



# OLD DOMINION UNIVERSITY

**OFFICE OF ENVIRONMENTAL HEALTH AND SAFETY**  
5255 Hampton Blvd. + Spong Hall, Suite 2501 + Norfolk,  
Virginia 23529  
Phone: (757) 683-4495 + Fax: (757) 683-6025

*Occupational Safety & Health + Environmental Health +  
Laboratory Safety + Industrial Hygiene + Radiation Safety +  
Hazardous Waste + Pollution Prevention*

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David Taylor  
MS4 Permits and Compliance  
Coordinator Department of  
Environmental Quality Tidewater  
Regional Office  
5636 Southern Blvd  
Virginia Beach, Virginia 23462

October 1, 2023

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 2022
3. Annual Standards and Specifications were revised and submitted
4. No new MS4 outfalls were added during the permit year
5. Signed certification attached (Attachment F)

## **R 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: 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 affects two departments on campus: University Grounds and Athletic Grounds. There are nine individuals who are qualified as Certified Fertilizer Applicators (CFAs). Eight are affiliated with University Grounds and one with Athletic Grounds. Each are certified to apply fertilizers to University and Athletic grounds who follow guidelines set forth in our current Nutrient Management Plan, revised 2022. Each member of Grounds attended Stormwater Management Class during this reporting year. The training, offered by the Environmental Health and Safety Office, is an online module, Safe Colleges, that covers stormwater management issues including pollution prevention and best management practices. The training was delivered to twelve employees on November 15 and November 17, 2022. ODU will continue to deliver the training in accordance with the permit in an effort to better inform our frontline stormwater employees.

- 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, students, and contractors. ODU uses several methods for informing the affected population of this potential and the importance of reporting any illicit discharges. Transportation and Parking Services has moved to virtual parking pass purchasing for nearly all sales of parking passes. As a result, ODU has decided to distribute hard copies for any in-person interactions, and we added the link to our Stormwater Management page to the online purchase site sent to faculty, staff, and students. This year there were 29,279 parking passes sold online to ODU faculty, staff, and students. Additionally the Department of Human Resources puts informational pamphlets in each New Employee Packet given to new hires. This year ODU hired 450 new employees during the 2022/2023 reporting year. All pamphlets have information regarding what constitutes an illicit discharge and how to notify the Environmental Health and Safety Office if they witness a release. The Environmental Health and Safety Office also places markers at each storm drain inlet that state "Only Rain Down the Storm Drain". The Environmental Health and Safety Office mainline phone number was included to the markers so that illicit discharges can be reported in a timelier manner. ODU also displays public service announcements over the information screens of Webb Student Center that are visible by the public in several locations within the facility. This year we continued the public service announcements to dormitories with CCTV and displayed posters in dormitories that do not have those monitors. The pamphlet and community education contacts provide information on how to identify and report illicit discharges.
- 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 and how they can be reported to the Environmental Health and Safety Office.
- 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 noted in our Annual Standards and Specifications, by DEQ Certified third party contractors. ODU's Department of Design and Construction has two full time employees who conduct site inspections as part of their daily responsibilities. Reports of erosion and sediment control inspections are forwarded to the Environmental Health and Safety

Office for review and record keeping. The Project Managers for each site respond to any recurring problems noted in the reports of erosion and sediment control activities. This was not necessary with any land disturbing activities during this permit year.

In the coming year, ODU will use the same outreach efforts, including the link to our Stormwater Page for Parking Pass Purchases and public service announcements targeted to faculty staff and students who frequent the campus. We are confident that these outreach and education efforts within the campus community will continue to provide a broader audience than in previous years.

ODU's MS4 Program Plan is available to the public at <https://www.odu.edu/life/sustainable/stormwater-management>. There were no comments received from the public concerning the program plan and no changes made to the MS4 Program Plan. There were no reports of potential illicit discharge during the permit 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>
- 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>
- 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>
- Public Participation - this metric is met by several different means. ODU usually holds a minimum of four Adopt-A-Stream events annually. This year we held three Adopt-A-Stream events to clean debris from shorelines adjacent to the Elizabeth River and Lafayette River. Additionally, we had volunteers replace storm drain markers around campus for newly installed drop inlets as well as those that have been removed due to weathering.

