



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**UPS OVERNIGHT**

Dominick P. Zarcone  
President and CEO  
Keystone Automotive Operations, Inc.  
44 Tunkhannock Ave  
Exeter, PA 18643-1221

Re: Clean Air Act Complaint and Notice of Opportunity for Hearing  
EPA Docket No. CAA-03-2021-0058

Dear Mr. Zarcone:

Enclosed please find a copy of the Complaint and Notice of Opportunity for Hearing (“Complaint”) filed today with the Regional Hearing Clerk concerning alleged violations by Keystone Automotive Operations, Inc. (“Keystone”) of the Clean Air Act (“CAA”), 42 U.S.C. §§ 7401 *et seq.* The Complaint is based on alleged violations of Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), in connection with Keystone’s sale of automotive parts that have a principal effect of bypassing, defeating, or rendering inoperative altering emissionsrelated elements of design on EPA certified motor vehicles or motor vehicle engines. The Complaint and Notice of Opportunity for Hearing should be read and analyzed carefully to determine the alternatives available to Keystone in responding to the alleged violations.

An Answer to this Complaint must be filed within thirty (30) days of its receipt. The Answer must specifically respond to each of the allegations in the Complaint. Failure to respond to the Complaint and Notice by specific Answer within thirty (30) days of receipt will constitute an admission of the allegations made in the Complaint. Failure to answer may also result in the filing of a Motion for a Default Order and the possible issuance of a Default Order without further proceedings.

Keystone may choose to request a hearing to contest any matter set forth in the Complaint. Such request must be included in the Answer to this Complaint. Whether or not a hearing is requested, Keystone may request an informal settlement conference to discuss resolution of this case. The attorney assigned to this case is Jennifer M. Abramson, Senior Assistant Regional Counsel. Keystone may have its counsel contact Ms. Abramson on its behalf at:

Jennifer M. Abramson (3RC30)  
Senior Assistant Regional Counsel  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Re: Clean Air Act Complaint and Notice of Opportunity for Hearing  
EPA Docket No. CAA-03-2021-0058

Ms. Abramson can be reached by telephone at (215) 814-2066, or by email at [abramson.jennifer@epa.gov](mailto:abramson.jennifer@epa.gov).

Sincerely,

Karen Melvin, Director  
Enforcement and Compliance Assurance Division

Enclosures

cc: Jennifer P. Adams, Hogan Lovells US LLP  
Adam M. Kushner, Hogan Lovells US LLP  
Jennifer M. Abramson, EPA  
Amelie Isin, EPA