

Mr. Ky Asral
Supervising Environmental Engineer
New Jersey Department of Environmental Protection
Small Business Assistance Program
PO Box 423
Trenton, NJ 08625-0423

Re: Request to use EPA approved non-HVLP spray gun.

Dear Mr. Asral:

In accordance with N.J.A.C. 7:27-16.12(f)10, I am requesting written affirmation from the NJDEP to use the following EPA approved non-HVLP spray gun at my mobile equipment refinishing facility:

Make & Model of EPA approved non-HVLP spray gun

The VOC emissions resulting from this spray gun for mobile equipment refinishing does not exceed the emissions that would result from either the HVLP or electrostatic spray application methods. Please find the attached EPA approval as evidence that this spray gun meets New Jersey's VOC emission requirements.

Sincerely,

Print Name

Title

Phone Number

Date

Facility Name

Facility Address

Facility Address

Facility Address

THE ENVIRONMENTAL TECHNOLOGY VERIFICATION PROGRAM



ETV JOINT VERIFICATION STATEMENT

TECHNOLOGY TYPE:	HIGH TRANSFER EFFICIENCY (TE) LIQUID COATING SPRAY APPLICATION EQUIPMENT		
APPLICATION:	LIQUID ORGANIC COATINGS APPLICATION IN AUTOMOTIVE REFINISHING		
TECHNOLOGY NAME:	W400-LV		
COMPANY:	ANEST IWATA Corporation		
POC:	Dr. N. Morita Automotive Industry Group Coating Equipment Department		
ADDRESS:	3176, Shinyoshida-cho, Kohoku-ku Yokohama 223-8501 Japan	PHONE:	81-(0)-45-591-1118
		FAX:	81-(0)-45-591-1137
EMAIL:	nmorita@anest-iwata.co.jp		

The United States Environmental Protection Agency (EPA) has created the Environmental Technology Verification Program (ETV) to facilitate the deployment of innovative or improved environmental technologies through performance verification and dissemination of information. The goal of the ETV Program is to further environmental protection by substantially accelerating the acceptance and use of improved, cost-effective technologies. ETV seeks to achieve this goal by providing high-quality, peer-reviewed data on technology performance to those involved in the design, distribution, financing, permitting, purchase, and use of environmental technologies.

ETV works in partnership with recognized standards and testing organizations, stakeholder groups consisting of buyers, vendor organizations, and states, and with the full participation of individual technology developers. The program evaluates the performance of innovative technologies by developing test plans that are responsive to the needs of stakeholders, conducting field or laboratory tests (as appropriate), collecting and analyzing data, and preparing peer-reviewed reports. All evaluations are conducted in accordance with rigorous quality assurance protocols to ensure that data of known and adequate quality are generated and that the results are defensible.

The ETV Coatings and Coating Equipment Program (CCEP), one of seven technology areas under the ETV Program, is operated by Concurrent Technologies Corporation (CTC) under the National Defense Center for Environmental Excellence (NDCEE), in cooperation with EPA's National Risk Management Research Laboratory. The ETV CCEP has recently evaluated the performance of high transfer efficiency spray guns for automotive refinishing applications. This verification statement provides a summary of the test results for the W400-LV high TE spray gun, manufactured by ANEST IWATA.

VERIFICATION TEST DESCRIPTION

The ETV CCEP evaluated the pollution prevention capabilities of a high transfer efficiency (TE) liquid spray gun. The test was conducted under representative factory conditions at *CTC*. It was designed to verify the environmental benefit of the high-TE spray gun with specific quality requirements for the resulting finish. The finish quality applied by the W400-LV gun was tested for comparability to the finish quality obtained by two baseline high-volume, low-pressure (HVLP) spray guns. If a high-TE spray gun cannot provide an acceptable finish while operating at efficiencies representative of HVLP spray guns, the end users may have a tendency to raise the input air pressure to meet their finishing requirements. However, these adjustments may reduce the environmental benefits of the high-TE spray gun. These environmental benefits include a reduction in paint usage and a subsequent reduction of VOC/HAP emissions and solid waste disposal cost when compared to traditional low-efficiency air spray guns.

