BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
PROPOSED SITE-SPECIFIC	)	R02-20
AIR POLLUTION REGULATIONS	)	(Site-Specific Rulemaking - Air)
APPLICABLE TO HORWEEN LEATHER	)	
COMPANY OF CHICAGO, ILLINOIS	)	
35 Ill. Adm. Code 211.6170	)	
	)	

NOTICE OF FILING

TO: Rachel L. Doctors, Assistant Counsel
IEPA, Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Linda Brand
DCCA
620 E. Adams Street
Springfield, IL 62701

Deborah Connelly
JCAR
70 Stratton Office Building
Springfield, IL 62706-4700

Matthew J. Dunn
Chief Environmental Bureau
Office of the Attorney General
188 W. Randolph St. 20th Floor
Chicago, IL 60601

PLEASE TAKE NOTICE today that I have filed with the Clerk of the Illinois Pollution Control Board **Testimony of Julie M. Christensen and Arnold Horween III,** a copy of which is herewith served upon you.

Respectfully submitted,

One of Attorneys for Petitioner

Dated: June 19, 2002

Roy M. Harsch
GARDNER, CARTON & DOUGLAS
321 North Clark Street - Suite 3400
Chicago, Illinois 60610-4795
(312) 644-3000

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
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PROPOSED SITE-SPECIFIC	)	R02-20
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	)	

TESTIMONY OF JULIE M. CHRISTENSEN
ON BEHALF OF HORWEEN LEATHER

My name is Julie M. Christensen. After six years of experience in a corporate regulatory affairs department and completing my BS Degree in Environmental Science from Roosevelt University, I was employed as the Director of Safety and Environmental Compliance at Horween Leather Company on August 10, 1998.

My responsibilities at Horween involve gathering and maintaining all data regarding environmental and safety issues, completing all regulatory compliance reports and permitting under the direction of Arnold Horween Jr. and Arnold Horween III.

As shoemakers in the U.S. have decreased, and tanneries in the U.S. have closed, Horween has continuously tried to expand the specialty leather production to be able to remain a viable business. Over two years ago, we began working on this rulemaking to enable us to pick up business from a closed tannery in Wisconsin. As a consequence of the very slow regulatory process, leather was produced overseas to replace this leather. This leather is not the same quality, but it will be acceptable to the majority of customers, and it is less expensive. So this market may no longer be open to us. We will only know when we actually produce the leather and try to sell it. Because of the nature of our business, it is more important now than ever to be able to respond quickly with samples and new leathers for customer's requests. Therefore, we are urgently requesting a broader description of specialty leather so we can respond quickly to meet the demands of customers and fill voids in the industry. A lengthy turnaround time is never acceptable for our customers; they will go elsewhere, generally, overseas.

As explained by Mr. Horween, we have attempted to obtain the approval of the Illinois Environmental Protection Agency (IEPA) to arrive at an agreeable change to the specialty leather exemptions originally enacted by the Pollution Control Board in PCB R93-14. We have had numerous meetings and telephone conversations, responded to a number of information requests and answered many questions that IEPA posed (Attachment 2 to Testimony). Having reached a point of impasse in terms of making additional progress, Horween elected to file the Site Specific Rule Petition earlier this year. The proposal was actually filed with the Board on February 19, 2002, containing a detailed discussion of Horween's operations including the circumstances that gave rise to the need for producing additional types of specialty leather. We

also provided 16 attachments to the Petition to support our request for relief. Basically, the agreement we reached with IEPA was embodied in our draft, with the understanding that U.S. Environmental Protection Agency (USEPA) told IEPA it was acceptable. The basis for this agreement was the application of a limitation derived by the State of Maine and approved by USEPA as RACT for Prime Tanning Company located in Berwick, Maine. We included the proposed limitations of 24 pounds of VOM per 1000 sq. ft. for water-resistant leather and 14 pounds per 1000 sq. ft. for non-water-resistant leather based on a 12-month rolling average. These limitations are consistent with our understanding of the Maine RACT determination for Prime Tanning Company. It is our understanding that this RACT limitation was established through the Title V permitting process. We have included as Attachment 10 to our Site Specific Rulemaking the Prime Tanning Company Part 70 Air Emission License or CAAPP Permit. Attachment 11 is the April 18, 2000 Federal Register document approving this Maine RACT limitation.

Following the filing of our Site Specific Petition in February, there has been a flurry of activity as the hearing date was established and drew near. We have had a series of discussions with IEPA and with representatives of Region 5 USEPA concerning the appropriate limitations. Also, complicating the situation, USEPA has adopted a National Emission Standards for Hazardous Air Pollutants (NESHAP) that applies to leather coating which I will discuss later.

As a result of this activity, it is our understanding that IEPA will today submit proposed revised Site-Specific Rulemaking language for consideration by the Board as an alternative to what we originally proposed. Horween had a limited opportunity to review this proposal. We generally find it to be acceptable with two major reservations. These two exceptions concern changes to the recordkeeping and reporting obligations and a requirement to utilize high volume low pressure (HVLP) spray guns.

I will first address the reporting and recordkeeping requirements that IEPA included in Section 218.929(d) of their Rule. Our differences of opinion concern the reference to the words "by batch" in subpart 1. We believe that the inclusion of this language would require a substantial modification to the recordkeeping and reporting procedures that Horween currently follows. On March 4, 1996, Horween submitted an amendment to its RACT Certification describing a more efficient method of recordkeeping and demonstrating compliance with 35 Ill. Admin. Code 218.926(b)2(B). A copy of this submittal is found as Attachment 1 to this Testimony. Horween has been using this recordkeeping process since 1996 with the Agency's full knowledge. This same recordkeeping process is found in our CAAPP Permit in Section 5.6 General Recordkeeping Requirements and 7.0 Unit Specific Conditions. It has therefore been approved by both IEPA and USEPA to demonstrate compliance with the existing RACT rules. As new regulations have been promulgated, the records have been expanded to meet the new standards, i.e., seasonal emissions of VOMs (ERMS) and HAP emissions (NESHAP). As in the past, the recordkeeping will be expanded again to document the leathers that are addressed in this Site Specific Rulemaking. I truly believe this is the most accurate and by far the most efficient method of recordkeeping to demonstrate compliance with all of the RACT rules.

Briefly, Horween's recordkeeping process involves inventory records and production records that are maintained in the specific departments, i.e., Finishing, Cordovan, Pasting, and Maintenance. These departments record their chemical usage and report this usage to the office on a weekly basis. This data is entered into the computer monthly for calculations of total VOM and HAP emissions. Because we do not have specific point emission sources (stacks) for measurement in the various departments, we assume all VOM and HAPs from the finishes are emitted to the atmosphere. The production records are also forwarded to the office on a weekly basis. The square footage of the side leather is determined by a three-year rolling average of leather measured in the Shipping Department. Calculations are then completed for square footage of the various leathers finished, categorized by the correct category of leathers, i.e., Specialty, Standard Non-Stain, Standard Stain, Water-resistant, or Nonwater-resistant leathers, and VOMs and HAPs per 1000 sq. ft. are extrapolated.

Recordkeeping for these new specialty leathers would be set up with their own category, i.e., Specialty II Leathers, further broken down into water-resistant and non-water-resistant leathers (as they are listed under NESHAP), and all finishes would be tracked separately and applied to the square footage of these leathers (Attachment 2).

