STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531
Telephone: (615) 532-0554

RECEIVED
APR 17 2002

NOT TO BE USED FOR
TITLE V APPLICATIONS

PERMIT APPLICATION

APC 20

PLEASE TYPE OR PRINT AND SUBMIT IN DUPLICATE FOR EACH EMISSION SOURCE. ATTACH APPROPRIATE SOURCE DESCRIPTION FORMS.

1. ORGANIZATION'S LEGAL NAME: TUTCO INC.
   FOR APC COMPANY — POINT NO: 71-0190-~~22~~ 01
2. MAILING ADDRESS (ST/RD P.O. BOX): 500 GOULD DR.
   APC LOG/PERMIT NO: 55446
   CITY: COOKEVILLE | STATE: TN | ZIP CODE: 38506 | PHONE WITH AREA CODE: 931-432-4141
3. PRINCIPAL TECHNICAL CONTACT: WILLIAM WIEGAND | PHONE WITH AREA CODE: 931-432-4141
4. SITE ADDRESS (ST/RD/HWY): 500 GOULD DR. | COUNTY NAME: PUTNAM
   CITY OR DISTANCE TO NEAREST TOWN: COOKEVILLE | ZIP CODE: 38506 | PHONE WITH AREA CODE: 931-432-4141
5. EMISSION SOURCE NO. (NUMBER WHICH UNIQUELY IDENTIFIES THIS SOURCE): 01
   PERMIT RENEWAL YES (✓) NO ( )
6. BRIEF DESCRIPTION OF EMISSION SOURCE

Renoform SVO 68, Ecoform SVO 95, & SVO 150 are mineral spirits with proprietery components (vanishing lubricant) used to lubricate steel strips & wire that Tutco Inc. runs thru progressive dies & wire equipment to produce production work in process. Isopropyl Alcohol 50% is used to clean a soap lubricant off of compressor heater sheaths as they are processed.

7. TYPE OF PERMIT REQUESTED

	STARTING DATE	COMPLETION DATE	LAST PERMIT NUMBER	EMISSION SOURCE REFERENCE NUMBER
CONSTRUCTION (✓)	8-1-2002	8-1-2002	053937P	71-0190-01

	DATE CONSTRUCTION STARTED	DATE COMPLETED	LAST PERMIT NUMBER	EMISSION SOURCE REFERENCE NUMBER
OPERATING ( )				

	TRANSFER DATE	LAST PERMIT NUMBER	EMISSION SOURCE REFERENCE NUMBER
LOCATION TRANSFER ( )			

ADDRESS OF LAST LOCATION

8. DESCRIBE CHANGES THAT HAVE BEEN MADE TO THIS EQUIPMENT OR OPERATION SINCE THE LAST CONSTRUCTION OR OPERATING PERMIT APPLICATION

Tutco Inc. is using Isopropyl Alcohol 50% for cleaning purposes in a specific production application.

9. SIGNATURE (APPLICATION MUST BE SIGNED BEFORE IT WILL BE PROCESSED): William Wiegand | DATE: 4/12/02
10. SIGNER'S NAME (TYPE OR PRINT): WILLIAM WIEGAND | TITLE: MFG. ENG. MGR. | PHONE WITH AREA CODE: 931-432-4141

TABLE OF POLLUTION REDUCTION DEVICE OR METHOD CODES
(ALPHABETICAL LISTING)

NOTE: FOR CYCLONES, SETTLING CHAMBERS, WET SCRUBBERS, AND ELECTROSTATIC PRECIPITATORS, THE EFFICIENCY RANGES CORRESPOND TO THE FOLLOWING PERCENTAGES

