

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

FILED

Apr 28, 2025

1:20 pm

U.S. EPA REGION 3
HEARING CLERK

In the Matter of: :
:
Etimine USA, Inc. : U.S. EPA Docket No. FIFRA-03-2025-0063
411 Hackensack Ave. :
Hackensack, NJ 07601-3280 : Proceeding under Section 14(a) of the Federal
: Insecticide, Fungicide and Rodenticide Act, 7
Respondent. : U.S.C. § 136/(a)

CONSENT AGREEMENT

PRELIMINARY STATEMENT

1. This Consent Agreement is entered into by the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3 ("Complainant" or "EPA") and Etimine USA, Inc. ("Respondent") (collectively the "Parties"), pursuant to Section 14(a) of the Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. § 136/(a)(1), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation, Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22. The Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA" or the "Act") authorizes the Administrator of the U.S. Environmental Protection Agency to assess penalties and undertake other actions required by this Consent Agreement. The Administrator has delegated this authority to the Regional Administrator who, in turn, has delegated the authority to enter into agreements concerning administrative penalties to the Complainant. This Consent Agreement and the attached Final Order (hereinafter jointly referred to as the "Consent Agreement and Final Order") resolve Complainant's civil penalty claims against Respondent under FIFRA for the violations alleged herein.
2. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant hereby simultaneously commences and resolves this administrative proceeding.

JURISDICTION

3. The EPA has jurisdiction over the above-captioned matter, as described in Paragraph 1, above.
4. The Consolidated Rules of Practice govern this administrative adjudicatory proceeding pursuant to 40 C.F.R. § 22.1(a)(1).

GENERAL PROVISIONS

5. For purposes of this proceeding only, Respondent admits the jurisdictional allegations set forth in this Consent Agreement and Final Order.
6. Except as provided in Paragraph 5, above, Respondent neither admits nor denies the specific factual allegations set forth in this Consent Agreement. This CAFO shall not be used as evidence in any other proceeding, except any proceeding to which the EPA is a party, including any proceeding to enforce this CAFO.
7. Respondent agrees not to contest the jurisdiction of EPA with respect to the execution of this Consent Agreement, the issuance of the attached Final Order, or the enforcement of this Consent Agreement and Final Order.
8. For purposes of this proceeding only, Respondent hereby expressly waives its right to contest the allegations set forth in this Consent Agreement and Final Order and waives its right to appeal the accompanying Final Order.
9. Respondent consents to the assessment of the civil penalty stated herein, to the issuance of any specified compliance order herein, and to any conditions specified herein.
10. Respondent shall bear its own costs and attorney's fees in connection with this proceeding.
11. Upon approval of this Consent Agreement, 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 the Consent Agreement.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

12. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of the Consolidated Rules of Practice, Complainant alleges and adopts the Findings of Fact and Conclusions of Law set forth immediately below.
13. Respondent is and was, at all times relevant to the violations alleged herein, a corporation incorporated in the Commonwealth of Pennsylvania with its principal place of business located at 411 Hackensack Ave., Hackensack, New Jersey 07601-3280.
14. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines a "person" as "any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not."

15. Respondent is a “person” as that term is defined in Section 2(s) of FIFRA, 7 U.S.C. § 136(s), and is subject to the assessment of civil penalties for the violations alleged herein.
16. EPA alleges that, at all times relevant to the violations alleged herein, Respondent’s product “Etidot-67” (EPA Reg. No. 90788-1) was a “pesticide” within the meaning of Section 2(u) of FIFRA, 7 U.S.C. § 136(u), and 40 C.F.R. § 152.3.
17. Respondent is and was, at all times relevant to the violations alleged herein, a “registrant, commercial applicator, wholesaler, dealer, retailer, or other distributor” within the meaning of Section 14(a)(1) of FIFRA, 7 U.S.C. § 136/(a)(1).
18. At all times relevant to the violations alleged herein, Respondent operated an EPA-registered pesticide producing establishment (EPA Est. No. 90788-DE-001) located at 700 New Castle Avenue, Wilmington, DE 19801 (“Facility”).
19. On August 8, 2023, an EPA inspector conducted a routine federal FIFRA producer establishment inspection of the Facility (the “Inspection”).
20. EPA alleges that, during the Inspection, Respondent’s representative explained to the EPA inspector that Etidot-67 is imported in supersac containers and repackaged at the Facility. EPA alleges that the company representative further explained that, once repackaged, the Etidot-67 is shipped to Respondent’s customers.
21. During the Inspection, the EPA inspector took photographs of the labels attached to the imported Etidot-67 and requested additional import documentation concerning Etidot-67 from Respondent.
22. Section 2(p) of FIFRA, 7 U.S.C. § 136(p), defines “label” as “the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers;” and defines “labeling” as “all labels and all other written, printed, or graphic matter – (A) accompanying the pesticide or device at any time; or (B) to which reference is made on the label or in literature accompanying the pesticide or device”
23. On August 8, 2023, following the Inspection, Respondent’s representative submitted additional import documentation to EPA.
24. On August 19, 2024, the EPA issued to Respondent a Show Cause letter explaining the nature of the violations alleged herein.
25. On October 23 and December 12, 2024, the parties took part in Opportunity to Confer meetings to discuss the alleged violations in the Show Cause letter.

