

# TOYOTA

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**TO:** NEW JERSEY DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

**DATE:** 2013

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

## SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

### NEW JERSEY 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 Tundra B0D to apply the same CRC materials that were used for B0D – *i.e.*, 712 AM and Noxudol 300 S. You will apply these CRCs in the same spray space that you were using for B0D and are now, as of January 1, 2013, using for Tundra BXD.<sup>1</sup>

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 protection 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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<sup>1</sup> Your dealership recently received a Supplement to the Tundra B0D Dealer Information Packet, which explains that the limited time offer portion of Tundra B0D ended on December 31, 2012, but the Safety Recall will continue after December 31, 2012, and be referred to as "Tundra BXD". Under Tundra BXD, Noxudol 300 S will be applied only to the rear portion of the frame, and no 712AM will be applied at all.

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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 Sequoia C0D and 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 Sequoia C0D, so that you understand all steps your dealership must take to comply with the applicable legal requirements while conducting Sequoia C0D.
3. You received a copy of the Tundra 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 must conduct Sequoia C0D in the same spray space that is currently being used for Tundra BXD (and previously was used for Tundra B0D) and in accordance with the Technical Instructions for Sequoia C0D.**
  - a. TMS previously obtained approval from the New Jersey Division of Fire Safety (the Division) for your dealership to conduct Tundra B0D (now superseded by BXD) and other CRC campaigns.
  - b. To operate consistent with the approval, you must conduct Sequoia C0D in the same spray space that is currently being used for Tundra BXD (and previously was used for Tundra B0D) and do so in accordance with the Technical Instructions for Sequoia C0D.
  - c. If your dealership is not participating in Tundra BXD or will not conduct Sequoia C0D in the same spray space currently being used for Tundra BXD, you may not be covered by the Division's approval. Please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.
2. **Your dealership may conduct Sequoia C0D under the Air Pollution Control Preconstruction Permit and Certificate to Operate ("Minor Source Permit") issued to you by the New Jersey Department of Environmental Protection (NJDEP) at the time of Tundra B0D as long as you will continue 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 will conduct Sequoia C0D at the specific address and location corresponding to the emissions points designated in your Minor Source Permit. (If you intend to conduct it elsewhere, then you will need a new permit.)
  - b. Your dealership will restrict vehicle processing -- in order to limit emissions of Volatile Organic Compounds ("VOCs") and Particulate Matter ("PM") as required by your Minor Source Permit -- as follows.

- i. **Process no more than one Tundra or one Sequoia every 2.5 hours.**
- ii. **Apply no more than 3 liters of Noxudol 300 S in any two-hour period.**
- iii. **Process no more than 2,920 Tundra and Sequoia vehicles (combined) in any 12-month period.<sup>2</sup>**

Please use the "New Jersey Sequoia C0D and Tundra BXD Daily Processing Log" that was provided in the Tundra BXD Supplemental Packet (another copy of which is included in Appendix A of this Packet) to document that you are following these vehicle processing restrictions.

**Important Note For Gateway Toyota:** Your dealership remains subject to more stringent emissions limits under local Toms River ordinances. Thus, you should continue to comply with the vehicle processing restrictions discussed in the Supplemental Tundra B0D Information Packet for Gateway Toyota and apply no more than 1 liter of Noxudol in any one hour, process no more than one Tundra or one Sequoia every **3 hours** (not 2.5 hours), apply no more than 3 liters of Noxudol 300 S in any **three-hour** (not two-hour) **period**, and process no more than 2,920 Tundra and Sequoia vehicles (combined) over any 12-month period.

- c. Your dealership will provide training to employees who will be conducting Sequoia C0D and document that you have done so.
  - i. **Background:** New Jersey regulations require training of employees involved in conducting CRC campaigns. Your dealership should already have provided training to employees who are conducting Tundra BXD and completed the Personnel Training Log included in the BXD Supplemental Packet.
  - ii. **Action Items**
    - (1) You should train employees who will be conducting Sequoia C0D by reviewing the Tundra B0D Packet, the Sequoia C0D Technical Instructions and this Dealer Information Packet with them now.
    - (2) Document this training on the Sequoia C0D Personnel Training Log included in Appendix A.
    - (3) Keep the C0D Personnel Training Log with the training logs used by your dealership for other CRC campaigns on file until five years after your dealership ceases its involvement in CRC campaigns.

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<sup>2</sup> As noted in the Tundra B0D Packet, your Minor Source Permit included authorization by NJDEP to conduct future CRC campaigns and for a second spray space. At the present time, however, you should continue to conduct the Tundra BXD and Sequoia C0D in only one spray space.