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

Attached (Attachment A) is a table of our three outfalls that includes the HUC Code, a description of the outfall, the receiving waters, predominant land use of the areas drained, latitude and longitude, and associated TMDLs. There were no changes to the map of coverage area or outfalls. Below the table is a map of the MS4 coverage area. Also attached (Attachment B) is a map of the stormwater management facilities owned by ODU.

ODU notified the City of Norfolk Environmental Programs Coordinator On June 26, 2023 to reaffirm that ODU's storm sewer system is interconnected with the city's storm sewer system. Attached (Attachment C) is a copy of the letter. 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 three outfalls and five nodes during dry weather conditions. The parameters used to screen each of the outfalls and nodes were wet/dry, odor present, sheen present, debris present, and general condition comments. There were no significant findings. Attached (Attachment D) 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 receive any reports of illicit discharges during the permit year. Typically any reports of spills on campus lands are reported by the Grounds Division as they are trained to identify and report spills to the Environmental health and Safety Office, and have daily coverage of the entire campus.

#### **E. MCM 4 - Construction Site Stormwater Runoff Control**

ODU's Department of Design and Construction hires a design team including civil engineers who develop the site plan, Stormwater Plan, and Erosion and Sediment (E&S) Control Plan. Both the Stormwater Plan and E&S Control Plan are submitted for review and approval. All land disturbing activities greater than 2,500 square feet are required to follow the instructions listed in ODU's Annual Standards and Specifications and be approved by a DEQ Certified third party. Land disturbances greater than one acre require a DEQ issued General Virginia Pollution Discharge Elimination Systems Permit. During this permit year ODU had two regulated land-disturbing activities take place on the campus. The following includes metrics related to the regulated land disturbances including total acreage and total number of inspections conducted by DEQ-certified third-party contractors.

- New Health Sciences Building
  - o 5.2 Acres
  - o 58 erosion and sediment inspections
- Health and Wellness Center
  - o 1.1 Acres
  - o 46 erosion and sediment 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 no enforcement actions were required. Each report is reviewed, and recurring issues are reported to the Project Managers to be promptly corrected. There were no recurring problems with E&S inspections during the permit year.

#### **F. MCM 5 - Post-construction Stormwater Management**

1. Two new stormwater management facilities were added to the MS4 during

the permit year associated with our New Chemistry building and Dominion House residence hall. Additionally, Old Dominion University purchased nutrient credits to meet 2023 nutrient reduction requirements.

ODU performed a visual inspection of physical BMPs on 3/16/23 after a 0.49" rain event that occurred on 3/13/23. The parameters that are checked include:

1. Inlet/Outlet clearance
2. Sign of erosion/stability of turf
3. General debris
4. Comments/Other observations

Attached (Attachment E) is a copy of ODU's visual inspection report.

2. Summary of Offsets Provided by Existing BMPs:

Name/Description	Reduction Means/Methods	NPV Removal Required (lb/yr)	TSS Removal Efficiency	TP	TN	TSS
Computational Sciences Building	Bioretention Basin	0.21	0.55	0.05	0.14	9.82
Lot 42	Hydrodynamic Separator	0.68	0.1	0.18	0.04	5.90
43rd Street Parking Garage	Hydrodynamic Separator	0.56	0.1	0.14	0.03	4.81
Oceanography and Physical Sciences Building	Wet Pond	6.08	0.6	1.57	1.30	315.07
Wrestling Addition	Infiltration Basin	0.00	0.95	0.00	0.00	0.00
Tennis Center	Bioretention Basin	1.76	0.55	0.46	1.20	83.81
Physical Sciences Building	Filterra System	0.19	0.8	0.05	D.13	13.18
Student Recreation Center	Bioretention Basin	0.64	0.55	0.17	0.44	30.58
Student Recreation Center	Filterra System	0.25	0.8	0.07	1.17	17.57
Student Recreation Center	Hydrodynamic Separator	0.31	0.1	0.08	0.02	2.68
Quad Student Housing	Cistern	0.00	0	0.00	0.00	0.00
Gornto Teletechnet Building	Wet Pond	1.24	0.6	0.32	0.26	64.25

