

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 generator 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 generator no. 2 in excess of the

500 hour limit due to the complete loss of power on Little St. James caused by Hurricane Maria, which has continued from September 6 through the date of this letter.

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 standby generator no. 2 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. Standby generator no. 1 was operated a total of 111 hours and standby generator no. 2 was operated a total of 24.2 through the end of August, 2017.

Until the onset of Hurricane Irma, both generator 1 and 2 were within the annual 500-hour operational limit set forth in the Permits. 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. It is our understanding, however, 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 operational limits on standby generator no. 2 will not apply until power from WAPA is restored to Little St. James.

The Applicant has continued to make the required log entries through the date of this letter for the duration of this period of extended usage.

Sincerely,

Danny Vicars

Assistant Engineer