3. **Your dealership will continue to comply with all applicable fire, building and zoning code requirements as set forth in the Tundra B0D Packet, except that you no longer need to (1) take exhaust system measurements or (2) adhere to the other procedures required to complete the CRC Program Exhaust System Temperature Log included in the Tundra B0D Dealer Information Packet.**

**IMPORTANT REMINDER:** Although you no longer are required to follow the procedures contained in the CRC Program Exhaust System Temperature Log, you should continue to follow the procedures in the Technical Instructions for ensuring that the exhaust system has cooled sufficiently prior to applying CRCs.

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

a. **Background**

- i. As noted above, TMS obtained approval for Tundra B0D from the New Jersey Division of Fire Safety (the "Division").
- ii. Under this approval, the Division required you, for B0D (as well as for the prior CRC campaign known as "Tacoma LSC 90D"), to take exhaust system temperature measurements at four locations on each vehicle and prohibited you from starting CRC application until the temperature fell below 85°F; the Division also required you to follow other special procedures, such as recording each vehicle's VIN and the time when spraying was completed on the vehicle.
- iii. The B0D Dealer Information Packet included a CRC Program Exhaust System Temperature Log for your dealership to use in documenting its compliance with these special requirements.
- iv. The Division is in the process of reviewing these procedures and is expected to issue an updated determination in January 2013 that, because the CRC campaigns (including the Tundra BXD and Sequoia C0D) use only "Class IIIB combustible liquids", Toyota dealerships in New Jersey will no longer need to take exhaust system measurements or adhere to the other procedures required to complete the CRC Program Exhaust System Temperature Log. Until the updated determination is issued, the Division has advised TMS that dealers in New Jersey may continue the CRC campaigns beyond December 31, 2012 without following the procedures related to measuring the exhaust system temperature.

b. **Action Items**

- i. Similar to the ongoing Tundra BXD, when conducting the Sequoia C0D, you may discontinue following the specific procedures contained in the CRC Program Exhaust System Temperature Log that were required for the Tundra B0D. However, you should:
  - (1) maintain copies of all previously completed Logs for 5 years after your dealership ceases its involvement in CRC campaigns and

- (2) continue to follow procedures in the Technical Instructions for ensuring that the exhaust system has cooled sufficiently prior to applying CRCs.
- ii. In addition to the approval for CRC campaigns obtained by TMS from the Division, it is possible that your dealership was inspected and issued an additional approval by your local fire code enforcement official. If so, and that approval established special requirements or restrictions, then
  - (1) confirm that the approval is not time-limited in such a way that it will not apply to Sequoia C0D and
  - (2) continue to comply with the special requirements or restrictions in the approval.
- iii. 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 Tundra B0D Packet.
- iv. During application of CRCs, your dealership must:
  - (1) Maintain adequate ventilation in the spray space and surrounding area.
  - (2) Have no open flames, spark-producing equipment, or drying, curing, or fusion apparatuses within 20 feet of the spray space.
  - (3) Have fire extinguishers rated "B," "AB," or "ABC" within 30 feet of the spray space.
  - (4) Meet the additional operational requirements identified in the Site Selection Guide, which you can download from the C.L.E.A.N. Dealer website (<http://cleandealer.com>).
  - (5) Follow the best management practices for handling and storage of the CRC materials outlined in the B0D Packet.

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 Sequoia C0D in the spray space that is now being used to conduct Tundra BXD (and previously was used for 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 or Sequoia every 2.5 hours (or, for Gateway Toyota, every 3 hours).**
  - a. Please use the "Sequoia C0D and Tundra BXD Daily Production Log" that was provided in the Tundra BXD Supplemental Packet (another copy of which is included in Appendix A of this Packet) to document that you are following these vehicle processing restrictions.
  - b. Please refer to the Air Regulations Section of the B0D Packet for guidance on how to follow these vehicle processing restrictions.
2. **Comply with air recordkeeping obligations and keep copies of all completed forms and other documents on file for five (5) years after your dealership ceases its involvement in CRC campaigns.**
  - a. The Tundra B0D Packet details the air recordkeeping obligations that apply to CRC Campaigns.
  - b. Your dealership can comply with these same obligations when conducting the Sequoia C0D<sup>3</sup> as follows:
    - i. Track vehicle processing and the resulting air emissions with the "New Jersey Sequoia C0D and Tundra BXD Daily Production Log" provided in the Tundra BXD Supplemental Packet (another copy of which is included in Appendix A of this Packet). **(Note: You no longer need to complete the "Monthly Service Log" and the "B0D and LSC Materials Purchase Log" provided in the Tundra B0D Packet.)**

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<sup>3</sup> Please note that while your dealership must comply with hazardous waste requirements generally, the materials associated with the Tundra BXD and the Sequoia C0D do not constitute "hazardous waste" when discarded. As such, neither the Tundra BXD nor the Sequoia C0D will generate hazardous waste or impact your dealership's hazardous waste generator status.

