

MAR 22 2017

BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. ENVIRONMENTAL APPEALS BOARD

In the Matter of:

Bell Trucks America, Inc.  
Bell Equipment Limited

Respondents.

Docket No.  
CAA-AED-2017-8351

**CONSENT AGREEMENT**

**Preliminary Statement**

1. This is a civil administrative penalty assessment proceeding instituted under section 205(c)(1) of the Clean Air Act (“CAA”), 42 U.S.C. § 7524(c)(1). The issuance of this Consent Agreement and attached Final Order simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).
2. Complainant in this matter is the United States Environmental Protection Agency (“EPA”). On the EPA’s behalf, Phillip A. Brooks, Director, Air Enforcement Division, Office of Civil Enforcement, Office of Enforcement and Compliance Assurance, is authorized by lawful delegation to institute and settle civil administrative penalty assessment proceedings under section 205(c)(1) of the CAA, 42 U.S.C. § 7524(c)(1).
3. Respondents in this matter are Bell Equipment Limited (“BEL”) and Bell Trucks America, Inc. (“BTA”) (collectively, “Respondents”). Respondent BEL is a corporation organized under the laws of Luxembourg with an office at 13 – 19 Carbonode Cell Road, Alton, Richards Bay, South Africa, 3900. BEL is a manufacturer and distributor of heavy equipment, including articulating dump trucks (“ADTs”). Respondent BTA is a

corporation organized under the laws of Texas with an office at 8111 Mills Road, Houston, TX 77064. BTA is an importer and the sole distributor of BEL ADTs in the United States.

4. The EPA and Respondents, having agreed to settle this action, consent to the entry of this Consent Agreement and the attached Final Order before taking testimony and without adjudication of any issues of law or fact herein, and agree to comply with the terms of this Consent Agreement and the attached Final Order.

### **Jurisdiction**

5. This Consent Agreement is entered into under section 205(c)(1) of the CAA, 42 U.S.C. § 7524(c)(1), and the “Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits,” 40 C.F.R. Part 22 (“Consolidated Rules”).
6. The EPA may administratively assess a civil penalty if the penalty sought is less than \$362,141, CAA §§ 205(c)(1), 42 U.S.C. §§ 7524(c)(1); 40 C.F.R. §§ 19.4, 1068.125(b).
7. The Administrator and the Attorney General jointly determined that this matter, although it involves a penalty amount greater than \$362,141, is appropriate for administrative penalty assessment. CAA §§ 205(c)(1), 42 U.S.C. § 7524(c)(1); 40 C.F.R. §§ 19.4, 1068.125(b).
8. The Environmental Appeals Board is authorized to issue consent orders memorializing settlements between the EPA and Respondents resulting from administrative enforcement actions under the CAA and to issue final orders assessing penalties under the CAA. 40 C.F.R. § 22.4(a)(1); EPA Delegation 7-41-C.

9. The Consolidated Rules provide that where Respondents agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order. 40 C.F.R. §§ 22.13(b), 22.18(b).

### **Governing Law**

10. This proceeding arises under Part A of Title II of the CAA, CAA §§ 202–219, 42 U.S.C. §§ 7521–7554, and the regulations promulgated thereunder. These laws aim to reduce emissions from mobile sources of air pollution, including particulate matter, non-methane hydrocarbons, oxides of nitrogen, and carbon monoxide. The Alleged Violations of Law, stated below, regard nonroad compression-ignition (“CI”) engines. What follows is a summary of the law that governs these allegations.
11. General definitions:
- (a) “Person” includes individuals, corporations, partnerships, associations, states, municipalities, and political subdivisions of a state. CAA § 302(e), 42 U.S.C. § 7602(e).
  - (b) “Manufacturer” means any person engaged in the manufacturing or assembling of new motor vehicles, new motor vehicle engines, new nonroad vehicles or new nonroad engines, or importing such vehicles or engines for resale, or who acts for and is under the control of any such person in connection with the distribution of new motor vehicles, new motor vehicle engines, new nonroad vehicles or new nonroad engines, but shall not include any dealer with respect to new motor vehicles, new motor vehicle engines, new nonroad vehicles or new nonroad engines received by him in commerce. CAA § 216(1), 42 U.S.C. § 7550(1).

12. 40 C.F.R. § 1039.801 provides the following definitions:

(a) “Nonroad engine” includes any internal combustion engine:

- (1) In or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes, and bulldozers);  
or
- (2) In or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers); or
- (3) That, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

(b) “Compression-ignition” means relating to a type of reciprocating, internal-combustion engine that is not a spark-ignition engine.

(c) “Certification” means obtaining a certificate of conformity (“COC”) for an engine family complying with the nonroad CI engine emission standards and requirements.

13. EPA’s Regulations for Control of Emissions from New and In-use Nonroad CI Engines, 40 C.F.R. Part 1039, set exhaust emissions standards for new nonroad diesel engines and establish testing, certification, and labeling requirements starting with model year 2011 for engines between 130 and 560 kW.

14. The General Provisions for Nonroad Programs at 40 C.F.R. § 1068.101(a)(5) prohibit any person from importing into the United States any new nonroad engine unless such engine is covered by an EPA-issued COC and bears a permanently affixed EPA Emission Control Information (“ECI”) label or is properly exempted or excluded from the certification requirements.
15. The EPA ECI label, among other things, must be attached in such a manner that it cannot be removed without destroying or defacing the label and must contain specified information including the manufacturer’s name, trademark, engine family, fuel type, and the date of manufacture (i.e., day (optional), month and year). 40 C.F.R. § 1039.135(b).
16. The fuel inlet on the equipment containing the engine is also required to be labeled “Ultra low sulfur fuel only”. 40 C.F.R. § 1039.135(e).
17. The General Provisions at 40 C.F.R. Part 1068 require that engines installed in new nonroad equipment be certified to standards in effect as of the manufacture date of the equipment, with limited exceptions for using up normal inventory of engines built before a change in emission standards. 40 C.F.R. §§ 1068.101(a)(1)(i) and 1068.105(a). In addition, the provisions at 40 C.F.R. Part 1039 specify that an imported nonroad engine that is not covered by a COC is considered new at the time of importation. 40 C.F.R. § 1039.801 (*new nonroad engine*).
18. The Transition Program for Equipment Manufacturers (TPEM) provisions of 40 C.F.R. § 1039.625(j) allow an engine manufacturer to produce exempted engines that do not meet current tier emission control requirements if the engine manufacturer first receives written assurance from the equipment manufacturer (who will purchase and install the exempt engine) that the equipment manufacturer is entitled to use those exempted

engines under the equipment flexibility program of 40 C.F.R. § 1039.625. Under this provision, the engine manufacturer must apply an ECI label according to 40 C.F.R. § 1039.135, including affixing a permanent label to each engine at the time of manufacture, but must replace the standard compliance statement with one specified in 40 C.F.R. § 1039.625(j)(1).

19. TPEM program regulations require an equipment manufacturer to label equipment produced with an exempted engine with emission control information in a specified format. 40 C.F.R. § 1039.625(f).
20. Equipment manufacturers intending to use TPEM-exempt engines are required to submit reports to EPA for each year that they use the provision, as described under 40 C.F.R. § 1039.625(g). The notification reports must be submitted before using the TPEM provisions each year, and annual reports of units sold are due on March 31 of the following year.
21. Importers into the United States of equipment containing engines subject to EPA emission standards are required to complete the appropriate EPA declaration form before importing any engines or equipment. 40 C.F.R. § 1068.301(d).
22. An equipment manufacturer who fails to follow the TPEM program regulations will violate the prohibition of 40 C.F.R. § 1068.101(a)(1) by selling, offering for sale, introducing or delivering into commerce, or importing engines or equipment that are not exempt from the CAA's certification requirement or that do not have the required engine label or tag. An equipment manufacturer may not sell, offer for sale, introduce into commerce, deliver for introduction into commerce, import (or cause any of the foregoing with respect to) any equipment containing an engine subject to emission standards that is

not covered by a valid EPA-issued certificate of conformity (or exempt from certification requirements) and has the required label or tag. CAA § 203(a)(1) and (a)(4), 42 U.S.C. § 7522(a)(1) and (a)(4); 40 C.F.R. § 1068.101(a)(1) and (b)(5). EPA may assess a civil penalty of up to \$45,268 for each individual piece of equipment in violation.

### **Stipulated Facts**

23. The Subject Equipment and Engines identified in Appendix A to this Consent Agreement are nonroad CI engines, as defined above, and are subject to the emission standards and compliance provisions of the CAA and its regulations. CAA §§ 203, 213(d), 42 U.S.C. §§ 7522, 7547(d).
24. Respondents are each “persons.”
25. Respondents are each “manufacturers.”
26. BTA imported all of the Subject Equipment and Engines into the United States.
27. BEL produced all of the Subject Equipment.
28. Daimler AG produced all of the Subject Engines.
29. BEL maintains that it provided written assurance to the engine manufacturer that BEL is entitled to use exempted engines under the equipment flexibility program of 40 C.F.R. § 1039.625.
30. In many instances, the engine manufacturer did not apply an ECI label specified in 40 C.F.R. § 1039.625(j)(1).
31. BEL submitted written annual notification to EPA of its intent to use TPPEM-exempt engines as described under 40 C.F.R. § 1039.625(g). BEL further provided annual notification to EPA of units of TPPEM-exempt engines sold.

32. Respondents sold, introduced into United States commerce, delivered for introduction into United States commerce, imported (or caused the foregoing with respect to) every one of the Subject Equipment and Engines identified in Appendix A.
33. In April and May of 2016, authorized inspectors from the EPA and the United States Department of Homeland Security's Bureau of Customs and Border Protection ("CBP") inspected 20 model B50D Bell articulated dump trucks from entries NW6-00330288, NW6-00330502, NW6-00332862, NW6-00332888, NW6-00332300, NW6-00334058, and Bills of Lading ACLU6249S6670328 and ACLU6249S6672312 at the Ports of Baltimore, Maryland, and Norfolk, Virginia.
34. The inspected equipment was identified as having been manufactured in 2016, however EPA found ECI labels affixed to the inspected engines indicating that they were manufactured by Daimler AG as part of model year 2013 EPA engine family DMBXL15.9RJB. A COC covering engine family DMBXL15.9RJB was issued by EPA to Mercedes Benz (of Daimler AG), covering engines built no later than December 31, 2013, that meet Tier 4 interim and alternate NOx emission standards under 40 CFR § 1039.102.
35. Tier 4 interim exhaust emission standards for non-road CI engines in the power category between 130 and 560 kW (like the inspected engines) became effective starting in model year 2011. 40 C.F.R. § 1039.102.
36. Tier 4 final exhaust emission standards for non-road CI engines in the power category between 130 and 560 kW (like the inspected engines) became effective starting in model year 2014. 40 C.F.R. § 1039.102.