Constant Hall	Hydrodynamic Separator	0.30	0.1	0.08	0.02	2.61
Garage E	Cistern	0.00	0	0.00	0.00	0.00
Student Success Center	Bioretention Basin	0.25	0.55	0.07	0.17	12.08
Dragas Hall	Bioretention Basin	0.68	0.55	0.18	J.47	32.47
Diehn Fine and Performing Arts	Bioretention Planter	a.so	0.55	0.13	0.34	23.78
New Art Building	Filterra System	0.11	0.8	0.03	0.08	7.69
Systems Research and Academics Building	Bioretention Basin	0.86	0.55	0.22	0.59	0.77
New Art Studio Building	Filterra System	0.17	0.8	0.05	0.12	12.08
College of Education	Bioretention Basin	1.07	0.55	0.27	0.73	50.59
College of Education	Pervious Pavers	0.30	0.59	0.08	0.19	15.39
Football Stadium	Pervious Pavers	2.43	0.55	0.76	5.46	368.44
New Chemistry	Pervious Pavers	2.12	2.40	1.31	9.36	522.05
Owens House	Bioretention Basins	1.76	2.20	0.44	3.70	128.76
	<b>SUM</b>	<b>21.14</b>	<b>15.99</b>	<b>6.88</b>	<b>25.00</b>	<b>1770.15</b>
	<b>Permit Cycle POC Required Reduction</b>			<b>1.59</b>	<b>5.85</b>	<b>735.38</b>
	<b>Surplus POC Reduction</b>			<b>3.54</b>	<b>6.09</b>	<b>383.96</b>

		Additional Reductions from Nutrient Credit Purchase		
Permit Cycle	Removal	POC Removal		
		TP	TN	TSS
2023	<b>Total Removal Required</b>	<b>13.01</b>	<b>47.94</b>	<b>6009.50</b>
	Offsite Nutrient Credit Purchase	13.43	134.88	10295.24
2023	<b>Total Removal Achieved</b>	<b>13.43</b>	<b>134.88</b>	<b>10295.24</b>

\*Offsite Nutrient Credit Purchase meets 2023 Requirements (2028 Requirements to be met over the next permit cycle)

- There are two ongoing projects slated to be completed during the upcoming reporting year and associated management facilities will be added to the inventory as each comes online.

Name/Description	Reduction Means/Methods
New Health Sciences	Permeable Pavers Bioretention Basin
Health and Wellness Center	Permeable Pavers

These projects were still under construction during the permit cycle.

#### G. MCM 6 - Pollution Prevention/Good Housekeeping

##### Stormwater Pollution Prevention Plans (SWPPP)

Annual assessment of the campus activities and storage areas for potential major releases ODU did not note any 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 have developed 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>. Annual review of Daily Activities is performed to ensure specific departmental activities are still proceeding as written in the Program Plan. An inspection of our Facilities



Management building and surrounding equipment storage areas resulted in no significant findings. No modifications to the SWPPP have been made during the permit year.

