

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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IN THE MATTER OF )  
 )  
 W AND E INTERNATIONAL )  
 TRADING COMPANY )  
 1534 Summerfield Drive )  
 Allen, Texas 75002-1859 )  
 )  
 MR. ZILIANG ZHU )  
 a.k.a. "Eric" Zhu )  
 d.b.a. W and E International )  
 Trading Company )  
 1534 Summerfield Drive )  
 Allen, Texas 75002-1859 )  
 )  
 SM METALS, L.L.C. )  
 1320 134<sup>th</sup> Street South )  
 Tacoma, Washington 98444 )  
 )  
 )  
 RESPONDENTS )  
 )  
 Proceeding under Section 3008(a) of the )  
 Resource Conservation and Recovery )  
 Act, 42 U.S.C. § 6928(a) )

EPA Docket No. RCRA-10-2009-0206

**COMPLAINT,  
COMPLIANCE ORDER,  
AND NOTICE OF OPPORTUNITY  
FOR HEARING**

**I. INTRODUCTION**

1. This Complaint, Compliance Order, and Notice of Opportunity for Hearing ("Order") is issued pursuant to Section 3008(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6928(a), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination, or Suspension of Permits, 40 C.F.R. Part 22.

Respondents, W and E International Trading Company ("W and E"), Mr. Ziliang Zhu ("Ziliang

Zhu”), and SM Metals, L.L.C. (“SM Metals”) are hereby notified that the United States Environmental Protection Agency (“EPA”) alleges that Respondents violated Sections 3002 and 3017 of RCRA, 42 U.S.C. §§ 6922 and 6938, the regulations implementing RCRA at 40 C.F.R. Parts 261 and 262, and the EPA-authorized Washington dangerous waste management regulations set forth in the Washington Administrative Code (WAC) 173-303 *et seq.* by failing to properly manage hazardous wastes. This Order also provides notice of compliance measures that must be undertaken by Respondents to address these violations as well as Respondents’ opportunity to request a hearing.

## **II. NATURE OF ACTION**

2. This is an action commenced pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), ordering Respondents to come into compliance with Sections 3002 and 3017 of RCRA, 42 U.S.C. §§ 6922 and 6938, the regulations implementing RCRA at 40 C.F.R. Parts 261 and 262, and the EPA-authorized Washington dangerous waste management regulations set forth in the Washington Administrative Code (WAC) 173-303 *et seq.*

3. Notice of commencement of this action has been given to the State of Washington (“Washington”) pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

## **III. STATUTORY AND REGULATORY FRAMEWORK**

4. In 1976, Congress enacted RCRA, amending the Solid Waste Disposal Act, to regulate hazardous waste management. The Hazardous Waste and Solid Waste Amendments of 1984 (HSWA) provides additional authority under RCRA to regulate hazardous wastes. Under Subtitle C of RCRA, RCRA Section 3001 *et seq.*, 42 U.S.C. § 6921 *et seq.*, EPA has the authority to identify and list hazardous wastes. RCRA Subtitle C also authorizes EPA to

regulate hazardous waste generators, transporters, exporters, and the owners and operators of hazardous waste treatment, storage, and disposal facilities. EPA has promulgated federal regulations to implement RCRA Subtitle C, which are set forth at 40 C.F.R. Parts 260-270, 273, and 279.

5. Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), authorizes the EPA Administrator to issue orders requiring compliance immediately or within a specified time for violation of any requirement of Subtitle C of RCRA, RCRA Section 3001 *et seq.*, 42 U.S.C. § 6921 *et seq.*

6. The Administrator has delegated the authority to issue compliance orders in Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), to the Director of the Office of Compliance and Enforcement, EPA Region 10.

7. Pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, EPA may authorize a state to administer its hazardous waste program in lieu of the federal program when EPA deems the state program to be equivalent to the federal program.

