

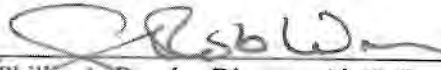
Enclosure  
CLEAN AIR ACT MOBILE SOURCE EXPEDITED SETTLEMENT AGREEMENT

DOCKET NO. CAA-14-8131

Respondent: Vantage Vehicle International, Inc.  
1740 N. Delilah Street  
Corona, CA 92879

1. The parties enter into this Clean Air Act Mobile Source Expedited Settlement Agreement (Agreement) in order to settle the civil violations discovered as a result of the inspection specified in Table 1, attached, and incorporated into this Agreement by reference. The civil violations that are the subject of this Agreement are described in Table 2, attached, and incorporated into the Agreement by reference, regarding the vehicles/engines specified therein.
2. Respondent admits to being subject to the Clean Air Act (CAA) and its associated regulations and that the United State Environmental Protection Agency (EPA) has jurisdiction over the Respondent and the Respondent's conduct described in Table 2. Respondent does not contest the findings detailed therein, and waives any objections Respondent may have to EPA's jurisdiction.
3. Respondent consents to the payment of a penalty in the amount of \$7,600 further described in Table 3, attached, and incorporated into this Agreement by reference. Respondent agrees to follow the instructions in "CAA Mobile Source Expedited Settlement Agreement Instructions," attached, and incorporated into this Agreement by reference. Respondent certifies that the required remediation, detailed in Table 3, has been carried out.
4. By its first signature below, EPA approves the findings resulting from the inspection and alleged violations set forth in Table 1 and Table 2. Upon signing and returning this Agreement to the EPA, Respondent consents to the terms of this Agreement without further notice. Respondent acknowledges that this Agreement is binding on the parties signing below, and becomes effective on the date of the EPA Air Enforcement Division Director's ratifying signature.

APPROVED BY EPA:

  
for Phillip A. Brooks, Director, Air Enforcement Division

Date: 7/25/2014

APPROVED BY RESPONDENT:

Name (print): MICHAEL PAK

Title (print): PRESIDENT / CEO

Signature: 

Date: 7/21/2014

RATIFIED BY EPA:

  
for Phillip A. Brooks, Director, Air Enforcement Division

Date: 8/14/14

**Table 1 - Inspection Information**

<b>Entry/Inspection Date(s):</b>		<b>Docket Number:</b>	
June 20, 2014		C A A - 1 4 - 8 1 3 1	
<b>Inspection Location:</b>		<b>Entry/Inspection Number(s)</b>	
Dominguez MET Facility		B V Q - 0 1 1 4 8 3 2 - 8	
<b>Address:</b>		<b>Inspector(s) Name(s):</b>	
2711 E. Dominguez Street		Debbie Lowe Liang, Tony Miller, Ross Ruske, Matt Salazar	
<b>City:</b>		<b>EPA Approving Official:</b>	
Long Beach		Phillip A. Brooks	
<b>State:</b>	<b>Zip Code:</b>	<b>EPA Enforcement Contact:</b>	
CA	90810	Janice Chan (R9), 415-972-3308	
<b>Respondent:</b>			
Vantage Vehicle International, Inc.			

**Table 2 - Description of Violation and Vehicles/Engines**

The nonroad vehicles described below (Subject Vehicles) were found to be powered by uncertified nonroad spark-ignition engines in violation of Title II of the Clean Air Act (CAA). Sampled catalysts taken from two of the Subject Vehicles during the June 20, 2014 inspection were found to be materially different from the catalysts specified in the application for the Certificate of Conformity (AFC and COC respectively). Vantage Vehicle International, Inc. (Vantage) provided information that demonstrates the catalyst described in the AFC has materially different substrate material, dimensions, and precious metal loading than the catalyst found during the inspection. These differences likely affect emissions. Vantage further demonstrated that the engine tested for certification likely contained a catalyst with the same part number and specifications as the sampled catalysts. Despite the fact that the tested engine likely has the same catalyst as the Subject Vehicles, the EPA concludes that the COC does not cover the engines in the Subject Vehicles because a COC covers only engines that are materially the same as those described in the AFC. Therefore, the engines in the Subject Vehicles are not covered by a valid COC, and are not otherwise excluded from coverage. CAA § 203(a)(1), 42 U.S.C. § 7522(a)(1), prohibits the import of nonroad engines or equipment unless they are covered by a valid EPA COC or are properly excluded. Vantage committed 21 violations of CAA § 203(a)(1), 42 U.S.C. § 7522(a)(1) by importing the Subject Vehicles.

Subject Vehicles	Engine Family	Manufacturer	Model Year	Quantity
Nonroad Vehicles	EVVGS.995VG4	Vantage Vehicle International, Inc.	2014	21

**Table 3 - Penalty and Required Remediation**

Penalty	\$7,600
Required Remediation	Vantage Vehicle International, Inc. must provide the EPA with a report and documentation of an amendment to its AFC for Engine Family EVVGS.995VG4 correcting the catalyst description.