

Summary of Changes

Leesburg Executive Airport Rules and Regulations

Comparison: Current (2021) vs. New Draft Version

WHAT YOU NEED TO KNOW

The Leesburg Executive Airport has drafted updated Rules and Regulations. This document summarizes the key changes between the **current version (adopted May 25, 2021)** and the **new draft version**.

The Big Picture

Aspect	Current (2021)	New Draft
Document Structure	5 Chapters	10 Sections
Page Count	44 pages	35 pages
Content	Rules + Minimum Standards combined	Rules only (Minimum Standards now separate)

Most Important Change: Minimum Standards for commercial operators have been moved to a separate document. The Rules and Regulations now focus on operational requirements, safety, and governance for all airport users.

QUICK REFERENCE: Top Changes That Affect You

✓ NEW REQUIREMENTS

- **Based Aircraft Must Register** - All based aircraft must register with Airport Administration
- Location:** Old Version: Page 22, 40 | New Draft: Page 14, Section 2
- **Access Card System** - Formal access card system with Driver Training Program requirement
- Location:** Not in Old Version | New Draft: Page 13-14, Section 2
- **Self-Fueling Permits** - If you fuel your own aircraft with more than 1,200 gallons annually:
 - Must obtain a permit
 - Must report monthly fuel usage
 - Must pay flowage fees
 - Must carry \$3,000,000 pollution liability insurance
 - Must meet minimum storage and equipment requirements
- Location:** Not in Old Version | New Draft: Page 18-21, Section 4
- **Vehicle Operations on Runways/Taxiways** - Must complete Driver Training Program
- Location:** Old Version: Page 8, 12 | New Draft: Page 30-33, Section 6

■ ■ NEW RESTRICTIONS

- **Aircraft Security** - Must secure aircraft when unattended (keys removed, doors locked, control locks installed)
- Location:** Not in Old Version | New Draft: Page 13, Section 2
- **Derelict Aircraft** - Cannot leave non-flyable aircraft for more than 90 days without permission
- Location:** Old Version: Page 10, 15-16, Chapter 2 | New Draft: Page 27, Section 5
- **Engine Run-ups** - Only in designated areas (holding bays at Taxiway A ends); no maintenance run-ups between 10 PM - 7 AM
- Location:** Old Version: Page 11-12 | New Draft: Page 27, Section 5
- **Hangar Storage** - Maximum 5 gallons of flammable liquids allowed
- Location:** Old Version: Page 14 | New Draft: Page 29, Section 5
- **T-Hangar Maintenance** - Preventive maintenance allowed; no welding, fuel transfer, spray painting, or doping
- Location:** Old Version: Page 36, 43 | New Draft: Page 28-29, Section 5
- **Banner Towing** - Prohibited within airport safety areas
- Location:** Not in Old Version | New Draft: Page 26, Section 5

■ NEW LIMITS

- **Vehicle Speed on AOA** - 15 MPH maximum
- Location:** Not in Old Version | New Draft: Page 31-32, Section 6
- **Parking Duration** - 14-day maximum (notify airport if over 72 hours)
- Location:** Old Version: Page 2, 7-8, 11, 22 | New Draft: Page 32-33, Section 6
- **Spill Reporting Thresholds:**
- ≥1 gallon petroleum: Report to Airport Admin within 48 hours
- ≥5 gallons petroleum: Immediate report to Airport/Fire Department
- Location:** Old Version: Page 3, 5, 26-28 | New Draft: Page 15-16, Section 3

■ NEW RULES FOR SPECIAL OPERATIONS

- **UAS/Drones** - Must comply with FAR Part 107 and obtain Director approval
- Location:** Not in Old Version | New Draft: Page 11, 26, Section 5
- **Ultralight Vehicles** - Must comply with FAR Part 103
- Location:** Not in Old Version | New Draft: Page 26, Section 5
- **Parachuting** - May be authorized per FAR Part 105
- Location:** Old Version: Page 5 | New Draft: Page 26, Section 5

■ NEW ENFORCEMENT & APPEALS

- **Formal No Trespass Notice Process** - Written violation notices with specific procedures
- Location:** Old Version: Page 2, 4, 7, 10 | New Draft: Page 34, Section 8
- **Two-Level Appeals Process** - Appeal to Airport Commission (within 10 days), then to Town Manager
- Location:** Old Version: Page 4-5, 8, 11-12, 15-20 | New Draft: Page 35, Section 9

DETAILED CHANGES BY TOPIC

1. DOCUMENT ORGANIZATION

What Changed?

