



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: March 4, 2020

Effective Date: March 4, 2020

Expiration Date: ~~September 4, 2024~~

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 67-05014C

Federal Tax Id - Plant Code: 23-2316195-1

Owner Information

Name: YORK GROUP INC  
Mailing Address: 2880 BLACK BRIDGE RD  
YORK, PA 17406-9703

Plant Information

Plant: YORK GROUP INC/BLACK BRIDGE RD  
Location: 67 York County 67939 Manchester Township  
SIC Code: 3995 Manufacturing - Burial Caskets

Responsible Official

Name: YURIJ F WOWCZUK  
Title: HEAD GLOBAL PROD&TECH  
Phone (412) 442 - 8279

Plan Approval Contact Person

Name: DAVID J ROBINSON  
Title: SR EHS MANAGER  
Phone: (717) 580 - 5302

[Signature]

*William R. Weaver*

WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

Pages 2-33 fully redacted

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: G005B

Group Description: RACT 1 (REVISED)

Sources included in this group

**RACT 2 and revised RACT 1 SIP Provisions  
from Plan Approval No. 67-05014C issued  
03/04/20 (pages 34-43 of permit)**

ID	Name
200	CUSTOM SEALER SPRAY BOOTH
205	CUSTOM FILL AND STAIN SPRAY BOOTH
220	SEALER C SPRAY BOOTH
225	SEALER A SPRAY BOOTH
230	TOPCOAT A SPRAY BOOTH
240	TOPCOAT B SPRAY BOOTH
260	TOPCOAT C SPRAY BOOTH
270	WIPING STAIN SPRAY BOOTH
280	FLEX A SPRAY BOOTH
290	FLEX B SPRAY BOOTH
295	SEALER B SPRAY BOOTH

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 001 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

York Group, Inc. dba York Casket Company, York Facility  
RACT Plan Approval Extension No. 67-2014 SIP requirements

The casket and furniture manufacturing facility includes the following sources:

Casket Manufacturing

Source: Manufacturer

**SECTION E. Source Group Plan Approval Restrictions.**

Stain Spray Booth: Devilbiss  
Wiping Stain & Fill Booth: Devilbiss  
Stain Oven: Devilbiss  
Touch Up: YCC  
\*Sealer Booth #1: Devilbiss  
\*Sealer Booth #2: Devilbiss  
Sealer Oven: Devilbiss  
\*Top Coat Booth #1: Devilbiss  
Top Coat Oven #1: Devilbiss  
\*Top Coat Booth #2: Devilbiss  
Top Coat Oven #2: Devilbiss  
Final Bake Oven: Devilbiss  
Utility Booth: Devilbiss  
Touch Up (Ethel Hosp.): Devilbiss  
Wax Job Station: YCC  
Specialty Booth: Devilbiss  
Specialty Oven: Devilbiss  
\*Small Part Booth & Wash Off Tank: Devilbiss/YCC  
Storage Area #1: YCC  
Storage Area #1: YCC

\*designates controlled booths

A. UPON APPROVAL BY EPA AS A SIP REVISION, THE REQUIREMENTS BELOW SHALL SUPERSEDE THE REQUIREMENTS OF GROUP G005A OF THIS PLAN APPROVAL.

1. The VOC RACT plan for this facility is to be implemented in accordance with the plans submitted with the application (as herein approved). [AS AN ALTERNATIVE TO THE BOOTHS CONTROLLED ABOVE BY THE CONCENTRATOR-CATALYTIC INCINERATOR, THE FACILITY MAY INSTEAD CONTROL BOOTHS 220, 225, 230, 240, 260 AND 295 WITH THE NEW RTOS C203A AND C203B]

3. This plan approval constitutes a RACT determination as per 25 Pa. Code Section 129.91 and 129.92 for the above sources.

