

**INSTRUCTIONS**  
**IMERC Mercury-added Product Notification &  
Labeling Plan Annual Update Form for  
Automobile Manufacturers**

Updated November 2006

The “Mercury-added Product Notification and Labeling Plan Annual Update Form for Automobile Manufacturers” is for use by automobile manufacturers only and enables them to comply with the IMERC-member states’ requirements for Mercury-added Product Notification and annual Labeling Plan Updates. This is a Form that is designed to enable manufacturers of automobiles that contain mercury-added components, such as high intensity discharge lamps and entertainment and dashboard displays that contain fluorescent lamps, to provide an annual update for their Mercury-added Product Notification and their labeling plan on a single Form. The Form streamlines the frequency and number of reports that automobile manufacturers need to submit to comply with the IMERC-member states’ Notification and Labeling Plan requirements. Automobile manufacturers are urged to use this product-specific Form once a year to avoid filing multiple Forms in a single year and to comply with the states’ Notification and Labeling requirements all at once. The annual deadline for submitting the Mercury-added Product Notification and Labeling Plan Annual Update Form for Automobile Manufacturers is September 1 of every year.

The combined Product Notification and Labeling Plan Update Form is for updating existing labeling plans and is not to be used by new manufacturers of mercury-added automobiles. If you are a manufacturer of mercury-added automobiles and you have never filed a Certified Labeling Plan with the State of Vermont, do not use this Notification and Labeling Plan Update Form. Go to [www.mercvt.org](http://www.mercvt.org) and complete a Certified Labeling Plan as described and instructed. Once a car manufacturer has received an approval from VT DEC on their certified labeling plan, they can use the Mercury-added Product Notification Form and Labeling Plan Update Form for their future reporting.

Manufacturers of mercury-added products other than automobiles should not use this Form; there are other versions of the Mercury-added Product Notification Form that should be used. Manufacturers of vehicles other than automobiles, including recreational vehicles, boats, heavy duty trucks, and other non-private passenger vehicles, cannot use this Automobile Manufacturer Form; use the Mercury-added Product Notification Form Single Manufacturer version. Please go to <http://www.newmoa.org/prevention/mercury/imerc/notification.cfm> to obtain this Form.

**Please make sure to use the correct version of the Mercury-added Product Notification Form.**

Complete and return this Form to:

**Interstate Mercury Education and Reduction Clearinghouse  
c/o Northeast Waste Management Officials’ Association**

129 Portland Street, Suite 602,  
Boston, MA 02114-2014

Contact the Interstate Mercury Education and Reduction Clearinghouse (IMERC) at (617) 367-8558 with any questions about completing this Form. For further information on the IMERC member states' notification and product labeling requirements, please visit <http://www.newmoa.org/prevention/mercury/imerc/plnotification.cfm>

## **GENERAL INSTRUCTIONS**

### **Who Must Notify and Provide a Labeling Plan Update?**

A product Notification Form must be filed with IMERC or with each state requiring Notification before a mercury-added product is offered for sale or distribution in these states. The states that require Notification include Connecticut, Maine, Massachusetts, New Hampshire, New York, North Carolina (for automobiles only), Rhode Island, and Vermont. For the purpose of the states' requirements, a "mercury-added product" means a product, a commodity, a chemical, a product with one or more components, or a product that cannot function without the use of that component, that contains mercury or a mercury compound intentionally added to the product, commodity, chemical, or component in order to provide a specific characteristic, appearance, or quality, or to perform a specific function, or for any other reason. A fabricated mercury-added product is a combination of individual components, one or more of which has mercury added, that combine to make a single unit.

An automobile manufacturer must submit a Mercury-Added Product Notification Form and Labeling Plan Update if they manufacture an automobile for consumer, commercial, industrial, or government use that incorporates a component that contains intentionally-added mercury (e.g., high intensity discharge (HID) headlamps, an entertainment system with mercury-added lamps, a navigation display system with mercury-added lamps, back lit instrumentation with mercury-added lamps). For the purposes of this requirement, a manufacturer is any person, firm, association, partnership, corporation, governmental entity, organization, combination, or joint venture that produces (or imports/sells/distributes) a mercury-added product.

