STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of	)	
	)	Trading Agreement
The State of Connecticut and	)	and Order No. 8093C
	)	Modification 2
Pfizer, Inc.	)	

TRADING AGREEMENT AND ORDER MODIFICATION

In the matter of a Trading Agreement and Order between the Commissioner of Environmental Protection ("Commissioner") and Pfizer Inc. ("Pfizer").

WHEREAS, the Commissioner and Pfizer, having agreed to the terms and conditions set forth in Trading Agreement and Order No. 8093C signed by the Commissioner on April 29, 2003 and Trading Agreement and Order No. 8093C Modification 1 signed by the Commissioner on April 11, 2005, do now, by mutual agreement, modify said Trading Agreement and Order as follows:

1. Delete the dates May 1, 2005, and substitute therefor May 1, 2009, in paragraph A.6.

2. Delete the date May 1, 2005, and substitute therefor May 1, 2009, in paragraphs A.10., C.1., C.2., C.3.a., C.3.b., C.3.c., C.3.e., C.3.f., and C.6.

3. Delete paragraph C.6.b. and substitute the following therefor:

   During the non-ozone season:
   In addition to meeting the 24-hour emission limit in Table 22-1 of Section 22a-174-22 of the Regulations, Pfizer shall meet a non-ozone season average emission limit of 0.15 lb/MMBtu. Prior to October 1, 2006, October 1, 2007, and October 1, 2008, Pfizer shall estimate and acquire the amount of DERCs or allowances required for such non-ozone season needed to comply with Section 22a-174-22(e)(3) of the Regulations as follows:

   Estimated DERCs (tons) = [Estimated fuel use in MMBtu from October 1 through April 30 x (lower of the estimated seasonal average NOx emission rate or the proportioned 24-hour allowable emission limit in lb/MMBtu during October 1 through April 30 – (0.95 x 0.15 lb/MMBtu))] ÷ 2000 pounds/ton.

   No later than May 31, 2007, May 31, 2008, and May 31, 2009, in addition to the DERCs retired pursuant to paragraph C.6.a. of this Trading Agreement and Order, Pfizer shall calculate and permanently retire DERCs used in the

preceding non-ozone season as follows:

Actual DERCs (tons) = [Actual fuel use in MMBtu from October 1 through April 30 x (lower of the actual seasonal average NOx emission rate or the proportioned 24-hour allowable emission limit in lb/MMBtu during October 1 through April 30 – (0.95 x 0.15 lb/MMBtu))] ÷ 2000 pounds/ton.

4. Delete paragraph C.9. and substitute the following therefor:

Annual DERC Report and Non-Ozone Season Emission Statement. No later than March 1 for the previous calendar year and July 30 (for the October through April time period only starting in 2004) of every year after issuance of this Trading Agreement and Order, Pfizer shall submit in writing to the Commissioner, a record of each sale or other transfer, and use of any and all of the DERCs approved within and subsequent to issuance of this Trading Agreement and Order until all such DERCs have been used or are no longer in Pfizer's possession. Pfizer shall also include actual NOx emissions from the boilers and the amount of all DERCs used (including serial numbers (if assigned) and approved DERCs generated and/or purchased from other facilities), generated and/or approved for the previous calendar year and October through April time period. These reports shall be on a form prescribed by the Commissioner and shall be in monthly increments, and by ozone and non-ozone seasons.

5. Delete paragraph C.11. and substitute the following therefor:

DERC Shortfall. At a minimum, DERCs required shall be adjusted upwards by 100% if DERCs are not in Pfizer's possession for use prior to the first day of each month or applicable season. 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 the quantity of DERCs equivalent to the excess emissions plus a 100% premium within sixty (60) days of Pfizer's discovery of the DERC shortfall. Pfizer shall certify and report any such DERC retirement to the Commissioner in accordance with paragraph C.30 of this Trading Agreement and Order.

6. Delete paragraph C.13. and substitute the following therefor:

Extension. No later than May 1, 2009, with respect to the boilers 5 and 8, Pfizer shall comply with the requirements of Sections 22a-174-22(d)(1) and 22a-174-

22(d)(2)(A) of the Regulations. 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.

7. Delete paragraph C.14. and substitute the following therefor:

Future Compliance Report. On or before September 1, 2008, Pfizer shall submit a report in writing to the Commissioner, as directed in paragraph C.31. 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 5 and 8 on and after May 1, 2009.

8. Delete paragraph C.17. and substitute the following therefor:

Definitions. As used in this Trading Agreement and Order, "Approved DERCs" are those for which the Commissioner has provided written authorization for use in compliance with Section 22a-174-22 of the Regulations; "Commissioner" means the Commissioner or a representative of the Commissioner; "Non-ozone season" means the period from October 1 through April 30 in any given calendar year.

9. Delete paragraph C.18. and substitute the following therefor:

Dates. The date of "issuance" of this Trading Agreement and Order is the date the Trading Agreement and Order is deposited in the U.S. mail or personally delivered, whichever is earlier. The date of submission to the Commissioner of any document required by this Trading Agreement and Order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this Trading Agreement and Order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is deposited in the U.S. mail or is personally delivered, whichever is earlier. Except as otherwise specified in this Trading Agreement and Order, the word "day" as used in this Trading Agreement and Order means calendar day. Any document or action which is required by this Trading Agreement and Order to be submitted or performed by a date which falls on a Saturday, Sunday or a Connecticut or federal holiday shall be submitted or performed by the next day which is not a Saturday, Sunday or Connecticut or federal holiday.

10. Delete the word "individual" and substitute therefor the word "Unit" in paragraph C.30.

11. Delete the name "Mrs. Elizabeth McAuliffe" from paragraph C.31.

All other terms and conditions of Trading Agreement and Order No. 8093C 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

Type Name: Ian Lakeman

Type 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

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