

Virginia Pollutant Discharge Elimination System

General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) Serving the Urbanized Areas of Virginia

Permit coverage from July 1, 2013 to June 30, 2018



MS4 Program Plan for the Dulles Toll Road (DTR) Permit Number VAR040120

Prepared by:

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The purpose of the Dulles Toll Road (DTR) MS4 Program Plan is to consolidate descriptions of various components of the previous Virginia Department of Transportation (VDOT) General Permit, and the existing Metropolitan Washington Airports Authority (Airports Authority) Permit Number VAR040120 created for urbanized areas of Virginia, which includes public education programs as they pertain to preventing stormwater pollution, into a single unified document for Virginia Department of Conservation and Recreation (DCR) and Airports Authority management purposes. The Airports Authority MS4 Permit Management program is provided in the context of the six Minimum Control Measures (MCMs) outlined in the revised Virginia General Permit, effective July 1, 2013. The six MCMs are:

- Public Education and Outreach on Stormwater Impacts.
- Public Involvement and Participation.
- Illicit Discharge Detection and Elimination.
- Construction Site Stormwater Runoff Control.
- Post Construction Stormwater Management for New and Redeveloped Lands.
- Pollution Prevention/Good Housekeeping for Municipal Operations.

1. Extent of the regulated small MS4 area of the Dulles Toll Road

The regulated property includes the combined rights-of-ways for the Dulles Airport Access Highway (DAAH), the DTR, and Phase 1 of the Washington Metropolitan Area Transit Authority (WMATA) rail service from the West Falls Church Metro Station to Dulles. Phase 1 runs 11.5 miles from East Falls Church to Wiehle Avenue on the eastern edge of Reston. It will include four stations in Tysons Corner-Tysons east, Tysons Central 123, Tysons Central 7 and Tysons West. Construction began in March 2009 and is scheduled to be completed in late 2013. The entire Dulles Corridor is located in Fairfax and Loudoun Counties, and the City of Falls Church, Virginia. The property is a highway and transportation right-of-way that is adjacent to residential and commercial properties. The right-of-way for these highways and selected on- and off-ramps extends in an east-west direction from just west of the Magarity Road overpass on the east side of the corridor (inside the Washington Beltway [I-495] but before merging with I-66) to Route 28 on the west side of the corridor. The total length of the right-of-way is approximately 14 miles. The average width of the right-of-way is approximately 700 feet.

2. Identification of the Dulles Toll Road MS4 Operator and Responsibilities

The operator is the Metropolitan Washington Airports Authority (Airports Authority). There have been no modifications to any Airports Authority department roles and responsibilities since July 2010, the start date of our current MS4 permit. Christopher U. Browne is the Airport Manager. Brian A. Leuck is the Manager of the Engineering & Maintenance Department, which oversees and ensures compliance of the MS4 permit. Jon D. Byroade, Government Programs Engineer, is responsible for maintaining compliance.

3. Dulles Toll Road MS4 Hydrologic Unit Codes

There are four Hydrologic Unit Codes (HUC) identified in the Virginia 6th Order National Watershed Boundary Dataset (NWBD) that transect the DTR drainage area, as listed and shown below. Since the entire width of the transportation corridor encompassing the DAAH, the DTR, and future WMATA rail only is 450 feet on average, very little drainage area exists in each HUC. In fact, Difficult Run (PL22) contains the majority of the DTR drainage area and has the most stream crossings under the DTR. The total estimated drainage area in acres, served by the regulated small MS4 discharging to any receiving surface waters are listed below:

COUNTY	VAHU6	WATERSHED	STREAM CROSSINGS	Drainage Area (in acres)
Loudoun	PL18	Horsepen Run	2	97
Fairfax	PL21	Sugarland Run	3	103
Fairfax	PL22	Difficult Run	4	368
Arlington	PL23	Potomac River	2	108

4. Total Maximum Daily Load (TMDL) Limits for MS4 area

The DTR may be affected in the future by a total maximum daily load (TMDL) limits if allocated for Difficult Run and Sugarland Run since both have been identified as impaired receiving surface waters listed in the most recent Virginia 305(b)/303(d) Water Quality Assessment. The DTR intersects Difficult Run watershed (PL22) and the Sugarland Run watershed (PL21). DTR operations and maintenance will not cause an increase in fecal coliform, sediment loading, or any other pollutant to either watershed since sources for pollutants does not exist in the DTR drainage area. The causes and locations of impairment are given below:

