



March 1, 2012

VIA EMAIL

Ms. Janet Coit
Director
Rhode Island Department of Environmental Management
235 Promenade Street
Suite 425
Providence, RI 02908-5767

Ms. Beverly Migliore
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, RI 02908-5767

Subject: Thermostat Recycling Corporation's 2011 Annual Report

Dear Ms. Coit and Ms. Migliore:

Attached is TRC's annual collection report for calendar year 2011. TRC has made its best effort to provide a comprehensive report on its efforts to promote the collection program in Rhode Island and improve the program's environmental outcomes.

While results are encouraging, much work remains. Access to the program has increased significantly in the last year, however TRC needs significantly more HVAC contractors taking advantage of its free recycling program in order to meet and exceed our shared goal of keeping mercury out of solid waste.

TRC will continue to aggressively market its program in Rhode Island to encourage participation. We are working with HVAC wholesalers to increase the visibility of the program at their locations and will continue to push information about the program to HVAC contractors and homeowners in the state.

TRC is looking forward to future collaborative efforts with the Department. There is an appropriate and necessary role for state regulatory agencies in this effort and we see a number of areas where we can collaborate to enhance program outcomes.

Sincere Regards,

A handwritten signature in black ink, appearing to read "Mark Tibbetts", written over a white background.

Mark Tibbetts
Executive Director

Collection Data

Table 1: 2011 Rhode Island Collections by Brand

	Stats	Switches	Pounds Mercury
Honeywell	897	1081	6.702
White Rogers	66	76	0.471
GE	3	8	0.050
Bard	0	0	0.000
Burnham	2	2	0.012
Carrier	21	43	0.267
Chromalox	0	0	0.000
ClimateMaster	0	0	0.000
Crane	0	0	0.000
Empire Comfort	1	1	0.006
Goodman	1	2	0.012
WW Grainger	0	0	0.000
Hunter	0	0	0.000
Invensys	3	3	0.019
ITT	2	2	0.012
Lear Siegler	0	0	0.000
Lennox	20	31	0.192
Lux	2	2	0.012
Marley-Wylain	1	1	0.006
McQuay	0	0	0.000
Nordyne	7	7	0.043
PSG	3	7	0.043
Rheem	0	0	0.000
Sears	4	4	0.025
Taco	2	2	0.012
Thomas & Betts	0	0	0.000
TPI	0	0	0.000
Trane	5	9	0.056
Uponor	0	0	0.000
Valliant	1	1	0.006
York / JCI	16	22	0.136
NoMs	11	13	0.081
Loose Switches		348	2.158
Total	1068	1304	10.323

TRC recovered 10.323 pounds of mercury from 1068 intact mercury thermostats and 348 mercury switches from Rhode Island collection locations in 2011.

TRC recovered 682 thermostats from HVAC wholesale distributor collection locations, 386 from HVAC contractors. TRC recovered no thermostats from HHW locations in Rhode Island. No retailers have volunteered to participate in the program in Rhode Island.

Waste Mercury-Added Thermostat Management

Bins with waste mercury-switch thermostats are received at the fulfillment/processing center in Golden Valley, Minnesota. The facility is owned and operated by Honeywell International under contract with TRC.

Bins are received at the loading dock and sent to the TRC processing area. The bin and plastic liner are opened and the contents are identified, sorted, and tallied. The following data is recorded for each bin returned and processed: bin number, business name (location name), city, state, zip code, date returned, number of thermostats and mercury switches by manufacturer and any non-conforming material.

The bin is returned to the location that sent it in with a new pre-paid address label within 72 hours of receipt. The thermostats are stored and staged in a plastic lined carton in a storage area for final processing. The containers are dated and processed in order received, first in-first out.

The containers are returned from the storage area to the TRC processing area to have the mercury bulbs removed from the plastic housing. Universal Waste Regulations require the disposal of waste within 12 months of generation. TRC's processor requires that the disposal occur within 6 months of generation and TRC follows the more stringent requirement. Small quantities of thermostats are removed from the container,

which is then closed again, and placed at the bulb removal workstation on a tray that contains any potential mercury spillage. The bulbs are removed from the thermostats and placed into a 2 quart container at the work station. In the event that a bulb breaks and mercury spills, the work area is designed to contain the spillage and the operators are trained in the clean-up and disposal of mercury. TRC processing area is equipped with special mercury vacuum cleaners and the work area is vacuumed at the end of the work day to assure that any spillage is cleaned up and not left to evaporate.

The 2 quart container is emptied into a special 55 gallon drum which is labeled and dated according to regulations. The drum is sealed with a band and is only opened when contents are being added to it. Special negative pressure venting assures any fumes are drawn away and vented when the drum is opened.

