

TOYOTA

TO: DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS
DATE: 2013
RE: Information Packet for Corrosion-Resistant Compound ("CRC") Campaigns

TOYOTA CORROSION-RESISTANT COMPOUND CAMPAIGNS

OHIO DEALER INFORMATION PACKET

Toyota has been offering Corrosion-Resistant Compound ("CRC") campaigns for different model year ("MY") Toyota vehicles registered in certain cold climate states with high road salt use. Toyota Motor Sales, U.S.A., Inc. ("TMS") has developed this Dealer Information Packet to apply across all current and any potential future CRC campaigns.

IMPORTANT

For Tacoma LSC 90D, Tundra B0D, Sequoia C0D and Tundra BXD -- which are collectively referred to in this Packet as "the previous CRC campaigns" -- TMS provided your dealership with a separate packet for each campaign.

This Packet supersedes those separate packets and should be used for:

- Any of the previous CRC campaigns that are still ongoing and***
- Any potential future CRC campaign.***

You will still receive separate Technical Instructions for any potential future CRC campaign before launch.

For the CRC campaigns, you are applying two CRCs --

- 712 AM (interior frame surfaces)
- Noxudol 300 S (exterior frame surfaces)

-- using the two Vaupel HSDR 3300 spray guns issued to your dealership for the previous CRC campaigns.

Applying the CRC materials and using the Vaupel HSDR 3300 spray gun raises legal compliance obligations pertaining to *air emissions, fire safety approval and recordkeeping*. This Packet explains these obligations and recommends steps to assure your dealership's continued compliance with them.¹ This Packet consists of two parts:

- **Part One – General Guide for Compliance:** Part One identifies the general compliance steps all dealerships should take irrespective of location.
- **Part Two: State Compliance Supplement:** This Supplement identifies additional compliance steps for your dealership's particular state and also includes recordkeeping forms and documents.

Please review this CRC Campaigns Dealer Information Packet carefully. If, after reviewing this Packet, you have any questions or concerns, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347).

ASSISTANCE BY KPA: Due to the complexity of the CRC campaigns, TMS engaged KPA to provide additional assistance directly to dealerships conducting CRC campaigns. We plan to continue this engagement for KPA's assistance as your dealership makes the transition to using this updated CRC Campaigns Dealer Information Packet. After a reasonable transition period, KPA's assistance will be available to your dealership only on an as needed basis as approved by your regional representative; additional information will be provided to you at that time.

¹ This Packet is not intended to cover other air, waste management, hazardous material, water, or other environmental laws and regulations that might apply to non-CRC campaign operations at your dealership. We assume that you already comply with other environmental, health and safety requirements.

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TOYOTA CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET

PART ONE – GENERAL GUIDE FOR COMPLIANCE

Applying the CRC materials with a Vaupel HSDR 3300 spray gun produces Volatile Organic Compounds (“VOCs”) and Particulate Matter (“PM”) air emissions subject to federal and state regulations. Generally, these regulations allow emissions up to a certain level and require an air permit to exceed that level. The CRC campaigns do not require a federal air permit. However, air emissions regulations differ in each state; as a result, the CRC campaigns require an air permit in some states. A few local jurisdictions also require an air permit for the CRC campaigns.

Additionally, the CRC materials are Class III combustible liquids subject to state and/or local fire codes. These codes require approval to conduct the CRC campaigns from each dealership’s state and/or local fire code enforcement official.

For the previous CRC campaigns, TMS worked with participating dealerships to obtain:

- An air permit and/or any other approvals, if necessary, to assure compliance with the air emissions regulations; and
- Approval from the appropriate fire code enforcement official.

If your dealership conducted the previous CRC campaigns, then you should be able to conduct any potential future CRC campaign as long as you continue to comply with the legal requirements explained in this Packet.

IMPORTANT:

If your dealership did not conduct the previous CRC campaigns or now plans to change its location for conducting CRC campaigns, then:

- This Compliance Guide is not applicable; and
- Your dealership may not conduct any CRC campaigns until you contact the EH&S Hotline (877-572-4347) to discuss your particular situation and obtain the necessary air regulatory and fire code approvals.

If your dealership has been conducting previous CRC campaigns, but has decided to discontinue its participation, you must contact your regional representative before doing so and also inform Headquarters.

Step One

Before You Begin Any CRC Campaign, Confirm That Your Dealership Will Satisfy All Criteria Below.

1. **CONDUCT IN SAME SPRAY SPACE AS THE PREVIOUS CRC CAMPAIGNS.**
 - a. The spray space used for the previous CRC campaigns already should have been approved by your state and/or local fire code enforcement official.
 - b. You must conduct any CRC Campaign in this same approved spray space.
 - c. If your dealership is not able to do so, then you will need a new approval **before** you begin the new CRC campaign.
2. **FOLLOW TECHNICAL INSTRUCTIONS.**
 - a. Each CRC campaign has its own Technical Instructions.
 - b. You must review the Technical Instructions for the CRC campaign with all employees involved in the campaign.
3. **COMPLY WITH AIR PERMITTING REQUIREMENTS.**
 - a. Your dealership currently should:
 - i. Not hold an air permit for operations other than the CRC campaigns (if so, then that permit might need to be amended before conducting the CRC campaigns.);
 - ii. Not operate a very large onsite or offsite body shop and/or otherwise engage in significant painting, coating or other spraying operations (if so, then your dealership might trigger air permitting due to its non-CRC campaign activities.); **and**
 - iii. For the CRC campaigns either:
 - (1) Hold the necessary state and/or local air permit, where required, or
 - (2) Continue to satisfy air permit exemption requirements.

Refer to Part One, Appendix B and Part Two for details.
4. **COMPLY WITH OTHER AIR EMISSIONS OBLIGATIONS.**
 - a. Continue to **process no more than 1 vehicle every 2 hours, except New Jersey dealerships are subject to a more stringent vehicle processing limit.** Refer to Part One, Appendix A & B and Part Two for details.

- b. Continue to comply with air recordkeeping and other special air regulatory obligations, such as training and housekeeping, where applicable. Refer to Part Two for details.

Note on Recordkeeping Forms: Use the recordkeeping forms provided in Part Two for all CRC campaigns. No longer use the forms provided in the packets for the previous CRC campaigns, but keep previously completed forms on file until 5 years after your dealership ceases its involvement in CRC campaigns.

5. **COMPLY WITH FIRE AND OTHER LOCAL CODES.**

- a. Continue to comply with the approval issued by your state and/or local fire code enforcement official for the previous CRC campaigns. If this approval established any special restrictions,
 - i. Make sure that these restrictions will not prevent you from conducting the CRC campaign, and
 - ii. Continue to comply with them, including any renewal requirements.
- b. Continue to do all of the following when applying CRCs:
 - 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. Make fire extinguishers rated "B," "AB," or "ABC" available within 30 feet of the spray space; and
 - iv. Follow best management practices for handling and storage of the CRC materials including:
 - (1) Do not store more than 25 gallons of the CRC materials and any other regulated flammable or combustible materials in any one fire area; or
 - (2) If you store more than 25 gallons of regulated flammable or combustible liquid in any one fire area, then you must use a fire cabinet.
 - (a) A single fire cabinet may hold up to 120 gallons. Your dealership may only have up to three such fire cabinets in each fire area.
 - (b) If you store regulated flammable or combustible liquids at these levels (3 x 120 gals. = 360 gals.), you should confirm with your appropriate fire code

enforcement official that such storage does not require an operational permit in your locality.

- c. Continue to comply with any additional requirements imposed under fire, building, environmental, safety or zoning codes for your particular locality. Refer to Part Two for details.

Step Two **Begin Conducting The CRC Campaign In Compliance With The Vehicle Processing Limit And The Other Requirements Discussed Above and in Part Two.**

Note on CRC Campaign Wastes: When conducted in accordance with the Technical Instructions, the CRC campaigns do not generate hazardous wastes. In conducting any CRC campaign, your dealership should adhere to its own best practices for general, non-hazardous waste handling.

Thank you for participating in the CRC campaigns.

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



CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET

PART ONE – GENERAL GUIDE FOR COMPLIANCE
APPENDIX A VEHICLE PROCESSING GUIDANCE

VEHICLE PROCESSING LIMIT FOR CRC CAMPAIGNS: No more than 1 vehicle every 2 hours.

New Jersey Exception: New Jersey dealerships are subject to a more stringent vehicle processing limit. (Refer to New Jersey Part Two for details.)

For certain CRC campaigns, your dealership may be able to process a vehicle more quickly, but nevertheless, to assure compliance, you should adhere to this processing limit for all CRC campaigns and all vehicles.







- “Processing” means applying the CRCs to the vehicle with the Vaupel HSDR 3300 spray gun; it does not include vehicle preparation activities.
- The vehicle processing limit means that once you begin processing a vehicle, you may not begin processing another vehicle until the 2 hours have passed.

Example #1

- You begin applying the CRCs to Vehicle A at 10:00 a.m. in the spray space.
- In another service bay, you begin preparing Vehicle B for processing.
- You complete processing the Vehicle A at 11:30 a.m., and by that time, you also have completed your preparation of Vehicle B for processing.
- You may move Vehicle B to the spray space at 11:30 a.m., but you may NOT begin processing it until 2 hours after you began processing Vehicle A at 10 a.m., or in other words, not until 12:00 p.m.

Example #2:

- You begin applying the CRCs to Vehicle A at 10:00 a.m. in the spray space.
- In another service bay, you begin preparing Vehicle B for processing.
- You complete processing Vehicle A at 12:05 p.m., and by that time, you also have completed your preparation of Vehicle B for processing.
- You may move Vehicle B to the spray space and begin processing it immediately, given that more than 2 hours has passed since you began processing Vehicle A.

| Sample Stall 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.



Tundra Minimum Process Time is 2 Hours



Sequoia Minimum Process Time is 2 Hours



CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET

PART ONE – GENERAL GUIDE FOR COMPLIANCE
APPENDIX B -- COMPLIANCE WITH
STATE AND LOCAL AIR PERMITTING REQUIREMENTS

The table below summarizes the steps necessary for Toyota dealerships conducting CRC campaigns to comply with state and local laws related to air permitting. When using this table, please keep in mind the following:

- The “State Air Permitting” column indicates whether a dealership needs an air permit to conduct CRC campaigns, and if no air permit is required, identifies permit exemption requirements.
- The “Local Air Permitting” column indicates any local jurisdiction within a particular state that requires an air permit or other special approval to conduct the CRC campaigns.

IMPORTANT: Follow all criteria described in Part One of this Dealer Information Packet and any additional steps set forth below for your particular state. See Part Two for further details.

Glossary of Common Abbreviations Used In This Table

CRCs: Corrosion Resistant Compounds
gal/hr: Gallons per hour
gal/day: Gallons per day
gal/yr: Gallons per year
lbs/hr: Pounds per hour
lbs/day: Pounds per day
lbs/mo: Pounds per month
PM: Particulate Matter
PTE: Potential to Emit
tpy: Tons per year
vpd: Vehicles per day
VOCs: Volatile Organic Compounds

| STATE AIR PERMITTING | LOCAL AIR PERMITTING |
|---|-----------------------------|
| CONNECTICUT | |
| Remain exempt by not using more than 2,000 gallons of paints, solvents, coatings, sealants (including the CRCs) and other VOC-containing materials across your entire dealership in any rolling 12-month period. (See Part Two for a materials usage tracking and compliance log.) | No additional requirements. |
| DELAWARE | |
| Comply with the Self-Registration submitted by TMS for your dealership and approved by the Delaware Department of Natural Resources and Environmental Conservation on April 20, 2012 by not processing more than 12 vpd. If your dealership never worked with TMS to submit this Self-Registration, or has moved its location since April 20, 2012, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns. | No additional requirements. |

| ILLINOIS | |
|--|---|
| <p>Remain exempt by keeping coating usage across your entire dealership (including CRC materials) at not more than 5,000 gal/yr. (See Part Two for a materials usage tracking and compliance log.)</p> | <p>Dealerships located in the <u>City of Chicago</u> and in <u>Cook County</u>: Comply with the air permit issued to your dealership by either, depending upon your location, the City of Chicago Department of Environment or the Cook County Department of Environmental Control for the previous CRC campaigns.</p> <ul style="list-style-type: none"> ⇒ This permit authorizes any potential future CRC campaign being conducted at the same dealership location. ⇒ If your dealership never obtained this permit, or has moved its location since obtaining it, please contact your please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns. |
| INDIANA | |
| <p>Remain exempt by keeping total actual emissions across your entire dealership under the "permit by rule" exemption levels of 20 tpy for VOCs and 20 tpy for PM.</p> | <p>Dealerships located in <u>Evansville</u>: Comply with the Certificate of Operation already issued by the Evansville Environmental Protection Agency to your dealership for the previous CRC campaigns.</p> <ul style="list-style-type: none"> ⇒ This Certificate authorizes any potential future CRC campaign being conducted at the same dealership location. ⇒ If your dealership never obtained this Certificate, or has moved its location since obtaining it, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns. |

| KENTUCKY | |
|--|---|
| <p>Remain exempt by keeping PTE across your entire dealership below the state permitting thresholds of 10 tpy for VOCs and 10 tpy for PM.</p> | <p>Dealerships located in Jefferson County: Comply with the air permit already issued by the Louisville Metropolitan Air Pollution Control District to your dealership for the previous CRC campaigns by (i) Processing no more than 12 vehicles per day for any CRC campaign; and (ii) Performing monthly inspections of the exterior to the building in which you conduct the CRC operations to ensure no visible emissions are visible.</p> <p>⇒ This permit authorizes any potential future CRC campaign being conducted at the same dealership location.</p> <p>⇒ If your dealership never obtained this permit, or has moved its location since obtaining it, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns.</p> |
| MAINE | |
| <p>Remain exempt by keeping total actual emissions across your entire dealership under the "total facility general process source" thresholds of 100 lbs/day and 10 lbs/hr for VOCs and PM. You can do so by limiting your operations as follows: On any particular day when you are actively engaged in applying CRCs:</p> <p>⇒ Do not use spray guns in any non-CRC operations to apply VOC-containing materials; and</p> <p>⇒ Do not use more than 12 gal/day or 1 gal/hr of VOC-containing materials (including coatings, paints and solvents) in your non-CRC operations.</p> | <p>No additional requirements.</p> |
| MASSACHUSETTS | |
| <p>Remain exempt by keeping records pursuant to the 310 CMR 7.20(2)(d) "Motor Vehicle Maintenance and Repair" exemption. (See Part Two for the necessary recordkeeping forms and other documents.)</p> | <p>No additional requirements.</p> |

