

June 2, 2009

Mr. Mark E. Charpie Innovations and Regulatory Affairs Manager DeVilbiss Automotive Refinishing 11360 S. Airfield Road Swanton, Ohio 43558

Dear Mr. Charpie:

Subject: Rule 1151 Transfer Efficiency Approval of the ITW DeVilbiss GFG-670

(Plus) Spray Gun

Reference is made to your application number 497036 which you submitted to request revision of the pressure gage requirement specified in our August 9, 2002 approval for your ITW DeVilbiss GFG-670 (Plus) spray gun. As part of our review of your request, we have incorporated your report entitled "Evaluation of the DeVilbiss Plus spray gun for use in the SCAQMD area" dated June 6, 2002 including the accompanying laboratory data dated April 23, 2002, supplemental information dated June 12, 2002, and e-mail dated March 4, 2009. The results of the transfer efficiency testing performed indicate that the ITW DeVilbiss GFG-670 (Plus) spray gun is capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment. As a result, the ITW DeVilbiss GFG-670 (Plus) spray gun is approved for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, under Rule 1151(d)(7)(A)(iii). This approval is an alternative to the approval letter dated August 9, 2002 and is subject to the following conditions.

- DeVilbiss Automotive Refinishing shall supply written notification with each ITW DeVilbiss GFG-670 (Plus) spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the spray gun is only approved for the application of coatings subject to Rule 1151.
- 2. This approval is only valid if the air pressure supplied to the ITW DeVilbiss GFG-670 (Plus) spray gun is equal to or less than 40 psig. DeVilbiss Automotive Refinishing shall supply written notification with each ITW DeVilbiss GFG-670 (Plus) spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the maximum air pressure supplied to the spray gun shall not exceed 40 psig.
- 3. DeVilbiss Automotive Refinishing shall supply a 100 psig (full scale) mechanical pressure gauge with markings every 2 psig or a 160 psig (full scale)

digital pressure gauge that measures in 1 psig increments with each ITW DeVilbiss GFG-670 (Plus) spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District. DeVilbiss Automotive Refinishing shall supply written notification with each ITW DeVilbiss GFG-670 (Plus) spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.

- 4. This approval is only valid if during actual operation the ITW DeVilbiss GFG-670 (Plus) spray gun is equipped with a properly operating pressure gauge that meets the criteria specified in condition no. 3.
- 5. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation #410 and that the inlet air pressure shall not exceed 40 psig to all ITW DeVilbiss GFG-670 (Plus) spray guns sold or distributed for use within the South Coast Air Quality Management District.
- 6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a GFG-670 or Plus spray gun on all ITW DeVilbiss GFG-670 (Plus) spray guns sold or distributed for use within the South Coast Air Quality Management District.
- 7. This approval is only valid if during actual operation the ITW GFG-670 (Plus) spray guns are labeled as described in condition numbers 5 and 6.
- 8. This approval is only valid for the ITW DeVilbiss GFG-670 (Plus) spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the South Coast Air Quality Management District.

If you have any questions regarding this approval, please call me at (909) 396-2576 or send me an e-mail at flettice@aqmd.gov.

Sincerely,

Fred Lettice Senior Manager

Coating, Printing, Aerospace &

Metal Finishing Operations