UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

MAR 27 2019

CERTIFIED MAIL NO. 7018 0360 0000 6461 1959
RETURN RECEIPT REQUESTED

David Tan
General Manager
Advance Manufacturing Group U.S.A., Inc.
d/b/a OBX Racing Sports
30180 Ahern Avenue
Union City, CA 94587

Re: Consent Agreement and Final Order – Advance Manufacturing Group U.S.A., Inc. d/b/a OBX Racing Sports
Docket No.: CAA-09-2019-0031

Dear Mr. Tan:

Enclosed please find a copy of the fully executed Consent Agreement and Final Order (CAFO) which contains the terms of the settlement reached with EPA Region 9. Your completion of all actions enumerated in the CAFO will close this case.

If you have any questions, please contact Janice Chan of my staff at 415-972-3308.

Sincerely,

Joel E. Jones
Assistant Director
Air, Waste & Toxics Branch
Enforcement Division
United States Environmental
Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

CC: Alison Torbitt, Nixon Peabody LLP

Enclosure

DAVID H. KIM
Assistant Regional Counsel
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105
(415) 972-3882

** FILED **
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SYLVIA QUAST
Regional Counsel
United States Environmental Protection Agency, Region IX

Attorneys for Complainant

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

In the Matter of:	)	Docket No. CAA-09-2019-0031
	)	
Advance Manufacturing Group U.S.A., Inc.,	)	
d/b/a OBX Racing Sports	)	CONSENT AGREEMENT AND
	)	FINAL ORDER PURSUANT TO
Respondent	)	40 C.F.R. §§ 22.13 and 22.18
	)	

I. CONSENT AGREEMENT

A. PRELIMINARY STATEMENT

1. This is a civil administrative penalty assessment proceeding brought under section 205(c)(1) of the Clean Air Act ("CAA" or the "Act"), 42 U.S.C. § 7524(c)(1), and sections 22.13 and 22.18 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules"), as codified at 40 C.F.R. Part 22. In

accordance with 40 C.F.R. §§ 22.13 and 22.18, entry of this Consent Agreement and Final Order ("CAFO") simultaneously initiates and concludes this matter.

2. Complainant is the Assistant Director of the Air, Waste & Toxics Branch of the Enforcement Division, United States Environmental Protection Agency, Region IX (the "EPA"), who has been duly delegated the authority to initiate and settle civil administrative penalty proceedings under section 205(c)(1) of the Act, 42. U.S.C. § 7524(c)(1). EPA Delegation 7-19 (January 18, 2017); EPA, Region 9 Redelegation R9-7-19 (October 5, 2017).

3. Respondent is Advance Manufacturing Group U.S.A., Inc., doing business as OBX Racing Sports, a motor vehicle parts manufacturer and distributor based in Union City, California.

4. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this CAFO without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this CAFO.

B. GOVERNING LAW

5. This proceeding arises under Part A of Title II of the CAA, CAA §§ 202-219, 42 U.S.C. §§ 7521-7554, and the regulations promulgated thereunder. These laws aim to reduce emissions from mobile sources of air pollution, including hydrocarbons and oxides of nitrogen ("NO_x").

6. Section 203(a)(3)(A) of CAA, 42 U.S.C. § 7522(a)(3)(A), prohibits any person from knowingly removing or rendering inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with the CAA emission requirements after sale and delivery to the ultimate purchaser.

7. Violations of CAA section 203(a)(3)(A) by any person other than a manufacturer or dealer are subject to civil penalties of up to $4,735 per defeat device pursuant to section 205 of the CAA, 42 U.S.C. § 7524 and 40 C.F.R. Part 19.

8. Section 203(a)(3)(B) of CAA, 42 U.S.C. § 7522(a)(3)(B), prohibits any person from manufacturing, selling, offering to sell, or installing parts or components whose principal effect is to bypass, defeat, or render inoperative a motor vehicle emission control device or element of design, where the person knows or should know that the part is being offered for sale or installed for such use.

9. Violations of CAA section 203(a)(3)(B) are subject to civil penalties of up to $4,735 per defeat device pursuant to section 205 of the CAA, 42 U.S.C. § 7524 and 40 C.F.R. Part 19.