The document has been completely reorganized from 5 chapters to 10 focused sections.

Old Structure:

- General Provisions
- Aircraft Operation and Airport Traffic Rules
- Airport Operators, Leases and Concessions
- Minimum Standards for Aeronautical Activities
- Minimum Standards for Facilities and Improvements

New Structure:

- Definitions
- General Regulations
- Personal Conduct
- Fire and Safety
- Aeronautical Activities
- Motor Vehicles
- Airport Minimum Standards (reference only)
- Enforcement, Denial of Access, Notice of Violation
- Hearings and Appeals
- Amendments to Rules and Regulations

Why It Matters

- Rules are easier to find by topic
- Minimum Standards separated for commercial operators
- Clearer organization for different user groups

2. DEFINITIONS (SECTION 1)

What Changed?

Expanded from approximately 22 definitions to **73 comprehensive definitions**.

New Definitions Include:

- Abandoned Aircraft
- Abandoned Motor Vehicle
- Access Card
- Aircraft Accident (detailed definition)
- Derelict Aircraft
- Driver Training Program
- Emergency vs. Incident
- Large Aircraft
- Movement Area / Non-Movement Area
- Preventive Maintenance
- Substantial Damage
- Unmanned Aircraft (UAS)
- And 50+ more...

Why It Matters

- Everyone uses the same terminology
- Clearer understanding of what rules apply
- More precise legal definitions

3. GENERAL REGULATIONS (SECTION 2)

What's New?

Based Aircraft Registration (2.10)

- NEW REQUIREMENT:** All based aircraft must register with Airport Administration

- Provides airport with current contact information
- Helps with emergency communications
- Location:** Old Version: Page 22, 40 | New Draft: Page 14, Section 2

Airport Access Cards (2.11)

- NEW SYSTEM:** Formal access card program established
- Requirements:
 - Complete Driver Training Program
 - Obtain access card from Airport Administration
 - Director can rescind cards for violations
 - Cardholders responsible for visitors and employees
- Location:** Not in Old Version | New Draft: Page 13-14, Section 2

Airport Fees (2.09)

- Expanded language on fee establishment
- Late fee provisions added
- Fees listed in Leesburg Town Code Appendix A
- Location:** Old Version: Page 2, 12-15, 18 | New Draft: Page 12, 14, Section 2

Emergency Directives (2.08)

- Airport Director can issue written operating procedures
- Emergency suspension authority for safety
- Authority to take reasonable actions during emergencies
- Location:** New Draft: Page 12-13, Section 2

Why It Matters

- Better security and access control
- Clear accountability for airport users
- Flexibility for emergency situations

4. PERSONAL CONDUCT (NEW SECTION 3)

Location: Not systematically covered in Old Version | New Draft: Page 15-17, Section 3

What's New?

Entirely new dedicated section covering personal behavior and environmental protection.

Environmental Protection (3.03)

- No littering or spilling hazardous substances**
- Garbage disposal requirements
- No burning refuse
- Petroleum spill reporting:**
- ≥ 1 gallon: Report to Airport Admin within 48 hours
- ≥ 5 gallons: Immediate report to Airport/Fire Department
- No salt or sodium-chloride on Airport Operations Area (AOA)**
- De-icing chemical restrictions
- Location:** Old Version: Page 3, 5, 26-28 (Chapter 4) | New Draft: Page 15-16, Section 3

Animals (3.04)

- Service animals permitted
- Pets must be leashed
- Owner responsible for cleanup
- Specific terminal building regulations
- Location:** Old Version: Page 5, 11, 21, 23, 27 | New Draft: Page 16-17, Section 3

Property Preservation (3.05)

- Cannot damage or deface airport property
- Prohibition on unauthorized modifications

Unattended Property (3.06)

- Procedures for handling abandoned property

Construction (3.07)

- All construction requires prior approval

Restricted Activities (3.08)

- Detailed list of prohibited activities

Why It Matters

- Clear rules for everyone's behavior

- Environmental protection requirements
- Consequences for violations

5. FIRE AND SAFETY (SECTION 4)

Location: Old Version: Page 13-14 (limited coverage) | New Draft: Page 18-24, Section 4

Major Expansion

This section has been **significantly expanded** with new comprehensive safety requirements.

