

UNITED STATES DEPARTMENT OF COMMERCE  
BUREAU OF INDUSTRY AND SECURITY  
WASHINGTON, D.C. 20230

In the Matter of:

Envirotech Pump Systems, Inc.  
8625 Grant Road  
St. Louis, Missouri 63123

Respondent

ORDER RELATING TO  
ENVIROTECH PUMP SYSTEMS, INC.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified Envirotech Pump Systems, Inc., of St. Louis, Missouri (“Envirotech”), of its intention to initiate an administrative proceeding against Envirotech pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),<sup>1</sup> and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),<sup>2</sup> through the issuance of a Proposed Charging Letter to Envirotech that alleges that Envirotech committed thirty-two violations of the Regulations. Specifically, the charges are:

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<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The violations alleged occurred in 2007-2011. The Regulations governing the violation at issue are found in the 2007-2011 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2007-2011). The 2015 Regulations govern the procedural aspects of this case.

<sup>2</sup> 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46,959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq.) (2006 & Supp. IV 2010).

**Charges 1-32     15 C.F.R. § 764.2(a): Unlicensed Exports of Items Controlled for Reasons of Chemical and Biological Weapons Proliferation**

On thirty-two occasions between on or about December 17, 2007, and on or about July 19, 2011, Envirotech engaged, through its Lewis Pumps Division d/b/a Weir Minerals Lewis Pumps, in conduct prohibited by the Regulations. Specifically, Envirotech exported globe, gate and butterfly valves, items classified under Export Classification Control Number (ECCN) 2B350, controlled for reasons of chemical and biological weapons proliferation, and valued in total at approximately \$1.4 million, to China, Russia, and various other destinations without the Department of Commerce licenses required by Section 742.2 of the Regulations.

In so doing, Envirotech committed thirty-two violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and Envirotech have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, Envirotech shall be assessed a civil penalty in the amount of \$500,000. The payment of \$150,000 shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions. Payment of the remaining \$350,000 shall be suspended for a period of two years from the date of the Order, and thereafter shall be waived, provided that during this two-year payment probationary period under the Order, Envirotech has committed no violation of the Act, or any regulation, order, license or authorization issued thereunder and has made full and timely payment of \$150,000 as set forth above.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due date specified herein, Envirotech will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, Envirotech shall complete two audits of its export controls compliance program. The results of the audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, Chicago Field Office, One Oakbrook Terrace, Suite 804, Oakbrook Terrace, Illinois, 60181, ("BIS Chicago Field Office"). The first audit shall cover the 12-month period prior to the date of the Order, and the related report shall be due to the BIS Chicago Field Office no later than three (3) months from the date of the Order. The second audit shall cover the 12-month period beginning on the date of the Order, and the related report shall be due to the BIS Chicago Field Office no later than fifteen (15) months from the date of the Order. Said audit shall be in substantial compliance with the Export Management and Compliance Program (EMCP) sample audit module, and shall include an assessment of Envirotech's compliance with the Regulations. The EMCP sample audit module is available on the BIS web site at [http://www.bis.doc.gov/index.php/forms-documents/doc\\_download/1256-emcp-guidelines-november-2013](http://www.bis.doc.gov/index.php/forms-documents/doc_download/1256-emcp-guidelines-november-2013). In addition, where said audit identifies actual or potential violations of the Regulations, Envirotech shall promptly provide copies of the pertinent air waybills and other export control documents and supporting documentation to the BIS Chicago Field Office.

FOURTH, that the full and timely payment of the civil penalty agreed to in Paragraph 2.a and the timely completion of the audits and submission of the audit results in Paragraph 2.b, are hereby made conditions to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Envirotech. Failure to make full and timely payment of the civil penalty or to submit the audit results as set forth above, may result in the denial of all of Envirotech's export privileges under the Regulations for one year from the date of the failure to make such payment or submit such audit results.

FIFTH, Envirotech shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or the Order. The foregoing does not affect Envirotech's testimonial obligations in any proceeding, nor does it affect its right to take legal or factual positions in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

SIXTH, that the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.

  
David W. Mills  
Assistant Secretary of Commerce  
for Export Enforcement

Issued this 22<sup>nd</sup> day of July, 2015.

UNITED STATES DEPARTMENT OF COMMERCE  
BUREAU OF INDUSTRY AND SECURITY  
WASHINGTON, D.C. 20230

In the Matter of:

Envirotech Pump Systems, Inc.  
8625 Grant Road  
St. Louis, Missouri 63123

Respondent

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Envirotech Pump Systems, Inc., of St. Louis, Missouri (“Envirotech”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),<sup>1</sup> issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).<sup>2</sup>

WHEREAS, Envirotech filed a voluntary self-disclosure with BIS’s Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein;

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<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The violations alleged occurred in 2007-2011. The Regulations governing the violation at issue are found in the 2007-2011 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2007-2011). The 2015 Regulations govern the procedural aspects of this case.

