

November 30, 2006

Dr. Ewald Schmon
R & D Manager
SATA Farbspritztechnik GmbH & Co. KG
DomertalstraBe 20
70806 Kornwestheim, Germany

Subject: **RULE 459 TRANSFER EFFICIENCY APPROVAL OF SATAjet 3000 RP AND
SATAjet 3000 RP DIGITAL SPRAY GUNS**

Dear Dr. Schmon:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your September 12, 2006 petition requesting approval of SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns. This review included submitting your request to the United States Environmental Protection Agency Region 9 (EPA) for approval as required by SMAQMD Rule 459, *Automotive, Truck and Heavy Equipment Refinishing Operations*.

On November 15, 2006, EPA granted conditional approval of the spray guns for use in the SMAQMD. 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 SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns for use in the SMAQMD. This approval is subject to the following conditions.

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 3000 RP or SATAjet 3000 RP Digital spray gun sold or distributed for use within the jurisdiction of the SMAQMD 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 SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns is equal to or less than 35 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 3000 RP or SATAjet 3000 RP Digital 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 35 psig.
3. SATA Farbspritztechnik GmbH & Co. KG shall supply a Sata air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146) with each SATAjet 3000 RP spray gun sold or distributed for use within the jurisdiction of the SMAQMD. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 3000 RP spray gun sold or distribute within the SMAQMD that the SATA air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146) shall be 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 SATAjet 3000 RP spray gun is equipped with a properly operating Sata air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146).
5. SATA Farbspritztechnik GmbH & Co. KG shall add a clearly visible permanent label specifying that the inlet air pressure shall not exceed 35 psig to all SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns sold or distributed for use within the SMAQMD.
6. This approval is only valid if during actual operation the SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns are labeled as described in condition number 5.
7. This approval is only valid for the SATAjet 3000 RP and SATAjet 3000 RP Digital spray gun models tested.

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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Enclosure



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

November 15, 2006

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

Subject: Approval of SATAjet 3000 RP and SATAjet 3000 RP Digital Spray Guns

Dear Mr. Tedeschi:

Sacramento Metropolitan Air Quality Management District (SMAQMD) submitted to EPA Region 9 a request to approve the use of the SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns as alternative spray application methods in accordance with District Rule 459, Automotive, Truck, and Heavy Equipment Refinishing Operations. EPA has reviewed the documents submitted by SMAQMD, including an August 23, 2006 letter from the South Coast Air Quality Management District (SCAQMD) which stated that these spray guns were capable of achieving equivalent or better transfer efficiency than high-volume, low pressure spray (HVLP) equipment.

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 HVLP spray equipment or one of three other application methods specified 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 submitted test reports and South Coast AQMD's approval letter, EPA agrees that the SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns are capable of achieving equivalent or better transfer efficiency than HVLP spray equipment and can be used as an alternative application equipment under SMAQMD Rule 459.

EPA grants conditional approval of the SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns for use with SMAQMD Rule 459. Our approval is subject to the same conditions outlined in SCAQMD's approval letter to SATA Farbspritztechnik GmbH & Co. KG dated August 23, 2006 and are repeated below for information.

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 3000 RP or SATAjet 3000 RP Digital 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 SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns is equal to or less than 35 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 3000 RP or SATAjet 3000 RP Digital 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 35 psig.

3. SATA Farbspritztechnik GmbH & Co. KG shall supply a Sata air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146) with each SATAjet 3000 RP spray gun sold or distributed for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 3000 RP spray gun sold or distributed within the Sacramento Air Quality Management District that the Sata air micrometer with air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146) shall be 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 SATAjet 3000 RP spray gun is equipped with a properly operating Sata air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146).

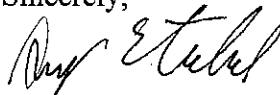
5. SATA Farbspritztechnik GmbH & Co. KG shall add a clearly visible permanent label specifying that the inlet air pressure shall not exceed 35 psig to all SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns sold or distributed for use within the Sacramento Metropolitan Air Quality Management District.

6. This approval is only valid if during actual operation the SATAjet 3000 RP and SATA jet 3000 RP Digital spray guns are labelled as described in condition number 5.

7 This approval is only valid for the SATAjet 3000 RP and SATAjet 3000 RP Digital spray gun models tested.

In summary, EPA agrees that the SATAjet 3000 RP and SATAjet 3000 RP Digital spray guns achieve 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,



Andrew Steckel,
Chief, Rulemaking Office