

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

May 14, 2013

Mr. Mark Hebbeler
Marketing and Sales Director
ANEST IWATA USA, Inc.
5325 Muhlhauser Road
West Chester, Ohio 45011

Re: Request for RACT Equivalency Determination for ANEST IWATA WS400 High Transfer Efficiency Spray Gun

Dear Mr. Hebbeler:

The Air Pollution Control Division (the Division) has reviewed your request dated March 28, 2013 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for ANEST IWATA USA, Inc.'s (ANEST IWATA's) WS400 spray gun. In your submittal, you provided a copy of a January 15, 2013 Maximum Achievable Control Technology, 40 CFR Part 63, Subpart HHHHHH approval letter from the U.S. Environmental Protection Agency (EPA) and a copy of an October 30, 2012 approval letter from the South Coast Air Quality Management District (California). ANEST IWATA 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.

Mr. Mark Hebbeler
Approval for ANEST IWATA WS400 Spray Gun

The results of the transfer efficiency testing referenced in the EPA and South Coast Air Quality Management District approval letters indicate that the ANEST IWATA WS400 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 WS400 spray gun is equal to or less than 29 pounds per square inch gauge (psig).
2. An appropriate air flow control valve or regulator, along with a pressure gauge, supplied by ANEST IWATA, is attached to the ANEST IWATA WS400 spray gun and is in good working condition during actual operation.
3. A clearly visible permanent label specifying that the inlet air pressure shall not exceed 29 psig is attached to all ANEST IWATA WS400 spray guns used.
4. A clearly visible permanent label identifying the ANEST IWATA WS400 spray gun body is attached to the gun body on all ANEST IWATA WS400 spray guns used.
5. ANEST IWATA shall supply written notification to each individual purchasing an ANEST IWATA WS400 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 ANEST IWATA WS400 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: Ms. Marley Bain – APCD (all cc: via e-mail only)
Mr. Matt Burgett – APCD
Mr. Paul Carr – APCD
Mr. R K Hancock III – APCD
Ms. Kirsten King – APCD
Ms. Shannon McMillan – APCD