



OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

WASHINGTON, D.C. 20460

September 30, 2024

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

and

VIA ELECTRONIC MAIL:
partners@spelabautoparts.com

ATTENTION TO:

Oliver George, Partnership Manager
SPELAB
18275 Fullerton Rd.,
City of Industry, CA 91748

**Request for Information Under Sections 114(a)(1) and 208(a) of the Clean Air Act,
42 U.S.C. §§ 7414(a)(1) and 7542(a)**

The United States Environmental Protection Agency ("EPA") hereby requires SPELAB Auto Parts, and any of its parent organizations, affiliated organizations, predecessors, successors, or assignees, including but not limited to Hangzhou Weihong Technology Co., Ltd. (collectively "You" or "SPELAB")¹ to provide the information requested below.

EPA issues this Information Request under Sections 114(a)(1) and 208(a) of the Clean Air Act ("CAA"), 42 U.S.C. §§ 7414(a)(1) and 7542(a). Under Section 208(a), the Administrator of the EPA may require any person who is subject to the CAA to provide information necessary to determine whether the person has acted in compliance with the CAA's requirements pertaining to vehicles and engines, including but not limited to the tampering and defeat device prohibitions of Section 203(a)(3) of the CAA, 42 U.S.C. § 7522(a)(3), and the regulations promulgated thereunder. Section 114(a)(1) authorizes the Administrator to require any person

¹ See definition 5 in Appendix A.

subject to the CAA's requirements or who the Administrator believes may have information necessary for the purposes of carrying out the CAA, other than manufacturers subject to Sections 7525(c) or 7542 with respect to provisions of Title II, to provide information reasonably required to carry out the CAA's provisions. The Administrator has delegated this authority to the undersigned Chief of the Vehicle and Engine Enforcement Branch in the Air Enforcement Division, Office of Enforcement and Compliance Assurance.

Appendix A provides definitions. Appendix B provides instructions for Your responses to this Information Request. Appendix C specifies the information that You must provide. Appendix D provides information about asserting a claim of confidentiality over information You provide in response to this Information Request. Appendix E contains the form with which You are required to certify the truth and completeness of Your response. Appendix F, not included with this mailed Request, is an Excel workbook provided by EPA to organize Your responses to Requests 1 through 11, included in the electronic version of the Request for Information being emailed at the email address above. Upon receipt of this Request for Information, contact Eleanor Kane, Environmental Engineer, Air Enforcement Division, EPA at (202) 564-9232, or kane.eleanor@epa.gov, and Ms. Kane will email Appendix F to You.

You must submit this information to Ms. Kane within **thirty (30) calendar days** from the date of signature of this Request for Information. Please submit the requested information electronically. You may do so via email to Ms. Kane at Kane.Eleanor@epa.gov. Please note that the EPA email server will allow attachments up to 20 MB. Alternatively, you may want to provide documents in response to this Request for Information by way of a secure file sharing site. Please let Ms. Kane know how you want to proceed with submitting Your response.

Please carefully review the instructions, definitions, and specific Requests as You prepare Your response. If You anticipate being unable to fully respond to this Request for Information by this deadline, You must contact Ms. Kane within **ten (10) calendar days** of the date of signature of this Request for Information and, with an appropriate justification, request an extension of time to answer some or all of the Requests below. If timely submitted, the EPA will review Your request and may extend the time in which Your response must be provided.

Failure to provide the requested information may result in a civil action pursuant to Sections 113(a)(3) and 205(b) of the CAA, 42 U.S.C. §§ 7413(a)(3) and 7524(b). Failure to provide all requested information in its entirety, and in the format requested, may result in additional inquiries and penalties. Pursuant to Sections 114, 208, and 307 of the CAA, 42 U.S.C. §§ 7414(a)(1), 7542(a)–(b), 7607(a), EPA may request additional information, inspections, or depositions. It is important that Your responses be clear, accurate, organized, and complete. EPA will regard any information that is misleading, false, incomplete, or provided without regard to its accuracy as a violation of the CAA and/or criminal statutes.

