

February 23, 2012

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

Subject: **Rule 459 Transfer Efficiency Equivalent Approval of the DeVilbiss TEKNA Pro and TEKNA ProLite Spray Guns with the TE 10 Air Cap**

Dear Mr. Hofert:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your July 26, 2011 petition requesting approval of the DeVilbiss TEKNA Pro and Tekna ProLite spray guns with the TE 10 air cap as having a transfer efficiency equivalent to or better than high volume low pressure (HVLP) spray equipment. The review included evaluating the report titled "Evaluation of the DeVilbiss TEKNA Pro and TEKNA Pro Lite High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District (SCAQMD)" dated June 2011, the United States Environmental Protection Agency's approval letter of the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns dated July 20, 2011, and the South Coast Air Quality Management District's approval letter of the DeVilbiss TEKNA Pro and Tekna Pro Lite High Efficiency Spray Guns with the TE 10 Air Cap dated September 8, 2011.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the spray guns were determined by the test methods specified SMAQMD Rule 459 and the transfer efficiency of the DeVilbiss TEKNA Pro and Tekna ProLite spray guns with the TE 10 air cap were verified to be equivalent to, or higher than, HVLP spray equipment. Based on this review, the SMAQMD hereby grants conditional approval of the DeVilbiss TEKNA Pro and TEKNA ProLite Spray Guns with the TE 10 Air Cap for use in the SMAQMD. This approval is subject to the following conditions.

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro or TEKNA ProLite spray gun with the TE 10 air cap sold or distributed for use within the jurisdiction of the SMAQMD that the spray gun is only approved for the application of color coatings and clear coatings subject to Rule 459.
2. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 10 air cap is equal to or less than 35 psig. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and TEKNA ProLite spray gun with the TE 10 air cap sold or distributed for use within the jurisdiction of the SMAQMD that the maximum air pressure supplied to the spray gun shall not exceed 35 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

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Subject: Rule 459 Transfer Efficiency Equivalent Approval of the DeVilbiss TEKNA Pro and TEKNA ProLite Spray Guns with the TE 20 Air Cap

Dear Mr. Hofert:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your July 26, 2011 petition requesting approval of the DeVilbiss TEKNA Pro and Tekna ProLite spray guns with the TE 20 air cap as having a transfer efficiency equivalent to or better than high volume low pressure (HVLP) spray equipment. The review included evaluating the report titled "Evaluation of the DeVilbiss TEKNA Pro and TEKNA Pro Lite High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District (SCAQMD)" dated June 2011, the United States Environmental Protection Agency's approval letter of the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns dated July 20, 2011, and the South Coast Air Quality Management District's approval letter of the DeVilbiss TEKNA Pro and Tekna Pro Lite High Efficiency Spray Guns with the TE 20 Air Cap dated September 8, 2011.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the spray guns were determined by the test methods specified SMAQMD Rule 459 and the transfer efficiency of the DeVilbiss TEKNA Pro and Tekna ProLite spray guns with the TE 20 air cap were verified to be equivalent to, or higher than, HVLP spray equipment. Based on this review, the SMAQMD hereby grants conditional approval of the DeVilbiss TEKNA Pro and TEKNA ProLite Spray Guns with the TE 20 Air Cap for use in the SMAQMD. This approval is subject to the following conditions.

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro or TEKNA ProLite spray gun with the TE 20 air capsold or distributed for use within the jurisdiction of the SMAQMD that the spray gun is only approved for the application of color coatings and clear coatings subject to Rule 459.
2. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 20 air cap is equal to or less than 26 psig. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and TEKNA ProLite spray gun with the TE 20 air cap sold or distributed for use within the jurisdiction of the SMAQMD that the maximum air pressure supplied to the spray gun shall not exceed 26 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 DeVilbiss TEKNA Pro and TEKNA ProLite spray gun with the TE 20 air cap sold or distributed for use within the jurisdiction of the SMAQMD. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and TEKNA ProLite spray gun with the TE 20 air cap sold or distributed for use within the jurisdiction of the SMAQMD 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 DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 20 air cap are equipped with a properly operating pressure gauge that meets the criteria specified in condition number 3.
5. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation TE 20 and that the inlet air pressure shall not exceed 26 psig to all DeVilbiss TEKNA Pro and TEKNA ProLite spray guns sold or distributed for use within the SMAQMD.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss TEKNA Pro or TEKNA ProLite on all DeVilbiss TEKNA Pro and TEKNA ProLite spray guns sold or distributed for use within the SMAQMD.
7. This approval is only valid if during actual operation the DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 20 air cap are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 20 air cap model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the SMAQMD.

If you have any questions concerning this matter, feel free to contact Patrick Tedeschi of my staff at (916) 874-4864.

Sincerely,



Larry Greene
Executive Director/Air Pollution Control Officer

measures in 1 psig increments with each DeVilbiss TEKNA Pro and TEKNA ProLite spray gun with the TE 10 air cap sold or distributed for use within the jurisdiction of the SMAQMD. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and TEKNA ProLite spray gun with the TE 10 air cap sold or distributed for use within the jurisdiction of the SMAQMD 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 DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 10 air cap are equipped with a properly operating pressure gauge that meets the criteria specified in condition number 3.
5. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation TE 10 and that the inlet air pressure shall not exceed 35 psig to all DeVilbiss TEKNA Pro and TEKNA ProLite spray guns sold or distributed for use within the SMAQMD.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss TEKNA Pro or TEKNA ProLite on all DeVilbiss TEKNA Pro and TEKNA ProLite spray guns sold or distributed for use within the SMAQMD.
7. This approval is only valid if during actual operation the DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 10 air cap are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the TE 10 air cap model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the SMAQMD.

If you have any questions concerning this matter, feel free to contact Patrick Tedeschi of my staff at (916) 874-4864.

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