



OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

WASHINGTON, D.C. 20460

August 8, 2024

EcoDiesel USA
Randy Ziegelbauer
215088 Scout Road
Mosinee, Wisconsin 54455

Dear Mr. Ziegelbauer:

The United States Environmental Protection Agency (EPA) has investigated and continues to investigate you as an individual as well as EcoDiesel USA, also operating under the name Reckless Motorsports USA ("EcoDiesel USA" or "You"), for noncompliance with the Clean Air Act ("CAA" or "the Act"), 42 U.S.C. §§ 7401-7671q, and its implementing regulations. As summarized in this Notice of Violation, the EPA has determined that EcoDiesel USA has sold, offered for sale, or caused the offer for sale of parts or components for motor vehicle engines that bypass, defeat, or render inoperative devices or elements of design installed on motor vehicles and motor vehicle engines to meet emission standards promulgated under the CAA, and knew or should have known that these parts or components were offered for sale or installed for such use or put to such use. Therefore, you have violated Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B). The EPA continues to investigate these violations and other potential violations under the Act and its implementing regulations.

Law Governing Alleged Violations

This Notice of Violation arises under Part A of Title II of the Act, 42 U.S.C. §§ 7521-7554, and the regulations promulgated thereunder. These laws were enacted to reduce air pollution from mobile sources of air pollution. In creating the Act, Congress found, in part, that "the increasing use of motor vehicles . . . has resulted in mounting dangers to the public health and welfare."¹ Congress's purpose in creating the Act, in part, was "to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population," and "to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution."²

The EPA's allegations concern parts or components for motor vehicles and engines subject to emission standards.³ The Act requires the EPA to prescribe and revise, by regulation, standards applicable to the emission of any air pollutant from new motor vehicles or engines that cause or contribute to air

¹ CAA § 101(a)(2), 42 U.S.C. § 7401(a)(2).

² CAA § 101(b)(1)-(2), 42 U.S.C. § 7401(b)(1)-(2).

³ See generally 40 C.F.R. Part 86, Subpart A (setting emission standards for these categories).

pollution, which may reasonably be anticipated to endanger public health or welfare.⁴ As required by the Act, the emission standards “reflect the greatest degree of emission reduction achievable through the application of [available] technology.”⁵ Motor vehicles and engines are subject to specific emission standards for each pollutant, based on a vehicle’s or engine’s class and model year.⁶

Vehicle and engine manufacturers employ many devices and elements of design to meet emission standards. *Element of design* means “any control system (*i.e.*, computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine.”⁷ For example, manufacturers often employ retarded fuel injection timing systems as a primary emission-related element of design to achieve reduction of emissions of oxides of nitrogen (NO_x) and particulate matter (PM). Manufacturers also employ certain hardware devices as emission control systems and elements of design to reduce emissions of regulated pollutants into the ambient air. Examples of such devices include sensors, filtration systems such as diesel particulate filters (DPF) systems, also referred to as periodic trap oxidizers, exhaust gas recirculation (EGR) systems, and catalyst devices such as diesel oxidation catalysts (“DOC,” also referred to as “CAT”), NO_x adsorption catalysts, and selective catalytic reduction⁸ (SCR) systems. SCR systems apply an aqueous urea, known as diesel emission fluid (DEF), onto a special catalyst, causing a chemical reaction and thereby reducing NO_x emissions. Modern vehicles and engines are equipped with devices known as electronic control modules (ECMs), also commonly referred to as electronic control units (ECUs). ECMs or ECUs continuously monitor engine and other operating parameters and control the emission control devices, such as the fueling strategy.

