

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	06/26/2024	
Media Program:	Pesticides	
Regulatory Program(s)	FIFRA	
Company Name:	3PL Fulfillment & Prep LLC	
Facility Name:	3PL Fulfillment & Prep	
Facility Physical Location:	11094 Grader St	
(city, state, zip code)	Dallas, TX 75238	
Mailing address:	533 Highland Fairway Ln	
(city, state, zip code)	Wylie, TX 75098-5553	
County/Parish:	Dallas	
Facility Phone Number	(469) 927-6177	
Facility Contact:	Mohammed Kamran	Owner
	info@3plfulfillmentprep.com	
FRS Number:	n/a	
Identification/Permit Number:	n/a	
Media Identifier Number:	n/a	
NAICS:	4931	
SIC:	4225	
Personnel participating in inspection:		
Justin Mullenix	EPA-ECDST	Lead Inspector
Kiera Hancock	EPA-ECDST	Inspector
Sidrah Khan	EPA-LCRPP	Subject Matter Expert
Stephen Angle	EPA-LCRPP	Subject Matter Expert
Mohammed Kamran	3PL Fulfillment & Prep	Owner
Fuadd M. Siddiqui	3PL Fulfillment & Prep	Warehouse Manager
EPA Lead Inspector Signature/Date	JUSTIN MULLENIX Digitally signed by JUSTIN MULLENIX Date: 2024.08.21 11:51:49 -05'00'	
	Justin Mullenix	Date
Supervisor Signature/Date	H STUCKEY Digitally signed by H STUCKEY Date: 2024.08.22 11:31:12 -05'00'	
	H. Troy Stuckey, PhD	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

This for-cause scheme marketplace establishment inspection was conducted pursuant to the Federal, Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 9(a), 7 U.S.C. §136g(a), to evaluate compliance with FIFRA and the regulations thereunder.

The inspection occurred for-cause for suspected distribution or sale of a counterfeit (misbranded) pesticidal device, Sub-Zero Water Filter, that was subject to an import Notice of Refusal by EPA Region 9. 3PL Fulfillment & Prep LLC was identified as the consignee of this import.

FACILITY DESCRIPTION

3PL Fulfillment & Prep LLC is a company incorporated and operating a single facility in Dallas, Texas, that specializes in the warehousing, packaging, and distribution of general merchandise for third-party retailers operating online. The size of the business is unknown.

Section II – OBSERVATIONS

I, EPA Region 6 Inspector Justin Mullenix, along with Inspector Kiera Hancock, and pesticide import subject matter experts Sidrah Khan and Stephen Angle, arrived at 3PL Fulfillment & Prep LLC on June 26, 2024, at approximately 9:55 AM. Upon entering the facility, we met Fuaad M. Siddiqui, warehouse manager of 3PL Fulfillment & Prep LLC. Inspectors Hancock and I presented Mr. Siddiqui our EPA inspector credentials and explained the purpose of our visit. We asked Mr. Siddiqui if an office or conference room was available, and we were led to a conference room. I then presented Mr. Siddiqui a Notice of Inspection (EPA Form 3540-2) which he and I signed (Appendix 1).

I informed Mr. Siddiqui of the EPA Region 9 Notice of Refusal associated with the Sub-Zero Water Filter pesticidal device and inquired if 3PL Fulfillment & Prep LLC was in possession of the product. Mr. Siddiqui stated that he was unaware of the product but explained that several brands of water filters have been distributed by the company and offered to search the warehouse for the product. We obliged Mr. Siddiqui to perform a search, which he left the conference room to do. After a short while, Mr. Siddiqui returned to the conference room with four different models of water filters; however, none were confirmed to be the Sub-Zero Water Filter. We were then joined by Mohammed Kamran, the owner of 3PL Fulfillment & Prep LLC. While the other EPA staff members evaluated the water filters for compliance, I asked Mr. Kamran about 3PL Fulfillment & Prep LLC and how it operates. Mr. Kamran explained that the company operates as a warehousing and packaging facility on behalf of third-party online retailers. He explained that as orders come in, the company retrieves and packages products to then be sent to customers, and that products held in inventory vary over time.

After concluding the opening meeting, I asked Mr. Kamran if the EPA staff members and I could walk through the facility to evaluate products for compliance with FIFRA. Mr. Kamran agreed, so the EPA staff members and I began at the front of the facility where a variety of products were on display. We reviewed and photographed several products before making our way to the warehouse section of the facility. We walked through the aisles of the warehouse reviewing and photographing additional products before making our way back to the conference room.

