

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

DOCKET NO. AED-17-8297 Respondent: Brilliant Stone Enterprises Inc.  
dba Kin Road USA  
11220 Petal Street, Suite B  
Dallas, TX 75238



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 to 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 \$3,800, 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 Air Enforcement Division Director's ratifying signature.

APPROVED BY EPA:

 Evan Belser  
for Phillip A. Brooks, Director, Air Enforcement Division


Date: Jan. 4, 2017

APPROVED BY RESPONDENT:

Name (print): Bin Wang  
Title (print): President  
Signature:   


Date: 01/19/2017

RATIFIED BY EPA:

  
for Phillip A. Brooks, Director, Air Enforcement Division

Date: 2/16/2017

**Table 1 - Inspection Information**

<b>Entry/Inspection Date(s):</b>		<b>Docket Number:</b>	
July 6, 2016/ July 19, 2016		A E D - 1 7 - 8 2 9 7	
<b>Inspection Location:</b>		<b>Entry/Inspection Number(s)</b>	
Cal Cartage		A T G - 1 0 1 4 3 0 8 - 5	
<b>Address:</b>			
22351 Wilmington Avenue		2 0 1 6 0 7 1 9 1 4 4 1 0 1	
<b>City:</b>		<b>Inspector(s) Name(s):</b>	
Carson		Roshni Brahmhatt, Janice Chan, and Nathan Dancher	
<b>State:</b>	<b>Zip Code:</b>	<b>EPA Approving Official:</b>	
CA	90745	Phillip A. Brook	
<b>Respondent:</b>		<b>EPA Enforcement Contact:</b>	
Brilliant Stone Enterprises Inc. dba Kin Road USA		Janice Chan (Region 9), (415) 972-3308	

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

The 108 scooters described below (the Subject Vehicles) were imported by Brilliant Stone Enterprises, Inc. dba Kin Road USA (Brilliant Stone), and found to be uncertified under Title II of the Clean Air Act (CAA). Physical and chemical examination of the catalyst from one of the inspected Subject Vehicles reveals that it is materially different from the catalyst design specified in the application for the certificate of conformity (COC) for engine family GDKNC.049J21. Specifically, the precious metals composition in the tested sample differs from the certified design. The EPA has found no evidence that the Subject Vehicles are otherwise excluded from coverage. By importing the Subject Vehicles and introducing them into U.S. commerce, Brilliant Stone committed 108 violations of CAA §§ 203(a)(1) and 213(d), 42 U.S.C. §§ 7522(a)(1) and 7547(d), and 40 C.F.R. §§ 1068.101(a)(1) and (b)(5).

Engine / Equipment Description	Claimed Engine Manufacturer	Claimed Model Year	Claimed Engine Family	Quantity
Scooters	Ningbo Sanjiang Dykon Motorcycle Co. Ltd.	2016	GDKNC.049J21	108

**Table 3 - Penalty and Required Remediation**

Penalty	\$3,800
Required Remediation	Brilliant Stone must export the 108 uncertified Subject Vehicles to a country other than Canada or Mexico, and provide the EPA with a report documenting such exportation.