



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

July 20, 2009

Mark E. Charpie
Regulatory Manager
DeVilbiss Automotive Refinishing
11360 S. Airfield Rd.
Swanton, OH 43588

Dear Mr. Charpie:

Re: Use of the DeVilbiss CVI Spray Gun with #510 air cap in Rhode Island automobile refinishing facilities.

The Rhode Island Department of Environmental Management's Office of Air Resources' (OAR) has reviewed the information contained in a submittal by DeVilbiss Automotive Refinishing, including a "Final Report" prepared by Process Technologies Group (Project 08-02, dated May 2008) and a letter from the SCAQMD, for the approved use of the DeVilbiss CVI Spray Gun. Air Pollution Control Regulation No. 30 "Control of Volatile Organic Compounds from Automobile Refinishing Operations", specifically section 30.4 *Equipment Specifications*, requires that persons engaging in automobile refinishing, specifically the application of coatings with a spray gun, utilize ... *electrostatic application equipment (30.4.1(a))*, ... *High Volume Low Pressure(HVLP) spray equipment (30.4.1(b))*, or ... *another type of application which achieves a transfer efficiency of at least 65% and has been approved by the Director(30.4.1(c))*. Based on the review of the information submitted the OAR has determined that the DeVilbiss CVI Spray Gun has a demonstrated a transfer efficiency greater than or equal to 65% only when applying clearcoats. Therefore the use of the DeVilbiss CVI Spray Gun is approved by the Director, only for its use in applying clearcoats in automobile spray coatings operations, when used as follows:

1. The DeVilbiss CVI spray gun is only approved for the application of clearcoats in automobile refinishing facilities in RI.
2. This approval is only valid if the air pressure supplied to the DeVilbiss CVI spray gun is equal to or less than 26 psig. DeVilbiss Automotive Refinishing shall

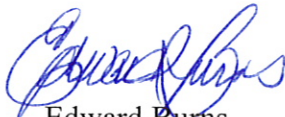


supply written notification with each DeVilbiss CVI spray gun sold or distributed for use within RI that the maximum air pressure supplied to the spray gun shall not exceed 26 psig.

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 DeVilbiss CVI spray gun sold or distributed for use within RI. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss CVI spray gun sold or distributed for use within RI 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 DeVilbiss CVI spray gun is equipped with a properly operating pressure gauge that meets the criteria specified in condition no. 3.
5. All DeVilbiss CVI spray guns sold or distributed for use within RI shall have a clearly visible permanent label on the spray gun air cap that specifies the air cap designation as #510 and that the inlet air pressure shall not exceed 26 psig .
6. All DeVilbiss CVI spray guns sold or distributed for use within RI shall have a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss CVI spray gun.
7. This approval is only valid if during the actual operation the DeVilbiss CVI spray guns are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss CVI spray gun model tested.

If you have any questions regarding this approval, please call me at (401) 222-2808 ext. 7013 or send me an e-mail at ted.burns@dem.ri.gov.

Sincerely,



Edward Burns

Supervising Air Quality Specialist
RIDEM, Office of Air Resources

cc: Ronald Gagnon, Chief, RIDEM, Office of Customer and Technical Assistance