

EPA OECA Air Enforcement Division
INSPECTION REPORT

Inspection Date(s):	04/06/2023		
Media:	Air		
Regulatory Program(s)	Title II Mobile Sources		
Company Name:	Medway Imports		
Facility Name:	Medway Imports Flint Storage Facility		
Facility Physical Location:	3337 Lapeer Rd., Flint, MI 48503		
(city, state, zip code)			
Mailing address:	3337 Lapeer Rd., Flint, MI 48503		
(city, state, zip code)			
County/Parish:	Genesee County		
Facility Contact:	Alanna Heagle	Operations Manager	
FRS Number:	N/A		
Identification/Permit Number:			
Media Number:	N/A		
NAICS:	N/A		
SIC:	N/A		
Facility Representatives:	Alanna Heagle	Operations Manager	810-422-9735
EPA Inspectors:	Mario Jorquera	OECA/OCE/AED/VEEB	202-564-1079
	{name}	{affiliation/mailcode}	{phone no.}
State Inspector(s):	{name}	{affiliation/mailcode}	{phone no.}
	{name}	{affiliation/mailcode}	{phone no.}
Other Inspector(s):	Brodie Mack	NHTSA	202-366-6089
	Kim Childers	NHTSA	202-366-2820
Metadata	Title:	Medway Imports Inspection; Flint, MI	
	Author:	Mario Jorquera	
	Subject:	Inspection of Potentially Uncertified Mexican Dodge Chargers imported into the U.S.	
	Keywords:	Inspection Report, Vehicle and Engine, Dodge Chargers, Mexico	
EPA Lead Inspector Signature/Date	MARIO JORQUERA	Digitally signed by MARIO JORQUERA Date: 2023.09.07 12:13:14 -04'00'	
	{Inspector name}		Date
Supervisor Signature/Date	MARK PALERMO	Digitally signed by MARK PALERMO Date: 2023.09.07 14:13:04 -04'00'	
	{Supervisor name}		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

At the request of managers from the National Highway Traffic Administration (NHTSA), on April 6, 2023, EPA HQ Air Enforcement Division, Vehicle and Engine Branch inspector Mario Jorquera joined NHTSA inspectors at the premises of Medway Imports (Medway) in Flint, Michigan for an unannounced inspection of a number of vehicles at their facility. NHTSA had intelligence that suggested some 22 Dodge Charger sedans at this facility were claimed as being Canadian despite the fact that they had been built for sale in Mexico. The role of the EPA inspector was to check the vehicles for evidence of compliance with EPA requirements and to help determine if the vehicles were truly Mexican and thus ineligible for importation as Canadian vehicles, which have emission control requirements identical to U.S. vehicles.

FACILITY DESCRIPTION

The Medway Imports facility consists of an office building and a surrounding gravel parking lot with a large number of cars. The lot had a tall chain-link fence around it. Medway specializes in importing vehicles from Canada for sale and use in the United States. Medway has two facilities: one in Medway, MA and the other in Flint, MI. Medway is a Registered Importer (RI) under NHTSA regulations and makes changes to the Canadian vehicles to meet US. Laws. The changes may include changing the speedometers, lights and glass.

As this was an inspection primarily directed by NHTSA, the EPA inspector had little contact with facility personnel. Rather, the EPA inspector spent his time examining the vehicles at issue in the gravel lot of the facility.

All vehicles inspected were Model Year (MY) 2020 Dodge Charger sedans manufactured at Fiat Chrysler Automobiles' (FCA's) Brampton Assembly Plant in Ontario, Canada. All vehicles were white and were powered by 5.7 liter V8 engines.

The facility operates 5 days a week from 8:00am to 5:00pm. It is closed on weekends.

Section II - OBSERVATIONS

Inspector Mario Jorquera proceeded to inspect the Dodge Chargers at the facility. The inspection consisted of observing and photographing all the labels on each vehicle, including the EPA Vehicle Emission Control Information (VECI) label in the engine compartment and the DOT label on the end of the driver's side door of the vehicles. Inspector Jorquera also photographed warning labels such as on the sun visors of each vehicle. Mr. Jorquera also checked the owner's manuals in several vehicles. As an additional test, Mr. Jorquera obtained Onboard Diagnostic (OBD) data from two of the vehicles to determine its consistency with EPA-certified OBD parameters. Mr. Jorquera also checked the underside of several vehicles to ensure that emission control components such as catalytic converters were present.

