



---

**west virginia department of environmental protection**

---

Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: (304) 926-0475 • Fax: (304) 926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

**ENGINEERING EVALUATION / FACT SHEET**

**BACKGROUND INFORMATION**

Application No.: G10-D158  
Plant ID No.: 045-00146  
Applicant: Ramaco Resources, LLC  
Facility Name: Elk Creek Processing Plant  
Location: Verner, McDowell County, WV  
SIC Code: 1222 (Bituminous Coal & Lignite - Underground)  
NAICS Code: 212112 (Bituminous Coal Underground Mining)  
Application Type: Construction  
Received Date: November 26, 2014  
Engineer Assigned: Dan Roberts  
Fee Amount: \$1,500  
Date Received: December 1, 2014  
Applicant's Ad Date: December 4, 2014  
Newspaper: *Logan Banner*  
Complete Date: July 31, 2015  
UTM Coordinates: Easting: 426.94      Northing: 4170.93 km      NAD83 Zone 17N  
Lat/Lon Coordinates: Latitude: 37.682666      Longitude: -81.828579      NAD83  
Description: Application to construct an 800 TPH and 4,285,715 TPY wet wash coal preparation plant and railcar loadout.

**BACKGROUND**

Ramaco Resources, LLC owns the property where the proposed wet wash coal preparation plant is to be located. The proposed Elk Creek Processing Plant will lie within the footprint of WVDEP Article 3 Permit P059000.

**DESCRIPTION OF PROCESS** (taken directly from the application)

4,761,906 tons of raw coal will be transported annually by truck along haulroad (OT-1) to

**Promoting a healthy environment.**

one of two truck dump bins BS-1 or BS-2 at transfer points TP-1 or TP-2. The raw coal from truck dump bin #1 (BS-1) will be moved through transfer point TP-3 onto conveyor belt BC-1. Conveyor belt BC-1 will move the raw coal through transfer point TP-5 to Silo#1 (BS-3). The raw coal from truck dump bin #2 (BS-2) will be moved through transfer point TP-4 onto conveyor belt BC-2. Conveyor belt BC-2 will move the raw coal through transfer point TP-6 to Silo#2 (BS-4) or onto conveyor belt BC-2.1 which will move the raw coal through transfer point TP-7 into Silo #3 (BS-5). Conveyor Belt 2 can also move raw coal through transfer point TP-8 to raw coal stockpile OS-1. The raw coal from open stockpile OS-1 will move through transfer point TP-9 onto conveyor belt BC-3 to transfer point TP-10 onto conveyor belt BC-4.

The raw coal from Silo #1 (BS-3) will move through transfer point TP-11 onto belt conveyor BC-4. The raw coal from Silo #2 (BS-4) will move through transfer point TP-12 onto belt conveyor BC-4. The raw coal from Silo #3 (BS-5) will move through transfer point TP-13 onto belt conveyor BC-4. The raw coal will be moved by conveyor belt BC-4 through transfer point TP-14 to Double Deck Screen DD-1.

The raw coal will be screened at DD-1. The +4" material will be deposited on conveyor belt BC-5 at transfer point TP-15. Of the remaining -4" material, approximately 25% will be run through crusher RB-1 at transfer point TP-16 and then onto conveyor belt BC-6 at transfer point TP-17. The remaining -4" material will bypass crusher RB-1 and go straight to conveyor belt BC-6 at transfer point TP-17. Conveyor belt BC-6 will take the screened coal into the preparation plant at transfer point TP-20. The conveyor belt BC-5 will move the +4" material through transfer point TP-18 to be deposited either onto conveyor belt BC-8 or into a scalped rock and emergency refuse bin BS-6.

The scalped rock / emergency refuse bin BS-6 will only be used during times of emergency or if the refuse belts are down. At all other times, the refuse will be transported by a series of conveyor belts BC-7 through BC-11 to the impoundment. During times of emergency, scalped rock and/or refuse from the scalped rock/emergency refuse bin BS-6 will be loaded into trucks at transfer point TP-19. The trucks will travel by haulroad (OT-2) to the permitted refuse disposal area for final placement. No tonnage has been shown in the calculations for haulroad OT-2 since it would be used in an emergency situation for a limited time.