37. Although these engines are built to a configuration that was certified in prior model years, these engines are not covered by a COC. The emissions from the inspected engines meet the emission standards that would allow them to be exempted from the Act's certification requirement under the TPEM program; however, the inspected engines and the equipment in which the engines are installed do not meet the requirements of the TPEM exemption because they bear no label affixed on the engine at the time of manufacture identifying the engines as exempt pursuant to the requirements of 40 C.F.R. § 1039.625(j). In addition to the engines, the equipment itself bears no label in accordance with 40 C.F.R. § 1039.625(f) nor 40 C.F.R. § 1039.135(e).
38. In a letter dated August 26, 2016, the EPA issued Respondents a Request for Information under section 208(a) of the CAA, 42 U.S.C. § 7542(a) (“§ 208 Request”). This § 208 Request required Respondents and their affiliates to provide, among other things, documentation of engine importations, documentation of TPEM claims for each engine, and information about Respondents’ business structure and the identity of any business affiliates.
39. Subsequent to EPA's inspections in April and May 2016, BEL voluntarily disclosed to EPA that the fuel inlet on other imported equipment was also not labeled “Ultra low sulfur fuel only” as required under 40 C.F.R. § 1039.135(e).
40. EPA reviewed Bell Truck America’s responses to the EPA’s § 208 Request and found that BTA imported into the United States an additional 107 trucks between May of 2014 through April of 2016, with engines that do not meet Tier 4 final exhaust emission standards and are not covered by a COC and bear no labels as required by 40 C.F.R. §§ 1039.625(j) and 1039.625(f).

41. BTA imported approximately 464 nonroad vehicles without the fuel inlet labels required under 40 C.F.R. §§ 1039.135(e). These additional engines were labeled as belonging to engine families CMBXL15.9RJB, DMBXL15.9RJB, DMBXL07.2RJB, EMBXL07.7RJA, FMBXL07.7RJA, FMBXL15.6RJA, and GMBXL07.7RJA.
42. Equipment manufacturers utilizing the TPEM provision must notify the EPA of their intent to use the provisions and make an annual report to verify allowances have not been exceeded per 40 C.F.R. § 1039.625(g). BEL submitted its annual TPEM report for 2015, which was due on March 31, 2016, on June 3, 2016. That report was then revised on July 26, 2016.

#### **Alleged Violations of Law**

43. Certification Violations: The EPA alleges that Respondents sold, offered for sale, introduced into commerce, delivered for introduction into commerce, imported (or caused the foregoing with respect to) the 127 units identified in Appendix A in violation of section 203(a)(1) of the CAA, 42 U.S.C. § 7522(a)(1). The EPA alleges that these units are neither covered by a COC nor exempt (under TPEM or otherwise) from the CAA's certification requirements.
44. Labeling Violations: The EPA alleges that Respondents sold or leased (or caused the foregoing acts with respect to) 464 units identified in Appendix A without the fuel inlet labels required by 40 C.F.R. § 1039.135(e), in violation of section 203(a)(4)(a) of the CAA, 42 U.S.C. § 7522(a)(4)(a), and 40 C.F.R. § 1068.101(a)(1).
45. Reporting Violations: The EPA alleges that BEL failed to timely submit its annual TPEM report for calendar year 2015 by the March 31, 2016 deadline required under 40 C.F.R.

§ 1039.625(g), in violation of section 203(a)(2) of the CAA, 42 U.S.C. § 7522(a)(2), and 40 C.F.R. § 1068.101(a)(2).

### **Terms of Agreement**

46. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondents admit that the EPA has jurisdiction over this matter as stated above; admit to the stipulated facts stated above; neither admit nor deny the Alleged Violations of Law stated above; consent to the assessment of a civil penalty as stated below; consent to the issuance of any specified compliance or corrective action order; consent to any conditions specified in this Consent Agreement, and to any stated Permit Action; waive any right to contest the Alleged Violations of Law; and waive their rights to appeal the Final Order accompanying this Consent Agreement.
47. For the purpose of this proceeding, Respondents:
- (a) Agree that this Agreement states a claim upon which relief may be granted against Respondents;
  - (b) Waive any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondents may have with respect to any issue of fact or law set forth in this Consent Agreement, including any right of judicial review under Section 307(b)(1) of the CAA, 42 U.S.C. § 7607(b)(1);
  - (c) Waive any rights they may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to enforce this Agreement or Order, or both, and to seek an additional penalty for such noncompliance, and agree that federal law shall govern in any such civil action;

- (d) Consent to personal jurisdiction in any action to enforce this Agreement or Order, or both, in the United States District Court for the District of Columbia;
- (e) Agree that Respondents may not delegate duties under this Consent Agreement to any other party without the written consent of the EPA, which may be granted or withheld at EPA's unfettered discretion. If the EPA so consents, the Consent Agreement is binding on the party or parties to whom the duties are delegated;
- (f) Acknowledge that this Agreement constitutes an enforcement action for purposes of considering Respondents' compliance history in any subsequent enforcement actions;
- (g) Acknowledge that this Consent Agreement and attached Final Order will be available to the public and agree that it does not contain any confidential business information or personally identifiable information;
- (h) Acknowledge that its tax identification numbers may be used for collecting or reporting any delinquent monetary obligation arising from this Agreement (see 31 U.S.C. § 7701);
- (i) Certify that the information they have supplied concerning this matter was, at the time of submission, true, accurate, and complete; and
- (j) Acknowledge that there are significant penalties for knowingly submitting false, fictitious, or fraudulent information, including the possibility of fines and imprisonment (see 18 U.S.C. § 1001).

48. For purposes of this proceeding, the parties each agree that:

- (a) This Consent Agreement constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof;
  - (b) This Consent Agreement may be signed in any number of counterparts, each of which will be deemed an original and, when taken together, constitute one agreement; the counterparts are binding on each of the parties individually as fully and completely as if the parties had signed one single instrument, so that the rights and liabilities of the parties will be unaffected by the failure of any of the undersigned to execute any or all of the counterparts; any signature page and any copy of a signed signature page may be detached from any counterpart and attached to any other counterpart of this Consent Agreement.
  - (c) Its undersigned representative is fully authorized by the party whom he or she represents to bind that party to this Consent Agreement and to execute it on behalf of that party;
  - (d) Each party's obligations under this Consent Agreement and attached Final Order constitute sufficient consideration for the other party's obligations under this Consent Agreement and attached Final Order; and
  - (e) Each party will bear its own costs and attorney fees in the action resolved by this Consent Agreement and attached Final Order.
49. Respondents agree to pay to the United States a civil penalty of \$478,000 (the Civil Penalty).

50. Respondents agree to pay the Civil Penalty to the United States within 30 calendar days following the issuance of the attached Final Order (i.e., the Effective Date of this Consent Agreement and attached Final Order).
51. Respondents agree to pay the Civil Penalty in the manner specified below:
- (a) Pay the Civil Penalty using any method provided on the following website:  
<http://www2.epa.gov/financial/additional-instructions-making-payments-epa>;
  - (b) Identify each and every payment with “Docket No. CAA-AED-2017-8351”; and
  - (c) Within 24 hours of payment, email proof of payment to Evan Belser at [belser.evan@epa.gov](mailto:belser.evan@epa.gov) (“proof of payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with “Docket No. CAA-AED-2017-8351”).
52. As a condition of settlement, Respondents agree to the following:
- (a) Within 60 days of the Effective Date of this Agreement, apply to the units identified below a supplemental label in a readily visible location adjacent to the existing emission control information label that is required by 40 C.F.R. § 1039.135 that will be durable throughout the engine’s useful life and cannot be removed without being destroyed or defaced. Each label shall state: “This articulated dump truck is not EPA certified, but is legal for introduction into United States commerce pursuant to the terms of a settlement agreement with the US EPA, Docket No. CAA-AED-2017-8351.”

	<b>Equipment ID #</b>	<b>Engine Serial Number</b>
<b>1</b>	B93A350DK07505407	942.993-C-0914570
<b>2</b>	B93A350DK07505410	942.993-C-0893862
<b>3</b>	B93A350DJ07505408	942.993-C-0909669
<b>4</b>	B93A350DT07505405	942.993-C-0916861
<b>5</b>	B93A350DC07505404	942.993-C-0909660
<b>6</b>	B93A350DT07505419	942.993-C-0909690
<b>7</b>	B93A350DC07505418	942.993-C-0909606
<b>8</b>	B93A350DC07505435	942.993-C-0909681
<b>9</b>	B93A350DE07505420	942.993-C-0909636
<b>10</b>	B93A350DT07505422	942.993-C-0913531
<b>11</b>	B93A350DV07505413	942.993-C-0909618
<b>12</b>	B93A350DA07505414	942.993-C-0914453
<b>13</b>	B93A350DC07505412	942.993-C-0914312
<b>14</b>	B93A350DV07505430	942.993-C-0909696
<b>15</b>	B93A350DH07505433	942.993-C-0909708
<b>16</b>	B93A350DC07505421	942.993-C-0914356
<b>17</b>	B93A350DH07505416	942.993-C-0914016
<b>18</b>	B93A350DL07505415	942.993-C-0909588
<b>19</b>	B93A350DE07505417	942.993-C-0913643
<b>20</b>	B93A350DC07505426	942.993-C-0914337

(b) Within 120 days of the Effective Date of this Agreement, Respondents must provide a corrective action report to EPA that includes the following and otherwise demonstrates the labeling described in the foregoing subparagraph was completed:

- (1) A legible photograph of a representative label as applied;
- (2) A list of vehicle identification numbers and corresponding engine serial numbers that received supplemental labels; and
- (3) Certification of the completion of the required supplemental labeling of each unit as described above, signed by a corporate officer, containing the following language:

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that this document and its attachments were prepared either by me personally or under my direction or supervision in a manner designed to ensure that qualified and knowledgeable personnel properly gather and present the information contained therein. I further certify, based on my personal knowledge or on my inquiry of those individuals immediately responsible for obtaining the information, that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowingly and willfully submitting a materially false statement.

