



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

JUL 25 2019

CERTIFIED MAIL NO: 7015 3010 0000 3883 5376  
RETURN RECEIPT REQUESTED

Fiona Wang dba  
Long Time Trading Co., Ltd.  
8767 Rochester Avenue  
Rancho Cucamonga, CA 91730

Re: Docket No. R9-CAA-19-1018

Dear Fiona Wang:

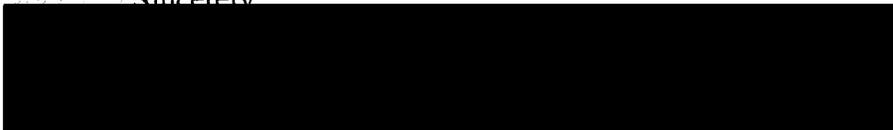
An authorized representative of the United States federal government conducted an inspection to determine your company's compliance with the Clean Air Act (CAA) and regulations promulgated thereunder. The details of this inspection are outlined in the enclosed Clean Air Act Mobile Source Expedited Settlement Agreement (Agreement). As a result of the inspection, it was determined that your company failed to comply with the CAA and the associated regulations. The Agreement describes the violations.

You may resolve violations using an expedited process that involves significantly lower penalties than those sought through the normal settlement process. The United States Environmental Protection Agency (EPA) is authorized to enter into the Agreement under the authority vested in the EPA Administrator by Section 205(c)(1) of the CAA, 42 U.S.C. § 7524(c)(1). After the Agreement becomes effective, the EPA will take no further civil penalty action against you for the violation(s) described in the Agreement. However, the EPA does not waive any rights to take an enforcement action for any other past, present, or future violations of the CAA or of any other federal statute or regulation.

If you do not sign and return the enclosed Agreement as presented within **30 calendar days** of its receipt, and meet all of your obligations under the Agreement, the proposed Agreement is withdrawn, with no need of additional notice to you, and without prejudice to the EPA's ability to file any other enforcement action for the violation(s) identified in the Agreement and seek

penalties of up to \$47,357 per violation pursuant to 40 C.F.R. § 19.4. Please refer to "CAA Vehicle and Engine Expedited Settlement Agreement Instructions," attached, for instructions on accepting this Agreement. If you have any questions, please call Matt Salazar at 415-972-3982.

Sincerely,



Claire Trombadore, Assistant Director  
Enforcement and Compliance Assurance Division  
U.S. EPA Region 9

Enclosure

**Enclosure**  
**CLEAN AIR ACT MOBILE SOURCE EXPEDITED SETTLEMENT AGREEMENT**

DOCKET NO. R9-CAA-19-1018

Respondent: Ms. Fiona Wang dba  
Longtime Trading Co., Ltd.

1. The parties enter into this Clean Air Act Vehicle and Engine Expedited Settlement Agreement (Agreement) in order to settle the civil violations discovered as a result of the inspection specified in Table 1, attached, incorporated into this Agreement by reference. The civil violations that are the subject of this Agreement are described in Table 2, attached, incorporated into the Agreement by reference, regarding the engines specified therein.
2. Respondent admits to being subject to the Clean Air Act (CAA) and its associated regulations and that the United States Environmental Protection Agency (EPA) has jurisdiction over the Respondent and the Respondent's conduct described in Table 2. Respondent neither admits nor denies the findings detailed therein, and waives any objections Respondent may have to the EPA's jurisdiction.
3. Respondent certifies that payment of the penalty has been made in the amount of \$1,300. Respondent has followed the instructions in "CAA Vehicle and Engine Expedited Settlement Agreement Instructions," attached, incorporated into this Agreement by reference. Respondent certifies that the required remediation, specified in Table 3 and incorporated into this Agreement by reference, has been carried out.
4. By its first signature below, the EPA approves the findings resulting from the inspection and alleged violations set forth in Table 1 and Table 2. Upon signing and returning this Agreement to the EPA, Respondent consents to the terms of this Agreement without further notice. Respondent acknowledges that this Agreement is binding on the parties signing below, and becomes effective on the date of the EPA Delegated Official's ratifying signature.
5. The parties consent to service of this Agreement by electronic delivery at the Respondent's email noted below.

APPROVED BY EPA:

[Redacted Signature]

Date: 7/25/2019

Claire Trombadore, Assistant Director, ECAD, U.S. EPA Region 9

APPROVED BY RESPONDENT:

Name (print): Fiona Wang

Title (print): Manager

Email (print): [Redacted]

Signature: [Redacted]

Date: 7/18/2019

RATIFIED BY EPA:

[Redacted Signature]

Date: 8/22/2019

Claire Trombadore, Assistant Director, ECAD, U.S. EPA Region 9

**Table 1 - Inspection Information**

<b>Entry/Inspection Date(s):</b>		<b>Docket Number:</b>	
6/20/2019		R 9 - C A A - 1 9 - 1 0 1 8	
<b>Inspection Location:</b>		<b>Entry/Inspection Number(s)</b>	
Imglobal Warehouse (Remote Inspection)		9 D Q - 0 0 3 5 7 6 1 1	
<b>Address:</b>			
785 Lindbergh Ct Suite 200			
<b>City:</b>		<b>Inspector Name:</b>	
Hebron		Nathan Dancher	
<b>State:</b>	<b>Zip Code:</b>	<b>EPA Approving Official:</b>	
KY	90745	Claire Trombadore	
<b>Respondent:</b>		<b>EPA Enforcement Contact:</b>	
Fiona Wang, dba Long Time Trading Co., Ltd.		Nathan Dancher - (415) 972-3482	

