



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

July 23, 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” and Model “2,” with “Fine Finish” Air Cap (Basecoat, Clearcoat, Primer), Non-Digital Pressure Gauge, Application Nos. 639906, 648124.

Dear Ms. Bastien:

This approval letter supersedes the 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 letter dated January 31, 2024.

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 Guns (Model “P” and Model “2”) 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) are 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” and Model “2”) with the Fine Finish (Part No. 78-8137-4756-1) Air Cap (Basecoat, Clearcoat, Primer) are 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” and Model “2” 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” and Model “2” Performance Spray Gun is less than or equal to 29 psig. 3M™ shall supply written notification with each Model “P” and Model “2” 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” and Model “2” 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” and Model “2” 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” and Model “2” 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 that identifies it as either Model “P” for all Model “P” Performance Spray Guns or Model “2” for all Model “2” 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” and Model “2” 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” and Model “2” 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” and Model “2” Performance Spray Guns tested with Fine Finish Air Cap (Part No. 78-8137-4756-1) and evaluated under Application Nos. 639906 and 648124. 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 applications, 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:EM