



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



In the matter of)
The State of Connecticut and)
United States Army)
Stratford Army Engine Plant)
Trading Agreement
and Order No. 8137A

Whereas, the Commissioner of Environmental Protection ("Commissioner") and the United States Army Stratford Army Engine Plant ("USASAEP"), agree that it is in the public interest that they work cooperatively to improve the air quality within the State of Connecticut and that the use of discrete emissions reduction credit ("DERC") trading to reduce nitrogen oxide ("NOx") emissions will achieve this result in a timely and cost-effective manner:

A. At the request and with the agreement of USASAEP, the Commissioner finds the following:

- 1. This Trading Agreement and Order supercedes Trading Agreement and Order No. 8137 issued on November 19, 1996, Trading Agreement and Order No. 8137 Modification issued on July 8, 1997, and Trading Agreement and Order No. 8137 Modification No. 2 issued on April 29, 1999.
2. USASAEP is a Department of the United States government that operates the Stratford Army tank engine and turbine engine manufacturing facility at 550 Main Street in Stratford, Connecticut ("facility") under contract to the U.S. Army Tank-Automotive and Armaments Command.
3. At the facility, USASAEP operates fuel-burning equipment consisting of one (1) permitted steam boiler ("boiler 1") and two (2) registered steam boilers 2 and 3 ("boilers 2 and 3") capable of burning natural gas and No. 6 fuel oil, which are subject to the requirements of Section 22a-174-22 of the Regulations of Connecticut State Agencies ("Regulations") pertaining to the control of nitrogen oxides ("NOx").
4. U.S. Environmental Protection Agency ("EPA") Method 7 emission tests resulted in NOx emissions rates as follows:

Unit-Permit # P- Reg. # R-	Fuel	Mfg Heat Input MMBtu/hr	Actual Heat input during emissions testing	Emission Test Rate	Allowable Rate	FLERs	Date of Last Emission Test	Next Test Due
Boiler #1: P-0061	No. 6 oil	51	39.8	0.318	0.25	N/A	5/7/02	5/7/07
	Nat. Gas	51	45.2	0.046	0.20	N/A	5/7/02	5/7/07
Boiler #2: R-0116	No. 6 oil	75	35.7	0.382	0.25	0.41	4/11/01	4/11/06
	Nat. Gas	75	33.6	0.072	0.20	0.08	4/11/01	4/11/06
Boiler #3: R-0001	No. 6 oil	89	34	0.331	0.25	0.35	4/11/01	4/11/06
	Nat. Gas	89	42.7	0.088	0.20	0.10	4/11/01	4/11/06

5. When burning No. 6 fuel oil in boiler 1, USASAEP exceeds the NOx emissions limit specified in permit P-0061.
6. To reduce NOx emissions from boiler 1, USASAEP proposes to burn only natural gas.
7. When burning natural gas in boiler 3, USASAEP exceeded the full load emission rate ("FLER") specified in Trading Agreement and Order No. 8137 and as a result created 1.32 tons of invalid averaging credits.
8. On June 26, 2002, the Department issued Notice of Violation ("NOV") No. 14899, to USASAEP for exceeding the FLER limit specified in Trading Agreement and Order 8137.
9. In response to NOV No. 14899, USASAEP has permanently retired without use 1.32 tons of approved DERCs plus a 100% premium for a total of 2.64 tons in accordance with Trading Agreement and Order No. 8137.
10. Section 22a-174-22(k) of the Regulations requires that emissions testing to be conducted when the source is operating at or above 90 percent of its highest maximum operating capacity, unless allowed otherwise by the Commissioner in a permit or order.
11. As shown in Table 1, when conducting emissions testing, USASAEP operated boilers 1, 2 and 3 at less than the minimum 90 percent specified in Section 22a-174-22(k) of the Regulations.
12. On June 26, 2002, the Department issued NOV No. 14901, to USASAEP for operating boilers 1, 2 and 3 at less than the minimum 90 percent during testing.
13. In response to NOV No. 14901, USASAEP proposes to comply with Section 22a-174-22(k) by accepting an operating restriction for boilers 1, 2 and 3, which will reduce the maximum operating capacity heat input to a level that will equal 90 percent of the last Commissioner approved emissions testing level for each boiler and fuel as shown in Table 3 of this Trading Agreement and Order.

