



COMMONWEALTH of VIRGINIA
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MEMORANDUM

To: C. Ray Davenport
Commissioner of Labor and Industry

From: William A. Diamond
Assistant Attorney General

Date: August 13, 2004

Subject: Proposed Regulations – Financial Responsibility of Boiler and Pressure Vessel Contract
Fee Inspectors

At your request, I have reviewed the proposed Financial Responsibility of Boiler and Pressure Vessel Contract Fee Inspectors regulations, Sections 16 VAC 25-55-10 and 20 of the Virginia Administrative Code.

In my view, as counsel to your agency, the Safety and Health Codes Board possesses the statutory authority to promulgate the aforesaid regulations under §§ 40.1-51.6 and 51.9:2 of the Code of Virginia.