

December 9, 2008

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

Dear Mr. Charpie:

Subject: Rule 1151 Transfer Efficiency Approval of the ITW Tekna High Efficiency

Spray Gun

The South Coast Air Quality Management District has completed our review of your report entitled "Evaluation of the DeVilbiss CVI, GTI Pro, and ITW Tekna High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District (SCAQMD)" dated May 2008 including the supplemental information submitted electronically on October 22, 2008 in response to our September 23, 2008 request for additional information. The results of the transfer efficiency testing performed indicate that the ITW Tekna High Efficiency spray gun is capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment. As a result, the ITW Tekna High Efficiency spray gun is approved for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, under Rule 1151(d)(7)(A)(iii). 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 South Coast Air Quality Management District that the spray gun is only approved for the application of color coatings and clear coatings subject to Rule 1151.
- 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 South Coast Air Quality Management District 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 South Coast Air Quality Management District. 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 South Coast Air Quality Management 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.

- 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 South Coast Air Quality Management District.
- 6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a Tekna spray gun on all ITW Tekna High Efficiency spray guns sold or distributed for use within the South Coast Air Quality Management District.
- 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 South Coast Air Quality Management District.

If you have any questions regarding this approval, please call me at (909) 396-2576 or send me an e-mail at flettice@aqmd.gov.

Sincerely,

Fred Lettice /S Senior Manager Coating, Printing, Aerospace & Metal Finishing Operations