

New York State Department of Environmental Conservation
Division of Air Resources
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Alexander B. Grannis
Commissioner

February 24, 2009

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

6 NYCRR Part 228
ITW Tekna Spray Gun with 7E7 Air Cap

Dear Mr. Charpie:

The DEC has reviewed your request dated December 11, 2008 and supporting documentation. The results of the transfer efficiency testing performed by Process Technologies Group indicate that the ITW Tekna Spray Gun with 7E7 air cap (ITW Tekna 7E7) is capable of (under specified operating parameters and specified coating applications) achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment (as defined in 6 NYCRR 228.2). Based on this review the DEC approves its use in New York State as provided for under 6 NYCRR 228.3(f)(2)(vii); with the following condition:

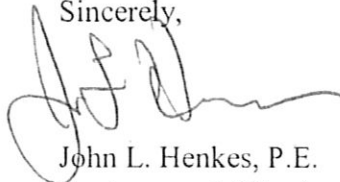
DeVilbiss Automotive Refinishing shall supply written notification to each individual purchasing the ITW Tekna 7E7 for use within New York State, that the gun is only approved for:

- a) use when the air pressure supplied to the ITW Tekna 7E7 is equal to or less than 22 psig. DeVilbiss Automotive Refinishing shall supply 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 with each ITW Tekna 7E7. The pressure gauge must be attached to the gun and in good working order whenever the gun is in use. DeVilbiss Automotive Refinishing will also add a clearly visible permanent label on the spray gun air cap designating the 7E7 model and that the inlet air pressure shall not exceed 22 psig on each ITW Tekna 7E7 sold or distributed for use in New York State.

- b) the application of any "Automotive topcoat" listed under "Mobile equipment repair and refinishing or color-matched coating line" listed in 6 NYCRR 228.8 Table 2;
- c) use as an equivalent application method to high volume low pressure spray or electrostatic spray applications as provided for in 6 NYCRR 228.3(f)(s)(viii);
- d) use when the operator can produce a copy of this letter for inspection by the DEC personnel upon their request; and only for the ITW Tekna Spray Gun with 7E7 air cap model.

If you have any questions regarding this, do not hesitate to contact me.

Sincerely,



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cc: Regional Air Pollution Control Engineers
James Coyle, EFC
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