



MICHIGAN DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

## No Exposure Certification (NEC) Compliance Assistance Lidded Leak Proof Containers and Compactors

*State of Michigan Industrial Storm Water Program*

Water Resources Division (WRD)  
EGLE Environmental Assistance Center 800-662-9278

[Michigan.gov/EGLE](http://Michigan.gov/EGLE)

Generally regulated facilities that manage industrial materials in containers and compactors onsite will need to obtain a National Pollutant Discharge Elimination System Industrial Storm Water Permit. However, lidded leak proof containers and compactors containing waste or recyclable materials may meet the definition of “no exposure” if the containers are managed so that no material can drain, spill, leak, or otherwise be released from the containers. Due to the difficulty in meeting and maintaining a condition of “no exposure” for these items, it is recommended that facilities seek input from EGLE WRD Industrial Storm Water Program staff, if these items are managed at the facility. It is important to understand that any material lost during handling, or by loading containers onto vehicles for transport, is considered exposed. In addition, industrial refuse and trash that is stored uncovered is considered exposed. Below are some examples to assist you in determining your compliance with the No Exposure Certification.

### *Refuse Compactors*

#### Acceptable Compactors and Management Practices



The pictures above identify completely contained, leak proof compactors with no material spillage or hydraulic oil leaks.

**Unacceptable Compactors and Management Practices**



Both pictures above identify material spillage and poor housekeeping practices around the compactors.



The picture on the left identifies leaking hydraulic oil issues and the picture on the right shows a non-leak-tight compactor due to rusting conditions.

*Metal Scrap Containers, Recyclable Material Containers, Refuse Containers, Etc.*

**Acceptable Containers and Management Practices**



Both pictures above are examples of lidded and leak proof containers with no material spillage exposed to storm water runoff.



The picture on the left is an example of containers stored in a storm-resistant shelter. The picture on the right shows an acceptable method for loading a container onto a truck for transport. Notice the container is not tipped during the loading sequence.

### Unacceptable Containers and Management Practices



The picture on the left identifies a roll off container with a swinging rear door. These types of containers will typically allow fluids to be released from the container. The picture on the right shows a container that is leaking fluids.



The picture on the left identifies spilled materials at the container storage area and the picture on the right shows a roll off container being tipped during loading. Tipping roll off containers with swinging rear doors typically allows fluids to be discharged from the container.

*For information or assistance on this publication, please contact the Water Resources Division through EGLE Environmental Assistance Center at 800 662 9278. This publication is available in alternative formats upon request.*

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