



ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In re Meraki Group LLC )
)
) Docket No. CAA-2026-8729
)
)
)

FINAL ORDER

February 20, 2026

Before Environmental Appeals Judges Aaron P. Avila and Ammie Roseman-Orr.

Order of the Board by Judge Roseman-Orr:

Pursuant to 40 C.F.R. § 22.18(b)-(c) of the EPA's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22, the attached Expedited Settlement Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified.

The Respondent is ORDERED to comply with all terms of the Expedited Settlement Agreement, effective immediately.

So ordered.

**ENCLOSURE 1**

**EXPEDITED SETTLEMENT AGREEMENT**

**ENVIRONMENTAL APPEALS BOARD**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**

|                  |   |                          |
|------------------|---|--------------------------|
| In re:           | ) |                          |
|                  | ) |                          |
| Meraki Group LLC | ) | Docket No. CAA-2026-8729 |
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**EXPEDITED SETTLEMENT AGREEMENT**

**A. JURISDICTION**

1. This is an expedited administrative penalty assessment proceeding brought for alleged violations of the American Innovation in Manufacturing Act of 2020 (“AIM Act”), 42 U.S.C. § 7675, which governs the import of hydrofluorocarbons (“HFCs”), under Section 113(d) of the Clean Air Act (“CAA”), 42 U.S.C. § 7413(d), which authorizes the United States Environmental Protection Agency (“EPA”) to bring administrative civil enforcement actions.
2. This expedited settlement agreement (“Agreement”) is entered into under Section 113(d) of the CAA, 42 U.S.C. § 7413(d), and the Consolidated Rules of Practice Governing the Administrative Assessment of Penalties and the Revocation/Termination or Suspension of Permits, 40 C.F.R. Part 22.
3. Complainant is the United States Environmental Protection Agency. On the EPA’s behalf, Acting Director Sparsh S. Khandeshi, Air Enforcement Division, is delegated the authority to settle civil administrative penalty proceedings under Section 113(d) of the CAA.
4. Respondent is Meraki Group LLC (“Meraki”) and is a “person” as defined below and identified further in Table 1 of the Expedited Settlement Agreement (“ESA”) Attachment 1.
5. Complainant and Respondent (together, the “Parties”), having agreed that settlement of this action is in their mutual interest, consent to the issuance of the attached final order (“Final Order” or “Order”) ratifying this Agreement before taking testimony and without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this Agreement and Final Order. Furthermore, Complainant has determined, and Respondent does not dispute, that settlement of this action is in the public interest.

6. The EPA and the United States Department of Justice jointly determined that this matter, although it involves alleged violations that occurred more than one year before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d).
7. The Environmental Appeals Board is authorized to ratify this Agreement, which memorializes a settlement between Complainant and Respondent. 40 C.F.R. §§ 22.4(a)(1) and 22.18(b).
8. The ratification of the Final Order, incorporating this Agreement, simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

## **B. GOVERNING LAW**

9. This proceeding arises under the AIM Act, 42 U.S.C. § 7675, and Section 113 of the CAA, 42 U.S.C. § 7413, and the regulations promulgated thereunder, which impose limits on HFC production and consumption.
10. The EPA is authorized to enforce the AIM Act and any regulation promulgated thereunder utilizing the federal enforcement authorities established by Section 113 of the CAA, 42 U.S.C. § 7675(k)(1)(C). Section 113 of the CAA authorizes the Administrator of the EPA to assess a civil administrative penalty of not more than \$25,000 per day of violation. 42 U.S.C. §113(a)(3)(A), (d)(1). Pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, Pub. L. 101-410, as amended, and its implementing regulation, the Civil Monetary Penalty Inflation Adjustment Rule, codified at 40 C.F.R. Part 19, the statutory maximum civil administrative penalty has subsequently been raised to \$59,114 per day of violation. 40 C.F.R. § 19.4, Table 1.
11. The EPA regulations at 40 C.F.R. Part 84, Subpart A, implement the AIM Act requirement to phase down HFC production and consumption.<sup>1</sup>
12. The regulations at 40 C.F.R. Part 84, Subpart A, apply to any person who imports a regulated substance. 40 C.F.R. § 84.1(b).
13. The regulations at 40 C.F.R. § 84.5(b)(1) state that “[n]o person may import bulk regulated substances, either as a single component or a multicomponent substance, except . . . [i]f the importer of record possesses at the time they are required to submit reports to EPA pursuant to § 84.31(c)(7), and expends at the time of ship berthing for vessel arrivals, border crossing for land arrivals such as trucks, rails, and autos, and first point of terminus in U.S. jurisdiction for arrivals via air, consumption or application-specific allowances in a quantity equal to the exchange-value weighted equivalent of the regulated substances imported, whether present as a single component or a multicomponent blend.”

