



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C., 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
And ELECTRONIC MAIL

Lone Star Auto Parts  
d/b/a EGR-Parts.com, lone-star-auto-part, moonsport-auto-parts, and silverautoparts  
Jing Lin Agent of Service  
20444 Westfield Commerce Drive  
Katy, Texas 77449  
[angel.lin.usa@gmail.com](mailto:angel.lin.usa@gmail.com)

Re: Notice of Violation of the Clean Air Act

Dear Jing Lin:

The United States Environmental Protection Agency (EPA) has investigated and continues to investigate Lone Star Auto Parts, d/b/a EGR-Parts.com, lone-star-auto-part, moonsport-auto-parts, and silverautoparts (EGR-Parts) for compliance with the Clean Air Act (“CAA” or “the Act”), 42 U.S.C. §§ 7401–7671q, and its implementing regulations. As summarized in this Notice of Violation, EPA has determined that EGR-Parts offered for sale, or caused the offer for sale of, parts or components for motor vehicle engines that bypass, defeat, or render inoperative devices or elements of design installed on motor vehicles and motor vehicle engines to meet emission standards promulgated under the CAA, and knew or should have known that these parts or components were offered for sale or installed for such use or put to such use. Therefore, EGR-Parts has violated Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B). EPA continues to investigate these violations and other potential violations under the Act and its implementing regulations.

Law Governing Alleged Violations

This Notice of Violation arises under Part A of Title II of the Act, 42 U.S.C. §§ 7521–7554, and the regulations promulgated thereunder. These laws were enacted to reduce air pollution from mobile sources of air pollution. In creating the Act, Congress found, in part, that “the increasing use of motor vehicles . . . has resulted in mounting dangers to the public health and welfare.”<sup>1</sup> Congress’ purpose in creating the Act, in part, was “to protect and enhance the quality of the Nation’s air resources so as to promote the public health and welfare and the productive capacity of its population,” and “to initiate and

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<sup>1</sup> CAA § 101(a)(2), 42 U.S.C. § 7401(a)(2).

accelerate a national research and development program to achieve the prevention and control of air pollution.”<sup>2</sup>

EPA’s allegations concern parts or components for motor vehicles and engines subject to emission standards.<sup>3</sup> The Act requires EPA to prescribe and revise, by regulation, standards applicable to the emission of any air pollutant from new motor vehicles or engines that cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare.<sup>4</sup> As required by the Act, the emission standards “reflect the greatest degree of emission reduction achievable through the application of [available] technology.”<sup>5</sup> Motor vehicles and engines are subject to specific emission standards for each pollutant, based on a vehicle’s or engine’s class and model year.<sup>6</sup>

Vehicle and engine manufacturers employ many devices and elements of design to meet emission standards. *Element of design* means “any control system (*i.e.*, computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine.”<sup>7</sup> For example, manufacturers often employ retarded fuel injection timing systems as a primary emission-related element of design to achieve reduction of emissions of oxides of nitrogen (NOx) and particulate matter (PM). Manufacturers also employ certain hardware devices as emission control systems and elements of design to reduce emissions of regulated pollutants into the ambient air. Examples of such devices include sensors, filtration systems such as diesel particulate filter (DPF) systems, also referred to as periodic trap oxidizers, exhaust gas recirculation (EGR) systems, the crankcase emission control system that reroutes crankcase gases back into the air intake, and catalyst devices such as diesel oxidation catalyst (“DOC,” also referred to as “CAT”) systems, NOx adsorption catalysts, and selective catalytic reduction<sup>8</sup> (SCR) systems. Modern vehicles and engines are equipped with devices known as electronic control modules, also referred to as electronic control units. ECMs continuously monitor engine and other operating parameters and control the emission control devices, such as the fueling strategy.

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

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<sup>2</sup> CAA § 101(b)(1)–(2), 42 U.S.C. § 7401(b)(1)–(2).

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

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

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

<sup>6</sup> See, e.g., heavy-duty diesel engine emission standards at 40 C.F.R. §§ 86.004-11, 86.007-11, 86.099-11 and light-duty vehicle emission standards at 40 C.F.R. § 86.1811-04. See also 40 C.F.R. §§ 86.090-8 (1990 and later model year light-duty vehicles); 86.094-9 (1994 and later model year light-duty trucks); 86.001-9 (2001 and later model year light-duty trucks); 86.004-9 (2004 and later model year light-duty trucks); 86.091-10 (1991 and later model year Otto-cycle heavy-duty engines and vehicles); 86.008-10 (2008 and later model year Otto-cycle heavy-duty engines and vehicles).

