

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 Governor

TIMOTHY P MURRAY Liquidanant Governor

RICHARD K. SULLIVAN JR. Secretary

> KENNETH L. KIMMELL Commissioner

October 24, 2011

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

Dear Dr. Schmon:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Waste Prevention, Business Compliance Division has received your request, pursuant to 310 CMR 7.03(16)(d)3, for approval to sell the SATA jet4000 B RP spray gun and SATA jet4000 B RP Digital spray gun for use in Massachusetts, dated August 19, 2011. 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 SATA jet4000 B RP and SATA jet4000 B RP Digital spray guns were approved for use in the South Coast Air Quality Management District (SCAQMD) in a letter dated June 2, 2011 and by the US EPA in a letter dated July 27, 2011. The SATA jet4000 B RP and SATA jet4000 B RP Digital 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 and US EPA testing and approved use of the SATA jet4000 B RP and SATA jet4000 B RP Digital 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 SATA jet4000 B RP and SATA jet4000 B RP Digital 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 SATA jet4000 B RP and SATA jet4000 B RP Digital spray guns is no greater than 32 psig.
- 2. SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATA jet4000 B RP and SATA jet4000 B RP Digital 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 SATA air micrometer with gauge 0/8455 (product number 27771), a SATA adam digital air micrometer with gauge (product number 130146), or a SATA adam 2 digital air micrometer with gauge (product number 160853) with each standard (non-digital) SATA jet4000 B RP spray gun.
- 4. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification that one of the air micrometers with gauge options specified in condition 3 shall be attached to the SATA jet4000 B RP spray gun, and be in good working condition, whenever the spray gun is in use.
- 5. 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 SATA jet4000 B RP and SATA jet4000 B RP Digital spray guns.

If you have any questions concerning this approval, please contact Paul Reilly of my staff at (617) 556-1097.

Very truly yours,

Steven A. DeGabriele, Director **Business Compliance Division**

Bureau of Waste Prevention

Christian Bunk cc:

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