Manufacturers further employ onboard diagnostics, or “OBD,” which comprise of systems that monitor components that can affect the emission performance of a motor vehicle, detect problems with the vehicle’s emission-related systems that could cause the vehicle to fail to comply with the CAA’s emission standards, alert drivers to these problems, and store electronically-generated malfunction information.⁹ If a problem is detected, the OBD system illuminates a warning indicator on the vehicle instrument panel to alert the driver, called a malfunction indicator light or check engine light. The OBD system also records diagnostic trouble codes to provide ease of identification of the emission control problem for mechanics to repair. OBDs may cause an engine power reduction (known as “limp mode”) to prompt repair of a missing or malfunctioning emission-related device or element of design. Given these functions, the OBD is a key part of a motor vehicle’s emission control system.

To ensure that every new motor vehicle or motor vehicle engine sold, offered for sale, imported, delivered for introduction into commerce, or introduced into commerce in the United States (collectively, “introduced into commerce”) satisfies applicable emission standards, the EPA runs a certification program for manufacturers. Under this program, the EPA issues certificates of conformity

⁴ CAA § 202(a)(1) and (3)(B), 42 U.S.C. § 7521(a)(1) and (3)(B).

⁵ CAA § 202(a)(3)(A)(i), 42 U.S.C. § 7521(a)(3)(A)(i).

⁶ See, e.g., heavy-duty diesel engine emission standards at 40 C.F.R. §§ 86.004-11, 86.007-11, 86.099-11.

⁷ 40 C.F.R. § 86.094-2.

⁸ SCR systems include catalyst injection and tank storage components.

⁹ See CAA § 202(m), 42 U.S.C. § 7521(m), requiring EPA to promulgate regulations requiring OBD systems for motor vehicles after 2007; see also 40 C.F.R. §§ 86.005-17, 86.007-17, 86.1806-05, and 86.1806-17.

(COCs), thereby qualifying motor vehicles and engines for introduction into commerce.¹⁰ To obtain a COC, an original equipment manufacturer (OEM) must submit a COC application to the EPA for each engine family (also referred to as test group) and each model year in which it intends to manufacture or import motor vehicles or engines for introduction into commerce. The COC application must include, among other things, identification of the covered engine family, a description of the motor vehicle or engine and its emission control systems, all auxiliary emission control devices (AECDs)¹¹ and the engine parameters they sense, as well as test results from a test vehicle or engine showing that it satisfies the applicable emission standards.¹² The motor vehicles or motor vehicle engines must then be manufactured exactly as described in the approved COC application, in part to ensure that the emission control systems function as described.

In addition, the Act makes it a violation “for any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter, and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use.”¹³ It is also a violation to cause any of the foregoing acts.¹⁴

The Alleged Violations

The EPA has determined that EcoDiesel USA has sold, offered for sale, or caused the offer for sale, multiple products (commonly referred to as “Defeat Devices”) that have a principal effect of bypassing, defeating, or rendering inoperative emission control devices or elements of design certified to control emissions on motor vehicles or motor vehicle engines. EcoDiesel USA operates two websites as platforms to sell or offer to sell Defeat Devices: <https://www.recklesstx.com/> (hereinafter, the “Reckless Website”) and <https://www.ecodieselusa.com/> (hereinafter, the “EcoDiesel Website”). The “Shop” page on the Reckless Website links directly to the EcoDiesel Website, where a prospective customer may complete a purchase.

On the aforementioned websites, EcoDiesel USA advertises for sale Defeat Devices which are intended for use with a variety of motor vehicles and motor vehicle engines including, but not limited to, Dodge Ram, General Motors, Ford Motor Company, Fiat Chrysler Automobiles, and Cummins.

The “About Us” page on the EcoDiesel Website describes the products sold through its online store. The webpage describes that EcoDiesel USA offers customers “the most in-depth tunes for your ECU and TCU by unlocking hidden performance in your turbo diesel engine.” Your business endorses customers to “[c]ompliment” EcoDiesel USA tuner products with “performance parts” sold on

¹⁰ 40 C.F.R. § 86.007-30.

¹¹ An AECD is “any element of design which senses temperature, vehicle speed, engine revolutions per minute, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system.” 40 C.F.R. § 86.082-2.