<sup>7</sup> 40 C.F.R. § 86.094-2.

<sup>8</sup> SCR systems include diesel emission fluid injections and tank storage components.

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

to prompt repair of a missing or malfunctioning emission-related device or element of design. Given these functions, the OBD is a key part of a motor vehicle's emission control system.

To ensure that every new motor vehicle or motor vehicle engine sold, offered for sale, imported, delivered for introduction into commerce, or introduced into commerce in the United States (collectively, "introduced into commerce") satisfies applicable emission standards, EPA runs a certification program for manufacturers. Under this program, the EPA issues certificates of conformity (COCs), thereby qualifying motor vehicles and engines for introduction into commerce.<sup>10</sup> To obtain a COC, an original equipment manufacturer must submit a COC application to the EPA for each engine family (also referred to as test group) and each model year in which it intends to manufacture or import motor vehicles or engines for introduction into commerce. The COC application must include, among other things, identification of the covered engine family, a description of the motor vehicle or engine and its emission control systems, all auxiliary emission control devices (AECDs)<sup>11</sup> and the engine parameters they sense, as well as test results from a test vehicle or engine showing that it satisfies the applicable emission standards.<sup>12</sup> The motor vehicles or motor vehicle engines must then be manufactured exactly as described in the approved COC application, in part to ensure that the emission control systems function as described.

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

### Alleged Violations

EPA has determined that EGR-Parts has offered for sale, or caused the offering for sale, numerous products (commonly referred to as "Defeat Devices") that have a principal effect of bypassing, defeating, or rendering inoperative emission control devices or elements of design certified to control emissions on motor vehicles or motor vehicle engines. EGR-Parts's website lists Defeat Devices which are intended for use with a variety of motor vehicles and motor vehicle engines including, but not limited to, light-duty diesel trucks and engines manufactured by entities such as FCA US LLC and its predecessors General Motors Co., Ford Motor Co., as well as heavy-duty diesel engines manufactured by entities such as Cummins Corporation.

EGR-Parts has sold three main categories of these "Defeat Device" products: (1) hardware parts or components that physically remove, disable, or bypass one or more components of the EGR system installed on or in a motor vehicle or motor vehicle engine (EGR Delete Parts); (2) parts or components that physically replace certified exhaust aftertreatment emission control devices or elements of design,

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<sup>10</sup> 40 C.F.R. § 86.007-30.

<sup>11</sup> An AECD is "any element of design which senses temperature, vehicle speed, engine RPM, transmission gear, manifold vacuum, or any other parameter for the purpose of activating, modulating, delaying, or deactivating the operation of any part of the emission control system." 40 C.F.R. § 86.082-2.

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

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

<sup>14</sup> CAA § 203(a), 42 U.S.C. § 7522(a).

such as the DPF, DOC, and/or SCR, from the exhaust system installed on or in a motor vehicle or motor vehicle engine (“Exhaust Aftertreatment Delete Pipes); and (3) hardware designed to replace the stock crankcase emission control equipment by rerouting crankcase gases to the atmosphere instead of back to the intake (“Crankcase Ventilation Delete Hardware”).

Between July 2023 and August 2023, EPA conducted a review of EGR-Parts’s website for advertisements of Defeat Devices. EPA considers each offer for sale of a Defeat Device through EGR-Parts’s website to be a violation of the CAA.

As listed in Table 1 below, EPA’s review of the EGR-Parts.com website found that EGR-Parts offered for sale, or caused the offer of sale, of 51 unique Defeat Devices, including 38 EGR Delete Parts; 4 Crankcase Ventilation Delete Hardware, and 9 Exhaust Aftertreatment Delete Pipes. These Defeat Devices are listed below.

