Table 1. Potential Timeline for Naugatuck Incineration Compliance Upgrades

	Timeline	Action Item
	T = 0	March 20, 2013
5-19-13	**T+60 Days**	**The Borough issues formal Notice-To-Proceed to Veolia and/or to selected firms to perform stack testing and/or preliminary engineering.**
6-18-13	T+90 Days	The Borough retains a Title V/Air Permitting consultant. The consultant prepares and submits stack test protocols with required 45-day advance notice to CTDEEP.
8-17-13	T+150 Days	MACT Assessment stack testing is performed to test compliance hypotheses and technology selections. Report may be available 30 days thereafter.
9-16-13	T+180 Days	MACT Assessment stack testing is performed again (with 45-day notice to CTDEEP) to test updated compliance hypotheses and technology selections. Report may be available 30 days thereafter.
10-16-13	T+210 Days	The Title V/Air Permitting consultant begins finalizing the Title V Application submittal in conjunction with the emission system's design engineers based upon the stack testing results.
12-15-13	T+270 Days	The consultant submits the draft Title V permit application for Borough and Veolia review.
1-14-14	T+300 Days	Both parties return comments within 30 days for the consultant to make final revisions to the application.
2-13-14	**T+330 Days**	**Submit Title V Permit App to CTDEEP for review (90-day requirement as WPCA was informed by SEA Kleinfelter's Bill Hardy at Feb 21 WPCA meeting)**
5-14-14	**T+420 Days**	**The Borough formally submits a Title V Application to CTDEEP & EPA (deadline May 20, 2014)**
11-10-14	T+600 Days	Purchase Orders are issued and confirmed with vendors for all required/specialized new equipment due to extreme lead times being experienced as facilities across U.S. are all doing the same upgrades.
1-9-15	T+660 Days	The Borough's implementation contractor completes the capital improvement design/implementation plan.
8-7-15	T+870 Days	Construction period begins
1-4-16	T+1020 Days	The incinerator upgrades are completed and started up. Intent to Test application is prepared/submitted to CTDEEP (45 days before testing)
3-4-16	T+1080 Days	MACT Assessment stack testing is performed again to test upgraded incinerator for compliance.
3-4-16	T+1080 Days	The MACT-compliant furnace is in operation.
5-3-16	**T+1140 Days**	**The furnace must be in MACT compliance (deadline May 20, 2016).**