

Office of Regulatory Management
Economic Review Form

Agency name	Board for Waste Management Facility Operators
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 155-20
VAC Chapter title(s)	Waste Management Facility Operators Regulations
Action title	General Regulatory Reduction Initiative
Date this document prepared	May 1, 2024 (revised July 19, 2024, January 3, 2025, and February 13, 2025)
Regulatory Stage (including Issuance of Guidance Documents)	Final (Action 6166 / Stage 10643)

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>1. Under the proposed change, individuals seeking to qualify for a waste management facility operator license could qualify with six (6) months of experience in the license class (Class I, Class II, Class III, or Class IV) instead of the current requirement of one (1) year. The change reduces the current experience requirement by 50%.</p> <p>2. Under the proposed change, licensed individuals would need to complete six (6) hours of continuing education per license cycle in order to renew a license, instead of the current requirement of eight (8) hours.</p> <p>3. Under the proposed change, education course providers would need to retain records for all course participants for a period of five (5) years, instead of the current requirement of 10 years.</p> <p>Direct Costs: There are no additional monetizable direct costs associated with the regulatory change.</p> <p>Indirect Costs: There are no additional monetizable indirect costs associated with the regulatory change.</p> <p>Direct Benefits:</p> <ul style="list-style-type: none"> • Reduction of the experience requirement could potentially allow individuals to enter the profession as much as six months earlier than currently allowed in the regulation (contingent upon passing the license examination). Such individuals may be able to earn income as a licensed professional sooner. <ul style="list-style-type: none"> ○ On average, the Board approves about 70 individuals per year to sit for the license examination. Such individuals must meet the training and experience requirements in the regulation in order to qualify for the license examination. ○ The Board estimates that the reduced experience requirement will result in a 25% increase per year in the number of individuals who would be approved for the license examination (approximately 18 additional individuals per year.) ○ The median monthly salary for waste management workers is \$3,640. ○ An individual who qualifies based on the reduced experience requirement could earn up to \$21,840 over a period of six months. ○ Number of additional qualifying individuals x salary over six months: \$393,120.
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	<ul style="list-style-type: none"> • The reduced continuing education requirement will allow licensees to save two hours of time every license cycle (two years) and benefit. <ul style="list-style-type: none"> ○ As of March 1, 2024, there are 599 licensed waste management facility operators. ○ Number of licensees x number of hours saved per two-year cycle: 1,198 hours. ○ Hourly wage for waste management facility operator: \$21 per hour. ○ Number of hours saved every two years x hourly wage: \$25,158. <p>Indirect Benefits: There are no additional monetizable indirect benefits associated with the regulatory change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0 (over five years)	(b) \$1,901,834 (over five years)
(3) Net Monetized Benefit	\$1,901,834 (over five years)	
(4) Other Costs & Benefits (Non-Monetized)	<p>Costs: There are no additional non-monetizable costs associated with the regulatory change.</p> <p>Benefits:</p> <ul style="list-style-type: none"> • The reduced continuing education requirement will allow licensees to save two hours of time every license cycle (two years). As of March 1, 2024, there are 599 licensed waste management facility operators. This amounts to a time savings of 1,198 hours for licensees. • Education course providers will be able to save on costs associated with keeping records for course participants. 	
(5) Information Sources	<ol style="list-style-type: none"> 1. Licensing records of the Board for Waste Management Facility Operators. 2. Talent.com - Waste Management: Average Salary in Virginia in 2024. (Accessed – 4/2/24) 	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no additional monetizable direct costs associated with maintaining the status quo.</p> <p>Indirect Costs: There are no additional monetizable indirect costs associated with maintaining the status quo.</p> <p>Direct Benefits: There are no additional monetizable direct benefits associated with maintaining the status quo.</p> <p>Indirect Benefits: There are no additional monetizable indirect benefits associated with maintaining the status quo.</p>	
(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)	There are no additional non-monetizable costs or benefits associated with maintaining the status quo.	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	See Box #4.	
(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)	No less intrusive or less costly alternatives to achieve the purpose of the regulatory change were identified.	

(5) Information Sources	N/A
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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)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>Costs: There are no additional costs to local partners associated with this regulatory change.</p> <p>Benefits:</p> <ul style="list-style-type: none"> • Many waste management facilities are owned or operated by localities. Facility owners may provide their licensed operators with continuing education training. Such facility owners would likely benefit from the reduced record retention requirement in terms of costs associated with keeping records. • Such facility owners would also likely experience benefits in the form of reduced costs and additional productive time for employees as a result of the reduced continuing education requirement. 	
(4) Assistance	N/A	
(5) Information Sources	Board for Waste Management Facility Operators program staff.	

