



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Martin O'Malley
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Lieutenant Governor

Robert M. Summers, Ph.D.
Deputy Secretary

January 21, 2009

DeVilbiss
11360 S. Airfield Rd
Swanton, OH 43558
Attn: Mr. Mark Charpie

Re: ITW Tekna High Efficiency spray gun with a 7E7 air cap

Dear Mr. Charpie;

The Maryland Department of the Environment has determined that the ITW Tekna High Efficiency spray gun with a 7E7 air cap is an acceptable alternative to high-volume, low-pressure (HVLP) spray guns for all VOC coating processes regulated under COMAR 26.11.19. This determination is based on the review of your report "Evaluation of the DeVilbiss CVI, GTI Pro and ITW Tekna High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District (SCAQMD)" dated May 2008 and the SCAQMD letter of December 9, 2008 granting approval of the ITW Tekna High Efficiency spray gun.

This approval is subject to the following conditions:

1. DeVilbiss shall supply with each ITW Tekna spray gun a mounted pressure gauge clearly identifying the maximum allowable inlet air pressure of 22 psi, and a gun mounted air pressure regulating device.
2. DeVilbiss shall add a clearly visible permanent label on the spray gun air cap identifying it as a 7E7.
3. DeVilbiss shall supply with each ITW Tekna spray gun written notification that:
 - a. The maximum air pressure supplied to the spray gun shall not exceed 22 psi, and
 - b. The gun mounted pressure gauge, air pressure regulating device and 7E7 air cap must be attached to the spray gun and be in good working condition whenever the spray gun is in use.

Sincerely,

Nolan E. Penney, Air Toxics Section Head
Air Quality Permits Program
Air And Radiation Management Administration