STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of	)	
	)	Trading Agreement
The State of Connecticut and	)	and Order No. 8136A
	)	Modification 1
Pfizer, Inc.	)	

Whereas, the Commissioner of Environmental Protection ("Commissioner") and Pfizer, Inc. (Pfizer) having agreed to the terms and conditions set forth in Trading Agreement and Order 8136A issued on April 14, 2003, do now, by mutual agreement, modify said Trading Agreement and Order as follows:

1. Delete the date April 30, 2007, and substitute therefor the date May 1, 2009, in paragraphs A.9., C.1., C.2., C.3.a.,C.4.

2. Delete paragraph C.4.b. and substitute the following therfor:

   No later then the twentieth day of each month, Pfizer shall calculate and permanently retire the actual DERCs used in the preceding calendar month, as follows:

   DERCs(tons) used={[(CEM-recorded NOx daily average emission rate in lbs/MMBtu*)-((0.95 x (NOx baseline emission limit or proportioned base line emission rate calculated pursuant to section 22a-174-22(f)(2)(A) of the regulations in lbs/MMBtu))] x (actual fuel use in MMBtu)} ÷ 2000 lbs/ton

   * This rate shall be calculated pursuant to the methodology described in 40 CFR part 60.

3. Delete paragraph C.8. and substitute the following therefor:

   DERC Doubling. At a minimum, approved DERCs required for compliance with this Trading Agreement and Order shall be adjusted upwards by 100% if DERCs are not in Pfizers possession prior to the first day of each month. However, nothing in this Trading Agreement and Order shall affect the Commissioner's authority to institute any proceeding or take any other action to require additional upward adjustment, based on the gravity of any alleged noncompliance or violation of law. Pfizer shall permanently retire DERCs calculated in accordance with the above plus a 100% premium within sixty (60) days of Pfizer's discovery of the DERC shortfall. Pfizer shall report any DERC

shortfall to the Commissioner in accordance with paragraph C.27. of this Trading Agreement and Order.

4. Delete paragraph C.10 and substitute the following therefor:

   Extension. No later than May 1, 2009, with respect to the boilers, Pfizer shall comply with the requirements of Sections 22a-174-22(d)(1) and 22a-174-22(d)(2)(A) of the Regulations and amendments thereto. There is no assurance that after full program review of this and other Trading Agreements and Orders that the Commissioner will grant a written extension of this Trading Agreement and Order.

5. Delete the word "individual" and substitute therefore the word "section" in paragraph C.27.

6. Delete the name "Mrs. Elizabeth McAuliffe" in paragraph C.28.

7. Include a new paragraph C.29. as follows:

   Future Compliance Report. On or before September 1, 2008, Pfizer shall submit a report in writing to the Commissioner, as directed in paragraph C.28. of this Trading Agreement and Order, indicating how the facility shall comply with section 22a-174-22 of the Regulations with respect to the boilers on and after May 1, 2009.

All other terms and conditions of Trading Agreement and Order No. 8136A issued by the Commissioner acting under Chapter 446c, Sections 22a-6, 22a-171, 22a-174, 22a-176, and 22a-177 of the Connecticut General Statutes shall remain in effect.

Pfizer hereby consents to the entry of this modification to the Trading Agreement and Order without further notice.

PFIZER, INC.

Signature: R. I. Lakeman

Name: Ian Lakeman

Title: PGM Site Leader

Date: 10/6/2006

Issued as a modification of an Order of the Commissioner of Environmental Protection

Gina McCarthy
Commissioner

10/17/06
Date

CITY OF GROTON LAND RECORDS
MAILED CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Certified Document No. 7005 3100 0001 2315 1055