10. Section 302(e) of the CAA, 42 U.S.C. § 7602(e), defines "person" as "an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof,"

11. The CAA requires EPA to prescribe and revise, by regulation, standards applicable to the emission of any air pollutant from new motor vehicles or new motor vehicle engines which cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare. CAA § 202(a)(1) and (3)(B), 42 U.S.C. § 7521(a)(1) and (3)(B).

12. Highway motor vehicles are one category of motor vehicles for which the EPA has promulgated emission standards. See 42 U.S.C. § 7521; see generally 40 C.F.R. Part 86.

13. Section 216(2) of the CAA, 42 U.S.C. § 7550(2), defines "motor vehicle" as "any self-propelled vehicle designed for transporting persons or property on a street or highway."

14. As required by the CAA, the highway motor vehicle standards "reflect the greatest degree of emission reduction achievable through the application of [available] technology." Section 202(a)(3)(A)(i) of CAA, 42 U.S.C. § 7521(a)(3)(A)(i). Accordingly, EPA has established increasingly stringent highway motor vehicle emission standards at 40 C.F.R. Part 86.

15. Highway motor vehicle manufacturers employ many devices and elements of design to meet these emission standards. Certain hardware devices serve as emission control systems to manage and treat exhaust from highway motor vehicles, in order to reduce levels of regulated pollutants from being created or emitted into the ambient air. Such devices include catalytic converters.

C. ALLEGED VIOLATIONS OF LAW

16. Respondent manufactures and sells aftermarket exhaust parts to various distributors and individual customers located throughout the United States.

17. On September 25, 2017, EPA sent an information request pursuant to section 208(a) of the CAA, 42 U.S.C. § 7542(a), to Respondent regarding products Respondent manufactured and sold since January 1, 2015.

18. Based on Respondent's January 29, 2018 response to EPA's information request and additional information gathered during EPA's investigation, EPA alleges that Respondent manufactured and sold various exhaust systems for highway motor vehicles (the "Devices") identified in Attachment 1 of this CAFO.

19. Prior to the installation of the Devices, one or more catalytic converters must be removed from the highway motor vehicles for which they were designed.

20. The Devices were designed and marketed for use on various highway motor vehicles, and intended to bypass, defeat, or render inoperative emission related devices or elements of design that are installed on those motor vehicles to meet the CAA emission standards.

21. Between January 1, 2015 and September 25, 2017, Respondent manufactured and/or sold 1,551 Devices to distributors and individual customers located throughout the United States.

22. The manufacture, sale, offering for sale, or installation of a device that bypasses, defeats, or renders inoperative a vehicle's emission control systems is prohibited under section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B). EPA alleges that Respondent has committed approximately 1,551 violations of section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), by selling or offering for sale the Devices.

23. In 2018, Respondent submitted financial information to EPA which supports Respondent's claim that it could not afford to pay a full penalty for the alleged violations.

D. TERMS OF CONSENT AGREEMENT

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

    a. admits that EPA has jurisdiction over the subject matter alleged in this CAFO and over Respondent;

    b. neither admits nor denies the specific factual allegations contained in Section I.C of this CAFO;

    c. consents to the assessment of a civil penalty under this Section, as stated below;

    d. consents to the conditions specified in this CAFO;

    e. waives any right to contest the allegations set forth in Section I.C of this CAFO; and

f. waives its rights to appeal the proposed Order contained in this CAFO.

Civil Penalty

25. In exchange for a release of liability for the civil claims alleged herein, Respondent agrees to:

a. pay the civil penalty of TWENTY-FIVE THOUSAND DOLLARS ($25,000) ("EPA Penalty") according to the terms of this CAFO; and

b. pay the EPA Penalty using any method, or combination of methods, provided on the website http://www2.epa.gov/financial/additional-instructions-making-payments-epa, and identifying each and every payment with "Docket No. CAA-09-2019-____." Within 24 hours of the payment of the EPA Penalty, send proof of payment to Janice Chan at:

Mail Code (ENF-2-1)
Enforcement Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

and at Chan.janice@epa.gov ("proof of payment" means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with "Docket No. CAA-09-2019-0031").

26. If Respondent fails to pay the civil administrative penalty specified in Paragraph 25 of this CAFO within 30 days of entry of this CAFO, then Respondent shall pay to EPA a stipulated penalty in the amount of FIVE HUNDRED DOLLARS ($500.00) for each day

the default continues plus the remaining balance of the penalty sum specified in Paragraph 25 upon written demand by EPA.