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 2022) 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 the 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 19.65 acres are managed with nutrients.
- All personnel who apply nutrients have passed the Virginia Certified Fertilizer Applicator Exam.
- **Nutrient Application Locations:**

<b>Location</b>	<b>Latitude</b>	<b>Longitude</b>
Soccer Field	36.883975	-76.310912
Soccer Practice Field	36.883603	-76.311987
Whitehurst Field	36.885539	-76.315139
Baseball Field	36.883919	-76.308999
Kaufman Mall	36.886539	-76.304909
Williamsburg Lawn	36.88992	-76.303745
Runte Quad	36.886007	-76.310011
VMASC	36.869353	-76.418136
Tri-Cities	36.869109	-76.417063

- **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. Car Washing of most university vehicles is done in a closed wash bay that has a drain connected to the sanitary sewer. 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 daily. 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 in 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. Training sessions are now available online through the Safe Colleges online training platform 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 for affected employees.
- **Illicit Discharge Detection and Elimination (IDDE)**  
ODU developed an IDDE as a requirement of the National Pollutant Discharge Elimination System (NPDES) the most recent revision of the IDDE was performed in August of 2020 to reflect changes in infrastructure that have occurred since 2016. The addition of all utilities was included in the update. This program will be updated in the coming permit year. The updated IDDE includes new buildings and structures, above ground improvements, and below ground utilities. 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 MCM 1 through MCM 6 during the next reporting cycle.