¹² 40 C.F.R. §§ 86.004-21, 86.007-21, 86.094-21, 86.096-21; *see also* EPA, Advisory Circular Number 24-3: Implementation of Requirements Prohibiting Defeat Devices for On-Highway Heavy-Duty Engines (Jan. 19, 2001).

¹³ CAA § 203(a)(3)(B), 42 U.S.C. § 7522(a)(3)(B).

¹⁴ CAA § 203(a), 42 U.S.C. § 7522(a).

EcoDiesel's online store. You claim that this pairing would offer "the ultimate RAM EcoDiesel tune experience."

In addition to its websites, EcoDiesel USA promotes its products by publishing videos on YouTube.com. The "About" page of your EcoDiesel Website includes a YouTube video entitled "Deleted Ecodiesel Dyno Results."¹⁵ The YouTube account of "RecklessMotorSportsUSA," user handle "@recklessmotorsportsusa3443," uploaded the video.

In reviewing other videos published by the RecklessMotorSportsUSA account, the EPA has found information indicating that EcoDiesel USA operates RecklessMotorSportsUSA YouTube Account and user handle @recklessmotorsportsusa3443. Primarily, the RecklessMotorsportsUSA YouTube account listed "recklesstx.com" (the Reckless Website) as its associated website. Additionally, a video posted by RecklessMotorSportsUSA offered the following video description: "Www.ecodieselusa.com."¹⁶ In another video, the video description directed viewers to the Reckless Website by instructing, "Check out our website www.recklesstx.com to purchase our new line of camshafts or remote tuning for your hemi or ls engine."¹⁷

Moreover, YouTube viewers post comments on RecklessMotorSportsUSA videos, and the EPA has observed that the RecklessMotorSportsUSA user handle responded and directed viewers to contact EcoDiesel USA. For example in the "Deleted Ecodiesel Dyno Results" video posted on February 1, 2021, user handle @loganhubbard3177 stated that they "would be interested in this tune" and @recklessmotorsportsusa3443 responded, "www.recklesstx.com/shop or email me at randy@recklesstx.com and we can talk."¹⁸ In the comments section of the same video, user handle @codytabor3685 asked, "Does ur tune turn off def fluid" and @recklessmotorsportsusa3443 responded, "Sales@ecodieselusa.com."¹⁹ Sometime in March 2024, user handle @timhall5226 commented, "Can you contact me please. Not having any luck on the website."²⁰ User handle @recklessmotorsportsusa3443 then replied, "I'm only one person haven't gone through the emails from last 2-3 days been moving."²¹ Appendix A of this letter provides screenshots of each comment and response mentioned above.

Because RecklessMotorSportsUSA lists the Reckless Website as its website, includes web addresses for both Reckless Website and EcoDiesel Website in its video descriptions, and user handle @recklessmotorsportsusa3443 directed viewers to the websites of EcoDiesel USA, the Agency finds that EcoDiesel USA uses the RecklessMotorSportsUSA YouTube account for promoting and advertising its products.

¹⁵ RecklessMotorsportsUSA, "Deleted Ecodiesel Dyno Results" (Feb. 1, 2021), <https://www.youtube.com/watch?v=SJd8eVkrDyW>.

¹⁶ RecklessMotorsportsUSA, "Part 3 of The Intro to Tuning Your Own TRX" (Feb. 12, 2024), <https://www.youtube.com/watch?v=xpXkT9w1zZQ>.

¹⁷ RecklessMotorsportsUSA, "2019 Ram 1500 Modified Exhaust" (Feb. 19, 2020), <https://www.youtube.com/watch?v=f6cPjKPpVRY>.

¹⁸ RecklessMotorsportsUSA, "Deleted Ecodiesel Dyno Results" (Feb. 1, 2021), <https://www.youtube.com/watch?v=SJd8eVkrDyW>.

