SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

USA LAMP & BALLAST RECYCLING, INC.
DBA CLEANLITES RECYCLING, INC.

665 Hull Road
Mason, MI 48854

March 2016

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USA LAMP & BALLAST RECYCLING, INC.
DBA CLEANLITES RECYCLING, INC.
Mason, MI

MANAGEMENT COMMITMENT [40 CFR §112.7(d)(2)]

The USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc., Mason, MI facility supports the objectives of this Spill Prevention, Control, and Countermeasure Plan, and will provide the resources (labor, equipment, materials, and funds) necessary to implement it. This SPCC Plan has the full approval of management.

Michael Kimmel — 4/11/16

Michael Kimmel
Operations Manager

Date

PROFESSIONAL ENGINEER CERTIFICATION

In accordance with [40 CFR §112.3(d)] I hereby certify that:

a. **I am familiar with the requirements of 40 CFR §§112 - Oil Pollution Prevention.**
b. **I, or my agent, has visited and examined the facility.**
c. **This Plan has been prepared in accordance with applicable industry standards and good engineering practices.**
d. **Procedures for required inspection and testing have been established, and**
e. **The plan is adequate for the facility.**

David G Dempsey — 04/08/2016

David Dempsey, P.E.
South Carolina Registration No. 5712
USA Lamp & Ballast Recycling, Inc. / Cleanlites Recycling
195 Ben Abi Rd.
Spartanburg, South Carolina 29307

Date

SPILL PREVENTION, CONTROL AND COUNTERMEASURE

PLAN COMPLIANCE REVIEW [40 CFR §112.5(b)]

I have completed a review and evaluation of the SPCC Plan for the USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc., Mason, MI, and ***will / will not*** *(circle one)* amend the plan as a result.

Michael Kimmel

Primary Coordinator

4/11/16

Date

SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc. Mason, MI

1.0 INTRODUCTION

This document is the Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) for the USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc. facility in Mason, MI (Cleanlites). This Plan describes measures the facility takes to prevent oil discharges to the navigable waters of the United States. The Plan focuses on prevention and control measures to be followed to minimize potential impacts in the event a spill occurs, and to assure appropriate internal and external reporting. The Plan is prepared according to requirements that appear in 40 CFR §112.7. Copies of this Plan are kept on file at the Cleanlites facility.

2.0 GENERAL FACILITY INFORMATION

Facility Name:	USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc., Mason, MI
Facility Owner:	USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.
Mailing Address:	P.O. Box 212 Mason, MI 48854
Physical Address:	665 Hull Road Mason, MI 48854
Telephone/Fax Numbers:	Telephone: 517-676-0044 Fax: 571-
Facility Management:	Michael Kimmel, Senior Vice President
Environmental Management:	Michael Kimmel, Senior Vice President

3.0 PLAN ADMINISTRATION

Responsibility for day-to-day administration of the SPCC Plan and all discharge prevention activities is assigned to the Primary Coordinator. The individual assigned this responsibility, along with contact information, is listed in Appendix C.

3.1 Plan Certification [40 CFR §112.3(d), and 40 CFR §112.5(c)]

40 CFR §112.3(d) requires that the SPCC Plan be reviewed and certified by a registered professional engineer who is familiar with the facility and its operation. 40 CFR §112.5(c) requires that amendments to the Plan also be certified by a Professional Engineer. The professional engineer's certification for the Plan will appear on a separate page at the beginning of the Plan.

3.2 Plan Availability [40 CFR §112.3(e)]

A current printed version of the Plan will be maintained and available in the office of the Primary

Coordinator.

3.3 Plan Amendments [40 CFR §112.4, and 40 CFR §112.5(a)]

The Primary Coordinator, assigned to administer the Plan, is responsible for initiating, tracking and implementing Plan amendments. Two types of Plan amendments are described in the Part 112 Rules:

Amendments Required by EPA [40 CFR §112.4]

If more than 1,000 gallons of oil are spilled into navigable waters in a single discharge event, or more than 42 gallons in each of two discharge events within any 12-month period, a report shall be submitted to EPA within 60 days of the triggering discharge event. The report shall include:

- Name of the facility;
- Name of Person submitting the report;
- Location of the facility;
- Maximum storage capacity of the facility and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of the facility including maps, flow diagrams, and topographical maps;
- The cause of the discharge including a failure analysis;
- Additional preventive measures to minimize recurrence; and,
- Other information as may reasonably be required.

If the EPA determines that the Plan is inadequate, amendments may be required.

Amendments by Facility [40 CFR §112.5(a)]

The facility will amend the Plan whenever a change occurs that materially affects the potential to discharge oil to navigable water. The Plan will be amended within six months of the change. The amended Plan will be implemented as soon as possible, but no later than six months after the Plan is amended.

3.4 Periodic Plan Review [40 CFR §112.5(b)]

The Plan will be reviewed and evaluated at least once every five years as required by 40 CFR §112.5(b). If proven prevention and control technologies are identified in the review/evaluation that will significantly reduce the likelihood of a spill event, the Plan will be amended within six months of the review. Any amendments will be implemented as soon as possible, but not later than six months after the amendment.

Periodic reviews will be appropriately documented. The Primary Coordinator will maintain appropriate documentation of the status of any items being addressed as a result of the review. As required by §112.5(b), a signed certification shall be added to the Plan that attests whether the Plan

will be amended as a result of the review. The review certification page will appear at the beginning of this Plan.

All technical amendments will be certified by a professional engineer (P.E.).

If technical amendments are required, the Primary Coordinator is responsible for ensuring the amendments to the SPCC Plan are certified by a Registered Professional Engineer.

The following changes are not considered technical changes:

- Changes to the Contact List (Appendix C).
- More stringent requirements for storm water discharges to comply with NPDES rules.
- Phone numbers.
- Product changes if the new product is compatible with conditions in the existing tanks and secondary containment.
- Any other changes which do not materially affect the facility's potential to discharge oil.

The following changes are considered technical amendments:

- Commissioning or decommissioning containers.
- Replacement, reconstruction, or movement of containers.
- Reconstruction, replacement, or installation of piping systems.
- Construction or demolition that might alter secondary containment structures.
- Changes to product or service.
- Revision of standard operation or maintenance procedures at the facility.

4.0 GENERAL REQUIREMENTS [40 CFR §112.7]

General requirements for SPCC Plans are set forth in 40 CFR §112.7. Specific requirements for the types of oil stored at Cleanlites are described in 40 CFR §112.8 and §112.12. Each applicable requirement is discussed in the following sections. Information is presented in the sequence shown in 40 CFR §112.7. The location of any items not discussed in this sequence are clearly referenced. Some elements of Sections §112.8 and §112.12 duplicate items from Section §112.7, in which case further discussion or reference may not be provided.

4.1 Management Commitment [40 CFR §112.7]

Cleanlites is committed to provide the necessary resources (labor, equipment, materials, and funds) - to fully implement this SPCC Plan. Management's acknowledgement of this commitment will appear on the same page as the professional engineer's certification at the beginning of the Plan.

4.2 Conformance with Requirements, and Deviations [40 CFR §112.7(a)(1)-(2)]

Cleanlites is committed to conform to the requirements of the Oil Pollution Prevention rules. Any deviations from the requirements will be carried out in accordance with the procedures described at 40 CFR §112.7(a)(2) and §112.7(d). 40 CFR §112.7(a)(2) allows deviations from certain requirements if the facility explains the reason for the deviation in the Plan, and provides environmental protection equivalent to that which is called for in the rule. §112.7(d) identifies certain requirements from which deviations are allowed only if the facility has either a §112.20 Facility Response Plan (FRP), or a Part 109 Oil Spill Contingency Plan (OSCP), which is administered by local or regional authorities. The facility does not meet the criteria required for classification under the applicability of substantial harm criteria, per 40 CFR §112. Therefore, the facility is not required to develop a FRP, and a local or regional OSCP has not been formed. Refer to the signed certification form contained in Appendix A.

The facility does not serve as an oil production or workover facility (on or offshore). Therefore the provisions of 40 CFR §112 relevant to these facilities are not applicable to this plan.

4.3 Description and Physical Layout of the Facility [40 CFR §112.7(a)(3) and 40 CFR §112.7(a)(3)(i)]

Cleanlites facility is located at 665 Hull Road, Mason, MI 48854 (See Locator Map – Figure 1). Figure 1 also contains topographic and flood plain maps. An aerial photograph of the site may be found at Figure 2 and a plot plan of the site at Figure 3. A Facility Diagram is found at Figure 4.

Cleanlites is an environmental recycling firm that accepts Universal Waste for processing to make them more amenable for recycle. Items are sorted, disassembled, and repackaged to be sent to final recycling companies. Lamps are processed through a lamp crusher that separates the metal, glass, and powdered components for shipment to recycling facilities. The facility operates no on-site waste treatment.

The facility consists of two buildings, connected by a hall way, (See Figure 4) and the PCB Storage building. See Attachment 1.