NEW: Non-Commercial Self-Fueling (4.03)

Location: Not in Old Version | New Draft: Page 18-21, Section 4

Two-Tier System:

Tier 1: Less than 1,200 gallons annually

- May self-fuel without permit
- Must follow NFPA 407 safety standards
- 5-gallon storage limit
- BC fire extinguisher required

Tier 2: More than 1,200 gallons annually

- REQUIRES Non-Commercial Self-Fueling Permit**
- Must provide:**
- Proof of aircraft ownership or lease
- Monthly fuel usage reports
- Payment of fuel flowage fees
- Minimum Requirements:**
- Storage: 12,000 gallons (Jet A) or 10,000 gallons (Avgas)
- Dedicated refueling vehicle: 750 gallons (Avgas) or 1,200 gallons (Jet A)
- SPCC Plan (if applicable under 40 CFR Part 112)
- Standard Operating Procedures (SOP)
- \$3,000,000 Pollution Liability Insurance**

Enhanced Fueling Operations (4.02)

- Bonding requirements per NFPA 407
- Hot fueling prohibitions (unless trained/equipped)
- No fueling during lightning
- Fuel vehicle operations on runways/taxiways restricted
- 50-foot parking restrictions from buildings
- No lighters or matches on personnel during fueling
- Location:** Old Version: Page 13, 27 | New Draft: Page 18-19, Section 4

Additional Fire Safety

- Expanded smoking prohibitions (4.04)
- Open flame operations require approval (4.05)
- Hazardous materials regulations (4.08)
- Doping and spray-painting restrictions (4.14)
- Fire extinguisher requirements (4.15)

Why It Matters

- Prevents fuel spills and fires
- Clear requirements for self-fueling operations
- Better environmental protection
- Accountability for fuel usage

6. AERONAUTICAL ACTIVITIES (SECTION 5)

Location: Old Version: Page 10-14, Chapter 2 | New Draft: Page 24-30, Section 5

NEW Operational Restrictions (5.02)

Location: New Draft: Page 26, Section 5

Banner Towing

- PROHIBITED** within airport safety areas

- Location:** Not in Old Version | New Draft: Page 26, Section 5

UAS/Drones, Kites, Model Aircraft, Rockets

- Requires Director authorization
- UAS must comply with FAR Part 107
- Location:** Not in Old Version | New Draft: Page 11, 26, Section 5

Ultralight Vehicles

- Must comply with FAR Part 103
- Location:** Not in Old Version | New Draft: Page 26, Section 5

Parachuting

- May be authorized per FAR Part 105
- Location:** Old Version: Page 5 | New Draft: Page 26, Section 5

NEW: Aircraft Accidents (5.01.d)

Location: Not systematically covered in Old Version | New Draft: Page 25, Section 5

Detailed reporting requirements:

- Must report to Airport Director
- NTSB notification per FAR Part 830
- Virginia State Police reporting per 24 VAC5-20-290
- Aircraft cannot be moved without authorization
- Owner liable for removal costs

Expanded Taxi and Ground Rules (5.03)

Location: Old Version: Page 10-12 | New Draft: Page 26-27, Section 5

Aircraft Parking

- Must have lease agreement to park aircraft
- Proper tie-down required (no cargo straps allowed)
- Owner responsible for securing aircraft when unattended

Aircraft Security Requirements:

- Remove keys from ignition
- Lock doors and baggage compartments

- Install control locks
- Set parking brake
- Location:** Not in Old Version | New Draft: Page 13, Section 2 & Page 27, Section 5

NEW: Abandoned and Derelict Aircraft (5.03.b)

Location: Old Version: Page 10, 15-16, Chapter 2 | New Draft: Page 27, Section 5

90-Day Rule:

- Cannot leave non-flyable aircraft for more than 90 days without permission
- Parts storage restricted
- Notification and removal procedures established
- Reference to Virginia Code Section 5.1-2.25
- Owner responsible for removal costs

NEW: Engine Starting and Running (5.03.c)

Location: Old Version: Page 11-12 | New Draft: Page 27, Section 5

Requirements:

- Must be qualified operator (pilot or A&P; mechanic)
- Designated run-up areas only:** Holding bays at Taxiway A ends
- Time restrictions:** No maintenance run-ups 10:00 PM - 7:00 AM
- No engine operation inside hangars**

