



July 2, 2024

Sara Robbe
Marketing Manager
ANEST IWATA Americas
10148 Commerce Park Drive
Cincinnati, OH 45246

Subject: **Rule 459 Transfer Efficiency Equivalent Approval of the WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF (Basecoat and Clearcoat)**

Dear Sara Robbe:

The Sacramento Metropolitan Air Quality Management District has completed review of your January 18, 2024 petition requesting approval of **ANEST IWATA WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** as having a transfer efficiency equivalent to or better than high volume low pressure (HVLP) spray equipment. The review included evaluating the report titled "Anest Iwata Transfer Efficiency – Final Report" dated August 30, 2022 and the South Coast Air Quality Management District's approval letter of the **ANEST IWATA WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF (Basecoat and Clearcoat)** dated April 13, 2023.

The SMAQMD's review of the information you submitted indicates the transfer efficiency of the **ANEST IWATA WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** was determined by the test methods specified in SMAQMD Rule 459, *Automotive, Mobile Equipment, And Associated Parts And Components Coating Operations*, and the transfer efficiency of the **ANEST IWATA WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** were verified to be equivalent to, or higher than, HVLP spray equipment. Based on this review, the District hereby grants conditional approval of the **ANEST IWATA WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** for use in the District. This approval is subject to the following conditions.

1. Anest Iwata must supply written notification with each **WS-400 Series 2 Spray Gun (Digital and Non-Digital)** sold or distributed for use within the jurisdiction of the District that the spray gun with **Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** is only approved for the application of basecoats and clearcoats; all coatings are subject to Rule 459.

2. This approval is only valid if the air pressure supplied to the **WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** is equal to or less than 29 psig. Anest Iwata must supply written notification with **WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** sold or distributed for use within the jurisdiction of the District that the maximum air pressure supplied to the spray gun must not exceed 29 psig.
3. Anest Iwata must supply a digital pressure gauge (Part No. DPG-1) with each **WS-400 Series 2 Spray Gun (Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** sold or distributed for use within the jurisdiction of the District. Anest Iwata must supply a mechanical pressure gauge (Item#8131B) with each **WS-400 Series 2 Spray Gun (Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** sold or distributed for use within the jurisdiction of the District.

Anest Iwata must supply written notification with each **WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** sold or distributed for use within the jurisdiction of the District specifying that the pressure gauge must be attached to the spray gun and 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 (Digital and Non-Digital)** is equipped with a properly operating pressure gauge that meets the criteria specified in Condition No. 3.
5. Anest Iwata must add a clearly visible permanent label on the spray gun air cap which identifies it as "**WS-400-02,**" "**WS-400-02-OBS,**" "**WS-400-03,**" or "**WS-400-03-BF**" for all **WS-400 Series 2 Spray Gun (Digital and Non-Digital)** sold or distributed for use within the District.
6. Anest Iwata must add a clearly visible permanent label on the spray gun body which identifies it as "**WS-400 Series 2**" and indicates that the inlet air pressure must not exceed 29 psig for all **WS-400 Series 2 Spray Gun (Digital and Non-Digital)** sold or distributed for use within the District.
7. This approval is only valid if during actual operation, the **WS-400 Series 2 Spray Gun (Digital and Non-Digital) with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** (Basecoat and Clearcoat) is labeled as described in Condition numbers 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-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF** (Basecoat and Clearcoat) model tested. Any modification of the spray guns, air caps, or pressure gauge design will invalidate this approval letter unless the modification is approved by the District.

If you have any questions concerning this matter, please contact Jeff Quok of my staff at (279) 207-1145.

Sincerely,

Amy L. Roberts

Amy Roberts
Division Manager

cc: Alberto Ayala, Executive Director/Air Pollution Control Officer, SMAQMD
Angela Thompson, Program Manager, SMAQMD
Brian Krebs, Program Manager, SMAQMD