



April 7, 2021

Mr. Raymond Reitz
Engineer
Carlisle Fluid Technologies
320 Phillips Avenue
Toledo, OH 43612

Subject: **Rule 459 Transfer Efficiency Equivalent Approval of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency**

Dear Mr. Reitz:

The Sacramento Metropolitan Air Quality Management District has completed review of your February 18, 2021 petition requesting approval of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency (previously named Tekna Pro Lite High Efficiency Spray gun with Air Cap TE25) as having a transfer efficiency equivalent to or better than high volume low pressure (HVLP) spray equipment. The review included evaluating the report titled "Carlisle Fluid Technologies (CFT) Tekna Clearcoat Transfer Efficiency – Final Report" dated May 8, 2019 and the South Coast Air Quality Management District's approval letter of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency dated September 4, 2020.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency was determined by the test methods specified in SMAQMD Rule 459, *Automotive, Mobile Equipment, And Associated Parts And Components Coating Operations*, and the transfer efficiency of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency were verified to be equivalent to, or higher than, HVLP spray equipment. Based on this review, the District hereby grants conditional approval of the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency for use in the District. This approval is subject to the following conditions.

1. Carlisle Fluid Technologies must supply written notification with each DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High sold or distributed for use within the jurisdiction of the District that the spray gun with air cap TE25 DeVilbiss High Efficiency is only approved for the application of clearcoats; all coatings are subject to Rule 459.
2. This approval is only valid if the air pressure supplied to the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency is equal to or less than 26 psig. Carlisle Fluid Technologies must supply written notification with DeVilbiss Pro Lite Clearcoat Spray Gun with Air

Cap TE25 DeVilbiss High Efficiency sold or distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun must not exceed 26 psig.

3. Carlisle Fluid Technologies must supply a 100 psig (full scale) mechanical pressure gauge (Model No. HAV-512) with markings every 2 psig, or a 160 psig (full scale) digital pressure gauge (Model No. HAV-555) that measures in 1 psig increments, or a 100 psig (full scale) digital pressure gauge (Model No. DGIPRO-504-PSI) that measures in 1 psig increments with each DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency sold or distributed for use within the jurisdiction of the District. Carlisle Fluid Technologies must supply written notification with each DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency sold or distributed for use within the jurisdiction of the District specifying that the pressure gauge must be attached to the spray gun and be in good working condition and reading no greater than 26 psig whenever the spray gun is in operation.
4. This approval is only valid if during actual operation the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency is equipped with a properly operating pressure gauge that meets the criteria specified in Condition No. 3.
5. Carlisle Fluid Technologies must add a clearly visible permanent label on the spray gun air cap which identifies it as "Air Cap TE25 DeVilbiss High Efficiency" for all DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency sold or distributed for use within the District.
6. Carlisle Fluid Technologies must add a clearly visible permanent label on the spray gun body which identifies it as "DeVilbiss Pro Lite Clearcoat" and indicates that the inlet air pressure must not exceed 26 psig for all DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency sold or distributed for use within the District.
7. This approval is only valid if during actual operation, the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency is labeled as described in Condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss Pro Lite Clearcoat Spray Gun with Air Cap TE25 DeVilbiss High Efficiency model tested. Any modification of the spray guns, air caps, or pressure gauge design will invalidate this approval letter unless the modification is approved by the District.

If you have any questions concerning this matter, please contact Jeff Quok of my staff at (916) 874-4863.

Sincerely,



Amy Roberts
Division Manager

cc: Alberto Ayala, Executive Director/Air Pollution Control Officer, SMAQMD
Angela Thompson, Program Manager, SMAQMD
Brian Krebs, Program Manager, SMAQMD