOYOTA

TO: WISCONSIN 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

WISCONSIN 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.

(This page intentionally left blank)

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 Wisconsin Department of Natural Resources ("WDNR").

- b. Your dealership will continue to keep its total actual emissions of Volatile Organic Compounds ("VOCs") and Particulate Matter ("PM") below the levels that would trigger air permitting – *i.e.*, 10 tons per year ("tpy") of VOCs and 10 tpy of PM. These levels apply to all operations across your entire dealership, including the Sequoia COD, the Tundra BOD and all other air emitting activities.
 - i. TMS has contacted WDNR and explained Sequoia COD and its air emissions. WDNR has issued a determination that COD will not require an air permit based upon an understanding that total actual air emissions at each Toyota dealership in Wisconsin are less than 10 tpy of VOCs and 10 tpy of PM. (Appendix A contains a copy of this determination.)
 - ii. Keeping total actual emissions below these levels should not pose an issue as long as your dealership:
 - (1) Does not operate a very large on-site or off-site body shop; and
 - (2) 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 B of this Packet for guidance on how to follow these vehicle processing restrictions.

- 3 . **Your dealership will continue to comply with all applicable fire, building, and zoning code requirements as set forth in the BOD Packet.** These requirements are summarized below. You should refer to the BOD 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 BOD.
 - b. 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.
- c. 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.
- d. The Tundra B0D Packet contained a model letter for you to provide notice to your local fire code enforcement official, in writing, that your dealership plans to apply CRC materials to Tundra as well as possibly to other vehicle models. As long as you provided this notice prior to starting the B0D, then you will not be required to provide any additional notice for the Sequoia COD.
- 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.

¹ If you are facing this situation, or if 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 Three Before You Begin The Sequoia C0D, Complete The Readiness Checklist Process

1. For the 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 simpler 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 A of this Packet to document that you are following these vehicle processing restrictions. As noted above, Appendix B 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 A 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 A to this Packet provides forms that you can use to meet these obligations as follows:
 - i. Track the number of vehicles processed under the Tundra B0D and the Sequoia C0D and resulting air emissions using the "Sequoia and Tundra Daily Production Log".

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.

- ii. Record the total volume of VOC-containing materials used by your dealership on a yearly basis and your dealership's actual annual VOC emissions using the "VOC-Containing Materials Usage 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 BOD and the Sequoia COD. Copies of such documents were provided with the Tundra BOD Packet.
 - e. Your dealership should also keep a copy of the letter from the Wisconsin Department of Natural Resources, dated April 19, 2012, confirming that the Sequoia COD is exempt from air permitting requirements in Wisconsin. A copy of this letter is included in Appendix A.
- 3 . **Comply with the annual emissions inventory report requirement, if applicable to your dealership.** Wisconsin imposes an annual emissions inventory report requirement, separate from its air permitting requirements, on sources that emit more than 6,000 pounds per year of VOCs. This 6,000 pounds level applies to all operations across your entire dealership, including the Sequoia COD, the Tundra BOD and all other air emitting activities.
- a. Based on typical dealership operations, TMS does not anticipate that the Sequoia COD, when added to other air emitting activities at your dealership, will cause your dealership to exceed the 6,000 pounds per year emission level.
 - b. However, you should evaluate whether your dealership's actual emissions of VOCs, including the Sequoia COD, do or might exceed 6,000 pounds per year by using the "VOC-Containing Materials Usage Log" in Appendix A.
 - c. You may call the EH&S Hotline (877-572-4347) for assistance with calculations specific to your dealership and to evaluate whether your dealership must comply with this reporting requirement.

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.



Mixed Sources
www.fsc.org Cert no. SPP-COC-022980
FSC® 1996 Forest Stewardship Council



SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

WISCONSIN DEALER INFORMATION PACKET

APPENDIX A – AIR RECORDKEEPING FORMS

Your dealership must maintain the records included in this Appendix to comply with state air regulatory recordkeeping and retention requirements. *This Appendix contains the following new documents:*

1. "Wisconsin Sequoia and Tundra Daily Production Log" A new "Vermont Sequoia and Tundra Daily Production Log" that you can use for both the Tundra B0D and the Sequoia C0D to track the number of vehicles processed by your dealership each day and the resulting air emissions. (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.**)
2. "Wisconsin VOC-Containing Materials Usage Log" Use this form to track your dealership's usage of VOC-containing materials and to calculate your dealership's total annual VOC emissions. You can use this form to demonstrate that your dealership does not produce more than 6,000 pounds of VOC emissions per year, and therefore does not trigger Wisconsin's annual emissions inventory report requirement. Note that this form calculates your dealership's estimated actual VOC emissions from the use of non-CRC materials based on a conservative assumption that the VOC content of those materials will not exceed an average of 7 pounds per gallon.
3. Letter issued by WDNR This letter, dated April 19, 2012, confirms that the Sequoia C0D is exempt from air permitting requirements in Wisconsin.

In addition to the above documents, the Tundra B0D Packet contained several documents that your dealership should continue to keep 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>).

