



**AIR POLLUTION
CONTROL DISTRICT**
COUNTY OF SAN LUIS OBISPO

February 19, 2009

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

SUBJECT: Non-HVLP Spray Guns, DeVilbiss CVI and GTI and ITW Tekna Spray Guns.

Dear Mr. Charpie:

You have requested pre-approval of the DeVilbiss CVI Spray Gun with #510 air cap, ITW Tekna Spray Gun with 7E7 air cap and DeVilbiss GTI Pro Spray Gun with T2 air cap as meeting the high-volume, low-pressure (HVLP) transfer efficiency requirement of District Rule 423, Motor Vehicle and Mobile Equipment Coating Operations. This District relies on the California Air Resources Board's (CARB) equipment precertification program for such pre-approvals and we have no formal process of our own. However, we can understand why you may not want to go to the expense of pursuing CARB's approval.

This is to indicate that any request by an applicant to use your equipment in lieu of an HVLP spray gun for automobile refinishing must be evaluated on a case-by-case basis. Prior to operation a San Luis Obispo County Air Pollution Control District Permit Application Form to modify their permit must be submitted for review. If their proposal is consistent with the constraints identified for approval in the three South Coast Air Quality Management District's letters to you dated December 9, 2008, and the applicant refers to that approval and the supporting documentation you have previously provided, we will most likely allow the spray guns listed above to be used in lieu of HVLP technology.

If you have any questions regarding this matter, contact me at (805) 781-5767.

Sincerely,

PAUL L. REITZ
Air Pollution Control Engineer

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