- (c) By their signatures to this Consent Agreement, Respondents each certify individually that from the date of their signatures, they will not sell, offer to sell, introduce into United States commerce, deliver for introduction into United States commerce, or import (or cause the foregoing with respect to) any new equipment containing TPEM engines between 130 and 560 kW other than those specifically listed in Paragraph 52(a) into the United States.
- (d) Respondents shall be liable for stipulated penalties of \$10,000 per unit if Respondents sell, offer to sell, introduce into United States commerce, deliver for introduction into United States commerce, import (or cause the foregoing with respect to) any of the 20 units identified in Paragraph 52(a) if those unit(s) are not labeled as required by Paragraph 52(a). Respondents must pay any such stipulated penalties not more than 30 days after receipt of written demand by the EPA for such penalties and in the manner described in Paragraph 51. Whether Respondents owe stipulated penalties shall be in the sole discretion of the EPA.



### **Effect of Consent Agreement and Attached Final Order**

53. In accordance with 40 C.F.R. § 22.18(c), Respondents' full compliance with this Consent Agreement shall only resolve Respondents' liability for federal civil penalties for the violations and facts alleged above.
54. Failure to pay the full amount of the penalty assessed under this Consent Agreement may subject Respondents to a civil action to collect any unpaid portion of the proposed Civil Penalty and interest. In order to avoid the assessment of interest, administrative costs, and late payment penalty in connection with such civil penalty, as described in the following Paragraph of this Consent Agreement, Respondents must timely pay the penalty.
55. If Respondents fail to timely pay any portion of the penalty assessed by the attached Final Order, the EPA may:
  - (a) Request the Attorney General to bring a civil action in an appropriate district court to recover: the amount assessed; interest at rates established pursuant to 26 U.S.C. § 6621(a)(2); the United States' enforcement expenses; and a 10 percent quarterly nonpayment penalty, 42 U.S.C. § 7524(c)(6);
  - (b) Refer the debt to a credit reporting agency or a collection agency, 40 C.F.R. §§ 13.13, 13.14, and 13.33;
  - (c) Collect the debt by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds (see 40 C.F.R. Part 13, Subparts C and H); and

- (d) Suspend or revoke Respondents' licenses or other privileges, or suspend or disqualify Respondents from doing business with the EPA or engaging in programs the EPA sponsors or funds, 40 C.F.R. § 13.17.
56. Penalties paid pursuant to this Consent Agreement are not deductible for federal tax purposes. 28 U.S.C. § 162(f).
57. This Consent Agreement and attached Final Order apply to and are binding upon the Complainant and the Respondent. Successors and assigns of Respondents are also bound if they are owned, in whole or in part, directly or indirectly, or otherwise controlled by Respondents. Nothing in the previous sentence adversely affects any right of the EPA under applicable law to assert successor or assignee liability against Respondents' successors or assignees.
58. Nothing in this Consent Agreement shall relieve Respondents of the duty to comply with all applicable provisions of the CAA or other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.
59. The EPA reserves the right to revoke this Consent Agreement and accompanying settlement penalty if, and to the extent the EPA finds, after signing this Consent Agreement, that any information provided by Respondents was or is materially false or inaccurate, and the EPA reserves the right to pursue, assess, and enforce legal and equitable remedies for the Alleged Violations of Law. The EPA shall give Respondents written notice of such termination, which will be effective upon mailing.

60. The Parties agree to submit this Consent Agreement to the Environmental Appeals Board with a request that it be incorporated into a Final Order.
61. Respondents and Complainant agree to issuance of the attached Final Order. Upon filing, the EPA will transmit a copy of the filed Consent Agreement to the Respondents. This Consent Agreement and attached Final Order shall become effective after execution of the Final Order by the Environmental Appeals Board and filing with the Hearing Clerk.

## Appendix A: Subject Vehicles and Engines

Equipment VIN	Engine Serial Number	Violation Type
AEBA340DE07405312	941.992-C-0909316	Not certified and not TPEM exempt
AEBA340DT07405295	941.992-C-0909484	Not certified and not TPEM exempt
B93A340DK07405205	941.992-C-0910365	Not certified and not TPEM exempt
AEBA340DA07405287	941.992-C-0910369	Not certified and not TPEM exempt
AEBA340DP07405296	941.992-C-0910392	Not certified and not TPEM exempt
AEBA340DH07405289	941.992-C-0910447	Not certified and not TPEM exempt
B93A340DC07405224	941.992-C-0910461	Not certified and not TPEM exempt
B93A340DC07405233	941.992-C-0910470	Not certified and not TPEM exempt
AEBA340DL07405291	941.992-C-0910518	Not certified and not TPEM exempt
AEBA340DC07405294	941.992-C-0910522	Not certified and not TPEM exempt
B93A340DJ07405206	941.992-C-0910530	Not certified and not TPEM exempt
AEBA336DT07405265	941.992-C-0911223	Not certified and not TPEM exempt
AEBA336DC07405269	941.992-C-0911256	Not certified and not TPEM exempt
AEBA336DL07405275	941.992-C-0911264	Not certified and not TPEM exempt
B93A340DH07505409	941.992-C-0911268	Not certified and not TPEM exempt
AEBA336DJ07405271	941.992-C-0911273	Not certified and not TPEM exempt
B93A340DL07505411	941.992-C-0911285	Not certified and not TPEM exempt
AEBA336DC07405272	941.992-C-0911306	Not certified and not TPEM exempt
AEBA336DE07405263	941.992-C-0911408	Not certified and not TPEM exempt
AEBA340DV07405322	941.992-C-0911526	Not certified and not TPEM exempt
AEBA340DK07405297	941.992-C-0912183	Not certified and not TPEM exempt
B93A340DA07405209	941.992-C-0912196	Not certified and not TPEM exempt
AEBA340DE07405293	941.992-C-0912205	Not certified and not TPEM exempt
AEBA340DC07405280	941.992-c-0912219	Not certified and not TPEM exempt
AEBA340DT07405300	941.992-C-0912224	Not certified and not TPEM exempt
AEBA340DE07405276	941.992-C-0912233	Not certified and not TPEM exempt
AEBA336DK07405270	941.992-C-0912237	Not certified and not TPEM exempt
AEBA336DK07405267	941.992-C-0912254	Not certified and not TPEM exempt
AEBA340DV07405286	941.992-C-0912259	Not certified and not TPEM exempt
AEBA340DJ07405298	941.992-C-0912263	Not certified and not TPEM exempt
B93A340DC07405197	941.992-C-0912279	Not certified and not TPEM exempt
B93A340DP07405235	941.992-C-0912287	Not certified and not TPEM exempt
B93A340DK07405236	941.992-C-0912317	Not certified and not TPEM exempt
AEBA340DJ07405303	941.992-C-0912339	Not certified and not TPEM exempt
AEBA340DA07405306	941.992-C-0912343	Not certified and not TPEM exempt
AEBA340DL07405288	941.992-C-0912350	Not certified and not TPEM exempt
AEBA340DA07405290	941.992-C-0912354	Not certified and not TPEM exempt
B93A340DA07405212	941.992-C-0912359	Not certified and not TPEM exempt
AEBA340DT07405281	941.992-C-0912363	Not certified and not TPEM exempt
B93A340DC07405210	941.992-C-0912380	Not certified and not TPEM exempt
AEBA340DH07405292	941.992-C-0912384	Not certified and not TPEM exempt
AEBA340DC07405285	941.992-C-0912863	Not certified and not TPEM exempt
B93A340DV07405211	941.992-C-0912877	Not certified and not TPEM exempt
B93A340DT07405234	941.992-C-0912886	Not certified and not TPEM exempt
B93A340DJ07405318	941.992-C-0912894	Not certified and not TPEM exempt
AEBA340DP07405282	941.992-C-0912901	Not certified and not TPEM exempt

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A340DT07405279	941.992-C-0914487	Not certified and not TPEM exempt
AEBA340DH07405311	941.992-C-0914497	Not certified and not TPEM exempt
AEBA340DH07405308	941.992-C-0914529	Not certified and not TPEM exempt
B93A340DJ07405268	941.992-C-0915106	Not certified and not TPEM exempt
AEBA336DC07405264	941.992-C-0916414	Not certified and not TPEM exempt
AEBA336DH07405259	941.992-C-0916581	Not certified and not TPEM exempt
B93A340DT07405105	941.992-C-0917589	Not certified and not TPEM exempt
B93A340DH07405004	941.992-C-0919660	Not certified and not TPEM exempt
B93A340DC07405006	941.992-C-0919678	Not certified and not TPEM exempt
B93A340DJ07405108	941.992-C-0922660	Not certified and not TPEM exempt
B93A340DK07405091	941.992-C-0923124	Not certified and not TPEM exempt
B93A340DP07405106	941.992-C-0923138	Not certified and not TPEM exempt
B93A340DT07405198	941.992-C-0923148	Not certified and not TPEM exempt
B93A340DK07405107	941.992-C-0923162	Not certified and not TPEM exempt
B93A340DC07405109	941.992-C-0923178	Not certified and not TPEM exempt
B93A340DK07405110	941.992-C-0923189	Not certified and not TPEM exempt
B93A340DJ07405111	941.992-C-0923195	Not certified and not TPEM exempt
B93A340DC07405112	941.992-C-0923230	Not certified and not TPEM exempt
B93A340DV07405144	941.992-C-0923250	Not certified and not TPEM exempt
B93A340DH07405116	941.992-C-0923296	Not certified and not TPEM exempt
B93A340DJ07405139	941.992-C-0923310	Not certified and not TPEM exempt
B93A340DJ07405142	941.992-C-0923320	Not certified and not TPEM exempt
B93A340DC07405191	941.992-C-0923332	Not certified and not TPEM exempt
B93A340DE07405201	941.992-C-0923347	Not certified and not TPEM exempt
B93A340DV07405192	941.992-C-0923362	Not certified and not TPEM exempt
B93A340DL07405194	941.992-C-0923376	Not certified and not TPEM exempt
B93A340DT07405203	941.992-C-0923386	Not certified and not TPEM exempt
B93A340DC07405143	941.992-C-0923400	Not certified and not TPEM exempt
B93A340DP07405199	941.992-C-0923413	Not certified and not TPEM exempt
B93A340DJ07405237	941.992-C-0923421	Not certified and not TPEM exempt
B93A340DP07405204	941.992-C-0929103	Not certified and not TPEM exempt
AEBA336DL07405387	941.992-C-0946916	Not certified and not TPEM exempt
AEBA336DE07405392	941.992-C-0946932	Not certified and not TPEM exempt
AEBA336DK07405379	941.992-C-0976444	Not certified and not TPEM exempt
AEBA336DK07405382	941.992-C-0976482	Not certified and not TPEM exempt
AEBA336DT07405380	941.992-C-0976553	Not certified and not TPEM exempt
AEBA336DC07405376	941.992-C-0976566	Not certified and not TPEM exempt
AEBA336DJ07405383	941.992-C-0976576	Not certified and not TPEM exempt
AEBA336DE07405375	941.992-C-0976630	Not certified and not TPEM exempt
AEBA336DC07405384	941.992-C-0976643	Not certified and not TPEM exempt
AEBA336DE07405389	941.992-C-0976966	Not certified and not TPEM exempt
B93A340DK07505496	941.992-C-0995352	Not certified and not TPEM exempt
B93A350DK07505410	942.993-C-0893862	Not certified and not TPEM exempt
B93A350DH07505402	942.993-C-0909567	Not certified and not TPEM exempt
B93A350DL07505415	942.993-C-0909588	Not certified and not TPEM exempt
B93A350DC07505418	942.993-C-0909606	Not certified and not TPEM exempt
B93A350DV07505413	942.993-C-0909618	Not certified and not TPEM exempt
B93A350DE07505420	942.993-C-0909636	Not certified and not TPEM exempt