**Table 1: Defeat Devices Offered for Sale on EGR-Parts.com Website**

#	SKU	Product Name	Defeat Device Category
1	LSOT00645	<u>EGR Valve Cooler Kit For 2008-2010 Ford F-250 F-350 F-450 F-550 Powerstroke 6.4L V8 Diesel Turbo</u>	ERG Delete Parts
2	LSOT00646	<u>EGR Delete Kit For 2003-2007 Ford Excursion F-Series F-250 F-350 F-450 F-550 E-E-350 E-450 6.0L Powerstroke Diesel</u>	ERG Delete Parts
3	LSOT00616	<u>EGR Complete Delete Kit For 2003-2010 Ford F-250 F-350 F-450 F-550 6.0L Powerstroke Diesel</u>	ERG Delete Parts
4	LSOT00644	<u>EGR Delete Kit For 2011 - 2022 Ford F250 F350 6.7L Powerstroke Diesel</u>	ERG Delete Parts
5	LSOT00355	<u>EGR Valve Delete Kit + Intake Elbow Diecast For 2008-2010 Ford F-250 F-350 F-450 Powerstroke Diesel 6.4L</u>	ERG Delete Parts
6	LSOT001290B	<u>CCV Crank Case Breather Kit (Hose Not Included) For Ford 6.7L Powerstroke</u>	Crankcase Ventilation Delete Hardware
7	LSOT00538	<u>EGR Delete Kit with Coolant For 2011 - 2019 Ford F-250 F-350 Super Duty Powerstroke Diesel 6.7L</u>	ERG Delete Parts
8	LSOT001290A	<u>CCV Crank Case Ventilation Kit (Hose Included) For Ford 6.7L Powerstroke</u>	Crankcase Ventilation Delete Hardware
9	LSOT001144	<u>EGR Coolant Valve Delete Kit Fits 2020-2021 Ford Powerstroke 6.7L F-250 F-350 F-450 F-550</u>	ERG Delete Parts

10	LSTUFD003 + LSOT00644	<u>EGR Valve &amp; Cooler Kit + Delete Cold Side InterCooler Pipe Upgrade Kit For 2011-2016 Ford F-250 F-350 F-450 Super Duty 6.7L Powerstroke Diesel</u>	ERG Delete Parts
11	LSOT00585	<u>4" Cat Delete Exhaust Pipe For 2008-2010 Ford 6.4L V8 Powerstroke Diesel F-250 F-350 F-450 F-550 Super Duty</u>	Exhaust Aftertreatment Delete Pipes
12	LSOT00588	<u>Muffler and Cat Delete Pipe Kit w/ Camps For 2003-2007 Ford 6.0L V8 Powerstroke F-250 F-350 Super Duty</u>	Exhaust Aftertreatment Delete Pipes
13 & 14	LSOT00646 + LSOT00588	<u>EGR Cooler Delete Kit + Muffler &amp; Cat Delete Exhaust Pipe Kit For 2003-2007 Ford F-250 F-350 Super Duty 6.0L V8 Powerstroke Diesel</u>	Delete Package (EGR Delete Parts and Exhaust Aftertreatment Delete Pipes)
15 & 16	LSOT00355 + LSOT00585	<u>Off Road 4" Exhaust Pipe &amp; EGR Valve Delete Kit + Intake Elbow DIECAST For 2008-2010 Ford F Powerstroke Diesel 6.4L</u>	Delete Package (EGR Delete Parts and Exhaust Aftertreatment Delete Pipes)
17	LSOT00356 + LSOT00588	<u>Muffler &amp; Cat Delete Exhaust Pipe + Coolant Filtration Filter Kit For 2003-2007 Ford F-250 F-350 Super Duty Powerstroke 6.0L</u>	Exhaust Aftertreatment Delete Pipes
18	LSOT00650	<u>PCV Reroute And Resonator Delete Disable Kit For 2004.5-2010 Chevy GMC Duramax 6.6L Diesel LLY LBZ LMM</u>	Crankcase Ventilation Delete Hardware
19	LSOT00650B	<u>PCV Reroute And Resonator Delete Kit (Hose Included) For 2004.5-2010 Chevy GMC Duramax 6.6L Diesel LLY LBZ LMM</u>	Crankcase Ventilation Delete Hardware
20	LSOLGM007	<u>EGR Valve Cooler Delete Kit For 2011-2015 GMC Chevy 6.6L V8 Duramax LML Diesel</u>	EGR Delete Parts
21	LSOT00642	<u>6.6L Duramax Diesel LLY Cooler Cover Plate Kit For 2004.5-2005 Chevrolet Silverado 2500HD 3500 GMC Sierra 2500 HD</u>	EGR Delete Parts
22	LSOT001230	<u>EGR Valve Cooler Delete Kit For 2007.5-2010 Chevy GMC LMM Duramax 6.6L Diesel</u>	EGR Delete Parts
23	LSOT00617	<u>EGR Delete Kit High Flow Intake For 2004 2005 Chevy Silverado 2500HD/3500 LLY 6.6L GMC Sierra 2500HD/3500 Duramax Diesel</u>	EGR Delete Parts

