September 18, 2018

Mr. Marvin Burns R & D Manager Carlisle Fluid Technology 320 Phillips Avenue Toledo, Ohio 43612

Dear Mr. Burns:

Subject: Rule 1151 Transfer Efficiency Approval of the Tekna High Efficiency Spray

Gun with the Addition of a New Digital Pressure Gauge with Model No. DGIPRO-504-PSI and Changing of Company Name from DeVilbiss Automotive Refinishing to Carlisle Fluid Technology, and Replacing ITW with DeVilbiss in the Name of the Tekna High Efficiency Spray Gun

(Application No. 597657)

Reference is made to the above application which you submitted requesting the inclusion of the digital pressure gauge Model No. DGIPRO-504-PSI as an approved gauge for use with the DeVilbiss Tekna High Efficiency spray guns as covered by our September 8, 2011 letter, and to change the company name from DeVilbiss Automotive Refinishing to Carlisle Fluid Technologies as requested in your March 5, 2018 e-mail.

The tests data presented in your letter dated November 20, 2017 showed that the air pressure readings at the center and at the air horns of the air caps of spray guns using the Model No. DGIPRO-504-PSI gauge to monitor the air inlet pressure are consistently lower than the air pressure readings of spray guns using one of the currently approved gauges. It is therefore concluded that DeVilbiss Tekna High Efficiency spray guns equipped with the digital pressure gauge Model No. DGIPRO-504-PSI will have equivalent or better transfer efficiency with spray guns equipped with currently approved gauges at the same maximum air inlet pressure.

As reported in your document entitled "Evaluation of the DeVilbiss CVI, GTI Pro, and ITW Tekna High Efficiency (HE) spray guns for use in the South Coast Air Quality Management District (SCAQMD)" dated May 2008 including the supplemental information submitted electronically on October 22, 2008 in response to our September 23, 2008 request for additional information. The results of the transfer efficiency testing performed indicate that the DeVilbiss Tekna High Efficiency spray gun is capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment. As a result, the DeVilbiss Tekna High Efficiency spray gun is approved for

operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, under Rule 1151(d)(7)(A)(iii). This approval is an alternative to the approval letter dated December 9, 2008 and is subject to the following conditions:

- 1. Carlisle Fluid Technology shall supply written notification with each DeVilbiss Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the spray gun is only approved for the application of color coatings and clear coat coatings subject to Rule 1151.
- 2. This approval is only valid if the air pressure supplied to the DeVilbiss Tekna High Efficiency spray gun is equal to or less than 22 psig. Carlisle Fluid Technology shall supply written notification with each DeVilbiss Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the maximum air pressure supplied to the spray gun shall not exceed 22 psig.
- 3. Carlisle Fluid Technology shall 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 Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District. Carlisle Fluid Technology shall supply written notification with each DeVilbiss Tekna High Efficiency spray gun sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.
- 4. This approval is only valid if during actual operation the DeVilbiss Tekna High Efficiency spray gun is equipped with a properly operating pressure gauge that meets the criteria specified in condition no. 3.
- 5. Carlisle Fluid Technology shall add a clearly visible permanent label on the spray gun air cap specifying the air cap designation 7E7 and that the inlet air pressure shall not exceed 22 psig to all DeVilbiss Tekna High Efficiency spray guns sold or distributed for use within the South Coast Air Quality Management District.
- 6. Carlisle Fluid Technology shall add a clearly visible permanent label on the spray gun body identifying that the gun body is a Tekna spray gun on all Devilbiss Tekna High Efficiency spray guns sold or distributed for use within the South Coast Air Quality Management District.

- 7. This approval is only valid if during actual operation the Devilbiss Tekna High Efficiency spray guns are labeled as described in condition numbers 5 and 6.
- 8. This approval is only valid for the Devilbiss Tekna High Efficiency spray gun model tested. Any modification of the spray gun or pressure gauge design shall invalidate the approval unless the modification is approved by the South Coast Air Quality Management District

If you have any questions regarding this approval, please call me at (909) 396-3129 or send me an e-mail at equizon@aqmd.gov.

Sincerely,

Mitch Haimov, M.S.

Senior Air Quality Engineering Manager

Coating, Printing, Plating,

Military & Entertainment Operations

MH:EVQ