27. If Respondent fails to timely pay any portion of the penalty assessed under this CAFO, EPA may:

a. request the Attorney General to bring a civil action in an appropriate district court to recover: the amount assessed; interest at rates established pursuant to 26 U.S.C. § 6621(a)(2); the United States' enforcement expenses; and a 10 percent quarterly nonpayment penalty, 42 U.S.C. § 7413(d)(5);

b. refer the debt to a credit reporting agency or a collection agency, 42 U.S.C. § 7413(d)(5), 40 C.F.R. §§ 13.13, 13.14, and 13.33;

c. collect the debt by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, 40 C.F.R. Part 13, Subparts C and H; and

d. suspend or revoke Respondent's licenses or other privileges, or (ii) suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, 40 C.F.R. § 13.17.

28. The provisions of this CAFO shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns. Respondent must give written notice and a copy of this CAFO to any successors in interest prior to any transfer of ownership or control of any portion of or interest in Respondent. Simultaneously with such notice, Respondent shall provide

written notice of such transfer, assignment, or delegation to EPA. In the event of any such transfer, assignment, or delegation, Respondent shall not be released from the obligations or liabilities of this CAFO unless EPA has provided written approval of the release of said obligations or liabilities.

29. By signing this CAFO, Respondent acknowledges that this CAFO will be available to the public and agrees that this CAFO does not contain any confidential business information or personally identifiable information.

30. By signing this CAFO, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that he or she is fully authorized to execute and enter into the terms and conditions of this CAFO and has the legal capacity to bind the party he or she represents to this CAFO.

31. By signing this CAFO, 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.

32. By signing this CAFO, Respondent certifies that it is currently in compliance with section 203(a)(3) of the CAA, 42 U.S.C. § 7522(a)(3).

33. Each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

E. EFFECT OF CONSENT AGREEMENT AND ATTACHED FINAL ORDER

34. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.

35. Penalties paid pursuant to this CAFO shall not be deductible for purposes of federal taxes.

36. This CAFO constitutes the entire agreement and understanding of the parties and supersedes any prior agreements or understandings, whether written or oral, among the parties with respect to the subject matter hereof.

37. Nothing in this CAFO 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 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.

F. EFFECTIVE DATE

38. Respondent and Complainant agree to issuance of the attached Final Order. Upon filing, EPA will transmit a copy of the filed CAFO to the Respondent. This CAFO shall become effective after execution of the Final Order by the Regional Judicial Officer on the date of filing with the Regional Hearing Clerk.

The foregoing Consent Agreement in the Matter of Advance Manufacturing Group U.S.A., Inc. d/b/a OBX Racing Sports, Docket No. CAA-09-2019-____, is hereby stipulated, agreed, and approved for Entry.

FOR RESPONDENT:

(b) (6) [redacted]

Signature

03/21/2019
Date

Printed Name: Dave Tan

Title: General Manager

Address: 30180 Ahern Ave

Union City, CA 94587

FOR COMPLAINANT:

27 March '19
DATE

Joel E. Jones
Assistant Director
Air, Waste & Toxics Branch
Enforcement Division
United States Environmental
Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

II. FINAL ORDER

EPA Region IX and Advance Manufacturing Group U.S.A., Inc. d/b/a OBX Racing Sports, having entered into the foregoing Consent Agreement,

IT IS HEREBY ORDERED that this CAFO (Docket No. CAA-09-2019-0031) be entered, and Respondent shall pay a civil administrative penalty in the amount of TWENTY-FIVE THOUSAND DOLLARS ($25,000) in exchange for a release of liability for the civil claims alleged herein and otherwise comply with the terms set forth in the CAFO.

