

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

TIMOTHY P MURRAY Lieutenant Governor GL
KL
TL
F&E

Eingang

0 3. Dez. 2012

KLE
KLF
VKA
VKI

RICHARD K SULLIVAN JR

KENNETH L KIMMELL

Commissioner

November 20, 2012

Dr. Ewald Schmon
R & D Manager
SATA Farbspritztechnik GmbH & Cover Cover

Subject: HVLP Equivalency of SATAjet 100 B F RP, SATAjet 100 B P, and

SATAjet 1000 B RP Spray guns

Dear Dr. Schmon:

The Massachusetts Department of Environmental Protection (MassDEP) has received your request, pursuant to 310 CMR 7.03(16)(d)3, for approval to sell the SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray guns for use in Massachusetts, dated August 21, 2012. 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 SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray guns were approved for use in the South Coast Air Quality Management District (SCAQMD) in letters dated August 14, 2012. The SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray guns were 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 SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray guns, you have documented to the satisfaction of MassDEP that the transfer efficiency of the tested models is equal to or greater than high volume-low pressure (HVLP) spray equipment. Therefore, the SATAjet 100 B F RP,

SATAjet 100 B P, and SATAjet 1000 B RP spray guns are 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). This approval is subject to the following conditions:

- 1. This approval is valid only if the air pressure supplied to the SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray guns is no greater than 32 psig.
- 2. SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray gun sold or distributed for use within the Commonwealth of Massachusetts written notification that the maximum air pressure supplied to the spray gun shall not exceed 32 psig.
- 3. SATA Farbspritztechnik GmbH & Co. KG shall supply a clearly visible label specifying that the inlet air pressure shall not exceed 32 psig permanently attached to all SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray guns.
- 4. SATA Farbspritztechnik GmbH & Co. KG shall supply a SATA air micrometer with gauge 0/8455 (product number 27771), SATA adam digital air micrometer with gauge (product number 130146), or SATA adam 2 digital air micrometer with gauge (product number 160853) with each SATAjet 100 B F RP, SATAjet 100 B P, and SATAjet 1000 B RP spray gun.
- 5. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification that one of the air micrometer with gauge options specified in condition 4 shall be attached to the SATAjet 100 B F RP, SATAjet 100 B P, or SATAjet 1000 B RP 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,

Glenn Keith, Deputy Director

of Air and Climate Programs Division

Bureau of Waste Prevention

cc: Mr. Jörn Stöver

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