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| MARYLAND | |
| Remain exempt by keeping PTE of all CRC campaigns combined below the " <i>de minimis</i> " permitting thresholds of 1 tpy for VOCs and 1 tpy for PM -- which you can do by adhering to the vehicle processing limit of no more than 1 vehicle every 2 hours. | No additional requirements. |
| MICHIGAN | |
| Remain exempt by keeping total actual emissions of air contaminants from all CRC campaigns combined under the "Limited Emissions Exemption" level of 1,000 lbs/mo -- which you can do by adhering to the vehicle processing limit of no more than 1 vehicle every 2 hours. | No additional requirements. |
| MINNESOTA | |
| Remain exempt by keeping PTE across your entire dealership below the permitting thresholds of 100 tpy for VOCs and 25 tpy for PM. | No additional requirements. |
| NEW HAMPSHIRE | |
| <p>Remain exempt by keeping total actual emissions across your entire dealership below the VOCs permitting threshold of 10 tpy, which you can do by limiting your operations as follows:</p> <p>⇒ If Your Dealership Does NOT Have Onsite Refueling Operations: Limit total usage across your entire dealership of all paints, solvents, coatings (including the CRC materials) and any other VOC-containing materials to below 2,500 gal/yr.</p> <p>⇒ If Your Dealership Has Onsite Refueling Operations: Limit total usage across your entire dealership of (1) all paints, solvents, coatings (including the CRC materials) and any other VOC-containing materials to below 2,200 gal/yr, and (2) gasoline to below 100,000 gal/yr.</p> <p>(See Part Two for a materials usage tracking and compliance log.)</p> | No additional requirements. |

| NEW JERSEY | |
|---|--|
| <p>Comply with the Air Pollution Control Preconstruction Permit and Certificate to Operate issued by the New Jersey Department of Environmental Protection on September 2, 2011 by:</p> <ul style="list-style-type: none"> ⇒ Processing no more than one vehicle every 2.5 hours (instead of every 2.0 hours); ⇒ Applying no more than 3 liters of Noxudol 300 S in any 2-hour period; and ⇒ Processing no more than 2,920 vehicles in any one spray space over any 12-month period. <p>This permit authorizes any potential future CRC campaign being conducted at the same dealership location. If your dealership never obtained this permit, or has moved its location since obtaining it, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns.</p> | <p>Dealerships located in <u>Toms River</u>: Comply with the more stringent local emissions limits for PM by:</p> <ul style="list-style-type: none"> ⇒ Processing no more than one vehicle every 3 hours (instead of every 2.5 hours); and ⇒ Applying no more than 3 liters of Noxudol 300S in any 3-hour (instead of 2-hour) period. |
| NEW YORK | |
| <p>Comply with the Air Facility Registration Certificate issued by the New York State Department of Environmental Conservation to your dealership at the time of the Tacoma LSC 90D by:</p> <ul style="list-style-type: none"> ⇒ Keeping actual emissions across your entire dealership below the thresholds that trigger more extensive permitting: 50 tpy of PM and either 12.5 tpy (New York City Metropolitan Area) or 25 tpy (all other areas) of VOCs; and ⇒ Paying the annual fees required to keep this Registration up-to-date. <p>This Registration authorizes any potential future CRC campaign being conducted at the same dealership location. If your dealership never obtained this Registration, or has moved its location since obtaining it, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns.</p> | <p>Dealerships located in <u>Rockland County</u>: Comply with the operating certificate issued by the Rockland County Department of Health to your dealership for the previous CRC campaigns.</p> <ul style="list-style-type: none"> ⇒ This certificate authorizes any potential future CRC campaigns being conducted at the same dealership location. ⇒ If your dealership never obtained this certificate, or has moved its location since obtaining it, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns. <p>Dealerships located in <u>Westchester County</u>: Obtain a “waiver” of permitting requirements from Westchester County prior to beginning each CRC campaign. BEFORE beginning any CRC campaign, please call the EH&S Hotline (877-572-4347) so that TMS can work with you to obtain this waiver.</p> <p>Dealerships located in <u>New York City</u>: Do not conduct any CRC campaigns, but arrange for your customers’ vehicles to be processed by FAPS or another contractor approved by TMS.</p> |

| OHIO | |
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| <p>Do either of the following:</p> <p>(1) Comply with the Permit to Install and Operate (PTIO) issued by Ohio EPA to your dealership at the time of the Tacoma LSC 90D by</p> <ul style="list-style-type: none"> ⇒ Conducting all CRC campaigns at the specific address listed in the PTIO; ⇒ Processing no more than 1,398 vehicles per year for all CRC campaigns combined; ⇒ Complying with the recordkeeping and reporting requirements specified in the PTIO; and ⇒ Paying fees for the PTIO assessed by Ohio EPA. <u>OR</u> <p>(2) Follow the instructions in Part Two for revoking this PTIO and staying exempt from air permitting.</p> | <p>Dealerships located in <u>Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, or Warren County</u>: Confirm that you submitted an Automobile Refinishing Operations Notification to the local Ohio EPA District Office or Local Air Agency responsible for your county prior to beginning the Sequoia C0D; if so, then you may rely on this Notification for any potential future CRC campaign being conducted at the same location.</p> <p>If your dealership never submitted this Notification, or has moved its location since doing so, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns.</p> |
| PENNSYLVANIA | |
| <p>Remain exempt by</p> <ul style="list-style-type: none"> ⇒ Keeping total actual emissions from each CRC campaign under the thresholds established by the relevant air regulatory agency in its permit exemption determination: <ul style="list-style-type: none"> ○ <u>All Counties Other Than Allegheny and Philadelphia Counties</u>: 0.11 ppv and 2.7 tpy per campaign for VOCs and 0.1 ppv and 0.12 tons per campaign for PM. ○ <u>Allegheny County</u>: 0.1 tpy per campaign for VOCs and 0.12 tpy per campaign for PM. ○ <u>Philadelphia County</u>: 0.11 lbs./vehicle and 1.0 tpy from all campaigns combined for VOCs and 0.1 ppv and 0.12 tpy per campaign for PM. ⇒ Complying with the following other conditions in the permit exemption determination: <ul style="list-style-type: none"> ○ Process no more than seven vehicles per day; and ○ Use the Vaupel HSDR 3300 spray guns in a manner consistent with the written notification provided to your dealership by TMS with the guns. | <p>No additional requirements.</p> |

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| RHODE ISLAND | |
| Remain below permitting thresholds by keeping PTE for the CRC campaigns below the 100 lbs/day and 10 lbs/hr permitting thresholds for any single air contaminant and any combination of air contaminants – which you can do by adhering to the vehicle processing limit of no more than 1 vehicle every 2 hours. | No additional requirements. |
| TENNESSEE | |
| <p>Remain exempt by relying on the “insignificant activity” Determination of Agreement issued by the Tennessee Air Pollution Control Board to your dealership for the Sequoia COD.</p> <p>⇒ This Determination exempts any potential future CRC campaign being conducted at the same dealership location.</p> <p>⇒ If your dealership never obtained this Determination, or has moved its location since obtaining it, please call the EH&S Hotline (877-572-4347) BEFORE conducting any CRC campaigns.</p> | No additional requirements. |
| VERMONT | |
| <p>Remain exempt by:</p> <p>⇒ Keeping actual emissions across your entire dealership below the 5 tpy for VOCs and 5 tpy for PM thresholds that would trigger an annual registration.</p> <p>⇒ Maintaining on file the separate determination that no air permit is required, which TMS will obtain from the Vermont Department of Environmental Conservation for each CRC campaign and provide to your dealership.</p> | No additional requirements. |
| VIRGINIA | |
| Remain exempt by keeping PTE across your entire dealership below the minor source permitting thresholds of 25 tpy for VOCs and 25 tpy for PM. | No additional requirements. |

| WEST VIRGINIA | |
|--|---|
| <p>Remain exempt by:</p> <ul style="list-style-type: none"> ⇒ Keeping PTE and actual emissions of VOCs and PM for all CRC campaigns below the hourly, daily and yearly thresholds that would trigger air permitting – 6 lbs/hr, 144 lbs/day and 10 tpy. ⇒ Maintaining on file the separate determination that no air permit is required, which TMS will obtain from the West Virginia Department of Air Quality (DAQ) for each CRC campaign and provide to your dealership. ⇒ Maintaining records required by DAQ's determination for each CRC campaign that describe the campaign and the CRCs and document the PTE and actual emissions. (See Part Two for an emissions tracking log and copies of the appropriate documents.) | <p>No additional requirements.</p> |
| WISCONSIN | |
| <p>Remain exempt by keeping total actual emissions across your dealership under 10 tpy for VOCs and 10 tpy for PM.</p> | <p>No additional requirements.</p> |

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TOYOTA CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET

PART TWO – STATE COMPLIANCE SUPPLEMENT FOR OHIO

This **Part Two – State Compliance Supplement for Ohio** provides further details on the two types of obligations that apply to CRC campaigns conducted in Ohio:

- (1) federal, state and local regulations governing Volatile Organic Compounds (“VOCs”) and Particulate Matter (“PM”) air emissions, and
- (2) state and local fire, building, environmental, safety and zoning codes.

Your dealership should review this Part carefully and utilize it together with the **Part One – General Guide for Compliance**.

SUGGESTIONS FOR USING THIS PART TWO:

- **Carefully review and follow Step One and Step Two on the following pages.**
- **Identify and review the information for your dealership location in the table at Appendix A.**
- **Maintain records as provided for in Appendix B.**
- **Refer to Appendix C if additional information is needed for compliance with the federal, state and local requirements related to air emissions in Ohio.**

Step One

Before You Begin Any CRC Campaign, Your Dealership Located In Ohio Should Take The Additional Actions Below.

1. CONFIRM AIR PERMITTING COMPLIANCE.

a. Confirm that you will do one of the following:

i. Comply with the conditions of the Permit to Install and Operate (PTIO) issued to your dealership by the Ohio Environmental Protection Agency (Ohio EPA) at the time of the Tacoma LSC 90D by:

- (1) Conducting the CRC campaign at the specific address listed on the PTIO;
- (2) Not processing more than 1,398 vehicles per year from all CRC campaigns combined;
- (3) Complying with the recordkeeping and reporting requirements specified in the PTIO; and
- (4) Paying fees for the PTIO assessed by Ohio EPA. OR

ii. Sign the form available through your Regional Representative authorizing TMS to request that Ohio EPA revoke the PTIO issued to your dealership at the time of the Tacoma LSC 90D.

- (1) The PTIO is no longer needed because the CRC campaign will qualify for Ohio's "de minimis" exemption from air permitting **as long as your dealership adheres to the vehicle processing limits (see Step Two below) and all other requirements of this Dealer Information Packet.**

IMPORTANT: TMS will reimburse your dealership for any final fees assessed by Ohio EPA as part of the PTIO revocation process. If you choose not to revoke the PTIO, then your dealership will be responsible for ongoing fees and will not receive reimbursement from TMS.

b. Refer to **Summary of Federal, State and Local Regulations Related to Air Emissions for Ohio** in **Appendix C** for details.

2. CONFIRM LOCAL CODE COMPLIANCE.

a. Confirm compliance with the approval issued by your local fire code enforcement official in Ohio for previous CRC campaigns.

b. Review **Summary of Additional Fire and Other Local Requirements for Ohio** in **Appendix A** to determine whether your dealership is subject to any additional requirements, and if so, confirm your compliance.