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A350DE07405172	942.993-C-0909648	Not certified and not TPEM exempt
B93A350DC07505404	942.993-C-0909660	Not certified and not TPEM exempt
B93A350DJ07505408	942.993-C-0909669	Not certified and not TPEM exempt
B93A350DC07505435	942.993-C-0909681	Not certified and not TPEM exempt
B93A350DT07505419	942.993-C-0909690	Not certified and not TPEM exempt
B93A350DV07505430	942.993-C-0909696	Not certified and not TPEM exempt
B93A350DH07505433	942.993-C-0909708	Not certified and not TPEM exempt
B93A350DT07405093	942.993-C-0911631	Not certified and not TPEM exempt
B93A350DT07505422	942.993-C-0913531	Not certified and not TPEM exempt
B93A350DE07505417	942.993-C-0913643	Not certified and not TPEM exempt
B93A350DH07505416	942.993-C-0914016	Not certified and not TPEM exempt
B93A350DV07405313	942.993-C-0914250	Not certified and not TPEM exempt
B93A350DC07505412	942.993-C-0914312	Not certified and not TPEM exempt
B93A350DC07505426	942.993-C-0914337	Not certified and not TPEM exempt
B93A350DC07505421	942.993-C-0914356	Not certified and not TPEM exempt
B93A350DA07505414	942.993-C-0914453	Not certified and not TPEM exempt
B93A350DK07505407	942.993-C-0914570	Not certified and not TPEM exempt
B93A350DC07405173	942.993-C-0916832	Not certified and not TPEM exempt
B93A350DT07505405	942.993-C-0916861	Not certified and not TPEM exempt
B93A350DH07405171	942.993-C-0916885	Not certified and not TPEM exempt
B93A350DV07405277	942.993-C-0916900	Not certified and not TPEM exempt
B93A350DJ07405261	942.993-C-0916917	Not certified and not TPEM exempt
B93A350DH07405283	942.993-C-0916939	Not certified and not TPEM exempt
B93A350DC07405299	942.993-C-0916966	Not certified and not TPEM exempt
B93A350DE07505403	942.993-C-0917014	Not certified and not TPEM exempt
B93A350DK07405310	942.993-C-0917018	Not certified and not TPEM exempt
B93A350DL07405301	942.993-C-0917025	Not certified and not TPEM exempt
B93A350DH07405168	942.993-C-0924246	Not certified and not TPEM exempt
B93A350DA07405121	942.993-C-0940659	Not certified and not TPEM exempt
B93A350DH07404974	942.993-C-0940695	Not certified and not TPEM exempt
B93A350DH07405123	942.993-C-0941767	Not certified and not TPEM exempt
B93A350DK07405131	942.993-C-0941802	Not certified and not TPEM exempt
B93A350DJ07405132	942.993-C-0957511	Not certified and not TPEM exempt
B93A340DT07304838	941.992-C-0933327	Label: TPEM equipment and fuel inlet label missing
B93A331EL01206750	926.970-C-1070131	Label: TPEM equipment and fuel inlet label missing
B93A331EH01206779	926.970-C-1070125	Label: TPEM equipment and fuel inlet label missing
B93A331ET01206818	926.970-C-1070194	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206817	926.970-C-1070229	Label: TPEM equipment and fuel inlet label missing
B93A331EH01206815	926.970-C-1070242	Label: TPEM equipment and fuel inlet label missing
B93A331EJ01206824	926.970-C-1070263	Label: TPEM equipment and fuel inlet label missing
B93A331EL01206814	926.970-C-1070082	Label: TPEM equipment and fuel inlet label missing
B93A331EA01206813	926.970-C-1070112	Label: TPEM equipment and fuel inlet label missing
B93A331EP01206786	926.970-C-1070211	Label: TPEM equipment and fuel inlet label missing
B93A331EV01206826	926.970-C-1070137	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206864	926.970-C-1071089	Label: TPEM equipment and fuel inlet label missing
B93A331ET01206866	926.970-C-1074121	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206848	926.970-C-1070101	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206816	926.970-C-1070184	Label: TPEM equipment and fuel inlet label missing

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A331ET01206849	926.970-C-1070256	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206850	926.970-C-1071056	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206865	926.970-C-1071079	Label: TPEM equipment and fuel inlet label missing
B93A340DK07304892	941.992-C-0933375	Label: TPEM equipment and fuel inlet label missing
B93A340DT07304890	941.992-C-0933400	Label: TPEM equipment and fuel inlet label missing
B93A340DV07304881	941.992-C-0937731	Label: TPEM equipment and fuel inlet label missing
B93A340DJ07304911	941.992-C-0937850	Label: TPEM equipment and fuel inlet label missing
B93A340DJ07304893	941.992-C-0939652	Label: TPEM equipment and fuel inlet label missing
B93A331EK01206787	926.970-C-1070246	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206811	926.970-C-1070273	Label: TPEM equipment and fuel inlet label missing
B93A331EP01206867	926.970-C-1071068	Label: TPEM equipment and fuel inlet label missing
B93A331EK01206868	926.970-C-1071073	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206873	926.970-C-1071097	Label: TPEM equipment and fuel inlet label missing
B93A331EJ01206869	926.970-C-1071103	Label: TPEM equipment and fuel inlet label missing
B93A331EP01206870	926.970-C-1074119	Label: TPEM equipment and fuel inlet label missing
B93A331EJ01206886	926.970-C-1074125	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206878	926.970-C-1074127	Label: TPEM equipment and fuel inlet label missing
B93A331EJ01206872	926.970-C-1074131	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206887	926.970-C-1070163	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206881	926.970-C-1071066	Label: TPEM equipment and fuel inlet label missing
B93A331EK01206871	926.970-C-1074578	Label: TPEM equipment and fuel inlet label missing
B93A331EH01206894	926.970-C-1074123	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206895	926.970-C-1074129	Label: TPEM equipment and fuel inlet label missing
B93A331EL01206893	926.970-C-1074583	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206896	926.970-C-1074604	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206901	926.970-C-1074613	Label: TPEM equipment and fuel inlet label missing
B93A331ET01206902	926.970-C-1074618	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206900	926.970-C-1074630	Label: TPEM equipment and fuel inlet label missing
B93A331EA01206925	926.970-C-1079285	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206929	926.970-C-1079318	Label: TPEM equipment and fuel inlet label missing
B93A331EA01206939	926.970-C-1079352	Label: TPEM equipment and fuel inlet label missing
B93A340DE07404985	941.992-C-0939660	Label: TPEM equipment and fuel inlet label missing
B93A340DV07404995	941.992-C-0939672	Label: TPEM equipment and fuel inlet label missing
B93A340DC07404972	941.992-C-0943314	Label: TPEM equipment and fuel inlet label missing
B93A340DL07404997	941.992-C-0943336	Label: TPEM equipment and fuel inlet label missing
B93A340DA07404996	941.992-C-0943347	Label: TPEM equipment and fuel inlet label missing
B93A340DT07404973	941.992-C-0943363	Label: TPEM equipment and fuel inlet label missing
B93A331EK01206918	926.970-C-1074592	Label: TPEM equipment and fuel inlet label missing
B93A331EA01206942	926.970-C-1079313	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206946	926.970-C-1079339	Label: TPEM equipment and fuel inlet label missing
B93A331EJ01206936	926.970-C-1079341	Label: TPEM equipment and fuel inlet label missing
B93A331EP01206948	926.970-C-1079354	Label: TPEM equipment and fuel inlet label missing
B93A331EK01206949	926.970-C-1079356	Label: TPEM equipment and fuel inlet label missing
B93A331EL01206957	926.970-C-1079519	Label: TPEM equipment and fuel inlet label missing
B93A331EC01206940	926.970-C-1081424	Label: TPEM equipment and fuel inlet label missing
B93A331ET01206964	926.970-C-1081584	Label: TPEM equipment and fuel inlet label missing
B93A331EV01206941	926.970-C-1081588	Label: TPEM equipment and fuel inlet label missing
B93A331ET01206978	926.970-C-1081443	Label: TPEM equipment and fuel inlet label missing