8. Washington initially received final authorization on January 30, 1986, effective January 31, 1986 (51 FR 3782), to implement the State's dangerous waste management program. EPA granted authorization for changes to Washington's program on September 22, 1987, effective on November 23, 1987 (52 FR 35556); August 17, 1990, effective October 16, 1990 (55 FR 33695); November 4, 1994, effective November 4, 1994 (59 FR 55322); February 29, 1996, effective April 29, 1996 (61 FR 7736); September 22, 1998, effective October 22, 1998 (63 FR 50531); October 12, 1999, effective January 11, 2000 (64 FR 55142); April 11,

2002, effective April 11, 2002 (67 FR 17636); April 14, 2006, effective June 13, 2006 (71 FR 19442); and October 30, 2006, effective December 29, 2006 (71 FR 63253).

9. States, including Washington, are not authorized to implement the RCRA hazardous waste export requirements found at 40 C.F.R. Part 262, Subparts E and H because of the federal government's special role in foreign policy matters. Specifically, EPA has retained the authority to transmit export information to foreign countries through the Department of State and to transmit Acknowledgement of Consent to the exporter. However, Washington has incorporated 40 C.F.R. Part 262, Subparts E and H by reference into its regulations found at WAC 173-303-230(1) and requires that copies of any forms or reports submitted to EPA as required by 40 C.F.R. Part 262, Subpart E also be submitted to the Washington Department of Ecology (the "Department").

10. Regulations promulgated pursuant to HSWA authority take effect in authorized states at the same time that they take effect in unauthorized states. EPA carries out HSWA requirements and prohibitions in authorized states until EPA authorizes the state to do so.

11. The conditional exclusion from the definition of solid waste for cathode ray tubes ("CRTs") exported in accordance with the requirements of 40 C.F.R. § 261.40 was promulgated pursuant to HSWA authority. Washington is not currently authorized for the CRT conditional exclusion found in 40 C.F.R. § 261.40.

12. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), if EPA determines that a person has violated any requirement of Subtitle C of RCRA, Sections 3001-3023e of RCRA, 42 U.S.C. §§ 6921-6939e, EPA may issue an order to require compliance immediately or within a specified time.

13. Section 3006 of RCRA, 42 U.S.C. § 6926, provides that authorized state hazardous waste programs are carried out under Subtitle C of RCRA. Therefore, a violation of any requirement of an authorized state hazardous waste program is a violation of a requirement of Subtitle C of RCRA.

14. Pursuant to Section 3001 of RCRA, 42 U.S.C. § 6921, EPA promulgated regulations to define what materials are "solid wastes," and of these solid wastes, what wastes are "hazardous wastes." These regulations are set forth in 40 C.F.R. Part 261.

15. Pursuant to 40 C.F.R. § 261.2, a "solid waste" is any discarded material that is not otherwise excluded by regulation.

16. Pursuant to 40 C.F.R. §§ 261.4(a)(22)(ii) and 261.40, used, intact CRTs exported for recycling are solid wastes if they are speculatively accumulated or the exporter fails to notify EPA of an intended export sixty (60) days before the CRTs are scheduled to leave the United States, or the exporter fails to obtain an "Acknowledgement of Consent" from the receiving country, which must accompany the shipment. Persons who export used, intact CRTs for reuse pursuant to the conditional exclusion from the definition of solid waste must send a one-time notification to EPA documenting the person's intent to export used, intact CRTs for reuse, and must retain normal business records associated with these activities demonstrating that each shipment will be reused for at least three years from the date of export, pursuant to 40 C.F.R. § 261.41.

17. Section 3002 of RCRA, 42 U.S.C. § 6922, requires EPA to establish standards applicable to generators of hazardous wastes. These standards are codified at 40 C.F.R. Part 262 and include requirements such as determining whether a waste is hazardous, managing

waste in proper containers, labeling and dating containers, inspecting waste storage areas, training, and planning for emergencies. Washington has adopted comparable requirements that are part of its authorized hazardous waste management program and codified at WAC 173-303. The Washington Administrative Code regulates “dangerous wastes.” For purposes of this Order, the terms “dangerous waste” and “hazardous waste” shall be interchangeable.

