

FILED

Sep 30, 2026

3:18 pm

**U.S. EPA REGION 3
HEARING CLERK**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103**

In the Matter of:

**TurboXS
1007 Tibbetts Lane
New Windsor, Maryland 21776**

Respondent.

:
:
: **U.S. EPA Docket No. CAA-03-2026-0268**
:
: **Proceeding under Section 205(c)(1) of the Clean**
: **Air Act, 42 U.S.C. § 7524(c)(1)**
:
:

CONSENT AGREEMENT

PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3 ("Complainant") and TurboXS ("Respondent" or "TurboXS") (collectively the "Parties"), pursuant to Section 205(c)(1) of the Clean Air Act ("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 ("Consolidated Rules of Practice"), 40 C.F.R. Part 22. The CAA authorizes the Administrator of the U.S. Environmental Protection Agency to assess penalties and undertake other actions required by this Consent Agreement. The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated the authority to enter into agreements concerning administrative penalties to the Complainant. This Consent Agreement and the attached Final Order (hereinafter jointly referred to as the "Consent Agreement and Final Order") resolve Complainant's civil penalty claims against Respondent under the CAA for the violations alleged herein.
2. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves this administrative proceeding.

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

JURISDICTION

3. The U.S. Environmental Protection Agency (“EPA”) has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
4. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(2).

GENERAL PROVISIONS

5. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.
6. Except as provided in Paragraph 5 above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement.
7. Except as provided in Paragraph 5 above, Respondent neither admits nor denies the alleged violations of law set forth in this Consent Agreement.
8. Respondent agrees not to contest the jurisdiction of the EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this Consent Agreement and Final Order.
9. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and Final Order and waives its right to appeal the accompanying Final Order.
10. Respondent consents to the assessment of the civil penalty stated herein, to the issuance of any specified compliance order herein, and to any conditions specified herein.
11. Respondent shall bear its own costs and attorney’s fees in connection with this proceeding.
12. By signing this Consent Agreement, Respondent waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order accompanying the Consent Agreement.

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

FINDINGS OF FACT AND CONCLUSIONS OF LAW

13. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges and adopts the Findings of Fact and Conclusions of Law set forth immediately below.
14. Respondent is a corporation organized under the laws of the state of Maryland, and, at all times relevant to the violations alleged herein, was the owner of an automobile parts sale and distribution facility located at 1007 Tibbetts Lane, New Windsor, Maryland 21776 (hereinafter “the Facility”).
15. At all times relevant to the violations alleged in this Consent Agreement and Final Order, Respondent was and is a “person” as that term is defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e), and is subject to the assessment of civil penalties for the violations alleged herein.
16. This proceeding arises under Part A of Title II of the CAA, 42 U.S.C. §§ 7521-7554, and the regulations promulgated thereunder. These laws aim to reduce emissions from mobile sources of air pollution, including non-methane hydrocarbons, particulate matter, oxides of nitrogen, and carbon monoxide.
17. In creating the CAA, Congress found, in part, that “the increasing use of motor vehicles...has resulted in mounting dangers to the public health and welfare.” 42 U.S.C. § 7401(a)(2). Congress’ purpose in enacting the CAA, in part, was “to protect and enhance the quality of the Nation’s air resources so as to promote the public health and welfare and the productive capacity of its population,” and “to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution.” 42 U.S.C. § 7401(b)(1)-(2).

The EPA Certification Program

18. Section 203(a)(1) of the CAA, 42 U.S.C. § 7522(a)(1), prohibits a vehicle manufacturer from selling a new motor vehicle in the United States unless the vehicle is covered by a certificate of conformity (“COC”).
19. “Motor vehicle” is defined in section 216(2) of the CAA, 42 U.S.C. § 7550(2), as “any self-propelled vehicle designed for transporting persons or property on a street or highway.”
20. Manufacturers of new motor vehicles or motor vehicle engines, (“original equipment manufacturers” or “OEMs”), must obtain a COC from the EPA to sell, offer to sell, or introduce or deliver for introduction into commerce any new motor vehicle or motor vehicle engines in the United States. 42 U.S.C. § 7522(a)(1). The EPA administers the

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

certification program to ensure that every motor vehicle or engine introduced into United States commerce satisfies applicable emission standards.

