

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

April 25, 2006

Mr. Kuniyisa Tomita
President
ANEST IWATA USA, Inc.
9920 Windisch Road
West Chester, Ohio 45069

Re: ANEST IWATA – Request for RACT Equivalency Determination for W400-LV Spray Gun

Dear Mr. Tomita:

The Air Pollution Control Division (the Division) has reviewed your request dated March 6, 2006 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for ANEST IWATA USA, Inc.'s (ANEST IWATA's) W400-LV spray gun. In your submittal, you provided results from a transfer efficiency test conducted through the U.S. Environmental Protection Agency Environmental Technology Verification program and a copy of an approval letter from the South Coast Air Quality Management District (California).

Colorado Air Quality Control Commission (AQCC) Regulation Nos. 3 and 7 establish RACT requirements for sources in the Denver 1-Hour Ozone Attainment/Maintenance Area. The Denver 1-Hour Ozone Area is composed of Denver, Jefferson, Douglas, Broomfield and Boulder (excluding Rocky Mountain National Park) Counties plus the portions of Arapahoe and Adams Counties west of Kiowa Creek.

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 1-Hour Ozone 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 performed indicate that the ANEST IWATA W400-LV spray gun is capable (under specified operating parameters) of achieving equivalent or better transfer

efficiency than HVLP spray equipment. Based on this review, the Division approves its use under the following conditions:

1. The air pressure supplied to the ANEST IWATA W400-LV spray gun is equal to or less than 20 pounds per square inch gauge (psig).
2. An ANEST IWATA AK-1B air flow control valve and pressure gauge (Item # 8130) is attached to the W400-LV spray gun and is in good working condition during actual operation. The gauge must clearly indicate that the maximum air pressure to be used for this spray gun is 20 psig and the spray gun must be operated as such.
3. ANEST IWATA shall supply written notification to each individual purchasing a W400-LV spray gun for use within the Denver 1-Hour Ozone Area indicating that its use is only approved when operated under the conditions specified in this letter.
4. The operator can produce a copy of this letter for inspection by the Division or local agency personnel upon their request.
5. Only the ANEST IWATA W400-LV spray gun model is 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 ANEST IWATA 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. Paul Carr – APCD (All cc: via e-mail)
Mr. R K Hancock III – APCD
Mr. Robert Jorgenson – APCD
Ms. Kirsten King – APCD
Ms. Shannon McMillan – APCD