

**L.S.J., LLC**  
**6100 Red Hook Quarter B3**  
**St. Thomas, Virgin Islands**  
**00802**

December 30, 2017

Mr. Norman Williams  
Director of Environmental Protection  
45 Mars Hill  
Frederiksted, St. Croix, VI  
00840

Re: L.S.J., LLC Air Pollution Control

Dear Mr. Williams:

In connection with the application for renewal (the "Application") of Air Pollution Permits STT-8-020-L-14 and STT-8-020-M-14 issued on February 7, 2014 with respect to the two standby generators referred to therein (the "Permits"), and in accordance with the telephonic advice received from Ms. LaToya Williams last week, L.S.J., LLC (the "Applicant") respectfully submits herewith additional information relating to the extended operation of standby generators no. 1 and no. 2.

As a preliminary matter, we understand, based on Ms. Cecile de Jongh's telephone conversation with Ms. Latoya Williams last week that the annual usage limit of 500 hours imposed under paragraph B.7 of each of the Permits does not apply to generators manufactured after 2007. Inasmuch as the standby generators referred to in the Permits were both manufactured in 2009, it appears that the 500 hours limit is inapplicable to the standby generators referred to in the Permits, may have been applied to them in error and should be removed from any further renewals granted for those standby generators. In an abundance of caution, however, and in accordance with your instructions, we are

providing this supplement regarding the use of standby generators no. 1 and 2 in 2017 in excess of the 500 hours limit.

Since the onset of Hurricane Irma, and, subsequently Hurricane Maria, Little St. James has been cut off from its primary source of electricity from WAPA. The power outage has continued through the date of this letter, leaving Little St. James Island without any source of power other than through the operation of its standby generators. As a result, it has been and continues to be necessary to operate Little St. James' standby generators full time in order to sustain this island residence, which is the primary residence of its owner.

As indicated in the operational logs and the schedule of total hours of operation submitted with the Application, prior to the arrival of Hurricane Irma, each of the standby generators had been operated well below the 500 hours per year authorized under the Permits in each of 2015 and 2016. Until the onset of Hurricane Irma, both standby generators no. 1 and no. 2 were within the annual 500 hours operational limit in 2017. Through the end of August 2017, standby generator no. 1 was operated a total of 111 hours and standby generator no. 2 was operated a total of 24.2 hours. However, after the hurricanes hit, they have been operating in rotation on a full-time basis, and as a result, have exceeded the 500 hours authorized for 2017. Nevertheless, it is our understanding that because of the continuous power outage caused by Hurricanes Irma and Maria and the declaration of the Virgin Islands as a disaster area, the 500-hour operational limits will not apply until power from WAPA is restored to Little St. James.

Respectfully,

Danny Vicars

Engineering Supervisor