

July 3, 2019

Mr. Lorenzo Zanetti
CEO
Walcom USA LLC
60 Hammarlund Way
Middletown, RI 02842

Subject: **Rule 459 Transfer Efficiency Equivalent Approval of the Genesi Carbonio 360 Non-HVLP Spray Gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat)**

Dear Mr. Zanetti:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your April 24, 2019 petition requesting approval of the Genesi Carbonio 360 Non-HVLP Spray Gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) as having a transfer efficiency equivalent to or better than high volume low pressure (HVLP) spray equipment. The review included evaluating the reports titled "Walcom Spray Gun Genesi Carbonio HTE Transfer Efficiency Final Report" dated November 14, 2017 and "Walcom Spray Gun Genesi Carbonio HTE Transfer Efficiency Addendum Report" dated November 6, 2018, and the South Coast Air Quality Management District's approval letter of the Genesi Carbonio 360 Non-HVLP Spray Gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) dated February 27, 2019.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the Genesi Carbonio 360 Non-HVLP Spray Gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) were 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 Genesi Carbonio 360 Non-HVLP Spray Gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) were verified to be equivalent to, or higher than, HVLP spray equipment. Based on this review, the SMAQMD hereby grants conditional approval of the Genesi Carbonio 360 Non-HVLP Spray Gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) for use in the SMAQMD. This approval is subject to the following conditions.

1. Walcom USA LLC must supply written notification with each Genesi Carbonio 360 spray gun sold or distributed for use within the jurisdiction of the SMAQMD that the spray gun with air cap HTE-B 1.3 is only approved for the application of primers and color coats (also known as base coats), and the spray gun with air cap HTE-C 1.3 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 Genesi Carbonio 360 spray gun is equal to or less than 30 psig. Walcom USA LLC must supply written notification with each Genesi Carbonio 360 spray gun sold or distributed for use within the jurisdiction of the

SMAQMD that the maximum air pressure supplied to the spray gun must not exceed 30 psig.

3. Walcom USA LLC must supply a digital Carbon Fiber Air Regulator DGT (reference numbers 90183/W or 90180/W), with each Genesi Carbonio 360 spray gun sold or distributed for use within the jurisdiction of the SMAQMD. Walcom USA LLC must supply written notification with each Genesi Carbonio 360 spray gun sold or distributed for use within the jurisdiction of the SMAQMD specifying that the digital Carbon Fiber Air Regulator DGT (reference numbers 90183/W or 90180/W) must be attached to the spray gun and be in good working condition and reading no greater than 30 psig whenever the spray gun is in operation.
4. This approval is only valid if during actual operation the Genesi Carbonio 360 spray gun is equipped with a properly operating digital Carbon Fiber Air Regulator DGT (reference numbers 90183/W or 90180/W).
5. Walcom USA LLC must add a clearly visible permanent label specifying that the inlet air pressure must not exceed 30 psig to all Genesi Carbonio 360 spray guns sold or distributed for use within the SMAQMD.
6. This approval is only valid if during actual operation, the Genesi Carbonio 360 spray gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) is labeled as described in condition number 5.
7. This approval is only valid for the Genesi Carbonio 360 spray gun with Air Caps HTE-B 1.3 (Primer/Basecoat) and HTE-C 1.3 (Clearcoat) 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 SMAQMD.

If you have any questions concerning this matter, feel free to contact John Angi of my staff at (916) 874-1326.

Sincerely,

Handwritten signature in blue ink that reads "Alberto Ayala for".

Alberto Ayala, PH.D., M.S.E.
Executive Director/Air Pollution Control Officer