



**COMMONWEALTH of VIRGINIA**  
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June 20, 2014

**MEMORANDUM**

**TO:** David Paylor, Director  
Department of Environmental Quality

**FROM:** Matt Gooch  
Assistant Attorney General

**DATE:** June 20, 2014

**Re:** Emission Standards for Volatile Organic Compounds from Petroleum  
Liquid Storage and Transfer Operations, Stage II -- 9VAC5-40; 9VAC5-  
20-21 (fast-track regulations)

I have reviewed the above-referenced amendments to the regulations of the State Air Pollution Control Board. It is my opinion that the Board has the authority to adopt these amendments to the regulations based upon applicable law, including Article 1 of Chapter 13 of Title 10.1 of the Code of Virginia, and specifically, Code § 10.1-1308.

If I may be of any further assistance to you relating to this matter, please do not hesitate to contact me.