

**ZKW Trading Corp.**

218 W. Garvey Ave., Suite 1, Monterey Park, CA 91754, USA  
Tel: 310-294-9378 Fax: 626-288-0010

September 28, 2009

Mr. Jim Polek, Environmental Engineer  
Waste Management Division  
U.S. Environmental Protection Agency, WST-3  
75 Hawthorne Street  
San Francisco, CA 94105

RE: Determination of Violation, Compliance Order, and Notice of Right to Request a Hearing, U.S.EPA Docket No.RCRA-09-2009-0017

Dear Sirs,

We refer to the captioned letter issued by your department dated September 3, 2009 and duly received by us on 9/3/2009 and 9/9/2009 respectively.

ZKW Trading Corporation (the company) was established in August 2005 by Mr. Robert Pang who was only an employee of the company; as a small overseas corporation in California, USA. The company is mainly doing trading business on buying merchandises from the States and shipped back Hong Kong for sales.

The merchandises include all kinds of used stuffs related to computer and electronic parts. The company bought and loaded the merchandises by containers and exported from the States back to Hong Kong.

These exported containers sometimes were loaded and mixed with CRT monitors. We do not realized that we are violated the rules and regulations of U.S. EPA by exporting the CRT monitors from the States.

We are now trying our efforts to remedy the consequence of these two containers (CCLU6332107 & CCLU6586924) mentioned in your letter.

However, we came across the following difficulties:

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1. We have not yet received the debit note from the US Custom relating to the examination and storage fees since August 5, 2009. Our estimated cost may be over \$10,000 for these two containers.
2. The per diem charges from the shipping company have been estimated over \$5,000 per container as advised by our forwarder.
3. After we have contacting a few recyclers in California, the standard handling fee per container will be around \$5-6,000; it means around \$11,000 for two containers. But still no recycler is willing to handle these containers.
4. With the above three points, we may have to be ready to pay over \$30,000 fees and charges; plus we may receive a penalty for citation for more than \$20,000 on violation of exporting and importing "hazardous waste" according to US EPA's rules and regulations.

After a result, we expect that we are **unable** to pay the unforeseeable fees, charges and penalty for more than \$50,000(or more than that amount later on).

We hereby inform you that we decide to abandon the captioned containers with immediate effect.

ZKW TRADING CORP.



Robert Pang

Cc: Ms. Rebecca Sugerman  
Mail Code: ORC-3  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105