



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Research Triangle Park, NC 27711

OFFICE OF
AIR QUALITY PLANNING AND
STANDARDS

March 20, 2024

Mr. Eric Paugh
Anest Iwata Americas, Inc.
10148 Commerce Park Drive
Cincinnati, Ohio 45246
Email: ericpaugh@anestiwata.com

Re: Approval of Anest Iwata Model WS-400-AX-1 Spray Gun (Nondigital)

Dear Mr. Paugh:

This letter responds to your request for approval of the Anest Iwata model WS-400-AX-1 Spray Gun as having transfer efficiency equivalent to that achieved by high-volume, low pressure (HVLP) spray guns and thus suitable for use as described herein. As detailed below, we have determined that the spray gun may be used when spray-applying automotive refinish coatings to comply with Clean Air Act regulations at subpart HHHHHH of 40 Code of Federal Regulations (CFR) part 63. We approve use of this spray gun, with conditions outlined below, for operations subject to the regulations cited below. We have completed our review of your report entitled:

“Evaluation of the ANEST IWATA WS-400-AX-1 Non-digital and Digital Paint Spray Guns for Use in the South Coast Air Quality Management District (SCAQMD),” August 30, 2022. Project No.: 11-06255. Prepared by Michael Hilt, Deputy Head, Fraunhofer Institute for Manufacturing Engineering and Automation IPA.

The results of the transfer efficiency testing performed indicate that the Anest Iwata model WS-400-AX-1 spray gun (nondigital) is capable of achieving transfer efficiency equivalent to or better than HVLP spray equipment. As a result, the Anest Iwata model WS-400-AX-1 spray gun (nondigital) is approved for operations subject to §63.11173(e)(3) of 40 CFR part 63, subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations. This approval is subject to the following conditions.

1. Anest Iwata Americas, Inc. (“Anest Iwata”) shall supply written notification with each model WS-400-AX-1 spray gun sold or distributed that the spray gun is approved as providing transfer efficiency equivalent to HVLP spray guns for the application of coatings subject to 40 CFR part 63, subpart HHHHHH.
2. Anest Iwata shall supply written notification with each model WS-400-AX-1 spray gun sold or distributed that the spray gun with air cap WS-400-AX-1 is only approved for the application of clearcoats subject to 40 CFR part 63, subpart HHHHHH.

3. This approval is only valid if the air pressure supplied to the model WS-400-AX-1 spray gun is equal to or less than 36 pounds per square inch gauge (psig). Anest Iwata shall supply written notification with each model WS-400-AX-1 spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 36 psig for the application of coatings subject to 40 CFR part 63, subpart HHHHHH.
4. Anest Iwata shall supply a mechanical pressure gauge (Item #8131B) that clearly identifies the maximum allowable spray gun inlet air pressure with each nondigital model WS-400-AX-1 spray gun sold or distributed. Anest Iwata shall supply written notification with each model WS-400-AX-1 spray gun sold or distributed that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation for the application of coatings subject to 40 CFR part 63, subpart HHHHHH.
5. Anest Iwata shall provide written notification to buyers/users of the model WS-400-AX-1 spray gun that it must be equipped with a properly operating pressure gauge (Item #8131B for the nondigital model WS-400-AX-1 spray gun), as described in Condition No. 4 above, and that it must be operated at less than or equal to 36 psig when it is used for applying coatings subject to 40 CFR part 63, subpart HHHHHH.
6. Anest Iwata shall add a clearly visible permanent label on the spray gun body that identifies it as "WS-400-AX-1" for all model 400-AX-1 spray guns sold or distributed.
7. Anest Iwata shall add a clearly visible permanent label on the spray gun air cap that identifies it as "WS-400-AX-1" and that indicates that the inlet air pressure shall not exceed 36 psig for all model WS-400-AX-1 spray guns sold or distributed.
8. This approval is only valid if, during actual operation, the model WS-400-AX-1 spray gun with air cap WS-400-AX-1 is labeled as described in Condition Nos. 6 and 7 above.
9. This approval is only valid for the model WS-400-AX-1 spray gun (nondigital) with air cap WS-400-AX-1. Any modification of the spray gun, air caps, or pressure gauge design shall invalidate this approval letter unless the modification is approved by the United States Environmental Protection Agency in writing prior to the modification.

The written notification requirements outlined in this letter may be fulfilled by including a copy of this approval letter with the documentation provided to the purchaser of the spray gun. If you have any questions regarding this approval, please contact Kaye Whitfield at (919) 541-2509 or whitfield.kaye@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Noora Edmond". The signature is written in a cursive style and is positioned above a horizontal line.

for
Peter Tsirigotis
Director