



# South Coast Air Quality Management District

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April 13, 2023

Mr. Eric Paugh  
Project Engineering Supervisor  
Anest Iwata USA, Inc.  
10148 Commerce Park Drive  
Cincinnati, OH 45246

Dear Mr. Paugh:

**Subject:** Rule 1151 Transfer Efficiency 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), Application No. 627297.

The South Coast Air Quality Management District (South Coast AQMD) has completed review of your report entitled “Anest Iwata Transfer Efficiency – Final Report” dated August 10, 2022. The results of the transfer efficiency testing performed indicate that 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 capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure (HVLP) spray equipment. 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 approved for operations subject to Rule 1151, Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, under South Coast AQMD Rule 1151(d)(6)(A)(v). This approval is subject to the following conditions:

1. Anest Iwata USA, Inc. (“Anest Iwata”) shall supply written notification with each WS-400 Series 2 Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD 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 (“Color Coating”) and clearcoats subject to South Coast AQMD Rule 1151.
2. This approval is only valid if the air pressure supplied to the WS-400 Series 2 Spray Gun is less than or equal to 29 psig. Anest Iwata shall supply written notification with each WS-400 Series 2 Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD that the maximum air pressure supplied to the spray gun shall not exceed 29 psig.
3. Anest Iwata shall supply a digital pressure gauge (Part No. DPG-1) with each digital WS-400 Series 2 Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD. Anest Iwata shall supply a mechanical pressure gauge

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(Item #8131B) that clearly identifies the maximum allowable spray gun inlet air pressure with each non-digital WS-400 Series 2 Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD. Anest Iwata shall supply written notification with each WS-400 Series 2 Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD specifying that the pressure gauge shall be attached to the spray gun, 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 is 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 Series 2" for all WS-400 Series 2 Spray Guns sold or distributed for use within the South Coast AQMD.
6. 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 indicates that the inlet air pressure shall not exceed 29 psig for all WS-400 Series 2 Spray Guns sold or distributed for use within the South Coast AQMD.
7. This approval is only valid if during actual operation, the WS-400 Series 2 Spray Gun with Air Caps WS-400-02, WS-400-02-OBS, WS-400-03, and WS-400-03-BF is labeled as described in Condition Nos. 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 tested. Any modification of the spray gun, air caps, or pressure gauge design shall invalidate this approval letter unless the modification is approved by the South Coast AQMD in writing prior to the modification.

If you have any questions regarding this approval, please call me at (909) 396-3129 or send me an email at [mhaimov@aqmd.gov](mailto:mhaimov@aqmd.gov).

Sincerely,



Mitch Haimov, M.S.  
Senior Engineering Manager  
Coating, Printing, Plating,  
Military & Entertainment Operations

MH:SNK:GM