

EPA OECA Air Enforcement Division
INSPECTION REPORT

Inspection Date(s):	03/06/2023- 03/07/2023		
Media:	Air		
Regulatory Program(s)	Title II Mobile Sources		
Company Name:	Ritchie Brothers Auctioneers		
Facility Name:	Ritchie Brothers Auctioneers – Fort Worth Texas		
Facility Physical Location:	6050 Azle Ave., Lake Worth, Texas 76135		
(city, state, zip code)			
Mailing address:	6050 Azle Ave., Lake Worth, Texas 76135		
(city, state, zip code)			
County/Parish:	Tarrant County		
Facility Contact:	Kolby Worthy	Regional Operations Manager	
FRS Number:	N/A		
Identification/Permit Number:			
Media Number:	N/A		
NAICS:	N/A		
SIC:	N/A		
Facility Representatives:	Kolby Worthy	Regional Operations Manager	817-238-5865
EPA Inspectors:	Mario Jorquera	OECA/OCE/AED/VEEB	202-564-1079
	Victor Aguilar	OECA/OCE/AED/VEEB	202-564-9679
	{name}	{affiliation/mailcode}	{phone no.}
State Inspector(s):	{name}	{affiliation/mailcode}	{phone no.}
	{name}	{affiliation/mailcode}	{phone no.}
Other Inspector(s):	{name}	{affiliation/mailcode}	{phone no.}
	{name}	{affiliation/mailcode}	{phone no.}
Metadata	Title:	Ritchie Brothers Auctioneers Inspection; Fort Worth, TX	
	Author:	Victor Aguilar	
	Subject:	Inspection of Potentially Imported Vehicles and Engines at an Auction House	
	Keywords:	Inspection Report of Vehicle and Engine Goods at an Auction House	
EPA Lead Inspector Signature/Date	VICTOR AGUILAR	Digitally signed by VICTOR AGUILAR Date: 2023.06.12 09:28:14 -04'00'	
	{Inspector name}		Date
Supervisor Signature/Date	MARK PALERMO	Digitally signed by MARK PALERMO Date: 2023.09.26 14:35:12 -04'00'	
	{Supervisor name}		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

On March 6, 2023, EPA HQ Air Enforcement Division, Vehicle and Engine Branch inspectors Mario Jorquera and Victor Aguilar arrived on the premises of Ritchie Brothers Auctioneers in Lake Worth, Texas for an unannounced inspection of their facility which specializes in auctioning off heavy duty pieces of construction and agricultural equipment and engines. We entered the main office at 1:56pm and Mario asked a person at the front desk to speak with the person in charge. The person asked what this was regarding, and Mario explained that we were with the EPA's Vehicle and Engine Branch and that we were there to conduct Clean Air Act Title II inspections on some of the products present in their auction yard. A few minutes later Kolby Worthy, the Regional Operations Manager of that facility greeted us. Mario and Victor showed Mr. Worthy our inspector credentials and explained that we were at his facility to inspect some of their pieces of equipment on the auction yard, to check for compliance with the Clean Air Act.

FACILITY DESCRIPTION

The facility where we met Mr. Kolby Worthy was the main office building of the Ritchie Brothers Auctioneers Fort Worth site and is where all the employee's offices are, as well as the main customer reception area. The main office building is adjacent to the auction yard, which is where the company stores thousands of pieces of equipment and vehicles, which will eventually be auctioned off to the public.

At the time of our visit there was one person interacting with customers at the main desk and several people in their own private offices. There were also several people present at the auction yard, taking inventory of the products and preparing them for the upcoming auction.

The facility operates 5 days a week from 8:00am to 5:00pm.

