Re: MS4 General Permit Annual Report
Old Dominion University
General Permit Registration Number VAR 040078

A. Background Information

1. Old Dominion University, General Permit Registration Number VAR 040078
2. Permit Year 2018
3. Annual Standards and Specifications were revised
4. No new MS4 outfalls were added during the permit year
5. Signed certification attached.

B. MCM 1 - Public Education and Outreach

ODU’s Public Education and Outreach efforts related to the high-priority water quality issues take the following forms: Adopt-A-Stream clean-ups; Environmental Awareness Training; Storm Drain Marking; and Public Service Announcements. The following describes ODU’s ability to educate affected community members with regard to the stated High-Priority Water Quality Issues.

- Nutrient Management - nutrient management effects two departments on campus: University Grounds and Athletic Grounds. There are ten individuals who are qualified as Certified Fertilizer Applicators to apply fertilizers to University and Athletic grounds who follow guidelines set forth in our current Nutrient Management Plan, revised 2015. A contract for the 2018 revision of our Nutrient Management Plan has been established and is underway. Each member of Grounds has also attended the spill prevention control and countermeasure training offered by the Environmental Health and Safety Office. The training is required to be attended by all affected employees a minimum of once every two years. ODU has reached 100 percent of the target audience. ODU plans to utilize the same means of education for the coming year and expects the target audience reached to remain at 100 percent. Classes were held in June of this year where all members of the Grounds Division were in attendance.

- Petroleum Releases - the potential for petroleum releases within the confines of the MS4 permitted areas is great due to the amount of automobile traffic that the
campus sees each year from faculty, staff and students. ODU uses several methods for informing the affected population of this potential and the importance of reporting any illicit discharges. Transportation and Parking Services distribute informational fliers with each mailing for Parking Pass Applications and hand deliver them to those who purchase the passes in person. This year Transportation and Parking Services distributed approximately 24,000 fliers. The Department of Human Resources also puts informational pamphlets in each New Employee Packet given to new hires. This year ODU hired approximately 326 new employees during the 2017/2018 reporting year. The Environmental Health and Safety Office also places markers at each storm drain inlet that state “Only Rain Down the Storm Drain”. ODU recruited a student intern to place markers on all new storm drain inlets and replace damaged or missing markers within the MS4 permit area. ODU also displays public service announcements over the information screens of Webb Student Center that are viewed by all visitors in several locations within the facility. The flier, pamphlet and community education contacts provide information on how to identify and report illicit discharges. ODU has reached 100 percent of the target audiences of those who drive to campus and new full and part-time hires.

- Litter and Debris – litter and debris control is an ongoing high priority issue for the campus from a pollution prevention standpoint. ODU utilizes the same efforts mentioned above in the Petroleum Releases section for informing the community about how to identify and report releases of this kind. Fliers, pamphlets, and public service announcements identify various types of illicit discharges that should be reported to the Environmental Health and Safety Office. ODU estimates that 70 percent of the target audience have been reached using these methods for the fourth consecutive year.

- Sediment Deposition - erosion and sediment control is maintained by contractors who perform work involving regulated land disturbing activities. Inspections of permitted sites were performed, as required, by the City of Norfolk. In the coming year, inspections will be performed by contracted inspectors to reflect changes made in our Annual Standards and Specifications ODU’s Department of Design and Construction has 4 full time site inspectors who visit active sites daily and ensure that any findings of transgression to the erosion and sediment controls are corrected right away. Reports of erosions and sediment control inspections are forwarded to the Environmental Health and Safety Office for review and record keeping. The site inspectors are trained to identify any problems related to erosion and sediment control of land disturbing activities. ODU has reached 100% of the intended audience for this metric.

In the coming year, ODU will use the same outreach efforts and explore other opportunities to reach students, faculty, and staff. Annually, ODU distributes approximately 24,000 parking passes and hires approximately 400 new employees. Due to continued outreach and education efforts within the campus community, ODU expects an overall increase in the number of people who are reached each year.
C. **MCM 2 - Public Involvement**

- Stormwater Pollution Prevention Plan (SWPPP) – a copy of the plan is maintained on the Environmental Health and Safety Office website at [http://www.odu.edu/life/sustainable/stormwater-management](http://www.odu.edu/life/sustainable/stormwater-management)
- MS4 Program Plan – a copy of the Program Plan is maintained on the Environmental Health and Safety Office website at [http://www.odu.edu/life/sustainable/stormwater-management](http://www.odu.edu/life/sustainable/stormwater-management)
- Annual Reports – copies of the previous three annual reports are maintained on the Environmental Health and Safety Office website at [http://www.odu.edu/life/sustainable/stormwater-management](http://www.odu.edu/life/sustainable/stormwater-management)
- Public Participation – this metric is met by several different means. ODU holds a minimum of four Adopt-A-Stream events annually. This year ODU held a total of four events, two during the fall and two during the spring semester on shorelines that are adjacent to the Elizabeth and Lafayette Rivers. Attached (Attachment A) are copies of the sign-in sheets for each of the events. In addition, ODU held a total of eleven neighborhood litter pick-up and data collection events in neighborhoods adjacent to campus.

