



OFFICE OF AIR QUALITY PLANNING AND STANDARDS

RESEARCH TRIANGLE PARK, NC 27711

October 24, 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 an upgraded version of the 3M™ Performance Spray Gun, Model “P,” with “Fine Finish” Air Cap

Dear Ms. Bastien:

This letter responds to your request for approval of the upgraded version (Model 2) of the 3M™ Performance Spray Gun, Model “P” with “Fine Finish” Air Cap for sale, operation, and distribution as 3M™ non-high volume low pressure (HVLP) spray gun equipment. As detailed below, we have determined that the Model “P” and Model 2 version (with only aesthetic upgrades) of this spray gun may be used when spray-applying automotive refinish coatings in compliance with Clean Air Act regulations at subpart HHHHHH of 40 Code of Federal Regulations (CFR) part 63, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The Model “P” and Model 2 spray guns are approved with the conditions outlined below for operations subject to the regulations cited below. (Note: This letter supersedes the original approval letter dated July 19, 2024.)

Section 63.1173(e) of subpart HHHHHH 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 an 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.

3M has provided the EPA with adequate documentation to demonstrate that the equivalent technology requirement has been met. The EPA has determined that both the 3M™ Performance Spray Gun, Model “P” and Model 2, with “Fine Finish” Air Cap has equivalent transfer efficiency to HVLP spray guns, for use when spray applying automotive refinish coatings under 40 CFR Part 63. Therefore,

the EPA has approved the 3M™ Performance Spray Gun, Model “P” and Model 2, with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer) subject to the regulation cited.

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 memorandum titled, “Rule 1151 Transfer Efficiency Approval of the 3M™ Performance Spray Gun, Model “P” and Model 2, with “Fine Finish” Air Cap (Basecoat, Clearcoat Primer), Non-Digital Pressure Gauge, Application Nos. 639906, 648124,” July 23, 2024;
- South Coast Air Quality Management District memorandum titled, “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,” 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” and Model 2, with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer) are capable of achieving equivalent or better transfer efficiency than HVLP spray equipment. As a result, the 3M™ Performance Spray Gun, Model “P” and Model 2, with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer) are 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 the 3M™ Performance Spray Gun, Model “P” and Model 2, with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer) sold or distributed that the spray guns are 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” and Model 2, with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer) are 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” and Model 2, 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” and Model 2, 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” and Model 2 with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer) sold or distributed specifying that the pressure gauge shall be attached to the spray guns, be in good working condition, and reading no greater than 29 psig whenever the spray guns are 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” and Model 2, 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” and Model 2, 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” and Model 2, 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,

Penny Lassiter
Director
Sector Policies and Programs Division