

STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

September 8, 2011

Mr. Georg Drakos
Export Sales Manager Overseas
SATA GmbH & Co. KG
Domertalstraße 20
70806 Kornwestheim
Germany

Re: Request for RACT Equivalency Determination for SATAjet 4000 B RP and SATAjet 4000 B RP Digital Spray Guns

Dear Mr. Drakos:

The Air Pollution Control Division (the Division) has reviewed your request dated August 19, 2011 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for SATA GmbH & Co. KG's (SATA's) SATAjet 4000 B RP (non-digital) and SATAjet 4000 B RP Digital spray guns. In your submittal, you provided a copy of a July 27, 2011 Maximum Achievable Control Technology, 40 CFR Part 63, Subpart HHHHHH approval letter from the U.S. Environmental Protection Agency (EPA), a June 2, 2011 approval letter from the South Coast Air Quality Management District (California), and the results from a transfer efficiency test. SATA maintains a list of these and other regulatory agency approval letters on its company web site.

Colorado Air Quality Control Commission (AQCC) Regulation Nos. 3 and 7 establish RACT requirements for sources in the Denver ozone non-attainment area (also referred to as the 8-hour Ozone Control Area, which includes the area that was previously designated as the Denver 1-hour Ozone Attainment/Maintenance Area). The Denver ozone non-attainment area is composed of Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas and Jefferson Counties, plus significant portions of Larimer and Weld Counties.

The Division has previously determined that High Volume Low Pressure (HVLP) paint spray guns constitute RACT for surface coating operations that involve the application of base coats and clear coats in general, and for any top coat applied to a large area. A large area is defined as any area greater than nine (9) square feet. Subject surface coating owner/operators within the Denver ozone non-attainment

area must obtain written permission from the Division prior to using any method other than HVLP application for applying base coats, clear coats or large area top coats.

The results of the transfer efficiency testing included in your transmittal indicate that the SATAjet 4000 B RP (non-digital) and SATAjet 4000 B RP Digital spray guns are capable (under specified operating parameters) of achieving equivalent or better transfer efficiency than HVLP spray equipment. Based on this review, the Division approves their use under the following conditions:

1. The air pressure supplied to the SATAjet 4000 B RP digital and non-digital spray guns is equal to or less than 32 pounds per square inch gauge (psig).
2. An appropriate SATA air micrometer with gauge, provided by SATA is attached to the SATAjet 4000 B RP (non-digital) spray gun and is in good working condition during actual operation. The gauge must clearly indicate that the maximum air pressure to be used is 32 psig and the spray gun must be operated as such. (The SATAjet 4000 B RP Digital already contains a built-in air micrometer with gauge.)
3. A clearly visible permanent label specifying that the inlet air pressure shall not exceed 32 psig is attached on all SATAjet 4000 B RP digital and non-digital spray guns used.
4. A clearly visible permanent label identifying the SATAjet 4000 B RP spray gun body is attached to the gun body on all SATAjet 4000 B RP digital and non-digital spray guns used.
5. SATA shall supply written notification to each individual purchasing a SATAjet 4000 B RP digital or non-digital spray gun for use within the Denver ozone non-attainment area indicating that its use is only approved when operated under the conditions specified in this letter.
6. The operator can produce a copy of this letter for inspection by the Division or local agency personnel upon their request.
7. Only the SATAjet 4000 B RP (non-digital) and SATAjet 4000 B RP Digital spray guns are covered by this approval.

Please note that the Division is making this determination based on a reliance on the validity and accuracy of the information that SATA provided in its transmittal. Please do not hesitate to contact me at 303-692-3252 or Roland.Hea@state.co.us if you have any questions regarding this letter or would like to further discuss this issue. Thank you.

Sincerely,



Roland C. Hea, P.E.
Permitting Section Supervisor
Stationary Sources Program
Air Pollution Control Division
APCD-SS-B1

cc: Mr. Matt Burgett – APCD (all cc: via e-mail only)
Mr. Paul Carr – APCD
Mr. R K Hancock III – APCD
Mr. Robert Jorgenson – APCD

Mr. Georg Drakos

Approval for SATAjet 4000 B RP and SATAjet 4000 B RP Digital Spray Guns

Ms. Kirsten King – APCD

Ms. Shannon McMillan – APCD

Dr. Ewald Schmon – SATA

Ms. Susanne Walters – SATA