Ohio | Environmental Protection Agency
John Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

SEP 1 3 2011

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

Re: DeVilbiss TEKNA ProLite gun with TE20 air cap transfer efficiency vs HVLP

Dear Mr. Hofert;

This letter is in response to your letter dated July 26, 2011, in which you requested written approval to sell and operate the DeVilbiss TEKNA ProLite spray gun with TE20 air cap in Ohio pursuant to Ohio Administrative Code (OAC) 3745-21-1 8(C)(l)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your letter, the supporting test documentation included in your letter and the approval letter from the U.S. EPA Office of Air Quality Planning and Standards dated July 20, 2011.

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected County*, specified in OAC rule 3745-27-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(l)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. Environmental Protection agency, as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted indicates that the DeVilbiss TEKNA ProLite spray gun with TE20 air cap is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as found in the U.S. EPA approval letter) and shall apply to any equipment sold and operated in the affected counties in Ohio:

a. DeVilbiss Automotive Refinishing shall supply written notification with each

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DeVilbiss TEKNA ProLite spray gun with TE20 air cap spray gun sold or distributed for use within the jurisdiction of the affected counties in Ohio that the spray gun is only approved as providing equivalent transfer efficiency as HVLP spray guns for the application of color coatings and clear coatings subject to OAC Chapter 3745-21-18.

b. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA ProLite spray gun with TE20 air cap is equal to or less than 26 psig. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA ProLite spray gun with TE20 air cap sold or distributed for use within the jurisdiction of the affected counties in Ohio that the maximum air pressure supplied to the spray gun shall not exceed 26 psig.

c. DeVilbiss Automotive Refinishing shall supply an appropriate pressure gauge to allow precise measurement of the inlet air pressure, reflecting the maximum air pressure for this specific gun, with each DeVilbiss TEKNA ProLite spray gun with TE20 air cap sold or distributed for use within the jurisdiction of the affected counties in Ohio. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA ProLite spray gun with TE20 air cap sold or distributed for use within the jurisdiction of the affected counties in Ohio 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 the coatings subject to OAC Chapter 3745-21-18.

d. This approval is only valid if during actual operation the DeVilbiss TEKNA ProLite spray gun with TE20 air cap is equipped with a properly operating pressure gauge that meets the criteria specified in condition (c) and operated at or below the operating pressure as specified in condition (b).

* In the Cincinnati and Dayton metropolitan areas; Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren Counties. In the Cleveland metropolitan areas; Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage and Summit Counties.

By means of this letter I am approving the use of the DeVilbiss TEKNA ProLite spray gun with TE20 air cap as an equivalent coating application method. Ohio EPA, as time allows, will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method and will submit the modified rule to the U.S. EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a link on our website for this rule which will indicate that this spray gun has been approved as an equivalent method to HVLP.

Hofert approval

If you have any additional questions, please call Lee F. Burkleca at 614-728-1 344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,

Scott J. Nally
Director, Ohio EPA

Cc: Lee Burkleca, DAPC
Jennifer Hunter, DAPC