

# STATE OF COLORADO

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Bill Owens, Governor  
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

August 29, 2005

Mr. Scott Rex  
Rex Marketing & Sales, Inc.  
9788 South Adelaide Circle  
Highlands Ranch, Colorado 80130

Re: SATA – Request for RACT Equivalency Determination for SATAjet RP Spray Guns

Dear Mr. Rex:

The Air Pollution Control Division (the Division) has reviewed your request received via e-mail on August 4, 2005 regarding the determination of Reasonably Available Control Technology (RACT) equivalency for SATAjet RP (non-digital) and SATAjet RP Digital 2 paint spray guns. This request is being made on behalf of SATA Farbspritztechnik GmbH & Co. KG (SATA) and follows up on a similar request made by Ms. Susanne Walters of SATA on August 31, 2004. At that time, Ms. Walters had provided results from transfer efficiency tests and a copy of an approval letter from the South Coast Air Quality Management District (California). SATA also maintains a list of this and other regulatory agency approval letters on its company web site.

Colorado Air Quality Control Commission (AQCC) Regulation Nos. 3 and 7 establish RACT requirements for sources in the Denver 1-Hour Ozone Attainment/Maintenance Area. The Denver 1-Hour Ozone Area is composed of Denver, Jefferson, Douglas, Broomfield and Boulder (excluding Rocky Mountain National Park) Counties plus the portions of Arapahoe and Adams Counties west of Kiowa Creek.

The Division has previously determined that High Volume Low Pressure (HVLP) paint spray guns constitute RACT for surface coating operations that involve the application of base coats and clear coats in general, and for any top coat applied to a large area. A large area is defined as any area greater than nine (9) square feet. Subject surface coating owner/operators within the Denver 1-Hour Ozone Area must obtain written permission from the Division prior to using any method other than HVLP application for applying base coats, clear coats or large area top coats.

The results of the transfer efficiency testing performed indicate that the SATAjet RP spray guns are capable (under specified operating parameters) of achieving equivalent or better transfer efficiency

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than HVLP spray equipment. Based on this review, the Division approves their use under the following conditions:

1. The air pressure supplied to the SATAjet RP spray guns is equal to or less than 35 pounds per square inch gauge (psig).
2. A SATA air micrometer with gauge, provided by SATA is attached to the SATAjet RP (non-digital) spray gun and is in good working condition during actual operation. The gauge must clearly indicate that the maximum air pressure to be used is 35 psig and the spray gun must be operated as such. (The SATAjet RP Digital 2 already contains a built-in air micrometer with gauge.)
3. A clearly visible permanent label specifying that the inlet air pressure shall not exceed 35 psig is attached to all SATAjet RP Digital 2 spray guns used; and they must be operated as such.
4. SATA shall supply written notification to each individual purchasing a SATAjet RP spray gun for use within the Denver 1-Hour Ozone Area indicating that its use is only approved when operated under the conditions specified in this letter.
5. The operator can produce a copy of this letter for inspection by the Division or local agency personnel upon their request.
6. Only the SATAjet RP (non-digital) and SATAjet Digital 2 spray gun models are covered by this approval.

Please note that the Division is making this determination based on a reliance on the validity and accuracy of the information that SATA provided in its transmittals. Please do not hesitate to contact me at 303-692-3252 or [Roland.Hea@state.co.us](mailto:Roland.Hea@state.co.us) if you have any questions regarding this letter or would like to further discuss this issue. Thank you.

Sincerely,



Roland C. Hea, P.E.

Permitting Section Supervisor  
Stationary Sources Program  
Air Pollution Control Division  
APCD-SS-B1

cc: Mr. Christian Bunk – SATA (All cc: via e-mail)  
Mr. Paul Carr – APCD  
Mr. R K Hancock III – APCD  
Mr. Robert Jorgenson – APCD  
Ms. Kirsten King – APCD  
Ms. Shannon McMillan – APCD  
Dr. Ewald Schmon – SATA  
Mr. Steve Treutel – SATA USA  
Ms. Susanne Walter – SATA