

TOYOTA

TO: NEW YORK TOYOTA DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

DATE: January 2013

RE: Recordkeeping Forms for Sequoia C0D – CLARIFICATION

**CORROSION-RESISTANT COMPOUND CAMPAIGNS
IMPORTANT CLARIFICATION REGARDING YOUR
DEALER INFORMATION PACKET FOR SEQUOIA C0D
NEW YORK**

Toyota is launching a Corrosion-Resistant Compound (“CRC”) Campaign in New York for 2001-2004 model year (“MY”) Sequoia vehicles registered in certain cold climate states with high road salt use (“Cold Climate States”). For ease of reference, this Campaign will be referred to by its assigned internal designation -- “C0D.”

Enclosed is your Dealer Information Packet for Sequoia C0D. You should review this Packet carefully, but in doing so, please bear in mind the following clarifications:

1. References To Tundra B0D and Tacoma LSC 90D

- a. This Packet refers to two other CRC Campaigns – “Tundra B0D” and “Tacoma LSC 90D” -- as if your dealership is currently conducting these Campaigns. However, Tundra B0D and Tacoma LSC 90D ended on December 31, 2012; therefore, your dealership is no longer conducting these Campaigns.
- b. Statements in the enclosed Sequoia C0D Packet indicating that your dealership is currently conducting B0D and LSC 90D should instead be understood to refer to these Campaigns as having recently concluded. Please consider instructions about B0D and LSC 90D in that context.
- c. As one example, the Packet states: “Your dealership must conduct the Sequoia C0D in the same spray space(s) currently being used for the LSC/B0D Campaigns” You should understand this instruction to mean that “Your dealership must conduct the Sequoia C0D in the same spray space(s) previously used for the LSC/B0D Campaigns”

2. Current Recordkeeping Forms Included in the Tundra BXD Supplemental Packet

- a. Your dealership recently received a "Supplement To The Tundra B0D Dealer Information Packet", which explains that (1) the limited time offer portion of Tundra B0D ended on December 31, 2012, but (2) the Safety Recall, consisting of a CRC application of Noxudol 300 S only to the rear portion of the frame, will continue after December 31, 2012 and be referred to as "Tundra BXD".
- b. The Tundra BXD Supplemental Packet (sent out at the beginning of 2013) anticipated that your dealership would begin conducting Sequoia C0D in the near future, and therefore, it included updated recordkeeping forms that you can use for both BXD and C0D.
- c. Accordingly, you should use the "New York Tundra BXD and Sequoia C0D Daily Production Log" included in Appendix A of the Tundra BXD Supplemental Packet. **Do not use the "CRC Campaign Daily Production Log" included in the enclosed Sequoia C0D Packet.** For your convenience, an additional copy of the Daily Production Log for BXD and C0D is attached to this notice.

If you have any questions or concerns, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347).

TOYOTA

TO: NEW YORK DEALER PRINCIPALS, SERVICE MANAGERS AND PARTS MANAGERS

DATE: 2012

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

SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

NEW YORK DEALER INFORMATION PACKET

Toyota is launching a Corrosion-Resistant Compound ("CRC") Campaign for 2001-2004 model year ("MY") Sequoia vehicles registered in certain cold climate states with high road salt use ("Cold Climate States"). For ease of reference, this Campaign will be referred to by its assigned internal designation – "C0D."

For the Sequoia C0D, your dealership will use the same Vaupel HSDR 3300 spray guns already issued to you for the Tacoma LSC 90D and Tundra B0D (referred to together for ease of reference as the "LSC/B0D Campaigns") to apply the same CRC materials now being used for these Campaigns, *i.e.*, 712 AM and Noxudol 300 S. You will apply these CRCs in the same spray space(s) already being used for the LSC/B0D Campaigns.

