



May 09, 2019

Ms. Simone Welz
Assistant Export
SATA GmbH & Co. KG
Domertalstrasse 20
70806 Kornwestheim, Germany

RE: Request for sales approval for SATAjet X 5500 RP spray gun in HVLP mandated areas.

Dear Ms. Welz:

The ICAPCD is in receipt of various emails requesting for sales approval for SATAjet X 5500 RP spray guns in Imperial County.

As mentioned to you in the past, per ICAPCD Rule 427 Automotive Refinishing Operations, states:

C.7 Coating Application Methods

No person shall apply any coating to any motor vehicle, mobile equipment, or associated parts and components unless one of the following application methods is used:

C.7.a Brush, dip or roller.

C.7.b Electrostatic spray.

C.7.c High-Volume Low-Pressure (HVLP) spray equipment

C.7.d Use of a spray gun: If a spray gun is used, the end user must demonstrate that the gun meets the HVLP definition found in Rule 101 Definitions in design and use. A satisfactory demonstration must be based on the manufacturer's published technical material on the design of the gun and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun.

C.7.e Any alternative method that achieves a transfer efficiency equivalent to, or higher than, the application methods listed in sections C.7.a, C.7.b, or C.7.c as determined per section E.9. Written approval from the Executive Officer or Air Pollution Control Officer shall be obtained for each alternative method prior to use.

Section C.7 does not apply to underbody coatings, graphic arts operations, truck bed liner coatings, or any coating use of less than one (1) fluid ounce (29.6 milliliters).

Additionally, Section 427.E.9 states:

E.9 Transfer Efficiency.

Spray equipment transfer efficiency (as specified in the definition for "Transfer Efficiency" found in Rule 101 Definitions and C.7.e) shall be determined by using South Coast Air Quality Management District "Spray Equipment Transfer Efficiency Test Procedures for Equipment User" (May 24, 1989).

In addition, Rule 101, Definitions state:

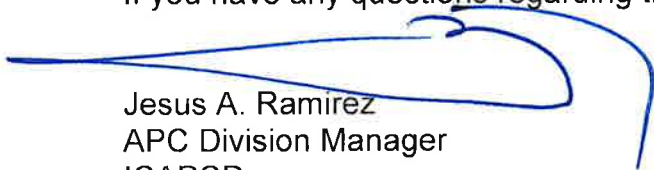
HIGH-VOLUME, LOW-PRESSURE (HVLP): spray Equipment permanently labeled as such and which is designed and operated between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

Your copy of the letter submitted by South Coast AQMD dated October 26, 2018, meets the requirements of Rule 427.E.9.

So based on these information:

Your SATAjetX5500 RP spray guns meets the definition of HVLP, and is approved for use in Imperial County, subject to the conditions stated in SCAQMD letter to SATA dated October 26, 2018.

If you have any questions regarding these information, feel free to contact me.



Jesus A. Ramirez
APC Division Manager
ICAPCD



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
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October 26, 2018

Mr. Dieter Schäfer
Normen-Ing/Approval Eng
SATA GmbH & Co. KG
Domertalstraße 20
70806 Kornwestheim, Germany

Dear Mr. Schäfer:

Subject: Rule 1151 Transfer Efficiency Approval of the SATAjet X 5500 RP Spray Gun (Non-digital and Digital), Application No. 604811

The South Coast Air Quality Management District has completed our review of your report entitled "Evaluation of the SATAjet X 5500 RP paint spray guns for use in the South Coast Air Quality Management District (SCAQMD)" released on August 22, 2018. The results of the transfer efficiency testing performed indicate that the SATAjet X 5500 RP spray guns (non-digital and digital) are capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment. As a result, the SATAjet X 5500 RP spray gun (non-digital and digital) is approved for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, under Rule 1151(d)(6)(A)(v). This approval is subject to the following conditions:

1. SATA GmbH & Co. KG shall supply written notification with each SATAjet X 5500 RP spray gun (non-digital and digital) sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the spray gun is only approved for the application of coatings subject to Rule 1151.
2. This approval is only valid if the air pressure supplied to the SATAjet X 5500 RP spray gun (non-digital and digital) is equal to or less than 29 psig. SATA GmbH & Co. KG shall supply written notification with each SATAjet X 5500 RP spray gun (non-digital and digital) sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District that the maximum air pressure supplied to the spray gun shall not exceed 29 psig.
3. SATA GmbH & Co. KG shall supply a SATA air micrometer with gauge 0/845 (product number 27771), SATA adam 2 digital pressure gauge, SATA adam 2 mini digital pressure gauge, or SATA adam 2 U digital pressure gauge with each SATAjet X 5500 RP spray gun (non-digital) sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District. SATA GmbH &

Co. KG shall supply written notification with each SATAjet X 5500 RP spray gun (non-digital) sold or distributed for use within the jurisdiction of the South Coast Air Quality Management District specifying that SATA air micrometer with gauge 0/845 (product number 27771), SATA adam 2 digital pressure gauge, SATA adam 2 mini digital pressure gauge, or SATA adam 2 U digital pressure gauge shall be attached to the spray gun and be in good working condition and reading no greater than 29 psig when the spray gun is in operation.

4. This approval is only valid if during actual operation, the SATAjet X 5500 RP spray gun (non-digital) is equipped with a properly operating SATA air micrometer with gauge 0/845 (product number 27771), SATA adam 2 digital pressure gauge, SATA adam 2 mini digital pressure gauge, or SATA adam 2 U digital pressure gauge.
5. SATA GmbH & Co. KG shall add a clearly visible permanent label specifying that the inlet air pressure shall not exceed 29 psig to all SATAjet X 5500 RP spray gun (non-digital and digital) sold or distributed for use within the South Coast Air Quality Management District.
6. This approval is only valid if during actual operation, the SATAjet X 5500 RP spray gun (non-digital and digital) is labeled as described in condition number 5.
7. This approval is only valid for the SATAjet X 5500 RP spray gun (non-digital and digital) model tested. Any modification of the spray gun or pressure gauge design shall invalidate this approval letter unless the modification is approved by the SCAQMD in writing prior to the modification.

If you have any questions regarding this approval, please call me at (909) 396-3129 or send me an email at mhaimov@aqmd.gov.

Sincerely,



Mitch Haimov, M. S.
Senior Engineering Manager
Coating, Printing, Plating,
Military & Entertainment Operations

MH:VHN:KLN