

# 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

September 11, 2012

Mr. Jörn Stöver  
Export Sales Manager Overseas  
SATA GmbH & Co. KG  
Domertalstraße 20  
70806 Kornwestheim  
Germany

Re: Request for RACT Equivalency Determination for SATAjet 100 B P Spray Gun

Dear Mr. Stöver:

The Air Pollution Control Division (the Division) has reviewed your request dated August 21, 2012 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for SATA GmbH & Co. KG's (SATA's) SATAjet 100 B P spray gun. In your submittal, you provided a copy of a August 14, 2012 approval letter from the South Coast Air Quality Management District (California), and the results from a transfer efficiency test. SATA 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.