

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Department of Environmental Quality
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	Not applicable – DEQ guidance document
<b>VAC Chapter title(s)</b>	Not applicable – DEQ guidance document
<b>Action title</b>	Not applicable – DEQ guidance document
<b>Date this document prepared</b>	September 23, 2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Rescinding 00-2016, Chain of Custody Policy and Procedure

**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)**

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>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only internal procedures and does not interpret existing laws/regulations for the public and therefore should be rescinded as an agency guidance document.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.</p> <p><b>Direct Costs:</b> None.</p> <p><b>Indirect Costs:</b> None.</p> <p><b>Direct Benefits:</b> The document is an internal standard operating procedure (SOP) that describes how all environmental samples will be collected using the chain of custody procedures outlined in the document to ensure the integrity of samples, so they can be used as admissible evidence to enforce the Commonwealth’s environmental laws and regulations. It also states the laboratories to which samples may be taken for processing. The document states that it is an internal SOP. It does not interpret any state or federal laws or regulations. The SOP is out of date (it was created in 2006) and no longer used internally, in part due to changing Department of General Services and procurement requirements.</p> <p><b>Indirect Benefits:</b> 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.</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)	N/A	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits	<p><b>Direct Costs:</b> None.</p> <p><b>Indirect Costs:</b> None.</p>	
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Benefits (Monetized)	<b>Direct Benefits:</b> None.  <b>Indirect Benefits:</b> 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.  <b>Direct Costs:</b> N/A  <b>Indirect Costs:</b> N/A  <b>Direct Benefits:</b> N/A  <b>Indirect Benefits:</b> 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 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.</p> <p><b>Direct Costs:</b> See Table 1a.</p> <p><b>Indirect Costs:</b> See Table 1a.</p> <p><b>Direct Benefits:</b> See Table 1a.</p> <p><b>Indirect Benefits:</b> 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 &	<p>This document details only internal procedures and does not interpret existing laws/regulations for the public and therefore should be rescinded</p>
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Benefits (Monetized)	<p>as an external guidance document. The repeal of this guidance document imposes no unique benefit or burden specific to families. See Table 1a.</p> <p><b>Direct Costs:</b> See Table 1a.</p> <p><b>Indirect Costs:</b> See Table 1a.</p> <p><b>Direct Benefits:</b> See Table 1a.</p> <p><b>Indirect Benefits:</b> 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 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.</p> <p><b>Direct Costs:</b> See Table 1a.</p> <p><b>Indirect Costs:</b> See Table 1a.</p> <p><b>Direct Benefits:</b> See Table 1a.</p> <p><b>Indirect Benefits:</b> 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):				
<b>Grand Total of Changes in Requirements:</b>					(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)*

<b>Title of Guidance Document</b>	<b>Original Word Count</b>	<b>New Word Count</b>	<b>Net Change in Word Count</b>
00-2016 Chain of Custody Policy and Procedure	12 pages	Guidance Rescinded	-12 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).