



May 13, 2009

Mr. Kuniyisa Tomita, President
ANEST IWATA USA, Inc.
9920 Windisch Road
West Chester, OH 45069-3804

Subject: **RULE 459 TRANSFER EFFICIENCY AMENDED APPROVAL OF ANEST IWATA W400-LV SPRAY GUN**

Dear Mr. Tomita:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed our review of your March 25, 2009 petition requesting an amendment to the approval of ANEST IWATA W400-LV Spray Gun. Your request also was submitted to the United States Environmental Protection Agency (EPA) Region 9 for approval as required by SMAQMD Rule 459.

On May 5, 2009, EPA granted conditional approval of the spray gun for use within the SMAQMD's jurisdiction. A copy of EPA's approval letter is enclosed. Based on the information you submitted and EPA's approval, the SMAQMD hereby grants conditional approval of the ANEST IWATA W400-LV Spray Gun for use in the SMAQMD subject to the following amended conditions:

1. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed for use within the jurisdiction of the SMAQMD that the spray gun is approved only for the application of coatings subject to Rule 459, *Automotive, Truck and Heavy Equipment Refinishing Operations*.
2. This approval is valid only 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 for use within the jurisdiction of the SMAQMD that the maximum air pressure supplied to the spray gun shall not exceed 20 psig.
3. ANEST IWATA shall supply an ANEST IWATA AK-1B air flow control valve and pressure gauge (Item #8130) or AK-1R air flow regulator and pressure gauge (Item #8131) to clearly identify the maximum allowable spray gun inlet air pressure with each ANEST IWATA W400-LV spray gun sold or distributed for use within the jurisdiction of the SMAQMD. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed for use within the jurisdiction of the SMAQMD that the ANEST IWATA AK-1B air flow control valve and pressure gauge (Item #8130) or AK-1R air flow regulator and pressure gauge (Item #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 W400-LV spray gun is equipped with a properly operating ANEST IWATA AK-1B air flow control valve and pressure gauge (Item #8130) or AK-1R air flow regulator and pressure gauge (Item #8131).
5. This approval is only valid for the ANEST IWATA W400-LV spray gun model tested. Any modification of the spray gun shall invalidate this approval unless the modification is approved by the SMAQMD and EPA Region 9.

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

Sincerely,



Larry Greene
Air Pollution Control Officer

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CC: Mark Hebbeler, ANEST IWATA USA, Inc.

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 5, 2009

Patrick Tedeschi
Program Coordinator, Field Operations
Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814-1908

Subject: Amendment to Approval of ANEST IWATA W400-LV Spray Gun

Dear Mr. Tedeschi:

Sacramento Metropolitan Air Quality Management District (SMAQMD) submitted to EPA Region 9, a request to amend EPA's May 10, 2006 conditional approval of the ANEST IWATA W400-LV Spray Gun to also allow the use of the AK-1R (Item #8131) air pressure regulator as an alternative spray application method in accordance with District Rule 459, Automotive, Truck, and Heavy Equipment Refinishing Operations.

In support of this effort, EPA reviewed the following documents to evaluate whether this spray gun combination was capable of achieving a transfer efficiency which was equivalent to or better than high-volume low pressure (HVLP) spray equipment:

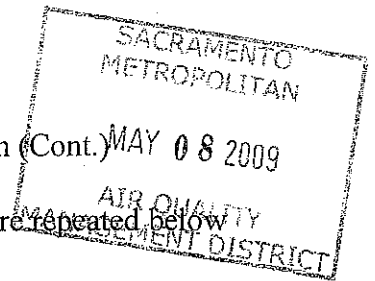
- SMAQMD Rule 459 (Amended 10/2/1997)
- South Coast Air Quality Management District (SCAQMD) approval letter for the ANESTA IWATA W400-LV Spray Gun dated 2/26/2009
- E-mails dated February 11, 2009 and February 19, 2009 between SCAQMD and ANEST IWATA

SMAQMD Rule 459, section 303.1 states that a person shall not apply any coating to any Group I or Group II vehicles or their parts and components unless one of the application methods listed in section 303.1 is used. This section further states that other equivalent methods which have been approved in writing by the Air Pollution Control Officer (APCO) and submitted to and approved by the U.S. EPA may be used.

Based on our review of the SCAQMD's approval letter and the supplied emails between the SCAQMD and ANEST IWATA, EPA agrees that the ANEST IWATA W400-LV Spray Gun is capable of achieving equivalent or better transfer efficiency than high-volume, low pressure spray (HVLP) spray equipment and can be used as an alternative application equipment under SMAQMD Rule 459.

EPA grants conditional approval of the ANEST IWATA W400-LV Spray Gun for use with SMAQMD Rule 459. Our approval is subject to the same conditions outlined in SCAQMD's

Subject: Amendment to Approval of ANEST IWATA W400-LV Spray Gun (Cont.)



approval letter to ANEST IWATA USA, Inc., dated February 26, 2009 and are repeated below for information.

1. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District that the spray gun is only approved for the application of coatings subject to Rule 459.

2. This approval is only valid if the air pressure supplied to the ANEST IWATA 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 for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District that the maximum air pressure supplied to the spray gun shall not exceed 20 psig.

3. ANEST IWATA shall supply an ANEST IWATA AK-1B air flow control valve and pressure gage (Item #8130) or AK-1R air flow regulator and pressure gage (Item #8131) to clearly identify the maximum allowable spray gun inlet air pressure with each ANEST IWATA W400-LV spray gun sold or distributed for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District. ANEST IWATA shall supply written notification with each ANEST IWATA W400-LV spray gun sold or distributed for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District that the ANEST IWATA AK-1B air flow control valve and pressure gage (Item #8130) or AK-1R air flow regulator and pressure gage (Item #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 W400-LV spray gun is equipped with a properly operating ANEST IWATA AK-1B air flow control valve and pressure gage (Item #8130) or AK-1R air flow regulator and pressure gage (Item #8131).

5. This approval is only valid for the ANEST IWATA W400-LV spray gun model tested. Any modification of the spray gun design shall invalidate this approval unless the modification is approved by the Sacramento Metropolitan Air Quality Management District and EPA Region 9.

In summary, EPA agrees that the ANEST IWATA W400-LV spray gun achieves a transfer efficiency equal to or better than HVLP equipment. If you have any questions, please do not hesitate to contact Stanley Tong at (415) 947-4122.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Steckel".

Andrew Steckel,
Chief, Rulemaking Office