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

In the Matter of:	)	Docket No. CAA-09-2022-0022
	)	
Allied Exhaust Systems, Inc.	)	CONSENT AGREEMENT AND
dba Team Allied Distribution	)	FINAL ORDER PURSUANT TO
	)	40 C.F.R. §§ 22.13 and 22.18
	)	
Benicia, California	)	
	)	
Respondent.	)	
_____	)	

**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 Director of the Air, Waste & Chemicals Branch of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency Region IX (the “EPA”), who has been delegated the authority to initiate and settle civil administrative penalty proceedings under section 205(c)(1) of the CAA, 42 U.S.C. § 7424(c)(1). EPA Delegation 7-19 (January 18, 2017); EPA Region 9 Redelegation R9-7-19 (October 5, 2017); Memorandum from John W. Busterud, Regional Administrator, Region 9, to all Region 9 supervisors and employees re: EPA R9 Organizational Realignment General Redelegation of Authority (May 5, 2020).

3. Pursuant to section 205(c)(1) of the CAA, 42 U.S.C. § 7424(c)(1), and 40 C.F.R. § 19.4, the EPA and the Department of Justice jointly determined that an administrative penalty proceeding is appropriate, for this matter, although the penalty assessment is above \$390,092<sup>1</sup>. 4. Respondent is Allied Exhaust Systems, Inc. dba Team Allied Distribution (“Allied”), a California corporation distributing motor vehicle parts. Allied is headquartered at 3928 Oregon St. in Benicia, California.

5. 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.

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<sup>1</sup> Statutory civil monetary penalties for violations that occurred after November 2, 2015, where penalties were assessed on or after December 23, 2020, but before January 12, 2022. 40 C.F.R. § 19.4.

## **B. Governing Law**

6. 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 ("NOx").

7. 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 where a 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.

8. Violations of CAA section 203(a)(3)(B) are subject to civil penalties of up to \$5,179 per defeat device violation that occurred after November 2, 2015, where penalties are assessed on or after January 12, 2022. Section 205 of the CAA, 42 U.S.C. § 7524 and 40 C.F.R. Part 19.

9. Definitions:

a. 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."

b. 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."

10. 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).

11. 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.

12. 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**

13. Respondent sells and distributes motor vehicle parts to various individual customers located throughout the United States.

14. On August 28, 2019, EPA sent an information request pursuant to section 208(a) of the CAA, 42 U.S.C. § 7542(a), to Respondent regarding hardware and tuners that Respondent sold since January 1, 2018.

15. On August 12, 2020, EPA sent a follow-up information request pursuant to section 208(a) of the CAA, 42 U.S.C. § 7542(a), to Respondent.

16. Based on Respondent's responses on September 26, 2019, November 15, 2019, and September 25, 2020 to EPA's information requests and additional information gathered during EPA's investigation, EPA alleges that Allied sold 3,748 exhaust emission control delete pipes ("subject delete pipes"), 767 aftermarket electronic control module ("ECM") programmers ("subject tuners") and 12 exhaust gas recirculation delete hardware ("subject EGR delete

hardware”) for highway motor vehicles identified in Appendix A of this CAFO (collectively referred to as the “Devices”).

17. The subject delete pipes do not incorporate exhaust aftertreatment emission control devices and are designed to replace exhaust systems containing catalytic converters, diesel oxidation catalysts (“DOCs”), diesel particulate filters (“DPFs”), nitrogen oxide absorbing catalyst (“NACs”), and selective catalytic reduction (“SCRs”).

18. The subject tuners render inoperative the original equipment manufacturer (“OEM”)-certified ECM programming and replace them with programming that alters fuel injection and other elements of design that can lead to significant emission increases compared to the OEM-certified programming. These aftermarket tuners also defeat the OEM-certified ECM programming by overriding the onboard diagnostic system (“OBD”) functions required by regulation under the CAA. The tuners enable removal of DPF without illuminating a malfunction indicator lamp (“MIL”), prompting any diagnostic trouble code (“DTC”), or causing any engine derating.