3. **CONDUCT TRAINING.** (Dealerships located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Geauga, Greene, Hamilton, Lake, Lorain, Medina, Miami, Montgomery, Portage, Summit and Warren counties only)
 - a. Provide training prior to beginning each CRC campaign to all relevant employees, even if those employees have been involved in conducting other CRC campaigns.
 - b. To train, you should review the CRC Campaigns Dealer Information Packet and the Technical Instructions for the particular campaign with the employees.
 - c. Document all training with the **CRC Campaign Personnel Training Log** in **Appendix B**.

Step Two

Begin Conducting The CRC Campaign, But Do So In Compliance With Obligations That Apply In Ohio.

1. **COMPLY WITH HOURLY ALLOWABLE EMISSIONS RATE.** Keep PM emissions below the hourly allowable emissions rate by **processing no more than 1 vehicle every 2 hours**. Document adherence to this limit using the **CRC Campaign Daily Production Log** in **Appendix B**.
2. **FOLLOW STANDARD OPERATING PROCEDURES FOR CRC MATERIALS HANDLING, TRANSFER AND STORAGE.**
 - a. Store the CRCs in nonabsorbent, non-leaking containers, and keep those containers closed at all times, except when the container is being filled or emptied; and
 - b. Store absorbent applicators, such as cloth and paper that are moistened with the CRCs, in a closed, nonabsorbent, non-leaking container.
3. **COMPLY WITH AIR RECORDKEEPING.** Retain completed logs, your PTIO permit (if you choose not to revoke it per Step One above) and the following documents provided in **Appendix B** on file:
 - a. Process Overview for Toyota Motor Sales, U.S.A., Inc. CRC Campaigns;
 - b. The material safety data sheets for the two CRCs – Noxudol 300S and 712AM – being used for the CRC campaigns;
 - c. Ohio EPA letter dated August 27, 2009 approving the Vaupel HSDR 3300 as achieving transfer efficiency equivalent to a High Volume Low Pressure spray gun when being used to apply the CRC materials;
 - d. The Vaupel HSDR 3300 Spray Equipment Manufacturer's Specifications; and
 - e. CRC Campaigns Air Emissions Calculation Summary.

IMPORTANT: Your dealership should no longer use the logs, procedures and documents provided in the dealer information packets for the previous CRC campaigns, but should maintain previously completed logs for an appropriate period of time. While your dealership can make its own compliance decisions, it is recommended that you retain the above documents and all completed logs until 5 years after your dealership ceases its involvement in CRC campaigns.

If you have any questions after reviewing this Part Two – State Compliance Supplement for Ohio, 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 participating in the CRC campaigns.

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



**CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET**

PART TWO – STATE COMPLIANCE SUPPLEMENT FOR OHIO

**APPENDIX A – SUMMARY OF ADDITIONAL FIRE AND OTHER
LOCAL REQUIREMENTS FOR OHIO**

TMS obtained approval from the Division of State Fire Marshal (Division) for Ohio dealers to offer Tacoma LSC 90D. The Division's approval required each dealer to obtain an individual approval from their local fire and/or building code enforcement official and to maintain a minimum of six air changes per hour in the spray area.

At the time of Tundra B0D, TMS notified the Division of its substitution of a Class 3 material as the exterior CRC (the material used for LSC 90D was a Class 2) and of the possibility that Toyota may conduct additional CRC campaigns beyond B0D. The Division provided a general CRC campaign approval and stipulated, instead of a minimum of six air changes per hour in the spray area, that dealers provide existing approved natural or mechanical ventilation in the spray area. TMS instructed dealers to notify their local official of these developments and to continue to conduct any future CRC campaign consistent with both the Division's and their local official's approval.

In some local jurisdictions in Ohio, additional requirements may apply to any potential new CRC campaign pursuant to fire, building, environmental, safety and/or zoning codes. You should use this Summary as a guide to identify additional fire and other local code requirements potentially relevant to the CRC campaigns. For any such requirement identified, you should then determine whether the requirement applies to your dealership when conducting any potential CRC campaign, and if so, confirm your compliance.

IMPORTANT: This Summary contains information (including local official contact information) gathered by TMS in 2010 at the time of the Tundra B0D and is being provided as part of this CRC Campaigns Dealer Information Packet to support your dealership's continued compliance with additional fire and other local code requirements. Subsequent to 2010, however, it is possible that your local jurisdiction has enacted new codes or revised existing codes in a manner that would add, modify or eliminate the potentially relevant requirements identified in this Summary. It is your dealership's responsibility to keep informed of any changes in local codes that may impact the CRC campaigns and to adjust your compliance actions as necessary.

Table 1: Code Summary for Ohio Locations

| Location | Other Local Requirements |
|--|--|
| Akron – <ul style="list-style-type: none"> • Ganley Toyota • Montrose Toyota | Verify that dealership's current zoning and/or use permit allows the CRC campaign. Contact John Moore Zoning Division Manager 166 S. High Street, Room 400 Akron, OH 44308-1628 (330) 375-2350 |
| American Township (Lima) – Allan Nott Toyota | Verify that dealership's current zoning and/or use permit allows the CRC campaign. Contact Brad Settlage Zoning Inspector for American Township 102 Pioneer Road Elida, Ohio 45807 (419) 331-8651 |
| Amherst – Premier Toyota of Amherst | Do not conduct the CRC campaign in the front portion of your building within 30 feet of the street. Verify that dealership's current zoning and/or use permit the CRC campaign. Contact John Calvey Chief Building Official Building Department 480 Park Avenue Amherst, OH 44001 (440) 988-3734 |
| Anderson Township – Cincinnati Beechmont Toyota | Verify whether dealership is located within a Flood Plain Management Overlay District, and if so, comply with any applicable requirements related to the use, storage and disposal of CRC materials. Verify that dealership's current zoning and/or use permit allows the CRC campaign. Contact Barb Heffner Zoning Inspector Anderson Center 7850 Five Mile Road, Anderson Township, Ohio 45230 (513) 688-8400 |

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| <p>Athens – Don Wood Toyota</p> | <p>Verify whether dealership is located within a Wellhead Protection Area, a Wellhead Protection Zone, or a Special Flood Hazard Area, and if so, comply with any applicable requirements related to the use, storage and disposal of CRC materials.</p> <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Paul Logue Zoning Department of Development, Enforcement & Facilities City of Athens, Ohio 45701 (740) 592-3338</p> |
| <p>Beavercreek Township – Voss Toyota</p> | <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Beavercreek Township Zoning Department Office 1981 Dayton Xenia Road Beavercreek, Ohio 45434 USA (937) 306-0065</p> |
| <p>Bedford – Toyota of Bedford</p> | <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>James McReynolds Inspector City of Bedford Building Department 165 Center Road Bedford, Ohio 44146 (440) 735-6530</p> |

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| Boardman – Toyota of Boardman | <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Stephanie M. Landers Administrative Assistant Zoning Administration 8299 Market Street Boardman, Ohio 44512 (330) 726-4181</p> |
| Bowling Green – Thayer Chevrolet-Toyota | <p>Verify that dealership's current zoning and/or use permit the CRC campaign.</p> <p>Contact</p> <p>Heather Saylor Planning Director Administrative Services Building 304 N. Church Street Bowling Green, OH 43402 (2nd Floor) (419) 354-6218</p> |
| Brunswick – Brunswick Toyota | <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Roger Westfall Development Director The City of Brunswick 4095 Center Rd. Brunswick, OH 44212 (330) 558-6865</p> |
| Brook Park – Metro Toyota | <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>John Hurst, Acting Commissioner Building Department 6161 Engle Road Brook Park, OH 44142 (216) 433-7412</p> |

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| <p>Chillicothe Nourse Toyota</p> | <p>– Send any future CRC campaign-related communications to both the Fire Marshal and the Chief Building Official.</p> <p>Verify whether dealership is located within a Flood Plain Overlay District, and if so, comply with any applicable requirements related to the use, storage and disposal of CRC materials.</p> <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Kelly Kight, Chief Building Official Building Department 35 South Paint St. Chillicothe, OH 45601 (740) 773-8980</p> |
| <p>Cincinnati</p> | <p>For Kings Toyota, follow Deerfield Township requirements.</p> <p>For Toyota of Cincinnati, follow Colerain Township requirements.</p> <p>For Beechmont Toyota, follow Anderson Township requirements.</p> |
| <p>Cleveland – Metro Toyota</p> | <p>For Metro Toyota, follow Brook Park requirements.</p> |
| <p>Cleveland Heights – Motor Cars Toyota</p> | <p>Verify whether dealership is located within a Flood Plain Overlay District, and if so, comply with any applicable requirements related to the use, storage and disposal of CRC materials.</p> <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Kim Steigerwald Assistant Director Planning and Zoning 40 Severance Circle Cleveland Heights, OH 44118 (216) 291-4857</p> |

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| <p>Colerain Township – Toyota of Cincinnati</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area, and if so, comply with any applicable requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit allows the CRC campaign.</p> <p>Contact</p> <p>Susan H. Roschke, Ph.D. Planning and Zoning Administrator 4200 Springdale Rd. Colerain Township, Ohio 45251 (513) 385-7505</p> |
| <p>Columbus –</p> <ul style="list-style-type: none"> • German Toyota of Columbus • Tansky Sawmill Toyota • Toyota Direct • Toyota West | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Vince Papsidero Administrator, Planning Division 109 N. Front Street Columbus, Ohio 43215 (614) 645-8664</p> |
| <p>Deerfield Township – Kings Toyota</p> | <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Lois McKnight Community Development Director 4900 Parkway Drive, Suite 150 Mason, OH 45040 (513) 701-6958</p> |
| <p>Delaware – Byers Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Jerry Warner Planning and Community Development Department One South Sandusky St. Delaware, Ohio 43015 (740) 203-1600</p> |
| <p>Dublin – Tansky Sawmill Toyota</p> | <p>Based on a jurisdiction review, Tansky Sawmill Toyota is located outside of the Dublin city limits in Columbus.</p> |

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| Fairfield Performance Toyota | <p>– Verify whether dealership is located within a Wellhead Protection Area or a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Timothy Bachman Director, Development Services Department 5350 Pleasant Ave. Fairfield, Ohio 45014 (513) 867-5345</p> |
| Falls Township – Tansky Toyota | <p>– Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Ron Ball Falls Township Zoning Inspector (740) 452-5631</p> |
| Findlay – La Riche Toyota | <p>– Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Todd Richard Zoning Inspector, Zoning Office 318 Dorney Plaza, Room 306 Findlay, Ohio 45840 (419) 424-7108</p> |
| Jefferson – Nassief Toyota | <p>– Based on a jurisdiction review, Nassief Toyota is located outside of the Village of Jefferson limits in Jefferson Township.</p> |
| Jefferson Township –Nassief Toyota | <p>– Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Ralph Rice Jefferson Township Zoning Inspector (440) 576-7701</p> |

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| <p>Kent – Don Joseph Toyota</p> | <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Kim Brown, Code Inspector Building Department 930 Overholt Road Kent, OH 44240 (330) 678-8107</p> |
| <p>Lancaster – River Valley Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Building & Zoning Department 121 E Chestnut St, Suite 102 Lancaster OH 43130 (740) 687-6649</p> |
| <p>Lima – Allan Nott Toyota</p> | <p>Based on a jurisdiction review, Allan Nott Toyota is located outside of the Lima city limits in American Township.</p> |
| <p>Logan – Toyota of Logan</p> | <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>City of Logan Zoning Office 18 W Jennison Ave Logan, Ohio 43138 (740) 385-5369</p> |
| <p>Mansfield – Graham Toyota</p> | <p>All CRC campaign operations must be conducted within an enclosed building.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Cindy Baker Manager, Community Development 30 N. Diamond Street Mansfield, Ohio 44902 (419) 755-9795</p> |

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| <p>Marietta – C&C Dodge-Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Mike Stocky Development Administrator 304 Putnam Street Marietta, OH 45750 (740) 373-9354</p> |
| <p>Marion – McDaniel Toyota</p> | <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Judy Rawlins 233 West Center Street 3rd Floor Marion, Ohio 43302 (740) 383-4114</p> |
| <p>Maumee – Rouen Toyota</p> | <p>Verify whether dealership is located within a floodplain and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials that may apply.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Bruce Wholf Chief Building Officer, Building & Zoning 400 Conant Street Maumee, OH 43537 (419) 897-7075</p> |
| <p>Median Township – Brunswick Toyota</p> | <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Elaine Ridgley, Zoning Inspector Medina Township Zoning Office 3799 Huffman Road Medina, OH 44256 (330) 721-1997</p> |

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| Mentor – Classic Toyota | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Engineering & Building 8500 Civic Center Boulevard Mentor, Ohio 44060 (440) 974-5785</p> |
| Miamisburg – Walker Toyota | <p>Based on a jurisdiction review, the Walker Toyota dealership is located outside of the Miamisburg city limits in Montgomery County.</p> |
| Montgomery County – Walker Toyota | <p>Verify whether dealership is located within 100-year flood plain and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Maury Wyckoff, Chief Building Official Montgomery County Building Regulations Division 451 West Third St, Dayton, OH 45422 (937) 225-4586</p> |
| New Philadelphia – Ferris Toyota | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>James Zucal Service Director, Services Department 1234 Commercial Avenue SE New Philadelphia, Ohio 44663 (330) 308-5752</p> |

