



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2852

**VIA EMAIL**

Goksen Elkas  
Vice President and Technical Director  
Etimine USA, Inc.  
411 Hackensack Ave.  
Hackensack, NJ 07601-3280  
[gelkas@etimineusa.com](mailto:gelkas@etimineusa.com)

Joseph Maher  
Nixon Peabody LLP  
799 9th Street NW  
Washington, DC 20001-5327  
[jmaher@nixonpeabody.com](mailto:jmaher@nixonpeabody.com)

Re: **In the Matter of: Etimine USA, Inc.**  
**Docket No. FIFRA-03-2025-0063**

Dear Messrs. Elkas and Maher:

Enclosed please find a true and correct copy of the ***Consent Agreement and Final Order*** ("Consent Agreement") which was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the Consent Agreement.

Etimine USA, Inc. must timely pay the agreed civil penalty within **30** days of 4/28/25. In accordance with the terms of the Consent Agreement, the case name and case docket number should be noted on the payment, and a copy of the check or electronic transfer instrument or receipt should be sent simultaneously by email, or within 24 hours of payment, to: (1) the EPA attorney, (2) the EPA Cincinnati Finance Center, and (3) the EPA Region 3 Regional Hearing Clerk.

For your file, I am also enclosing a copy of supporting memorandum from Environmental Protection Agency management to the Regional Judicial Officer. Please do not hesitate to contact the EPA Attorney, Humane Zia, at [zia.humane@epa.gov](mailto:zia.humane@epa.gov) if you have any questions regarding this matter.

Sincerely,

EPA Regional Hearing Clerk, Region 3

Enclosure

cc: Humane Zia, Senior Assistant Regional Counsel