

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12VAC 5-630
VAC Chapter title(s)	Private Well Regulations
Action title	Amended Regulations
Date this document prepared	May 20, 2024. Revised May 30, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Final Regulations

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: VDH does not anticipate that the proposed changes will alter the cost to locate, permit, design or construct a private well, or create other direct cost for well owners, water well system providers, or state agencies.</p> <p>Indirect Costs:</p> <p><i>Section 380 and Table 1: eliminating the separation distance from termite treated structures (reduction based on toxicological assessment of currently used termiticides).</i> The Private Well Regulations (Regulations) currently require a 50-foot setback of private wells from termite treated foundations. The Regulations date from 1990 when termite pesticides presented known risk to soil and groundwater. Since that time, there have been considerable changes in the regulation of pesticides, with associated lowering of the risk of pesticides to soil and groundwater. In 2018, the Virginia Department of Health (VDH) Office of Environmental Health Services (OEHS) and the agency’s State Toxicologist performed a study of these changes, and of the ongoing risk of termite pesticides applied in the latter part of the 20th century. As a result of this study, the revised regulations eliminate the setback from termite treated foundations. This represents a significant improvement not just for well location, but also for repairs to onsite sewage system failures and existing well replacements.</p> <p>Further, when a well location is found to be fewer than 50 feet from a termite treated building foundation, under current regulations the well owner must either abandon and replace the well or apply for a variance. Variances have been approved based on VDH’s study of risk presented by current pesticides. However, this consumes VDH staff resources and adversely affects the well owner based on the time needed to process the variance. The Commissioner has issued over a dozen such variances since 2022. OEHS does not know the number of well owners who elect to abandon and replace a private well because of this setback, but anecdotally we know this has occurred. VDH estimates the average cost to abandon and drill a new well to be approximately \$23,000.</p> <p>Another change which will benefit well owners, homeowners, and professional service providers of onsite water and wastewater systems is in section 450.C.4.</p> <p>Section 450.C.4 of the Regulations currently stipulate that bored wells which have been abandoned “shall be treated as wells with respect to determining the minimum separation distances to sources of contamination....” This requirement is intended to protect groundwater resources. However, no other state recognizes an abandoned bored well</p>
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to remain classified to be a well in relation to separation distances. One result of this current requirement is that it serves to limit land area suitable for possible onsite sewage system installation or repairs, which can be a significant economic hardship to owners of small lots. Owners may be required to install an alternative onsite sewage system (AOSS) due to the reduced area available. VDH estimates the average AOSS to cost approximately \$40,000. In the worst-case scenario this can result in the need to condemn a home. The revised Regulations include a well abandonment procedure which eliminates the “remains a well” consideration. This will have significant economic benefit to homeowners and private sector water and wastewater service providers. Under the present Regulations, indirect costs to well owners (related to termite treatment setback and bored well abandonment) may include variances (including potential financial penalty if a mortgage rate deadline is missed), need to abandon and relocate wells, and possible increased costs for onsite sewage system design, installation or repair. At the extreme, it could necessitate the condemnation of a home. Such costs range from less than \$1,000 to tens of thousands of dollars. The elimination of the separation distance from termite treated foundations provision from the Regulations eliminate these indirect costs.

Direct Benefits:

- Section 10 includes definition for lead free. The direct benefit is protection of public health, especially for children, by reduction of the risk of exposure to lead.
- Section 240 allows for the designation of a well area on private well construction permits. The direct benefit is a reduction in the number of the wells which have to be abandoned and replaced because they were installed in the wrong location.
- Section 360 creates Class IV subclasses that mirror Class III well subclasses. The direct benefit is to prevent abandonment or replacement of Class IV wells intended to be repurposed for potable water supply when well construction does not conform to a Class III standard.
- Section 400 includes provisions of well construction material specifications consistent with current industry standards. The direct benefit is enhanced protection of public health and groundwater resources via clearer and more comprehensive material specification.
- Section 410 decreases depth when pouring of grout is acceptable in bored wells from 30 feet to 20 feet. The direct benefit is protection of public health and groundwater resources by reducing the chance of bridging or other grouting failure during well construction.
- Section 410 adds subsections pertaining to the well bore, filter pack well development, and well maintenance and repair. The direct benefit is protection of public health and groundwater resources by