21. Each COC application must describe, among other things, the emissions-related elements of design of the motor vehicle or motor vehicle engine. *See* 40 C.F.R. §§ 86.004-21, 86.1844-01.
22. An "element of design" means "any control system (i.e., computer software, electronic control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine." 40 C.F.R. § 86.094-2.
23. Manufacturers employ certain hardware devices as emission control systems to manage and treat exhaust to reduce levels of regulated pollutants from being created or emitted into the ambient air. Such devices include catalytic converters, Exhaust Gas Recirculation hardware ("EGR"), Diesel Particulate Filters ("DPF"), Diesel Oxidation Catalysts ("DOC"), Nitrogen Adsorber Catalysts ("NAC"), and Selective Catalytic Reduction ("SCR") systems.
24. Under Section 202(m) of the CAA, 42 U.S.C. § 7521(m), the EPA promulgated regulations requiring manufacturers of motor vehicles to install on-board diagnostic ("OBD") systems on vehicles beginning with the 2007 model year to monitor emission control components for any malfunction or deterioration causing exceedance of certain emission thresholds. The OBD system is a critical element of design of the motor vehicle and is intended to detect malfunctions and deterioration of emission-related components.

EPA Investigation

25. Pursuant to the EPA's authority under Section 208(a) of the CAA, 42 U.S.C. § 7542(a), EPA Inspectors conducted an inspection of the Facility on December 18, 2023, to determine compliance with the CAA and the regulations promulgated thereunder at its Facility (the "Inspection").
26. During the Inspection, EPA Inspectors conducted a walkthrough of the Facility and observed two employees packing parts, a Precision TIG 185 welder, a grinder, and a computer numerically controlled machine used to design automotive parts.
27. During the Inspection, EPA Inspectors observed various exhaust components in the Facility, including mufflers, intercooler pipes, mid pipes, and downpipes with catalysts.

*In the Matter of: TurboXS**EPA Docket No. CAA-03-2026-0268*

28. On March 14, 2024, pursuant to the EPA's authority under Section 208(a) of the CAA, 42 U.S.C. § 7542(a), the EPA issued a Request for Information ("RFI") to Respondent to review records.
29. Respondent provided a response to the EPA's March 14, 2024 RFI on May 15, 2024.
30. On June 16, 2025, the EPA issued Respondent a Notice to Show Cause alleging violations of the CAA and on July 29, 2025, the EPA and Respondent participated in a conference to discuss the alleged violations in the Notice to Show Cause.

Count I
Illegal Sale of Defeat Devices

31. The information and allegations in the preceding paragraphs of this Consent Agreement are incorporated herein by reference.
32. 42 U.S.C. § 7522(a)(3)(B) prohibits any person from manufacturing or selling, or offering to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use. These parts and components are hereinafter referred to as "defeat devices"
33. Pursuant to Section 205(a) of the CAA, 42 U.S.C. § 7524(a), each defeat device manufactured or sold constitutes a separate violation of Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B).
34. Based on the information provided by TurboXS during the Inspection and in response to the March 14, 2024 RFI, it is the EPA's belief that TurboXS sold no fewer than 1,619 defeat devices in the quantities specified below from at least October 2020 through March 2024:

Approximate Quantity Sold	Defeat Device	Effect on motor vehicle or motor vehicle Engine Emission Control Device or Element of Design
3	EGR Delete Hardware	Bypasses, defeats, or renders inoperative motor vehicle or motor vehicle engine EGR systems, DPF, and SCR or DOC systems.
1566	Exhaust Aftertreatment Delete Hardware	Removes aftertreatment emission control devices such as DOCs, NACs, DPFs, and SCRs

*In the Matter of: TurboXS**EPA Docket No. CAA-03-2026-0268*

50	Miscellaneous Parts	Disables emission controls or emission-related elements of design that are not otherwise captured in the categories above. Includes tuning products that disable OBD system functions (e.g., disable Diagnostic Trouble Codes)
----	---------------------	--

35. Based on the information provided by TurboXS during the Inspection and in response to the March 14, 2024 RFI, the components described in Paragraph 34 above have the principal effect to bypass, defeat, or render inoperative emission control devices or elements of design installed on or in EPA-Certified motor vehicles or motor vehicle engines.
36. Based on the information provided by TurboXS during the Inspection and in response to the March 14, 2024 RFI, Respondent designs the parts identified in Paragraph 34 and knew or should have known that each of the 1,619 defeat devices referenced in paragraph 34, above, and identified and listed in Appendix A, were being sold, offered for sale, or installed for such use or put to such use.
37. Based on the information provided by TurboXS during the Inspection and in response to the March 14, 2024 RFI, TurboXS sold no fewer than 1,619 defeat devices for motor vehicles and motor vehicle engines referenced in paragraph 34, above, and identified and listed in Appendix A from at least October 2020 through March 2024, in violation of Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B).
38. By violating Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), Respondent is subject to the assessment of penalties under Section 205(a) of the CAA, 42 U.S.C. § 7524(a).

CIVIL PENALTY

39. In settlement of the EPA's claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of *TEN THOUSAND DOLLARS* (\$10,000) ("Assessed Penalty"), which Respondent shall be liable to pay in accordance with the terms set forth below.
40. In determining the amount of the Assessed Penalty to be assessed, the EPA has taken into account the factors specified in Section 205(c)(2), 42 U.S.C. § 7524(c)(2).
41. The Assessed Penalty is also based upon an analysis of Respondent's ability to pay a civil penalty. This analysis was based upon information submitted to the EPA by TurboXS including the following: TurboXS's 2025 tax return.

