

October 22, 2025 2:38 pm

USEPA – Region II
Regional Hearing Clerk



REGION 2

NEW YORK, N.Y. 10007

**CERTIFIED MAIL No.
RETURN RECEIPT REQUESTED**

Naomi Trading Co. Ltd.
Jianshe Su, Director & CEO
1031 S Broadway
Los Angeles, CA 90015

**Re: Clean Air Act Vehicle and Engine Expedited Settlement Agreement
Docket No. CAA-02-2026-1204**

Dear Naomi Trading Co. Ltd.:

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 Vehicle and Engine 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 these violations using an expedited settlement process that involves significantly lower penalties than those sought through the regular enforcement 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 your company 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 thirty **(30) calendar days** of its receipt, and meet all of your obligations under the Agreement, then the proposed Agreement will be withdrawn, with no need of additional notice to you, and without prejudice to the EPA's ability to file any other enforcement action for the violation(s) identified in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 \$59,114 per violation pursuant to Section 205(a) of the CAA, 42 U.S.C. § 7524(a), as adjusted for inflation, see 40 C.F.R. § 19.4. Please refer to the "CAA Vehicle and Engine Expedited Settlement Agreement Instructions," enclosed, for instructions on timely accepting and executing this Agreement.

Please contact Julian Velez at (212) 637-3464 or velez.julian@epa.gov with any questions.

Sincerely,

KATHLEEN
ANDERSON

Digitally signed by KATHLEEN
ANDERSON
Date: 2025.09.23 10:07:59
-04'00'

Kathleen Anderson, Director
Enforcement and Compliance Assurance Division

Enclosure

cc: Registered Agents Inc.
1401 21st Street Suite R
Sacramento, CA 95811

JL Customs Service LLC.
20418 East Walnut Drive North Units 1B & 1C
Diamond Bar, CA 91789
op11@jl-customservice.com

Enclosure

CLEAN AIR ACT VEHICLE AND ENGINE EXPEDITED SETTLEMENT AGREEMENT

Docket No. CAA-02-2026-1204

Respondent: Naomi Trading Co. Ltd.

1031 S Broadway

Los Angeles, CA 90015

1. The parties enter into this Clean Air Act Vehicle and Engine Expedited Settlement Agreement (Agreement) in order to settle the civil violation(s) discovered as a result of the inspection(s) specified in Table 1, enclosed, incorporated into this Agreement by reference. The civil violation(s) that are the subject of this Agreement are described in Table 2, enclosed, incorporated into the Agreement by reference, regarding the vehicle(s)/engine(s) 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 nine thousand one hundred forty-four dollars (**\$9,144**), and that Respondent has followed the instructions in the "CAA Vehicle and Engine Expedited Settlement Agreement Instructions," enclosed, 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 in full.
4. By its first signature below, the EPA approves the findings resulting from the inspection(s) and the alleged violation(s) 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 address noted below.

APPROVED BY EPA:

KATHLEEN
ANDERSON

Digitally signed by KATHLEEN
ANDERSON
Date: 2025.09.23 12:23:08 -04'00'

Delegated Official: Kathleen Anderson, Director
Enforcement and Compliance Assurance Division

APPROVED BY RESPONDENT:

Name (print): _____cindy_____

Title (print): _____OP_____

Signature: _____*cindy*_____

Date: _____2025.10.17_____

Email (print): _____document@link-trans.com_____

RATIFIED BY EPA:

Delegated Official: Douglas McKenna, Acting Director
Enforcement and Compliance Assurance Division

Table 1 - Inspection Information	
Inspection Date(s):	Docket Number:
July 11, 2025	0 2 - 2 0 2 6 - 1 2 0 4
Inspection Location Name:	Entry Number(s):
H&M Warehouse	8 T T - 1 9 9 4 0 2 3 - 1
Address:	Date of Entry Detention by CBP:
700 Belleville Turnpike	July 11, 2025
City:	Inspector(s) Name(s):
Kearny	CBPO Ryan
State:	EPA Approving Official:
NJ	Kathleen Anderson
Zip Code:	EPA Enforcement Contact:
07032	Julian Velez - (212) 637-3464
Importer Name (Respondent):	Richard Kan - (212) 637-4017
Naomi Trading Co. Ltd.	

Table 2 - Description of Violation and Vehicles/Equipment
Naomi Trading Co. Ltd. (Respondent) imported the engines described at the bottom of Table 2 (the Subject Engines) on or about June 16, 2025. Authorized federal inspectors examined the Subject Engines and did not observe any Emission Control Information (ECI) labels on the Subject Engines. The importer claimed these gas-powered chainsaws were covered under Disclaim Code A – product not regulated by the EPA. However, these products are regulated by the EPA and the disclaim code does not apply. Inspection photos and a review of the manufacturer’s website (proyamapower.com) indicate that there are two different models of gas-powered chainsaws in this shipment – PCS68 and PCS62. The engine size of model PCS68 is 68cc and the engine size of model PCS62 is 62cc. After initially attempting to disclaim these products using Disclaim Code A, the importer/broker submitted EPA form 3520-21 and claimed that both chainsaw models were covered under engine family name SZJTS.0525ZJ. This is inaccurate because the engine family name SZJTS.0525ZJ only covers engines that are 52cc, not the engine sizes of the chainsaw models in this shipment. In addition, no relevant Certificates of Conformity were found in EPA’s databases. The certificate holder for engine family SZJTS.0525ZJ is Zhejiang ZhongJian Technology Co. Ltd. A search of EPA’s EV-CIS confirms that this certificate holder has not certified a non-road spark ignition engine with an engine size of 62cc or 68cc. Proyama is not a certificate holder (i.e., it has not certified a product with the EPA). The EPA has found no evidence indicating the Subject Engines are certified, exempt or otherwise excluded from coverage under Title II the Clean Air Act (CAA) and its implementing regulations. Accordingly, by importing the Subject Engines, Respondent has committed one hundred and eighty (180) 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 (b)(5).

Vehicle/Equipment Description	Observed Engine Manufacturer	Observed Model Year	Observed Engine Family	Quantity
Proyama-Gasoline Chainsaws	Proyama	2025	None	180

Table 3 - Penalty and Required Remediation	
Penalty	\$9,144
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 VEHICLE AND ENGINE 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 Docket Number listed below.

On the same day, once you submit 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 Naomi Trading Co. Ltd. - Docket Number CAA-02-2026-1204.**" 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 **Naomi Trading Co. Ltd.**, and the Docket Number listed below, with a copy of the Agreement to:

U. S. Environmental Protection Agency
Government Lockbox 979078
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63101
Attn: Docket Number CAA-02-2026-1204

Within 30 days from your receipt of the Agreement, you must email velez.julian@epa.gov a scanned copy of the following:

- 1) the original signed Agreement,**
- 2) the documentation of your Required Remediation corrective action(s) taken, and**
- 3) 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 contact the EPA at the email listed below to confirm this arrangement (Note that mailed information must be postmarked within 30 days of your receipt of the Agreement).

If you have any questions or would like to request an extension due to extraordinary circumstances, you may contact Julian Velez at velez.julian@epa.gov. 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 in writing. 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 violation(s) 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 violation(s) and seek penalties of up to \$59,114 per violation pursuant to 40 C.F.R. § 19.4.