Horween submitted comments to USEPA regarding the proposed NESHAP. One of our comments regarded the complexity of recordkeeping under the proposed rule. We requested simply adding the HAP information to our current recordkeeping. In the final rule, Section F, our concerns were addressed by "already maintained purchase and usage records are all that will be needed to demonstrate compliance." On March 13, 2002, I spoke with Bill Schrock, USEPA's technical person who developed the NESHAP, to confirm that our existing recordkeeping would be satisfactory to the USEPA. He reiterated that the way we document our finishes with inventory usage records and production records is fine. The recordkeeping shown in the NESHAP standard was meant only as an example. Furthermore, In Prime Tanning/s Air Emission License, the Recordkeeping/Reporting section describes the same basic process that we currently use.

In summary, we are in agreement with IEPA Section 218.929(d)(1) draft with the removal of the language "by batch" and would therefore ask the Board to delete these two words as unnecessary to assure compliance.

The second issue I want to address stemming from IEPA's proposal is the request by Region 5 USEPA that the relief for these two new specialty leathers be predicated on Horween's employing the use of HVLP spray guns.

During discussions with IEPA and USEPA, concerns were raised regarding HVLP spray guns for our spray finishing machines. After discussing this issue with many finish providers and tanners, we are all in agreement that these spray guns will not work for our leathers. Problems arise because there would be less atomization of the finishes and less penetration into the leather. The finishes would lay-up on the surface of the leather, and our facility does not have the space capacity for longer drying runs. The leather would stick together as it is stacked after spraying, and the finishes would be ruined on all of the leather. HVLP spray guns are generally

used for garment and upholstery leathers; not shoe leather. However, we are borrowing a spray gun to try our various finishes on our leather in our sample booth today, June 19, 2002. In addition, we have contacted the salesman that Gary Becksteadt, IEPA, suggested we contact for the new technology spray guns. However, as Mr. Becksteadt stated, these are not HVLP spray guns.

Our spray machines use Binks model 95 AR automatic air spray guns with ratchet needle adjustments. The two air compressors for the big spray machine and small spray machine are 100 psi and 115 psi respectively. The actual spraying pressure is adjusted to approximately 60 psi depending on the finish. Both our spray machines are set up with water curtains and electronic eyes to reduce the amount of finish overspray. Our aniline finishes are sprayed on with multiple, extremely light coats rather than high volume (HV) coats.

Horween is a very small tannery that finishes leathers on all the lines that are available. We only have two spray machines and we need to be able to spray all of our leathers on either of these machines. We cannot dedicate one entire spray machine to only these types of leather. Not to mention that the HVLP spray guns would only work on the stain coats which we already brush on in many cases. Spraying, even with HVLP spray guns, would produce more atomization and emissions than using our brush finishing machines and swabbing the stain coats.

Therefore, we request that IEPA Section 218.929(c)(4) regarding the HVLP spray guns be removed from the draft.

There are several other points that I would like to make regarding the proposed alternate Site-Specific Rulemaking language submitted by IEPA. In Section 218.929(c), IEPA proposes that Horween have standard operating and maintenance procedures or SOMPs in place. As we stated in our April 22, 2002, letter to Mr. Dick Forbes of IEPA, Horween has no objection to the inclusion of SOMPs in the Rulemaking although we feel that it is redundant as these would be required as part of the Title V Permit requirement. Horween has always had procedures in place to minimize the volatilization of solvents as set forth in Attachment 2 to the Testimony. It is our understanding that the SOMP provisions found at subparagraph (c) subparts 1, 2 and 3 do not require any additional steps beyond those currently in place at Horween.

The first date for compliance as far as recordkeeping with the NESHAP is February 28, 2005. Combining our various leathers, while adjusting our finishes, may enable Horween to meet the NESHAP regulations that are 5.6 pounds per 1000 sq. ft. for water-resistant leathers and 3.7 pounds per 1000 sq. ft. for non-water-resistant leathers, provided this Site Specific Rule change is adopted and USEPA modifies its reference to specialty leathers.

During 2001 our HAPs averaged 6.75 pounds per 1000 sq. ft. for water-resistant leathers and 4.39 pounds per 1000 sq. ft. for non-water-resistant leathers. In January through May of this year we are averaging 4.98 pounds per 1000 sq. ft. for water-resistant leathers and 2.34 pounds per 1000 sq. ft. for non-water-resistant leathers. As this shows, Horween is continuously adjusting finish components to try to reduce both VOM and HAP emissions, while maintaining our high standards of finished leather.

As an explanation of our limits, we are allowed the following VOM emissions in our Title V CAAPP Permit:

EMISSION SOURCE	VOM EMISSIONS
Specialty Leather	Not to exceed 38 lbs./1000 sq. ft.
Standard Stain	Not to exceed 10 tons per year.
Standard Non-Stain	Not to exceed 3.5 lbs./gallon as applied.
Specialty Leather, Standard Stain, Miscellaneous (including cleanup)	Not to exceed 8 lbs./hour from individual units.
Cordovan	Not to exceed 8 lbs./hour, 3 tons/year, and 1 ton/year/source.
Cordovan, Miscellaneous (excluding cleanup) and Pasting	Not to exceed 5 tons/year combined.
Pasting Room Dryer	Not to exceed 0.25 tons/year.
Source-Wide Emissions	Not to exceed 99.12 tons/year.

Through the ERMS program, the total baseline emissions for Horween are 28.1 tons per season or 281 Allotment Trading Units (ATUs). As you can see by our recent usage of ATUs, we will hopefully be able to sell or retire 300 ATUs this year:

YEAR	ATUs	ATUs TOTAL	ATUs USED	BALANCE	ATUs RETIRED	FINAL BALANCE
2000	281	281	-192	89	0	89
2001	281 + 89	370	-158	212	0	212
2002	281 + 212	493				

The last point that I want to address is the issue of NESHAP recently enacted by USEPA. The NESHAP was enacted on February 27, 2002, and is found at 40CFR Part 63. As previously stated, we worked closely with Bill Schrock of USEPA during the formulation of this standard. We supplied USEPA with a series of comments and answered a number of technical questions. USEPA's consultants, in fact, physically visited the Horween tannery. As a result of our involvement, USEPA has included recognition that Horween's operations are unique. Basically, USEPA has combined all of Horween's specialty coatings into the water-resistant category in order to provide Horween with a higher allowable HAP content for specialty coatings. Notwithstanding, this effort by USEPA, Horween was unable to comply. Accordingly, Horween filed a Petition for Review of the Leather NESHAP Standards to address the specialty leather issues and the limits assigned to water-resistant and non-water-resistant leathers. Our lawyers have entered into settlement discussions with USEPA, which resulted in USEPA petitioning the Appellate Court to stay filings in this proceeding while we attempt to resolve our differences. We are hopeful USEPA will agree to modify the NESHAP to refer to specialty leathers as regulated by the Pollution Control Board, including the two new categories of specialty leather we are seeking approval for in this proceeding, rather than referencing the 25 percent oils, fats and grease content as currently contained in the NESHAP. We are also hopeful USEPA will

determine to proceed with the delisting of ethylene glycol monobutyl ether acetate (EGBE) (CAS No. 112-07-2) which is the principal HAP solvent that subjects Horween to the NESHAP.