Upon returning to the conference room, I asked Mr. Siddiqui some follow up questions regarding certain products. I then prepared a Receipt for Samples (EPA Form 3540-3) which Mr. Siddiqui and I signed (Appendix 2). Mr. Siddiqui was then provided a copy of the Notice of Inspection and Receipt for Samples, along with an EPA Small Business Resources information sheet. The inspection concluded at approximately 11:12 AM.

Section III – AREAS OF CONCERN

The areas of concern identified during the inspection included potential distribution or sale of unregistered or misbranded pesticides or pesticidal devices.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the facility on June 26, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Notice of Inspection (EPA Form 3540-2)

Appendix 2 – Receipt for Samples (EPA Form 3540-3)

Appendix 3 – Photograph Log – 35 photographs taken on June 26, 2024

Appendix 1

Notice of Inspection



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection

Office of Enforcement and Compliance Assurance

Facility Name 3PL Fulfillment and Prep

Facility Address
11094 Erader St., Dallas, TX 75238

Name of Facility Official
FUAAD M. SUDDIQU

Title
W/H MANAGER

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

Facility Official's Signature:

Authority for Inspection

For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale [FIFRA § 9(a) (7 U.S.C. § 136g)]; and for the purpose of inspecting and obtaining copies of those records specified in FIFRA § 8 (7 U.S.C. § 136f) and 40 C.F.R. Part 169.

Reasons for Inspections (Check applicable boxes)

☐ Routine Inspection

Violation

☒ For Cause Inspection

Suspected:

Counterfeit Pesticidal Device

Additional Information:

Name of Inspector Justin Mullerix

Signature of Inspector

Date 6/26/24

Title Life Scientist

Time 9:57 AM

Address EPA Region 6, 1201 Elm St, Dallas, TX 75270

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.

Appendix 2

Receipt for Samples



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Receipt for Samples

Office of Enforcement and Compliance Assurance

Facility Name *3PL Fulfillment and Prep*

Facility Address
11094 Grader St., Dallas, TX 75238

Name of Facility Official
Fuad M. Siddiqui

Title
W/H Manager

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

06262024 - 08750731430001027713 - 01 - 01: 35 photographs.

☐ Duplicate samples requested and provided ☒ Duplicate samples not requested Amount paid ☐ Cash ☐ Credit Card ☒ No Charge

Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature

Date *6/26/24*

Name of Inspector *Justin Mullenix*

Title *Life Scientist*

Signature of Inspector

Date *6/26/24*

Address *1201 Elm St, Dallas, TX 75270*

Appendix 3

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260121.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:20 AM

Photographer: Kiera Hancock

Description: LG Water Filter side 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

