NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM (NPDES) POLLUTION PREVENTION PLAN AND BEST MANAGEMENT PRACTICES (BMPs)

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EXHIBIT 1 ..... SITE PLAN MAP

FOREWARD

This document has been prepared in compliance with the following regulations:

FEDERAL
Federal Water Pollution Control Act of 1972 (P.L. 92-500) as amended by the Clean Water Act of 1977 (P.L.95-217) as amended by the Water Quality Control Act of 1987 (P.L. 100-4). [U.S.C. 1251 et. seq.].

STATE
Michigan
Michigan Act 245, Public Acts of 1929, as amended, (the "Michigan Act"), storm water associated with industrial activity, as defined under 40 CFR 122.26(b)(14)(I-ix) and (xi) or under Section 402(p)(2)(E) of the Act.

These regulations were designed to minimize pollution to the rainwater and snowmelt that run off the earth's surface and enter our Nation's rivers, lakes, streams.

This Pollution Plan describes the actions taken by USA Lamp & Ballast Recycling, Inc / Cleanlites Recycling (USA Lamp / Cleanlites) to ensure the elimination of stormwater discharge.

POLLUTION PREVENTION TEAM

USA Lamp / Cleanlites is located in Mason, Michigan. Below please find the members of the pollution prevention team, their position and appropriate responsibilities:

TEAM LEADER

Name:	Michael T Kimmel
Title:	General Manager, Operations / VP, Transportation Safety & Compliance Officer
Office Phone:	517-676-0044
Cell Phone:	517-204-7111
Responsibilities:	Signatory Authority. Develops and implements NPDES/BMPs at all facilities. Coordinates all employee training programs. Keeps all records and ensures reports are submitted. Oversees inspections, notes any process changes, spill response coordinator.

TEAM MEMBER

Name:	Josh Blom
Title:	Shop Foreman
Office Phone:	517-676-0044
Responsibilities:	Responsible for Good Housekeeping aspects of plan, ensures plan is implemented. Assists with inspections and training.

GOALS OF POLLUTION TEAM

It is the goal of the pollution prevention team to:

- Implement all general permit and pollution prevention plan requirements;
- Be Aware of any changes that are made in plant operation to determine the need to update the Storm Water Pollution Prevention Plan;
- Maintain communication between plant management and operations to ensure a cooperative partnership.

Existing Environmental Management Plan

USA Lamp / Cleanlites currently has in place a Hazardous Waste Contingency Plan and Emergency Procedures which meet the requirements of 40 CFR 265 Subpart C and 40 CFR 265 Subpart D. These plans also incorporate the requirements of Rule 323.1162 of part 5 of Part 31 of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended: Spillage of Oil and Polluting Materials.

SITE PLAN

Attached as Exhibit 1, please see the site plans for the facility. The Site Plan shows the discharge points, drainage patterns, direction of flow, proximity to water bodies and significant materials exposed to storm water.

MATERIAL INVENTORY

USA Lamp / Cleanlites – Mason, MI

Material:	Fluorescent Lamps
Purpose:	To Be Recycled
Location:	Plant area, storage and staging areas
Quantity:	Not more than 45,000 lamps stored at any one time
Quantity Exposed in Last 3 Years:	NONE
Likelihood of Contact with Storm Water:	NONE. Lamps are delivered via the Dock or Overhead doors, directly into the facility
Past Significant Spill or Leak:	NONE
Material:	PCB and Non-PCB Ballast
Purpose:	Stored until sent to a recycling location
Location:	Plant Ballast Storage Area
Quantity:	Not more than 50 drums stored on site at any one time
Quantity Exposed in Last 3 Years:	NONE
Likelihood of Contact with Storm Water:	NONE. All ballasts are received in sealed 55-gallon drums. Ballasts are delivered via the Dock or Overhead Doors.
Past Significant Spill or Leak:	NONE
Material:	Calcium Phosphate Powder
Purpose:	By-Product from lamp recycling process.
Location:	Storage Area in Plant
Quantity:	Not more than 24,000 pounds stored at any one time
Quantity Exposed in Last 3 Years:	NONE
Likelihood of Contact with Storm Water:	NONE. Powder is stored indoors in sealed 55-gallon drum containers. Moved onto trucks via overhead doors.
Past Significant Spill or Leak:	NONE
Material:	Universal Waste Batteries
Purpose:	Stored until sent to a recycling location
Location:	Plant, Battery Area
Quantity:	Not more than 45,000 pounds stored on site at any one time
Quantity Exposed in Last 3 Years:	NONE
Likelihood of Contact with Storm Water:	NONE. Batteries are stored in sealed 55-gallon drums or 5-gallon poly-pails until sorted. After batteries are sorted, the batteries are stored in gaylord boxes in the plant area until shipment. There is no likelihood of contact with storm water as there are not any storm drains in the warehouse and the shipments are moved via the loading dock onto trucks.
Past Significant Spill or Leak:	NONE

