



Norfolk Southern Corporation
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William R. Wagner
Engineer
Environmental Compliance

February 24, 2014

Via Overnight Mail and Email

Mr. James B. LaFratta
Air Permit Section
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

Subject: Norfolk Southern Railway Company
Van Dorn Street Yard Exemption

Dear Mr. LaFratta:

This letter follows up on Norfolk Southern Railway Company's (NSRC) letter of September 3, 2013 addressed to Ms. Elizabeth Gayne of the Virginia Department of Environmental Quality (VADEQ) regarding an exemption from air permitting requirements relating to NSRC's transloading operation located at 1000 South Van Dorn Street in Alexandria, Virginia (the "Facility"). Given the passage of time since NSRC submitted the letter and supporting information, and based on conversations with VADEQ since that time, it is NSRC's understanding that the Facility is exempt from permitting pursuant to Virginia Administrative Code 9 VAC 5-80-1105 B.4.

As you are aware, NSRC submitted a Minor New Source Review Permit Application on January 4, 2013. VADEQ subsequently advised NSRC that 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). On September 3, 2013, at VADEQ's request, NSRC submitted a formal Request for Exemption and provided information and calculations regarding the vapor pressure of the denatured fuel ethanol transloaded at the Facility. Additionally, pursuant to VADEQ's September 20, 2013 letter, NSRC provided similar information regarding the vapor pressure of the used oil that is transloaded at the Facility. These submittals conclusively showed that the vapor pressure of the ethanol and used oil was less than 1.5 psia and that the transloading of these products is exempt pursuant to 9 VAC 5-80-1105 B.4.

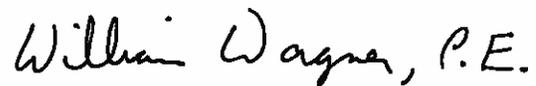
It is NSRC's understanding that VADEQ concurs that the transloading of denatured ethanol and used oil at the Facility is exempt pursuant to 9 VAC 5-80-1105 B.4. While

there is no regulatory requirement for VADEQ to make a written determination of such exemption, if VADEQ disagrees with NSRC's exempt status, we ask that you inform us in writing within 14 days. Assuming no objection from VADEQ, NSRC requests that VADEQ deem NSRC's January 4, 2013 permit application withdrawn, effective March 12, 2014 and NSRC will continue to operate the Facility pursuant to the exemption set forth in 9 VAC 5-80-1105 B.4.

Based on the foregoing, it is NSRC's understanding that upon withdrawal of the air permit application, no further permit action will be pending and VADEQ need not facilitate further public involvement related to air permits at the Facility. Nonetheless, NSRC and the City of Alexandria are in discussions relating to an information session relating to the Facility.

We thank you for your assistance in this matter and request that you inform us in writing within 14 days if VADEQ determines that the transloading operation at the Facility is not exempt pursuant to 9 VAC 5-80-1105 B.4.

Sincerely,



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

cc: Hon. William D. Euille
Mr. William Skrabak
D.F. Julian, NSRC (via email)
M.R. McClellan, NSRC (via email)
S.D. McGregor, NSRC (via email)
R.P. Russell, NSRC (via email)
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