4. The concentrator-catalytic incinerator is to be installed in accordance with the plans and specifications submitted with the application. [AS AN ALTERNATIVE TO THE BOOTHS CONTROLLED ABOVE BY THE CONCENTRATOR-CATALYTIC INCINERATOR, THE FACILITY MAY INSTEAD CONTROL BOOTHS 220, 225, 230, 240, 260 AND 295 WITH THE NEW RTOS C203A AND C203B]

5. Two sealer booths, two top coat booths, small part booth and wash off tank may only be operated when the concentrator-catalytic incinerator is operating. [AS AN ALTERNATIVE TO THE BOOTHS CONTROLLED ABOVE BY THE CONCENTRATOR-CATALYTIC INCINERATOR, THE FACILITY MAY INSTEAD CONTROL BOOTHS 220, 225, 230, 240, 260 AND 295 WITH THE NEW RTOS C203A AND C203B]

6. The VOC emissions generated from the casket and furniture manufacturing facility including clean-up covered under RACT Approval No. 67-2014 shall never exceed 100 tons per calendar year, 1,000 pounds per day or 100 pounds per hour. The calendar year is from 12:00 a.m. January 1 through 11:59 p.m. December 31. The rate of emissions per day is emissions from 12:00 a.m. through 11:59 p.m. on the same calendar day.

7. The VOC emissions from the exhaust of the concentrator-incinerator stacks shall be kept below 15 lbs/hr on a daily basis.

8. The company shall demonstrate that a minimum of 90% capture efficiency at controlled sources, at least 90% destruction efficiency for VOC, and total VOC emissions (including clean-up) are not exceeding 100 tons per year by performing stack tests and material balance, annually. [AS AN ALTERNATIVE, THE PERMITTEE MAY SHOW COMPLIANCE WITH THE 90% CAPTURE/90% DESTRUCTION REQUIREMENT BY DEMONSTRATING AN EQUIVALENT EMISSION REDUCTION FROM THE FACILITY ON AN ANNUAL BASIS, SUCH THAT NO MORE THAN 2.67 LB VOC PER CASKET UNIT PRODUCED ARE

**SECTION E. Source Group Plan Approval Restrictions.**

EMITTED TO THE OUTDOOR ATMOSPHERE.]

9. The company shall replace the existing standard spray nozzles with air assisted airless, high volume-low pressure (HVLP) or equivalent nozzles.

10. The coatings used for furniture manufacturing shall be complied with 25 Pa. Code §129.52, Table 1, Item No. 11 with an adjustment to a standard solvent density of 7.36 pounds per gallon and to a solid basis.



**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: G005C

Group Description: RACT 2 CASE BY CASE

Sources included in this group

ID	Name
200	CUSTOM SEALER SPRAY BOOTH
205	CUSTOM FILL AND STAIN SPRAY BOOTH
220	SEALER C SPRAY BOOTH
225	SEALER A SPRAY BOOTH
230	TOPCOAT A SPRAY BOOTH
240	TOPCOAT B SPRAY BOOTH
260	TOPCOAT C SPRAY BOOTH
270	WIPING STAIN SPRAY BOOTH
280	FLEX A SPRAY BOOTH
290	FLEX B SPRAY BOOTH
295	SEALER B SPRAY BOOTH

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §129.91]

**Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

(a) The permittee shall limit VOC emissions from the Group G005 spray paint booths by applying either waterborne topcoats or a combination of sealers and topcoats and strippable spray booth coatings with a VOC content equal to or less than the following limits (as applied to the substrate, minus water and exempt VOCs), expressed in units of pounds VOC per pound coating solids:

(1) waterborne topcoats = 0.8

(2) high solids coating systems

(A) sealer = 1.9

(B) topcoat = 1.8

(3) acid-cured alkyd amino systems

(A) acid-cured alkyd amino sealer = 2.3

acid-cured alkyd amino conversion varnish topcoat = 2.0

(B) other sealer = 1.9

acid-cured alkyd amino conversion varnish topcoat = 2.0

(C) acid-cured alkyd amino sealer = 2.3

other topcoat = 1.8

(4) waterborne strippable spray booth coating = 0.8

The VOC content of the as applied coating, expressed in units of pounds VOC per pound coating solids, shall be calculated as follows:

$$\text{VOC} = (\text{Wo})/(\text{Wn})$$

where:

**SECTION E. Source Group Plan Approval Restrictions.**

VOC = VOC content expressed in units of pounds VOC per pound coating solids

Wo = weight percent of VOC (Wv - Ww - Wex)

Wv = weight percent of total volatiles (100% - Wn)

Ww = weight percent of water

Wex = weight percent of exempt solvents

Wn = weight percent of solids of the as applied coating

(b) The VOC standards of part (a), above, do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

(c) The permittee shall comply with the more stringent emissions limitation contained in this permit condition or Condition #002, below.

**# 002 [25 Pa. Code §129.91]**

**Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

(a) The permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from the Group G005 spray paint booths in excess of the following limits (as applied to the substrate, minus water and exempt VOCs), expressed in units of pounds VOC per pound coating solids:

(1) topcoats and enamels = 3.0

(2) washcoat = 14.3

(3) final repair coat = 3.3

(4) basecoats = 2.2

(5) cosmetic specialty coatings = 14.3

(6) sealers = 3.9

The VOC content of the as applied coating, expressed in units of pounds VOC per pound coating solids, shall be calculated as follows:

$$\text{VOC} = (\text{Wo})/(\text{Wn})$$

where:

VOC = VOC content expressed in units of pounds VOC per pound coating solids

Wo = weight percent of VOC (Wv - Ww - Wex)

Wv = weight percent of total volatiles (100% - Wn)

Ww = weight percent of water

Wex = weight percent of exempt VOCs

Wn = weight percent of solids of the as applied coating

(b) The VOC standards of part (a), above, do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The permittee requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

(c) The permittee shall comply with the more stringent emissions limitation contained in this permit condition or Condition #001, above.

**SECTION E. Source Group Plan Approval Restrictions.****II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**III. MONITORING REQUIREMENTS.****# 003 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

(a) For each sealer, topcoat, strippable spray booth coating, enamel, washcoat, final repair coat, basecoat, and cosmetic specialty coating, the permittee shall demonstrate compliance with the emission standards contained at Conditions #001 and #002, above, by using one or more of the following methods:

- (1) Maintain Certified Product Data Sheets (CPDSs) for each of the coatings.
- (2) Maintain documentation showing the VOC content of the as applied coating in pounds VOC per pound coating solids, if solvent or other VOC is added to the coating before application.
- (3) Perform sampling and testing in accordance with the procedures and test methods in Chapter 139 (relating to sampling and testing) of the rules and regulations of the Department of Environmental Protection.

(b) The permittee shall submit, in writing, to the Department a compliance certification with the semi-annual report required by Condition #006, below.

- (1) The permittee shall demonstrate continuous compliance by the following:
  - (i) Using compliant coatings.
  - (ii) Maintaining records that demonstrate that the coatings are compliant.
  - (iii) Submitting a compliance certification which states that compliant sealers, topcoats, or both, and strippable spray booth coatings have been used each day in the semi-annual reporting period or should otherwise identify the days of non-compliance and the reasons for non-compliance.
- (2) The permittee shall demonstrate continuous compliance by following the work practice implementation plan and submitting a compliance certification which states that the work practice implementation plan is being followed, or should otherwise identify the periods of non-compliance with the work practice standards and the reasons for non-compliance.
- (c) The compliance certification shall be signed by a responsible official of the company that owns or operates the facility. In addition to the certification requirements of this section, the certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.

**IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

(a) The permittee shall keep records to demonstrate compliance with this permit condition and Conditions #001, #002, #003, #006, #007, and #008 of Section E (Group G005). The records shall be maintained for at least five (5) years and shall be made available to the Department upon its request.

