



## State of New Jersey

### DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mail Code: 401-07E

Economic Growth & Green Energy

401 East State Street, 7<sup>th</sup> Floor

PO Box 402

Trenton, New Jersey 08625-0402

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

BOB MARTIN  
*Commissioner*

August 12, 2011

William J. Hofert  
Controller and Acting Regulatory Manager  
DeVilbiss Automotive Refinishing  
11360 S. Airfield Road  
Swanton, OH 43558

Re: Approval of Non-HVLP High Efficiency Spray Guns:

TEKNA Pro with TE10 air cap at 35PSIG, TEKNA ProLite with TE10 air cap at 35PSIG,  
TEKNA Pro with TE20 air cap at 26PSIG, TEKNA ProLite with TE20 air cap at 26PSIG,

Dear Mr. Hofert:

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) 777-0319.

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 402  
Trenton, NJ 08625-0402

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:

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*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,

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*Print Name*

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*Title*

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*Phone Number*

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*Date*

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*Facility Name*

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*Facility Address*

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*Facility Address*

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*Facility Address*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

Mr. Marvin Burns  
Senior Project Engineer  
DeVilbiss Automotive Refinishing  
11360 South Airfield Road  
Swanton, Ohio 43558

JUL 20 2011

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Mr. Burns:

This letter is in response to your May 4, 2011, request for approval of the DeVilbiss TEKNA Pro and TEKNA Pro Lite spray guns, hereinafter referred to as the DeVilbiss spray guns, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns for use when spray applying automotive refinish coatings under subpart HHHHHH of 40 CFR Part 63.

We have completed our review of your reports entitled:

- Final Report; Evaluation of the DeVilbiss Tekna Pro (and Tekna Pro Lite) for use as equivalent technology to HVLP, as defined in 40 CFR 63.11173(e);
- Standard Test Protocol For Demonstrating Equivalency of DeVilbiss Non-HVLP Gravity Feed Spray Guns For EPA approval per 40 CFR 63.11173(e);
- Supplement to the DeVilbiss Automotive Refinishing “Standard Test Protocol for Demonstrating Equivalency of DeVilbiss Non-HVLP Gravity Feed Spray Guns For EPA approval per 40 CFR 63.11173(e),” dated 2/8/11;

The results of the transfer efficiency testing performed indicate that the DeVilbiss spray guns are capable of achieving equivalent or better transfer efficiency than the HVLP spray equipment. As a result, the DeVilbiss spray guns are approved for use in operations subject to §63.11173(e)(3) of 40 CFR part 63 subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions.

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the spray gun is approved as providing equivalent transfer efficiency as HVLP spray guns for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH
2. This approval is only valid for the DeVilbiss spray guns if the air pressure supplied is equal to or less than that stated for each spray gun below:

TEKNA Pro spray gun with TE10 air cap	35 psig
TEKNA ProLite spray gun with TE10 air cap	35 psig
TEKNA Pro spray gun with TE20 air cap	26 psig
TEKNA ProLite spray gun with TE20 air cap	26 psig

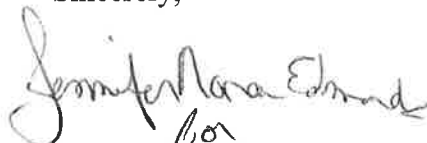
Additionally, DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed the values stated above for each spray gun for the application of coatings subject to 40 CFR part 63 subpart HHHHHH.

3. DeVilbiss Automotive Refinishing shall supply an appropriate pressure gauge to allow precise measurement of the inlet air pressure, reflecting the maximum air pressure for the specific gun, with each DeVilbiss spray gun sold or distributed for the application of coatings subject to 40 CFR part 63 subpart HHHHHH. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss spray gun sold or distributed that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation for the application of coatings subject to 40 CFR part 63 subpart HHHHHH.

4. This approval is only valid if during actual operation the DeVilbiss spray gun is equipped with a properly operating pressure gauge as described in condition number 3 and operated at or below the operating pressures as listed in condition number 2.

If you have any questions regarding this approval, please contact Kim Teal, of my staff, at (919) 541-5580 or teal.kim@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephen D. Page".

Stephen D. Page

Director

Office of Air Quality Planning  
and Standards