

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RESEARCH TRIANGLE PARK, NC 27711

JUL 27 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 4000 B RP 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 the conditions outlined below, for operations subject to the regulations cited below.

We have completed our review of your reports entitled:

"Evaluation of the SATAjet 4000 B RP non-digital and digital spray gun for use in the South Coast Air Quality Management District (SCAQMD)" dated March 11, 2011.

The results of the transfer efficiency testing performed indicate that the SATAjet 4000 B RP spray guns are capable of achieving equivalent or better transfer efficiency than HVLP spray equipment. As a result, the SATAjet 4000 B RP 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. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 4000 B RP 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 SATAjet 4000 B RP spray gun is equal to or less than 32 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 4000 B RP spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 32 psig for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.
- 3. SATA Farbspritztechnik GmbH & Co. KG shall supply a SATA air micrometer with gauge 0/8455 (product number 27771), SATA adam digital air micrometer with gauge (product number 130146), or SATA adam 2 digital air micrometer with gauge (product number 160853) with each standard (non-digital) SATAjet 4000 B RP spray gun sold or distributed. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each standard (non-

digital) SATAjet 4000 B RP spray gun sold or distributed that the SATA air micrometer with gauge 0/8455 (product number 27771), SATA adam digital air micrometer with gauge (product number 130146) or SATA adam 2 digital air micrometer with gauge (product number 160853) 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. The digital SATAjet 4000 B RP spray gun has integrated air micrometers in the handle and are not required to have a separate air micrometer.

4. SATA Farbspritztechnik GmbH & Co. KG shall provide written notification to buyers/users of the standard (non-digital) SATAjet 4000 B RP spray gun that they must be equipped with a properly operating SATA air micrometer as described in condition number 3 and that they must be operated at less than or equal to 32 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, Isora Elmode Stephen D. Page

Office of Air Quality Planning and Standards