



**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-SR2 (or WS-400 Series 2) Spray Gun (Digital and Nondigital)

Dear Mr. Paugh:

This letter responds to your request for approval of the Anest Iwata model WS-400-SR2 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 reports entitled:

“ANEST IWATA Transfer Efficiency – Final Report.” UDRI Report Number: UDR-TR-2022-97.  
Prepared by: Christopher A. Joseph, Senior Research Engineer, University of Dayton Research Institute, for Anest Iwata USA, Inc., 10 August 2022.

“Anest Iwata WS400-SR2 EPA TE Test Results of Anest Iwata’s In-house Testing Performed October 24, 2023, Reportedly Using the DIN 13966-1 Standard.”

The results of the transfer efficiency testing performed indicate that the Anest Iwata model WS-400-SR2 spray gun (digital and nondigital) is capable of achieving transfer efficiency equivalent to or better than HVLP spray equipment. As a result, the Anest Iwata model WS-400-SR2 spray gun (digital and 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-SR2 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-SR2 spray gun sold or distributed that the spray gun with air cap WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF is only approved for the application of basecoats (“color coating”) and 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-SR2 spray gun is equal to or less than 29 pounds per square inch gauge (psig). Anest Iwata shall supply written notification with each model WS-400-SR2 spray gun sold or distributed that the maximum air pressure supplied to the spray gun shall not exceed 29 psig for the application of coatings subject to 40 CFR part 63, subpart HHHHHH.
4. Anest Iwata shall supply a digital pressure gauge (Part No. DPG-1) with each digital model WS-400-SR2 spray gun sold or distributed. 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-SR2 spray gun sold or distributed. Anest Iwata shall supply written notification with each model WS-400-SR2 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-SR2 spray gun that it must be equipped with a properly operating pressure gauge (Part No. DPG-1 for the digital model WS-400-SR2 spray gun or Item #8131B for the nondigital model WS-400-SR2 spray gun), as described in Condition No. 4 above, and that it must be operated at less than or equal to 29 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-SR2” for all model WS-400-SR2 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-400-02,” “WS-400-02-OBS,” “WS-400-03,” or “WS-400-03-BF” and that indicates that the inlet air pressure shall not exceed 29 psig for all model WS-400-SR2 spray guns sold or distributed.
8. This approval is only valid if, during actual operation, the model WS-400-SR2 spray gun with air cap WS-400-02, WS-400-02-OBS, WS-400-03, or WS-400-03-BF is labeled as described in Condition Nos. 6 and 7 above.
9. This approval is only valid for the model WS-400-SR2 spray gun (digital and nondigital) with air cap WS-400-02, WS-400-02-OBS, WS-400-03, or WS-400-03-BF. 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 contained within a rectangular box.

for  
Peter Tsirigotis  
Director