



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Air Quality

December 3, 2012

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

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Eingang 12. Dez. 2012								GL
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Dear Dr. Schmon:

The Pennsylvania Department of Environmental Protection (Department) has completed its review of the information submitted with your request for a determination by the Department that the SATAjet 100 B F RP spray gun model achieves emission reductions equivalent to high volume low pressure (HVLP) or electrostatic spray application methods. Your request was made under 25 Pa. Code Section 129.75(e)(10) (relating to application equipment for mobile equipment repair and refinishing). The Department considered the information included in your original email transmission of August 21, 2012.

Based upon the information you provided, the Department has determined that the SATAjet 100 B F RP spray gun model is capable of achieving emission reductions equivalent to HVLP or electrostatic spray application methods under 25 Pa. Code Section 129.75(e)(10). This determination authorizes the use of the SATAjet 100 B F RP spray gun model for the application of automotive primer-surfacer coatings listed in Table III of 25 Pa. Code Section 129.75(c), in the Commonwealth of Pennsylvania, subject to the following conditions:

1. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet 100 B F RP spray gun model for use in the Commonwealth of Pennsylvania. The notice shall specify that the Department has determined that the SATAjet 100 B F RP spray gun model is equivalent to HVLP or electrostatic spray application methods only for the application of automotive primer-surfacer coatings listed in Table III of 25 Pa. Code Section 129.75.
2. This authorization is valid only if the air pressure supplied to the SATAjet 100 B F RP spray gun model is equal to or less than 32 psig. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet 100 B F RP spray gun model for use in the Commonwealth of Pennsylvania. The notice shall specify that the operation of the SATAjet 100 B F RP spray gun model at an inlet air pressure greater than 32 psig for application of automotive primer-surfacer coatings listed in Table III of 25 Pa. Code Section 129.75(c) constitutes a violation of 25 Pa. Code Section 129.75(e)(10).

3. SATA Farbspritztechnik GmbH & Co. KG shall supply a SATA compressed air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146) modified to clearly identify the maximum allowable spray gun inlet air pressure (32 psig) to each person purchasing a SATAjet 100 B F RP spray gun model for use in the Commonwealth of Pennsylvania. The required modification shall provide a visual confirmation that the maximum allowed air pressure is 32 psig such as color-coding the gauge to make the area of the gauge at and below 32 psig green and the area of the gauge above 32 psig red or other design approved by the Commonwealth of Pennsylvania. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet 100 B F RP spray gun model for use in the Commonwealth of Pennsylvania. The notice shall specify that failure to have the SATA compressed air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146), modified as described above, attached to the spray gun and in good working condition whenever the spray gun is in operation constitutes a violation of 25 *Pa. Code* Section 129.75(e)(10).
4. This authorization does not extend to the use of a SATAjet 100 B F RP spray gun that is not equipped with a properly operating SATA compressed air micrometer with gauge 0/8455 (product number 27771) or SATA adam digital air micrometer with gauge (product number 130146), as described in condition number 3.
5. 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 100 B F RP spray gun models sold or distributed for use within the Commonwealth of Pennsylvania. SATA Farbspritztechnik GmbH & Co. KG shall supply written notification to each person purchasing the SATAjet 100 B F RP spray gun model for use in the Commonwealth of Pennsylvania. The notice shall specify that failure to have the permanent label attached to the spray gun whenever the spray gun is in operation constitutes a violation of 25 *Pa. Code* Section 129.75(e)(10).
6. This authorization does not extend to the use of a SATAjet 100 B F RP spray gun that is not labeled as described in condition number 5.
7. This authorization is valid only for the SATAjet 100 B F RP spray gun model described in the information submitted to the Department on August 21, 2012.
8. In the event SATA Farbspritztechnik GmbH & Co. KG fails to comply with the conditions set forth in this letter, this authorization shall terminate and SATA Farbspritztechnik GmbH & Co. KG shall immediately discontinue the sale and distribution of the SATAjet 100 B F RP spray gun model for use in the Commonwealth of Pennsylvania for the application of automotive primer-surfacer coatings listed in Table III of 25 *Pa. Code* Section 129.75(c).

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in Braille or on audiotape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions regarding this approval, please contact Mr. Scott Kepner at 717-772-2330.

Sincerely,

Handwritten signature of Joyce E. Epps in cursive script, with the initials "DEVO" written at the end.

Joyce E. Epps

Director

Bureau of Air Quality