Cause Group Code A11R-03-BEN Difficult Run
Benthic-Macroinvertebrate Bioassessments - Total Impaired Size by Water Type: Difficult Run
City / County: Fairfax Co.
Two biological monitoring events in 2006 at station 1aDIF005.06 (Route 675) both resulted in a VSCI score which indicates an impaired macroinvertebrate community, two biological monitoring events in 2006 at station 1aDIF010.48 (Route 681) both resulted in a VSCI score which indicates an impaired macroinvertebrate community, and two biological monitoring events in 2002 at station 1aDIF010.57 both resulted in a VSCI score which indicates an impaired macroinvertebrate community.
Location: Begins at confluence with Rocky Branch, approximately 0.25-river mile upstream of Route 672, and continues downstream until the confluence with Wolftrap Creek.
Cause Group Code A10R-01-BAC Sugarland Run
Escherichia coli - Total Impaired Size by Water Type: Sugarland Run.
City / County: Fairfax Co and. Loudoun Co.
E. coli bacteria criterion excursions (4 of 18 samples - 22.2%) from station 1aSUG004.42, at Route 7.
Location: Begins at the confluence with Folly Lick Branch, at approximately rivermile 5.75, and continues downstream until the confluence with the Potomac River.

5. MS4 Program Elements

1. Public Education and Outreach on Stormwater Impacts (MCM 1)

As part of the Airports Authority's Virginia Pollutant Discharge Elimination System (VPDES) individual permit number VA0089541 with Virginia Department of Environmental Quality (DEQ), the Airports Authority implemented a public education program to distribute educational materials and annual training to the community and conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public and airport employees can take to reduce pollutants in stormwater runoff. This activity was implemented in 2006, under Stormwater Phase II guidelines, and continues into the current year. All public education, outreach, and involvement programs under this permit have been developed and implemented in coordination with the Airports Authority Public Affairs Office and the Airport Manager's Office. Past and ongoing efforts to satisfy this MCM are given in *Table 1*.

2. Public Involvement and Participation (MCM 2)

Public involvement and participation is difficult to implement for the DTR since the public is not allowed to stop on the DTR, except in emergencies. Any such efforts would have to be performed with the public education BMPs and may treat the DTR and Airport as a single entity, in coordination with the ongoing Rail-to-Dulles project. Activities which have been completed involve the public are included in *Table 2*.

3. Illicit Discharge Detection and Elimination (MCM 3)

The Airports Authority has developed a program to detect and eliminate illicit discharges, as defined at 9 VAC 25-750-10, into the stormwater collection system on Airport property. This project is complete for the Airport, and has been expanded to include DTR property. Efforts enacted to detect and eliminate illicit discharges into the DTR stormwater collection system can be found in *Table 3*.

4. Construction Site Stormwater Runoff Control (MCM 4)

The required regulatory mechanism to control construction runoff has been in place on the Airport for many years. In accordance with DCR regulations, a construction-related stormwater discharge permit application must be submitted for any land-disturbing activity that affects one acre or more of land. The Airports Authority has adopted a more stringent policy of 2,500 square feet or more of land disturbed. The Airports Authority requires each construction contractor to prepare a site-specific Stormwater Pollution Prevention Plan (SPPP) and to submit a copy of the DCR discharge permit with their SPPP prior to commencing land-disturbing activities.

Regardless of the size of land disturbance, all construction activities shall have erosion and sediment control plans for review and approval by the Airports Authority's Building Codes and Environmental Department, Office of Engineering, prior to the issuance of the Construction/Building Code Permit. Contractors are to exercise every reasonable precaution, including temporary and permanent measures, throughout the duration of the project to control erosion and prevent or minimize pollution of receiving waters. The contract specification also states that siltation control measures shall be applied to erodible material exposed by any activity associated with construction including, but not limited to, local material sources, stockpiles, disposal areas, and haul roads. Erosion and sediment control devices and products used are to be in accordance with the *Virginia Erosion and Sediment Control Handbook*, Third Edition, 1992 (and any subsequent revisions). Responsibility for identifying and designing site temporary and permanent BMPs for construction activities lies with the architect/engineer.