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A331EC01206977	926.970-C-1081510	Label: TPEM equipment and fuel inlet label missing
B93A331EE01206976	926.970-C-1081593	Label: TPEM equipment and fuel inlet label missing
B93A340DT07405007	941.992-C-0956628	Label: TPEM equipment and fuel inlet label missing
B93A340DP07405221	941.992-C-0972299	Label: TPEM equipment and fuel inlet label missing
B93A340DJ07405223	941.992-C-0972341	Label: TPEM equipment and fuel inlet label missing
B93A340DC07405216	941.992-C-0972357	Label: TPEM equipment and fuel inlet label missing
B93A340DV07405225	941.992-C-0972362	Label: TPEM equipment and fuel inlet label missing
B93A340DT07405217	941.992-C-0972314	Label: TPEM equipment and fuel inlet label missing
B93A340DP07405218	941.992-C-0972329	Label: TPEM equipment and fuel inlet label missing
B93A340DT07405220	941.992-C-0972336	Label: TPEM equipment and fuel inlet label missing
B93A340DE07405215	941.992-C-0972345	Label: TPEM equipment and fuel inlet label missing
B93A340DH07405214	941.992-C-0972349	Label: TPEM equipment and fuel inlet label missing
B93A340DK07405222	941.992-C-0972304	Label: TPEM equipment and fuel inlet label missing
B93A340DV07405242	941.992-C-0974459	Label: TPEM equipment and fuel inlet label missing
B93A340DE07405232	941.992-C-0974470	Label: TPEM equipment and fuel inlet label missing
B93A340DL07405230	941.992-C-0974483	Label: TPEM equipment and fuel inlet label missing
B93A340DE07405229	941.992-C-0974448	Label: TPEM equipment and fuel inlet label missing
B93A340DL07405227	941.992-C-0974379	Label: TPEM equipment and fuel inlet label missing
B93A350DE07505465	942.993-C-0993242	Label: Fuel inlet not labeled as required and TPEM label illegible
AEBA660EV00005328	473.905-C-0155051	Label: Fuel inlet not labeled as required
B93A331EE01206606	926.970-C-1047399	Label: Fuel inlet not labeled as required
B93A331EJ01206659	926.970-C-1050090	Label: Fuel inlet not labeled as required
B93A331EJ01206662	926.970-C-1050131	Label: Fuel inlet not labeled as required
B93A331EC01206615	926.970-C-1050154	Label: Fuel inlet not labeled as required
B93A331EL01206618	926.970-C-1050180	Label: Fuel inlet not labeled as required
B93A331EH01206622	926.970-C-1050194	Label: Fuel inlet not labeled as required
B93A325EV01206605	926.970-C-1052874	Label: Fuel inlet not labeled as required
B93A331EC01206607	926.970-C-1057322	Label: Fuel inlet not labeled as required
B93A331EC01206632	926.970-C-1057968	Label: Fuel inlet not labeled as required
B93A331EV01206633	926.970-C-1057973	Label: Fuel inlet not labeled as required
B93A331EK01206725	926.970-C-1057981	Label: Fuel inlet not labeled as required
B93A331EC01206727	926.970-C-1057986	Label: Fuel inlet not labeled as required
B93A331EK01206661	926.970-C-1057988	Label: Fuel inlet not labeled as required
B93A331ET01206625	926.970-C-1058012	Label: Fuel inlet not labeled as required
B93A331EL01206764	926.970-C-1058054	Label: Fuel inlet not labeled as required
B93A331EJ01206726	926.970-C-1058056	Label: Fuel inlet not labeled as required
B93A331EC01206669	926.970-C-1059161	Label: Fuel inlet not labeled as required
B93A331EV01206745	926.970-C-1059172	Label: Fuel inlet not labeled as required
B93A331EP01206769	926.970-C-1059193	Label: Fuel inlet not labeled as required
B93A331EJ01206760	926.970-C-1059203	Label: Fuel inlet not labeled as required
B93A331EA01206634	926.970-C-1059206	Label: Fuel inlet not labeled as required
B93A331ET01206768	926.970-C-1059213	Label: Fuel inlet not labeled as required
B93A331EP01206724	926.970-C-1059222	Label: Fuel inlet not labeled as required
B93A331EV01206728	926.970-C-1059229	Label: Fuel inlet not labeled as required
B93A331EL01206649	926.970-C-1059240	Label: Fuel inlet not labeled as required
B93A331EJ01206631	926.970-C-1059250	Label: Fuel inlet not labeled as required
B93A331EH01206670	926.970-C-1059259	Label: Fuel inlet not labeled as required
B93A331EC01206638	926.970-C-1059266	Label: Fuel inlet not labeled as required