04/10/19

DATE

STEVEN JAWGIEL
Regional Judicial Officer
United States Environmental
Protection Agency, Region IX

ATTACHMENT 1

Part Name/Number	Description	Quantity
12-1707-5	09-10 Hyundai downpipe	2
12-2001-2	07+ Mazdaspeed downpipe	1
12-2003-4	02 Mazdaspeed downpipe	1
12-2703-4	08+WRX downpipe	1
12-2902-299	99-05 Golf/GTI/Jetta/Beetle downpipe without cat	2
12-4001-4	03-09 Volvo downpipe	2
12-4001-5	04-09 Volvo Downpipe	3
22-1002-1	97-00 Accord test pipes	1
22-1002-2	00-02 Accord test pipes	2
22-1004-3E1	Cat. Converter 94-99 Integra GS-R Housing - Sr	1
22-1004-3E2	94-99 Integra	2
22-1601-4	98-02 Accord test pipes	2
22-1601-4E2	Cat Converter 98-02 Accord 4cyl Housing Strig	1
22-1602-1E1	Cat. EMPTY! 88-00 Civic 2/4Dr./DelSol CA	4
22-1707-4	Cat. Del. 10+ Hyun. Genesis Cp. 2.0T 3.0	2
22-9999-25	Universal straight resonator pipe	1
22-9999-6-2	98-02 Accord 4cyl 204CAT 2H	1
AH-JB-MF-023	OBX Down Pipe 92-98 Golf/Jetta VR6, Cat Delete Pipe	1
CAT101	Resonated Pipe Round 92-00 Civic	3

CAT101-1H	Resonated Pipe Round 97-01 1.6 EL, 88-00 Civic, 88-91 CRX, or 93-97 Del Sol	4
CAT1011HC	Resonated Pipe Square Ceramic 97-01 1.6EL, 88-00 Civic, 88-97 CRX, 93-97 Del Sol	3
CAT101-2h(E)	OBX Cat Delete H-Flow Resonator 94-01 Integra RS LS GS	5
CAT101-2HE	(2 bungs/silver) OBX Cat Delete Resonator 96-00 Civic	8
CAT101C-1H	(1 bung) OBX Ceramic Cat Converter 88-00 Civic 88-91 CRX 93-97 Del Sol	15
CAT102	OBX Performance High Flow Cat Delete Resonator 92-00 Civic H/B	1
CAT104	Resonated Pipe Round 90-93 Accord	4
CAT108-1HC	OBX Catalytic Converter Ceramic 92-02 Prelude	1
CAT109	Resonated Pipe Round 90-93 Integra (All)	4
CAT109-2(HE)	OBX Straight-Thru Cat Delete Resonator 00-05 Eclipse	1
CAT109-2h(E)	OBX Cat Delete H-Flow Resonator 90-93 Integra RS LS GSR	1
CAT109-2HE	Resonated Pipe Square 90-93 Integra	4
CAT110-2HE	OBX Cat Delete Test Pipe 94-01 Acura Integra GS LS RS	7
CAT111(E)	OBX Cat Delete H-Flow Resonator 94-01 Integra GSR With 2 O2 sensor	1
CAT111-2H	Resonated Pipe Round 94-01 Integra	2
CAT111-2H(E)	(silver) OBX Cat Delete Resonator 94-01 Integra GSR	4
CAT111-2HE	OBX Cat Replacement Resonator 94-99 Integra GS-R With 2 O2	12
CAT113	OBX High Flow Cat Converter (cat Delete) 93-97 Toyota Corolla ALL	11
CAT113(2H)(E)	OBX Cat Delete High Flow Resonator 93-97 Toyota Corolla	9
CAT113-2H	Resonated Pipe Square 94-99 Integra	13
CAT113-2HE	Resonated Pipe Square 93-97 Corolla	4
CAT11357	Resonated Pipe Round 06-09 Mitsubishi Eclipse	1
CAT114	OBX Racing High Flow Catalytic Converter Cat Delete Test Pipe	2
CAT115	Resonated Pipe Round 95-98 Talon, 95-99 Eclipse, 94-98 Galant	1
CAT115-2h(E)	OBX Cat Delete H-Flow Resonator 95-99 Eclipse Non-Turbo	2
CAT115-2HE	OBX Cat Deleted Resonator 95-99 Mitsubishi Eclipse/Galant N-Turbo	11
CAT115-2HEA	OBX Performance Cat Delete Hi Flow Resonator 95-99 Eclipse	1
CAT11561/12096	Resonated Pipe 77-89 Porsche Carrera	21
CAT11575	OBX Cat Delete Pipe 91-99 Mitsubishi 3000GT	14
CAT11590	(11590) OBX Catalytic Converter 00-03 Neaon 2.0L L4/SRT 2.4L L4	1
CAT117	Resonated Pipe Round 97-01 Mirage	2
CAT12046	Resonated Pipe Round 2010+ Hyundai Genesis Coupe	12
CAT12263	OBX Racing Cat Delete Resonator For 1994 to 1997 Mazda Miata 1.8L	73
CAT12264	OBX Racing Cat Delete Resonator Fit For 1990-1993 Mazda Miata	88
CAT-12280	OBX Racing Sports Cat Delete Exhaust Test Pipe Nissan 370Z Infiniti G37 VQ37	24

