



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

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August 9, 2011

DeVilbiss Automotive Refinishing

Attn: William J. Hofert, Controller and Acting Regulatory Manager

11360 S. Airfield Road

Swanton, OH 43588

RE: Petition for area sale of specific non-HVLP DeVilbiss Automotive Refinishing spray guns

Dear Mr. Hofert,

The Department of Environmental Quality reviewed your formal petition and the supplemental information provided in your July 26, 2011 request. As you noted, EPA approved the following guns for operational use under 40 CFR Part 63 Subpart HHHHHHH:

TEKNA Pro spray gun with TE10 air cap	35 psig
TEKNA ProLite spray gun with TE10 air cap	35 psig
TEKNA Pro spray gun with TE20 air cap	26 psig
TEKNA ProLite spray gun with TE20 air cap	26 psig

All information regarding which non-HVLP spray guns have been approved by EPA to be operated in compliance with the 40 CFR Part 63 Subpart HHHHHHH rule may be found at:

<http://www.epa.gov/ttn/atw/6h/6hpg.html#imp>. Please inform your customers of this link and that they need to keep a copy of EPA's approval of any of the listed equipment (i.e. non-HVLP spray guns) that they operate on site at their facility in order to demonstrate compliance with the rule. The rule states (40 CFR 63.11173(e)(5) and 53.1179(c)) that non-HVLP spray gun approvals are to be reviewed and granted by EPA only and not individual states, so your EPA approval is all that is needed.

If you have any additional questions, please let me know.

Sincerely,

Patricia Huback

Regional Air Toxics Specialist

DEQ Northwest Region

huback.patricia@deq.state.or.us





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

Mr. Marvin Burns
Senior Project Engineer
DeVilbiss Automotive Refinishing
11360 South Airfield Road
Swanton, Ohio 43558

JUL 20 2011

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Burns:

This letter is in response to your May 4, 2011, request for approval of the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns, hereinafter referred to as the DeVilbiss spray guns, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns for use when spray applying automotive refinish coatings under subpart HHHHHH of 40 CFR Part 63.

We have completed our review of your reports entitled:

- Final Report; Evaluation of the DeVilbiss Tekna Pro (and Tekna Pro Lite) for use as equivalent technology to HVLP, as defined in 40 CFR 63.11173(e);
- Standard Test Protocol For Demonstrating Equivalency of DeVilbiss Non-HVLP Gravity Feed Spray Guns For EPA approval per 40 CFR 63.11173(e);
- Supplement to the DeVilbiss Automotive Refinishing “Standard Test Protocol for Demonstrating Equivalency of DeVilbiss Non-HVLP Gravity Feed Spray Guns For EPA approval per 40 CFR 63.11173(e),” dated 2/8/11;

The results of the transfer efficiency testing performed indicate that the DeVilbiss spray guns are capable of achieving equivalent or better transfer efficiency than the HVLP spray equipment. As a result, the DeVilbiss spray guns are approved for use in operations subject to §63.11173(e)(3) of 40 CFR part 63 subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions.

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the spray gun is approved as providing equivalent transfer efficiency as HVLP spray guns for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH
2. This approval is only valid for the DeVilbiss spray guns if the air pressure supplied is equal to or less than that stated for each spray gun below:

TEKNA Pro spray gun with TE10 air cap	35 psig
TEKNA ProLite spray gun with TE10 air cap	35 psig
TEKNA Pro spray gun with TE20 air cap	26 psig
TEKNA ProLite spray gun with TE20 air cap	26 psig

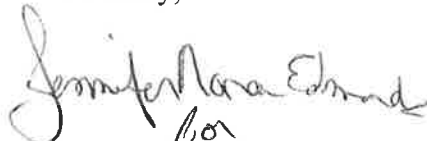
Additionally, DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed the values stated above for each spray gun for the application of coatings subject to 40 CFR part 63 subpart HHHHHH.

3. DeVilbiss Automotive Refinishing shall supply an appropriate pressure gauge to allow precise measurement of the inlet air pressure, reflecting the maximum air pressure for the specific gun, with each DeVilbiss spray gun sold or distributed for the application of coatings subject to 40 CFR part 63 subpart HHHHHH. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation for the application of coatings subject to 40 CFR part 63 subpart HHHHHH.

4. This approval is only valid if during actual operation the DeVilbiss spray gun is equipped with a properly operating pressure gauge as described in condition number 3 and operated at or below the operating pressures as listed in condition number 2.

If you have any questions regarding this approval, please contact Kim Teal, of my staff, at (919) 541-5580 or teal.kim@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephen D. Page".

Stephen D. Page

Director

Office of Air Quality Planning
and Standards