14. USASAEP agrees to comply with the requirements of Section 22a-174-22 of the Regulations by using discounts, FLERs, design margin and an emission limitation restriction (“cap”) for boilers 2 and 3 as specified in this Trading Agreement and Order.
15. The Commissioner, pursuant to Section 22a-174-22 of the Regulations, previously approved the NOx DERCs referenced in Table 2 of this Trading Agreement and Order. DERC creation serial numbers if assigned by the Department to these previously approved DERCs are provided in Table 2 of this Trading Agreement and Order. Unused DERCs are subject to the vintage restrictions of this Trading Agreement and Order. Dates after which the unused DERCs will no longer be eligible for use as a result of the vintage restrictions are provided in Table 2 of this Trading Agreement and Order in the expiration date column.

Table 2 USASAEP – Previously Approved DERCs					
Year	Ozone season	Tons	Non-ozone season	Tons	Expiration Date
Pre-2000	S/N not assigned	7	N/A	N/A	12/31/04
2001	CT01/8136A2(DC)NOx oz(1-2)	2	N/A	N/A	12/31/06

B. Whereas the Commissioner, in accordance with the provisions of this Trading Agreement and Order, pursuant to Section 22a-174-22(d)(3), (e) and (j) of the Regulations, hereby allows USASAEP to comply with Section 22a-174-22 of the Regulations through use of emissions averaging and DERC trading and applicable emission limitations at the facility as provided herein.

C. With the agreement of USASAEP, the Commissioner, acting under the Connecticut General Statutes Section 22a-6, 22a-171, 22a-174, 22a-176, and 22a-177, orders USASAEP as follows:

1. Upon issuance of this Trading agreement and Order, USASAEP shall cease burning No. 6 fuel oil in boiler 1 and only burn natural gas.
2. Upon issuance of this Trading Agreement and Order, at the facility, USASAEP shall comply with Section 22a-174-22 of the Regulations through emission reduction trading. Until USASAEP achieves permanent compliance with the emissions standard in Section 22a-174-22(e) of the Regulation or by April 30, 2007, whichever is earlier:
 - a. USASAEP shall certify in writing to the Commissioner of the DEP, that USASAEP has permanently retired without use 2.64 tons of DERCs in accordance with paragraph A.10 this Trading Agreement and Order;
 - b. USASAEP shall use approved DERCs as required under this Trading Agreement and Order;

- c. USASAEP shall have in its possession sufficient approved DERCs to meet applicable NOx emission limits as allowed under this Trading Agreement and Order;
- d. USASAEP shall comply during the operation of the boilers with the FLERs shown in Table 1 of this Trading Agreement and Order; and
- e. USASAEP shall restrict the operating capacity of boilers 1, 2 and 3 to the maximum operating levels as specified in Table 3 of this Trading Agreement and Order:

Table 3				
USASAEP – Stratford Army Engine Plant				
Maximum Operating Capacity Restrictions				
Boiler #	No. 6 fuel Oil Heat input MMBtu/hr	Steam Output Lbs/hr	Natural Gas Heat input MMBtu/hr	Steam Output Lbs/hr
Boiler 1	44.2	39,400	50.2	42,100
Boiler 2	39.7	30,000	37.3	28,900
Boiler 3	37.8	31,100	47.4	35,600

3. Averaging and DERC trading: Until April 30, 2007, before the first day of each month, USASAEP shall have in its possession sufficient approved DERCs for such month for boilers 2 and 3 based on the following calculation:

- a. Calculate Estimated Monthly Averaging Credits and Debits Estimate the monthly averaging credits generated when burning natural gas and monthly averaging debits when burning No. 6 fuel oil in boilers 2 and 3 during that month as follows:

- i. Estimated credits (tons) = [heat input in MMBtu x ((0.80 x allowable limit lbs/MMBtu) – FLER in lbs/MMBtu)] ÷ 2000 lbs/ton.

