



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

June 18, 2013

VIA EMAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Terry Cao  
President  
Taotao USA, Inc.  
Suite 100  
2425 Camp Avenue  
Carrollton, Texas 75006

Re: *In the matter of Taotao USA, Inc.*  
AED/MSEB No. 7872

Dear Mr. Cao:

We have continuing concerns with Taotao USA, Inc.'s ability to honor its obligations under the Vehicle and Engine Compliance Plan (VECP), Attachment C to the Administrative Settlement Agreement (ASA) between the U.S. Environmental Protection Agency (EPA) and Taotao USA, Inc. (Taotao), effective June 28, 2010. While we recognize Taotao has made steps in the right direction by working with a consultant to improve Taotao's certification and testing practices and comply with its obligations under the ASA and VECP, it is clear more attention needs to be paid to these matters. We also note that Taotao's 2013 VECP annual progress report is due to EPA by June 28, 2013.

We have the following comments and requests regarding Taotao's 2012 VECP annual progress report submitted to EPA on January 23, 2013.

Pre-Importation Vehicle Inspection Worksheets

The reporting requirements of the VECP are set forth in Paragraph 22 of the VECP. As you know, Taotao has provided only a few of the documents that Taotao is required to provide to the EPA under the ASA. Pre-importation vehicle inspection worksheets are required by Paragraph 9 of the VECP, which states that "Taotao must confirm that all Subject Vehicles and Engines must be certified, properly labeled, and meet applicable emissions standards, including the identification, as required, of Emissions Related Parts in the Certificate of Conformity application and in any applicable EPA-approved Running Changes. Where Taotao is not the Certificate holder, Taotao must obtain and review, prior to importation of any Subject Vehicles and Engines to the United States, copies of all Certificates of

Conformity for each Engine Family, all Certificate of Conformity applications, and all Running Change applications relating to the Subject Vehicles and Engines.”

Pre-importation vehicle inspection worksheets are also required under Paragraph 22(b) of the VECP, specifying that Taotao’s annual progress report must contain the “results of all inspections and emission or catalyst tests performed by Taotao under Sections II and III of the VECP, with the corresponding test plan.” However, Taotao has failed to submit numerous pre-importation vehicle inspection worksheets. The following are the engine families for which Taotao did not include the required pre-importation vehicle inspection worksheets: BTAOX0.12A1T; BTAOX.230AAB; BTAOX.250AAB; BTAOX.124AAA; BTAOX0.15G2T; BTAOC.049MC1; CTAOX.250AAB; and CTAOX.124AAA. In addition, EPA has not received a copy of the owners manual for Taotao’s 50cc highway motorcycle.

### Catalyst Test Reports

Catalyst testing is required by Paragraph 12 of the VECP, and Paragraph 22(b) of the VECP specifies that your annual progress report must include “the results of all inspections and emission or catalyst tests performed by Taotao...with the corresponding test plan”. In addition, under Paragraph 38 of the ASA and Paragraph 18 of the VECP, Taotao is required to provide test reports to the EPA upon request.

On August 9, 2012, EPA agreed to allow Taotao to test catalyst samples from vehicles from three engine families that had already been imported (CTAOX0.12A1T, CTAOX.230AAB, and CTAOC.049MC1). However, Taotao failed to provide the EPA with pre-importation catalyst test reports for other engine families. Thus, the EPA is requesting catalyst test reports for the following engine families: BTAOX0.12A1T; BTAOX.230AAB; BTAOX.250AAB; BTAOX.124AAA; BTAOX0.15G2T; BTAOC.049MC1; CTAOX.250AAB; CTAOC.150MC1 and CTAOX.124AAA. The EPA requires these test results to verify whether the catalysts met design specifications. In addition, the EPA requires the test plan(s) for all pre-importation catalyst testing.

### Post-Importation Vehicle Inspection Worksheets

Taotao is also required to submit all post-importation vehicle inspection worksheets under Paragraphs 14-16 of the VECP. According to Paragraph 15 of the VECP, “Taotao must, for each Test Lot: inspect at least three Samples and verify that the Samples meet applicable regulatory requirements, using the Checklist; and verify that the Subject Vehicles and Engine's Emissions Related Parts are consistent with the certification application by disassembling one of the Samples, to the extent necessary to verify the Emissions Related Parts. If the Vehicle or Engine Model includes a catalyst, this inspection must include the inspection of one catalyst to verify its part number, dimensions, and cell density.” The EPA should have received worksheets for three samples for each model based on semi-annual inspections. However, the EPA has received no post-importation vehicle inspection worksheets from Taotao.

