



# COMMONWEALTH of VIRGINIA

Office of the Attorney General

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May 16, 2013

The Honorable David K. Paylor, Director  
Virginia Department of Environmental Quality  
629 East Main Street  
Richmond, Virginia 23219

Re: Authority to Promulgate Amendments to Regulations Governing the Transportation of  
Hazardous Waste (9 VAC 20-110-110: Compliance)

Dear Director Paylor:

I have reviewed the amendments to the above-referenced regulation. It is my opinion that the Virginia Waste Management Board has authority to promulgate the amendments to the regulation under applicable law including Chapter 14 of Title 10.1 of the Code of Virginia. It is also my view that these amendments are exempt from the requirements of Article 2 of the Administrative Process Act pursuant to Va. Code. § 2.2-4006(A)(4)(c).

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

Sincerely,

A handwritten signature in cursive script that reads "David C. Grandis".

David C. Grandis  
Assistant Attorney General