CAT1284/CAT12264	(ss/1pc) OBX Cat Delete Resonator 90-93 Miata 1.6L	1
CAT12864	OBX Cat Delete Resonator 90-93 Miata	6
CAT204	Resonated Pipe Round 00-Up 3.2 CL/TL or 98-02 Accord	2
CAT204-2H	Resonated Pipe Round 98-02 Accord	3
CAT204-2H(E)	OBX Cat Delete H-Flow Resonator 98-02 Honda Accord 4Cyl	2
CAT204-2HE	Resonated Pipe Square 98-02 Accord 4 Cylinder	17
CAT209	OBX High Flow Cat Delete Resonator 02 03 04 05 06 07 Mitsubishi Lancer	12
CAT209-2(HE)	OBX Straight-Thru Cat Delete Resonator 00-05 Eclipse	1
DP.ES-VW02-F	OBX Racing NON-CAT Downpipe 03-09 VW Golf Gti MK5	4
DP0108	OBX Down Pipes 02-05 Subaru WRX EJ20(T). DP0108 (for EX1972)	1
DP10370	OBX Down Pipe 90-94 Toyota MR-2 3S-GTE, 1-O2, 2.75" OD,1Pc. DP10370	21
DP10509	OBX Down Pipe N/A & Turbo Down Pipes 93-97 Mazda RX-7 13B/13B-REW 2pcs. DP10509	15
DP10511	OBX Down Pipe 91-99 Dodge Stealth R/T, Turbo Mitsubishi 3000GT VR-4 6G72TT 2.5" OD. DP10511	12
DP10512	OBX Down Pipe 93-97 Toyota	1
DP10516	OBX Racing 3" Cat Delete Turbo Downpipe 99-05 VW Golf GTI J	26
DP10565	OBX Down Pipes 02-06 Infiniti G35 ,02-06 NISSAN 350Z, Z33, (VQ35DE), Y Pipe. DP10565	4
DP10962	OBD Down Pipes 90-91 Prelude	4
DP11043	OBX Rotated DP & UP Pipe 03-07 Subaru WRX Greddy Turbo DP & Up pipe set. DP11043	3
DP11111	OBX Down Pipe 98-04 Volvo	1
DP11335	OBX Down Pipe Cat Delete 07 08 09 Mini Cooper S 1.6L R56	28
DP-11357	OBX High Flow Cat 06-09 Mitsubishi Eclipse 2.4L Mivec	8
DP-11357	OBX High Flow Cat 06-09 Mitsubishi Eclipse 2.4L Mivec	1
DP11431	OBX Cat Delete Pipe 03-08 RX	24
DP11487	OBX Down Pipe 92-00 Honda Civic T3 5 bolt flange 1pc., Turbo DP11487	4
DP11488	OBX Down Pipe + Dump Pipe 90-96 300ZX Z32 VG30DETT twin turbo, non-Resonated, 4pcs. DP11488	14
DP11489	OBX Exhaust Cat Delete Test Pipe 03-06 Infiniti G35 ALL	27
DP11489SS	OBX Racing Exhaust Cat Delete Down Test Pipe Fit 03 04 05 06 Nissan 350Z VQG3	1
DP11500	OBX Down Pipe 300ZX	1
DP11501	OBX Down Pipe Turbo 89-94 MX5 1.6L W/ GREDDY TYPE-14B, 1O2, 4 Bolts Flange, 1Pc , DP11501	13
DP11502	OBX Down Pipe Supra 2JZGE Turbo 3pcs DP 11502	6
DP11643	OBX Down Pipe 01-07 Volvo S60 FWD 2.0/2.4/2.5T T5/ 2.4D/D5, 3-O2, DP11643	81
DP11644	OBX Cat Delete Turbo Down pipe 05 06 07 Volvo S40N/V50 T	17