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<sup>1</sup> The regulations at 40 C.F.R. Part 84, Subpart A were amended on September 18, 2023. If a version of the regulations was different in 2022 from the current version of the regulations, it is cited as “2022” in this Agreement.

14. Pursuant to 40 C.F.R. § 84.31(a), “any person who ... imports, ... regulated substances” must comply with specified reporting requirements.
15. The regulations at 40 C.F.R. § 84.31(c)(7) provide that the importer of record of imported regulated substances must submit an advance notification report for each shipment of regulated substances imported no later than 10 days prior to the date of importation if arriving by marine vessel and no later than 5 days if arriving by non-marine vessel.
16. The regulations at 40 C.F.R. § 84.31(c)(7) (2022)<sup>2</sup> provided that a person importing a regulated substance, or their agent, was required to submit an advance notification report for each shipment of regulated substances imported no later than 14 days before importation.
17. The definitions, listed at 40 C.F.R. Part 84, Subpart A, include:
  - a) An “allowance” is defined as a “limited authorization for the production or consumption of a regulated substance established under subsection (e) of Section 103 in Division S, Innovation for the Environment, of the Consolidated Appropriations Act, 2021 (Pub. L. 116-260) (the AIM Act). An allowance allocated under subsection (e) of Section 103 in Division S of the AIM Act does not constitute a property right.” 40 C.F.R. § 84.3.
  - b) “Bulk” is defined as “a regulated substance of any amount that is in a container for the transportation or storage of that substance such as cylinders, drums, ISO tanks, and small cans. A regulated substance that must first be transferred from a container to another container, vessel, or piece of equipment in order to realize its intended use is a bulk substance. A regulated substance contained in a manufactured product such as an appliance, an aerosol can, or a foam is not a bulk substance.” 40 C.F.R. § 84.3.
  - c) “Consumption allowances” are “a limited authorization to produce and import regulated substances; however, consumption allowances may be used to produce regulated substances only in conjunction with production allowances.” 40 C.F.R. § 84.3.
  - d) “Exchange value” is defined as the “value assigned to a regulated substance in accordance with AIM Act subsections (c) and (e), as applicable, and as provided in Appendix A to 40 C.F.R. Part 84.” 40 C.F.R. § 84.3.
  - e) “Exchange value equivalent” is defined as “the exchange value-weighted amount of a regulated substance obtained by multiplying the mass of a regulated substance by the exchange value of that substance.” 40 C.F.R. § 84.3.
  - f) “Import” is defined as “to land on, bring into, or introduce into, or attempt to land on, bring into, or introduce into, any place subject to the jurisdiction of the United States, regardless of whether that landing, bringing, or introduction constitutes an importation within the meaning of the customs laws of the United States. Offloading used regulated

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<sup>2</sup> 40 C.F.R. § 84.31(c)(7) (and other sections) has since been modified, effective September 18, 2023 (*See* 88 Fed. Reg. 46,836, 46,897 (July 20, 2023)); *see also* footnote 1, *supra*.

substances recovered from equipment aboard a marine vessel, aircraft, or other aerospace vehicle during servicing is not considered an import.” 40 C.F.R. § 84.3.

- g) “Importer” is defined as “any person who imports a regulated substance into the United States. ‘Importer’ includes the person primarily liable for the payment of any duties on the merchandise or an authorized agent acting on his or her behalf. The term also includes: (1) [t]he consignee; (2) [t]he importer of record; (3) [t]he actual owner; or (4) [t]he transferee, if the right to draw merchandise in a bonded warehouse has been transferred.” 40 C.F.R. § 84.3.
- h) “Person” is defined as “any individual or legal entity, including an individual, corporation, partnership, association; state, municipality, political subdivision of a state, Indian tribe; any agency, department, or instrumentality of the United States; and any officer, agent, or employee thereof.” 40 C.F.R. § 84.3.
- i) “Regulated substance” is defined as “a hydrofluorocarbon listed in the table contained in subsection (c)(1) of the AIM Act and a substance included as a regulated substance by the Administrator under the authority granted in subsection (c)(3).” 40 C.F.R. § 84.3.