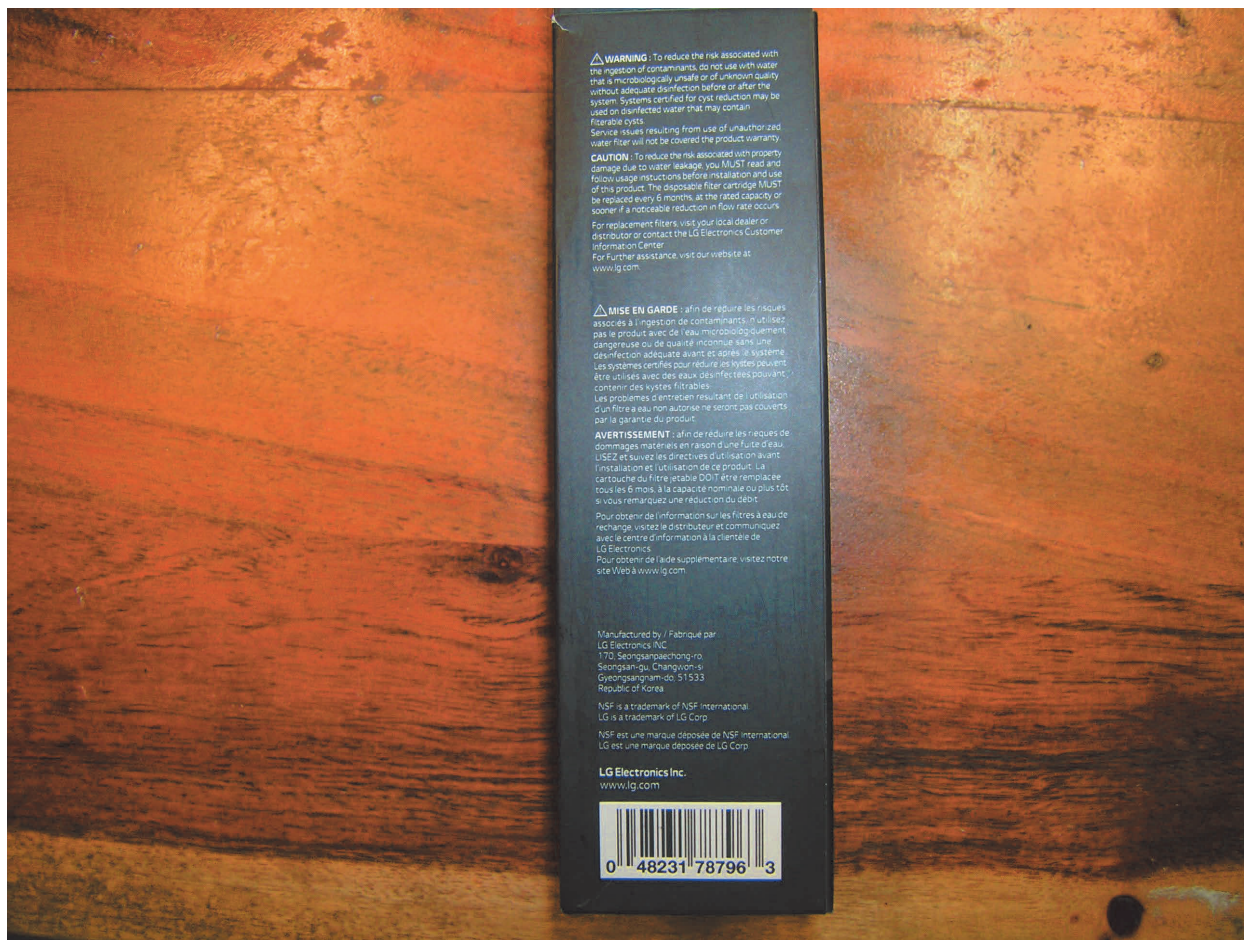


Photo File Name: P6260123.jpg
Date of Photo: 06/26/2024
Time of Photo: 10:20 AM
Photographer: Kiera Hancock
Description: LG Water Filter side 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260125.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:20 AM

Photographer: Kiera Hancock

Description: LG Water Filter side 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260129.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:22 AM

Photographer: Kiera Hancock

Description: LG Water Filter side 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260130.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:22 AM

Photographer: Kiera Hancock

Description: LG Water Filter side 4 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260131.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:22 AM

Photographer: Kiera Hancock

Description: LG Water Filter side 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260132.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:22 AM

Photographer: Kiera Hancock

Description: LG Water Filter side 5 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260136.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:28 AM

Photographer: Kiera Hancock

Description: Bioadvanced Rose & Flower Care side 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260137.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:28 AM

Photographer: Kiera Hancock

Description: Bioadvanced Rose & Flower Care side 1 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260138.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:28 AM

Photographer: Kiera Hancock

Description: Bioadvanced Rose & Flower Care side 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260139.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:28 AM

Photographer: Kiera Hancock

Description: Bioadvanced Rose & Flower Care side 2 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260140.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:28 AM

Photographer: Kiera Hancock

Description: Bioadvanced Rose & Flower Care side 2 (3)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