The Airports Authority will comply with the Virginia Erosion and Sediment Control Law, the Virginia Stormwater Management Act, and attendant regulations regarding land disturbance activities. All regulated land disturbance activities will be performed in accordance with the most recently DCR-approved version of the Airports Authority Erosion and Sediment Control and Stormwater Management standards and specifications. In addition, the Airports Authority will provide the controls on construction found in **Table 4**.

5. Post-Construction Stormwater Management for New Development and Redeveloped Lands (MCM 5)

The Airports Authority has developed, implemented, and enforced a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to 2,500 square feet, and projects less than 2,500 square feet that are part of a larger common plan of development. The program has been expanded to cover the DTR. Past and ongoing efforts to satisfy this MCM are given in **Table 5**.

All current and future structural BMPs on the DTR are designed and constructed to function as extended detention basins, or Dry Ponds. Dry ponds retain water for a specified period of time (usually 24 hours) after a storm. Water is impounded temporarily to allow many of the pollutants time to settle to the bottom. The impounded water is discharged through an outlet that provides for prolonged release. This DTR MS4 BMP inspection and maintenance program has been developed using the following guidance for the Northern Virginia area:

Northern Virginia BMP Handbook: A Guide to Planning and Designing Best Management Practices in Northern Virginia (1992); Northern Virginia Planning District Commission (NVPDC) & Engineers and Surveyors Institute (ESI)

Maintaining Stormwater Systems: A Guidebook for Private Owners and Operators in Northern Virginia (2007); the Northern Virginia Regional Commission (NVRC)

A. REGULAR INSPECTIONS

The Airports Authority will require a specific schedule of inspections for all ponds. In most instances, a quarterly or semi-annual inspection, depending on the location, will be performed. It will also be necessary to conduct an inspection after a large storm event during which the ponds' capacity were surpassed. All inspections will include the following items and will be documented with checklists:

STRUCTURAL INTEGRITY

- Does the facility show signs of settling, cracking, bulging, misalignment, or other structural deterioration?
- Do embankments, emergency spillways, side slopes, or inlet/outlet structures show signs of excessive erosion or slumping?
- Is the outlet pipe damaged or otherwise not functioning properly?
- Do impoundment and inlet areas show erosion, low spots, or lack of stabilization?
- Are trees or saplings present on the embankment?
- Are animal burrows present?
- Are contributing areas unstabilized with evidence of erosion?
- Do grassed areas require mowing and/or are clippings building up?

WORKING CONDITIONS

- Does the depth of sediment or other factors suggest a loss of storage volume?
- Is there standing water in inappropriate areas after a dry period?
- Is there an accumulation of floating debris and/or trash?

OTHER INSPECTION ITEMS

- Is there evidence of encroachments or improper use of impounded areas?
- Are there signs of vandalism?
- Do fences, gates, locks, or other safety devices need repair?
- Is there excessive algae growth, or has one type of vegetation taken over the facility?
- Is there evidence of oil, grease, or other automotive fluids entering and clogging the facility?

B. ROUTINE MAINTENANCE

Vegetation Management

Most ponds rely on vegetation to filter sediment from stormwater before it reaches the pond. Vegetation also serves to prevent erosion of the banks and stabilize the bottom of the facility. While turf grass is the most common groundcover, many ponds are being retrofitted or designed with woody vegetation and wetland plants to increase pollutant removal.

- **Mowing** - Most grass is hardiest if it is maintained as an upland meadow, therefore mow no shorter than six to eight inches. Grass on embankments should be cut at least twice during the growing seasons and once during the summer.
- **Pest and Weed Control** - To reduce the amount of pollutants reaching the pond, avoid over fertilization and excessive pesticide use.
- **Removing Sediment Build-Up** - Since the vegetation surrounding the pond is designed to trap sediment, it is likely to become laden with sediment.
- **Stabilize Eroded Areas or Bare Spots** - Bare spots should be vigorously raked, backfilled if needed, covered with top soil, and seeded.
- **Unwanted Vegetation** - Some vegetation is destructive to a pond. Keeping dams and bottom areas free of deep-rooted vegetation is critical as roots may destabilize the structure. Consistent mowing and monitoring will control any unwanted vegetation.

