



# Oregon

Theodore Kulongoski, Governor

## Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4<sup>th</sup> Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

January 9, 2009

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

Re: Transfer Efficiency Approval of the Devilbiss CVI High Efficiency Spray Gun

Dear Mr. Charpie:

On December 15, 2008, the Oregon Department of Environmental Quality (Department) received your letter requesting approval to market the Devilbiss CVI spray gun for use in Oregon. You state in your letter that this is not a HVLP gun but has proven to provide equivalent transfer efficiency to HVLP guns when tested by an independent lab.

You enclosed a copy of the final lab report and a copy of an approval letter from California's South Coast Air Quality Management District (SCAQMD). SCAQMD reviewed the documentation and stated in their December 9, 2008 letter to you that the results of the transfer efficiency testing performed indicated that the Devilbiss CVI spray gun is capable of achieving equivalent or better transfer efficiency than high-volume, low pressure spray equipment and was approved for automotive refinishing coating applications only, pursuant to SCAQMD Rule 1151(d)(7)(A)(iii). SCAQMD's approval is subject to eight conditions outlined in the December 9, 2009 approval letter.

Oregon Administrative Rule (OAR) 340-242-0620(2)(h) allows for coating application methods which can be demonstrated to effectively control VOC emissions, and which has been approved in writing by the Department. Review of the above referenced information submitted to the Department and subsequent conversation with SCAQMD indicates that the Devilbiss CVI spray gun is equivalent to other approved HVLP spray guns. Therefore, the Department finds that the Devilbiss CVI spray gun meets the requirements of OAR 340-242-0620(2)(h). Use of this equipment by auto body paint shops in the Portland Air Quality Maintenance Area for spray coating application is allowable, subject to the operating conditions outlined in SCAQMD's 12/09/08 approval letter.

If you have additional questions, please contact Nancy Cardwell (503) 229-6610.

Sincerely,

Cory-Ann Wind  
Air Quality Manager  
Northwest Region