

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>	October 30, 2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	<p>Rescinding State Water Control Board Guidance Memos:</p> <ul style="list-style-type: none"> <li>- Guidance Memo No. 93-026, Permitting Strategy for Wood Preserving Operations, and Guidance Memo No. 93-026 Amendment No. 1</li> <li>- Guidance Memo No. 00-2015, Implementation Guidance for July 2000 Revisions to the VPDES Permit Regulation</li> <li>- Guidance Memo No. 01-2007, Implementation Guidance for December 2000 Revisions to the VPDES Permit Regulation</li> <li>- GM03-2003, Interpretation for Water Monitoring of GM00-2016 – Chain of Custody Policy and Procedure – Amendment 1</li> </ul>

### 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)**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p><b>Background:</b></p> <p>This action will rescind the following guidance documents relevant to the State Water Control Board:</p> <ul style="list-style-type: none"> <li>- Guidance Memo No. 93-026, Permitting Strategy for Wood Preserving Operations, and Guidance Memo No. 93-026 Amendment No. 1</li> <li>- Guidance Memo No. 00-2015, Implementation Guidance for July 2000 Revisions to the VPDES Permit Regulation</li> <li>- Guidance Memo No. 01-2007, Implementation Guidance for December 2000 Revisions to the VPDES Permit Regulation</li> <li>- GM03-2003, Interpretation for Water Monitoring of GM00-2016 – Chain of Custody Policy and Procedure – Amendment 1</li> </ul> <p><b>Direct Costs:</b> None.</p> <p><b>Indirect Costs:</b> None.</p> <p><b>Direct Benefits:</b></p> <p>Guidance Memo No. 93-026, issued in December 1993, and Amendment No. 1, issued October 1994; Guidance Memo No. 00-2015, issued in July 2000; and Guidance Memo No. 01-2007, issued in January 2001, are all out of date, many of the citations and cross-references are incorrect, and the guidance in each is no longer needed. Current versions of forms that are in the guidance documents are available in more recent guidance or included as documents incorporated by reference with the respective regulations. Current permitting procedures and templates are provided in other more recent DEQ guidance documents.</p> <p>GM03-2003 clarifies an internal standard operating procedure (GM00-2016, issued in 2000) that is out of date and no longer used internally, in part due to changing Department of General Services and procurement requirements. GM00-2016 is being rescinded so GM03-2013 is no longer needed.</p> <p>All of the guidance documents are out of date and some contain forms and templates that have been replaced. One, GM03-2003, details internal agency procedures. Removing out of date information and procedural documents that are only applicable to the agency, not the public, reduces confusion within the agency and regulated community. Therefore, these documents should be removed as agency guidance.</p>
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	<b>Indirect Benefits:</b> Removal of documents that are outdated and no longer relevant, or purely procedural, reduces the amount of information that stakeholders have to search through to get current, relevant information about the implementation of DEQ’s programs.	
(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 (Monetized)	<b>Direct Costs:</b> None. <b>Indirect Costs:</b> None. <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)	These documents are out of date or detail internal procedures. The repeal of these guidance documents imposes no unique benefit or burden specific to local partners. See Table 1a.  <b>Direct Costs:</b> See Table 1a.  <b>Indirect Costs:</b> See Table 1a.  <b>Direct Benefits:</b> See Table 1a.  <b>Indirect Benefits:</b> See Table 1a.	
(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 & Benefits (Monetized)	<p>These documents are out of date or detail internal procedures. The repeal of these guidance documents 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>These documents are out of date or detail internal procedures. The repeal of these guidance documents 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
N/A	(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>
Guidance Memo No. 93-026, Permitting Strategy for Wood Preserving Operations	30 pages	Guidance Rescinded	-30 pages
Guidance Memo No. 93-026 Amendment No. 1, Permitting Strategy for Wood Preserving Operations	4 pages	Guidance Rescinded	-4 pages
Guidance Memo No. 00-2015 Implementation Guidance for July 2000 Revisions to the VPDES Permit Regulation	112 pages	Guidance Rescinded	-112 pages
Guidance Memo No. 01-2007 Implementation Guidance for December 2000 Revisions to the VPDES Permit Regulation	23 pages	Guidance Rescinded	-23 pages
GM03-2003, Interpretation for Water Monitoring of GM00-2016 – Chain of Custody Policy and Procedure – Amendment 1	2 pages	Guidance Rescinded	-2 pages
<b>TOTAL</b>			<b>-171 pages</b>

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