<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A331EC01206775	926.970-C-1060054	Label: Fuel inlet not labeled as required
B93A331EP01206660	926.970-C-1060102	Label: Fuel inlet not labeled as required
B93A331EL01206666	926.970-C-1060111	Label: Fuel inlet not labeled as required
B93A331EV01206664	926.970-C-1060303	Label: Fuel inlet not labeled as required
B93A331EA01206665	926.970-C-1060311	Label: Fuel inlet not labeled as required
B93A625EV02007202	935.911-C-0029702	Label: Fuel inlet not labeled as required
B93A625EJ02007200	935.911-C-0029713	Label: Fuel inlet not labeled as required
B93A625EC02007201	935.911-C-0029718	Label: Fuel inlet not labeled as required
B93A625EJ02007178	935.911-C-0029724	Label: Fuel inlet not labeled as required
B93A625EA02007198	935.911-C-0029729	Label: Fuel inlet not labeled as required
B93A625EJ02007195	935.911-C-0029736	Label: Fuel inlet not labeled as required
B93A625EK02007194	935.911-C-0029740	Label: Fuel inlet not labeled as required
B93A625ET02007192	935.911-C-0029745	Label: Fuel inlet not labeled as required
B93A625EP02007193	935.911-C-0029752	Label: Fuel inlet not labeled as required
B93A625EL02007199	935.911-C-0029756	Label: Fuel inlet not labeled as required
B93A625EA02007217	935.911-C-0029761	Label: Fuel inlet not labeled as required
B93A625EL02007204	935.911-C-0029854	Label: Fuel inlet not labeled as required
B93A625EC02007263	935.911-C-0032046	Label: Fuel inlet not labeled as required
B93A625EV02007278	935.911-C-0032052	Label: Fuel inlet not labeled as required
B93A625EJ02007259	935.911-C-0032109	Label: Fuel inlet not labeled as required
B93A625EC02007246	935.911-C-0032654	Label: Fuel inlet not labeled as required
B93A625EJ02007276	935.911-C-0033922	Label: Fuel inlet not labeled as required
B93A625EK02007275	935.911-C-0033930	Label: Fuel inlet not labeled as required
B93A625EP02007291	935.911-C-0033980	Label: Fuel inlet not labeled as required
B93A625EP02007288	935.911-C-0033992	Label: Fuel inlet not labeled as required
B93A625EL02007283	935.911-C-0033996	Label: Fuel inlet not labeled as required
B93A625ET02007290	935.911-C-0034000	Label: Fuel inlet not labeled as required
B93A625EK02007289	935.911-C-0034004	Label: Fuel inlet not labeled as required
B93A625EC02007286	935.911-C-0034009	Label: Fuel inlet not labeled as required
B93A625ET02007287	935.911-C-0034013	Label: Fuel inlet not labeled as required
B93A625EJ02007424	935.911-C-0039268	Label: Fuel inlet not labeled as required
B93A625EH02007429	935.911-C-0041640	Label: Fuel inlet not labeled as required
B93A625ET02007399	935.911-C-0044535	Label: Fuel inlet not labeled as required
B93A625ET02007404	935.911-C-0044569	Label: Fuel inlet not labeled as required
B93A625EC02007456	935.911-C-0044590	Label: Fuel inlet not labeled as required
B93A625ET02007435	935.911-C-0044606	Label: Fuel inlet not labeled as required
B93A625EV02007426	935.911-C-0044975	Label: Fuel inlet not labeled as required
B93A625EJ02007391	935.911-C-0044993	Label: Fuel inlet not labeled as required
B93A625EL02007428	935.911-C-0045014	Label: Fuel inlet not labeled as required
B93A625EA02007430	935.911-C-0047013	Label: Fuel inlet not labeled as required
B93A625EE02007478	935.911-C-0047030	Label: Fuel inlet not labeled as required
B93A625EC02007465	935.911-C-0047038	Label: Fuel inlet not labeled as required
B93A625ET02007449	935.911-C-0047044	Label: Fuel inlet not labeled as required
B93A625EC02007490	935.911-C-0047062	Label: Fuel inlet not labeled as required
B93A625EA02007511	935.911-C-0049572	Label: Fuel inlet not labeled as required
B93A625EL02007560	935.911-C-0049608	Label: Fuel inlet not labeled as required
B93A625EP02007565	935.911-C-0050035	Label: Fuel inlet not labeled as required
B93A625EL02007476	935.911-C-0050054	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A625EC02007563	935.911-C-0050072	Label: Fuel inlet not labeled as required
B93A625EE02007562	935.911-C-0050093	Label: Fuel inlet not labeled as required
B93A625EH02007561	935.911-C-0053083	Label: Fuel inlet not labeled as required
B93A625EH02007558	935.911-C-0053107	Label: Fuel inlet not labeled as required
B93A625EA02007556	935.911-C-0053116	Label: Fuel inlet not labeled as required
B93A625EL02007557	935.911-C-0053136	Label: Fuel inlet not labeled as required
B93A625EH02007527	935.911-C-0053143	Label: Fuel inlet not labeled as required
B93A625EE02007559	935.911-C-0053146	Label: Fuel inlet not labeled as required
B93A625EV02007569	935.911-C-0054619	Label: Fuel inlet not labeled as required
B93A625ET02007564	935.911-C-0054623	Label: Fuel inlet not labeled as required
B93A625EV02007572	935.911-C-0054627	Label: Fuel inlet not labeled as required
B93A625EC02007571	935.911-C-0055301	Label: Fuel inlet not labeled as required
B93A625EC02007594	935.911-C-0055308	Label: Fuel inlet not labeled as required
B93A625EA02007573	935.911-C-0055342	Label: Fuel inlet not labeled as required
B93A625EK02007535	935.911-C-0056250	Label: Fuel inlet not labeled as required
B93A625EV02007586	935.911-C-0056263	Label: Fuel inlet not labeled as required
B93A625EK02007549	935.911-C-0056795	Label: Fuel inlet not labeled as required
B93A625EC02007540	935.911-C-0056802	Label: Fuel inlet not labeled as required
B93A625EE02007626	935.911-C-0057515	Label: Fuel inlet not labeled as required
B93A625EK02007597	935.911-C-0057805	Label: Fuel inlet not labeled as required
B93A625EC02007627	935.911-C-0057808	Label: Fuel inlet not labeled as required
B93A625EP02007582	935.911-C-0057816	Label: Fuel inlet not labeled as required
B93A625EJ02007598	935.911-C-0057819	Label: Fuel inlet not labeled as required
B93A625EK02007583	935.911-C-0057843	Label: Fuel inlet not labeled as required
B93A625EH02007625	935.911-C-0060289	Label: Fuel inlet not labeled as required
B93A625ET02007628	935.911-C-0060295	Label: Fuel inlet not labeled as required
B93A625EL02007624	935.911-C-0060301	Label: Fuel inlet not labeled as required
AEBJ850ET02007288	935.911-C-0060314	Label: Fuel inlet not labeled as required
B93A625EP02007615	935.911-C-0060323	Label: Fuel inlet not labeled as required
AEBJ850EC02007287	935.911-C-0060327	Label: Fuel inlet not labeled as required
B93A625EH02007642	935.911-C-0062615	Label: Fuel inlet not labeled as required
B93A625EJ02007651	935.911-C-0062625	Label: Fuel inlet not labeled as required
B93A625EP02007677	935.911-C-0062637	Label: Fuel inlet not labeled as required
B93A625EP02007646	935.911-C-0062645	Label: Fuel inlet not labeled as required
B93A625EA02007654	935.911-C-0062655	Label: Fuel inlet not labeled as required
B93A625EK02007678	935.911-C-0062662	Label: Fuel inlet not labeled as required
B93A625EE02007657	935.911-C-0064096	Label: Fuel inlet not labeled as required
B93A625ET02007659	935.911-C-0064100	Label: Fuel inlet not labeled as required
B93A625EL02007655	935.911-C-0064105	Label: Fuel inlet not labeled as required
B93A625EC02007692	935.911-C-0064111	Label: Fuel inlet not labeled as required
B93A625EE02007710	935.911-C-0066044	Label: Fuel inlet not labeled as required
B93A625EH02007687	935.911-C-0066055	Label: Fuel inlet not labeled as required
B93A625EA02007721	935.911-C-0066064	Label: Fuel inlet not labeled as required
B93A625EJ02007679	935.911-C-0066070	Label: Fuel inlet not labeled as required
B93A625EC02007689	935.911-C-0066077	Label: Fuel inlet not labeled as required
B93A625EE02007691	935.911-C-0067000	Label: Fuel inlet not labeled as required
B93A625EC02007716	935.911-C-0068274	Label: Fuel inlet not labeled as required
B93A625ET02007693	935.911-C-0068278	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A625EE02007724	935.911-C-0069890	Label: Fuel inlet not labeled as required
B93A625EK02007745	935.911-C-0073905	Label: Fuel inlet not labeled as required
B93A631EC02007073	935.912-C-0024060	Label: Fuel inlet not labeled as required
B93A631EE02007069	935.912-C-0024070	Label: Fuel inlet not labeled as required
B93A631EA02007102	935.912-C-0024086	Label: Fuel inlet not labeled as required
B93A631EE02007072	935.912-C-0024096	Label: Fuel inlet not labeled as required
B93A631EJ02007113	935.912-C-0024101	Label: Fuel inlet not labeled as required
B93A631EJ02007077	935.912-C-0024105	Label: Fuel inlet not labeled as required
B93A631EH02007068	935.912-C-0024107	Label: Fuel inlet not labeled as required
B93A631EK02007076	935.912-C-0024117	Label: Fuel inlet not labeled as required
B93A631EH02007104	935.912-C-0025473	Label: Fuel inlet not labeled as required
B93A631EK02007109	935.912-C-0025494	Label: Fuel inlet not labeled as required
B93A631EP02007111	935.912-C-0025521	Label: Fuel inlet not labeled as required
B93A631EL02007103	935.912-C-0025578	Label: Fuel inlet not labeled as required
B93A631ET02007110	935.912-C-0025584	Label: Fuel inlet not labeled as required
B93A631EC02007106	935.912-C-0025923	Label: Fuel inlet not labeled as required
B93A631EE02007105	935.912-C-0025928	Label: Fuel inlet not labeled as required
B93A631EH02007149	935.912-C-0025941	Label: Fuel inlet not labeled as required
B93A631ET02007107	935.912-C-0026707	Label: Fuel inlet not labeled as required
B93A631EK02007112	935.912-C-0026721	Label: Fuel inlet not labeled as required
B93A631EC02007386	935.912-C-0028857	Label: Fuel inlet not labeled as required
B93A631EC02007226	935.912-C-0028867	Label: Fuel inlet not labeled as required
B93A631EH02007197	935.912-C-0028918	Label: Fuel inlet not labeled as required
B93A631EC02007162	935.912-C-0029799	Label: Fuel inlet not labeled as required
B93A631EJ02007273	935.912-C-0032084	Label: Fuel inlet not labeled as required
B93A631EH02007216	935.912-C-0032097	Label: Fuel inlet not labeled as required
B93A631EL02007229	935.912-C-0032122	Label: Fuel inlet not labeled as required
B93A631EE02007220	935.912-C-0032136	Label: Fuel inlet not labeled as required
B93A631ET02007219	935.912-C-0032145	Label: Fuel inlet not labeled as required
B93A631EK02007384	935.912-C-0032794	Label: Fuel inlet not labeled as required
B93A631EH02007328	935.912-C-0032798	Label: Fuel inlet not labeled as required
B93A631EC02007218	935.912-C-0032829	Label: Fuel inlet not labeled as required
B93A631EL02007277	935.912-C-0032835	Label: Fuel inlet not labeled as required
B93A631EV02007325	935.912-C-0033003	Label: Fuel inlet not labeled as required
B93A631EA02007357	935.912-C-0033031	Label: Fuel inlet not labeled as required
B93A631EH02007281	935.912-C-0034326	Label: Fuel inlet not labeled as required
B93A631EV02007258	935.912-C-0034332	Label: Fuel inlet not labeled as required
AEBJ658EC02007431	935.912-C-0034340	Label: Fuel inlet not labeled as required
B93A631EC02007257	935.912-C-0034346	Label: Fuel inlet not labeled as required
B93A631EP02007268	935.912-C-0034356	Label: Fuel inlet not labeled as required
B93A631EA02007262	935.912-C-0034362	Label: Fuel inlet not labeled as required
B93A631EL02007232	935.912-C-0034926	Label: Fuel inlet not labeled as required
B93A631EC02007302	935.912-C-0035019	Label: Fuel inlet not labeled as required
B93A631EE02007282	935.912-C-0035040	Label: Fuel inlet not labeled as required
B93A631EC02007274	935.912-C-0035076	Label: Fuel inlet not labeled as required
B93A631EC02007333	935.912-C-0036205	Label: Fuel inlet not labeled as required
B93A631EH02007345	935.912-C-0036238	Label: Fuel inlet not labeled as required
B93A631EE02007279	935.912-C-0036247	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A631EV02007339	935.912-C-0036296	Label: Fuel inlet not labeled as required
B93A631ET02007334	935.912-C-0036359	Label: Fuel inlet not labeled as required
B93A631EJ02007340	935.912-C-0036380	Label: Fuel inlet not labeled as required
B93A631EJ02007354	935.912-C-0038238	Label: Fuel inlet not labeled as required
B93A631EV02007356	935.912-C-0038244	Label: Fuel inlet not labeled as required
B93A631EP02007366	935.912-C-0038287	Label: Fuel inlet not labeled as required
B93A631ET02007351	935.912-C-0038292	Label: Fuel inlet not labeled as required
B93A631EP02007352	935.912-C-0038304	Label: Fuel inlet not labeled as required
B93A631EL02007344	935.912-C-0038312	Label: Fuel inlet not labeled as required
B93A631EK02007367	935.912-C-0039638	Label: Fuel inlet not labeled as required
B93A631EV02007390	935.912-C-0039679	Label: Fuel inlet not labeled as required
B93A631EP02007402	935.912-C-0045515	Label: Fuel inlet not labeled as required
B93A631EL02007411	935.912-C-0045518	Label: Fuel inlet not labeled as required
B93A631ET02007401	935.912-C-0045531	Label: Fuel inlet not labeled as required
B93A631EP02007531	935.912-C-0051977	Label: Fuel inlet not labeled as required
B93A631EK02007532	935.912-C-0053736	Label: Fuel inlet not labeled as required
B93A631ET02007530	935.912-C-0053744	Label: Fuel inlet not labeled as required
B93A631EA02007570	935.912-C-0054634	Label: Fuel inlet not labeled as required
B93A631EC02007543	935.912-C-0054650	Label: Fuel inlet not labeled as required
B93A631ET02007575	935.912-C-0054666	Label: Fuel inlet not labeled as required
B93A631EK02007546	935.912-C-0054674	Label: Fuel inlet not labeled as required
B93A631ET02007544	935.912-C-0054677	Label: Fuel inlet not labeled as required
B93A631EJ02007547	935.912-C-0054681	Label: Fuel inlet not labeled as required
B93A631EC02007574	935.912-C-0054693	Label: Fuel inlet not labeled as required
B93A631EP02007576	935.912-C-0054697	Label: Fuel inlet not labeled as required
B93A631EK02007577	935.912-C-0054711	Label: Fuel inlet not labeled as required
B93A631EK02007529	935.912-C-0054727	Label: Fuel inlet not labeled as required
B93A631EC02007548	935.912-C-0055450	Label: Fuel inlet not labeled as required
B93A631EC02007579	935.912-C-0056866	Label: Fuel inlet not labeled as required
B93A631ET02007589	935.912-C-0056915	Label: Fuel inlet not labeled as required
B93A631EJ02007600	935.912-C-0057602	Label: Fuel inlet not labeled as required
B93A631EJ02007595	935.912-C-0057838	Label: Fuel inlet not labeled as required
B93A631EC02007588	935.912-C-0058553	Label: Fuel inlet not labeled as required
B93A631EL02007618	935.912-C-0058559	Label: Fuel inlet not labeled as required
B93A631EC02007607	935.912-C-0058563	Label: Fuel inlet not labeled as required
B93A631EK02007613	935.912-C-0060855	Label: Fuel inlet not labeled as required
B93A631ET02007608	935.912-C-0060859	Label: Fuel inlet not labeled as required
B93A631EL02007554	935.912-C-0062382	Label: Fuel inlet not labeled as required
B93A631EJ02007645	935.912-C-0062442	Label: Fuel inlet not labeled as required
B93A631EL02007649	935.912-C-0063854	Label: Fuel inlet not labeled as required
B93A631EL02007652	935.912-C-0063881	Label: Fuel inlet not labeled as required
B93A631ET02007656	935.912-C-0063884	Label: Fuel inlet not labeled as required
B93A631EC02007680	935.912-C-0065451	Label: Fuel inlet not labeled as required
B93A631ET02007723	935.912-C-0066932	Label: Fuel inlet not labeled as required
B93A631EK02007725	935.912-C-0066986	Label: Fuel inlet not labeled as required
B93A631EH02007684	935.912-C-0066991	Label: Fuel inlet not labeled as required
B93A631EA02007682	935.912-C-0066995	Label: Fuel inlet not labeled as required
B93A631EV02007681	935.912-C-0067008	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A631ET02007690	935.912-C-0067013	Label: Fuel inlet not labeled as required
B93A631EL02007683	935.912-C-0067753	Label: Fuel inlet not labeled as required
B93A631EK02007711	935.912-C-0069521	Label: Fuel inlet not labeled as required
B93A631EC02007722	935.912-C-0069953	Label: Fuel inlet not labeled as required
B93A336DK07204244	941.992-C-0871928	Label: Fuel inlet not labeled as required
B93A336DC07204305	941.992-C-0871933	Label: Fuel inlet not labeled as required
B93A336DK07204373	941.992-C-0886543	Label: Fuel inlet not labeled as required
B93A336DV07204376	941.992-C-0886822	Label: Fuel inlet not labeled as required
B93A336DA07204377	941.992-C-0887062	Label: Fuel inlet not labeled as required
B93A336DP07204386	941.992-C-0887120	Label: Fuel inlet not labeled as required
B93A336DT07204385	941.992-C-0887160	Label: Fuel inlet not labeled as required
B93A336DE07204478	941.992-C-0889513	Label: Fuel inlet not labeled as required
B93A336DA07204427	941.992-C-0889562	Label: Fuel inlet not labeled as required
B93A336DA07204542	941.992-C-0889732	Label: Fuel inlet not labeled as required
B93A336DJ07204469	941.992-C-0889758	Label: Fuel inlet not labeled as required
B93A336DJ07204424	941.992-C-0889763	Label: Fuel inlet not labeled as required
B93A336DL07204431	941.992-C-0889770	Label: Fuel inlet not labeled as required
B93A336DE07204481	941.992-C-0889783	Label: Fuel inlet not labeled as required
B93A336DE07204545	941.992-C-0889811	Label: Fuel inlet not labeled as required
B93A336DK07204423	941.992-C-0889824	Label: Fuel inlet not labeled as required
B93A336DC07204465	941.992-C-0889831	Label: Fuel inlet not labeled as required
B93A336DJ07204438	941.992-C-0889838	Label: Fuel inlet not labeled as required
B93A336DC07204498	941.992-C-0889844	Label: Fuel inlet not labeled as required
B93A336DH07204480	941.992-C-0889850	Label: Fuel inlet not labeled as required
B93A336DT07204547	941.992-C-0889891	Label: Fuel inlet not labeled as required
B93A336DP07204548	941.992-C-0889902	Label: Fuel inlet not labeled as required
B93A336DT07204466	941.992-C-0889907	Label: Fuel inlet not labeled as required
B93A336DJ07204486	941.992-C-0890124	Label: Fuel inlet not labeled as required
B93A336DP07204534	941.992-C-0890204	Label: Fuel inlet not labeled as required
B93A336DK07204471	941.992-C-0890235	Label: Fuel inlet not labeled as required
B93A336DP07204470	941.992-C-0890244	Label: Fuel inlet not labeled as required
B93A336DE07204416	941.992-C-0890274	Label: Fuel inlet not labeled as required
B93A340DL07204394	941.992-C-0891425	Label: Fuel inlet not labeled as required
B93A340DP07204435	941.992-C-0891886	Label: Fuel inlet not labeled as required
B93A336DT07204449	941.992-C-0894234	Label: Fuel inlet not labeled as required
B93A336DH07204446	941.992-C-0894288	Label: Fuel inlet not labeled as required
B93A336DV07204426	941.992-C-0894335	Label: Fuel inlet not labeled as required
B93A336DC07204442	941.992-C-0894364	Label: Fuel inlet not labeled as required
B93A336DL07204445	941.992-C-0894373	Label: Fuel inlet not labeled as required
B93A336DH07204429	941.992-C-0894383	Label: Fuel inlet not labeled as required
B93A336DE07204464	941.992-C-0894395	Label: Fuel inlet not labeled as required
B93A336DC07204420	941.992-C-0894423	Label: Fuel inlet not labeled as required
B93A336DC07204546	941.992-C-0894433	Label: Fuel inlet not labeled as required
B93A336DC07204434	941.992-C-0894452	Label: Fuel inlet not labeled as required
B93A336DV07204512	941.992-C-0894462	Label: Fuel inlet not labeled as required
B93A336DK07204518	941.992-C-0894470	Label: Fuel inlet not labeled as required
B93A336DL07204543	941.992-C-0894493	Label: Fuel inlet not labeled as required
B93A336DK07204468	941.992-C-0894519	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A336DP07204467	941.992-C-0894534	Label: Fuel inlet not labeled as required
B93A336DJ07204472	941.992-C-0894550	Label: Fuel inlet not labeled as required
B93A336DH07204544	941.992-C-0894558	Label: Fuel inlet not labeled as required
B93A336DC07204532	941.992-C-0895032	Label: Fuel inlet not labeled as required
B93A336DP07204517	941.992-C-0895095	Label: Fuel inlet not labeled as required
B93A340DV07204604	941.992-C-0898331	Label: Fuel inlet not labeled as required
B93A340DK07204551	941.992-C-0898345	Label: Fuel inlet not labeled as required
B93A336DK07204506	941.992-C-0902221	Label: Fuel inlet not labeled as required
B93A336DC07204503	941.992-C-0902244	Label: Fuel inlet not labeled as required
B93A336DA07204489	941.992-C-0902258	Label: Fuel inlet not labeled as required
B93A336DL07204493	941.992-C-0902267	Label: Fuel inlet not labeled as required
B93A336DE07204497	941.992-C-0902277	Label: Fuel inlet not labeled as required
B93A336DL07204500	941.992-C-0902283	Label: Fuel inlet not labeled as required
B93A336DT07204533	941.992-C-0902295	Label: Fuel inlet not labeled as required
B93A336DC07204487	941.992-C-0902306	Label: Fuel inlet not labeled as required
B93A336DK07204633	941.992-C-0912733	Label: Fuel inlet not labeled as required
B93A336DA07204668	941.992-C-0912742	Label: Fuel inlet not labeled as required
B93A336DA07204606	941.992-C-0912748	Label: Fuel inlet not labeled as required
B93A340DH07204591	941.992-C-0912759	Label: Fuel inlet not labeled as required
B93A340DK07204615	941.992-C-0913450	Label: Fuel inlet not labeled as required
B93A336DA07204640	941.992-C-0915702	Label: Fuel inlet not labeled as required
B93A336DH07204642	941.992-C-0915760	Label: Fuel inlet not labeled as required
B93A336DV07204653	941.992-C-0915771	Label: Fuel inlet not labeled as required
B93A336DK07204647	941.992-C-0915775	Label: Fuel inlet not labeled as required
B93A336DC07204661	941.992-C-0915787	Label: Fuel inlet not labeled as required
B93A340DJ07204695	941.992-C-0917609	Label: Fuel inlet not labeled as required
B93A340DC07204691	941.992-C-0917637	Label: Fuel inlet not labeled as required
B93A340DP07204693	941.992-C-0917643	Label: Fuel inlet not labeled as required
B93A340DC07204696	941.992-C-0917679	Label: Fuel inlet not labeled as required
B93A336DL07204672	941.992-C-0920369	Label: Fuel inlet not labeled as required
B93A336DE07204724	941.992-C-0921190	Label: Fuel inlet not labeled as required
B93A336DA07204752	941.992-C-0921225	Label: Fuel inlet not labeled as required
B93A336DP07204730	941.992-C-0921242	Label: Fuel inlet not labeled as required
B93A336DH07204768	941.992-C-0921250	Label: Fuel inlet not labeled as required
B93A336DL07204767	941.992-C-0921297	Label: Fuel inlet not labeled as required
B93A336DP07204727	941.992-C-0921308	Label: Fuel inlet not labeled as required
B93A336DA07204721	941.992-C-0921339	Label: Fuel inlet not labeled as required
B93A336DA07204637	941.992-C-0921351	Label: Fuel inlet not labeled as required
B93A336DC07204756	941.992-C-0921360	Label: Fuel inlet not labeled as required
B93A336DL07204722	941.992-C-0921378	Label: Fuel inlet not labeled as required
B93A350DL07505480	942.993-C-0993958	Label: Fuel inlet not labeled as required
B93A350DH07505481	942.993-C-0993978	Label: Fuel inlet not labeled as required
B93A350DT07505484	942.993-C-0993986	Label: Fuel inlet not labeled as required
B93A350DT07505503	942.993-C-0993998	Label: Fuel inlet not labeled as required
B93A350DC07505488	942.993-C-0993399	Label: Fuel inlet not labeled as required
B93A350DV07505489	942.993-C-0993423	Label: Fuel inlet not labeled as required
B93A350DP07505499	942.993-C-0995093	Label: Fuel inlet not labeled as required
B93A350DT07505498	942.993-C-0995133	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A350DJ07505506	942.993-C-0994449	Label: Fuel inlet not labeled as required
B93A350DK07505505	942.993-C-0994456	Label: Fuel inlet not labeled as required
B93A350DJ07204492	942.993-C-0889633	Label: Fuel inlet not labeled as required
B93A350DE07204520	942.993-C-0889640	Label: Fuel inlet not labeled as required
B93A350DH07204404	942.993-C-0889652	Label: Fuel inlet not labeled as required
B93A350DP07204439	942.993-C-0895411	Label: Fuel inlet not labeled as required
B93A350DV07204477	942.993-C-0895438	Label: Fuel inlet not labeled as required
B93A350DP07204537	942.993-C-0901245	Label: Fuel inlet not labeled as required
B93A350DL07304971	942.993-C-0901249	Label: Fuel inlet not labeled as required
B93A350DC07204552	942.993-C-0901560	Label: Fuel inlet not labeled as required
B93A350DT07204505	942.993-C-0901957	Label: Fuel inlet not labeled as required
B93A350DA07505493	942.993-C-0994466	Label: Fuel inlet not labeled as required
B93A350DH07505495	942.993-C-0994502	Label: Fuel inlet not labeled as required
B93A340DP07505500	941.992-C-0974454	Label: Fuel inlet not labeled as required
B93A350DA07505428	942.993-C-0909627	Label: Fuel inlet not labeled as required
B93A350DP07505437	942.993-C-0914374	Label: Fuel inlet not labeled as required
B93A350DJ07505439	942.993-C-0915297	Label: Fuel inlet not labeled as required
B93A350DJ07505442	942.993-C-0917110	Label: Fuel inlet not labeled as required
B93A350DC07505491	942.993-C-0921631	Label: Fuel inlet not labeled as required
B93A350DC07505497	942.993-C-0921648	Label: Fuel inlet not labeled as required
B93A350DC07505507	942.993-C-0994433	Label: Fuel inlet not labeled as required
AEBA340DK07505478	941.992-C-0911348	Label: Fuel inlet not labeled as required
AEBA340DA07505518	941.992-C-0911392	Label: Fuel inlet not labeled as required
AEBA340DC07505525	941.992-C-0911416	Label: Fuel inlet not labeled as required
AEBA340DH07505487	941.992-C-0911429	Label: Fuel inlet not labeled as required
AEBA340DL07505486	941.992-C-0911552	Label: Fuel inlet not labeled as required
B93A340DT07505494	941.992-C-0911441	Label: Fuel inlet not labeled as required
B93A350DH07505464	942.993-C-0914632	Label: Fuel inlet not labeled as required
B93A350DC07505457	942.993-C-0921498	Label: Fuel inlet not labeled as required
B93A350DC07505460	942.993-C-0921520	Label: Fuel inlet not labeled as required
B93A350DV07505461	942.993-C-0921595	Label: Fuel inlet not labeled as required
B93A350DA07505512	942.993-C-0995105	Label: Fuel inlet not labeled as required
B93A340DJ07505502	941.992-C-0911370	Label: Fuel inlet not labeled as required
B93A340DA07505522	941.992-C-0911375	Label: Fuel inlet not labeled as required
B93A350DV07505511	942.993-C-0915339	Label: Fuel inlet not labeled as required
B93A340DV07505521	941.992-C-0911608	Label: Fuel inlet not labeled as required
AEBA660EL00005591	473.905-C-0136616	Label: Fuel inlet not labeled as required
B93A640EV01105557	471.919-C-0262323	Label: Fuel inlet not labeled as required
B93A640EC01105551	471.919-C-0261838	Label: Fuel inlet not labeled as required
B93A640EC01105565	471.919-C-0267062	Label: Fuel inlet not labeled as required
B93A640EE01105533	471.919-C-0258442	Label: Fuel inlet not labeled as required
B93A640EE01105550	471.919-C-0246053	Label: Fuel inlet not labeled as required
B93A640EJ01105555	471.919-C-0262281	Label: Fuel inlet not labeled as required
B93A640EP01105567	471.919-C-0266995	Label: Fuel inlet not labeled as required
B93A640EV01105607	471.919-C-0267487	Label: Fuel inlet not labeled as required
B93A640EA01105608	471.919-C-0262185	Label: Fuel inlet not labeled as required
AEBA660EV00005619	473.905-C-0233453	Label: Fuel inlet not labeled as required
B93A645EL01105621	471.919-C-0274917	Label: Fuel inlet not labeled as required

