

*Notification & Phase-Out:
Lessons Learned from 5 Years
of the IMERC Process*



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What is the Interstate Mercury Education & Reduction Clearinghouse (IMERC)?

- Provides ongoing technical & programmatic assistance to states that have enacted mercury reduction legislation
- A single point of contact for industry & the public for information on mercury-added products & member states' mercury education & reduction programs
- Current member states: CA, CT, IL, ME, MA, MN, NH, NJ, NY, NC, RI, WA, VT

Data on Mercury-added Products

- What is a mercury-added product?
- Manufacturers or distributors of all mercury-added products sold in CT, ME, MA (soon), NH, NY, RI, & VT must report on the product/s, the mercury content, and total mercury use in all products sold in the US
- IMERC provides a single clearinghouse for submitting, reviewing, & managing reports
- Full update of total mercury use data for US-wide sales every 3 years

Online Mercury-added Products Database

- Database contains information submitted by manufacturers to comply with state notification requirements on mercury content of products
- Available in an online searchable database
- Currently updating database with 2004 information

<http://www.newmoa.org/prevention/mercury/imerc/notification/>

Data Uses

- Basis for developing statutes & regulations -- target products for labeling, collection/recycling, phase-out
- Helps companies understand mercury use – supply chain
- Consumer Education
- Identify Trends -- Are certain types of mercury-added product uses increasing or decreasing?

Manufacturer Classification

Mercury-added product manufacturers
grouped as –

- Original Equipment Manufacturers (OEMs): components, devices, & dental amalgam
- Larger Product Manufacturers

2001 Data Summary

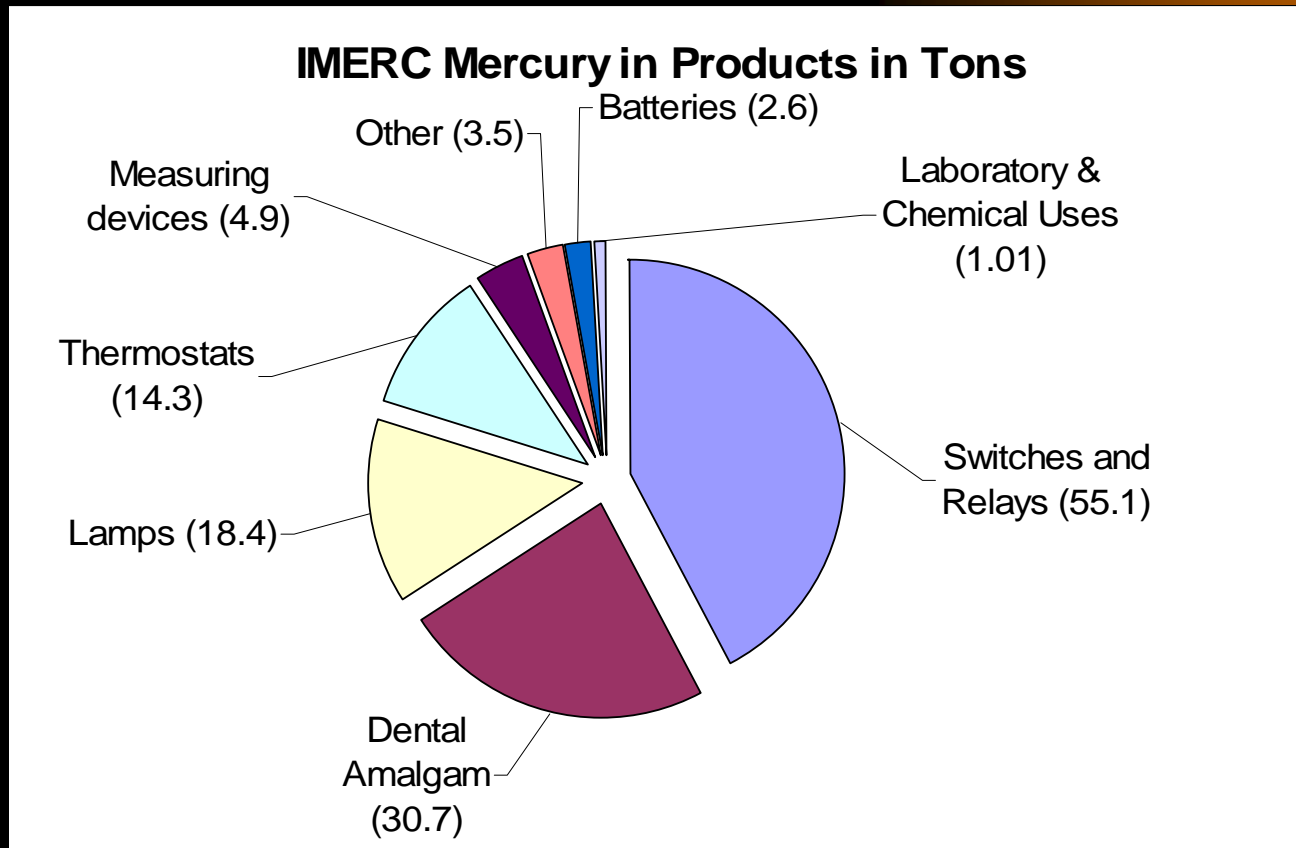
Mercury-added products data based on OEM information summarized in the following product categories:

- Switches & Relays
- Thermostats (type of switch)
- Measuring Devices (i.e., thermometers, barometers, flow meters, sphygmomanometers)
- Lamps
- Batteries
- Dental Amalgam
- Laboratory & Chemical Reagents
- Other

2001 Data Summary (continued)

- Summary data based on OEMs only to avoid double counting
- IMERC plans to analyze product specific trends after compiling & analyzing the data from two total reporting years (2001 & 2004) – still collecting & reviewing 2004 data

2001 Mercury Use in Products Picture



Data Caveats

- May not have full compliance with reporting
- States beginning to initiate wider enforcement
- However, overall picture of relative uses of mercury not likely to change

Limitations

- Product brand name may not be the same as the manufacturer name (i.e., Maytag Corporation has products that have the brand name of Maytag, Amana, Jenn-Air, or Jade)
- Model specific information generally not included in the product description because reporting is for product category
- Most mercury-added products now have a label so that they can be identified at end-of-life

Data Summary Fact Sheets by Product Category

Fact sheets for product categories:

- Cooking equipment
- Switches & relays
- Measuring devices
- Thermostats

<http://www.newmoa.org/prevention/mercury/imerc/FactSheets/>

Future Papers

- IMERC is finalizing a briefing paper on mercury use in all types of lamps – to be published shortly
- Plan to prepare fact sheets on mercury use in dental amalgam, batteries, and possibly chemicals
- Maine DEP report on mercury use in batteries

http://www.maine.gov/dep/rwm/mercury/button_battery_report.htm

IMERC States with Phase Out Provisions

- **California**
- **Connecticut**
- **Illinois**
- **Maine**
- **New York**
- **Rhode Island**
- **Vermont**
- **Washington**
- **Massachusetts (soon)**

General Phase-Out Exemption Criteria

- Federal or state health or safety requirement
- Collection program in place
- No technically feasible non-mercury alternative available at a reasonable cost
- Product is beneficial to the environment or protective of human health

Impact of Phase-Out - Assumptions

- Using IMERC 2001 data
- State Populations
 - California 35,000,000
 - Connecticut 3,500,000
 - Illinois 12,700,000
 - Maine 1,300,000
 - New York 19,200,000
 - Rhode Island 1,000,000
 - Vermont 600,000
 - Washington 6,100,000
 - **Total 79,400,000**

Impact of Phase-Out of Thermostats

- 14.3 tons reported nationally in 2001
- ~7,740 pounds/year potentially removed from IMERC phase-out states
- ~341 pounds/year removed from Connecticut

Impact of Phase-Out of Float Switches

- 6.6 tons reported nationally in 2001
- ~3,591 pounds/year potentially removed from IMERC phase-out states
- ~158 pounds/year removed from Connecticut

Impact of Phase-Out of Sphygmomanometers

- 2.2 tons reported nationally in 2001
- ~1,162 pounds/year potentially removed from IMERC phase out states
- ~51 pounds/year removed from Connecticut

Impact of Phase-Out of Flame Sensors



- 1,024 pounds reported nationally in 2001
- ~276 pounds/year potentially removed from IMERC states
- ~12 pounds/year removed from Connecticut

Mercury in Products, Examples Subject to Phase-Out (2001)

Product	IMERC states	Connecticut
Flame sensors	276 pounds	12 pounds
Sphygmomanometers	1,162 pounds	51 pounds
Float switches	3,591 pounds	158 pounds
Thermostats	7,740 pounds	341 pounds
TOTAL	12,769 pounds	562.9 pounds

Compliance with Phase-Out

- 103 letters sent by CT DEP to manufacturers subject to phase-out in 2005
- 42 did not respond (doing follow-up)
- 18 applied for an exemption or indicated they would
 - 7 granted, 5 denied, 6 pending
- 25 indicated they no longer sell the product anywhere
- 16 indicated they no longer sell in Connecticut
- 1 sold the company, 1 selling product without mercury

Phase-Out of Non-Fever Thermometers

- ~ 840 ASTM standards reference a mercury-in-glass thermometer
- Organizations such as Petroleum Institute & National Institute of Standards & Technologies (NIST), & FDA rely on the ASTM standards
- ASTM is working towards incorporating non-mercury alternatives

For more information

www.newmoa.org/prevention/mercury/imerc.cfm

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