HIGH: 95 – 99+%, MEDIUM: 80 – 95%, AND LOW: LESS THAN 80%

IF THE SYSTEM HAS SEVERAL PIECES OF CONNECTED CONTROL EQUIPMENT, INDICATE THE SEQUENCE: FOR EXAMPLE 008'010: 97%

IF NONE OF THE BELOW CODES FIT, USE 999 AS A CODE FOR OTHER AND SPECIFY IN THE COMMENTS

NO EQUIPMENT	000
ACTIVATED CARBON ADSORPTION	048
AFTERBURNER — DIRECT FLAME	021
AFTERBURNER — DIRECT FLAME WITH HEAT EXCHANGER	022
AFTERBURNER — CATALYTIC	019
AFTERBURNER — CATALYTIC WITH HEAT EXCHANGER	020
ALKALIZED ALUMINA	040
CATALYTIC OXIDATION — FLUE GAS DESULFURIZATION	039
CYCLONE — HIGH EFFICIENCY	007
CYCLONE — MEDIUM EFFICIENCY	008
CYCLONE — LOW EFFICIENCY	009
DUST SUPPRESSION BY CHEMICAL STABILIZERS OR WETTING AGENTS	062
ELECTROSTATIC PRECIPITATOR — HIGH EFFICIENCY	010
ELECTROSTATIC PRECIPITATOR — MEDIUM EFFICIENCY	011
ELECTROSTATIC PRECIPITATOR — LOW EFFICIENCY	012
FABRIC FILTER — HIGH TEMPERATURE	016
FABRIC FILTER — MEDIUM TEMPERATURE	017
FABRIC FILTER — LOW TEMPERATURE	018
FABRIC FILTER — METAL SCREEN (COTTON GINS	059
FLARING	023
GAS ADSORPTION COLUMN — PACKED	050
GAS ADSORPTION COLUMN — TRAY TYPE	051
GAS SCRUBBER (GENERAL: NOT CLASSIFIED)	013
LIMESTONE INJECTION — DRY	041
LIMESTONE INJECTION — WET	042
LIQUID FILTRATION SYSTEM	049
MIST ELIMINATOR — HIGH VELOCITY	014
MIST ELIMINATOR — LOW VELOCITY	015
PROCESS CHANGE	046
PROCESS ENCLOSED	054
PROCESS GAS RECOVERY	060
SETTLING CHAMBER — HIGH EFFICIENCY	004
SETTLING CHAMBER — MEDIUM EFFICIENCY	005
SETTLING CHAMBER — LOW EFFICIENCY	006
SPRAY TOWER (GASEOUS CONTROL ONLY)	052
SULFURIC ACID PLANT — CONTACT PROCESS	043
SULFURIC ACID PLANT — DOUBLE CONTACT PROCESS	044
SULFUR PLANT	045
VAPOR RECOVERY SYSTEM (INCLUDING CONDENSERS, HOODING AND OTHER ENCLOSURES)	047
VENTURI SCRUBBER (GASEOUS CONTROL ONLY)	053
WET SCRUBBER — HIGH EFFICIENCY	001
WET SCRUBBER— MEDIUM EFFICIENCY	002
WET SCRUBBER — LOW EFFICIENCY	003
WET SUPPRESSION BY WATER SPRAYS	061

TABLE OF EMISSION ESTIMATION METHOD CODES

NOT APPLICABLE: EMISSIONS ARE KNOWN TO BE ZERO	0
EMISSIONS BASED ON SOURCE TESTING	1
EMISSIONS BASED ON MATERIAL BALANCE USING ENGINEERING EXPERTISE AND KNOWLEDGE OF PROCESS	2
EMISSIONS CALCULATED USING EMISSION FACTORS FROM EPA PUBLICATION NO. AP-42 COMPILATION OF AIR POLLUTANT EMISSION FACTORS	3
JUDGEMENT	4
EMISSIONS CALCULATED USING A SPECIAL EMISSION FACTOR DIFFERING FROM THAT IN AP-42	5
OTHER (SPECIFY IN COMMENTS)	6

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SURFACE COATING DESCRIPTION

APC 31

PLEASE TYPE OR PRINT AND SUBMIT IN DUPLICATE FOR EACH SPRAY BOOTH, DIP TANK OR OTHER SURFACE COATING EQUIPMENT, ATTACH TO THE PERMIT APPLICATION.

