Office of Regulatory Management

Economic Review Form

Agency name	Virginia Board for Asbestos, Lead, and Home Inspectors
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 15-30
VAC Chapter title(s)	Lead-Based Paint Activities Regulations
Action title	Lead Regulation Amendment to Comport with Changes to 40 CFR Part 745
Date this document prepared	May 18, 2026
Regulatory Stage (including Issuance of Guidance Documents)	Exempt Final (Action 7018 / Stage 11187)

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)	The Virginia Board for Asbestos, Lead, and Home Inspectors ("the Board") is amending the Lead-Based Paint Activities Regulations to comport with recent changes to 40 CFR Part 745, which provides for federal regulations governing lead-based paint activities, including the identification and abatement of lead-based paint hazards. As mandated by the Code of Virginia, the regulations of the Board must be consistent with, but not more stringent than, standards for performing lead-based paint activities established by the United States Environmental Protection Agency ("EPA"). The recent changes to the EPA lead-based paint standards (i) reduce the level of lead in dust that is considered dangerous; and (ii) lower the amount of lead that can remain in dust on floors, window sills, and window troughs following a lead paint abatement. The Board's amendments to the regulation include: • Replacing the term "clearance levels" with "action levels" thorough the regulation. • Revising rules regarding the determination of when a dust-lead hazard is present, including specifying that a hazard is present when amount of dust-lead meets a "reportable level" as defined in the regulation. • Revising rules regarding abatement of dust-lead hazards to provide that dust-lead levels following an abatement must be below action level amounts specified by EPA. • Revising abatement report standards to include a required disclosure when post-abatement dust-lead testing levels are below dust-lead action levels, but at or above dust-lead reportable levels. • Various technical changes. Direct Costs: There are no new monetizable direct costs associated with the regulatory change. Indirect Costs: There are no new monetizable indirect costs associated with the regulatory change. Direct Benefits: There are no new monetizable direct benefits associated with the regulatory change. Indirect Benefits: There are no new monetizable indirect benefits associated with the regulatory change.

(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)	Costs: • The abatement of lead-based paint dust hazards to meet the new, lower action levels may entail additional costs to contractors that perform abatement of lead-based paint. These additional costs could be passed on to consumers that utilize the services of lead contractors. • Approved accredited lead training program providers will be required to revise their training program materials and submit these revised training materials to the Board for review and approval. Training providers will likely assume time and administrative costs to comply. Benefits: • The regulatory change will ensure that the Board is in compliance with the mandate established by the General Assemlby that the Board's regulations are consistent with, but not more stringent, than the federal regulations governing lead-based paint activities established by the EPA. • Requiring that abatement of dust-lead hazards meet the new, lower action levels established by EPA should reduce dust-lead related risks to children in target housing and child-occupied facilities. • Providers of accredited lead training programs will be in compliance with current training standards.	
(5) Information Sources	Agency staff.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no additional monetizable direct costs associated with maintaining the status quo. Indirect Costs: There are no additional monetizable indirect costs associated with maintaining the status quo.

	Direct Benefits: There are no additional monetizable direct benefits associated with maintaining the status quo. Indirect Benefits: There are no additional monetizable indirect benefits associated with maintaining the status quo.	
(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)	Costs: • By maintaining the status quo, the Board will be out of compliance with the General Assemlby's mandate that the Board's regulations be consistent with the federal regulations governing lead-based paint activities established by the EPA. • Maintaining the status quo may result in confusion among lead contractors as to the standards for dust-lead hazard identification and abatement in Virginia. • Maintaining the status quo could potentially expose Virginia lead contractors and providers of accredited lead training programs to liability in the event of non-compliance with the revised EPA standards.	
(5) Information Sources	Agency staff.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Refer to 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 viable alternatives were considered as this regulatory change is needed to ensure the Board meets federal and state requirements for lead-based paint activities.
(5) Information Sources	Agency staff.

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)	Refer to 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 identifiable costs or benefits to local partners resulting from the regulatory change.	
(4) Assistance	N/A	
(5) Information Sources	Agency 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)	Refer to 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 identifiable costs or benefits to families resulting from the regulatory change.	
(4) Information Sources	Agency staff.	

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)	Refer to Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	Lead contractor licenses and accredited lead training program approvals are issued to business entities. Many of these business entities are likely to fall within the meaning of "small business" as that term is defined in the Administrative Process Act (§ 2.2-4000 et seq. of the Code of Virginia). Other licenses issued by the Board are issued to individuals. Many of these individuals are likely to be owners or employees of business entities that meet the definition of "small business." The costs and benefits of this regulatory change are described in Table 1(a) of this form. To the extent that these costs and benefits apply to business entities, these costs and benefits would apply to small businesses.	
(4) Alternatives	No viable alternatives were considered as this regulatory change is needed to ensure the Board meets federal and state requirements for lead-based paint activities.	

(5) Information Sources	Agency 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
N/A	**(M/A):**	N/A	N/A	N/A	N/A
	(D/A):	N/A	N/A	N/A	N/A
	(M/R):	N/A	N/A	N/A	N/A
	(D/R):	N/A	N/A	N/A	N/A
				Grand Total of Changes in Requirements:	**(M/A): N/A**
					(D/A): N/A
					(M/R): N/A
					(D/R): N/A

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	N/A	N/A	N/A	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	N/A	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
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).