

REGION 2

**EXPEDITED SETTLEMENT
AGREEMENT AND
FINAL ORDER**

¹ Target housing means any housing constructed prior to 1978, except housing for the elderly or persons with disabilities or any 0-bedroom dwelling (unless any child who is less than 6 years of age resides or is expected to reside in such housing).

- admits nor denies the factual findings contained therein; (4) consents to the assessment of the penalty; and (5) waives any right to contest the findings contained herein.
9. Respondent consents to the use of electronic signatures in this matter and to service upon it of a copy of this Expedited Settlement Agreement and Final Order ("ESA/FO") by an EPA employee other than the Regional Hearing Clerk via electronic mail. Delivery of the fully executed document to the email address provided in the preceding paragraph shall constitute Respondent's receipt and acceptance of the ESA/FO.
 10. By its signature below, Respondent certifies, subject to civil and criminal penalties for making a false submission to the United States Government, that: (1) the violations described in paragraphs 4 and 5, have been corrected; and (2) Respondent is submitting proof of payment of the civil penalty with this agreement.
 11. The civil penalty of \$2,000 (two thousand dollars and 00 cents) has been paid in accordance with the *Instructions for Making a Payment* that were provided to the Respondent.
 12. Upon the effective date of this Agreement, payment of the civil penalty shall constitute full settlement of the civil claims cited herein. Respondent will also provide within thirty days, if it has not already done so, a written statement outlining actions taken to correct the violations cited above.
 13. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this Agreement shall be claimed by Respondent as a deduction for federal, state, or local income tax purposes.
 14. EPA reserves all of its rights to take enforcement action for any other past, present, or future violations by Respondent of TSCA, any other federal statute or regulation, or this Agreement.
 15. Upon signing and returning this Agreement to EPA, Respondent waives the opportunity for a hearing or appeal pursuant to TSCA or 40 C.F.R. Part 22.
 16. Upon signing and returning this Agreement to EPA, Respondent waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order accompanying this Consent Agreement.
 17. Each party shall bear its own costs and fees, if any.
 18. This Agreement is binding on the parties signing below, and in accordance with 40 C.F.R. § 22.31(b), is effective upon filing with the Regional Hearing Clerk.

In the Matter of Kings Bay Construction
Docket Number: TSCA-02-205-9267

IT IS SO AGREED, Kings Bay Construction Corporation

Name (print): Tanveer Alam

Title (print): Managing Director

Signature: Tamoor Alam

Date: 09/11/2025

APPROVED BY EPA:

For

Kathleen Anderson, Director
Enforcement and Compliance Assurance Division

In the Matter of Kings Bay Construction Corporation
Docket Number TSCA-02-2025-9267

FINAL ORDER

The Regional Judicial Officer of EPA, Region 2, concurs in the foregoing Expedited Settlement Agreement in the case of In the Matter of Kings Bay Construction Corporation, bearing Docket No. TSCA-02-2025-9267. Said Expedited Settlement Agreement, having been duly accepted and entered into by the parties, is hereby ratified, incorporated into and issued as this Final Order, which shall become effective when filed with the Regional Hearing Clerk of EPA, Region 2. 40 C.F.R. § 22.31(b). This Final Order is being entered pursuant to the authority of 40 C.F.R. § 22.18(b)(3) and shall constitute an order issued under authority of Section 16(a) of TSCA 15 U.S.C. § 2615(a).

DATED: _____

Dana P. Friedman
Regional Judicial Officer
U.S. Environmental Protection Agency-Region 2
290 Broadway
New York, New York 10007-1866