

2525 Dominic Drive, Suite J
Chico, CA 95928

(530) 891-2882
(530) 891-2878 Fax



W. James Wagoner
Air Pollution Control Officer

Robert McLaughlin
Asst. Air Pollution Control Officer

January 23, 2009

Mark E. Charpie, Regulatory Manager
DeVilbiss Automotive Refinishing
11360 S. Airfield Road
Swanton, OH 43558

RE: Rule 235 Transfer Efficiency Approval for ITW Tekna High Efficiency Spray Gun with #7E7 Air Cap

Dear Mr. Charpie:

The Butte County Air Quality Management District (District) has completed our review of the documentation submitted by DeVilbiss Automotive Refinishing (DVAR) to evaluate the performances of three spray guns for use in the District. The results from the analysis indicate the **ITW Tekna High Efficiency Spray Gun** with 7E7 Air Cap meets the intent and requirements of District Rule 235, Requirements for Vehicle and Mobile Equipment Coating Operations as related to transfer efficiency. As a result, the ITW Tekna High Efficiency Spray Gun is approved for use for operations subject to Rule 235.

This approval is subject to the following conditions:

1. The spray gun is only approved for the application of color or clear coatings subject to Rule 235.
2. DVAR shall supply a 100 psig (full scale) mechanical pressure gauge with markings every 2 psig or a 160 psig (full scale) digital gauge that measures in 1 psig increments.
3. DVAR shall supply each ITW Tekna High Efficiency Spray Gun sold or distributed for use within the jurisdiction of the District with the following written notifications:
 - a. The air pressure supplied to the spray gun shall not exceed 22 psig;
 - b. The pressure gauge shall be attached to the spray gun and in good working condition whenever the spray gun is in operation.
4. DVAR shall add a clearly visible permanent label on the spray gun cap specifying the air cap designation of 7E7 and that the inlet air pressure shall not exceed 22 psig.
5. DVAR shall add a clearly visible permanent label on the spray gun body identifying it as an ITW Tekna High Efficiency Spray Gun.

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6. This approval is only valid if during actual operation:
 - a. The air pressure supplied to the ITW Tekna High Efficiency Spray Gun is equal to or less than 22 psig;
 - b. The ITW Tekna High Efficiency Spray Gun is equipped with a properly operating pressure gauge meeting the criteria above; and
 - c. The spray gun and cap are labeled as required above.

7. This approval is only valid for the ITW Tekna High Efficiency Spray Gun model tested. Any modification to the spray gun, cap, or pressure gauge design shall invalidate this approval unless the modification is approved in writing by the District.

If you have any questions relating to this approval or correspondence, please contact me at (530) 891-2882 ext. 113 or via email at dlusk@bcaqmd.org.

Sincerely,



David J. Lusk
Senior Air Quality Engineer