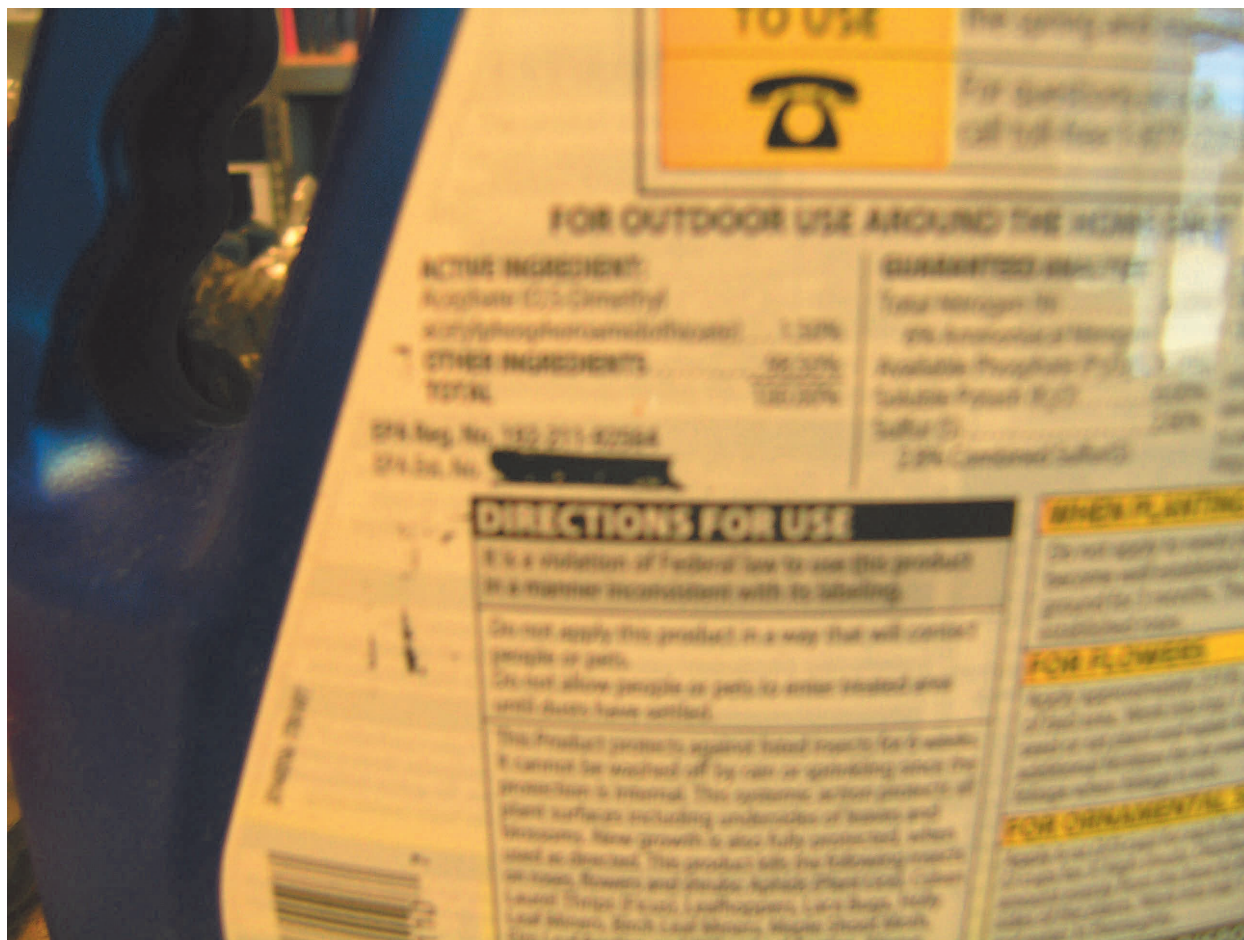


Photo File Name: P6260141.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:29 AM

Photographer: Kiera Hancock

Description: Bioadvanced Rose & Flower Care side 2 (4)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260142.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:30 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260143.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:30 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260144.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:31 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