1. ORGANIZATION NAME: Tutco Inc.
/// FOR APC — APC COMPANY – POINT NO.:

2. EMISSION SOURCE NO. (AS ON PERMIT APPLICATION): 01
SIC CODE: 3634
APC SEQUENCE NO.:

3. SOURCE LATITUDE: 38° - 8min - 5sec | LONGITUDE: 85° - 32min - 11sec | UTM VERTICAL: N/A | UTM HORIZONTAL: N/A

4. TYPE OF COATING OPERATION → | SPRAY BOOTH: | DIP TANK: | OTHER (DESCRIBE): Lubrication of steel strips

5. MANUFACTURER: | MODEL NUMBER: | SERIAL NUMBER (OR PLANT ID):

CONSTRUCTION DATE: | MODIFICATION DATE:

DESCRIBE ANY MODIFICATIONS*:

6. DESCRIBE ARTICLES COATED

Parts coated are heater plates, terminal plates, mounting brackets, wire frames, wire supports, etc. with the vanishing lubricants that evaporate dry. The other parts are sheaths for compressor heaters that are cleaned of soap lubricant and evaporates dry.

7. NORMAL OPERATION: →	HOURS/DAY	DAYS/WEEK	WEEKS/YEAR	DAYS/YEAR
	16	5	49	245

8. SPRAY BOOTH DIMENSIONS (FT): →	WIDTH	HEIGHT	DEPTH	NUMBER OF OPEN SIDES

9. METHOD OF SPRAY: →	AIRLESS	AIR ATOMIZED	ELECTROSTATIC AIRLESS	ELECTROSTATIC DISC	ELECTROSTATIC AIR ATOMIZED	OVERSPRAY (PERCENT)	DATE PURCHASED*
		✓					

10. EXHAUST FAN DATA: →	NUMBER OF FANS	TOTAL HORSEPOWER	TOTAL VOLUME (CFM)

11. EXHAUST CONTROL: →	NONE	WATERWASH	EXHAUST FILTERS	BAFFLE PLATES	ADSORPTION**	OTHER**
	✓					Open to the plants space.

12. EXHAUST STACK DATA*** →	DIAMETER (FT)	HEIGHT (FT) ABOVE GRADE	FLOW (CFM)	SPECIFY SERIAL NOS. THAT SHARE THIS VENT

*THE ACTUAL SURFACE COATING EQUIPMENT (SPRAY GUN, SPRAY HEADS, ETC.), AND NOT THE SPRAY BOOTH PER SE, DETERMINES THE STATUS OF THE SOURCE (NEW OR EXISTING).
**ATTACH A DETAILED DESCRIPTION.
***COMPLETE ONE LINE FOR EACH STACK OR VENT.

NOTE: THIS APPLICATION WILL NOT BE PROCESSED UNLESS ALL OF THE FOLLOWING INFORMATION IS PROVIDED.

13. COATINGS AND THINNERS USED: LIST ALL TYPES OF COATINGS AND THINNERS USED AND ATTACH A STATEMENT OF THE CHEMICAL COMPOSITION OF EACH. THIS STATEMENT USUALLY MAY BE OBTAINED FROM THE COATING OR THINNER SUPPLIER. THE MINIMUM INFORMATION REQUIRED IS THE PERCENT OF SOLIDS BY WEIGHT, THE PERCENT VOLATILE BY WEIGHT, THE HYDROCARBON COMPOSITION AND/OR DESCRIPTION OF THE VOLATILE COMPONENT, AND THE DENSITY OF THE COATING OR THINNER IN POUNDS PER GALLON.