Section II - OBSERVATIONS

Mr. Worthy gave consent to the EPA inspectors to conduct our inspections and also provided Mario and Victor with his Ritchie Brothers business card. Afterwards, Mr. Worthy escorted us to the auction yard and asked what kind of equipment we were interested in looking at. Inspector Victor Aguilar mentioned that we were interested in looking at a couple of pieces of equipment that we found advertised online, but that we were also interested in inspecting other pieces of equipment that looked interesting or suspicious. A special emphasis was placed on products for which we did not recognize the name of the manufacturer of and newer pieces of equipment. Mario also explained to Mr. Worthy how EPA VEEB inspectors typically conducted our inspections of vehicles and engines, including taking pictures of the equipment from several perspectives, opening the engine compartment, and taking pictures of the engine, any Emission Control Information labels, and any visible emission controls.

Inspections at the Auction Yard:

Inspection #	1
Date	3/6/23
Inspection Photos	1527-1535 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Hydraulic Excavator
Brand	XCMG
Equipment Manufacturer	Xuzhou Xugong Excavator Machinery Co. Ltd.
Model	XE 360U
VIN	XUG03600HHKA00084
Equipment Build Date	August 2017
ECI Label	Found/ Not removable
Company on ECI	Cummins
EFN	ACEXL019.AAD
Emission Controls listed	TC, CAC
Engine Build Date	June 30, 2016
Fuel	Diesel
EPA Regs Certified to	1039.625 (TPEM. Tier 3)
Emission Controls Observed	-
Owner Code	
Used or New?	Used
Imported?	Unconfirmed (Equipment appears to have been made in China)

Inspection #	2
Date	3/6/23
Inspection Photos	1536 – 1543 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Hydraulic Excavator
Brand	Doosan
Equipment Manufacturer	Doosan Infracore Co., Ltd.
Model	DX 300-LC-5
VIN	DHKCECEAEH0020257
Equipment Build Date	May 10, 2018
ECI Label	Found/Not removable
Company on ECI	Doosan
EFN	HDICL07.6LEA
Emission Controls listed	TC, CAC, EGR, DOC, SCR
Engine Build Date	August 2017
Fuel	Diesel (ultra-low sulfur only)
EPA Regs Certified to	2017 non-road diesel (Tier 4)
Emission Controls Observed	EGR, DOC, SCR
Owner Code	

Ritchie Brothers Auctioneers/ Ritchie Brothers Auctioneers – Fort Worth Texas
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Used or New?	Used
Imported?	Unconfirmed (Equipment made in Korea)

Inspection #	3
Date	3/6/23
Inspection Photos	1545-1552 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Double Drum Roller
Brand	Caterpillar
Equipment Manufacturer	Caterpillar Paving Products Inc.
Model	CB66B
VIN	CATCB66BPB6600227
Equipment Build Date	2017
ECI Label	Found/ Not removable
Company on ECI	Perkins
EFN	HPKXL04.4MT1
Emission Controls listed	DOC, EGR, SCR, AMOX, EPR
Engine Build Date	March 2017
Fuel	Diesel (ultra-low sulfur only)
EPA Regs Certified to	2017 non-road diesel
Emission Controls Observed	DOC, SCR, EGR
Owner Code	
Used or New?	Used
Imported?	Unconfirmed (Made in USA)

Inspection #	4
Date	3/6/23
Inspection Photos	1553-1562 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Telehandler
Brand	Caterpillar
Equipment Manufacturer	JLG Industries Inc.
Model	TL642
VIN	TBK00283
Equipment Build Date	2007
ECI Label	Found/ Not removable
Company on ECI	Perkins
EFN	Export Only label
Emission Controls listed	
Engine Build Date	2008
Fuel	Diesel
EPA Regs Certified to	None

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Emission Controls Observed	None
Owner Code	
Used or New?	Used
Imported?	Unconfirmed (Equipment likely made in USA)

Inspection #	5
Date	3/6/23
Inspection Photos	1563-1576 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Diesel Pickup Truck
Brand	Ford
Equipment Manufacturer	Ford Motor Company
Model	F450
VIN	1FD0W4HTXKEF25203
Equipment Build Date	May 2019
ECI Label	Found/ Not removable
Company on ECI	Ford Motor Company
EFN	KFMXH06.7P4A
Emission Controls listed	CAC, EGR, OC, PTOX, SCR
Engine Build Date	
Fuel	Diesel
EPA Regs Certified to	2019 Incomplete Class 4-5 vocational vehicle
Emission Controls Observed	After-treatment systems removed via straight pipe
Owner Code	
Used or New?	Used
Imported?	Unknown (Made in USA)