	<p>clarification of the minimum construction standards for private wells using current industry standards.</p> <ul style="list-style-type: none"> ● Section 420 clarifies that test and exploration wells are not observation/monitoring wells and further clarifies that permanent abandonment of observation/monitoring wells is required following cessation of use. The direct benefit is protection of public health and groundwater resources by encouraging abandonment of unused wells. Further, it eliminates a loophole by which certain wells bypass permitting as private wells. ● Section 430 is amended to provide the option for an alternate method of well disinfection endorsed by the National Groundwater Association. The direct benefit is to protect public health and groundwater resources by allowance for well disinfection methodology consistent with site specific considerations. This also benefits well drillers by providing additional options for well disinfection. ● Section 450 includes provision that the Water Well System Provider notify VDH prior to well abandonment, identifies materials prohibited from use in well abandonment (e.g. coal ash), and identifies a method to abandon a bored well such that it no longer needs to be considered as a well with respect to separation distances. The direct benefit is enhanced protection of public health and groundwater resources by improved well abandonment practices. <p>Indirect Benefits</p> <p>Overall increase in protection of public health and groundwater resources and reduction of potential scenarios that create economic burden on well owners. The changes will reduce the number of wells that need to be abandoned and replaced; increase land available on properties for purposes of onsite sewage system installation/repair and other home improvements; reduce the number of variances requested of the department; and reduce the risk of ancillary financial risk to private well owners (e.g., reduced risk of missing mortgage rate lock deadlines resulting from delay in home purchase closure caused by private well construction issues).</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	VDH does not anticipate increase in the cost to permit or install a private well as result of the amended Regulations.	VDH anticipates the elimination of potential indirect costs related to separation distance from termite treated foundations and revision of policy related to the abandonment of bored wells. The indirect costs, currently borne by the well owner, range from \$1000 to tens of thousands of

		dollars, and in the worst-case potential condemnation of a home.
(3) Net Monetized Benefit	\$1000 and up	The direct and indirect cost of the Regulations are not quantifiable because every application for a private well construction is unique. The specific cost incurred by each applicant is unknown until a permit application is received and a site assessment is conducted.
(4) Other Costs & Benefits (Non-Monetized)	None known.	
(5) Information Sources	<ul style="list-style-type: none"> • Average costs of well installation through Septic and Well Assistance Program • Average cost of onsite sewage system installation and repairs through Septic and Well Assistance Program • Agency variance tracking log. 	

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Maintaining the status quo will result in direct costs to some well owners and the agency related to the application and processing of variance requests related to separation distance from termite treated foundations. The cost to the agency based on personnel costs is \$3,250 per year, based on the average number of variances processed from 2019-2023. The total direct cost to well owners can vary considerably, and some well owners experience direct cost of tens of thousands of dollars under the current regulations.</p> <p>Indirect Costs: The indirect cost to well owners related to maintaining the status quo can be significant, including increase in mortgage interest rate resulting from delay resulting from variance application, cost to abandon and replace of a private well, and increase in cost for onsite sewage system as result of well location with respect to the onsite system.</p> <p>Direct Benefits: Maintaining the status quo provides no benefits and may delay actions on permits and increase agency cost.</p> <p>Indirect Benefits: There are no indirect benefits for maintaining the status quo.</p>
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) VDH anticipates that maintaining the status quo will continue the potential for indirect costs borne by the well owner, ranging from \$1000 to tens of thousands of dollars, and in the worst-case potential condemnation of a home, as a result of continued requirement for separation from termite treated foundations and the requirement to consider abandoned bored wells to remain wells with respect to separation distance.	(b) None
(3) Net Monetized Benefit	None	
(4) Other Costs & Benefits (Non-Monetized)	None known	
(5) Information Sources	<ul style="list-style-type: none"> • Average costs of well installation through Septic and Well Assistance Program • Average cost of onsite sewage system installation and repairs through Septic and Well Assistance Program • Agency variance tracking log. 	

Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Alternative Approach: Section 380 and Table 1 maintain 25-foot separation distance from all termite treated structures.</p> <p>Direct Costs: This alternative approach changes the safety factor for the separation distance but is unsupported by the findings of VDH’s 2018 toxicology study. The direct costs (e.g., permitting, site inspection) for the alternative approach are not anticipated to change for Local Health Departments or private sector providers based on historical variances. The alternative approach is anticipated to reduce the number of variances submitted and processed for separation distance from termite-treated foundations and for abandonment of bored/hand-dug wells.</p>
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	<p>The direct costs for variance processing incorporate time required of EH Managers (District), OEHS and Commissioner’s Office personnel (Central Office) to process a variance. Based on the number of variances related to termite treatment, the average number of variances processed related to the separation distance from termite treated foundations is five per year. The total personnel costs to process a variance is estimated to average \$650.00 (LHD up to Commissioner of Health).</p> <p>Direct Benefits: The direct benefit of this proposed change is reduction of variances regarding the separation distance between termite treated foundations and private wells for these purposes. However, owners seeking to install a well between 15 feet and 24 feet from a termite treated foundation would still need a variance. This provides a direct benefit builders and homeowners that would have otherwise had to wait 30 to 60 days for a variance to be processed.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$3,000 (year 1)	(b) \$3,250 per year (5 or fewer variances at \$650 each)
(3) Net Monetized Benefit	\$25,555	
(4) Other Costs & Benefits (Non-Monetized)	<p>There would be a cost to this alternative in that it is not supported by VDH review of the risks to groundwater and public health associated with termite treatment. Moreover, this alternative would reduce but not eliminate the risk of indirect cost to well owners.</p> <p>There are no additional indirect costs, as VDH is not proposing other alternatives to the status beyond those provided above.</p>	
(5) Information Sources	Variance costs determined by review of agency variance tracking log, and hours expended by involved staff and average hourly rates (HR).	

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>There are no anticipated direct costs or benefits to local partners. Localities having ordinances pertaining to private wells may need to revise ordinances to maintain consistency with the revised Regulations. VDH anticipates that this effort will be absorbed in existing locality budgets.</p>
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	None identified	
(4) Assistance	NA	
(5) Information Sources	NA	

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>There are no anticipated direct costs to families. The cost for private well installation is not anticipated to be affected by this regulatory change.</p> <p>As outlined in Table 1A, families will receive the direct financial benefit of avoiding additional expense currently required to meet the minimum separation distance from a termite treated foundation or abandoned bored well.</p> <p>As outlined in Table 1A, families will receive the indirect benefit of lower financial risk because of the elimination of the termite treatment setback and the “remains a well” provision.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Range from \$0 to cost of home.	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>The indirect costs and the indirect benefits of the regulatory changes on families are not quantifiable because every application for a private well construction permit is unique. The specific benefits received by a family is unknown until such time that a permit request is received, and a site assessment conducted. In general, the proposed changes incorporate</p>	

	standard industry practice which ensure the protection of family’s health by ensuring properly constructed private wells.
(4) Information Sources	<ul style="list-style-type: none"> • Average costs of well installation through Septic and Well Assistance Program • Average cost of onsite sewage system installation and repairs through Septic and Well Assistance Program • Agency variance tracking log.

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	There are no anticipated direct costs or benefits to small businesses. The primary small businesses using the Private Well Regulations are Water Well Systems Providers, well construction material manufacturers and vendors, Onsite Soil Evaluators, and Professional Engineers. The regulatory change is not anticipated to affect the cost of permitting or construction of private wells.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	The indirect benefits of the regulatory changes on small businesses is not quantifiable because every application for a private well construction permit is unique. The specific benefits received by small businesses is unknown until such time that a permit request is received, and a site assessment conducted.	
(4) Alternatives	There are no anticipated direct costs or benefits to small businesses; therefore, alternatives other than maintaining the status quo were not considered.	
(5) Information Sources	Average cost of private well installation (varies based on geology and well depth)	

Changes to Number of Regulatory Requirements**Table 5: Regulatory Reduction**

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
12VAC5-630-10	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-20	(M/A):	1			
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-30	(M/A):	1			
	(D/A):	3			
	(M/R):				
	(D/R):				
12VAC5-630-40	(M/A):	1	Note: section is repealed		
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-50	(M/A):				
	(D/A):				
	(M/R):		+1		+1
	(D/R):	1			
12VAC5-630-60	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-70	(M/A):				
	(D/A):				