### Staff Training Program

Taotao is required to implement a staff training program under Paragraphs 20 and 21 of the VECP by providing appropriate initial and annual refresher training to all staff implementing the VECP. Paragraph 21 explains that “each employee of Taotao implementing this Compliance Plan must certify that he or she has participated in the training, received a copy of the Compliance Plan, been informed of the Compliance Hotline, and understands that violations of the applicable regulations can result in the imposition of significant civil penalties to Taotao.” The EPA has received only one certification for the

year 2012. Thus, the EPA is requesting all information pertaining to the number of Taotao staff members who were working to implement the VECP from June 2011 to June 2012.

The EPA has tried to help Taotao meet its obligations under the ASA. Not only did the EPA allow Taotao to fulfill some of its pre-importation catalyst testing requirements under the ASA by testing samples from vehicles from three engine families that had already been imported, but the EPA also directly worked with Taotao's consultant, Ms. Margaret Goldstein, to help Taotao comply with the ASA. Further, the EPA extended Taotao's deadline on its 2012 annual report numerous times. Taotao's annual report was originally due on June 28, 2012, and the EPA extended this deadline, upon request by Taotao, once to September 1, 2012, and then again to December 1 and 21, 2012. The EPA did not receive Taotao's annual report until January 23, 2013. If the EPA had not extended Taotao's original June 28, 2012 reporting deadline, Taotao would have been liable for stipulated penalties of about \$225,000, under Paragraph 29(b) of the ASA.

It is important that Taotao meet its obligations—as it agreed to do when it executed the ASA—to avoid future investigation and possible enforcement action, or the imposition of stipulated penalties, related to the importation of its products into the U.S. Please send me the complete pre- and post-importation vehicle inspection worksheets and catalyst test reports (and corresponding test plans) and contact me to schedule a call to discuss the above issues no later than 10 business days from the date of this letter. My phone number is 303-312-7156, and my email address is [Thompson.Christopher@epa.gov](mailto:Thompson.Christopher@epa.gov).

To emphasize how seriously EPA regards recordkeeping and reporting issues, please review the attached Enforcement Alert, published May 2013, which is intended to help those involved with certifying, assembling, importing, distributing, and servicing highway motorcycles and nonroad vehicles and engines understand their recordkeeping and reporting requirements under Title II of the Clean Air Act.

EPA reserves all rights under the ASA. Nothing in this letter limits EPA's right to proceed against Taotao in the event of default or noncompliance with the ASA, the Subject Vehicle Corrective Action Plan, or the VECP, for violations of §§ 203 or 213 of the Act, 42 U.S.C. §§ 7522 or 7547, 40 C.F.R. Parts 86, 1051, 1060, and 1068, for other violations of law, or with respect to other matters not within the scope of this letter.

Sincerely,



Christopher A. Thompson

cc: Robert Klepp, Acting Mobile Source Enforcement Branch Chief, U.S. EPA  
Anne Wick, Vehicle and Engine Team Leader, U.S. EPA  
Jackie Wang, Taotao USA, Inc.  
Margaret Goldstein, Harrison Wolf Consulting Inc.

Enc: May 2013 Vehicles and Engines Recordkeeping and Reporting Requirements Enforcement Alert

**Isin, Amelie**

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**From:** Jackie Wang <jackie@taotao.us>  
**Sent:** Tuesday, June 25, 2013 5:43 PM  
**To:** Thompson, Christopher; Isin, Amelie; margaret (Harrison Wolf); matao cao  
**Subject:** Written response from TAOTAO

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Chris,

As the leading Chinese ATV/Scooter distributor, we are trying to be a role model in this industry. We understand the importance of catalyst testing in the whole compliance process. Thanks to Harrison Wolf's help, we've been using SGS Canada as our catalyst testing lab since last year. According to your June 18th's letter, we still need to have the following engine families tested: BTAOX.12A1T; BTAOX.230AAB; BTAOX.250AAB; BTAOX.124AAA; BTAOX.15G2T; BTAOC.049MC1; CTAOX.250AAB; CTAOC.150MC1 and CTAOX.124AAA. The reason that we only had CTAOX.12A1T, CTAOX.230AAB and CTAOC.049MC1 tested last year by SGS Canada is that's the models we had in stock then and SGS doesn't have enough time to finish more testing models according to our schedule.