NEW: Aircraft Maintenance in T-Hangars (5.04)

Location: Old Version: Page 36, 43 | New Draft: Page 28-29, Section 5

What's Allowed:

- Preventive maintenance by aircraft owner

What's Prohibited:

- Welding
- Fuel transfer to/from aircraft
- Doping
- Spray painting

Special Circumstances:

- Certified specialists need Temporary Commercial Operating Permit
- Amateur-built experimental aircraft assembly provisions

NEW: Hangar Storage Limitations (5.05)

Location: Old Version: Page 14 | New Draft: Page 29, Section 5

Restrictions:

- 5-gallon maximum** for flammable liquids
- No commercial activity
- Approved heating systems only
- Proper electrical safety
- No suspended loads from hangar structure
- Fire extinguisher required for T-hangars and Corporate Box hangars
- Battery chargers: 3 amp max for trickle chargers

NEW: Foreign Object Debris - FOD (5.06)

Location: Not in Old Version | New Draft: Page 30, Section 6

- Requirements for FOD management

Why It Matters

- Safety for all airport operations
- Clear maintenance guidelines
- Protection against abandoned aircraft
- Noise management (run-up time restrictions)

7. MOTOR VEHICLES (SECTION 6)

Location: Old Version: Page 8, 12 (limited coverage) | New Draft: Page 30-34, Section 6

Dramatically Expanded from Limited Coverage

Old version: Basic traffic rules

New version: Comprehensive 9-subsection regulatory framework

General Traffic Regulations (6.01)

Location: New Draft: Page 30-31, Section 6

- Authority to establish traffic regulations
- Traffic signs and signals must be obeyed
- Pedestrian right-of-way
- Vehicle condition requirements
- Slow-moving vehicle requirements

Licensing (6.02)

Location: New Draft: Page 31, Section 6

- Valid driver's license required
- Proper training required for AOA access
- Current registration and inspection required

Accident Procedures (6.03)

Location: New Draft: Page 31, Section 6

- NEW:** Mandatory reporting to Police and Airport Director

Speed Limits (6.04)

Location: Not in Old Version | New Draft: Page 31-32, Section 6

- AOA: 15 MPH maximum**
- Safe speed: Reasonable and prudent
- Maximum: Posted limits

Vehicle Operations on AOA (6.05)

Location: Old Version: Page 8, 12 | New Draft: Page 32, Section 6

NEW Comprehensive Requirements:

- Permission required to access AOA
- Parking restrictions
- Two-way radio required** for crossing taxiways/runways
- Orange or yellow rotating beacon required**
- Must communicate with Control Tower when operating
- CTAF self-announce during non-towered operations
- Driver Training Program completion required**

Public Parking (6.06)

Location: Old Version: Page 2, 7-8, 11, 22 | New Draft: Page 32-33, Section 6

- Must comply with traffic signs
- Must park in designated spaces
- 14-day maximum parking duration**
- 72-hour notification required** if parking longer than 72 hours

Loading and Unloading (6.07)

Location: New Draft: Page 33, Section 6

- Designated areas only
- Curbside restrictions

Authority to Remove Vehicles (6.08)

Location: New Draft: Page 33, Section 6

- NEW:** Director's authority to remove disabled, abandoned, or illegally parked vehicles

Traffic Citations (6.09)

Location: New Draft: Page 33-34, Section 6

- NEW:** Leesburg Police Department enforcement authority

Why It Matters

- Safety around aircraft operations
- Clear traffic rules for all vehicle operators
- Prevents long-term parking issues
- Professional airport operations

8. ENFORCEMENT (NEW SECTION 8)

Location: Old Version: Page 2, 4, 7, 10, 17-22 (scattered) | New Draft: Page 34, Section 8

Comprehensive New Framework

Old version: Limited penalty provisions scattered throughout

New version: Dedicated enforcement section with formal procedures

Enforcement Authority (8.01)

Location: New Draft: Page 34, Section 8

- Airport Director or authorized representative

Penalties and Removal (8.02)

Location: Old Version: Page 2, 4, 7, 10 | New Draft: Page 34, Section 8

No Trespass Notice:

- Formal written notice process
- Must identify:
 - Specific violations
 - Date and time of violation
 - Duration of no trespass order
- Served in person AND by certified mail
- Filed with Airport Director's Office

