

Mr. Maxwell George, Jr.
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Subject:

**Proposal for Conducting Stack Testing at the St. Croix Richmond
Generating Station - Civil Action Number 2013-CV-00028 and DOJ Case
Number 90-5-2-10441**

AIR SERVICES

Dear Mr. George:

Date:
December 2, 2021

As you are well aware VIWAPA been operating under the above referenced Consent Decree for the last eight years. All of the obligations under the CD have been met except for the requirement of a final round of stack testing. In 2017 SAS initiated testing that had to be delayed and stopped because of the two Category 5 hurricanes that came through the area. In 2019 Arcadis initiated stack testing for a number of units and we too were delayed because of the Covid pandemic.

Contact:
Michael E. Lukey, P.E.

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This proposed effort is directed to test those units (turbines and Jenbacher RICE units) which were not previously tested at the Richmond Station or could not be completed because of the hurricanes, pandemic and the availability of units due to lack of fuel oil. This proposal is for new work and in no way overlaps any of the prior testing needed at the facility. However, the testing is required and will be used to satisfy the requirements of the Consent Decree referenced above.

Our ref:
Air Compliance Assistance

The testing will be completed following the EPA approved protocols in both 2011 and 2016, i.e., the standard EPA methods for addressing the concentrations and mass emissions of each pollutant. Testing will be conducted on fuel oil and propane at multiple load conditions. Much of the 2017 testing had to be redone since 4 year old partially completed test results were never presented to EPA.

The cost estimate for this effort includes the mobilization of both equipment and personnel to the test site. Approximately 4 or 5 individuals would complete the tests over a period of several weeks. Once completed the samples will be sent to an EPA approved laboratory for analysis. Subsequently, a stack test report will be completed and sent to VIWAPA.

Arcadis has been conducting stack testing at both plants for over 10 years. We have a great deal of experience in this technical arena and, of course, are well experienced with the emission units at VIWAPA. The firm has been doing stack testing for nearly 50

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years and has a good repour with the federal and state regulatory agencies for providing accurate and timely results.

Our proposed cost for this effort is **\$130,000**. We will adhere to the terms and conditions of our other contracts with VIWAPA. The costs will be incurred on a time and expense basis in accordance with the terms and conditions agreed to by the existing VIWAPA contract and Arcadis in the Master Service Agreement contract as amended, Contract SC-52-19. We are proposing use of our standard fee of 15 percent fee for charges for equipment and expenses incurred. ARCADIS maintains business licenses in the Virgin Islands.

If there are any questions on our proposal, please contact the undersigned. We look forward to continuing to provide environmental consulting services to VIWAPA.

Sincerely,

Arcadis U.S., Inc.

A handwritten signature in blue ink, appearing to read "Michael E. Lukey".

Michael E. Lukey, P.E.
Senior Air Pollution Control Engineer

cc: Brian.Kaufman@arcadis.com
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