



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

February 22, 2012

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

Subject: Written Approval to use DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the **TE10** air cap under Regulation 8, Rule 45: Motor Vehicle and Mobile Equipment Coating Operations

Dear Mr. Hofert:

The Bay Area Air Quality Management District (District) has completed our review of your July 26, 2011 petition and supporting documents requesting approval to use DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the **TE10** air cap within the District's jurisdiction. The supporting documents considered in this review included approval letters from the:

- US EPA dated July 20, 2011, which approved the subject spray guns for use when applying automotive refinish coatings under Subpart HHHHHH of 40 CFR Part 63; and
- South Coast Air Quality Management District (SCAQMD) dated September 8, 2011, which approved using the subject spray guns for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations.

Based on the written approvals of the US EPA and the SCAQMD of the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE10** air cap, you have demonstrated to the satisfaction of the District that these spray guns are capable (under specific operating conditions) of achieving equivalent or better transfer efficiency as high-volume, low-pressure spray equipment. As a result, this letter shall serve to grant written approval under Regulation 8, Rule 45, Section 303.3 to use DeVilbiss TEKNA Pro and ProLite spray guns with the **TE10** air cap for coating operations subject to District Regulation 8-45. This approval is subject to the following conditions:

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and ProLite spray gun with the **TE10** air cap sold or distributed for use within the District jurisdiction that the gun is only approved for the application of coatings subject to Regulation 8-45: Motor Vehicle and Mobile Equipment Coating Operations.
2. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE10** air cap is equal to or less than 35 psig. Any exceedance of this operating pressure will constitute a violation of Regulation 8, Rule 45, Section 303.3. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss Tekna Pro and ProLite spray gun with the **TE10** air cap sold or distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun shall not exceed 35 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 DeVilbiss TEKNA Pro and ProLite spray gun with the **TE10** air cap sold or distributed for use within the jurisdiction of the District. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and ProLite spray gun with the **TE10** air cap sold or distributed for use within

Spare the Air

The Air District is a Certified Green Business

Printed using soy-based inks on 100% post-consumer recycled content paper



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

February 22, 2012

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

Subject: Written Approval to use DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the **TE20** air cap under Regulation 8, Rule 45: Motor Vehicle and Mobile Equipment Coating Operations

Dear Mr. Hofert:

The Bay Area Air Quality Management District (District) has completed our review of your July 26, 2011 petition and supporting documents requesting approval to use DeVilbiss TEKNA Pro and TEKNA ProLite spray guns with the **TE20** air cap within the District's jurisdiction. The supporting documents considered in this review included approval letters from the:

- US EPA dated July 20, 2011, which approved the subject spray guns for use when applying automotive refinish coatings under Subpart HHHHHH of 40 CFR Part 63; and
- South Coast Air Quality Management District (SCAQMD) dated September 8, 2011, which approved using the subject spray guns for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations.

Based on the written approvals of the US EPA and the SCAQMD of the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE20** air cap, you have demonstrated to the satisfaction of the District that these spray guns are capable (under specific operating conditions) of achieving equivalent or better transfer efficiency as high-volume, low-pressure spray equipment. As a result, this letter shall serve to grant written approval under Regulation 8, Rule 45, Section 303.3 to use DeVilbiss TEKNA Pro and ProLite spray guns with the **TE20** air cap for coating operations subject to District Regulation 8-45. This approval is subject to the following conditions:

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and ProLite spray gun with the **TE20** air cap sold or distributed for use within the District jurisdiction that the gun is only approved for the application of coatings subject to Regulation 8-45: Motor Vehicle and Mobile Equipment Coating Operations.
2. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE20** air cap is equal to or less than 26 psig. Any exceedance of this operating pressure will constitute a violation of Regulation 8, Rule 45, Section 303.3. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss Tekna Pro and ProLite spray gun with the **TE20** air cap sold or distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun shall not exceed 26 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 DeVilbiss TEKNA Pro and ProLite spray gun with the **TE20** air cap sold or distributed for use within the jurisdiction of the District. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and ProLite spray gun with the **TE20** air cap sold or distributed for use within

Spare the Air

The Air District is a Certified Green Business

Printed using soy-based inks on 100% post-consumer recycled content paper

the jurisdiction of the 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. Any deviation from this requirement will constitute a violation of Regulation 8, Rule 45, Section 303.3.

4. This approval is only valid if during actual operation the DeVilbiss TEKNA Pro and ProLite spray gun with the **TE20** air cap are equipped with a properly operating pressure gauge that meets the criteria specified in condition number 3.
5. Devilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation **TE20** and that the inlet air pressure shall not exceed 26 psig to all DeVilbiss TEKNA Pro and ProLite spray guns sold or distributed for use within the District.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss TEKNA Pro or ProLite spray gun on all DeVilbiss TEKNA Pro and ProLite spray guns sold or distributed for use within the District.
7. This approval is only valid if during actual operations the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE20** air cap are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE20** air cap model tested and shall not release any user from compliance with any other District rule or regulation, nor absolve any prior or subsequent violations. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the District.

If you have any questions regarding this approval, please contact Douglas Tolar, Senior Air Quality Specialist at (415) 749-5118 or dtolar@baaqmd.gov.

Sincerely,



Brian Bateman
Director of Compliance and Enforcement

BB:det

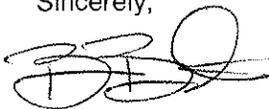
Letter to William J. Hofert
DeVilbiss Automotive Refinishing
February 22, 2012
Page 2

the jurisdiction of the 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. Any deviation from this requirement will constitute a violation of Regulation 8, Rule 45, Section 303.3.

4. This approval is only valid if during actual operation the DeVilbiss TEKNA Pro and ProLite spray gun with the **TE10** air cap are equipped with a properly operating pressure gauge that meets the criteria specified in condition number 3.
5. Devilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation **TE10** and that the inlet air pressure shall not exceed 35 psig to all DeVilbiss TEKNA Pro and ProLite spray guns sold or distributed for use within the District.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss TEKNA Pro or ProLite spray gun on all DeVilbiss TEKNA Pro and ProLite spray guns sold or distributed for use within the District.
7. This approval is only valid if during actual operations the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE10** air cap are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss TEKNA Pro and ProLite spray guns with the **TE10** air cap model tested and shall not release any user from compliance with any other District rule or regulation, nor absolve any prior or subsequent violations. Any modification of the spray gun or pressure gauge design shall invalidate this approval unless the modification is approved by the District.

If you have any questions regarding this approval, please contact Douglas Tolar, Senior Air Quality Specialist at (415) 749-5118 or dtolar@baaqmd.gov.

Sincerely,



Brian Bateman
Director of Compliance and Enforcement

BB:det