In this test, the W400-LV high-TE spray gun was tested under conditions recommended by ANEST IWATA, the gun's manufacturer. Two groups of targets were used. The first (large target) group consisted of 36 in. x 36 in. steel backboard panels, which were covered with heavy duty aluminum foil and suspended on a stand using magnets, and 12 in. x 18 in. steel finish quality panels. Three foils were coated for each gun and coating combination to determine the gun's TE. Then, the backboards were recovered with foil and three finish quality panels were coated, which were held in place on the surface of the backboards by the same magnets that held the backboards to the stand. The application pattern for all guns did not produce any direct overspray (i.e., there was no lead, lag, or overlap beyond the edges of the backboard. The second (small target) group consisted of 5 in. x 12 in. steel TE/finish quality panels. These panels were also attached to a stand using magnets. Three small panels were coated separately for each gun/coating combination and were used to determine both TE and finish quality. The application pattern for all guns allowed 50% of the first and last passes to be above and below the panel, respectively. The spray guns were mounted on a robotic translator to increase accuracy and repeatability of the test. The translator can move the spray gun horizontally or vertically. The TE improvement of the W400-LV spray gun over a HVLP gun baseline was verified using American Society for Testing and Materials (ASTM) method D 5286. The W400-LV and HVLP baseline guns were all gravity-feed guns. The finish quality data was incorporated to validate the comparison of the W400-LV and HVLP baseline TE data.

The details of the test, including a summary of the data and a discussion of results, may be found in Chapters 4 and 5 of "Environmental Technology Verification Report – ANEST IWATA Corporation W400-LV Spray Gun," published by *CTC*. Contact Robert J. Fisher of *CTC* at (814) 269-2702 to obtain copies of this statement, the Verification Report, or the Data Notebook. The Verification Statement and Report may also be accessed via the Internet at <http://www.epa.gov/etv/verifications/verification-index.html>.

TECHNOLOGY DESCRIPTION

The W400-LV spray gun was tested, as received from ANEST IWATA, to assess its capabilities. The W400-LV is not an HVLP gun, but is claimed to provide a TE equivalent or better than HVLP spray guns. The gun was equipped with a W-400-LV4 air cap and a 1.4 mm (0.055 in.) fluid tip. Because the W400-LV spray gun is marketed to automotive refinishers, ANEST IWATA selected a three part coating system manufactured by PPG, which included the NCP-280 primer, the DBC-16640 basecoat, and the DCU-2010 clearcoat.

More information on the spray gun, including recommended air caps and fluid tips for various paint formulations, is available from ANEST IWATA. At the time of this verification test, the list price of the W400-LV spray gun was \$410.

VERIFICATION OF PERFORMANCE

The performance characteristics of the W400-LV spray gun included the following:

Environmental Factors

- Transfer Efficiency (TE): The TE was determined per ASTM D 5286. The following TEs and associated standard deviations were obtained using large foil covered steel backboards:

	Primer		Basecoat		Clearcoat	
	TE (%)	Std. Dev.	TE (%)	Std. Dev.	TE (%)	Std. Dev.
W400-LV	84.9	0.5	59.9	0.8	77.0	0.4
HVLP #1	84.5	0.7	57.0	1.2	77.2	1.6
HVLP #2	83.0	0.7	56.5	1.2	73.5	0.4

The next set of TEs and standard deviations were obtained using small steel panels.

	Primer		Basecoat		Clearcoat	
	TE (%)	Std. Dev.	TE (%)	Std. Dev.	TE (%)	Std. Dev.
W400-LV	30.8	1.1	18.6	0.2	30.0	0.3
HVLP #1	31.4	0.2	15.7	0.1	26.6	0.3
HVLP #2	27.9	0.7	13.7	0.3	27.1	0.4

The W400-LV was statistically equivalent to or better than the two HVLP guns at the 95% confidence interval.