18. Section 3017 of RCRA, 42 U.S.C. § 6938, authorizes EPA to promulgate regulations necessary to prevent the unauthorized export of hazardous waste. Such regulations are set forth in 40 C.F.R. §§ 262.50-58; 262.80-89. 40 C.F.R. § 262.52 prohibits exports of hazardous waste without: (a) notification to EPA of intent to export as required under 40 C.F.R. § 262.53; (b) consent of the receiving country; (c) a copy of the EPA “Acknowledgment of Consent” to the shipment attached to the manifest (or shipping paper for exports by water [bulk shipment]); and (d) the shipment conforming with the terms of the receiving country’s consent.

#### **IV. GENERAL AND FACTUAL ALLEGATIONS**

19. Respondent W and E International Trading (“W and E”) is a “person,” as that term is defined by Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and WAC 303-173-040, doing business in the state of Washington.

20. Respondent W and E sometimes identifies itself as “WANDE International Trading.”

21. Respondent W and E has specified its business address as 1534 Summerfield Drive, Allen, Texas 75002.

22. Respondent W and E is not incorporated or registered to do business in Washington, Oregon, or Texas.

23. Respondent Ziliang Zhu is a natural person, and a "person," as that term is defined by Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and WAC 303-173-040, doing business in the state of Washington.

24. Respondent Ziliang Zhu also represents himself as and conducts business under the name of "Eric Zhu."

25. Respondent Ziliang Zhu personally conducts business activities and holds himself out as a representative and owner of "W and E International Trading."

26. Respondent W and E and Respondent Zhu are engaged in the business of arranging for the export of used electronic equipment and parts, including color computer monitors. These computer monitors contain CRTs.

27. On April 24, 2009, W and E exported shipping container number MSKU4651881 (also identified as ITN# X20090420025282) (hereinafter referred to as the "Container") from the Port of Tacoma, Washington, to Hong Kong, China. The content of the shipment was described by W and E as "plastic scrap."

28. The Container contained approximately 539 used color computer monitors of assorted makes and models, some of which had broken plastic casings and/or severed power cords. The container also included three pallets of discarded used computer central processing units, five boxes of used computer keyboards, and one used lead acid battery.

29. On May 31, 2009, the Hong Kong Environmental Protection Department notified EPA that the Hong Kong government had intercepted the Container at the Port of Hong Kong and had returned it to the original port of dispatch (i.e., the Port of Tacoma).

30. The CRTs included in the Container are solid wastes because Respondents did not notify EPA of their intent to export used intact CRTs sixty (60) days prior to the export, and Respondents did not receive consent from Hong Kong to receive the container, as required by the conditional exclusion at 40 C.F.R. § 261.39(a)(5).

31. The CRTs shipped by Respondents constitute "hazardous waste" as defined in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), and 40 C.F.R. §§ 260.10 and 261.3, and "dangerous wastes" as defined in WAC 173-303-040. Color computer monitors contain an average of four pounds of lead and studies show that CRTs leach lead at levels considerably above the toxicity characteristic regulatory level used to classify lead-containing wastes as hazardous (40 C.F.R. § 261.24(b)). In addition, CRTs often contain mercury, cadmium, and arsenic.

32. WAC 173-303-040 defines the term "generator" as any person, by site, whose act or process produces dangerous waste or whose act first causes a dangerous waste to become subject to regulation.

33. 40 C.F.R. §262.51 defines the term "primary exporter" as any person who is required to originate the manifest for a shipment of hazardous waste in accordance with 40 C.F.R. Part 262, Subpart B, or equivalent state provision, which specifies a treatment, storage, or disposal facility in a receiving country as the facility to which the hazardous waste will be sent, and any intermediary arranging for the export.