Inspection #	6
Date	3/6/23
Inspection Photos	1577-1592 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Diesel Pickup Truck
Brand	Dodge Ram
Equipment Manufacturer	Chrysler Group LLC
Model	5500
VIN	3C7WDMFL3CG331620
Equipment Build Date	November 2012
ECI Label	Not found
Company on ECI	-
EFN	-
Emission Controls listed	-
Engine Build Date	-

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Fuel	Diesel
EPA Regs Certified to	-
Emission Controls Observed	After-treatment systems removed via straight pipe
Owner Code	
Used or New?	Used
Imported?	Unknown (Made in Mexico)

Inspection #	7
Date	3/6/23
Inspection Photos	1593-1607 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Diesel Pickup Truck
Brand	Dodge Ram
Equipment Manufacturer	Chrysler Group LLC
Model	3500
VIN	3C63DRGL5CG110183
Equipment Build Date	August 2011
ECI Label	Found/ Not removable
Company on ECI	Certified by Cummins for Chrysler Group
EFN	CCEX06.78WV
Emission Controls listed	TC, CAC, PTOX, OC, EGR, NAC
Engine Build Date	
Fuel	Diesel
EPA Regs Certified to	2012 Heavy Duty Vehicle standards
Emission Controls Observed	After-treatment systems removed via straight pipe
Owner Code	
Used or New?	Used
Imported?	Unknown (Made in Mexico)

Inspection #	8
Date	3/6/23
Inspection Photos	1593-1607 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Diesel Pickup Truck
Brand	Ford
Equipment Manufacturer	Ford Motor Company
Model	F350
VIN	1FD8W3HT5BEB06107
Equipment Build Date	August 2010
ECI Label	Found/ Not Removable
Company on ECI	Ford
EFN	BFMXH06.7A24

Emission Controls listed	TC, CAC, EGR, OC, PTOX, SCR
Engine Build Date	
Fuel	Diesel
EPA Regs Certified to	2011 Incomplete Vehicle/ Heavy Duty Engine Standards
Emission Controls Observed	After-treatment systems removed via straight pipe
Owner Code	
Used or New?	Used
Imported?	Unknown

This was the last inspection that inspectors Mario Jorquera and Victor Aguilar performed on 3/6/23. After we completed this inspection, we notified Mr. Worthy that we would be retuning the next morning to continue our inspection of the Ritchie Brothers Auctioneers facility in Fort Worth. He said that that would be fine with him.

Day 2 – Meet with Mr. Worthy before inspection

On March 7, 2023, EPA inspectors Mario Jorquera and Victor Aguilar arrived on the premises of Ritchie Brothers Auctioneers in Fort Worth, Texas. At 8:53 am, EPA inspectors met with Mr. Worthy inside the Ritchie Brothers office and notified him that we had just been made aware of the fact that EPA's Office of Transportation and Air Quality visited the same facility the previous week, in order to conduct testing of a new instrument intended to identify tampered vehicles. EPA inspector Mario Jorquera explained to Mr. Worthy that the office of compliance is separate from the office of enforcement and that the back-to-back visits by EPA to their facility was completely coincidental. Mr. Worthy said that he was initially a little confused about the unique situation and thanked Mario for the clarification. EPA inspector Aguilar then gave Mr. Worthy a list of the pieces of equipment that EPA was interested in inspecting on that day. Mr. Worthy said that he would help us look for these pieces of equipment and escorted Mario and Victor to the auction yard.

