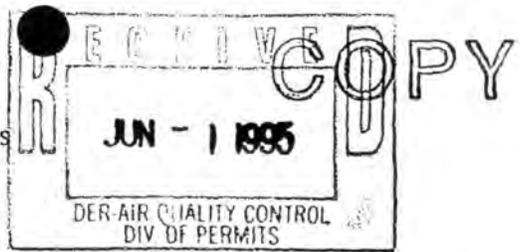


COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
SOUTHCENTRAL REGION - FIELD OPERATIONS  
AIR QUALITY CONTROL PROGRAM

OPERATING PERMIT



In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department hereby issues this permit for the operation of the air contamination source described below.

Permit No: 34-2001 Source & Air  
Cleaning Device: Kitchen and Bath Cabinet

Owner: Triangle Pacific Corp. Manufacturing Facility  
16803 Dallas Parkway (See Attached)  
Dallas, TX 75428

Attention: Mr. Gary Raven Location: Thompsontown Facility  
Director Environmental Affairs Delaware Township  
Juniata County

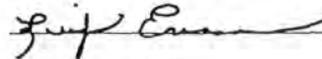
This permit is subject to the following conditions:

1. That the source and any associated air cleaning devices are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of the Reasonably Available Control Technology (RACT) plan;
  - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

4. See Attached.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: MAY 31 1995

  
Program Manager

Southcentral Region 34-2001  
EPA, Region III  
Permits

PERMIT NO. 34-2001

TRIANGLE PACIFIC CORP.

Source, Continued

The kitchen and bath cabinet manufacturing facility consists of the following:

Spray Line - This line consists of a preheat oven, four spray booths, a curing oven and an offline spray booth. Manually operated air assisted airless spray guns are used to apply the individual surface coatings.

Rollcoat/UV Line - This line consists of the following sublines:

Flat Stock Line - This subline consists of six application stations, a conventional curing oven plus several UV lamp ovens. Individual surface coatings are automatically applied using rollcoaters.

Interior (Single) Edge Line - This subline consists of three application stations plus several infrared and UV lamp ovens. Individual surface coatings are automatically applied using rollcoaters.

Exterior Double Edge Line - This subline consists of four application stations plus several infrared and UV lamp ovens. Individual surface coatings are automatically applied using rollcoaters.

In addition, a small amount of surface coatings are manually applied offline using brushes or rollers.

Conditions, Continued

4. This Operating Permit is for the incorporation of the Department's VOC Reasonably Available Control Technology (RACT) requirements (25 Pa. Code, §§129.91 through 129.95).
5. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes this Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced and approved by the U.S. Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by EPA upon its approval as a revision to the SIP.
6. Total Annual facility VOC emissions shall not exceed 250 tons. Compliance with this limit shall be based on the current 12-month running total.
7. Coatings utilized in the kitchen and bath cabinet surface coating operations are subject to the following VOC content limits. These limits are based on an as applied basis.
  - a. Topcoats - 0.8 lb VOC/lb solids
  - b. Sealers - 1.9 lb VOC/lb solids
  - c. Groundcoats - 1.1 lb VOC/lb solids
  - d. Enamels - 1.5 lb VOC/lb solids

Conditions, Continued

8. Records shall be maintained in accordance with 25 Pa. Code, §129.95 requirements.
9. An annual VOC emission report shall be submitted to the Harrisburg District Supervisor. The report for January 1 through December 31 is due no later than March 1 of the following year for each operating year authorized by the Operating Permit or its renewal. Each report shall include the following information:
  - a. Line designation (Spray or UV/Rollcoat)
  - b. Coating identification
  - c. Coating use (e.g., sealer)
  - d. Lb VOC per lb solid as applied
  - e. Lb VOC per gallon of coating (minus water) as applied
  - f. Coating density, lb/gal
  - g. Solvent density, lb/gal
  - h. Percent solvent (by volume) - (minus EPA exempted solvents)
  - i. Percent solids (by volume)
  - j. Percent solids (by weight)
  - k. Percent water (by volume)
  - l. Monthly totals, in gallons, of each coating used (plus water)
  - m. Monthly totals, in gallons, of each coating used (minus water)
  - n. Type, VOC content and monthly totals of cleanup solvent utilized
  - o. Monthly facility VOC emissions
10. Should credits be desired for those waste coatings or solvents sent off-site for either recycling or incineration at a legally permitted facility, the following information will be required:
  - a. the quantities being disposed of
  - b. the VOC content of the waste coatings or solvents being disposed of
  - c. documentation to verify the above
11. Any new coating or any compositional changes in an existing coating shall be reported to the Harrisburg District Supervisor prior to its use. Information to be reported shall include Items 9.b. through and including 9.k.
12. Within sixty (60) days of issuance of this Operating Permit, Triangle Pacific shall develop and submit to the Department a training program for all new and existing personnel involved in finishing and cleanup operations. The training program shall be designed to ensure that all VOC emission sources are operated and maintained in accordance with good air pollution control practices. At a minimum the training program shall include the following information:
  - a. A list of all personnel by name and job description that are required to be trained.

PERMIT NO. 34-2001

TRIANGLE PACIFIC CORP.

Conditions, Continued

- b. An outline of the subjects to be covered in the initial and the annual refresher training for each person or group of personnel.
- c. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleanup procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray plus appropriate management of cleanup wastes.
- d. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

Implementation of the training program shall occur within one hundred twenty (120) days of issuance of this Operating Permit.

- 13. Triangle Pacific shall prepare and maintain a written leak inspection and maintenance plan that specifies:
  - a. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply finishing materials or organic solvents.
  - b. An inspection schedule.
  - c. Methods for documenting the date and results of each inspection and any repairs that were made.
  - d. The time frame between identifying a leak and making the repair which adheres to the following schedule:
    - (1) A first attempt at repair shall be made no later than five (5) working days after the leak is detected; and
    - (2) Final repairs shall be made within fifteen (15) working days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months.