Horween has proven itself to be very proactive in trying to reduce and eliminate emissions of VOMs and HAPs. However, because this is a specialty job shop, we need to expand our definition of specialty leathers by adding this Site Specific Rulemaking. Through these proposed additional categories, Horween will have the ability to produce new leathers to meet customer demands, while complying with Federal and State Regulations.

Lynda Hinw Decek
03/6000EET

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WRITER'S DIRECT DIAL NUMBER

ROBERTA M. SAIELLI
(312) 245-8769

March 4, 1996

Mr. Bharat Mathur
Division of Air Pollution Control
Illinois Environmental Protection Agency
1340 North 9th Street
Springfield, Illinois 62702

Re: Recordkeeping for VOM Emissions

Dear Mr. Mathur:

Pursuant to 35 Ill. Admin. Code §218.991(b)(1), Horween Leather Company ("Horween") previously submitted its certification of compliance with RACT regulations pertaining to VOM emissions from its leather coating operations. Over the past year, Horween has kept records in accordance with that certification. In the course of keeping those records, Horween has developed a more efficient method of recordkeeping and demonstrating compliance with 35 Ill. Admin. Code §218.926(b)(2)(B) (Specialty Leather). Therefore, by this letter, Horween is amending its RACT Certification with respect to records required by 35 Ill. Admin. Code § 218.991(d)(2)(D).

Horween will demonstrate compliance with the limit set forth in Section 218.926(b)(2)(B) (38 lbVOM/1000 ft^2) and will calculate the area of specialty leather finished as described in this letter. Horween will calculate an average side size, based upon data gathered over the preceding five (5) years. The square footage measurements are made at the time of shipment, after trimming the leather, when Horween measures each side with an electronic measuring device. The average side size will be adjusted annually each January by recalculating the average based upon the immediately preceding five years of data.

Each month, Horween will count the number of specialty leather sides finished. Horween will multiply the number of specialty leather sides finished per month by the calculated average square footage to obtain the total square footage finished per month.

Sides at shipment are smaller than sides at the time finishing is completed because excess leather is trimmed from the sides after finishing and prior to shipment. Using the size of sides at

time of shipment to calculate the average side size will result in a conservative estimate of the pounds of VOM per 1000 square feet. In other words, because the square footage of sides actually finished is larger than the square footage of sides shipped, the pounds of VOM per 1000 square feet will be recorded as higher than it would be if the finished sides were individually measured. Thus, this method of demonstrating compliance will ensure that emissions of VOM containing material will remain well within the limit set in Section 218.926(b)(2)(B).

Finally, to demonstrate compliance, Horween will take the total pounds of VOM as applied to specialty leather per month and divide that by the total square footage calculated to determine compliance with the 38 lbVOM/1000 ft^2 limit. Horween will continue to keep the records of VOM usage as specified in its previously submitted RACT Certification.

Horween believes that this amendment of its RACT Certification will result in more efficient recordkeeping, while allowing Horween to continue to demonstrate compliance with the leather coating RACT rules.

Horween will also submit under separate cover, an Amendment to its Clean Air Act Permit Program permit application, setting forth this method of recordkeeping.

If you have any questions, please contact me.

Very truly yours,

Roberta M. Saielli/ac

Roberta M. Saielli

cc: Arnold Horween Jr.
Tom Culliton
Christopher Romaine
Roy M. Harsch

HORWEEN LEATHER COMPANY

TANNERS AND CURRIERS

2015 ELSTON AVENUE

CHICAGO, ILLINOIS 60614-3995

PHONE: 773/772-2028

FAX: 773/772-9235

April 22, 2002

Mr. Dick Forbes
Illinois Environmental Protection Agency
Air Quality Planning Section
PO Box 19276
Springfield, Illinois 62794-9276

Dear Mr. Forbes:

During the conference call on April 12, 2002, the Illinois Environmental Protection Agency ("Agency") requested Horween to respond in writing to points we raised relevant to the draft rule prepared by Ms. Doctors. This letter is written to provide the requested information.

A. Section 218.929(a)

As we discussed, only a portion of the new leather Horween will produce is of the hot stuffed category. The "Gentry" leather, not hot stuffed, is chrome tanned, bark/polymer retanned leather that is finished with coating materials containing water-emulsified materials using water-miscible solvent materials to protect the leather and pigmented coating. Again, I would like to stress that we need both the "*Cementable Shoe Leather*" and the "*Dress or Performance Shoe Leather*" categories of leather accepted. The Maeser Flexes can test only the water-resistant leather. The other leathers will be identified by: 1) finishing with water emulsified materials to meet a performance of soaking and ironing; 2) a fine, dressy finish; or 3) using a mass balance formula for addition of wax, grease, polymer, and oils.

Horween cannot use the proposed test method for hot stuffed leather. Horween adds a specific quantity of wet leather, with known moisture content, to the preheated mill and adds a specific quantity of wax, grease, polymer, and oils to be beaten into the leather. The retanned leather may or may not have additional wax, grease, polymer, and oils added by a subsequent hot roller. Horween does not have the ability to weigh the leather before and after the lubrication steps. Therefore, Horween proposes to continue to use the material balance approach of comparing the weight of leather on a dry-weight basis to the weight of wax, grease, polymer, and oils added.

Mass balance formula for wax, grease, polymers, and oils, added:

$12\% < P < 25\%$

Where:

$$P = W/L \times 100$$

P=Percent content of wax, grease, polymer, and oils
L=Dry weight of leather before addition of wax, grease, polymer, and oils
W=Weight of wax, grease, polymers, and oils in pounds added to leather

B. Section 218.929 (b) Testing of Leather:

As we explained, it is not physically possible to test the leather as water-resistant in the Color Department. The leather is still wet. Horween proposes that samples of the leather will be tested after it has been finished according to ASTM Standard D2099-00. To meet the definition of water-resistant, the results must be greater than or equal to 5,000 Maeser Flexes.

As a side issue, Horween explained that if a particular batch of water-resistant leather in fact failed this test, the batch would have to be recorded and the VOM applied to the nonwater-resistant accounting records.

In reviewing the Prime Tanning Company Air Emission License, waterproof leather is "*designated*" in the coloring room. This does not mean it is tested at this location. Our leather is "designated" in the Splitting Department by a sorter as to what quality and type of leather it should produce. I might add that our leather is measured after it has gone through all processing, drying, shrinking, finishing, and trimming, when it is ready to ship.

C. Section 218.929(c) Standard operating and maintenance procedures (SOMP)

Based upon our discussion, we understand that U.S. EPA would prefer to see a SOMP included in the rule. Horween has no objection to inclusion of a SOMP. Horween has always had procedures to minimize the volatilization of solvents. The plant's standard operating procedures include minimizing losses of VOMs by keeping containers closed during storage, when not adding or removing materials, and keeping coating containers securely closed during transport and use. Horween Leather utilizes electric eyes, spray guns and water curtains on our two spray machines to minimize VOM losses. These procedures serve two purposes: minimizing VOM emissions, and saving money. Solvent cleanup is kept at a minimum with the Miscellaneous Emission Units in the Title V Permit and handling of solvents is covered in our Fire Prevention Plan SS E1-02.