Vehicles from the model year 2011 engine are no longer available. But, we still have some vehicles from engine family CTAOC.150MC1 in stock. May we suggest to have Harrison Wolf come to our warehouse and randomly pick the models from our current inventory and then have SGS to test? We will then begin testing catalysts from our model year 2013 engine families, and will also develop a schedule to perform the required pre-importation testing. We plan to continue to have all testing performed by SGS in Canada, as we have not been able to find an EPA recognized lab in China.

All the pre-importation vehicle inspection worksheets we submitted for the 2012 annual report have detail photos from our manufacturer. But they don't have the photos of the 2011 year models. We will re-submit the worksheets for CTAOX.250AAB and CTAOX.124AAA to EPA before next Monday.

The post-importation vehicle inspection worksheets will be included in the new annual report. And also the staff training certification. We now have five employees working on the EPA related work, four in TX, one in L.A..

The compliance letter which signed by Terry in 2010 has been a good guide for us, but we humbly request some changes to it. We will provide more information to EPA about it.

We admit there still are a lot of things we need to improve in our compliance process. EPA will see more progress that we make this year. We are looking forward to getting more guidance from EPA for our future new product line, like the snowmobile.

Thank you again for everything.

**Jackie Wang**

**TAOTAO USA INC. (L.A. Branch)**

**Add: 14275 Telephone Ave, Unit A, Chino, CA 91710**

**Site: [www.taotao.us](http://www.taotao.us)**

**Office: 909-614-1661**

**Fax: 909-614-1501**

**Cell: 909-859-4193 (24/7 available for our dealers)**

## Isin, Amelie

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**From:** Thompson, Christopher  
**Sent:** Monday, June 24, 2013 12:07 PM  
**To:** Jackie Wang; Isin, Amelie; margaret (Harrison Wolf); matao cao  
**Cc:** Wick, Anne  
**Subject:** RE: Hi Chris

Jackie. We appreciate your offer to meet. However, before we do so, Taotao needs to submit a written response to the 6/18/2013 EPA letter. In addition, the most important thing is for Taotao to submit its complete 2013 report by 6/28/2013 as required by the ASA. We will evaluate these two submissions and then contact you regarding a meeting. Thank you, Chris

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Christopher A. Thompson  
Chief - Western Field Office  
Air Enforcement Division (8MSU)  
U.S. EPA Office of Civil Enforcement  
1595 Wynkoop Street  
Denver, Colorado 80202  
t (303) 312-7156

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**From:** Jackie Wang [mailto:jackie@taotao.us]  
**Sent:** Saturday, June 22, 2013 7:26 PM  
**To:** Thompson, Christopher; Isin, Amelie; margaret (Harrison Wolf); matao cao  
**Subject:** Hi Chris

Hi Chris,

We got your email on Thursday. First I want to say thank you to you and Amelie. We couldn't make a lot of improvements in 2012 without your help and recommendation of Harrison Wolf. We will spend more money on EPA-related self-testing and other important tasks this year. We do need your guide in this process.

I hate to waste your time. And I know talk is cheap. We are company that walk the walk. That's why when Terry got your email he called me within 3 hours and told me to fly to D.C. or Denver to meet you.

May I meet you early next week to discuss the ASA and other compliance plan?

Thank you for your time, Sir.

**Jackie Wang**

**TAOTAO USA INC. (L.A. Branch)**

**Add: 14275 Telephone Ave, Unit A, Chino, CA 91710**

**Site: [www.taotao.us](http://www.taotao.us)**

**Office: 909-614-1661**

**Fax: 909-614-1501**

**Cell: 909-859-4193 (24/7 available for our dealers)**

## Isin, Amelie

---

**From:** Thompson, Christopher  
**Sent:** Wednesday, June 19, 2013 6:33 PM  
**To:** taotaoreport@gmail.com; yktaotao@gmail.com  
**Cc:** jackie@taotao.us; margaret@harrisonwolf.com; Klepp, Robert; Wick, Anne; Isin, Amelie  
**Subject:** Taotao - Compliance with Administrative Settlement Agreement  
**Attachments:** [Untitled].pdf; vehicleengine final.pdf

