

**Lidded Leak-Proof Containers and Compactors**  
**No Exposure Certification Compliance Assistance**  
*State of Michigan Industrial Storm Water Program*

Michigan Department of Environmental Quality (MDEQ)  
Water Resources Division (WRD)  
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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 MDEQ-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.

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

**Acceptable Containers**



Lidded and leak proof container with no material spillage.



Store containers under a storm resistant shelter.



Acceptable method for loading a container onto a truck for transport (the container is not tipped during loading).

**Unacceptable Containers**



Roll-off containers with swing doors.



Any releases from containers.



Spilled material around the container.



Tipping the container during loading for transport.

**Refuse Compactors**

**Acceptable Compactors**



Completely contained, leak proof compactor with no material spillage or hydraulic oil leaks.

**Unacceptable Compactors**



Material released from compactor.



Leaking hydraulic oil.



Rusted out compactor.