

# Allegheny County Health Department

## DIRECTOR

Bruce W. Dixon, M.D.



## AIR QUALITY PROGRAM

301 39<sup>th</sup> Street – Bldg. #7  
Pittsburgh, PA 15201-1891

Phone: (412) 578-8115  
Fax: (412) 578-8144

March 14, 2012

## BOARD OF HEALTH

Paul M. King, Esq., Q.E.P.  
Chair

Lee Harrison, M.D.  
Vice Chair

Rev. Ricky V. Burgess  
Donald S. Burke, M.D.

Joan Cleary, R.N.

Anthony Ferraro

James M. Flynn, Jr.

Ellen C. Stewart, M.D.

William Youngblood

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

***RE: Formal petition requesting written approval for area sale of specific non-HVLP DeVilbiss Automotive Refinishing spray guns***

Dear Mr. Hofert:

The Department has reviewed DeVilbiss' petition requesting written approval for area sale of specific non-HVLP DeVilbiss Automotive Refinishing spray guns and has completed a review of the "Final Report - Evaluation of the DeVilbiss TEKNA Pro and TEKNA Pro Lite for use as an equivalent technology to HVLP, as defined in 40 CFR 63.11173(e)", dated May 2, 2011, the EPA approval letter dated July 20, 2011 and the South Coast Air Quality Management District (SCAQMD) approval letters, dated September 8, 2011 that were submitted with your request for an equivalency determination.


Based upon the technical information provided above, the Department has determined that the DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap are capable of achieving emission reductions (transfer efficiency) equivalent to or better than the HVLP or electrostatic spray application methods delineated in Article XXI §2105.75, "Mobile Equipment Repair and Refinishing," effective April 15, 2008. This determination authorizes the sale of the DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap in Allegheny County for the application of coating materials listed in Table 2105.75, subject to the following conditions:

1. DeVilbiss shall supply written notification with the purchase of each DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap for use within Allegheny County that the Department has determined that this spray gun is *only* equivalent to HVLP or electrostatic spray application methods when applying a coating material delineated in Table §2105.10 of Article XXI.

2. This authorization is valid *only* if the air pressure supplied to each spray gun under the following conditions:
  - a. DeVilbiss TEKNA Pro Spray Gun with TE10 air cap is equal to or less than 35 psig;
  - b. DeVilbiss TEKNA Pro Spray Gun with TE20 air cap is equal to or less than 26 psig;
  - c. DeVilbiss TEKNA ProLite Spray Gun with TE10 air cap is equal to or less than 35 psig; and
  - d. DeVilbiss TEKNA ProLite Spray Gun with TE20 air cap is equal to or less than 26 psig.
3. DeVilbiss shall supply written notification with the purchase of each DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap for use in Allegheny county stating that the operation of these spray guns at an air pressure greater than Condition 2 above for application of coating materials listed in Table 2105.75 of Article XXI constitutes a violation of §2105.75.e.10 of Article XXI.
3. DeVilbiss shall supply a spray gun mounted needle valve and pressure gauge that clearly identifies the maximum allowable spray gun inlet air pressure with the purchase of each DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap for use in Allegheny County. DeVilbiss shall supply written notification with the purchase of each DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap stating that failure to have the spray gun mounted needle valve and pressure gauge attached to the spray gun in good working condition whenever the spray gun is in operation constitutes a violation of §2105.75.e.10 of Article XXI.

This authorization is valid only for the DeVilbiss TEKNA Pro Spray Gun with TE10 and TE20 air cap and the TEKNA ProLite spray gun with the TE10 and TE20 air cap described in the technical information submitted to the Department in DeVilbiss' "Request-for- Determination" on July 27, 2011. In the event that DeVilbiss fails to comply with any of the conditions delineated within the Department's letter, the determination will be considered null and void and the sale of these spray guns within Allegheny County for the application of coating materials delineated in Table 2105.75 of Article XXI to be terminated immediately. If you have any questions regarding this letter, please call me at (412)-578-8366.

Sincerely,



David D. Good  
Air Pollution Control Engineer II

cc: Dan Morgan  
Dean Deluca