<sup>2</sup> 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46,959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, et seq.) (2006 & Supp. IV 2010).

WHEREAS, BIS has notified Envirotech of its intentions to initiate an administrative proceeding against Envirotech, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a Proposed Charging Letter to Envirotech that alleges that Envirotech committed thirty-two violations of the Regulations, specifically:

**Charges 1-32      15 C.F.R. § 764.2(a): Unlicensed Exports of Items Controlled for Reasons of Chemical and Biological Weapons Proliferation**

On thirty-two occasions between on or about December 17, 2007, and on or about July 19, 2011, Envirotech engaged, through its Lewis Pumps Division d/b/a Weir Minerals Lewis Pumps, in conduct prohibited by the Regulations. Specifically, Envirotech exported globe, gate and butterfly valves, items classified under Export Classification Control Number (ECCN) 2B350, controlled for reasons of chemical and biological weapons proliferation, and valued in total at approximately \$1.4 million, to China, Russia, and various other destinations without the Department of Commerce licenses required by Section 742.2 of the Regulations.

In so doing, Envirotech committed thirty-two violations of Section 764.2(a) of the Regulations.

WHEREAS, Envirotech has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions that could be imposed against it if the allegations are found to be true;

WHEREAS, Envirotech fully understands the terms of this Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, Envirotech enters into this Agreement voluntarily and with full knowledge of its rights, after having consulted with counsel;

WHEREAS, Envirotech states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, Envirotech neither admits nor denies the allegations contained in the Proposed Charging Letter; and



WHEREAS, Envirotech agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over Envirotech, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.

2. The following sanctions shall be imposed against Envirotech in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:

a. Envirotech shall be assessed a civil penalty in the amount of \$500,000. The payment of \$150,000 shall be made to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions. Payment of the remaining \$350,000 shall be suspended for a period of two years from the date of the Order, and thereafter shall be waived, provided that during this two-year payment probationary period under the Order, Envirotech has committed no violation of the Act, or any regulation, order, license or authorization issued thereunder and has made full and timely payment of \$150,000 as set forth above.

b. Envirotech shall complete two audits of its export controls compliance program. The results of the audit, including any relevant supporting materials, shall be submitted to the Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement, Chicago Field Office, One Oakbrook Terrace, Suite 804, Oakbrook Terrace, Illinois, 60181, ("BIS Chicago Field Office"). The first audit shall cover the 12-month period prior to the date of the

Order, and the related report shall be due to the BIS Chicago Field Office no later than three (3) months from the date of the Order. The second audit shall cover the 12-month period beginning on the date of the Order, and the related report shall be due to the BIS Chicago Field Office no later than fifteen (15) months from the date of the Order. Said audit shall be in substantial compliance with the Export Management and Compliance Program (EMCP) sample audit module, and shall include an assessment of Envirotech's compliance with the Regulations. The EMCP sample audit module is available on the BIS web site at [http://www.bis.doc.gov/index.php/forms-documents/doc\\_download/1256-emcp-guidelines-november-2013](http://www.bis.doc.gov/index.php/forms-documents/doc_download/1256-emcp-guidelines-november-2013). In addition, where said audit identifies actual or potential violations of the Regulations, Envirotech shall promptly provide copies of the pertinent air waybills and other export control documents and supporting documentation to the BIS Chicago Field Office.

c. The full and timely payment of the civil penalty agreed to in Paragraph 2.a and the timely completion of the audits and submission of the audit results in Paragraph 2.b, are hereby made conditions to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Envirotech. Failure to make full and timely payment of the civil penalty or to submit the audit results as set forth above, may result in the denial of all of Envirotech's export privileges under the Regulations for one year from the date of the failure to make such payment or submit such audit results.



3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, Envirotech hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued. Envirotech also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter or in connection with collection of the civil penalty or enforcement of this Agreement and the Order, if issued, from the date of the Order until the later of the date Envirotech pays in full the civil penalty agreed to in Paragraph 2.a of this Agreement or has completed and submitted the audit results in Paragraph 2.b.

4. Envirotech shall not take any action or make or permit to be made any public statement, directly or indirectly, denying the allegations in the Proposed Charging Letter or the Order. The foregoing does not affect Envirotech's testimonial obligations in any proceeding, nor does it affect its right to take legal or factual positions in civil litigation or other civil proceedings in which the U.S. Department of Commerce is not a party.