Terry & Jackie: please see the attached letter regarding Taotao's implementation of the requirements of the Administrative Settlement Agreement between Taotao and EPA. As requested in the letter, please contact me to set up a call to discuss these matters. Thank you,

---

Christopher A. Thompson  
Chief - Western Field Office  
Air Enforcement Division (8MSU)  
U.S. EPA Office of Civil Enforcement  
1595 Wynkoop Street  
Denver, Colorado 80202  
t (303) 312-7156



# **TAOTAO USA, INC.**

## **ANNUAL PROGRESS REPORT**

### **IMPLEMENTATION OF COMPLIANCE PLAN**

ASA: AED/MSEB #7872

**REPORTING PERIOD:  
JUNE 1, 2012 TO JUNE 30, 2013**

Submitted to:

U.S. Environmental Protection Agency  
Mail Code 2242A  
1200 Pennsylvania Ave., NW  
Washington, DC 20460  
Attn: AED/MSEB # 7872

TAOTAO USA, Inc., 2425 Camp Avenue, Suite 100, Carrollton, TX 75006



TAOTAO USA INC  
Add: 2425 Camp. Ave., Suite 100, Carrollton, TX 75006  
Ph: 214-635-3980  
Fax: 214-635-3985

June 28, 2013

Amelie Isin, P.E.  
U.S. Environmental Protection Agency  
Mail Code 2242A  
1200 Pennsylvania Ave., NW  
Washington, DC 20460  
U.S.A.  
Attn: AED/MSEB # 7872

Re: Catalyst Test Report

Dear Ms. Isin:

In accordance with the agreement between the United States Environmental Protection Agency (EPA) and Taotao USA, Inc., we provide the following report:

Report B, Part 1):

Results of catalyst tests performed under Sections II and III of the Compliance Plan, including corresponding test plan, with comparison to catalyst descriptions in COC applications and Professional Engineer review and declaration (as described in ASA: AED/MSEB #7872, Attachment C, Section II.12 and Section V.b)

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that this document and its attachments were prepared either by me personally or under my direction or supervision in a manner designed to ensure that qualified and knowledgeable personnel properly gather and present the information contained therein. I further certify, based on my personal knowledge or on my inquiry of those individuals immediately responsible for obtaining the information, that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowingly and willfully submitting a materially false statement.

Respectfully,

Matao Cao, President  
Taotao USA, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 1, 2013

VIA EMAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Terry Cao  
President  
Taotao USA, Inc.  
Suite 100  
2425 Camp Avenue  
Carrollton, Texas 75006

Re: *In the matter of Taotao USA, Inc.*  
AED/MSEB No. 7872

Dear Mr. Cao:

We have serious continuing concerns with Taotao USA, Inc.'s ability to honor its obligations under the Vehicle and Engine Compliance Plan (VECP), Attachment C to the Administrative Settlement Agreement (ASA) between the U.S. Environmental Protection Agency (EPA) and Taotao USA, Inc. (Taotao), effective June 28, 2010. While we recognize Taotao has made steps in the right direction by working with a consultant to improve Taotao's certification and testing practices and comply with its obligations under the ASA and VECP, it is clear significantly more attention needs to be paid to these matters.

We have the following comments and requests regarding Taotao's 2013 VECP annual progress report submitted to the EPA on July 3, 2013. In sum, Taotao has provided only a few of the documents that Taotao is required to provide to the EPA under the ASA.

Subject Vehicles and Engines

The reporting requirements of the VECP are set forth in Paragraph 22 of the VECP. As you know, under in Paragraph 22(a) of the VECP, each annual progress report must include the total number of vehicles and engines (organized by vehicle or engine model and engine family) that have been imported or sold by Taotao during the reporting period (6/1/2012-6/30/2013). Taotao has not provided this information, and therefore the EPA is unable to determine the scope of Taotao's deficiencies related to the remaining inspection and testing requirements of the VECP.

## Pre-Importation Vehicle Inspection Worksheets

Pre-importation vehicle inspection worksheets are required by Paragraph 9 of the VECP, which states that “Taotao must confirm that all Subject Vehicles and Engines must be certified, properly labeled, and meet applicable emissions standards, including the identification, as required, of Emissions Related Parts in the Certificate of Conformity application and in any applicable EPA-approved Running Changes. Where Taotao is not the Certificate holder, Taotao must obtain and review, prior to importation of any Subject Vehicles and Engines to the United States, copies of all Certificates of Conformity for each Engine Family, all Certificate of Conformity applications, and all Running Change applications relating to the Subject Vehicles and Engines.”

