



State of Ohio Environmental Protection Agency

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MAY 23 2006

Mr. Mark J. Hebbeler
Marketing Manager
ANEST IWATA USA, Inc.
9920 Windisch Road
West Chester, Ohio 45069

Re: ANEST IWATA W400-LV spray gun transfer efficiency vs HVLP

Dear Mr. Hebbeler

Per your request during your phone conversation with Lee Burkleca, Ohio EPA Division of Air Pollution Control (DAPC) has reviewed documents previously submitted to demonstrate that the ANEST IWATA W400-LV spray gun has equivalent or better transfer efficiency than high-volume low pressure spray technology (HVLP). These documents were hand delivered to DAPC by staff from Ohio EPA's Southwest District Office. You indicated that Ohio EPA's concurrence 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."

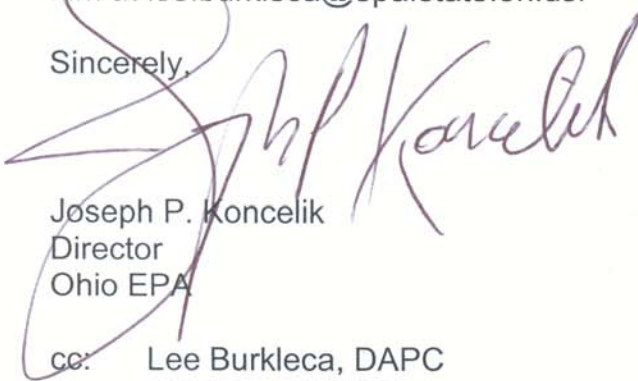
Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

Ohio EPA concurs that the results of the transfer efficiency testing indicate the ANEST IWATA W400-LV spray gun is capable of achieving equivalent or better transfer efficiency than HVLP equipment. These results were summarized in the "Environmental Technology Verification Report" prepared by the National Defense Center for Environmental Excellence and dated September 2004. In addition, Ohio EPA has reviewed the letter dated February 17, 2006 from the South Coast Air Quality Management District which also approved the use of this spray gun for similar rule requirements. The conditions (1-5) of approval set forth in that letter shall also be required for Ohio EPA's approval and shall apply to any equipment sold in Ohio.

By means of this letter we are approving the use of the ANEST IWATA W400-LV spray gun 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 USEPA 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