Embankment and Outlet Stabilization

A stable embankment is important to ensure that erosion does not contribute to water quality problems and that embankments are not breached - resulting in downstream flooding. Maintaining a healthy vegetative cover and preventing the growth of deep-rooted (woody) vegetation on embankment areas is an important component to stabilization. Animal burrows will also deteriorate the structural integrity of an embankment. Groundhogs in particular will burrow tunnels up to six inches in diameter. Efforts should be made to control excessive animal burrowing and existing burrows should be filled as soon as possible

Debris and Litter Control

Regular removal of debris and litter can be expected to help in the following areas:

- reduce the chance of clogging outlet
- structures and trash racks;
- prevent damage to vegetated structures;
- reduce mosquito breeding habitats;
- maintain facility appearance; and,
- reduce conditions for excessive algal growth.

Mechanical Components Maintenance

Some ponds have mechanical components that need periodic attention - valves, sluice gates, pumps, anti-vortex devices, and access hatches should be functional at all times.

Access Maintenance

Pond sites are designed so that heavy equipment can safely and easily reach the facility for non-routine maintenance. Routine maintenance of access areas is particularly important since one never knows when emergency access will be needed. Maintenance includes removal of woody vegetation, upkeep of gravel areas, fences, and locks.

6. Pollution Prevention and Good Housekeeping for Municipal Operations (MCM 6)

The Airports Authority is expanding our existing operation and maintenance program to include a stronger training component and has the ultimate goal of preventing or reducing pollutant runoff from DTR operations. By using training materials that are available from EPA, State, and other organizations, the program includes employee training to prevent and reduce stormwater pollution from activities such as open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. The intent of this control measure is to ensure that existing operations are performed in ways that will minimize contamination of stormwater discharges. The Airports Authority has addressed the following components when developing the program for this measure as shown in ***Table 6***.

Table 1: Public Education and Outreach

<i>BMP</i>	<i>Measurable Goal</i>	<i>Current Permit Status</i>	<i>Future Actions</i>
BMP 1A – Public Education	Develop and maintain a DTR Stormwater Management web page on www.mwaa.com .	Completed: The site has had 833 views from June 1, 2011 through May 31, 2012.	The Airports Authority will continue to update web site posting as needed.
	Evaluate the effectiveness of the stormwater management educational videos and Public Service Announcements (PSAs).	Ongoing: The Airports Authority is evaluating the need and effectiveness of the stormwater management educational videos or PSAs.	The Airports Authority will decide on use of PSAs to enhance goal of water quality on DTR property.
	Develop a Stormwater Management fact sheet. An electronic version of the fact sheet will be posted on the www.mwaa.com .	Completed: A DTR Stormwater Management fact sheet will be available on the website.	The Airports Authority will create a combined Stormwater Management Fact Sheet to include the entire transportation corridor.
	Partner with other MS4 operators to broadcast Stormwater Management PSAs once in each permit 5-year cycle.	Ongoing: The Airports Authority continues to review options and collaborating opportunities with other MS4 operators.	The Airports Authority will collaborating in the future with adjacent MS4 jurisdictions if necessary or effective for management of stormwater runoff from the DTR.
BMP 1B – Public Outreach	Evaluate and promote storm drain stenciling and programs similar to the Adopt-a-Highway program. This goal was to evaluate programs similar to the VDOT Adopt-a-Highway program for applicability to the DTR.	Declined: The Airports Authority has determined that this VDOT program is not for primary highways such as the DTR with very limited access.	The Airports Authority anticipates no outreach projects on the DTR itself.
	Evaluate watershed sign installation program (such as “Drains Directly to Chesapeake Bay”).	Declined: Given the limited major stream crossings on the DTR, this option has been eliminated from further consideration.	No future action necessary.

Table 2: Public Participation/Involvement

<i>BMP</i>	<i>Measurable Goal</i>	<i>Current Permit Status</i>	<i>Future Actions</i>
BMP 2A – Public Involvement	Make available for public review the DTR MS4 Program Plan, General Permit, and subsequent annual reports on the Airports Authority Stormwater Management web page.	Completed: All documents are available on the website www.mwaa.com .	The Airports Authority will provide updates to MS4 Program Plan as needed and post future years’ Annual Reports on www.mwaa.com .
BMP 2B – Public Participation	Participate in local activities aimed at increasing public awareness of water quality and stormwater issues.	Ongoing: The Airports Authority continues to evaluate participating and local activities to address joint water quality issues in the Potomac Basin.	The Airports Authority will attend, as appropriate, any meetings with Federal, Virginia, and local agencies concerning water quality and the DTR.

