

# Allegheny County Health Department

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## AIR QUALITY PROGRAM

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March 9, 2009

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

**RE: Formal petition requesting written approval of the use of ITW Tekna Spray Gun with 7E7 air cap in the area.**

Dear Mr. Charpie:

The Department has completed a review of the “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)” procedure, dated May 2008; and the SCAQMD determination letters, dated December 09, 2008 submitted with your request for an equivalency determination.

Based upon the technical information provided by Process Technologies Group (PTW) in their “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, the Department has determined that the ITW Tekna Spray Gun with 7E7 air cap is capable of achieving emission reductions (transfer efficiency) equivalent to the HVLP or electrostatic spray application methods delineated in Article XXI §2105.75, “Mobile Equipment Repair and Refinishing,” effective April 15, 2008. This determination authorizes the use of the ITW Tekna Spray Gun with 7E7 air cap in Allegheny County for the application of coating materials listed in Table 2105.75, subject to the following conditions:

1. DeVilbiss shall supply written notification with the purchase of each ITW Tekna Spray Gun with 7E7 air cap for use within Allegheny County that the Department has determined that this spray gun is *only* equivalent to HVLP or electrostatic spray application methods when applying a coating material delineated in Table §2105.10 of Article XXI.
2. This authorization is valid *only* if the air pressure supplied to the ITW Tekna Spray Gun with 7E7 air cap is equal to or less than 22 psig. DeVilbiss shall supply written notification with the purchase of each ITW Tekna Spray Gun with 7E7 air cap for use in Allegheny county stating that the operation of this spray gun at an air pressure greater than 22 psig for application of coating materials listed in Table 2105.75 of Article XXI constitutes a violation of §2105.75.e.10 of Article XXI.

3. DeVilbiss shall supply a spray gun mounted needle valve and pressure gauge that clearly identifies the maximum allowable spray gun inlet air pressure with the purchase of each ITW Tekna Spray Gun with 7E7 air cap for use in Allegheny County. DeVilbiss shall supply written notification with the purchase of each ITW Tekna Spray Gun with 7E7 air cap stating that failure to have the spray gun mounted needle valve and pressure gauge attached to the spray gun in good working condition whenever the spray gun is in operation constitutes a violation of §2105.75.e.10 of Article XXI.

This authorization is valid only for the ITW Tekna Spray Gun with 7E7 air cap described in the technical information submitted to the Department in DeVilbiss' "Request-for- Determination" on December 11, 2008. In the event that DeVilbiss fails to comply with any of the conditions delineated within the Department's letter, the determination of the ITW Tekna Spray Gun with 7E7 air cap as equivalent to the HVLP and electrostatic spray application methods delineated in §2105.75.e.10 will be considered null and void and the sale of this spray gun within Allegheny County for the application of coating materials delineated in Table 2105.75 of Article XXI to be terminated immediately. If you have any questions regarding this letter, please call me at (412)-578-8366.

Yours very truly,



David D. Good  
Air Pollution Control Engineer II

cc: Document File