LINE ID	COATING NAME	% SOLIDS BY WT	% VOLATILE BY WT	DENSITY (LBS/GAL)	QUANTITY USED GALLONS/DAY AVERAGE	QUANTITY USED GALLONS/DAY MAXIMUM*	QUANTITY USED GAL/MO AVERAGE
A.	Ecoform SVO150	0	97	6.25	.05	1.0	1.0
B.	Ecoform SVO95	0	95	6.33	.20	1.0	5.0
C.	Renoform SVO 68	0	98	6.50	30	35	600
	THINNER NAME						
D.	Isopropyl Alcohol 50%	0	44	7.44	8	10	180
E.							
F.							
	CLEAN-UP SOLVENT NAME						
G.							
H.							

14. SIGNATURE: William Wiegand | DATE: 4/12/02

***NOTE:** FOR NEW CONSTRUCTION THIS QUANTITY WILL BE USED AS A PERMIT LIMITATION ON CAPACITY.

FUCHS LUBRICANTS CO.

April 11, 2002

Mr. Bill Wiegand
Engineering
Tutco
Cookeville TN

Fax: (931) 432-5912

Dear Bill:

Per your request, here are VOC calculations for the vanishing oils we use in the Press Department.

Ecoform SVO 95T	6.01 pounds per gallon
Ecoform SVO 150	6.06 pounds per gallon
Renoform SVO 68	6.37 pounds per gallon

Please let me know if I may be of further service.

Regards,

Chris

Chris Fette
Sales Manager

Replacing previous MSDS - pull old MSDS from your book.

FUCHS LUBRICANTS CO.

cc: Warehouse, Bill Weigand, Maintenance, Fabrication 1st Aid 11-14-00

SECTION 1 - PRODUCT AND COMPANY IDENTIFICATION

Used in Fabrication Dept.

PRODUCT IDENTIFICATION: . . . : ECOFORM SVO 95

Health: 2
Flammability: 2
Reactivity: 0
PPE: B
11-14-00

MANUFACTURER IDENTIFICATION

Company Name.	: FUCHS LUBRICANTS CO.
Address	: 17050 LATHROP AVE.
	HARVEY IL 60426
Telephone	: 708-333-8900
Emergency Contact	: Regulatory Compliance Department
Emergency Telephone . . .	: 708-333-8900 (8am - 5pm CST, M-F)
	800-255-3924 (24 Hours)

MSDS PRINT DATE . . . . . : 11/01/2000

* EMERGENCY OVERVIEW

This product is a liquid that is not soluble in water. Eye contact may cause moderate irritation. Short term skin contact may cause moderate irritation. Short term inhalation of high vapor or mist levels may irritate the upper respiratory tract. Ingestion is not an anticipated exposure route.

* HMIS Rating: Health- 2 Flammability- 2 Reactivity- 0 PPE- B

SECTION 2 - COMPONENT DATA

Components listed in this section may contribute to the potential hazards associated with exposure to the concentrate. The product may contain additional non-hazardous or trade-secret components.

Mineral spirits Cas#: proprietery Percent: < 95

Exposure Limit:

ACGIH TLV:	100 ppm
OSHA PEL:	100 ppm

- Carcinogenic Components: This product contains no carcinogens.

SECTION 3 - HAZARDS IDENTIFICATION

POTENTIAL HEALTH EFFECTS and SYMPTOMS from SHORT TERM/ACUTE EXPOSURE:

- EYE EXPOSURE -

This product is not expected to cause eye irritation under normal conditions of use. Symptoms of moderate eye irritation with stinging, tearing, redness and blurred vision may result upon direct contact or exposure to high mist levels in poorly ventilated areas.

- SKIN EXPOSURE -

Short term skin contact may cause moderate skin irritation. Prolonged or repeated direct exposure to the skin may result in symptoms of

irritation and redness. In severe cases, prolonged or repeated contact may result in dermatitis accompanied by symptoms of irritation, itching, dryness, cracking and/or inflammation.