The site is relatively level. Storm water on the south half of the site flows to a storm water collection system. Spills in this area are highly unlikely as the PCB storage building is located in the north-west portion of the site. Storm water from this area flows to the north in a drainage ditch that runs along the west side of the facility. Flow from this ditch is to Sycamore Creek.

4.4 Facility Oil Storage and Use [40 CFR §112.7(a)(3)(i)]

Facility oil storage container information is provided in Table 1, which includes detailed information about each of the oil containers at the facility, including volume, content, location, and secondary containment information. Oil storage areas are further described in the following paragraphs.

PCB containing ballasts are stored in 55-gallon drums inside of the PCB storage building shown at Attachment 1. The built-in containment in the storage building is supplemented by the use of

containment pallets for all drums stored in the facility. In addition, the building sits on a concrete slab with a concrete curb around the building that directs any storm water run-off toward the paved driveway.

There are no other oils stored at the facility other that those discussed above.

There is no oil-filled operational equipment at the facility.

The facility neither ships nor receives any materials in tanker trucks.

The only regulated oil that may be parked overnight is that in truck fuel tanks.

4.5 Discharge Prevention Measures [112.7(a)(3)(ii)]

Measures the facility takes to prevent discharges include the following:

a. Employees receive training in the prevention of spills, as well as control and countermeasure procedures. Employee training records are maintained in Appendix D or kept on file with the SPCC Plan.

b. Monthly inspections are conducted to identify potential sources of spills before they occur. Inspection Records are maintained in Appendix E or kept on file with the SPCC Plan.

c. Written procedures are maintained and followed for loading and unloading operations for specific types of materials. A Unloading/Loading Checklist is presented in Appendix F.

d. Equipment is maintained in good condition to minimize the risk of an oil discharge due to equipment failure. A comprehensive preventative maintenance program is implemented. Preventative Maintenance records are maintained in Appendix E or kept on file with the SPCC Plan.

4.6 Discharge/Drainage Controls [112.7(a)(3)(iii)]

As shown in Table 1, all secondary containment structures are under roof to prevent unwanted discharges from entering the storm water system. Attachment 1 contains all technical information on the storage building and Attachment 2 contains information on the containment pallets.

Emergency spill control equipment is located at the in the rear of the production facility, which includes absorbent materials, petroleum absorbent pads and booms, protective clothing and gloves, and safety glasses. The contents of spill kits and sorbent materials are regularly inspected to assure they are adequate for spill containment and cleanup. Discharges resulting from a leak or spill would be contained using spill containment kits. The containment kits are used to capture spilled oil and prevent the oil from entering sanitary sewers and storm water outfalls. An oil release flowing toward the onsite storm water or sanitary sewer drainage system would be controlled with containment socks and absorbents.

4.7 Countermeasure for Discharge Discovery, Response, and Cleanup [40 CFR §112.7(a)(3)(iv) and §112.7(a)(5)]

Facility personnel are trained to readily identify spills and initiate appropriate countermeasures to prevent discharges into receiving waters. The plant's environmental alert and reporting procedures are presented in Appendix C. In the event facility personnel are not able to handle the response and cleanup work for a spill, contractors are readily available to assist. The contacts and phone numbers for these contractors are given in Appendix C.

4.8 Methods of Disposal of Recovered Materials [40 CFR §112.7(a)(3)(v)]

Discharged oil that is recovered through cleanup with absorbent material will be collected and properly disposed of according to applicable local and federal guidelines. Discharged oil that is contained and has no danger of reaching navigational waters will be recovered and disposed of according to applicable local and federal guidelines.

4.9 Contact List and Phone Numbers [40 CFR §112.7(a)(3)(vi)]

Contacts and phone numbers for all parties are required by §112.7(a)(3)(vi). This information is posted at various locations at the facility and is presented in Appendix C.

4.10 Discharge Reporting [40 CFR §(112.7(a)(4)]

The Environmental Alert Flow Chart (Appendix C) includes reporting instructions that conform to the requirements of §112.7(a)(4). If a major spill occurs, the spill control team leader will immediately notify the maintenance manager who will notify the Operations Manager, corporate level managers and appropriate outside agencies. If external reporting is required, the following information is to be provided: location and phone number of the facility, date and time of the discharge, type of material discharged, estimates of the amount discharged, source of the discharge, affected media (e.g. water, soil), cause of the discharge, an estimation of damages or injuries, actions used to stop or mitigate the effects of the discharge, whether an evacuation may be needed, and the names of individuals and/or organizations who have been contacted. Notifications will be documented on the Significant Spill Report form (Appendix B) and retained with the SPCC Plan.

4.11 Potential Spill Predictions of Direction, Rate of Flow and Quantities [40 CFR §112.7(b)]

As shown in Table 1, all secondary containment structures are under roof to prevent unwanted discharges from entering the storm water system. Potential spill predictions for bulk containers are discussed below. In addition, the storage building is located on a concrete base designed to direct any storm water flow toward the paved parking area.

4.12 General Containment/Diversion Controls [40 CFR §112.7(c)]

At a minimum, the facility is required to employ one of the containment/diversionary structures or equipment listed in §112.7(c) for each oil container shown in Table 1 to prevent discharges of oil into navigable waters. All bulk oil storage containers are located inside an enclosed structure that is

utilized for secondary containment provisions. Table 1 lists general secondary containment provisions for the oil storage container.

The PCB storage unit will consist of a 29'3"X5'6"X9'7" prefabricated hazardous waste storage building, model number 12PC, manufactured by Safety Storage. Details and specifications for this building are shown in Attachment 1. A diagram showing the location of the PCB storage unit with respect to the main building may be found at Figure 4. The prefabricated building provides adequate protection to prevent rain from reaching the stored PCB containing items.

The PCB storage unit secondary containment is designed to contain 25% of the total volume of all PCB articles stored. Though no spills are expected from the types of items Cleanlites intends to store, any spillage of PCBs or PCB containing items will be cleaned up in accordance with the PCB Spill Cleanup Policy found in 40 CFR 761 Subpart G.

All PCB containing items stored in this area will be in open head, 55 gallon drums with closed lids. All containers stored in the PCB Storage Unit will be checked for leaks at least every weekly.

The PCB Storage Unit and each drum containing PCB items will be marked as required by 40 CFR 761.40.

The entire Cleanlites facility is well above the 100 year flood water elevation. Flood Plain and Topographic Maps may be found at Figure 1.

4.13 Inspections, Tests, and Records [40 CFR §112.7(e)]

All bi-monthly inspection and testing records are to be filed with the SPCC Plan and are maintained in the office of the Primary Coordinator. All documentation will be maintained for at least three years using customary business practices.

Twice monthly, the following minimum inspection procedures are completed and recorded:

- Visually inspect storage areas for signs of leaks.
- Inspect all oil storage drums for signs of leaks and deterioration.
- Inspect closures and valves for signs of leaks.
- Inspect spill kits to ensure proper equipment is maintained.
- Inspect all plant equipment containing oil for signs of leaks.

The results of the bi-monthly inspections are signed by the inspector and maintained with the SPCC Plan for a period of not less than three years. All preventative maintenance and monthly inspection records are documented in Appendix E.

Day to day visual observations of storage vessels are conducted during routine operation processes. Personnel are instructed to report material damages or leakage of oils to the supervisor, immediately.

Any oil container that has permanent contact with the ground will be integrity tested on a regular schedule in accordance with API Standard Practices at least once every ten (10) years. Test results will be documented, signed by the certified inspector and maintained with the SPCC Plan.

Oil storage containers that are located inside the facility that are inspected monthly, and have no contact with ground surfaces, have minimal risk for internal corrosion or container failure. Because of this, hydrostatic testing, radiographic testing, ultrasonic testing, and/or acoustic emissions testing as listed in 40 CFR § 112.8(c)(6) are not recommended for these types of oil containers in this facility. Equivalent environmental protection will occur by visually inspecting these containers monthly using good engineering practices.

4.14 Personnel, Training and Discharge Prevention Procedures [40 CFR §112.7(f)]

The Primary Coordinator for Cleanlites has been designated as the oil spill prevention and control officer. The Primary Coordinator is responsible for implementing spill prevention and control measures and amending this SPCC Plan when necessary. In the event of a spill, the spill control team leader will immediately notify the Primary Coordinator who will notify the Operations Manager, corporate level managers and appropriate outside agencies.

All employees whose work is related to oil-handling are required to have annual training in the proper operation of their equipment for the prevention of oil discharge. This training highlights any past spill events or failures and recently developed precautionary measures; applicable pollution control laws, rules, and regulations; general facility operations including operation and maintenance of equipment; and, contents of the facility SPCC Plan.

Personnel responsible for unloading/loading oil products are required to immediately report spills during transfer operations to their supervisor. Employee training information is documented on the Employee Training form included as Appendix D.

Employees have been instructed to report any leaks or discharges to their appropriate supervisors. All supervisors and management personnel are aware of discharge reporting procedures.

