

From: [Jesus Ramirez](#)
To: [Sara Robbe](#); [Dale Stitt](#)
Cc: [Belen Leon-Lopez](#); [Thomas Brinkerhoff](#); [Chris Plancarte](#); [Victor Mendez](#); [Mario Gonzalez](#); [Gerardo Noriega](#)
Subject: FW: County Approval Request
Date: Monday, March 30, 2026 2:51:43 PM
Attachments: [image002.png](#)
[image003.png](#)
[Imperial_EPA_AX1_CACountyRequest_SR1_11172023-12.pdf](#)
[Imperial_EPA_SR2_CACountyRequest_SR1_11172023_12.pdf](#)
[ANEST - 627297.pdf](#)
[EPA_WS-400-SR2-Digital-Non-Digital.pdf](#)
[ANEST - 632690.pdf](#)
[ANEST - 636151.pdf](#)
[EPA_WS-400-AX-1-SR2-Digital-Non-Digital.pdf](#)

Good Morning Ms. Robbe!

Receipt of your email is acknowledged.

The Imperial County APCD does not provide you a written authorization/confirmation to use specific type of products, in your case, the paint spray guns.

As stated in the our Rule 427, Automotive Refinishing Operations:

C.7 Coating Application Methods No person shall apply any coating to any motor vehicle, mobile equipment, or associated parts and components unless one of the following application methods is used: C.7.a Brush, dip or roller. C.7.b Electrostatic spray. C.7.c High-Volume Low-Pressure (HVLP) spray equipment C.7.d Use of a spray gun: If a spray gun is used, the end user must demonstrate that the gun meets the HVLP definition found in Rule 101 Definitions in design and use. A satisfactory demonstration must be based on the manufacturer's published technical material on the design of the gun and by a demonstration of the operation of the gun using an air pressure tip gauge from the Imperial County Air Pollution Control District Rule 427 427-5 manufacturer of the gun. C.7.e Any alternative method that achieves a transfer efficiency equivalent to, or higher than, the application methods listed in sections C.7.a, C.7.b, or C.7.c as determined per section E.9. Written approval from the Executive Officer or Air Pollution Control Officer shall be obtained for each alternative method prior to use. Section C.7 does not apply to underbody coatings, graphic arts operations, truck bed liner coatings, or any coating use of less than one (1) fluid ounce (29.6 milliliters)

E.9 Transfer Efficiency. Spray equipment transfer efficiency (as specified in the definition for "Transfer Efficiency" found in Rule 101 Definitions and C.7.e) shall be determined by using South Coast Air Quality Management District "Spray Equipment Transfer Efficiency Test Procedures for Equipment User" (May 24, 1989). E.10 HVLP Equivalency. Spray equipment HVLP equivalency (as specified in section C.7.d) shall be determined by using South Coast Air Quality Management District "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns" (September 26, 2002

As long as you have proper documentation that your spray guns meet the definition of HVLP or meet the Transfer Efficiency, you are clear to sell your products in Imperial County.

If you have any questions feel free to contact me.

Jesus A. Ramirez
APC Division Manager
ICAPCD

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Sara Robbe



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