

**Enclosure**  
**CLEAN AIR ACT MOBILE SOURCE EXPEDITED SETTLEMENT AGREEMENT**

DOCKET NO. CAA-16-8282

Respondent: IronDirect LLC  
Biltmore Park Town Square  
2 Town Square Blvd., Suite 260  
Asheville, NC 28803

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, incorporated into this Agreement by reference. The civil violations that are the subject of this Agreement are described in Table 2, attached, 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 States 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 the EPA's jurisdiction.
3. Respondent consents to the payment of a penalty in the amount of \$15,000, further described in Table 3, attached, incorporated into this Agreement by reference. Respondent agrees to follow the instructions in "CAA Mobile Source Expedited Settlement Agreement Instructions," attached, 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, the 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:



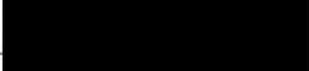
Date: May 3, 2016

for Phillip A. Brooks, Director, Air Enforcement Division

APPROVED BY RESPONDENT:

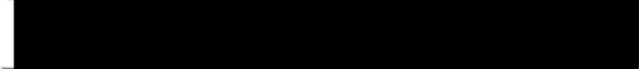
Name (print): 

Title (print): VP, Parts & Logistics

Signature: 

Date: May 9, 2016

RATIFIED BY EPA:



Date: June 2, 2016

for Phillip A. Brooks, Director, Air Enforcement Division

**Table 1 - Inspection Information**

<b>Inspection Date(s):</b>		<b>Docket Number:</b>	
March 28, 2016		C A A - 1 6 - 8 2 8 2	
<b>Inspection Location:</b>		<b>Entry/Inspection Number(s)</b>	
Dundalk Marine Terminal		T 5 0 0 1 4 1 7 9 9 3	
<b>Address:</b>		T 5 0 0 1 4 1 7 9 8 5	
2700 Broenig Highway			
<b>City:</b>		<b>Inspector(s) Name(s):</b>	
Baltimore		CBPO Dametrika Williams	
<b>State:</b>	<b>Zip Code:</b>	<b>EPA Approving Official:</b>	
MD	21222	Phillip A. Brooks	
<b>Respondent:</b>		<b>EPA Enforcement Contact:</b>	
IronDirect LLC		Amelie Isin, (215) 814-2160	

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

The equipment described below (Subject Bulldozers) is neither covered by an EPA-issued certificate of conformity, nor is it exempt from the certification requirements under the Clean Air Act. Therefore, IronDirect LLC violated CAA § 203(a)(1), 42 U.S.C. § 7522(a)(1), and 40 C.F.R. § 1068.101(a)(1) by importing the Subject Bulldozers into the United States. IronDirect LLC obtained a testing exemption from EPA under 40 C.F.R. § 1068.325(b), however the equipment was not accordingly labeled and in some cases the exemption was not obtained prior to importation.

Equipment Description	Equipment Manufacturer	Model	Unit Numbers	Equipment Model Year	Engine Serial Number	Quantity
Bulldozers	Shandong Shantui Construction Machinery Import & Export Co. Ltd.	SD16	CHSD16AACG3037880 CHSD16AAEG3037781 CHSD16AAKG3037883	2016	73339588 73339583 73339618	3
		SD32	CHSD32AWJG1005818 CHSD32AWTG1005801 CHSD32AWJG1005821		41228967 41228928 41229199	3

**Table 3 - Penalty and Required Remediation**

Penalty	\$15,000
Required Remediation	IronDirect must within 10 days of obtaining access to the subject bulldozers: (i) apply required labeling to each of the subject bulldozers consistent with 40 C.F.R. § 1068.325(b); (ii) send to <a href="mailto:amelie.isin@epa.gov">amelie.isin@epa.gov</a> a picture of each label as applied, (iii) send to <a href="mailto:amelie.isin@epa.gov">amelie.isin@epa.gov</a> a statement from a corporate official certifying that each bulldozer was labeled as required by 40 C.F.R. § 1068.325(b), committing to using the bulldozers only as allowed under that exemption, and committing to exporting the bulldozers by May 1, 2017. Pursuant to section 208 of the Clean Air Act, 42 U.S.C. § 7542, IronDirect is hereby required to provide <a href="mailto:amelie.isin@epa.gov">amelie.isin@epa.gov</a> by no later than May 15, 2017, documentation proving that the six subject bulldozers were exported.