4.15 Facility Security [40 CFR §112.7(g)]

Fencing and Gates

There is a chain link fence around the rear of the building with a gate that is locked when no one is at the plant. In addition, the doors to the PCB storage building are locked when not in use.

Flow valves

Cleanlites has no piping system

Starter controls

Cleanlites has no pumps requiring starters.

Tank loading/unloading connections

Cleanlites has no large bulk storage tanks. Cleanlites does not ship or receive materials in tanker trucks.

Facility lighting

Adequate lighting is provided for outside activities during hours of darkness. Lighting is controlled automatically with dusk to dawn sensors. Lighting is adequate to detect spills during hours of darkness and to prevent vandalism. No oil deliveries are accepted after dark.

4.16 Facility Loading/Unloading [40 CFR §112.7(h)]

Cleanlites loading and unloading operations are confined to movement of 55 gallon drums and/or smaller containers from trucks to the storage building and from the storage building to trucks. Lamp ballasts are generally shipped to Cleanlites from customers in varying size containers from 5 gallon pails to 55 gallon drums. PCB ballasts are shipped to TSCA approved PCB disposal facility in 55 gallon drums. See Appendix F for Unloading / Loading Lamp Ballast check list.

4.17 Brittle Fracture Evaluation [40 CFR §112.7(i)]

No field-constructed aboveground oil storage containers are located at Cleanlites; therefore, the provisions of 40 CFR §112 pertaining to these containers are not applicable to this Plan.

5.0 SPCC REQUIREMENTS FOR ONSHORE FACILITIES [40 CFR §112.8]

Subpart B, Section §112.8 outlines specific requirements that apply to petroleum and non-petroleum oils. The plant's conformance with these requirements is discussed below.

5.1 Facility Drainage [40 CFR §112.8(b)]

Drainage from diked secondary containment areas [40 CFR §112.8(b)(1)-(2]: All secondary storage structures are under roof, which prevents the accumulation of storm water within the secondary containment. In addition, all secondary containment structures have closed and locked doors that prevent unauthorized entry

Facility Drainage Systems (112.8(b)(3)-(5) and 112.12(b)(3)-(5)): Cleanlites has no drain system within the main production facility with the exception of sanitary sewer which flows to a municipal collection system.

Due to the facility's flat terrain, any spilled material located outside of the building will remain relatively stationary and should be easily contained and cleaned up

5.2 Bulk Storage Containers [40 CFR §112.8(c) and §112.12(c)]

PCB containing ballasts are contained in 55 gallon drums. Cleanlites has no other bulk containers on site that contain oil.

5.3 Facility Transfer Operations, Pumping and Facility Process [40 CFR §112.8(d) and §112.12(d)]

1. The facility does not conduct any pipeline or pumping

5.4 Facility Response Plans [40 CFR §112.20]

40 CFR §112.20 requires facilities with the potential to cause substantial harm to the environment as a result of an oil spill to develop and submit to EPA a Facility Response Plan. The facility does not meet the criteria required for classification under the applicability of substantial harm criteria, per 40 CFR §112. Refer to the signed certification form contained in Appendix A.

Table 1
Oil Storage Container Information

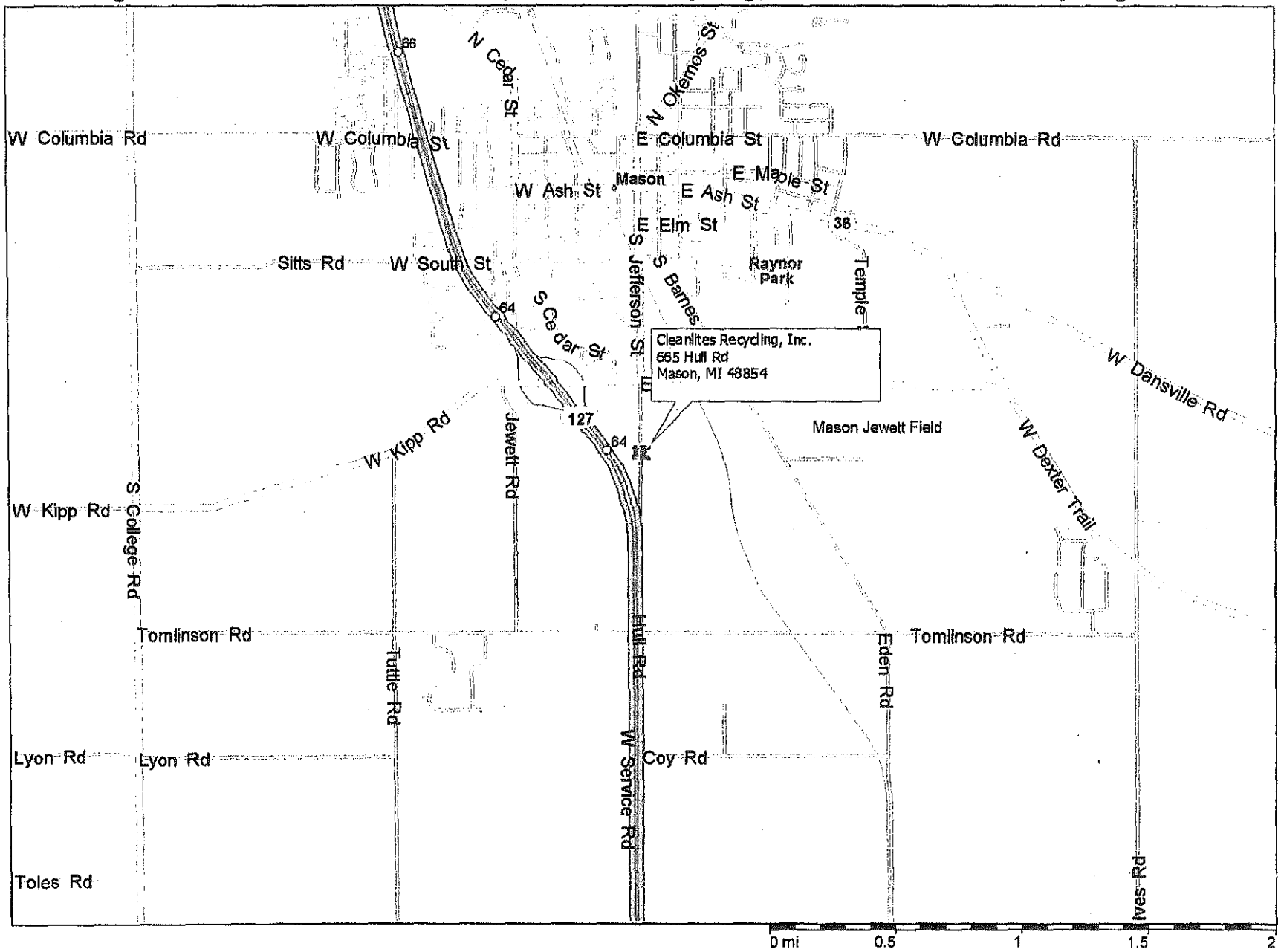
Container Name	Container Location[1]	Contents	Container Capacity, gallons[2]	Dedicated Secondary Containment? Yes/No[3]	Dedicated Secondary Containment Volume, gallons	Other General Containment System(s)[4] (Required unless dedicated containment provided)	Direction of flow from container[5] (process sewer or storm water outfall #)
PCB Storage Building	NW Corner of Production Building	Lamp Ballasts	1,760	Yes	Internal Containment	Curbed Concrete Pad	Paved parking area