### **Automobile Labeling**

The IMERC member states, Connecticut, Maine, Massachusetts, New York, Rhode Island, and Vermont, require manufacturers of mercury-added automobiles to label their vehicles to indicate that they contain a mercury-added component and the location of this component. This requirement applies to automobiles propelled by internal combustion engines or electric motors.

The Vermont Department of Environmental Conservation (VT DEC) requires that labeling plans be submitted with the introduction of new products. Because automobile manufacturers frequently introduce new products and remove others from the market, the Agency has agreed that car manufacturers can submit a single annual Labeling Plan Update in conjunction with the Notification Form. Under a new Vermont law, labeling for motor vehicles is no longer an "alternative method" of labeling that has to be renewed every three years; labeling requirements

for motor vehicles have been specifically written into the new law. For more information on the new Vermont law, visit [www.mercvt.org](http://www.mercvt.org).

Requirements of for labeling automobiles state that:

- No labels are required on the individual mercury-added components within a motor vehicle;
- The label is to be placed on the driver side doorpost (unless otherwise approved by the Vermont Department of Environmental Conservation) of motor vehicles that contain mercury-added components;
- Label placement at a clearly visible location near the entry point on motor vehicles without suitable doorposts. This location will be subject to the approval of the Vermont Department of Environmental Conservation (VT DEC);
- The vehicle door post label should list the mercury-added components included in the vehicle (the mercury-containing devices will vary with vehicle type);
- The motor vehicle dealer is responsible for applying the door post label (only in the case of a trade of a new vehicle by a dealer with a dealer in another state);
- No label are required on used motor vehicles; and
- The label wording should be as follows, as appropriate depending on the vehicle's mercury-added components:

**This vehicle may include mercury-containing devices installed by the manufacturer:**

- **High Intensity Discharge Headlamps**
- **Navigation Display**
- **Back-lit Instruments**

**Remove Devices Before Vehicle Disposal  
Upon Removal of Devices:  
Please Reuse, Recycle, or Dispose as Hazardous Waste**

If a manufacturer cannot place the label on the vehicle driver side doorpost, they need to contact Karen Knaebel, VT DEC, (802) 241-3455.

### **Reporting Deadlines**

Because automobile manufacturers change, add, and remove their products on a frequent basis (sometimes several times per year), the car manufacturers and the **IMERC member states have agreed to a single annual update schedule. Mercury-added Product Notification and**

**Labeling Annual Update Forms for Automobile Manufacturers are due by September 1 of each calendar.** This **annual** update **does not** fulfill the requirements for the Triennial Total Mercury Reporting for the Notification requirements in IMERC states.

The IMERC states require companies that must comply with the Mercury-added Product Notification requirements to provide total mercury use for US sales of the mercury-added products, at least once every three years. **IMERC has developed a special Triennial Update Notification Form to enable the automobile manufacturers to provide their total mercury use information on a separate Form. Go to [www.newmoa.org/prevention/mercury/imerc/plnotification.cfm](http://www.newmoa.org/prevention/mercury/imerc/plnotification.cfm)** to find this Triennial Update Form for automobile manufacturers.

The following is the schedule for triennial reporting for **Total Mercury Use**, starting in calendar year 2007—

- Triennial Reporting Deadline for Calendar Year 2007 Sales of Mercury-added Products in the US: **April 1, 2008**
- Triennial Reporting Deadline for Calendar Year 2010 Sales of Mercury-added Products in the US: **April 1, 2011**
- Triennial Reporting Deadline for Calendar Year 2013 Sales of Mercury-added Products in the US: **April 1, 2014**

## **SPECIFIC INSTRUCTIONS FOR COMPLETING THE FORM**

Manufacturers of automobiles should only report on vehicles that contain mercury-added components on the Mercury-added Product Notification and Labeling Plan Annual Update Form for **Automobile Manufacturers**. They should not include vehicles that do not contain mercury-added components.