Inspections at the Auction Yard:

Inspection #	1A
Date	3/7/23
Inspection Photos	1593-1607 (Canon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Mini Excavator
Brand	JF Industrial, MMS, Agrotk, AGT Industrial, Visec, Donway,
Equipment Manufacturer	JF Industrial
Model	JF12 (JF Industrial), MS13 (MMS), H12 (Agrotk), VC13 (Visec), DY130W (Donway),
VIN	MSFW331401 (MMS), H1222121002E (Agrotk)
Equipment Build Date	November 2022 (MS13), 2022 (Agrotk),
ECI Label	Found/ Not removable

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Company on ECI	Briggs and Stranton
EFN	NJDGS.4202UA
Emission Controls listed	EM
Engine Build Date	November 2022
Fuel	Gasoline
EPA Regs Certified to	MY2022
Emission Controls Observed	EM
Owner Code	
Used or New?	New
Imported?	Unknown (Made in China)

Inspection #	1
Date	3/7/23
Inspection Photos	1624-1638 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Hydraulic Excavator
Brand	XCMG
Equipment Manufacturer	XCMG/ Xugong Excavator Machinery Co., Ltd.
Model	XE35U (Equipment), ESXG (Engine)
VIN	XUGE035UPLKA00528
Equipment Build Date	2020
ECI Label	Found but unable to read because of location on engine
Company on ECI	Yanmar
EFN	-
Emission Controls listed	-
Engine Build Date	-
Fuel	-
EPA Regs Certified to	-
Emission Controls Observed	-
Owner Code	
Used or New?	Unknown
Imported?	Unknown

Inspection #	2
Date	3/7/23
Inspection Photos	1639-1652 (Nikon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Mini excavator
Brand	JF Industry
Equipment Manufacturer	JF Industry
Model	CFG 40UF

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VIN	CFG40UF230032
Equipment Build Date	October 2022
ECI Label	Found
Company on ECI	Kubota
EFN	NKBXL01.6ECB
Emission Controls listed	EM, DFI
Engine Build Date	September 2022
Fuel	Diesel
EPA Regs Certified to	2022 US EPA Non-road Tier 4
Emission Controls Observed	No ATS system
Owner Code	-
Used or New?	New
Imported?	Yes

Inspection #	3
Date	3/7/23
Inspection Photos	1-14 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Mini excavator
Brand	JF Industrial
Equipment Manufacturer	JF Industrial
Model	JF12
VIN	422257915
Equipment Build Date	-
ECI Label	Found
Company on ECI	Briggs & Stratton, LLC.
EFN	NJDGS.4202UA
Emission Controls listed	EM
Engine Build Date	November 2022
Fuel	Gasoline
EPA Regs Certified to	2022 Non-road SI
Emission Controls Observed	None
Owner Code	■
Used or New?	New
Imported?	Yes

Inspection #	3A
Date	3/7/23
Inspection Photos	36-58 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Telehandler
Brand	JCB

Equipment Manufacturer	JC Bamford Excavators Limited
Model	509.42 F (Equipment), 444 TA4-55L1 (Engine)
VIN	JCB5CF7GKK2911820 (Equipment), 41533U1331019 (Engine)
Equipment Build Date	-
ECI Label	Found/ Not removable
Company on ECI	JCB Power Systems
EFN	KJCBL04.4TAE
Emission Controls listed	EGR, TC, CAC (Delegated Assembly)
Engine Build Date	April 2019
Fuel	Diesel
EPA Regs Certified to	2019 EPA Non-Road Diesel
Emission Controls Observed	"No DEF required" label; No ATS found
Owner Code	
Used or New?	Used
Imported?	Unknown

Inspection #	4A
Date	3/7/23
Inspection Photos	59- 67 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Telehandler
Brand	Merlo S.p.A.
Equipment Manufacturer	Merlo S.p.A.
Model	MF40.9 CS (Equipment), TCD 4.1 L4 (Engine)
VIN	ZF1F50TB0C7000121
Equipment Build Date	2017
ECI Label	Found/ not removable
Company on ECI	Deutz
EFN	EDZXL06.1033
Emission Controls listed	DDI, TC, CAC, EGR, ECM, CTOX
Engine Build Date	October 2015
Fuel	
EPA Regs Certified to	1039.625
Emission Controls Observed	EGR, TC, DOC
Owner Code	-
Used or New?	Used
Imported?	Unknown

