

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR**

In the Matter of:

Taotao USA, Inc.,
Taotao Group Co., Ltd., and
Jinyun County Xiangyuan Industry Co., Ltd.

Respondents.

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)
)
)
)
)

Docket No. CAA-HQ-2015-8065

Proof of Service

On June 24, 2016, and June 28, 2016, copies of the Amended Complaint in the above captioned matter and 40 C.F.R. Part 22 were served by hand-delivery on respondents Taotao USA, Inc., Taotao Group, Co., Ltd., and Jinyun County Xiangyuan Industry Co., Ltd. (collectively "Respondents"), and to Respondents' counsel, in conjunction with the Complainant's Motion for Leave to Amend the Complaint and to Extend Prehearing Deadlines ("Motion"). Copies of the affidavits of the process servers are attached to this filing as Attachment 1. Electronic copies of the Amended Complaint, 40 C.F.R. Part 22, and Motion were also sent to Respondents' counsel via e-mail on June 16, 2016.

Following issuance of the July 5, 2016, Order granting Complainant leave to amend, Complainant again served copies of the Amended Complaint and 40 C.F.R. Part 22 on the Respondents, this time via certified mail, return receipt requested, consistent with 40 C.F.R. § 22.5(b)(1). Complainant has received return receipts from Respondents' counsel, and from Taotao USA, Inc. for Jinyun County Xiangyuan Industry Co., Ltd., and copies of these return receipts are attached as Attachment 2. Complainant has not yet received return receipts from Taotao USA, Inc. on behalf of itself, or from Taotao USA, Inc. on behalf of Taotao Group Co., Ltd. A copy of the Certified Mail receipt for each mailing, including the mailings to Taotao USA, Inc., and to Taotao Group Co., Ltd. c/o Taotao USA, Inc., with tracking information obtained from the United States Postal Service demonstrating delivery, are attached as Attachment 3.

Respectfully Submitted,



Edward Kulschinsky, Attorney Adviser
Air Enforcement Division
1200 Pennsylvania Ave., N.W.
Room 1142C, Mailcode 2242A
Washington, DC 20460
(202) 564-6850
kulschinsky.edward@epa.gov

CERTIFICATE OF SERVICE

I certify that the forgoing Proof of Service was filed and served on the Presiding Officer this day through the Office of Administrative Law Judge's E-Filing System.

I certify that three copies of the foregoing Proof of Service were 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

AUG 04 2016

Date



Edward Kulschinsky, Attorney Adviser
Air Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
1200 Pennsylvania Ave., N.W.
William J. Clinton Federal Building
Room 1142C, Mailcode 2242A
Washington, DC 20460
p. (202) 564-6850
f. (202) 564-0069
kulschinsky.edward@epa.gov

Attachment 1

AFFIDAVIT OF SERVICE

State of Washington DC

County of

U.S. Environmental Protection
Agency Court

Case Number: CAA-HQ-2015-8065

In the Matter of:

**Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan
Industry Co., Ltd.**

For: U.S. Environmental Protection Agency, Air Enforcement Division

Received by One Legal, LLC on the 24th day of June, 2016 at 11:08 am to be served on **Taotao USA, Inc. by serving its President, Matao Cao, 2201 Luna Road, Carrollton, TX 75006.** I, **Carlos Barrera**, being duly sworn, depose and say that on the 28 day of JUNE, 2016 at 1:15 p.m., executed service by delivering a true copy of the **Motion for Leave to Amend the Complaint and to Extend Prehearing Deadlines with Certificate of Service and Amended Complaint with Certificate of Service and Copies of EPA Statutes Pages 241 Through 266** in accordance with state statutes in the manner marked below:

() PUBLIC AGENCY: By serving _____ as _____ of the
within-named agency.

() SUBSTITUTE SERVICE: By serving _____ as _____.

(x) CORPORATE SERVICE: By serving Lee Yin as
Authorized to Accept

() OTHER SERVICE: As described in the Comments below by serving _____ as _____.

