



COMMONWEALTH of VIRGINIA
Office of the Attorney General

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April 8, 2014

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

Re: Authority to Promulgate Amendments to the Tank Vessel Oil Discharge Contingency
Plan and Financial Responsibility Regulation (9 VAC 25-101 et seq.)

Dear Director Paylor:

I have reviewed the amendments to the above-referenced regulation. It is my opinion that the State Water Control Board has the authority to promulgate the amendments to the regulation under Chapter 3.1 of Title 62.1 of the Code of Virginia.

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