Mercury Switch Removal Best Management Practices

These best management practices (BMPs) are used to help vehicle dismantlers and anyone who crushes, bales, shears or shreds vehicles how to comply with the mercury switch regulations. They do not supersede any federal, state or local regulations.

BMPs for Removing Mercury Switches:

• All vehicles should be inspected for mercury switches before crushing, baling, shearing or shredding them.
• Mercury switches are either inside the hood or trunk light assemblies, or inside a plastic casing attached to the hood or trunk hinge.
• If you find a hood or trunk light and there is no mechanical switch, then it probably has a mercury switch.
• If you are not sure whether a hood or trunk light has a mercury switch, assume that it does and remove it anyway.

Here are some examples of when to remove mercury switches from the vehicles before they are crushed, baled, sheared or shredded:

- The impound yard where the vehicles are placed to await Department of Motor Vehicles (DMV) clearance.
- The vehicle cleaning area where trash, debris, batteries and brake fluid are removed from the vehicles.
- The drain racks where gasoline, motor oil and antifreeze are removed from the vehicles.
- The customer retail yard before the vehicles are sent to the scrap area where they are crushed, baled, sheared or shredded.

BMPs for Storing Mercury Switches:

A good place to store mercury switches is in a properly labeled container that has a tight-fitting lid, such as a plastic 5-gallon bucket, or a plastic-lined 55-gallon drum.
You should label the container ***"Universal Waste – Mercury Switches"***, as long as the switches are sent to a facility that reclaims the mercury. If the mercury is not reclaimed, the mercury switches have to be managed as a hazardous waste.
You can store more mercury switches inside the container if you remove them from inside the light assembly or casing. After you remove the mercury switch you can handle the casing or light assembly as regular waste.
You can store the mercury switches for up to 1 year after they are placed inside the container. You must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. A start date to mark the beginning of the 1-year period should be recorded to ensure that recovered switches are not stored for greater than 1 year as required by 40 CFR 273.

BMPs for Disposing Mercury Switches:

When you are ready to dispose the mercury switches for offsite recycling, you can either ship the mercury switches to another handler or transporter, or to a facility that recovers mercury. If the mercury switches are sent to an authorized disposal center rather than a recycling facility, the mercury switches have to be managed as a hazardous waste.

One good way to reduce disposal costs is by partnering with other businesses and establishing a collection point where the mercury switches are consolidated and picked up by a licensed waste hauler. This way several businesses can share the cost for the disposal of mercury switches.

BMPs for Recording and Tracking Mercury Switches and Vehicles:

Keeping all records, including shipping and receiving records, in a central file will make it easier to maintain and organize the records.

Keeping and maintaining a log in either a notebook or computer is a good way to comply with the recordkeeping requirements of the regulations. Here is an example of a log sheet:

Date
# of Vehicles
Dismantled
# of Vehicles to be
Dismantled that have
Mercury Switches
# of Mercury
Switches
Removed
# of Vehicles that have
Mercury Switches but too
Damaged to Remove
4-15-05 100 vehicles 25 vehicles 23 mercury
switches 2 vehicles
4-22-05 90 vehicles 10 vehicles 10 mercury
switches 0 vehicles

Marking the vehicles can help you keep track of which ones have been inspected and counted, and have mercury switches.

Facilities that send their vehicles offsite to be crushed, baled, sheared or shredded can also use a log for their records. Here is an example of a log sheet:

Date of
Shipment
# of Vehicles Shipped that have Mercury
Switches
Receiver's Contact
Information
4-15-05 20 vehicles
Jack Doe
Bob's Auto-wrecking
1234 Somewhere Street
Anytown, CA 98765
4-22-05 15 vehicles
Bob's Auto-wrecking
1234 Somewhere Street
Anytown, CA 98765

BMPs for Recording and Tracking Mercury Switches that are Shipped and Received:

The log sheet shown below is an example of how records of mercury switches that are shipped and received can be kept:

Date Mercury Switches Sent/Received	Quantity of Mercury Switches Shipped/Received	Sender's Contact Information	Receiver's Contact Information
4-15-05	1 pound of mercury switches	John Doe John's Auto Salvage 5555 Something Rd Anytown, CA 98765	*Jack Doe* *Bob's Auto-wrecking* *1234 Somewhere Street* Anytown, CA 98765
4-22-05	0.5 pound of mercury switches	John Doe John's Auto Salvage 5555 Something Rd *Anytown, CA 98765*	*Jack Doe* *Bob's Auto-wrecking* *1234 Somewhere Street* Anytown, CA 98765

Safe Practices for Handling Mercury Switches

Make sure that employees removing mercury switches are familiar with proper waste mercury handling and emergency procedures, and that a mercury spill cleanup system is readily available.

Here are some ideas that can be part of a mercury spill cleanup system:

- Have an emergency plan in place that provides proper response procedures and emergency contact information for accidental mercury spills and releases.
- Keep a mercury spill kit in an easily accessible area.

Here are some suggestions for safely handling mercury switches:

- Use personal protective equipment like gloves and safety glasses when removing mercury switches.

- Remove and handle mercury switches in areas where accidental spills can easily be contained and properly cleaned.
- Store mercury switch containers in designated and securable areas away from heavy traffic.