	MATERIAL INVENTORY USA Lamp / Cleanlites – Mason, MI
Material:	Scrap Metal
Purpose:	To Be Recycled
Location:	Under Portico
Quantity:	40 yard roll-off
Quantity Exposed in Last 3 Years:	NONE
Likelihood of Contact with Storm Water:	NONE
Past Significant Spill or Leak:	NONE
Material:	Empty Drums
Purpose:	For Re-use
Location:	Under Portico and in trailer
Quantity:	1 Semi-Load
Quantity Exposed in Last 3 Years:	NONE
Likelihood of Contact with Storm Water:	NONE
Past Significant Spill or Leak:	NONE
Material:	Pallets / Dunnage
Purpose:	For Re-use
Location:	Outside Parking Lot
Quantity:	1 Semi-Load
Quantity Exposed in Last 3 Years:	All
Likelihood of Contact with Storm Water:	NONE
Past Significant Spill or Leak:	NONE

SITE EVALUATION SUMMARY

USA Lamp / Cleanlites – Mason, MI

The Pollution Prevention Team has performed an assessment of the USA Lamp / Cleanlites facility prior to commencing operations at the site. The Team has determined the following regarding the various material handling and storage activities which take place at this facility:

Office Building

Team members reviewed the Office Building and determined that it would be extremely unlikely to have a stormwater discharge or spill in this location.

Plant Storage and Recycling Area

Team members reviewed the floor plan of the storage building. It was noted that the storage area has an epoxy floor covering and that there were not any drains located in the storage facility. PCB ballasts will be stored in 55-gallon sealed drums on spill pallets. USA Lamp / Cleanlites will not take delivery of PCB-leaking ballasts. By the same token, batteries will be stored in 55-gallon drums, 5-gallon poly-pails or in gaylord boxes. Wet lead acid batteries will be stored on spill pallets. Calcium phosphate powder will be stored in sealed 55-gallon drums in the storage area. The Team believes that there is no likelihood of discharge to the stormwater. Please review the Spill Response Plan for specifications on spill procedures.

The Recycling Area was inspected for exposure and the potential for leaks or discharge of stormwater. The recycling facility is entirely enclosed, has no floor drains and the floor is epoxy sealed. The intact lamps are stored on wooden pallets until processed. Recycled cardboard is baled and moved to the appropriate storage location.

Portico Storage Area

Cleanlites Mason has a covered 1,500 square foot portico area in the back of their building (please see attached diagram). This area was specifically designed to store material with little exposure to the elements. Recycled metals that are captured in gaylord boxes, are sealed and stored in the portico storage area until sent to a scrap metal recycler for reclamation. The non-hazardous glass generated from the recycling of fluorescent lamps is stored in 21 yard roll-off containers, in the portico storage area (please see diagram). Each roll-off is lined with a 3 mill poly-liner and covered with an industrial tarp. Exposure to the elements is minimal and the Team feels that the glass has a low probability of spill or discharge to stormwater. Pallets, empty 55-gallon drums, and other containers are stored in the portico area.

BEST MANAGEMENT PRACTICES

The minimization of pollution, exposure and spills is a goal held by all USA Lamp / Cleanlites Management puts forth the best effort to ensure environmental safety and health. Below please find the BPMs that USA Lamp / Cleanlites has instigated to meet the strict environmental requirements of the company.

BMPs	Activities
Good Housekeeping	Ensured that all materials are stored inside. Material drop-offs will occur only at the dock, which is completely sealed, or via the overhead doors, directly into the storage area. All staff is trained in basic cleanup procedures (sweeping loading and unloading areas) as well as trained in spill response and procedures.
Preventative Maintenance	All drums, pails and boxes are inspected daily. All materials are placed in aisles, labeled and stored in a safe manner. Complete set of Preventative Maintenance procedures is implemented in corporate records.
Inspections	All containers, drums, pails, and boxes are inspected daily. Any material not is compliance is immediately handled (recycled, new drums, etc.). Spill pads are inspected weekly. A detailed log is kept on site indicating inspector, equipment, results and correction steps.
Spill Prevention Response	Please see attached Spill Prevention and Response Plan
Sediment and Erosion Control	
Management of Runoff	
Additional BMPs	USA Lamp / Cleanlites is dedicated to ensuring its facilities are managed in a safe manner. Each employee is trained in all areas of pollution prevention.

