## Office of Regulatory Management

#### **Economic Review Form**

Agency name	Department of Environmental Quality		
Virginia Administrative Code (VAC) Chapter	Not applicable – DEQ guidance document		
citation(s)			
VAC Chapter title(s)	Not applicable – DEQ guidance document		
Action title	Not applicable – DEQ guidance document		
Date this document	September 23, 2024		
prepared			
Regulatory Stage	Rescinding 01-2013, Checklists for Wastewater Laboratory		
(including Issuance of Guidance Documents)	Inspection, and Amendments #1 through #7		
Guidance Documents)	Inspection, and Amendments #1 through #/		

### **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	Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)				
(1) Direct & Indirect Costs & Benefits (Monetized)	This document details only internal procedures and does not interpret existing laws/regulations for the public and therefore should be rescinded as an agency guidance document. The document will be available to the public upon request.				
	Direct Costs: None.				
	Indirect Costs: None.				
	Direct Benefits: This document is a reference for DEQ employees involved in the monitoring of laboratories that utilize EPA-approved procedures to test samples from facilities permitted under a Virginia Pollutant Discharge Elimination System (VPDES) or Virginia Pollution Abatement (VPA) permit. It lists where laboratory checklists can be located on DEQ servers. The appendices list updates to the checklists. It is not a guidance document.  Indirect Benefits: Removal of documents that are not "guidance," as defined in § 2.2-4101 of the Code of Virginia, reduces the burden on stakeholders and the amount and complexity of agency information related to program implementation.				
(2) Present					
Monetized Values	Direct & Indirect Costs (a) \$0	Direct & Indirect Benefits (b) \$0			
	(a) \$0	(6) \$0			
(3) Net Monetized Benefit	\$0				
(4) Other Costs & Benefits (Non- Monetized)	N/A				
(5) Information Sources	N/A				

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

(1) Direct &	Direct Costs: None.
Indirect Costs &	
Benefits	Indirect Costs: None.
(Monetized)	
	Direct Benefits: None.
	Indirect Benefits: None.

(2) Present		
Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non- Monetized)	N/A	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	As the sole alternative is the status quo, this table is not applicable.  Direct Costs: N/A  Indirect Costs: N/A  Direct Benefits: N/A  Indirect Benefits: N/A		
(2) Present Monetized Values	Direct & Indirect Costs (a) N/A	Direct & Indirect Benefits (b) N/A	
(3) Net Monetized Benefit	N/A		
(4) Other Costs & Benefits (Non- Monetized)	N/A		
(5) Information Sources	N/A		

## **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)	This document details only internal procedures and does not interpret existing laws/regulations for the public and therefore should be rescinded as an external guidance document. This document imposes no unique benefit or burden specific to local partners. See Table 1a.  Direct Costs: See Table 1a.  Indirect Costs: See Table 1a.  Indirect Benefits: See Table 1a.  Indirect Benefits: See Table 1a.		
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits	
Wonetized varies	(a) \$0	(b) \$0	
(3) Other Costs & Benefits (Non- Monetized)	\$0		
(4) Assistance	N/A		
(5) Information Sources	N/A		

## **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 &	This document details only internal procedures and does not interpret			
Indirect Costs &	existing laws/regulations for the public and therefore should be rescinded			
Benefits	as an external guidance document. The repeal of this guidance document			
(Monetized)	imposes no unique benefit or burden specific to families. See Table 1a.			
	Direct Costs: See Table 1a.			

	Indirect Costs: See Table 1a.  Direct Benefits: See Table 1a.  Indirect Benefits: See Table 1a.			
(2) Present Monetized Values	Direct & Indirect Costs (a) \$0	Direct & Indirect Benefits (b) \$0		
(3) Other Costs & Benefits (Non- Monetized)	\$0			
(4) Information Sources	N/A			

## **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)	This document details only internal procedures and does not interpret existing laws/regulations for the public and therefore should be rescinded as an external guidance document. The repeal of this guidance document imposes no unique benefit or burden specific to small businesses. See Table 1a.				
	Direct Costs: See Table 1a.				
	Indirect Costs: See Table 1a.				
	Direct Benefits: See Table 1a.				
	Indirect Benefits: See Table 1a.				
(2) Present					
Monetized Values	Direct & Indirect Costs Direct & Indirect Benefits				
	(a) N/A	(b) N/A			

(3) Other Costs & Benefits (Non- Monetized)	N/A
(4) Alternatives	N/A
(5) Information Sources	N/A

#### **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	Authority of	Initial	Additions	Subtractions	Total Net
Section(s)	Change	Count			Change in
Involved*					Requirements
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
	l		l	Grand Total of	(M/A):
				Changes in	(D/A):
				<b>Requirements:</b>	(M/R):
					(D/R):

#### **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
N/A				

#### 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
N/A		

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

Title of Guidance	Original Word	New Word Count	Net Change in
Document	Count		Word Count
01-2013 Checklists	3 pages	Guidance Rescinded	-18 pages
for Wastewater			
Laboratory			
Inspection			
Amendment #1	2 pages		
Amendment #2	3 pages		
Amendment #3	2 pages		
Amendment #4	2 pages		
Amendment #5	2 pages		
Amendment #6	2 pages		
Amendment #7	2 pages		

<sup>\*</sup>If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).