Of the proposed 3,214,285 tons per year of plant reject, approximately 1,071,428 tons per year will consist of slurry that will be pumped to the impoundment and the remaining 2,142,857 tons per year will be transported via conveyor belts.

Refuse from the preparation plant will be moved to conveyor belt BC-7 at transfer point TP-21 and then through a series of belt transfer points to the refuse bin. The transfers and conveyors in this series will include: TP-22, BC-8, TP-23BC-9, TP-24, BC-10, TP-25 and conclude with BC-11. From conveyor belt BC-11, refuse will move through transfer point TP-26 to refuse bin BS-7 and into a truck via transfer point TP-27.

Back at the preparation plant, clean coal will be moved through transfer point TP-28 onto conveyor belt BC-12. Conveyor belt BC-12 will move the clean coal to conveyor belt BC-13 at transfer point TP-29. Conveyor belt BC-13 will move the clean coal to transfer point TP-30 where

it will be deposited into Clean Coal Stockpile #1 (OS-2) or continue onto conveyor belt BC-14. Conveyor belt BC-14 will move the clean coal to transfer point TP-31 where it will either be deposited into Clean Coal Stockpile #2 (OS-3) or continue onto conveyor belt BC-15. Conveyor belt BC-15 will move the clean coal into Clean Coal Stockpile #3 (OS-4) at transfer point TP-32.

Clean coal from Clean Coal Stockpile #1 (OS-2), Clean Coal Stockpile #2 (OS-3) and Clean Coal Stockpile #3 (OS-4) will be placed on conveyor belt BC-16 at transfer points TP-33, TP-34 and TP-35. Conveyor belt BC-16 will move the clean coal to the loadout at transfer point TP-36. Approximately 1,500,000 tons of clean coal product annually will be moved from the loadout bin (BS-8) through transfer point TP-37 into railcars for further distribution.

The facility shall be constructed and operated in accordance with the following equipment and control device information taken from registration application G10-D158 and any amendments thereto:

Equipment ID #	Date of Construction, Reconstruction or Modification <sup>1</sup>	G10-D Applicable Sections <sup>2</sup>	Emission Unit Description	Maximum Capacity		Control Device <sup>3</sup>	Associated Transfer Points		
				TPH	TPY		Location: B -Before A -After	ID. No.	Control Device <sup>3</sup>
<b>Raw Coal Circuit</b>									
BS-1	C 2015	5 and 8	Truck Dump Bin #1 - 200 tons capacity - receives raw coal from truck dumping and feeds it onto BC-1	500	2,380,953	PW	B A	TP-1 TP-3	UD-PW UD-PW
BC-1	C 2015	5 and 8	Belt Conveyor - receives raw coal from BS-1 and transfers it to BS-3	500	2,380,953	N	B A	TP-3 TP-5	UD-PW TC-WS
BS-3	C 2015	5 and 8	Raw Coal Silo #1 - 1,650 tons capacity - receives raw coal from BC-1, stores it and then drops it onto BC-4	500	2,380,953	FE	B A	TP-5 TP-11	TC-WS TC-WS
BS-2	C 2015	5 and 8	Truck Dump Bin #2 - 200 tons capacity - receives raw coal from truck dumping and feeds it onto BC-2	500	2,380,953	PW	B A	TP-2 TP-4	UD-PW UD-PW
BC-2	C 2015	5 and 8	Belt Conveyor - receives raw coal from BS-2 and transfers it to BS-4, BC-2.1 or OS-01	500	2,380,953	N	B A A A	TP-4 TP-6 TP-6 TP-8	UD-PW TC-WS TC-WS TC-WS
BS-4	C 2015	5 and 8	Raw Coal Silo #2 - 1,400 tons capacity - receives raw coal from BC-2, stores it and then drops it onto BC-4	500	1,071,429	FE	B A	TP-6 TP-12	TC-WS TC-WS
BC-2.1	C 2015	5 and 8	Belt Conveyor - receives raw coal from BC-2 and transfers it to BS-5	500	238,095	N	B A	TP-6 TP-7	TC-WS TC-WS
BS-5	C 2015	5 and 8	Raw Coal Silo #3 - 950 tons capacity - receives raw coal from BC-2, stores it and then drops it onto BC-4	500	238,095	FE	B A	TP-7 TP-13	TC-WS TC-WS
OS-01	C 2015	5 and 8	Raw Coal Open Storage Pile - maximum 12,000 ton capacity, 11,300 ft <sup>2</sup> base area and 80 ft height - receives raw coal from BC-2, stores it and then underground feeders transfer it onto BC-3	500	1,071,429	WS	B A	TP-8 TP-9	TC-WS LO-UC
BC-3	C 2015	5 and 8	Belt Conveyor - receives raw coal from OS-01 via underground feeders and transfers it to BC-4	500	1,071,429	N	B A	TP-9 TP-10	LO-UC TC-PE
BC-4	C 2015	5 and 8	Belt Conveyor - receives raw coal from BC-3, BS-3, BS-4 and BS-5 and transfers it to DD-1	800	4,761,906	N	B B B A	TP-10 TP-11 TP-12 TP-13 TP-14	TC-PE TC-WS TC-WS TC-WS TC-FE