19. The subject EGR delete hardware replaces and removes the EGR valve and cooler systems found on newer diesel and gas engines from highway motor vehicles for which they are designed. The hardware typically include air intake manifolds and/or exhaust up pipes that replace the EGR valve and/or cooler, and that do not include an EGR port, resulting in the disablement of the EGR system.

20. Hardware devices and emission control systems, such as EGRs, are “device[s] or element[s] of design installed on or in a motor vehicle or motor vehicle engine in compliance with [CAA] regulations” within the meaning of section 203(a)(3)(B) of the CAA, 42U.S.C. § 521(a)(3)(B).

21. Each subject delete pipe, subject tuner, and subject EGR delete hardware part is, and at all relevant times herein was, intended for use with certified motor vehicles and motor vehicle engines including Ford Motor Company (“Ford”), Fiat Chrysler Automobiles US LLC (“Chrysler Dodge”), General Motors Company (“GMC”), and Honda Motor Corporation (“Honda”) vehicles ("Motor Vehicles").

22. A principal effect of each subject delete pipe, subject tuner, and subject EGR delete hardware part is to bypass, defeat, or render inoperative device(s) and/or element(s) of design such as the EGR that was installed on these Motor Vehicles.

23. Respondent knew or should have known that each subject delete pipe, subject tuner, and subject EGR delete hardware part was being offered for sale or installed for such use or put to such use.

24. Between January 1, 2018 and August 28, 2019, Allied sold 4,527 Devices to individual customers located throughout the United States.

25. 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).

26. Allied has committed approximately 4,527 violations of section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), by manufacturing, selling, or offering for sale the Devices.

#### **D. Terms of Consent Agreement**

27. 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 their rights to appeal the proposed Order contained in this CAFO.

### **E. Civil Penalty**

28. Respondent agrees to:

- a. pay the civil penalty of ONE MILLION ONE HUNDRED THOUSAND DOLLARS (\$1,100,000) (“EPA Penalty”) within 30 days of the Effective Date of this CAFO; and
- b. pay the EPA Penalty using any method, or combination of methods, provided on the website <https://www.epa.gov/financial/makepayment>, and identifying the payment with “Docket No. CAA-09-2022-0022.” Within 24 hours of payment of the EPA Penalty, send proof of payment to Janice Chan at [chan.janice@epa.gov](mailto:chan.janice@epa.gov) and the Regional Hearing Clerk at [r9hearingclerk@epa.gov](mailto:r9hearingclerk@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 the payment has been made according to the EPA requirements, in the amount due, and identified with “Docket No. CAA-09-2022-0022”).

29. If Respondent does not timely pay the civil penalty, specified in Paragraph 28, then Respondent shall pay to the 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 28 upon written demand by the EPA.

30. If Respondent fails to timely pay any portion of the penalty assessed under this CAFO, the 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 granted by EPA, or suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, 40 C.F.R. § 13.

#### **F. Certification of Compliance**

31. Respondent certifies that as of the date of their signature of this Consent Agreement, Respondent is complying fully with section 203(a)(3) of the CAA, 42 U.S.C. § 7522(a)(3).



32. Respondent is aware of EPA's November 23, 2020 "Tampering Policy: The EPA Enforcement Policy on Vehicle and Engine Tampering and Aftermarket Defeat Devices under the Clean Air Act."

33. The provisions of this CAFO shall apply to and be binding upon Respondent and their officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns. In the period before Respondent satisfies the obligations set forth in Paragraph 28, 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.

34. 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.

35. 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.

36. By signing this CAFO, Respondent certifies that the information they have 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.

37. Each party agrees to bear its own costs and attorney's fees in this action.

#### **G. General Provisions**

38. 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.

39. This civil penalty paid pursuant to this CAFO is not deductible for federal tax purposes.

40. 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.