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

In 2024, the EPA conducted several reviews of the EcoDiesel Website, Reckless Website, and the YouTube account of RecklessMotorSportsUSA for advertisements of Defeat Devices. Since January 1, 2021, EcoDiesel USA advertised for sale at least three different categories of “defeat devices”: (1) Aftermarket Software ECM Programs; (2) Exhaust Aftertreatment Delete Pipes; and (3) EGR Delete Parts. We describe the products in further detail below.

1. Aftermarket Software ECM Programs

As to the first category, the aftermarket software ECM programs are commonly referred to as a “tune” or “calibration.” These programs are either distributed in a console (commonly referred to as a “tuner” or “programmer”) or transmitted electronically via weblink or email that are designed to modify the vehicle’s original ECM programming or calibrations and/or OBD operation, where a principal effect of the program is to bypass, defeat, or render inoperative devices or elements of design, including EGR, DOC, DPF, SCR, or OBD systems, or fuel injection timing calibrations, installed on or in motor vehicle engines (“Defeat Tuning Products”).

EcoDiesel USA explained the design of their tunes in YouTube videos and shared one of those videos on the EcoDiesel Website. The “Deleted Ecodiesel Dyno Results” YouTube video, found on the “About” page of the EcoDiesel Website, features a person explaining a change of performance on a truck installed with an EcoDiesel USA tune. The person speaking on camera is a white male and appears to be in his early 30s. The person has a short beard and is seen wearing a baseball cap. The person explains that he tested the tune on a vehicle that had “all of the equipment missing” using a “dyno,” otherwise known as a dynamometer. The dynamometer testing, by the individual’s estimation, produced increased torque and horsepower output after installing the tunes and removing some of the emissions control equipment from the vehicle. The video displayed the measured horsepower and torque after installing three different tunes. The following text appeared on screen for each tune, while showing in the background a white Dodge Ram truck strapped down and accelerating on spinning drums: (1) “deleted no tuning 224hp 360tq”; (2) “Standard Tune 270hp 474tq”; and (3) “Max Tune 281hp 510tq.” In all three tuning setups, black smoke can be seen emitting from the tailpipe of the vehicle, which indicates that some emission control equipment has been removed from the vehicle. In the description of the video, there is a hyperlink to the EcoDiesel Website selling the “14-19 EcoDiesel Ezlynk Jeep and Ram Tuner and Tuning only” product. Under the hyperlink, the text reads “buy here.” In comparing other videos published by the RecklessMotorSportsUSA YouTube account, the Agency thinks that other aftermarket software or tunes sold by EcoDiesel USA are similarly designed as the tunes depicted in the “Deleted Ecodiesel Dyno Results” YouTube video.

EcoDiesel USA also explained the design of its tunes in its product description on the EcoDiesel Website. On the “Shop” page, EcoDiesel USA advertised several types of tune and tuner products. One type of product offered for sale is an “EZ Lynk” tuner. An EZ Lynk tuner is a physical device that plugs into a vehicle computer system to install tunes. The tuner installs the tunes by using the EZ Lynk cloud computing platform and a smartphone application that connects the EZ Lynk tuner to the EZ Lynk cloud computing platform. EcoDiesel USA has advertised the option to buy an EZ Lynk tuner on three of its products: “2022-2023 Cummins Tuning,” “14-19 EcoDiesel Ezlynk Jeep and Ram Tuner and Tuning only,” and “EZLYNK Tuning.” Otherwise, EcoDiesel offers these three products individually as tunes.

In two of its products, EcoDiesel USA described the purpose of the product as to alter the ECM programming. For example, EcoDiesel USA marketed “20+EcoDiesel Bench Flash” as “[f]ully tuned and unlocked.” In product “14-19 EcoDiesel Bench Flash,” EcoDiesel explained that “[a]ll bench flashes [sic] will be 50hp unless requested higher power.” The details for both products indicate that the products include delete capabilities that would alter the ECM programming of a vehicle or engine.

