



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

AUG 19 2011

Mr. Mark Hebbeler
North American Marketing Manager
ANEST IWATA USA, Inc.
5325 Muhlhauser Road
West Chester, Ohio 45011

Dear Mr. Hebbeler:

This letter is in response to your request for approval of the ANEST IWATA W400-LV spray gun, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns, for use when spray applying automotive refinish coatings under Clean Air Act regulations, subpart HHHHHH of 40 Code of Federal Regulations (CFR) Part 63. These spray guns are approved, with conditions outlined below, for operations subject to the regulations cited below.

We have completed our review of your reports entitled:

“Final Test Report ANEST IWATA Corporation W400-LV Spray Gun Transfer Efficiency Equivalency Evaluation For Use in SCAQMD” sent as an attachment to email message from Mr. Mark Hebbeler dated 7/20/11.

“Final Test Report ANEST IWATA W400-LV Spray Gun DuPont Performance Coatings Transfer Efficiency Equivalency Evaluation for use by SCAQMD” dated October 14, 2005.

The results of the transfer efficiency testing performed indicate that the ANEST IWATA W400-LV spray guns are capable of achieving equivalent or better transfer efficiency than HVLP spray equipment. As a result, the ANEST IWATA W400-LV spray guns are approved for operations subject to §63.11173(e)(3) of 40 CFR Part 63 Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions.

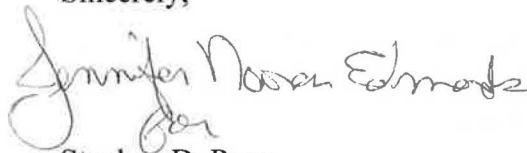
1. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed that the spray gun is approved as providing equivalent transfer efficiency as HVLP spray guns for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.
2. This approval is only valid if the air pressure supplied to the ANEST IWATA W400-LV spray gun is equal to or less than 20 psig. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 20 psig for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.

3. ANEST IWATA shall supply an ANEST IWATA AK-1B air flow control valve and pressure gauge (item #8130), AK-1B2 air flow control valve and pressure gauge (item #8130B) or AK-1R air flow regulator and pressure gauge (item #8131) to identify the allowable spray gun inlet air pressure with each ANEST IWATA W400-LV spray gun sold or distributed. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed that the ANEST IWATA AK-1B air flow control valve and pressure gauge (item #8130), AK-1B2 air flow control valve and pressure gauge (item #8130B) or AK-1R air flow regulator and pressure gauge (item #8131) shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.

4. ANEST IWATA shall provide written notification to buyers/users of the ANEST IWATA W400-LV spray gun that they must be equipped with a properly operating ANEST IWATA AK-1B air flow control valve and pressure gauge (item #8130), AK-1B2 air flow control valve and pressure gauge (item #8130B) or AK-1R air flow regulator and pressure gauge (item #8131) as described in condition number 3 and that they must be operated at less than or equal to 20 psig when they are used for applying coatings subject to 40 CFR Part 63 Subpart HHHHHH.

The written notification requirements outlined in this letter may be fulfilled by including a copy of this approval letter with the documentation provided to the purchaser of the spray gun. If you have any questions regarding this approval, please contact Kim Teal, of my staff, at (919) 541-5580 or teal.kim@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen D. Page". The signature is written in a cursive style with a large initial 'S'.

Stephen D. Page

Director

Office of Air Quality Planning
and Standards