



Norfolk Southern Corporation  
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William R. Wagner, P.E.  
Environmental Compliance

September 3, 2013

Ms. Elizabeth Gayne  
Senior Environmental Specialist  
Virginia Department of Environmental Quality  
Northern Regional Office  
13901 Crown Court  
Woodbridge, VA 22193

Subject: Norfolk Southern Railway Company  
Request for Exemption – Alexandria, VA

Dear Ms. Gayne:

During our telephone conversation on August 27, 2013, you informed me that the Virginia Administrative Code, 9 VAC 5-80-1105 B.4, provides a permit exemption for the transfer and storage of volatile organic compound (VOC) liquids having a vapor pressure less than 1.5 pounds per square inch absolute (psia). You stated that if the products transferred at the Alexandria facility are below this vapor pressure threshold at the meteorological conditions local to Alexandria, Virginia, then the Alexandria transloading operation would be exempt from the requirement to obtain a Minor New Source Review permit under Article 6 of 9 VAC 5-80.

Norfolk Southern Railway Company ("NSRC") has reviewed the regulation and used EPA's TANKS4.09 program to determine the vapor pressure of the denatured fuel ethanol (a blend of 95 percent ethanol and 5 percent gasoline ("E95")) transloaded at the facility. Using the meteorological data for Washington National Airport, EPA's TANKS4.09 program determined

that the vapor pressure of E95 ranges from 0.7302 psia to 0.9670 psia<sup>1</sup>. Because the vapor pressure is less than 1.5 psia at the local conditions, NSRC agrees with VADEQ that the exemption provided by 9 VAC 5-80-1105 B.4 is applicable to the Alexandria transloading operation and the operation is exempt from permitting requirements. Upon receipt of VADEQ's concurrence that the Alexandria transloading operation is exempt from permitting requirements, NSRC will withdraw its air permit application currently under review.

Thank you for your consideration in this matter, and if you would like to discuss this request in further detail, please contact me at (404) 582-4339.

Sincerely,

*William Wagner, P.E.*

William R. Wagner, P.E.  
Norfolk Southern Railway Company

cc: D. F. Julian, NSRC  
M. R. McClellan, NSRC  
S. D. McGregor, NSRC  
R. P. Russell, NSRC  
L. D. Marilley, NSRC  
C. R. McDaniel, NSRC  
M. A. Gernand, NSRC  
G.O. Turner, NSRC

<sup>1</sup> The vapor pressure determined by Tanks 4.09 is presented below:

**Alexandria E95 Transloading - Horizontal Tank**  
**Alexandria, Virginia**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
E95	All	59.65	55.03	64.27	58.03	0.8410	0.7302	0.9670	49.5134			47.25	
Ethyl alcohol						0.6498	0.5535	0.7604	46.0700	0.9500	0.7005	46.07	Option 2: A=8.321, B=1718.21, C=237.52 Option 4: RVP=15, ASTM Slope=3
Gasoline (RVP 15.0)						8.0959	7.4337	8.8039	60.0000	0.0500	0.2995	92.00	