

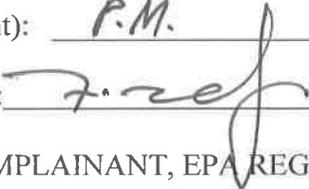
7. Upon the effective date of this Agreement, payment of the civil penalty shall constitute full settlement of the civil claim alleged herein.
8. No portion of the civil penalty paid by Respondent pursuant to this Agreement shall be claimed by Respondent or any other person as a deduction from federal, state, or local income taxes.
9. EPA reserves all of its rights to take enforcement action against Respondent for any other past, present, or future violations of TSCA, any other federal statute or regulation, or this Agreement.
10. Each party shall bear its own costs and fees, if any.
11. The undersigned representative of Respondent and the undersigned representative of Complainant each certifies that he or she is fully authorized to enter into this Agreement and to bind the party that he or she represents.
12. This Agreement is binding upon Respondent and its successors and assigns, and in accordance with 40 C.F.R. § 22.31(b), is effective upon the filing of the Final Order attached to the Agreement.

IT IS SO AGREED.

FOR RESPONDENT, WOODCLIFF CORPORATION

Name (print): FRED NEHORAY

Title (print): P.M.

Signature: 

Date 03-03-2021

FOR COMPLAINANT, EPA REGION IX

**MATTHEW
SALAZAR**

 Digitally signed by MATTHEW SALAZAR
Date: 2021.03.05 07:21:08 -08'00'

Date 03/05/2021

Matt Salazar, P.E.
Manager, Toxics Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region IX

FINAL ORDER

EPA Region IX and Respondent, having entered into the foregoing Expedited Settlement Agreement.

IT IS SO ORDERED:

STEVEN JAWGIEL

Digitally signed by STEVEN JAWGIEL
Date: 2021.03.10 15:13:46 -08'00'

Date _____

Steven L. Jawgiel
Regional Judicial Officer
U.S. EPA, Region IX

CERTIFICATE OF SERVICE

This is to certify that the fully executed Expedited Settlement Agreement and Final Order in the matter of Woodcliff Corporation was filed with the Regional Hearing Clerk and that a true and correct copy of the same was sent as follows:

RESPONDENT (via e-mail):

Omid Tabrizi
Vice President
Woodcliff Corporation
1849 Sawtelle Blvd, Ste. 610
Los Angeles, CA 90025
omid@woodcliff.net

COMPLAINANT (via e-mail):

Carol Bussey
Office of Regional Counsel
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
bussey.carol@epa.gov

Date

Regional Hearing Clerk
U.S. EPA, Region IX