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

#### **H. Effective Date**

42. 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: Allied Exhaust Systems, Inc. dba Team Allied Distribution. Docket No. CAA-09-2022-0022 is hereby stipulated, agreed, and approved for entry:

**Allied Exhaust Systems, Inc. dba Team Allied Distribution, Respondent**

4/21/2022  
Date



\_\_\_\_\_  
Darrell Kurth, Chief Executive Officer & President  
Allied Exhaust Systems Inc.

The foregoing Consent Agreement In the Matter of: Allied Exhaust Systems, Inc. dba Team Allied Distribution. Docket No. CAA-09-2022-0022 is hereby stipulated, agreed, and approved for entry:

**United States Environmental Protection Agency, Complainant**

**AMY MILLER-  
BOWEN**

Digitally signed by AMY MILLER-  
BOWEN  
Date: 2022.05.04 15:25:32 -07'00'

\_\_\_\_\_  
Date

\_\_\_\_\_  
Amy C. Miller-Bowen, Director  
Enforcement and Compliance Assurance Division

**Consent Agreement and Final Order**  
**In the Matter of: Allied Exhaust Systems, Inc. dba Team Allied Distribution.**  
**Docket No. CAA-09-2022-0022**

**II. FINAL ORDER**

EPA Region IX and Allied Exhaust Systems, Inc. dba Team Allied Distribution., having entered into the foregoing Consent Agreement,

IT IS HEREBY, ORDERED that this Consent Agreement and Final Order (Docket No. CAA-09-2022-0022), shall be entered and Respondent shall pay a civil administrative penalty in the amount of ONE MILLION ONE HUNDRED THOUSAND DOLLARS (\$1,100,000), and otherwise comply with the terms set forth in the CAFO. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31.

**STEVEN  
JAWGIEL**

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JAWGIEL  
Date: 2022.05.11 12:51:18  
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Date

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Steven Jawgiel  
Regional Judicial Officer  
U.S. Environmental Protection Agency  
Region 9

## Appendix A

### Allied Exhaust Systems, Inc., Violations of CAA § 203 for the period January 1, 2018 through August 28, 2019 for offering for sale or sale of 4,527 Devices

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
7015	SCT X4 Power Flash Progr 1996-2014 FORD Cars & Trucks - Gas	629
K4114A	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE ALUMINIZED CHEVY/GMC 6.	522
K4235A	KIT 4" TURBO-BACK OFF-ROAD SINGLE ALUMINIZED DODGE 5.9L 2500	473
K4318A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 7.3L F250/F350 1999	285
S6004P	4" Down Pipe Back Single Side Off-Road (includes front pipe)	163
K4218A	KIT 4" TURBO-BACK SINGLE ALUMINIZED DODGE 5.9L 2500/3500 200	152
222050	DOWNPIPE 4" TURBO-BACK SINGLE/DUAL GOES IN OFF-ROAD KITS ALU	146
K4346A	KIT 4" TURBO-BACK OFF-ROAD SINGLE ALUMINIZED FORD 6.0L F250/	126
S6004PLM	4" Down Pipe Back Single Side Off-Road (includes front pipe)	115
18982	SYS C/B 01-04.5 Chevy/GMC Diesel 6.6L	105
K5238A	KIT 5" TURBO-BACK OFF-ROAD SINGLE ALUMINIZED DODGE 5.9L 2500	86
40420	TRIPLED OG GT LATE MODEL DIESEL	70
K4114A-2	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE NO MUFFLER ALUMINIZED C	68
5015P	SCT Livewire TS Perf 96-15 Ford Gas & Diesel Plus Edition	66
K5118A	KIT 5" DOWNPIPE-BACK OFF-ROAD SINGLE (4" DOWNPIPE-5") ALUMIN	58
824	03-07 PS 6.0L 4" TURBO BACK	48
K5238A-2	KIT 5" TURBO-BACK OFF-ROAD SINGLE NO MUFFLER ALUMINIZED DODG	45
18980	SYS C/B 01-04.5 Chevy/GMC Diesel 6.6L	44
819	04.5-07 DG 4" TURBO BACK	44
S6126P	4" Turbo Back Single Side Dodge 2004.5-2007 2500/3500 Cummin	43
S6212PLM	4" Turbo Back Single Side Off-Road - no muffler Ford 2003-20	42
K4232A	KIT 4" TURBO-BACK OFF-ROAD SINGLE QUIET-TONE ALUMINIZED DODG	41
K4235A-2	KIT 4" TURBO-BACK OFF-ROAD SINGLE NO MUFFLER ALUMINIZED DODG	38
S6126PLM	4" Turbo Back Single Side - no muffler Dodge 2004.5-2007 250	37
801	01-07 GM 6.6L 4" DP BACK	37
120005	DOWNPIPE 4" TURBO-BACK SINGLE/DUAL ALUMINIZED FORD 7.3L F250	37

