



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

December 14, 2020

Mr. Ray Reitz, Engineer
Carlisle Fluid Technologies
320 Phillips Avenue
Toledo, OH 43612

Dear Mr. Reitz:

This letter is in response to your request for approval of the DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray gun, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns, for use when spray applying automotive refinish coatings under Clean Air Act regulations, subpart HHHHHH of 40 Code of Federal Regulations (CFR) Part 63. These spray guns are approved, with the conditions outlined below, for operations subject to the regulations cited below.

In order to approve this request, the following documents were reviewed:

- Carlisle Fluid Technologies (CFT) Tekna Clearcoat Transfer Efficiency, Final Report, May 8, 2019
- South Coast Air Quality Management District, Application No. 606173, Rule 1151 Transfer Efficiency Approval of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency, September 4, 2020
- DeVilbiss Brochure, Digital Gauge with Air Adjusting Valve, p. 46, www.autorefinishdevilbiss
- PROLite Clear Coat Marking Specifications for model DTA-832
- Gun Body Markings for 905045 only document
- Carlisle Fluid Technologies Service Manual, DeVilbiss Automotive Refinishing, PROLite HVLP or High Efficiency-Gravity Spray Gun (SB-E-2-996 R1.0)
- DeVilbiss/Carlisle Fluid Technologies Operation Manual - Digital Spray gun Pressure Gauge for TEKNA Spray Guns (SB-E-9-222), January 2018

The results of the transfer efficiency testing performed indicate that DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray guns can achieve equivalent or better transfer efficiency than HVLP spray equipment. As a result, the DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray guns are approved for operations subject to §63.11173(e)(3) of 40 CFR Part 63 Subpart

HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions:

1. Carlisle Fluid Technologies shall supply written notification with each DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray gun sold or distributed that the spray gun is approved as providing equivalent transfer efficiency as HVLP spray guns for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.
2. This approval is only valid if the air pressure supplied to the DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray gun is equal to or less than 26 psi. Carlisle Fluid Technologies shall supply written notification with each DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 26 psi for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.
3. Carlisle Fluid Technologies shall supply a digital gauge model HAV-555 with an air adjusting valve measuring 1 psi increments and pressure gauge range of 2.5–160 psi; or a mechanical gauge model HAV-512 with markings every 2 psi and pressure gauge range of 0–100 psi; or a digital pressure gauge model DIGI PRO-504-PSI, measuring 1 psi increments, with each DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) for each spray gun sold or distributed. For compliance, the TE25 air cap shall only be used for the application of clearcoats and the inlet pressure must not exceed 26 psi. Carlisle Fluid Technologies shall provide written notification to buyers/users that the DeVilbiss PROLite Clearcoat TE25 high efficiency air cap (non-HVLP) spray gun must be equipped with a properly operating gauge as described herein, and must be operated at less than or equal to 26 psi when used for applying coatings subject to 40 CFR Part 63 Subpart HHHHHH.

The written notification requirements outlined in this letter may be fulfilled by including a copy of this approval letter with the documentation provided to the purchaser of the spray gun. If you have any questions regarding this approval, please contact Kaye Whitfield, of my staff, at (919) 541-2509 or whitfield.kaye@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Tsirigotis". The signature is fluid and cursive, with the first name "P." and last name "Tsirigotis" clearly distinguishable.

Peter Tsirigotis,
Director