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November 8, 2016

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DIV. OF OIL, GAS & MINING

Mr. Daron Haddock, Coal Program Manager  
Utah Division of Oil, Gas & Mining Coal Program  
P.O. Box 145801  
Salt Lake City, Utah 84114-5801

Dear Mr. Haddock:

Subject: Intermountain Power Agency - Permit Change for Chapter 1  
Wildcat Loadout Facility, C/007/0033

Intermountain Power Agency is submitting a revision to Chapter to 1 of our permit to alter the inspection schedule of the wind-blown fines. This is to reflect that the Wildcat Loadout is idle.

Enclosed are the C1 and C2 forms and two clean copies of the changes prepared for incorporation.

If you have any comments or questions, please contact me at (213) 367-4347.

Sincerely,



Aaron Perlman  
Mechanical Engineering Associate  
Intermountain Power Project

AP:ln  
Enclosure

c: Mr. R. Dan Eldridge, IPA  
Mr. Bradford L. Packer  
Mr. William W. Engels  
Mr. John L. Aguilar



The segment of road to be graveled is shown on Plate 1A. Once the graveled road is in operation, it will be watered as needed in the future to control fugitive dust emissions.

**7) Conduct future monitoring of wind-blown fines:** After the cleanup is completed and the construction is finished, the company will continue with an operational monitoring plan for the area. This will consist of an inspection of the area to assess the amounts of future coal-fines accumulation, augmented by digital photography. Following two consecutive months of no coal transloading, the inspections shall be annual. Following two consecutive months of transloading at least 10,000 tons of coal, inspections shall be quarterly. Monitoring results are included in the annual report. The general approach of monitoring (depth assessment and location on a map) will be stated in the annual report. Refer to Document "Wildcat Coal Fines Issue - Division Order-04 Wind Blown Fines) Annual Monitoring", dated November 29, 2012. This detailed study will be performed in the 2nd Quarter of each year.

**8) Bonding:** At present (July, 2010) the Wildcat reclamation bond is posted in the amount of \$1,144,000. This bond was re-adjusted in December 2007. Under the DO-04 cleanup plan there will be no additional demolition cost during final reclamation. The earthwork regrading costs will cancel out because Pond B is being replaced by Pond G. There will be slightly higher topsoiling costs and re-vegetation costs due to the additional disturbed acreage associated the cleanup plan. The existing disturbed area is 66.91 acres; the estimated disturbed area after implementation of the plan will be 73.26 acres, or an increase of 6.35 acres. Using the presently approved reclamation costs, the additional costs are computed as follows:

1) Topsoil:  $\$15,013/66.91 \text{ ac} = \$224/\text{acre}$   
 $\$224/\text{acre} \times 6.35 \text{ acres} = \$1422$

2) Reveg:  $\$359,746/66.91 \text{ ac} = \$5377/\text{acre}$   
 $\$5377/\text{acre} \times 6.35 \text{ acres} = \$34,141$

Total reclamation cost increase =  $\$1422 + \$34,141 = \$35,563$

Percent increase  $(\$1,144,000 + \$34,141)/\$1,144,000 = 1.028$

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