OhioEPA

State of Ohio Environmental Protection Agency

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SEP 13 2006

Tony Larimer
National Automotive Distribution Manager
SATA Spray Equipment/DAN-AM Company
One Sata Drive - P.O. Box 46
Spring Valley, MN 55975

Re: SATAjet RP spray guns transfer efficiency vs HVLP

Dear Mr. Larimer

Per you request by letter dated August 31, 2006, Ohio EPA Division of Air Pollution Control (DAPC) has reviewed the documents included in your letter, which support the demonstration that SATAjet RP guns are capable of having equivalent or better transfer efficiency than high-volume low pressure spray technology (HVLP). Your letter also contained copies of numerous approvals letters from various state agencies with equivalent rule requirements including California, New York, Pennsylvania and Maryland among others. You indicated that Ohio EPA's concurrent approval with these documents would be of assistance to both your company and its customers who are subject to the requirements of OAC rule 3745-21-18 (Commercial Motor Vehicle and Mobile Equipment Refinishing Operations) and who currently use or plan to use your spray guns in their operations.

OAC rule 3745-21-18(C)(1) specifies that facilities subject to the requirements of the rule must use one or more of the listed application techniques in accordance with manufacturer's specifications. The rule also allows the owner/operator to use an equivalent application technique pursuant to OAC rule 3745-21-18(C)(1)(k), which states:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone."

Ohio EPA concurs that the results of the transfer efficiency testing indicates that SATAjet RP spray guns are capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). Ohio EPA has reviewed the letters from various states approving the use of this spray gun for similar rule requirements. This approval is also subject to the following conditions (as found in most of the other state's approval letters) and shall apply to any equipment sold in Ohio:

a. SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATAjet RP and SATAjet RP Digital 2 spray gun written notification that the maximum air pressure supplied to the spray gun shall not exceed 35 psig.

b. SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATAjet RP and SATAjet RP Digital 2 spray gun a gun mounted pressure gauge clearly identifying the maximum allowable inlet air pressure of 35 psig, and a gun mounted air pressure regulating device.

c. SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATAjet RP and SATAjet RP Digital 2 spray gun written notification that the gun mounted pressure gauge and air pressure regulatiing device must be attached to the spray gun, and be in good working condition, whenever the spray gun is in use.

d. The approval is only valid for the SATAjet RP and SATAjet RP Digital 2 spray guns.

By means of this letter we are approving the use of SATAjet RP guns as an equivalent coating application method. We will revise OAC rule 3745-21-18 to include this spray gun as an acceptable coating application method, and pursuant to the rule, we will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan for ozone.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,

Joseph P. Koncelik
Director
Ohio EPA

cc: Lee Burkleca, DAPC
Bill Spires, DAPC