INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr. Governor

Thomas W. Easterly Commissioner

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January 15, 2009

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

> Re: Approval Request ITW Tekna Spray Gun with 7E7 Air Cap

Dear Mr. Charpie:

The Indiana Department of Environmental Management, Office of Air Quality, has reviewed your request for approval of the ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap for the application for the application of coatings in Indiana that are subject to Rule 326 IAC 8-10, Volatile Organic Compound Rule for Automobile Refinishing.

The Indiana Department of Environmental Management, Office of Air Quality, has determined the ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap meets the minimum sixty-five percent (65%) transfer efficiency required by 326 IAC 8-10 when applying clear coatings and color coatings. Therefore, ITW Tekna High Efficiency Spray Gun with 7E7 Air Caps are approved for use under 326 IAC 8-10 subject to the following conditions:

- 1. This approval is granted only for the ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap model tested.
- 2. 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 twenty-two (22) pounds per square inch (psig).
- 3. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body that identifies the gun body as a Tekna spray gun.
- 4. Because the transfer efficiency is dependant on the design configuration of the air passage housing, the air cap and the air inlet, the ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap must be maintained with original manufacturer's parts.
- 5. DeVilbiss Automotive Refinishing shall supply an inlet pressure gauge with each ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap that is subject to Rule 326 IAC 8-10. Pressure gauges with a full-scale reading of one hundred (100) psig or less shall measure pressure in not less than two (2) psig increments. Pressure gauges with a full-scale reading of one hundred sixty (160) psig or less shall measure pressure in not less than one (1) psig increments. The pressure gauge shall clearly identify the maximum allowable spray gun inlet air pressure, which is twenty-two (22) pounds per square inch (psig).
- 6. DeVilbiss Automotive Refinishing shall provide each operator of an ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap that is subject to 326 IAC 8-10 with a copy of this approval letter.

- 7. Each operator shall insure that the air pressure supplied to the ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap does not exceed twenty-two (22) pounds per square inch (psig).
- 8. Each operator shall insure that the inlet air pressure gauge meets all of the following requirements:
 - A. The air pressure gauge is correctly attached to the spray gun and is in proper working condition.
 - B. The air pressure gauge is easily readable at all times.
 - C. The air pressure gauge clearly identifies the maximum allowable spray gun inlet air pressure, which is twenty-two (22) pounds per square inch (psig).
 - D. Pressure gauges with a full-scale reading of one hundred (100) psig or less shall measure pressure in not less than two (2) psig increments. Pressure gauges with a full-scale reading of one hundred sixty (160) psig or less shall measure pressure in not less than one (1) psig increments. Pressure gauges that exceed the respective full-scale readings are not approved.
- 9. Each operator of an ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap shall follow the manufacturer's setup and operation procedures for each ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap system.
- 10. Each operator of an ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap that is subject to 326 IAC 8-10 shall retain a copy of this approval on-site. Additionally, the operator shall maintain on-site, a copy of the original manufacturer's ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap manual, equipment part list, and setup instructions.
- 11. Any modification of the ITW Tekna High Efficiency Spray Gun with 7E7 Air Cap shall invalidate this approval unless the modification has been approved by the Indiana Department of Environmental Management, Office of Air Quality.
- 12. If required to obtain a permit or permit modification under Indiana's Permit Review Rules in 326 IAC 2, the operator shall obtain any necessary permit approvals prior to installing or operating the equipment and must submit a copy of this approval letter with each permit application.

This approval is specific to Volatile Organic Compound Rule for Automobile Refinishing in 326 IAC 8-10. Other state or federal rules may limit the use these spray guns and would require submittal of a separate approval request.

Please direct any response to this letter or any questions to Greg Wingstrom at the above address or via phone at 574/245-4870 or 800/753-5519 in Indiana.

Sincerely,

Phil Perry, Chief

Compliance and Enforcement Branch

Office of Air Quality

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cc: Greg Wingstrom, Northern Regional Office