

August 25, 2003

Mr. Mark Charpie
R&D Manager
ITW Automotive Refinishing
1724 Indian Wood Circle, Ste J-K
Maumee, OH 43537-4048

Subject: **RULE 459 TRANSFER EFFICIENCY APPROVAL OF ITW DEVILBISS
GFG-670 (PLUS) SPRAY GUN**

Dear Mr. Charpie:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your August 14, 2002 petition requesting written approval of ITW DeVilbiss GFG-670 (Plus) spray gun. This review included submitting your request to the United States Environmental Protection Agency Region 9 (EPA) for approval as required by SMAQMD Rule 459.

On June 25, 2003, EPA granted conditional approval of the spray gun for use in the SMAQMD. A copy of EPA's approval letter is enclosed. Based on the information you submitted and EPA's approval, the SMAQMD hereby grants conditional approval of the ITW DeVilbiss GFG-670 (Plus) spray gun for use in the SMAQMD. This approval is subject to the following conditions.

1. ITW Automotive Refinishing shall supply written notification to each individual purchasing the ITW DeVilbiss GFG-670 (Plus) spray gun for use within the jurisdiction of the SMAQMD that the gun is only approved for the application of coatings subject to Rule 459, *Automotive, Truck and Heavy Equipment Refinishing Operations*.
2. This approval is only valid if the air pressure supplied to the ITW DeVilbiss GFG-670 (Plus) spray gun is equal to or less than 40 PSIG. ITW Automotive Refinishing shall supply written notification to each individual purchasing the ITW DeVilbiss GFG-670 (Plus) spray gun that the maximum air pressure supplied to the spray gun shall not exceed 40 PSIG.
3. ITW Automotive Refinishing shall supply a spray gun mounted needle valve and a pressure gauge clearly identifying the maximum allowable spray gun inlet air pressure to each individual purchasing an ITW DeVilbiss GFG-670 (Plus) spray gun for use within the jurisdiction of the SMAQMD. ITW Automotive Refinishing shall supply written notification to each individual purchasing the ITW DeVilbiss GFG-670 (Plus) spray gun that the spray gun mounted needle valve and pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.

4. This approval is only valid for the ITW DeVilbiss GFG-670 (Plus) spray gun model tested in the report "*Evaluation of the DeVilbiss Plus Spray Gun for use in the SCAQMD Area*" dated June 6, 2002.

If you have any questions concerning this matter, feel free to contact Patrick Tedeschi of my staff at (916) 874-4864.

Sincerely,



Nerrin Covell
Air Pollution Control Officer

L:\enf\msp\letters\devilbiss

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 25, 2003

Ms. Jessica DePrimo
Associate Air Quality Specialist
Sacramento Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814

Subject: Conditional Approval of ITW DeVilbiss GFG-670 (Plus) Spray Gun

Dear Ms. DePrimo

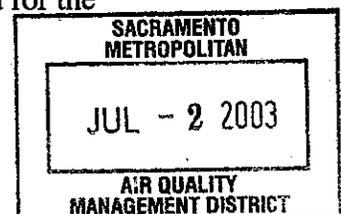
Sacramento Air Quality Management District (SMAQMD) requested EPA Region 9 assistance to determine whether the ITW DeVilbiss GFG-670 (Plus) spray gun was approvable as an alternative spray application method in accordance with District Rule 459 Automotive, Truck and Heavy Equipment Refinishing Operations. EPA has reviewed SMAQMD Rule 459, a South Coast Air Quality Management District (SCAQMD) approval letter which stated that this spray gun was capable of achieving a transfer efficiency which was equivalent to or better than high-volume low pressure (HVLP) spray equipment, and an associated test report, "Evaluation of the DeVilbiss Plus Spray Gun for use in the SCAQMD Area".

SMAQMD Rule 459, section 303.1 states that a person shall not apply any coating to any Group I or Group II vehicles or their parts and components unless HVLP spray equipment or one of three other application methods specified in section 303.1 is used. This section further states that other equivalent methods which have been approved in writing by the Air Pollution Control Officer (APCO) and submitted to and approved by the U.S. EPA may be used.

Based on our review of the above test report and South Coast AQMD's approval letter, EPA agrees that the ITW DeVilbiss GFG-670 (Plus) spray gun is capable of achieving equivalent or better transfer efficiency than HVLP spray equipment and can be used as an alternative application equipment under SMAQMD Rule 459.

EPA grants conditional approval of the ITW DeVilbiss GFG-670 (Plus) spray gun for use with SMAQMD Rule 459. Our approval is subject to the same conditions outlined in SCAQMD's approval letter to ITW dated August 9, 2002 and are repeated below for information.

1. ITW Automotive Refinishing shall supply written notification to each individual purchasing the ITW DeVilbiss GFG-670(Plus) spray gun for use within the jurisdiction of the Sacramento Air Quality Management District that the gun is only approved for the application of coatings subject to Rule 459.



Subject: Review of ITW DeVilbiss GFG-670 (Plus) Spray Gun (cont.)

2. This approval is only valid if the air pressure supplied to the ITW DeVilbiss GFG-670(Plus) is equal to or less than 40 PSIG. ITW Automotive Refinishing shall supply written notification to each individual purchasing the ITW DeVilbiss GFG-670(Plus) spray gun that the maximum air pressure supplied to the spray gun shall not exceed 40 PSIG.

3. ITW Automotive Refinishing shall supply a spray gun mounted needle valve and a pressure gauge clearly identifying the maximum allowable spray gun inlet air pressure to each individual purchasing an ITW DeVilbiss GFG-670(Plus) spray gun for use within the jurisdiction of the Sacramento Air Quality Management District. ITW Automotive Refinishing shall supply written notification to each individual purchasing the ITW DeVilbiss GFG-670(Plus) spray gun that the spray gun mounted needle valve and pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.

4. This approval is only valid for the ITW DeVilbiss GFG-670(Plus) spray gun model tested in the report "Evaluation of the DeVilbiss Plus Spray Gun for use in the SCAQMD Area", June 6, 2002.

Section 303.1c of Rule 459 also requires written approval of the Air Pollution Control Officer before alternative spray application equipment can be used in SMAQMD. The attachment to this letter contains additional suggestions to improve Rule 459 the next time it is updated. Please do not hesitate to contact Stanley Tong at (415) 947-4122 if you have any questions regarding this conditional approval.

Sincerely,



Andrew Steckel,
Chief, Rulemaking Office