D. **MCM 3 - Illicit Discharge Detection and Elimination**

Attached (Attachment B) is a letter that ODU sent to the City of Norfolk Environmental Programs coordinator in 2015 acknowledging that ODU’s storm sewer system is interconnected with the city’s storm sewer system. ODU also maintains regular contact with the City of Norfolk to exchange pertinent information related to respective MS4 service areas and any potential illicit discharges.

The Environmental Health and Safety Office performed an annual screening of nine outfalls and five nodes during dry weather conditions. The parameters used to screen each of the outfalls and nodes were: wet/dry, general condition, odor present, sheen present, debris present, and general condition comments. There were no significant findings. Attached (Attachment C) is a copy of the Dry Weather Inspection.

ODU did not perform any sampling or monitoring beyond the Dry Weather Inspection of outfalls and nodes. ODU’s lack of potential for harmful illicit discharges due to limiting bulk storage of materials that have a potential for releases as well as the monitoring that occurs with relation to fuel storage and dispensing has rendered sampling of outfalls unwarranted. This will remain open to modification should any of ODU’s processes change such that sampling of outfalls becomes necessary.

ODU did not experience any reports of a suspected illicit discharge during this reporting period.

E. **MCM 4 - Construction Site Stormwater Runoff Control**
The City of Norfolk served as both the VSMP and VESCP authority for Old Dominion University. Stormwater Master Plans and all E&S Control Plans are submitted for review and approval prior to any land disturbing activities where permits are required. Going forward, the Department of Design and Construction will contract services for stormwater plan review, erosion and sediment plan review, and erosion and sediment control inspections. All records pertaining to erosion and sediment control inspections will be held in the Environmental Health and Safety Office. During this permit year ODU had one regulated land-disturbing activity take place on the campus. Following are the metrics related to the regulated land disturbance including total acreage and total number of inspections conducted by the City of Norfolk.

- Child Study Center
  - 0.56 acres
  - 36 inspections

The Environmental Health and Safety Office receives copies of all inspection records for review. While there were some minor infractions noted in various inspections, corrections were promptly made in each case and there were no enforcement actions taken on any of the sites. As of August 2018, Old Dominion University’s Annual Standards and Specifications were approved and will be followed henceforth.

F. MCM 5 - Post-construction Stormwater Management

ODU did not bring any new stormwater management facilities online during this permit year. There are three projects slated to be completed during the upcoming reporting year and associated management facilities will be added to the inventory at that time.

ODU performed a visual inspection of physical BMPs on 6/12/18 after a significant rain event that occurred on 6/11/18. The parameters that are checked include,

- Inlet/Outlet clearance
- Sign of erosion
- Stability of turf
- General debris
- Comments/Other observations

Attached (Attachment D) is a copy of ODU’s visual inspection report.

Nutrient Application Locations:

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</tr>
</tbody>
</table>
G. MCM 6 - Pollution Prevention/Good Housekeeping

Stormwater Pollution Prevention Plans (SWPPP)

After reviewing the campus activities and storage areas for potential major releases ODU did not note any particular areas that might be considered a “High Risk” for release to the storm sewer system. As a result of this assessment it was decided that a Stormwater Pollution Prevention Plan (SWPPP) that addressed the campus as a whole, with specific attention to ODU’s High-Priority Water Quality Issues, would be the most comprehensive tactic. ODU has taken the approach of considering the campus as one High Risk area and are developing a SWPPP for the entire campus focusing on vehicular pollutants, nutrient pollutants, litter and debris, and sediment deposition. The SWPPP was completed in August of 2016 and can be found at http://www.odu.edu/life/sustainable/stormwater-management

The Daily Activities noted by ODU that require operational summaries are as follows:

• Lawn Maintenance
  Lawn maintenance (cutting/trimming) activities are controlled by the Grounds Divisions of Facilities Management. All clippings and trimmings are collected and stored for composting. All materials gathered are put in a designated dumpster and the dumpster is taken by a contractor to be composted.

• Nutrient Application
  Nutrient Management (fertilizing) is dictated by ODU’s Nutrient Management Plan. A link to the Plan (revised 2015) can be found at http://www.odu.edu/content/dam/odu/offices/environmental-health-safety/docs/nutrient-management-plan.pdf. Activities that contribute to the prevention of illicit discharges are covering of any grated storm drain inlets in the fertilizing areas and blowing any residual fertilizer off of impervious surfaces back on to the intended target lawn or bed.
  • Old Dominion University is required to have a Nutrient Management Plan in place to cover all 173.5 acres, of which approximately 20.75 acres are managed with nutrients.
  • All personnel who apply nutrients passed the Virginia Certified Fertilizer Applicator Exam.

