

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RESEARCH TRIANGLE PARK, NC 27711

APR 15 2011

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

Mr. Tony Larimer Director of Sales and Marketing Dan-Am Company 1 SATA Drive Spring Valley, Minnesota 55975

Dear Mr. Larimer:

This letter is in response to your request for approval of the non-digital and digital versions of the SATAjet RP, SATAjet 3000 RP, and SATAjet 3000 B RP spray guns, hereinafter referred to as the SATAjet spray guns, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns for use when spray applying automotive refinish coatings under subpart HHHHHHH of 40 CFR Part 63.

We have completed our review of your reports entitled:

"Evaluation of the SATAjet RP non-digital and Digital 2 spray gun for use in the South Coast Air Quality Management District (SCAQMD)" dated August 8, 2003, including the supplemental information dated October 15, 2003, and November 4, 2003, and

"Evaluation of the Satajet3000 RP non-digital and Digital spray gun for use in the South Coast Air Quality Management District (SCAQMD)" dated March 21, 2006, including the supplemental information dated May 23, 2006, June 13, 2006, and June 21, 2006.

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

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 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 HHHHHHH.

- 2. This approval is only valid if the air pressure supplied to the SATAjet spray gun is equal to or less than 35 pound-force per square inch gauge (psig). SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 35 psig for the application of coatings subject to 40 CFR part 63 subpart HHHHHHH.
- 3. SATA Farbspritztechnik GmbH & Co. KG shall supply a SATA air micrometer with gauge 0/8455 (product number 27771) modified to clearly identify the maximum allowable spray gun inlet air pressure with each SATAjet spray gun sold or distributed. The required modification shall provide a visual confirmation that the maximum allowed air pressure is 35 psig. An example of this visual confirmation may be color coding the gauge such that 35 psig and below is green and the area above 35 psig is red. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet spray gun sold or distributed that the SATA air micrometer with gauge 0/8455 (product number 27771) modified as described above 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 HHHHHHH.
- 4. SATA Farbspritztechnik GmbH & Co. KG shall provide written notification to buyers/users of the SATAjet spray gun that they must be equipped with a properly operating SATA air micrometer with gauge as described in condition number 3 and that they must be operated at less than or equal to 35 psig when they are used for applying coatings subject to 40 CFR Part 63 Subpart HHHHHHH.

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,

Director

Office of Air Quality Planning and Standards