Table 3: Illicit Discharge Elimination and Prevention

<i>BMP</i>	<i>Measurable Goal</i>	<i>Current Permit Status</i>	<i>Future Actions</i>
BMP 3A - Evaluate guidance and training programs to prohibit non-stormwater discharge into MS4	Review training guidance and current practices and update and revise as necessary to adequately train DTR employees.	Completed: The Airports Authority has revised all training programs to include DTR operations and DTR employees.	The Airports Authority will update annual training as needed.
	Provide Illicit Discharge Detection and Elimination (IDDE) training programs to appropriate audiences.	Completed: DTR employees have received the full Environmental Awareness training. Course provided direction on how to recognize illicit discharges, how to respond and report to Fire Department and Government Programs.	The Airports Authority will update annual training as needed.
BMP 3B - Guidance to identify and report illicit discharges connections	Develop or revise illicit discharge identification and reporting protocols.	Completed: The Airports Authority has expanded spill reporting to include releases on DTR. No permanent discharge connections to other MS4 permit holders have been identified to date, and it is believed none exists.	The Airports Authority will maintain identification training and reporting protocols.
	Establish a means for the public to report illicit discharges.	Ongoing: The Airports Authority continues to review options to use web site or other media services for public to report accidents and releases in DTR drainage areas.	The Airports Authority will determine the need for and implement such notifications from the users of the DTR, if deemed necessary.
BMP 3C - Inventory of DTR stormwater system	Develop and maintain an updated inventory of roadway outfalls in the MS4 urbanized areas of the DTR.	Ongoing: The Airports Authority is awaiting complete stormwater management maps for Phase I and II from the DCMF for identification of future outfalls and collection structures.	The Airports Authority will complete this BMP upon completion of Phase 1 of the Dulles Metrorail Project in late 2013
BMP 3D - Track and eliminate illicit discharges	Notify in writing any downstream-regulated MS4 to which the DTR small-regulated MS4 is physically interconnected to their system.	Completed: The Airports Authority sent a letter on June 28, 2011 to four adjacent MS4 permit holders.	No further action required.
	Develop and maintain a process for contacting and reporting illicit discharges to appropriate authorities.	Completed: The Airports Authority will report to DEQ and DCR in the same manner (e-mail and telephone call, with follow-up report, if required). Any discharges will also be reported adjacent MS4 permit holders, as needed. All employees have been instructed to submit release reports to Government Programs.	The Airports Authority will continue to update the database to generate spill logs and illicit discharges, as needed for DCR and DEQ annual reports.

Table 4: Construction Site Stormwater Run-Off Control

<i>BMP</i>	<i>Measurable Goal</i>	<i>Current Permit Status</i>	<i>Future Actions</i>
BMP 4 - Procedures for receipt and consideration of information submitted by the public	Develop and implement procedures for the receipt and consideration of information submitted by the public concerning the Airports Authority's stormwater program.	Ongoing: The Airports Authority is determining the applicability of this BMP to future DTR construction projects. All current construction activities and response to public inquiries is now handled by the DCMP, either through their website (www.dullesmetro.com), public meetings, and direct communications.	It is currently unknown if this BMP will be used after construction of the Dulles Corridor is complete. At that time, the Airport Authority may have similar contacts for DTR stormwater and other environmental information for the operation of stormwater structures on www.mwaa.com .