**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 revision of our Annual Standards and Specifications which are currently awaiting approval. 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 <http://www.odu.edu/life/sustainable/stormwater-management>.

**K. Expected Control Measures**

Building	BMP
New Health Sciences	Permeable Pavers and Dry Retention Basin
Health and Wellness Center	Permeable Pavers

Additionally, Old Dominion University has completed a topographical map of land elevations that is being utilized to update the Stormwater Master Plan which is in draft. Once the plan is completed in late 2023, ODU will contract for services to complete one or more stormwater improvement projects to reduce our pollutant loads to meet the 2028 reduction requirements.

**L. Chesapeake Bay TMDL Action Plan Implementation**

There are currently no local TMDL action plan requirements for ODU beyond the requirements of the Chesapeake Bay TMDL Action Plan. The updated

ODU TMDL Action Plan was developed by Vanasse Hangen Brustlin, Inc. in September of 2023. The Pollutants of Concern reductions were met for the first permit cycle.

**Attachments enclosed:**

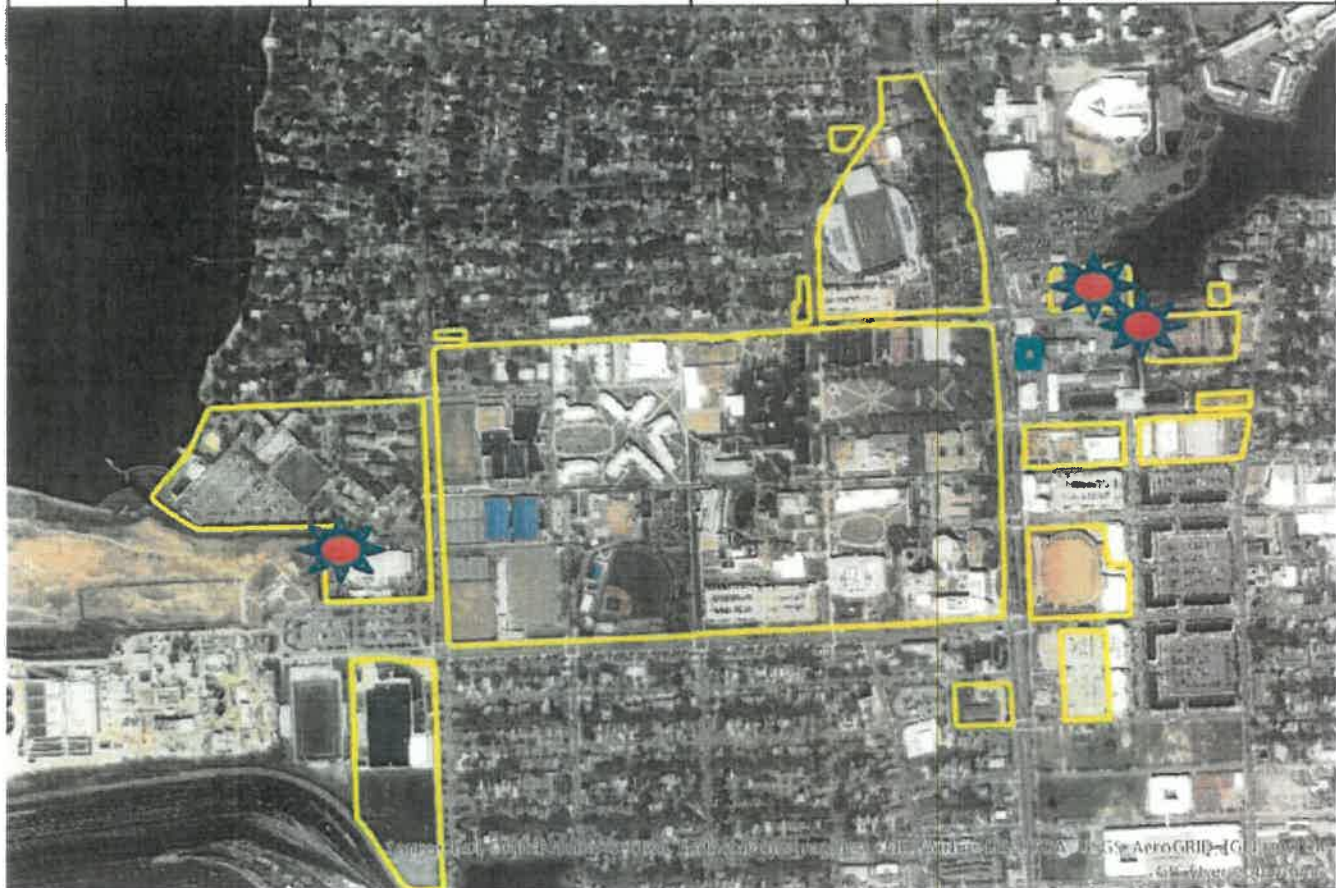
- A - Map of Coverage Area and Outfalls
- B - Stormwater BMP Map
- C - Storm Sewer Interconnectivity Letter
- D - Dry Weather Inspection
- E - Physical BMP Inspection
- F - Certification Statement