The 55 gallon drum is then shipped to Bethlehem Apparatus Corporation in Hellertown, Pennsylvania for final processing of the mercury ampoules (switches). Bethlehem Apparatus meets or exceeds all local, state, federal and EPA regulations for the management of the product. Bethlehem's approvals for mercury recovery/recycling include:

- EPA - identification No. PAD002390961 (Bethlehem Apparatus Co., Inc.)
- EPA BDAT Requirement - satisfied by all recovery operations
- CERCLA (Comprehensive Environmental Response Compensation and Liability Act)
- Pennsylvania Department of Environmental Protection

The facilities' processing follows all EPA guidelines and regulations. TRC has a facility license from Hennepin County Minnesota for the operation of the TRC. Honeywell, Inc. has a Hazardous Waste Generator license from Hennepin County. All persons who handle mercury thermostats as part of the TRC operation receive training in the handling of Hazardous Waste and Universal Waste.

Program Education and Outreach

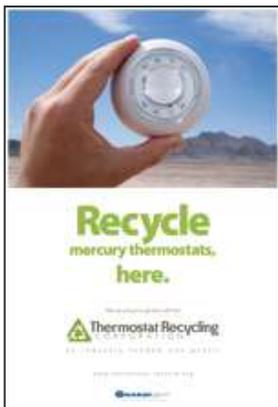
TRC marketing and promotion efforts targeted key audiences in Rhode Island. Our objectives are to raise awareness of key components of Rhode Island's mercury thermostat law and to encourage the recycling of waste mercury thermostats. Below is a summary of activities and channels we utilized in support of this effort.

Development of Written Materials and Signage for Collection Points and Key stakeholders—TRC developed and posted on its website (www.thermostat-recycle.org) a Promotional Toolkit which contains templates of a number of items for collection points to download and reproduce:

In 2011 TRC added three new items to the toolkit. The new items include two new posters and two versions of a point-of-sale card.

Exhibit 1: Examples of Toolkit Items

Poster



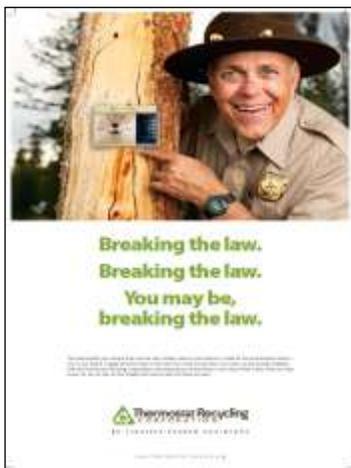
Advertisement



In addition to the templates on TRC’s website, TRC placed the new window cling (ideal for the entrances of collection locations) into inventory along with the two new 11 x 17 posters and a postcard. TRC provides the cling and a copy of the “law” poster to all new locations in Rhode Island and distributed both during site visits. TRC actively promotes the availability of these items and provides copies upon request to any participating collection location, HVAC contractor or local government agency. These items are also distributed at trade shows.

Exhibit 2: Examples of Print Collateral

Poster



Window Cling



Wholesaler Recruitment/Engagement—Under Rhode Island law manufacturers were required to avail collection containers to qualified HVAC contractors, HVAC wholesale distributors, thermostat retailers, and local governments that request containers starting January 1, 2011. With mandatory HVAC wholesale distributor collections commencing on February 1, 2011, TRC conducted a number of discrete activities to raise awareness of the law and TRC program.

In **December 2010** TRC sent correspondence (See Appendix A for a sample) to the branch managers of 50 HVAC wholesale distributor locations in Rhode Island. TRC developed the

marketing list using a variety of sources including industry trade groups, proprietary member lists, and commercial sources. To improve the response rate TRC mailed the letter in a 8½ x 11 envelope. TRC also placed a fluorescent colored label on each envelope with the notation “*Information regarding RI Mercury Reduction and Education Act*” Included with the letter was a TRC wholesaler participation form and the one-page fact sheet developed by the Department at TRC’s request.

Concurrent to the local branch mailing, TRC sent correspondence (See Appendix B for a sample) to a senior executive of 15 national or regional HVAC wholesale distributors with branch locations in Rhode Island. To improve the response rate TRC mailed the letter in a 8½ x 11 envelope. TRC also placed fluorescent colored label on each envelope with the notation “*Information regarding RI Mercury Reduction and Education Act.*” Included with the letter was a TRC wholesaler participation form and the one-page fact sheet developed by the Department at TRC’s request.

In **January 2011** TRC sent correspondence (See Appendix C) to its larger members which included the Department’s fact sheet on the program. TRC encouraged them to share this information with their Rhode Island customers.