5. BIS agrees that upon full and timely payment of the civil penalty as set forth in Paragraph 2.a and completion and submission of the audit in Paragraph 2.b, BIS will not initiate any further administrative proceeding against Envirotech in connection

with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

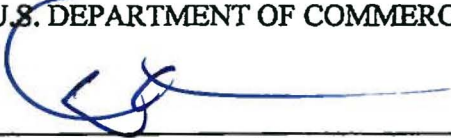
7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.


9. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

10. Each signatory affirms that he/she has authority to enter into this Settlement Agreement and to bind his/her respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND  
SECURITY  
U.S. DEPARTMENT OF COMMERCE

  
\_\_\_\_\_  
Douglas R. Hassebrock  
Director of Export Enforcement


ENVIROTECH PUMP SYSTEMS, INC.

  
\_\_\_\_\_  
Robert Elliot  
CEO/President

Date: 20 Jul 15

Date: 7/14/2015

Reviewed and approved by:

  
\_\_\_\_\_  
Robert A. Shapiro, Esq.  
Thompson Coburn LLP  
Counsel for Envirotech Pump Systems, Inc.

Date: 7/14/2015

PROPOSED CHARGING LETTER

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Envirotech Pump Systems, Inc.  
8625 Grant Road  
St. Louis, Missouri 63123

*Attention: Robert Elliot  
CEO/President*

Dear Mr. Elliot:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that Envirotech Pump Systems, Inc., of St. Louis, Missouri (“Envirotech”), committed thirty-two (32) violations of the Export Administration Regulations (the “Regulations”),<sup>1</sup> which issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).<sup>2</sup> Specifically, BIS alleges that Envirotech committed the following violations:

**Charges 1-32      15 C.F.R. § 764.2(a): Unlicensed Exports of Items Controlled for Reasons of Chemical and Biological Weapons Proliferation**

As described in greater detail in the attached Schedule of Violations, which is incorporated herein by reference, on thirty-two occasions between on or about December 17, 2007, and on or about July 19, 2011, Envirotech engaged, through its Lewis Pumps Division d/b/a Weir Minerals Lewis Pumps, in conduct prohibited by the Regulations. Specifically, Envirotech exported globe, gate and butterfly valves, items classified under Export Classification Control Number (ECCN) 2B350, controlled for reasons of chemical and biological weapons proliferation, and valued in total at approximately \$1.4 million, to China, Russia, and various other destinations without the Department of Commerce licenses required by Section 742.2 of the Regulations.

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<sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2015). The violations alleged occurred in 2007-2011. The Regulations governing the violation at issue are found in the 2007-2011 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774 (2007-2011). The 2015 Regulations govern the procedural aspects of this case.

<sup>2</sup> 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 7, 2014 (79 Fed. Reg. 46,959 (Aug. 11, 2014)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*) (2006 & Supp. IV 2010).

In so doing, Envirotech committed thirty-two violations of Section 764.2(a) of the Regulations.

\* \* \* \* \*

Accordingly, Envirotech is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation, or twice the value of the transaction that is the basis of the violation;<sup>3</sup>
- Denial of export privileges;
- Exclusion from practice before BIS; and/or
- Any other liability, sanction, or penalty available under law.

If Envirotech fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6 and 766.7. If Envirotech defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Envirotech. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Envirotech is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. Envirotech is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Envirotech have a proposal to settle this case, Envirotech should transmit it to the attorney representing BIS named below.

Envirotech is further notified that under the Small Business Regulatory Enforcement Flexibility ACT, Envirotech may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

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<sup>3</sup> *See* International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

Envirotech Pump Systems, Inc.  
Proposed Charging Letter  
Page 3 of 5

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Envirotech's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center  
40 S. Gay Street  
Baltimore, Maryland 21202-4022

In addition, a copy of Envirotech's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security  
Attention: R. Elizabeth Abraham  
Room H-3839  
14th Street and Constitution Avenue, N.W.  
Washington, D.C. 20230

R. Elizabeth Abraham is the attorney representing BIS in this case; any communications that Envirotech may wish to have concerning this matter should occur through her. Ms. Abraham may be contacted by telephone at (202) 482-5301.