Inspection #	4
Date	3/7/23
Inspection Photos	68-98 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar

Type of equipment	Telehandler
Brand	JCB
Equipment Manufacturer	JC Bamford Excavators Limited
Model	510.56F (Equipment), 444 TA4-55 L1 (Engine)
VIN	JCB5CG7GAK2910758 (Equipment), SL320/41533 U0759819 (Engine)
Equipment Build Date	
ECI Label	Found/ not removable
Company on ECI	JCB Power Systems
EFN	KJCBL04.4AT5
Emission Controls listed	EGR, TC, CAC
Engine Build Date	February 2019
Fuel	Diesel
EPA Regs Certified to	2019 Non-Road diesel engines
Emission Controls Observed	"No DEF required" label; No ATS found
Owner Code	
Used or New?	Used
Imported?	Unknown

Inspection #	5
Date	3/7/23
Inspection Photos	99- 116 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Roller
Brand	XCMG
Equipment Manufacturer	XCMG Construction Machinery
Model	CV 122PD (Equipment), QSB4.5 (Engine)
VIN	XUG01231PJJE04295 (Equipment), 22304893 (Engine)
Equipment Build Date	October 2018
ECI Label	Found/ not removable
Company on ECI	Cummins
EFN	"323"
Emission Controls listed	EM, TC, CAC
Engine Build Date	March 15, 2015
Fuel	Diesel
EPA Regs Certified to	1039.625
Emission Controls Observed	None
Owner Code	
Used or New?	Used
Imported?	Unknown

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Inspection #	6
Date	3/7/23
Inspection Photos	117- 128 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Roller
Brand	XCMG
Equipment Manufacturer	XCMG Construction Machinery
Model	CV122PD (Equipment), QSB4.5 (Engine)
VIN	XUG0123AHJE04461
Equipment Build Date	November 2017
ECI Label	Found/ not removable
Company on ECI	Cummins
EFN	BCEXL0409ACC
Emission Controls listed	ECM, TC, CAC
Engine Build Date	August 21, 2017
Fuel	Diesel
EPA Regs Certified to	TPEM (1039.625)
Emission Controls Observed	CAC, No ATS observed
Owner Code	
Used or New?	Used
Imported?	Unknown

Inspection #	7
Date	3/7/23
Inspection Photos	129- 137 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Pressure Washer
Brand	Easy Kleen
Equipment Manufacturer	Easy-Kleen Pressure Systems Ltd.
Model	Magnum 400 Series Gold/ GS18
VIN	230609
Equipment Build Date	September 2022
ECI Label	Found/ not removable
Company on ECI	Lifan Technology (Group) Co., Ltd.
EFN	NCLGS.4452GM
Emission Controls listed	EM
Engine Build Date	-
Fuel	Gasoline
EPA Regs Certified to	2022
Emission Controls Observed	-
Owner Code	
Used or New?	New

Imported?	Unknown (label says “Made in Canada”)
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Inspection #	8
Date	3/7/23
Inspection Photos	138-169 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Portable Generator
Brand	TMG Industrial
Equipment Manufacturer	TMG Industrial
Model	TMG-12000GE
VIN	32842210129 (Equipment), 2209211301 (Engine)
Equipment Build Date	-
ECI Label	Found/ Not removable
Company on ECI	Chongqing AM Pride Power & Machine Co., Ltd.
EFN	NCPPS.4592GC
Emission Controls listed	EM
Engine Build Date	September 2022
Fuel	Gasoline
EPA Regs Certified to	2022 non-road small SI/ Not for sale in CA
Emission Controls Observed	-
Owner Code	
Used or New?	New
Imported?	Unknown (label says made in China)