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| <p>Newark – Coughlin Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Kimberly Burton Director, Community Development 40 W. Main St. Newark, OH 4305 (740) 670-7533</p> |
| <p>North Canton (site in Jackson) – Cain Toyota</p> | <p>Based on a jurisdiction review, Cain Toyota is located outside of the North Canton city limits in Jackson Township.</p> |
| <p>North Olmsted – Sunnyside Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Dave Peltz Zoning Inspector 5200 Dover Center Road North Olmsted, Ohio 44070 (440) 777-8000, Ext. 4139</p> |
| <p>Perkins Township – Kasper Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Zoning Inspector Perkins Township Hall 1210 E. Bogart Road Sandusky, OH 44870 (419) 609-1435 or (419) 265-4595</p> |

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| <p>Portsmouth-- Glockner Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Daniel Saez, Director Community Development 2010 Charles Street Portsmouth, Ohio 45662 (740) 354-5673</p> |
| <p>Sandusky (Site in Perkins Township) – Kasper Toyota</p> | <p>Based on a jurisdiction review, Kasper Toyota is located outside of the Sandusky city limits in Perkins Township.</p> |
| <p>Springfield – Jeff Wyler Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Heather Whitmore, Administrator Planning & Zoning 76 East High Street Springfield, OH 45502 (937) 324-7372</p> |
| <p>Steubenville – Team Toyota</p> | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Christopher Petrossi, Urban Project Director Steubenville Planning and Development Office 308 Market Street, Room 205 Steubenville, OH 43952 (740) 283-6000, Ext. 1700</p> |
| <p>Sylvania Township – Jim White Toyota</p> | <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Tim DeWitt Zoning Department 4927 Hollan-Sylvania Rd. Sylvania, OH 43560 (419) 885-5276</p> |

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| Toledo – Jim White Toyota | Based on a jurisdiction review, Jim White Toyota is located outside of the Toledo city limits in Sylvania Township. |
| Vandalia – Joseph Airport Toyota | <p>Verify whether dealership is located within a Special Flood Hazard Area or Wellhead Protection Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Engineering & Inspection 333 J.E. Bohanan Drive Vandalia, OH 45377 (937) 898-3750</p> |
| Warren – Toyota of Warren | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign</p> <p>Contact</p> <p>Mr. Michael Keys, Director Community Development 418 Main Avenue SW Warren, Ohio 44481 (330) 841-2595</p> |
| Washington Court House – Gusweiler Toyota | <p>Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>City Of Washington Court House Building/Zoning Department 105 N. Main St. Washington C.H., OH 43160 (740) 636-2353</p> |

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|--|--|
| <p>Wooster Performance Toyota</p> | <p>– Verify whether dealership is located within a Special Flood Hazard Area and comply with any additional requirements related to the use, storage and disposal of CRC campaign materials.</p> <p>Verify that dealership's current zoning and/or use permit (if applicable) allows the CRC campaign.</p> <p>Contact</p> <p>Val Jesionek Planning / Zoning Manager, <i>Planning & Zoning Division</i> 538 N. Market St. Wooster, Ohio 44691 (330) 263-5238</p> |
| <p>Zanesville Tansky Toyota</p> | <p>– Based on a jurisdiction review, the Tansky Toyota is located outside the Zanesville city limits in Falls Township.</p> |



CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET

PART TWO – STATE COMPLIANCE SUPPLEMENT FOR OHIO

APPENDIX B – RECORDKEEPING FORMS AND
OTHER DOCUMENTS FOR OHIO

Your dealership should maintain appropriate compliance records. To assist you, TMS has developed three documents:

- ⇒ **CRC Campaign Vehicle Production Log**: Maintain this log to track the time spent on each vehicle, and thereby demonstrate your dealership's adherence to the vehicle processing limit and compliance with the allowable PM emissions rate. This log also allows your dealership to determine total VOC and PM emissions from the CRC campaigns on a daily, monthly and annual basis.
- ⇒ **Ohio Personnel Training Log**: Maintain this log to demonstrate that the employees conducting the CRC campaigns have been trained.

In addition to the foregoing documents, your dealership also should maintain copies of the following documents on file:

- ⇒ Process Overview for Toyota Motor Sales, U.S.A., Inc. CRC Campaigns;
- ⇒ The material safety data sheets for the two CRCs – Noxudol 300S and 712AM – being used for the CRC campaigns;
- ⇒ Vaupel HSDR 3300 Spray Equipment Manufacturer's Specifications;
- ⇒ CRC Campaigns Air Emissions Calculation Summary; and.
- ⇒ The Ohio EPA letter dated August 27, 2009 which provides a spray gun equivalency determination for the Vaupel HSDR 3300;

It is important that your dealership maintain the foregoing records for an appropriate period of time. While your dealership can make its own compliance decisions, ***it is recommended that you retain the above documents and all completed logs until 5 years after your dealership ceases its involvement in CRC campaigns.***

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CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET

CRC CAMPAIGN VEHICLE PRODUCTION LOG
OHIO

You have two options for completing the CRC Campaign Vehicle Production Log (VPL). Choose the option that fits best with your dealership's operations.

- **Option 1 -- Electronic Spreadsheet.** (Microsoft Excel version -- available on the C.L.E.A.N. Dealer website (<http://cleandealer.com>):
 - TMS has developed a VPL spreadsheet that will automatically calculate total VOCs and PM emissions from the CRC campaigns on a daily and monthly basis.
 - *If your dealership has the ability to create and maintain electronic records, then Option 1 will be the easiest for you.*
 - REMEMBER: It is important to follow the instructions on the spreadsheet carefully to ensure accuracy of the automatic VOC and PM emissions calculations.

- **Option 2 -- Hard-Copy Log**
 - For dealerships not able to utilize Option 1, TMS has developed a hard copy VPL that you will fill out manually to create appropriate records.
 - Use the "Emissions Estimator" Table on the VPL to determine the VOC and PM emissions for each vehicle processed based on the type of CRC kit (*i.e.*, part number) used for that vehicle.
 - Should you need to determine total VOC or PM emissions for any daily, monthly, annual or other time period, you can either:
 - add up the VOC emissions recorded for each vehicle processed during the time period, then do the same for PM; or
 - use the "Total Emissions Calculator" to determine total VOC or PM emissions based on the emissions factors provided for each type of CRC kit (*i.e.*, part number) and the number of each kit type used during the time period. *This approach may be best if your dealership has processed a large number of vehicles during the time period or if you are calculating total emissions over a long time period.*

Instructions for Completing the Ohio CRC Campaign Vehicle Production Log

Follow these 5 steps to complete the Ohio CRC Campaign Vehicle Production Log.

Keep the completed logs in your dealership's records for a period of five (5) years after your dealership ceases its involvement in CRC Campaigns.

Step 1:
Enter your dealership's name and the recording period at the top of each page of the VPL.

Step 2:
Enter the date on which you process the vehicle and its make and model year.

Step 3:
Enter the time you finish processing the vehicle and the type of CRC Kit (part number) used.

REMEMBER: To comply with air emissions limits, you should not process more than one vehicle every two hours.

Dealership Name: _____

Recording Period: _____
[Month/Year]

| Date | Vehicle Make and Model Year | Time of Completion | Kit Used (Part Number) | Emissions | |
|---------|-----------------------------|--------------------|------------------------|-----------|----------|
| | | | | VOC (lbs) | PM (lbs) |
| 3-1-12 | 2004 Tundra | 2:15 PM | 00289-T00KT-DS | 0.12 | 0.10 |
| 3-1-12 | 2003 Sequoia | 4:30 PM | 00289-S00KT-DS | 0.16 | 0.11 |
| 3-3-12 | 2007 Tundra | 10:00 AM | 00289-T00KT-DS | 0.12 | 0.10 |
| 3-10-12 | 2003 Tundra | 4:30 PM | 00289-T01KT-DS | 0.05 | 0.06 |
| | | | | | |
| | | | Total | 0.45 | 0.37 |

Step 4:
Using the Emissions Estimator below, enter the VOC and PM emissions for the vehicle on the VPL.

EMISSIONS ESTIMATOR

Locate the row in the table below that corresponds to the type of CRC Kit used to process each vehicle. Enter the VOC and PM emission values from the table below in the corresponding box of the VPL.

| Kit (Part Number): | VOC (lbs) | PM (lbs) |
|--------------------|-----------|----------|
| 00289-T00KT-DS | 0.12 | 0.10 |
| 00289-S00KT-DS | 0.16 | 0.11 |
| 00289-T01KT-DS | 0.05 | 0.06 |

Step 5:

Should you need to calculate your total VOC or PM emissions for any time period, you can either:

- a) add up the values in the VOC column for each vehicle processed during the time period, then do the same for the PM column; or,
- b) use the Total Emissions Calculator below to calculate VOC emissions during the time period, then do the same for PM.

TOTAL EMISSIONS CALCULATOR

From the VPL above, enter in Column A the number of vehicles processed with each type of CRC Kit during the time period. In Columns B and C, multiply the number in Column A by the listed VOC or PM emission factor. Finally, add up the values in each of Columns B and C to get the total VOCs and PM emitted. Enter these amounts in "Total" line on the VPL.

| | A | B | C |
|-------------------------|------------------------------------|---|---|
| Kit (Part Number) | Number of Vehicles Processed | VOC (lbs) | PM (lbs) |
| 00289- T00KT -DS | 2 | Multiply Col. A x 0.12 = 0.24 | Multiply Col. A x 0.10 = 0.20 |
| 00289- S00KT -DS | 1 | Multiply Col. A x 0.16 = 0.16 | Multiply Col. A x 0.11 = 0.11 |
| 00289- T01KT -DS | 1 | Multiply Col. A x 0.05 = 0.05 | Multiply Col. A x 0.06 = 0.06 |
| | Total | Sum of column B = 0.45 | Sum of column C = 0.37 |

KIT REFERENCE TABLE:

| Kit (Part Number) | Liters of Noxudol 300 S (VOC content = 0.09 lbs/gal) | Liters of 712 AM (VOC content = 0.165 lbs/gal) |
|-------------------------|--|--|
| 00289- T00KT -DS | 3 | 1 |
| 00289- S00KT -DS | 3 | 2 |
| 00289- T01KT -DS | 2 | 0 |

Note: Start a new VPL for the next recording period.

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Dealership: _____

Recording Period: _____
 [Month/Year]

Ohio CRC Campaign Vehicle Production Log

| Date | Vehicle Make and Model Year | Time of Completion | Kit Used (Part Number) | Emissions | |
|------|-----------------------------|--------------------|------------------------|-----------|----------|
| | | | | VOC (lbs) | PM (lbs) |
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| | | | TOTAL | | |

EMISSIONS ESTIMATOR

Locate the row in the table below that corresponds to the type of CRC Kit used to process each vehicle. Enter the VOC and PM emission values from the table below in the corresponding box of the VPL.

| Kit (Part Number): | VOC (lbs) | PM (lbs) |
|-------------------------|-------------|-------------|
| 00289- <u>T00KT</u> -DS | 0.12 | 0.10 |
| 00289- <u>S00KT</u> -DS | 0.16 | 0.11 |
| 00289- <u>T01KT</u> -DS | 0.05 | 0.06 |

Maintain these documents in your dealership's records for a period of five (5) years after your dealership ceases its involvement in CRC Campaigns.

Duplicate as Necessary

Dealership: _____

Recording Period: _____
 [Month/Year]

TOTAL EMISSIONS CALCULATOR

From the VPL above, enter in Column A the number of vehicles processed with each type of CRC Kit during the time period. In Columns B and C, multiply the number in Column A by the listed VOC or PM emission factor. Finally, add up the values in each of Columns B and C to get the total VOCs and PM emitted. Enter these amounts in "Total" line on the VPL.

| | A | B | C |
|--------------------------------|---|-----------------------------------|-----------------------------------|
| Kit (Part Number) | Number of Vehicles Processed | VOC (lbs) | PM (lbs) |
| 00289- <u>T00KT</u> -DS | | Multiply Col. A x 0.12 = _____ | Multiply Col. A x 0.10 = _____ |
| 00289- <u>S00KT</u> -DS | | Multiply Col. A x 0.16 = _____ | Multiply Col. A x 0.11 = _____ |
| 00289- <u>T01KT</u> -DS | | Multiply Col. A x 0.05 = _____ | Multiply Col. A x 0.06 = _____ |
| | Total | Sum of column B = _____ | Sum of column C = _____ |

Note: Start a new VPL for the next recording period.

Maintain these documents in your dealership's records for a period of five (5) years after your dealership ceases its involvement in CRC Campaigns.

Duplicate as Necessary

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CRC Campaign Personnel Training Log

Dealership name and location: _____ CRC Campaign _____

Instructions: Dealerships in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties must use this log to confirm that the employees conducting the Sequoia C0D have been trained as required by OHIO ADMIN. CODE 3745:21-18(C)(2). After you complete this training, this record should be sent to the appropriate Ohio EPA District Office for your dealership (see the *Nonattainment Counties - Notice & Recordkeeping Section* of the B0D Dealer Information Packet for mailing address). A copy of this log must be kept in your records for five years after completion of the C0D.

