

Office of Regulatory Management
Economic Review Form

Agency name	Department of Environmental Quality
Virginia Administrative Code (VAC) Chapter citation(s)	Not applicable – DEQ guidance document
VAC Chapter title(s)	Not applicable – DEQ guidance document
Action title	Not applicable – DEQ guidance document
Date this document prepared	September 23, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Rescinding GM11-2010, Process for Determination of Noncompliance with the General VPDES Permit for Storm Water Discharges Associated with Industrial Activity, VAR05

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>This document provides internal technical and procedural information to Department of Environmental Quality (DEQ) staff regarding the issuance of Warning Letters or Notices of Violation for alleged violations of the General VPDES Permit for Storm Water Discharges Associated with Industrial Activity (a/k/a Storm Water Industrial General Permit or SWI GP). It has been replaced by GM15-2001, but it has not been removed from Town Hall. The document should be rescinded as an agency guidance document. It will be available to the public upon request.</p> <p>Direct Costs: None.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: This document served as a reference for DEQ compliance auditors, providing them with statewide procedures that promote Regional Office consistency when processing compliance information. It defined and set benchmark standards for the Regional Offices to process compliance information and served as a reference for new staff in the correct procedures for administering the compliance program.</p> <p>Indirect Benefits: Removal of documents that are strictly procedural for the agency reduces the burden on stakeholders and the amount and complexity of agency information related to program implementation.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) \$0</p>
<p>(3) Net Monetized Benefit</p>	<p>\$0</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>N/A</p>	
<p>(5) Information Sources</p>	<p>N/A</p>	

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: None.</p> <p>Indirect Costs: None.</p>	
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	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	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 document details internal procedures. It does not interpret existing laws/regulations as they apply to the public and therefore should be rescinded as an agency guidance document. This document imposes no unique benefit or burden specific to local partners. See Table 1a.</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) \$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 & Indirect Costs & Benefits (Monetized)	<p>This document details internal procedures. It does not interpret existing laws/regulations as they apply to the public and therefore should be rescinded as an external guidance document. The repeal of this document imposes no unique benefit or burden specific to families. See Table 1a.</p>
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	<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) \$0	(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)	<p>This document details internal procedures. It does not interpret existing laws/regulations as they apply to the public and therefore should be rescinded as an external guidance document. The repeal of this document imposes no unique benefit or burden specific to small businesses. See Table 1a.</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) 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 Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
Grand Total of Changes in Requirements:					(M/A):
					(D/A):
					(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 Document	Original Word Count	New Word Count	Net Change in Word Count
GM11-2010 Process for Determination of Noncompliance with the General VPDES Permit for Storm Water Discharges Associated with Industrial Activity, VAR05	7 pages	Guidance Rescinded	-7 pages

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