18. A current list of regulated substances, their chemical formulas, and their exchange values can be found in Appendix A to 40 C.F.R. Part 84. *See* 40 C.F.R. § 84.3.

19. The regulated substances at issue in this matter are assigned the following exchange values:

| HFC    | Chemical Formula or Blends            | Exchange Value |
|--------|---------------------------------------|----------------|
| R-410A | 50% HFC-125, 50% HFC-32               | 2,087.5        |
| R-407C | 52% HFC-134a, 25% HFC-125, 23% HFC-32 | 1,773.9        |

40 C.F.R. Part 84, Appendix A.

### C. ALLEGED VIOLATIONS OF LAW

20. The EPA alleges that Meraki violated 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7) (2022) by failing to timely submit advance notification reports for the shipments of regulated substances identified in Tables 1a and 1b of ESA Attachment 1 by the day specified by 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7) (2022).

### D. TERMS OF AGREEMENT

21. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:

- a. admits that the EPA has jurisdiction over the subject matter alleged in this Agreement;
- b. admits the facts stipulated in Table 1 of ESA Attachment 1;

- c. consents to the assessment of a civil penalty as stated in Table 3 of ESA Attachment 1 and below;
  - d. waives any right to contest the alleged violations of law set forth in Section C of this Agreement; and
  - e. waives its right to appeal the Final Order accompanying this Agreement.
22. By signing this Agreement, respondent waives any rights or defenses that respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the final order accompanying the expedited settlement agreement.
23. For the purpose of this proceeding, Respondent:
- a. agrees that this Agreement states a claim upon which relief may be granted against Respondent;
  - b. acknowledges that this Agreement constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions related to the Respondent;
  - c. certifies that it completed the corrective action as set forth in Table 4 of ESA Attachment 1;
  - d. waives its right to request a hearing, any right to contest the allegations in this Expedited Settlement Agreement and Final Order and its right to appeal this Expedited Settlement Agreement and Final Order;
  - e. consents to personal jurisdiction in any action to enforce this Agreement or Final Order, or both, in an appropriate United States District Court; and
  - f. waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in an appropriate United States District Court to compel compliance with the Agreement or Final Order, or both, and to seek an additional penalty for noncompliance with the Agreement or Final Order and agrees that federal law shall govern in any such civil action.

#### **E. TERMS OF PAYMENT**

24. Respondent agrees to pay a civil penalty in the amount of \$9,000 ("Assessed Penalty"), which is stated in Table 3 of ESA Attachment 1, within thirty (30) calendar days after the date the Final Order ratifying this Agreement is filed with the Clerk of the Environmental Appeals Board ("Filing Date"). Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.
25. When making a payment, Respondent shall:
- a. Identify every payment with Respondent's name and the docket number of this Agreement, CAA-2026-8729,

- b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve proof of such payment (electronic correspondence is preferred) to the following person(s):

Tommie Madison, Clerk of the Environmental Appeals Board  
U.S. Environmental Protection Agency, Headquarters  
1200 Pennsylvania Avenue, NW  
Mail Code 1103M  
Washington, DC 20460-0001  
[Clerk\\_EAB@epa.gov](mailto:Clerk_EAB@epa.gov)

Ethan Thompson, Attorney Advisor  
U.S. Environmental Protection Agency, Headquarters  
2.2226 J, William Jefferson Clinton Building South  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
Mail Code 2242A  
[thompson.ethan@epa.gov](mailto:thompson.ethan@epa.gov)

U.S. Environmental Protection Agency  
Cincinnati Finance Center  
Via electronic mail to:  
[CINWD\\_AcctsReceivable@epa.gov](mailto:CINWD_AcctsReceivable@epa.gov)

“Proof of payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent’s name.