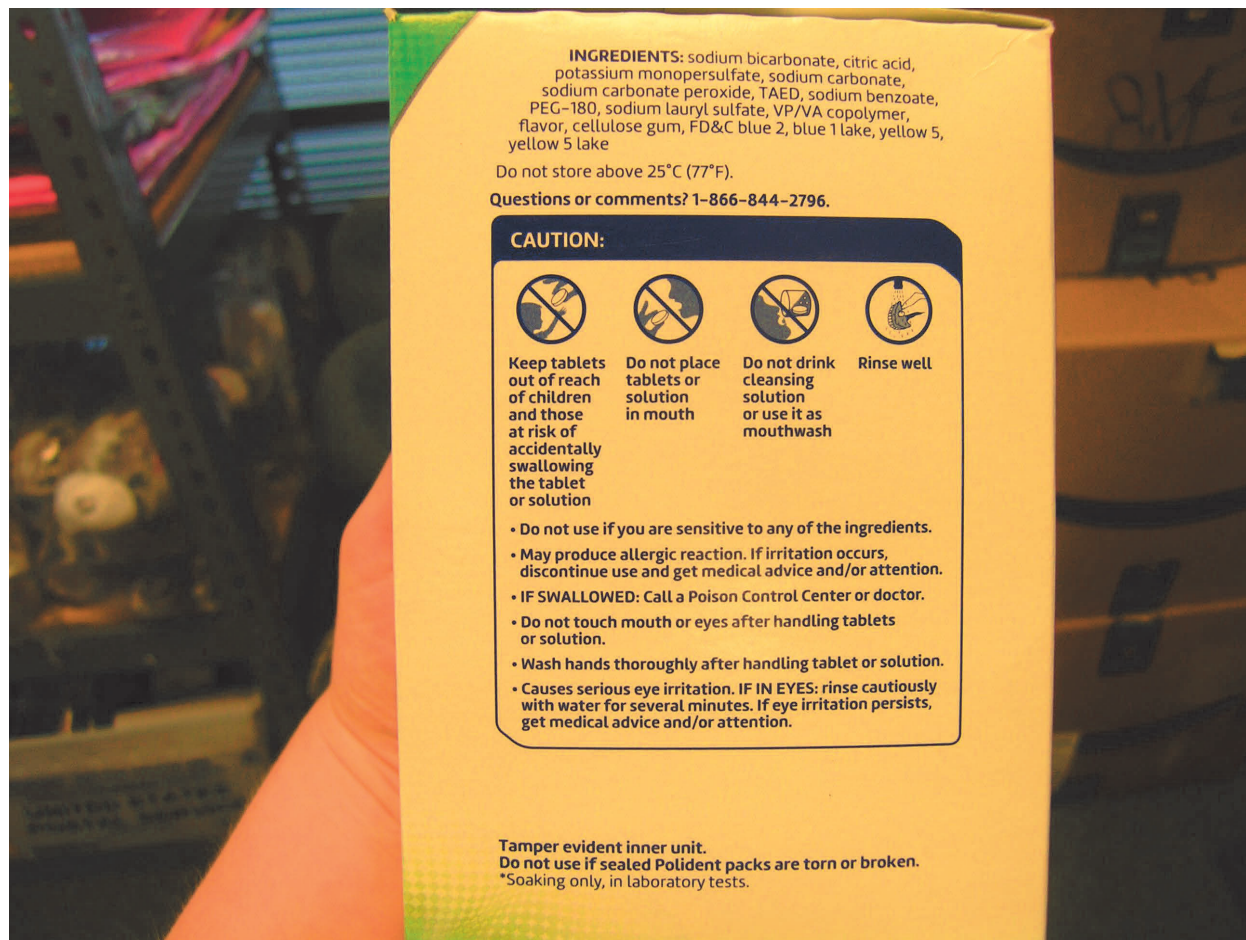


Photo File Name: P6260145.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:31 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

