



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Richard Barlow  
Project Manager  
Ferguson & Williams, LLC  
550 Main Street  
Stratford, CT 06497

Re: Consent Order No. 1924 and Operations of the US Army Stratford Army Engine Plant Site

Dear Mr. Barlow:

On May 15, 2008, representatives of the Department of Environmental Protection ("DEP") met with Ferguson & Williams, LLC (representing the U.S. Department of the Army) and Aquair Environmental Consultants, LLC to resolve proposed Consent Order No. 1924. Based on information obtained in that meeting, the Department was made fully aware of the fact that Ferguson & Williams, LLC operates the Stratford Army Engine Plant under a contractual arrangement with the U.S. Department of the Army. It also became clear that Ferguson & Williams, LLC operated the Stratford Army Engine Plant in violation of Section 22a-174-22 of the Regulations of Connecticut State Agencies ("RCSA"), Section 22a-174-33 of the RCSA, and in violation of Trading Agreement and Order #8137A ("TA&O #8137A").

Specifically, Ferguson & Williams, LLC operated boilers #2 and #3 at the Stratford Army engine plant but failed to conduct emissions tests on the boilers within the timeframes prescribed in Section 22a-174-22 of the RCSA and TA&O #8137A. Additionally, Ferguson & Williams, LLC operated the Stratford Army Engine Plant as a Title V Source without applying for a Title V Operating permit or submitting a timely registration to operate under the General Permit to Limit Potential to Emit in lieu of applying for a Title V Operating Permit.

Enclosed please find Consent Order 1924, which provides Ferguson & Williams, LLC the opportunity to resolve these violations, prior to and lieu of a civil action referral to either the Office of the Attorney General or the U.S. Environmental Protection Agency. The Consent Order seeks a penalty of \$19,169 for operating the facility in violation of the applicable regulations and TA&O #8137A. Additionally, the Consent Order requires the submission of an updated NOx RACT Compliance Plan and prohibits Ferguson & Williams, LLC from operating the facility in violation of the RCSA and TA&O #8137A. Many of these requirements were discussed during the May 15 meeting.

Please sign and return the enclosed Consent Order within seven (7) calendar days of your receipt of the Order.

Once the signed Consent Order is received by the Department, it will be presented to the Commissioner for signature. If signed by the Commissioner, Consent Order No. 1924 will become a final Order of the Commissioner and a certified copy of the Consent Order will be returned to you via registered mail.

If you have any questions regarding this letter, please do not hesitate to contact Seng Phouthakoun of my staff at 424-3702.

Sincerely,

Anne Gobin  
Chief  
Bureau of Air Management

7/7/08  
Date

W/Enclosure