

Air Products and Chemicals, Inc.
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03 May 2016

CERTIFIED MAIL

Article No.: 7196 9008 9115 5662 7378

West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Air Products and Chemicals
New High-Purity Nitrogen Unit
Air Permit Determination / Exemption Request
New Martinsville, WV

Dear Maam / Sir:

Air Products and Chemicals, Inc. (Air Products) plant to construct, own and operate an air separation unit on Covestro's property in New Martinsville, WV, for the production of high-purity nitrogen (HPN). Air Products HPN unit will supply up to 75,000 standard cubic feet per hour of gaseous nitrogen from this new plant to Covestro, the former Bayer facility. Start-up of the new HPN unit is scheduled for August 2016.

Nitrogen will be produced through an adsorption and cryogenic process that removes water and carbon dioxide, and selectively separates and purifies the nitrogen from oxygen present in atmospheric air. There will be some continuous and intermittent vents associated with the plant that will emit these same gases alone or in combination. Please refer to the enclosed Process Description and Process Flow Diagram for more discussion on the HPN process.

Atmospheric air is the only raw material in this process. The operation is one of physical separation rather than chemical change, and no regulated air pollutants are created or otherwise emitted. Further, there are no combustion sources associated with the facility. Process machinery is electric-powered. A facility equipment arrangement drawing is also enclosed.

Air Products believes this new HPN plant is exempt from construction and operating permit requirements per 45CSR13. Air Products has received air permit exemption determinations from the Department for similar air separation units in Apple Grove and Willow Island, WV. I am requesting the Department evaluate the enclosed information to confirm this determination. If this determination is not correct, please notify Air Products at the earliest possible opportunity so we may immediately commence the appropriate air permit application activities.

If further information is required, please contact me by email at keckbr@airproducts.com, or by phone at 610-481-8432.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Keck', with a large loop at the end.

Brian R. Keck
Environmental Manager – Industrial Gases North America
Air Products