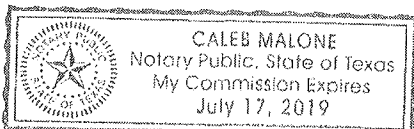
() NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: _____

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 30
day of June, 2016 by the affiant who
is personally known to me.

NOTARY PUBLIC



Ch. Barrera
PROCESS SERVER # SCH5305 Exp: 6/30/18
Appointed in accordance with State Statutes

One Legal, LLC
68 Mitchell Drive
Ste. 250
San Rafael, CA 94903
(800) 938-8815

Our Job Serial Number: 2016004586
Ref: 10376873

AFFIDAVIT OF SERVICE

State of Washington DC

County of

U.S. Environmental Protection
Agency Court

Case Number: CAA-HQ-2015-8065

In the Matter of:

Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan
Industry Co., Ltd.

For: U.S. Environmental Protection Agency, Air Enforcement Division

Received by One Legal, LLC on the 24th day of June, 2016 at 11:08 am to be served on **Taotao Group Co., Ltd. c/o Taotao USA, Inc. Attn. Mateo Cao, 2201 Luna Road, Carrollton, TX 75006. I, Carlos Barrera**, being duly sworn, depose and say that on the 24 day of JUNE, 2016 at 3:30 p.m., executed service by delivering a true copy of the **Motion for Leave to Amend the Complaint and to Extend Prehearing Deadlines with Certificate of Service and Amended Complaint with Certificate of Service and Copies of EPA Statutes Pages 241 Through 266** in accordance with state statutes in the manner marked below:

() PUBLIC AGENCY: By serving _____ as _____ of the within-named agency.

() SUBSTITUTE SERVICE: By serving _____ as _____

(x) CORPORATE SERVICE: By serving Party as Authorized to Receive

() OTHER SERVICE: As described in the Comments below by serving _____ as _____

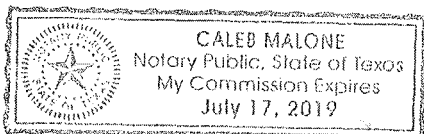
() NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: _____

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 27
day of June, 2016 by the affiant who
is personally known to me [Signature]

NOTARY PUBLIC



[Signature]
PROCESS SERVER # SCH5305 Exp: 6/30/18
Appointed in accordance with State Statutes

One Legal, LLC
68 Mitchell Drive
Ste. 250
San Rafael, CA 94903
(800) 938-8815

Our Job Serial Number: 2016004538
Ref: 10376874

AFFIDAVIT OF SERVICE

State of Washington DC

County of

U.S. Environmental Protection
Agency Court

Case Number: CAA-HQ-2015-8065

In the Matter of:

Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan
Industry Co., Ltd.

For: U.S. Environmental Protection Agency, Air Enforcement Division

Received by One Legal, LLC on the 24th day of June, 2016 at 11:08 am to be served on Jinyun County Xiangyuan Industry Co., Ltd. c/o Taotao USA, Inc., 2201 Luna Road, Carrollton, TX 75006. I, Carlos Barrera, being duly sworn, depose and say that on the 24 day of JUNE, 2016 at 3:30 p.m., executed service by delivering a true copy of the Motion for Leave to Amend the Complaint and to Extend Prehearing Deadlines with Certificate of Service and Amended Complaint with Certificate of Service and Copies of EPA Statutes Pages 241 Through 266 in accordance with state statutes in the manner marked below:

() PUBLIC AGENCY: By serving _____ as _____ of the within-named agency.

() SUBSTITUTE SERVICE: By serving _____ as _____

() CORPORATE SERVICE: By serving Pat as Assistant to Director

() OTHER SERVICE: As described in the Comments below by serving _____ as _____

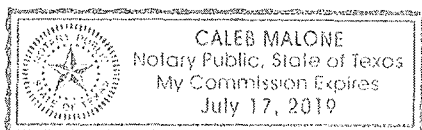
() NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: _____

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 27
day of June, 2016 by the affiant who
is personally known to me.

