

Enclosure
CLEAN AIR ACT MOBILE SOURCE EXPEDITED SETTLEMENT AGREEMENT

DOCKET NO. CAA-16-8264

Respondent: Ridgerock Tools, Inc.
15225 S. San Pedro Street
Gardena, CA 90248

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 **\$2,100**, 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: Jan. 7, 2015

for _____
Phillip A. Brooks, Director, Air Enforcement Division

APPROVED BY RESPONDENT:

Name (print): GORDON HSU

Title (print): GENERAL MANAGER

Signature: _____

Date: Jan 19, 2016

RATIFIED BY EPA:

Date: Feb. 5, 2016

for _____
Phillip A. Brooks, Director, Air Enforcement Division

Table 1 - Inspection Information

Entry/Inspection Date(s):		Docket Number:	
March 23, 2015 / April 10, 2015		C A A - 1 6 - 8 2 6 4	
Inspection Location:		Entry/Inspection Number(s)	
MET Price		W 6 9 - 3 3 8 1 8 1 7 - 2	
Address:			
2751 Dominguez Street		2 0 1 5 0 4 1 0 0 8 3 0 0 1	
City:		Inspector(s) Name(s):	
Long Beach		CBPO Rene Arreygue, Janice Chan, and Allison Watanabe	
State:	Zip Code:	EPA Approving Official:	
CA	90810	Phillip A. Brook	
Respondent:		EPA Enforcement Contact:	
Ridgerock Tools, Inc.		Andrew Zellinger (Region 9), (415) 972-3093	

Table 2 - Description of Violation and Vehicles/Engines

The 100 portable generators with gasoline engines described below (the Subject Equipment) were found to be uncertified with respect to small, spark-ignition engines and equipment standards under Title II of the Clean Air Act (CAA). A sampled catalyst taken from one of the Subject Equipment during the April 10, 2015 inspection was found to be materially different from the catalyst design specified in the Certificate Summary Information Report for the Certification of Conformity (CSI Report and COC, respectively) for claimed engine family EYAMS.1961ST. Specifically, testing and analysis of the substrate volume and precious metal (PM) content of the sampled catalyst revealed that it is materially different from the certified design. Because a COC covers only equipment that are materially the same (including catalyst design, a key factor in emissions control) as those described in the CSI Report, the Subject Equipment are not covered by a valid COC. The EPA has found no evidence that the Subject Equipment are otherwise excluded from coverage. CAA § 203(a)(1), 42 U.S.C. § 7522(a)(1), prohibits the importation or introduction into U.S. commerce of new recreational vehicles or recreational vehicle engines unless they are covered by a valid COC or are properly excluded. By importing the Subject Equipment and introducing them into U.S. commerce, Ridgerock committed 100 violations of CAA §§ 203(a)(1) and 213(d), 42 U.S.C. §§ 7522(a)(1) and 7547(d), and 40 C.F.R. §§ 1068.101(a)(1) and (b)(5).

Equipment Description	Claimed Engine Manufacturer	Model Year	Claimed Engine Family	Quantity
Portable Generator with Gasoline Engine	Yongkang Apollo Motive Force Industrial Co. Ltd.	2014	EYAMS.1961ST	100

Table 3 - Penalty and Required Remediation

Penalty	\$2,100
Required Remediation	Ridgerock must export the 100 uncertified Subject Equipment to a country other than Canada or Mexico, and provide the EPA with a report documenting such exportation.