34. Respondent W and E is a “generator” as that term is defined by WAC 173-303-040.

35. Respondent W and E is a “primary exporter” as that term is defined in 40 C.F.R. § 262.51.

36. Respondent Ziliang Zhu is a “generator” as that term is defined by WAC 173-303-040.

37. Respondent Ziliang Zhu is a “primary exporter” as that term is defined in 40 C.F.R. § 262.51.

38. Respondent SM Metals is incorporated in the state of Washington, with its principal place of business located at 2608 104th Street Court South, #J2, Lakewood, Washington 98499.

39. Respondent SM Metals is a “person,” as that term is defined by Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), and WAC 303-173-040, doing business in the state of Washington.

40. Prior to their export, the CRTs in the Container had been collected and prepared for shipment and disposal by Respondent SM Metals at the SM Metals facility in Lakewood, Washington.

41. Respondent SM Metals generated CRT wastes and other electronic wastes when it collected them and prepared them for export and disposal in Hong Kong.

42. Respondent SM Metals is a “generator” as that term is defined by WAC 173-303-040.

43. Respondent SM Metals is a “primary exporter” as that term is defined in 40 C.F.R. § 262.51.

## V. VIOLATIONS

### COUNT 1: Failure to Make a Dangerous Waste Determination

44. WAC 173-303-70 requires a person who generates a solid waste to determine if that solid waste is a dangerous waste or an extremely hazardous waste.

45. Respondents failed to make a determination whether the CRTs and other solid wastes included in the Container were dangerous or extremely hazardous wastes in accordance with the requirements of WAC 173-303-70.

46. Respondents’ failure to make this determination is a violation of WAC 173-303-70.

### COUNT 2: Failure to obtain an EPA RCRA Identification Number and Notify the Washington Department of Ecology of Dangerous Waste Activities

47. WAC 173-303-60(1) requires any person who generates, transports, offers for transport, or transfers a dangerous waste to have a current EPA/state RCRA identification number that identifies the location and nature of the activities.

48. WAC 173-303-60(2) requires every person who must have an EPA/state RCRA identification number to notify the Department of the nature of its dangerous waste activities by submitting a completed Washington State Dangerous Waste Site Identification Form to the Department.

49. Respondents did not, at any time relevant to this Order, obtain an EPA/state RCRA Identification Number.

50. Respondents did not, at any time relevant to this Order, notify the Department of its activities that require them to obtain and complete a Washington State Dangerous Waste Site Identification Form.

51. Respondents' failure to obtain an EPA/state RCRA Identification Number and to notify the Department of its dangerous waste activities is a violation of WAC 173-303-60(1) and (2).

**COUNT 3: Failure to Prepare a Hazardous Waste Manifest**

52. WAC 173-303-180 requires any generator who transports or offers for transport a dangerous waste to prepare a manifest and follow the procedures specified in that section.

53. Respondents transported and offered for transport the dangerous waste in the Container without preparing a manifest to accompany the shipment.

54. Respondents' failure to prepare a manifest for the dangerous wastes in the Container is a violation of WAC 173-303-180.

**COUNT 4: Failure to Properly Package a Dangerous Waste for Transport**

55. WAC 173-303-190(1) requires any generator, before transporting or offering for offsite transport, any dangerous waste to package the waste in accordance with the requirements of the Department of Transportation ("DOT") regulations on packaging at 49 C.F.R. Parts 173, 178, and 179.

56. Respondents offered for transport and/or transported dangerous wastes in the Container without packaging those wastes in conformity with 49 C.F.R. Parts 173, 178, and 179.

57. Respondents' failure to properly package the wastes included in the Container in accordance with the above-referenced DOT regulations is a violation of WAC 173-303-190(1).

**COUNT 5: Failure to Properly Label and Mark Dangerous Waste**

58. WAC 173-303-190(2) and (3) requires any generator who transports or offers for transport a dangerous waste to label and mark each package containing the waste in accordance with the DOT regulations found in 49 C.F.R. Part 172.

59. The Respondents offered for transport and/or transported dangerous wastes in the Container without labeling or marking those wastes in conformity with 49 C.F.R. Parts 173.

