



February 25, 2009

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

Subject: **Rule 459 Transfer Efficiency Approval of ITW Tekna High Efficiency Spray Gun**

Dear Mr. Charpie:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your December 11, 2008 petition requesting approval of the Tekna High Efficiency Spray Gun with 7E7 air cap. This review included submitting your request to the United States Environmental Protection Agency Region 9 (EPA) for approval as required by SMAQMD Rule 459, *Automotive, Truck and Heavy Equipment Refinishing Operations*.

On February 6, 2009, EPA granted conditional approval of the spray gun for use in the SMAQMD. A copy of EPA's approval letter is enclosed. . Based on the information you submitted and EPA's approval, the SMAQMD hereby grants conditional approval of the Tekna High Efficiency Spray Gun with 7E7 air cap for use in the SMAQMD. 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 SMAQMD that the spray gun is only approved for the application of color and clear coatings subject to Rule 459.
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 SMAQMD 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 SMAQMD. 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 SMAQMD 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 SMAQMD.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun is a Tekna spray gun on all ITW Tekna High Efficiency spray guns sold or distributed for use within the SMAQMD.
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 SMAQMD and EPA

If you have any questions concerning this matter, feel free to contact Patrick Tedeschi of my staff at (916) 874-4864.

Sincerely,



Larry Greene
Air Pollution Control Officer

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Enclosure