EMPLOYEE TRAINING
NPDES/BPM

Employees
Plant Management
Operators
Truck Drivers

Pollution Prevention Training - New Hires
All new hires will be required to go through extensive pollution prevention training

Refresher Training
Refresher training will be held addressing:

- Good housekeeping
- Spill prevention and response procedures
- Materials handling and storage

Training Topics

1. Good Housekeeping
    - Review and demonstrate basic cleanup (sweeping and vacuuming) procedures
    - Clearly indicated proper disposal locations
    - Post signs in materials handling areas reminding staff of good housekeeping procedures
    - Be sure employees know where routine clean-up equipment is located
2. Spill Prevention and Response
    - Clearly identify potential spill areas and drainage routes
    - Post warning signs in spill areas with emergency contacts and telephone numbers
    - Drill on Spill clean-up procedures
    - Post the locations of spill clean-up equipment and the persons responsible for operating the equipment
3. Materials Handling and Storage
    - Be sure employees are aware which materials are hazardous and where those materials are stored
    - Point out container labels and aisle spacing
    - Explain recycling practices
    - Emphasis is placed on USA Lamp / Cleanlites dedication to a clean and safe workplace

Meeting Frequency
Meetings will be held monthly to discuss:

- Any environmental/health and safety incidents
- Upcoming training sessions
- Brief reminders on good housekeeping, spill prevention and response procedures, and material handling practices
- Announce any changes to the plan
- Announce any new management practices

SWPPP CERTIFICATION

The permit requires that the SWPPP shall be reviewed and signed by the Certified Storm Water Operator(s) and by either the permittee or an authorized representative in accordance with 40 CFR 122.22. The SWPPP shall be retained on-site at the facility which generates the storm water discharge.

I certify under penalty of law that the storm water drainage system in this SWPPP has been tested or evaluated for the presence of non-storm water discharges either by me, or under my direction and supervision. I certify under penalty of law that this SWPPP has been developed in accordance with the General Permit and with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. At the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Permittee or Authorized Representative	
Printed Name & Title: Michael T Kimmel, GM / Safety & Compliance Officer	
Signature & Date: Michael T Kimmel	4/14/14

Certified Storm Water Operator	
Printed Name & Certification Number: Michael T Kimmel, I-06753	
Signature & Date: Michael T Kimmel	4/14/14

23.0 ANNUAL SWPPP REVIEW REPORT FORM

Facility Information		
Designated Name: Cleanlites Recycling - Mason	Certificate of Coverage No.: MIS310411	
Facility Contact Information		
Name: Mike Kimmel	Telephone No.: 517.676.0044	
Email Address: mikek@cleanlites.com		Certification No: I-06753
Backup Facility Contact Information		
Name: Tom Kimmel	Telephone No.: 517.676.0044	
Email Address: cleanlites@cleanlites.com		Certification No: N/A
Certified Operator Information		
Name: Michael T Kimmel	Telephone No.: 517.676.0044	
Email Address: mikek@cleanlites.com		Certification No: I-06753

SWPPP Review Checklist

1) Facility general information is current and accurate	Yes	No	
2) Site map is current and accurate	Yes	No	
3) Significant material inventory is current and accurate	Yes	No	
4) New exposures, processes and related controls have been documented appropriately in the SWPPP	Yes	No	NA
5) Spills have been recorded and reported as appropriate	Yes	No	NA
6) Employee SWPPP training was conducted and documented	Yes	No	
7) Records of routine preventative maintenance and housekeeping inspections are available in the SWPPP file	Yes	No	
8) Comprehensive site inspections have been completed, certified and filed in the SWPPP file	Yes	No	
9) Corrective actions noted in the inspection reports have been completed	Yes	No	
10) SWPPP has been reviewed and signed by the Certified Storm Water Operator and the Permittee or designated representative	Yes	No	

