

# TOYOTA

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TO: ILLINOIS 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

### ILLINOIS 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. **For dealers in the Chicago and Metro East Areas, this dealer packet includes information (under Step Four and in Appendix A) about how to comply with new state air regulatory requirements that have gone into effect since your dealership started conducting the B0D and that apply to all CRC operations, including the C0D.**
  - a. **The Chicago Area includes Cook, DuPage, Kane, Lake, McHenry and Will Counties, and Aux Sable, Goose Lake, and Oswego Townships.**
  - b. **The Metro East Area includes Madison, Monroe, and St. Clair Counties.**
4. 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 BOD Packet.** These requirements are summarized below. You should refer to the BOD Packet for details.

- a. Your dealership does **not** currently have an air permit issued by the Illinois Environmental Protection Agency ("IEPA").
- b. Your dealership does **not** operate a very large on-site or off-site body shop.
- c. Your dealership will continue to limit its total usage of VOC-containing materials, including thinners, to **l e s s t h a n 5 , 0 0 0 gallons in any rolling twelve (12)-month period.**
- 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 the BOD 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 COD<sup>1</sup> 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 BOD Packet.
- d. The Tundra BOD 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 to your local fire code

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<sup>1</sup> 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.

enforcement official prior to starting the B0D, then you will not be required to provide any additional notice for the Sequoia C0D.

- 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 A of this Packet to document that you are following these vehicle processing restrictions. As noted above, the B0D Packet includes guidance on how to follow these vehicle processing restrictions.
2. **Comply with air recordkeeping obligations that apply to both the Tundra 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 Tundra B0D Packet, but you must keep the previously completed forms on file for the time period specified in the Tundra 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.<sup>2</sup>
  - 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 "Illinois Sequoia and Tundra Daily Production Log".
    - ii. Record the total quantity of all coatings, including thinners, used by your dealership on a monthly basis, including those used for the Tundra B0D and the Sequoia C0D, using the "Illinois Coatings Usage Log".
  - d. Your dealership should keep copies of the documents 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.
4. **Comply with air regulatory housekeeping requirements for CRC storage and handling as follows:**
  - a. Store and convey all CRCs and related waste materials, including cleaning materials and used shop towels, in closed containers;
  - b. Ensure that containers used to store CRCs are kept closed at all times except when depositing or removing those materials;

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<sup>2</sup> 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.

- c. Minimize spills of CRC coatings; and
  - d. Do not clean the Vaupel HSDR 3300 spray guns used to apply the CRC materials with any solvents.
5. **For dealers located in the Chicago and Metro East Areas**, comply with new state air regulatory requirements by maintaining copies of the following documents in your files:
- a. "Certification of Compliance for Corrosion-Resistant Compound Coating Operations Conducted in Chicago and Metro East Areas of Illinois," dated April 30, 2012.
  - b. Letter from IEPA dated May 15, 2012, "Request for Approval, Pursuant to 35 IAC §§ 218.219(b)(6)(H), 219.219(b)(6)(H), to Use Vaupel HSDR 3300 Spray Gun for Coating Operations in Chicago and Metro East Areas."

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 Tundra 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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## SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

### ILLINOIS DEALER INFORMATION PACKET

#### APPENDIX A 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 new versions of two forms that were included in the B0D Packet that you can use for both the Tundra B0D and the Sequoia C0D.*** (You no longer need to use the versions of these forms included in the B0D Packet, **but you must keep the previously completed forms on file for the time period specified in the Tundra B0D Packet.**)

1. **"Illinois Sequoia and Tundra Daily Production Log"** Use this form 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.
2. **"Illinois Coatings Usage Log"** Use this form to record the total volume of CRC coatings and all other coatings, including thinners, used across your entire dealership on a monthly basis. Your dealership must not use more than 5,000 gallons of coatings in any rolling twelve (12)-month period. Maintain this log to help ensure that you will not exceed this limit.

The 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://cleanddealer.com>).

**Dealers in the Chicago and Metro East Area must also comply with requirements that are new since Tundra B0D by maintaining the following documents in your files:**

1. "Certification of Compliance for Corrosion-Resistant Compound Coating Operations Conducted in Chicago and Metro East Areas of Illinois," dated April 30, 2012.
2. Letter from IEPA dated May 15, 2012, "Request for Approval, Pursuant to 35 IAC §§ 218.219(b)(6)(H), 219.219(b)(6)(H), to Use Vaupel HSDR 3300 Spray Gun for Coating Operations in Chicago and Metro East Areas."