Pre-importation vehicle inspection worksheets are also required under Paragraph 22(b) of the VECP, specifying that Taotao’s annual progress report must contain the “results of all inspections and emission or catalyst tests performed by Taotao under Sections II and III of the VECP, with the corresponding test plan.” However, Taotao has failed to submit at least one pre-importation vehicle inspection worksheet for the engine family DTAOX0.15G2T. In addition, the EPA has not received copies of the owners manuals for engine families DTAOX0.15G2T or DTAOC.150MC2.

## Catalyst Test Reports

Catalyst testing is required by Paragraph 12 of the VECP, and Paragraph 22(b) of the VECP specifies that your annual progress report must include “the results of all inspections and emission or catalyst tests performed by Taotao...with the corresponding test plan”. In addition, under Paragraph 38 of the ASA and Paragraph 18 of the VECP, Taotao is required to provide test reports to the EPA upon request.

Taotao failed to provide the EPA with complete pre-importation catalyst test reports for the following engine families: CTAOX.150AAA, CTAOX0.12A1T, DTAOC.049MC2, DTAOC.150MC2, DTAOX0.12A1T, and DTAOX0.15G2T.

A vehicle’s emission control catalyst is essential to the emissions performance of the vehicle. A catalyst installed on a production vehicle must be identical to that catalyst specified in the applicable application for the certificate of conformity to ensure that applicable emissions limitations are attained. Accordingly, the EPA requires these test results to verify whether the catalysts met design specifications. In addition, the EPA requires the test plan(s) for all pre-importation catalyst testing.

## Post-Importation Vehicle Inspection Worksheets

Taotao is also required to submit all post-importation vehicle inspection worksheets under Paragraphs 14-16 of the VECP. According to Paragraph 15 of the VECP, “Taotao must, for each Test Lot: inspect at least three Samples and verify that the Samples meet applicable regulatory requirements, using the Checklist; and verify that the Subject Vehicles and Engine's Emissions Related Parts are consistent with the certification application by disassembling one of the Samples, to the extent necessary to verify the Emissions Related Parts. If the Vehicle or Engine Model includes a catalyst, this inspection must include the inspection of one catalyst to verify its part number, dimensions, and cell density.” The EPA should have received worksheets for three samples for each model based on semi-annual inspections. However, the EPA has received no post-importation vehicle inspection worksheets from Taotao, except for one for engine family: DTAOX0.15G2T.

## Recent Inspection at the Port of Long Beach

On or about June 18, 2013, EPA inspected one of 114 ATVs labeled as belonging to EPA engine family DTAOX0.12A1T imported by Taotao into the port of Long Beach under entry # ES2-02051075. Based on initial analytic screening results, EPA suspects that the catalysts contained in the vehicles belonging to engine family DTAOX0.12A1T have significantly less active material loading compared to the certified design. However, in order to accurately assess the precious metal content of the catalysts, EPA requires additional catalyst samples.

For this reason, the EPA requires that Taotao promptly send two exhaust systems for vehicles from entry # ES2-02051075 via express mail (such as UPS or FedEx) or by registered U.S. Mail to EPA's contractor at the following address: Andrew Loll, Eastern Research Group, 14555 Avion Parkway, Suite 200, Chantilly, VA 20151.

It is important that Taotao meet its obligations—as it agreed to do when it executed the ASA—to avoid future investigation and possible enforcement action, or the imposition of stipulated penalties, related to the importation of its products into the U.S. It has been over three years since Taotao executed the ASA and agreed to implement the VECF. We have repeatedly extended reporting deadlines and made every effort to help Taotao meet its obligations. At this point, however, we can only conclude that Taotao is incapable or unwilling to meet these obligations. As one of the largest importers of recreational vehicles and motorcycles into the U.S., Taotao's repeated failures to meet its legal obligations are inexcusable.

Please send me the total number of vehicles and engines that have been imported or sold by Taotao during the reporting period (6/1/2012-6/30/2013), the complete pre- and post-importation vehicle inspection worksheets and catalyst test reports (and corresponding test plans) by no later than August 14, 2013, and contact me to schedule a call to discuss the above issues. My phone number is 303-312-7156, and my email address is [Thompson.Christopher@epa.gov](mailto:Thompson.Christopher@epa.gov).