Where:

- Heat input = for the appropriate boiler and fuel as shown in Table 3.
- Allowable limit = allowable limit rate in lbs/MMBtu for the appropriate boiler shown in Table 1 of this Trading Agreement and Order.
- Full load emission rate = FLER for the appropriate boiler and fuel as shown in Table 1 of this Trading Agreement and Order.
- 0.80 = the 20% averaging credit discount.
- Fuel heating value = 1050 BTU per cubic feet of natural gas.

- ii. Estimated debits (tons) = $[\text{heat input in MMBtu} \times ((0.85 \times \text{allowable limit lbs/MMBtu}) - \text{FLER in lbs/MMBtu})] \div 2000$ lbs/ton.

Where:

- Heat input = for the appropriate boiler and fuel as shown in Table 3.
- Allowable limit = allowable limit rate in lbs/MMBtu for the appropriate boiler shown in Table 1 of this Trading Agreement and Order.
- Full load emission rate = FLER for the appropriate boiler and fuel as shown in Table 1 of this Trading Agreement and Order.
- 0.85 = the 10% averaging debit discount and 5% design margin.
- Fuel heating value = 142,000 BTU per gallon for No. 6 fuel oil.

- iii. Calculate and have on hand at the beginning of each month the sufficient approved DERCs for each calendar month as follows:

Estimated net debits = the sum of the total estimated debits (negative number) plus the total estimated credits (positive number).

- iv. The minimum quantity of DERCs required to be on hand for such month shall equal to the calculated net negative debits.

- b. Calculate Monthly Actual Averaging Credits and Debits Calculate the actual monthly averaging credits generated when burning natural gas and the actual monthly debits when burning No. 6 fuel oil in boilers 2 and 3 during that month as follows:

- i. By the tenth day of the of the following month calculate the sum of the actual debits and credits created during that previous month as follows:

Actual credits (tons) = $[\text{heat input in MMBtu} \times ((0.80 \times \text{allowable limit lbs/MMBtu}) - \text{FLER in lbs/MMBtu})] \div 2000$ lbs/ton.

Actual debits (tons) = $[\text{heat input in MMBtu} \times ((0.85 \times \text{allowable limit lbs/MMBtu}) - \text{FLER in lbs/MMBtu})] \div 2000$ lbs/ton.

- ii. Calculate the actual net debits required for each calendar month as follows:

Actual net debits (tons) = the sum of the total actual debits (negative number) plus the total actual credits (positive number).

- iii. The quantity of DERCs required to be permanently retired for such month shall equal the calculated net negative debits. No approved DERCs will be required for emissions in any month during which there are more credits than debits. Net positive credits may not be carried forward to the next month.

4. Unit operating Restrictions and Annual Emissions Cap.

- a. US EPA Trading Program Guidelines require that an emission restriction ("Cap") shall be used to prevent exceeding the lower of historical actual or allowable emission limits ("1990 historic levels"). USASAEP's total NOx emissions from boiler 2 and 3 shall not exceed an emissions cap of 12.6 tons per year.
 - b. If the cap is exceeded, approved DERCs may be used to offset emissions above the cap; however, said DERCs shall be separated from DERCs and/or averaging credits used for meeting allowable emission limits specified in Table 1 of this Trading Agreement and Order. The quantity of DERCs required to offset excess emissions above the cap shall equal the difference between the total emissions (in tons) and the cap (in tons), plus a 100% premium equal to the difference in DERCs for exceeding the cap.
 - c. For purposes of calculating total emissions, only emissions from boilers 2 and 3 shall be included; emissions used shall be for a calendar year, based on most recent official emissions test results. Approved DERCs shall be in USASAEP's possession before the historic level is exceeded.
 - d. To determine if the total annual emissions are approaching or exceeding the annual cap, USASAEP shall calculate the total annual emissions by allocating the fuel heat input use from each boiler times the appropriate emissions factors for the fuels used and summing the results. USASAEP shall calculate the annual emissions by adding the most recent monthly total for boilers 2 and 3 to the previous 11 months total and compare the result with the cap. USASAEP shall notify the Department in writing within 30 days of exceeding the cap.
5. If at any time the period while this Trading Agreement and Order remains in effect, USASAEP exceeds this new maximum operating limit stated in paragraph C.2.e., USASAEP shall conduct NOx emissions testing of that subject boiler on or before

sixty (60) days after the exceedance of the above limits in accordance with the following:

- a. USASAEP shall submit to the Commissioner for his review and written approval an Intent-To-Test ("ITT") protocol not less than thirty (30) days prior to the emissions testing required pursuant to paragraph C.5., of this Trading Agreement and Order. The ITT protocol shall include at least:
 - i) The Department of Environmental Protection's Bureau of Air Management Test Form No. 1, "Intent to Test";
 - ii) System operating parameters indicative of the highest operating rate since the last Commissioner approved stack test, including, but not limited to: steam output rate, temperature and pressure, fuel firing rate, and NOx emissions rate.
 - iii) The ITT protocol shall provide that USASAEP shall perform testing as specified in Sections 22a-174-5 and 22a-174-22 of the Regulations, including operating the subject boiler at not less than ninety percent (90%) of its maximum rated capacity limit as specified in Table 3 of this Trading Agreement and Order or highest operating rate since its last/previous emissions test, whichever is higher.
 - iv) USASAEP shall perform all testing required by paragraph C.5. in accordance with the approved ITT protocol.
 - v) In conducting and performing the testing required by paragraph C.5, and in analyzing the results of such testing, USASAEP shall adhere to methods specified in Sections 22a-174-5 and 22a-174-22 of the Regulations and as approved by the EPA and the Commissioner.
 - vi) USASAEP shall schedule all emissions testing so as to allow the Commissioner to be present during such testing and to independently verify facility operations, air pollution control equipment parameters, and testing procedures.
 - vii) Within thirty (30) days after completing any emissions testing required by this Trading Agreement and Order, USASAEP shall submit to the Commissioner a written report providing the results of such testing; within 15 days of a notice from the Commissioner indicating any deficiencies in such report, USASAEP shall submit a revised report.
6. USASAEP shall make and keep records of: daily fuel use and fuel type; excess NOx emissions; the number of DERCs in its possession, created, purchased and used (by serial number if assigned) each month in accordance with the

appropriate emission rates and limits in this Trading Agreement and Order; the number of DERCs used during the ozone season and non-ozone season (the remainder of the year); as well as documentation attesting to the fact that approved DERCs used during the ozone season were generated during the ozone season. Generator certification of this fact shall be sufficient.

7. **Record Keeping.** USASAEP shall retain records and supporting documentation as described in this Trading Agreement and Order for a minimum of five years, commencing on the date such records were created. USASAEP shall provide the records specified above to the Commissioner within thirty (30) days of receipt of a written request from the Commissioner.
8. **Annual Emission Statement.** No later than March 1, of every year after issuance of this Trading Agreement and Order, USASAEP shall include with the Annual Emission Statement provided 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. USASAEP shall also include NOx emissions from each boiler using or generating DERCs, and the amount of all DERCs used including serial number (if assigned) and approved DERCs generated and/or purchased from other facilities), generated and/or approved for the previous calendar year. These reports shall be on a form prescribed by the Commissioner and shall be in monthly increments. **Should USASAEP choose to discontinue the generation of DERCs, USASAEP will notify the Commissioner upon discontinuance.** modified daily after the consent of the Commissioner by written modification of this Trading Agreement and Order
9. **Allowance Use.** Pursuant to Section 22a-174-22(d)(3) of the Regulations, USASAEP may use NOx allowances, through April 30, 2007, pursuant to Section 22a-174-22 (j) of the Regulations to achieve all or a portion of the reductions required by Section 22a-174-22 of the Regulations. Any allowance used for compliance with Section 22a-174-22(e) of the Regulations shall be subject to all restrictions and/or requirements applicable to DERCs contained in this Trading Agreement and Order;
 - a. In order for USASAEP to use NOx allowances, USASAEP shall create a general account in EPA's NOx Allowance Tracking System ("NATS"); and
 - b. Each allowance used for compliance with Section 22a-174-22 of the Regulations shall be equivalent to one discrete emission reduction credit. Allowances shall be considered used for compliance with Section 22a-174-22 of the Regulations when they are transferred from the facility's NOx general account in the NATS to the CT State NOx Retirement Account (Account ID CT0000000300 in the NATS).
10. **DERC Doubling.** At a minimum, DERCs required shall be adjusted upwards by 100% if DERCs are not in USASAEP's possession prior to the first day of each