In order to use the high volume low-pressure (HVLP) spray guns, our complete spraying system would have to be changed, including different air compressors for each line. These spray guns would not work for all of our finishes and on all of our leathers. The finish would be too thick for some leathers and the HVLP spray guns would physically move the lightweight leathers.

D. Section 218.929(d)

Horween has no objection to incorporating the standard recordkeeping and compliance certification process into the rule. As we discussed, Horween has in place a system that it believes complies with recordkeeping requirements. To demonstrate compliance, additional new categories of leathers and finishes will be added as production begins using already maintained purchase and usage records (as accepted by the USEPA NESHAP Final Rule, 40 CFR 63, under F. RFA, p. 9161 in the ***Federal Register***). Horween will record the names of leathers and the products used to finish them will be designated by category. The Finishing Department inventories the product used and the leather produced during the month. This information is forwarded to the office.

The office has inventory books that are checked against purchase and usage records and the usage information is entered on a spreadsheet. The *HAPS and VOM Master* contains the product name; gallons used monthly, seasonally, and annually; multiplied by the density gives pounds of product used. This multiplied times the percent VOM in the product gives the pounds of VOM emitted monthly, seasonally and yearly. The "as applied" without water calculation for the products is only documented for the products used on Standard Non-Stain leathers. The specific products are used only on certain leathers and are categorized accordingly.

Currently there are 45 leathers that receive Standard Stain and/or Standard Non-Stain finishes, and 24 Specialty leathers. Information from the Finishing Department is entered into several spreadsheets (*HAPS and VOM Master*, *Leather Production*, *Specialty Leathers and VOMs per 1000 SF*, *Stain Coat Rolling Average*, and *Standard, Non-Stain Coatings*) to document compliance.

With adding very little additional information, the records have been changed to also provide documentation for NESHAP. The new categories of leathers can also be added to the current, approved recordkeeping documentation. I have attached a copy of these forms.

Horween believes that many of the changes/additions you are requesting is information that would best be contained in the Title V CAAPP Permit, versus listing them in this Petition.

I would hope that the Agency can complete its review of this with U.S. EPA and we can arrive at a mutually acceptable rule by the hearing scheduled for May 29, 2002.

If you have any further information requirements, please do not hesitate to contact me at (773) 772-2026, extension 19.