NOTARY PUBLIC



Lib
PROCESS SERVER # SCH5305 Exp: 6/30/18
Appointed in accordance with State Statutes

One Legal, LLC
68 Mitchell Drive
Ste. 250
San Rafael, CA 94903
(800) 938-8815

Our Job Serial Number: 2016004539
Ref: 10376874

AFFIDAVIT OF SERVICE

State of Washington DC

County of

U.S. Environmental Protection
Agency Court

Case Number: CAA-HQ-2015-8065

In the Matter of:

Taotao USA, Inc., Taotao Group Co., Ltd., and Jinyun County Xiangyuan
Industry Co., Ltd.

For: U.S. Environmental Protection Agency, Air Enforcement Division

Received by One Legal, LLC on the 24th day of June, 2016 at 11:08 am to be served on William Chu, Law Offices of William Chu, 4455 LBJ Freeway, Dallas, TX 75244. I, Calvin Malone, being duly sworn, depose and say that on the 24 day of June, 2016 at 3:58 p.m., executed service by delivering a true copy of the Motion for Leave to Amend the Complaint and to Extend Prehearing Deadlines with Certificate of Service and Amended Complaint with Certificate of Service and Copies of EPA Statutes Pages 241 Through 266 in accordance with state statutes in the manner marked below:

☒ INDIVIDUAL SERVICE: Served the within-named person.

() SUBSTITUTE SERVICE: By serving _____ as _____

() POSTED SERVICE: After attempting service to the front door or front locked gate on the property described herein.

() NON SERVICE: For the reason detailed in the Comments below.

Military Status: () Yes or () No If yes, what branch? _____

Marital Status: () Married or () Single Name of Spouse _____

COMMENTS: _____

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and Sworn to before me on the 26
day of June, 2016 by the affiant who
is personally known to me.

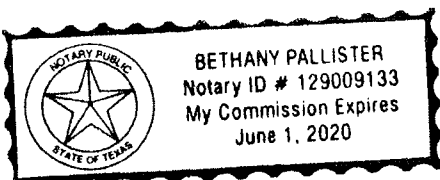
Bethany Pallister
NOTARY PUBLIC

Calvin Malone

PROCESS SERVER # SC41574 exp 10/31/17
Appointed in accordance with State Statutes

One Legal, LLC
68 Mitchell Drive
Ste. 250
San Rafael, CA 94903
(800) 938-8815

Our Job Serial Number: 2016004536
Ref: 10377654



Attachment 2

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Law Offices of William Chu
Attention: William Chu
4455 LBJ Freeway #909
Dallas, TX 75244

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7008 3230 0000 9394 7023

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jinyun County Xiangyuan Industry Co., Ltd.
C/O Taotao USA, Inc.
Attention: Matao Cao, President
2201 Luna Road
Carrollton, TX 75006

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from s

7008 3230 0000 9394 7030

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Edward Kulschinsky, Attorney Adviser
Air Enforcement Division
Office of Civil Enforcement
1200 Pennsylvania Ave., NW
Room 1142C, Mailcode 2242A
Washington, DC 20460

JUL 25 2016



FCL20277999



UNITED STATES POSTAL SERVICE

TEXAS
DALLAS 750
JUL 25 2016
PM 10:11



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Edward Kulschinsky, Attorney Adviser
Air Enforcement Division
Office of Civil Enforcement
1200 Pennsylvania Ave., NW
Room 1142C, Mailcode 2242A
Washington, DC 20460

JUL 25 2016



FCL20278874



Attachment 3

7006 3230 0000 9394 7016

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CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com[®]
OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Taotao USA, Inc.
Attention: Matao Cao, President
2201 Luna Road
Carrollton, TX 75006

Instructions

7006 3230 0000 9394 7023

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com[®]
OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Law Offices of William Chu
Attention: William Chu
4455 LBJ Freeway #909
Dallas, TX 75244