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
K4114S	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE STAINLESS STEEL CHEVY/G	35
K4235S	KIT 4" TURBO-BACK OFF-ROAD SINGLE STAINLESS STEEL DODGE 5.9L	34
K4318A-RP	KIT 4" TURBO-BACK SINGLE MUFFLER REPLACEMENT PIPE ALUMINIZED	31
S60200PLM	5" Down Pipe Back Single Side No Muffler AL Chev/GMC 2001-20	30
K4318A-2	KIT 4" TURBO-BACK SINGLE NO MUFFLER ALUMINIZED FORD 7.3L F25	29
K4318S	KIT 4" TURBO-BACK SINGLE STAINLESS STEEL FORD 7.3L F250/F350	28
K4114A-RP	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIP	27
K5118A-2	KIT 5" DOWNPIPE-BACK OFF-ROAD SINGLE NO MUFFLER (4" DOWNPIPE	27
K4332A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 7.3L EXCURSION 2001	26
K4346A-2	KIT 4" TURBO-BACK OFF-ROAD SINGLE NO MUFFLER ALUMINIZED FORD	26
GP003	4" Down Pipe Kit (2 pc) Ford 6.0L 2003-2007	25
K4113A	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE QUIET-TONE ALUMINIZED C	24
222001	DOWNPIPE 4" TURBO-BACK SINGLE/DUAL ALUMINIZED DODGE 5.9L 250	22
K4218A-2	KIT 4" TURBO-BACK SINGLE NO MUFFLER ALUMINIZED DODGE 5.9L 25	22
K5322A	KIT 5" TURBO-BACK SINGLE (4" DOWNPIPE-5") ALUMINIZED FORD 7.	22
222052	DOWNPIPE 5" TURBO-BACK SINGLE/DUAL GOES IN OFF-ROAD AND RACE	20
K4102A	KIT 4" TURBO-BACK OFF-ROAD SINGLE (3" DOWNPIPE-4") ALUMINIZE	19
K5238A-RP	KIT 5" TURBO-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIPE A	19
S6212P	4" Turbo Back Single Side Off-Road Ford 2003-2007 F-250/350	18
S61160PLM	5" Turbo Back Single Side Exit No Muffler AL Dodge 2004.5-20	17
125010	DOWNPIPE 4" 1ST SECTION TURBO-BACK SINGLE/DUAL ALUMINIZED FO	17
125015	DOWNPIPE 4" 2ND SECTION TURBO-BACK SINGLE/DUAL ALUMINIZED FO	17
817	03-05 PS 6.0 EXCURS 4" TURBO BAC	16
EMDODTWIN	TURBO DOWN PIPE	15

