

January 7, 2009

Mr. Mark E. Charpie Innovations and Regulatory Affairs Manager DeVilbiss Automotive Refinishing 11360 S. Airfield Road Swanton, Ohio 43558

RE: Rule 2.26 Transfer Efficiency Conditional Approval of the ITW Tekna High Efficiency Spray Gun

## Dear Mr. Charpie:

The Yolo-Solano Air Quality Management District (District) has performed a compliance review of your product with the requirements of District Rule 2.26 - Motor Vehicle And Mobile Equipment Coating Operations and has examined the conditional written approval from the South Coast Air Quality Management District (SCAQMD) included with your correspondence.

Rule 2.26, Section 304.5 requires any alternate coating application method achieve a transfer efficiency equivalent to or higher than High-Volume, Low-Pressure (HVLP) spray equipment.

Based on our review of the submitted correspondence and documentation the District agrees that the ITW Tekna High Efficiency spray guns are capable of achieving a transfer efficiency equivalent to or greater than HVLP spray equipment

The District grants conditional approval of the ITW Tekna High Efficiency spray guns for use on any Group I or II vehicle or mobile equipment or their parts or components. This approval is subject to the same conditions outlined in the submitted SCAQMD approval letter dated December 9, 2008 and are repeated below for information:

- 1. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the District that the spray gun is only approved for the application of color coating and clear coatings subject to Rule 2.26.
- 2. This approval is only valid if the air pressure supplied to the ITW Tekna High Efficiency spray gun is equal to or less than 22 psig. DeVilbiss Automotive

Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the District that the maximum air pressure supplied to the spray gun shall not exceed 22 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 ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the District. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed within the District 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 ITW Tekna High Efficiency spray gun is 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 7E7 and that the inlet air pressure shall not exceed 22 psig to all ITW Tekna High Efficiency spray guns sold or distributed for use within the District.
- 6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a Tekna spray gun on all ITW Tekna High Efficiency spray guns sold or distributed for use within the District.
- 7. This approval is only valid if during actual operation the ITW Tekna High Efficiency spray guns are labeled as described in condition numbers 5 and 6.
- 8. This approval is only valid for the ITW Tekna High Efficiency spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the District.

If you have any questions please contact me at (530) 757-3667.

Sincerely,

Susan K. McLaughlin

Supervising Air Quality Engineer