

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Waste Management Board
Virginia Administrative Code (VAC) Chapter citation(s)	9 VAC 20-110
VAC Chapter title(s)	Regulations Governing the Transportation of Hazardous Materials
Action title	Annual Update 2025
Date this document prepared	November 24, 2025
Regulatory Stage (including Issuance of Guidance Documents)	Exempt Final Action

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.

Agency Note: This is a final exempt regulatory action necessary to conform to changes in federal regulations. Therefore, Table 1c is not required and has been removed.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Background: All the changes to the regulations are federally mandated and the agency is not exercising any discretion. The amendment to 9VAC20-110 is necessary to conform to changes to the federal regulations regarding the transportation of hazardous materials in Title 49 of the Code of Federal Regulations (49 CFR). As 9VAC20-110 incorporates certain parts of 49 CFR, it is necessary to amend 9VAC20-110-110 in order to incorporate the federal changes.</p> <p>Direct Costs: There are no direct costs associated with the adoption of this regulatory change. The Annual Update of the Virginia Regulations Governing the Transportation of Hazardous Materials is necessary to conform to changes in federal regulations which are currently in place. Members of the regulated community must comply with these changes whether or not the Commonwealth adopts the amendments, but adoption of the amendments enables the Commonwealth to continue implementing and enforcing this program.</p> <p>Indirect Costs: There are no indirect costs associated with the adoption of this regulatory change.</p> <p>Direct Benefits: The adoption of this regulatory change is necessary for the Virginia State Police to implement and enforce the changes in federal requirements governing the transportation of hazardous materials.</p> <p>Indirect Benefits: The primary indirect benefit will be that the Virginia State Police will continue to implement and enforce the requirements governing the transportation of hazardous materials as mandated by changes to the Code of Federal Regulations.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) Indeterminate but positive.</p>
<p>(3) Net Monetized Benefit</p>	<p>Indeterminate but positive.</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>\$0</p>	
<p>(5) Information Sources</p>	<p>Section 49 of the CFR</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: There are no direct costs associated with maintaining the regulations as currently written. However, the regulations would then be inconsistent with the federal regulations and the Virginia State Police would not be able to implement and enforce the current requirements governing the transportation of hazardous materials as mandated by changes to the Code of Federal Regulations.</p> <p>Indirect Costs: Inconsistency between the federal and Virginia regulations could also create regulatory confusion.</p> <p>Direct Benefits: There are no direct benefits associated with maintaining the regulations as currently written.</p> <p>Indirect Benefits: There are no indirect benefits associated with maintaining the regulations as currently written.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) Indeterminate but negative.</p>	<p>(b) \$0</p>
<p>(3) Net Monetized Benefit</p>	<p>Indeterminate but negative.</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>\$0</p>	
<p>(5) Information Sources</p>	<p>See Table 1a.</p>	

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: There are no unique direct costs to local partners from the adoption of this regulatory change.</p> <p>Indirect Costs: There are no unique indirect costs to local partners from the adoption of this regulatory change.</p> <p>Direct Benefits: There are no unique direct benefits to local partners from the adoption of this regulatory change.</p> <p>Indirect Benefits: The primary indirect benefit will be that the current requirements governing the transportation of hazardous materials will continue to be implemented and enforced by the Virginia State Police.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) See Table 1a.</p>	<p>(b) See Table 1a.</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>	<p>See Table 1a.</p>	
<p>(4) Assistance</p>	<p>Not applicable.</p>	
<p>(5) Information Sources</p>	<p>See Table 1a.</p>	

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>Direct Costs: Families are not affected by the adoption of this regulatory change.</p> <p>Indirect Costs: Families are not affected by the adoption of this regulatory change.</p> <p>: Families are not affected by the adoption of this regulatory change.</p> <p>Indirect Benefits: Families are not affected by the adoption of this regulatory change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Not applicable.	(b) Not applicable.
(3) Other Costs & Benefits (Non-Monetized)	Not applicable.	
(4) Information Sources	See Table 1a.	

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>Direct Costs: There are no unique direct costs to small businesses. See Table 1a.</p> <p>Indirect Costs: There are no unique indirect costs to small businesses. See Table 1a.</p> <p>Direct Benefits: There are no unique direct benefits to small businesses. See Table 1a.</p> <p>Indirect Benefits: There are no unique indirect benefits to small businesses. See Table 1a.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) See Table 1a.	(b) See Table 1a.
(3) Other Costs & Benefits (Non-Monetized)	See Table 1a.	
(4) Alternatives	Not applicable.	
(5) Information Sources	See Table 1a.	

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.

Agency Note: This regulatory amendment does not place any additional regulatory requirements on the regulated community. Rather it provides the mechanism for the continued implementation and enforcement by the Virginia State Police of regulations governing the transportation of hazardous materials.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
9VAC20-110-110	(M/A):	1	N/A	N/A	0
	(D/A):	0	N/A	N/A	0
	(M/R):	0	N/A	N/A	0
	(D/R):	0	N/A	N/A	0
				Grand Total of Changes in Requirements:	(M/A):0 (D/A): 0 (M/R): 0 (D/R): 0

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
Not applicable.				

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

Not applicable.		

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
Not applicable.			

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