

ELVS ROLE IN THE NVMSRP AND HOW THE MERCURY SWITCH COLLECTION PROGRAM WORKS



National Vehicle Mercury Switch Recovery Program (NVMSRP)

On August 11, 2006 the USEPA, auto industry, steel producers, scrap recyclers, state agencies, and the environmental community signed a shared responsibility agreement to collect and recycle mercury switches from end-of-life vehicles

On Feb 29, 2008, USEPA Administrator Johnson pulled the 1 Millionth switch of the program.



What Is The Difference Between ELVS And The NVMSRP?

- The NVMSRP is a voluntary multi-stakeholder, shared responsibility mercury switch collection program.
- ELVS is a signatory to the NVMSRP and has primary responsibility for education, collection materials, transportation, recycling, and record keeping.
- ECOS, ISRI, ARA, EPA, Steel, and NGOs make up the remainder of the NVMSRP partners and all have defined roles and responsibilities.

NVMSRP vs. Non-Voluntary States

- There are instances of legislative mandates for one or more of the signatories.
- For ELVS, the legislative requirements are often identical to ELVS' NVMSRP responsibilities.
- ELVS responsibilities for collection, education, recycling switches remain the same regardless of voluntary or mandated
- EPA considers all states (except Maine) to be part of the NVMSRP.
- Both the NVMSRP and Maine are EPA-approved programs for the area source regulation for Electric Arc Furnaces.
- All ELVS participants are considered to be part of the NVMSRP

How the NVMSRP Hg Collection Program Works

- Recycler contacts ELVS to join program.
- Sign up in several ways: Mail postcard, E-mail, or call ELVS toll free number (877/225-3587)
- Information Required: Site address, Mail address (if different), Contact person, Phone and E-mail (if available).

How The Hg Collection Program Works

- Choose Bucket size –large (3.5 gallon bucket) or small (1.25 gallon). Universal Waste shipping restrictions limits number of pellets/assemblies to 450 per bucket.
- Large volume recyclers who are returning assemblies should request a large bucket (which holds approx. 130-150 assemblies)
- Small volume recyclers or those only returning pellets should request small bucket. (which holds approx 30 assemblies/450 pellets)
 - ✓ About 1/3 of vehicles processed will contain an Hg switch. Processing 38 domestic autos a month is likely to fill a large bucket with assemblies in 1 year (130-150 assemblies per bucket).
 - ✓ Processing 112 domestic autos per month would yield the 450 pellet limit within a a year.

How The Hg Collection Program Works

- Once ELVS receives information, recycler is added to database and becomes enrolled.
- EQ ships box with collection bucket/educational materials
- Be sure to keep the cardboard box that bucket comes in! Bucket must be shipped back in the box.

How The Hg Collection Program Works

- Dismantlers collect switches and place in buckets
 1. Dismantlers have the option of sending in assemblies or removing the mercury switches/pellets/bullets –all the same thing—called by several names.
 2. Do not remove mercury switches from ABS module or glass switches from assemblies.
 3. Limit of 450 per bucket
 4. Program is for automotive mercury only –i.e. no thermostats, no thermometers, or liquid vials of mercury.
- Just before a bucket is completely full, dismantlers contact EQ to receive a replacement bucket.

How The Hg Collection Program Works

- Once a bucket is full, dismantler can contact UPS for a pickup –a prepaid UPS label is sent with every bucket.
- As long as bucket is packed according to the provided shipping instructions (not exceeding 450 switches, no free mercury, etc), the recycler is indemnified once UPS picks up the shipment.
- Filled buckets returned via UPS in box to EQ in Romulus, MI
- EQ will then manage the mercury through recycling/retorting. (Bethlehem, Mercury Waste Solutions-WI, Veoila-WI, AERC-PA)
- EQ database tracks participation and mercury collection progress