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
S62240PLM	5" Turbo Back Single Side Exit No Muffler AL Ford 2003-2007	13
824NM	03-07 PS 6.0L 4" TURBO BACK NM	12
K5350A	KIT 5" TURBO-BACK OFF-ROAD SINGLE (4" DOWNPIPE-5") ALUMINIZE	12
K4235A-RP	KIT 4" TURBO-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIPE A	11
141005	SYS TAILPIPE - DODGE	11
125050	KIT 4" DOWNPIPE OFF-ROAD ALUMINIZED FORD 6.0L 2003-2007 (AUT	10
K5118A-RP	KIT 5" DOWNPIPE-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIP	10
K5222A	KIT 5" TURBO-BACK SINGLE ALUMINIZED DODGE 5.9L 2500/3500 200	10
K5222A-2	KIT 5" TURBO-BACK SINGLE ALUMINIZED NO MUFFLER DODGE 5.9L 25	10
30800	Up Pipe	9
K4346A-RP	KIT 4" TURBO-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIPE A	9
805	03-04.5 DG 5.9L 4" TURBO BACK	8
K4102A-2	KIT 4" TURBO-BACK OFF-ROAD SINGLE NO MUFFLER (3" DOWNPIPE-4"	8
K5322A-2	KIT 5" TURBO-BACK SINGLE NO MUFFLER (4" DOWNPIPE-5") ALUMINI	8
K5350A-2	KIT 5" TURBO-BACK OFF-ROAD SINGLE NO MUFFLER (4" DOWNPIPE-5"	8
S6104P	4" Turbo Back Single Side (4WD only) AL Dodge 2003-2004 2500	7
18989	SYS TB 04 Dodge Ram HO Diesel	7
K4346S	KIT 4" TURBO-BACK OFF-ROAD SINGLE STAINLESS STEEL FORD 6.0L	7
K5222A-RP	KIT 5" TURBO-BACK SINGLE MUFFLER REPLACEMENT PIPE ALUMINIZED	7
K5238S	KIT 5" TURBO-BACK OFF-ROAD SINGLE STAINLESS STEEL DODGE 5.9L	7
S6004AL	4" Down Pipe Back Single Side AL Chev/GMC 2001-2007 2500/350	6
S6212AL	4" Turbo Back Single Side Exit AL Ford 2003-2007 F-250/350	6
K4116A	KIT 4" DOWNPIPE-BACK OFF-ROAD DUAL ALUMINIZED CHEVY/GMC 6.6L	6
K4218A-RP	KIT 4" TURBO-BACK SINGLE MUFFLER REPLACEMENT PIPE ALUMINIZED	6
K4218S	KIT 4" TURBO-BACK SINGLE STAINLESS STEEL DODGE 5.9L 2500/350	5



<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
K4353A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 6.0L F450 2004-2007	5
614NM	03-07 PS 6L 5" TurboBack AUTO NM	4
619	04.5-07 DG 5" TURBO BACK	4
17980	SYS TB 01-07 GM Diesel 6.6L	4
18922	SYS TB 05 Ford 6.0L CC Diesel 4in	4
222051	DOWNPIPE 4" TURBO-BACK SINGLE/DUAL QUIET-TONE GOES IN OFF-ROAD	4
K4320A	KIT 4" TURBO-BACK DUAL ALUMINIZED FORD 7.3L F250/F350 1999-2	4
K4324A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 7.3L E-SERIES VAN 1	4
K4348A	KIT 4" TURBO-BACK OFF-ROAD DUAL ALUMINIZED FORD 6.0L F250/F3	4
K5118S	KIT 5" DOWNPIPE-BACK OFF-ROAD SINGLE (4" DOWNPIPE-5") STAINL	4
10110	01-07 GM 6.6L 4" DOWN PIPE	4
18921	SYS TB 04.5-07 Dodge Diesel 5.9L	3
18935	SYS TB 03-04 Dodge Ram 3500 5.9L Alzd	3
S60200AL	5" Down Pipe Back Single Side AL Chev/GMC 2001-2007 2500/350	3
S60200SLM	5" Down Pipe Back Single Side No Muffler T409 Chev/GMC 2001-	3
S6104AL	4" Turbo Back Single Side (4WD only) AL Dodge 2003-2004 2500	3
15415	Down-Pipe Assy 03-07 Ford Diesel	3
17922	SYS TB 05 Ford 6.0L CC Diesel 4in	3
17982	SYS TB 01-07 GM Diesel 6.6L	3
17999	SYS TB 01-07 GM Diesel 6.6L Pro	3
18991	USE 18945	3
120004	INTERMEDIATE PIPE 4" TURBO-BACK SINGLE/DUAL ALUMINIZED FORD	3
126004	KIT 3-1/2" DOWNPIPE OFF-ROAD ALUMINIZED FORD 6.0L 2003-2007	3
K4237A	KIT 4" TURBO-BACK OFF-ROAD DUAL ALUMINIZED DODGE 5.9L 2500/3	3
K4326A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 7.3L F240/F350 CAB	3
K5322A-RP	KIT 5" TURBO-BACK SINGLE MUFFLER REPLACEMENT PIPE (4" DOWNPI	3
141003	TAILPIPE 5" 1ST SECTION TURBO/CAT-BACK SINGLE GOES IN OFF-RO	3
601	01-07 GM 6.6L 5" DP Back	3
10100	04.5-10 GM 6.6 TURBO DIRECT PIPE	3