You must provide all requested information under an authorized signature with a properly executed Statement of Certification, as provided in Appendix E.

You are entitled to assert a business confidentiality claim covering all or part of the information provided in response to this Request for Information as specified in the procedures described in the Confidentiality of Business Information (“CBI”) regulations, 40 C.F.R. Part 2, Subpart B. However, no CBI claim may be made with respect to emission data as defined at 40 C.F.R. You must specify the page, paragraph, and sentence when identifying the information subject to Your CBI claim. Appendix D of this Information Request provides process and substantiation requirements for asserting business confidentiality claims. The EPA may, without further notice, provide the public with any information not subject to a CBI claim.

The EPA may use any information provided in response to this Information Request in an administrative, civil, or criminal action.

Questions concerning this Request for Information should be directed to Ms. Kane, or your counsel may contact Kayla Steinberg, the EPA Attorney-Advisor assigned to this matter, at (202) 564-7658 or steinberg.kayla@epa.gov.

MARK PALERMO

Digitally signed by MARK
PALERMO
Date: 2024.09.30 13:45:03 -04'00'

Mark J. Palermo, Chief
Vehicle and Engine Enforcement Branch
Air Enforcement Division
United States Environmental Protection Agency

Appendix A

Definitions

All terms used in this Information Request will have their ordinary meaning unless such terms are defined below or in the CAA, 42 U.S.C. §§ 7401–7671q, or the Motor Vehicle and Non-Road Regulations found at 40 C.F.R. Parts 85, 86, 89, 90, 1036, 1037, 1039, 1048, 1051, and 1068, in which case they shall have their meanings as defined therein. If a term is defined in both this Appendix A and in the CAA or the Motor Vehicle and Non-Road Regulations, the definition provided in Appendix A will control for the purpose of this Information Request.

1. The term “information” includes any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intraoffice communications, electronic mail (“email”), instant messages, calendars, contracts, cables, notations of any type of conversation, telephone call, meeting, or other communication, bulletins, printed matter, computer printouts, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, presentations, spreadsheets, and worksheets. The term “information” includes all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments to the foregoing, as well as any attachments or appendices thereto. The term “information” also includes any graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, voicemails, microfiche, microfilm, videotapes, recordings, and motion pictures), electronic and mechanical records or representations of any kind (including, without limitation, tapes, cassettes, disks, computer server files, computer hard drive files, CDs, DVDs, back-up tape, memory sticks, recordings, and removable computer media such as thumb drives, flash drives, memory cards, and external hard drives), and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, electronic format, disk, videotape or otherwise. Information bearing any notation not part of the original text is considered to be separate information. A draft or non-identical copy is separate information within the meaning of this term.
2. The term “entity” means any natural person, corporation, partnership, limited liability company, sole proprietorship, joint venture, or any formal or informal group, organization, or association.
3. The term “person” includes an individual, corporation, partnership, or association. See Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

4. A reference to any entity by name includes the entity and any of the entity's affiliated organizations,² predecessors, successors, and assignees.
5. The term "You" means, collectively, SPELAB Auto Parts and any of their parent organizations, affiliated organizations, predecessors, successors, or assignees, including but not limited to Hangzhou Weihong Technology Co., Ltd.
6. The term "affiliated organization" means any organization or entity associated with another entity as an agent, parent organization, predecessor corporation, subsidiary organization, or any organization or entity acting in lieu of another entity.
7. The term "applications" means all vehicle or engine configurations.
8. The term "emission related parts" means those parts installed for the specific purpose of controlling emissions, or those components, systems, or elements of design which must function properly to assure continued vehicle emission compliance, as defined in 40 C.F.R. § 85.2102.
9. The term "element of design" means any control system (e.g., 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, as defined in 40 C.F.R. §§ 86.094-2 and 86.1803- 01.
10. The term "electronic control module" or "ECM" means a device that receives inputs from various sensors and puts out signals to control engine, vehicle, or equipment functions. The ECM uses software programming including calculations and tables of information to provide the appropriate outputs. Multiple electronic control modules may be incorporated in a single unit to control various engine, vehicle, or equipment functions. ECM is used in this Information Request as a generic term, but may refer specifically to the engine control module when discussing emission controls on vehicles and engines. Examples of ECMs include, but are not limited to, the Engine Control Module, OBD Control Modules, Powertrain Control Module ("PCM"), Transmission Control Module ("TCM"), Body Control Module ("BCM") and aftertreatment control module.
11. The term "engine tuner" or "tuner" means any device or product capable of accessing, altering, or replacing the software programming, calculations, computer logic, tables of information (e.g., fuel timing maps), coding, or other content or information stored within or used by an ECM.