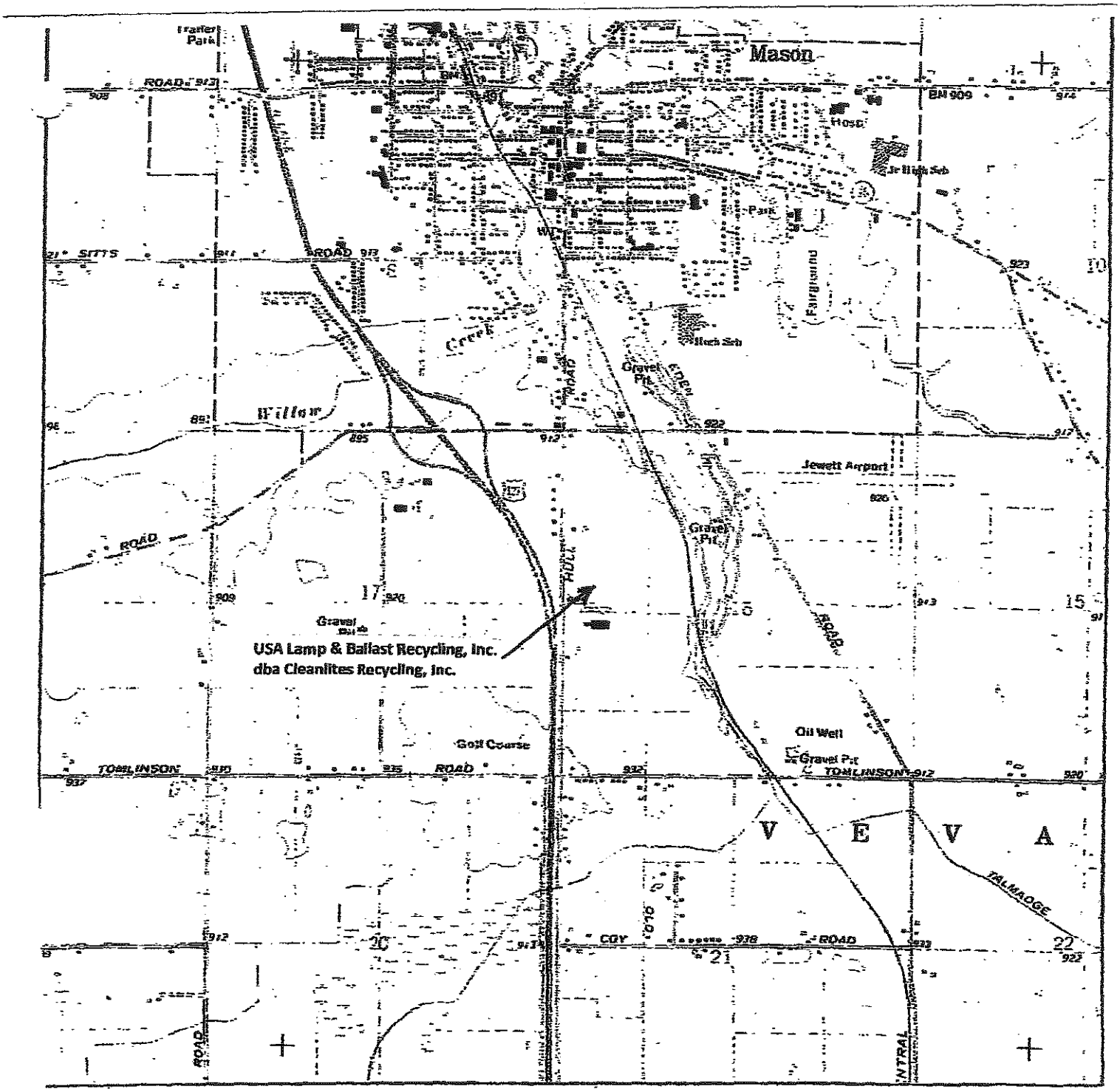
[1] Location is shown on site map.
[2] 48 ea 55 gallon drums containing lamp ballasts.
[3] Mandatory for bulk storage containers. Other types of containers must have either dedicated secondary containment or one of the other means of general containment from options listed at 112.7(c).
[4] General Containment Systems from 112.7(c): (i) Dikes, berms, retaining walls, (ii) curbing, (iii) culverting, gutters, or other drainage systems, (iv) weirs, booms, or other barriers (v) spill diversion ponds, (vi) retention ponds, (vii) sorbent materials, (viii) other equivalent system (describe).
[5] Occurs only if dedicated secondary containment fails or is bypassed.

FIGURE 1

Locator Map, Topographic Map and Flood Plain Map

Figure 1. Locator Map - USA Lamp & Ballast Recycling, Inc. dba Cleanlites Recycling, Inc.





N	TARGET QUAD NAME: MASON MAP YEAR: 1970 SERIES: 7.5 SCALE: 1:24000	SITE NAME: Cleanlites Recycling ADDRESS: 665 Hull Road Mason, MI 48854 LAT/LONG: 42.5629 / 84.443	

