



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Kenneth T. Cuccinelli, II
Attorney General

900 East Main Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120
7-1-1

December 18, 2013

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

Re: Periodic Review of the Petroleum Underground Storage Tank Financial Responsibility
Requirements Regulation (9 VAC 25-590)

Dear Director Paylor:

Pursuant to Executive Order 14 (2010), I have reviewed the above-referenced regulation. It is my opinion that the State Water Control Board has the statutory authority for the regulation and that the regulation does not exceed the authority to regulate granted as set out in the enabling legislation.

This certification addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the regulation.

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 blue ink that reads "David C. Grandis".

David C. Grandis
Assistant Attorney General