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December 30, 2019

Ms. Theresa Stiner
Planning, Permitting, and Engineering Section
Iowa Department of Natural Resources
Wallace Building, 502 East 9th Street
Des Moines, Iowa 50219-0034

Subject: End of Life Vehicle Solutions Corporation Annual Manufacturers' Implementation Report

Dear Ms. Stiner,

Iowa Administrative Code 567-Chapter 215, "Mercury-Added Switch Recovery from End-of-Life Vehicles", requires vehicle manufacturers to annually report:

- (1) the number of mercury-added switches collected
- (2) an estimate of the amount of mercury contained in the collected switches
- (3) the capture rate
- (4) the estimated number of vehicles manufactured containing mercury added switches; and
- (5) the estimated number of vehicles that have been processed for recycling

This report is provided by End of Life Vehicle Solutions Corporation on behalf of its member automotive companies. The participating members of ELVS are: FCA US LLC (formerly Chrysler Group LLC); Ford Motor Company; Mack Trucks Inc; Mercedes-Benz USA, LLC; Mitsubishi Motors North America, Inc; Navistar, Inc.; Nissan North America, Inc; PACCAR, Inc; Porsche Cars North America Inc.; Subaru of America, Inc; Toyota Motor Sales USA, Inc.; Volkswagen Group of America, Inc; Volvo Cars of North America; and Volvo Trucks North America. This report also includes switches from the former MLC (old GM).

Mercury Switch Collections

For the period December 16, 2018 through December 15, 2019, a total of 5,598 mercury switches were delivered to the ELVS recycling contractor from Iowa dismantlers, yielding 12.3 pounds of recovered mercury. There are 378 registered dismantlers in Iowa, 37 of which submitted switches during this period.

The estimated number of switches available for recovery in Iowa during 2019 was 23,000, resulting in a capture rate during the reporting period of 24.3%. The previous reporting year's capture rate was 31.3%.

ELVS uses the National Vehicle Mercury Switch Recovery Program (NVMSRP) Switch Retirement Model (www.elvsolutions.org/model.html) approved by the U.S. EPA and program partners to estimate mercury switch populations. The model was developed to identify switch populations and estimate mercury switch retirement rates through 2021. Therefore, the model focuses on mercury switch counts rather than vehicle counts. The model reports that the estimated national total number of mercury switches historically manufactured in vehicles was 169,185,000. Most of the vehicles containing these switches have already been scrapped, with an estimated 1,227,000 switches remaining in today's national fleet for collection in year 2020. Iowa's portion of switches remaining for collection in 2020 is estimated at 20,000. The number of mercury switches that were available nationally for recovery in 2019 is estimated to be 1,418,000. In Iowa, 23,000 switches were available for recovery in 2019.

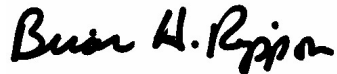
The information presented here is available through the ELVS website, www.elvsolutions.org with linkage to our contractor's website, <http://www.eqonline.com/services/ELVS-Mercury-Switch-Recovery-Program/annual-report.asp?year=all>. Information is updated daily as additional switches are delivered to our contractor, and is available for downloading into Excel for your convenience. This web-based data tracking system is part of ELVS' commitment to data accessibility, and will be available through 2021.

National Program Extension

As previously reported, based on a mutual desire to maintain nationwide recovery of automotive mercury switches, auto and steel manufacturers signed an agreement to continue the ELVS program beyond the original expiration of the National Vehicle Mercury Switch Recovery Program (December 31, 2017). The ELVS program has been extended through December 31, 2021. The services and program support currently provided by ELVS will continue unchanged during the extension of the program.

If you have any questions or comments regarding this report, please contact me at brelvs@yahoo.com or 248-477-7357.

Sincerely,

A handwritten signature in black ink that reads "Brian H. Rippon". The signature is written in a cursive, slightly slanted style.

Brian Rippon
End of Life Vehicle Solutions
Project Manager