26. Interest, Charges, and Penalties on Late Payments. Pursuant to 42 U.S.C. § 7413(d)(5), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the Assessed Penalty per this Agreement, the entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately due and owing, and the EPA is authorized to recover the following amounts.

- a. Interest. Interest begins to accrue from the Filing Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. Per 42 U.S.C. § 7524(c)(6), interest will be assessed pursuant to 26 U.S.C. § 6621(a)(2), that is the IRS standard underpayment rate, equal to the Federal short-term rate plus 3 percentage points.

- b. Handling Charges. The United States' enforcement expenses including, but not limited to, attorneys' fees and costs of handling collection.
  - c. Late Payment Penalty. A ten percent (10%) quarterly non-payment penalty.
27. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty per this Agreement, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following.
- a. Refer the debt to a credit reporting agency or a collection agency, pursuant to 40 C.F.R. §§ 13.13 and 13.14.
  - b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, pursuant to 40 C.F.R. Part 13, Subparts C and H.
  - c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, pursuant to 40 C.F.R. § 13.17.
  - d. Request that the Attorney General bring a civil action in the appropriate district court to enforce the Final Order and recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, pursuant to 42 U.S.C. § 7413(d)(5). In any such action, the validity, amount, and appropriateness of the Assessed Penalty and Final Order shall not be subject to review.
28. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.
29. Tax Treatment of Penalties. Pursuant to 26 U.S.C. § 162(f), penalties, interest, and other charges paid pursuant to this Agreement shall not be deductible for purposes of federal taxes.
30. By signing this Agreement, Respondent certifies that the information it has supplied concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.
31. By signing this Agreement, Respondent acknowledges that this Agreement and Order, including identifying information such as name, federal tax ID number, mailing and e-mail

address, will be available to the public when the Agreement and Certificate of Service are filed and uploaded to a searchable database and agrees that this Agreement does not contain any confidential business information or other personally identifiable information.

32. By signing this Agreement, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that they are fully authorized to execute and enter into the terms and conditions of this Agreement and has the legal capacity to bind the party they represent to this Agreement.
33. By signing this Agreement, Respondent agrees to acceptance of the Complainant's: (a) digital or an original signature on this Agreement; and (b) service of the fully executed Agreement on the Respondent by mail or by e-mail. Respondent understands that the mailing or e-mail address may be made public when the Agreement and Certificate of Service are filed and uploaded to a searchable database. Complainant agrees to acceptance of the Respondent's digital or an original signature on this Agreement.
34. Each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

#### **F. EFFECT OF AGREEMENT AND ATTACHED FINAL ORDER**

35. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this Agreement and Final Order resolves only Respondent's liability for federal civil penalties for the violation(s) identified in Section C of this Agreement.
36. This Agreement constitutes the entire agreement and understanding of the Parties and supersedes any prior agreements or understandings among the Parties with respect to the subject matter hereof.
37. The terms, conditions, and compliance requirements of this Agreement may not be modified or amended after it is ratified except upon the written agreement of both parties, and approval of the Environmental Appeals Board.
38. Any violation of this Agreement or Order may result in a civil judicial action for an injunction, or civil penalties of up to \$124,426 per day per violation (with each kilogram a separate violation), or both, as provided in Section 113(b)(2) of the Act, 42 U.S.C. § 7413(b)(2), as well as criminal sanctions as provided in Section 113(c) of the Act, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Agreement in an administrative, civil judicial, or criminal action.
39. Nothing in this Agreement shall relieve Respondent of the duty to comply with all applicable provisions of the Act and other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.

40. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.
41. The EPA reserves the right to revoke this Agreement and settlement penalty if and to the extent that the EPA finds, after signing this Agreement, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to the EPA, and the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein. The EPA shall give Respondent notice of its intent to revoke, which shall not be effective until received by Respondent.
42. Respondent and Complainant agree to the Environmental Appeals Board issuance of the attached Final Order ratifying the Agreement.

The foregoing Agreement *In the Matter of Meraki Group LLC*, Docket No. CAA-2026-8729 is Hereby Stipulated, Agreed, and Approved.