DP11649	OBX Performance Cat Delete Catless Downpipe 03-05 Dodge	21
DP11650	OBX Turbo Down pipe 04-07 Cat Delete Volvo S60R S60 R AWD	107
DP11668	OBX Down Pipe MazdaSpeed 6 Turbo Down Pipe 3". DP11668	3
DP11686	OBX Turbo DownPipe 08+ Lancer Evo 10 Test Pipe with O2	2
DP11688	OBX High Flow Test Pipe Mazdaspeed 3 Mazda3 Turbo	37
DP11696	OBX Turbo Downpipe 08-10 135i	6
DP11697	OBX Turbo Downpipe 86-92 RX7 FC3S	10
DP11706A	OBX Downpipe DSM Turbo Elbow Outlet	18
DP11706B	OBX CAT DELETE Downpipe Lancer Evolution Evo 10 X 08 +	6
DP11706C	OBX Racing CAT DELETE Down pipe Honda S2000 02-08 AP1	6
DP11709	OBX Down Pipe Mazdaspeed-3 Turbo 2.3L DISI MZR I4, 3-02, 5-Bolt Flange, 3"OD Pipe, 1Pc. DP11709	9
DP11745	OBX Turbo Down Pipe 05-08 Audi	12
DP11933	OBX Down Pipe 03-08 Saab SS/SC 2.0L 4cyl Turbo, 3"L , 2.5"OD @ Exit. DP11933	44
DP12008	OBX Down Pipe 91-99 3000GT VR4 twin T/GTO, 3pcs. DP12008	66
DP12046	OBX Downpipe 2011-2013 Genesis	5
DP12048	SS OBX Cat Delete BMW E90/E92 335xi AWD/SS OBX Exhaust Catless Test Pipe Downpipe Fits BMW E90 E92	18
DP12075	OBX 05-09 Legacy GT 2.5L/ 08-11 WRX Sedan+HB & STi, TWIN SCROLL Turbo Down Pipe, 2Pcs. 1-O2	11
DP12085	OBX Down Pipe 09-10 Hyundai Genesis Coupe 2.0L Turbo DP, 2pcs 10 11 12. DP12085	13
DP12091	OBX Down Pipe 89-02 Porsche	2
DP12094	OBX Down Pipe Porsche Down Pipe w/Flex Sect. 1Pc. Stainless Steel No O2. DP12094	2
DP12157	OBX O2 Housing Fits for Genesis Coupe 2.0T Cat Delete	2
DP12201	OBX Down Pipe Mitsubishi EVO-X 1-O2, 3.0" OD Pipe, 5-Bolt Flange 1pc. DP12201	5
DP12404	OBX Turbo Downpipe	4
DP12453	OBX Down Pipe 06-10 VW Rabbit 2.5L MK5 2dr/4dr, hatch back DP12453	8
DP12561	OBX Down Pipe 2013+BMW X5 4.4L N63 F-Chassis 3" Hi-Flo Catless Downpipes w/ Resonator	41
DP12566	(ss/2pcs) OBX Downpipe Catless Downpipe 06-09 350Z/G35 VQ35HR	28
DP12582	OBX Down Pipe OBX 2013+ Cadillac ATS	2
DP12963	OBX 2010-2017 Ford Taurus 3.5L V6 Eco boost 2.5" Downpipe	14
DP13045	OBX 3" Catless Resonated Down pipe for 2013 thru 2017 Dart 1.4L Turbo	17
DP13046	OBX 3" Catless Straight Pipe, Down Pipe For 2012 thru 2017 Fiat 500 Abarth	12
DP13075	OBX Down Pipe 1994-07 WRX/STI + 1997-08 Forester GT/XT W/ FlexSec., W/O Cat.	1