60. Respondents' failure to mark each package of hazardous waste in accordance with the above-mentioned DOT regulations is a violation of WAC 173-303-190(2) and (3).

**COUNT 6: Failure to Notify EPA of Intent to Export a Hazardous Waste**

61. 40 C.F.R. § 262.53(a) requires a primary exporter of a hazardous waste to notify EPA of an intended export before such waste is scheduled to leave the United States, at least sixty (60) days before an initial shipment is intended to be shipped off site. The content and procedures for providing this notice are specified in 40 C.F.R. § 262.53(b). Following this notification EPA, in conjunction with the U.S. Department of State, contacts the intended receiving and transit countries to verify their Acknowledgement of Consent to receive the hazardous waste, and communicates this consent or lack thereof to the primary exporter.

62. Respondents failed to notify EPA of their intent to export the hazardous waste in the Container prior to their export to Hong Kong on April 24, 2009.

63. Respondents' failure to provide notice to EPA of their intention to export a hazardous waste at least 60 days prior to the export, in accordance with the procedures established in 40 C.F.R. § 262.53(a) and (b), is a violation of 40 C.F.R. § 262.53.

**COUNT 7: Illegal Export of Hazardous Waste**

64. 40 C.F.R. § 262.52 prohibits exports of hazardous waste from the United States except in accordance with the requirements of 40 C.F.R. Part 262, Subpart E, and Part 263. Exports of hazardous waste are prohibited unless: (1) notification of intent to export has been provided in accordance with 40 C.F.R. § 262.53; (2) the receiving country has consented to accept the hazardous waste; (3) a copy of the Acknowledgement of Consent to the shipment accompanies the hazardous waste shipment and, unless exported by rail, is attached to the manifest (or shipping paper for exports by water (bulk shipment)); and (4) the hazardous waste shipment conforms to the terms of the receiving country's written consent as reflected in the Acknowledgment of Consent.

65. Respondents' shipment of hazardous waste in the Container was exported from the Port of Tacoma, Washington, to Hong Kong on April 24, 2009, without a primary exporter providing prior notice to EPA of its intent to export the waste.

66. Hong Kong did not consent to receive the hazardous waste in the Container or issue an Acknowledgement of Consent to receive the waste in the Container.

67. An Acknowledgement of Consent did not accompany the shipment of the Container to Hong Kong.

68. The hazardous waste in the Container did not conform to the terms of an Acknowledgement of Consent.

69. Respondents' activities related to the export of the Container did not comply with the requirements of 40 C.F.R. § 262.52(a)-(d). Therefore, Respondents illegally exported hazardous waste in violation of 40 C.F.R. § 262.52.

#### **VI. COMPLIANCE ORDER**

70. Based on the foregoing findings, Respondents are hereby ordered to achieve and maintain compliance with the requirements of WAC 173-303, 40 C.F.R. Part 262, Subpart E, and any other applicable requirements. Specifically:

- a. Within ten (10) days of the effective date of a Final Order, Respondents shall submit to EPA a detailed inventory of each of the items currently in the Container and shall make a dangerous waste determination regarding those items in accordance with the procedures in WAC 173-303-070(3).
- b. Within twenty (20) days of the effective date of a Final Order, Respondents shall submit for EPA approval a Compliance Plan detailing how the Respondents intend to manage each item in the Container (*i.e.*, for reuse, recycle, or discard) in accordance with the WAC and 40 C.F.R. Parts 261-265, and any other applicable state or federal laws and implementing regulations. The Compliance Plan shall include a schedule and requirement to submit documentation to EPA demonstrating timely performance of each element of the Compliance Plan.
- c. Respondents shall not remove or transport any items from the Container without prior written approval from EPA.
- d. Respondents shall properly dispose of the contents of the Container no later than sixty (60) days from the effective date of a Final Order. Within five (5) days of

completion of all elements of the EPA-approved Compliance Plan, Respondents shall submit to EPA a Completion Report which details the actual disposition of each item listed on the Container inventory required pursuant to paragraph 70(a) of this Order, provides copies of supporting documentation demonstrating full completion of the activities described in the Compliance Plan, and details the total cost of Respondents' actions to implement the Compliance Plan.