- INHALATION -
This product is not expected to cause respiratory tract irritation during normal conditions of use. Exposure to high mist or vapor levels in poorly ventilated areas may cause upper respiratory tract irritation Severe exposure to high mist or vapor levels may cause CNS effects with symptoms of headache, drowsiness, stupor, dizziness and unconsciousness. In extreme cases, severe overexposure may be fatal.

- INGESTION -
Ingestion may cause gastrointestinal irritation, nausea, vomiting and diarrhea.

POTENTIAL CHRONIC HEALTH EFFECTS:
No further data known.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE:
No further data known.

CARCINOGENICITY:
This product is not listed as a known or suspected carcinogen by IARC, OSHA, or the NTP.

SECTION 4 - FIRST AID MEASURES

EYE CONTACT:
Upon direct eye contact, hold eyelids open and flush with a steady, gentle stream of water for at least 15 minutes. If irritation is due to exposure to mist or vapors, remove the individual to fresh air. If irritation persists, flush the eyes with clean water until the irritation subsides. If symptoms persist, contact a physician.

SKIN CONTACT:
Remove product from the skin by washing with a mild soap and water. Contaminated clothing should be removed to prevent prolonged exposure. If symptoms of exposure persist, contact a physician.

INHALATION:
Inhalation is not an expected route of exposure. If respiratory irritation or distress occurs, remove the employee to fresh air. Contact a physician or other medical professional if irritation or distress persists.

INGESTION:
If ingested, dilute stomach contents with two glasses of milk or water.

(NOTE: Do NOT give anything by mouth to an unconscious person.) DO NOT induce vomiting!! Aspiration of product into the lungs through vomiting may cause chemical pneumonitis which can be a dangerous condition. If vomiting occurs spontaneously, keep airway clear. If symptoms of ingestion persist, seek medical assistance.

NOTE TO PHYSICIAN:
No further data known.

SECTION 5 - FIRE FIGHTING MEASURES

FIRE AND EXPLOSIVE PROPERTIES:

Flashpoint	130.0	°F Tag Closed Cup
Flammability Limits	LEL -	-N/A
	UEL -	-N/A

EXTINGUISHING MEDIA:
In accordance with NFPA guidance, dry chemical, foam, or CO2 fire extinguishers are all acceptable. Note that while water fog extinguishers are also acceptable, do NOT apply a direct stream of water onto burning product because it may cause spreading and increase fire intensity.

UNUSUAL FIRE & EXPLOSION HAZARDS:
This material is combustible and may be ignited by heat, sparks, flames, or other sources of ignition. Vapors may travel a considerable distance where they can ignite, flashback, or explode.

FIRE-FIGHTING PROCEDURES AND EQUIPMENT:
Emergency responders in the danger area should wear bunker gear and self-contained breathing apparatus for fires beyond the incipient stage. See Section 8 of the MSDS for other PPE to be worn as conditions warrant.

SECTION 6 - ACCIDENTAL RELEASE MEASURES

CLEAN-UP MEASURES:
Important: As with any spill or leak, before responding ensure that you are familiar with the potential hazards and recommendations of the MSDS. Appropriate personal protective equipment must be worn. See Section 8 of this MSDS for PPE recommendations.

IMPORTANT: Vapors are heavier than air and may travel long distances along the ground and reach ingition sources. Eliminate fire hazard by extinguishing ignition sources (flames, pilot lights, spark sources) prior to responding and by using only explosion-proof spill response equipment. Vapors may collect in low areas, sewers, and confined spaces. Areas where vapors may collect should be ventilated properly prior to response.

If possible, safely contain the spill with dikes or other spill response equipment appropriate for releases of petroleum based materials. Large volumes may be transferred using explosion proof equipment to an appropriate container for proper disposal. Small volumes or residues may be soaked up with absorbents. Disposal of any spill response materials should meet appropriate waste regulations.