COMPLAINANT:

**SPARSH**  
**KHANDESHI**

Digitally signed by  
SPARSH KHANDESHI  
Date: 2026.02.13  
17:07:46 -05'00'

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Signature

Sparsh S. Khandeshi, Acting Director  
Air Enforcement Division  
Office of Civil Enforcement  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency

The foregoing Agreement *In the Matter of Meraki Group LLC*, Docket No. CAA-2026-8729, is Hereby Stipulated, Agreed, and Approved.

FOR RESPONDENT:



02/09/2026

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Printed Name: ZHANPENG Ma

Title: Managing Partner

Address: 5462 82nd St. Elmhurst, NY 11373

Federal Tax Identification Number: 81-1841228

**EXPEDITED SETTLEMENT AGREEMENT ATTACHMENT 1**

**AMERICAN INNOVATION AND MANUFACTURING ACT  
OFFSITE COMPLIANCE MONITORING ACTIVITY FACTS, ALLEGED  
VIOLATIONS, PENALTY, AND CORRECTIVE ACTION FORM**

| <b>Table 1a – Offsite Compliance Monitoring Activity or Inspection Stipulated Facts</b>                 |   |
|---|---|
| <b>Offsite Compliance Monitoring Activity</b><br><b>Date:</b> November 12, 2025                         | <b>Docket Number:</b> CAA-2026-8729   |
| <b>Person/Importer Name (“Respondent”):</b><br>Meraki Group LLC<br><b>Importer Number:</b> 81-184122800 | <b>Entry Information:</b> See below   |
| <b>Respondent Address:</b><br>5462 82 <sup>nd</sup> St.<br>Elmhurst, New York 11373                     | <b>Inspector Name:</b> Jessica Cordasco<br><b>Email Address:</b> <a href="mailto:cordasco.jessica@epa.gov">cordasco.jessica@epa.gov</a> |
| <b>Subject Regulated Substances:</b> See below  | <b>Arrival Dates:</b> See below   |

| <b>Table 1b – Summary of Regulated Substance Shipments</b>   |                      |                                     |   |                          |   |
|--|----------------------|-------------------------------------|---|--------------------------|---|
| <b>Entry Number</b>  | <b>HFC/HFC Blend</b> | <b>Importation Date<sup>1</sup></b> | <b>Advanced Notification Report Filing Date</b> | <b>Mode of Transport</b> | <b>Days Advance Notification Reports Late</b> |
| NIK01271893  | R-410A               | 10/26/2025                          | 10/24/2025                                      | Marine Vessel            | 8   |
| NIK01230618  | R-410A               | 08/14/2025                          | 08/07/2025                                      | Marine Vessel            | 3   |
| NIK01102015  | R-407C               | 11/20/2024                          | 11/18/2024                                      | Marine Vessel            | 8   |
| NIK01016306  | R-410A               | 06/24/2024                          | 06/20/2024                                      | Marine Vessel            | 6   |
| NIK00959407  | R-410A               | 04/02/2024                          | 04/02/2024                                      | Marine Vessel            | 10  |
| NIK00891535  | R-410A               | 11/30/2023                          | 11/27/2023                                      | Marine Vessel            | 7   |
| Change in Reporting Requirements. <i>See</i> 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7) (2022). |                      |                                     |   |                          |   |
| NIK00765713  | R-407C               | 05/11/2023                          | 05/02/2023                                      | Marine Vessel            | 5   |
| NIK00686810  | R-410A               | 11/19/2022                          | 11/18/2022                                      | Marine Vessel            | 13  |

<sup>1</sup> This is the "Arrival Date" per the Customs and Border Protection (“CBP”) Government Client Manifest Capability (“GCMC”) Entry Summary.

**Table 2 – Description of Alleged Violations**

The EPA alleges that:

- the importer of record failed to timely submit advance notification reports for the import of regulated substances in violation of 40 C.F.R. § 84.31(c)(7), for the shipments identified by the entry numbers listed in Tables 1a and 1b.