- ii. Document training of the employees involved in Sequoia C0D with the "New Jersey Sequoia C0D – Personnel Training Log" included in Appendix A of this Packet.
- iii. Keep on file the Minor Source Permit issued to your dealership, along with the following other documents provided in the Tundra B0D Packet:
  - (1) Letter from NJDEP, dated August 31, 2011, approving use of the Vaupel HSDR 3300 as an alternative coating application equipment under N.J.A.C. 7:27-16.12(f)(10);
  - (2) Letter from U.S. EPA Region 2, dated August 17, 2011, approving use of the Vaupel HSDR 3300 spray gun as an alternative coating application equipment under N.J.A.C. 7:27-16.12(f)(10);
  - (3) Vaupel HSDR 3300 spray gun Equipment Manufacturer's Specifications; and
  - (4) Material Safety Data Sheets (MSDSs) for the CRCs.  
(NOTE: These should also be maintained with your other MSDSs, in compliance with OSHA requirements.)

The steps outlined above, in conjunction with the more detailed explanation provided in the Tundra B0D Packet, should help to assure that your dealership conducts both the Tundra BXD and the Sequoia C0D in compliance with the relevant federal, state, and local requirements. This Sequoia C0D 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 BXD or Sequoia C0D. 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 Tundra B0D Packet, or the Sequoia C0D 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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# Instructions for Completing Sequoia C0D and Tundra BXD Daily Production Log

(For use beginning January 1, 2013)

Follow these four steps to complete the New Jersey Sequoia C0D and Tundra BXD Daily Production Log.

Maintain the completed logs in your dealership's records for a period of five years after your dealership ceases its involvement in CRC campaigns.

**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 (C0D)      |                    | TUNDRA (BXD)      |                          | Emissions  |          |
|--------|--------------------|--------------------|-------------------|--------------------------|--|----------|
|        | Number of Sequoias | Time of Completion | Number of Tundras | Time of Completion       | Use the Emissions Estimator to determine the daily total |          |
|        |                    |                    |                   |                          | VOC (lbs)  | PM (lbs) |
| 3-1-12 | 0                  | --                 | 2                 | 2:30, 5:00               | 0.10   | 0.12     |
| 3-2-12 | 1                  | 10:30              | 2                 | 1:00, 3:15               | 0.26   | 0.23     |
| 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              | 0.42   | 0.34     |
| 3-5-12 | 2                  | 11:15, 5:00        | 1                 | 2:15                     | 0.37   | 0.28     |
| 3-6-12 | 0                  | --                 | 4                 | 10:35, 12:50, 3:15, 5:45 | 0.20   | 0.24     |

### EMISSIONS ESTIMATOR

|          |   | TUNDRAS                 |                         |                         |                         |                         |                         |
|----------|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
|          |   | 0                       | 1                       | 2                       | 3                       | 4                       | 5                       |
| SEQUOIAS | 0 | VOC = 0<br>PM = 0       | VOC = 0.05<br>PM = 0.06 | VOC = 0.10<br>PM = 0.12 | VOC = 0.15<br>PM = 0.18 | VOC = 0.20<br>PM = 0.24 | VOC = 0.25<br>PM = 0.30 |
|          | 1 | VOC = 0.16<br>PM = 0.11 | VOC = 0.21<br>PM = 0.17 | VOC = 0.26<br>PM = 0.23 | VOC = 0.31<br>PM = 0.29 | VOC = 0.36<br>PM = 0.35 | VOC = 0.41<br>PM = 0.41 |
|          | 2 | VOC = 0.32<br>PM = 0.22 | VOC = 0.37<br>PM = 0.28 | VOC = 0.42<br>PM = 0.34 | VOC = 0.47<br>PM = 0.40 | VOC = 0.52<br>PM = 0.46 | VOC = 0.57<br>PM = 0.52 |
|          | 3 | VOC = 0.48<br>PM = 0.33 | VOC = 0.53<br>PM = 0.39 | VOC = 0.58<br>PM = 0.45 | VOC = 0.63<br>PM = 0.51 | VOC = 0.68<br>PM = 0.57 | VOC = 0.73<br>PM = 0.63 |
|          | 4 | VOC = 0.64<br>PM = 0.44 | VOC = 0.69<br>PM = 0.50 | VOC = 0.74<br>PM = 0.56 | VOC = 0.79<br>PM = 0.62 | VOC = 0.84<br>PM = 0.68 | VOC = 0.89<br>PM = 0.74 |
|          | 5 | VOC = 0.80<br>PM = 0.55 | VOC = 0.85<br>PM = 0.61 | VOC = 0.90<br>PM = 0.67 | VOC = 0.95<br>PM = 0.73 | VOC = 1.00<br>PM = 0.79 | VOC = 1.05<br>PM = 0.85 |

