



Jamaica Energy Partners

RKA Building, 3rd Floor, 10 Grenada Way, Kingston 5, Jamaica, W.I. Tel: (876) 920-1746-9 Fax: (876) 920-1750

April 30, 2010

Mr. Peter Knight
Chief Executive Officer
National Environment & Planning Agency
10 Caledonia Avenue
Kingston 5

Dear Mr. Knight,

**RE: APPLICATION FOR PERMIT TO CONSTRUCT AND OPERATE
THE WEST KINGSTON POWER PLANT - PERMIT #: 2009-01017-EP00076**

Jamaica Energy Partners (JEP) is in receipt of the above-named permit. However, the following amendments to the permit are being requested based on some changes/developments that have taken place:

- Pursuant to discussions with Jamaica Public Service Company Limited (JPSCo.) a dedicated Transmission line from the site to Hunts Bay Power Station is now required. JEP is therefore requesting that the last two sentences in the second paragraph under "Description of Permitted Activity" on page 2 of the permit be corrected to read: "The facility will interconnect with the JPSCo transmission grid by means of a dedicated transmission line from the site to the Hunts Bay Power Station. A substation will be built at the new site and the referenced transmission line used to interconnect this substation to the JPSCo Hunts Bay Substation";
- Based on the results of the Air dispersion model comparison study and ambient air quality monitoring conducted in the vicinity of the proposed site (see attached), the fuel that will be used is 2% w/w sulphur # 6 heavy fuel oil. The study also demonstrated that Selective Catalytic Reducers (SCRs) would not be needed in order to meet the ambient air quality standards. We are therefore requesting that amendments be made to the permit to reflect these changes. The "0.5%" in the first sentence of the third paragraph under "Description of Permitted Activity" on page 2 of the permit should therefore be corrected to 2% and the second sentence in the said paragraph should be removed. Attached is our letter to the National Environment and Planning Agency (NEPA) dated May 26, 2009 and the accompanying Air Dispersion Model Validation Plan. Also attached is the Model comparison study and pages 216 - 217 and 260 - 261 in the Environmental Impact Assessment (EIA);

- Request for name change: We are requesting that the permittee be changed from Jamaica Energy Partners (JEP) to West Kingston Power Partners (WKPP) which was recently incorporated. The Power Purchase Agreement (PPA) and Supply of Electricity Licence, 2010, approved by JEP and the Ministry of Energy of Mining (MEM) respectively were duly assigned to WKPP. Both organizations (JEP and WKPP) have common owners;
- The first sentence in the fourth paragraph under "Description of Permitted Activity" on page 2 of the permit should be corrected to read: "The Diesel engines will use radiators for primary heat exchange";
- Specific conditions 4 and 5 indicate that licence to discharge trade effluent is required for the Oily water and Reverse Osmosis (RO) treatment units. However, we are requesting that this be removed from the permit since the effluent will be discharged directly to the National Water Commission (NWC) sewer line;
- JEP is also considering hiring a contractor to construct a well from which to extract water (upon receiving approval from the Water Resources Authority [WRA] etc.). It is therefore being requested that the first sentence in the last paragraph under "Description of Permitted Activity" on page 2 of the permit be corrected to read: "...to treat water from a well and/or the NWC potable water connection";
- JEP is requesting that specific condition 7 be altered or removed since it would be necessary for persons to work on the premises before and during the demolition and construction work which is also required to facilitate the installation of sanitary facilities and the connection to the NWC sewage system. JEP will make provisions as needed in the form of disposable toilets, etc. until site preparation is at the stage where a connection can be made to the NWC sewage system;
- We are requesting that corrections be made to Specific condition 10 since we will not be laying "transmission pipelines";
- JEP is requesting that changes be made to the permit to reflect the fact that this is a 66 MW project since the Office of Utilities Regulation recently granted JEP permission to increase the power to be supplied by this project. This will not result in any changes to the equipment, infrastructure etc. to be used for this project and the potential impacts as was represented in the EIA (please see attached Air Dispersion model comparison report);
- Specific condition 15 indicated that stack emissions testing should be conducted for SO₂. We are requesting that SO₂ be removed from the list since SO₂ in the emissions is directly proportional to the sulphur content of the fuel and we will be monitoring the sulphur content of each batch of fuel used at the facility;

Mr. Peter Knight
April 30, 2010
Page 3

- We are requesting that Specific condition 16 be amended since detailed Operation and maintenance plans will be prepared by Wartsila and will not be available before the completion/commissioning of the Plant. It is therefore impossible to provide these plans within eight (8) weeks of receiving the permit;
- At least three (3) months is being requested for the completion of the plans mentioned in specific conditions 17 and 20.

Please provide a copy of the letter mentioned in specific condition 12 (dated May 20, 2009) as a copy of this letter was not sent with the permit.

The following should also be noted concerning the EIA:

- Wherever "World Bank"/"World Bank guidelines" is mentioned in the EIA it is referring to the International Finance Corporation (IFC)/IFC Thermal power guidelines (2008). IFC is a member of the World Bank Group;
- Based on the Geotechnical investigations conducted by Jentech Consultant Ltd. (see references on pages 41, 68 & 335 of the EIA), extensive pile foundations has been included in the Plant design to prevent subsidence;
- The reject water from the RO Unit will be discharged to the NWC sewer line and pumped to their central wastewater treatment facility for treatment and final disposal. As mentioned in the EIA, this will also be done for sewage and treated effluent from the Oily Water Treatment Unit. Details will be included in the relevant applications specified in the Environmental Permit for the construction and operation of the power plant.

Thank you for your kind cooperation and assistance in this matter.

Yours sincerely,
JAMAICA ENERGY PARTNERS


Wayne McKenzie
General Manager

copy Wilfred Bassaragh – Jamaica Energy Partners
Cecil Gordon – Jamaica Energy Partners
Lloyd Peak – Jamaica Energy Partners
Carlton Campbell – CL Environmental