

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

DOCKET NO. CAA-15-8250

Respondent: CLS Products LLC  
16828 NE Mason Ct.  
Portland, OR 97230

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 the EPA's jurisdiction.
3. Respondent consents to the payment of a penalty in the amount of \$900, further described in Table 3, attached, incorporated into this 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, the EPA approves the findings resulting from the inspection and alleged violations set forth in Table 1 and Table 2. Upon signing and returning this Agreement to the EPA, Respondent consents to the terms of this Agreement without further notice. Respondent acknowledges that this Agreement is binding on the parties signing below, and becomes effective on the date of the EPA Region 10's Office of Compliance and Enforcement Director's ratifying signature.

APPROVED BY THE EPA:

[Redacted Signature]

Date: 8/11/2015

Edward J. Kowalski, Director, Office of Compliance and Enforcement

APPROVED BY RESPONDENT:

Name (print): [Redacted]

Title (print): [Redacted]

Signature: [Redacted]

Date: 8/19/15

RATIFIED BY THE EPA:

[Redacted Signature]

Date: 12/10/2015

Edward J. Kowalski, Director, Office of Compliance and Enforcement

**Table 1 - Inspection Information**

<b>Entry/Inspection Date(s):</b>		<b>Docket Number:</b>	
Feb. 27, 2015 (entry); March 10-19, 2015 (insp.)		C A A - 1 5 - 8 2 5 0	
<b>Inspection Location:</b>		<b>Entry/Inspection Number(s)</b>	
Terminal Transfer Inc.		A C 1 - 1 3 5 0 3 1 5 - 8	
<b>Address:</b>			
15745 North Lombard St., STE 100			
<b>City:</b>		<b>Inspector(s) Name(s):</b>	
Portland		CBP Officer Erich Mohr	
<b>State:</b>	<b>Zip Code:</b>	<b>EPA Approving Official:</b>	
OR	97203	Edward J. Kowalski	
<b>Respondent:</b>		<b>EPA Enforcement Contact:</b>	
CLS Products LLC		John Keenan, 206-553-1817	

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

This entry contains equipment with the engines described in the table below (Subject Equipment). Based on an inspection of the Subject Equipment, EPA determined that the Subject Equipment was not covered by an evaporative certificate of conformity and did not bear the required labels. See 40 C.F.R. §§ 1060.135, 1060.137, and 1060.601. Thus, CLS Products LLC imported the Subject Equipment in violation of 40 C.F.R. §§ 1060.15(b) and 1068.101(a)(1) and section 203(a)(1) of the Clean Air Act.

Equipment Description	Alleged Engine Family	Equipment Manufacturer	Engine Model Year	Quantity
Curbing Machine	EKHXS.2081GA	Laizhou Sunpower Machinery Co., Ltd.	2014	6
Power Trencher	EKHXS.2081GA	Laizhou Sunpower Machinery Co., Ltd.	2014	5
Sod Cutter	EKHXS.1961GA	Laizhou Sunpower Machinery Co., Ltd.	2014	3

**Table 3 - Penalty and Required Remediation**

Penalty	\$900
Required Remediation	CLS Products LLC must provide the EPA with documentation showing that the equipment described in Table 2 has been seized, destroyed, or exported outside of the U.S., Canada and Mexico.