Applying the CRC materials and using the Vaupel HSDR 3300 spray gun raises compliance obligations under federal, state and/or local laws related to ***air emissions, fire code approval and recordkeeping***. The Dealer Information Packet for the LSC/B0D Campaigns ("LSC/B0D Dealer Packet") contained a detailed explanation of these compliance obligations. This Sequoia C0D Dealer Information Packet does not repeat that discussion, but instead assumes your familiarity with these obligations and identifies the steps that Toyota Motor Sales, U.S.A., Inc. ("TMS") recommends you undertake to assure your dealership's continued compliance with these obligations while conducting the Sequoia C0D.

Please review this Dealer Information Packet carefully. If, after reviewing this Packet, you have any questions or concerns, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

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Step One

Before You Begin The Sequoia C0D, Re-Review the LSC/B0D Dealer Packet.

- 1 Due to the substantial similarities between the Sequoia C0D and the LSC/B0D Campaigns, this Dealer Information Packet does not repeat the extensive discussion of legal requirements set forth in the LSC/B0D Dealer Packet.
- 2 Instead, it is expected that you will carefully and fully re-review the LSC/B0D Dealer Packet prior to starting the Sequoia C0D, so that you understand all steps your dealership must take to comply with the applicable legal requirements while conducting the Sequoia C0D.
- 3 You received a copy of the LSC/B0D Dealer Packet previously, but in the event you need an additional copy, that Packet is available for download on the C.L.E.A.N. Dealer Website (<http://cleandealer.com>).

Step Two

Before You Begin The Sequoia C0D, Confirm That Your Dealership Satisfies All Of The Criteria Set Forth Below.

- 1 **Your dealership must conduct the Sequoia C0D in the same spray space(s)¹ currently being used for the LSC/B0D Campaigns and in accordance with the Technical Instructions for the Sequoia C0D.**
 - a. The spray space(s) currently being used for the LSC/B0D Campaigns have already been approved by your local fire code enforcement official.
 - b. To operate consistently with your local fire code approval, you must conduct the Sequoia C0D in the same spray space(s) currently being used for the LSC/B0D Campaigns and do so in accordance with the Technical Instructions for the Sequoia C0D.
 - c. If your dealership is not participating in the LSC/B0D Campaigns or will not conduct the Sequoia C0D in the same spray space(s) currently being used for the LSC/B0D Campaigns, you will need to obtain a new approval from your local fire code enforcement official. Please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.
- 2 **Your dealership must comply with the Air Facility Registration Certificate issued to you by the New York State Department of Environmental Conservation (NYSDEC) by continuing to follow all applicable air regulatory requirements as set forth in the LSC/B0D Dealer Packet.** These requirements are summarized below. You should refer to the LSC/B0D Dealer Packet for details.
 - a. Your dealership does not operate a very large on-site or an off-site body shop.
 - b. Your dealership keeps actual emissions across all operations below the thresholds that would trigger additional air permitting – *i.e.*, below 50 tons per year (“tpy”) of Particulate Matter (“PM”) and below either 12.5 (New York City

¹ As discussed in the LSC/B0D Dealer Packet, your dealership has the option of establishing a second spray space to allow for processing of more vehicles. If you choose to establish a second spray space, it must satisfy certain requirements and be approved by your local fire code enforcement officials. If you have not yet established a second spray space, but are now interested in doing so, please follow the instructions in the LSC/B0D Dealer Packet and call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) for assistance.

Metropolitan Area²) or 25 tpy (all other areas) of Volatile Organic Compounds ("VOCs").

- c. Your dealership restricts vehicle processing in order to assure that emissions remain below the levels that were presented by TMS to NYSDEC. You can do so by limiting your operations as follows:

- (1) **Process no more than one Tundra every 2 hours in any one spray space.**
- (2) **Process no more than one Sequoia every 2 hours in any one spray space.**
- (3) **Process no more than one Tacoma every 1.25 hours in any one spray space.**

Please refer to the LSC/B0D Dealer Packet for guidance on how to follow these vehicle processing restrictions.

- 3 Your dealership must continue to comply with all applicable fire, building and zoning code requirements as set forth in the LSC/B0D Dealer Packet.** These requirements are summarized below. You should refer to the LSC/B0D Dealer Packet for details.