Equipment ID #	Date of Construction, Reconstruction or Modification <sup>1</sup>	G10-D Applicable Sections <sup>2</sup>	Emission Unit Description	Maximum Capacity		Control Device <sup>3</sup>	Associated Transfer Points		
				TPH	TPY		Location: B -Before A -After	ID. No.	Control Device <sup>3</sup>
DD-1	C 2015	5 and 8	Double Deck Screen - receives raw coal from BC-4, classifies it and then drops +4" oversize refuse to BC-5 (see Refuse Circuit below), the -4" raw coal to RB-1, and the -4" x 0 raw coal to BC-6	800	4,761,906	FE	B A A A	TP-14 TP-15 TP-16 TP-17	TC-FE TC-FE TC-FE TC-FE
RB-1	C 2015	5 and 8	Breaker - receives +4" sized raw coal from DD-1, crushes it and then drops it to BC-6	180	1,071,429	FE	B A	TP-16 TP-17	TC-FE TC-FE
BC-6	C 2015	5 and 8	Belt Conveyor - receives sized raw coal from DD-1 and RB-1 and transfers it to the wet wash preparation plant	800	4,285,715	N	B A	TP-17 TP-20	TC-FE TC-FW
<b>Clean Coal Circuit</b>									
BC-12	C 2015	5 and 8	Belt Conveyor - receives clean coal from the wet wash prep plant and transfers it to BC-13	500	1,500,000	N	B A	TP-28 TP-29	TC-FW TC-WS
BC-13	C 2015	5 and 8	Belt Conveyor - receives clean coal from BC-12 and transfers it to OS-2 or BC-14	500	1,500,000	N	B A	TP-29 TP-30	TC-WS TC-WS
OS-2	C 2015	5 and 8	Clean Coal Open Storage Pile - maximum 12,400 ton capacity, 13,280 ft <sup>2</sup> base area and 70 ft height - receives clean coal from BC-13, stores it and underground feeders transfer it onto BC-16	500	500,000	WS	B A	TP-30 TP-33	TC-WS LO-UC
BC-14	C 2015	5 and 8	Belt Conveyor - receives clean coal from BC-13 and transfers it to OS-3 or BC-15	500	1,000,000	N	B A	TP-30 TP-31	TC-WS TC-WS
OS-3	C 2015	5 and 8	Clean Coal Open Storage Pile - maximum 14,400 ton capacity, 15,400 ft <sup>2</sup> base area and 70 ft height - receives clean coal from BC-13, stores it and underground feeders transfer it onto BC-16	500	500,000	WS	B A	TP-31 TP-34	TC-WS LO-UC
BC-15	C 2015	5 and 8	Belt Conveyor - receives clean coal from BC-14 and transfers it to OS-4	500	500,000	N	B A	TP-31 TP-32	TC-WS TC-WS
OS-4	C 2015	5 and 8	Clean Coal Open Storage Pile - maximum 10,100 ton capacity, 11,300 ft <sup>2</sup> base area and 67 ft height - receives clean coal from BC-15, stores it and underground feeders transfer it onto BC-16	500	500,000	WS	B A	TP-32 TP-35	TC-WS LO-UC
BC-16	C 2015	5 and 8	Belt Conveyor - receives clean coal from OS-2, OS-3 and OS-4 and transfers it to BS-8	4,000	1,500,000	N	B B B A	TP-33 TP-34 TP-35 TP-36	LO-UC LO-UC LO-UC TC-WS
BS-8	C 2015	5 and 8	Railcar Loadout Bin - 450 tons capacity - receives clean coal from BC-16 and loads it into railcars for shipment	4,000	1,500,000	FE	B A	TP-36 TP-37	TC-WS LR-TC
<b>Refuse Circuit</b>									
BC-5	C 2015	5 and 8	Belt Conveyor - receives +4" oversize refuse from DD-1 (see Raw Coal Circuit above) and transfers it to either BS-6 or BC-8 (see below)	80	476,191	N	B A	TP-15 TP-18	TC-FE TC-WS
BS-6	C 2015	5 and 8	Scalped Rock and Emergency Refuse Bin - 300 tons capacity - receives +4" oversize refuse from BC-5, stores it and then loads it into trucks from shipment to the refuse disposal area	80	20,000	FE	B B A	TP-18 TP-19	TC-WS TC-WS
BC-7	C 2015	5 and 8	Belt Conveyor - receives refuse from the wet wash prep plant and transfers it to BC-8	500	2,785,715	N	B A	TP-21 TP-22	TC-FW TC-WS
BC-8	C 2015	5 and 8	Belt Conveyor - receives refuse from the wet wash prep plant and +4" oversize refuse from BC-5 and transfers it to BC-9	500	3,261,906	N	B B A	TP-22 TP-18 TP-23	TC-WS TC-WS TC-WS
BC-9	C 2015	5 and 8	Belt Conveyor - receives refuse from BC-8 and transfers it to BC-10	500	3,261,906	N	B A	TP-23 TP-24	TC-WS TC-WS