Count 1 – Alleged Failure to File Reports

26. The information and allegations of the preceding paragraphs are incorporated by reference as though fully set forth herein.
27. Section 17(e) of FIFRA, 7 U.S.C. § 136o(e), provides that the Secretary of the Treasury, in consultation with the Administrator, shall prescribe regulations for the enforcement of Section 17(c) of FIFRA, entitled Importation of Pesticides and Devices. These regulations are found at 19 C.F.R. Part 12.
28. Pursuant to 19 C.F.R. § 12.112(a), an importer desiring to import pesticides or devices into the United States must submit to the Administrator of the EPA a Notice of Arrival of Pesticides and Devices (Environmental Protection Agency Form 3540-1, or "Notice of Arrival"), prior to the arrival of the shipment in the United States. In the alternative, the importer or the importer's agent may file an electronic alternative to the Notice of Arrival, with the filing of the entry documentation, via any U.S. Customs and Border Patrol ("CBP") authorized electronic data interchange system. Through the Notice of Arrival or the electronic alternative, the importer reports vital information to EPA such as the major active ingredients, quantity, port of entry, and points of contact, which allows EPA to make informed decisions, before pesticides arrive in the United States, as to whether such importation will pose unreasonable adverse effects on public health and the environment.
29. Pursuant to Section 12(a)(2)(N) of FIFRA, 7 U.S.C. § 136j(a)(2)(N), it is unlawful for any person who is a registrant, wholesaler, dealer, retailer, or other distributor to fail to file reports required by FIFRA.
30. EPA alleges that, on July 8, 2023, Respondent imported the pesticide Etidot-67 from the Republic of Türkiye into the United States, via Entry # 669-XXXX600-5, for distribution or sale to individuals, associations, partnerships, corporations, or other organized groups of persons.
31. EPA alleges that, on the occasion identified in Paragraph 29 herein, Respondent failed to timely submit the Notice of Arrival to the EPA Administrator or the electronic alternative, as required pursuant to 19 C.F.R. § 12.112(a).
32. EPA alleges that Respondent's act or omission, described in Paragraph 30 herein, constitutes an unlawful act per Section 12(a)(2)(N) of FIFRA, 7 U.S.C. § 136j(a)(2)(N), for which a civil penalty may be assessed pursuant to Section 14(a) of FIFRA, 7 U.S.C. § 136(a).