Inspections at the Gravel Parking Lot:

Inspection #	1
--------------	---

Date	4/6/23
Inspection Photos	3568-3580 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT3LH213030
Equipment Build Date	July 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	2
Date	4/6/23
Inspection Photos	3581-3592 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT9LH215686
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	3
Date	4/6/23
Inspection Photos	3593-3604 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT8LH213086
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	4
Date	4/6/23
Inspection Photos	3605-3612 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT9LH215610
Equipment Build Date	July 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	5
Date	4/6/23
Inspection Photos	3613-3620 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT5LH219346
Equipment Build Date	July 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	6
Date	4/6/23
Inspection Photos	3621-3628 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT7LH213080
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	7
Date	4/6/23
Inspection Photos	3629-3636 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT9LH219382
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	8
Date	4/6/23
Inspection Photos	3637-3644 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT7LH212964
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	9
Date	4/6/23
Inspection Photos	3645-3652 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT4LH212968
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	10
Date	4/6/23
Inspection Photos	3653-3660 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT8LH212908
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	11
Date	4/6/23
Inspection Photos	3661-3668 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT8LH215677
Equipment Build Date	August 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	12
Date	4/6/23
Inspection Photos	3669-3678 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT9LH213095
Equipment Build Date	October 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	13
Date	4/6/23
Inspection Photos	3679-3694 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT5LH215667
Equipment Build Date	July 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	14
Date	4/6/23
Inspection Photos	3686-3694 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT6LH2113023
Equipment Build Date	July 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	15
Date	4/6/23
Inspection Photos	3695-3701 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT6LH215600
Equipment Build Date	September 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	16
Date	4/6/23
Inspection Photos	3702-3706 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT6LH212969
Equipment Build Date	Not noted
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	17
Date	4/6/23
Inspection Photos	3707-3715 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCT7LH215685
Equipment Build Date	July 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

Inspection #	18
Date	4/6/23
Inspection Photos	3716-3727 (Canon)
Inspector	Mario Jorquera
Type of equipment	Highway Motor Vehicle (Sedan)
Brand	Dodge
Equipment Manufacturer	Fiat Chrysler Automobiles N.V.
Model	Charger
VIN	2C3CDXCTXLH215633
Equipment Build Date	August 2020
ECI Label	Under hood
Company on ECI	FCA US LLC
TGN	LCRXV03.65P3
Emission Controls listed	HO2S, SFI, TWC
Engine Build Date	2020MY
Fuel	Gasoline
EPA Regs Certified to	40 C.F.R 40/Chapter-I/Subchapter-C/part-86
Emission Controls Observed	TWC
Used or New?	Used
Imported?	Yes

As shown above, 18 vehicles were examined by inspector Mario Jorquera. This was the extent of the inspections conducted at the Medway Imports facility in Flint. Inspector Jorquera also obtained data from the Onboard Diagnostic (OBD) system of two of the vehicles by means of a data logger. The last five digits of the VIN for the two vehicles scanned for OBD data at Medway's facility were 213086 and 215686. The data obtained from these scans is shown in the table 1, below:

Table 1: Analysis of Data Obtained from Scans of Vehicle OBD Systems

	VIN	File	VIN 10th digit	Chassis MY	Local Log Start Time	Supported Controllers	Protocol	Engine Family (Mode 9, PID 13)	OBD Compliance (Mode 1, PID 1C)
1	2C3CDXCT8LH213086	3D06134 8.IOS	L	2020	4/6/23 9:48 AM	E8, E9	J1979	LCRXV05.75P5	Hex Value = 1*
2	2C3CDXCT9LH215686	3D06140 3.IOS	L	2020	4/6/23 10:03 AM	E8, E9	J1979	LCRXV05.75P5	Hex Value = 1*

* OBD Compliance Value of 1 = California-only (including other "CAA Sec. 177" states) OBD II certified systems. "Certified to California OBD II" should only be included if the actual test group is intended for certification by CARB. The EPA Test Group Name is listed if it was reported under Mode 9 and OBD compliance from Mode 1.

