

STATE OF COLORADO

Bill Ritter, Jr., Governor
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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

April 20, 2009

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

Re: Request for RACT Equivalency Determination for ITW Tekna High Efficiency Spray Gun

Dear Mr. Charpie:

The Air Pollution Control Division (the Division) has reviewed your request dated December 11, 2008 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for DeVilbiss Automotive Refinishing's (DeVilbiss's) ITW Tekna High Efficiency paint spray gun. In your submittal, you provided a copy of an approval letter from the South Coast Air Quality Management District (California) 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 8-Hour Ozone Control Area. The 8-Hour Ozone Control 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 8-Hour Ozone Control 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 ITW Tekna High Efficiency spray gun 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 ITW Tekna High Efficiency spray gun is equal to or less than 22 pounds per square inch gauge (psig).
2. An appropriate mechanical or digital pressure gauge, supplied by DeVilbiss, is attached to the ITW Tekna High Efficiency spray gun and is in good working condition during actual operation.
3. A clearly visible permanent label specifying the air cap designation 7E7 and that the inlet air pressure shall not exceed 22 psig is attached to the air cap on all ITW Tekna High Efficiency spray guns used.
4. A clearly visible permanent label identifying the ITW Tekna spray gun body is attached to the gun body on all ITW Tekna High Efficiency spray guns used.
5. DeVilbiss shall supply written notification to each individual purchasing an ITW Tekna High Efficiency spray gun for use within the 8-Hour Ozone Control 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 ITW Tekna High Efficiency spray gun 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. Paul Carr – APCD (all cc: via e-mail only)
Mr. R K Hancock III – APCD
Mr. Robert Jorgenson – APCD
Ms. Kirsten King – APCD
Ms. Shannon McMillan – APCD