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Date: August 17, 2011
Subject: **Authorization for Sale and Use within Texas of DeVilbiss Automotive Refinishing TEKNA® Pro and ProLite Spray guns**

To Whom It May Concern:

Laws exist in the State of Texas to control air pollution from volatile organic compounds sourced from vehicle refinishing (body shop) operations, and these rules specify spray gun performance criteria. From the Texas Commission on Environmental Quality – Air Permits Division, we have been advised “if [your equipment] meets the intent of our rules including 30TAC 115.422(2), then it can be sold in the state of Texas”.

Please be assured of our product’s compliance with Texas environmental laws and their appropriateness for sale and use in the State of Texas.

Two Texas Administrative Codes relevant to the sale and use of spray guns in Texas are:

30TAC 106.436(8) *Auto Body Refinishing Facility*: “High transfer efficiency coating application equipment shall be used, such as high volume low pressure spray guns. Electrostatic spray guns or other methods, if demonstrated to provide equivalent or better transfer efficiency are acceptable”; and

30TAC 115.422(2) *Surface Coating Processes – Control Requirements*: “Each vehicle refinishing (body shop) operation shall use coating application equipment with a transfer efficiency of at least 65% ... High-volume low-pressure (HVLP) spray guns are assumed to comply with the 65% transfer efficiency requirement.”

The attached approval letter from the Director, Office of Air Quality Planning and Standards, United States Environmental Protection Agency (EPA) states:

“The results of the transfer efficiency testing performed indicate that the DeVilbiss [Pro and ProLite] spray guns are capable of achieving equivalent or better transfer efficiency than the HVLP spray equipment”. Furthermore, the EPA review also approved the guns “for use in operations subject to 40 CFR part 63 subpart HHHHHH, “Paint Stripping and Miscellaneous Surface Coating Operations”.

This EPA approval is valid within constraints or boundary conditions spelled out in their memo, and specifically 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

The Texas Commission on Environmental Quality requires spray gun manufacturers to make this documentation available to spray gun users. Painters and Shop owners may be asked to produce this document upon request of personnel from the commission or any other air pollution control agency with jurisdiction. Additional copies of related approval authorizations may be obtained on our website: www.autorefinishdevilbiss.com/app_letters_teknapro.php

Sincerely,

William J. Hofert
Controller and Acting Regulatory Manager
DeVilbiss Automotive Refinishing

Att: U.S. EPA Approval letter dated July 20, 2011





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

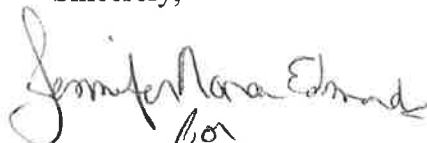
Additionally, DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed the values stated above for each spray gun for the application of coatings subject to 40 CFR part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