Equipment ID #	Date of Construction, Reconstruction or Modification <sup>1</sup>	G10-D Applicable Sections <sup>2</sup>	Emission Unit Description	Maximum Capacity		Control Device <sup>3</sup>	Associated Transfer Points		
				TPH	TPY		Location: B - Before A - After	ID. No.	Control Device <sup>3</sup>
BC-10	C 2015	5 and 8	Belt Conveyor - receives refuse from BC-9 and transfers it to BC-11	500	3,261,906	N	B A	TP-24 TP-25	TC-WS TC-WS
BC-11	C 2015	5 and 8	Belt Conveyor - receives refuse from BC-10 and transfers it to BS-7	500	3,261,906	N	B A	TP-25 TP-26	TC-WS TC-WS
BS-7	C 2015	5 and 8	Truck Loadout Bin - 300 tons capacity - receives refuse from BC-11 and loads it to trucks which haul it to the refuse disposal area	500	3,261,906	FE	B A	TP-26 TP-27	TC-WS TC-WS

<sup>1</sup> In accordance with 40 CFR 60 Subpart Y, coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified after April 28, 2008 shall not discharge gases which exhibit 10 percent opacity or greater. For open storage piles constructed, reconstructed, or modified after May 27, 2009, the permittee shall prepare and operate in accordance with a fugitive coal dust emissions control plan that is appropriate for site conditions.

