



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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January 8, 2009

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

Dear Mr. Charpie:

Subject: ITW Tekna High Efficiency Spray Gun

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Prevention, Business Compliance Division has received your request, pursuant to 310 CMR 7.03(16)(d)3, for approval to sell the ITW Tekna High Efficiency spray gun for use in Massachusetts, dated December 11, 2008. 310 CMR 7.03(16)(d)3 allows for the use of "...other coating application method(s) that achieves a transfer efficiency equivalent to electrostatic or HVLP spray application and is approved by the Department in writing."

Review of the submitted information demonstrates that the ITW Tekna High Efficiency spray gun was approved for use in the South Coast Air Quality Management District (SCAQMD) in a letter dated December 9, 2008. The ITW Tekna High Efficiency spray gun was tested according to the following procedures:

1. SCAQMD "Spray equipment Transfer Efficiency Test Procedure For Equipment Users" (May 24, 1989)
2. SCAQMD "Guidelines For Demonstrating Equivalency with District Approved Transfer Efficiency Spray Guns" (September 26, 2002)

Based on the results of SCAQMD testing and SCAQMD's approved use of the ITW Tekna High Efficiency spray gun, you have documented to the satisfaction of MassDEP that the transfer efficiency of the tested model is equal to or greater than high volume-low pressure (HVLP) spray equipment. Therefore, the ITW Tekna High Efficiency spray gun is approved for operations in

Massachusetts, including but not limited to, those subject to 310 CMR 7.03(16) (Plan Application Exemption Requirements for Paint Spray Booths) and 310 CMR 7.18(28) (Automotive Refinishing RACT), provided the following conditions are met:

1. The inlet air pressure supplied to the ITW Tekna High Efficiency spray gun shall not exceed 22 psig.
2. DeVilbiss Automotive Refinishing shall supply with each ITW Tekna High Efficiency spray gun sold or distributed for use within the Commonwealth of Massachusetts written notification that the maximum inlet air pressure supplied shall not exceed 22 psig.
3. DeVilbiss Automotive Refinishing shall supply with each ITW Tekna High Efficiency spray gun 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. DeVilbiss Automotive Refinishing shall supply with each ITW Tekna High Efficiency spray gun sold or distributed for use within Massachusetts written notification 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. 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 will not exceed 22 psig to each ITW Tekna High Efficiency spray gun sold or distributed for use in Massachusetts.
5. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the spray gun body is an ITW Tekna High Efficiency spray gun.

If you have any questions concerning this approval, please contact Paul Reilly of my staff at (617) 556-1097.

Very truly yours,



Steven A. DeGabriele, Director
Business Compliance Division
Bureau of Waste Prevention

cc: BWP, Regional C/E Chiefs
BWP, Regional Permit Chiefs