The EPA reserves all rights under the ASA. Nothing in this letter limits the EPA's right to proceed against Taotao in the event of default or noncompliance with the ASA, the Subject Vehicle Corrective Action Plan, or the VECF, for violations of §§ 203 or 213 of the Act, 42 U.S.C. §§ 7522 or 7547, 40 C.F.R. Parts 86, 1051, 1060, and 1068, for other violations of law, or with respect to other matters not within the scope of this letter.

Sincerely,



Christopher A. Thompson

cc: Robert Klepp, Acting Mobile Source Enforcement Branch Chief, U.S. EPA  
Anne Wick, Vehicle and Engine Team Leader, U.S. EPA  
Jackie Wang, Taotao USA, Inc.  
Margaret Goldstein, Harrison Wolf Consulting Inc.

**Isin, Amelie**

---

**From:** Margaret <margaret@harrisonwolf.com>  
**Sent:** Thursday, August 15, 2013 7:23 PM  
**To:** Thompson, Christopher  
**Cc:** 'Jackie Wang'; Isin, Amelie  
**Subject:** Taotao USA Inc. - Catalyst Test Plan (AED/MSEB No. 7872)  
**Attachments:** EPA Letter re ASA - Taotao USA (1Aug2013).pdf; Taotao USA, Inc. - Catalyst Test Plan.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Chris,

According to the attached letter to Taotao USA regarding the settlement agreement, Taotao must provide a pre-importation catalyst test plan. I have attached the test plan used in the analysis of Taotao's catalyst samples at SGS Canada Inc. My understanding is that Taotao will continue to use SGS for catalyst testing. If they opt to have future analyses performed at a different test lab, they will update the catalyst plan as needed.

Best regards,

Margaret Goldstein  
Harrison Wolf Consulting  
17611 Metzler Lane  
Huntington Beach, CA 92647  
Tel: (714) 841-6400  
[margaret@harrisonwolf.com](mailto:margaret@harrisonwolf.com)

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**Isin, Amelie**

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**From:** Jackie Wang <jackie@taotao.us>  
**Sent:** Monday, August 05, 2013 3:29 PM  
**To:** Thompson, Christopher  
**Cc:** taotaoreport@gmail.com; yktaotao@gmail.com; margaret@harrisonwolf.com; Klepp, Robert; Isin, Amelie; Wick, Anne  
**Subject:** Re: Taotao - Compliance with Administrative Settlement Agreement

Hi Chris,

Thank you for emailing us the updates of our EPA compliance process.

I am in China right now and will be back next week. Would you please give us a little bit more time for us to get the missing docs ready.

And also, we hired a programmer to develop a new EPA Compliance system. After we have it done, I'll send you the prototype.

Thank you and talk to you soon.

**Jackie Wang**  
**TAOTAO USA INC. (L.A. Branch)**  
**Add: 14275 Telephone Ave, Unit A, Chino, CA 91710**  
**Site: [www.taotao.us](http://www.taotao.us)**  
**Office: 909-614-1661**  
**Fax: 909-614-1501**  
**Cell: 909-859-4193 (24/7 available for our dealers)**

On Thu, Aug 1, 2013 at 5:35 PM, Thompson, Christopher <[Thompson.Christopher@epa.gov](mailto:Thompson.Christopher@epa.gov)> wrote:

Terry & Jackie: Please see the attached letter regarding Taotao's implementation of the requirements of the Administrative Settlement Agreement between Taotao and EPA. Also, as you know, Taotao's final \$12,000 payment is due today. Please provide confirmation of payment. Thank you.

---

Christopher A. Thompson  
Chief - Western Field Office  
Air Enforcement Division (8MSU)  
U.S. EPA Office of Civil Enforcement  
1595 Wynkoop Street  
Denver, Colorado 80202  
t [\(303\) 312-7156](tel:3033127156)



**Isin, Amelie**

---

**From:** Thompson, Christopher  
**Sent:** Thursday, August 01, 2013 8:36 PM  
**To:** taotaoreport@gmail.com; yktaotao@gmail.com  
**Cc:** jackie@taotao.us; margaret@harrisonwolf.com; Klepp, Robert; Isin, Amelie; Wick, Anne  
**Subject:** Taotao - Compliance with Administrative Settlement Agreement  
**Attachments:** [Untitled].pdf

Terry & Jackie: Please see the attached letter regarding Taotao's implementation of the requirements of the Administrative Settlement Agreement between Taotao and EPA. Also, as you know, Taotao's final \$12,000 payment is due today. Please provide confirmation of payment. Thank you.