In some cases, EcoDiesel USA promoted features of its products that defeat or bypass a diesel truck’s exhaust system. For example, four of the products offered for sale described the tuner to provide “notable changes,” including “[d]eceased post to reduce exhaust temperatures and [t]emperature controlled High idle automatically lowered with break application.” The following are names of products that offered “notable changes”: “14-19 EcoDiesel Bench Flash”; “14-19 EcoDiesel Ezlynk Full kit”; “14-19 EcoDiesel Ezlynk Jeep and Ram Tuner and Tuning only”; and “2020-2023 EcoDiesel full kit.” This description indicates that the products operate to defeat the aftertreatment system, which contains the DOC, DPF, and SCR.

From the Agency’s most recent review of the EcoDiesel Website, EcoDiesel USA sold, offered for sale, or caused the offer for sale, at least six different defeat devices that fall within the category of aftermarket software ECM programs. See Table 1, below.

Table 1

Tuning Products – Product Names	
1	EZLYNK Tuning
2	20+ Ecodiesel Bench Flash
3	2022-2023 Cummins Tuning
4	14-19 EcoDiesel Ezlynk Full Kit
5	14-19 EcoDiesel Ezlynk Jeep and Ram Tuner and Tuning only
6	14-19 EcoDiesel Bench Flash

2. Exhaust Aftertreatment Delete Pipes

The second category of defeat devices sold or offered for sale by EcoDiesel USA is exhaust aftertreatment delete pipes. This category includes parts or components that physically replace certified exhaust aftertreatment emission control devices or elements of design, such as the DPF, DOC, and/or SCR, from the exhaust system installed on or in a motor vehicle. EcoDiesel USA advertised for sale at least nine products that fall within this category on its website. The product descriptions include the make and model the product is meant for as well as an image of the product.

From the Agency’s most recent review of the EcoDiesel Website, EcoDiesel USA sold, offered for sale, or caused the offer for sale, at least nine different defeat devices that fall within this category. See Table 2, below.

Table 2

Exhaust Aftertreatment Straight Pipes – Product Names	
1	Stainless Steel 5" Turbo Back Exhaust Pipe for 2013-2018 Dodge Ram 2500 3500
2	4" Exhaust Tube Pipe Kit for 2013-2017 Dodge 2500 3500 6.7L Turbo Diesel
3	5" Exhaust System Down Pipe Back For 01-07 GMC/Chevy Pickup Truck Duramax 6.6L
4	5" Downpipe Back Single Aluminized No Muff 2015.5-2016 GM 2500/3500 6.6L Duramax
5	4" AL Exhaust w/o Muffler for 2008-2010 Ford Powerstroke 6.4L-junior
6	4" Stainless steel Silver Race Exhaust Pipes For 11-16 6.7L Ford F250 F350 F450
7	Stainless Steel 5" Muffler Exhaust Pipes for 2007-2012 Dodge Ram Cummins Diesel
8	14-18 Jeep Grand Cherokee Downpipe
9	14-19 RAM Ecodiesel Down Pipe

3. EGR Delete Parts

The third category of defeat devices sold or offered for sale by EcoDiesel USA is hardware parts or components that physically remove, disable, or bypass one or more components of the EGR system installed on or in a motor vehicle or motor vehicle engine (EGR Delete Parts). EGR Delete Parts replace and remove the EGR valve and cooler system found on newer diesel and gas engines from highway motor vehicles for which they are designed. EGR Delete Parts typically include EGR block off plates and/or intake or exhaust manifolds that do not include an EGR port. EcoDiesel USA advertised for sale at least three products that fall within this category on its website. Specifically, the products are "17-19 GM LSP EGR KIT"; "10-14 6.7 Ram EGR KIT"; and "EcoDiesel plate kit 14-19 for RAM."

The listing of the abovementioned products, as described within each of the three categories, shows a reasonable basis that EcoDiesel USA "offered to sell" (*i.e.*, marketed), or caused the offer to sell, "defeat device" products.