FEMA

Info

Scale: 4 %

LOMC: 06-05-B033V-260092

Help

Zoom Win

Pan

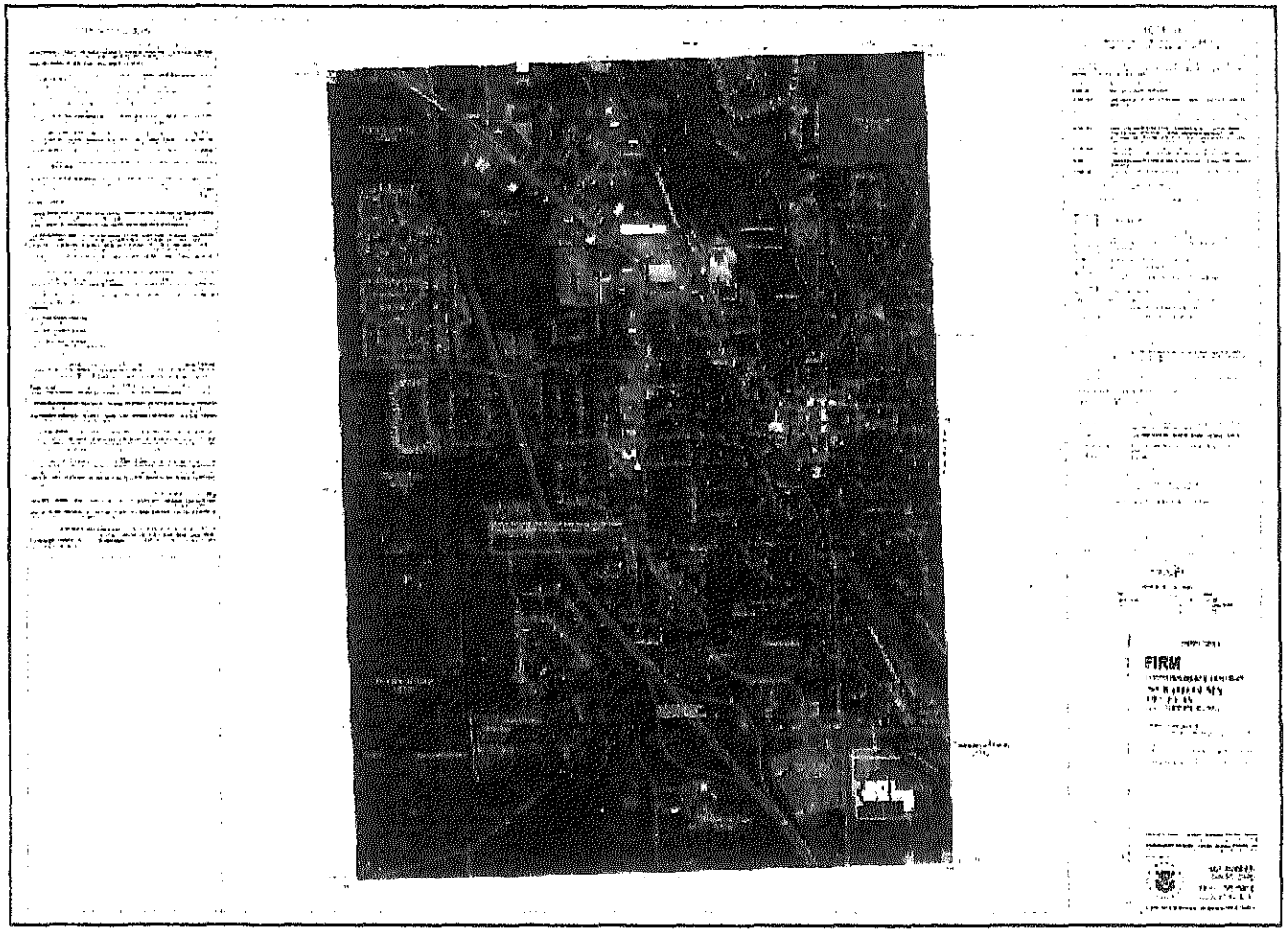
Zoom In

Zoom Out

1:1 Zoom In

MAX Zoom Out

Make a FIRMette



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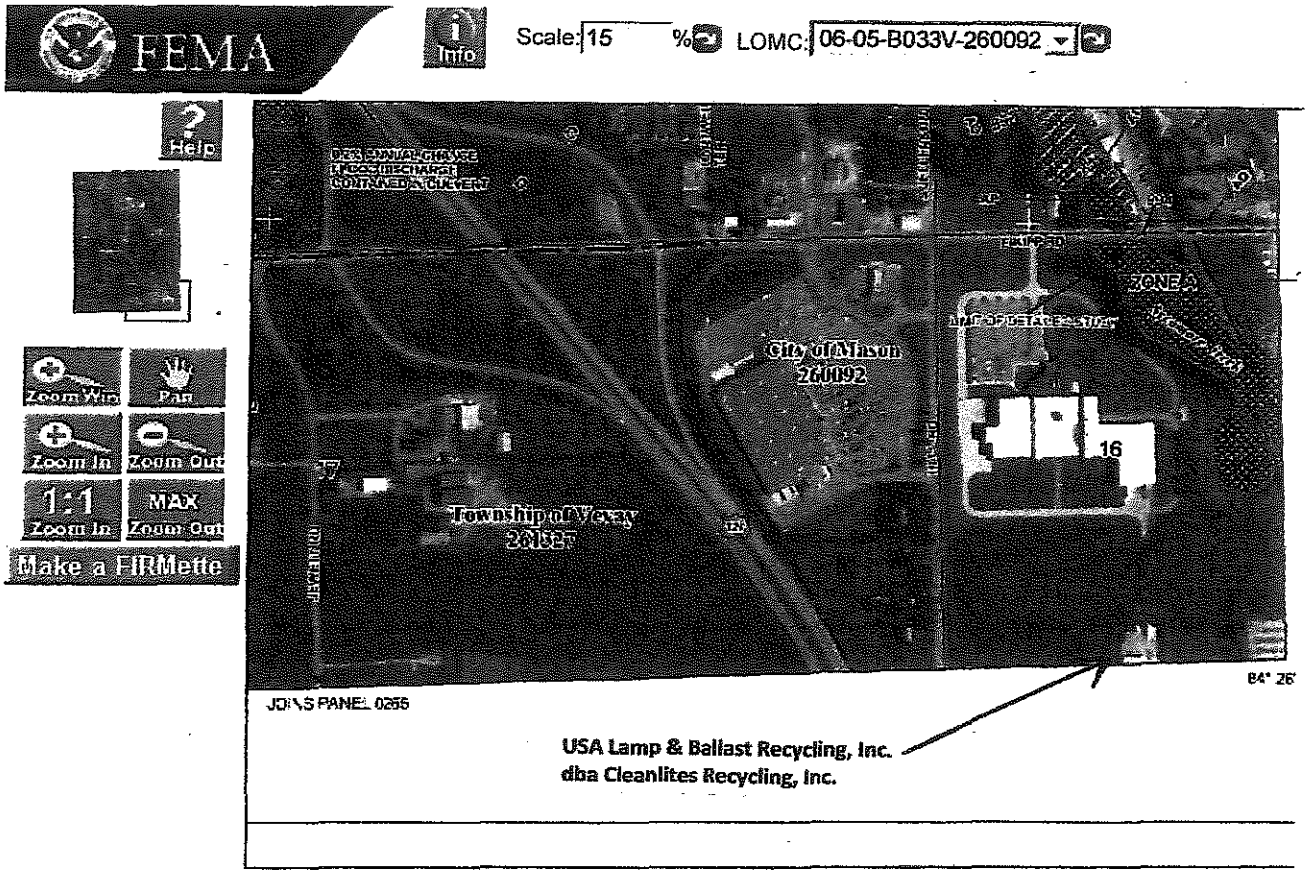


FIGURE 2

Aerial Photograph

Figure 2 Aerial Photograph

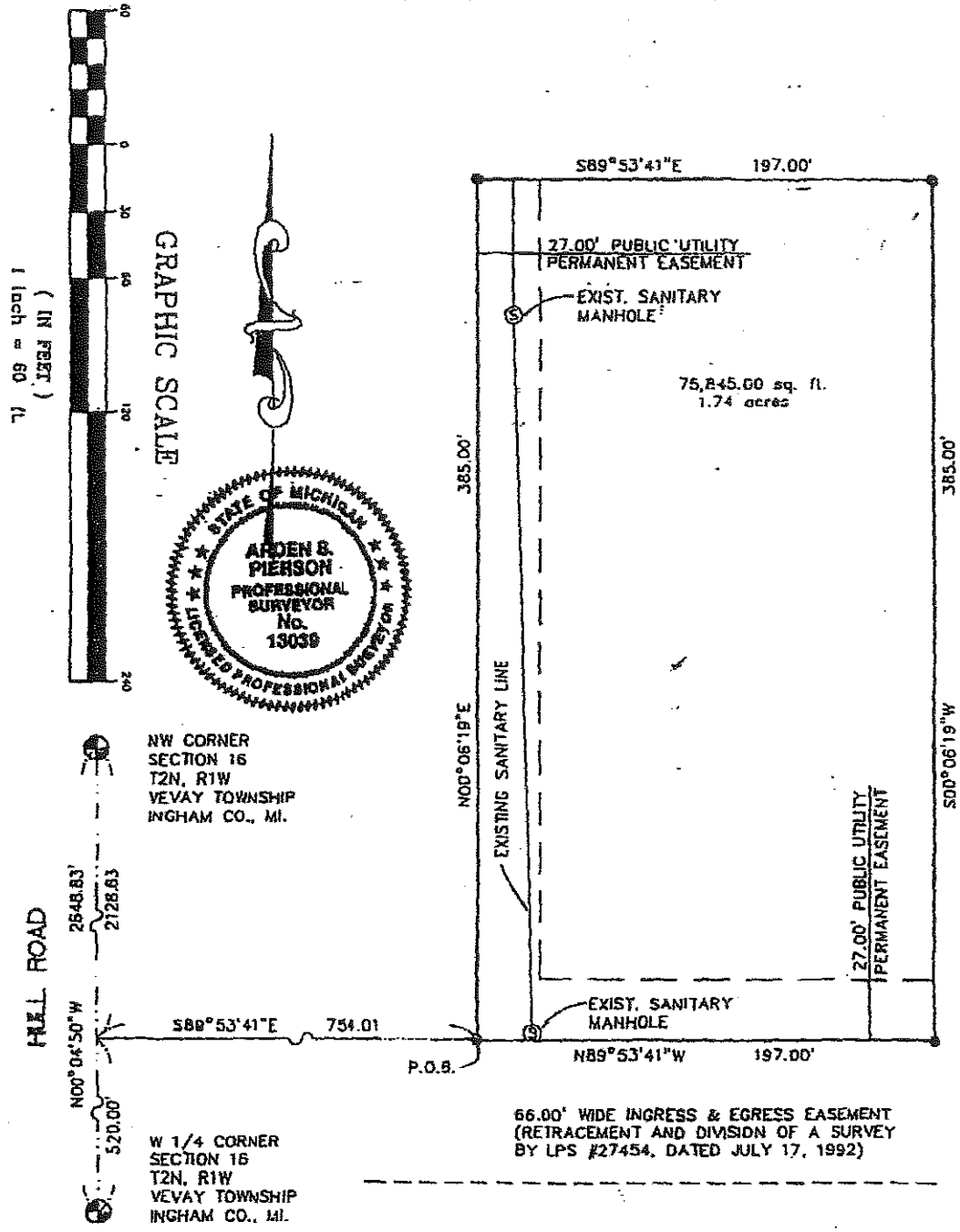
USA Lamp & Ballast Recycling, Inc
d.b.a. Cleanlites Recycling
MIR000016402
665 Hull Road, Mason, MI 48854

Figure 3

Plot Plan

CERTIFIED SURVEY

A Part of the Northwest 1/4 of Section 16, T2N, R1W
Vevay Township, Ingham County, Michigan



The undersigned hereby certifies that this map correctly represents a survey made under his supervision on the land above platted and/or described on 6/11/1996 and that the ratio of closure on the unadjusted field observations of such survey was 1/ 5000 and that all of the requirements of P.A.132 of 1970 as amended, have been complied with.