**Table 3 – Civil Penalty**

**Complainant and Respondent agree upon the following civil penalty for settlement purposes: \$9,000, where:**

Number of Violations \* Violation Type Penalty Amount = Penalty  
 7 \* \$1,000 (Late advance reporting) + 1 \* \$2,000 (Failure to provide any advance reporting<sup>2</sup>) = \$9,000

| Violation Type   | Total Penalty Amount |
|--|----------------------|
| Late advance reporting (40 C.F.R. § 84.31(c)(7))   | \$1,000              |
| Failure to provide any advance reporting (40 C.F.R. § 84.31(c)(7))                       | \$2,000              |
| Late quarterly reports (40 C.F.R. § 84.31(c)(1))   | \$2,500              |
| Incomplete or inaccurate quarterly reporting (40 C.F.R. § 84.31(c)(1))                   | \$3,000              |
| Failure to submit quarterly reports (40 C.F.R. § 84.31(c)(1))                            | \$3,500              |
| Late annual reports (40 C.F.R. § 84.33(a); 40 C.F.R. § 84.60(a))                         | \$10,000             |
| Incomplete or inaccurate annual reporting (40 C.F.R. § 84.33(a); 40 C.F.R. § 84.60(a))   | \$10,000             |
| Failure to submit annual reports (40 C.F.R. § 84.33(a); 40 C.F.R. § 84.60(a))            | \$15,000             |
| Failure to maintain records (40 C.F.R. § 98.3(g))  | \$5,000              |
| Late annual GHG reports (40 C.F.R. § 98.3(b))  | \$10,000             |
| Incomplete or inaccurate annual GHG reporting (40 C.F.R. § 98.3(b); 40 C.F.R. § 98.3(h)) | \$10,000             |
| Failure to submit annual GHG reports (40 C.F.R. § 98.3(b))                               | \$15,000             |

<sup>2</sup> Where an importer submits a report after the date of importation, the EPA considers the importer to have failed to submit an advance import report under 40 C.F.R. § 84.31(c)(7).

| <b>Table 3 – Civil Penalty</b>  |                              |              |           |
|---|------------------------------|--------------|-----------|
| <b>HFC EV<sup>3</sup></b>   | <b>Percentage Multiplier</b> | <b>HFC</b>   | <b>EV</b> |
| < 1,300   | 20%                          | HFC-152      | 53        |
| ≥ 1,300 ≤ 5,000   | 30%                          | HFC-41       | 92        |
| > 5,000 ≤ 10,000  | 40%                          | HFC-152a     | 124       |
| >10,000 ≤ 15,000  | 50%                          | HFC-143      | 353       |
|   |                              | HFC-32       | 675       |
|   |                              | HFC-245ca    | 693       |
|   |                              | HFC-365mfc   | 794       |
| <b>TT Product GWP<sup>4</sup></b>   | <b>Percentage Multiplier</b> | HFC-245fa    | 1,030     |
| < 1,300   | 20%                          | HFC-134      | 1,100     |
| ≥ 1,300 ≤ 5,000   | 30%                          | HFC-236cb    | 1,340     |
| > 5,000 ≤ 10,000  | 40%                          | HFC-236ea    | 1,370     |
| >10,000 ≤ 15,000  | 50%                          | HFC-134a     | 1,430     |
|   |                              | HFC-43-10mee | 1,640     |
|   |                              | HFC-227ea    | 3,220     |
| <b>ODS</b>  | <b>Percentage Multiplier</b> | HFC-125      | 3,500     |
| Any ODS listed as a class I or class II controlled substance in 40 C.F.R. Part 82, whether on its own or in a blend | 40%                          | HFC-143a     | 4,470     |
|   |                              | HFC-236fa    | 9,810     |
|   |                              | HFC-23       | 14,800    |

| <b>Table 4 – Corrective Action</b>                         |
|--|
| Respondent has completed and submitted all reports to EPA. |

<sup>3</sup> EVs are found in Appendix A of 40 C.F.R. Part 84.

<sup>4</sup> *Id.*

## **CERTIFICATE OF SERVICE**

I certify that copies of the foregoing “Expedited Settlement Agreement” and “Final Order” in the matter of Meraki Group LLC, Docket Number CAA-2026-8729, were sent to the following persons on February 20, 2026, in the manner indicated:

**By E-mail:**

Ethan Thompson, Attorney Advisor  
Air Enforcement Division  
[thompson.ethan@epa.gov](mailto:thompson.ethan@epa.gov)

Zhanpeng Ma, Managing Partner  
Meraki Group LLC  
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Tommie Madison  
Clerk of the Board