

May 20, 2026

Sara Robbe
ANEST IWATA Americas, Inc.
9525 Glades Drive
West Chester, OH 45011

Re: Transfer Efficiency Approval for ANEST IWATA WS-400-AX-1 Non-Digital and WS-400-AXD-1 Digital Spray Guns
Project: #C-1234640

Dear Ms. Robbe:

The San Joaquin Valley Air Pollution Control District (District) has received your request for approval to sell and operate the ANEST IWATA WS-400-AX-1 non-digital spray gun and WS-400-AXD-1 digital spray gun (both with air cap WX-400-01-AX-1) within the District's jurisdiction as coating application methods meeting the minimum transfer efficiency requirements of District Rule 4612 (Motor Vehicle and Mobile Equipment Coating Operations). Spray equipment demonstrating at least 65 percent transfer efficiency - equivalent to high-volume low-pressure (HVLP) spray equipment - demonstrated using South Coast Air Quality Management District (SCAQMD) test method "Spray Equipment Transfer Efficiency Test Procedure for Equipment User," is approvable under Rule 4612.

The District has reviewed the March 20, 2024 and April 13, 2023 letters you have submitted from U.S. EPA and South Coast Air Quality Management District (SCAQMD), respectively, regarding their approval of the ANEST IWATA WS-400-AX-1 non-digital and WS-400-AXD-1 digital spray guns with air cap WX-400-01-AX-1 as having demonstrated a coating transfer efficiency equivalent to high-volume low-pressure (HVLP) spray guns for the application of automotive coatings subject to 40 CFR Part 63 Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) or SCAQMD Rule 1151 (Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations). Based on review of these letters, the District has determined that the ANEST IWATA WS-400-AX-1 non-digital spray gun and the WS-400-AXD-1 digital spray gun are approved for use under District Rule 4612. This approval is subject to the following conditions, consistent with the SCAQMD approval:

1. ANEST IWATA Strategic Center ("ANEST IWATA") shall supply written notification with each WS-400-AXD-1 digital spray gun and each WS-400-AX-1 non-digital

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Executive Director/Air Pollution Control Officer

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spray gun (both with the air cap WS-400-01-AX-1) sold or distributed for use within the jurisdiction of the District is only approved for the application of clearcoats subject to District Rule 4612.

2. This approval is only valid if the air pressure supplied to either the WS-400-AXD-1 digital spray gun or WS-400-AX-1 non-digital spray gun is less than or equal to 36 psig. ANEST IWATA shall supply written notification with each WS-400-AXD-1 digital spray gun and each WS-400-AX-1 non-digital spray gun sold or distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun shall not exceed 36 psig.
3. ANEST IWATA shall supply a digital pressure gauge (Part No. DPG-1) with each WS-400-AXD-1 digital spray gun sold or distributed for use within the jurisdiction of the District. ANEST IWATA shall supply a mechanical pressure gauge (Item #8131B) that clearly identifies the maximum allowable spray gun inlet air pressure with each WS-400-AX-1 non-digital spray gun sold or distributed within the jurisdiction of the District. ANEST IWATA shall supply written notification with each WS-400-AXD-1 digital spray gun and each WS-400-AX-1 non-digital spray gun sold or distributed for use within the jurisdiction of the District specifying that the pressure gauge shall be attached to the spray gun, be in good working condition, and reading no greater than 36 psig whenever the spray gun is in operation.
4. This approval is only valid if during actual operation the WS-400-AXD-1 digital spray gun and the WS-400-AX-1 non-digital spray gun are 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 that identifies it as "WS-400-AXD-1" and indicates that the inlet air pressure shall not exceed 36 psig for all WS-400-AXD-1 digital spray guns sold or distributed for use within the District. ANEST IWATA shall add a clearly visible permanent label on the spray gun body that identifies it as "WS-400-AX-1" and indicates that the inlet air pressure shall not exceed 36 psig for all WS-400-AX-1 non-digital spray guns sold or distributed for use within the District.
6. ANEST IWATA shall add a clearly visible permanent label on the spray gun air cap that identifies it as "WS-400-01-AX-1" for all WS-400-AXD-1 digital spray guns and all WS-400-AX-1 non-digital spray guns sold or distributed for use within the District.
7. This approval is only valid if during actual operation, the WS-400-AXD-1 digital spray gun with air cap WS-400-01-AX-1 (Clearcoat) and WS-400-AX-1 non-digital spray gun with air cap WS-400-01-AX-1 (Clearcoat) are labeled as described in Condition Nos. 5 and 6.

8. This approval is only valid for the WS-400-AXD-1 digital spray gun with air cap WS-400-01-AX-1 (Clearcoat) and the WS-400-AX-1 non-digital spray gun with air cap WS-400-01-AX-1 (Clearcoat) tested. Any modification of the spray guns, air caps, or pressure gauge design shall invalidate this approval letter unless the modification is approved by the District in writing prior to the modification.

Please notify the District of any changes associated with this equipment. Thank you for your cooperation in this matter. Should you have any questions regarding this approval, please contact Mr. Errol Villegas of Permit Services at (559) 230-5900 or by e-mail at errol.villegas@valleyair.org.

Sincerely,

Brian Clements
Director of Permit Services



Errol Villegas
Permit Services Manager

BC:tb

cc: Vishal Patel, Compliance Manager