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)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated costs or benefits to families associated with this regulatory change.	
(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)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	Licenses issued under this regulation are issued to individuals, and not to business entities. However, many licensees are likely employees of business entities that meet the definition of "small business" in § 2.2-4007.1 of the Code of Virginia. The costs and benefits of this regulatory change are identified in Table 1(a). Most employers in this industry pay for the costs associated with	

	the obtaining and maintaining of licenses held by their employees. To the extent that any additional costs or benefits are assumed by small business entities that employ licensees, this regulatory change would impact small businesses.
(4) Alternatives	No less intrusive or less costly alternatives to achieve the purpose of the regulatory change were identified.
(5) Information Sources	Board for Waste Management Facility Operators program staff.

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
20-40	(M/A):	0	0	0	0
	(D/A):	2	0	0	0
	(M/R):	0	0	0	0
	(D/R):	3	0	1	-1
20-110	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	3	0	1	-1
20-120	(M/A):	1	0	0	0
	(D/A):	3	0	2	-2
	(M/R):	0	0	0	0
	(D/R):	10	0	1	-1
20-130	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	1	-1
20-190	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	7	0	2	-2
20-210	(M/A):	0	0	0	0
	(D/A):	2	0	2	-2
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
20-280	(M/A):	1	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	1	-1
20-285	(M/A):	0	0	0	0
	(D/A):	2	0	2	-2
	(M/R):	0	0	0	0
	(D/R):	10	0	1	-1

Grand Total of Changes in Requirements:	(M/A): 0
	(D/A): -6
	(M/R): 0
	(D/R): -8

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
20-120 20-160	This action (i) reduces the minimum required experience to qualify for licensure from one (1) year to six (6) months; and (ii) reduces required continuing education hours for license renewal from eight (8) hours to six (6) hours. This is expected to result in (i) increased earnings for individuals who become initially licenses; and (ii) savings for current licensees.	N/A	N/A	The change results in a 50% reduction of the burden of the D/R requirements for these sections. There are 10 D/R requirements in section -120; and three (3) D/R requirements in section -160. This results in a reduction of 6.5 D/R requirements.

	The estimated net benefit annually is \$380,367.			
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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
20-120	The experience requirement for an individual to qualify for licensure is reduced from one (1) year to six (6) months.	Individuals are able to qualify for licensure sooner due to the reduced experience requirement. The change reduces the experience requirement by 50%. The change applies to one D/R requirement in the section, resulting in a reduction of .5 D/R requirements.
20-120	The criminal conviction reporting requirements for applicants are reduced. Applicants must disclose any non-marijuana misdemeanor within the last three (3) years and any felon within the last 10 years. Currently, applicants are required to disclose any non-marijuana misdemeanor and any felony.	Individuals with older criminal histories – non-marijuana misdemeanors more than three years old or felony convictions more than 10 years old – can receive a license without the need for the Board to review the applicant’s criminal history to approve an applicant for licensure. This change reduces the stringency of the current requirement by 50%. The change applies to one D/R requirement in the section, resulting in a reduction of .5 D/R requirements.
20-160	The final regulation reduces the number of continuing education hours required for renewal of a license from eight (8) hours per license cycle (every two years) to six (6) hours per license cycle.	The change reduces the regulatory burden on individuals seeking to renew their licenses. The continuing education requirement is reduced by 25%.

		The change applies to one D/R requirement in the section resulting in a reduction of .25 D/R requirements.
20-220	The final regulation amends the application requirements for training course providers to require the applicant provide the Board with contact information for the provider, rather than specifically a telephone number.	<p>This change allows training providers to furnish other types of contact information, such as an email address, as contact information.</p> <p>This change reduces the stringency of the current requirement by 33%.</p> <p>This change applies to one D/R requirement in the section resulting in a reduction of .33 D/R requirements.</p>
20-230 20-235	The final regulation reduces the record retention requirement for Board-approved providers of education courses from a requirement of 10 years to a requirement of five (5) years.	<p>The change reduces the regulatory burden on education course providers. The record retention requirement is reduced by 50%</p> <p>The change applies to one D/R requirement in section -230; and one D/R requirement in section -235, resulting in a total reduction of 1 D/R requirement.</p>

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	N/A	N/A	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).