

Enclosure 2

**Enclosure 2
Expedited Settlement Alleged Violations and Final Adjusted Penalty Summary**

Table 1 - Inspection Information	
Inspection Date(s):	Docket Number:
June 26, 2024	CAA-10-2026-0033
Inspection Location Name:	Entry Number(s):
Mercer Burien	101-87017256
Address:	Date of Entry Detention by CBP:
1201 South 140 th Street, STE 140	June 24, 2024
City:	Inspector(s) Name(s):
Burien	Elfego & Prendergast (EPA)
State: Zip Code:	EPA Approving Official:
WA 98168	Edward J. Kowalski
Importer Name (Respondent):	EPA Enforcement Contact:
A&N Trading Co LLC	Alexander Liebert

Table 2 - Description of Violations and Vehicles/Equipment				
<p>A &N Trading Co LLC (“Respondent”) imported the engine(s) described at the bottom of Table 2 (the “Subject Engines”) on or about 6/26/2024. Authorized federal inspectors examined the Subject Engines. EPA reviewed the information provided by the importer and information collected by CBP Officers indicating that the Vehicles Emission Control Labels applied to the engines were not legitimate labels applied by the engine manufacturer and that the engines were not certified. EPA has found no further evidence indicating the Subject Engines are exempt or otherwise excluded from coverage under Title II the Clean Air Act (CAA) and its implementing regulations. Accordingly, by importing the Subject Engines, Respondent has committed 5 violation(s) of CAA Section 203(a)(1) and 213(d), 42 U.S.C. §§ 7522(a)(1) and 7547(d), and the regulations codified at 40 C.F.R. § 1068.101(a)(1) and (b)(5).</p>				
Vehicle/Equipment Description	Observed Engine Manufacturer	Observed Model Year	Observed Engine Family	Quantity
Used Excavators	Kubota	2010, 2011, 2013	False Labels	5