



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

Mr. Tony Larimer  
Director of Sales and Marketing  
Dan-Am Company  
1 SATA Drive  
Spring Valley, Minnesota 55975

MAY 23 2011

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Mr. Larimer:

This letter is in response to your request for approval of the non-digital and digital versions of the SATAjet RP, SATAjet 3000 RP, and SATAjet 3000 B RP spray guns, hereinafter referred to as the SATAjet spray guns, as equivalent to the transfer efficiency achieved by high-volume, low-pressure (HVLP) spray guns, for use when spray applying automotive refinish coatings under Clean Air Act regulations, subpart HHHHHH of 40 Code of Federal Regulations (CFR) Part 63. These spray guns are approved, with conditions outlined below, for operations subject to the regulations cited below.

We have completed our review of your reports entitled:

“Evaluation of the SATAjet RP non-digital and Digital 2 spray gun for use in the South Coast Air Quality Management District (SCAQMD)” dated August 8, 2003 including the supplemental information dated October 15, 2003 and November 4, 2003, and

“Evaluation of the SATAjet3000 RP non-digital and Digital spray gun for use in the South Coast Air Quality Management District (SCAQMD)” dated March 21, 2006 including the supplemental information dated May 23, 2006, June 13, 2006, and June 21, 2006.

The results of the transfer efficiency testing performed indicate that the SATAjet spray guns are capable of achieving equivalent or better transfer efficiency than HVLP spray equipment. As a result, the SATAjet spray guns are approved for operations subject to §63.11173(e)(3) of 40 CFR Part 63 Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions.

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet spray gun sold or distributed that the spray gun is approved as providing equivalent transfer efficiency as HVLP spray guns for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH. The written notification may be including a copy of this approval letter with the documentation provided to the purchaser of the spray gun.

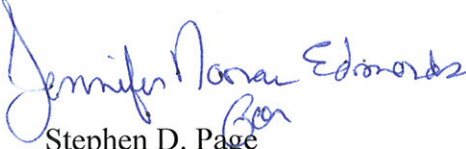
2. This approval is only valid if the air pressure supplied to the SATAjet spray gun is equal to or less than 35 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each SATAjet spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 35 psig for the application of coatings subject to 40 CFR Part 63 Subpart HHHHHH.

3. SATA Farbspritztechnik GmbH & Co. KG shall supply a 1) SATA air micrometer with gauge 0/8455 (product number 27771) modified to clearly identify the maximum allowable spray gun inlet air pressure, 2) Adam digital air micrometer, or 3) Adam 2 digital air micrometer with each standard (non-digital) SATAjet spray gun sold or distributed. The required modification for the SATA air micrometer with gauge 0/8455 (product number 27771) shall provide a visual confirmation that the maximum allowed air pressure is 35 psig. An example of this visual confirmation may be color coding the gauge such that the area above 35 psig is red. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification with each standard (non-digital) SATAjet spray gun sold or distributed that the 1) SATA air micrometer with gauge 0/8455 (product number 27771) modified as described above, 2) Adam digital air micrometer, or 3) Adam 2 digital air micrometer 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 40 CFR Part 63 Subpart HHHHHH. The digital SATAjet spray guns have integrated air micrometers in the handle and are not required to have a separate air micrometer.

4. SATA Farbspritztechnik GmbH & Co. KG shall provide written notification to buyers/users of the standard (non-digital) SATAjet spray gun that they must be equipped with a properly operating SATA air micrometer as described in condition number 3 and that they must be operated at less than or equal to 35 psig when they are used for applying coatings subject to 40 CFR Part 63 Subpart HHHHHH.

If you have any questions regarding this approval, please contact Kim Teal, of my staff, at (919) 541-5580 or [teal.kim@epa.gov](mailto:teal.kim@epa.gov).

Sincerely,

  
for Stephen D. Page  
Director  
Office of Air Quality Planning  
and Standards