



# COMMONWEALTH of VIRGINIA

Office of the Attorney General

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March 20, 2019

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

Re: Periodic Review of the Closure Plans and Financial Capability Regulations  
(9 VAC 25-650)

Dear Director Paylor:

I have reviewed the above-referenced regulation. It is my opinion that the State Water Control Board has the statutory authority for the regulation pursuant to Va. Code §§ 62.1-44.15 and 62.1-44.18:3 and that the regulation does 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 regulation.

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