

New York State Department of Environmental Conservation

Division of Air Resources

Bureau of Stationary Sources, 2nd Floor

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J. Henkes



Denise M. Sheehan
Commissioner

June 15, 2006

Ms. Karen M. Brooks
Product Responsibility Specialist
3M Company
Building 251-2A-09
St. Paul, MN 55144-1000

**6 NYCRR Part 228
Approval of the 3M/Graco Compliant Spray Gun**

Dear Ms. Brooks:

The New York State Department of Environmental Conservation (Department) has completed its review of the report "Graco/3M Compliant Spray Gun Verification Test Report" dated December 22, 2004 and received by this office July 6, 2005. The results of the transfer efficiency testing performed indicate that the 3MTMPPSTM Compliant Spray Guns are capable of (under specified operating parameters) achieving equivalent or better transfer efficiency than high-volume, low-pressure spray equipment (HVLP). Based on this review, the Department approves its use in New York State as provided for under 6 NYCRR 228.3(f)(2)(vii): with the following condition:

Graco and 3M shall supply written notification to each individual purchasing the 3MTHPPSTH compliant spray gun for use within New York State, that the gun is only approved when:

- a) used in the application of coatings subject to 6 NYCRR Part 228.
- b) the air pressure supplied to the spray gun does not exceed 29 psig.
- c) the spray gun is supplied with, and properly operated with, a 3M combination pressure gage and inlet valve (part number 16229) that clearly identifies the maximum inlet pressure allowable in New York State.
- d) the spray gun model that was tested is used. Any modification of the spray gun design invalidates this approval.

If you have any questions regarding this approval, do not hesitate to contact me at (518) 402-8403 or jlhenkes@gw.dec.state.ny.us

Sincerely,



John L Henkes, PE
Environmental Engineer II
Bureau of Stationary Sources
Division of Air Resources

cc: Regional Air Pollution Control Engineers