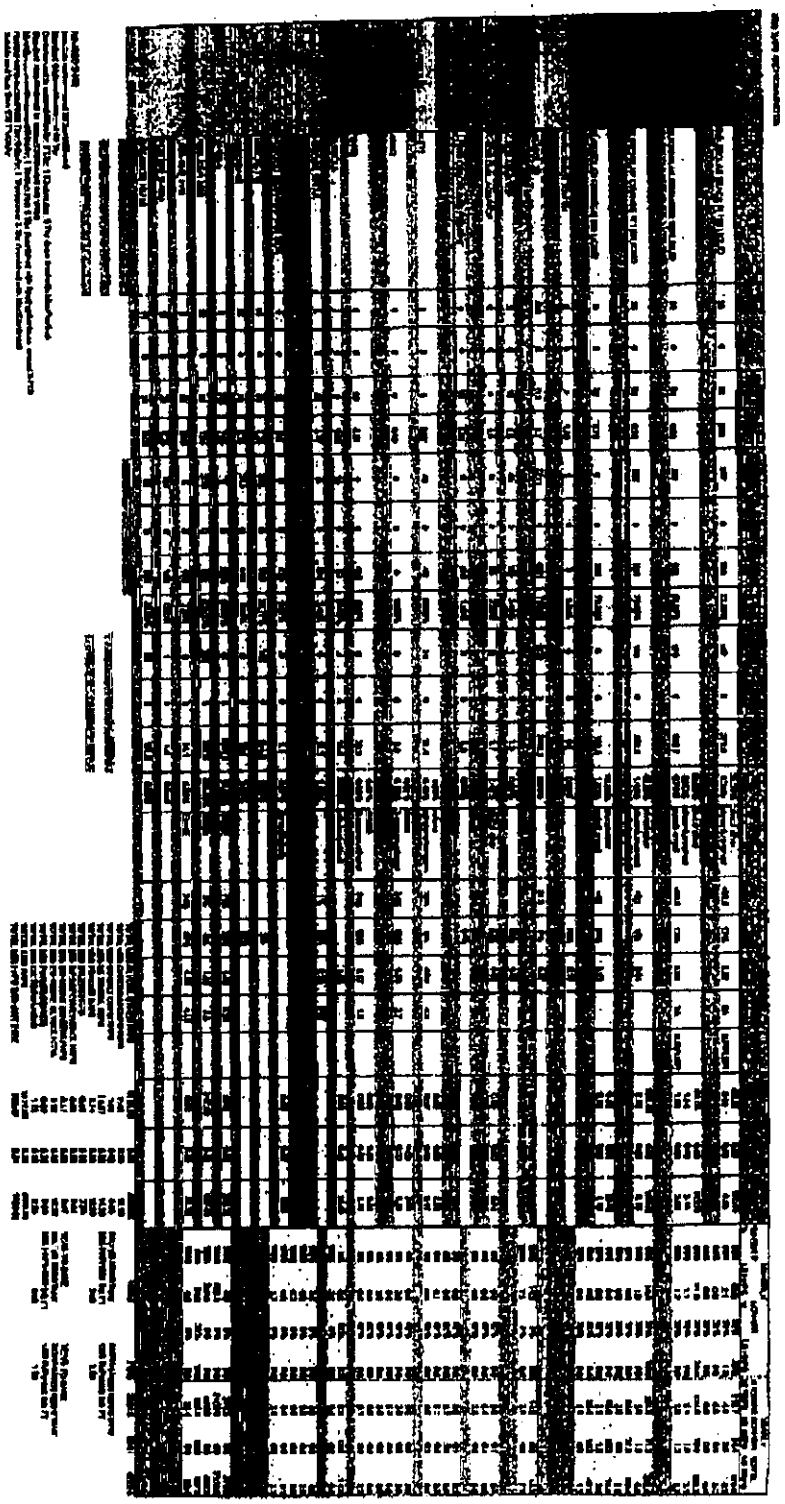
Sincerely,

Julie M. Christensen

Julie M. Christensen
Director of Safety and Environmental Compliance

Attachments

Copy: Rachel L. Doctors
Roy M. Harsch



LEATHER PRODUCTION

	SIDES FINISHED	SQ FT PER SIDE	TOTAL SQ FT	% WASHAB	LEATHERS STAND	LEATHERS SPEC	SQUARE FEET STAND	SQUARE FEET SPEC
WATER RESISTANT (6.5 lbs/1000 sq ft)								
Adirondack	0	19.491	0.0		STAND		0.0	
Austin	0	19.491	0.0		STAND		0.0	
Beaufort Chromexcel	[illegible]	19.491	1150.0			SPEC		1150.0
[illegible]	115	19.491	2241.5			SPEC		2241.5
[illegible]	325	19.491	[illegible]			SPEC		[illegible]
Chesapeake	0	19.491	0.0			SPEC		0.0
Chromexcel	4127	19.491	80439.4			SPEC		80439.4
Chromexcel HF	1274	12.4	15797.6			SPEC		15797.6
Chromexcel Strips	0	3.0	0.0			SPEC		0.0
Cordovan HS	6404	2.2	14088.8					14088.8
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
Diffused	30	19.491	584.7			SPEC		584.7
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
Hunterman	0	19.491	0.0			SPEC		0.0
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	0	19.491	0.0			SPEC		0.0
Mill Dyed [illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	12	19.491	[illegible]		STAND		[illegible]	
Official [illegible]	4272	19.491	[illegible]			SPEC		[illegible]
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	141	19.491	2748.2		STAND		2748.2	
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	[illegible]	19.491	3294.0			SPEC		3294.0
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible] HF	250	12.4	3100.0			SPEC		3100.0
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible]	0	19.491	0.0			SPEC		0.0
[illegible] HF	246	12.4	3087.8			SPEC		3087.8
[illegible]	93	19.491	1817.6		STAND		1817.6	
[illegible] PG CR	0	19.491	0.0			SPEC		0.0
SUB-TOTAL	[illegible]		[illegible]				[illegible]	[illegible]
WATER-RESISTANT							[illegible]	[illegible]
PERCENT OF TOTAL			[illegible]				[illegible] OF STAND	
NON-WATER RESISTANT (3.7 lbs/1000 sq ft)								
[illegible] HF	2671	12.4	33120.4		STAND		33120.4	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	21	19.491	409.3		STAND		409.3	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible] HF	400	12.4	4960.0		STAND		4960.0	
Deer Tanned	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	150	19.491	[illegible]		STAND		[illegible]	
[illegible]	[illegible]	19.491	[illegible]		STAND		[illegible]	
[illegible] HF	[illegible]	12.4	[illegible]		STAND		[illegible]	
[illegible]	[illegible]	19.491	[illegible]		STAND		[illegible]	
[illegible] HF	[illegible]	12.4	[illegible]		STAND		[illegible]	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible] HF	0	12.4	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	[illegible]	19.491	[illegible]		STAND		[illegible]	
[illegible] HF	[illegible]	12.4	[illegible]		STAND		[illegible]	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible] HF	0	12.4	0.0		STAND			
[illegible]	[illegible]	19.491	[illegible]		STAND		[illegible]	
[illegible] HF	[illegible]	12.4	4414.4		STAND		4414.4	
[illegible]	0	19.491	0.0		STAND		0.0	
[illegible]	40	19.491	[illegible]		STAND		[illegible]	
[illegible]	0	19.491	0.0		STAND		0.0	
SUB-TOTAL	[illegible]		[illegible]				[illegible]	
PERCENT OF TOTAL			[illegible]				[illegible] OF STAND	
TOTAL	[illegible]		[illegible]				[illegible]	[illegible]
	CXL		[illegible]					
	FOOTBALL		[illegible]					
	TOTAL		[illegible]					

SPECIALTY LEATHERS AND VOCS PER 1000 SF 2002

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTALS
FOOTAGE:													
CHROL	115961	102970	130129										348060
FOOTBALL	83256	73732	[illegible]										292967
TOTAL RACT	199217	176702	286818	0	0	0	0	0	0	0	0	0	662737
VOCS													
CHROL:													
EUKESOLAR BLACK	130	0	140										260
EUKESOLAR BLUE	0	0	0										0
EUKESOLAR BROWN	118	0	124										246
EUKESOLAR LEMON	23	0	4										23
EUKESOLAR ORANGE	123	0	145										268
EUKESOLAR RED	122	0	0										122
EUKESOLAR RUBINE	114	0	0										114
EUKESOLAR YELLOW	69	0	0										69
ASTACIN BOTTOM UH	0	0	0										0
ASTACIN FINISH UNA	0	0	0										0
27678	28	27	39										94
NEOMUL 1696	0	0	0										0
HODGCO 9117-A	5	12	0										17
HODGCO 3661	2	6	3										16
HODGCO 8809	0	0	0										0
HODGCO 886-C	1	0	4										5
MELIO 5-716	0	0	115										116
MELIO LV-03	3	7	9										19
BAYCIN 3630	0	0	68										65
W 888-A	1809	502	0										1895
REDUCER 3000-P	1310	748	748										2598
REDUCER 3000	230	138	248										638
UNITHANE 9107	121	82	81										284
UNITHANE 9111	0	34	0										34
UNITHANE MIX	0	0	0										0
ADDITIVE S-402A	0	0	1										1
ADDITIVE S-8	0	0	0										0
SUBTOTAL	3382	1571	1725	0	0	0	0	0	0	0	0	0	6678
FOOTBALL													
VITASOL	1258	868	1738										3780
TOTAL	4641	2440	3465	0	0	0	0	0	0	0	0	0	10444
VOCS/FOOT	0.0279	0.0138	0.0131	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0.0163
VOC lb/1000 SF	22.79	13.81	13.13	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	16.33

2002 STAIN COAT ROLLING AVERAGE

LEATHERS:	VOM'S BEGINNING OF PERIOD	ADD CURRENT MONTH	LESS PRIOR YEAR SAME MONTH	VOM'S END OF PERIOD
SNUFFED SUEDE	436	9	28	417
LATIGO	1179	104	22	1261
CHAMOIS	302	27	13	316
TOTAL VOM'S	1917	140	63	1994
TOTAL TONS	0.959	0.070	0.0315	0.997 (NOT TO EXCEED 10 TONS VOM/YEAR)

STANDARD, NON-STAIN COATINGS (EACH NOT TO EXCEED 3.5 LBS. VOM/GAL AS APPLIED)

	VOM'S
BRUSH	0
SPRAY	5
TOTAL VOMS	5

FUGITIVE/CLEANUP:

STEAMATE NA714	35
CITRU-SOLV	359
X-773	21
TOTAL VOM'S	415

SUM OF CLEANUP, CORDOVAN, PASTING (NOT TO EXCEED 5 TONS VOM/YEAR)

	VOMS	TONS
MONTHLY	[illegible]	0.4035
YEARLY	1458	0.729

CORDOVAN:

ETHANOL GRACOL B-190	370

TONS/YEAR (NOT TO EXCEED 3 TONS VOM/YEAR)

	TONS
MONTHLY	0.185
YEARLY	0.185

PASTING:

GLYCOLA	4

TONS/YEAR (NOT TO EXCEED 0.25 TONS VOM/YEAR)

	TONS
MONTHLY	0.002
YEARLY	0.007

VOM TOTAL (INCLUDING RACT):			
	MONTHLY	[illegible]	[illegible]
	YEARLY	[illegible]	[illegible]

