

Enclosure 2
Expedited Settlement Alleged Violations and Final Adjusted Penalty Summary

Table 1 - Information Collection	
Date(s) Information Collected:	Docket Number:
12/31/2025	CAA-10-2026-0058
Respondent Location:	
2101 Queen Street	
City:	Inspector Name:
Bellingham	Alexander Liebert
State and Zip Code:	EPA Approving Official:
Washington 99212	Edward J. Kowalski
Respondent:	EPA Enforcement Contact:
Northwest European Autoworks	Alexander Liebert

Table 2 - Description of Violations and Vehicles/Engines
<p>EPA obtained evidence that Northwest European Autoworks (Respondent) tampered with the vehicle(s)/engine(s) listed below. EPA obtained evidence that Respondent installed, and/or sold, and/or offered for sale the products listed under Defeat Device Violation(s). The products are parts or components intended for use with, or as part of, a motor vehicle. The principal effect of each of the products listed is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle in compliance with regulations under Clean Air Act Title II. Respondent knew or should have known that the products listed below was installed for such use.</p> <p>EPA obtained evidence that Respondent removed or rendered inoperative the devices or elements of design listed below under Tampered Motor Vehicle/Engine Violations. The devices or elements of design were installed on or in motor vehicles or motor vehicle engines in compliance with the regulations under Clean Air Act Title II. Respondent knowingly removed the devices or elements of design.</p> <p>It is a violation of Section 203(a)(3)(A) of the CAA, 42 U.S.C. § 7522(a)(3)(A) to tamper with EPA-certified vehicles and engines. It is a violation of Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B) to sell, offer for sale, and install a defeat device intended for use with EPA-certified motor vehicles and engines. Based on information summarized below, EPA finds that Respondent has committed 27 violations of Section 203(a)(3) of the CAA, 42 U.S.C. § 7522(a)(3).</p>

Defeat Device Violation (s) installed on vehicles below					
Defeat Device Description	Make	Part #	Quantity	Sold, installed, and/or offered for sale?	Date Range
Stainless Exhaust	RAWTEK	MB.1.SPR.30D .CR	9	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	MB.1.SPR.21D .SP	2	y	2/15/2024-10/19/2025
Stainless	RAWTEK	BM.1.X5D.N5	2	y	2/15/2024-10/19/2025

Exhaust		7.CR			
Stainless Exhaust	RAWTEK	BM.1.N47.DP F.CR	1	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	BM.1.335.M5 7.DPF	4	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	BM.1.535.N5 7.SP	1	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	VA.1.TG1.V6D .EK	1	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	UNKNOWN	4	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	UNKNOWN	1	y	2/15/2024-10/19/2025
Stainless Exhaust	RAWTEK	VA.1.Q51.V6D .CX	1	y	2/15/2024-10/19/2025

Tampered Motor Vehicle/Engine Violation(s)

Tampering Date(s)	Model Year	Make	Model	Tampered Emission Parts or Components
2/15/2024	2012	VW	TOUAREG	EGR, SCR, DPF, DEF
2/15/2024	2011	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
3/14/2024	2015	AUDI	Q5 TDI	EGR, SCR, DPF, DEF
3/20/2024	2021	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
4/17/2024	2014	BMW	328 D	EGR, SCR, DPF, DEF
3/27/2024	2010	BMW	335D	EGR, SCR, DPF, DEF
5/21/2024	2017	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
5/28/2024	2010	BMW	X5 D	EGR, SCR, DPF, DEF
7/30/2024	2016	BMW	535 D	EGR, SCR, DPF, DEF
8/12/2024	2016	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
8/20/2024	2015	VW	TOUAREG	EGR, SCR, DPF, DEF
9/13/2024	2016	BMW	X5 D	EGR, SCR, DPF, DEF
11/27/2024	2016	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
12/18/2024	2018	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
3/17/2025	2012	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
3/27/2025	2016	AUDI	A7 TDI	EGR, SCR, DPF, DEF
6/6/2025	2012	VW	JETTA TDI	EGR, SCR, DPF, DEF
7/25/2025	2019	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
8/1/2025	2016	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF
11/18/2024	2013	AUDI	Q7	EGR, SCR, DPF, DEF
8/19/2025	2017	MERCEDES	SPRINTER	EGR, SCR, DPF, DEF

8/20/2025	2015	PORSCHE	CAYENNE	EGR, SCR, DPF, DEF
8/26/2025	2001	VW	JETTA TDI	EGR, SCR, DPF, DEF
9/8/2025	2014	AUDI	A6 TDI	EGR, SCR, DPF, DEF
10/10/2025	2012	VW	JETTA TDI	EGR, SCR, DPF, DEF
11/10/2025	2013	VW	GOLF TDI	EGR, SCR, DPF, DEF
10/19/2025	2012	VW	PASSAT TDI	EGR, SCR, DPF, DEF

Table 3 - Penalty and Required Remediation	
Penalty	\$31,712.40