EcoDiesel USA knew or should have known that these products were offered for sale or installed to bypass, defeat, or render inoperative devices or elements of design that control emissions of regulated air pollutants. For example, an EcoDiesel USA representative publicly suggested that they know the defeat design of their products but explained that their product descriptions are vague to avoid potential legal risks. Moreover, in the comments section of the YouTube video "Deleted Ecodiesel Dyno Results," user handle @coachluke85 asked, "Looking at your store, it says that everything is included. What is 'everything'? DPF delete? EGR delete? Transmission tuning? Thanks!" User handle @recklessmotorsportsusa3443 responded, "You can't legally post that info that's why it says everything." A screenshot of this conversation is provided in Appendix A.

Additionally, on the EcoDiesel Website, the page entitled "Helpful Links and Videos" instructs prospective customers to watch two hyperlinked videos before contacting the business. (Available at: <https://www.ecodieselusa.com/how-to-use-the-alientech-pg3>). The first link directs users to a video entitled "CFT plate kit install." The hyperlinked video was posted by the RecklessMotorSportsUSA YouTube account. The published video explains the process for installing the EGR delete parts.²² The

²² RecklessMotorsportsUSA, CFT Plate Kit Install (Aug. 7, 2021), <https://www.youtube.com/watch?v=agLrzTAH8lc>.

second hyperlinked video is entitled "DPF Removal Video." This video directs users to a video entitled "How To: Installing Flo-Pro Delete Pipes on Ram EcoDiesel."²³ The video was posted on the YouTube channel "Dark Iron Diesel," user handle "@darkirondiesel." The video describes the process of installing a delete pipe on a Ram vehicle with an EcoDiesel diesel engine, including how to remove and reinstall the ECM.

Accordingly, EcoDiesel USA knew or should have known that these products were offered for sale, sold, or installed to bypass, defeat, or render inoperative elements of design that control emissions of regulated air pollutants, based upon EcoDiesel USA's representation as a custom tune designer, EcoDiesel USA's promotion for its services, EcoDiesel USA's direction to YouTube videos on how to remove emission control equipment and install delete hardware, and EcoDiesel USA's informational resources about the operation and intended effect of its products on its websites.

Furthermore, EcoDiesel USA knew or should have known that these defeat device products were offered for sale or installed on "motor vehicles" or "motor vehicle engines." The defeat device products sold or offered for sale, by EcoDiesel USA were designed specifically for the makes and models of Dodge Ram, General Motors, Ford Motor Company, Fiat Chrysler Automobiles, and Cummins vehicles or engines. Dodge Ram, General Motors, Ford Motor Company, Fiat Chrysler Automobiles, and Cummins sought and obtained COCs from the EPA for their motor vehicles or engines. This certification unequivocally demonstrates that these vehicles and engines are "motor vehicles" and "motor vehicle engines" under the Act.

For all of these reasons, EcoDiesel USA knew or should have known that they sold, offered for sale, or installed parts or components for motor vehicles or motor vehicle engines with a principal effect of bypassing, defeating, or rendering inoperative devices or elements of design that control emissions of regulated air pollutants.

Enforcement

The EPA may bring an enforcement action for these violations, and other violations it identifies, under its administrative authority or by referring this matter to the United States Department of Justice with a recommendation that a civil complaint be filed in federal district court.²⁴ Persons violating Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B), are subject to an injunction under Section 204 of the Act, 42 U.S.C. § 7523, and a civil penalty of up to \$5,761 for each violation.²⁵ Each part or component manufactured, sold, offered for sale, or installed in violation of Section 203(a)(3)(B) is a separate violation. 42 U.S.C. § 7524(a).

Note that the EPA has not completed its investigation to identify and catalogue every Defeat Device sold or offered for sale by EcoDiesel USA. The Agency retains the authority to investigate other possible violations and our investigation of EcoDiesel USA's compliance status with the CAA continues. Simultaneously with this Notice of Violation, the Agency is issuing a request for information to

²³ Dark Iron Diesel, How to: installing Flo-Pro delete pipes on Ram Ecodiesel (Feb. 21, 2020), <https://www.youtube.com/watch?v=OdZ8qLkUGYs>.