**Table 2 - Description of Violation and Vehicles/Engines**

Fiona Wang, doing business as Long Time Trading Co. Ltd. (Respondent) imported the engines described at the bottom of Table 2 (the Subject Engines) on or about May 12, 2019. An authorized federal inspector remotely examined the Subject Engines and did not find any emission control information (ECI) labels affixed to the engines. The inspector was not able to identify a known engine family for the Subject Engines, which are also not certified under an EPA certificate of conformity (COC). The Respondent did provide EPA with a certificate of conformity claiming it covered the Subject Engines, however the certificate was for an engine family covering non-handheld equipment, while the Subject Engines were handheld. The EPA has found no evidence indicating the Subject Engines are exempt or otherwise excluded from coverage under Title II of the Clean Air Act (CAA) and its implementing regulations. Accordingly, by importing the Subject Engines, Respondent has committed 100 violations of CAA Sections 203(a)(1) and 213(d), 42 U.S.C. §§ 7522(a)(1) and 7547(d), and the regulations codified at 40 C.F.R. §§ 1068.101(a)(1), and 1068.101(b)(5).

Vehicle Description	Claimed Engine Manufacturer	Observed Model	Observed Engine Family	Quantity
Gasoline Chainsaws	None Claimed	CHAIN SAW 4500	Unknown	100

**Table 3 - Penalty and Required Remediation**

Penalty	\$1,300
Required Remediation	In addition to paying the monetary penalty, Respondent must provide to the EPA documentation showing that the Subject Engines have been destroyed, exported to a country other than Canada or Mexico, or are under exclusive control by U.S. Customs and Border Protection (CBP) pending exportation or destruction.

## CAA MOBILE SOURCE EXPEDITED SETTLEMENT AGREEMENT INSTRUCTIONS

**Within 30 days from your receipt of the Agreement, you must pay the penalty as described below:**

**Payment method 1 – Preferred (electronic):** Pay online through the Department of the Treasury using WWW.PAY.GOV. In the Search Public Form field, enter SFO 1.1, click “EPA Miscellaneous Payments - Cincinnati Finance Center,” and complete the SFO Form Number 1.1. The payment shall be identified in the online system with the Docket Number listed below.

On the same day after submitting your payment, send an email to cinwd\_acctsreceivable @epa.gov and the EPA contact email address noted below. Include in the subject line: “Payment Confirmation for Longtime Trading Co. Ltd. Docket Number (R9-CAA-19-1018).” Attach a copy of the Agreement and your payment receipt to the email.

**Payment method 2 (check):** Mail, via CERTIFIED MAIL, a certified check payable to the United States of America marked with Longtime Trading Co., Ltd. and Docket Number (R9-CAA-19-1018), and with a photocopy of the signed Agreement, to:

U. S. Environmental Protection Agency Fines and Penalties  
Cincinnati Finance Center  
P.O. Box 979077  
St. Louis, MO 63197-9000  
Attn: Docket Number R9-CAA-19-1018

**Within 30 days from your receipt of the Agreement, you must email [Salazar.Matt@epa.gov](mailto:Salazar.Matt@epa.gov) a scanned copy of the original, signed Agreement, the documentation of your corrective action(s), and proof of payment (meaning, as applicable, a photocopy of the original certified penalty check or confirmation of electronic payment). If you prefer to mail this information via CERTIFIED MAIL, you may send it to:**

Matt Salazar, ENF-2-1  
U.S. Environmental Protection Agency Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

If you have any questions or would like to request an extension due to extraordinary circumstances, you may contact Matt Salazar at 415-972-3982. The EPA will consider whether to grant an extension on a case-by-case basis where appropriate justification is provided. The EPA will not accept or approve any Agreement returned more than 30 days after the date of your receipt of the Agreement unless an extension has been granted by the EPA. If you believe that the alleged violations are without merit (and you can provide evidence contesting the allegations), you must provide such information to the EPA as soon as possible but no later than 30 days from your receipt of the Agreement.

Unless an extension has been granted in writing by the EPA, if you do not sign and return the Agreement with proof of payment of the penalty amount and a report detailing your corrective action(s) within 30 days of your receipt of the Agreement, the Agreement is automatically withdrawn, without prejudice to the EPA's ability to file an enforcement action for the above or any other violations. Failure to return the Agreement within the approved time does not relieve you of the responsibility to comply fully with the regulations, including correction of the violations specifically identified in the enclosed Tables. If you choose not to enter into this Agreement and fully comply with its terms, the EPA may pursue more formal enforcement measures to correct the violations and seek penalties of up to \$47,357 per violation pursuant to 40 C.F.R. § 19.4.