² See definition 6, below.

12. The term “engine tune” or “tune” means any combination of software programming, calculations, computer logic, tables of information (e.g., fuel timing maps), coding, or other content or information, stored in any form, capable of affecting or controlling an ECM.
13. The term “product” includes any software code, software, hardware, program, element of design, calibration, tune, tuner, device, part, or component.
14. The term “selective catalytic reduction” or “SCR” system means exhaust aftertreatment systems which inject a reductant, such as diesel exhaust fluid (“DEF”), into the exhaust stream where it reacts with a catalyst to convert Nitrogen Oxides (“NO_x”) emissions to Nitrogen Gas (“N₂”) and Water.
15. The term “onboard diagnostics” or “OBD” system means systems which monitor components’ emission-related systems and assist repair technicians in diagnosing and fixing problems with those emission-related systems. A functioning OBD system may record Diagnostic Trouble Codes (“DTCs”), illuminate Malfunction Indicator Lights (“MILs”) or other warning lamps on the vehicle instrument panel, and/or provide information to the ECM which induces Engine Derate due to malfunctioning or missing emission-related systems.
16. The term “exhaust gas recirculation” or “EGR” means systems which redirect, usually by use of an EGR valve, a portion of engine exhaust back into the engine’s combustion chamber to cool and reduce peak combustion temperatures and pressures. The EGR system may include an EGR cooler to cool the recirculated exhaust to further reduce the combustion temperature.
17. The term “diesel particulate filter” or “DPF” means an exhaust aftertreatment device that physically traps particulate matter (“PM”) and removes it from the exhaust stream of diesel fueled vehicles and equipment.
18. The term “manufacture” includes the creation, design, development, alteration, fabrication, production, or programming of a software code, software, hardware, program, element of design, calibration, engine tune, engine tuner, device, part, or component.
19. The term “crankcase ventilation” or “CCV” system means the system which controls vehicle emissions by recirculating crankcase gases back to the combustion chamber.
20. The term “engine derate” or “limp-home mode” means an ECM mode that reduces the engine power after the OBD system identifies a problem with an emission-related system.

21. The term “catalysts” means systems or devices which increase the rate of a chemical reaction but are not one of the original reactants or final products, i.e., the catalyst is not consumed or altered in the reaction. The term “catalysts” includes emission control catalysts that are exhaust aftertreatment devices such as Diesel Oxidation Catalysts (“DOCs”).

Appendix B

Instructions for Responses

When providing the information requested in Appendix C, use the following instructions:

1. Provide a complete, detailed response to each of the requests in Appendix C, below. Provide any narrative responses or lists in English. Where noted in Appendix C, provide answers in the specified format (e.g., electronic unlocked spreadsheet). Appendix F, which can be provided to You via email by contacting Eleanor Kane, Environmental Engineer, at kane.eleanor@epa.gov, consists of an Excel workbook in which You are requested to organize Your responses to Requests 1 through 11. Please populate the workbook with Your responses to Requests 1 through 11 in accordance with all instructions. Requests 1 through 11 are summarized in Appendix F for Your convenience only. The Request summaries in Appendix F are not substitutes for the full text of the Requests in Appendix C.
2. If a given spreadsheet response field requested does not apply or is not available, list “n/a” for the corresponding cell and provide a narrative explanation as to why You believe the question does not apply. If you do not have document responsive to a specific Information request, you must indicate so in your response.
3. This Request for Information is a continuing request. You must promptly supplement Your response to any request in Appendix C in the event You learn that You possess responsive information not yet produced or if You gain possession, custody, or control of responsive information after initially responding to this Request for Information Request.
4. For each answer, provide the number of the request to which it responds and identify each person who provided information that was used to prepare that answer. For each document produced, provide the number of the request to which it responds.
5. When a response is provided in the form of a number, specify the units of measure corresponding to the number.
6. Where documents or information necessary for a response is not in Your possession, custody, or control, indicate in Your response why such documents or information are not available or in your possession, custody, or control, and identify any source that either possesses or is likely to possess such information.
7. Where a request allows or requires documents to be provided in response, provide all documents electronically in a folder specific to that request and labeled with the number of the request. Follow any other formatting or naming conventions specified by the request. All submitted documents should be copies and not original documents.

8. Where You have previously submitted information to EPA that is also the subject of the Request for Information, re-submit that information in accord with these instructions. (Appendix B). Identify the material that was previously provided, the date on which it was provided, how the information was provided (*e.g.*, electronically, fax, mail), and the individual at EPA to whom it was provided.
9. Provide Your response to this Request for Information in electronic form. All responsive documents and materials (*e.g.*, copies of print media, audio, and visual material) must be provided as an accurate and legible copy in searchable unlocked format, number stamped in sequential order (*e.g.*, BATES stamped). Where spreadsheets are responsive to a Request, produce them in unlocked electronic .xlsx spreadsheet format (locked files are unacceptable).

Appendix C
Information Request

Provide the following information to EPA, pursuant to Sections 114(a)(1) and 208(a) of the CAA, 42 U.S.C. §§ 7414(a)(1) and 7542(a).

In an electronic, unlocked version of Appendix F, provide the following information:

In Appendix F, worksheet 1:

1. Identify each product that SPELAB manufactured, sold, installed, or offered for sale during the period January 1, 2021, through the date of signature of this Information Request, that, individually or in conjunction with other products:
 - a. permanently or temporarily bypasses, removes, deletes, replaces, or interferes with a motor vehicle's emission related parts, including but not limited to the EGR, DPF, DOC, CCV, SCR, or OBD systems, or any sensors, signals, or records related to those systems; or
 - b. bypasses, removes, deletes, replaces, reprograms, overwrites, or interferes with a motor vehicle's ECM, software programming, or calibrations.

Examples of such products include, but are not limited to: tuners, tunes, block off plates, re-route plates, re-route pipes, performance exhaust systems, delete pipes, race pipes, straight pipes, upgrade pipes, delete kits, or upgrade kits.

2. For each product identified in response to Request 1, provide the:
 - a. Product Name;
 - b. Part Number, Item Code, or other unique identifier used by SPELAB;
 - c. Product manufacturer;
 - d. Quantity SPELAB manufactured or sold during the period January 1, 2021, through the date of signature of this Information Request;
 - e. Average SPELAB sale price;
 - f. Business entity or person (e.g., SPELAB or Hangzhou Weihong Technology Co., Ltd.) that received a portion or all of the revenue from the sale of each product;
 - g. Point of Sale (i.e., spelabautoparts.com, flasharkracing.com, eBay, Amazon, YouTube, Facebook, in-store); and
 - h. California Air Resources Board (CARB) Executive Order number, if any.
3. For each product identified in response to Request 1, provide the product's associated vehicle applications by make, model, engine type, and year.
4. For each product identified in response to Request 1, indicate whether SPELAB indicated to customers that the product is only for testing, maintenance, racing, off-road, or other restricted use.