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
93130	Prebent Pipe <1>	2
18927	SYS TB PI 05-07 F250/ F350	2
GMAL401	4" Front-Pipe w/Flange AL Chev/GMC 2001-2005 Duramax 2500/35	2
S61160AL	5" Turbo Back Single Side Exit AL Dodge 2004.5-2007 2500/350	2
7416	SCT X4 Power Flash Progr 1999 - 2014 GM Cars & Trucks	2
48-36604-HN	Twisted Steel 3 IN 304 Stainless Steel Race Series Down-Pipe	2
15399	Down-Pipe 06-07 GM Diesel 6.6L	2
17994	SYS TB 01-07 GM Diesel 6.6L Pro	2
17998	SYS TB 04.5-07 Dodge Diesel 5.9L	2
18981	SYS C/B 01-4.5 Chevy/GMC Diesel 6.6L	2
18999	SYS TB 01-07 GM Diesel 6.6L Pro	2
124001	DOWNPIPE 4" TURBO-BACK SINGLE ALUMINIZED FORD E SERIES VAN 1	2
K4114S-2	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE NO MUFFLER STAINLESS ST	2
K4355A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 6.0L E-SERIES VAN 2	2
605	03-04.5 DG 5.9L 5" Turbo Back	2
614	03-07 PS 6.0L 5" Turbo Back AUTO	2
10111	01-07 GM 6.6L 4" DOWN PIPE	2
20811	04.5-11 DG DOWN PIPE	2
820	01-07 GM 6.6 4" Cat Back	2
54450	Pipe - Front <1>	2
46-10072	BladeRunner Intake Manifold Dodge Diesel Trucks 07.5-18 L6-6	1
49-02003	ATLAS 4 IN Aluminized Steel Turbo-Back Exhaust System w/ Muf	1
49-02058	ATLAS 4 IN Aluminized Steel Turbo-Back Exhaust System w/ Muf	1
49-04086-P	ATLAS 4 IN Aluminized Steel DPF-Back Exhaust System w/ Polis	1
49-12009-1	Large Bore-HD 4 IN 409 Stainless Steel Turbo-Back Exhaust Sy	1
49-42009-1	Large Bore-HD 4 IN 409 Stainless Steel Turbo-Back Exhaust Sy	1
49-42023	Large Bore-HD 4 IN 409 Stainless Steel Race Pipe Dodge Diese	1
49-44019	MACH Force-Xp 4 IN 409 Stainless Steel DPF Delete Race Pipe	1
49-44086-P	Large Bore-HD 4 IN 409 Stainless Steel DPF-Back Exhaust w/Du	1
17131	SYS TB 04-07 Dodge Diesel EC/CC 4in	1
18994	SYS TB 01-07 GM Diesel 6.6L Pro	1
GMS9401	4" Front-Pipe w/Flange T409 Chev/GMC 2001-2005 Duramax 2500/	1
GMS9421	4" Front-Pipe T409 Chev/GMC 2006-2007 Duramax 2500/3500	1
S6004BLK	4" Down Pipe Back Single Side Black Coated Chev/GMC 2001-200	1
S61160409	5" Turbo Back Single Side Exit T409 Dodge 2004.5-2007 2500/3	1
S6240AL	4" Cab & Chassis Turbo Back Single Side Exit Off Road AL For	1
716	05-06 PS 6.0L 4" TURBO BACK DUAL	1

