OhioEPA

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MAY 16 2007

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

Re: DeVilbiss non-HVLP GFG-670 (Plus) spray gun transfer efficiency vs HVLP

Dear Mr. Charpie

This letter is in response to your letter dated March 14, 2007, in which you requested written approval to sell and operate the DeVilbiss non-HVLP GFG-670 (Plus) spray gun in Ohio pursuant to Ohio Administrative Code (OAC) 3745-21-18(C)(1)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your letter, the supporting test documentation included in your letter, the letter from the South Coast Air Management District's (SCAQMD) and a website link suggested by you. The website link indicated other states, in addition to the SCAQMD, with equivalent rule requirements, have approved the use of this spray gun as an equivalent method to HVLP.

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected county*, specified in OAC rule 3745-21-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(1)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted indicates that the DeVilbiss GFG-670 (Plus) spray gun is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as found in the SCAQMD approval letter) and shall apply to any equipment sold and operated in the affected counties in Ohio:

a. This approval is only valid if the air pressure supplied to the ITW DeVilbiss GFG-670 spray gun is not greater than 40 PSIG. ITW Automotive Refinishing shall supply written notification to each individual purchasing and operating this spray gun, that the maximum air pressure supplied to the gun shall not exceed 40 PSIG.

b. 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 to each individual purchasing and operating an ITW DeVilbiss GFG-670 spray gun for use within the affected counties of this rule. ITW Automotive Refinishing shall supply written notification to each individual purchasing and operating the ITW DeVilbiss GFG-670 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.

c. The approval is only valid for the ITW DeVilbiss GFG-670 spray gun model tested.

*In the Cincinnati and Dayton metropolitan areas; Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties.

By means of this letter I am approving the use of the DeVilbiss GFG-670 (Plus) spray gun as an equivalent coating application method. Ohio EPA, as time allows, will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method and will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a link on our website for this rule which will indicate that this spray gun has been approved as an equivalent method to HVLP.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,

Chris Korleski
Director
Ohio EPA

cc: Lee Burkleca, DAPC
Bill Spires, DAPC
Donald L. Vanterpool, Legal Office