• Fleet Maintenance
  University vehicles are maintained twice annually by the Motor Pool Department and they are checked for any leaking fluids. ODU has a work order system in place so that operators or individual departments can request service if any leaks develop in the interim. Any spills of automobile fluids are reported to the Environmental Health and Safety Office and cleaned up immediately. During this reporting year, there were no reports of spilled hydrocarbon products from ODU fleet or visitor vehicles.
• Motor Pool personnel have attended Spill Prevention Control and Countermeasure training as well as Storage Tank Operator training.

• Car Washing
Washing of most university vehicles is done in a closed wash bay that has a drain connected to the sanitary sewer. Public Safety Vehicles are driven on to an impervious membrane for washing and the waste water is collected for disposal by a contractor. No vehicles are washed on impervious surfaces that may lead to the ODU storm sewer system.

• Litter Control
Litter control is an ongoing, daily battle. The Grounds Division and Housing and Resident Life collect waste from all campus areas on a daily basis. Grounds has four full-time dedicated employees who collect debris from all areas around campus and Housing Housekeeping personnel focus on areas surrounding the dormitories daily.

• Parking Lot Maintenance/Street Sweeping
Street and lot sweeping is done on a weekly basis and after significantly attended campus events such as football games. Refuse collected is sent to the landfill unless it is leaves, which are added to the green waste recycling program as compostable material.

• Bulk Storage
Bulk storage of materials such as salt, pesticides and fertilizers is done at indoor or covered facilities to prevent the potential for runoff. Materials such as topsoil, sand, or mulch are only ordered on an as-needed basis and covered with tarps to prevent runoff during storage.

• Training
Stormwater Pollution and Prevention (SPP) training has been incorporated with the training that the Environmental Health and Safety Office provide to all Facilities Management employees who receive Hazard Communication Training. These employees are reasonably expected to work with or come in contact with hazardous materials through the course of their work assignments. The SPP training consists of topics related to the regulatory history of stormwater laws, point source and non-point source pollution, current Virginia regulations on stormwater pollution prevention, pollution prevention control measures, structural and non-structural best management practices that ODU employs, litter control, spill control techniques, and who to notify if they are involved in or witness an illicit discharge. Sessions were held in June where 79 affected employees attended. Future training sessions will be made available online for affected personnel as well as those with general interest in pollution prevention. The overall objective of the training is to impress the importance of preventing illicit discharges to the storm sewer system and to promote reporting of any noted discharges. The training is held at a minimum of every two years.

• Illicit Discharge Detection and Elimination (IDDE)
ODU developed an IDDE as a requirement of the National Pollutant Discharge Elimination System (NPDES) in May of 2008. ODU contracted for the revision of the IDDE in August of 2016 to reflect changes in our infrastructure that have occurred over the past eight years. The revised IDDE Plan can be found at
The purpose of this program is to implement a campus wide strategy to find, fix, and prevent illicit discharges.

All affected department managers were briefed on their responsibilities with regard to pollution prevention activities and signed off on respective activities with the plan.

H. MS4 Program Plan

ODU will continue to undertake the same activities stated above for MCM1 through MCM 6 during the next reporting cycle, while exploring other activities that may make the control measures more robust. Changes that have occurred to our program over the past year was the acceptance of renewed Annual Standards and Specifications, and the continued implementation of our Stormwater Pollution Prevention Plan.

I. BMP Assessment

Old Dominion University has assessed the appropriateness of efforts related to each of the minimum control measures listed in the General Permit. Reports of spills and potential illicit discharges from faculty, staff and city officials supports that ODU’s efforts detailed in MCMs 1 through 6 are suitable and effective means of identifying and preventing illicit discharges to the storm sewer system.

J. Program Plan Modifications

Old Dominion University’s program plan has been modified by the addition of our Annual Standards and Specifications which were approved by the Central Office in September of this year. ODU also developed and implemented a Stormwater Pollution Prevention Plan to target the prevention of illicit discharges from the four identified high priority water quality issues. Each plan can be found for review at a

K. Expected Control Measures

<table>
<thead>
<tr>
<th>Building</th>
<th>BMP</th>
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<tr>
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</tr>
<tr>
<td></td>
<td>Filterra</td>
</tr>
</tbody>
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Attachments enclosed:

- A – Volunteer Sign-up sheets for Litter Collection and Adopt-A-Stream Events
- B – Storm Sewer Interconnectivity Letter
- C – Dry Weather Storm Sewer Inspection
- D – Physical BMP Inspection Spreadsheet