5. For each product identified in response to Request 1, indicate whether the product:
 - a. Affects the operation of the EGR System;
 - b. Affects the exhaust aftertreatment system;
 - c. Affects the OBD system or related sensors;
 - d. Affects ECM calibrations regarding fuel timing;
 - e. Is a tuner sold without tunes;
 - f. Is a tuner sold with tunes;
 - g. Is a tune sold without a tuner; or
 - h. If the answer to all the previous seven questions is no, describe the product in detail.
6. For each product identified in response to Request 1 that is a tune sold without a tuner, identify all compatible tuners that can be used to download the tune to the ECU.
7. For each product identified in response to Request 1 that is a tune or a tuner sold with tunes, indicate whether the product, upon installation and without post-sale modification, does or is capable of doing the following:
 - a. Disabling the EGR system without illuminating a MIL or prompting any on-board DTC;
 - b. Disabling the EGR system without any engine derating;
 - c. Allowing the removal of the EGR system without illuminating a MIL or prompting any on-board DTC;
 - d. Allowing the removal of the EGR system without any engine derating;
 - e. Disabling a DPF system without illuminating a MIL or prompting any on-board DTC;
 - f. Disabling a DPF system without any engine derating;
 - g. Allowing removal of a DPF system without illuminating a MIL or prompting any DTC;
 - h. Allowing removal of a DPF system without any engine derating;
 - i. Disabling a DOC system without illuminating a MIL or prompting any on-board DTC;
 - j. Disabling a DOC system without any engine derating;
 - k. Allowing removal of a DOC system without illuminating a MIL or prompting any DTC;
 - l. Allowing removal of a DOC system without any engine derating;
 - m. Disabling a SCR system without illuminating a MIL or prompting any on-board DTC;
 - n. Disabling a SCR system without any engine derating;
 - o. Allowing removal of a SCR system without illuminating a MIL or prompting any on-board DTC;
 - p. Allowing removal of a SCR system without any engine derating;
 - q. Altering fuel timing maps within engine electronic calibrations; or
 - r. Preventing DTCs or MILs from being recorded or illuminated.
8. For each product identified in response to Request 1 that is a tune or a tuner sold with tunes, provide a description of the product, including the changes the product makes or claims to make to a stock calibration (*e.g.*, advertised horsepower improvement).

9. For each product identified in response to Request 1 that is not a tune or a tuner, identify:
- a. All stock components each product replaces;
 - b. Whether the product requires tuning or a tuner;
 - c. Whether the product physically replaces or allows the removal, bypass, or disabling of the DPF;
 - d. Whether the product contains a DPF;
 - e. Whether the product physically replaces or allows the removal, bypass, or disabling of the DOC;
 - f. Whether the product contains a DOC;
 - g. Whether the product physically replaces or allows the removal, bypass, or disabling of the SCR system;
 - h. Whether the product contains a SCR system;
 - i. Whether the product physically replaces, removes, bypasses, deactivates, or blocks off the EGR system;
 - j. Whether the product allows the EGR system to operate in its OEM stock configuration;
 - k. Whether the product physically replaces, removes, bypasses, deactivates, or blocks off the CCV system;
 - l. Whether the product allows the CCV system to operate in its OEM stock configuration;
 - m. Whether the product physically replaces or allows the removal or bypass of sensors connected to the ECM or OBD system; and
 - n. Whether the product allows the ECM or OBD system to operate in their OEM stock configuration.
10. For each product identified in response to Request 1 that is not a tune or a tuner, describe how each product differs from the stock components or specifically changes the stock configuration. You may provide owner's or installation manuals for a product in lieu of a narrative description. If providing the owners or installation manuals in an electronic format, identify the electronic file name associated with each manual provided.

In Appendix F, worksheet 2:

11. For each product identified in response to Request 1 that SPELAB sold during the period January 1, 2021, through the date of signature of this Information Request, provide the name, address, and phone number(s) of the purchaser, any invoice data, and all other commercial information for each sale to a purchaser. You may provide the requested information in a spreadsheet exported from an invoice or sales management program in lieu of using Appendix F.

