



COMPLIANCE ADVISORY: Mercury Switch Removal From End-of-Life Vehicles Becomes Mandatory September 1, 2008

What is the mercury switch removal requirement?

Beginning September 1, 2008, all mercury-containing switches from scrap or "end-of-life" vehicles must be removed prior to delivery of the vehicle to a scrap metal recycling facility, unless the switch is inaccessible due to significant damage to the vehicle in the area surrounding the location of the switch. This switch removal requirement went into effect because not enough mercury switches were collected for recycling under a voluntary program that was created in 2007.

Who is affected?

The switch removal requirement applies to all vehicle recycling facilities that are in the business of acquiring, dismantling or destroying six (6) or more vehicles in a calendar year for the primary purpose of resale of the vehicle's parts. Scrap metal recyclers and vehicle crushers are also subject to the requirement if they accept scrap vehicles that have not been intentionally flattened, crushed or baled and the vehicle contains mercury switches.

Why collect mercury switches?

The purpose of removing mercury switches from scrap vehicles is to reduce mercury releases to the environment when vehicles are shredded and smelted to make steel products. Most of this mercury eventually will be released to the air unless these switches are removed before the vehicles are flattened or crushed. Once in the environment, mercury can be converted into more toxic methylmercury, which accumulates in the food chain.

Where are the switches located?

Vehicles manufactured prior to 2003 may contain mercury switches. The switches are found in the hood or trunk convenience light assemblies as well as vanity mirrors in some vehicles. They are also located in anti-lock brake G-force sensors (see pictures below).



Example of Ford light switch
Photo credit: Tom Corbett
NY Department of
Environmental Conservation



Example of GM light switch
Photo credit: Tom Corbett
NY Department of
Environmental Conservation



Example of anti-lock braking sensor from a 1999 Jeep Grand Cherokee. Photo credit: Jeff Gearhart

How can you comply?

The automotive industry has created a non-profit corporation, End-of-Life Vehicle Solutions (or “ELVS”) to help facilities remove and collect mercury switches for recycling. This program includes the following:

- Provides information on makes/models that contain mercury switches, the locations of the switches and how to remove them;
- Supplies containers to store the removed mercury switches and pays for the cost of transporting the switches to a waste or recycling facility,
- Pays a \$2 bounty for each mercury switch processed to help offset removal costs.

The mercury switches you remove from scrap vehicles must be recycled through this program. In order to receive the \$2 bounty, you will have to document the make, model, and year of each vehicle that contained a mercury switch. A documentation form, along with instructions on how to identify and remove mercury switches will be included in the recycling container provided by ELVS.

Bounties will not be paid for switches returned without the form, switches that cannot be directly linked to eligible vehicles, i.e. from vehicles which are known not to contain mercury switches, switches that do not contain mercury, or switches from automobile manufacturers who are not members of ELVS.

To enroll in the switch removal program, contact ELVS at (877) 225-3587, or visit www.elvsolutions.org/contact.html.

Do other state laws apply to the removal of the mercury switches?

After the mercury switches have been removed, the vehicle must be marked indicating that the switches were removed and the bullet or the switch assembly must be stored safely and managed under the state’s universal waste regulations. Switches may not be store for more than one year and the containers must be kept closed except when adding switches to the container. For a list of other universal waste requirements, go online at: <http://www.ipcb.state.il.us/documents/dsweb/Get/Document-12255>.

You will also be required to keep records of the number of mercury switches removed by make, model and year of vehicle, the number of vehicles received that contained mercury switches and the number of vehicles flattened, crushed, shredded or otherwise processed. These records must be maintained on site for at least three years. You must file an annual report on your switch removal activities with Illinois EPA by August 15 of each year. The annual report form is available online at <http://www.epa.state.il.us/mercury/auto-switch/annual-report.pdf>. We will also send you a copy by mail.

Whom should I contact with questions?

If you have any questions about complying with the mercury switch removal requirement, please contact Becky Jayne at Becky.Jayne@illinois.gov or (217) 524-9642. You can also obtain more information by visiting the Illinois EPA website at: <http://www.epa.state.il.us/mercury/auto-switch/index.html>