

# STATE OF COLORADO

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Bill Ritter, Jr., Governor  
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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

June 22, 2007

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

Re: ITW DeVilbiss – Request for RACT Equivalency Determination for DeVilbiss GFG-670 (Plus)  
Spray Gun

Dear Mr. Charpie:

The Air Pollution Control Division (the Division) has reviewed your request dated March 15, 2007 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for ITW Automotive Refinishing's (ITW's) DeVilbiss GFG-670 (Plus) paint spray gun. In your submittal, you provided a copy of an approval letter from the South Coast Air Quality Management District (California) as well as the results from a transfer efficiency test. ITW maintains a list of this and other regulatory agency approval letters on its company web site.

Colorado Air Quality Control Commission (AQCC) Regulation Nos. 3 and 7 establish RACT requirements for sources in the Denver 1-Hour Ozone Attainment/Maintenance Area. The Denver 1-Hour Ozone Area is composed of Denver, Jefferson, Douglas, Broomfield and Boulder (excluding Rocky Mountain National Park) Counties plus the portions of Arapahoe and Adams Counties west of Kiowa Creek.

The Division has previously determined that High Volume Low Pressure (HVLP) paint spray guns constitute RACT for surface coating operations that involve the application of base coats and clear coats in general, and for any top coat applied to a large area. A large area is defined as any area greater than nine (9) square feet. Subject surface coating owner/operators within the Denver 1-Hour Ozone Area must obtain written permission from the Division prior to using any method other than HVLP application for applying base coats, clear coats or large area top coats.

The results of the transfer efficiency testing attached to the South Coast Air Quality Management District approval letter indicate that the DeVilbiss GFG-670 (Plus) spray gun is capable (under specified operating parameters) of achieving equivalent or better transfer efficiency than HVLP spray equipment. Based on this review, the Division approves its use under the following conditions:

1. The air pressure supplied to the DeVilbiss GFG-670 (Plus) spray gun is equal to or less than 40 pounds per square inch gauge (psig).
2. An appropriate spray gun-mounted needle valve and pressure gauge, provided by ITW is attached to the DeVilbiss GFG-670 (Plus) spray gun and is in good working condition during actual operation. The gauge must clearly indicate that the maximum air pressure to be used is 40 psig and the spray gun must be operated as such.
3. A clearly visible permanent label specifying that the inlet air pressure shall not exceed 40 psig is attached to all DeVilbiss GFG-670 (Plus) spray guns used; and they must be operated as such.
4. ITW shall supply written notification to each individual purchasing a DeVilbiss GFG-670 (Plus) spray gun for use within the Denver 1-Hour Ozone Area indicating that its use is only approved when operated under the conditions specified in this letter.
5. The operator can produce a copy of this letter for inspection by the Division or local agency personnel upon their request.
6. Only the DeVilbiss GFG-670 (Plus) spray gun model is covered by this approval.

Please note that the Division is making this determination based on a reliance on the validity and accuracy of the information that ITW provided in its transmittal. Please do not hesitate to contact me at 303-692-3252 or [Roland.Hea@state.co.us](mailto:Roland.Hea@state.co.us) if you have any questions regarding this letter or would like to further discuss this issue. Thank you.

Sincerely,



Roland C. Hea, P.E.  
Permitting Section Supervisor  
Stationary Sources Program  
Air Pollution Control Division  
APCD-SS-B1

cc: Mr. Paul Carr – APCD (all cc: via e-mail only)  
Mr. R K Hancock III – APCD  
Mr. Robert Jorgenson – APCD  
Ms. Kirsten King – APCD  
Ms. Shannon McMillan – APCD