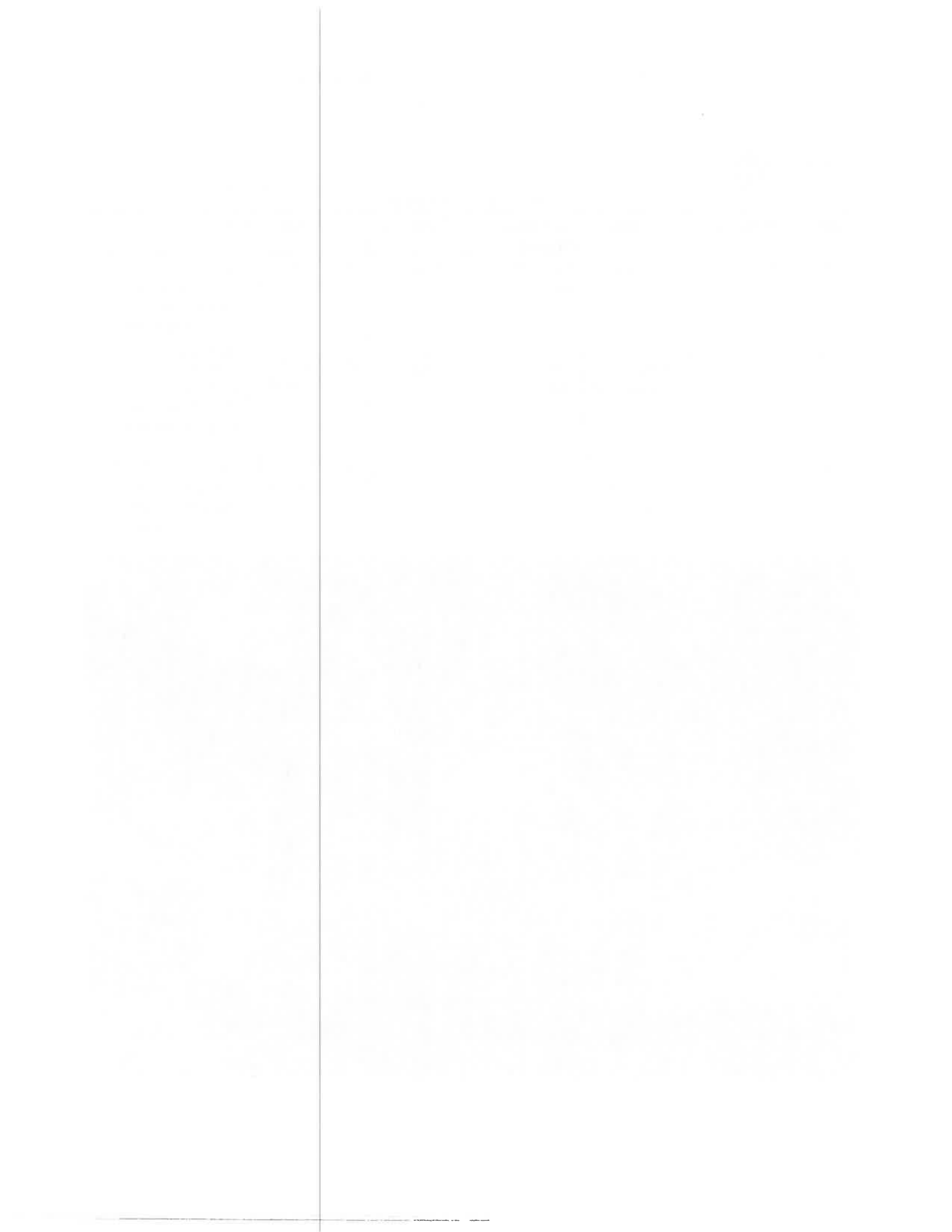


**Attachment A - Map of Coverage Area and Outfalls**  
**HUC 020802**

**Outfalls -** 

<b>Storm Water Outfalls</b>						
<b>Outfall</b>	<b>Descriptions</b>	<b>Location</b>	<b>Receiving Waters</b>	<b>Land Use</b>	<b>Lat / Long</b>	<b>TMDL</b>
#1	78" ERPC	Powhatan Ave	Elizabeth River	Urban/ Athletic Fields	36°53'5.00"N/ 76°18'51.42"W	Enterococci, Total Nitrogen, Total Phosphorus, and Total Suspended Solids
#2	60"x 42"	Behind Rogers Hall	Lafayette River	Urban	36°53'18.58"N/ 76°18'3.75"W	Enterococci, Total Nitrogen, Total Phosphorus, and Total Suspended Solids
#3	(2)48" RCP	Crossing 49 <sup>th</sup> Street beside Rogers Hall	Lafayette River	Urban	36°53'16.31"N/ 76°18'0.57"W	Enterococci, Total Nitrogen, Total Phosphorus, and Total Suspended Solids

