

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04700017-2023**  
Application Received: **January 4, 2023**  
Plant Identification Number: **03-54-047-00017**  
Permittee: **Ramaco Resources, LLC**  
Facility Name: **Amonate Preparation Plant**  
Mailing Address: **250 West Main Street Suite 1900, Lexington, KY 40507**

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Physical Location: Vallscrew, McDowell County, West Virginia  
UTM Coordinates: 441.76 km Easting • 4118.34 km Northing • Zone 17  
Directions: Take I-77 South to Route 52N to 460W going into Virginia. At approximately 24 miles into Virginia, turn right (North) onto SR 637 near Maxwell, VA. Follow SR 637 to the intersection of SR 637 and SR 631. Turn right for about 0.2 miles then turn left onto SR 637 again. Travel for approximately 10 miles. Then turn left at bridge. Follow to facility, turn right.

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### Facility Description

Ramaco Resources, LLC's Amonate Preparation Plant, a wet-wash coal preparation plant with thermal dryer, has the ability to screen, break/size, wash, thermally dry, store and load out/in coal. The maximum capacity of the preparation plant is 658 tons per hour and 5,764,000 tons per year of raw coal input. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week. Ramaco Resources, LLC's Amonate Preparation Plant is covered by SIC Code 1221 and NAICS Code 212111.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions <sup>1</sup></b>
Carbon Monoxide (CO)	709.68	0
Nitrogen Oxides (NO <sub>x</sub> )	215.11	0
Particulate Matter (PM <sub>2.5</sub> )	Not available	0
Particulate Matter (PM <sub>10</sub> )	386.91	0
Total Particulate Matter (TSP)	812.54	0
Sulfur Dioxide (SO <sub>2</sub> )	832.2	0
Volatile Organic Compounds (VOC)	208.36	0

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions <sup>1</sup></b>
Hydrochloric Acid Aerosols	4.8	0
Hydrofluoric Acid	3.8	0
Total HAPs	8.6	0

<sup>1</sup> The last emissions data available from the State and Local Emissions Inventory System (SLEIS) is for the year 2013. There are no emissions data in SLEIS for years 2014 through 2021, and the 2022 reporting year status is "not started" and is therefore unavailable. The facility has been temporarily shut down since September of 2012 per 3/5/2018 technical correspondence.

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 709.68 TPY of Carbon Monoxide (CO), 215.11 TPY of Nitrogen Oxides (NO<sub>x</sub>), 386.91 TPY of Particulate Matter (PM<sub>10</sub>), 832.2 TPY of Sulfur Dioxide (SO<sub>2</sub>), and 208.36 TPY of Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Ramaco Resources, LLC's Amonate Preparation Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR5	Operation of Coal Preparation Plants
	45CSR6	Open burning prohibited.
	45CSR10	Control of Sulfur Dioxide Emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources

	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60 Subpart Y	Standards of Performance for Coal Preparation Plants
	40 C.F.R. Part 61 Subpart M	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-0267A	January 7, 2003	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

Since the current operating permit R30-04700017-2018 was issued, there have been no changes to the Title V Permit. The Amonate Preparation Plant is currently idle due to economic conditions. The following updates have been made for the renewal permit:

- Permit Transfer and Permittee Name Change.** In a letter dated November 15, 2022, the Director acknowledged the transfer of the Title V permit previously issued to Buchanan Minerals, LLC for the Amonate Preparation Plant, to Ramaco Resources, LLC. For the Title V permit renewal, the permittee's name, address and telephone number have been changed on the permit cover page, page 2 and in the header.
- Condition 2.1.3.** – This condition was updated to delete the word “such” which was removed from 45CSR30 effective March 31, 2023. The reference was changed from 45CSR§30-2.12 to 45CSR§30-2.39. because the definition of “Secretary” was renumbered in a previous version of 45CSR30.

3. **Condition 2.11.4.** - The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
4. **Conditions 2.17., 3.5.7. and 3.5.8.a.1.** – These conditions were deleted and replaced with “Reserved” because the emergency provisions under 45CSR§30-5.7 were removed from 45CSR30 effective March 31, 2023.
5. **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it was repealed.
6. **Condition 3.5.3.** - The US EPA contact information and address were updated.
7. **Condition 3.5.4.** – This condition was updated because the requirement to submit a certified emissions statement was removed from 45CSR30 effective March 31, 2023.
8. **Condition 3.5.8.a.2.** – This condition was updated to replace the word “telefax” with “email” according to the change in 45CSR30 effective March 31, 2023.
9. **Review of Condition 4.3.1.** The thermal dryer was last operated in September 2012. It did not come back online for continuous operation during the current permit term. Consequently, no stack testing was performed per condition 4.3.1. during the current permit term. Based upon these facts, the language in condition 4.3.1. remains valid for this renewal and no changes are required.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

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|---------------------------|--|
| 45CSR§10-5.1              | The thermal dryer is not defined as a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. |
| 40 C.F.R. 63 Subpart ZZZZ | The facility does not have any reciprocating internal combustion engines (RICE); therefore, this subpart is not applicable.                        |

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date:	February 21, 2023
Ending Date:	March 23, 2023

### Point of Contact

All written comments should be addressed to the following individual and office:

Dan Roberts  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41902  
Daniel.p.roberts@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

During the comment period, 45CSR30 was revised effective March 31, 2023. This resulted in several changes to the Title V permit boilerplate language which have been incorporated and were added as items 2, 4, 7 and 8 under Determinations and Justifications.

No comments were received from EPA, the company, the consultant or the public during the comment period.