



July 2, 2024

Sara Robbe
Marketing Manager
ANEST IWATA Americas
10148 Commerce Park Drive
Cincinnati, OH 45246

Subject: **Rule 459 Transfer Efficiency Equivalent Approval of the ANEST IWATA WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1 (Clearcoat)**

Dear Sara Robbe:

The Sacramento Metropolitan Air Quality Management District has completed review of your January 18, 2024 petition requesting approval of **ANEST IWATA WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** as having a transfer efficiency equivalent to or better than high volume low pressure (HVL) spray equipment. The review included evaluating the report titled "Evaluation of the ANEST IWATA WS-400-AX-1 non-digital and digital paint spray guns for use in the South Coast Air Quality Management District (SCAQMD)" dated August 30, 2022 and the South Coast Air Quality Management District's approval letter of the **ANEST IWATA WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** dated April 13, 2023.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the **ANEST IWATA WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** 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 WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** were verified to be equivalent to, or higher than, HVL spray equipment. Based on this review, the District hereby grants conditional approval of the **ANEST IWATA WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** for use in the District. This approval is subject to the following conditions.

1. Anest Iwata must supply written notification with each **WS-400-AX-1 Non-Digital Spray Gun** sold or distributed for use within the jurisdiction of the District that the spray gun with **Air Cap WS-400-01-AX-1** is only approved for the application of clearcoats; all coatings are subject to Rule 459.
2. This approval is only valid if the air pressure supplied to the **WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** is equal to or less than 36 psig. Anest Iwata must supply written notification with **WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** sold or

distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun must not exceed 36 psig.

3. Anest Iwata must supply a mechanical pressure gauge (Item #8131B) with each **WS-400-AX-1 Non-Digital Spray Gun** sold or distributed for use within the jurisdiction of the District. Anest Iwata must supply written notification with each **WS-400-AX-1 Non-Digital Spray Gun** sold or distributed for use within the jurisdiction of the District specifying that the pressure gauge must be attached to the spray gun and be in good working condition and reading no greater than 36 psig whenever the spray gun is in operation.
4. This approval is only valid if during actual operation the **WS-400-AX-1 Non-Digital Spray Gun** is equipped with a properly operating pressure gauge that meets the criteria specified in Condition No. 3.
5. Anest Iwata must add a clearly visible permanent label on the spray gun air cap which identifies it as "**WS-400-01-AX-1**" for all **WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** sold or distributed for use within the District.
6. Anest Iwata must add a clearly visible permanent label on the spray gun body which identifies it as "**WS-400-01-AX-1**" and indicates that the inlet air pressure must not exceed 36 psig for all **WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** sold or distributed for use within the District.
7. This approval is only valid if during actual operation, the **WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** (Clearcoat) is labeled as described in Condition numbers 5 and 6.
8. This approval is only valid for the **WS-400-AX-1 Non-Digital Spray Gun with Air Cap WS-400-01-AX-1** (Clearcoat) model tested. Any modification of the spray guns, air caps, or pressure gauge design will invalidate this approval letter unless the modification is approved by the District.

If you have any questions concerning this matter, please contact Jeff Quok of my staff at (279) 207-1145.

Sincerely,

Amy L. Roberts

Amy Roberts
Division Manager

cc: Alberto Ayala, Executive Director/Air Pollution Control Officer, SMAQMD
Angela Thompson, Program Manager, SMAQMD
Brian Krebs, Program Manager, SMAQMD