UNITED STATES ENVIRONMENTAL PROTECTION AGENCY BEFORE THE ADMINISTRATOR

In the Matter of:)	
)	
Taotao USA, Inc.,)	Docket No. CAA-HQ-2015-8065
Taotao Group Co., Ltd., and)	
Jinyun County Xiangyuan Industry Co., Ltd.)	
)	
Respondents.)	

NOTICE OF SERVICE

On the morning of December 30, 2015, Complainant filed its Response to Respondents' Motion to Quash and Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(5) ("Response"). The Response and its exhibits contain material claimed by Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd., (collectively "Respondents") to be confidential business information ("CBI") pursuant to 40 C.F.R. § 2.203(b). The Response was therefore filed under seal pursuant to 40 C.F.R. § 22.5(d). A redacted version of the Response with the CBI deleted was served on Respondents' counsel. Respondents subsequently provided Complainant with a signed, written authorization granting EPA counsel permission to share the CBI in the Response with Respondents' counsel, the Law Offices of William Chu. A copy of the written authorization is attached. On December 31, 2015, a copy of the unredacted Response was mailed to Respondents' counsel.

Date: 01/05/2016

Respectfully Submitted,

Edward Kulschinsky, Attorney Advisor

Air Enforcement Division Office of Civil Enforcement 1200 Pennsylvania Ave., NW Washington, DC 20460

(202) 564-4133

CERTIFICATE OF SERVICE

I certify that the foregoing Notice of Service and attachment ("Notice") in the Matter of Taotao USA, Inc., et al., were electronically filed and served on the presiding officer this day through the Office of Administrative Law Judges and Environmental Appeals Board's eFiling System.

I certify that a copy of the Notice was sent this day by certified mail, return receipt requested, for service on Respondents' counsel at the address listed below:

William Chu, Esq. The Law Offices of William Chu 4455 LBJ Freeway, Suite 909 Dallas, TX 75244

01/05/2016 Date

Edward Kulschinsky, Attorney Advisor

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DECEMBER 29, 2015

Edward Kulschinsky, Attorney-Advisor, U.S. Environmental Protection Agency Office of Enforcement and Compliance Assurance William Jefferson Clinton South Building, Room 1142C 1200 Pennsylvania Ave., NW Mail Code 2242A Washington, DC 20460

Via Email: Kulschinsky, Edward@epa.gov

Re:

Limited Waiver of CBI Claims for Certificate Applications

Docket No. CAA-HO-2015-8065

Our Client: Taotao USA, Inc.

Dear Mr. Kulschinsky:

Taotao USA Inc. hereby provides this written authorization granting EPA Counsel permission to share Confidential Business Information ("CBI") with the Law Offices of William Chu. This authorization acts as a limited waiver of Taotao USA Inc.'s CBI claims and allows EPA Counsel to present un-redacted versions of the EPA's Response to Respondents' Motion to Quash to the Law Offices of William Chu.

While Taotao USA Inc. is authorizing this limited waiver, this authorization does not withdraw Taotao USA Inc.'s desire to have the applications filed under seal, consistent with Rule 40 C.F.R. 22.5(d).

Additionally, this waiver releases any potential liability pursuant to 40 C.F.R. 2.211 against EPA Counsel, as a result of releasing the CBI to The Law Offices of William Chu.

Very truly yours.

JOHN STONE

Authorized Representative

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