



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

DIVISION OF ENVIRONMENTAL SAFETY AND HEALTH
Office of Pollution Prevention and Right to Know

MARK N. MAURIELLO
Acting Commissioner

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February 26, 2009

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

Re: Approval of Non-HVLP High Efficiency Spray Guns:
DeVilbiss GTI Pro, DeVilbiss CVI Pro, and ITW Tekna High Efficiency Spray Guns

Dear Mr. Charpie:

The New Jersey Department of Environmental Protection (NJDEP) will allow the use of EPA approved non-HVLP spray guns for surface coating operations at mobile equipment repair and refinishing facilities. In accordance with the volatile organic compound (VOC) rule (N.J.A.C. 7:27-16.12), refinishing facilities can request the use of EPA approved non-HVLP spray guns, which have demonstrated that the VOC emissions do not exceed HVLP or electrostatic spray emissions.

Requests to use EPA approved non-HVLP spray guns must be submitted to the NJDEP's Small Business Assistance Program (SBAP). All submissions must include the following: EPA approval letter; facility contact; facility phone number; and facility location.

When a request to use an EPA approved non-HVLP spray gun is received by the NJDEP the SBAP will send a letter back to the refinishing facility affirming the request. Refinishing facilities must retain a copy of the affirmation letter as proof of complying with N.J.A.C. 7:27-16.12.

If you have any questions regarding this process, please call the SBAP at (609) 292-3600.

Sincerely,

Ky Connor Asral
Supervising Environmental Engineer
Small Business Assistance Program

c: Thomas Morris, Minor Source Enforcement, NJDEP
enc.: Form Letter: Request to use EPA approved non-HVLP spray gun.

Mr. Ky Asral
Supervising Environmental Engineer
New Jersey Department of Environmental Protection
Small Business Assistance Program
PO Box 443
Trenton, NJ 08625-0443

Re: Request to use EPA approved non-HVLP spray gun.

Dear Mr. Asral:

In accordance with N.J.A.C. 7:27-16.12(f)10, I am requesting written affirmation from the NJDEP to use the following EPA approved non-HVLP spray gun at my mobile equipment refinishing facility:

Make & Model of EPA approved non-HVLP spray gun

The VOC emissions resulting from this spray gun for mobile equipment refinishing does not exceed the emissions that would result from either the HVLP or electrostatic spray application methods. Please find the attached EPA approval as evidence that this spray gun meets New Jersey's VOC emission requirements.

Sincerely,

Print Name

Title

Phone Number

Date

Facility Name

Facility Address

Facility Address

Facility Address



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 6, 2009

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

Subject: Conditional Approval of ITW Tekna High Efficiency Spray Gun

Dear Mr. Charpie:

DeVilbiss Automotive Refinishing requested EPA Region 9 approval to sell and operate the ITW Tekna High Efficiency Spray Gun with #7E7 air cap as an alternative spray application method to high-volume low pressure (HVLP) spray equipment. EPA reviewed the following documents to evaluate whether this spray gun was capable of achieving a transfer efficiency which was equivalent to or better than HVLP spray equipment:

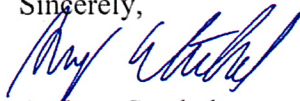
- Various California air district automotive refinishing rules
- South Coast Air Quality Management District (SCAQMD) approval letter for the DeVilbiss ITW Tekna High Efficiency spray gun dated December 9, 2008
- Evaluation of the DeVilbiss CVI, GTI Pro, and ITW Tekna High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District – Final Report (May 2008)
- Raw test data provided by DeVilbiss Automotive Refinishing
- SCAQMD comment letter dated September 23, 2008

Automotive refinishing operations in California are regulated by the individual air district where the coating operations occur. As a result, different requirements may apply in different air districts, thereby affecting the approvability of your spray gun in a particular air district. For example, rules in some air districts allow alternative application methods to HVLP and do not specify a minimum transfer efficiency. Ventura County Air Pollution Control District's Rule 74.18 for Motor Vehicle and Mobile Equipment Coating Operations and the California Air Resources Board's Suggested Control Measure for Automotive Coatings fall into this first category. Rules in other air districts, however, may specify a minimum transfer efficiency that must be met before an alternative application equipment can be approved. For example, Mojave Dessert Air Quality Management District's Rule 1116 Automotive Refinishing Operations and San Joaquin Valley Air Pollution Control District's Rule 4612 Motor Vehicle and Mobile Equipment Coating Operations both specify a minimum 65% transfer efficiency for alternative spray application equipment and would fall into this second category.

5. 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 22 psig to all ITW Tekna High Efficiency spray guns sold or distributed for use within a California air district.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun is a Tekna spray gun on all ITW Tekna High Efficiency spray guns sold or distributed for use within a California air district.
7. This approval is only valid if during actual operation the ITW Tekna High Efficiency spray guns are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the ITW Tekna High Efficiency spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the local air district and EPA Region 9.

Please be aware that some California air districts also require the written approval of the Air Pollution Control Officer before alternative spray application equipment can be used. Please do not hesitate to contact Stanley Tong at (415) 947-4122 if you have any questions regarding this conditional approval.

Sincerely,



Andrew Steckel,
Chief, Rulemaking Office