Pursuant to Pursuant to Ohio Admin. Code 3745:21-18(C)(2), the undersigned have reviewed all of the Corrosion Resistant Compound Campaign materials and understand the proper use, handling and operation of the CRC materials and equipment.

Employee Names/Date Trained:

Signature of Dealer Principal:

Date:

Address & Contact Information for Dealer Principal:

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

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CORROSION-RESISTANT COMPOUND CAMPAIGNS DEALER INFORMATION PACKET

CRC CAMPAIGN PROCESS OVERVIEW

Toyota has launched Corrosion-Resistant Compound ("CRC") campaigns for particular vehicles registered in certain cold climate states with high road salt use ("Cold Climate States") to address the potential for greater than expected levels of vehicle frame corrosion. This "CRC Campaign Process Overview" provides a general description of the process being used by Toyota dealers to apply CRCs to vehicle frame surfaces.

The CRC Campaigns entail the application of two Class IIIB combustible liquids ("CRCs") to an eligible vehicle's frame – one to the exterior and the other to interior frame surfaces – using a Vaupel HSDR 3300 spray gun. Toyota has issued dealers 2 of these spray guns, with instructions to dedicate one to the interior and the other to the exterior CRC and to use these guns only for the CRC campaigns. The CRC campaigns are occurring indoors in an existing dealership service area. Dealers have been instructed to comply with fire, zoning, air and building codes when conducting the CRC campaigns, including to comply with all recordkeeping and material handling requirements.

The CRC campaigns process consists of three primary steps:

1. **Work Area Setup**
2. **Vehicle Inspection and Preparation**
3. **CRC Application**

Step 1: Work Area Setup. Dealers are conducting the CRC campaigns in a dedicated work space in the dealership's service area that has a vehicle lift, is well ventilated, is located away from other vehicles, is at least 20 feet away from open flames, spark-producing equipment and drying, curing or fusion apparatuses, has appropriately-rated fire extinguishers in the immediate vicinity and can be sectioned off with temporary partitions. No physical alteration of the workspace or installation of new equipment is required for the CRC campaigns.

Step 2: Vehicle Inspection and Preparation. Dealers should employ the following procedures to prepare their service areas and vehicles for spraying.

- Visually Inspect for Frame Perforation Based On Toyota Inspection Criteria. If the vehicle frame has perforation in excess of Toyota's inspection criteria, then it will be replaced and CRCs will not be applied.
- Clean Frame. It may be necessary to clean the frame with mechanical methods, including pressure washing. No chemicals or solvents will be used to clean the frame.
- Place Vehicle on Lift. Raise the vehicle using the vehicle lift; remove certain vehicle components as necessary to apply the CRCs to the vehicle frame (e.g., tires and wheels, spare tire, engine under cover, bumper cover, etc.).
- Work Area Setup. Place tarp beneath vehicle and set up temporary partitions around vehicle. Tarps are intended to capture limited overspray and to facilitate clean-up.
- Prepare Frame. Manually remove rust from frame using scraper, chisel, and/or compressed air (e.g., air scalers).

- Clean Frame (Secondary Cleaning). Manually remove any remaining rust or dirt using wire brush and air nozzle.
- Secondary Visual Inspection. Visually inspect the frame to ensure no perforation meeting Toyota's criteria was uncovered during the manual rust removal and cleaning process.
- Temperature Measurement. Use an infrared thermometer to ensure the vehicle exhaust system has sufficiently cooled prior to any spraying.
- Mask Parts. Mask areas not to be sprayed (e.g., drive shaft, brake/hub assemblies, exhaust, other electrical components, etc.).
- Attach Plastic Sheet. Attach plastic sheet to frame capture any internal CRC that may drip through small holes in the frame; use magnets to suspend a plastic sheet underneath the frame.

Step 3: CRC Application. Dealers should apply the CRCs to vehicle frame surfaces as follows:

- Setup Spray Gun for Internal Frame CRC Application. Prepare the Vaupel HSDR 3300 spray gun dedicated to the interior CRC.
- Apply CRC to Interior of Frame. Insert select spray nozzle a specified distance into holes in the frame identified in the Technical Instructions for the particular CRC campaign. Press spray gun trigger and pull out nozzle at fixed speed while spraying interior surface of frame with the CRC. Complete the number of laps indicated in the Technical Instructions for each hole. When finished, wipe away any residual CRC on the frame's exterior with cloths or paper towels.
- Remove Plastic Sheet Suspended From Frame.
- Install Foam Blocks and Body Plugs. After spraying the CRC to the frame interior, insert foam blocks and body plugs to keep CRC in the frame's interior and to limit water and road spray from entering the frame or cross-members.
- Setup Spray Gun for External Frame CRC Application. Prepare the Vaupel HSDR 3300 spray gun dedicated to the exterior CRC.
- Apply CRC to Frame Exterior. Following spray gun set up, hold the unidirectional handheld spray nozzle a distances from the frame surface specified in the Technical Instructions for the particular CRC campaign. Press spray gun trigger and spray the CRC on the top of portion of the frame by moving spray nozzle at fixed speed across frame surface.
- Apply External Frame CRC to Lift Contact Points. Lower the vehicle halfway, reinstall wheels, lower vehicle and apply CRC to the areas where the lift arms touched.
- Raise Vehicle to Facilitate Post Spray Vehicle Restoration. Raise the vehicle and remove protective tape and all fire retardant sheeting and plastic coverings.
- Take Final Steps Necessary to Return Vehicle Customer. Reinstall components (such as the engine undercover); lower vehicle from lift; complete reinstallation of other components (such as the rear bumper cover); and place vehicle in a location where CRCs can cure for 24 hours before returning vehicle to customer.

MATERIAL SAFETY DATA SHEET

PARKER INDUSTRIES

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

EMERGENCY CONTACT:
CHEMTREC (800) 424-9300

HMIS HAZARD RATING

| | |
|---------------------|---|
| HEALTH | I |
| FIRE | I |
| REACTIVITY | 0 |
| PERSONAL PROTECTION | B |

Date of Review:

Revised: March 17, 2011

Date of Preparation: November 14, 2007

By: Y. Yamada

SECTION 1: PRODUCT IDENTIFICATION

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

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

SECTION 2: HAZARDOUS INGREDIENTS

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

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

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

SECTION 3: HEALTH HAZARD INFORMATION

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

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

Chronic Overexposure:

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

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

SECTION 4: FIRST AID PROCEDURES

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

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

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

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

SECTION 5: FIRE AND EXPLOSION HAZARD DATA

Flash Point: >200°C (TCC)

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

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

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

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

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

SECTION 6: SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

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

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

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

SECTION 7: SAFE HANDLING INFORMATION

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

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

SECTION 8: EXPOSURE CONTROLS

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

Ventilation: General and local exhaust.

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

SECTION 9: REACTIVITY HAZARD DATA

Stability: Stable

Incompatibility: Strong acids, oxidizing agents.

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

Hazardous Polymerization: Will not occur.

SECTION 10: PHYSICAL AND CHEMICAL PROPERTIES

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

SECTION 11: DISPOSAL CONSIDERATIONS

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

SECTION 12: REGULATORY INFORMATION

Volatile Organic Content: (EPA Method 24)

VOC per gallon:

0.165 lbs/gal

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

D001

EPA Hazard Category (40CFR Part 370):

DELAYED (CHRONIC)

SARA TITLE III

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

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

NONE

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

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

NONE

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

| CHEMICAL | CAS NO. | WT % | Final RQ Lbs |
|----------|---------|------|--------------|
|----------|---------|------|--------------|

NONE

CALIFORNIA PROPOSITION 65

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

| CHEMICAL | CAS NO. | Estimated Concentration % |
|----------|---------|---------------------------|
|----------|---------|---------------------------|

NONE

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



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

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

Synonyms: None
Chemical Name: Anti Rust Compound

Manufacturer: Auson AB
Verkstadsgatan 3
S-434 42 Kungsbacka
Sweden
www.auson.se

US Distributor: Soken Trade Corporation
12055 Sherman Way
North Hollywood, CA
USA
www.noxudolusa.com
(800) 598-3535
(818) 308-8427

PHONE: +46 300-562000
FAX: +46 300-562001

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

PREPARED BY: MSDS Authoring Services
VERSION: 1

ISSUE DATE: March 1, 2011
SUPERSEDES DATE: None

2. COMPOSITION / INFORMATION ON INGREDIENTS

CONTAINING: HAZARDOUS AND/OR REGULATED COMPONENTS

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

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

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



3. HAZARDS IDENTIFICATION

**EMERGENCY OVERVIEW:
CAUTION! COMBUSTIBLE LIQUID.**

HMIS/NFPA Rating: See Section 16

POTENTIAL HEALTH EFFECTS

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

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

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

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

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

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

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

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

TARGET ORGANS: Eyes, skin, and respiratory system.

CARCINOGENICITY:

OSHA: Not listed

ACGIH: Not listed

NTP: Not listed

IARC: Not listed

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

4. EMERGENCY AND FIRST AID PROCEDURES

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

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

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

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

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

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

5. FIRE AND EXPLOSION HAZARD DATA

FLAMMABLE PROPERTIES: Not flammable. Combustible.

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

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

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

LIMITS OF FLAMMABILITY IN GENERAL ACCORDANCE WITH ASTM E-681 AT 200°C

LOWER FLAMMABLE LIMIT (LFL): 1.81 %
UPPER FLAMMABLE LIMIT (UFL): See Note

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

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

EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide.

UNSUITABLE EXTINGUISHING MEDIA: Water spray may be unsuitable.

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

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

UNUSUAL FIRE AND EXPLOSION HAZARDS: Not applicable

HAZARDOUS DECOMPOSITION OR COMBUSTION PRODUCTS: Not available.

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES: Remove all sources of ignition.

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

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

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

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

OTHER INFORMATION: Report spills to authorities as required.

7. HANDLING AND STORAGE



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

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

SHELF LIFE: See label on packaging.

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

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

AIRBORNE EXPOSURE LIMITS: See Section 2 above.

| CAS NO. | CHEMICAL NAME |
|--------------------|--|
| 64741-88-4 | Solvent-refined heavy paraffinic distillate mg/m ³ |
| OSHA PEL-TWA: | 5 |
| OSHA PEL STEL: | none |
| OSHA PEL CEILING: | none |
| ACGIH TLV-TWA: | 5 |
| ACGIH TLV STEL: | none |
| ACGIH TLV CEILING: | none |

| | |
|--------------------|---|
| 68783-96-0 | PETROLEUM SULFONATE, CALCIUM SALT, CALCIUM HYDROXIDE AND CALCIUM CARBONATE DISPERSION MG/M ³ |
| OSHA PEL-TWA: | NONE |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | NONE |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

| | |
|--------------------|---|
| 68410-37-7 | FATTY ACIDS, TALL-OIL, POLYMERS WITH ISOPHTHALIC ACID, PENTAERYTHRITOL AND TALL OIL MG/M ³ |
| OSHA PEL-TWA: | NONE |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | NONE |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

| | |
|--------------------|---|
| 8002-74-2 | PARAFFIN AND HYDROCARBON WAXES MG/M ³ |
| OSHA PEL-TWA: | NONE |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | 2 (FUME) |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

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



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

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

| | |
|--------------------|--|
| 1317-65-3 | CALCIUM CARBONATE (LIMESTONE) MG/M3 |
| OSHA PEL-TWA: | 15 FOR TOTAL DUST; 5 FOR RESPIRABLE FRACTION |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | 0 FOR TOTAL DUST; 3 FOR RESPIRABLE FRACTION |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |
| 1333-86-4 | CARBON BLACK MG/M3 |
| OSHA PEL-TWA: | 3.5 |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | 3.5 |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |
| 14808-60-7 | CRYSTALLINE SILICA MG/M3 |
| OSHA PEL-TWA: | 10/(%SIO2+2) (RESPIRABLE) |
| OSHA PEL STEL: | NONE |
| OSHA PEL CEILING: | NONE |
| ACGIH TLV-TWA: | 0.025 (RESPIRABLE) |
| ACGIH TLV STEL: | NONE |
| ACGIH TLV CEILING: | NONE |

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

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

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

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

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

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



9. PHYSICAL/CHEMICAL CHARACTERISTICS

FORM: Highly viscous liquid
ODOR: Slight mineral oil like odor
SOLUBILITY IN WATER: Not soluble in water
EVAPORATION RATE: (BuAc=1): Not applicable
AUTOIGNITION TEMPERATURE: >750°F 399°C
pH: Not available
VISCOSITY: 500-650 Mpas - 73.4°F (23°C)
VOLATILE ORGANIC COMPOUNDS (VOC): 10.7 g/L using EPA Method 24
COLD FREEZE POINT (ASTM D97): +25
FREEZING POINT (ASTM D1177): This sample was too viscous to permit determination of its freeze point by ASTM 1177.

