



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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October 24, 2011

Mr. William J. Hofert
Controller and Acting Regulatory Manager
DeVilbiss Automotive Refinishing
11360 South Airfield Road
Swanton, OH 43558

Dear Mr. Hofert:

Subject: DeVilbiss TEKNA Pro and TEKNA Pro Lite Spray Guns

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Prevention, Business Compliance Division has received your request, pursuant to 310 CMR 7.03(16)(d)3, for approval to sell the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns for use in Massachusetts, dated July 26, 2011. 310 CMR 7.03(16)(d)3 allows for the use of ... "other coating application method(s) that achieves a transfer efficiency equivalent to electrostatic or HVLP spray application and is approved by the Department in writing."

Review of the submitted information demonstrates that the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns were approved by the US EPA for operations subject to section 63.11173(e)(3) of 40 CFR part 63 subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations, in a letter dated July 20, 2011. It is also noted that the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns were approved for use by the South Coast Air Quality Management District (SCAQMD) in a letter dated September 8, 2011. The DeVilbiss TEKNA Pro and Pro Lite spray guns were tested in accordance with procedures that are equivalent to the following:

1. SCAQMD "Spray equipment Transfer Efficiency Test Procedure For Equipment Users" (May 24, 1989)
2. SCAQMD "Guidelines For Demonstrating Equivalency with District Approved Transfer Efficiency Spray Guns" (September 26, 2002)

Based on the results of the testing and written approvals of the DeVilbiss TEKNA Pro and Pro Lite spray guns by US EPA and SCAQMD, you have documented to the satisfaction of MassDEP that the transfer efficiency of the tested models are equal to or greater than high volume-low pressure (HVLP) spray equipment. Therefore, the DeVilbiss TEKNA Pro and Pro Lite spray guns with TE10 or TE20 air caps are approved for operations in Massachusetts, including but not limited to, those subject to 310 CMR 7.03(16) (Plan Application Exemption Requirements for Paint Spray Booths) and 310 CMR 7.18(28) (Automotive Refinishing RACT), provided the following conditions are met:

1. The inlet air pressure supplied to the DeVilbiss TEKNA Pro and Pro Lite spray guns shall not exceed the following:

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

2. DeVilbiss Automotive Refinishing shall supply with each DeVilbiss TEKNA Pro and Pro Lite spray gun with a TE10 or TE20 air cap, sold or distributed for use within the Commonwealth of Massachusetts, written notification of the maximum allowable inlet air pressure supplied to each spray gun as specified above.
3. DeVilbiss Automotive Refinishing shall supply with each DeVilbiss TEKNA Pro and Pro Lite spray gun with TE10 or TE20 air cap, 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. DeVilbiss Automotive Refinishing shall supply with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within Massachusetts written notification 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. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation TE10 or TE20, as applicable, and that the inlet air pressure will not exceed 35 psig (TE10) or 26 psig (TE20), with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use in Massachusetts.
5. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the spray gun body is a DeVilbiss TEKNA Pro or Pro Lite spray gun, as applicable.

If you have any questions concerning this approval, please contact Paul Reilly of my staff at (617) 556-1097.

Very truly yours,



Steven A. DeGabriele, Director
Business Compliance Division
Bureau of Waste Prevention

cc: BWP, Regional C/E Chiefs
BWP, Regional Permit Chiefs