



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 8468

Harrisburg, PA 17105-8468

April 12, 2004

Bureau of Air Quality

717-787-9257

Dr. Ewald Schmon
R&D Manager
SATA Farbspritztechnik GmbH & Co. KG
Domertalstrasse 20
70806 Kornwestheim, Germany

CERTIFIED MAIL NO: 7000 1670 0002 7922 9897

Dear Dr. Schmon:

The Pennsylvania Department of Environmental Protection (Department) has completed its review of the information submitted with your request for a determination by the Department that the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models achieve emission reductions equivalent to high volume low pressure (HVLP) or electrostatic spray application methods. Your request was made under 25 Pa. Code Section 129.75(e)(10) (relating to application equipment for mobile equipment repair and refinishing). The Department considered the information included in your original letter of December 18, 2003, and the additional information included in the letter of February 13, 2004, and the accompanying CD-ROM.

Based upon the information you provided, the Department has determined that the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models are capable of achieving emission reductions equivalent to HVLP or electrostatic spray application methods under 25 Pa. Code Section 129.75(e)(10). This determination authorizes the use of the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models for the application of coatings listed in Table III of 25 Pa. Code Section 129.75(c), in the Commonwealth of Pennsylvania, subject to the following conditions:

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models for use in the Commonwealth of Pennsylvania. The notice shall specify that the Department has determined that the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models are equivalent to HVLP or electrostatic spray application methods only for the application of coatings listed in Table III of 25 Pa. Code Section 129.75.
2. This authorization is valid only if the air pressure supplied to the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models is equal to or less than 35 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person



purchasing the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models for use in the Commonwealth of Pennsylvania. The notice shall specify that the operation of the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models at an inlet air pressure greater than 35 psig for application of coatings listed in Table III of 25 Pa. Code Section 129.75(c) constitutes a violation of 25 Pa. Code Section 129.75(e)(10).

3. SATA Farbspritztechnik GmbH & Co. KG shall supply a SATA compressed air micrometer with gauge 0/8455 (product number 27771) modified to clearly identify the maximum allowable spray gun inlet air pressure (35 psig) to each person purchasing a SATAjet RP non-digital spray gun model for use in the Commonwealth of Pennsylvania. The required modification shall provide a visual confirmation that the maximum allowed air pressure is 35 psig such as color-coding the gauge to make the area of the gauge at and below 35 psig green and the area of the gauge above 35 psig red or other design approved by the Commonwealth of Pennsylvania. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet RP non-digital spray gun model for use in the Commonwealth of Pennsylvania. The notice shall specify that failure to have the SATA compressed air micrometer with gauge 0/8455 (product number 27771), modified as described above, attached to the spray gun and in good working condition whenever the spray gun is in operation constitutes a violation of 25 Pa. Code Section 129.75(e)(10).
4. This authorization does not extend to the use of a SATAjet RP non-digital spray gun that is not equipped with a properly operating SATA compressed air micrometer with gauge 0/8455 (product number 27771) as described in condition number 3.
5. SATA Farbspritztechnik GmbH & Co. KG shall add a clearly visible permanent label specifying that the inlet air pressure shall not exceed 35 psig to all SATAjet RP Digital 2 spray gun models sold or distributed for use within the Commonwealth of Pennsylvania. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet RP Digital 2 spray gun model for use in the Commonwealth of Pennsylvania. The notice shall specify that failure to have the permanent label attached to the spray gun whenever the spray gun is in operation constitutes a violation of 25 Pa. Code Section 129.75(e)(10).
6. This authorization does not extend to the use of a SATAjet RP Digital 2 spray gun that is not labeled as described in condition number 5.
7. This authorization is valid only for the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models described in the information submitted to the Department on December 18, 2003, and February 13, 2004.
8. In the event SATA Farbspritztechnik GmbH & Co. KG fails to comply with the conditions set forth in this letter, this authorization shall terminate and SATA Farbspritztechnik GmbH & Co. KG shall immediately discontinue the sale and distribution of the SATAjet RP non-digital and SATAjet RP Digital 2 spray gun models

for use in the Commonwealth of Pennsylvania for the application of coatings listed in Table III of 25 Pa. Code Section 129.75(c).

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in Braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions regarding this approval, please contact Mr. Scott Kepner at 717-772-2330.

Sincerely,



Joyce E. Epps
Director
Bureau of Air Quality

bcc: Krish Ramamurthy
Susan Hoyle
George Liddick
Scott Kepner
Kristen Campfield
Terry Black
Keith Hoffnagle
Walt Brinkman

KR/SLK/SDH:adb