Count II – Alleged Sale and/or Distribution of Misbranded Pesticides

33. The information and allegations of the preceding paragraphs are incorporated by reference as though fully set forth herein.
34. Under FIFRA Section 12(a)(1)(E), 7 U.S.C. § 136j(a)(1)(E), it is unlawful for any person in any State to distribute or sell to any person “any pesticide which is adulterated or misbranded.”
35. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), defines “to distribute or sell” as “to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.” *See also* 40 C.F.R. § 152.3.
36. Pursuant to Section 2(q)(1)(D)-(G) of FIFRA, 7 U.S.C. § 136(q)(1)(D)-(G), a pesticide is misbranded if, *inter alia*, its label does not bear the registration number assigned under FIFRA to each establishment in which it was produced; any word, statement or other information required under FIFRA is not prominently placed on its label; its label does not contain directions for use which are necessary for effecting the purpose for which the product is intended and, if complied with . . . are adequate to protect health and the environment; or its label does not contain a warning or caution statement which may be necessary and if complied with . . . is adequate to protect health and the environment. *See also* 40 C.F.R. § 156.10(a)(1).
37. Pursuant to Section 2(q)(2) of FIFRA, 7 U.S.C. § 136(q)(2), a pesticide also is misbranded if there is not affixed to its immediate container . . . a label bearing the registration number assigned to the pesticide under FIFRA.
38. EPA alleges that the label affixed to the pesticide Etidot-67, which was allegedly imported by Respondent on July 8, 2023, as described in Paragraph 29 herein, was missing the following information required by Sections 2(q)(1) and (2) of FIFRA, 7 U.S.C. § 136(q)(1) and (2), and 40 C.F.R. § 156.10:
 - a. EPA Pesticide Registration Number (“EPA Reg. No.”);
 - b. EPA producing establishment number (“EPA Est. No.”) of the last place of production;
 - c. Complete ingredients statement which contains the name and percentage by weight of each active ingredient, and designates each active ingredient with the term “active ingredient”;
 - d. Full First Aid statement;

- e. Full precautionary statements (hazard to humans and domestic animals, user safety recommendations, environmental hazards); and
 - f. Directions for use, including storage and disposal.
39. EPA alleges that Respondent's alleged failure to include the required information on the labels of the pesticide Etidot-67 it imported, as described in Paragraph 37 herein, constitutes an unlawful act under Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), for which a civil penalty may be assessed pursuant to Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

CIVIL PENALTY

40. In settlement of EPA's claims for civil penalties for the violations alleged in this Consent Agreement, Respondent consents to the assessment of a civil penalty in the amount of twelve thousand six hundred dollars (\$12,600), which Respondent shall be liable to pay in accordance with the terms set forth below.
41. The civil penalty is based upon EPA's consideration of a number of factors, including the penalty criteria ("statutory factors") set forth in Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), including, the following: the size of the business of the person charged, the effect of the person's ability to continue in business, and the gravity of the violation. These factors were applied to the particular facts and circumstances of this case with specific reference to EPA's *FIFRA Enforcement Response Policy* (December 2009) which reflects the statutory penalty criteria and factors set forth Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), the appropriate *Adjustment of Civil Monetary Penalties for Inflation*, pursuant to 40 C.F.R. Part 19, and the applicable EPA memoranda addressing EPA's civil penalty policies to account for inflation.
42. Respondent agrees to pay a civil penalty in the amount of \$12,600 ("Assessed Penalty") within thirty (30) days of the Effective Date of this Consent Agreement and Final Order.
43. Respondent shall pay the Assessed Penalty and any interest, fees, and other charges due using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.
44. When making a payment, Respondent shall:
- a. Identify every payment with Respondent's name and the docket number of this Consent Agreement, FIFRA-03-2025-0063,
 - b. Concurrently with any payment or within 24 hours of any payment, Respondent shall serve Proof of Payment simultaneously **by email** to the following person(s):

Humane Zia
Senior Assistant Regional Counsel
zia.humane@epa.gov,

U.S. Environmental Protection Agency
Cincinnati Finance Center
CINWD_AcctsReceivable@epa.gov,

and

U.S. EPA Region 3 Regional Hearing Clerk
R3_Hearing_Clerk@epa.gov.

“Proof of Payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent’s name.

45. Interest, Charges, and Penalties on Late Payments. Pursuant to 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, the entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately due and owing, and EPA is authorized to recover the following amounts:
- a. Interest. Interest begins to accrue from the Effective Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. To protect the interests of the United States, the rate of interest is set at the Internal Revenue Service (“IRS”) standard underpayment rate, as any lower rate would fail to provide Respondent adequate incentive for timely payment.
 - b. Handling Charges. Respondent will be assessed monthly a charge to cover EPA’s costs of processing and handling overdue debts.
 - c. Late Payment Penalty. A late payment penalty of six percent (6%) per annum, will be assessed monthly on all debts, including any portion of the Assessed Penalty, interest, penalties, and other charges, that remain delinquent more than ninety (90) days.

46. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement, EPA may take additional actions. Such actions EPA may take include, but are not limited to, the following.
- a. Refer the debt to a credit reporting agency or a collection agency pursuant to 40 C.F.R. §§ 13.13 and 13.14.
 - b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the IRS for offset against income tax refunds, 40 C.F.R. Part 13, Subparts C and H.
 - c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, 40 C.F.R. § 13.17.
 - d. Request that the Attorney General bring a civil action in the appropriate district court to recover the amount outstanding pursuant to 7 U.S.C. § 136/(a)(5).
47. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.
48. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement shall not be deductible for purposes of federal taxes.
49. Payment of the civil penalty is due and payable immediately upon receipt by Respondent of a true and correct copy of the fully executed and filed Consent Agreement and Final Order. Receipt by Respondent or Respondent's legal counsel of such copy of the fully executed Consent Agreement and Final Order, with a date stamp indicating the date on which the Consent Agreement and Final Order was filed with the Regional Hearing Clerk, shall constitute receipt of written initial notice that a debt is owed EPA by Respondent in accordance with 40 C.F.R. § 13.9(a).
50. The parties consent to service of the Final Order by email at the following valid email addresses: zia.humane@epa.gov (for Complainant), and gelkas@etimineusa.com and jmaher@nixonpeabody.com (for Respondent).

GENERAL SETTLEMENT CONDITIONS

- 51. By signing this Consent Agreement, Respondent acknowledges that this Consent Agreement and Final Order will be available to the public and represents that, to the best of Respondent’s knowledge and belief, this Consent Agreement and Final Order does not contain any confidential business information or personally identifiable information from Respondent.
- 52. Respondent certifies that any information or representation it has supplied or made to EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. EPA shall have the right to institute further actions to recover appropriate relief if EPA obtains evidence that any information provided and/or representations made by Respondent to the EPA regarding matters relevant to this Consent Agreement and Final Order, including information about Respondent’s ability to pay a penalty, are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.

CERTIFICATION OF COMPLIANCE

- 53. Respondent certifies to EPA, upon personal investigation and to the best of its knowledge and belief, that it currently is in compliance with regard to the violations alleged in this Consent Agreement.

OTHER APPLICABLE LAWS

- 54. Nothing in this Consent Agreement and Final Order shall relieve Respondent of its obligation to comply with all applicable federal, state, and local laws and regulations, nor shall it restrict EPA’s authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on the validity of any federal, state or local permit. This Consent Agreement and Final Order does not constitute a waiver, suspension or modification of the requirements of FIFRA, or any regulations promulgated thereunder.

RESERVATION OF RIGHTS

- 55. This Consent Agreement and Final Order resolves only Respondent’s liability related to EPA’s claims for civil penalties for the specific violations alleged against Respondent in this Consent Agreement and Final Order. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA

determines may present an imminent and substantial endangerment to the public health, public welfare, or the environment. This settlement is subject to all limitations on the scope of resolution and to the reservation of rights set forth in Section 22.18(c) of the Consolidated Rules of Practice, 40 C.F.R. § 22.18(c). EPA reserves any rights and remedies available to it under FIFRA, the regulations promulgated thereunder and any other federal law or regulation to enforce the terms of this Consent Agreement and Final Order after its effective date. Respondent reserves whatever rights or defenses it may have to defend itself in any such action.

EXECUTION /PARTIES BOUND

56. This Consent Agreement and Final Order shall apply to and be binding upon the EPA, the Respondent and the officers, directors, employees, contractors, successors, agents and assigns of Respondent. By his or her signature below, the person who signs this Consent Agreement on behalf of Respondent is acknowledging that he or she is fully authorized by the Respondent to execute this Consent Agreement and to legally bind Respondent to the terms and conditions of this Consent Agreement and Final Order.

EFFECTIVE DATE

57. The effective date of this Consent Agreement and Final Order (“Effective Date”) is the date on which the Final Order, signed by the Regional Administrator of EPA, Region 3, or his/her designee, the Regional Judicial Officer, is filed along with the Consent Agreement with the Regional Hearing Clerk pursuant to the Consolidated Rules of Practice.

ENTIRE AGREEMENT

58. This Consent Agreement and Final Order constitutes the entire agreement and understanding between the Parties regarding settlement of all claims for civil penalties pertaining to the specific violations alleged herein and there are no representations, warranties, covenants, terms, or conditions agreed upon between the Parties other than those expressed in this Consent Agreement and Final Order.

