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December 29, 2015

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, 2014 through December 15, 2015, a total of 12,212 mercury switches were delivered to the ELVS recycling contractor from Iowa dismantlers, yielding 26.87 pounds of recovered mercury. There are 374 registered dismantlers in Iowa, 76 of which submitted switches during this period.

The estimated number of switches available for recovery in Iowa during 2015 was 39,000, resulting in a capture rate during the reporting period of 31.3%. The previous reporting year's capture rate was 27.6%.

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 2017. 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 3,957,000 switches remaining in today's national fleet for collection (years 2016 - 2017). Iowa's portion of switches remaining for collection (2016 - 2017) is estimated at 66,000. The number of mercury switches that were available nationally for recovery in 2015 is estimated to be 2,356,000. In Iowa, 39,000 switches were available for recovery in 2015, while 35,000 switches are expected to be available in 2016.

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 until 2017.

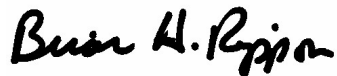
Program Improvement Actions

ELVS and NVMSRP regularly assess the overall progress of mercury switch recovery programs in order to identify what additional actions may be needed to encourage further recycler participation and to improve switch capture rates. In June 2015, ELVS participated in the Iowa Auto Recyclers "Summer Outing 2015", held in Des Moines, IA. We spoke with many Iowa recyclers that were active in our program as well as some who were not (we encouraged them to join). Throughout the year, ELVS also participated in a number of other regional and national automotive recycling conventions, some of which were attended by Iowa recyclers. In 2016, ELVS will continue to attend these kinds of events, including the Iowa Auto Recyclers "Summer Outing 2016" in Mason City/Kensett, Iowa.

As noted in the previous Implementation Report, NVMSRP member organizations completed a comprehensive review of the overall progress of automotive mercury switch collection programs in the U.S., including which collection program features have proven to be most effective. Earlier this year, NVMSRP and USEPA reengaged in the effort and are continuing to examine the findings in order to identify possible additional steps to enhance switch collections. It should be noted that the availability of mercury switches in the recyclable vehicle pool has been greatly reduced over time and will continue to decline.

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

Sincerely,



Brian Rippon
End of Life Vehicle Solutions
Project Manager