

December 1, 2025 4:19 pm

USEPA - Region II

Regional Hearing Clerk



REGION 2

NEW YORK, N.Y. 10007

CERTIFIED MAIL NO.

RETURN RECEIPT REQUESTED & VIA EMAIL

TPDA Trade Corp.
2533 Carla Dr.
Loveland, CO 80537-6171

**Re: Clean Air Act Vehicle and Engine Expedited Settlement Agreement
Docket No. CAA-02-2026-1203**

Dear TPDA Trade Corp.:

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days** of its receipt, and meet all of your obligations under the Agreement, then the proposed Agreement will be withdrawn, with no need of additional notice to you, and without prejudice to the EPA's ability to file any other enforcement action for the violation(s) identified in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 Richard Kan at (212) 637-4017 or Kan.Richard@epa.gov with any questions.

Sincerely,

KATHLEEN
ANDERSON

Digitally signed by KATHLEEN
ANDERSON
Date: 2025.09.23 10:05:01 -04'00'

Kathleen Anderson, Director
Enforcement and Compliance Assurance Division

Enclosure

cc: CCL Group Inc.
13195 Flores St
Santa Fe Springs, CA 90670
holly@cclchblax.com
roy@cclchblax.com
sunny@cclgroupinc.com

Enclosure
CLEAN AIR ACT VEHICLE AND ENGINE EXPEDITED SETTLEMENT AGREEMENT

DOCKET NO. CAA-02-2026-1203

Respondent: TPDA Trade Corp.
2533 Carla Dr.
Loveland, CO 80537-6171

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 two thousand five hundred and eighteen dollars (**\$2,518**), 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 e-mail address noted below.

APPROVED BY EPA:

KATHLEEN
ANDERSON

Digitally signed by KATHLEEN
ANDERSON
Date: 2025.09.23 12:34:15 -04'00'

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

APPROVED BY RESPONDENT:

Name (print): ZHOU ZHI CHAO

Title (print): ZHOU ZHI CHAO

Signature: 

Email (print): yue-4486@outlook.com

Date: 10/18/2025

RATIFIED BY EPA:

_____ *for*

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

Table 1 - Inspection Information	
Inspection Date(s):	Docket Number:
December 3, 2024	0 2 - 2 0 2 6 - 1 2 0 3
Inspection Location Name:	Entry Number(s):
H&M International Warehouse	8 U E - 0 1 8 5 1 8 7 - 1
Address:	Date of Entry Detention by CBP:
700 Bellville Turnpike	December 3, 2024
City:	Inspector(s) Name(s):
Kearny	CBPO Morello
State: Zip Code:	EPA Approving Official:
NJ 07032	Kathleen Anderson
Importer Name (Respondent):	EPA Enforcement Contact:
TPDA Trade Corp.	Richard Kan - (212) 637-4017 Julian Velez - (212) 637-3464

Table 2 - Description of Violation and Vehicles/Equipment				
TPDA Trade Corp (Respondent) imported the engines described at the bottom of Table 2 (the Subject Engines) on or about November 9, 2024. Authorized federal inspectors examined the Subject Engines and determined that they are uncertified and are not covered by an applicable Certificate of Conformity (COC). CBP did not observe Emission Control Information (ECI) labels on the Subject Engines. EPA reviewed photographs that CBP provided and did not observe the required ECI labels. When the importer was asked to provide complete information such as the Engine Family Names, Equipment Make & Model, etc. on the EPA Form 3520-21 for the Subject Engines, the importer’s broker stated that the importer is unable to provide this information and inquired whether CBP could destroy the equipment. In addition, EPA searched its EV-CIS database and did not find any applicable certifications held by the importer or manufacturer for the Subject Engines. Based on the above facts, EPA determined that the Subject Engines are not covered by a valid COC and are not certified. 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 82 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

Leaf Blowers, YLNXP7VWDML8- EH075	Unknown	Unknown	Unknown	5
Diesel Engines, BI-MLLCR-144-186FA YLNXYF5CWDML8-168F	Unknown	Unknown	Unknown	63
Gas Blowers, YLNXXIK-000600-139FA YLNXXIK-000700-1E40F- 5	Unknown	Unknown	Unknown	14

Table 3 - Penalty and Required Remediation	
Penalty	\$2,518
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 thirty (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 TPDA Trade Corp. - Docket Number CAA-02-2026-1203.**" Enclose 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 **TPDA Trade Corp.**, 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-02-2026-1203

Within thirty (30) days from your receipt of the Agreement, you must email Kan.Richard@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 phone number listed below to confirm this arrangement (Note that mailed information must be postmarked within thirty (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 Richard Kan at (212) 637-4017. 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 thirty (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 thirty (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 thirty (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 Section 205(a) of the CAA, 42 U.S.C. § 7524(a), as adjusted for inflation, see 40 C.F.R. § 19.4.