

September 20, 2002

Mark Charpie ITW Automotive Refinishing 1724 Indian Wood Circle Maumee, OH 43537-4048

Re: DeVilbiss GFG-670 (Plus) Spray Gun

Dear Mr. Charpie:

You have requested pre-approval of the DeVilbiss GFG-670 (Plus) spray gun as meeting the high-volume, low-pressure (HVLP) transfer efficiency requirement of District Rule 423, Motor Vehicle Coating Operations. As we have stated earlier, this District relies on the California Air Resources Board's (CARB's) 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. If their proposal is consistent with the constraints identified for approval in the South Coast Air Quality Management District's letter to you of August 9, 2002, and the applicant refers to that approval and the supporting documentation you have previously provided, we will most likely allow the GFG-670 (Plus) spray gun to be used in lieu of HVLP technology.

If you have any questions, feel free to contact me at 805-781-5912 or ddixon_apcd@co.slo.ca.us.

Sincerely,

DAVID W. DIXON Engineering Supervisor

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