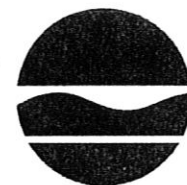


New York State Department of Environmental Conservation
Division of Air Resources
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625 Broadway, Albany, New York 12233-3254
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Alexander B. Grannis
Commissioner

February 24, 2009

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

6 NYCRR Part 228
DeVilbiss CVI Spray Gun with #510 Air Cap

Dear Mr. Charpie:

The DEC has reviewed your request dated December 11, 2008 and supporting documentation. The results of the transfer efficiency testing performed by Process Technologies Group indicate that the DeVilbiss CVI Spray Gun with #510 air cap is capable of (under specified operating parameters and specified coating applications) achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment (as defined in 6 NYCRR 228.2). Based on this review, the DEC approves its use in New York State as provided for under 6 NYCRR 228.3(f)(2)(vii); with the following condition:

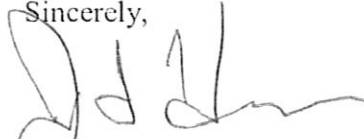
DeVilbiss Automotive Refinishing shall supply written notification to each individual purchasing the DeVilbiss CVI Spray Gun with #510 air cap (DeVilbiss CVI) for use within New York State, that the gun is only approved for:

- a) use when the air pressure supplied to the DeVilbiss CVI is equal to or less than 26 psig. 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 CVI. The pressure gauge must be attached to the gun and in good working order whenever the gun is in use. DeVilbiss Automotive Refinishing will also add a clearly visible permanent label on the spray gun air cap designating the 510 model and that the inlet air pressure shall not exceed 26 psig on each DeVilbiss CVI sold or distributed for use in New York State.

- b) the application of any "Automotive topcoat" listed under "Mobile equipment repair and refinishing or color-matched coating line" listed in 6 NYCRR 228.8 Table 2 ;
- c) use as an equivalent application method to high volume low pressure spray or electrostatic spray applications as provided for in 6 NYCRR 228.3(f)(s)(viii);
- d) use when the operator can produce a copy of this letter for inspection by NYSDEC personnel upon their request; and only for the DeVilbiss CVI Spray Gun with #510 air cap model.

If you have any questions regarding this, do not hesitate to contact me.

Sincerely,



John L. Henkes, P.E.
Environmental Engineer II
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Division of Air Resources
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cc: Regional Air Pollution Control Engineers
James Coyle, EFC
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