

June 6, 2013

Mr. Mark Hebbeler
Marketing and Sales Director
ANEST IWATA USA, Inc.
5325 Muhlhauser Road
Hamilton, OH 45011

Subject: **Rule 459 Transfer Efficiency Equivalent Approval of the ANEST IWATA Supernova WS400 High Transfer Efficiency Spray Gun**

Dear Mr. Hebbeler:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your May 20, 2013 petition requesting approval of the ANEST IWATA Supernova WS400 spray gun as having a transfer efficiency equivalent to or better than high volume low pressure (HVLP) spray equipment. The review included evaluating the report titled "Anest Iwata Supernova Model WS400 Non-HVLP High Transfer Efficiency Compliant Spray Gun-Final Report" dated July 12, 2012; the report titled "Anest Iwata Supernova Model WS400 Non-HVLP High Transfer Efficiency Compliant Spray Gun-Final Report-Addendum" dated October 12, 2012; the South Coast Air Quality Management District's approval letter of the ANEST IWATA Supernova WS400 spray gun dated October 30, 2012; and the United States Environmental Protection Agency's approval letter of the ANEST IWATA Supernova WS400 spray gun dated January 15, 2013.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the ANEST IWATA Supernova WS400 spray gun was determined by the test methods specified in SMAQMD Rule 459, *Automotive, Mobile Equipment, And Associated Parts And Components Coating Operations*, and the transfer efficiency of the ANEST IWATA Supernova WS400 spray gun was verified to be equivalent to, or higher than, HVLP spray equipment. Based on this review, the SMAQMD hereby grants conditional approval of the ANEST IWATA Supernova WS400 spray gun for use in the SMAQMD's jurisdiction. This approval is subject to the following conditions.

1. ANEST IWATA shall supply written notification with each ANEST IWATA Supernova WS400 spray gun sold or distributed for use within the jurisdiction of the SMAQMD specifying that the spray gun is only approved for the application of coatings subject to Rule 459.
2. The approval is only valid if the air pressure supplied to the ANEST IWATA Supernova WS400 spray gun is equal to or less than 29 psig. ANEST IWATA shall supply written notification with each ANEST IWATA Supernova WS400 spray gun sold or distributed for use within the jurisdiction of the SMAQMD specifying that the maximum air pressure supplied to the spray gun shall not exceed 29 psig.
3. ANEST IWATA shall supply an ANEST IWATA AK-1B air flow control valve and pressure gauge (Product Number 8130) or AK-1R air flow regulator and pressure gauge (Product Number 8131) with each ANEST IWATA Supernova WS400 sold or distributed for use

within the jurisdiction of the SMAQMD. ANEST IWATA shall supply written notification with each ANEST IWATA Supernova WS400 spray sold or distributed for use within the jurisdiction of the SMAQMD specifying that the ANEST IWATA AK-1B air flow control valve and pressure gauge (Product 8130) or AK-1R air flow regulator and pressure gauge (Product 8131) shall be properly attached to the spray gun and be in good working condition whenever the spray gun is in operation.

4. This approval is only valid if during actual operation the ANEST IWATA Supernova WS400 spray gun is equipped with a properly operating ANEST IWATA AK-1B air flow control valve and pressure gauge (Product 8130) or AK-1R air flow regulator and pressure gauge (Product 8131).
5. ANEST IWATA shall add a clearly visible permanent label specifying that the inlet air pressure shall not exceed 29 psig to all ANEST IWATA Supernova WS400 spray guns sold or distributed for use within the SMAQMD
6. This approval is only valid if during actual operation the ANEST IWATA Supernova WS400 spray guns are labeled as described in condition 5.
7. This approval is only valid for the ANEST IWATA Supernova WS400 spray gun model tested. Any modification of the spray gun or pressure gauges design shall invalidate this approval letter unless the modification has received prior approval from the SMAQMD.

If you have any questions concerning this matter, feel free to contact Patrick Tedeschi of my staff at (916) 874-4864.

Sincerely,



Larry Greene
Executive Director/Air Pollution Control Officer