<b>Equipment VIN</b>	<b>Engine Serial Number</b>	<b>Violation Type</b>
B93A645EC01105641	471.919-C-0273278	Label: Fuel inlet not labeled as required
AEBA660EH00005589	473.905-C-0238297	Label: Fuel inlet not labeled as required
AEBJ850ET02007808	935.911C0066059	Label: Fuel inlet not labeled as required
B93A625EA02007685	935.911C0073926	Label: Fuel inlet not labeled as required
B93A625EC02007750	935.911C0073769	Label: Fuel inlet not labeled as required
B93A625EL02007686	935.911C0073879	Label: Fuel inlet not labeled as required
B93A625EV02007751	935.911C0075178	Label: Fuel inlet not labeled as required
B93A631EE02007766	935.912-C-0075214	Label: Fuel inlet not labeled as required
B93A631EH02007748	935.912-C-0073781	Label: Fuel inlet not labeled as required
B93A631EP02007741	935.912-C-0074969	Label: Fuel inlet not labeled as required
B93A640EC01105534	471.919-C-0258543	Label: Fuel inlet not labeled as required
B93A640EC01105539	471.919-C-0258484	Label: Fuel inlet not labeled as required
B93A640EH01105532	471.919-C-0258523	Label: Fuel inlet not labeled as required
B93A640EK01105537	471.919-C-0258453	Label: Fuel inlet not labeled as required
B93A640EP01105536	471.919-C-0258503	Label: Fuel inlet not labeled as required
B93A640EP01105584	471.919-C-0267094	Label: Fuel inlet not labeled as required
B93A640EV01105588	471.919-C-0261849	Label: Fuel inlet not labeled as required



