



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

DEVAL L. PATRICK  
Governor

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Commissioner

February 8, 2008

Mr. Mark Hebbeler  
North American Marketing Manager  
ANEST IWATA USA, Inc.  
9920 Windisch Road  
West Chester, OH 45069

Dear Mr. Hebbeler:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Prevention, Business Compliance Division has received your request, pursuant to 310 CMR 7.03(16)(d)3, for approval to sell the ANEST IWATA W400-LV spray gun for use in Massachusetts, dated January 18, 2008. 310 CMR 7.03(16)(d)3 allows for the use of ... "other coating application method(s) that achieves a transfer efficiency equivalent to electrostatic or HVLP spray application and is approved by the Department in writing."

Review of the submitted information demonstrates that the ANEST IWATA W400-LV spray gun was approved for use in the South Coast Air Quality Management District (SCAQMD) in a letter dated February 17, 2006. The ANEST IWATA W400-LV spray gun was tested according to the following procedures:

1. SCAQMD "Spray equipment Transfer Efficiency Test Procedure For Equipment Users" (May 24, 1989)
2. SCAQMD "Guidelines For Demonstrating Equivalency with District Approved Transfer Efficiency Spray Guns" (September 26, 2002)

Based on the results of SCAQMD testing and SCAQMD's approved use of the ANEST IWATA W400-LV spray gun, you have documented to the satisfaction of MassDEP that the transfer efficiency of the tested model is equal to or greater than high volume-low pressure (HVLP) spray equipment. Therefore, the ANEST IWATA W400-LV spray gun is approved for operations subject to 310 CMR 7.03(16) (Plan Application Exemption Requirements for Paint Spray Booths) and 310 CMR 7.18(28) (Automotive Refinishing RACT), provided the following conditions are met:

ANEST IWATA shall supply with each ANEST IWATA W400-LV spray gun sold or distributed for use within the Commonwealth of Massachusetts the following:

1. Written notification that the maximum air pressure supplied to the spray gun shall not exceed 20 psig.
2. An ANEST IWATA AK-1B airflow control valve and pressure gauge (Item #8130) clearly identifying the maximum allowable spray gun inlet air pressure of 20 psig.
3. Written notification that the ANEST IWATA AK-1B airflow control valve and pressure gauge (Item #8130) shall be attached to the spray gun, and be in good working condition, whenever the spray gun is in use.

If you have any questions concerning this approval, please contact Paul Reilly of my staff at (617) 556-1097.

Very truly yours,



Steven A. DeGabriele, Director  
Business Compliance Division  
Bureau of Waste Prevention

cc: BWP, Regional C/E Chiefs  
BWP, Regional Permit Chiefs