

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

217/785-4140 TDD 217/782-9143

August 2, 2011

William J. Hofert DeVilbiss Automotive Refinishing 11360 S. Airfield Road Swanton, OH 43558

RE: Formal Petition Requesting Approval for Area Sale of Specific Non-HVLP (High Volume Low Pressure) DeVilbiss Automotive Refinishing Spray Guns

Dear Mr. Hofert:

This letter is in response to your formal petition dated and received July 26, 2011, requesting approval for the area sale of the following four specific non-HVLP DeVilbiss automotive refinishing spray guns:

TEKNA Pro spray gun with TE10 air cap at or under 35 PSIG TEKNA ProLite spray gun with TE10 air cap at or under 35 PSIG TEKNA Pro spray gun with TE20 air cap at or under 26 PSIG TEKNA ProLite spray gun with TE20 air cap at or under 26 PSIG

Illinois EPA notes that USEPA has already approved the use of these four specific non-HVLP DeVilbiss spray guns as having transfer efficiency equivalent to or better than HVLP in the letter from USEPA dated July 20, 2011.

Illinois EPA agrees that these four specific spray guns listed above are approvable for use under Section 218/219.219(b)(6)(H) with the following conditions set by USEPA and reiterated in this letter of approval:

- 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 coating subject to 40 CFR 63 Subpart HHHHHHH and 35 Ill. Adm. Code 218.219(b)(6)(H) and 219.219(b)(6)(H).
- This approval is only valid for the DeVilbiss spray guns if the air pressure supplied is equal to or less than that stated above.
- 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 above for each spray gun for
 the application of coatings subject to 40 CFR part 63 Subpart HHHHHHH and 35
 Ill. Adm. Code 218.219(b)(6)(H) and 219.219(b)(6)(H).

- 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 and 35 Ill. Adm. Code 218.219(b)(6)(H) and 219.219(b)(6)(H). 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 HHHHHHH and 35 Ill. Adm. Code 218.219(b)(6)(H) and 219.219(b)(6)(H).
- This approval is only valid if, during actual operation, the DeVilbiss spray gun is
 equipped with a properly operating pressure gauge as described above and
 operated at or below the operating pressures listed above.

If you have any questions regarding this approval, please contact Jackie Sims, of my staff, at 217-782-9333.

Sincerely,

James R. Ross, Manager

Division of Air Pollution Control

Illinois EPA