SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

Larry Greene
AIR POLLUTION CONTROL OFFICER

February 11, 2005

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

Subject: **RULE 459 TRANFER EFFICIENCY APPROVAL OF SATAJET RP AND SATAJET RP DIGITAL 2 SPRAY GUNS**

Dear Dr. Schmon:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has completed review of your December 8, 2004 petition requesting approval of SATAjet RP and SATAjet RP Digital 2 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.

On January 26, 2005, 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 RP and SATAjet RP Digital 2 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 RP or SATAjet RP Digital 2 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, *Automotive, Truck and Heavy Equipment Refinishing Operations.*

2. This approval is only valid if the air pressure supplied to the SATAjet RP and SATAjet RP Digital 2 is equal to or less than 35 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet RP or SATAjet RP Digital 2 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) modified to clearly identify the maximum allowable spray gun inlet air pressure with each SATAjet RP spray gun sold or distributed for use within the jurisdiction of the SMAQMD. The required modification shall provide a visual confirmation that the maximum allowed air pressure is 35 psig such as color coding the gauge to make the area of the gauge at and below 35 psig green and the area of the gauge above 35 psig red or other design approved by the SMAQMD. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet RP spray gun sold or distributed for use within the jurisdiction of the SMAQMD that the Sata air micrometer with gauge 0/8455 (product number 27771) modified as described above 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 RP spray gun is equipped with a properly operating Sata air micrometer with gauge as described in condition number 3.

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 RP Digital 2 spray guns sold or distributed for use within the SMAQMD.

6. This approval is only valid if during actual operation of the SATAjet RP Digital 2 spray gun is labeled as described in condition number 5.

7. This approval is only valid for the SATAjet RP and SATAjet RP Digital 2 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

January 26, 2005

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 RP and SATAjet RP Digital 2 Spray Guns

Dear Mr. Tedeschi:

Sacramento Metropolitan Air Quality Management District (SMAQMD) submitted to EPA Region 9 a request to approve the use of SATAjet RP and SATAjet RP Digital 2 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 a November 25, 2003 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 report and South Coast AQMD's approval letter, EPA agrees that the SATAjet RP and SATAjet RP Digital 2 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 RP and SATAjet RP Digital 2 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 November 23, 2003 and are repeated below for information.

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet RP or SATAjet RP Digital 2 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 RP and SATAjet RP Digital 2 is equal to or less than 35 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet RP or SATAjet RP Digital 2 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) modified to clearly identify the maximum allowable spray gun inlet air pressure with each SATAjet RP spray gun sold or distributed for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District. The required modification shall provide a visual confirmation that the maximum allowed air pressure is 35 psig such as color coding the gauge to make the area of the gauge at and below 35 psig green and the area of the gauge above 35 psig red or other design approved by the Sacramento Metropolitan Air Quality Management District. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet RP spray gun sold or distributed for use within the jurisdiction of the Sacramento Metropolitan Air Quality Management District that the Sata air micrometer with gauge 0/8455 (product number 27771) modified as described above 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 RP spray gun is equipped with a properly operating Sata air micrometer with gauge as described in condition number 3.

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 RP Digital 2 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 RP Digital 2 spray gun is labelled as described in condition number 5.

7 This approval is only valid for the SATAjet RP and SATAjet RP Digital 2 spray gun models tested.

In summary, EPA agrees that the SATAjet RP and SATAjet RP Digital 2 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