- a. As noted above, your dealership should conduct the Sequoia C0D in the spray space(s) previously approved by your local fire code enforcement official and that are now being used to conduct the LSC/B0D Campaigns.
- b. If, when approving your spray space(s), the local fire code enforcement official issued you a conditional permit or approval that established special requirements or restrictions, then you must:
 - i. confirm that the permit or approval is not time-, vehicle- or CRC material-limited in such a way that it will not apply to the Sequoia C0D,³ and
 - ii. continue to comply with the special requirements or restrictions in the permit or approval.
- c. Your dealership also must continue to comply with any additional environmental, health, safety and zoning requirements identified for your local jurisdiction in "Table 1" of the LSC/B0D Dealer Packet.
- d. The LSC/B0D Dealer Packet contained a model letter for you to provide notice to your local fire code enforcement official, in writing, that your dealership planned to apply CRC materials to Tacoma and Tundra vehicles as well as possibly to other vehicle models. As long as you provided this notice prior to starting the LSC/B0D Campaigns, then you will not be required to provide any additional notice for the Sequoia C0D.

² The New York Metropolitan Area includes the five boroughs of New York City; Nassau, Suffolk, Westchester and Rockland Counties; and Lower Orange County Towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury).

³ If you are facing this situation, or you have any questions on this point, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) for assistance.

- e. During application of the CRCs in the spray space(s) approved by the local fire code enforcement official, your dealership must:
 - i. Maintain adequate ventilation in the CRC spray space(s) and their surrounding areas.
 - ii. Have no open flames, spark-producing equipment, or drying, curing, or fusion apparatuses within 20 feet of any approved spray space.
 - iii. Have fire extinguishers rated "B," "AB," or "ABC" in the vicinity of any approved spray space.
 - iv. Follow best management practices for handling and storage of the CRC materials.

If you cannot satisfy all of the foregoing criteria in Step Two above, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347) to discuss your particular situation.

Step Three Before You Begin The Sequoia C0D, Complete The Readiness Checklist Process

1. For the LSC/B0D Campaigns, you completed a detailed Readiness Survey to confirm that your dealership was ready to begin the campaigns. As long as your dealership will conduct the Sequoia C0D in the spray space(s) that already has (have) been approved by the local fire code enforcement official (and is (are) now being used to conduct the LSC/B0D Campaigns) and will otherwise satisfy the requirements in Steps One and Two above, then you may use a more simple Readiness Checklist process. To complete the Readiness Checklist process and confirm that your dealership is read to begin conducting the Sequoia C0D, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>).
2. Only after completing the Readiness Checklist process will your dealership be able to order kits with the CRC materials for the Sequoia C0D.

Step Four You Can Now Begin Conducting The Sequoia C0D, But Do So In Compliance With The Requirements Set Forth Below.

1. **Adhere to the vehicle processing limits discussed in Step Two above by not processing, for any one spray space, more than one Tundra every 2 hours, one Sequoia every 2 hours, or one Tacoma every 1.25 hours.** Please use the New York CRC Campaign Daily Production Log in Appendix A of this Packet to document that you are following these vehicle process restrictions. As noted above, the B0D Packet includes guidance on how to following these vehicle processing restrictions.
2. **Comply with air recordkeeping obligations that apply to both the LSC/B0D Campaigns and the Sequoia C0D by using the new form provided in Appendix A of this Packet. (You should no longer use the form provided with the LSC/B0D Dealer Packet, but you must keep the previously completed forms on file for the time period specified in the LSC/B0D Dealer Packet.)**
 - a. The LSC/B0D Dealer Packet details the air recordkeeping obligations that apply to CRC Campaigns.