For Respondent: Etimine USA, Inc.

Date: 4/15/2025

By:

[REDACTED]

[SIGNATORY NAME]

[SIGNATORY TITLE]

For the Complainant:

After reviewing the Consent Agreement and other pertinent matters, I, the undersigned Director of the Enforcement & Compliance Assurance Division of the United States Environmental Protection Agency, Region 3, agree to the terms and conditions of this Consent Agreement and recommend that the Regional Administrator, or his/her designee, the Regional Judicial Officer, issue the attached Final Order.

By: **Melvin, Karen** Digitally signed by Melvin, Karen
Date: 2025.04.28 08:07:39
-04'00'

[Digital Signature and Date]
Karen Melvin, Director
Enforcement & Compliance Assurance Division
U.S. EPA – Region 3
Complainant

Attorney for Complainant:

By: **HUMANE ZIA** Digitally signed by HUMANE ZIA
Date: 2025.04.22 10:37:36
-04'00'

[Digital Signature and Date]
Humane Zia
Senior Assistant Regional Counsel
U.S. EPA – Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

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: U.S.C. § 136/(a)

Respondent.

FINAL ORDER

Complainant, the Director of the Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region 3, and Respondent, Etimine USA, Inc., have executed a document entitled "Consent Agreement," which I hereby ratify as a Consent Agreement in accordance with the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits ("Consolidated Rules of Practice"), 40 C.F.R. Part 22 (with specific reference to Sections 22.13(b) and 22.18(b)(2) and (3)). The terms of the foregoing Consent Agreement are accepted by the undersigned and incorporated into this Final Order as if fully set forth at length herein.

Based upon the representations of the parties in the attached Consent Agreement, the penalty agreed to therein is based upon consideration of, *inter alia*, EPA's FIFRA Enforcement Response Policy (December 2009), and the statutory factors set forth in Section 14(a)(4) of FIFRA, 7 U.S.C. § 136/(a)(4).

NOW, THEREFORE, PURSUANT TO Section 14(a) of the Federal Insecticide, Fungicide and Rodenticide Act, 7 U.S.C. § 136/(a), and Section 22.18(b)(3) of the Consolidated Rules of Practice, **IT IS HEREBY ORDERED** that Respondent pay a civil penalty in the amount of **TWELVE THOUSAND AND SIX HUNDRED DOLLARS (\$12,600)**, in accordance with the payment provisions set forth in the Consent Agreement and in 40 C.F.R. § 22.31(c), and comply with the terms and conditions of the Consent Agreement.

This Final Order constitutes the final Agency action in this proceeding. This Final Order shall not in any case affect the right of the Agency or the United States to pursue appropriate injunctive or other equitable relief, or criminal sanctions for any violations of the law. This Final Order resolves only those causes of action alleged in the Consent Agreement and does not waive, extinguish or otherwise affect Respondent's obligation to comply with all applicable provisions of FIFRA and the regulations promulgated thereunder.

The effective date of the attached Consent Agreement and this Final Order is the date

on which this Final Order is filed with the Regional Hearing Clerk.

By: **JOSEPH LISA** Digitally signed by JOSEPH
LISA
Date: 2025.04.28 11:07:09
-04'00'

Joseph J. Lisa
Regional Judicial and Presiding Officer
U.S. EPA Region 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103

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: Insecticide, Fungicide and Rodenticide Act, 7
Respondent. : U.S.C. § 136/(a)

CERTIFICATE OF SERVICE

I certify that the foregoing *Consent Agreement and Final Order* was filed with the EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the *Consent Agreement and Final Order*. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Goksen Elkas
Vice President and Technical Director
Etimine USA, Inc.
gelkas@etimineusa.com

Joseph Maher
Stratton Constantinides
Nixon Peabody LLP
799 9th Street NW
Washington, DC 20001-5327
jmaher@nixonpeabody.com

Humane Zia
Senior Assistant Regional Counsel
U.S. EPA, Region 3
zia.humane@epa.gov

Holly Raguza
Compliance Officer
U.S. EPA, Region 3
raguza.holly@epa.gov

BEVIN ESPOSITO

Digitally signed by BEVIN
ESPOSITO
Date: 2025.04.28 13:22:50 -04'00'

[Digital Signature and Date]

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 3