	SIDES FINISHED	SQ FT PER SIDE	TOTAL SQ FT	% WR/N-WR	LEATHERS STAND	LEATHERS SPEC	SQUARE FEET STAND	SQUARE FEET SPEC
WATER RESISTANT (5.6 lbs/1000 sq ft)								
Adirondack	0	19.491	0.0		STAND		0.0	
Austin	0	19.491	0.0		STAND		0.0	
Beaufort Chromexcel	59	19.491	1150.0			SPEC		1150.0
Beaumont	115	19.491	2241.5			SPEC		2241.5
Buccaneer	321	19.491	6256.6			SPEC		6256.6
Chesapeake	0	19.491	0.0			SPEC		0.0
Chromexcel	4127	19.491	80439.4			SPEC		80439.4
Chromexcel HF	1274	12.4	15797.6			SPEC		15797.6
Chromexcel Strips	0	3.0	0.0			SPEC		0.0
Cordovan HB	6404	2.2	14088.8					14088.8
Cutwater	0	19.491	0.0		STAND		0.0	
Drifter	0	19.491	0.0		STAND		0.0	
Driftwood	30	19.491	584.7			SPEC		584.7
Everglades	0	19.491	0.0		STAND		0.0	
Hawkeye	0	19.491	0.0		STAND		0.0	
Huntsman	0	19.491	0.0			SPEC		0.0
Kudu	0	19.491	0.0			SPEC		0.0
Longitude	0	19.491	0.0			SPEC		0.0
Mill Dyed Navigator	0	19.491	0.0			SPEC		0.0
Navigator	0	19.491	0.0			SPEC		0.0
Oakbrook	12	19.491	233.9		STAND		233.9	
Official Football	4272	19.491	83265.6			SPEC		83265.6
Orion	0	19.491	0.0		STAND		0.0	
Plainsman	0	19.491	0.0			SPEC		0.0
Portsmouth	141	19.491	2748.2		STAND		2748.2	
Renegade	0	19.491	0.0			SPEC		0.0
Rover	0	19.491	0.0		STAND		0.0	
Ruffian	169	19.491	3294.0			SPEC		3294.0
Runabout	0	19.491	0.0		STAND		0.0	
Stampede	0	19.491	0.0			SPEC		0.0
Tempest	0	19.491	0.0			SPEC		0.0
Tempest HF	250	12.4	3100.0			SPEC		3100.0
Tundra	0	19.491	0.0		STAND		0.0	
Typhoon	0	19.491	0.0			SPEC		0.0
Voyager	0	19.491	0.0			SPEC		0.0
Wax Flesh HF	249	12.4	3087.6			SPEC		3087.6
Windy City	83	19.491	1617.8		STAND		1617.8	
Wooley FG CXL	0	19.491	0.0			SPEC		0.0
SUB-TOTAL	17506		217905.5				4599.9	213305.7
WATER-RESISTANT							2%	98%
ERCENT OF TOTAL			68%				4%	OF STAND
NON-WATER RESISTANT (3.7 lbs/1000 sq ft)								
98 Series HF	2671	12.4	33120.4		STAND		33120.4	
Amazon	0	19.491	0.0		STAND		0.0	
Basketball	0	19.491	0.0		STAND		0.0	
Bayside	0	19.491	0.0		STAND		0.0	
Buckaroo	0	19.491	0.0		STAND		0.0	
Calico	21	19.491	409.3		STAND		409.3	
Chamois	0	19.491	0.0		STAND		0.0	
Chrome Pac	0	19.491	0.0		STAND		0.0	
Crunch HF	400	12.4	4960.0		STAND		4960.0	
Deer Tanned	0	19.491	0.0		STAND		0.0	
Drylands	0	19.491	0.0		STAND		0.0	
Football	0	19.491	0.0		STAND		0.0	
Gentry	0	19.491	0.0		STAND		0.0	
Glove	150	19.491	2923.7		STAND		2923.7	
Kahuna Citation	25	19.491	487.3		STAND		487.3	
Kahuna HF	876	12.4	10862.4		STAND		10862.4	
Latigo	432	19.491	8420.1		STAND		8420.1	
Lining HF	1986	12.4	24626.4		STAND		24626.4	
Mirage	0	19.491	0.0		STAND		0.0	
Mirage HF	0	12.4	0.0		STAND		0.0	
Mooselan	0	19.491	0.0		STAND		0.0	
Muskeg	0	19.491	0.0		STAND		0.0	
Oakfield	0	19.491	0.0		STAND		0.0	
Outrider	0	19.491	0.0		STAND		0.0	
Outrigger	80	19.491	1559.3		STAND		1559.3	
Plunge Kahuna HF	502	12.4	6224.8		STAND		6224.8	
Rebellion	0	19.491	0.0		STAND		0.0	
Riverbend	0	19.491	0.0		STAND		0.0	
Shanktan HF	0	12.4	0.0		STAND			
Snuffed Suede	220	19.491	4288.0		STAND		4288.0	
Superior HF	356	12.4	4414.4		STAND		4414.4	
Tracker	0	19.491	0.0		STAND		0.0	
Walkabout	40	19.491	779.6		STAND		779.6	
Wearproof	0	19.491	0.0		STAND		0.0	
SUB-TOTAL	7759		103075.7				103075.7	
ERCENT OF TOTAL			32%				96%	OF STAND
TOTAL	25265		320981.2				107675.6	213305.7
	CXL		115951.3					
	FOOTBALL		83265.6					
	TOTAL		199216.9					

