

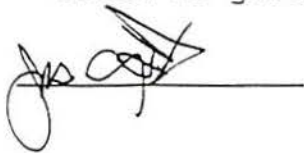
Pfizer, Inc.

TRADING AGREEMENT AND ORDER NO. 8093

1. After May 31, 1995, Pfizer shall acquire approved ERCs and document and record the amounts of all fuel and ERCs used by the boilers each month, and shall maintain and provide such records in accordance with the following and Section 22a-174-4 of the Regulations, until May 31, 1996:
 - A. Before the first day of each month, calculate projected ERCs required for the next calendar month as follows:

$$\text{ERCs (tons)} = (\text{Estimated Fuel Use in MMBtu} \times (.366 \text{ lb/MMBtu} - [.95 \times .25 \text{ lb/MMBtu}])) / 2000 \text{ pounds}$$
 - B. acquire sufficient approved ERCs no later than the first of each calendar month to assure compliance for, at a minimum, that calendar month, except for the months of June, July, August and September, 1995, for which approved ERCs must be acquired before September 30, 1995;
 - C. No later than the tenth day of each month, calculate ERCs used in the preceding calendar month;
 - D. Document and record monthly fuel and ERCs used;
 - E. No later than March 1, 1996 and March 1, 1997, include with its annual emissions report to the Commissioner, the fuel consumed and ERCs used for the previous calendar year; and
 - F. Retain records and supporting documentation as described in this section for a minimum of five years, commencing on the date such records were created.
 - G. Maintain documentation to attest to the fact that ERCs used during the ozone season were generated during the ozone season. The ozone season is May 1 to September 30 in any calendar year. Generator certification of this fact shall be sufficient.
 - H. Provide the records specified above to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner.
2. Prior to May 31, 1996, comply during operation of each boiler with a full load emission rate limitation of .366 lb/MMbtu heat input, averaged on a 24-hour basis.
3. No later than May 31, 1996, Pfizer shall comply with the requirements of Section 22a-174-22(d)(2) of the Regulations, as described in Pfizer's September 1, 1994 compliance plan, incorporated by reference herein, unless a written extension of this trading order is given by the Commissioner.

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4. On or before December 31, 1995, Pfizer shall submit a progress report to the Commissioner describing the actions Pfizer has taken to comply with this Trading Order to date and the status of the installation of new equipment.
5. As used in this Trading Order, "Commissioner" means the Commissioner of Environmental Protection or an agent of the Commissioner.
6. Notification of noncompliance. In the event that Pfizer becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this Trading Order or of any document required hereunder, Pfizer shall immediately notify the Commissioner and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. In so notifying the Commissioner, Pfizer shall state in writing the reasons for the noncompliance or delay and propose, for the review and written approval of the Commissioner, dates by which compliance will be achieved; and Pfizer shall comply with any dates which may be approved in writing by the Commissioner. Notification by Pfizer shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.
7. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Trading Order shall be signed by the chief executive officer of Pfizer or a duly authorized representative of such officer, as those terms are defined in Section 22a-430-3(b)(2) of the Regulations, and by the individual or individuals responsible for actually preparing such document, each of whom shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense, in accordance with Section 22a-6 of the Connecticut General Statutes, pursuant to Section 53a-157 of the Connecticut General Statutes, and in accordance with any other applicable statute."
8. Final Agreement and Order. This Trading Agreement and Order is the final agreement and order by and between the Commissioner and Pfizer with respect to the matters addressed herein, and shall not be modified

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without the written agreement of both parties.

9. False statements. Any false statement in any information submitted pursuant to this Trading Order may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes or, in accordance with Section 22a-6, under Section 53a-157 of the Connecticut General Statutes.
10. Notice of transfer; liability of Pfizer and others. Until May 31, 1996, Pfizer shall notify the Commissioner in writing no later than fifteen (15) days after transferring all or any portion of the operations, the facility or the business which are the subject of this Trading Order, or obtaining a new mailing or location address. Pfizer's obligations under this Trading Order shall not be affected by the passage of title to any property to any other person or municipality.
11. Commissioner's powers. Nothing in this Trading Order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law which are willful or criminally negligent or for which penalties have not been specifically provided in this Trading Order, including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the actions taken by Pfizer pursuant to this Trading Order have not fully achieved compliance with Section 22a-174-22(j) of the Regulations, the Commissioner may institute any independent proceeding to require Pfizer to undertake further investigation or further action.
12. Pfizer's obligations under law. Nothing in this Trading Order shall relieve Pfizer of other obligations under applicable federal, state and local law.
13. Access to records and facility. Any representative of the Department of Environmental Protection may enter the facility and inspect and copy records within normal business hours without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Trading Order.
14. No effect on rights of other persons. This Trading Order shall neither create nor affect any rights of persons who or municipalities which are not parties to this Trading Order.
15. Notice to Commissioner of changes. Within fifteen (15) days of the date Pfizer becomes aware of a change in any information submitted to the Commissioner under this Trading Order, or that any such information was inaccurate or misleading or that any relevant

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information was omitted, Pfizer shall submit the correct or omitted information to the Commissioner.

- 16. Submission of documents. Any document required to be submitted to the Commissioner under this Trading Order shall, unless otherwise specified in writing by the Commissioner, be directed to:

Ms. Wendy Jacobs
 Department of Environmental Protection
 Bureau of Air Management
 Engineering and Enforcement Division
 79 Elm Street
 Hartford, Connecticut 06106

Pfizer consents to the issuance of this Trading Order without further notice. The undersigned certifies that he/she is fully authorized to enter into this Trading Order and to legally bind Pfizer to the terms and conditions of the Trading Order.

Pfizer, Inc.

Signature: J. Robert Schachner
 Type Name: J. Robert Schachner
 Type Title: Plant Manager
 Date: June 30, 1995

Issued as a final consent order of the Commissioner of Environmental Protection on 19 July, 1995.

Sidney J. Holbrook
 Sidney J. Holbrook
 Commissioner

TOWN OF GROTON
 LAND RECORDS

MAILED CERTIFIED MAIL,
 RETURN RECEIPT REQUESTED

Certified Document No.