COLOR: Black
BOILING POINT: >390°F (>200°C)
SPECIFIC GRAVITY: .96 at 20°C (68°F) (Water =1)
POUR POINT (ASTM) D97): +30
FLASH POINT: 285°F (140°C) ASTM D93
PERCENT SOLIDS BY WEIGHT: 98.9%

VAPOR PRESSURE By Isoteniscope (ASTM D2879), torr:

| | |
|------------|------|
| 32°F..... | 0.28 |
| 68°F..... | 1.0 |
| 100°F..... | 2.7 |
| 150°F..... | 11 |
| 200°F..... | 34 |
| 250°F..... | 90 |
| 300°F..... | 160 |
| 350°F..... | 270 |
| 400°F..... | 426 |
| 450°F..... | 600 |
| 485°F..... | 760 |

10. STABILITY AND REACTIVITY

STABILITY: Stable under ordinary conditions (70°F (21°C) and 14.7 psig (760 mmHg)), of use and storage.
CONDITIONS TO AVOID: Combustible atmospheres. Heat, flames, ignition sources, water (absorbs readily) and incompatibles.
POLYMERIZATION: Not available.
INCOMPATIBILITY WITH OTHER MATERIALS: Do not store near other combustible materials.
DECOMPOSITION: Not available.

11. TOXICOLOGICAL INFORMATION

EFFECTS OF EXPOSURE
ACUTE INHALATION: LC50 not available
EYES: Irritant
SKIN: Irritant
ACUTE INGESTION: LD50 not available



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

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

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

MUTAGENIC OR REPRODUCTIVE/DEVELOPMENTAL EFFECTS: None expected.

12. ECOLOGICAL INFORMATION

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

PERSISTENCE AND DEGRADABILITY: This product is not readily degradable.

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

BIOACCUMULATION: This product is not expected to bioaccumulate.

13. DISPOSAL DATA

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

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

CONTAMINATED MATERIALS: Wash contaminated clothing before reuse.

14. TRANSPORTATION DATA

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

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



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

15. REGULATORY INFORMATION

U.S. FEDERAL REGULATORY STATUS

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

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

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

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

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

STATE REGULATIONS:

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

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

LOCAL REGULATIONS

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

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

INTERNATIONAL REGULATIONS:

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

16. OTHER INFORMATION

Label Requirements: **WARNING! COMBUSTABLE!**

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



MATERIAL SAFETY DATA SHEET

Noxudol 300 S

Last Updated April 18, 2011

National Fire Protection Association (NFPA):



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

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

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

Prepared By: Donato Polignone (MSDS Authoring Services)

Part Number: --

Approved By: Soken Trade Corporation

Approval Date: April 18, 2011

Supersedes Date: March 1, 2011

ADDITIONAL INFORMATION:

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

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

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

END OF MSDS

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OPERATING INSTRUCTIONS

CAVITY PRESSURE CONTAINER GUN 3300 HSDR

This gun may only be used for pressure containers which threads have a slot

Use as intended

- The CAVITY PRESSURE CONTAINER GUN is used for applying cavity spray products in conjunction with cavity spray tubes 3900 / 3901.

For your safety

- Hazard-free work with the device is only possible if you read the operating instructions and safety instructions through in full and strictly follow the instructions contained therein
- Arrange to have practical instruction before your first use.
- Check the device before each use
- Allow only a specialist to make repairs.
- Alteration or modification of the device is forbidden.
- Use only original accessories
- Use the device only with the prescribed pressure.
- Do not spray into flames or onto glowing bodies.
- Working areas must be brightly lit, well ventilated and must conform to applicable health and work safety regulations.
- Do not inhale spray mist.
- Store the device and its accessories out of reach of children.

Device Characteristics

**Max. Press. 8 bar Working Press. 2-6 bar
Capacity 1 liter**

Safety Instructions

- Check the gun for correct operation before use.
- The nozzle head (19) and ascending tube (31) must allow free flow
- Check the gun for visible damage.
- When dealing with chemical materials, observe the appropriate guidelines and safety rules.

Start up

- Check line pressure in the compressed-air distribution system and adjust if necessary
- For optimal operation of the compressed-air tool, clean, dry air is absolutely necessary.
- This can be provided by a water and oil separator integrated into the compressed-air system, which also considerably improves the spray behaviour.

Working Instructions / Application

- Fill the pressure container (32) with spray product.
- Immerse the pistol body with ascending tube into the spray product and screw the container to the underside of the gun
- Insert cavity spray tube with round spray nozzle or cavity spray tube with angle nozzle and nipple into the quick coupling (20).
- Connect the gun to the compressed-air supply.
- Depress the trigger to the first step and check whether spray air issues from the nozzle opening.
- Material flow rate is adjusted using the stop screw (7). An optimal spray pattern for each material can be obtained with this adjustment.
- Insert the spray tube with round nozzle into the cavity and slowly withdraw it, while at the same time depressing the trigger. Release the trigger before the round nozzle leaves the cavity (this will interrupt material flow).
- When the spray tube with angle nozzle is inserted, surfaces can be sprayed.
- Make absolutely certain that the spray tubes are not bent.

When finished working

- Blow the cavity spray tube clear with air; for this, depress the trigger to the first step.
- Remove cavity spray tube; disconnect the device from the air supply.

- Release pressure from the gun; for this purpose, turn the pressure container to the left until air escapes.
- Store the device and its accessories out of reach of children.
- Store the gun only upright if material remains in the pressure tank.

Cleaning

- Clean the gun after each use with cleaning agent. (If the gun is to remain unused for an extended period of about 4 weeks).

Attention

- Store the spray tubes only when they are clean; otherwise the spray slits may become clogged due to drying of the material.

Faults

- Valve bolt (8) is stuck or does not close:
Put oil on the valve bolt or into the air intake port of the gun. Depress the trigger (2) several times.
- Gun does not spray properly:
Spray nozzle (19), ascending tube (31), cavity spray tube round spray or angle nozzle or gun (1) partly clogged. Remove deposits with cleaning agent.

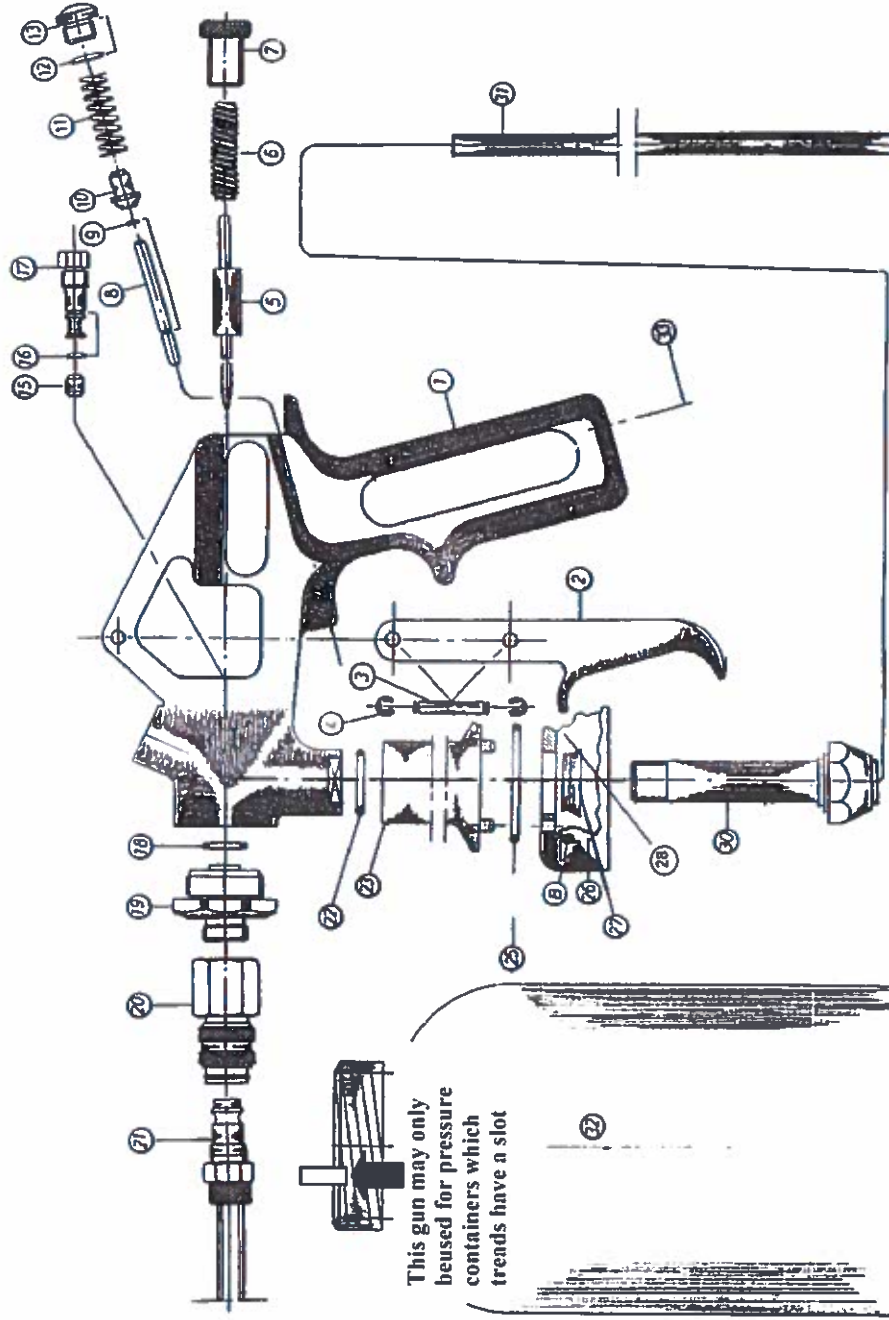
Environmental Protection

- The device, its accessories and packing material should be recycled in an environmentally correct manner.

Druckbehälterpistole pressure container gun

3300 HSDR

- 1 10 2919 001 gun body
- 2 50 3909 005 trigger
- 3 30 1102 006 trigger axle
- 4 60 3100 029 clamping ring
- 5 S 83010 nozzle needle, cpl.
- 6 60 3104 007 spring f. nozzle needle
- 7 30 1122 005 stop screw
- 8 30 1104 008 valve bolt
- 9 60 4100 027 o-ring 1.5x0.75
- 10 40 4101 011 valve seal
- 11 60 3103 003 spring f. valve
- 12 60 4100 062 o-ring 8x1
- 13 30 1120 002 locking screw
- 14
- 15 40 4100 003 needle seal, teflon
- 16 60 4100 064 o-ring 5x1
- 17 30 1422 016 needle stuffing box
- 18 60 4100 066 o-ring 8x2.5
- 19 30 2122 005 spray nozzle
- 20 20 1413 001 quick coupling
- 21 Capillary hose spray-set
- 22 60 4100 071 o-ring 15x2
- 23 40 4104 014 adaptor 3/000
- 25 60 4100 072 o-ring 33x2
- 26 10 2111 014 pressure tank filler cap
- 27 60 4100 044 V-packing
- 28 60 4100 087 o-ring 35x4
- 29
- 30 S 83302 assembly screw
- 31 60 3129 014 ascending tube
- 32 S 83308 pressure tank seal-set
- S 83303 seal-set
- S 80151 flat-nozzle - plug connection



**CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET**

CRC CAMPAIGN AIR EMISSION CALCULATION SUMMARY

Toyota Motor Sales, U.S.A., Inc. (TMS) has prepared this Summary to support its dealers conducting the Corrosion-Resistant Compound ("CRC") campaigns. This Summary explains the calculation of volatile organic compounds (VOCs) and particulate matter (PM) emissions from the CRC campaigns.

I. EXPLANATION OF VOC & PM EMISSION FACTORS

For CRC campaigns, Toyota dealers will use a Vaupel HSDR 3300 spray gun to apply two different CRC materials to the vehicle frame surfaces: (1) Noxudol 300 S (exterior frame surfaces) and (2) 712 AM (interior frame surfaces). Toyota dealers will be supplied with a pre-packaged "kit" that contains exactly the amount of each CRC needed for the vehicle.

The amount of each CRC needed depends upon the vehicle's frame dimensions and openings; due to slight variations among the different makes and model years of vehicles covered by the CRC campaigns, the amount of each CRC applied will not be the same for all vehicles. For the CRC campaigns, Toyota dealers will select among 3 different pre-packaged "kits" (each with different amounts of the CRCs) depending upon the particular make and model year of the vehicle being processed:

- 00289-T00KT-DS -- 0.792 gallons (3 liters) of Noxudol 300 S and 0.264 gallons (1 liter) of 712AM
- 00289-S00KT-DS -- 0.792 gallons (3 liters) of Noxudol 300 S and 0.528 gallons (2 liters) of 712AM
- 00289-T01KT-DS -- 0.528 gallons (2 liters) of Noxudol 300 S and no 712AM

TMS has developed a CRC Campaign Vehicle Production Log (VPL) that dealers can use to document compliance with air permitting requirements by tracking vehicle processing and calculating VOC and PM emissions from the CRC campaigns. As explained below, the VPL incorporates an emissions calculation for each of the three kits that relies on conservative assumptions. Thus, this calculation likely overstates emissions.

A. VOC Emissions

The VPL emissions calculation for VOCs assumes that all of the VOCs contained in Noxudol 300 S (0.09 pounds per gallon) and 712AM (0.165 pounds per gallon)¹ will be emitted to the ambient air during the CRC application process and/or post-application curing. Accordingly, the emission factors used in the VPL calculations account for the total quantity of VOCs in each kit type.

