



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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April 24, 2019

The Honorable David K. Paylor, Director
Virginia Department of Environmental Quality
1111 East Main Street
Richmond, Virginia 23219

Re: Periodic Review of the Tank Vessel Oil Discharge Contingency Plan and Financial
Responsibility Regulation
(9 VAC 25-101, *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 25 of Title 62.1 of the Code of Virginia.

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
Senior Assistant Attorney General