Marketability Factors

- Dry Film Thickness (DFT): The DFT data was obtained per ASTM B 499. Based on recommendations in PPG's product data sheets, the following target DFTs were established for the three coatings: Primer, 1.0 – 1.5 mils in one coat; Basecoat, 0.2 – 0.3 mils in one coat; and Clearcoat, 2.0 – 2.5 mils in two coats. DFTs for all tests were determined from multiple points measured on each finish quality panel. The following DFTs and associated standard deviations were obtained during this test:

	Primer		Basecoat		Clearcoat	
	Large	Small	Large	Small	Large	Small
	DFT/Std. Dev. (mils)	DFT/Std. Dev. (mils)	DFT/Std. Dev. (mils)	DFT/Std. Dev. (mils)	DFT/Std. Dev. (mils)	DFT/Std. Dev. (mils)
W400-LV	0.8/0.1	0.5/0.1	0.3/0.0	0.2/0.1	1.9/0.1	2.1/0.2
HVLP #1	0.6/0.1	0.7/0.1	0.3/0.0	0.3/0.0	2.1/0.1	2.2/0.1
HVLP #2	0.6/0.1	0.8/0.1	0.3/0.0	0.3/0.0	1.8/0.1	1.6/0.1

- Gloss: The gloss was measured per ASTM D 523 at multiple points on each finish quality panel. The test method has a range of 0-100 gloss units. The following gloss values and associated standard deviations were obtained during this test:

	Primer		Basecoat		Clearcoat	
	Large	Small	Large	Small	Large	Small
	Gloss/Std. Dev.	Gloss/Std. Dev.	Gloss/Std. Dev.	Gloss/Std. Dev.	Gloss/Std. Dev.	Gloss/Std. Dev.
W400-LV	22 / 2	12 / 3	22 / 1	26 / 1	83 / 0	87 / 0
HVLP #1	14 / 4	19 / 4	23 / 0	24 / 0	84 / 1	88 / 1
HVLP #2	12 / 3	22 / 3	22 / 1	28 / 0	77 / 1	86 / 0

- Distinctness-Of-Image (DOI): The DOI was measured per ASTM D 5767 Test Method B at one point on each finish quality panel. . DOI provides another measure of a coating's finish quality. The DOI analyses were performed by ACT Laboratories, Inc., of Hillsdale, MI. The sliding comb shutter was replaced with an eight-bladed rotating disc. The test method has a range of 0-100 DOI units. The following DOI values and associated standard deviations were obtained during this test:

	Primer		Basecoat		Clearcoat	
	Large	Small	Large	Small	Large	Small
	DOI/Std. Dev.	DOI/Std. Dev.	DOI/Std. Dev.	DOI/Std. Dev.	DOI/Std. Dev.	DOI/Std. Dev.
W400-LV	23 / 1	23 / 0	26 / 0	28 / 0	61 / 2	74 / 6
HVLP #1	23 / 1	23 / 0	27 / 0	27 / 0	62 / 3	72 / 3
HVLP #2	24 / 1	23 / 0	26 / 1	28 / 0	36 / 1	67 / 1

- Visual Appearance: CTC personnel assessed the visual appearance of all finish quality panels. The intent of this analysis was to identify any obvious coating abnormalities that could be attributed to the application equipment. The visual appearance of the coating was found to be acceptable with no obvious visual abnormalities that would render the coating unacceptable for its intended application.

SUMMARY

The operating conditions used for the three spray guns varied slightly, however, the goal was to obtain a comparable finish quality under representative conditions for each specific gun. The finish quality data indicate that the applied coating characteristics were comparable among the three guns. The test results also show that the W400-LV spray gun provides an environmental benefit comparable to HVLP spray equipment by providing the end user with the same or improved transfer efficiency as HVLP. As with any technology selection, the end user must select appropriate paint spray equipment for a process that can meet the associated environmental restrictions, productivity, and coating quality requirements.

Original signed on
9/28/2004

Lawrence W. Reiter PhD
Acting Director
National Risk Management Research Laboratory
Office of Research and Development
U.S. Environmental Protection Agency

Original signed on
9/30/2004

Brian D. Schweitzer
Manager
ETV CCEP
Concurrent Technologies Corporation

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