The following table summarizes the VOC emissions calculations for each CRC kit type.

| | Kit (Part) #00289- <u>T00</u> KT-DS (3 liters Noxudol, 1 liter 712AM) | Kit (Part) #00289- <u>S00</u> KT-DS (3 liters Noxudol, 2 liters 712AM) | Kit (Part) #00289- <u>T01</u> KT-DS (2 liters Noxudol, No 712AM) |
|--------------------------------|--|---|--|
| Noxudol 300 S | 0.792 gal (3 liters)/kit x 0.09 lbs VOC/gal = 0.071 lbs VOC/vehicle | 0.792 gal (3 liters)/kit x 0.09 lbs VOC/gal = 0.071 lbs VOC/vehicle | 0.528 gal (2 liters)/kit x 0.09 lbs VOC/gal = 0.048 lbs VOC/vehicle |
| 712AM | 0.264 gal (1 liter)/kit x 0.165 lbs VOC/gal = 0.044 lbs VOC/vehicle | 0.528 gal (2 liters)/kit x 0.165 lbs VOC/gal = 0.087 lbs VOC/vehicle | None |
| Combined VOC emissions: | = 0.12 lbs VOC/vehicle | = 0.16 lbs VOC/vehicle | = 0.05 lbs VOC/vehicle |

B. PM Emissions

The VPL emissions calculation for PM differs from that for VOCs. In particular, both of the CRCs contain solids; however, not all of the solids in the CRCs will be emitted to the ambient air as PM. Instead, two factors will reduce the amount of the solids emitted as PM:

- Some amount of the solids in the CRCs will adhere to the vehicle frame surfaces, and therefore, not be emitted to the ambient air. To determine this amount requires an assessment of the *transfer efficiency* of the Vaupel HSDR 3300 spray gun when being used to apply the CRCs.
- Some amount of the solids in the CRCs that do not adhere to the vehicle frame surfaces (*i.e.*, the "overspray") will adhere to other surfaces (*e.g.*, the tarp underneath the vehicle), and therefore, not be emitted to the ambient air. To determine this amount requires an assessment of the percentage of the overspray that will *fallout* (and adhere to other surfaces) and not be emitted to the ambient air.

The analysis of these factors for each of the CRCs is summarized below.

- **Noxudol 300 S:** TMS retained Concurrent Technologies Corporation (CTC) to perform two types of testing: (1) Testing to determine the Vaupel HSDR 3300 spray gun's transfer efficiency when being used to apply Noxudol 300 S to the external frame surfaces and (2) Testing to produce data relevant to the amount of the overspray that will fallout, which data were used by another TMS consultant, Environ Corporation (Environ), to determine a "fallout factor". The CTC testing demonstrate that the Vaupel HSDR 3300 spray gun

¹ The VOC content is provided in the manufacturer's Material Safety Data Sheets for Noxudol 300 S and 712AM.

achieves a transfer efficiency of at least 85% when being used to apply Noxudol 300 S to the external frame surfaces. Additionally, after analyzing the results of the CTC testing, Environ calculated a fallout factor of at least 90%, *i.e.*, of the 15% of the Noxudol 300 S that does not adhere to the vehicle frame surfaces (the “overspray”), 90% of that overspray will “fallout” and adhere to other surfaces and not be emitted to the ambient air.

- **712AM:** CTC could not perform similar testing for 712AM due to its application to interior frame surfaces and the closed frame configuration. However, Environ calculated the transfer efficiency based on the dimensions of the limited openings in the otherwise closed portions of the frame. This calculation indicates that the Vaupel HSDR 3300 spray gun achieves at least a 98.5% transfer efficiency when being used to apply 712AM to the interior frame surfaces.² Environ also has conservatively assumed a 75% fallout factor.

The PM emissions calculation has 2 steps:

- **Step One:** Use the transfer efficiency to determine the amount of solids that would not adhere to the vehicle frame surfaces, and therefore, would be potentially available for emission to the ambient air as PM; and
- **Step Two:** Use the fallout factor to reduce that amount of solids potentially available for emission, and thereby, determine the estimated actual PM emissions.

The following table summarizes the PM emissions calculations for each CRC kit type based on these 2 steps.

² The 98.5% value is the lowest transfer efficiency calculated for all of vehicles subject to CRC campaigns to date. TMS does not anticipate that the transfer efficiency will vary substantially for vehicle models that may be subject to a subsequent CRC campaign or that the impact on the PM emission factors will be significant. More specific information on the transfer efficiency value applicable to any future CRC campaigns will be available at that time.

| | Kit (Part) #00289-T00KT-DS (3 liters Noxudol, 1 liter 712AM) | Kit (Part) #00289-S00KT-DS (3 liters Noxudol, 2 liters 712AM) | Kit (Part) #00289-T01KT-DS (2 liters Noxudol, No 712AM) |
|---|--|---|---|
| STEP ONE – Determine amount of solids <i>potentially</i> available as PM emissions to ambient air (using transfer efficiency to determine the amount of solids that would not adhere to the vehicle frame surfaces) | | | |
| Noxudol | 0.792 gal (3 liters)/kit x 7.97 lbs/gal x 98.9% solids by weight x 15% (100% - 85% transfer efficiency) = 0.94 lbs PM/vehicle | 0.792 gal (3 liters)/kit x 7.97 lbs/gal x 98.9% solids by weight x 15% (100% - 85% transfer efficiency) = 0.94 lbs PM/vehicle | 0.528 gal (2 liters)/kit x 7.97 lbs/gal x 98.9% solids by weight x 15% (100% - 85% transfer efficiency) = 0.62 lbs PM/vehicle |
| 712AM | 0.264 gal (1 liter)/kit x 7.885 lbs/gal x 97.9% solids by weight x 1.5% (100% - 98.5% transfer efficiency) = 0.03 lbs PM/vehicle | 0.528 gal (2 liters)/kit x 7.885 lbs/gal x 97.9% solids by weight x 1.5% (100% - 98.5% transfer efficiency) = 0.06 lbs PM/vehicle | None |
| Combined potential PM emissions: | = 0.97 lbs PM/vehicle (solids available for emission to ambient air as PM) | = 1.0 lbs PM/vehicle (solids available for emission to ambient air as PM) | = 0.62 lbs PM/vehicle (solids available for emission to ambient air as PM) |
| STEP TWO – Determine Estimated Actual PM Emissions (using fallout factor to adjust (reduce) the amount of solids potentially available for emission) | | | |
| Noxudol (90% fallout factor) | 0.94 lbs PM/vehicle x 10% | 0.94 lbs PM/vehicle x 10% | 0.62 lbs PM/vehicle x 10% |
| 712AM (75% fallout factor) | + 0.03 lbs PM/vehicle x 25% | + 0.06 lbs PM/vehicle x 25% | -- |
| Estimated PM Emissions: | = 0.10 lbs PM/vehicle | = 0.11 lbs PM/vehicle | = 0.06 lbs PM/vehicle |

II. MAXIMUM POTENTIAL EMISSIONS

TMS also has calculated maximum potential emissions resulting from the CRC campaigns based on a conservative, worst-case operating scenario. This scenario reflects the following assumptions:

- A hypothetical “4th type” of vehicle kit that contains more of each CRC than the kits actually being used for the CRC campaigns: 0.792 gallons (3 liters) of Noxudol 300 S and 0.792 gallons (3 liters) of 712AM.
- A one hour vehicle processing time instead of the 2 hour vehicle processing time that TMS has advised its dealers to adhere to for all vehicles across the CRC campaigns.
- A continuous operation in a CRC campaign spray space, 24 hours per day, seven days per week.

Under these assumptions, a dealer could process 8,760 vehicles in any one year using a single spray space.

Actual emissions at any dealership will not come anywhere close to this worst-case operating scenario because dealers are using less CRCs, taking longer to process vehicles and do not engage in 24/7 CRC campaign processing. Nor does this scenario account for state and/or local regulatory limits or permit conditions that prevent dealerships from operating at the maximum scenario. Thus, the emissions calculations summarized below based on this scenario are truly "worst-case".

1. Maximum Operating Scenario – VOC Emissions

The processing of vehicles with this kit (assuming all VOCs contained in the CRCs are emitted to the ambient air) will result in VOC emissions of 0.2 pounds per vehicle ($0.792 \text{ gals/Noxudol 300 S per kit} \times 0.09 \text{ lbs/VOCs per gal} + 0.792 \text{ gals/712AM per kit} \times 0.165 \text{ lbs VOCs/gal} = 0.2 \text{ lbs VOCs/vehicle}$).

The maximum CRC processing rate, under which one vehicle would be treated per hour over a 24-hour day, would yield no more than 4.8 lbs VOCs per day ($0.2 \text{ lbs VOCs/vehicle} \times 24 \text{ vehicles/day} = 4.8 \text{ lbs VOCs/day}$) or, in the unlikely event a second spray space is used, 9.6 lbs VOCs/day.

Over an annual period, under the maximum annual CRC scenario, a dealer would emit no more than 0.88 tons of VOCs in any one year ($8,760 \text{ vehicles/year} \times 0.2 \text{ lbs VOCs/vehicle}$, divided by $2,000 \text{ lbs/ton} = 0.88 \text{ tons VOCs/year}$) or, if a second spray space is used, 1.76 tons VOCs/year.

2. Maximum Operating Scenario – PM Emissions

Step One: Noxudol has 0.94 pounds of solids per kit potentially available for emission to the ambient air as PM ($0.792 \text{ gals/kit} \times 7.97 \text{ lbs/gal} \times 98.9\% \text{ solids by weight} \times (100\% - 85\% \text{ transfer efficiency}) = 0.94 \text{ lbs PM/vehicle}$); 712AM has 0.09 pounds per kit potentially available ($0.792 \text{ gals/kit} \times 7.885 \text{ lbs/gallon} \times 97.9\% \text{ solids by weight} \times (100\% - 98.5\% \text{ transfer efficiency}) = 0.09 \text{ lbs PM/vehicle}$).

Step Two: Therefore, the hypothetical "4th" kit has 1.03 pounds of solids potentially available for emission to the ambient air as PM. Applying the 90% fallout factor for Noxudol 300 S and the 75% fallout factor for 712AM indicates that actual PM emissions would be no more than 0.12 pounds per vehicle ($0.94 \times 10\% + 0.09 \times 25\% = 0.12 \text{ lbs PM/vehicle}$).

The maximum CRC processing rate, under which one vehicle would be treated per hour over a 24-hour day, would yield no more than 2.88 lbs PM per day ($0.12 \text{ lbs/vehicle} \times 24 \text{ vehicles/day} = 2.88 \text{ lbs PM/day}$) or, if a second spray space is used, 5.76 lbs PM/day.

Over an annual period, under the maximum annual CRC operating scenario, a dealer would emit no more than 0.53 tons of PM in one year ($8,760 \text{ vehicles/year} \times 0.12 \text{ lbs/vehicle}$, divided by $2,000 \text{ lbs/ton} = 0.53 \text{ tons PM/year}$) or, if two spray spaces are used, 1.06 tons PM/year.

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State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE (614) 644-3020 FAX (614) 644-3184
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P.O. Box 1049
Columbus, OH 43216-1049

AUG 27 2009

Chuck Taylor, P.E.
GT Environmental/Toyota Motor Sales, Inc.
635 Park Meadow Road, Suite 112
Westerville, Ohio 4343081

Re: Vaupel HSDR 3300 spray gun transfer efficiency vs HVLP

Dear Mr. Taylor

This letter is in response to your letter dated August 3, 2009, in which you requested written approval to authorize the use of the Vaupel HSDR 3300 spray gun for the proposed implementation of a Limited Service Campaign (LSC) by Toyota Motor Sales in Ohio pursuant to Ohio Administrative Code (OAC) 3745-21-18(C)(1)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your letter, the supporting test documentation included in your letter and the approval letter from the South Coast Air Management District (SCAQMD) dated March 10, 2009.

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected county, specified in OAC rule 3745-21-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(1)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted indicates that the Vaupel HSDR 3300 spray gun is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as similarly found in the SCAQMD approval letter) and shall apply to any equipment operated in the affected counties in Ohio:

- a. The Vaupol HSDR 3300 spray gun shall only be used to apply Daubert NOX-RUST X128T and NOX-RUST 712AM corrosion preventive coatings to the frame rails of Toyota Tacoma trucks model years 2001-2004 at the approved Toyota

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



dealerships in Ohio that have been authorized to perform such service during the Limited Service Campaign.

- b. This approval is only valid if the air pressure supplied to the Vaupel HSDR 3300 spray gun is equal to or less than 50 psig when applying the Daubert NOX-RUST X128T coating and equal to or less than 75 psig when applying the Daubert NOX-RUST 712AM coating.
- c. This approval is only valid if during actual operation the Vaupel HSDR spray gun is equipped with a 160 psig (full scale) mechanical pressure gauge with markings every 2 psig and the pressure gauge is operating properly.
- d. The Vaupel HSDR 3300 spray gun shall be equipped with a Vaupel Cavity Spray Tube 3900/3901-WH spray wand when applying the corrosion preventive coatings. The Daubert NOX-RUST X128T protective coating shall only be applied to the exterior of the frame rails. The Daubert NOX-RUST 712AM protective coating shall only be applied to the interior of the frame rails. During operation, the maximum distance of the spray wand tip to the substrate to be coated shall not exceed 12 inches.
- e. This approval is only valid for the Vaupel HSDR 3300 spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by Ohio EPA.