- b. Your dealership must comply with these same obligations when conducting the Sequoia COD.⁴
- c. Appendix A to this Packet provides a new "New York CRC Campaign Daily Production Log" that you can use to meet these obligations for all three CRC campaigns – *i.e.*, the Tundra BOD, Tacoma LSC 90D and the Sequoia COD. With this Log, your dealership will track vehicle processing and demonstrate adherence to the vehicle processing limits discussed above. The information in this Log also can be used to calculate VOC and PM emissions produced by your dealership's CRC operations if needed in the future. In addition, this Log will serve as your compliance with 6 NYCRR § 228-1.5(a), which requires mobile equipment repair and refinishing facilities to keep a record of the quantity of coating used each month.
- d. Your dealership should keep copies of other records that describe the materials and equipment used to conduct the LSC/BOD Campaigns and the Sequoia COD. Copies of such documents were provided with the LSC/BOD Dealer Packet.

The steps outlined above, in conjunction with the more detailed explanation provided in the LSC/BOD Dealer Packet, should help to assure that your dealership conducts both the LSC/BOD Campaigns and the Sequoia COD in compliance with the relevant federal, state, and local requirements. This Sequoia COD Dealer Information Packet is not intended to cover other air, waste management, hazardous material, water, or other environmental laws and regulations that might apply to operations at your dealership other than the application of CRC materials as part of the LSC/BOD Campaigns or Sequoia COD. We assume that you already comply with other environmental, health, and safety requirements that apply to your facility.

If you have any questions after reviewing this Dealer Information Packet and the LSC/BOD Dealer Packet, or the Technical Instructions, please go to the C.L.E.A.N. Dealer website (<http://cleandealer.com>) or call the EH&S Hotline (877-572-4347).

Thank you for your cooperation.

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

⁴ Please note that while your dealership must comply with hazardous waste requirements generally, the materials associated with the LSC/BOD Campaigns and the Sequoia COD do not constitute "hazardous waste" when discarded. As such, neither the LSC/BOD Campaigns nor the Sequoia COD will generate hazardous waste or impact your dealership's hazardous waste generator status.



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SEQUOIA CORROSION-RESISTANT COMPOUND CAMPAIGN C0D

NEW YORK DEALER INFORMATION PACKET

APPENDIX A – AIR RECORDKEEPING FORM

Your dealership must maintain the records addressed in this Appendix to comply with state regulatory recordkeeping and retention requirements.

1. Production Log.

- a. This Appendix contains a new form entitled "New York CRC Campaign Daily Production Log" that you can use for all three CRC campaigns – i.e., the Tundra B0D, Tacoma LSC 90D and the Sequoia C0D. This Log is used to document vehicle processing and to demonstrate adherence to the vehicle processing procedures discussed above. The information in this Log also can be used to document VOC and PM emissions produced by your dealership's CRC operations.
- b. In addition, this Log will serve as a record of the quantity of coating used each day, as required by 23 NYCRR 201.15(a), which requires mobile equipment repair shops to maintain a record of the quantity of coating used each day.
- c. You no longer need to use the "New York Tacoma LSC 90D Production Log" that was included in the previously completed "New York B0D and LSC 90D Dealer Packet." **You must keep the previously completed "New York Tacoma LSC 90D Production Log" as specified in the LSC/B0D Dealer Packet.**

2. Other Documents And The New York State Department of Environmental Conservation

- a. The Air Recordkeeping forms included in the B0D Dealer Packet contained various documents that you should keep on file. You should continue to keep these documents on file for all three campaigns – i.e., the Tundra B0D, Tacoma LSC 90D and the Sequoia C0D. You should use the previously completed "New York B0D and LSC 90D Production Log" forms and completed "New York CRC Campaign Daily Production Log" forms.
- b. If you cannot locate these documents, then you can download the LSC/B0D Dealer Packet that contains these documents from the C.L.E.A.N. Dealer website (<http://cleandealer.com>).

Important: Please maintain these documents your dealership's records for a period of five (5) years after the last day that you spray a Tundra, Tacoma or Sequoia at your dealership.