24	LSO2LGM006	<u>EGR Delete Kit Upgraded High Flow Fits 2006.4-2007 Chevy GMC 6.6L Duramax Diesel</u>	EGR Delete Parts
25	LSOT00336	<u>EGR Delete Duramax Diesel High Flow Intake Inlet Pipe Kit Fits 2007-2010 GMC Chevy 6.6L</u>	EGR Delete Parts
26	LSOT001009 + LSOLGM007	<u>High Flow Intake Elbow Intake Bridge Pipe Kit + EGR Valve Cooler Delete Kit For 2011-2015 GMC Chevy Duramax 6.6L LML</u>	EGR Delete Parts
27	LSOLGM006 + LSOT00650	<u>EGR Delete LBZ High Flow Intake Elbow Kit + PCV Reroute &amp; Resonator delete Kit For 2006.4 2007 Chevy GMC 6.6L Duramax</u>	EGR Delete Parts
28	LSOT00586	<u>Stainless Steel Exhaust Muffler Delete Pipe Fits 2011-2015 Chevrolet Silverado GMC Sierra 2500HD 3500HD 6.6L Duramax Diesel</u>	Exhaust Aftertreatment Delete Pipes
29 & 30	LSOT00586 + LSOLGM007	<u>Exhaust Muffler Pipe &amp; EGR Valve Cooler Delete Kit For 2011-2015 Chevy Silverado GMC Sierra 6.6L Duramax LML Diesel</u>	Delete Package (EGR Delete Parts and Exhaust Aftertreatment Delete Pipes)
31	LSOT00598	<u>EGR Valve Cooler Delete Kit For 2014- 2017 Dodge Ram 1500 V6 3.0L EcoDiesel</u>	EGR Delete Parts
32	LSOT00357B	<u>Red EGR Throttle Valve Delete Tube Kit For 2007-2017 Dodge Ram 6.7L Cummins Diesel</u>	EGR Delete Parts
33	LSOT00357	<u>Black EGR Throttle Valve Delete Kit For 2007- 2017 Dodge Ram 6.7L Cummins Diesel Turbo</u>	EGR Delete Parts
34	LSOT00360	<u>EGR Delete Kit For 2013-2018 Dodge Ram 3500 4500 5500 6.7L Diesel Cummins Cab &amp; Chassis</u>	EGR Delete Parts
35	LSOT00354	<u>EGR Delete Kit Fits Dodge Ram 2500 3500 6.7L L6 Cummins 2010 - 2014 Diesel</u>	EGR Delete Parts
36	LSOT00359	<u>6.7L Cummins Diesel EGR Delete Valve Cooler Kit For 2010 -2012 Dodge Ram 2500 3500</u>	EGR Delete Parts
37	LSOT00643	<u>EGR Delete Kit For 2007-2009 Dodge Ram 2500 3500 6.7L L6 Cummins Diesel Turbo</u>	EGR Delete Parts
38	LSOT00647	<u>EGR Delete and Valve Kit For 2013 - 2018 Dodge Ram 6.7L Cummins Diesel</u>	EGR Delete Parts