SECTION 7 - HANDLING AND STORAGE

HANDLING:

As with any industrial chemical, handle the product in a manner that minimizes exposure to practical levels. Prior to handling, consult Section 8 of this MSDS to evaluate personal protective equipment needs. Open containers slowly to relieve any pressure. Follow all other standard industrial hygiene practices.

Empty containers may contain product residue. All safety precautions taken when handling this product should also be taken when handling empty drums and containers. Keep containers closed when not in use.

WARNING! Bond and ground all equipment when transferring product from one vessel to another. Product may become electrostatically charged during mixing, filtering, or pumping at high flow rates. If a sufficient charge is generated, sparks can form that may ignite product vapors. Bonding and grounding is necessary to prevent static charge buildup.

Product residue in empty containers is combustible and may burn if exposed to an ignition source. Do NOT cut, grind, weld, or otherwise expose containers to heat or flame because residues may ignite or generate explosive vapors.

STORAGE:

Protect product quality by storing indoors and away from extreme temperatures. Close all containers when not in use.

SPECIAL COMMENTS:

No further data known.

SECTION 8 - EXPOSURE CONTROLS, PERSONAL PROTECTION

PERSONAL PROTECTIVE EQUIPMENT:

Selection of personal protective equipment should be based upon the anticipated exposure and made in accordance with OSHA's Personal Protective Equipment Standard found in 29 CFR 1910 Subpart I. The following information may be used to assist in PPE selection.

- EYE PROTECTION -

Wear eye protection appropriate to prevent eye exposure. Where

splashing is not likely, chemical safety glasses with side shields are recommended. Where splashing may occur, chemical goggles or full face shield is recommended.

- SKIN PROTECTION -
Gloves are recommended when skin contact is likely. Select chemical resistent gloves such as nitrile or rubber to protect against exposure.

Where splashing or soaking is likely, wear oil or chemical resistent clothing to prevent exposure.

- RESPIRATORY PROTECTION -
A respirator may be worn to reduce exposure to vapors, dust, or mist. Select a NIOSH/MSHA approved respirator appropriate for the type and physical character of the airborne material. A self-contained breathing apparatus is recommended in all situations where airborne contaminant concentration is unknown and may be above safe levels. Respirator use should comply with the OSHA Respirator Protection Standard found in 29 CFR 1910.134.

ENGINEERING CONTROLS:
Normal general ventilation is expected to be adequate. It is recommended that ventilation be designed in all instances to maintain airborne concentrations at lowest practical levels. Ventilation should at a minimum, prevent airborne concentrations from exceeding any exposure limits listed in Section 2 of this MSDS.

The user may wish to refer to 29 CFR 1919.1000(d)(2) and the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indicies" (Appendix C) for the determination of exposure limits of mixtures. An industrial hygienist or similar professional may be consulted to confirm that the calculated exposure limits apply.

SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES

Physical Appearance	Clear Yellow Color
Odor	Petroleum Solvent
Physical State	Liquid
Water Solubility	Insoluble
Specific Gravity	.760

SECTION 10 - STABILITY AND REACTIVITY

INCOMPATIBILITIES:
This product is incompatible with strong oxidizing agents.

DECOMPOSITION PRODUCTS MAY INCLUDE:

Thermal decomposition products are dependent on combustion conditions. A complex mixture of airborne solid, liquid, particulates and gasses may evolve when the material burns. Combustion byproducts may include:
oxides of carbon,
incompletely burned hydrocarbons as fumes and smoke.

CONDITIONS TO AVOID:
Avoid contact with incompatible materials and exposure to extreme temperatures.

POLYMERIZATION:
This product is not expected to polymerize.

STABILITY:
This product is stable.

SECTION 11 - TOXICOLOGICAL INFORMATION

EYE EFFECTS:
No further toxicological data known.

SKIN EFFECTS:
No further toxicological data known.

ORAL EFFECTS:
No further toxicological data known.

INHALATION EFFECTS:
No further toxicological data known.

OTHER:
No further data known.