Arden S. Pierson
PROFESSIONAL SURVEYOR – MICHIGAN No. 13039

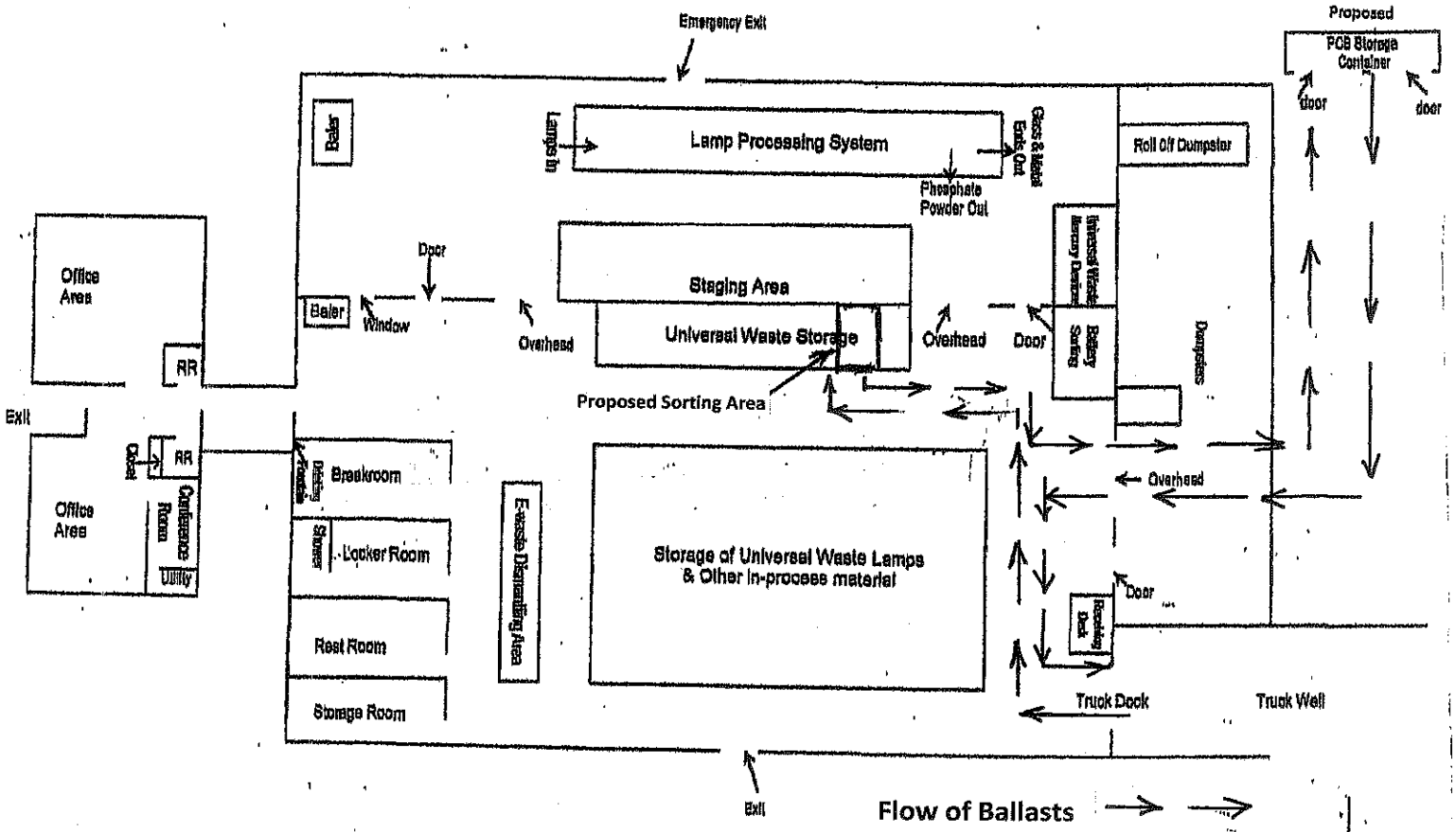
LEGEND.
- ● S.I.P. INDICATES SET IRON PIPE
- O F.I.P. INDICATES FOUND IRON PIPE
- (m) MEASURED DISTANCE
- (r) RECORDED DISTANCE

CLIENT: T. A. FORSBERG	
edi engineering design inc. 100 South Ottawa St. St. Johns, Mich. 48879 Tele. 517-224-2355	
PROJECT No. 9645R	SCALE: 1" = 60
DATE: 6/11/1996	SHEET 1 OF 2

Figure 3 Plot Plan

Figure 4

Facility Diagram



USA LAMP & BALLAST RECYCLING, INC
d.b.a. CLEANLITES RECYCLING
665 Hull Road, Mason, MI 48854
517.676.0044 phone / 517.676.4449 fax

PLANT LAYOUT

Figure 4 Cleanlites Facility Diagram

APPENDIX A

CERTIFICATION STATEMENT OF THE NON-APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

APPENDIX A

Certification of the Applicability of the Substantial Harm Criteria

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes _____ No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes _____ No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife sensitive environments?
   Yes _____ No X

4. Does the facility have a storage capacity greater than or equal to 1 million gallons, and if so, is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
   Yes _____ No X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the past 5 years?
   Yes _____ No X

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Michael Kimmel
Signature

Michael Kimmel
Name (please type or print)

Senior Vice President
Title

4/11/16
Date

APPENDIX B

SIGNIFICANT SPILL REPORT

Company Name

Date

Location of Loss (Be Specific)

Material Lost Amount

Date Loss was Discovered Time of Discovery

Weather Conditions

Injuries

Cause of Loss (include type of Equipment and Other Details)

Nature of Loss (include Complete Description of Damage)

Additional Comments (include Method of Control, Plans for Prevention of Recurrence, etc.)

Name of State Department of Environmental Quality Representative Contacted

1. Local Emergency Response Time
2. National Response Center Time
3. State Time

Telephone by Whom

Company Name By (Signature)

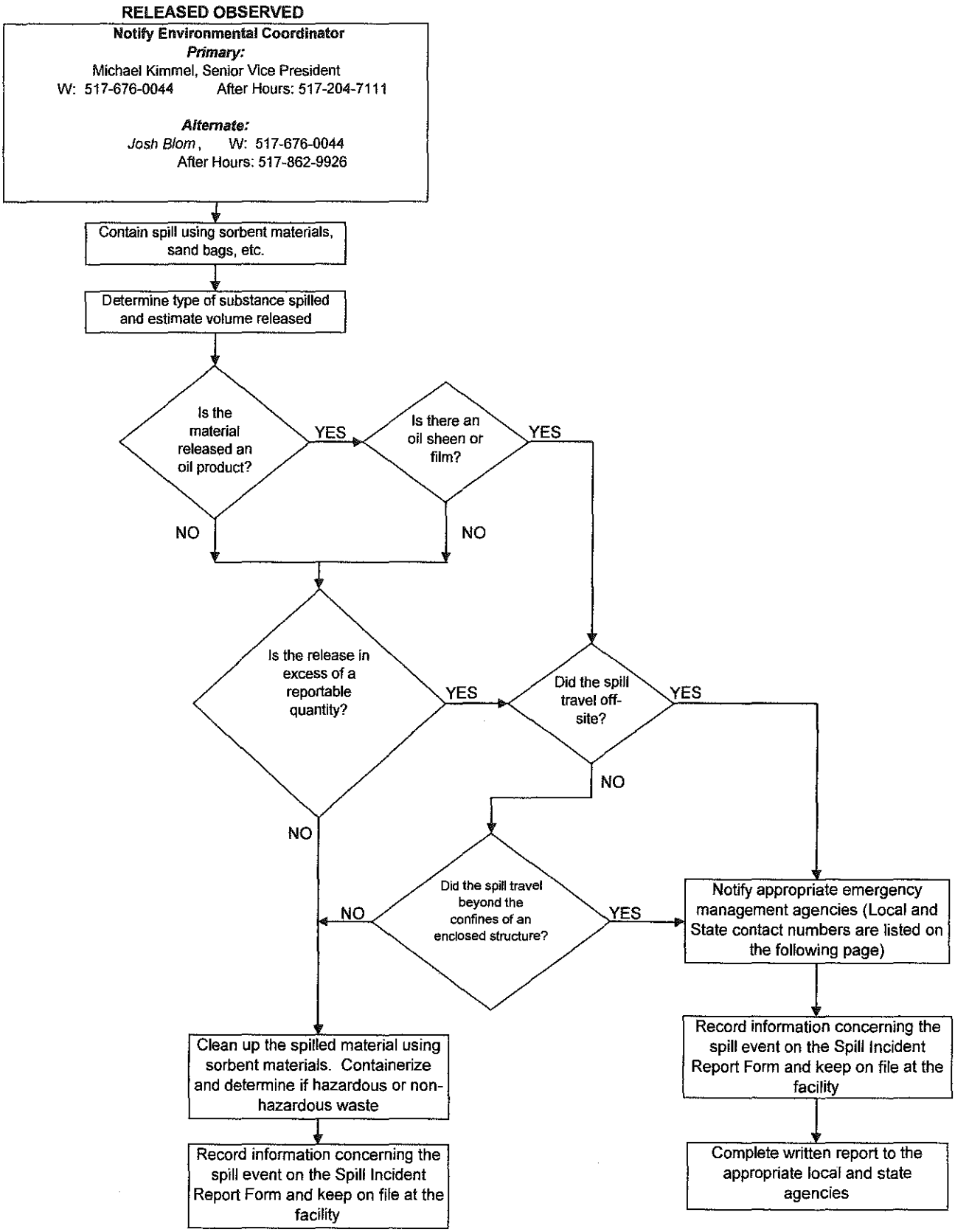
LOG OF SIGNIFICANT SPILLS AND LEAKS

Definitions: Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of reportable quantities.

DATE (mo/day/yr)	SPILL	LEAK	LOCATION	DESCRIPTION				RESPONSE PROCEDURE		PREVENTATIVE MEASURES TAKEN
				TYPE OF MATERIAL	QUANTITY (gal)	SOURCE (if known)	REASON	AMOUNT OF MATERIAL RECOVERED	MATERIAL CONTAINED WITHIN A STRUCTURE (true/false)	

APPENDIX C

ENVIRONMENTAL ALERT FLOW CHART
AND
EMERGENCY CONTACT PHONE NUMBERS



RELEASE REPORTING CONTACT LIST

FACILITY CONTACTS

TITLE	NAME	PHONE
Primary Contact	Michael Kimmel	517-676-0044 Cell – 517-204-7111
Alternate Contact	Josh Blom	517-676-0044 Cell – 517-862-9926
Alternate Contact		
Primary Coordinator		

LOCAL AGENCY CONTACTS

AGENCY	PHONE
MI DEQ Office	1-800-292-4706
Fire Department	911
Police Department	911
Emergency Medical Service	911
Ingham County Emergency Preparedness Office	517-676-8223

STATE AGENCY CONTACTS

AGENCY	PHONE
Michigan – 24 hour Response Number	1-800-292-4706

FEDERAL AGENCY CONTACTS

AGENCY	PHONE
National Response Center	1-800- 424-8802
U.S. Coast Guard	1-800-424-8802
EPA Region V Administrator	312-886-3000

SPILL CLEAN-UP CONTRACTOR CONTACTS

NAME	PHONE
J & J Contracting	651-379-2791

APPENDIX D

EMPLOYEE TRAINING RECORDS

EMPLOYEE TRAINING

Date of Session: _____ **Time:** _____

Trainer: _____ _____

(printed) (signature)

Attendees (names, printed):	**Signature:**

Topics Covered: _____

Required: Highlights of any past spill events or failures; recently developed precautionary measures; applicable pollution control laws, rules, and regulations; general facility operations including operation and maintenance of equipment; contents of the facility SPCC Plan.