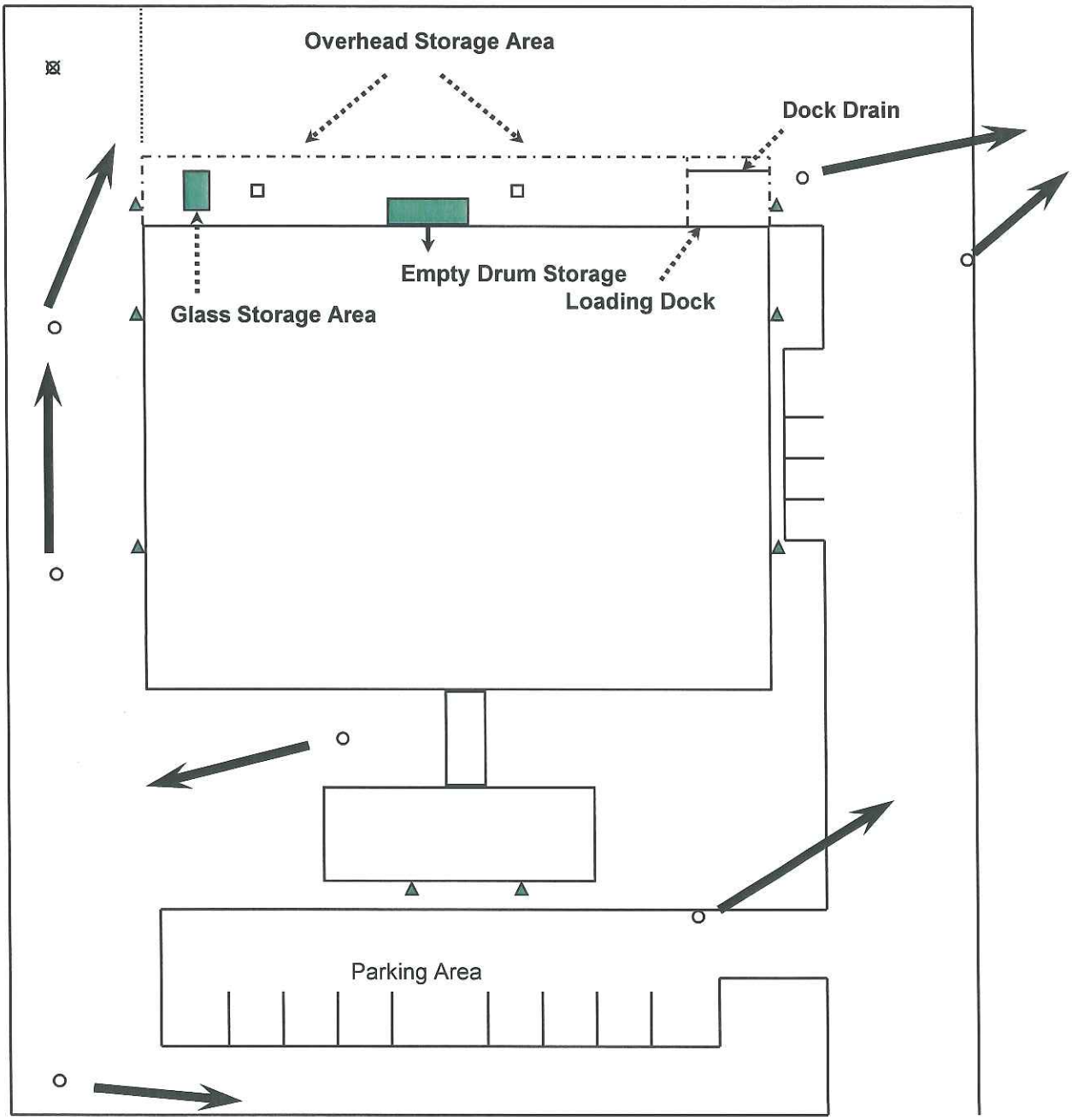
Additional Comments (use additional sheets if necessary):

I certify that the above information is correct	
Name: Michael T Kimmel, Sr Vice President	Signature / Date: Michael T Kimmel 1/9/14

SUBMIT THIS FORM TO THE DISTRICT OFFICE IDENTIFIED ON YOUR CERTIFICATE OF COVERAGE ON OR BEFORE **JANUARY 10TH** OF EACH YEAR

Exhibit 1

STORMWATER SITE PLAN



Legend

- ▲ Downspout
- ○ Non-municipal storm water inlet
- ⊠ Sanitary Manhole
- □ Dry Sump storm waster inlet
- -.- Overhead Storage Area

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STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

May 21, 2013

Michael T. Kimmel
2650 Baseline Road
Stockbridge, MI 49285

Your application for certification renewal as a Storm Water Management Operator has been received. With the recommendation of the Board of Examiners and with the authority granted by the Department of Environmental Quality, you are hereby granted a continuance of your of Storm Water Industrial Site Operator Certification.

Your replacement certificate is printed at the bottom of this page. Your certificate number is **I- *06753***. This certification will remain valid until July 1, 2018. Please retain this certificate on file as your record of certification.

A certified operator who changes his/her address must notify the Operator Training and Certification Unit within 30 days of the change. Please contact Bruce Lack, 517-373-4755 to report address changes.

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY

This is to certify that

Michael T. Kimmel

is qualified under the rules governing certification to operate any facility listed under the classification

STORM WATER MANAGEMENT – INDUSTRIAL SITE

A-1i

CERTIFICATE NO. I- **06753** EXPIRES JULY 1, 2018

Issued by the Director of the Department of Environmental Quality
Under Authority of Act 451 P.A. 1994, Part 31 as amended

EQC 3450-1 (Rev 1/21/2010)