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
1648	Do Not Sell - Race / Delete Part	1
1836	Do Not Sell - Race / Delete Part	1
701	01-07 DURAMAX 6.6L 4" TURBO BACK	1
714	03-04 PS 6.0L 4" TURBO BACK DUAL	1
726	01-07 GM66DUALY TBOBACK DUAL4	1
801NM	01-07 GM 6.6L 4" DP BACK NM	1
819NM	04.5-07 DG 4" TURBO BACK NM	1
833NB	Do Not Sell - Race / Delete Part	1
837NB	Do Not Sell - Race / Delete Part	1
864	Do Not Sell - Race / Delete Part	1
SS614	03-07 PS 6.0L 5" Turbo Back AUTO	1
SS619	04.5-07 DG 5" TURBO BACK	1
SS805NM	03-04.5 DG 5.9L 4" TURBO BACK NM	1
SS817	03-05 PS 6.0 EXCURS 4" TURBO BAC	1
SS819	04.5-07 DG 4" TURBO BACK	1
SS824	03-07 PS 6.0L 4" TURBO BACK	1
48-34112-YN	PFADT Series 304 Stainless Steel Race Series Tri-Y Long Tube	1
48-34130-YN	Twisted Steel 3 IN 304 Stainless Steel Race Series Header Co	1
48-36315-HN	Twisted Steel 3-1/2 to 3 IN 304 Stainless Steel Race Series	1
48-36317-HN	ADVANCE FLOW ENGINEERING	1
48-43011	Twisted Steel Y-Pipe 3 IN to 3-1/2 IN 409 Stainless Steel Ra	1
48-43020-HN	Twisted Steel 3 IN 409 Stainless Steel Street Series Down-Pi	1
49-02047	ATLAS 5 IN Aluminized Steel Turbo-Back Exhaust System w/ Muf	1
49-04053NM	ATLAS 4 IN Aluminized Steel Down-Pipe Back Exhaust System w/	1
17256	EXHAUST KIT	1
60623	Down Pipe 3 in. For Racing Vehicles Only	1
140364	Multi-Core Cat-Back? 2.5 in. Incl. Connecting Pipes/Mufflers	1
16900	Sys TB 04.5- GM Duramax CC/SB 4" DP	1
16908	Sys TB 01- GM Duramax 5" CC/SB	1
16918	Sys TB 05- Ford 6.0 CC DSL W/4" DP	1
17989	SYS TB 04 Dodge Ram HO Diesel	1
17993	SYS TB 03-07 Ford Diesel 6.0L	1
18920	SYS TB 04.5-07 Dodge Diesel 5.9L	1
18990	SYS TB 04 Dodge Ram Diesel HO	1
18993	Use 18941	1
18998	SYS TB 04.5-07 Dodge Diesel 5.9L	1
120007	INTERMEDIATE PIPE-S PIPE TURBO-BACK 4" TO 5" ALUMINIZED FORD	1
120008	DOWNPIPE 3-1/2" BUMPED TO 4"OD WELDED ENDFORM ALUMINIZED	1