39 & 40	LSOT00360 + LSOT00357	<u>EGR Delete Cooler Kit &amp; Black Throttle Valve Delete Kit For 2013-2017 Ram 3500 Cab &amp; Chassis 6.7L Cummins</u>	EGR Delete Parts
41 & 42	LSOT00357 + LSOT00359	<u>EGR Delete Valve Cooler Kit &amp; Black EGR Throttle Valve Kit For 2010-2012 Dodge Ram 2500 3500 6.7L Cummins Diesel</u>	EGR Delete Parts
43 & 44	LSOT00357 + LSOT00643	<u>EGR Delete Valve Cooler Kit &amp; Black EGR Throttle Valve Kit For 2007-2009 Dodge Ram 2500 3500 L6 6.7L Diesel Cummins</u>	EGR Delete Parts
45	LSOT00584	<u>EGR Delete Exhaust Straight Pipes Fits 2013 -2017 Dodge Ram 2500 3500 4500 5500 6.7L Cummins Diesel</u>	EGR Delete Parts
46 & 47	LSOT00359 + LSOT00584	<u>Muffler Pipe Delete Kit + EGR Delete Valve Cooler Kit For Dodge Ram 2500 3500 4500 5500 6.7L Cummins Diesel Truck</u>	Delete Package (EGR Delete Parts and Exhaust Aftertreatment Delete Pipes)
48 & 49	LSOT00354 + LSOT00584	<u>EGR Delete Exhaust Pipes &amp; EGR Cooler Throttle Valve Delete Kit Fits 2013 2014 Dodge Ram 2500 3500 6.7L L6 Cummins Diesel</u>	EGR Delete Parts
50 & 51	LSOT00584 + LSOT00360	<u>Muffler Pipe &amp; EGR Delete Kit For 2013-2017 Ram 3500 4500 5500 6.7L Cummins Diesel</u>	Delete Package (EGR Delete Parts and Exhaust Aftertreatment Delete Pipes)

The Defeat Devices identified in Table 1 each have a principal effect to bypass, defeat, or render inoperative devices or elements of design installed on or in a motor vehicle or motor vehicle engine in compliance with Title II of the CAA.

EGR-Parts knew or should have known that these products were offered for sale or sold, to bypass, defeat, or render inoperative elements of design that control emissions of regulated air pollutants from motor vehicles or motor vehicle engines.

EGR-Parts's advertising for many of the Defeat Devices offered for sale on its website prominently state in the product name, description, and/or posted customer product reviews that such products facilitate the removal, bypass, or "deletion" of a diesel truck's emission control devices or elements of design. Several examples of these statements published on EGR-Parts's website include the following excerpts:

**Example 1:**

**Benefits of EGR delete**

Sep 25th 2022

You may ask why people always choose an EGR delete solution. Actually the EGR valve reduces engine efficiency. And EGR cooler is used for lowering the temperature of the burnt gases before they are recirculated back into the engine. If your truck is not okay with EGR system, I mean, if they fail, that can result in the need for costly repairs. After the EGR delete and custom ECU tuning, your vehicle will function as it has an EGR without any error messages.

Here are the benefits of EGR delete:

- More horsepower, increased fuel economy, and long-term use. EGR valve will no longer limit the engine performance. Your engine is going to be a lot more powerful. At the same time it will burn less fuel to deliver the same amount of power. This will help your engine have a longer lifespan.
- Cleaner emissions
- Improve gas flow
- Preventing from costly EGR repairs and replacements. Save big money!

Note: The EGR delete kits are not sale or used on any pollution controlled vehicle in California. The customer is responsible for all penalties and fines for removing any emissions equipment.

**Example 2:**

CARAMORE

**EGR Cooler Delete Kit + Muffler & Cat Delete Exhaust Pipe Kit For 2003-2007 Ford F-250 F-350 Super Duty 6.0L V8 Powerstroke Diesel**

No reviews yet [Write a Review](#)

SKU: LSOT00646 + LSOT00588

**\$199.00**

Quantity:

Same Day Shipping

**Add to Cart**



## Description

### Fits:

- 2003-2007 Ford F-250 Super Duty 6.0L 363CID V8 Diesel OHV Turbocharged, VIN CODE "P"
- 2003-2007 Ford F-350 Super Duty 6.0L 363CID V8 Diesel OHV Turbocharged, VIN CODE "P"

### Package Includes:

- 1x Cat delete straight exhaustpipe kit -stainless steel made
- 1x EGR Cooler Delete Kit
- Everything in the pics

### Example 3:



CARAMORE

**EGR Delete Kit For 2013-2018 Dodge Ram 3500 4500 5500 6.7L Diesel Cummins Cab & Chassis**

★★★★★ [2 reviews](#) [Write a Review](#)

SKU: LSOT00360

**SALE**

Was: ~~\$49.00~~

**\$45.99**

Condition: New

Quantity:

1

Same Day Shipping

## Description

### Fits:

- 2013-2018 Dodge Ram 3500 Cab & Chassis 6.7L Cummins Diesel
- 2013-2018 Dodge Ram 4500 Cab & Chassis 6.7L Cummins Diesel
- 2013-2018 Dodge Ram 5500 Cab & Chassis 6.7L Cummins Diesel

### Package Includes:

- 1x EGR Delete Kit
- No Instruction Included
- As shown in the picture

## 2 Reviews

Posted by Nelson Vaughn on Apr 5th 2023



**Quick response and my order arrived home super fast**

Tip: tuner needed

In sum, the EPA finds that EGR-Parts offers to sell, or causes the offer of sale, of easily identifiable Defeat Devices on its website.

