



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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*Thomas W. Easterly*  
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September 4, 2012

Dr. Ewald Schmon, R & D Manager  
SATA GmbH & Co. KG  
DomertalstrasseBe 20  
70806 Kornwestheim Germany

Dear Dr. Schmon:

Re: Approval Request for SATA Spray Guns

The Indiana Department of Environmental Management has reviewed your request for approval of the SATAjet 100 B P, SATAjet 100 B F RP, and SATAjet 1000 B RP spray guns for the application of coatings in Indiana. These guns would be allowed for use at any source in Indiana provided an applicable rule did not prohibit using air atomization spray guns (also known as conventional spray guns).

The following rules have requirements that may prohibit or limit the use of your spray guns. Applicability of these rules is dependent on several factors including date of construction, location, and emission levels. Additionally, other state or federal rules could limit the use of air atomization spray guns.

Rule 326 IAC 8-2, Section 12: This rule applies to wood furniture or cabinet coating operations. Subsection (b) states, "wood furniture or cabinet coating operations subject to this section shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system."

Without a rule change, the use of your SATAjet 100 B P, SATAjet 100 B F RP, and SATAjet 1000 B RP spray guns would be limited as described above.

Rule 326 IAC 8-1, Section 6 (BACT): This rule requires, "New facilities (as of January 1, 1980), which have potential emissions of 22.7 megagrams (25 tons) or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of this article (326 IAC 8), shall reduce VOC emissions using best available control technology (BACT).