month for use. However, based on the gravity of noncompliance, the Commissioner may require additional upward adjustment.

11. **Vintage Restriction.** For the purposes of compliance with Section 22a-174-22 of the Regulations, DERCs/allowances shall only remain valid for five (5) calendar years from the year of the generation/allocation of such DERCs/allowances. DERCs/allowances older than five (5) calendar years from their creation/allocation are not valid for use for compliance with Section 22a-174-22 of the Regulations. Notwithstanding the above, DERCs/allowances generated/allocated prior to calendar year 2000 are valid for use for compliance with Section 22a-174-22 of the Regulations up to and including December 31, 2004.
12. **FLER Exceedance.** Noncompliance with an established FLER shall subject USASAEP to make restitution by matching the quantity of emissions ("true up") caused by the exceedance plus a 100% premium. The true up in tons of DERCs shall be equal to the FLER exceedance in lbs/MMBtu, multiplied by the total heat input during the period of noncompliance divided by 2000 lbs/ton. If the period of noncompliance is not known, the time period from the completion of the last/previous Department witnessed emission test through the date the FLER compliance is achieved as approved by the Commissioner shall be used. 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.
13. **FLER Modification.** FLERs set forth in Table 1 of this Trading Agreement and Order may be modified only after the consent of the Commissioner by written approval or modification of this Trading Agreement and Order.
14. **Emissions Testing.** Pursuant to Section 22a-174-22(k) of the Regulations, USASAEP shall conduct NOx emission tests of the boilers 1, 2 and 3 at least once every five years commencing from the dates of the NOx emission tests for the boilers 1, 2 and 3 as provided in Table 1 of this Trading Agreement and Order, unless otherwise required for boilers 2 and 3 by paragraph C.5. of this Trading Agreement and Order. Notwithstanding the above, USASAEP shall not be required to test boiler 1 pursuant to Section 22a-174-22(k) of the Regulations, if USASAEP is in compliance with paragraph C.1 of this Trading Agreement and Order.
15. **Extension.** No later than April 30, 2007 for the boilers 2 and 3, USASAEP shall comply with the requirements in Section 22a-174-22(d)(1) of the Regulations. However, after full program review of this and other Trading Agreements and Orders and if determined to be appropriate, the Commissioner may grant written extension of this Trading Agreement and Order.
16. **Future Compliance Report.** On or before September 1, 2006, USASAEP shall submit a report indicating how the facility will comply with Section 22a-174-22 of the Regulations after April 30, 2007.
17. **Full compliance.** USASAEP shall not be considered in full compliance with this Trading Agreement and Order until all actions required by this Trading Agreement and Order have been completed as approved and to the Commissioner's satisfaction.

18. Approvals. USASAEP shall use best efforts to submit to the Commissioner all documents required by this Trading Agreement and Order in a complete and approvable form. If the Commissioner notifies USASAEP that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and USASAEP shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within 30 days of the Commissioner's notice of deficiencies. In approving any document or other action under this Trading Agreement and Order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this Trading Agreement and Order. Nothing in this paragraph shall excuse noncompliance or delay.
19. Definitions. As used in this Trading Agreement and Order, "Commissioner" means the Commissioner or a representative of the Commissioner. "Ozone season" means the period from May 1 through September 30 in any given calendar year. 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. Approved DERCs are defined for purposes of this Trading Agreement and Order as those for which the Commissioner has provided written authorization for use in compliance with Section 22a-174-22 of the Regulations.
20. Dates. 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.
21. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this Trading Agreement and Order shall be signed by USASAEP or, if USASAEP is not an individual, by an individual who is an authorized representative of USASAEP, in accordance with Section 22a-174-2a(a) of the Regulations of Connecticut State Agencies, and by the individual(s) responsible for actually preparing such document, and each such individual 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, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that 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 is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."

