Office of Regulatory Management Economic Review Form

Agency name	Department of Environmental Quality		
Virginia Administrative Code (VAC) Chapter citation(s)			
VAC Chapter title(s)	Not applicable – DEQ guidance document		
Action title	Not applicable – DEQ guidance document		
Date this document prepared	September 20, 2024		
Regulatory Stage (including Issuance of Guidance Documents)	Closure Guidance Fact Sheet - Wood Treatment Facilities - Drip Pads (LPR-HW)		

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(1) Direct & Indirect Costs & Benefits (Monetized)	Background: This 2007 document is out of date. Direct Costs: Rescinding the guidance document does not introduce any changes that would present any direct costs. Indirect Costs: Rescinding the guidance document does not introduce any changes that would present any indirect costs. Direct Benefits: Increases clarity due to the removal of a document that is out of date and no longer relevant. Indirect Benefits: None.		
(2) Present Monetized Values	Direct & Indirect Costs (a) \$0 (b) N/A		
(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 (Monetized)	Direct Costs: N/A Indirect Costs: N/A Direct Benefits: N/A Indirect Benefits: 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	

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

(1) Direct & Indirect Costs &	Direct Costs: N/A		
Benefits	Indirect Costs: N/A		
(Monetized)	Direct Benefits: N/A		
	Indirect Benefits: N/A		
(2) Present			
Monetized Values	Direct & Indirect Costs Direct & Indirect Benefits		
	(a) N/A (b) N/A		
(3) Net Monetized	N/A		
Benefit			
(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)	The repeal of this guidance document imposes no unique benefit or burden specific to local partners. See Table 1a. Direct Costs: See Table 1a. Indirect Costs: See Table 1a. Direct Benefits: See Table 1a.		
	Indirect Benefits: See Table 1a.		
(2) Present Monetized Values	Direct & Indirect Costs (a) N/A (b) N/A		
(3) Other Costs & Benefits (Non- Monetized)	N/A		
(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

Tuble of Impact of				
(1) Direct & Indirect Costs &	The repeal of this guidance document imposes no unique benefit or burden specific to families. See Table 1a.			
Benefits				
(Monetized)	Direct Costs: See Table 1a.			
	Indirect Costs: See Table 1a.			
	Direct Benefits: See Table 1a.			
	Indirect Benefits: See Table 1a.			
(2) Present				
Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits		
Wionetized values				
	(a) N/A (b) N/A			
(3) Other Costs &	er Costs & N/A			
Benefits (Non-	1771			
Monetized)				
Wionetized)				
(4) Information	N/A			
Sources				
Bources				

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 &	The repeal of this guidance document imposes no unique benefit or		
Indirect Costs &	burden specific to small businesses. See Table 1a.		
Benefits			
(Monetized)	Direct Costs: See Table 1a.		
	Indirect Costs: See Table 1a.		
	Direct Benefits: See Table 1a.		
	Indirect Benefits: See Table 1a.		
(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):				
				Grand Total	(M/A):
				of Changes in	(D/A):
				Requirements:	(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)

	() 11			
VAC Section(s)	Description of	Initial Cost	New Cost	Overall Cost
Involved*	Regulatory			Savings/Increases
	Requirement			
N/A				

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s)	Description of Regulatory	Overview of How It Reduces
VIIC Section(s)	Description of Regulatory	Over view of flow it Reduces

Involved*	Change	or Increases Regulatory Burden
N/A		

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance	Original Word	New Word Count	Net Change in
Document	Count		Word Count
Closure Guidance Fact	1 page	Guidance Rescinded	1 page
Sheet - Wood Treatment			
Facilities - Drip Pads			
(LPR-HW)			

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