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.

(This page intentionally left blank)

Instructions for Completing the Sequoia and Tundra Daily Production Log

Follow these four (4) steps to complete the **Wisconsin 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 that you apply CRCs to a Sequoia or Tundra vehicle at your dealership.

<p>Step 1: Enter the "Reporting Month and Year" and your "Dealership Name" at the top of the log.</p>	<p>Step 2: Enter the date and the number of Sequoia and Tundra vehicles that you processed on that date.</p>	<p>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.</p>	<p>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. At the end of each month, sum the values in each column and enter those totals in the final row labeled "Total monthly emissions".</p>
--	---	--	---

Reporting Month and 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	0	--	4	10:35, 12:50, 3:15, 5:45	0.44	0.40
Total monthly emissions:						

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

(This page intentionally left blank)

Wisconsin Sequoia and Tundra Daily Production Log

Reporting Month and Year: _____ Dealership Name: _____

Date	S E Q U O I A		T U N D R A		Emissions	
	Number of Sequoias	Time of Completion	Number of Tundras	Time of Completion	<i>Use the Emissions Estimator to determine the daily total</i>	
					VOC (lbs)	PM (lbs)

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

Wisconsin Sequoia and Tundra Daily Production Log

Date	S E Q U O I A		T U N D R A		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)
Total monthly emissions:						

EMISSIONS ESTIMATOR

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. At the end of each month, sum the values in each column and enter those totals in the final row labeled "Total monthly emissions".

		TUNDRAS					
		0	1	2	3	4	5
S E Q U O I A S	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

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

Instructions for Completing the Wisconsin VOC-Containing Materials Usage Log

Follow these five (5) steps to complete the Wisconsin VOC-Containing Materials Usage Log

Step 1: On a monthly basis, enter the total VOC emissions (in pounds) from all CRC campaigns in Column 1. (You should already be tracking total monthly VOC emissions from CRC campaigns using the "Daily Production Log".)

Step 2: On a monthly basis, enter the total volume (in gallons) of all paints, coatings, solvents or other VOC-containing materials used in Column 2.

Step 3: For each month, multiply Column 2 by Column 3, and enter the result in Column 4. [See note on assumptions below]

Step 4: For each month, add Column 1 to Column 4, and enter the result in Column 5. This total reflects the total monthly VOC emissions from your dealership.

VOC-Containing Materials, Paints, Coatings and Solvents

	<u>Column 1</u> Total monthly VOC emissions (in pounds) from CRC campaigns	<u>Column 2</u> Total volume (in gallons) of all paints, coatings, solvents or other VOC-containing materials used	<u>Column 3</u> VOC content of non-CRC materials (in pounds/gallon) [See note on assumptions below]	<u>Column 4</u> Total monthly VOC emissions (in pounds) from the use of non-CRC materials [Note: Product of Column 2 and Column 3]	<u>Column 5</u> Total monthly VOC emissions (in pounds) [Note: Sum of Column 1 and Column 4]
January	14	10	7.0	70	84
February	14.5	20	7.0	140	154.5
March	13	15	7.0	105	118
April	13.75	25	7.0	175	188.75
May	13.5	10	7.0	70	83.5
June	16.45	30	7.0	210	226.45
July	7.5	25	7.0	175	182.5
August	13.5	20	7.0	140	153.5
September	13.15	20	7.0	140	153.15
October	12.15	15	7.0	105	117.15
November	14	10	7.0	70	84
December	21.6	30	7.0	210	231.6
Total annual VOC emissions:					1777.1

Step 5: At the end of each year, sum all of the entries in Column 5 and enter the total in the box below the column. That total reflects your dealership's total **annual** VOC emissions (in pounds). If that value exceeds 6,000 pounds, your dealership may trigger Wisconsin's annual emissions inventory report requirement and you should contact the EH&S Hotline (877-572-4347).

Note: The estimated actual VOC emissions produced by your dealership's usage of paints, coatings, solvents or other VOC-containing materials are based on a conservative assumption that the VOC content of those materials will not exceed an average of 7 pounds per gallon.

(This page intentionally left blank)

Wisconsin VOC-Containing Materials Usage Log

Reporting Month and Year: _____ Dealership name: _____

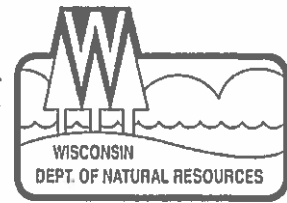
Use this log to track your dealership's usage of VOC-containing materials and to calculate your dealership's total annual VOC emissions. You can use this form to demonstrate that actual annual VOC emissions at your dealership are **BELOW 6,000 POUNDS PER YEAR** and that your dealership is not subject to Wisconsin's annual emissions inventory report requirement.

Important: You must comply with Wisconsin's annual emissions inventory report requirement if your dealership's actual annual VOC emissions are greater than 6,000 pounds per year. If you are facing this situation, please promptly call the EH&S Hotline (877-572-4347) for assistance.