SECTION 12 - ECOLOGICAL INFORMATION

ECOTOXICOLOGICAL INFORMATION:
This product has not been evaluated for ecotoxicity. As with any industrial chemical, exposure to the environment should be prevented and minimized wherever possible.

ENVIRONMENTAL FATE:
The degree of biodegradability and persistence of this product has not been determined.

SECTION 13 - DISPOSAL CONSIDERATIONS

WASTE DISPOSAL:

Ensure that collection, transport, treatment, and disposal of waste product, containers and rinsate complies with all applicable laws and regulations. Note that use, mixture, processing, or contamination of the product may cause the material to be classified as a hazardous waste. It is the responsibility of the product user or owner to determine at the time of disposal, whether the product is regulated as a hazardous waste.

SECTION 14 - TRANSPORT INFORMATION

DOT HAZARDOUS MATERIAL INFORMATION:

- Non-bulk (<119 gl.) domestic ground shipments: Not DOT regulated.
- Bulk domestic ground shipments: Petroleum Distillates, n.o.s., (Naphtha Solvent); Combustible Liquid; UN 1268; PG III.
- Shipments by Air, Water, or with an International Destination: Flammable Liquid, n.o.s. (Naphtha Solvent); 3 ; UN 1993; PG III.

* Not otherwise DOT regulated.

SECTION 15 - REGULATORY INFORMATION

FEDERAL REGULATIONS:

SARA 313:

This product contains NONE of the substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372.

CERCLA Reportable Quantity:

Any components listed below have been assigned a reportable quantity (RQ) by the Federal EPA. Releases of the product into the environment that exceed the RQ for a particular component must be reported to the National Response Center at 1-800-424-8802.

Component	RQ
* - * - * - * - * - * - * - * - * - * - * - * - * - * - *	

Toxic Substances Control Act:

The components of this product are listed on the TSCA Inventory.

Ozone Depleting Substances:

This product contains no ozone depleting substances as defined by the Clean Air Act.

STATE REGULATIONS:

No further data known.

SECTION 16 - OTHER INFORMATION

Prepared by . . . . . : Corporate Regulatory Compliance
Date of issue . . . . . : 11/01/2000

FUCHS LUBRICANTS CO.

PRODUCT NAME: ECOFORM SVO 95

Last Revision Date . . . . . : 09/28/1999
663493

NOTICE: This MSDS provides a good faith representation of information believed to be accurate as of the last revision date. This document does not create any express or implied product warranties. Since conditions of use are beyond the control of Fuchs Lubricants Co., all risks associated with product use are assumed by the user.

TUTCO INC. / 500 Gould Drive / Cookeville, Tennessee 38506

April 15, 2002

State of Tennessee
Dept. of Environment and Conservation
Division of Air Pollution Control
9th Floor, L&C Annex
401 Church Street
Nashville TN 37243-1531

71-0190
55446

Ladies and Gentlemen:

I'm writing this cover letter to explain why TUTCO Inc. is submitting another construction permit application. We were visited recently by Jeff Cales, Environmental Specialist, of the Regional Environmental Assistance Center in Cookeville, Tennessee. Following his visit, we submitted our last ten months of activity for VOC emissions. It appears that TUTCO Inc. will be on the borderline for annual emissions permitted by our present operating permit.

To allow for production growth at TUTCO Inc. and to avoid this borderline issue, we wanted to submit the enclosed application for another construction permit to increase our VOC emissions.

We were hoping your office would consider expediting the process of this construction permit so TUTCO Inc. could start reporting on the new permit guidelines. Thank you for your help in this matter.

Sincerely,

William Wiegand

William Wiegand
Manufacturing Engineering Manager

Enclosure

cc: Jeff Cales
Rick Lineberry

Telephone (931) 432-4141 Purchasing FAX (931) 432-5912 Sales FAX (931) 432-4140
Accounting FAX (931) 432-5665 Packaged Heat FAX (931) 432-4195