Provide the following information on the products identified in Request 1:

12. For each product identified in response to Request 1, provide:
 - a. A detailed written description of all methods by which the product has been promoted or publicized by SPELAB, including but not limited to, print media, commercial websites, point-of-sale webpages, event promotion or sponsorship, trade show promotion, social media promotion (*e.g.*, YouTube, Instagram, Facebook, X (formerly known as Twitter), Tiktok, etc.), or through cooperative advertising;
 - b. Provide copies of all advertisements for the product published in print or electronic media, including commercial websites, point-of-sale webpages, or social media; and
 - c. Provide all manuals available (*e.g.*, owner's manual and installation manual).
13. For products identified in response to Request 1, state whether SPELAB or any other entity conducted tests measuring emissions of hydrocarbons (HC), carbon monoxide (CO), nitrogen oxides (NO_x), or particulate matter (PM), including tests that measure the impact of the product on motor vehicle emissions or that measure the impact of the product on a vehicle's emission control devices or elements of design. For each such test, provide the following information:
 - a. A description of the test, including identification of the product and vehicle, the EPA engine family, name of the vehicle, test equipment, test protocols, and calibration procedures;
 - b. A sample test report and any training or instructional materials used for educating employees and affiliates about how to perform the test; and
 - c. The date and location of the test, the name and position of the person that conducted the test, the purpose of the test, and the test results.
14. For products identified in response to Request 1, state whether You submitted an application for an Executive Order to the California Air Resources Board (CARB) and, if so, provide a copy of the application for each product. State whether each product received an Executive Order exempting the product from California's emission control system anti-tampering law, California Vehicle Code § 27156. If the product received an Executive Order, state whether CARB required changes to the product or application to receive approval.
15. For products identified in response to Request 1, if SPELAB has indicated that a product is only for testing, maintenance, racing, off-road, or other restricted use, provide a detailed description of the mechanisms, if any, that SPELAB has implemented to ensure that the component is only used for such purposes, with any and all supporting documentation.

Provide the following information on SPELAB's business structure, relationships to other entities, and web presence:

16. Provide a detailed, written description of the current business structure of SPELAB, and any affiliated organizations, including an organizational chart depicting the parent and subsidiary companies affiliated with SPELAB, entities under common ownership with SPELAB, and relative ownership interests in each entity.
17. Provide a copy of SPELAB's corporate documents, including but not limited to articles of incorporation, by-laws, certificates of good standing, and partnership or membership agreements. Provide a list of SPELAB's officers, directors, owners, shareholders, members, managers, or partners, as applicable.
18. For any part of SPELAB's business ownership which has been sold or transferred to another entity since January 1, 2021, identify each such entity, including location, address and email, the date of the sale or transfer, and describe specifically what was sold or transferred.
19. Provide the location of all facilities where SPELAB manufactures or stores products or inventory. If SPELAB dropships products, identify the wholesalers, manufactures, or other entities you have dropshipping arrangements with (e.g., US eLogistics Service Corp.), describe those arrangements, and provide any and all supporting documentation (including but not limited to contracts).
20. Provide a list of SPELAB's current and former employees (including independent contractors) based in the United States, within the last five years, indicating each employee's dates of employment, job title(s), and job responsibilities.
21. Describe the relationships between SPELAB Auto Parts and the following entities: Hangzhou Weihong Technology Co., Ltd., Shenzhen Bomet Technology, and Flashark (also known as Flashark Racing), and identify any owners, officers, or employees that they share or have shared in common. Include an explanation of the trademark applications Hangzhou Weihong Technology Co., Ltd. filed for SPELAB on July 1, 2019, and for Flashark on October 13, 2020. Provide copies of any written agreements between or on behalf of Hangzhou Weihong Technology Co., Ltd and SPELAB.
22. Between January 1, 2021, and the date of signature of this Information Request, describe the respective role SPELAB Auto Parts and Hangzhou Weihong Technology Co., Ltd. have in the below activities:
 - a. Maintaining and updating the website <https://spelabautoparts.com>;
 - b. Customer support for the website <https://www.spelabautoparts.com>;
 - c. Fulfilling orders made on the website <https://www.spelabautoparts.com>;
 - d. Providing customer support for the items and services sold on <https://www.spelabautoparts.com>;