(b) The permittee shall maintain the following records to demonstrate compliance with Condition #001, above:

- (1) A CPDS for each coating and strippable spray booth coating.
- (2) The VOC content as applied (pounds VOC per pound coating solids) of each coating and strippable spray booth coating, and copies of data sheets documenting how the as applied values were determined.



**SECTION E. Source Group Plan Approval Restrictions.**

(c) The permittee shall maintain on-site copies of the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including:

- (1) Records demonstrating that the operator training program is in place.
- (2) Records maintained in accordance with the leak inspection and maintenance plan.
- (3) Records associated with the cleaning and wash-off solvent accounting system.
- (4) Records associated with the limitation on the use of conventional air spray guns showing total coating usage and the percentage of coatings applied with conventional air spray guns for each semi-annual reporting period.
- (5) Records showing the VOC content of compounds used for cleaning booth components, except for solvent used to clean conveyors and their enclosures or metal filters.
- (6) Copies of logs and other documentation developed to demonstrate that the other provisions of the work practice implementation plan are followed.

(d) The permittee shall maintain a copy of the compliance certifications submitted in accordance with Condition #006, below, for each semi-annual period following the compliance date.

(e) The permittee shall maintain a copy of the information submitted with the semi-annual reports required by Condition #006, below.

**V. REPORTING REQUIREMENTS.****# 005 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

The permittee shall report any new surface coating, or any compositional changes in an existing surface coating that results in an increase in VOC content, to the Air Quality District Supervisor prior to its use. Information to be reported shall include the following items:

(a) The following parameters for each Group G005 coating, thinner and other component(s) as supplied:

- (1) The coating, thinner or component(s) name and identification number
- (2) The mix ratio for the as applied surface coating
- (3) The density or specific gravity
- (4) The weight percent of total volatiles, water, solids and exempt VOCs

(b) The VOC content of each coating, thinner and other component(s) as supplied.

(c) The VOC content of each as applied surface coating.

**# 006 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

The permittee shall submit to the Department a semi-annual report covering the previous six (6) months of wood casket manufacturing operations according to the following schedule:

(a) The semi-annual reporting periods shall be defined as January 1 to June 30 and July 1 to December 31.

(b) The semi-annual reports shall be submitted within 30 calendar days of the end of each subsequent 6-month reporting period.

(c) Each semi-annual report shall include the following:

- (1) Information required by Conditions #003(b) and #003(c), above
- (2) A statement of whether the permittee was in compliance or non-compliance
- (3) If the permittee was in non-compliance, the measures taken to bring the permittee into compliance.

**SECTION E. Source Group Plan Approval Restrictions.****VI. WORK PRACTICE REQUIREMENTS.****# 007 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

(a) The permittee shall:

(1) Maintain a written work practice implementation plan that defines work practices for each wood casket manufacturing operation and addresses the provisions in parts (b)-(j) of this permit condition. The permittee shall comply with the work practice implementation plan.

(2) Make available the written work practice implementation plan for inspection by the Department upon its request. If the Department determines that the work practice implementation plan does not adequately address the criteria specified in parts (b)-(j) of this permit condition, then the Department may require the permittee to modify the plan.

(b) The permittee shall implement an operator training program to be completed by new and existing personnel, including contract personnel, who are involved in coating, cleaning or wash-off operations or implementation of the requirements of this permit condition and Conditions #001, #002, #003, #004, #006 and #008 of Section E (Group G005).

(1) New personnel shall complete the operator training program upon hiring.

(2) All personnel shall be given refresher operator training annually.

(3) A copy of the written operator training program shall be maintained with the work practice implementation plan. The operator training program shall include the following:

(i) A list of all current personnel by name and job description that are required to be trained.

(ii) An outline of the subjects to be covered in the initial and annual refresher training sessions for each position or group of personnel.