Table 5: Post-Construction Runoff Control

<i>BMP</i>	<i>Measurable Goal</i>	<i>Current Permit Status</i>	<i>Future Actions</i>
BMP 5 - Provide long-term operation and maintenance of BMPs and controls	Evaluate inspection and maintenance guidance and procedures and revise or update as appropriate.	Ongoing: The Airports Authority uses the current inspection and maintenance protocols found in the <u>Stormwater Operations and Maintenance Manual</u> (approved by DEQ in 2010).	The Airports Authority will update the Manual to include stormwater structures located within the DTR right-of-way, with the guidance provided above.
	Update/develop/maintain a database of all known structural stormwater management facilities owned and operated by the Authority.	Ongoing: The Airports Authority is awaiting complete stormwater management maps and BMP details for Phase I of the DCMP for identification of future outfalls and collection structures	The Airports Authority will compile a complete inventory of permanent stormwater structures on DTR property that will require long-term operation and maintenance once these BMPs are operational.
	Perform yearly inspection and required maintenance on stormwater management facilities.	Ongoing: The Airports Authority will use the current inspection and maintenance frequencies found in the <u>Stormwater Operations and Maintenance Manual</u> .	The Airports Authority will update the O&M Manual to include stormwater structures located within the DTR right-of-way. Once turned over, these will be added to the Airports Authority preventive maintenance and inspection programs for stormwater management.

Table 6: Pollution Prevention/Good Housekeeping

<i>BMP</i>	<i>Measurable Goal</i>	<i>Current Permit Status</i>	<i>Future Actions</i>
BMP 6A - Implement operation procedures, maintenance schedules, and long-	Review and revise as necessary the compliance procedures for maintenance activities.	Completed: The Airports Authority has expanded our DEQ-approved SPPP and Good Housekeeping BMPs to areas and operations on the DTR.	The Airports Authority will monitor conditions and activities on the DTR and will ensure that protocols of our SPPP are adhered to within the DTR right-of-way.

term inspection procedures to reduce pollutant discharges	Perform maintenance activities such as animal carcass removal and disposal, road cleaning, vehicle removal, etc. to minimize/eliminate potential sources of stormwater pollution.	Ongoing: Since 2010, maintenance on the DTR has been performed under various contracts with private companies.	Maintain contracts and ensure companies have all required licenses and certification to provide their services on the DTR.
	Continue to implement procedures and training that will encourage employees and contractors to employ pollution and prevention practices in day-to-day operations.	Ongoing: The Airports Authority has revised all training programs to include DTR operations and DTR employees. This training includes topics such as good housekeeping and pollution prevention.	The Airports Authority will update annual training as needed.
BMP 6B - Implement a program to eliminate discharges of pollutants and promote the proper disposal and recycling of waste	Annually evaluate the Authority's waste management and recycling programs and revise waste disposal processes and procedures as necessary.	Ongoing: The Airports Authority has a contract to pick-up trash and recyclables. Hazardous, non-hazardous, and universal wastes are handled under the Airports Authority contract.	The trash and recyclable contract will be maintained. All hazardous, non-hazardous, and universal wastes generated by remediation activities or toll road operations in the DTR right-of-way will be disposed under our EPA generator permit VA6690500909.
	Ensure proper disposal of wastes from construction and maintenance activities in accordance with the DCR-approved erosion and sediment control and stormwater management standards and specifications through environmental compliance reviews.	Ongoing: The Airports Authority has incorporated the procedures used successfully on large-scale construction projects on Airport property under the Dulles Development program, to include DTR operations and construction within the DTR right-of way.	The Airports Authority will maintain the program standards above for future construction projects on the DTR under Airports Authority contacts, or by Airports Authority Grounds Maintenance employees.
	Develop or revise protocols and tracking procedure for performing environmental compliance assessments of DTR Facilities. Perform annual reviews.	Completed: The Airports Authority uses existing inspection protocols to track compliance with an Environmental Management System (by Comm-Trac ver. 3.1 by EDM, Inc.) database.	The Airports Authority will continue to track progress in our EMS for each permit year for the DTR MS4 permit requirements.
BMP 6C - Employee pollution prevention education	Implement training courses for employees that promote a general awareness of stormwater management and pollution prevention.	Completed: The Airports Authority has revised all training programs to include DTR operations and DTR employees. This training includes topics such as good housekeeping and pollution prevention procedures, waste disposal and marking, and emergency response awareness.	The Airports Authority will update annual training as needed.
	Provide waste management, advance hazardous waste management, in-stream maintenance activities, US DOT hazardous shipping, SPCC, and VDACS pesticide applicator certification training to appropriate employees.	Completed: The Airports Authority has included DTR in various contracts.	Maintain contracts and ensure companies have all required licenses and certification to provide their services on the DTR.