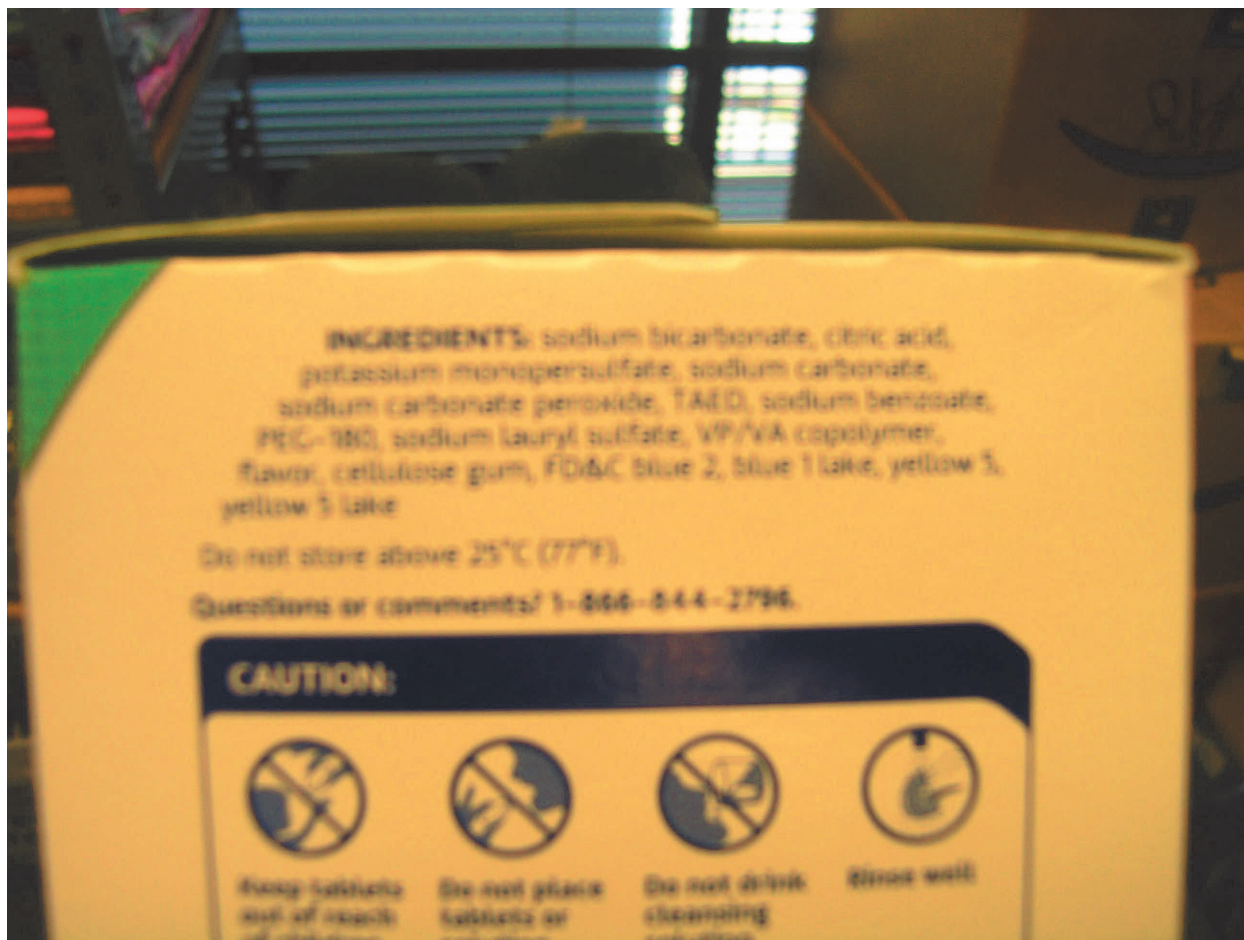


Photo File Name: P6260146.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:31 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 4 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

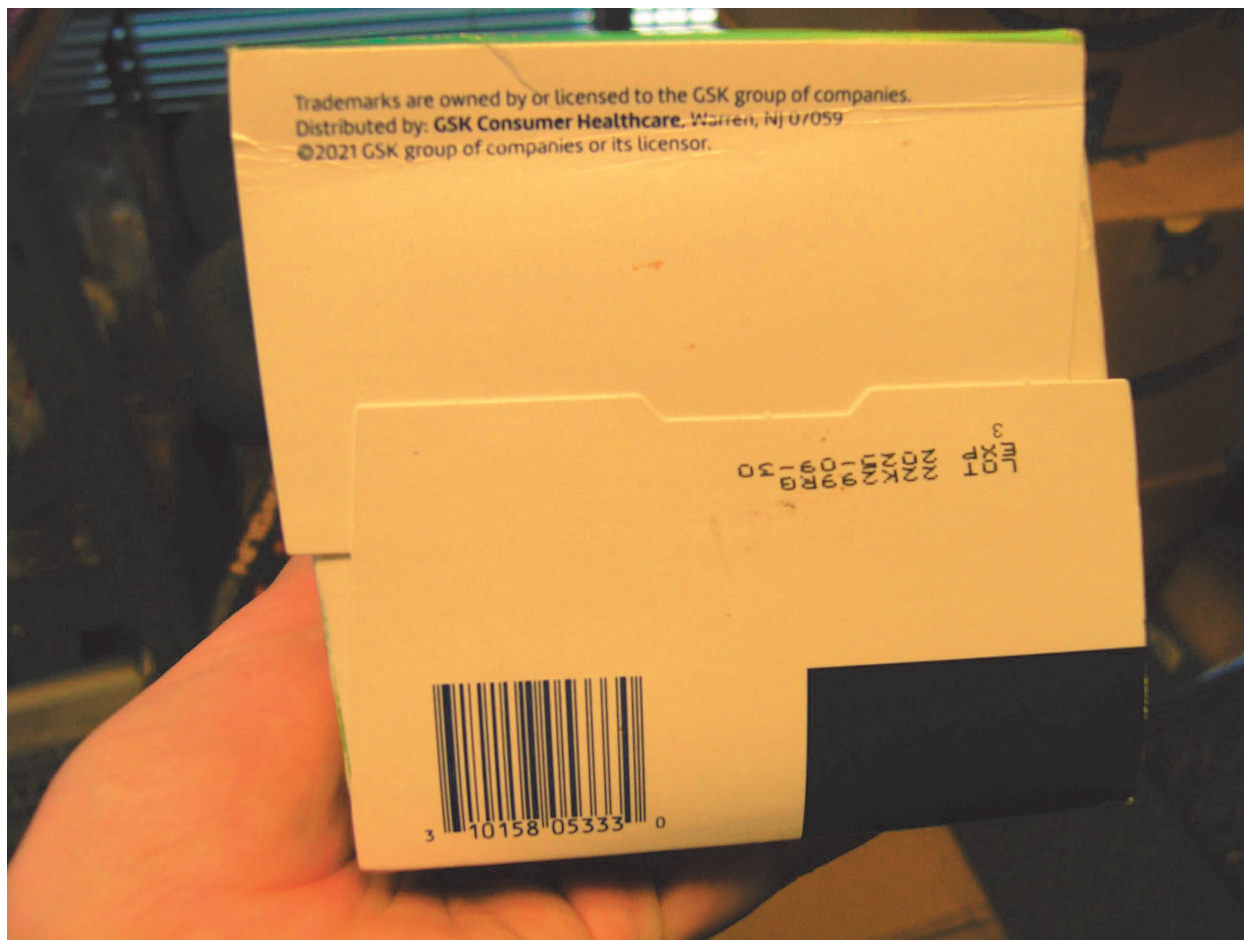


Photo File Name: P6260147.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:31 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260149.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:31 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260150.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:31 AM