²⁴ CAA §§ 204 and 205, 42 U.S.C. §§ 7523, 7524.

²⁵ CAA § 205(a), 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4.

EcoDiesel USA pursuant to Sections 114(a)(1) and 208(a) of the CAA, 42 U.S.C. § 7414(a)(1) and 7542(a), to obtain sales and other information regarding the tunes identified in this Notice of Violation as well as information regarding additional products EcoDiesel USA has sold or offered for sale.

The EPA requests that You immediately cease sale of all parts, tunes, or components capable of defeating, bypassing, or rendering inoperative any emission control systems or elements of design of motor vehicles. Please provide the statement below, signed by an authorized company official within 14 calendar days of receipt of this Notice of Violation Failure to timely comply with this request may delay or otherwise impede a final resolution in this manner.:

I hereby certify that, as of [DATE], all employees of EcoDiesel USA, were instructed not to sell any parts, tunes, or components capable of defeating, bypassing, or rendering inoperative any emission control systems or elements of design on motor vehicles and, to the best of my knowledge and belief, EcoDiesel USA, has not manufactured or sold, or offered to sell, or installed any such parts since [DATE].

Please provide the requested certification, via courier service or overnight delivery to:

Ian Altendorfer
Attorney-Adviser
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
William Jefferson Clinton Federal Building, Room 1142-C
Washington, D.C. 20460

The EPA is available to discuss this matter with you in further detail upon your request. Please contact Ian Altendorfer, an EPA attorney assigned to this matter, within 14 days of receipt of this Notice of Violation. Mr. Altendorfer can be reached at (202) 564-6032 or altendorfer.ian@epa.gov.

Sincerely,

MARY
GREENE

Digitally signed by MARY
GREENE
Date: 2024.08.13
11:29:23 -04'00'

Mary E. Greene
Director, Air Enforcement Division
Office of Civil Enforcement

Enclosures (2):
Information Request Letter
Appendix F Excel Workbook

Appendix A

Screenshots of Comments Posted on YouTube video "Deleted Ecodiesel Dyno Results,"
<https://www.youtube.com/watch?v=SJd8eVkRDyw> (last accessed on July 18, 2024)

 **@loganhubbard3177** 3 years ago
@recklessmotorsportsusa3443 I would be interested in this tune ? Sorry if it's been answered. I would like to get this in my truck

  Reply

 **@recklessmotorsportsusa3443** 3 years ago
www.recklesstx.com/shop or email me at randy@recklesstx.com and we can talk

  Reply

 **@codytabor3685** 2 years ago
Does ur tune turn off **def** fluid

 1  Reply

 • 1 reply

 **@recklessmotorsportsusa3443** 2 years ago
Sales@ecodieselusa.com

  Reply

 **@timhall5226** 3 months ago
I also have a 2018 Laramie ED engine knocking bottom end. Went out at 55k miles. No warranty and want to keep the truck if possible. Can you contact me please. Not having any luck on the website.

   Reply

 • 1 reply

 **@recklessmotorsportsusa3443** 3 months ago
I'm only one person haven't gone through the emails from last 2-3 days been moving

  Reply

 **@coachluke85** 2 years ago
Looking at your store, it says that everything is included. What is "everything"? DPF delete? EGR delete? Transmission tuning? Thanks!

  Reply

 **@recklessmotorsportsusa3443** 2 years ago
You can't legally post that info that's why it says everything

 1  Reply

CERTIFICATE OF MAILING

I, Victor Aguilar, certify that on this day I sent this Notice of Violation for noncompliance with the Clean Air Act, by Certified Mail, return receipt requested, to:

Randy Ziegelbauer
215088 Scout Road
Mosinee, Wisconsin 54455

And I emailed the Request for Information to the email address:

sales@ecodieselusa.com

Date: 08/13/2024



Victor Aguilar
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
William J. Clinton Federal Building
Room 2224J, Mail Code 2242A
Washington, DC 20460