<sup>2</sup> All registered affected facilities under Class II General Permit G10-D are subject to Sections 1.0, 1.1, 2.0, 3.0 and 4.0.

<sup>3</sup> Control Device Abbreviations: FE - Full Enclosure; FW - Full Enclosure with Water Sprays; PE - Partial Enclosure; PW - Partial Enclosure with Water Sprays; WS - Water Sprays; TC - Telescopic Chute; and N - No Control.

## DESCRIPTION OF FUGITIVE EMISSIONS (taken directly from the application)

Fugitive dust at the Elk Creek Preparation Plant will be generated through two primary processes: haulage on unpaved haulroads and wind erosion from stockpiles.

There are three defined haulroads (OT-1, OT-2 and OT-3) within this application. Haulroad OT-1 is the primary haulroad for raw coal coming into the plant and consists of approximately 0.35 miles of unpaved surface. Haulroad OT-2 will be used for hauling refuse from the Scalped Rock and Emergency Refuse Bin BS-6 during times of emergency when the refuse belt is not in operation to the refuse disposal area and consists of approximately 0.73 miles of unpaved surface. Haulroad OT-3 is primarily in and around the processing plant area and will consist of plant/office, clean coal truck and other miscellaneous traffic. Haulroad OT-3 consists of approximately 0.23 miles of unpaved surface. All fugitive emissions from the haulroads will be controlled by the facility water truck (HR-WS) on an as needed basis.

There is one raw coal open stockpile (OS-1) and three clean coal open stockpiles (OS-2, OS-3 and OS-4) incorporated in this site design. The base area for raw coal stockpile OS-1 is 11,300 ft<sup>2</sup> and the design height is 80 feet. The base area for clean coal stockpile OS-2 is 13,280 ft<sup>2</sup> and the design height is 70 feet. The base area for clean coal stockpile OS-3 is 15,400 ft<sup>2</sup> and the design height is 70 feet. The base area for clean coal stockpile OS-4 is 11,300 ft<sup>2</sup> and the design height is 67 feet. Fugitive emissions from the open stockpiles will be controlled by water sprays (SW-WS).

## SITE INSPECTION

A site inspection was not deemed to be required at this time due to location proposed and the size and scope of the proposed facility. However, after construction is completed, the facility will be inspected on a predetermined schedule by the DAQ's Compliance and Enforcement Section.

Directions to the facility from Charleston are to take US Route 119 South and travel 52.8 miles, take the WV-73 ramp toward WV-10/Logan and travel 0.3 miles, turn left onto WV-73 and travel 2.3 miles, turn left onto Old Highway 119 and travel 0.6 miles, stay straight to go onto WV-10/Logan Blvd and continue to follow WV-10 for 8.9 miles, turn left to stay on WV-10 and travel 5.2 miles, turn right onto Mingo Highway/WV-80 and continue to follow WV-80 for approximately 4.8 miles to Wyo, WV, turn left onto County Route 11-1 and travel 1.38 miles to the proposed site.

**ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER**

Fugitive emission calculations for continuous and batch drop operations, transfer points, crushing and screening, storage piles, and paved and unpaved haulroads are based on AP-42 Fifth Edition “Compilation of Air Pollution Emission Factors”, Volume 1. Control efficiencies were applied based on “Calculation of Particulate Matter Emission - Coal Preparation Plants and Material Handling Operations.” The emission factors for crushing/breaking and screening operations were obtained from the Air Pollution Engineering Manual - Air & Waste Management Association - June 1992. The calculations were performed by the applicant using the DAQ’s G10-C Excel Emission Calculation Spreadsheet and were checked for accuracy and completeness by the writer.

