

CITY OF PHILADELPHIA

DEPARTMENT OF PUBLIC HEALTH John F. Domzalski Health Commissioner

Public Health Services Michael Lucas Assistant Health Commissioner

Air Management Services Morris Fine Director

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September 3, 2003

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

Dear Mr. Charpie:

Air Management Services (AMS) has reviewed your request for approval to sell and operate the DeVilbiss GFG-670 "Plus" spray gun in the City of Philadelphia. Based upon the information you have provided, AMS has determined that the spray gun is capable of achieving the same transfer efficiency as HVLP or electrostatic spray application methods, and therefore meets the requirements of Air Management Regulation (AMR) V, Section XIV (G)(1)(c). This determination authorizes the use of the ITW DeVilbiss GFG-670 "Plus" spray gun for the application of coatings listed in Table III of 25 Pa. Code Section 129.75(c), in the City of Philadelphia, 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 City of Philadelphia that AMS 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 City of Philadelphia 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) and AMR V, Section XIV (G)(1)(c).

- 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 City of Philadelphia. 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) and AMR V, Section XIV (G)(1)(c).
- 4. This authorization is valid only for the ITW DeVilbiss GFG-670 (Plus) Spray Gun model described in the information submitted to AMS on June 20, 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 the City of Philadelphia for the application of coatings listed in table III of 25 Pa. Code Section 129.75(c).

Sincerely,

Edward Braun

Chief, Source Registration