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
165010	DOWNPIPE 4" 1ST SECTION TURBO-BACK SINGLE/DUAL STAINLESS STE	1
165015	DOWNPIPE 4" 2ND SECTION TURBO-BACK SINGLE/DUAL STAINLESS STE	1
324116	DOWNPIPE 4" DOWNPIPE BACK SINGLE DIESEL PARTICULATE FILTER	1
K4108A	KIT 4" TURBO-BACK OFF-ROAD SINGLE (3" DOWNPIPE-4") ALUMINIZE	1
K4114S-RP	KIT 4" DOWNPIPE-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIP	1
K4115A	KIT 4" DOWNPIPE-BACK OFF-ROAD DUAL QUIET-TONE ALUMINIZED CHE	1
K4220A	KIT 4" TURBO-BACK DUAL ALUMINIZED DODGE 5.9L 2500/3500 2003-	1
K4232A-RP	KIT 4" TURBO-BACK OFF-ROAD SINGLE QUIET-TONE MUFFLER REPLACE	1
K4233A	KIT 4" TURBO-BACK OFF-ROAD DUAL QUIET-TONE ALUMINIZED DODGE	1
K4318S-2	KIT 4" TURBO-BACK SINGLE NO MUFFLER STAINLESS STEEL FORD 7.3	1
K4320A-2	KIT 4" TURBO-BACK DUAL NO MUFFLER ALUMINIZED FORD 7.3L F250/	1
K4328A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 7.3L F450 1999.5-20	1
K4330A	KIT 4" TURBO-BACK SINGLE ALUMINIZED FORD 7.3L F550 ROLLOVER	1
K4332A-2	KIT 4" TURBO-BACK SINGLE NO MUFFLER ALUMINIZED FORD 7.3L EXC	1
K4332A-RP	KIT 4" TURBO-BACK SINGLE MUFFLER REPLACEMENT PIPE ALUMINIZED	1
K4346S-RP	KIT 4" TURBO-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIPE S	1
K5238S-2	KIT 5" TURBO-BACK OFF-ROAD SINGLE STAINLESS STEEL NO MUFFLER	1
K5238S-RP	KIT 5" TURBO-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIPE S	1
K5246A	KIT 5" TURBO-BACK OFF-ROAD DUAL (5"-4" TAILPIPES) ALUMINIZED	1
K5322S	KIT 5" TURBO-BACK SINGLE (4" DOWNPIPE-5") STAINLESS STEEL FO	1
K5350S-RP	KIT 5" TURBO-BACK OFF-ROAD SINGLE MUFFLER REPLACEMENT PIPE (	1

<b>Part Number</b>	<b>Description Provided by Allied</b>	<b>Qty</b>
141006	TAILPIPE 5" 2ND SECTION ALUMINIZED SEE NOTES FOR DIESEL MODE	1
EFORDPSTURBO	TURBO DOWN PIPE	1
817571	75-'81 GM F-Body V-8 Off Road Use Only All 2.50" Mandrel Ben	1
DAL-429	5 Inch Down Pipe 07 Dodge 5.9	1
S6212BLK	4" Turbo Back Single Side Exit Black Finish Ford 2003-2007	1
S6222AL	5 Turbo Back Single Side Exit AL Ford F-250/350 7.3L al	1
6822SJT	HEADER KIT	1
D451B	Headers	1
H8058-1	HEADER KIT CHEV TRK BBC 92-95 CTD	1
H8068-1	HEADER KIT CHEV CAMARO SBC 82-92 CTD	1
39403	94-97.5 7.3 L CONVERTER PIPE	1
628	07-10 GM LMM 5" DPF BACK	1
640	11-13 PS 6.7L 5" DPF BACK	1
	<b>TOTAL</b>	<b>4,527</b>

**CERTIFICATE OF SERVICE**

This is to certify that the fully executed Consent Agreement and Final Order in the matter of Allied Exhaust Systems, Inc. dba Team Allied Distribution, Docket Number CAA-09-2022-0022 was filed with the Regional Hearing Clerk, U.S. EPA, Region IX, 75 Hawthorne Street, San Francisco, CA 94105 and a true and correct copy of the same was sent to the following parties:

**FOR RESPONDENT:**

(Via Electronic Mail)

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Benicia, CA 94501  
Darrell.Kurth@Team-Allied.com

**FOR COMPLAINANT:**

(Via Electronic Mail)

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Leong.denise@epa.gov

**PONLY TU**

Digitally signed by

PONLY TU

Date: 2022.05.11

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Regional Hearing Clerk  
U.S. EPA, Region IX