- e. Collecting payment for products or services sold on <https://www.spelabautoparts.com>;
 - f. Maintaining and updating the website <https://www.flasharkracing.com>;
 - g. Customer support for the website <https://www.flasharkracing.com>;
 - h. Fulfilling orders made on the website <https://www.flasharkracing.com>;
 - i. Providing customer support for the items and services sold on <https://www.flasharkracing.com>; and
 - j. Collecting payment for products or services sold on <https://www.flasharkracing.com>.
23. List the online platforms SPELAB uses to advertise its business, including listservs, forums, websites, or content sharing platforms.
24. Provide the following information related to SPELAB's YouTube account (<https://www.youtube.com/@spelabofficial>), Facebook account (<https://www.facebook.com/SPELABAutoparts>), Instagram account (<https://www.instagram.com/spelabautoparts/>), and TikTok account (<https://www.tiktok.com/@spelabofficial>):
- a. Identify the person(s), by name and business title, who manage(s) each account.
 - b. Identify the person(s), by name and business title, who publishes(s) videos, pictures, and posts on each account.
 - c. Identify the person(s) who comment(s) or respond(s) to public messages on each account.
25. List any other social media account names and account handles associated with SPELAB.
26. Identify each person responsible for responding to this Information Request Appendix C, including his or her title, and the Request(s) to which he or she responded.

Appendix D

Confidential Business Information

An entity may assert a business confidentiality claim covering all or part of the information provided in response to this Information Request for any business information entitled to confidential treatment under Sections 114(c) and 208(c) of the CAA, 42 U.S.C. §§ 7414(c) and 7542(c), and 40 C.F.R. Part 2, subpart B. Under Sections 114(c) and 208(c) of the CAA, entities are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Sections 114(c) and 208(c) of the CAA and 40 C.F.R. Part 2, subpart B. If no such business confidentiality claim accompanies the response to this Request for Information when it is received by EPA, then such information may be made available to the public without further notice. *See* 40 C.F.R. § 2.203(c).

Pursuant to 40 C.F.R. § 2.301(h), EPA possesses the authority to disclose to any authorized representative of the United States information which might otherwise be entitled to confidential treatment. To assist in its review and analysis, EPA may disclose information provided in response to this and other information requests to an EPA contractor, the Eastern Research Group, under contract number 68HERH19C0004.

To assert a business confidentiality claim, an entity must place on (or attach to) all information subject to the claim either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time it provides its response to this Information Request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be provided separately to facilitate identification and handling by EPA. An entity should indicate whether confidential treatment is only required until a certain date or until the occurrence of a certain event.

The criteria EPA will use in determining whether material claimed as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208(a)-(d) and 2.301. Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. *See* 42 U.S.C. § 7542(c); 40 C.F.R. § 2.301(e).

Appendix E
Statement of Certification

[This Certification is for signature by the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or another executive with authority to perform similar policy or decision-making functions of the corporation.]

You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Information Request, issued pursuant to Sections 114(a)(1) and 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

I certify that I am fully authorized by SPELAB and its parent organizations, affiliates, predecessors, successors, and assignees, to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

Date: _____

Name (Printed): _____

Signature: _____

Title: _____

CERTIFICATE OF MAILING

I, Nathan Dancher, certify that on this day I sent this Request for Information Under Sections 114(a)(1) and 208(a) of the Clean Air Act, 42 U.S.C. §§ 7414(a)(1) and 7542(a), by Certified Mail, Return Receipt Requested, to:

Oliver George, Partnership Manager
SPELAB
18275 Fullerton Rd.,
City of Industry, CA 91748

and I emailed this Notice of Violation to: partners@spelabautoparts.com

Date: _____

Dancher, Nathan

Digitally signed by Dancher,
Nathan
Date: 2024.10.01 10:45:02 -04'00'

Nathan Dancher
Environmental Engineer
Air Enforcement Division
United States Environmental Protection Agency
dancher.nathan@epa.gov