Inspection #	9
Date	3/7/23
Inspection Photos	170-188 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Portable Generator
Brand	Powertek
Equipment Manufacturer	Chongqing Dajiang Power Equipment Co., Ltd.
Model	DG9250E
VIN	DH420/ 22041103539
Equipment Build Date	2022
ECI Label	Found/ Not removable
Company on ECI	Ducar/ Chongqing Dajiang Power Equipment Co., Ltd.
EFN	NCDPS.4572DJ
Emission Controls listed	EM
Engine Build Date	April 2022
Fuel	Gasoline
EPA Regs Certified to	2022 non-road small SI

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Emission Controls Observed	-
Owner Code	
Used or New?	New
Imported?	Yes

Inspection #	10
Date	3/7/23
Inspection Photos	189-199 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Grass Trimmer
Brand	Matt
Equipment Manufacturer	Qianjiang Group Wenling Jennfeg Industry Inc.
Model	Matt Engine Tech./ SOWST4317/ JF1E40FA-12
VIN	21051304G0427
Equipment Build Date	-
ECI Label	Found/ Not removable
Company on ECI	Qianjiang Group Wenling Jennfeg Industry
EFN	KWJFS.0434G
Emission Controls listed	TWC
Engine Build Date	-
Fuel	Gasoline
EPA Regs Certified to	2019
Emission Controls Observed	-
Owner Code	
Used or New?	New
Imported?	Unknown

Inspection #	11
Date	3/7/23
Inspection Photos	200-214 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Off highway motorcycle
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	RT200 Realtree
VIN	2105120235/L9NLTNYC5M1510720 (Equipment)/ 168G2104290282 (Engine)
Equipment Build Date	September 2021
ECI Label	Found/ Not removable
Company on ECI	Tao Motor

EFN	MTMMX.212DB1
Emission Controls listed	EM
Engine Build Date	
Fuel	Gasoline
EPA Regs Certified to	2021 off highway motorcycles
Emission Controls Observed	-
Owner Code	██████
Used or New?	
Imported?	Yes (by ██████)

Inspection #	12
Date	3/7/23
Inspection Photos	200-214 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Off highway motorcycle
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	RT200 Realtree
VIN	L9NLTNYCOM1510351 (Equipment)/ 168G2105120235 (Engine)
Equipment Build Date	September 2021
ECI Label	Found/ Not removable
Company on ECI	Tao Motor
EFN	MTMMX.212DB1
Emission Controls listed	EM
Engine Build Date	
Fuel	Gasoline
EPA Regs Certified to	2021 off highway motorcycles
Emission Controls Observed	-
Owner Code	██████
Used or New?	
Imported?	Yes (by ██████)

Inspection #	13-18
Date	3/7/23
Inspection Photos	215-254 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Off highway motorcycle
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles Co. Ltd.
Model	RT100 Realtree

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Inspection Date: 03/06/2023- 03/07/2023

VIN	L8NLTEZCON1501956/ 154F2201050537/L9NLTEZC4NN1501863/ L9NLTEZC9N1501826/ L9NLTEZC4N1500678/ L9NLTEZC2M1504016/ L9NLTEZC7N1501842
Equipment Build Date	December 2021/ November 2021
ECI Label	Found/ Not removable
Company on ECI	Tao Motor
EFN	NTMMX.105DB1/ MTMMX.105DB1
Emission Controls listed	EM
Engine Build Date	-
Fuel	Gasoline
EPA Regs Certified to	2022/2021 Off highway motorcycles
Emission Controls Observed	-
Owner Code	
Used or New?	New
Imported?	Yes (by)

Inspection #	19
Date	3/7/23
Inspection Photos	255-261 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Remote Lawn Mower
Brand	LANM
Equipment Manufacturer	Chongqing Dajiang Power Co., Ltd.
Model	LAM750
VIN	-
Equipment Build Date	-
ECI Label	Found/ removable
Company on ECI	Ducar/ Chongqing Dajiang Power Co., Ltd.
EFN	MCDPS.2001DJ
Emission Controls listed	EM
Engine Build Date	May 2021
Fuel	Gasoline
EPA Regs Certified to	2021
Emission Controls Observed	-
Owner Code	
Used or New?	Used
Imported?	Unknown