### **SECTION I. MANUFACTURER INFORMATION**

This Section requires information on the manufacturer of the mercury-added automobile products and their designated contact person who can respond to questions regarding the information submitted.

**Manufacturer's Name** – The full legal name of the manufacturer.

**Manufacturer's Mailing Address** – The mailing address of the manufacturer, including a street number and street name or P.O. Box number, city or town, state, and zip code.

**Manufacturer's Telephone Number** – A general telephone number for the manufacturer.

**Manufacturer's Web Address** – Manufacturer's Website address.

**Manufacturer's NAICS Code(s)** – The North American Industry Classification System (NAICS) code is a two to six digit number representing a manufacturing or industry

sector into which the firm's activities fall. The NAICS system has replaced the Standardized Industrial Classification (SIC) system. If the manufacturer has not identified the appropriate NAICS code(s) for their manufacturing activity, list the SIC code(s) and indicate that they are SIC and not NAICS codes. To identify the appropriate NAICS code, go to <http://www.census.gov/epcd/www/naics.html>

**Contact Person** – A person who can answer questions regarding the information submitted.

**Contact Person's Title** – Title of the contact person.

**Contact Person's Address** – Mailing address of the contact person, including a street number and street name or P.O. Box number, city or town, state, and zip code.

**Contact Person's Telephone Number** – Telephone number of the contact person.

**Contact Person's E-mail Address** – E-mail address of the contact person.

## **SECTION II. PRODUCT INFORMATION TABLE**

Each mercury-added product or product category must be listed separately in Section II, the Product Information Table. Additional copies of the table can be made and attached to Form as needed. Various fields in the Table are designed to enable the user to use a pick list to select standardized answers as described below.

This Section should cover mercury-added automobiles that were manufactured in sold in the calendar year in which the reporting is occurring. For example, in September 2006 the report on the Form should cover the makes and models of the manufacturers' vehicles for sale during the entire calendar year. In this case, the manufacturer may sell model year 2006 and model year 2007 vehicles in a single calendar year and both should be included on the Form.

This form should be utilized by auto manufacturers to identify new models that have been introduced since the previous reporting dates, do not include vehicles that have been discontinued since the previous model year on this Form. If a manufacturer finds that information submitted for a previous year is incorrect, please submit a letter to the IMERC address on the Form stating the correct information.

**Name of Company Submitting Information** – Provide the name of your company or organization.

**Column 1, Model Year** – Identify the model year of the automobile (i.e., MY 2006, MY 2007)

**Column 2, Vehicle Make** – Identify the vehicle make (i.e., Ford, GM, Volvo, Porsch, etc.)

**Column 3, Vehicle Model** – Categorize only models of the same make, same model year, and same mercury-added components (i.e., Ford Econoline, Ford Excursion, Ford Explorer MY 2006 with optional entertainment system screens).

**Column 4, Label Location** – Click on the field to use the pick list to select the location of the label. The options are B pillar driver door (B); back access door driver-side (D); or other (any other label location must be pre-approved by VT DEC)

**Column 5, Label Wording** – Fill in the names of the mercury-added devices in the automobile next to the bullets that are provided.

**Column 6, Label Size and Material** – Briefly describe the label size and material.

**Column 7, Font Size** – Provide the size of the Font on the label (must be a minimum of 10 point).

**Column 8 and 9, Mercury-added Component** – In column 8, when you select a component, the Form will take you to the yes or no response in column 9. Select yes to indicate that the vehicle does or may contain that component and select no if it does not.

**Column 10, Number of Components per Vehicle** – Indicate how many mercury-added components there are in each vehicle using the default values or changing them, if necessary.

**Column 11, Standard or Optional** – Use the pick list to report whether the mercury-added component (i.e., HID lamps, navigational display) is optional or standard in the vehicle.

