South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

January 31, 2024

Monica Bastien
Regulatory Affairs Chemist
3M™ Automotive Aftermarket Division
3M™ Center, 0251-02-A-09
St. Paul, MN 55144

Subject: Rule 1151 Transfer Efficiency Approval of the 3M™ Performance Spray Gun, Model "P", with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer), Non-Digital Pressure Gauge, Application No. 639906.

Dear Ms. Bastien:

The South Coast Air Quality Management District (South Coast AQMD) has completed review of your report entitled "Evaluation of the 3M™ PSG Fine Finish Paint Spray Gun for Use in the South Coast Air Quality Management District (SCAQMD)" dated June 14, 2023. The results of the transfer efficiency testing performed indicate that the 3M™ Performance Spray Gun (Model "P") for various nozzle sizes as summarized in the table below equipped with the Fine Finish (Part No. 78-8137-4756-1) air cap (Basecoat, Clearcoat, Primer) is capable of achieving equivalent or better transfer efficiency than high-volume, low-pressure (HVLP) spray equipment.

Nozzle Inner Diameter Size (mm)	3M™ Part No.
0.9	26909
1.1	26911
1.2	26912
1.3	26913
1.4	26914
1.6	26916
1.8	26918
2.0	26920

The 3M™ Performance Spray Gun (Model "P") with the Fine Finish (Part No. 78-8137-4756-1) Air Cap (Basecoat, Clearcoat, Primer) 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. 3M™ Automotive Aftermarket Division ("3M™") shall supply written notification with each Model "P" Performance Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD that the spray gun with the Fine Finish air cap (Part No. 78-8137-4756-1) is only approved for the application of basecoats, clearcoats, and primers subject to South Coast AQMD Rule 1151.

2. This approval is only valid if the air pressure supplied to the Model "P" Performance Spray Gun is less than or equal to 29 psig. 3M™ shall supply written notification with each Model "P" Performance 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. 3M™ shall supply a non-digital/analog pressure gauge (Part No. 26573) with each Model "P" Performance Spray Gun sold or distributed for use within the jurisdiction of the South Coast AQMD. 3M™ shall supply written notification with each Model "P" Performance 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 Model "P" Performance Spray Gun is equipped with a properly operating pressure gauge that meets the criteria specified in Condition No. 3.

5. 3M™ shall add a clearly visible permanent label on the spray gun body which identifies it as model "P" for all Model "P" Performance Spray Guns sold or distributed for use within the South Coast AQMD.

6. 3M™ shall add a clearly visible permanent label on the spray gun air cap (Part No. 78-8137-4756-1) that identifies it as "Fine Finish" and indicates that the inlet air pressure shall not exceed 29 psig for all Model "P" Performance Spray Guns sold or distributed for use within the South Coast AQMD.

7. This approval is only valid if during actual operation, the Model "P" Performance Spray Gun with the Fine Finish air cap (Part No. 78-8137-4756-1) is labeled as described in Condition Nos. 5 and 6.

This approval is only valid for 3M™ Model "P" Performance Spray Gun tested with Fine Finish Air Cap (Part No. 78-8137-4756-1) and evaluated under Application No. 639906. Any modification of the spray gun configuration, including but not limited to changes to parts listed in the original bill of materials (BOM) submitted with the application, air cap design, or pressure gauge design shall invalidate this approval letter. If you have any questions regarding this approval, please call me at (909) 396-3129 or send me an email at mhaimov@aqmd.gov.

Sincerely,

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

MH:EKT:EM

OFFICE OF AIR QUALITY PLANNING AND STANDARDS
RESEARCH TRIANGLE PARK, NC 27711

July 19, 2024

Ms. Monica A. S. Bastien
Regulatory Affairs Chemist
3M Automotive Aftermarket Division
3M Center, 0251-02-A-09
St. Paul, Minnesota 55144-1000

Via Email: mbastien@mmm.com

Re: Approval of 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap

Dear Ms. Bastien:

This letter responds to your request for approval of the sale, operation, and distribution of 3M™ non-HVLP spray gun/equipment, specifically the 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer). 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.

Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63.1173(e)) requires that each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirement that all spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the EPA.

The EPA completed review of the following supporting documentation submitted by 3M Automotive Aftermarket Division:

- Fraunhofer IPA Final Report titled, "Evaluation of the 3M PSG Fine Finish paint spray gun for use in the South Coast Air Quality Management District (SCAQMD)," June 14, 2023;

- South Coast Air Quality Management District memo titled, "Rule 115 l Transfer Efficiency

Approval of the 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer), Non-Digital Pressure Gauge, Application No. 639906," January 31, 2024;

- 3M™ Performance Spray Gun System Owner's Manual, 3M Performance Spray Guns (26878, 26778, 26832); and

- 3M Brochure titled, "3M™ Performance Spray Gun Details and Specifications."

The results of the transfer efficiency testing performed indicate that the 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) is capable of achieving equivalent or better transfer efficiency than HVLP spray equipment. As a result, the 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) is approved for operations subject to §63.11173(e)(3) of 40 CFR Part 63 Subpart HHHHHH, subject to the following conditions:

1. 3M Automotive Aftermarket Division shall supply written notification with each 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) sold or distributed that the spray gun is approved as providing equivalent transfer efficiency as HVLP spray guns for each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation subject to 40 CFR Part 63 Subpart HHHHHH.

2. This approval is only valid if the air pressure supplied to the 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) is equal to or less than 29 pounds per square inch gauge (psig). 3M Automotive Aftermarket Division shall supply written notification with each 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) 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.

3. 3M Automotive Aftermarket Division shall supply a non-digital/analog pressure gauge with each 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) sold or distributed.

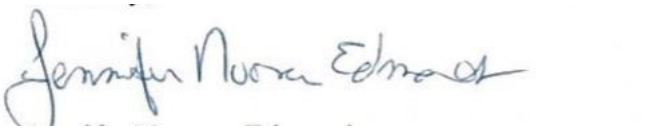
4. 3M shall supply written notification with each 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) sold or distributed specifying that the pressure gauge shall be attached to the spray gun, be in good working condition, and reading no greater than 29 psig whenever the spray gun is in operation.

5. 3M Automotive Aftermarket Division shall add a clearly visible permanent label on the spray gun body which identifies it as model 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) sold or distributed.

6. 3M shall add a clearly visible permanent label on the spray gun air cap (Part No. 78-8137-4756-1) that identifies it as "Fine Finish" and indicates that the inlet air pressure shall not exceed 29 psig for all 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) spray guns sold or distributed.

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 3M™ Performance Spray Gun, Model "P," with "Fine Finish" Air Cap (Basecoat, Clearcoat, Primer) spray gun. If you have any questions regarding this approval, please contact Kaye Whitfield at (919) 541-2509 or whitfield.kaye@epa.gov.

Sincerely,



for
Peter Tsirigotis
Director
Office of Air Quality Planning and Standards