The proposed construction will result in a new potential to discharge controlled particulate matter emissions of 107.59 pounds per hour (PPH) and 231.06 tons per year (TPY) of particulate matter (PM), of which 35.24 PPH and 77.69 TPY will be particulate matter less than 10 microns in diameter (PM<sub>10</sub>). Refer to the following table for a complete summary of the proposed facility-wide potential to discharge:

<b>- New Facility-wide Emissions Total - Ramaco Resources, LLC Caretta Prep Plant - G10-D153A</b>	<b>Controlled PM Emissions</b>		<b>Controlled PM<sub>10</sub> Emissions</b>	
	<b>lb/hour</b>	<b>TPY</b>	<b>lb/hour</b>	<b>TPY</b>
<b>Fugitive Emissions</b>				
Open Storage Pile Emissions	0.15	0.64	0.07	0.30
Unpaved Haulroad Emissions	87.85	176.82	25.89	52.17
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
<i>Fugitive Emissions Total</i>	<i>87.85</i>	<i>177.45</i>	<i>25.95</i>	<i>52.49</i>
<b>Point Source Emissions</b>				
Equipment Emissions	16.72	49.76	7.86	23.39
Transfer Point Emissions	3.03	3.84	1.43	1.82
<i>Point Source Emissions Total (PTE)</i>	<i>19.75</i>	<i>53.60</i>	<i>9.29</i>	<i>25.20</i>
<b>FACILITY EMISSIONS TOTAL</b>	<b>107.59</b>	<b>231.06</b>	<b>35.24</b>	<b>77.69</b>

**REGULATORY APPLICABILITY**

NESHAPS and PSD have no applicability to the proposed facility. The construction of

Ramaco Resources, LLC's proposed wet wash coal preparation plant is subject to the following state and federal rules:

**45CSR5**      *To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas*

The facility is subject to the requirements of 45CSR5 because it meets the definition of "Coal Preparation Plant" found in subsection 45CSR5.2.4. The facility should be in compliance with Section 3 (less than 20% opacity) and Section 6 (fugitive dust control system and dust control of the premises and access roads) when the particulate matter control methods and devices proposed are in operation.

**45CSR13**      *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation*

The proposed construction is subject to the requirements of 45CSR13 because it will result in a potential to discharge greater than six pounds per hour and ten tons per year of a regulated air pollutant (PM and PM<sub>10</sub>) and involve the construction of one (1) crusher, one (1) screen, 17 belt conveyors, eight (8) bins and four (4) open storage piles, which are defined as affected facilities and subject to 40 CFR 60 NSPS Subpart Y. The applicant has submitted an application for a G10-D general permit registration to modify. The applicant published a Class I legal advertisement in the *Logan Banner* on December 4, 2014 and submitted \$500 for the General Permit application fee and \$1,000 for the NSPS fee. The applicant published a revised Class I legal advertisement in the *Logan Banner* on April 24, 2015.

**45CSR16**      *Standards of Performance for New Stationary Sources*  
**40 CFR 60**      *Subpart Y: Standards of Performance for Coal Preparation and Processing Plants*

This facility is subject to 40 CFR 60 Subpart Y because it will be constructed after October 24, 1974 and processes more than 200 tons of coal per day. The proposed construction includes the construction of one (1) crusher, one (1) screen, 17 belt conveyors, eight (8) bins and four (4) open storage piles, which are defined as affected facilities in 40 CFR 60 Subpart Y. Therefore, the proposed construction is subject to 45CSR16, which incorporates by reference 40 CFR 60 Subpart Y - Standards of Performance for Coal Preparation Plants. The facility should be in compliance with Section 254(b) (less than 10% opacity for coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, re-constructed or modified after April 28, 2008) when the particulate matter control methods and devices proposed are in operation.

The owner or operator of an open storage pile, which includes the equipment used in the loading, unloading, and conveying operations of the affected facility, constructed, reconstructed, or modified after May 27, 2009, must prepare and operate in accordance with a submitted fugitive coal dust emissions control plan that is appropriate for the site

conditions. The fugitive coal dust emissions control plan must identify and describe the control measures the owner or operator will use to minimize fugitive coal dust emissions from each open storage pile. The plan must be submitted to the Director prior to startup of the new, reconstructed or modified open storage pile.