Other: _____

APPENDIX E

PREVENTATIVE MAINTENANCE AND INSPECTION REPORTS

PREVENTATIVE MAINTENANCE AND INSPECTION SHEET

(To be completed bi-monthly)

Date: _____ Time: _____

Inspected By: _____

Signature: _____

Inspection Procedures

1. Visually inspect storage areas for signs of leaks.
2. Inspect all containers, pumps, storage drums, foundations, supports and tanks for signs of leaks or deterioration.
3. Inspect closures and valves for signs of leaks.
4. Inspect all hoses and piping for signs of leaks.
5. Inspect mobile spill kits to ensure proper equipment is maintained.
6. Inspect all plant equipment containing oil or hazardous chemicals for signs of leaks.

Facility Equipment/Areas Containing Oil or Hazardous Chemicals		
Areas/Equipment Inspected	**Observations**	**Actions Taken**

Facility Equipment/Areas Containing Oil or Hazardous Chemicals		
Areas/Equipment Inspected	**Observations**	**Actions Taken**

APPENDIX F

UNLOADING/LOADING CHECKLIST

LAMP BALLASTS

UNLOADING/LOADING CHECKLIST
LAMP BALLASTS

CUSTOMER: _____

DRIVER: _____

DATE: _____

UNLOADING TIME - START: _____

STOP: _____

UNLOADING CHECKLIST:

- Chock trailer wheels
- Check trailer floor for evidence of leaks
- Visually inspect containers for signs of leaks or damage as they are unloaded
- Store containers in holding area near sorting area
- Ensure that count matches shipping papers
- Report any exceptions to the Plant Manager

LOADING CHECKLIST:

- Check drums for evidence of leaks or damage before removing from PCB Storage Building
- Carefully move drums from Storage Building to staging area
- Check drums for evidence of leaks, damage, and proper labeling
- Load drums onto truck carefully to avoid damage
- Ensure count matches shipping papers
- Report any exceptions to the Plant Manager

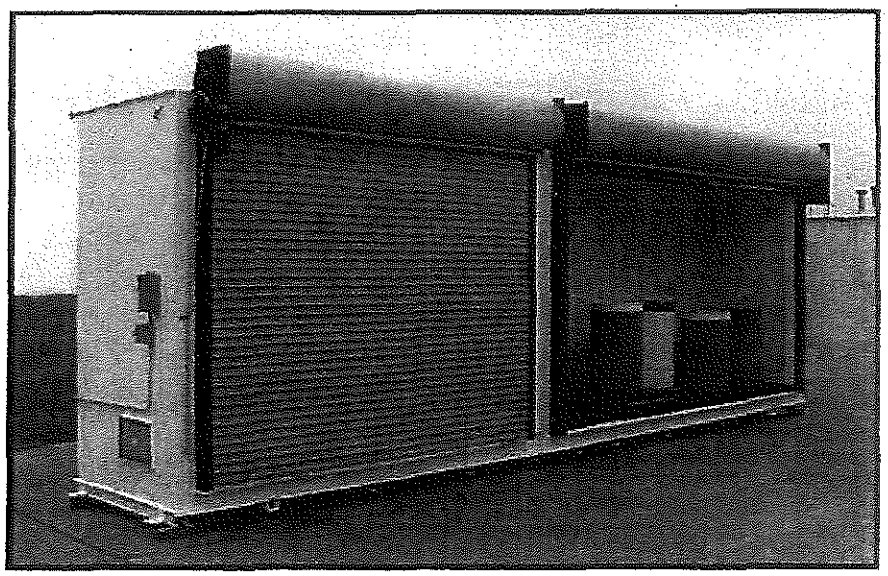
Attachment 1

PCB Storage Building

SAFETY STORAGE

P-Series Pallet Storage

Spill Containment Storage Racks



Roll-up doors can be operated manually or can be motorized with remote access.

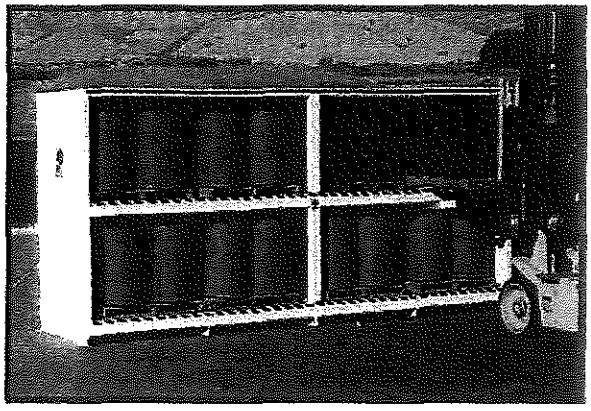
Simplify your storage! Store drums, containers and bulk materials on their pallets in a P-Series storage system.

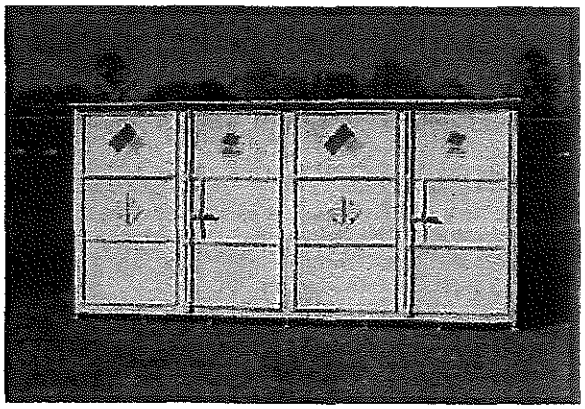
P-Series Cabinets from Safety Storage are the ideal solution for containment of palletized drums, IBC totes and other bulk materials. Outfit these cabinets for both storage and dispensing of hazardous, flammable, corrosive, or other controlled materials.

Store and inspect controlled materials inside the cabinet without entering the enclosure. Loading and extraction is easy via forklift or other material handling device

Optimize your storage space with a variety of door options: hinged, swinging, or roll-up doors. Models without doors are also available.

Select from a product line of models that store capacities from two (2) to thirty-six (36) loaded pallets. Other sizes and configurations are possible.

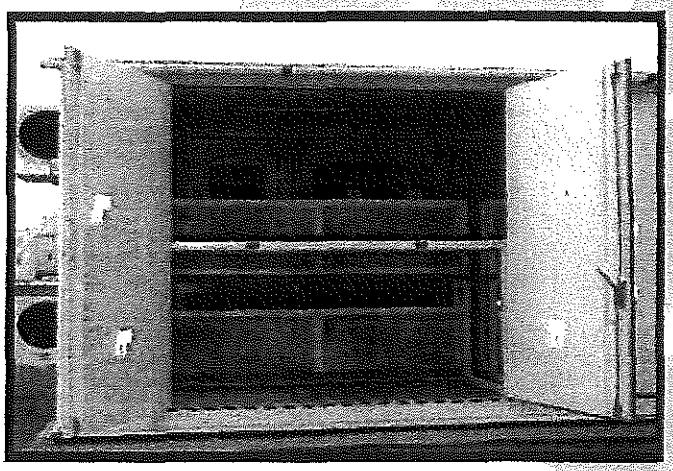




The P-Series system is designed for indoor secondary containment or outdoor weather-protected storage of hazardous chemicals and wastes. Ideally suited for complying with EPA's storm water regulations.

Standard Features

- *Accommodates from two to sixteen palletized 55-gallon drums per storage level*
- *Built-in cross supports are designed to hold multiple four drum pallets per level*
- *Spill containment sump located in lower and upper levels*
- *Constructed of heavy gauge steel for high strength and stability*
- *Interior and exterior structure protected by durable, chemical-resistant coatings*
- *Static grounding connection and grounding/bonding lugs*
- *Floor loading: 300 PSF capacity*
- *Hold-down plates for permanent anchoring*
- *Easy relocation with forklift or crane*



Optional Features

Lighting

Air vents/Ventilation

Horizontal drum racks

Explosion-relief panels

Sump drain or overflow pipe

Corrosion-resistant sump liners

Doors - hinged, sliding or roll-up

Upper tier secondary containment

Liquid level detector with alarm (explosion proof)

Fire suppression sprinklers (NFPA 231C) for each level

Removable fiberglass or galvanized steel floor

P-Series Storage Specifications

Model No. *	Capacity		Nominal Outside Dimensions	Sump Capacity (gal.)		Tare Weight
	(55 gal. drums)	(# of pallets)		Level 1	Level 2	(lbs.)
2P	8	2	10'3" x 5'6" x 5'3"	150	N/A	2,100
4P	16	4	10'3" x 5'6" x 9'7"	150	150	3,700
8P	32	8	19'8" x 5'6" x 9'7"	300	300	7,000
16P	64	16	19'8" x 10'3" x 9'7"	600	600	12,400

* *Please call for information on additional sizes.*

NOTE: When adding sliding doors, the outside length for the 8 & 16 increases to 10'5" and the 32 & 64 increases to 20".