VOC-Containing Materials, Paints, Coatings and Solvents					
	<u>Column 1</u> Total monthly VOC emissions (in pounds) from CRC campaigns	<u>Column 2</u> Total volume (in gallons) of all paints, coatings, solvents or other VOC-containing materials used	<u>Column 3</u> VOC content of non-CRC materials (in pounds/gallon)	<u>Column 4</u> Total monthly VOC emissions (in pounds) from the use of non-CRC materials [Note: Product of Column 2 and Column 3]	<u>Column 5</u> Total monthly VOC emissions (in pounds) [Note: Sum of Column 1 and Column 4]
January			7.0		
February			7.0		
March			7.0		
April			7.0		
May			7.0		
June			7.0		
July			7.0		
August			7.0		
September			7.0		
October			7.0		
November			7.0		
December			7.0		
Total annual VOC emissions:					

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

(This page intentionally left blank)



April 19, 2012

File Code: 4560

Benjamin C. Grawe
Gonzalez Saggio & Harlan LLP
225 East Michigan Street, 4th Floor
Milwaukee WI 53202

Subject: Toyota Sequoia Campaign

Dear Mr. Grawe:

This letter is in response to your April 17, 2012 notification to the Department requesting an exemption for the application of additional corrosion resistant compounds on the Toyota Sequoia 2001-2004 year vehicles and for the Tundra trucks years that have not yet been processed under the previous campaign. The potential emissions are higher for the Sequoia than with the Tundra because of the use of an additional liter of the 712AM interior corrosion-resistant compound (CRC) so the calculations will be based on Sequoia only. The exterior CRC is Noxudol 300 S, and both are applied by a Vaupel HSDR 3300 spray gun (only one issued to each dealer). Specifically the compounds will be applied to the vehicle frame rails, one to the interior frame rail surfaces and one to the exterior frame rail surfaces.

Additionally, future campaigns, substantially similar to this one may be done, using the same or similar coatings.

The two coatings are low VOC and are projected to be emitted at a rate of 0.16 lb per Sequoia and 12 vehicles per day per dealership. Based on 21 dealerships (list in 9-2-09 letter) in Wisconsin performing this work on an maximum estimated 2142 vehicles per dealership, the total VOC emitted is:

$0.16 \text{ lb VOC/vehicle} \times 21 \text{ dealerships} \times 2142 \text{ vehicles} \times 1 \text{ ton}/2000 \text{ lbs} = 3.6 \text{ tons VOC per year}$

Particulate Matter (PM) emissions are as follows:

$0.11 \text{ lb/vehicle} \times 21 \text{ dealerships} \times 2142 \text{ vehicles} \times 1 \text{ ton}/2000 \text{ lbs} = 2.5 \text{ tons PM per year.}$ (This assumes that all PM will be emitted)

The calculations are based on 12 vehicles per day and an operation of 365 days per year. Dealers do not operate more than 12 hours per day. The number of actual units in operation (UIO) has also been increased by a factor of 50% to provide a cushion for the number of vehicles that might actually be serviced by any one dealer. Additionally, there is an assumption that all UIO will respond for the service program, which based on other campaign programs is highly unlikely.

Upon review of Toyota's notification, the Department concludes that the Wisconsin dealerships qualify for the exemption, including all future CRC provided that they are done using the same or similar coatings.

As outlined in the September 2, 2009 letter the dealerships should keep the following records:

- Keep records adequate to show that the facility's annual actual emissions remain below the exemption thresholds. Records should be kept on site for at least 5 years.
- If a control device is used to reduce air pollution emissions, conduct monitoring and keep records of control device parameters as required in s. NR 439.055, Wis. Adm. Code.
- Report emissions annually if required under ch. NR 438, Wis. Adm. Code.
- Operate according to the conditions submitted to the Department (Appendix A)

Although these facilities have been determined to be exempt from the requirement to obtain an air pollution control operation permit, they are still subject to all applicable requirements in NR 400 - 499, Wis. Adm. Code and any other applicable federal, state or local regulations, except as specifically provided herein. Please advise each facility that it is required to be in compliance with all applicable requirements.

As long as each facility maintains its exempt status under s. NR 407.03(1 m), Wis. Adm. Code , it will also be exempt from the requirement to obtain a construction permit for future additions or modifications of equipment at the facility per s . NR 406.04(1)(zh), Wis. Adm. Code.

If you have any questions regarding this letter, feel free to contact me at 608/267-7541 or at my e-mail address: Joseph.Brehm@Wisconsin.gov.

Sincerely,



Joseph G. Brehm, Engineer
Permits & Stationary Source Modeling Section
Bureau of Air Management

 **Mixed Sources**
www.fsc.org Cert no. ST-COC-002980
FSC © 1996 Forest Stewardship Council 







SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

WISCONSIN DEALER INFORMATION PACKET

APPENDIX B – GUIDANCE ON VEHICLE PROCESSING LIMITS

Wisconsin 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 (*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.



(This page intentionally left blank)