



# GERDAU AMERISTEEL<sup>TM</sup>

## **Gerdau Ameristeel Corporate Policy on Minimizing Mercury-Containing Vehicle Switches from Scrap Feed Stock**

Gerdau Ameristeel Corporation is committed to participating in the National Vehicle Mercury Switch Removal Program (“NVMSRP”) as the most effective means of reducing the number of mercury-containing switches in the vehicle scrap stream, and thereby minimizing potential emissions of mercury to the environment. As part of that commitment, Gerdau Ameristeel has contributed to the NVMSRP Implementation Fund and is requiring its facilities to adopt a program with the goal of minimizing the presence of mercury-containing switches in the scrap feedstock.

Until 2002, mercury was used by vehicle manufacturers in switches for automotive hood- and trunk-lighting, as well as anti-lock braking systems. When these vehicles reach the end of their useful life, over 95 percent are dismantled or otherwise recycled. Until the establishment of the NVMSRP, there was no national system to retrieve and collect the mercury-containing switches prior to the crushing or shredding of the vehicle. As such, it was possible for the mercury in these switches to be released to the environment during the recycling process, including when the vehicle scrap is melted to manufacture new steel products. Because it is impossible to identify and remove mercury-containing switches after a vehicle has been dismantled, shredded or crushed, Gerdau Ameristeel is committed to reducing its mercury emissions by taking steps to identify and remove these switches prior to processing scrap metal from vehicles for recycling.

All Gerdau Ameristeel facilities are required to participate in the NVMSRP. In doing so, Gerdau Ameristeel facilities must develop and implement a plan to promote mercury minimization in the scrap supply. That plan must include provisions to:

- (1) Provide all scrap suppliers with written notice of Gerdau Ameristeel’s participation in the NVMSRP and strongly encourage those suppliers also to participate and to encourage their suppliers to participate as well.
- (2) Amend purchasing specifications to require the removal of mercury-containing switches from all scrap derived from end-of-life vehicles;
- (3) Request documentation from all suppliers of vehicle scrap regarding their participation in the NVMSRP or implementation of similar mercury switch removal program;
- (4) Verify scrap supplier compliance with mercury switch removal requirements, including possible scrap supplier site visits, spot checks of scrap loads, and/or

requests for documentation as often as is deemed necessary to protect the integrity of the incoming scrap feedstock;

- (5) Request and strongly encourage direct scrap suppliers to communicate these requirements to each upstream supplier, dismantler, vehicle crusher, shredder, and scrap processing facility;
- (6) Maintain a list of suppliers and upstream processors that participate in the NVMSRP or otherwise have effective mercury switch management programs. Where there is uncertainty about a supplier's mercury switch removal program, purchasing agents should make specific inquiry into the program before completing a purchase; and
- (7) Ensure that appropriate personnel, including scrap purchasers and environmental staff, are adequately trained in the requirements of the mercury minimization plan.