

Exhibit I-3

Scope of Investigation

SCOPE

The merchandise covered by this investigation is cold water gas powered pressure washers (also commonly known as power washers), which are machines that clean surfaces using water pressure that are powered by an internal combustion engine, air-cooled with a power take-off shaft, in combination with a positive displacement pump. This combination of components (*i.e.*, the internal combustion engine, the power take-off shaft, and the positive displacement pump) is defined as the “power unit.” The scope of the investigation covers cold water gas powered pressure washers, whether finished or unfinished, whether assembled or unassembled, and whether or not containing any additional parts or accessories to assist in the function of the “power unit,” including, but not limited to, spray guns, hoses, lances, and nozzles. The scope of the investigation covers cold water gas powered pressure washers, whether or not assembled or packaged with a frame, cart, or trolley, with or without wheels attached.

For purposes of this investigation, an unfinished and/or unassembled cold water gas powered pressure washer consists of, at a minimum, the power unit or components of the power unit, packaged or imported together. Importation of the power unit whether or not accompanied by, or attached to, additional components including, but not limited to a frame, spray guns, hoses, lances, and nozzles constitutes an unfinished cold water gas powered pressure washer for purposes of this scope. The inclusion in a third country of any components other than the power unit does not remove the cold water gas powered pressure washer from the scope. A cold water gas powered pressure washer is within the scope of this investigation regardless of the origin of its engine. Subject merchandise also includes finished and unfinished cold water gas powered pressure washers that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of this investigation if performed in the country of manufacture of the in-scope cold water gas powered pressure washers.

Cold water gas powered pressure washers are easily distinguishable from hot water gas powered pressure washers and have different physical characteristics. While a hot water pressure washer also includes an engine and a pump, it must also include a boiler to heat the water as it leave the pump. The boiler also includes a heating coil. The boiler needs a separate energy source such as natural gas, butane, propane, kerosene or diesel fuel. In addition, it needs a burner system to ignite the boiler. Hot water pressure washers are generally larger in size than cold water pressure washers due to the need for the boiler. The scope does not include hot water gas powered pressure washers.

Also specifically excluded from the scope of this investigation is merchandise covered by the scope of the antidumping and countervailing duty orders on certain vertical shaft engines between 99cc and Up to 225cc, and parts thereof from the People’s Republic of China. *See Certain Vertical Shaft Engines Between 99 cc and Up to 225cc, and Parts Thereof from the People’s Republic of China: Antidumping and Countervailing Duty Orders*, 86 FR 023675 (May 4, 2021).

The cold water gas powered pressure washers subject to this investigation are classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings 8424.30.9000 and

8424.90.9040. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope is dispositive.

Exhibit I-4

Production Process

PRODUCTION PROCESS OF GAS POWERED PRESSURE WASHERS ("GPPW")

A GPPW consists of a frame, engine, pump, and spraying components (i.e., handle kit assembly, the high-pressure hose, gun, lance, and nozzle set). The primary steps to manufacture a GPPW are fabrication, assembly, and finishing of the frame; mounting the pump to the engine on the lower half of the frame; testing and calibration of the unit; and packaging the unit and needed accessories for shipment to retail or direct sales customers.

GPPW production begins with the fabrication and/or assembly of the frame, also referred to as the cart or trolley.¹ While some manufacturers purchase frame components and perform only assembly operations, other more vertically integrated producers manufacture the frame components from raw steel, and paint and assemble the components into the finished frame. GPPW frames are composed of a lower base assembly and a handle assembly.² Lower base assembly fabrication is typically the first step in the GPPW manufacturing process and involves a series of processes whereby a raw steel input is bent, punched and swedged. The engine mounting plate, a separate component, commonly referred to as the base or engine mounting plate, is stamped. After processing, the parts are painted and can be either welded or bolted together. When welded, the frame tubing is welded to the engine plate and, in some cases an axle tube is also welded to the frame tube.³ Handle assembly fabrication also involves a series of processes whereby the raw steel input is formed into a handle that mates to the lower base, punched, swedged and painted.⁴ The dashboard, a separate component, is stamped and painted and assembled to the handle using four fasteners.⁵ In some cases, the handle assembly will also receive a hose hanger, gun hanger and nozzle holder.⁶

¹ See [] Declaration.