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**New Jersey Sequoia C0D and Tundra BXD Daily Production Log  
(For use beginning January 1, 2013)**

Reporting Year: \_\_\_\_\_

Dealership Name: \_\_\_\_\_

*Each Tundra BXD vehicle requires 2 liters of Noxudol 300 S (0.089 lbs/gal of VOC). Each Sequoia C0D vehicle requires 2 liters of 712AM (0.165 lbs/gal of VOC) and 3 liters of Noxudol 300 S (0.089 lbs/gal of VOC).*

| Date | SEQUOIA (C0D)      |                    | TUNDRA (BXD)      |                    | Emissions  |          |
|------|--------------------|--------------------|-------------------|--------------------|--|----------|
|      | Number of Sequoias | Time of Completion | Number of Tundras | Time of Completion | Use the Emissions Estimator to determine the daily total |          |
|      |                    |                    |                   |                    | VOC (lbs)  | PM (lbs) |
|      |                    |                    |                   |                    |  |          |
|      |                    |                    |                   |                    |  |          |
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*This record must be maintained for 5 years after your dealership ceases its involvement in CRC campaigns.  
Duplicate as Necessary.*

**New Jersey Sequoia C0D and Tundra BXD Daily Production Log**  
**(For use beginning January 1, 2013)**

| Date | SEQUOIA (C0D)      |                    | TUNDRA (BXD)      |                    | Emissions  |          |
|------|--------------------|--------------------|-------------------|--------------------|--|----------|
|      | Number of Sequoias | Time of Completion | Number of Tundras | Time of Completion | Use the Emissions Estimator to determine the daily total |          |
|      |                    |                    |                   |                    | VOC (lbs)  | PM (lbs) |
|      |                    |                    |                   |                    |  |          |
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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                       |
| SEQUOIAS | 0 | VOC = 0<br>PM = 0       | VOC = 0.05<br>PM = 0.06 | VOC = 0.10<br>PM = 0.12 | VOC = 0.15<br>PM = 0.18 | VOC = 0.20<br>PM = 0.24 | VOC = 0.25<br>PM = 0.30 |
|          | 1 | VOC = 0.16<br>PM = 0.11 | VOC = 0.21<br>PM = 0.17 | VOC = 0.26<br>PM = 0.23 | VOC = 0.31<br>PM = 0.29 | VOC = 0.36<br>PM = 0.35 | VOC = 0.41<br>PM = 0.41 |
|          | 2 | VOC = 0.32<br>PM = 0.22 | VOC = 0.37<br>PM = 0.28 | VOC = 0.42<br>PM = 0.34 | VOC = 0.47<br>PM = 0.40 | VOC = 0.52<br>PM = 0.46 | VOC = 0.57<br>PM = 0.52 |
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|          | 4 | VOC = 0.64<br>PM = 0.44 | VOC = 0.69<br>PM = 0.50 | VOC = 0.74<br>PM = 0.56 | VOC = 0.79<br>PM = 0.62 | VOC = 0.84<br>PM = 0.68 | VOC = 0.89<br>PM = 0.74 |
|          | 5 | VOC = 0.80<br>PM = 0.55 | VOC = 0.85<br>PM = 0.61 | VOC = 0.90<br>PM = 0.67 | VOC = 0.95<br>PM = 0.73 | VOC = 1.00<br>PM = 0.79 | VOC = 1.05<br>PM = 0.85 |

*This record must be maintained for 5 years after your dealership ceases its involvement in CRC campaigns.  
Duplicate as Necessary.*



Sequoia C0D -- Personnel Training Log

Reporting Year: \_\_\_\_\_ Dealership name and location: \_\_\_\_\_

**Instructions:** Dealerships should use this log to confirm that the employees conducting the C0D have been trained as required by N.J.A.C. § 7:27-16.12. Maintain this log in your records for five years after your dealership ceases its involvement in CRC campaigns.

Pursuant to N.J.A.C. § 7:27-16.12, the undersigned have reviewed all materials relevant to the Sequoia C0D Corrosion-Resistant Compound Campaign, including the New Jersey Tundra B0D Dealer Information Packet, the New Jersey Sequoia C0D Dealer Information Packet, and the Sequoia C0D Technical Instructions, and understand the proper use, handling and operation of the C0D materials and equipment.

Employee Names/Date Trained

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Signature of Dealer Principal:

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Date:

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Address & Contact Information for Dealer Principal:

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THIS RECORD MUST BE MAINTAINED FOR 5 YEARS AFTER YOU DEALERSHIP CEASES ITS INVOLVEMENT IN CRC CAMPAIGNS.  
DUPLICATE AS NECESSARY

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