

New York State Department of Environmental Conservation

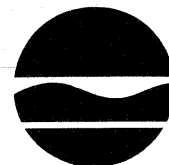
Division of Air Resources

Bureau of Stationary Sources, 2nd Floor

625 Broadway, Albany, New York 12233-3254

Phone: (518) 402-8403 • FAX: (518) 402-9035

Website: www.dec.ny.gov



Joe Martens
Commissioner

September 22, 2011

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

Dear Mr. Hofert:

6 NYCRR Part 228
Approval of DeVilbiss TEKNA Pro and Prolight Spray Guns for
HVLP Equivalence per 6 NYCRR Part 228-1(f)(2)(ii)

The New York State Department of Environmental Conservation (DEC) has reviewed your request dated July 26, 2011 and supporting document (Final Report; Evaluation of Devilbiss Tekna Pro (and ProLite) for use as equivalent technology to HVLP, as defined in 40 CFR 63.11173(e)). The results of transfer efficiency testing indicate that the DeVilbiss TEKNA Pro and Prolight spray guns are capable of (under specified operating parameters) achieve equivalent or better transfer efficiency than typical 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 conditions:

Devilbiss Automotive Refinishing shall supply each dealership within New York State performing coating operations under 6 NYCRR Part 228 with the specified equipment, a copy of this letter and written notification; to be retained by the dealership and produced for inspection by any NYSDEC personnel upon their request; that the spray guns are only approved when:

- a) The air pressure supplied to each spray gun with corresponding air cap is equal to or less than as follows:

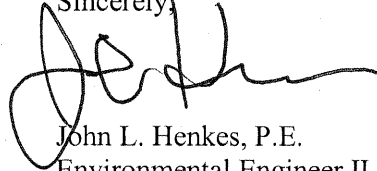
TEKNA Pro spray gun with TE 10 air cap	35 psig
TEKNA ProLight spray gun with TE 10 air cap	35 psig
TEKNA Pro spray gun with TE 20 air cap	26 psig
TEKNA ProLight spray gun with TE 20 air cap	26 psig

- b) Devilbiss Automotive Refinishing supplies an appropriate pressure gauge to allow precise measurement of the inlet air pressure, reflecting the maximum air pressure for the specified gun sold or distributed in New York State; and the gauge is attached to the spray gun and in good working condition whenever in use.

- c) The approved TEKNA Pro and ProLight spray guns with specified air caps are used. Any modification of the spray guns, air caps or pressure gauge shall invalidate this approval.

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

Sincerely,



John L. Henkes, P.E.
Environmental Engineer II
Bureau of Stationary Sources
Division of Air Resources
jlhenkes@gw.dec.state.ny.us

cc: Robert Stanton
Regional Air Pollution Control Engineers
Harry Ching, EFC