Sincerely,

Douglas R. Hassebrock  
Director  
Office of Export Enforcement

**Schedule of Violations**

<b>Charge No.</b>	<b>Invoice Date</b>	<b>Commodities</b>	<b>ECCN</b>	<b>Destination</b>	<b>Value</b>	<b>Violation</b>
1	12/17/2007	Various Globe, Gate and Butterfly Valves	2B350	China	\$86,731	15 C.F.R. 764.2(a)
2	1/8/2008	Various Globe, Gate and Butterfly Valves	2B350	Zambia	\$70,482	15 C.F.R. 764.2(a)
3	4/22/2008	Various Globe, Gate and Butterfly Valves	2B350	Chile	\$66,110	15 C.F.R. 764.2(a)
4	4/29/2008	Various Globe, Gate and Butterfly Valves	2B350	Brazil	\$61,980	15 C.F.R. 764.2(a)
5	5/3/2008	Various Globe, Gate and Butterfly Valves	2B350	China	\$141,742	15 C.F.R. 764.2(a)
6	7/16/2008	Various Globe, Gate and Butterfly Valves	2B350	Lebanon	\$53,790	15 C.F.R. 764.2(a)
7	8/18/2008	Various Globe, Gate and Butterfly Valves	2B350	Russia	\$9,198	15 C.F.R. 764.2(a)
8	11/16/2008	Various Globe, Gate and Butterfly Valves	2B350	Morocco	\$67,316	15 C.F.R. 764.2(a)
9	12/8/2008	Various Globe, Gate and Butterfly Valves	2B350	Saudi Arabia	\$10,585	15 C.F.R. 764.2(a)
10	12/10/2008	Various Globe, Gate and Butterfly Valves	2B350	Congo	\$17,960	15 C.F.R. 764.2(a)
11	12/19/2008	Various Globe, Gate and Butterfly Valves	2B350	Singapore	\$20,619	15 C.F.R. 764.2(a)
12	1/19/2009	Various Globe, Gate and Butterfly Valves	2B350	Morocco	\$90,603	15 C.F.R. 764.2(a)
13	3/31/2009	Various Globe, Gate and Butterfly Valves	2B350	Peru	\$31,331	15 C.F.R. 764.2(a)
14	4/22/2009	Various Globe, Gate and Butterfly Valves	2B350	Zambia	\$47,665	15 C.F.R. 764.2(a)
15	4/30/2009	Various Globe, Gate and Butterfly Valves	2B350	Philippines	\$4,498	15 C.F.R. 764.2(a)
16	6/18/2009	Various Globe, Gate and Butterfly Valves	2B350	China	\$74,370	15 C.F.R. 764.2(a)
17	7/30/2009	Various Globe, Gate and Butterfly Valves	2B350	Lebanon	\$83,849	15 C.F.R. 764.2(a)
18	9/1/2009	Various Globe, Gate and Butterfly Valves	2B350	China	\$61,580	15 C.F.R. 764.2(a)
19	12/31/2009	Various Globe, Gate and Butterfly Valves	2B350	Egypt	\$41,670	15 C.F.R. 764.2(a)
20	4/7/2010	Various Globe, Gate and Butterfly Valves	2B350	Brazil	\$58,461	15 C.F.R. 764.2(a)
21	5/7/2010	Various Globe, Gate and Butterfly Valves	2B350	Mexico	\$22,220	15 C.F.R. 764.2(a)
22	5/25/2010	Various Globe, Gate and Butterfly Valves	2B350	Russia	\$9,538	15 C.F.R. 764.2(a)
23	6/3/2010	Various Globe, Gate and Butterfly Valves	2B350	Jordan	\$13,024	15 C.F.R. 764.2(a)



<b>Charge No.</b>	<b>Invoice Date</b>	<b>Commodities</b>	<b>ECCN</b>	<b>Destination</b>	<b>Value</b>	<b>Violation</b>
24	6/15/2010	Various Globe, Gate and Butterfly Valves	2B350	Taiwan	\$17,460	15 C.F.R. 764.2(a)
25	8/11/2010	Various Globe, Gate and Butterfly Valves	2B350	Zambia	\$50,020	15 C.F.R. 764.2(a)
26	8/20/2010	Various Globe, Gate and Butterfly Valves	2B350	Malawi	\$37,833	15 C.F.R. 764.2(a)
27	10/10/2010	Various Globe, Gate and Butterfly Valves	2B350	Jordan	\$91,864	15 C.F.R. 764.2(a)
28	1/21/2011	Various Globe, Gate and Butterfly Valves	2B350	Tunisia	\$11,340	15 C.F.R. 764.2(a)
29	1/21/2011	Various Globe, Gate and Butterfly Valves	2B350	Jordan	\$10,100	15 C.F.R. 764.2(a)
30	2/28/2011	Various Globe, Gate and Butterfly Valves	2B350	Chile	\$15,436	15 C.F.R. 764.2(a)
31	7/15/2011	Various Globe, Gate and Butterfly Valves	2B350	Morocco	\$15,755	15 C.F.R. 764.2(a)
32	7/19/2011	Various Globe, Gate and Butterfly Valves	2B350	China	\$4,670	15 C.F.R. 764.2(a)