



COMMONWEALTH of VIRGINIA
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MEMORANDUM

FROM: Ross Phillips
Senior Assistant Attorney General

TO: Michael Rolband, Director
Department of Environmental Quality

DATE: April 17, 2023

RE: Periodic Review of Chapter 9 VAC 25-101 Tank Vessel Oil Discharge Contingency
Plan and Financial Responsibility Regulation

Please note that this memorandum does not constitute an opinion, formal or informal, of the Attorney General. Rather, this memorandum contains the legal analysis of the individual staff member providing it.

I have reviewed the above-referenced regulations and find they are within the statutory authority of the State Water Control Board pursuant to §§ 62.1-44.15, 62.1-44.34:16, and 62.1-44.34:21 of the Code of Virginia.