22. Noncompliance. This Trading Agreement and Order is a final order of the Commissioner with respect to the matters addressed herein, and is nonappealable and immediately enforceable. Failure to comply with this Trading Agreement and Order may subject USASAEP to an injunction and penalties.
23. False statements. Any false statement in any information submitted pursuant to this Trading Agreement and Order is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.
24. Notice of transfer; liability of USASAEP. Until USASAEP has fully complied with this Trading Agreement and Order, USASAEP shall notify the Commissioner in writing no later than 15 days after transferring all or any portion of the facility, the operations, the site or the business which is the subject of this Trading Agreement and Order or after obtaining a new mailing or location address. USASAEP's obligations under this Trading Agreement and Order shall not be affected by the passage of title to any property to any other person or municipality.
25. Commissioner's powers. Nothing in this Trading Agreement and 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 past, present, or future violations of law. If at any time the Commissioner determines that the actions taken by USASAEP pursuant to this Trading Agreement and Order have not successfully corrected all violations, fully characterized the extent or degree of any pollution, or successfully abated or prevented pollution, the Commissioner may institute any proceeding to require USASAEP to undertake further investigation or further action to prevent or abate violations or pollution.
26. USASAEP's obligations under law. Nothing in this Trading Agreement and Order shall relieve USASAEP of other obligations under applicable federal, state and local law.
27. No assurance by Commissioner. No provision of this Trading Agreement and Order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by USASAEP pursuant to this Trading Agreement and Order will result in compliance or prevent or abate pollution.
28. Access to facility. Any representative of the Department of Environmental Protection may enter the facility without prior notice for the purposes of monitoring and enforcing the actions required or allowed by this Trading Agreement and Order.
29. No effect on rights of other persons. This Trading Agreement and Order neither creates nor affects any rights of persons or municipalities that are not parties to this Trading Agreement and Order.
30. No Creation of Property Rights. This Trading Agreement and Order does not create any property rights with respect to these DERCs.
31. Notice to Commissioner of changes. Within fifteen (15) days of the date USASAEP becomes aware of a change in any information submitted to the Commissioner under

this Trading Agreement and Order, or that any such information was inaccurate or misleading or that any relevant information was omitted, USASAEP shall submit the correct or omitted information to the Commissioner.

32. Notification of noncompliance. In the event that USASAEP 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 Agreement and Order or of any document required hereunder, USASAEP shall immediately notify by telephone the individual identified in the next paragraph 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. Within five (5) days of the initial notice, USASAEP shall submit in writing the date, time, and duration of the noncompliance and 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 USASAEP shall comply with any dates which may be approved in writing by the Commissioner. Notification by USASAEP 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.
33. Submission of documents. Any document required to be submitted to the Commissioner under this Trading Agreement and Order shall, unless otherwise specified in this Trading Agreement and Order or in writing by the Commissioner, be directed to:

Mr. Roland L. Severance Jr., PE
Department of Environmental Protection
Bureau of Air Management
Compliance and Field Operations Division
Emissions and Credit Trading Section
79 Elm Street, 5th Floor
Hartford, Connecticut 06106

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

United States Army Stratford Army Engine Plant

Signature: 

Name: PETER W. SZYMANSKI

Title: INSTALLATION MANAGER

Date: 30 Apr 03

Issued as a final order of the Commissioner of Environmental Protection

on _____, 2003.

Arthur J. Rocque, Jr.
Commissioner

CITY OF STRATFORD LAND RECORDS

MAILED CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Certified Document No.