*45CSR30 Requirements for Operating Permits*

In accordance with 45CSR30 Major Source Determination, the proposed facility is not listed in 45CSR30 subsection 2.26.b as one of the categories of stationary sources which must include fugitive emissions (open storage piles constructed or modified on or before May 27, 2009 and haulroads) when determining whether it is a major stationary source for the purposes of § 302(j) of the Clean Air Act. The facility's potential to emit will be 25.50 TPY for PM<sub>10</sub> (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR30 threshold of 100 TPY of a regulated air pollutant used to define a major stationary source. Therefore, the facility will be a nonmajor source subject to 45CSR30. The facility is not subject to the permitting requirements of 45CSR30 and will be classified as a deferred source.

The construction of Ramaco Resources, LLC's proposed wet wash coal preparation plant is not subject to the following state and federal rules:

*45CSR14 Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration*

In accordance with 45CSR14 Major Source Determination, the facility is not one of the 100 TPY stationary sources listed under the definition of "Major Stationary Source" in subsection 2.43.a. Therefore, it must have the potential to emit 250 TPY or more of any regulated pollutant to meet the definition of a major source in subsection 2.43.b. At the end of subsection 2.4.3, this facility is not listed in Table 1 - Source Categories Which Must Include Fugitive Emissions. So, fugitive emissions (from open storage piles constructed or modified on or before May 27, 2009 and haulroads) are not included when determining major stationary source applicability. The facility's potential to emit will be 54.24 TPY for PM (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR14 threshold of 250 TPY for a regulated air pollutant used to define a major stationary source. Therefore, the proposed modification is not subject to the requirements set forth within 45CSR14.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

A toxicity analysis was not performed because the pollutants that are emitted from this facility are PM (particulate matter) and PM<sub>10</sub> (particulate matter less than 10 microns in diameter), which are non-toxic pollutants.

## AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling was not performed due to the size and location of this proposed facility. This proposed facility will be located in McDowell County, WV, which is currently in attainment for PM (particulate matter) and PM<sub>10</sub> (particulate matter less than 10 microns in diameter). This proposed facility will be a minor source as defined by 45CSR14, therefore, an air quality impact analysis is not required.

## MONITORING OF OPERATIONS

The coal processing and conveying equipment and storage areas should be observed to make sure that the facility is meeting the applicable visible emission standards of 40 CFR 60, Subpart Y. Visible emissions from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, re-constructed or modified after April 28, 2008 shall not exceed 10 percent (10%) opacity as stated in 40 CFR 60.254(b). Equipment used in the loading, unloading, and conveying operations of open storage piles are not subject to the maximum 10% opacity limitation.

The owner or operator of an open storage pile, which includes the equipment used in the loading, unloading, and conveying operations of the affected facility, constructed, reconstructed, or modified after May 27, 2009, must prepare and operate in accordance with a submitted fugitive coal dust emissions control plan that is appropriate for the site conditions. The fugitive coal dust emissions control plan must identify and describe the control measures the owner or operator will use to minimize fugitive coal dust emissions from each open storage pile. The plan must be submitted to the Director prior to startup of the new, reconstructed or modified open storage pile.

## RECOMMENDATION TO DIRECTOR

The information contained in this application for a general permit registration indicates that compliance with all applicable regulations should be achieved when all of the proposed particulate matter control methods are in operation. Due to the location, nature of the process, and control methods proposed, adverse impacts on the surrounding area should be minimized. No comments were received during the comment period. Therefore, the granting of a General Permit G10-D registration to Ramaco Resources, LLC for the construction of their proposed wet wash coal preparation plant to be located near Verner, McDowell County, WV is hereby recommended.



Daniel P. Roberts, Engineer Trainee  
NSR Permitting Section

July 31, 2015

Date

Fact Sheet G10-D158  
Ramaco Resources, LLC  
Elk Creek Processing Plant