

1/10/2024

Sara Robbe  
ANEST IWATA Americas, Inc.  
10148 Commerce Park Drive  
Cincinnati, OH 45246

Re: Rule 339.D.7.e. – HVLP Equivalent Transfer Efficiency Approval of Series 2 WS-400 Spray Guns

Dear Sara Robbe,

The Santa Barbara County Air Pollution Control District (District) has reviewed ANEST IWATA's formal request for written approval to sell, and users to operate the WS-400 Series 2 Spray Gun in Santa Barbara County. The results of the transfer efficiency testing submitted to the Santa Barbara County Air Pollution Control District indicate that the following spray guns can achieve equivalent or better transfer efficiency than high-volume low-pressure spray equipment:

- WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-2, WS-400-02 OBS, WS-400-03, and WS-400-03-BF (Basecoat and Clearcoat) at  $\leq 29$  psig.

Based on these results, the WS-400 Series 2 Spray Gun is approved for operations subject to Rule 339, Motor Vehicle and Mobile Equipment Coating Operations, under District Rule 339.D.7.e. This approval is subject to the following conditions:

1. ANEST IWATA shall supply written notification with each WS-400 Series 2 Spray Gun sold or distributed for use within Santa Barbara County that the spray gun with air caps WS-400-2, WS-400-02 OBS, WS-400-03, and WS-400-03-BF is only approved for the application of basecoats and clearcoats subject to Rule 339.
2. This approval is only valid if the air pressure supplied to the WS-400 Series 2 Spray Gun is less than or equal to 29 psig. ANEST IWATA shall supply written notification with each WS-400 Series 2 Spray Gun sold or distributed for use within Santa Barbara County that the maximum air pressure supplied to the spray gun shall not exceed 29 psig.
3. ANEST IWATA shall supply a digital pressure gauge (Part No. DPG-1) with each digital WS-400 Series 2 Spray Gun sold or distributed for use within Santa Barbara County. ANEST IWATA shall supply a mechanical pressure gauge (Item #8131B) that clearly identifies the maximum allowable spray gun inlet air pressure with each non-digital WS-400 Series 2 Spray Gun sold or distributed for use within Santa Barbara County. ANEST IWATA shall supply written notification with each WS-400 Series 2 Spray Gun sold or distributed for use within Santa Barbara County specifying that the pressure gauge shall be attached to the spray gun, be in good working condition, and reading no greater than 29 psig whenever the spray gun is in operation.

4. This approval is only valid if during actual operation, the WS-400 Series 2 Spray Gun is equipped with a properly operating pressure gauge that meets the criteria specified in Condition No. 3.
5. ANEST IWATA shall add a clearly visible permanent label on the spray gun body which identifies it as "WS-400 Series 2" for all WS-400 Series 2 Spray Gun sold or distributed for use within Santa Barbara County.
6. ANEST IWATA shall add a clearly visible permanent label on the spray gun air cap which identifies it as "WS-400-2", "WS-400-02 OBS", "WS-400-03", and "WS-400-03-BF" and indicates that the inlet air pressure shall not exceed 29 psig for all WS-400 Series 2 Spray Guns sold or distributed for use within Santa Barbara County.
7. This approval is only valid if during actual operation, the WS-400 Series 2 Spray Gun with Air Caps WS-400-2, WS-400-02 OBS, WS-400-03, and WS-400-03-BF is labeled as described in Condition Nos. 5 and 6.
8. This approval is only valid for the WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-2, WS-400-02 OBS, WS-400-03, and WS-400-03-BF tested. Any modification of the spray gun, air caps, or pressure gauge design shall invalidate this approval letter unless the modification is approved by the Santa Barbara County Air Pollution Control District in writing prior to the modification.

If you have any questions regarding this approval, please contact Noah Dooley of my staff by email at [DooleyN@sbcapcd.org](mailto:DooleyN@sbcapcd.org) or by phone at (805) 979-8316.

Sincerely,



William Sarraf, Division Supervisor  
Engineering Division

cc: HVLP Equivalency – District List of Approved Non-HVLP Spray Guns  
Glenn Gazdecki  
William Sarraf