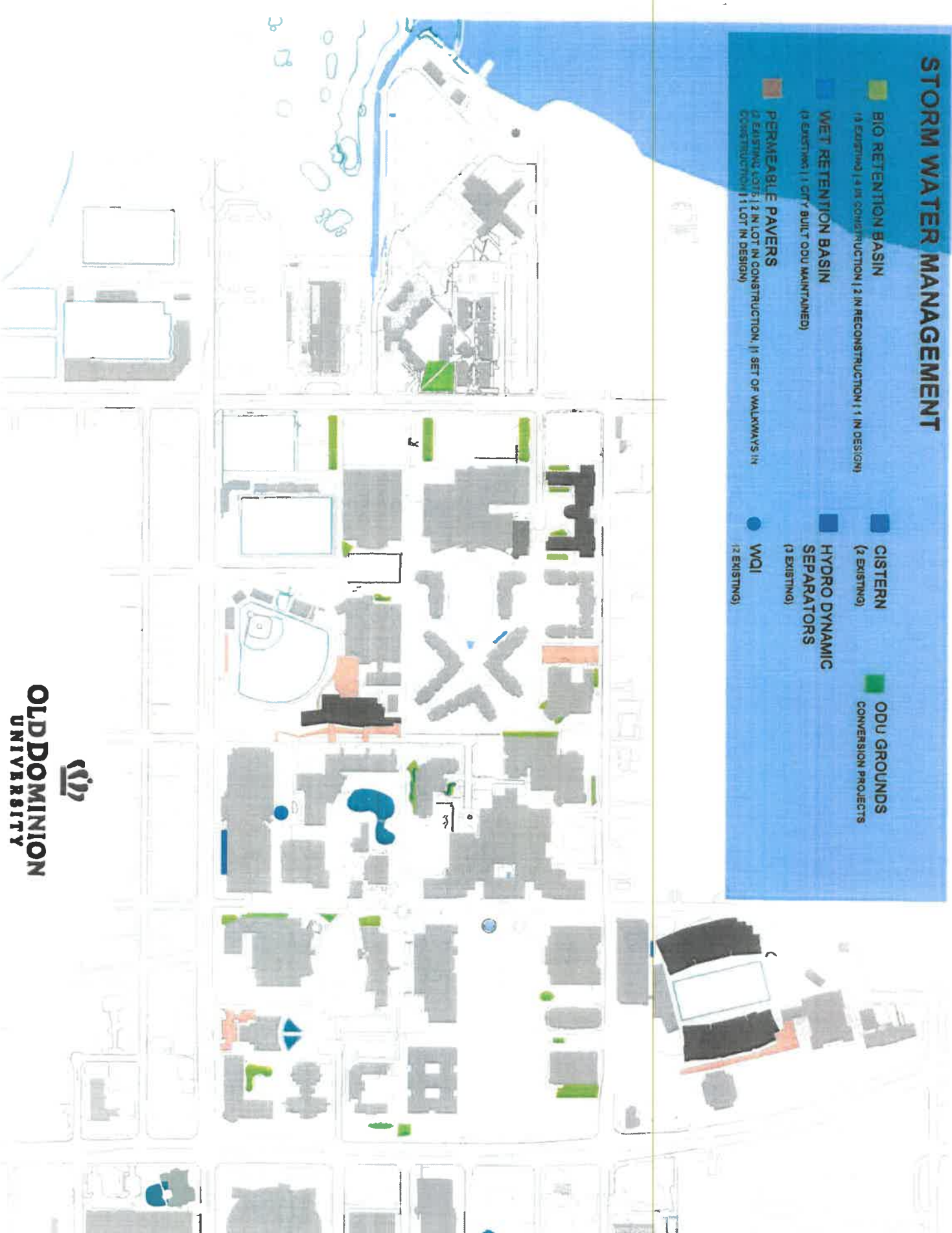






# STORM WATER MANAGEMENT

- BIO RETENTION BASIN**  
1 EXISTING | 4 IN CONSTRUCTION | 2 IN RECONSTRUCTION | 1 IN DESIGN
- WET RETENTION BASIN**  
(2 EXISTING | 1 CITY BUILT ODU MAINTAINED)
- PERMEABLE PAVERS**  
12 EXISTING | 23 IN LOT IN CONSTRUCTION, 11 SET OF WALKWAYS IN CONSTRUCTION | 1 LOT IN DESIGN
- CISTERN**  
(2 EXISTING)
- ODU GROUNDS CONVERSION PROJECTS**
- HYDRO DYNAMIC SEPARATORS**  
(2 EXISTING)
- WQI**  
(2 EXISTING)