Instructions

7006 3230 0000 9394 7047

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
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OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Taotao Group Co., Ltd.
C/O Taotao USA, Inc.
Attention: Matao Cao, President
2201 Luna Road
Carrollton, TX 75006

7006 3230 0000 9394 7030

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com[®]
OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Jinyun County Xiangyuan Industry Co., Ltd.
C/O Taotao USA, Inc.
Attention: Matao Cao, President
2201 Luna Road
Carrollton, TX 75006



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Delivered

Updated Delivery Day: Monday, July 18, 2016

Product & Tracking Information

Postal Product:

Features:

Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
July 18, 2016 , 1:52 pm	Delivered, Front Desk/Reception	CARROLLTON, TX 75006
Your item was delivered to the front desk or reception area at 1:52 pm on July 18, 2016 in CARROLLTON, TX 75006.		
July 18, 2016 , 8:49 am	Out for Delivery	CARROLLTON, TX 75006
July 18, 2016 , 8:38 am	Sorting Complete	CARROLLTON, TX 75006
July 18, 2016 , 4:54 am	Arrived at Unit	CARROLLTON, TX 75006
July 16, 2016 , 1:55 am	Departed USPS Facility	NORTH TEXAS PROCESSING AND DISTRIBUTION CENTER
July 15, 2016 , 2:10 pm	Arrived at USPS Facility	NORTH TEXAS PROCESSING AND DISTRIBUTION CENTER
July 14, 2016 , 7:28 pm	Departed USPS Facility	GAITHERSBURG, MD 20898
July 13, 2016 , 11:05 pm	Arrived at USPS Facility	GAITHERSBURG, MD 20898

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Tracking Number: 70083230000093947023



Delivered

Product & Tracking Information

Postal Product:

Features:

Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
July 18, 2016 , 4:55 pm	Delivered, To Mail Room	DALLAS, TX 75244
Your item has been delivered to the mail room at 4:55 pm on July 18, 2016 in DALLAS, TX 75244.		
July 16, 2016 , 8:59 pm	Departed USPS Facility	DALLAS, TX 75260
July 16, 2016 , 3:07 pm	Arrived at USPS Facility	DALLAS, TX 75260
July 14, 2016 , 7:28 pm	Departed USPS Facility	GAITHERSBURG, MD 20898
July 13, 2016 , 11:06 pm	Arrived at USPS Facility	GAITHERSBURG, MD 20898

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Delivered

Updated Delivery Day: Monday, July 18, 2016

Product & Tracking Information

Postal Product:

Features:

Certified Mail™

DATE & TIME	STATUS OF ITEM	LOCATION
July 18, 2016 , 1:52 pm	Delivered, Front Desk/Reception	CARROLLTON, TX 75006
Your item was delivered to the front desk or reception area at 1:52 pm on July 18, 2016 in CARROLLTON, TX 75006.		
July 18, 2016 , 8:49 am	Out for Delivery	CARROLLTON, TX 75006
July 18, 2016 , 8:38 am	Sorting Complete	CARROLLTON, TX 75006
July 18, 2016 , 4:54 am	Arrived at Unit	CARROLLTON, TX 75006
July 16, 2016 , 1:55 am	Departed USPS Facility	NORTH TEXAS PROCESSING AND DISTRIBUTION CENTER
July 15, 2016 , 2:10 pm	Arrived at USPS Facility	NORTH TEXAS PROCESSING AND DISTRIBUTION CENTER
July 14, 2016 , 7:28 pm	Departed USPS Facility	GAITHERSBURG, MD 20898
July 13, 2016 , 11:05 pm	Arrived at USPS Facility	GAITHERSBURG, MD 20898

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Tracking (or receipt) number

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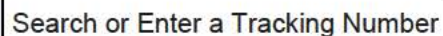
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Updated Delivery Day: Monday, July 18, 2016.

Certified Mail™

Your item was delivered to the front desk or reception area at 1:52 pm on July 18, 2016 in CARROLLTON, TX 75006.

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