Inspection #	20
Date	3/7/23
Inspection Photos	262-277 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	ATV
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	T125
VIN	TZ152FMH211101663
Equipment Build Date	November 2021
ECI Label	Found/ not removable
Company on ECI	Tao Motor
EFN	NTMMX.120ATA
Emission Controls listed	EM
Engine Build Date	-
Fuel	Gasoline
EPA Regs Certified to	2022 all-terrain vehicles
Emission Controls Observed	-
Owner Code	████████
Used or New?	Unknown
Imported?	Yes (████████)

Inspection #	21
Date	3/7/23
Inspection Photos	278-287 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	ATV
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	B110 SK
VIN	L9NACFB32N1601144 (Equipment)/ TZ152FMH220200367 (Engine)
Equipment Build Date	February 2022
ECI Label	Found/ Not removable
Company on ECI	Tao Motor
EFN	NTMMX.120ATA
Emission Controls listed	EM
Engine Build Date	-
Fuel	Gasoline
EPA Regs Certified to	2022 all-terrain vehicles
Emission Controls Observed	-
Owner Code	████████
Used or New?	Unknown

Ritchie Brothers Auctioneers/ Ritchie Brothers Auctioneers – Fort Worth Texas
Inspection Date: 03/06/2023- 03/07/2023

Imported?	Yes [REDACTED]
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Inspection #	22
Date	3/7/23
Inspection Photos	288-307 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Dirt Bike
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	DB14 Red
VIN	L9NYCFBC3M1502197 (vehicle)/ TZ152FMH210813238 (engine)
Equipment Build Date	-
ECI Label	Found/ Not removable
Company on ECI	Tao Motor
EFN	MTMMX.124DB1
Emission Controls listed	EM
Engine Build Date	-
Fuel	Gasoline
EPA Regs Certified to	2021 off-highway motorcycles
Emission Controls Observed	-
Owner Code	[REDACTED]
Used or New?	Unknown
Imported?	Yes [REDACTED]

Inspection #	23
Date	3/7/23
Inspection Photos	309-314 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Go kart
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	RTK200 Realtree
VIN	L9NATNT92M1603309 (Equipment), 168F/P-12011285318 (Engine)
Equipment Build Date	October 2021
ECI Label	Found/ Not removable
Company on ECI	Chongqing Dinking Power Machinery Co., Ltd.
EFN	LCHDS.2231EM
Emission Controls listed	EM
Engine Build Date	November 2020
Fuel	Gasoline
EPA Regs Certified to	2020 small non-road SI

Emission Controls Observed	-
Owner Code	
Used or New?	New
Imported?	Yes

Inspection #	24
Date	3/7/23
Inspection Photos	315-320 (Cannon)
Inspectors	Mario Jorquera and Victor Aguilar
Type of equipment	Go kart
Brand	Tao Motor
Equipment Manufacturer	Zhejiang Taotao Vehicles
Model	RTK100 Realtree
VIN	L9NATDT55M1405363 (Equipment), 156F/P-12107200624 (Engine)
Equipment Build Date	-
ECI Label	Found/ Not removable
Company on ECI	Chongqing Dinking Power Machinery Co., Ltd.
EFN	MCHDS.0981EC
Emission Controls listed	TWC+PAIR
Engine Build Date	July 2021
Fuel	Gasoline
EPA Regs Certified to	2021 small non-road SI
Emission Controls Observed	-
Owner Code	
Used or New?	New
Imported?	Yes