Photographer: Kiera Hancock

Description: Polident Antibacterial Denture Cleanser side 1 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260151.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:38 AM

Photographer: Kiera Hancock

Description: 3PL Fulfillment & Prep warehouse



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260152.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260153.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 1 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260154.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260155.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 2 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

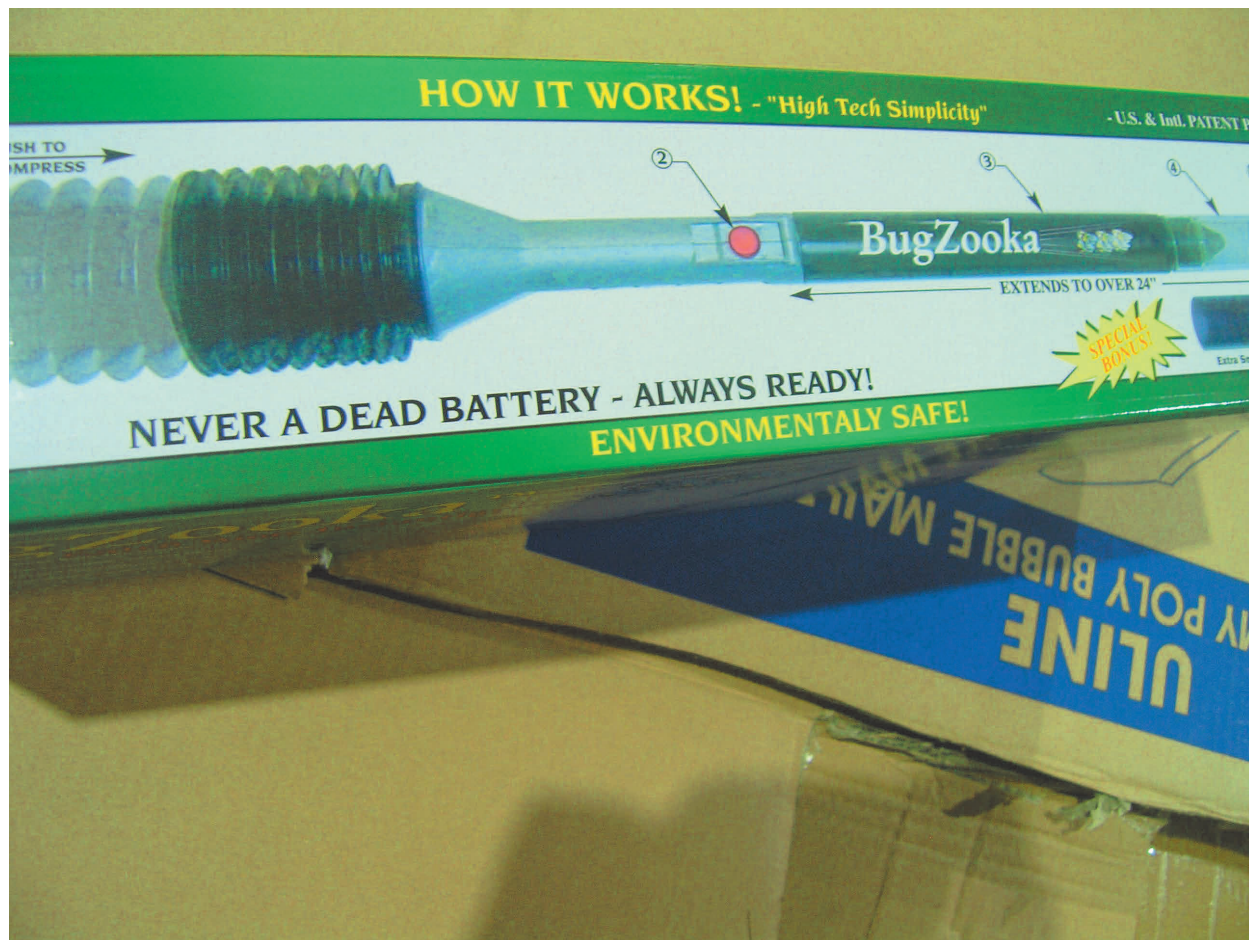


Photo File Name: P6260156.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 2 (3)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260157.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260158.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260159.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:42 AM