Represented by:

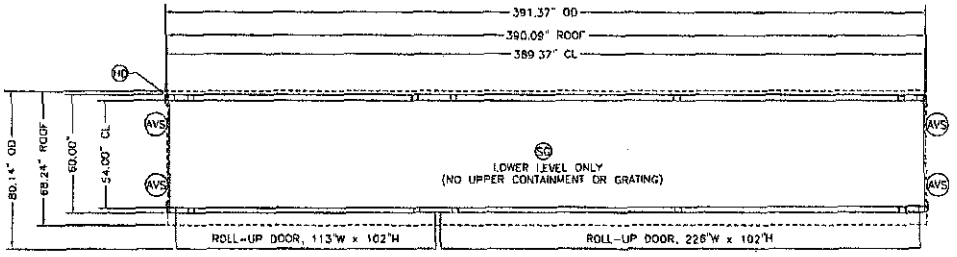
Safety Storage, Inc.
Toll Free: (888) 345-4470
Fax: (217) 345-4428
E-mail: info@safetystorage.com
Web: www.safetystorage.com

SAFETY STORAGE®

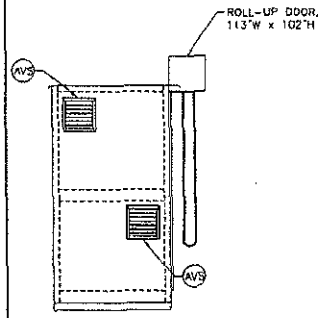
SAFETY STORAGE DRUM PALLET STORAGE UNIT – MODEL 12P

STANDARD FEATURES

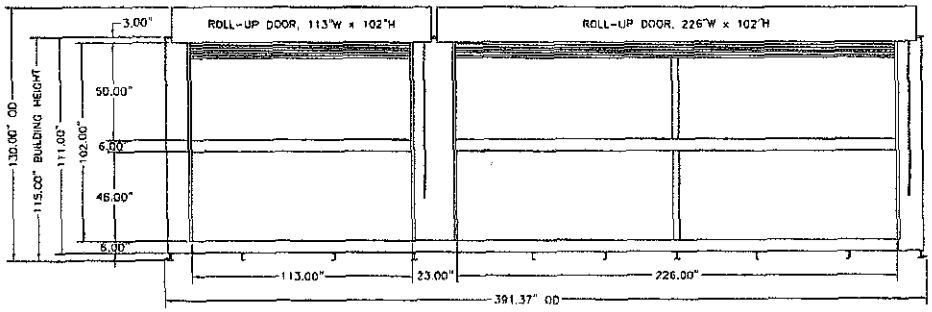
- Pallet Storage Capacity: 12 Pallets
- 55-Gallon Drum Storage Capacity: 48 Drums
- Nominal Ext. Dim. (LxWxH): 29'3" x 5'6" x 9'7"
- Number of Storage Openings: 6 *(3 Lower & 3 Upper)*
- Int. Dim. (LxWxH): 9'3" x 4'6" x 3'10" *(Each Lower Tier Opening)*
- Int. Dim. (LxWxH): 9'3" x 4'6" x 3'10" *(Each Upper Tier Opening)*
- Int. Dim. (LxWxH): 27'9" x 4'6" X 3'10" *(Lower Tier + Lower Tier + Lower Tier)*
- Int. Dim. (LxWxH): 27'9" x 4'6" X 3'10" *(Upper Tier + Upper Tier + Upper Tier)*
- Exterior Wall Construction: Noncombustible galvannealed steel sheets attached to corrosion-protected structural steel tubing for maximum durability and weather resistance
- Roof/Ceiling: Noncombustible continuously welded steel sheets attached to structural steel tubing. Corrosion-protected for maximum durability and weather resistance
- Sump Wall Construction: Noncombustible continuously welded sheet sheets for maximum spill containment protection
- Base of Unit: Open channel construction providing visual Inspection. Coated with a protective undercoating for maximum corrosion resistance
- Safety Chains *(when optional doors are not ordered)*
- Thirty-six (36) steel pallet loading supports (3 per pallet), corrosion-protected for maximum durability and weather resistance
- One (1) exterior static grounding connection
- Built-in 6-inch deep secondary containment sump with chemical-resistant coating
- Internal Spill Containment Capacity: 450 gallons *(Lower Tier)*
- Interior & Exterior Primer Coat: high solids chemical-resistant epoxy (white semigloss)
- Interior & Exterior Finish: high solids gloss-white aliphatic polyurethane
- Four (4) Hold-down Brackets
- Uniformly Distributed Load (Upper & Lower Tiers): 250 psf
- Tare Weight: 9,600 lbs.



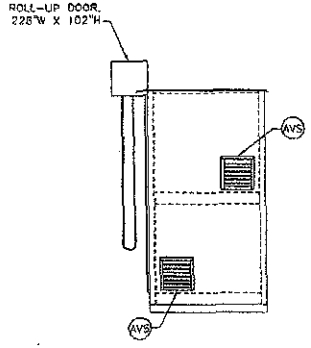
PLAN VIEW



LEFT END VIEW



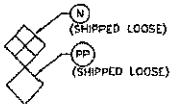
FRONT VIEW



RIGHT END VIEW

NOTES:

1. ONE (1) 113"W x 102"H ROLL-UP DOOR (CHAIN OPERATED)
2. ONE (1) 226"W x 102"H ROLL-UP DOOR (CHAIN OPERATED)
3. PAINT SPECIFICATION:
   - PRIMER COAT- EPOXY (EXTERIOR & INTERIOR)
   - FINISH COAT- POLYURETHANE (EXTERIOR & INTERIOR)
   - COLOR- STANDARD WHITE (EXTERIOR & INTERIOR)
4. TWO (2) NFPA 704M RATING SIGNS AND PERMANENT D.O.T. PLACARDS (SHIPPED LOOSE)



LEGEND

AVS:	AIR INLET VENT, STEEL BUILDING
GC:	GROUNDING CONNECTION
HD:	HOLD-DOWN BRACKET
N:	NFPA 704M RATING SIGN
PP:	PERMANENT D.O.T. PLACARD
SG:	STEEL FLOOR GRATING (GALVANIZED)

DRAWING NO. TR-11908A-1A_1

SAFETY STORAGE
3301 MEM DRIVE
HOUSTON, TX 77023
PHONE: (800)937-3555
FAX: (800)937-7405

MODEL 12-PC

UNLESS OTHERWISE SPECIFIED:
ALL DIMENSIONS ARE APPROXIMATIONS

SIGNATURE

NUMBER: TR-11908A-1A
CUSTOMER: CLEANLITES
DATE: 3/25/09 PREPARED BY: WMS
SALES #: _____ PAGE 1 OF 1

Attachment 2

Containment Pallet

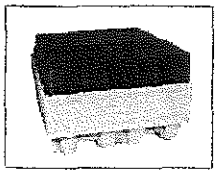
Call Today:
1-800-764-9563
1-904-292-9019

Products

Ultra-Spill Pallet P4 Nestable Model

Low-Profile, Nestable Spill Pallet Reduces Shipping Costs and Storage Space

- Large 66-gallon sump captures leaks and spills from steel or poly drums (4 drum capacity).
- Nestable design allows multiple spill pallets to be shipped (or stored) in a minimal amount of space.
- 100% polyethylene construction – compatible with a broad range of chemicals including acids and corrosives.
- Low-profile (10"height) makes drum handling safer and easier.
- 2-Way forkliftable – provides easy positioning and relocation.
- Meets SPCC, EPA Container Storage Regulation 40 CFR 264.175 and UFC Spill Containment Regulations.



ULTRA-SPILL PALLET P4 NESTABLE MODEL

Ultra-Spill Pallet P4® Nestable Model

Part# 1230: 4-Drum Spill Pallet, no drain
Part# 1231: 4-Drum Spill Pallet, with drain
Different part numbers are used for international orders – contact us for details.

Dimensions: 51" x 51" x 10" (1295 mm x 1295 mm x 254 mm)

Weight: 80 lbs. (36 kg)

Containment Capacity: 66 gallons (250 L)

Uniformly Distributed Load: 6,000 lbs. (2722 kg)

Option: Loading Ramp