

MITT ROMNEY Governor

KERRY HEALEY Lieutenant Governor

COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS DEPARTMENT OF ENVIRONMENTAL PROTECTION

ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

ROBERT W. GOLLEDGE, Jr. Secretary

ARLEEN O'DONNELL Commissioner

October 10, 2006

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 jet3000 RP spray gun and SATA jet3000 RP Digital spray gun for use in Massachusetts, dated September 12, 2006. 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 jet3000 RP and SATA jet3000 RP Digital spray guns were approved for use in the South Coast Air Quality Management District (SCAQMD) in a letter dated August 23, 2006. The SATA jet3000 RP and SATA jet3000 RP Digital spray guns were tested according to the following procedures:

- 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 SATA jet3000 RP and SATA jet3000 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 jet3000 RP and SATA jet3000 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), provided the following conditions are met:

SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATA jet3000 RP spray gun sold or distributed for use within the Commonwealth of Massachusetts the following:

- 1. Written notification that the maximum air pressure supplied to the spray gun shall not exceed 35 psig.
- 2. A clearly visible label specifying that the inlet air pressure shall not exceed 35 psig permanently attached to all SATA jet3000 RP spray guns.
- 3. A SATA air micrometer with gauge 0/8455 (product number 27771), or an equivalent micrometer with gauge approved by SCAQMD.
- 4. Written notification that the air micrometer with gauge shall be attached to the spray gun, and be in good working condition, whenever the spray gun is in use.

SATA Farbspritztechnik GmbH & Co. KG shall supply with each SATA jet3000 RP Digital spray gun sold or distributed for use within the Commonwealth of Massachusetts the following:

- 1. Written notification that the maximum air pressure supplied to the spray gun shall not exceed 35 psig.
- 2. A clearly visible label specifying that the inlet air pressure shall not exceed 35 psig permanently attached to all SATA jet3000 RP Digital spray guns.
- 3. A SATA adam digital air micrometer with gauge (product number 130146), or an equivalent micrometer with gauge approved by SCAQMD.
- 4. Written notification that the air micrometer with gauge shall be attached to the 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,

Steven A. DeGabriele, Director Business Compliance Division Bureau of Waste Prevention

cc: Christian Bunk BWP, Regional C/E Chiefs BWP, Regional Permit Chiefs