Examples Of Automotive Mercury Assemblies, ABS Modules, Switches

ABS Modules



Hood/Trunk Convenience Lights



Hg Pellet



Examples of Switches/Assemblies

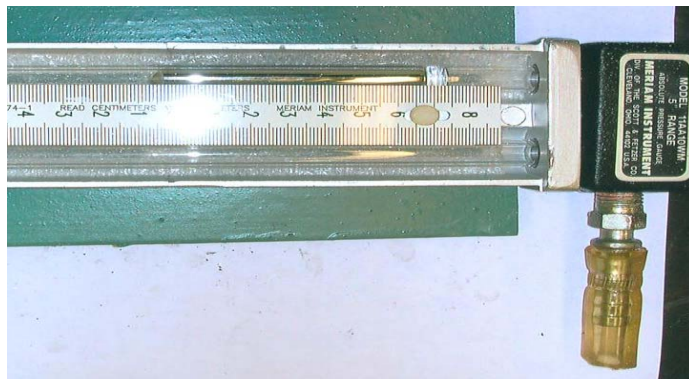
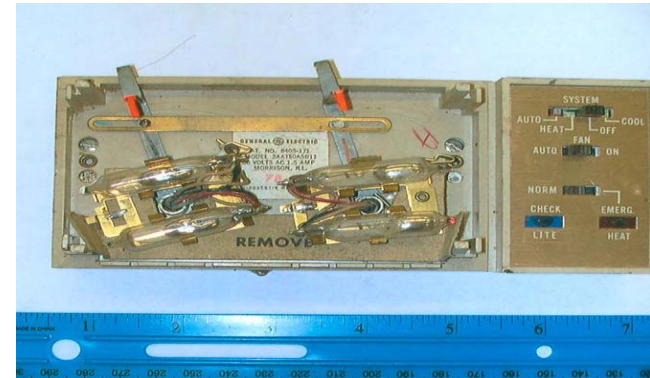
3.5 Gallon Bucket of Assemblies



Mercury switches after being removed from assemblies



Non- Automotive Mercury Thermostats, Appliance Controls, etc.



NVMSRP Incentive Fund

- \$4 Million early incentive of \$1 per switch for the first 3 years of program. Available to all states regardless of legislation unless have an existing cash incentive
- Dismantlers should put a “count” in buckets being returned for EQ to check their count against.
- Incentives considered income-requires W9 from dismantlers and 1099 reporting
- One time only requirement –first bucket of switches returned, 1099 form sent –when received back at ELVS, payment can be processed-usually within 60 days.

Verification of Participation

- Dismantler requests bucket and is entered into database.
- Database shows when initial bucket sent –used as program joined date
- Switches Returned: Yes or No
 - ✓Database will reflect
 - ✓Bucket detail can be viewed
- EAF/Steel use database information for verification of participation.
- Expectation is 12-14 months after receiving bucket, dismantlers would have returned initial bucket.



NATIONAL VEHICLE MERCURY SWITCH PROGRAM: PICK-N-PULL AUTO DISMANTLERS ROCKLIN #3

Pick-N-Pull Auto Dismantlers Rocklin #3

Mailing Address:
 10850 Gold Center Dr. Suite 325
 Rancho Cordova, CA 95670

Shipping Address:
 6355 Pacific St
 Rocklin, CA 95677

Phone: (916) 496-6768
 Contact: Chris Orsolini
 Parent Company: Pick-N-Pull Auto Dismantlers
 Switches Received?: Yes

Date Joined: 2/16/2007
 Last Activity: 11/28/2007
 Miscellaneous Switches Accepted: 0
 ABS Switches Accepted: 0
 Light Switches Accepted: 1,991
Total Switches Accepted: 1,991
 Weight of Mercury Accepted: 4.38 lbs

History

| Date Received | Miscellaneous Switches | ABS Switches | Light Switches | Total Switches | Weight of Mercury |
|---------------|------------------------|--------------|----------------|----------------|-------------------|
| 11/28/2007 | 0 | 0 | 653 | 653 | 1.437 lbs |
| 8/20/2007 | 0 | 0 | 471 | 471 | 1.036 lbs |
| 8/20/2007 | 0 | 0 | 867 | 867 | 1.907 lbs |

What Can You Do?

- Sign up for the program if have not already.
- Promptly return buckets so that database reflects accurate participation.
- Choose appropriate size bucket for volume of switches
 - ✓ Consider using small buckets in order to turn over buckets more quickly.
- Be sure not to exceed 1 year Universal Waste requirements

Contact Information

If you are not already in the program, please consider joining.

If you are in the program, please be sure to ship your buckets within one year from receipt of the bucket.

Be sure to visit the following Websites:

- <http://www.epa.gov/mercury>
- www.elvsolutions.org
- www.eqonline.com

ELVS Phone Number: 877/225.3587

EQ for Replacement Buckets: 734/547-2511