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

GPPW assembly entails the lower half of the unit and begins with the pump being mounted to the engine. The engine shaft is []]. Next, the pump is directly coupled to the engine. The engine shaft power take-off (“PTO”) is received by a mating pump of the same PTO diameter.⁷ The engine and pump each have [

]. The finished assembly is then installed onto the lower base frame assembly vis-à-vis [] mounting holes that fasten the engine and the frame together.⁸ This assembly process is applicable to both vertical and horizontal shaft engine GPPWs. However, in a vertical shaft engine GPPW, the engine plate is sandwiched between the engine and the pump with the engine above the plate and the pump connected to the engine at the bottom of the assembly below the engine plate. The engine and pump are fastened together using the [

]. In a horizontal shaft unit, while the engine plate is also located below the engine, the pump is connected to the engine at the top of the assembly.

Typically, the wheels are also installed on the frame at this time. However, in some cases, to save assembly time and packaging costs for consumer models, a manufacture can choose not to install the wheels and include the detached wheels inside the retail box for end-user installation.⁹

Once the lower half of the unit is complete, each unit is tested and calibrated for performance.¹⁰ Gasoline and oil are added to the engine and pump oil is poured into the pump,¹¹ and the unit is run through a series of protocols and calibrated under high pressure

⁷ *Id.* Two diameters of PTO - 3/4” or 1” inch diameter shafts - are typical for general purpose engines.

⁸ *See id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ For purchased pumps, the pump oil typically is already added by the manufacturer.

and by-pass modes.¹² The engine is started and the no-load rpm - i.e., the speed of the shaft without the water exiting the unit - is tested to meet the manufacturer’s tolerance range. Once speed is determined, the trigger is engaged to produce high pressure water and the load rpm, water pressure and flow are measured. Load rpm is tested to determine the level of speed droop to ensure stable engine operation. Water pressure (measured in pounds per square inch or “PSI”) and flow (measured in gallons per minute or “GPM”) are measured at the head of the manifold or pump to determine compliance with performance targets and safety considerations. Where necessary, the unloader knob is adjusted to calibrate flow and to account for performance variation. Next, the trigger is released to stop the water flow and by-pass pressure is calculated to ensure that trapped line pressure is at the targeted measure.¹³ If a chemical injector is integrated into the pump, the suction rate is also measured using a special soap dispensing nozzle. Upon all working/performance parameters being met, the fluids are drained from the engine and the machine is cleaned. The unit receives a unique serial number and product labels indicating branding, performance specifications, operating instructions and warnings are added.¹⁴ If any of the testing parameters are not met, the unit is sent for further investigation and correction.¹⁵

There are two GPPW working standards – that established by the Pressure Washer Manufacturers’ of America (“PWMA”) and the stricter standards established by the Cleaning Equipment Trade Association (“CETA”).¹⁶ However, GPPW manufacturers are not required to meet either standard. Certification to either or both standards occurs on a case-by-basis

¹² See [] Declaration.

¹³ This varies by manufacturer. While []

¹⁴ See [] Declaration.

¹⁵ See *id.*

¹⁶ See Pressure Washer Manufacturers’ Association (“PWMA”), *Standard For Testing And Rating Performance Of Pressure Washers: Determination Of Pressure And Water Flow* (2016); CETA, *Performance Standard CPC100* (2018); Excerpt from CETA website, “*CPC 100 Performance Standard*” (All attached as **Exhibit II-18**).

with certain manufacturers undertaking the necessary testing and others forgoing certification all together.¹⁷

During the final “pack out” process the unit is placed in a box. Depending on the customer and the destination, the unit is placed in either a retail package box used for shipment to the store for in-store customer purchase, or in a direct to end-user box used for parcel or truck delivery service.¹⁸ The direct to end user box has additional special materials inside to ensure safe delivery in transport.¹⁹ Once the machine is in the box, the handle kit assembly, the high-pressure hose, gun, lance, nozzle set, motor oil and manual are packed, and the box is sealed.²⁰

¹⁷ For example, to certify to CETA standards manufacturers must perform additional load/non-load rpm testing to determine how much reserve power is left in the engine. CETA also requires the nozzle and flow specifications to match and performance standards (i.e., PSI and GPM) to fall within a plus or minus 10 percent tolerance range. *See Exhibit II-18.* [

¹⁸].
See [] Declaration.

¹⁹ *Id.*

²⁰ *Id.*