Copies of these documents are provided in this Appendix.

**Important:** Please maintain these documents in your dealership's records for a period of three (3) years after the last day that you spray a Tundra or Sequoia at your dealership.

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## Instructions for Completing the Sequoia and Tundra Daily Production Log

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

Keep the completed logs in your dealership's records for a period of 3 years after the last day that 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	Number of Sequoias	SEQUOIA		TUNDRA		Emissions <i>Use the Emissions Estimator to determine the daily total</i>	
		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	0.30
3-4-12	2	3:00, 5:15	2	10:45, 1:00		0.54	0.40
3-5-12	2	11:15, 5:00	1	2:15		0.43	0.30
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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*Duplicate as Necessary*

## Illinois Sequoia and Tundra Daily Production Log

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## 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.

		TUNDRAS					
		0	1	2	3	4	5
SEQUIOIAS	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

*Duplicate as Necessary*

## Instructions for Completing the Coating Usage Log

Follow these 5 steps to complete the Illinois Coating Usage Log.

Keep the completed logs in your dealership's records for a period of 3 years after the last day that that you apply CRCs to a Sequoia or Tundra vehicle at your dealership.

**Step 1:** On a monthly basis, determine the total number of Sequoia vehicles and Tundra vehicles that your dealership treated with CRC coatings.

**Step 2:** On a monthly basis, record the total quantity (in gallons) of 712AM used by your dealership.

To determine the amount of 712AM used per month, multiply the number of Sequoias processed in that month by 0.528 gallons. Multiply the number of Tundras processed in that month by 0.264 gallons. Add the results together.

**Step 3:** On a monthly basis, record the total quantity (in gallons) of Noxudol 300 S used by your dealership.

To determine the amount of Noxudol 300 S used per month, multiply the total number of vehicles (Sequoias and Tundras) processed in that month by 0.793 gallons.

	712AM (gal)	Noxudol 300 S (gal)	Other Coating Materials (gal)	Total (gal)
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				

**Step 4:** On a monthly basis, record the total quantity (in gallons) of all other coatings, including thinners, used by your dealership in that month for operations other than CRC programs.

**Step 5:** Sum the entries in the first three columns to determine the total quantity of coatings used by your dealership per month.

**Important:** Your dealership must not use more than 5,000 gallons of coatings in any rolling 12-month period.

*If your dealership frequently uses more than 416 gallons of coatings per month, or will use more than 5,000 gallons of coatings in any 12-month period, call the EH&S Hotline (877-572-4347).*

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### Illinois Coatings Usage Log

Dealership Name:	Dealership Address:
Reporting Year:	

**Instructions:** Use this log to record the monthly volume of CRCs used to process Sequoia and Tundra vehicles and all other coatings, including thinners, used by your dealership to demonstrate that your dealership does not use more than 5,000 gallons of coatings in any rolling twelve (12) month period.

1. Each month, record the amount of **712AM** and **Noxudol 300 S** used to process Sequoias and Tundra vehicles.
  - To determine the amount of **712AM** used per month, multiply the number of Tundras processed by **0.264** gallons and the number of Sequoias processed by **0.528** gallons, then add the results together.
  - To determine the amount of **Noxudol 300 S** used per month, multiply the number of Sequoias and the number of Tundras processed that month by **0.793** gallons.
2. Record the amount, in gallons, of all coatings, including thinners, used across your entire dealership for coating operations other than CRC programs each month.
3. Add the entries in all three columns together to determine your total use of coatings in that month.

**Maintain this record in your files for 3 years after you process the last Tundra or Sequoia vehicle.**

	712AM <sup>1</sup> (gal)	Noxudol 300 S <sup>2</sup> (gal)	Other Coating Materials (gal)	Total (gal)
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				

<sup>1</sup> 712AM VOM content: 0.165 lbs/gal.

<sup>2</sup> Noxudol 300 S VOM content: 0.089 lbs/gal.

**IMPORTANT:** Your dealership must not use more than 5,000 gallons of coatings, including thinners, in any 12-month period, which is an average of 416 gallons per month. If your dealership might exceed the 5,000 gallon limit in any 12-month period, or if your dealership's monthly use of coatings frequently exceeds 416 gallons, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347).

*Duplicate as necessary*

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