# Dry Weather Inspection List

Attachment C

Date: April 12, 2023

List of Known Storm Water Outfalls / Nodes								
Descriptions	Location	Type	Wet/ dry	Condition	Odor	Sheen	Debris	Comments
78" ERPC	Powhatan Ave	Outfall	tidal	good	none	none	none	Always wet in creek (tidal)
60"x 42"	Behind Rogers Hall	Outfall	tidal	good	none	none	none	Always wet (tidal)
(2)48" RCP	Crossing 49th Street beside Rogers Hall	Outfall	tidal	good	none	none	none	Always wet (tidal)
Grate	Out front of Webb stairs, Facing Lionden at corner of Constant hall. 10 ft from Webb	Node	Dry	good	none	none	none	
Manhole cover	49th Street in between Dragas Hall and Visual Art Center on side walk next to road	Node	Dry	good	none	none	none	
Manhole cover	Corner of Kaufman Hall adjacent to Greek rock and 3ft from side walk facing open field.	Node	Dry	good	none	none	none	
Grate	Road side entering child study parking lot	Node	Dry	good	none	none	none	



BMP	Location	Inlet/Outlet	Erosion	Stability	Debris	Comments
Wet Retention Basin	Oceanography Building	good	none	good	none	
Vortech	Whitehurst Parking Lot #42	good	N/A	N/A	Some	Vortechs are vacuumed by contractor annually - debris is hand filled.
Vortech	Constant Hall Parking Garage 43rd Street	good	N/A	N/A	Some	
Wet Retention Basin	Gornto Telechnet	good	none	good	none	
Bio-retention Basin	EC&S	good	none	good	none	
Bio-retention Basin	Indoor Tennis Center	good	none	good	none	
Infiltration Trench	Wrestling	good	none	good	none	
Filterra	Physical Sciences	good	none	good	none	Serviced twice annually to remove debris and place mulch
Filterra	Student Recreation Center	good	none	good	none	
Cistern	Roseann Runte Quad	good	N/A	N/A	N/A	
Cistern	Game Day Building	good	N/A	N/A	N/A	
Dry Detention Basin	Student Success	good	N/A	good	none	
Bio-retention Basin	Dragas Hall	good	none	good	none	
Bio-retention Basin	Diehn Fine Arts	good	none	good	none	
Filterra	New Art Building	good	none	good	none	Serviced twice to remove debris and replace mulch
Bio-retention Basin	Engineering Systems	good	none	good	none	
Filterra	Hixon Art	good	none	good	none	Serviced twice annually to remove debris and place mulch
Bio-retention Basin	New Education	good	none	good	none	

Permeable Pavers	New Education	good	none	good	none	Vaccuumed by facilities
Bio-retention Basin	Child Study	good	none	good	none	
Permeable Pavers	Football Stadium	good	none	good	none	
Bio-retention	SRC Turf North	good	none	good	none	
Bio-retention	SRC Turf South	good	none	good	none	
Bio-retention	Dominion House	good	none	good	none	
Permeable Pavers	New Chemistry	good	none	good	none	



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**I D E A F U S I O N**

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5255 Hampton Blvd. ♦ Spong Hall, suite 2501 ♦ Norfolk, Virginia 23529  
Phone: (757) 683-4495 ♦ Fax: (757) 683-6025

*Occupational Safety & Health ♦ Environmental Health ♦ Laboratory Safety ♦ Industrial  
Hygiene ♦ Radiation Safety ♦ Hazardous Waste ♦ Pollution Prevention*

Attachment E

June Whitehurst  
Assistant Storm Water Engineer  
City of Norfolk  
Public Works Operations  
2233 McKann Avenue  
Norfolk, VA 23509

June 26, 2023

Ms. Whitehurst:

This letter is to reaffirm to you that Old Dominion University (ODU) possesses a Municipal Small Storm Sewer System permit, permit # VAR040078. One of the requirements of this permit is that we are obligated to notify you of the interconnection of ODU's storm sewer system to that of the City's storm sewer system. Please feel free to contact me at your convenience should you have any questions or concerns regarding any aspects of our system or permit requirements.

Sincerely,

Douglas Alexander  
Director, Environmental Health and Safety  
Old Dominion University  
[dalexand@odu.edu](mailto:dalexand@odu.edu)  
(757)683-4495