DP-ED2064HY(DP-12085)	OBX Down pipe Test pipe Fits for 09+ HYUNDAI GENESIS 2.0T	2
DP-ES-NR32-F1L+R	OBX Turbo Downpipe Nissan Skyline	2
ES-NS01-CRP	OBX High Flow Cat Delete Catalytic Converter Fit 94 95 96 97 98 Nissan	7
ES-NS13-CRP	OBX High Flow Cat Delete Catalytic Converter Fit 89-93 Nissan	8
ES-SW05-CRP	OBX High Flow Cat deleted Resonator 1994-2007 WRX	1
ES-SW07-FSC	OBX Down Pipe 1994-07 WRX/STI + 1997-08 Forester GT/XT W/ FlexSec., W/O Cat.	11
ES-SW07-FSC(E)	OBX Performance 3" Cat Delete Downpipe DP 1994-07	16
ES-SW08-FSC(E)	OBX Racing 3" Cat Deleted Downpipe 08-10 Subaru Impreza WR	9
ES-VW02-F/DP.ES-VW02-F	OBX Racing NON-CAT Downpipe 03-09 VW Golf GTI MK5	8
EX11659(B)	OBX Catback Exhaust Systems Fits 1986-1991 Chevy Corvette C4 5.7L W Catal	3
EX12076	Side Pipe Exhaust with Resonator Insert for Corvette/Camaro/Nova/Firebird	11
H10220	OBX Header 2003-09 Subaru Outback 3.0L 6cyl (H-6) Eliminate Cat, 3-O2 2pc	23
H10220SS	OBX Exhaust Headers for 2000-2004 Subaru Outback Cat Elim	22
H11410	OBX Header 07-12 Mini Cooper Non-S 4-1 W/ Cat. Delete Pipe, 2-O2, 2Pcs.	11
H11425B	OBX Header Manifold For 2006-2013 Corvette Cat deleted	1
H12112	OBX Header 99-05 MR2 Spyder 1.L ZZW30 W/ DP (Cat. Delete), 2pcs	37
H12208	OBX Header 08-16 Nissan 370Z VQ37VHR M. Tube (Straight Pipe) 2Pc	17
H12229	OBX Header 86-90 GM Chevy Camaro/Firebird, Single 3" Catalytic Converter	3
H12374	OBX Exhaust Header Fits VW Golf MK4 R32 MK-4 Header with Cat Delete Down pipe	4
H12754	OBX Header 03-06 Mercedes E55 5.4L Super Charged 6pcs. X-Pipe no cats.	10
H12884	OBX Header 88-98 GMC Silverado/Sierra 1500 2/4 WD Catless	5
H12886	OBX Header 2009-14 5.7L Dodge Quad/Crew Ram Truck, Catless	8
HMZ3CAT	Resonated Pipe Round 04-06 Mazda	1
JB-DP-023	OBX Down Pipe 92-98 Golf/Jetta VR6, Cat Delete Pipe	6
PDP12075	OBX Down Pipe 08-14 Legacy	1
PDP12967	OBX Downpipe 15-16 Golf	2
PDP12976	OBX Downpipe 2013-2016 Dart	2
PDP13036	Down Pipe Replace the Catalytic converter 2014+ F22 BMW 228i 2012+ F30 BMW 328i	4
PDP13039	Down pipe Fits 2009 thru 2015 Audi S5 B8 3.0L V6 TFSI Supercharged	2
PEX12949	OBX Down Pipe 08-14 Legacy	1

PEX12981	OBX Turbo Downpipe Hyundai Veloster 2011 12 13 14 15 16 Catless 3." V-Band	19
RB2025	OBX Down Pipe Nissan Skyline RB20/25. RB2025	1
TOTAL	**Delete pipes**	**1,551**

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CERTIFICATE OF SERVICE

I certify that the original of the fully executed Consent Agreement and Final Order in the matter of Advance Manufacturing Group U.S.A., Inc. d/b/a OBX Racing Sports (Docket No. **CAA-09-2019-**0031) was filed with the Regional Hearing Clerk, U.S. EPA, Region IX, 75 Hawthorne Street, San Francisco, CA 94105, and that a true and correct copy of the same was sent to the following parties:

A copy was mailed via CERTIFIED MAIL to:

David Tan
General Manager
Advance Manufacturing Group U.S.A., Inc. d/b/a OBX Racing Sports
30180 Ahern Avenue
Union City, CA 94587

CERTIFIED MAIL NUMBER: 7018 0360 0000 6461 1959

With a copy emailed to Alison Torbitt, Partner at **atorbitt@nixonpeabody.com**.

An additional copy was hand-delivered to the following U.S. EPA case attorney:

David Kim
Assistant Regional Counsel (ORC-2)
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Steven Armsey
Regional Hearing Clerk (Printed)
U.S. EPA, Region IX

Steven Armsey
Regional Hearing Clerk Signature

2019-04-10
Date