



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 I 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;

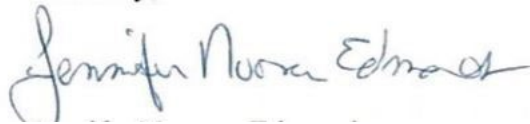
- 3M™ Performance Spray Gun System Owner's Manual, 3M Performance Spray Guns (26878, 26778, 26832); and
- 3M Brochure titled, "3M™ Performance Spray Gun Details and Specifications."

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,

A handwritten signature in blue ink, reading "Jennifer Noor Edmond". The signature is written in a cursive style with a large initial "J".

for
Peter Tsirigotis
Director
Office of Air Quality Planning and Standards