

Allegheny County Health Department

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AIR QUALITY PROGRAM

301 39th Street, Building #7
Pittsburgh, PA 15201-1891

October 2, 2003

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

RE: *DeVilbiss GFG-670 (Plus) Spray Gun Equivalency Determination – ITW Automotive Refinishing, 1724 Indian Wood circle, Suite J-K, Maumee, OH 43537-4048*

Dear Mr. Charpie:

The Allegheny County Health Department Air Quality Program has completed a review of the "Transfer Efficiency and Solid Content Testing" procedure, dated January 15, 2002; the ITW Automotive Refinishing's "Evaluation of the DeVilbiss Plus Spray Gun for Use in the South Coast Air Quality Management District Area (SCAQMD)," dated June 06, 2002; and the SCAQMD and PADEP determination letters, dated August 07, 2002 and May 16, 2003 submitted with your request for an equivalency determination.

Based upon the technical information provided by ITW in their "Request-for-Determination," dated June 24, 2003, the Department has determined that the DeVilbiss GFG-670 (Plus) spray gun is capable of achieving emission reductions (transfer efficiency) equivalent to the HVLP or electrostatic spray application methods delineated in Article XXI §2105.75, "Mobile Equipment Repair and Refinishing," effective July 10, 2003. This determination authorizes the use of the DeVilbiss GFG-670 (Plus) spray gun in Allegheny County for the application of coating materials listed in Table 2105.75, subject to the following conditions:

1. ITW shall supply written notification with the purchase of each DeVilbiss GFG-670 (Plus) spray gun for use within Allegheny County that the Department has determined that this spray gun is *only* equivalent to HVLP or electrostatic spray application methods when applying a coating material delineated in Table 2105.10 of *Article XXI*.
2. This authorization is valid *only* if the air pressure supplied to the DeVilbiss GFG-670 (Plus) spray gun is equal to or less than 40 psig. ITW shall supply written notification with the purchase of each DeVilbiss GFG-670 (Plus) spray gun for

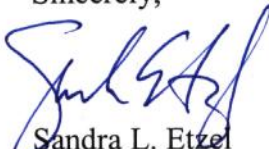
use in Allegheny County stating that the operation of this spray gun at an air pressure greater than 40 psig for application of coating materials listed in Table 2105.75 of *Article XXI* constitutes a violation of §2105.75.e.10 of *Article XXI*.

3. ITW shall supply a spray gun mounted needle valve and pressure gauge that clearly identifies the maximum allowable spray gun inlet air pressure with the purchase of each DeVilbiss GFG-670 (Plus) spray gun for use in Allegheny County. ITW shall supply written notification with the purchase of each DeVilbiss GFG-670 (Plus) spray gun stating that failure to have the spray gun mounted needle valve and pressure gauge attached to the spray gun in good working condition whenever the spray gun is in operation constitutes a violation of §2105.75.e.10 of *Article XXI*.

This authorization is valid *only* for the DeVilbiss GFG-670 (Plus) spray gun described in the technical information submitted to the Department in ITW's "Request-for-Determination" on June 24, 2003. In the event that ITW fails to comply with any of the conditions delineated within the Department's letter, the determination of the DeVilbiss GFG-670 (Plus) spray gun as equivalent to the HVLP and electrostatic spray application methods delineated in §2105.75.e.10 will be considered null and void and the sale of this spray gun within Allegheny County for the application of coating materials delineated in Table 2105.75 of *Article XXI* to be terminated immediately.

Should you have any further comments or question on this subject matter please contact me at (412) 578-8116.

Sincerely,



Sandra L. Etzel
Chief Engineer

DCM/dcm

Cc: Daniel Carl Morgan, Air Quality Engineer
Central File -[Determinations]