Other Consequences:

- Warnings

- Violation letters
- Suspensions
- Lease terminations

Why It Matters

- Clear consequences for violations
- Fair and consistent enforcement
- Due process protections

9. HEARINGS AND APPEALS (NEW SECTION 9)

Location: Old Version: Page 4-5, 8, 11-12, 15-20, 39 (limited) | New Draft: Page 35, Section 9

Formal Two-Tier Appeals Process

Old version: Limited appeals; Town Manager only

New version: Two formal levels of appeal

Level 1: Appeal to Airport Commission

Location: Old Version: Page 4-5, 8, 15-20 | New Draft: Page 35, Section 9

- 10-day window** to file appeal
- Deliver notice to Town Attorney
- Hearing at next regular Commission meeting (for No Trespass Notices)
- Person may:
 - Appear in person
 - Be represented by counsel
 - Present evidence and witnesses
- Commission may affirm, modify, or reverse by majority vote

Level 2: Appeal to Town Manager

Location: Old Version: Page 4-5 | New Draft: Page 35, Section 9

- From any final Commission decision
- Town Manager determines schedule and process

Why It Matters

- Fair appeal process
- Opportunity to be heard
- Independent review of enforcement decisions

10. AMENDMENTS (NEW SECTION 10)

Location: Not in Old Version | New Draft: Page 35, Section 10

Formal Amendment Process Established

Old version: No formal process described

New version: Detailed amendment procedure

Process Steps:

- Proposed by Airport Director or Commission members
- Written submission to Airport Director
- Staff and Commission study
- **30-day public comment period**
- Notice posted at Administration Office and Town website
- Comments submitted in writing
- Commission recommendation to Town Council
- Town Council approval/disapproval
- Effective immediately upon approval (unless specified otherwise)
- Incorporated via update or Operations Directive

Why It Matters

- Public input on changes
- Transparent process

- Community involvement

WHAT WAS REMOVED?

Moved to Separate Minimum Standards Document

The following content is **no longer in the Rules and Regulations** but will appear in a separate **Minimum Standards** document for commercial operators:

Commercial Operator Requirements (Old Chapter 4):

- Full Service FBO Requirements
- Airframe and Power Plant Repair
- Avionics, Instrument, Propeller Repair
- Aircraft Charter and Air Taxi
- Aircraft Sales
- Aircraft Rental
- Flight Training
- Specialized Commercial Aeronautical Activities
- Hangar Rental Operations
- Multiple Commercial Aeronautical Activities
- Other Non-Aeronautical Related Activities
- Flying Clubs

Facility Standards (Old Chapter 5):

- Review Procedures
- Paved Areas
- Fuel Storage and Distribution
- Hangars, Buildings, and Other Structures
- Chemicals and Hazardous Materials

Note: The new Section 7 references the separate Minimum Standards document that commercial operators must comply with.

SUMMARY OF KEY THEMES

1. Safety First

Significantly expanded safety provisions throughout:

- Fuel handling and spill response
- Fire prevention measures
- Hazardous materials handling

2. Environmental Protection

New comprehensive environmental requirements:

- Spill reporting thresholds
- Prohibition on salt/sodium-chloride on AOA
- De-icing chemical restrictions
- Proper waste disposal

3. Accountability

Greater emphasis on user responsibility:

- Aircraft registration
- Access control systems
- Detailed owner liability
- Specific training requirements

4. Modernization

Updated for contemporary aviation:

- UAS/drone operations
- Self-fueling framework
- FOD management

- Enhanced vehicle safety

5. Clarity and Consistency

- More precise legal language
- Specific regulatory references (FAR, NFPA, Virginia Code)
- Clear definitions (73 vs. 22)
- Organized by topic rather than mixed content

6. Due Process

Formal procedures established:

- Enforcement procedures
- Two-level appeals process
- Amendment process with public input

TIMELINE

- Current Document:** Adopted by Leesburg Town Council on May 25, 2021
- New Draft:** Adoption date to be determined

QUESTIONS?

For questions about these changes or the new Rules and Regulations, please contact:

Leesburg Executive Airport

Airport Administration Office

Document Purpose: Summary of changes between 2021 Rules, Regulations, and Minimum Standards and Draft Rules and Regulations

Prepared For: Public information and comment

Format: Comparison analysis highlighting key differences