Photographer: Kiera Hancock

Description: BugZooka side 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260160.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:43 AM

Photographer: Kiera Hancock

Description: BugZooka side 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX

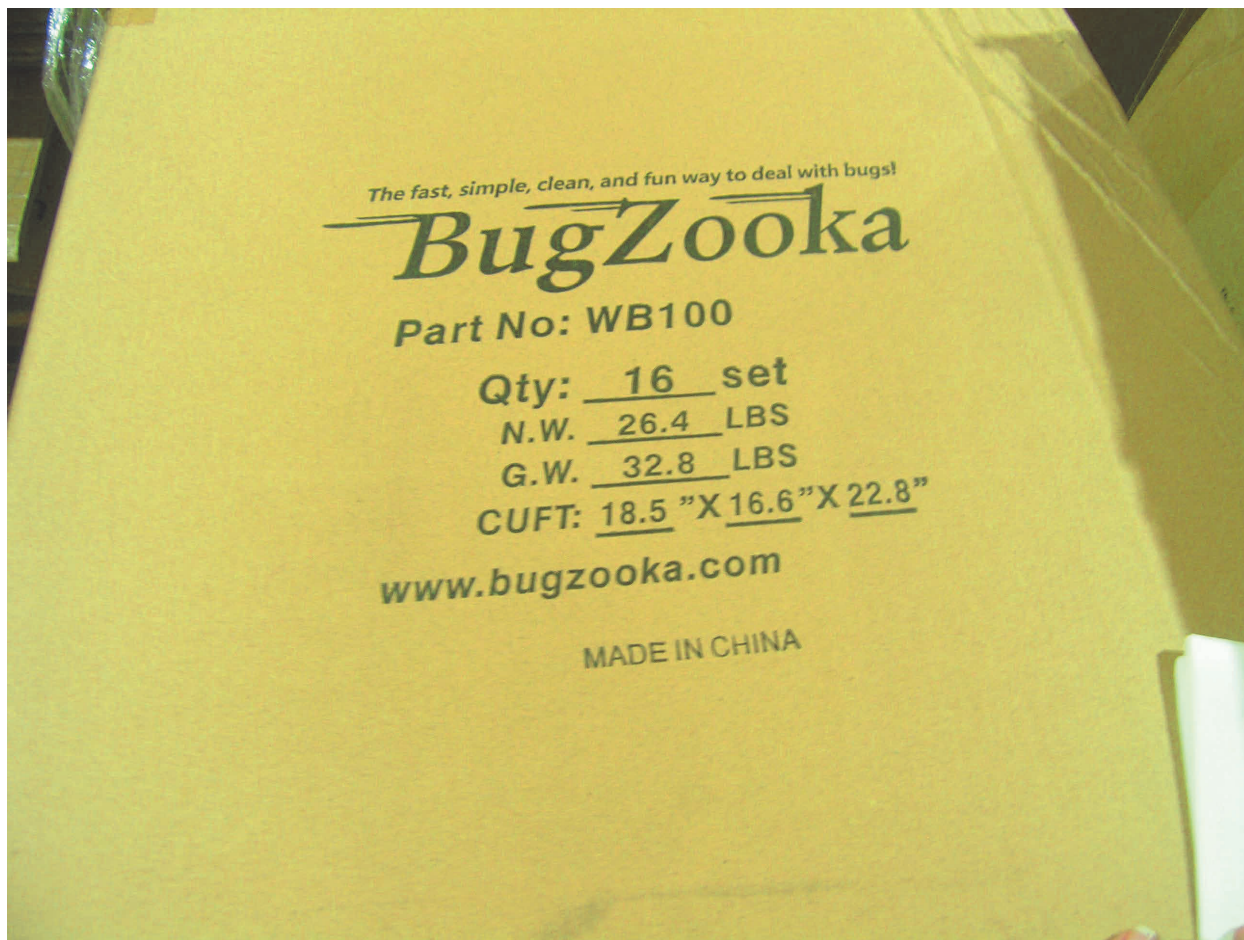


Photo File Name: P6260161.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:43 AM

Photographer: Kiera Hancock

Description: BugZooka box label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260162.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:48 AM

Photographer: Kiera Hancock

Description: Advantage 20X Citrus Multi-Purpose Cleaner side 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260163.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:48 AM

Photographer: Kiera Hancock

Description: Advantage 20X Citrus Multi-Purpose Cleaner side 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: 11094 Grader St		
City: Dallas	County/Parish: Dallas	State: TX



Photo File Name: P6260165.jpg

Date of Photo: 06/26/2024

Time of Photo: 10:50 AM

Photographer: Kiera Hancock

Description: LG Water Filter box