2002 HAPS AND VOM MASTER

	PRODUCT NAME	MONTHLY GAL'S	SEASONAL GAL'S	YEARLY GAL'S	DENSITY LB/GAL	MONTHLY LBS	SEASONAL LBS	YEARLY LBS	% VOM	TOTAL LB VOM PER MONTH	TOTAL LB VOM PER SEASON	TOTAL LB VOM PER YEAR	% HAP		% SOLIDS	% WATER	VOM LEGAL WITH WATER	VOM LEGAL WITHOUT WATER	METHOD USED	TOTAL LB HAPS PER MONTH	TOTAL LB HAPS PER SEASON	TOTAL LB HAPS PER YEAR	MONTHLY WATER R %	MONTHLY LB HAPS	MONTHLY NON-WR %	MONTHLY LB HAPS	YEARLY WATER R LB HAPS	YEARLY NON-WR LB HAPS	YEARLY TOTAL LB HAPS
													32.50%	glycol ether						83.66	0.00	170.10	68%	56.9	32%	26.8	115.7	54.4	170.1
	EUKESOLAR BLACK R 150 LIQUID	30	0	61	8.58	257	0	523	72.50%	187	0	379.5	1.20%	chromium cmpd	<26.5	12%	6.22	NA	SUPPLIER	3.09	0.00	6.20	68%	2.1	32%	1.0	4.3	2.0	6.3
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	40.40%	glycol ether	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00	0.00	0.00	68%	0.0	32%	0.0	0.0	0.0	0.0
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	97.73%	0	0	8.6	0.27%	chromium cmpd	2%	3%	2.31	[illegible]	[illegible]	0.00	0.00	0.00	68%	0.0	32%	0.0	0.0	0.0	0.0
													35.00%	glycol ether						90.09	0.00	183.18	68%	61.3	32%	28.8	124.6	58.6	183.2
													0.60%	chromium cmpd						1.54	0.00	3.14	68%	1.1	32%	0.5	2.1	1.0	3.1
	EUKESOLAR BROWN R 150 LIQUID	30	0	61	8.58	257	0	523	69.50%	178	0	363.7	0.70%	cobalt cmpd	<29.5	13%	5.96	NA	SUPPLIER	1.80	0.00	3.66	68%	1.2	32%	0.6	2.5	1.2	3.7
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	53.00%	[illegible]	0	37.2	0.00%		10%	10%	4.66	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
													42.50%	glycol ether						109.40	0.00	222.44	68%	74.4	32%	35.0	151.3	71.2	222.4
	EUKESOLAR ORANGE R 150 LIQUID	30	0	61	8.56	257	0	523	75.00%	193	0	392.5	1.10%	chromium cmpd	<25	9%	6.44			2.83	0.00	5.76	68%	1.9	32%	0.9	3.9	1.8	5.6
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	37.00%	glycol ether	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00	0.00	98.41	68%	0.0	32%	0.0	66.9	31.5	98.4
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	74.00%	0	0	196.4	1.10%	chromium cmpd	<25	10%	6.36	[illegible]	[illegible]	0.00	0.00	2.03	68%	0.0	32%	0.0	2.0	0.9	2.9
													30.00%	glycol ether						0.00	0.00	78.75	68%	0.0	32%	0.0	53.6	25.2	78.8
	EUKESOLAR RUBINE B 150 LIQUID	0	0	30	8.75	0	0	283	70.00%	0	0	163.8	1.20%	cobalt cmpd	<18	14%	8.13			0.00	0.00	3.15	68%	0.0	32%	0.0	2.1	1.0	3.2
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	37.00%	glycol ether	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00	0.00	47.42	68%	0.0	32%	0.0	32.4	15.2	47.6
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	76.00%	[illegible]	0	95.2	1.20%	cobalt cmpd	<25	10%	6.36	[illegible]	[illegible]	0.00	0.00	1.56	68%	0.0	32%	0.0	1.1	0.5	1.5
	ASTACIN BOTTOM UH	0	0	0	8.33	0	0	0	1.00%	0	0	0.0	0.00%			78%	0.15												
SPECIALTY PRIME	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.0	0.00%		[illegible]	67%	0.26	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	84.6	0.00%		96%	63%	0.14	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
BLUMBERG	VITASOL 25	330	0	715	6.7	2211	0	4791	78.40%	1736	0	3765.3	0.00%		21%	0%	5.27												
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	3.00%	methanol	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	14.27	0.00	14.27	100%	14.3	0%	0.0	14.3	0.0	14.3
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	100.00%	[illegible]	[illegible]	375.7	1.50%	hexane	[illegible]	[illegible]	6.83	[illegible]	[illegible]	7.14	0.00	7.14	100%	7.1	0%	0.0	7.1	0.0	7.1
	K-4024 AQUATOP	6	0	15	8.6	43	0	129	3.00%	1	0	3.9	0.00%			80%	0.26												
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	K-4028 DULL AQUATOP	0	0	6	8.8	0	0	53	7.06%	0	0	3.7	1.40%	glycol ether		62%	0.82			0.00	0.00	0.74	8%	0.0	92%	0.0	0.0	0.7	0.7
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	2.50%	hexane	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00	0.00	9.80	8%	0.0	92%	0.0	0.4	9.4	9.8
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	8.00%	[illegible]	0	34.9	1.80%	xylene	20%	64%	1.20	3.9	[illegible]	0.00	0.00	6.82	8%	0.0	92%	0.0	0.3	6.5	6.8
	J-737R COLORLESS PIGMENT	0	0	50	8.38	0	0	470	1.40%	0	0	6.6	0.00%			84%													
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.01%	EGBE	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00	0.00	0.00	8%	0.0	92%	0.0	0.0	0.1	0.1
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	30.00%	[illegible]	[illegible]	66.7	0.73%	2-propoxyethanol	34%	60%	0.80	2.8	[illegible]	0.00	0.00	6.20	8%	0.0	92%	0.0	0.3	5.9	6.3
													1.60%	xylene						0.69	0.00	0.69	8%	0.1	92%	0.6	0.1	0.6	0.7
MISCELLANEOUS	X-773	5	0	5	8.57	43	0	43	50.00%	21	0	21.4	0.40%	ethylene benzene	50%	0%	4.29	4.3		0.17	0.00	0.17	8%	0.0	92%	0.2	0.0	0.2	0.2
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
													0.01%	EGBE						0.00	0.00	0.00	8%	0.0	92%	0.0	0.0	0.0	0.0
	40252	0	0	0	8.63	0	0	0	10.00%	0	0	0.0	0.73%	2-propoxyethanol	24%	66%	0.88	2.7		0.00	0.00	0.00	8%	0.0	92%	0.0	0.0	0.0	0.0
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.01%	methanol	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.00	0.00	0.02	8%	0.0	92%	0.0	0.0	0.0	0.0
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	320	1.50%	0	0	2.4	0.01%	hexane	9%	81%	0.00	0.00	[illegible]	0.00	0.00	0.02	8%	0.0	92%	0.0	0.0	0.0	0.0
													0.01%	EGBE						0.00	0.00	0.04	8%	0.0	92%	0.0	0.0	0.0	0.0
	33435	0	0	50	8.51	0	0	426	9.00%	0	0	38.3	0.83%	2-propoxyethanol	34%	58%	0.77	1.8		0.00	0.00	2.66	8%	0.0	92%	0.0	0.1	2.6	2.7
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0	21.8	0.00%	[illegible]	27%	70%	0.36	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	GLYCOLA	2	0	8	9.00	18	0	72	20.00%	4	0	14.4	20.00%	ethylene glycol			1.80			3.60	0.00	14.40	8%	0.3	92%	3.3	0.9	13.5	14.4
CLARIANT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1.00%	[illegible]	0	0.4	1.00%	glycol ether	[illegible]	[illegible]	0.09	[illegible]	[illegible]	0.18	0.00	0.44	100%	0.2	0%	0.0	0.4	0.0	0.4
	HODGCO 3717-A	0	0	56	8.17	0	0	474	3.45%	0	0	16.3	0.00%		1%	60%	0.26	0.87											
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.70%	ethylene glycol	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1.60	0.00	4.86	100%	1.6	0%	0.0	4.9	0.0	4.9
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.40%	glycol ether	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.91	0.00	2.77	100%	0.9	0%	0.0	2.8	0.0	2.8
SPECIALTY	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1.50%	[illegible]	0	10.5	0.10%	ethyl acrylate	0%	92%	0.78	0.73	[illegible]	0.23	0.00	0.69	100%	0.2	0%	0.0	0.7	0.0	0.7
	HODGCO 5508 WTRPROF BDR	0	0	15	8.5	0	0	128	0.07%	0	0	0.1	0.07%	formaldehyde						0.00	0.00	0.09	100%	0.0	0%	0.0	0.1	0.0	0.1
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	10.90%	diethanolamine	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1.73	0.00	2.06	100%	1.7	0%	0.0	2.1	0.0	2.1
	MELIO E-710	53	0	53	7.28	385	0	385	29.77%	115	0	114.5	0.00%			2%													
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	MELIO LV-03	26	0	79	8.18	213	0	646	2.80%	6	0	18.1	0.00%			88%													
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	10.00%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
UNION	W-480-A	0	0	330	7.80	0	0	2508	60.00%	0	0	1504.8	15.00%	EGBE	11%	23%	4.56	6.31		0.00	0.00	376.20	100%	0.0	0%	0.0	376.2	0.0	376.2
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	2.2000.7	31.43%	EGBE	0%	[illegible]	3.40	[illegible]	[illegible]	560.08	0.00	2100.31	100%	560.1	0%	0.0	2100.3	0.0	2100.3
	REDUCER 3000	33	0	85	7.50	248	0	638	100.00%	248	0	637.5	100.00%	EGBE	0%	0%	7.50	7.5		247.50	0.00	637.50	100%	247.5	0%	0.0	637.5	0.0	637.5
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	3323.0	5.00%	glycol ether	20%	[illegible]	[illegible]	[illegible]	[illegible]	46.75	0.00	187.00	68%	31.8	32%	15.0	127.2	60.0	187.0
	UNITHANE 8111	0	0	55	8.50	0	0	468	7.29%	0	0	34.1	5.00%	EGBE	24%	30%	0.62	4.12		0.00	0.00	23.38	100%	0.0	0%	0.0	23.4	0.0	23.4
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.0	0.00%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	ADDITIVE S-402A	13	0	23	8.25	107	0	190	0.80%	1	0	1.5	0.00%																
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	30.00%	[illegible]	[illegible]	[illegible]	0.00%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
BETZDEARBORN	STEAMATE NA710	11	0	36	8.00	88	0	304	40.00%	35	0	121.6	0.00%																
UNISOURCE MISCELLANEOUS	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	100.00%	[illegible]	[illegible]	624.6	0.00%	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	TOTAL LBS [illegible]					12210	0	30798												1138.56	0.00	4128.98		1084.6		112.8	3861.3	364.1	4225.4
	TOTAL [illegible]									4415	0	12002.6																	
	TOTAL [illegible]									2.2	0	6.3																	

