

February 25, 2009

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

Subject: **Rule 459 Transfer Efficiency Approval of DeVilbiss CVI High Efficiency Spray Gun**

Dear Mr. Charpie:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your December 11, 2008 petition requesting approval of the DeVilbiss CVI High Efficiency Spray Gun with #510 air cap. This review included submitting your request to the United States Environmental Protection Agency Region 9 (EPA) for approval as required by SMAQMD Rule 459, *Automotive, Truck and Heavy Equipment Refinishing Operations*.

On February 6, 2009, EPA granted conditional approval of the spray gun for use in the SMAQMD. A copy of EPA's approval letter is enclosed. . Based on the information you submitted and EPA's approval, the SMAQMD hereby grants conditional approval of the DeVilbiss CVI High Efficiency Spray Gun with #510 air cap for use in the SMAQMD. This approval is subject to the following conditions.

1. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss CVI High Efficiency spray gun sold or distributed for use within the jurisdiction of the SMAQMD that the spray gun is only approved for the application of color and clear coatings subject to Rule 459.
2. This approval is only valid if the air pressure supplied to the DeVilbiss CVI High Efficiency spray gun is equal to or less than 26 psig. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss CVI High Efficiency spray gun sold or distributed for use within the jurisdiction of the SMAQMD 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 High Efficiency spray gun sold or distributed for use within the jurisdiction of the SMAQMD. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss CVI High Efficiency spray gun sold or distributed for use within the jurisdiction of the SMAQMD 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 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 510 and that the inlet air pressure shall not exceed 26 psig to all DeVilbiss CVI High Efficiency spray guns sold or distributed for use within the SMAQMD.
6. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun is a DeVilbiss CVI spray gun on all DeVilbiss CVI High Efficiency spray guns sold or distributed for use within the SMAQMD.
7. This approval is only valid if during actual operation the DeVilbiss CVI High Efficiency spray guns are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss CVI 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 SMAQMD and EPA

If you have any questions concerning this matter, feel free to contact Patrick Tedeschi of my staff at (916) 874-4864.

Sincerely,



Larry Greene
Air Pollution Control Officer

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Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 6, 2009

Mr. Patrick Tedeschi
Program Coordinator, Field Operations
Sacramento Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814

Subject: Conditional Approval of DeVilbiss CVI High Efficiency Spray Gun

Dear Mr. Tedeschi:

Sacramento Air Quality Management District (SMAQMD) requested EPA Region 9 approval for the DeVilbiss CVI High Efficiency Spray Gun with #510 air cap as an alternative spray application method in accordance with District Rule 459 Automotive, Truck and Heavy Equipment Refinishing Operations. In support of this effort, EPA reviewed the following documents to evaluate whether this spray gun was capable of achieving a transfer efficiency which was equivalent to or better than high-volume low pressure (HVLP) spray equipment:

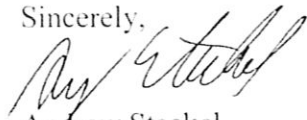
- SMAQMD Rule 459 (Amended 10/2/1997)
- South Coast Air Quality Management District (SCAQMD) approval letter for the DeVilbiss CVI High Efficiency Spray Gun dated 12/9/2008
- Evaluation of the DeVilbiss CVI, GTI Pro, and ITW Tekna High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District – Final Report (May 2008)
- Raw test data provided by DeVilbiss Automotive Refinishing
- SCAQMD comment letter dated September 23, 2008

SMAQMD Rule 459, section 303.1 states that a person shall not apply any coating to any Group I or Group II vehicles or their parts and components unless HVLP spray equipment or one of three other application methods specified in section 303.1 is used. This section further states that other equivalent methods which have been approved in writing by the Air Pollution Control Officer (APCO) and submitted to and approved by the U.S. EPA may be used.

Based on our review of the above test report, the South Coast AQMD approval letter and the supplemental materials, EPA agrees the DeVilbiss CVI High Efficiency spray gun with #510 air cap is capable of achieving equivalent or better transfer efficiency than HVLP spray equipment for the application of color and clear coatings and can be used as an alternative application equipment under SMAQMD Rule 459.

Section 303.1e of Rule 459 also requires written approval of the Air Pollution Control Officer before alternative spray application equipment can be used in the SMAQMD. Please do not hesitate to contact Stanley Tong at (415) 947-4122 if you have any questions regarding this conditional approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Steckel". The signature is written in a cursive style with a large initial "A".

Andrew Steckel,
Chief, Rulemaking Office