



Resolution Number 04-7
October 5, 2004
Oklahoma City, OK

As certified by
R. Steven Brown
Executive Director

NEED FOR NATIONWIDE MERCURY SWITCH REMOVAL STRATEGY THAT PROVIDES FLEXIBILITY TO THE STATES

WHEREAS a significant amount of the mercury that has been used in vehicle components is being emitted to the environment when end-of-life vehicles (i.e., cars, light duty trucks, and SUVs) are crushed, shredded and then melted to produce new steel.

WHEREAS the primary source of this mercury is the mercury-containing “convenience light switches” in the hoods and/or trunks, and the “anti-lock brake (ABS) switches,” used in some models of vehicles until Model Year 2003 when the auto manufacturers have voluntarily phased-out their use.

WHEREAS mercury emissions from steel manufacturing plants that process scrap steel from vehicles is the fourth largest source of mercury emissions in the U.S.

WHEREAS States, US EPA, regulated community, environmental groups, and others are working to develop a nationwide program to reduce mercury emissions from steel manufacturing facilities to the environment beginning January, 2005 by removing all reasonably accessible mercury switches from end-of-life vehicles and managing them in a manner that minimizes releases of mercury to the environment.

WHEREAS removing mercury switches from end-of-life vehicles achieves a more immediate and significant reduction in mercury; is a more cost effective option for controlling mercury emissions from steel manufacturing facilities than add-on pollution control devices; and results in greater mitigation of adverse impacts to human health and the environment.

WHEREAS States, U.S. EPA, regulated community, environmental groups, and others are working to reduce potential future mercury emissions that cause adverse human health and environmental impacts, and to maximize recycling of all end-of-life vehicle components.

NOW, THEREFORE, BE IT RESOLVED:

ECOS calls on the US EPA to promote a Mercury Switch Removal Program that includes the following elements:

Information Dissemination and Education to all dismantlers (and anyone else in possession of end-of-life vehicles prior to crushing, shredding, or melting).

Collection and Management system for collecting switches from dismantlers and transporting them to mercury retorters—without cost to dismantlers—and arrangements made with the retorters to accept and recycle them.

Switch-Removal Strategies with monetary and non-monetary incentives to ensure shared responsibility for the identification, removal, and proper management of all reasonably accessible mercury switches from end-of-life vehicles.

Measures of Success to ensure the effectiveness of programs in achieving the highest possible switch removal rates.

ECOS requests that EPA work with States and Tribes as partners, as well as industry, environmental, and other groups, to develop a mercury vehicle switch removal program that provides flexibility for States to maintain and to continue to develop, and implement their own switch removal strategies or programs.

ECOS supports EPA's plan to initiate a mercury switch removal program beginning in January 2005 and requests that EPA complete a review of the program within two years. If this review indicates that measures of success are not being met EPA should immediately pursue other approaches to effectively limit environmental releases of mercury attributable to vehicle switches.

ECOS requests that EPA work with the automobile industry, states, and other partners to implement design changes to expeditiously phase out all remaining uses of mercury in future vehicle production, to prevent future environmental impacts and maximize recycling of vehicles.

Copies of this resolution be transmitted to the Administrator of EPA, the Director of the Office of Management and Budget, the President of the United States, and the United States Congress.