By means of this letter I am approving the use of the Vaupel HSDR 3300 spray gun as an equivalent coating application method. Ohio EPA will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method and will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a link on our website for this rule which will indicate that this spray gun has been approved as an equivalent method to HVLP.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,



Chris Korleski
Director
Ohio EPA

cc: Lee Burkleca, DAPC



**CORROSION-RESISTANT COMPOUND CAMPAIGNS
DEALER INFORMATION PACKET**

PART TWO – STATE COMPLIANCE SUPPLEMENT FOR OHIO

**APPENDIX C – SUMMARY OF FEDERAL, STATE AND LOCAL
REGULATIONS RELATED TO AIR EMISSIONS FOR OHIO**

I. INTRODUCTION

The Corrosion Resistant Compound (CRC) campaigns for various models and model years of Toyota vehicles result in emissions of Volatile Organic Compounds (VOCs) and Particulate Matter (PM). Although Toyota Motor Sales, U.S.A., Inc. (TMS) has designed the CRC campaigns to minimize such emissions, the campaigns nevertheless are subject to various federal, state and local laws related to air emissions. To assist you in making compliance decisions for your dealership, TMS has prepared this summary of federal, state and local laws and regulations related to air emissions in Ohio as of March 2013.

IMPORTANT: You may wish to review this summary before beginning each CRC campaign and in particular whenever you have a need for details, such as, for example, when you are training a new employee who will be involved in the CRC campaigns.

II. AIR PERMITTING

Both federal and Ohio laws and regulations require an air permit for “major” and “minor” sources of VOCs and PM as described below.

1. Major Source

A major source is any source with a potential to emit (PTE)¹ at or above 100 tons per year (tpy) for PM and 100 tpy for VOCs.² TMS has calculated the PTE for each prior and ongoing CRC campaign. The PTE is just a small fraction of these major source thresholds.³ Thus, the CRC campaigns will not, standing alone, cause your dealership to trigger air permitting as a major source.

¹ “Potential to emit” or “PTE” refers to the maximum capacity of a stationary source to emit air pollutants under its physical and operational design. OAC § 3745-77-01(CC). The PTE calculation generally requires conservative assumptions, and a source’s actual emissions are usually well below its PTE.

² OAC § 3745-77-01(X)(2)-(3)(a). Sources in serious ozone nonattainment areas or ozone transport areas, severe ozone nonattainment areas and extreme ozone nonattainment areas with PTE of 50 tpy, 25 tpy or 10 tpy of VOCs, respectively, are considered major sources. OAC § 3745-77-01(X)(3)(a)-(b). Likewise, sources in serious PM nonattainment areas with PTE greater than 70 tpy of PM-10 are considered major sources. OAC § 3745-77-01(X)(3)(d). As of the time of writing this memorandum, no areas of Ohio were considered serious, severe or extreme nonattainment areas for ozone and no areas of Ohio were considered nonattainment areas for PM-10.

³ For details on this calculation, see the CRC Campaigns Air Emissions Calculation Summary in Appendix B of the Part Two – State Compliance Supplement for Ohio.

However, the major source air permitting thresholds must be applied across your entire dealership and not just to the CRC campaigns. For example, if your dealership's physical plant is distributed across multiple buildings, land parcels or physical locations, then the PTE from your activities at each of those buildings and locations would have to be combined to determine whether your dealership's total PTE falls below the thresholds. In some cases, even PTE from offsite locations that are not physically adjacent to a dealership (such as an offsite body shop) must be combined with the dealership's emissions to make this air permitting determination.

Therefore, operations besides the CRC campaigns could cause your dealership to trigger air permitting as a major source. It is not expected, however, that your dealership would do so as long as you satisfy the two criteria below:

- a. Your dealership does not operate a very large on-site or an off-site body shop;⁴ and
- b. Your dealership does not otherwise engage in significant painting, coating or other spraying operations.

2. Minor Source

A minor source is any source that (a) does not constitute a major source⁵ and (b) conducts an air emitting operation that does not qualify for permit exemption.⁶ Ohio offers various types of permit exemptions, including one for "de minimis" air emitting operations.⁷ To qualify for this de minimis exemption, an air emitting operation (in combination with any "similar" operations)⁸ must satisfy the following criteria:

- a. Not emit any air pollutant above 10 lbs/day⁹;
- b. Not be subject to a federal standard that limits emissions to less than 10 lbs/day;

⁴ A body shop or other operations that involve the use of spraying equipment will have a higher PTE than a regular vehicle service area. Thus, you cannot be certain – without further analysis – that your dealership will remain exempt from air permitting if it conducts such operations in addition to the CRC campaigns. In particular, if your dealership has an onsite body shop, then the state will require you to combine the PTE from that onsite body shop with the PTE from all other activities at the dealership. In doing so, it may not be possible for your dealership to conduct the CRC campaigns (which would add to the air emissions already coming from your body shop) and remain exempt from air permitting. Moreover, the state might require you to combine the PTE from an offsite body shop – even if the body shop is not where you will conduct the CRC campaigns – if that body shop has a sufficient interconnection to the rest of the activities at your dealership.

⁵ OAC § 3745-77-01(Y).

⁶ OAC § 3745-31-02(A)(1)(b); OAC § 3745-31-03.

⁷ OAC § 3745-15-05.

⁸ An operation would qualify as "similar" to the CRC campaigns if it involves (a) the same type of spray space set up; (b) the same or functionally similar materials to the CRCs; and (c) the application of those materials with a spray gun. See OAC § 3745-15-05(A)(7) (defining "similar" operations). TMS assumes that you are not conducting other operations that qualify as "similar" to the CRC campaigns, and therefore, that the de minimis exemption criteria apply only to the CRC campaigns, including in particular the 10 lbs/day emissions limit. If you are or believe that you might be conducting operations that qualify as "similar" to the CRC campaigns, please contact the EH&S Hotline (877-572-4347) to discuss your particular situation.

⁹ OAC § 3745-15-05(b).

- c. Not be subject to an emission limit adopted by Ohio EPA to achieve and maintain the national ambient air quality standards or protect public health and welfare that limits emissions to less than 10 lbs/day the emissions;
- d. Not emit radionuclides;
- e. Not have a PTE above 25 tpy; and
- f. Not emit more than one ton per year of any hazardous air pollutants or combination of hazardous air pollutants.¹⁰

The Tacoma LSC 90D did not satisfy the above criteria for the de minimis exemption due to the possibility that a dealership conducting the campaign could emit greater than 10 lbs/day of VOCs; nor did LSC 90D qualify for any other permit exemption. TMS worked with each dealership, therefore, to obtain a Permit To Install And Operation (PTIO) that authorized LSC 90D and any subsequent CRC campaigns.¹¹

With the substitution after Tacoma LSC 90D of the lower VOC-containing Noxudol 300S for X128T, actual and potential emissions of VOCs from the CRC campaigns were reduced below the 10 lbs/day level. Thus, as long as your dealership satisfies the other criteria above in b.-f., the CRC campaigns will qualify for the de minimis exemption, and you will no longer need the PTIO to conduct the CRC campaigns.

Given the PTIO triggers special reporting obligations as well as assessment of fees, TMS recommends that you revoke the PTIO. You can do so by signing the form available through your Regional Representative authorizing TMS to request that Ohio EPA revoke the PTIO issued to your dealership at the time of the Tacoma LSC 90D.

IMPORTANT: TMS will reimburse your dealership for any final fees assessed by Ohio EPA as part of the PTIO revocation process. If you choose not to revoke the PTIO, then your dealership will be responsible for ongoing fees and will not receive reimbursement from TMS.

¹⁰ OAC § 3745-15-05(C).

¹¹ This PTIO imposes the following conditions: (1) Conduct the CRC campaign at the specific address listed on the PTIO; (2) Do not process more than 1,398 vehicles per year from all CRC campaigns combined; (3) Comply with the recordkeeping and reporting requirements specified in the PTIO; and (4) Paying fees for the PTIO assessed by Ohio EPA.

IMPORTANT:

Both major and minor source permitting also can apply to sources that emit substances other than VOCs and PM, such as, for example, sources that emit Hazardous Air Pollutants (HAPs). The CRC campaigns do not emit substances other than VOCs and PM, and therefore, this summary does not address permitting or other obligations that may apply based on your dealership's emissions of other substances.

Minor source permitting will apply to any air emitting operations at your dealership that do not separately qualify for an exemption. In addition to the de minimis exemption, the regulations contain a number of exemptions that likely apply to the various operations at your dealership, but it is your responsibility to confirm eligibility for such exemptions and to maintain appropriate documentation.

III. AUTOMOTIVE REFINISHING OPERATIONS

Ohio imposes special requirements on "commercial motor vehicle and mobile equipment refinishing operations" in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Geauga, Greene, Hamilton, Lake, Lorain, Medina, Miami, Montgomery, Portage, Summit and Warren counties that may apply to the CRC campaigns.¹² To comply, you need to use the Vaupel HSDR 3300 spray guns approved by Ohio EPA as HVLP equivalent;¹³ follow housekeeping and pollution prevention measures in the CRC work area and for handling and storage of the CRC materials;¹⁴ conduct training for the CRC campaigns;¹⁵ and maintain certain records.¹⁶ The specifics of these obligations are addressed in Part Two (Steps One & Two) and in Appendix B of the State Compliance Supplement for Ohio.

IMPORTANT: Your dealership may engage in other commercial motor vehicle and mobile equipment refinishing operations besides the CRC campaigns which also are subject to these requirements. This summary does not address these requirements as applied to non-CRC materials and non-CRC campaign activities.

¹² See OAC § 3745-21-18. It is not certain that the CRC campaigns qualify as commercial motor vehicle and mobile equipment refinishing operations, but TMS recommends that you conduct each campaign in accordance with the commercial motor vehicle and mobile equipment refinishing operation requirements.

¹³ TMS obtained this approval from Ohio EPA as required by OAC § 3745-21-18(C)(3)(k). Appendix B to the Part Two – State Compliance Supplement for Ohio contains a copy of this approval for you to maintain on file as part of your recordkeeping obligations.

¹⁴ OAC § 3745-21-18(C)(6)(a)-(f).

¹⁵ OAC § 3745-21-18(C)(4). You may satisfy this training requirement by having each employee conducting the CRC campaign (1) read the Dealer Information Packet for CRC Campaigns, (2) this memorandum, and (3) the Technical Instructions for each CRC campaign.

¹⁶ OAC § 3745-21-18(E). Appendix C of the Part Two – State Compliance Supplement for Ohio includes a copy of the Ohio Personnel Training Log.

IV. PARTICULATE MATTER EMISSIONS LIMITS

Ohio regulations require sources to limit hourly emissions of PM.¹⁷ Under the regulations, an allowable PM emissions rate must be developed for each type of process using a "process weight rate" formula.¹⁸

The process weight rate for the CRC campaigns is a function of the amount of CRCs sprayed and the time it takes to spray them during processing of a vehicle. Due to the variation in amounts and application times as between CRC campaigns, the process weight rate – and therefore the applicable allowable PM emissions rate – will vary for each CRC campaign.

For each CRC campaign, TMS calculates both (1) the allowable PM emissions rate (using the process weight rate formula) and (2) the hourly PM emissions expected if the campaign is conducted in accordance with the Technical Instructions. TMS then compares (1) and (2) to make sure that each CRC campaign will fall below the allowable PM emissions rate applicable to it.

The calculation of hourly PM emissions for each CRC campaign incorporates assumptions regarding how long it will take you to process a vehicle. If you were to process a vehicle in a shorter amount of time, your actual hourly PM emissions could be higher and might not fall below the allowable PM emissions rate.

To assure compliance with the allowable PM emissions rate, your dealership should not process more than 1 vehicle every 2 hours. The Part One – Guide for Compliance to the CRC Campaigns Dealer Information Packet discusses the vehicle processing limit and provides guidance in its Appendix A on how to follow the limit. Appendix C of Part Two – State Compliance Supplement for Ohio includes a "CRC Campaign Vehicle Production Log" that your dealership should use to document its adherence to this limit.

V. RECORDKEEPING

Your dealership should maintain records to demonstrate your compliance with the training and housekeeping requirements discussed in Part III above and your adherence to the vehicle processing limit discussed in Part IV above. Please refer to Appendix B to the Part Two – State Compliance Supplement for Ohio for logs that you can use and for copies of documents to retain on file.

It is important that your dealership maintain records for an appropriate period of time. While your dealership can make its own compliance decisions, ***it is recommended that you retain the above documents and all completed logs until 5 years after your dealership ceases its involvement in CRC campaigns.***

¹⁷ OAC § 3745-17-11.

¹⁸ OAC § 3745-17-11(A)(2).