### Enforcement

EPA may bring an enforcement action for these violations, and other violations it identifies, under its administrative authority or by referring this matter to the United States Department of Justice with a recommendation that a civil complaint be filed in federal district court.<sup>15</sup> Persons violating Section 203(a)(3)(B) of the Act, 42 U.S.C. § 7522(a)(3)(B), are subject to an injunction under Section 204 of the Act, 42 U.S.C. § 7523, and a civil penalty of up to \$5,580 for each violation.<sup>16</sup> Each part or component manufactured, sold, offered for sale, or installed in violation of Section 203(a)(3)(B) is a separate violation. 42 U.S.C. § 7524(a).

Note that EPA has not completed its investigation to identify and catalogue every Defeat Device offered for sale on EGR-Parts' website during the review timeframe of July 2023 to August 2023. Our investigation of EGR Parts' compliance with the CAA continues. Each Defeat Device sold is a separate violation subject to penalties under the CAA. Simultaneously with this Notice of Violation, the Agency

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<sup>15</sup> CAA §§ 204 and 205, 42 U.S.C. §§ 7523, 7524.

<sup>16</sup> CAA § 205(a), 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4.

is issuing a Request for Information to EGR-Parts pursuant to Sections 114(a)(1) and 208(a) of the CAA, 42 U.S.C. §§ 7414(a)(1) and 7542(a), to obtain sales and other information concerning the Defeat Devices identified in this Notice of Violation as well as information regarding additional product EGR-Parts has sold or offered for sale.

EPA requests that you immediately cease sale of the 45 Defeat Devices identified above, as well as any other parts, tunes, or components capable of defeating, bypassing, or rendering inoperative any emission control systems or elements of design of motor vehicles. Thereafter, please provide the following statement, signed by an authorized company official:

*I hereby certify that, as of [DATE], all employees of Lone Star Auto Parts, d/b/a EGR-Parts.com, lone-star-auto-part, moonsport-auto-parts, and silverautoparts (EGR-Parts) , were instructed not to sell any parts, tunes, or components capable of defeating, bypassing, or rendering inoperative any emission control systems or elements of design on motor vehicles, and, to the best of my knowledge and belief, EGR-Parts has not manufactured or sold, or offered to sell, or installed any such parts since [DATE].*

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

to:

Mark J. Palermo  
Chief, Vehicle and Engine Enforcement Branch  
Office of Enforcement and Compliance Assurance  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
William Jefferson Clinton Federal Building, Room 1109-B  
Washington, DC 20460

EPA is available to discuss this matter with you in further detail upon your request. Please contact Mark J. Palermo, Chief, Vehicle and Engine Enforcement Branch, within 15 days of receipt of this Notice of Violation. Mr. Palermo can be reached at (202) 564-8894 or palermo.mark@epa.gov.

Sincerely,

Greene,  
Mary E

Digitally signed by  
Greene, Mary E  
Date: 2023.09.28  
11:59:11 -04'00'

Mary E. Greene, Director  
Air Enforcement Division  
United States Environmental Protection Agency

**CERTIFICATE OF MAILING**

I, Nathan Dancher, certify that on this day I sent this Notice of Violation of the Clean Air Act, by certified mail, return receipt requested to:

Lone Star Auto Parts  
d/b/a EGR-Parts.com, lone-star-auto-part, moonsport-auto-parts, and silverautoparts  
Jing Lin, Agent of Service  
20444 Westfield Commerce Drive  
Katy, Texas 77449

And at the email address: [Angel.lin.usa@gmail.com](mailto:Angel.lin.usa@gmail.com)

**NATHAN  
DANCHER**  Digitally signed by  
NATHAN DANCHER  
Date: 2023.09.29  
10:50:49 -04'00'

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Nathan Dancher  
Environmental Engineer  
Air Enforcement Division  
United States Environmental Protection Agency  
[Dancher.nathan@epa.gov](mailto:Dancher.nathan@epa.gov)