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Instructions for Completing the New York CRC Campaign Daily Production Log

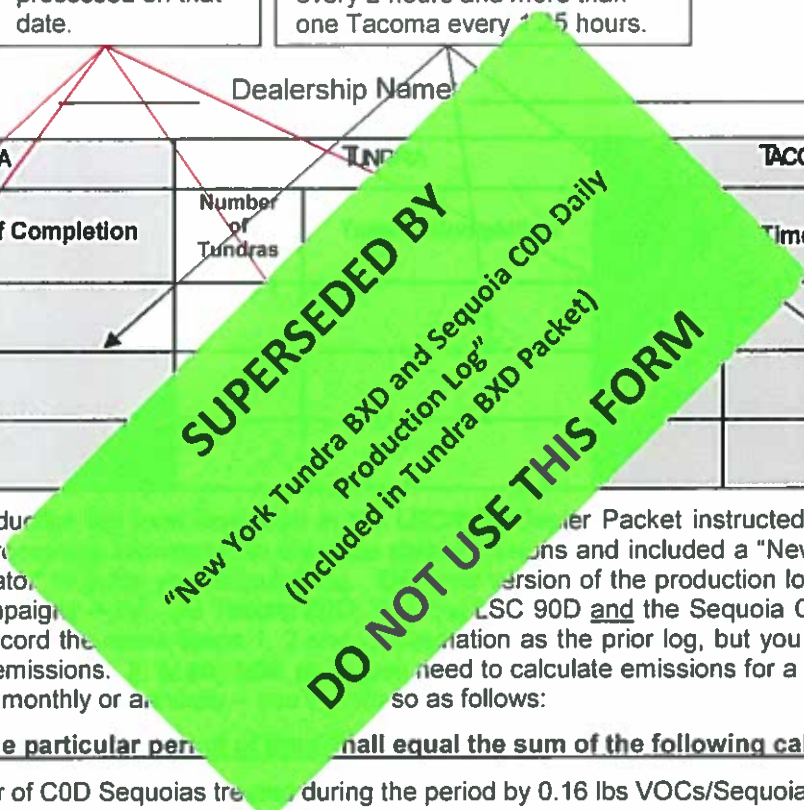
Follow these 3 steps to complete the New York CRC Campaign Daily Production Log.

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

<p>Step 1: Enter the "Reporting Year" and your "Dealership Name" at the top of the log.</p>	<p>Step 2: Enter the date and the number of Sequoia, Tundra and Tacoma vehicles that you processed on that date.</p>	<p>Step 3: Enter the time that you finished processing each vehicle. To comply with air emissions limits, you should not process more than one Sequoia or Tundra every 2 hours and more than one Tacoma every 1.5 hours.</p>
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Reporting Year: _____ Dealership Name: _____

Date	SEQUOIA		Number of Tundras	TACOMA	
	Number of Sequoias	Time of Completion		Time of Completion	



PLEASE NOTE: The production log was previously instructed you to follow a "Step 4" of using vehicle production information to calculate emissions and included a "New York B0D and LSC 90D Emissions Estimator" for tracking all three CRC campaigns. A new version of the production log to be used for tracking all three CRC campaigns (B0D, LSC 90D and the Sequoia C0D -- has been modified so that you will record the information as the prior log, but you will not follow a Step 4 and calculate daily emissions. If you need to calculate emissions for a particular period of time -- i.e., daily, weekly, monthly or annually -- you should do so as follows:

The VOC emissions for the particular period of time shall equal the sum of the following calculations:

- Multiply the number of C0D Sequoias treated during the period by 0.16 lbs VOCs/Sequoia;
- Multiply the number of B0D Tundras treated during the period by 0.11 lbs VOCs/Tundra; and
- Multiple the number of LSC 90D Tacomas treated during the period by 0.13 lbs VOCs/Tacoma.

The PM emissions for the particular period of time shall equal the sum of the following calculations:

- Multiply the number of C0D Sequoias treated during the period by 0.11 lbs PM/Sequoia;
- Multiply the number of B0D Tundras treated during the period by 0.10 lbs PM/Tundra; and
- Multiple the number of LSC 90D Tacomas treated during the period by 0.07 lbs PM/Tacoma.

If you have questions or need assistance with this log or calculating emissions, please call the C.L.E.A.N. Dealer EH&S Hotline (877-572-4347).

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