

Auto Switch Roundtable Notes
Mercury Reductions Conference
May 25, 2005

Maine Program

1. Mandatory program. Auto recyclers pay \$1/switch. Being raised to \$3/switch.
2. Auto manufacturers provide free collection containers to auto recyclers and pay recycling costs. Auto recyclers have to take switches to consolidation facility.
3. Finding auto recyclers is difficult. Tend to go in and out of business frequently.
4. Bounty has been important incentive. Especially for yards that weren't complying with other environmental regulations.
5. Dedicated staff at state implementing agency very valuable for success and sustainability of program.
6. 3,000 switches turned in during the past 2 years. Dismantlers can store switches on site for up to 3 years as universal waste. Therefore, measurement data are not complete.
7. Estimate that approximately 15,000 switches are still sitting in buckets at yards. Yards are too busy to turn in switches or are waiting for bounty to increase.
8. Data sources used to find ME auto recyclers
 - a. NPDES permits
 - b. Dunn & Bradstreet database
 - c. State and local licensing programs used to track vehicles and part
 - d. State lists of registered businesses (usually kept by secretaries of state)
 - e. Aerial photographs
 - f. Industry/Trade associations
9. Education
 - a. Fact sheets
 - b. 15 minute video (got more attention than written materials)
 - i. Work with trade association and local recycler to develop
 - c. Follow up with workshops and site visits
 - i. Work with trade association to host
 - ii. Provide food and they will come
 - d. Continuous outreach, especially with smaller facilities
 - e. Laminated posters (for auto recyclers to hang on shop walls)
 - f. Make information available free of charge (mailings, web)

Michigan Program

1. Conducted a pilot voluntary program with the Auto Recyclers of Michigan had 23% participation rate
2. The Alliance of Automobile Manufacturers (AAM) and environmental groups wanted to work with the MI DEQ to develop non-regulatory program.
 - a. An MOU between the MI DEQ and the AAM signed. Good for 2 years. Just now rolling out the program.
 - b. Voluntary removal of switches at end of life. Can turn in assembly or bullets.
 - c. Free collection containers.

- d. Auto recycler must take switches to one of 15 Clean Sweep sites in Michigan.
 - e. No bounty.
 - f. Collected switches can be kept at dismantler for up to 1 year as a Universal Waste.
 - g. Contacting salvage yards with stormwater permits asking them to join initiative.
 - h. Trade association hasn't signed on. Only 14 dismantlers of MI's approximately 750 dismantlers have signed on.
 - i. Trade association issues:
 - i. Potential liability
 - ii. No bounty
 - iii. No data on nexus between dismantling and stormwater impact
 - iv. Feel that they are being singled out (not going after service station, dealers, etc.)
3. Education
- a. Brochure
 - b. Developed Michigan specific video similar to Maine's
 - c. Mailings to all known auto recyclers in state.

Minnesota

- 1. Have had a dismantler removal law for over ten years.
- 2. Conducted outreach.
- 3. Due to limited compliance.
- 4. Participation increased after some high profile enforcement cases.
- 5. No bounty.
- 6. Free transportation and recycling.
- 7. Want dismantlers to turn in complete assemblies, not just switches cases.
- 8. North Star Steel mill pays dismantlers for switches they bring in. Pay \$40/pound.
- 9. About ¼ of dismantlers in state recycle switches through North Star steel.

Colorado

- 1. Voluntary program.
- 2. No bounty.
- 3. State pays for transportation and disposal or recycling of mercury. Funded by SEP with a steel mill.
- 4. Hosted workshop. Had auto recyclers demonstrate removal procedures.
- 5. Good attendance.
- 6. Conducted follow up visits. Saw good practices being implemented after workshops.
- 7. Incentives for auto recyclers to remove and recycle switches:
 - a. Compliance assistance and less frequent inspections by DEP
 - b. Stressed how a little bit of mercury contaminates a lot of water.
- 8. Plan more outreach to recyclers through stormwater program.
- 9. Success of program is determined by estimating number of dismantlers participating in training and estimating number of switches removed per yard.

Vermont

1. Voluntary program.
2. Bounty is state funded.
3. Limited participation.
4. Have talked to “better” auto recyclers in VT about participation. They won’t participate in program unless mandated.

New Hampshire

1. Voluntary program.
2. Trade association involved in program.
3. State is paying for switch transportation and recycling or disposal.
4. Trade association paid for collection containers.
5. Individual recyclers provided labor. No bounty paid to them.
6. Money is running out. State is worried about program sustainability.
7. Looking for innovative funding. SEPs for funding?
8. Switch removal program is part of a broader “Green Yards” program.

Anti-lock Braking System Sensors

1. ME requires bullets to be removed from ABS sensors. MI does not.
2. Only in Ford trucks and Jeeps
3. Clean Car Campaign estimated that 5% of US fleet has mercury-containing ABS.
4. Texas dismantlers want to re-sell ABS.

Miscellaneous Comments

1. Industry believes that mandating removal of switches is more important than offering a bounty.
2. Wisconsin’s experience is that there are different motivators for different people; some need enforcement to comply, some don’t.
3. Number of switches per vehicle depends on the state. Maine tends to have more older model vehicles still on the road than Michigan.
4. Vehicles crushing rate depends on scrap metal prices.
5. Auto recyclers tend to re-sell HID headlamps that are not broken.
6. Ward’s Automotive Report gives decommissioning rates by state. Annual report. Costs approximately \$3.00.
7. BMP manual for auto recyclers – Florida has one available on web (http://www.floridacenter.org/brochures_bulletins/automotive_recyclers_handbook.pdf)
8. Tom Tyler with USEPA can help keep all parties interested in this topic connected. As can ECOS.