

Office of Regulatory Management
Economic Review Form

Agency name	State Water Control Board
Virginia Administrative Code (VAC) Chapter citation(s)	9VAC25-31 9VAC25-115 9VAC25-151 9VAC25-210 9VAC25-830 9VAC25-890 9VCA25-900
VAC Chapter title(s)	Virginia Pollutant Discharge Elimination System (VPDES) Permit Regulation Virginia Pollutant Discharge Elimination System (VPDES) General Permit Regulation for Seafood Processing Facilities Virginia Pollutant Discharge Elimination System (VPDES) General Permit Regulation for Discharges of Stormwater Associated with Industrial Activity Virginia Water Protection Permit Regulation Chesapeake Bay Preservation Area Designation and Management Regulations Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s) Certification of Nonpoint Source Nutrient Credits
Action title	Citation updates in response to consolidation of Stormwater regulations and revisions to the Code of Virginia
Date this document prepared	May 23, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Final Exempt

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>Background: This is a final exempt regulatory action. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter (9VAC25-875) and changes necessary to conform to changes to state law that become effective July 1, 2024. (Chapters 68 and 758 of the 2016 Acts of Assembly).</p> <p>Direct Costs: N/A. There are no new direct costs associated with these corrections of technical errors and updates to conform to changes to state law.</p> <p>Indirect Costs: N/A. There are no new indirect costs associated with these corrections of technical errors and updates to conform to changes to state law.</p> <p>Direct Benefits: These amendments will benefit the regulated community and avoid confusion concerning the location of applicable stormwater requirements.</p> <p>Indirect Benefits: N/A. There are no new indirect benefits associated with these corrections of technical errors and updates to conform to changes to state law.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) Indeterminate direct benefits by reducing confusion concerning the location of applicable stormwater requirements.</p>
<p>(3) Net Monetized Benefit</p>	<p>Indeterminate but clearly positive.</p>	

(4) Other Costs & Benefits (Non-Monetized)	These amendments will benefit the regulated community and avoid confusion concerning the location of applicable stormwater requirements. Benefits are unable to be monetized but are clearly positive.
(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>This is a final exempt regulatory action. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter and changes necessary to conform to changes to state law.</p> <p>Direct Costs: Unable to monetize costs to regulated community associated with confusion concerning state law and incorrect regulatory references.</p> <p>Indirect Costs: Unable to monetize costs to regulated community associated with confusion concerning state law and incorrect regulatory references.</p> <p>Direct Benefits: None. Maintaining the status quo does not benefit the regulated community or the agency.</p> <p>Indirect Benefits: None. Maintaining the status quo does not benefit the regulated community or the agency.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Indeterminate.	(b) None.
(3) Net Monetized Benefit	Indeterminate but clearly negative.	
(4) Other Costs & Benefits (Non-Monetized)	Maintaining the Status Quo would mean the current regulations are not as clear as they could be because they contain outdated citations and are not consistent with state law.	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>This is a final exempt regulatory action. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter and changes necessary to conform to changes to state law.</p> <p>Direct Costs: N/A</p> <p>Indirect Costs: N/A</p> <p>Direct Benefits: N/A</p> <p>Indirect Benefits: N/A</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(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)	<p>This is a final exempt regulatory action. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter and changes necessary to conform to changes to state law.</p> <p>Direct Costs: See table 1a.</p> <p>Indirect Costs: See table 1a.</p> <p>Direct Benefits: See table 1a.</p>	
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	Indirect Benefits: See table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) See table 1a.	(b) See table 1a.
(3) Other Costs & Benefits (Non-Monetized)	See table 1a.	
(4) Assistance	See table 1a.	
(5) Information Sources	See table 1a.	

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>This is a final exempt regulatory action does not impact families. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter and changes necessary to conform to changes to state law.</p> <p>Direct Costs: N/A</p> <p>Indirect Costs: N/A</p> <p>Direct Benefits: N/A</p> <p>Indirect Benefits: N/A</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) See table 1a.	(b) See table 1a.

(3) Other Costs & Benefits (Non-Monetized)	See table 1a.
(4) Information Sources	See table 1a.

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)	<p>This is a final exempt regulatory action. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter and changes necessary to conform to changes to state law.</p> <p>Direct Costs: See table 1a.</p> <p>Indirect Costs: See table 1a.</p> <p>Direct Benefits: See table 1a.</p> <p>Indirect Benefits: See table 1a.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) See table 1a.	(b) See table 1a.
(3) Other Costs & Benefits (Non-Monetized)	See table 1a.	
(4) Alternatives	See table 1a.	
(5) Information Sources	See table 1a.	

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
9VAC25-31-950	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-31-960	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-31-970	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	3	0	0	0
	(D/R):	0	0	0	0
9VAC25-31-980	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	0	0
	(D/R):	0	0	0	0
9VAC25-31-1010	(M/A):	5	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	0	0
	(D/R):	0	0	0	0
9VAC25-31-1020	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	4	0	0	0
	(D/R):	0	0	0	0
9VAC25-31-1030	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-115-50	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0

9VAC25-151-60	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-151-70	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-210-60	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	18	0	0	0
	(D/R):	0	0	0	0
9VAC25-830-40	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-830-130	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	6	0	0	0
	(D/R):	0	0	0	0
9VAC25-830-140	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	6	0	0	0
	(D/R):	0	0	0	0
9VAC25-830-150	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	0	0
	(D/R):	0	0	0	0
9VAC25-890-1	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-890-20	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-890-30	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
	(M/A):	0	0	0	0

9VAC25-890-40	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-900-10	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
9VAC25-900-40	(M/A):	1	0	0	0
	(D/A):	3	0	0	0
	(M/R):	7	0	0	0
	(D/R):	2	0	0	0
9VAC25-900-60	(M/A):	1	0	0	0
	(D/A):	5	0	0	0
	(M/R):	1	0	0	0
	(D/R):	5	0	0	0
9VAC25-900-90	(M/A):	1	0	0	0
	(D/A):	18	0	0	0
	(M/R):	0	0	0	0
	(D/R):	2	0	0	0
9VAC25-900-100	(M/A):	0	0	0	0
	(D/A):	10	0	0	0
	(M/R):	0	0	0	0
	(D/R):	17	0	0	0
9VAC25-900-110	(M/A):	0	0	0	0
	(D/A):	22	0	0	0
	(M/R):	0	0	0	0
	(D/R):	22	0	0	0
9VAC25-900-120	(M/A):	0	0	0	0
	(D/A):	1	0	0	0
	(M/R):	7	0	0	0
	(D/R):	116	0	0	0
9VAC25-900-230	(M/A):	0	0	0	0
	(D/A):	4	0	0	0
	(M/R):	0	0	0	0
	(D/R):	14	0	0	0
				Grand Total of Changes in Requirements:	(M/A): 0
					(D/A): 0
					(M/R): 0
					(D/R): 0

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

Agency note: This is a final exempt regulatory action. No changes are proposed other than corrections of technical errors (updating citation references) in applicable State Water Control Board regulations as a result of the consolidation of the stormwater regulations into a single chapter and changes necessary to conform to changes to state law.

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
		These amendments will benefit the regulated community and avoid confusion concerning the location of applicable stormwater requirements. Benefits are indeterminate but clearly positive.

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
N/A			

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