Joint Committee on Administrative Rules
ADMINISTRATIVE CODE

TITLE 35: ENVIRONMENTAL PROTECTION
SUBTITLE B: AIR POLLUTION
CHAPTER I: POLLUTION CONTROL BOARD
SUBCHAPTER c: EMISSIONS STANDARDS AND LIMITATIONS FOR STATIONARY SOURCES
PART 218 ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS FOR THE CHICAGO AREA
SECTION 218.100 INTRODUCTION AND
SECTION 218.784 EQUIPMENT SPECIFICATIONS

Section 218.100 Introduction

a) This Part contains standards and limitations for emissions of organic material and volatile organic material from stationary sources located in the Chicago area, which is comprised of Cook, DuPage, Kane, Lake, McHenry and Will Counties and Aux Sable Township and Goose Lake Township in Grundy County and Oswego Township in Kendall County.

Section 218.784 Equipment Specifications

Every owner or operator of a motor vehicle refinishing operation, unless the source uses less than 20 gallons of coating per calendar year from all motor vehicle refinishing operations combined, shall:

a) Coat motor vehicles, mobile equipment, or their parts and components using one of the following coating applicators:
   1) Electrostatic spray equipment calibrated, operated and maintained in accordance with the manufacturer's specifications;
   2) High Volume Low Pressure (HVLP) spray equipment calibrated, operated and maintained in accordance with the manufacturer's specifications; or
   3) An equivalent coating applicator technology that is demonstrated by the manufacturer to achieve transfer efficiency comparable to the HVLP spray equipment technology listed in subsection (a)(2) of this Section for a comparable operation, and for which written approval has been obtained from USEPA. The owner or operator must maintain documentation of USEPA's approval at the motor vehicle refinishing operation; and

b) Clean all coating applicators with a device that:
   1) Recirculates solvent during the cleaning process;
   2) Collects spent solvent so it is available for disposal or recycling; and
   3) Minimizes evaporation of solvents during cleaning, rinsing, draining, and storage.

(Source: Amended at 37 Ill. Reg. 1669, effective January 28, 2013)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

Mr. Marvin Burns
Senior Project Engineer
DeVilbiss Automotive Refinishing
11360 South Airfield Road
Swanton, Ohio 43558

JUL 20 2011

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. Burns:

This letter is in response to your May 4, 2011, request for approval of the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns, hereinafter referred to as the DeVilbiss spray guns, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns for use when spray applying automotive refinish coatings under subpart HHHHHH of 40 CFR Part 63.

We have completed our review of your reports entitled:

- Final Report; Evaluation of the DeVilbiss Tekna Pro (and Tekna Pro Lite) for use as equivalent technology to HVLP, as defined in 40 CFR 63.11173(e);
- Standard Test Protocol For Demonstrating Equivalency of DeVilbiss Non-HVLP Gravity Feed Spray Guns For EPA approval per 40 CFR 63.11173(e);
- Supplement to the DeVilbiss Automotive Refinishing "Standard Test Protocol for Demonstrating Equivalency of DeVilbiss Non-HVLP Gravity Feed Spray Guns For EPA approval per 40 CFR 63.11173(e)," dated 2/8/11;

The results of the transfer efficiency testing performed indicate that the DeVilbiss spray guns are capable of achieving equivalent or better transfer efficiency than the HVLP spray equipment. As a result, the DeVilbiss spray guns are approved for use in operations subject to §63.11173(e)(3) of 40 CFR part 63 subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions.

1. 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 coatings subject to 40 CFR Part 63 Subpart HHHHHH

2. This approval is only valid for the DeVilbiss spray guns if the air pressure supplied is equal to or less than that stated for each spray gun below:

TEKNA Pro spray gun with TE10 air cap	35 psig
TEKNA ProLite spray gun with TE10 air cap	35 psig
TEKNA Pro spray gun with TE20 air cap	26 psig
TEKNA ProLite spray gun with TE20 air cap	26 psig

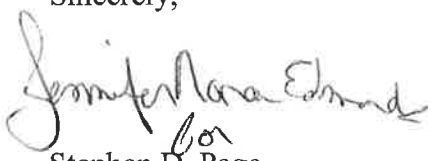
Additionally, DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed the values stated above for each spray gun for the application of coatings subject to 40 CFR part 63 subpart HHHHHH.

3. 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. 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 HHHHHH.

4. This approval is only valid if during actual operation the DeVilbiss spray gun is equipped with a properly operating pressure gauge as described in condition number 3 and operated at or below the operating pressures as listed in condition number 2.

If you have any questions regarding this approval, please contact Kim Teal, of my staff, at (919) 541-5580 or teal.kim@epa.gov.

Sincerely,



Stephen D. Page
Director
Office of Air Quality Planning
and Standards