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MAR 0 6 2009

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

Re: DeVilbiss CVI Spray Gun with #510 air cap transfer efficiency vs HVLP

Dear Mr. Charpie

This letter is in response to your letter dated December 11, 2008, in which you requested written approval to sell and operate the DeVilbiss CVI Spray Gun with #510 air cap in Ohio pursuant to Ohio Administrative Code (OAC) 3745-21-18(C)(1)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your letter, the supporting test documentation included in your letter and the approval letter from the South Coast Air Management District (SCAQMD).

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected county*, specified in OAC rule 3745-21-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(1)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted indicates that the DeVilbiss CVI Spray Gun with #510 air cap is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as found in the SCAQMD approval letter) and shall apply to any equipment sold and operated in the affected counties in Ohio:

a. 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 affected counties in Ohio that the spray gun is only approved for the application of color coatings and clear coatings subject to OAC Chapter 3745-

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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b. 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 affected counties in Ohio that the maximum air pressure supplied to the spray gun shall not exceed 26 psig.

c. 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 affected counties in Ohio. 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 affected counties in Ohio that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.

d. 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 (c).

e. 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 affected counties in Ohio.

f. DeVilbiss Automotive Refinishing shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss CVI spray gun on all DeVilbiss CVI High Efficiency spray guns sold or distributed for use within the affected counties in Ohio.

g. This approval is only valid if during actual operation the DeVilbiss CVI High Efficiency spray guns are labeled as described in conditions (e) and (f).

h. 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 appropriate Ohio EPA district office or local air agency.

By means of this letter I am approving the use of the DeVilbiss CVI High Efficiency spray gun as an equivalent coating application method. Ohio EPA, as time allows, will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method and will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a

link on our website for this rule which will indicate that this spray gun has been approved as an equivalent method to HVLP.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,

Chris Korleski
Director
Ohio EPA

cc: Lee Burkleca, DAPC
Jennifer Hunter, DAPC
Jim Orlemann, DAPC
Donald L. Vanterpool, Legal Office