	HAPS PER MONTH	HAPS PER SEASON	HAPS PER YEAR
TOTAL LBS GLYCOL ETHER HAPS	1138.56	0.00	4128.98
TOTAL LBS CHROMIUM CMPD HAPS	7.48	0.00	18.10
TOTAL LBS COBALT CMPD HAPS	1.80	0.00	8.38
TOTAL LBS METHANOL HAPS	14.27	0.00	14.30
TOTAL LBS HEXONE HAPS	7.14	0.00	16.98
TOTAL LBS XYLENE HAPS	0.69	0.00	7.50
TOTAL LBS 2-PROPOXYETHANOL HAPS	0.00	0.00	8.94
TOTAL LBS ETHYLENE BENZENE HAPS	0.17	0.00	0.17
TOTAL LBS ETHYLENE GLYCOL HAPS	5.20	0.00	19.25
TOTAL LBS FORMALDEHYDE	0.00	0.00	0.09
TOTAL LBS DIETHANOLAMINE	1.73	0.00	2.06
TOTAL LBS HAPS	1177.02	0.01	4224.71
TOTAL LBS HAPS WITHOUT EGBE	369.67	0.01	1088.06

WATER RESISTANT	NON-WATER RESISTANT
LBS HAP/1000 SQ FT	LBS HAP/1000 SQ FT
3.80	2.70

YEAR-TO-DATE	YEAR-TO-DATE
WATER RESISTANT	NON-WATER RESISTANT
LBS HAPS/1000 SQ FT	LBS HAP/1000 SQ FT
5.80	1.70

REVISED 3/4/02

Specialty not to exceed 38 lbs/1000 sq ft

Standard Stain not to exceed 10 T/yr

Cordovan not to exceed 8 lbs/hr; 3 T/hr; 1 T/yr/source; 5 T/yr (combined with Misc/Pasting)

Standard Non-Stain not to exceed 3.5 lbs/gal w/o water

Miscellaneous not to exceed 6 lbs/hr; 1 T/yr/source; 5 T/yr (combined with Pasting/Cordovan, except X-773)

Pasting not to exceed 0.25 T/yr; 8 lbs/hr; 1 T/yr/source, 5 T/yr (combined with Misc/Cordovan)

Total to emit less than 100 T VOM/yr

SPECIALTY LEATHERS AND VOM'S PER 1000 SF 2002

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTALS
FOOTAGE:													
CHRXL	115951	102870	130129										348950
FOOTBALL	83266	73832	133689										290787
TOTAL RACT	199217	176702	263818	0	0	0	0	0	0	0	0	0	639737
VOC'S													
CHRXL:													
EUKESOLAR BLACK	120	0	140										260
EUKESOLAR BLUE	0	0	0										0
EUKESOLAR BROWN	115	0	134										249
EUKESOLAR LEMON	23	0	0										23
EUKESOLAR ORANGE	123	0	145										268
EUKESOLAR RED	122	0	0										122
EUKESOLAR RUBINE	114	0	0										114
EUKESOLAR YELLOW	59	0	0										59
ASTACIN BOTTOM UH	0	0	0										0
ASTACIN FINISH UNA	0	0	0										0
27876	28	21	35										84
NEOMUL 1525	0	0	0										0
HODGCO 3717-A	5	12	0										17
HODGCO 3831	2	5	3										10
HODGCO 5509	0	0	0										0
HODGCO 593-C	1	0	4										5
MELIO E-710	0	0	115										115
MELIO LV-03	3	9	6										18
BAVON 3830	0	0	65										65
W-460-A	1003	502	0										1505
REDUCER 3000-P	1310	748	748										2806
REDUCER 3009	233	158	248										639
UNITHANE 9107	121	82	81										284
UNITHANE 9111	0	34	0										34
UNITHANE ANX	0	0	0										0
ADDITIVE S-402A	0	0	1										1
ADDITIVE S-3	0	0	0										0
SUBTOTAL	3382	1571	1725	0	0	0	0	0	0	0	0	0	6678
FOOTBALL													
VITASOL	1159	869	1738										3766
TOTAL	4541	2440	3463	0	0	0	0	0	0	0	0	0	10444
VOM'S/FOOT	0.0228	0.0138	0.0131	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0.0163
VOM'S/1000 SF	22.79	13.81	13.13	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	16.33

2002 STAIN COAT ROLLING AVERAGE

LEATHERS:	VOM'S BEGINNING OF PERIOD	ADD CURRENT MONTH	LESS PRIOR YEAR SAME MONTH	VOM'S END OF PERIOD	
SNUFFED SUEDE	436	9	28	417	
LATIGO	1179	104	22	1261	
CHAMOIS	302	27	13	316	
TOTAL VOM'S	1917	140	63	1994	
TOTAL TONS	0.959	0.070	0.0315	0.997	(NOT TO EXCEED 10 TONS VOM/YEAR)

STANDARD, NON-STAIN COATINGS (EACH NOT TO EXCEED 3.5 LBS. VOM/GAL AS APPLIED)

	VOM'S
BRUSH	0
SPRAY	5
TOTAL VOMS	5

FUGITIVE/CLEANUP:

STEAMATE NA716	35
CITRU-SOLV	369
X-773	21
TOTAL VOM'S	425

SUM OF CLEANUP, CORDOVAN, PASTING (NOT TO EXCEED 5 TONS VOM/YEAR)

	VOM	TONS
MONTHLY	805	0.4025
YEARLY	1458	0.729

CORDOVAN:

ETHANOL GRACOL B-190	376

TONS/YEAR (NOT TO EXCEED 3 TONS VOM/YEAR

	TONS
MONTHLY	0.188
YEARLY	0.188

PASTING:

GLYCOLA	4

TONS/YEAR (NOT TO EXCEED 0.25 TONS VOM/YEAR)

	TONS
MONTHLY	0.002
YEARLY	0.007

VOM TOTAL (INCLUDING RACT):	MONTHLY	4413		2.207
	YEARLY	12693		6.347