



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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Commissioner

November 3, 2005

Mr. Mark E. Charpie
Engineering Manager
ITW Automotive Refinishing
1724 Indian Wood Circle
Maumee, OH 43537-4416

Dear Mr. Charpie:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Prevention, Business Compliance Division has received your request, pursuant to 310 CMR 7.03(16)(d)3, for approval to sell the ITW DeVilbiss GFG-670 (Plus) spray gun for use in Massachusetts, dated October 11, 2005. 310 CMR 7.03(16)(d)3 allows for the use of "...other coating application method(s) that achieves a transfer efficiency equivalent to electrostatic or HVLP spray application and is approved by the Department in writing."

Review of the submitted information demonstrates that the ITW DeVilbiss GFG-670 (Plus) spray gun was approved for use in the South Coast Air Quality Management District (SCAQMD) in a letter dated August 9, 2002. The ITW DeVilbiss GFG-670 (Plus) spray gun was tested according to the following procedures:

1. SCAQMD "Spray equipment Transfer Efficiency Test Procedure For Equipment Users" (May 24, 1989)
2. SCAQMD "Guidelines For Demonstrating Equivalency with District Approved Transfer Efficiency Spray Guns" (September 26, 2002)

Based on the results of SCAQMD testing and SCAQMD's approved use of the ITW DeVilbiss GFG-670 (Plus) spray gun, you have documented to the satisfaction of MassDEP that the transfer efficiency of the tested model is equal to or greater than high volume-low pressure (HVLP) spray equipment. Therefore, the ITW DeVilbiss GFG-670 (Plus) spray gun is approved for operations subject to 310 CMR 7.03(16) (Plan Application Exemption Requirements for Paint Spray

Booths) and 310 CMR 7.18(28) (Automotive Refinishing RACT), provided the following conditions are met:

1. ITW Automotive Refinishing shall supply with each ITW DeVilbiss GFG-670 (Plus) spray gun for use within the Commonwealth of Massachusetts written notification that the maximum air pressure supplied shall not exceed 40 psig.
2. ITW Automotive Refinishing shall supply with each ITW DeVilbiss GFG-670 (Plus) spray gun a gun mounted needle valve and a pressure gauge clearly identifying the maximum allowable inlet air pressure of 40 psig.
3. ITW Automotive Refinishing shall supply with each ITW DeVilbiss GFG-670 (Plus) spray gun written notification that the 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 use.

If you have any questions concerning this approval, please contact Paul Reilly of my staff at (617) 556-1097.

Very truly yours,



Steven A. DeGabriele, Director
Business Compliance Division
Bureau of Waste Prevention

cc: BWP, Regional C/E Chiefs
BWP, Regional Permit Chiefs