

**AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION
POLICIES AND PROCEDURES**

Policy No. II.1.3
Div Pol Yr

Draft

Supersedes No.
Div Pol Yr

Final X

Date: August 19, 1998

Pages 2

Topic: Definition of HVLP Spray Equipment

Distribution: APCD Staff

1.0. Applicability

Purpose: This policy was written to provide consistency across the coating rules for the purpose of determining compliant spray equipment. Since the various coating rules were developed and modified at different times, the definition of high-volume low-pressure spray equipment varies. Rules 330 and 337 have a definition for HVLP that includes a requirement for minimum flow rate of 15.5 CFM. This definition was based on older technology when flow rates (volumes) were higher for HVLP guns. The high flow rate does not affect the transfer efficiency but helped to describe the new, higher transfer efficiency spray guns. New spray guns have been developed with lower flow rates that have the desired transfer efficiencies. Thus the reference to flow rate has been removed in the more recent definitions of HVLP in Rules 339 and 351. The HVLP definitions in Rules 330 and 337 prohibit the use of spray guns that are allowed under Rules 339 and 351 and coating rules in South Coast AQMD, Ventura APCD, SLO APCD, and Bay Area AQMD. This prohibition does not affect emissions and will be removed upon the next revision to each rule.

Many times the same spray equipment will be used to coat substrates covered by Rule 339 and Rule 330 or Rule 337. Since the definition of HVLP in Rule 339 specifies where the pressure is measured it is the more stringent definition and is more protective of the environment. Rule 101 states that "Whenever more than one rule of these Rules and Regulations applies to any article, machine, equipment or other contrivance, the rule or combination of rules resulting in the smallest rate or lowest concentration of air contaminants released to the atmosphere shall apply." Therefore, it is appropriate to apply the Rule 339 definition of HVLP to Rules 330 and 337. Although the Rule 339 definition is more protective of air quality, sources are not likely to complain because the HVLP spray equipment they use is compliant with the Rule 339 definition of HVLP.

2.0 Policy

For the purpose of determining if a paint spray gun meets the definition of HVLP guns for Rules 330 and 337 staff shall rely on the definition of HVLP in Rule 339. That definition is provided below.

"High-Volume Low Pressure (HVLP) Spray" means spray equipment used to apply coatings by means of a high volume of air delivered at pressures between 0.1 and 10 psig air pressure, measured at the cap.

(

(

(

This definition does not contain the requirement for a minimum flow rate of greater than 15.5 CFM but it does provide clarification on where the air pressure is measured. Please note that the cap also includes the "air horns" at the perimeter of the cap.

3.0 Sunset Provision

This policy and procedure shall be deleted upon revision to the HVLP definitions in Rules 330 and 337

