



# South Coast Air Quality Management District

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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.

*Cleaning the air that we breathe...*

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](mailto:mhaimov@aqmd.gov).

Sincerely,



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

MH:EKT:EM