*In the Matter of: TurboXS**EPA Docket No. CAA-03-2026-0268*

42. Respondent agrees to pay the Assessed Penalty within thirty (30) days of the Effective Date of this Consent Agreement and Final Order.
43. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>. Respondent acknowledges that the EPA has provided adequate notification that, prior to the Effective Date, in accordance with Executive Order 14247: Modernizing Payments To and From America's Bank Account, the EPA ceased accepting paper checks as a form of payment of civil penalties and the EPA only accepts specific electronic methods of payment as provided on the above website.
44. When making a payment, Respondent shall:
- Identify every payment with Respondent's name and the docket number of this Consent Agreement, EPA Docket No. CAA-03-2026-0268.
 - Concurrently with any payment or within 24 hours of any payment, Respondent shall serve Proof of Payment simultaneously by email to the following person(s):

John Rutherford
 Assistant Regional Counsel
Rutherford.John@epa.gov,

U.S. Environmental Protection Agency
 Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov,

and

U.S. EPA Region 3 Regional Hearing Clerk
R3_Hearing_Clerk@epa.gov.

"Proof of Payment" means, as applicable, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent's name.

45. Interest, Charges, and Penalties on Late Payments. Pursuant to 42 U.S.C. § 7524(c)(6), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the Assessed Penalty per this Consent Agreement, the entire unpaid

*In the Matter of: TurboXS**EPA Docket No. CAA-03-2026-0268*

balance of the Assessed Penalty and all accrued interest shall become immediately due and owing, and the EPA is authorized to recover the following amounts.

- a. Interest. Interest begins to accrue from the Effective Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any accrued interest, penalties, and other charges are paid in full. Per 42 U.S.C. § 7524(c)(6), interest will be assessed pursuant to 26 U.S.C. § 6621(a)(2), that is the IRS standard underpayment rate, equal to the Federal short-term rate plus 3 percentage points.
 - b. Handling Charges. The United States' enforcement expenses including, but not limited to, attorneys' fees and costs of handling collection.
 - c. Late Payment Penalty. A ten percent (10%) quarterly non-payment penalty.
46. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.
- a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14.
 - b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.
 - c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, per 40 C.F.R. § 13.17.
 - d. Request that the Attorney General bring a civil action in the appropriate district court to recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, per 42 U.S.C. § 7524(c)(6). In any such action, the validity, amount, and appropriateness of the Assessed Penalty shall not be subject to review.
47. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.

48. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.

GENERAL SETTLEMENT CONDITIONS

49. The Parties consent to service of the Final Order by email at the following valid email addresses: rutherford.john@epa.gov (for Complainant), and stewart@hassancables.com (for Respondent).
50. By signing this Consent Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and represents that, to the best of Respondent's knowledge and belief, this Consent Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.
51. Respondent certifies that any information or representation it has supplied or made to the EPA concerning this matter was, at the time of submission, true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. The EPA shall have the right to institute further actions to recover appropriate relief if the EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order, including information about Respondent's ability to pay a penalty, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that the EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

CERTIFICATION OF COMPLIANCE

52. Respondent certifies to the EPA, upon personal investigation and to the best of its knowledge and belief, that it currently is in compliance with regard to the violations alleged in this Consent Agreement.

OTHER APPLICABLE LAWS

53. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

regulations, nor shall it be construed to be a ruling on the validity of any federal, state or local permit. This Consent Agreement and Final Order does not constitute a waiver, suspension or modification of the requirements of the CAA, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

54. This Consent Agreement and Final Order resolves only the EPA's claims for civil penalties for the specific violations alleged against Respondent in this Consent Agreement and Final Order. The EPA reserves the right to commence action against any person, including Respondent, in response to any condition which the EPA determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice, 40 C.F.R. § 22.18(c). The EPA reserves any rights and remedies available to it under the CAA, the regulations promulgated thereunder and any other federal law or regulation to enforce the terms of this Consent Agreement and Final Order after its effective date.

EXECUTION/PARTIES BOUND

55. This Consent Agreement and Final Order shall apply to and be binding upon the EPA, the Respondent and the officers, directors, employees, contractors, successors, agents and assigns of Respondent. By providing the signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that the person signing is fully authorized by the Respondent to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

EFFECTIVE DATE

56. The effective date of this Consent Agreement and Final Order ("Effective Date") is the date on which the Final Order, signed by the Regional Administrator of the EPA, Region 3, or the Regional Administrator's designee, the Regional Judicial Officer, is filed along with the Consent Agreement with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

ENTIRE AGREEMENT

57. This Consent Agreement and Final Order constitutes the entire agreement and understanding between the Parties regarding settlement of all claims for civil penalties pertaining to the specific violations alleged herein and there are no representations,

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

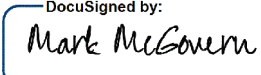
warranties, covenants, terms, or conditions agreed upon between the Parties other than those expressed in this Consent Agreement and Final Order.

