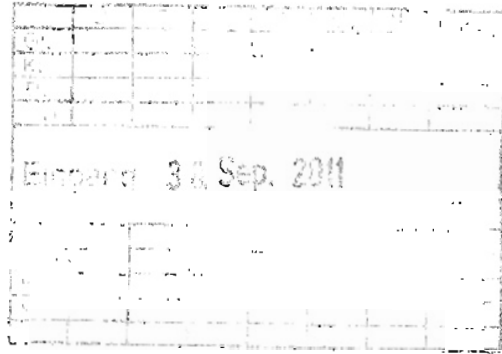




**Environmental
Protection Agency**

John Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director



SEP 19 2011

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

Re: SATAjet 4000 B RP non-digital and digital spray gun transfer efficiency vs HVLP

Dear Herr Schmon:

This letter is in response to your e-mail request dated August 25, 2011, in which Ms. Susanne Walters requested written approval to sell and operate the SATAjet 4000 B RP non-digital and digital spray gun in Ohio, USA pursuant to Ohio Administrative Code (OAC) 3745-21-18(C)(l)(k). Ohio EPA Division of Air Pollution Control (DAPC) has reviewed your request, which also included the approval letters from the U.S. EPA Office of Air Quality Planning and Standards dated July 27, 2011 and from the South Coast Air Quality Management District (SCAQMD), dated June 2, 2011.

OAC rule 3745-21-18(C)(1) provides that a person at a facility located in an affected County*, specified in OAC rule 3745-27-18(A), subject to the requirements of the rule, shall use one or more of the listed application techniques in accordance with manufacturer's specifications. This rule also allows a person to use an equivalent application technique. OAC rule 3745-21-18(C)(l)(k) allows for the use of:

"Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the director shall be submitted to the U.S. Environmental Protection Agency, as a revision to the Ohio state implementation plan for ozone."

Ohio EPA agrees that the results of the transfer efficiency testing you submitted to U.S. EPA and the SCAQMD, and their subsequent approvals, indicates that the SATAjet 4000 B RP non-digital and digital spray gun is capable of achieving equivalent or better transfer efficiency than HVLP equipment (greater than 65%). This approval is also subject to the following conditions (as found in the U.S. EPA and SCAQMD's approval letters) and shall apply to any equipment sold and operated in the affected counties in Ohio:

- a. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 4000 B RP or SATAjet 4000 B RP Digital spray gun sold or distributed for use within the jurisdiction of the affected counties in Ohio that the spray gun is only

approved as providing equivalent transfer efficiency as HVLP spray guns for the application of coatings subject to OAC Chapter 3745-21-18.

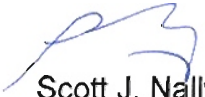
- b. This approval is only valid if the air pressure supplied to the SATAjet 4000 B RP and the SATAjet 4000 B RP Digital spray guns is equal to or less than 32 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet 4000 B RP or SATAjet 4000 B RP Digital spray gun sold or distributed for use within the jurisdiction of the affected counties in Ohio that the maximum air pressure supplied to the spray gun shall not exceed 32 psig.
- c. SATA Farbspritztechnik GmbH & Co. KG shall supply a SATA air micrometer with gauge 018455 (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 standard (non-digital) SATAjet 4000 B RP spray gun sold or distributed for use within the jurisdiction of the affected counties in Ohio. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each standard (non-digital) SATAjet 4000 B RP spray gun sold or distributed that the SATA air micrometer with gauge 018455 (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) shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation for the application of coatings subject to OAC Chapter 3745-21-18. The digital SATAjet 4000 B RP spray gun has integrated air micrometers in the handle and are not required to have a separate air micrometer.
- d. SATA Farbspritztechnik GmbH & Co. KG shall provide written notification to buyers/users of the standard (non-digital) SATAjet 4000 B RP spray gun that they must be equipped with a properly operating SATA air micrometer as described in condition (c) and that they must be operated at less than or equal to 32 psig when they are used for applying coatings subject to OAC Chapter 3745-21-18.
- e. SATA Farbspritztechnik GmbH & Co. KG shall add a clearly visible permanent label specifying that the inlet air pressure shall not exceed 32 psig to all SATAjet 4000 B RP and SATAjet 4000 B RP Digital spray guns sold or distributed for use within the jurisdiction of the affected counties in Ohio
- f. This approval is only valid if during actual operation the SATAjet 4000 B RP and SATAjet 4000 B RP Digital spray guns are operated as described in condition (c), labeled as described in condition (e), and operated at or below the operating pressure as specified in condition (b).
- * In the Cincinnati and Dayton metropolitan areas; Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren Counties. In the Cleveland metropolitan areas; Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage and Summit Counties.

By means of this letter I am approving the use of the SATAjet 4000 B RP non-digital and digital spray guns as an equivalent coating application method. Ohio EPA, as time allows,

will revise OAC rule 3745-21-18 to include these spray gun as an acceptable coating application method and will submit the modified rule to the US EPA as a revision to the Ohio State Implementation Plan (SIP) for ozone. Prior to this rule revision, Ohio EPA plans to add a link on our website for this rule which will indicate that these spray guns have been approved as an equivalent method to HVLP.

If you have any additional questions, please call Lee F. Burkleca at 614-728-1 344 or e-mail him at lee.burkleca@epa.state.oh.us.

Sincerely,



Scott J. Nally
Director, Ohio EPA

Cc: Lee Burkleca, DAPC