71. The information requested in this Order is not subject to the Paperwork

Reduction Act of 1980, 44 U.S.C. § 3501 *et seq.*

72. Respondent shall submit any information, reports, and/or notices required by this Order or the Compliance Plan to:

Xiangyu Chu, Compliance Officer  
U.S. Environmental Protection Agency Region 10  
Office of Compliance and Enforcement  
1200 Sixth Avenue, Suite 900  
Mail Stop: OCE-127  
Seattle, Washington 98101

73. If Respondents fail to comply with the requirements of this Order within the time specified, Section 3008(c) of RCRA, 42 U.S.C. § 6928(c), provides for further enforcement action in which EPA may seek the imposition of penalties of up to \$37,500 for each day of continued noncompliance, in addition to any other penalties that may be assessed for past or ongoing violations.

74. In accordance with 40 C.F.R. § 22.37(b), this Order shall automatically become a Final Order unless, no later than thirty (30) days after this Complaint and Compliance Order is served, Respondent requests a hearing pursuant to 40 C.F.R. § 22.15.

## **VII. ASSESSMENT OF PENALTIES**

75. EPA reserves its right to assess penalties and/or seek additional appropriate injunctive relief for violations of the requirements cited in Section V of this Order, as provided by Section 3008 of RCRA, 42 U.S.C. § 6928.

## **VII. OPPORTUNITY TO REQUEST A HEARING AND FILE ANSWER**

76. Under Section 3008(b) of RCRA, 42 U.S.C. § 6928(b), and 40 C.F.R. § 22.15, Respondents have a right to request a hearing on the issues raised in this Order. Any such hearing would be conducted in accordance with 40 C.F.R. Part 22. **A request for a hearing must be incorporated in a written answer filed with the Hearing Clerk within thirty (30) days of service of this Order. In their answer(s), Respondents may contest any material fact contained in the Order.** The answer shall directly admit, deny, or explain each of the factual allegations contained in the Order and shall state: (1) the circumstances or arguments alleged to constitute the grounds of defense; (2) the facts that Respondents intend to place at issue; and (3) whether a hearing is requested. Where Respondents have no knowledge as to a particular factual allegation and so state, the allegation is deemed denied. Any failure of Respondents to admit, deny, or explain any material fact contained in the Order will constitute an admission of that allegation.

Respondents' answer(s) should be sent to:

Carol Kennedy, Regional Hearing Clerk  
EPA Region 10  
1200 Sixth Ave., Suite 900  
Mail Stop: ORC-158  
Seattle, WA 98101  
Tel: 206-553-0242

77. Pursuant to 40 C.F.R. §22.37(b) this Compliance Order shall



automatically become a final order unless, no later than thirty (30) days after the Order is served, the Respondent requests a hearing pursuant to 40 C.F.R. § 22.15.

FOR COMPLAINANT U.S. ENVIRONMENTAL PROTECTION AGENCY:

  
\_\_\_\_\_  
Edward J. Kowalski, Director  
Office of Compliance and Enforcement  
EPA Region 10

Dated: 7/14/09

PARTY DESIGNATED TO RECEIVE SERVICE ON BEHALF OF THE COMPLAINANT:

Shirin Venus, Assistant Regional Counsel  
EPA Region 10  
1200 Sixth Ave., Suite 900  
Mail Stop: ORC-158  
Seattle, WA 98101  
Tel: 206-553-4194

## CERTIFICATE OF SERVICE

I hereby certify that the original and one true and correct copy of the foregoing Complaint and Compliance Order, **Docket No. RCRA-10-2009-0206** were hand-delivered to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 10, 1200 Sixth Avenue, Seattle, Washington 98101, on this 14<sup>th</sup> of July 2009.

**DATED** this 14 day of July 2009

Lisa Bingham

Lisa Bingham

U.S. Environmental Protection Agency

Region 10

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