Section III – AREAS OF CONCERN

Upon importing these vehicles, Medway declared them to be admissible under Code FF in EPA's 3520-1 declaration form for motor vehicles. Code FF is for Canadian "identical" models imported for resale or lease. In using this code, the importer must demonstrate that the vehicles are truly Canadian by means of Canadian emission control labels, registrations or titles, or a letter from the vehicles' manufacturer that the vehicle is identical to a U.S. EPA certified version with respect to emissions. The importer is also required to satisfy all labeling, warranty and CAFE requirements as specified by EPA.

NHTSA informed inspector Jorquera that Medway had provided a letter from the manufacturer indicating that the vehicles were built for the Canadian market. However, FCA representatives denied that the letter had originated with them. The vehicles Inspector Jorquera examined had no labels that suggested they were Canadian. In fact, all of the labels that were obviously installed by the manufacturer were in Spanish, including the tire and load limit labels, the airbag warnings on the sun visors and the owner's manuals. There were several labels that appeared to be installed by Medway, including the EPA VECI labels under the hood, the Canadian certification labels, the DOT tire safety label and the DOT Federal Motor Vehicle Safety Standards (FMVSS) compliance labels.

Inspector Jorquera observed that the labels installed by Medway were of very poor quality when compared to those installed by the Original Equipment Manufacturer (OEM). Medway's labels had poor print quality and easily peeled off. In addition, several Medway labels were obviously placed over other (presumably OEM) labels that had been removed. The Medway labels also had obvious errors that an OEM would never make. For example, the FMVSS labels required by DOT listed the date of manufacture of each vehicle, but the months listed on the label had no relationship to the serial numbers at the tail end of each vehicle's Vehicle Identification Number (VIN). These discrepancies are shown in the Table 2:

Table 2: Comparison of vehicle serial number and month of manufacture

Last 6 Digits of VIN (in ascending order)	Claimed month of manufacture in 2020
202908	September
212964	September
212968	September
213023	July
213030	July
213080	September
213086	September
213095	October
215600	September
215610	July
215633	August
215667	September
215677	August
215685	July
215686	September
219346	July
219382	September

OEMs assign the serial number portion of VINs in a sequential manner. So, it is impossible that the vehicle with VIN 2C3CDXCT6LH215600 was built in September while the one with VIN 2C3CDXCT9LH215610 was built in July. Clearly, these labels were crafted with no attention to the regulatory requirement to provide accurate dates. Another problem with the labels required by DOT is that the tire safety label indicates the vehicle is a "Multipurpose Vehicle", whereas the Dodge Chargers are clearly passenger cars (Both definitions are in DOT regulations at Title 49, Subtitle B, Chapter V, Part 571).

Similar problems occur with the EPA VECI labels installed under the hood of all inspected vehicles had the EPA Test Group Name LCRXV03.65P3, yet indicated the engines were 5.7 liter V8 engines. This label has an internal inconsistency that OEM labels would be unlikely to have, and does not correspond to the label that FCA included in its application for a Certificate of Conformity (COC) for MY 2020 Dodge Chargers equipped with their 5.7 liter engines for sale in the U.S. and Canada. The LCRXV03.65P3 Test Group Name is only for FCA's 3.6 liter V6 engine. FCA's 5.7 liter engine has Test Group Name LCRXV05.75P5, and this was the number

reported by the OBD system in the three Medway cars tested. Accordingly, it is evident that the VECI labels installed in the inspected vehicles did not correspond to those vehicles.

Based on the evidence discussed above, inspector Jorquera believes all of the Medway vehicles he examined were manufactured in Canada for the Mexican market, and, as such, are not Canadian vehicles. Even if these vehicles were Canadian vehicles, Medway does not meet the requirements necessary to use Code FF in the EPA 3520-1 declaration form as a rationale for claiming the vehicles are eligible for importation because the VECI labels used on all vehicles correspond to a different engine configuration than that with which they are equipped.

Section IV – FOLLOW UP

EPA will be following up with Medway to discuss resolving any possible violations triggered when all of these vehicles were imported into the U.S.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 160 photos taken on 04/06/2023 with the Cannon camera (IMG_3568-IMG_3727.JPG)

Appendix 2 -- COC Application for TGN LCRXV03.65P3.pdf

Appendix 3 – COC Application for TGN LCRXV05.75P5.pdf