



COMMONWEALTH of VIRGINIA
Office of the Attorney General

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August 4, 2017

The Honorable David K. Paylor, Director
Virginia Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219

Re: Aboveground Storage Tank and Pipeline Facility Financial Responsibility Requirements
(9 VAC 25-640, *et seq.*)

Dear Director Paylor:

I have reviewed the above-referenced regulations. It is my opinion that the State Water Control Board has the statutory authority for the regulations pursuant to Chapter 3.1 of Title 62.1 of the Code of Virginia and further that the regulations do not exceed the authority to regulate granted as set out in the enabling legislation.

This certification addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the regulations.

If I may be of any further assistance to you relating to this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "David C. Grandis".

David C. Grandis
Assistant Attorney General