**Column 12, Location of the Component** – Use the pick list to choose the location of the component.

**Column 13, Amount of Mercury per Component (unit = mg)** – Report on the amount of mercury in the each individual lamp in the vehicle component using each specified ranges or an exact amount. The specific ranges are:

- (a) Greater than 0 but less than or equal to 5 milligrams (mg);
- (b) Greater than 5 mg but less than or equal to 10 mg;
- (c) Greater than 10 mg but less than or equal to 50 mg;
- (d) Greater than 50 mg but less than or equal to 100 mg;
- (e) Greater than 100 mg but less than or equal to 1000 mg; or
- (f) Greater than 1000 mg.

There is a pick list available of the specified ranges.

**Column 14, How Amount of Mercury is Reported (R or E)** – Using the pick list indicate whether the information reported under Column 14 is an exact amount of mercury (E) or a range (R).

### **SECTION III. CERTIFICATION**

An authorized senior management official is required to sign and date the Notification and Labeling Plan Update Form to certify by the individual's signature that the information provided is true and correct to the best of the individual's knowledge and belief, subject to penalty for making unsworn false statements. An **Authorized Senior Management Official is defined as a** corporate officer or the individual responsible for the overall operation of a facility or operational unit of a facility, such as a plant manager, superintendent, manager of environmental programs, or person of equivalent responsibility.

**Signature** – Signature and date by an authorized senior management official.

**Printed Name and Title** – Legibly print the name and official title of the authorized senior management official signing the Notification Form and Labeling Plan Update Form.

**Confidential Business Information:** If your company has concerns about confidential business information (CBI), they should not submit the Notification and Labeling Plan Update Form to the Interstate Mercury Education and Reduction Clearinghouse (IMERC). For CBI consideration, submit the Form and a written request for CBI treatment directly to the following contacts at the state agencies:

Connecticut Department of Environmental Protection  
Office of Planning and Program Development  
79 Elm Street  
Hartford, CT 06106  
Contact: Thomas Metzner, CT DEP (860) 424-3242, [Tom.Metzner@po.state.ct.us](mailto:Tom.Metzner@po.state.ct.us)

Maine Department of Environmental Protection  
Bureau of Remediation and Waste Management  
17 State House Station  
Augusta, ME 04333-0017  
Contact: Enid Mitnik, ME DEP (207) 287-8556, [enid.mitnik@maine.gov](mailto:enid.mitnik@maine.gov)

Massachusetts Department of Environmental Protection  
One Winter Street  
Boston, MA 02108  
Contact: Lori Segall, MA DEP (617) 654-6595 or [lori.segall@state.ma.us](mailto:lori.segall@state.ma.us)

New Hampshire Department of Environmental Services  
Pollution Prevention Program  
6 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095  
Contacts: Stephanie D'Agostino, NH DES (603) 271-6398, [sdagostino@des.state.nh.us](mailto:sdagostino@des.state.nh.us); or  
Carolyn Russell, NH DES (603) 271-3010, [crussell@des.state.nh.us](mailto:crussell@des.state.nh.us)

New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-7250  
Contact: Peter Pettit, NYS DEC (518) 402-8705, [pmpettit@gw.dec.state.ny.us](mailto:pmpettit@gw.dec.state.ny.us)

Rhode Island Department of Environmental Management  
235 Promenade Street  
Providence, RI 02908  
Contacts: Ron Gagnon, RI DEM (401) 222-4700 (x7500), [ron.gagnon@dem.ri.gov](mailto:ron.gagnon@dem.ri.gov); or  
Beverly Migliore, RI DEM (401) 222-4700 (x7503), [beverly.migliore@dem.ri.gov](mailto:beverly.migliore@dem.ri.gov)

Vermont Department of Environmental Conservation  
103 South Main Street  
Waterbury, VT 05671  
Contact: Karen Knaebel, VT DEC (802) 241-3455, [Karen.Knaebel@state.vt.us](mailto:Karen.Knaebel@state.vt.us)