	(M/R):				
	(D/R):	2			
12VAC5-630-80	(M/A):				
	(D/A):				
	(M/R):	1			
	(D/R):				
12VAC5-630-90	(M/A):	1			
	(D/A):	8			
	(M/R):				
	(D/R):				
12VAC5-630-100	(M/A):	1			
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-110	(M/A):	1			
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-120	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-140	(M/A):				
	(D/A):	2			
	(M/R):				
	(D/R):				
12VAC5-630-150	(M/A):	6			
	(D/A):	10			
	(M/R):	1			
	(D/R):	1			
12VAC5-630-160	(M/A):				
	(D/A):				
	(M/R):				

	(D/R):				
12VAC5-630-170	(M/A):				
	(D/A):	21			
	(M/R):				
	(D/R):	9			
12VAC5-630-180	(M/A):	14			
	(D/A):	4			
	(M/R):	1			
	(D/R):				
12VAC5-630-190	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	4			
12VAC5-630-200	(M/A):				
	(D/A):	1			
	(M/R):				
	(D/R):				
12VAC5-630-210	(M/A):				
	(D/A):	1			
	(M/R):	2			
	(D/R):	3		-2	-2
12VAC5-630-220	(M/A):				
	(D/A):	2			
	(M/R):	2			
	(D/R):	9			
12VAC5-630-230	(M/A):				
	(D/A):	3			
	(M/R):	1			
	(D/R):	19			
12VAC5-630-240	(M/A):	1			
	(D/A):				
	(M/R):				
	(D/R):	1			

12VAC5-630-250	(M/A):				
	(D/A):	7			
	(M/R):				
	(D/R):	4			
12VAC5-630-260	(M/A):				
	(D/A):	2			
	(M/R):				
	(D/R):	17		-1	-1
12VAC5-630-270	(M/A):				
	(D/A):	5			
	(M/R):				
	(D/R):	3			
12VAC5-630-271	(M/A):				
	(D/A):				
	(M/R):	10			
	(D/R):				
12VAC5-630-272	(M/A):	1			
	(D/A):	5			
	(M/R):				
	(D/R):	1			
12VAC5-630-280	(M/A):	7			
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-630-290	(M/A):				
	(D/A):	3			
	(M/R):				
	(D/R):				
12VAC5-630-300	(M/A):				
	(D/A):	3			
	(M/R):				
	(D/R):	1			
	(M/A):				

12VAC5-630-310	(D/A):				
	(M/R):				
	(D/R):	2			
12VAC5-630-320	(M/A):	1			
	(D/A):	2			
	(M/R):				
	(D/R):				
12VAC5-630-330	(M/A):				
	(D/A):	1			
	(M/R):				
	(D/R):	1			
12VAC5-630-331	(M/A):		+3		+3
	(D/A):		+2		+2
	(M/R):		+5		+5
	(D/R):				
12VAC5-630-340	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	4			
12VAC5-630-350	(M/A):				
	(D/A):	1			
	(M/R):	1			
	(D/R):				
12VAC5-630-360	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	7	+4		+4
12VAC5-630-370	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	23		-23	-23
12VAC5-630-380	(M/A):				
	(D/A):	3			

	(M/R):		+3		+3
	(D/R):	59	+4		+4
12VAC5-630-390	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	5			
12VAC5-630-400	(M/A):				
	(D/A):	1			
	(M/R):				
	(D/R):	24	+2		+2
12VAC5-630-410	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	93	+6		+6
12VAC5-630-420	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	3	+2		+2
12VAC5-630-430	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	4	+1		+1
12VAC5-630-431	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):		+26		+26
12VAC5-630-440	(M/A):	Note: section is repealed			
	(D/A):				
	(M/R):				
	(D/R):	2		-2	-2
12VAC5-630-450	(M/A):				
	(D/A):	3			
	(M/R):				

	(D/R):	34	+6		+6
12VAC5-630-460	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	6			
12VAC5-630-470	(M/A):	Note: Section is repealed			
	(D/A):				
	(M/R):				
	(D/R):	22		-22	-22
12VAC5-630-480	(M/A):	Note: Section is repealed			
	(D/A):				
	(M/R):				
	(D/R):	16		-16	-16
Documents Incorporated by Reference will not be made part of the Regulations					
				Grand Total of Changes in Requirements:	(M/A): +3
					(D/A): +2
					(M/R): +9
					(D/R): -15

Key:

Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:

(M/A): Mandatory requirements mandated by federal and/or state statute affecting the agency itself