Section III – AREAS OF CONCERN

Inspection 1 – No ATS system found on the 2017 piece of equipment, but ECI label claims the engine is part of the TPEM program under 40 CFR 1039.625. The “A” in the engine family name identifies the engine as Tier 3 compliant. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 4 – A review of the language on ECI labels found in the engine compartment of the 2007 JLG Telehandler indicated that the engine was manufactured March 2008 and that the engine was certified as an export only non-road compression ignition engine. EPA also observed the absence of any emission controls on the engine or equipment. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 5 – An inspection of the undercarriage of the 2019 Ford F450 diesel pickup truck revealed that all the after-treatment systems were removed and replaced with a straight pipe. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 6 – EPA inspectors were unable to locate the Emission Control Information label on the engine or anywhere else in the engine compartment of the 2012 Dodge Ram 5500 diesel pickup truck. EPA proceeded to inspect the undercarriage of the pickup truck and observed a straight pipe installed, instead of after-treatment emission controls. It is known that Dodge Ram Diesel Pickup trucks of this model type and model year were manufactured with after-treatment systems installed. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 7 – An inspection of the undercarriage of the 2011 Dodge Ram 3500 diesel pickup truck revealed that all the after-treatment systems were removed and replaced with a straight pipe. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 8 – An inspection of the undercarriage of the 2010 Ford F350 diesel pickup truck and revealed that the after-treatment systems were removed and replaced with a straight pipe. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 1A (Day 2) – EPA inspectors observed that the mini excavators had an EPA seal attached to the side of the equipment, which is unusual because the US EPA does not endorse products. Mr. Worthy commented that these kinds of Chinese made mini excavators have just recently started coming into his auction site and that he dislikes them because he doesn't believe the engine installed in them is strong enough to perform the tasks of an excavator.

Inspection 1 (Day 2) - EPA inspectors were unable to locate any after-treatment system emission controls on the 2020 XCMG Excavator and could not take a legible picture of the ECI label because it was in an inaccessible part of the engine. EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 2 (Day 2) – It is unclear whether the diesel engine in the 2022 mini excavator could comply with 2022 non-road EPA emission standards without an after-treatment system. EPA will check with Kubota to confirm that this is their engine and EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 3 (Day 2) – EPA inspectors observed that the mini excavators had an EPA seal attached to the side of the equipment, which is unusual because the US EPA does not endorse products.

Inspection 3A/4 (Day 2) - It is unclear if the 2019 non-road diesel engine in the Telehandler could comply with 2019 non-road EPA emission standards without an after-treatment system.

Inspection 5 (Day 2) – EPA inspectors reviewed the ECI label on the Cummins engine in the 2018 XCMG roller and noticed that the engine family name was “323”. This is not a valid engine family name. EPA will check with Cummins to confirm the compliance status of this engine and EPA inspectors may ask

Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 6 (Day 2) – Upon review of the ECI label on the Cummins engine in the 2017 XCMG roller, EPA inspectors noticed that it was a 2011 engine which was installed in the used piece of equipment. This may explain why the EPA inspectors did not observe any after-treatment systems installed in engine. EPA will check with Cummins to confirm the compliance status of this engine and EPA inspectors may ask Ritchie Brothers for the seller and or importer information of this piece of equipment in a follow up action.

Inspection 19 (Day 2) – While inspecting the remote lawn mower, EPA inspectors were able to locate and remove the ECI label, without destroying the label itself. EPA inspectors will contact the engine manufacturer, Chongqing Dajiang Power Equipment, and notify them of their peeling labels.

Section IV – FOLLOW UP

EPA will be requesting additional information on the equipment cited above for which the inspectors found possible concerns.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 320 photos taken on 3/7/23 with the Cannon camera (IMG_0735-IMG_1058.JPG); 81 photos taken on 3/6/23 with the Nikon camera (DSCN1527-DSCN1607)

Appendix 2 – CBI Claim Document signed by Regional Operations Manager at Ritchie Brothers Auctioneers – Fort Worth Texas, Kolby Worthy on 3/07/2023

Appendix 3 – 208 Preservation Letter, date of receipt 3/07/2023, signed by EPA inspector Mario Jorquera