

Department of Environmental Protection

Jeb Bush
Governor

Central District
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Orlando, Florida 32803-3767

Colleen Castille
Secretary

December 16, 2004

CERTIFIED MAIL

7003 2260 0005 6067 6745

Jim Kington
AERC Recycling Solutions
4317-J Fortune Place
West Melbourne, FL 32904

OCD-HW-C/E-04-443

Brevard County – HW
Pamphlet Revision

Dear Mr. Kington:

The Department has reviewed the pamphlet submitted by AERC Recycling Solutions (AERC) titled "Removing Mercury from Florida's Auto Salvage Yards". Enclosed with this letter is an example of the type of pamphlet the Department would like to see developed by AERC and several reference materials for AERC to use in developing the pamphlet. In addition to the comments written on the pamphlet, the Department has the following comments:

- Introduction: Please amend the introduction by including a short summary of mercury issues and reasons for removing mercury from the environment. Additionally, add a statistic of the importance of automobiles as a source of mercury contamination.
- Who needs to Remove Mercury Switches? Anyone who plans to dismantle, crush, shred, bale, or shear a vehicle. One of the best times to remove mercury containing switches and ABS modules is when an incoming vehicle is inspected. Remove the switches, ABS module, battery, and air conditioning refrigerant ("Freon") while incoming vehicles are inventoried and inspected for leaks prior to storage.
- Where are Mercury Switches Located? Many varieties of light assemblies use mercury switches. While the use of mercury switches is being phased out, assume that any American made automobile, model year 2003 and later, may have hood and trunk light switches, as well as ABS modules that contain mercury. A list is attached.... (we can work on how to include the list).

- How do I remove Mercury switches/ABS Modules? Current language needs to be more specific (also correct typos). Check the links below for detailed examples. We should be able to come up with something shorter – no photos but give a little more information.
- How do I Manage My Waste Mercury Switches? Currently, we are asking that the switches be managed as hazardous waste and stored in a 5-gallon container with a lid and labeled “Hazardous Waste, Mercury Switches”, because it can be managed as a satellite container, no accumulation date will be necessary until the bucket is ready for disposal. QUESTION: If the facility fills a 5-gallon bucket up with mercury switches, will it be too heavy to move? If so, should the buckets be filled only halfway? Also, add a sentence or two on safety – keep container indoors, out of traffic, closed, what to do if you have a spill, etc.
- How do I dispose of My Mercury Switches? Contact FDEP District office or AERC
- Links for more information.....

<http://www.epa.gov/region5/air/mercury/autoswitch.htm#remove>

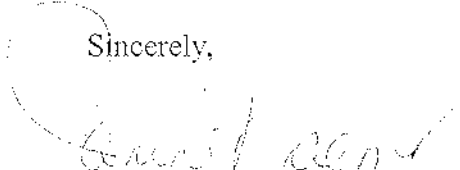
<http://www.dtsc.ca.gov/HazardousWaste/Mercury/>

http://www.dtsc.ca.gov/HazardousWaste/Mercury/HWMP_POL_Guidance_Mercury_Auto-dismantlers.pdf

The Department should have the completed salvage yard address list by the end of January. The Department would like to propose the pamphlets be mailed prior to mailing the hazardous waste containers; thereby, screening the address list. We can discuss the tracking method more before mailing. By tracking the returns, returned pamphlets will be used to eliminate facilities from the list, therefore, reducing the number of hazardous waste containers mailed.

The Department would like to review the revised pamphlet by the end of January 2005. If you have questions concerning this matter, please e-mail me at Janine.Kraemer@floridadep.net or call me at (407) 893-3323. Your response should be mailed to me at the letterhead address above.

Sincerely,


 Janine Kraemer, CHMM
 Environmental Specialist II
 Hazardous Waste Program