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

For Respondent: TurboXS

Date: 9/29/2026 _____

By:  _____
9D98D9FB5C9D43F...
Mark McGovern
Owner

In the Matter of: TurboXS

EPA Docket No. CAA-03-2026-0268

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Division Director of the Enforcement & Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or the Regional Administrator's designee, the Regional Judicial Officer, issue the attached Final Order.

By: **ANDREA BAIN** Digitally signed by ANDREA BAIN
Date: 2026.09.30
13:08:40 -04'00'
[Digital Signature and Date]
 Andrea Bain, Acting Division Director
 Enforcement & Compliance Assurance Division
 U.S. EPA – Region 3
 Complainant

Attorney for Complainant:

By: **JOHN RUTHERFORD** Digitally signed by JOHN RUTHERFORD
Date: 2026.09.30
08:50:53 -04'00'
[Digital Signature and Date]
 John Rutherford
 Assistant Regional Counsel
 U.S. EPA – Region 3

FILED

Sep 30, 2026

3:18 pm

**U.S. EPA REGION 3
HEARING CLERK**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103**

In the Matter of:

:
:
:
:
:
:
:
:

**TurboXS
1007 Tippetts Lane
New Windsor, Maryland 21776**

**U.S. EPA Docket No. CAA-03-2026-0268
Proceeding under Section 205(c)(1) of the Clean
Air Act, 42 U.S.C. § 7524(c)(1)**

Respondent.

FINAL ORDER

Pursuant to 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, with specific reference to Sections 22.18(b)(2) and (3), the Consent Agreement resolving this matter is hereby ratified and incorporated by reference into this Final Order.

The Respondent is hereby **ORDERED** to comply with all of the terms of the Consent Agreement.

The effective date of the foregoing Consent Agreement and this Final Order is the date on which this Final Order is filed with the Regional Hearing Clerk.

By:

**JEFFREY
NAST**

Digitally signed by
JEFFREY NAST
Date: 2026.09.30
15:11:24 -04'00'

Regional Judicial and Presiding Officer
U.S. EPA Region 3

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103**

In the Matter of:	:
	:
TurboXS	: U.S. EPA Docket No. CAA-03-2026-0268
1007 Tibbetts Lane	:
New Windsor, Maryland 21776	: Proceeding under Section 205(c)(1) of the Clean
	: Air Act, 42 U.S.C. § 7524(c)(1)
Respondent.	:
	:

CERTIFICATE OF SERVICE

I certify that the foregoing ***Consent Agreement and Final Order*** was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the ***Consent Agreement and Final Order***. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Mark McGovern, Owner
TurboXS
Mark@turboxs.com
1007 Tibbetts Lane
New Windsor, Maryland 21776

Stewart Cables, Esq.
Hassan + Cables
Stewart@hassancables.com
1035 Pearl Street, Suite 200
Boulder, CO 80302

John Rutherford, Esq.
Assistant Regional Counsel
U.S. EPA, Region 3
Rutherford.john@epa.gov

Parmatma Adhikari
Enforcement Officer
U.S. EPA, Region 3
Adhikari.Parmatma@epa.gov

**BEVIN
ESPOSITO**

Digitally signed by BEVIN ESPOSITO
Date: 2026.09.30 15:19:44 -0400

[Digital Signature and Date]

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 3

Appendix A

Enclosure

TurboXS Sales of Defeat Devices from October 2020 through March 2024

Serial Number	Parts Number	Number of EGR Delete Sold	Number of Exhaust Aftertreatment Delete Hardware (e.g., straight pipes) Sold	Miscellaneous
1	W15-EGR	3		
2	350Z-RP		1	
3	A90-DP		4	
4	CSST-DP		63	
5	EVOX-RP		2	
6	GC13-FP		224	
7	GC13-RP		218	
8	GEN-FP		125	
9	GEN-RP		127	
10	HC15T-DP		12	
11	MS3-DP		45	
12	MS3-RP		20	
13	RX8-RP		28	
14	W15-FP		11	
15	W15-FP-1		12	
16	WS-CBAP		44	
17	WS-DP-V2		2	
19	WS-UPEG		410	
20	WS02-DP		74	
21	WS08-DP		28	
22	WS08-RP-V2		2	
23	GC13-SBE-RP		56	
24	GEN-SBE-RP		55	
25	MS3-SBE-RP		2	
28	WS02-RP		1	
45	W15-TGA			50