(iii) Lesson plans for courses to be given at the initial and annual refresher training sessions that include, at a minimum, appropriate application techniques, appropriate cleaning and wash-off procedures, appropriate equipment setup, and adjustment to minimize coating usage and overspray and appropriate management of cleanup wastes.

(iv) A description of the methods to be used at the completion of the initial or annual refresher training sessions to demonstrate and document successful completion.

(v) A record of the date each employee is trained (initial and annual refresher training sessions).

(c) The permittee shall maintain (with the work practice implementation plan) a written leak inspection and maintenance plan that includes the following:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings or solvents.

(2) An inspection schedule.

(3) The methods for documenting the date and results of each inspection and any repairs that were made.

(4) The time frame between identifying a leak and making the repair, which shall adhere to the following schedule:

(i) A first attempt at repairs, including tightening of packing glands, shall be made within five (5) working days after the leak is detected.

(ii) 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.

**SECTION E. Source Group Plan Approval Restrictions.**

(d) The permittee shall develop a solvent accounting form to account for solvents used in cleaning and wash-off operations. The information recorded on the form shall include the following:

(1) The total number of pieces processed through wash-off operations each month and the reason for the wash-off operations.

(2) The name and total quantity of each solvent used each month for:

- (i) Cleaning activities.
- (ii) Wash-off operations.

(3) The name and total quantity of each solvent evaporated to the atmosphere each month from:

- (i) Cleaning activities.
- (ii) Wash-off operations.

(e) The permittee may not use compounds containing more than 8.0% (by weight) of VOC for cleaning spray paint booth components other than conveyors or metal filters, unless the spray paint booth is being refurbished. If the spray paint booth is being refurbished, that is, the spray paint booth coating or other material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of solvent to prepare the booth prior to applying the booth coating.

(f) The permittee shall use normally closed containers for storing coating, cleaning and wash-off materials.

(g) The permittee shall not use conventional air spray guns to apply coatings except under any of the following circumstances:

(1) To apply coatings that have a VOC content no greater than 1.0 pound VOC per pound of coating solids, as applied.

(2) For touch-up and repair coatings under one of the following circumstances:

- (i) The coatings are applied after completion of the wood casket manufacturing operation.
- (ii) The coatings are applied after the stain and before any other type of coating is applied, and the coatings are applied from a container that has a volume no greater than 2.0 gallons.

(3) The spray is automated, that is, the spray gun is aimed and triggered automatically (not manually).

(4) The emissions from the surface coating process are directed to the VOC control system (rotary VOC concentrator and RTO).

(5) The conventional air spray gun is used to apply coatings and the cumulative total usage of those coatings is no more than 5.0% of the total gallons of coating used during each semi-annual reporting period.

(6) The conventional air spray gun is used to apply stain on a part for which the Department notifies the permittee, in writing, of its determination that it is technically or economically infeasible to use any other spray application technology. To support the permittee's claim of technical or economic infeasibility, a videotape, a technical report or other documentation shall be submitted to the Department showing either independently or in combination, the following:

(i) The production speed is too high or the part shape is too complex for one operator to coat the part, and the application station is not large enough to accommodate an additional operator.

(ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

(h) The permittee shall pump or drain any solvent used for line cleaning into a normally closed container.

(i) The permittee shall collect any solvent used to clean spray guns into a normally closed container.

**SECTION E. Source Group Plan Approval Restrictions.**

(j) The permittee shall control the emissions from wash-off operations by the following:

(1) Using normally closed containers for wash-off operations.

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

**VII. ADDITIONAL REQUIREMENTS.****# 008 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

Upon issuance of this plan approval, the conditions in this Source Group shall supersede the Conditions in Source Group 005 in the facility's current Title V operating permit.

**# 009 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

[Additional authority for this permit condition is also derived from Operating Permit No. 67-02014A]

The permittee shall comply with the more stringent emissions limitation or applicable requirement for wood furniture manufacturing operations contained in 25 Pa. Code Section 129.52 and 25 Pa. Code Sections 129.101 through 129.107.