

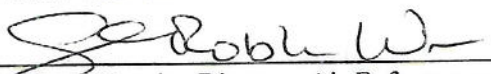
**Enclosure**  
**CLEAN AIR ACT MOBILE SOURCE EXPEDITED SETTLEMENT AGREEMENT**

DOCKET NO. CAA-10-7917

Respondent: Jie Liu, President  
JNL Trading, LLC  
4325 Augusta Road  
Lexington, SC 29013

1. The parties enter into this Clean Air Act Mobile Source Expedited Settlement Agreement (Agreement) in order to settle the civil violations discovered as a result of the inspection specified in Table 1, attached, incorporated into this Agreement by reference. The civil violations that are the subject of this Agreement are described in Table 2, attached, incorporated into the Agreement by reference, regarding the vehicles/engines specified therein.
2. Respondent admits being subject to the Clean Air Act (CAA) and its associated regulations and that the United States Environmental Protection Agency (EPA) has jurisdiction over the Respondent and the Respondent's conduct described in Table 2. Respondent does not contest the findings detailed therein, and waives any objections Respondent may have to EPA's jurisdiction.
3. Respondent consents to the payment of a penalty in the amount of \$3,700, further described in Table 3, attached, incorporated into the Agreement by reference. Respondent agrees to follow the instructions in "CAA Mobile Source Expedited Settlement Agreement Instructions," attached, incorporated into this Agreement by reference. Respondent certifies that the required remediation, detailed in Table 3, has been carried out.
4. By its first signature below, EPA approves the findings resulting from the inspection and alleged violations set forth in Table 1 and Table 2. Upon signing and returning this Expedited Settlement Agreement to EPA, Respondent consents to the terms of the Expedited Settlement without further notice. Respondent acknowledges that this Expedited Settlement Agreement is binding on the parties signing below, and becomes effective on the date of the EPA Air Enforcement Division Director's ratifying signature.

APPROVED BY EPA:

*for*   
Phillip A. Brooks, Director, Air Enforcement Division

Date: 6/7/10

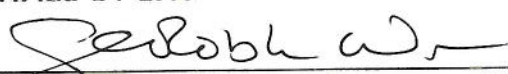
APPROVED BY RESPONDENT:

Name (print): Jie Liu

Title (print): President

Signature: 

RATIFIED BY EPA:

*for*   
Phillip A. Brooks, Director, Air Enforcement Division

Date: 9/28/2010

**Table 1 - Inspection Information**

<b>Entry/Inspection Date(s):</b>		<b>Docket Number:</b>	
January 25, 2010		C A A - 1 0 - 7 9 1 7	
<b>Inspection Location:</b>		<b>Entry/Inspection Number(s)</b>	
CBP Warehouse # 27		E S 3 - 2 0 3 9 6 0 9 - 7	
<b>Address:</b>			
Garden City Terminal		B 2 0 2 0 3 1 0 1 0 3 5	
<b>City:</b>		<b>Inspector(s) Name(s):</b>	
Garden City		CBPO Mitchell Kent, Ben Foster, Louie Hooper	
<b>State:</b>	<b>Zip Code:</b>	<b>EPA Approving Official:</b>	
GA	31408	Phillip A. Brooks	
<b>Respondent:</b>		<b>EPA Enforcement Contact:</b>	
JNL Trading, LLC		Robert Polin 202-564-6961	

**Table 2 - Description of Violation and Vehicles/Engines**

JNL Trading, LLC imported 60 off-highway motorcycles claimed to be covered by the EPA certificate of conformity (COC) for engine family 9GYGX.125HNA. Based upon inspections by EPA's contractor and the U.S. Department of Homeland Security's Bureau of Customs and Border Protection, EPA determined that the carburetors on the motorcycles have easily removable main jets and needle jets that are adjustable via retaining clips; modifications of this type will affect emissions, and were not described as design features of these motorcycles. The COC covers only those motorcycles that conform in all material respects to the design described in the application for the COC, and since the application for the COC for engine family 9GYGX.125HNA states that there are no adjustable parameters on these vehicles, and does include the required description for replaceable main jets, the motorcycles are not covered by the COC. Inspections also revealed that the crankcases on the motorcycles allow emissions to vent directly to the atmosphere. 40 C.F.R. § 1051.115(a) requires the engine crankcase on a motorcycle to be closed and not capable of venting directly to atmosphere. The application for the COC states that the motorcycles will comply with all regulatory requirements. Thus, the motorcycles are materially different from the design described in the application for the COC, and for this additional reason are not covered by the COC. Also, EPA determined that the emission control information labels on the motorcycles could be removed without being destroyed or defaced. 40 C.F.R. § 1051.135 requires that the labels not be removable without being destroyed or defaced. 40 C.F.R. § 1068.101(a) prohibits the importation of vehicles that are not covered by a COC and the introduction into U.S. commerce of vehicles that do not bear the required label or tag.

Equipment Description	Engine Family	Manufacturer	Model Year	Quantity
HN90GY-1 (86 cc)	9GYGX.125HNA	Wuxi Huina Vehicle Co., Ltd.	2009	30
HN70GY-1 (72 cc)	9GYGX.125HNA	Wuxi Huina Vehicle Co., Ltd.	2009	30

**Table 3 - Penalty and Required Remediation**

<b>Penalty</b>	\$3,700
<b>Required Remediation</b>	JNL Trading, LLC must provide EPA with a report and documentation showing that the 60 motorcycles described in Table 2 have been exported to a country other than Canada or Mexico or destroyed.