---

Christopher A. Thompson  
Chief - Western Field Office  
Air Enforcement Division (8MSU)  
U.S. EPA Office of Civil Enforcement  
1595 Wynkoop Street  
Denver, Colorado 80202  
t (303) 312-7156

From: Jackie Wang [mailto:jackie@taotao.us]  
Sent: Monday, August 26, 2013 12:32 PM  
To: Isin, Amelie <Isin.Amelie@epa.gov>; Thompson, Christopher  
<Thompson.Christopher@epa.gov>  
Subject: Vehicle Imported Data – TAOTAO  
Attachments: Vehicles Imported 12.6--13.6(Taotao).xls

Follow Up Flag: Follow up  
Flag Status: Completed

Hi Amelie,

This is the Vehicle Imported Data file which missing from the report.

Thanks.

Jackie Wang  
TAOTAO USA INC. (L.A. Branch)  
Add: 14275 Telephone Ave, Unit A, Chino, CA 91710  
Site: www.taotao.us  
Office: 909-614-1661  
Fax: 909-614-1501  
Cell: 909-859-4193 (24/7 available for our dealers)

**TAOTAO USA, INC.**  
**Total Number of Subject Vehicles Imported**  
**June 1, 2012 to June 1, 2013**

Engine Family Name	Model Name (as listed on CoC)	Quantity Imported by Model	Total Quantity Imported by Engine Family
CTAOX0.12A1T	ATA110-B	6384	13522
	ATA110-D	1938	
	ATA110-A	276	
	ATA125-A	336	
	ATA125-D	3348	
	ATA125-F	1024	
	ATA125-B	216	
CTAOX.150AAA	ATA150-B	540	1254
	ATA150-D	389	
	ATA150-A	325	
CTAOX.230AAB	ATA250-C	0	792
	ATA250-D	792	
CTAOX.250AAB	ATA250C-E	0	0
CTAOX.124AAA	ATD125-C	108	108
	ATD90-A	0	
CTAOX0.15G2T	ATK125-A	504	544
	ATK150-C	40	
CTAOC.150MC1	ATM150-A	1319	5617
	CY150-A	832	
	CY150-C	2381	
	CY150-E	635	
	CY150-D	450	
CTAOC.049MC1	ATM50-A	7033	12859
	CY50-A	2808	
	CY50-B	1439	
	CY50-C	0	
	CY50-E	936	
	CY50-T3	643	
DTAOX0.12A1T	ATA110-B	3768	15552
	ATA110-D	684	
	ATA110-A	0	
	ATA125-A	456	
	ATA125-D	8100	
	ATA125-F	2112	
	ATA125-B	432	
DTAOX.150AAA	ATA150-B	0	1430
	ATA150-D	1170	
	ATA150-A	260	
DTAOX.230AAB	ATA250-C	0	974
	ATA250-D	974	
DTAOX.250AAB	ATA250C-E	126	60
DTAOX.124AAA	ATD125-C	153	661
	ATD90-A	508	
DTAOX0.15G2T	ATK125-A	1008	1128
	ATK150-C	120	
DTAOC.150MC2	EVO 150	801	1509
	PALADIN 150	456	
	POWERMAX 150	312	
	ROMAN 150	0	
	LANCER 150	0	
	BWS 150	252	
DTAOC.049MC2	SPEED 50	12252	23530
	CY50-A	6878	
	VETAS 50	404	
	FUNNY 50	420	
	GT-5	588	
	THUNDER 50	1529	
	VENUS 50	196	
	CY50-T3	1263	

**Total Number of Subject Vehicles Imported**

**79540**

**From:** "Isin, Amelie" <Isin.Amelie@epa.gov>  
**To:** Colin Wang <Colin.Wang@erg.com>, Andrew Loll <Andrew.Loll@erg.com>  
**Date:** 8/22/2013 8:32 AM  
**Subject:** FW: FedEx Tracking No. For Two Exhaust System From TAOTAO

Colin,

See tracking number below.