The foregoing Consent Agreement In the Matter of Bell Trucks America, Inc. and Bell Equipment Limited, Docket No. CAA-AED-2017-8351, is Hereby Stipulated, Agreed, and Approved for Entry.

**For Bell Trucks America, Inc.:**

 \_\_\_\_\_ 03/13/2017  
Signature Date

Printed Name: Shannon S. Broome

Title: Counsel for Bell Trucks America, Inc.

Address: Hunton & Williams, LLP, 2200 Pennsylvania Ave., NW, Washington, DC 20037

Respondent's Federal Tax Identification Number: 46-1596705

The foregoing Consent Agreement In the Matter of Bell Trucks America, Inc. and Bell Equipment Limited, Docket No. CAA-AED-2017-8351, is Hereby Stipulated, Agreed, and Approved for Entry.

**For Bell Equipment Limited:**

 \_\_\_\_\_ 03/13/2017 \_\_\_\_\_  
Signature Date

Printed Name: Shannon S. Broome

Title: Counsel for Bell Equipment Limited

Address: Hunton & Williams, LLP, 2200 Pennsylvania Ave., NW, Washington, DC 20037

Respondent's Federal Tax Identification Number: N/A

The foregoing Consent Agreement In the Matter of Bell Trucks America, Inc. and Bell Equipment Limited, Docket No. CAA-AED-2017-8351, is Hereby Stipulated, Agreed, and Approved for Entry.

**For Complainant:**



Phillip A. Brooks, Director  
Air Enforcement Division  
Office of Civil Enforcement  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001

3/17/2017  
Date



Evan Belser, Chief  
Vehicle and Engine Enforcement Branch  
Air Enforcement Division  
Office of Civil Enforcement  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001  
(202) 564-6850  
Belser.evan@epa.gov

March 17, 2017  
Date

**BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**

In the Matter of:

Bell Trucks America, Inc.  
Bell Equipment Limited

Respondents.

Docket No.  
CAA-AED-2017-8351

**FINAL ORDER**

Pursuant to 40 C.F.R. § 22.18(b) of the EPA's Consolidated Rules of Practice and section 205(c)(1) of the Clean Air Act, 42 U.S.C. § 7524(c)(1), the attached Consent Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified.

The Respondents are ORDERED to comply with all terms of the Consent Agreement, effective immediately.

So ordered.

Date:

\_\_\_\_\_  
[NAME OF JUDGE]  
Judge, Environmental Appeals Board

CERTIFICATE OF SERVICE

I certify that the foregoing "Consent Agreement" and "Final Order," In the Matter of Bell Trucks America, Inc. and Bell Equipment Limited, Docket No. CAA-AED-2017-8351 were filed and copies of the same were mailed to the parties as indicated below.

**Via Interoffice Mail:**

Evan Belser, US EPA, Air Enforcement Division  
1200 Pennsylvania Avenue, N.W.  
Mail Code 2242A  
William Jefferson Clinton Federal Building Room 1109B  
Washington, D.C. 20460

**Via U.S.P.S. Certified Mail:**

Shannon S. Broome  
Hunton & Williams LLP  
2200 Pennsylvania Ave., NW  
Washington, DC 20037

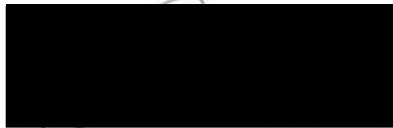
Dated: \_\_\_\_\_  
Annette Duncan, Secretary  
U.S. Environmental Protection Agency  
Environmental Appeals Board

CERTIFICATE OF SERVICE

I certify that on the date below I filed by hand delivery with the Environmental Appeals Board at the address listed below the original and one copy of the foregoing "Consent Agreement" and "Final Order," In the Bell Trucks America, Inc. and Bell Equipment Limited, Docket No. CAA-AED-2017-8351.

Clerk of the Board  
U.S. Environmental Protection Agency  
Environmental Appeals Board  
1201 Constitution Avenue, NW  
WJC East Building, Room 3334  
Washington, D.C. 20004

I certify that on the date below I sent Respondents a copy of the foregoing "Consent Agreement" and "Final Order," along with the transmittal memorandum from the Office of Civil Enforcement, to counsel for Respondents, Shannon S. Broome, at Broome, at SBroome@hunton.com.



\_\_\_\_\_  
Evan Belser, Chief  
Vehicle and Engine Enforcement Branch  
Air Enforcement Division  
Office of Civil Enforcement  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001  
(202) 564-6850  
Belser.evan@epa.gov

March 22, 2017  
Date

**BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**



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In re: )  
 )  
Bell Trucks America, Inc. & )  
Bell Equipment Limited ) Docket No. CAA-HQ-2016-7854  
 )  
 )

---

**FINAL ORDER**

Pursuant to 40 C.F.R. § 22.18(b)-(c) of EPA's Consolidated Rules of Practice and section 205(c)(1) of the Clean Air Act, 40 U.S.C. § 7524(c)(1), the attached Consent Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified.

The Respondent is ORDERED to comply with all terms of the Consent Agreement, effective immediately.

So ordered.<sup>1</sup>

Date: **MAR 31 2017**

  
Mary Kay Lynch  
Judge, Environmental Appeals Board

---

<sup>1</sup> The three-member panel ratifying this matter is composed of Environmental Appeals Judges Aaron P. Avila, Mary Kay Lynch, and Kathie A. Stein.

## CERTIFICATE OF SERVICE

I certify that the foregoing "Consent Agreement" and "Final Order," in the Matter of *Bell Trucks Americas, Inc. & Bell Equipment Limited.*, Docket No. CAA-AED-2017-8351, were filed and copies of the same were mailed to the parties as indicated below:

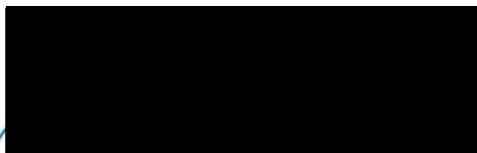
### **Via Interoffice Mail:**

Evan Belser, US EPA, Air Enforcement Division  
1200 Pennsylvania Avenue, N.W. (Mail Code 2242A)  
William Jefferson Clinton Federal Building, Room 1109B  
Washington, D.C. 20460

### **Via U.S. Certified Mail:**

Shannon S. Broome  
Hunton & Williams LLP  
2200 Pennsylvania Ave., NW  
Washington, DC 20037

Dated: March 31, 2017



Annette Duncan, Administrative Specialist  
U.S. Environmental Protection Agency  
Environmental Appeals Board