(D/A): Discretionary requirements affecting agency itself

(M/R): Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

(D/R): Discretionary requirements affecting external parties, including other agencies

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved*	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden
12VAC5-630-210 Appeals	The references to rights for appeals for variances afforded to the regulated community under the Administrative Process Act were deleted as unnecessary on the basis they are provided in Section 170.	Reduces D/R by 1
12VAC5-630-260 Express Class IV construction permits	This change deletes an obsolete reference to a DPOR requirement for a contractor's license	Reduces D/R by 1
12VAC5-630-360 Classes of water wells	The additional requirements reclassify Class IV (non-potable) wells to match the Class III (potable) construction standards.	If a private well owner desires to convert a Class IV well to Class III use, this will reduce a potential indirect cost for well replacement or inspection.
12VAC5-630-380 Well Location	Modification of separation distance criteria	Includes additional features to incorporate into sanitary survey & eliminates unnecessary features. Change in time/effort to conduct sanitary survey will be minimal. Is anticipated to significantly reduce risk of indirect costs for well owners by virtue of elimination of setback from termite treated foundations. The clarification of the demonstration required to comply with § 3.2-176.5:2 of the Code of Virginia places additional requirements on some well owners; however, these requirements provide well owners more options for acceptable well locations and prevent indirect costs which could otherwise be associated with more expensive onsite sewage systems necessary to comply with the Code.
12VAC5-630-400 Materials	Provision of lead-free standard and NSF water well labeling	This will protect public health and is not anticipated to reduce

	Standards provided for gravel pack, water used during construction, and disinfection.	<p>or increase regulatory burden on Water Well Systems Providers, materials manufacturers/ vendors or well owners. System Providers to construct wells.</p> <p>The benefit to well owners is that criteria for VDH to inspect and approve wells and issue inspection statements (Section 330) is incorporated into the regulations to enhance clarity.</p>
12VAC5-630-410 Construction; general	These are additional requirements addressing aspects of well construction and protection of groundwater quality. VDH does not anticipate that this will reduce or increase the regulatory burden on Water Well System Providers because these requirements represent existing industry standards.	These additions provide clarity, which will protect the rights of well owners in the event of disputes related to well construction (e.g. potential adverse effects on water quality because the water well system provider did not follow the construction requirements in this section).
12VAC5-630-420 Observation, monitoring, and remediation wells	Observation/monitoring wells are not regulated under the Private Well Regulations (other than abandonment).	Two additional D/R requirements specifically eliminate loopholes related to observation and monitoring wells which have for decades represented a threat to groundwater resources. There is no anticipated burden on private well owners or Water Well Systems Providers.
12VAC5-630-430 Disinfection	The additional discretionary requirement provides an option for well disinfection which increases the flexibility of Water Well System Providers to use project-specific criteria.	One additional D/R, however, it allows choice of methods, which improves ability of Water Well System Provides to serve the client.
12VAC5-431 Water Quality	Replaces former section 370 and adds three D/R requirements.	The additional discretionary requirements provide owners of non-potable private wells demonstration criteria by which the wells can be reclassified for potable use,

		thus eliminating the potential indirect cost of installing a new well.
12VAC5-630-440 Information to be reported	This section has been repealed as redundant to Section 310.	Reduces D/R by 2
12VAC5-630-450 Well abandonment	Provides additional method for bored well abandonment which eliminates the “remains a well” condition relative to separation distance. Also clarifies definition of clean fill appropriate for well abandonment.	While these changes add 6 D/R requirements to persons abandoning private wells, the overall effect is to provide well owners with more options. VDH further anticipates that this will significantly reduce the risk of indirect costs for well owners by virtue of providing more available land area for consideration in the event of necessary onsite sewage system repairs.
12VAC5-630-470 Chlorination dosage rates	Section repealed as unnecessary	Reduces D/R by 22
12VAC5-630-480 Well casing specifications	Section repealed as unnecessary	Reduces D/R by 16

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Word Count	New Word Count	Net Change in Word Count
Private Well Regulations Implementation Manual	8917	0 (Guidance to be rescinded)	-8917
BORA-CARE and Standoff to Wells	282	0 (Guidance to be rescinded)	-282

Borate-based Termiticides and Separation to Wells	317	0 (Guidance to be rescinded)	-317
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*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).