



Rachel Carson State Office Building
P.O. Box 8468
Harrisburg, PA 17105-8468
May 16, 2003

Bureau of Air Quality

717-787-9257

Mr. Mark E. Charpie, Engineering Manager
ITW Automotive Refinishing
1724 Indian Wood Circle, Suite J-K
Maumee, OH 43537-4048

CERTIFIED MAIL NO: 7000 1670 0002 7922 9903

Dear Mr. Charpie:

The Department has completed its review of the information submitted with your request for a determination by the Department that the ITW DeVilbiss GFG-670 (Plus) Spray Gun model achieves emission reductions equivalent to high volume low pressure (HVLP) or electrostatic spray application methods. Your request was made under 25 Pa. Code Section 129.75(e)(10) (relating to application equipment for mobile equipment repair and refinishing). The Department considered the information included in your original submittal packet of August 12, 2002, the additional information included with your letter of October 18, 2002, and the letter of qualifications provided by Mr. David Kaminski on April 11, 2003.

Based upon the information you provided, the Department has determined that the ITW DeVilbiss GFG-670 (Plus) Spray Gun model is capable of achieving emission reductions equivalent to HVLP or electrostatic spray application methods under 25 Pa. Code Section 129.75(e)(10). This determination authorizes the use of the ITW DeVilbiss GFG-670 (Plus) Spray Gun model for the application of coatings listed in Table III of 25 Pa. Code Section 129.75(c), in the Commonwealth of Pennsylvania, subject to the following conditions:

1. ITW Automotive Refinishing shall supply written notification to each person purchasing the ITW DeVilbiss GFG-670 (Plus) Spray Gun model for use in the Commonwealth of Pennsylvania that the Department has determined that the ITW DeVilbiss GFG-670 (Plus) Spray Gun model is equivalent to HVLP or electrostatic spray application methods only for the application of coatings listed in Table III of 25 Pa. Code Section 129.75.
2. This authorization is valid only if the air pressure supplied to the ITW DeVilbiss GFG-670 (Plus) Spray Gun model is equal to or less than 40 psig. ITW Automotive Refinishing shall supply written notification to each person purchasing the ITW DeVilbiss GFG-670 (Plus) Spray Gun model for use in the Commonwealth of Pennsylvania that the operation of the ITW DeVilbiss GFG-670 (Plus) Spray Gun model at an air pressure greater than 40 psig for application of coatings listed in Table III of 25 Pa. Code Section 129.75(c) constitutes a violation of 25 Pa. Code Section 129.75(e)(10).
3. ITW Automotive Refinishing shall supply a spray gun mounted needle valve and a pressure gauge that clearly identifies the maximum allowable spray gun inlet air pressure (40 psig) to each person purchasing an ITW DeVilbiss GFG-670 (Plus) Spray Gun model for use in the Commonwealth of Pennsylvania. ITW Automotive Refinishing shall supply written notification to each person purchasing the ITW DeVilbiss GFG-670 (Plus) Spray Gun model that failure to have the spray gun mounted needle valve and the pressure gauge attached to the spray gun and in good working condition whenever the spray gun is in operation constitutes a violation of 25 Pa. Code Section 129.75(e)(10).



4. This authorization is valid only for the ITW DeVilbiss GFG-670 (Plus) Spray Gun model described in the information submitted to the Department on August 12, 2002 and October 18, 2003.
5. In the event ITW Automotive Refinishing fails to comply with the conditions set forth in this letter, this authorization shall terminate and ITW Automotive Refinishing shall immediately discontinue the sale of the ITW DeVilbiss GFG-670 (Plus) Spray Gun model for use in Pennsylvania for the application of coatings listed in Table III of 25 Pa. Code Section 129.75(c).

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in Braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions regarding this approval, please contact Mr. Scott Kepner at 717-772-2330.

Sincerely,



Joyce E. Epps
Director
Bureau of Air Quality