

STATE OF COLORADO

John W. Hickenlooper, Governor
Christopher E. Urbina, MD, MPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory Services Division
Denver, Colorado 80246-1530 8100 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
Located in Glendale, Colorado (303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

August 9, 2011

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

Re: Request for RACT Equivalency Determination for DeVilbiss TEKNA Pro Spray Gun with TE10 Air Cap

Dear Mr. Hofert:

The Air Pollution Control Division (the Division) has reviewed your request dated July 26, 2011 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for DeVilbiss Automotive Refinishing's (DeVilbiss's) TEKNA Pro spray gun with TE10 air cap. In your submittal, you provided a copy of a July 20, 2011 Maximum Achievable Control Technology, 40 CFR Part 63, Subpart HHHHHH approval letter from the U.S. Environmental Protection Agency (EPA) as well as the results from a transfer efficiency test. DeVilbiss maintains a list of this and other regulatory agency approval letters on its company web site.

Colorado Air Quality Control Commission (AQCC) Regulation Nos. 3 and 7 establish RACT requirements for sources in the Denver ozone non-attainment area (also referred to as the 8-hour Ozone Control Area, which includes the area that was previously designated as the Denver 1-hour Ozone Attainment/Maintenance Area). The Denver ozone non-attainment area is composed of Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas and Jefferson Counties, plus significant portions of Larimer and Weld Counties.

The Division has previously determined that High Volume Low Pressure (HVLP) paint spray guns constitute RACT for surface coating operations that involve the application of base coats and clear coats in general, and for any top coat applied to a large area. A large area is defined as any area greater than nine (9) square feet. Subject surface coating owner/operators within the Denver ozone non-attainment area must obtain written permission from the Division prior to using any method other than HVLP application for applying base coats, clear coats or large area top coats.

The results of the transfer efficiency testing included in your transmittal indicate that the DeVilbiss TEKNA Pro spray gun with TE10 air cap is capable (under specified operating parameters) of achieving equivalent or better transfer efficiency than HVLP spray equipment. Based on this review, the Division approves its use under the following conditions:

1. The air pressure supplied to the DeVilbiss TEKNA Pro spray gun with TE10 air cap is equal to or less than 35 pounds per square inch gauge (psig).
2. An appropriate mechanical or digital pressure gauge, supplied by DeVilbiss, is attached to the TEKNA Pro spray gun with TE10 air cap and is in good working condition during actual operation.
3. A clearly visible permanent label specifying that the inlet air pressure shall not exceed 35 psig is attached to the TE10 air cap on all TEKNA Pro spray guns used.
4. A clearly visible permanent label identifying the TEKNA Pro spray gun body is attached to the gun body on all TEKNA Pro spray guns used.
5. DeVilbiss shall supply written notification to each individual purchasing a TEKNA Pro spray gun with TE10 air cap for use within the Denver ozone non-attainment area indicating that its use is only approved when operated under the conditions specified in this letter.
6. The operator can produce a copy of this letter for inspection by the Division or local agency personnel upon their request.
7. Only the TEKNA Pro spray gun with TE10 air cap model is covered by this approval.

Please note that the Division is making this determination based on a reliance on the validity and accuracy of the information that DeVilbiss provided in its transmittal. Please do not hesitate to contact me at 303-692-3252 or Roland.Hea@state.co.us if you have any questions regarding this letter or would like to further discuss this issue. Thank you.

Sincerely,



Roland C. Hea, P.E.
Permitting Section Supervisor
Stationary Sources Program
Air Pollution Control Division
APCD-SS-B1

cc: Mr. Matt Burgett – APCD (all cc: via e-mail only)
Mr. Paul Carr – APCD
Mr. R K Hancock III – APCD
Mr. Robert Jorgenson – APCD
Ms. Kirsten King – APCD
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3. A clearly visible permanent label specifying that the inlet air pressure shall not exceed 35 psig is attached to the TE10 air cap on all TEKNA ProLite spray guns used.
4. A clearly visible permanent label identifying the TEKNA ProLite spray gun body is attached to the gun body on all TEKNA ProLite spray guns used.
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Re: Request for RACT Equivalency Determination for DeVilbiss TEKNA Pro Spray Gun with TE20 Air Cap

Dear Mr. Hofert:

The Air Pollution Control Division (the Division) has reviewed your request dated July 26, 2011 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for DeVilbiss Automotive Refinishing's (DeVilbiss's) TEKNA Pro spray gun with TE20 air cap. In your submittal, you provided a copy of a July 20, 2011 Maximum Achievable Control Technology, 40 CFR Part 63, Subpart HHHHHH approval letter from the U.S. Environmental Protection Agency (EPA) as well as the results from a transfer efficiency test. DeVilbiss maintains a list of this and other regulatory agency approval letters on its company web site.

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The results of the transfer efficiency testing included in your transmittal indicate that the DeVilbiss TEKNA Pro spray gun with TE20 air cap is capable (under specified operating parameters) of achieving equivalent or better transfer efficiency than HVLP spray equipment. Based on this review, the Division approves its use under the following conditions:

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2. An appropriate mechanical or digital pressure gauge, supplied by DeVilbiss, is attached to the TEKNA Pro spray gun with TE20 air cap and is in good working condition during actual operation.
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