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December 11, 2008

The Texas Administrative Code, Title 30, Part 1, Chapter 106, Subchapter S, Rule 106.436 for Auto Body Refinishing Facilities, paragraph 8 states:

"High transfer efficiency coating application equipment shall be used, such as high volume low pressure spray guns. Electrostatic spray guns or other methods, if demonstrated to provide equivalent or better transfer efficiency are acceptable."

The attached approval letter from the South Coast Air Quality Management District verifies that the TEKNA spray gun with the 7E7 air cap and a maximum inlet pressure of 22 PSI has been tested by an independent test lab and found to provide equivalent or better transfer efficiency than the high volume low pressure (HVLP) spray guns that were evaluated.

The Texas Commission on Environmental Quality requires that the spray gun manufacturer make this document available to TEKNA spray gun users. You may be asked to produce this document.

Sincerely,

Mark E. Charpie
Regulatory Affairs Manager
DeVilbiss Automotive Refinishing

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
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December 9, 2008

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

Dear Mr. Charpie:

Subject: Rule 1151 Transfer Efficiency Approval of the ITW Tekna High Efficiency Spray Gun

The South Coast Air Quality Management District has completed our review of your report entitled "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 including the supplemental information submitted electronically on October 22, 2008 in response to our September 23, 2008 request for additional information. The results of the transfer efficiency testing performed indicate that the ITW Tekna High Efficiency spray gun is capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment. As a result, the ITW Tekna High Efficiency spray gun is approved for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, under Rule 1151(d)(7)(A)(iii). This approval is subject to the following conditions.

1. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the spray gun is only approved for the application of color coatings and clear coatings subject to Rule 1151.

2. This approval is only valid if the air pressure supplied to the ITW Tekna High Efficiency spray gun is equal to or less than 22 psig. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the maximum air pressure supplied to the spray gun shall not exceed 22 psig.

3. 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

High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District. DeVilbiss Automotive Refinishing shall supply written notification with each ITW Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District 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. This approval is only valid if during actual operation the ITW Tekna High Efficiency spray gun is equipped with a properly operating pressure gauge that meets the criteria specified in condition no. 3.

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 the South Coast Air Quality Management District.

6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a Tekna spray gun on all ITW Tekna High Efficiency spray guns sold or distributed for use within the South Coast Air Quality Management 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 South Coast Air Quality Management District.

If you have any questions regarding this approval, please call me at (909) 396-2576 or send me an e-mail at flettice@aqmd.gov.

Sincerely,

Fred Lettice
Senior Manager
Coating, Printing, Aerospace &
Metal Finishing Operations

FEL:EVQ