Amelie

From: Jackie Wang [mailto:jackie@taotao.us]  
Sent: Wednesday, August 21, 2013 6:55 PM  
To: Thompson, Christopher; Isin, Amelie; margaret (Harrison Wolf)  
Subject: FedEx Tracking No. For Two Exhaust System From TAOTAO

Hi Chris,

Thanks for calling me today. The two mufflers (Engine Family DTAOX0.12A1T, Entry # ES2-02051075) are on the way to Eastern Research Group now. They will receive them tomorrow.

The FedEx tracking no is 5562 2951 4240.

My co-workers in TX warehouse took photos while they took the mufflers off the units. I am attaching all the photos in this email too.

Thank you, Sir.

Jackie Wang  
TAOTAO USA INC. (L.A. Branch)  
Add: 14275 Telephone Ave, Unit A, Chino, CA 91710  
Site: [www.taotao.us](http://www.taotao.us)<<http://www.taotao.us>>  
Office: 909-614-1661  
Fax: 909-614-1501  
Cell: 909-859-4193 (24/7 available for our dealers)

## SAMPLE ORIGIN AND RECORD LOG (Received Vehicle, Engine, or Part)

I, Sam King of ERG hereby certify I received the following item; Exhaust System, from: \_\_\_\_\_ of the EPA, marked:

Entry No.: ES2-02051075 Date Received: 8/22/13

VIN: LSNAAFTD5DL004845 or LSNAAFTD0D1004848

From a: \_\_\_\_\_  
Year Make Model

With USEPA Engine Family: DTA OX0.12A1T  
Engine Family

I further certify on 8/23/13 I secured the described item and have sole access.  
Signature: \_\_\_\_\_ Date & Time: 8/23/13 10:00

### CHAIN OF CUSTODY

Date and Time	Released By:	Received By:	Remarks
	Name:	Name: <u>Sam King</u>	<u>Received via FedEx tracking # 5562 29 524240</u>
	Organization:	Organization: <u>ERG</u>	
	Signature:	Signature: <u>[Signature]</u>	
	Name:	Name:	
	Organization:	Organization:	
	Signature:	Signature:	
	Name:	Name:	
	Organization:	Organization:	
	Signature:	Signature:	
	Name:	Name:	
	Organization:	Organization:	
	Signature:	Signature:	
	Name:	Name:	
	Organization:	Organization:	
	Signature:	Signature:	

# SAMPLE ORIGIN AND RECORD LOG (Removed Parts)

I, Sam King of ERG hereby certify I removed the following item: Catalyst, from the vehicle or engine marked:

Entry No.: ES2-02051075 Date & Time Removed: 11/20/13 10:30 AM

VIN: LSNAAF1D5D1004045 or LSNAAF1D001004048

From a: \_\_\_\_\_  
Year Make Model

With USEPA Engine Family: DTA0X0.12A1T  
Engine Family

I further certify on 11/20/13 I secured the described item and have sole access.

Signature: [Signature] Date & Time: 11/20/13 11:30 AM

### CHAIN OF CUSTODY

Date and Time	Released By:	Received By:	Remarks
	Name:	Name:	
	Organization:	Organization:	
	Signature:	Signature:	
	Name:	Name:	
	Organization:	Organization:	
	Signature:	Signature:	
	Name:	Name:	
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	Name:	Name:	
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	Organization:	Organization:	
	Signature:	Signature:	

**From:** Colin Wang [<mailto:Colin.Wang@erg.com>]  
**Sent:** Tuesday, December 03, 2013 11:38 AM  
**To:** Isin, Amelie  
**Cc:** Andrew Loll ; Brent Ruminski ; Sam King ; Steve Strackbein ; Teresa Medley  
**Subject:** TD2 Tao Tao Catalyst Analysis - Dimensions and PM  
**Attachments:** TD2.TaoTao.L5NAAFTD5D1004845\_2013.12.03.xlsx

**Follow Up Flag:** Follow Up  
**Flag Status:** Completed

Hi Amelie - here are the results from the Tao Tao catalyst we received in August and held until your request to test it in November. The dimensions look good but the precious metals ratios and content do not. Also please note that we do not know the exact VIN for this sample. It is either one of the listed VINS but the 2 exhaust systems we received were not marked so we could not differentiate.

Colin Wang

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ERG [www.erg.com](http://www.erg.com)  
14555 Avion Parkway, Chantilly, VA  
Phone: 703.633.1671  
Fax: 703.263.7280