TRC staff conducted site visits to wholesale collection points in **February 2011** and again in **August 2011**. Staff visited locations in February. Staff provided locations with promotional materials and if the location was not participating in the program staff provided them with information on Rhode Island law and the TRC program. Staff visited locations in August and again provided materials and compliance assistance.

TRC continued ongoing efforts to promote the program to HVAC wholesale distributors. For instance, in partnership with the Heating Airconditioning, Refrigeration Distributors International (HARDI) TRC launched the inaugural *Mercury Thermostat Recycling Awards* in **May 2011**. The awards were intended to incent participation in the program by recognizing the distributor(s) that recovered the most mercury thermostats and/or developed innovative strategies to promote the program at its location(s). The program was widely promoted by HARDI to its members and within the industry trade press. TRC also developed custom promotional materials for HARDI members and templates of those materials are available on TRC’s website. The awards were presented at HARDI’s annual meeting in **October 2011**.

Retailer Engagement—TRC sent correspondence in **February 2011** (See Appendix D) to representatives of large national retailers encouraging their participation in the program.

Summary of Additional Education and Outreach by Channel

TRC conducted a broad array of activities intended to raise awareness of Rhode Island’s mercury thermostat disposal ban, mandatory HVAC contractor recycling, and the ease of compliance through TRC’s collection program.

Website—TRC’s maintains www.thermostat-recycle.org. The website contains participation forms, the previously mentioned outreach toolkit, safety and shipping information, media releases, and reports. The website includes a location search utility that provides for an easy search by zip-code of locations that have ordered TRC collection containers. TRC also promotes

its national collection partners by scrolling their corporate logos on the homepage. In **September 2011** TRC completed a *search engine optimization* (SEO) of its website. The objective of the SEO was to increase website traffic by making TRC easier to find on the internet. For instance if a person searches on the term “mercury thermostat recycling” or “thermostat recycling” the first search result in Google is TRC’s website.

Earned Media— TRC generated considerable positive media attention in 2011. TRC made a concerted effort in 2011 to generate stories on the program. Most notable was the four page article in *The Air Conditioning, Heating, and Refrigeration News (The News)* which included a TRC provided table on mercury thermostat laws. *The News* is one of the leading industry publications.

Publication/Website	Month	Coverage	Readership/Reach
<i>Air Conditioning, Heating & Refrigeration News</i>	January	Article on thermostat recycling and TRC	111,000
<i>RSES Journal</i>	January	TRC & HARDI partnership	18,000
<i>HVACR Business</i>	April	Guest Column thermostat recycling	33,000
<i>Indoor Comfort News</i>	June		25,000
<i>Air Conditioning Today</i>	June	2010 TRC annual report	n/a
ACCA-Hot Air! Blog	July	TRC program	n/a
Wholesale Observations (HARDI)	July	TRC program	n/a
<i>Demolition Magazine</i>	July/August	Proper management of mercury	n/a
<i>Indoor Comfort News</i>	July	2010 TRC annual report	25,000
<i>1800recycling.com</i>	September	Recycling old thermostats	N/A
<i>Contracting Business</i>	October	Thermostat recycling awards	29,000
<i>Indoor Comfort News</i>	October	USACD thermostat recycling	n/a
<i>Supply House Times</i>	October	Thermostat recycling awards	12,800

The National Demolition Association (NDA) also ran a multi-page article authored by TRC’s executive director on the proper management of mercury containing products found in residential and commercial structures in the **June/July** issue of *Demolition Magazine*. Reprints of several of these articles may be found on TRC’s website at <http://www.thermostat-recycle.org/media/index>.

Web-based advertising— TRC developed new rotating banner advertisements for 2011 and ran them (Exhibit 3) on the websites contractingbusiness.com (160x600 skyscraper) and hvac-talk.com (300x250 medium rectangle) during the months of **April, May, September** and **October**. Together, the websites average 1.8 million pages views and 280,000 unique visitors per month. HVAC-Talk.com, an online discussion community, boasts 122,000 registered users.

TRC strategically placed ads to coincide with the spring and fall HVAC business cycles. While the ads were featured, 701,528 impressions were delivered and 522 clicks on the advertisements were recorded.

Exhibit 3: Web Banner Advertisement (300 x 250 version)



Social Media— TRC developed and deployed a Social Media strategy that leveraged the power of Google and the popularity of Facebook. This campaign, which ran from **mid-September** through early **December 2011**, geo-targeted contractors and consumers in states with mercury thermostat disposal bans, including Rhode Island, in an effort to create awareness and increase thermostat collections.

Ads and landing pages (See Exhibit 4) were developed with variable messages targeting both audiences. Advertisements appeared on Google search results pages after an individual searched terms related to TRC’s mission (E.g. thermostat replacement, contracting recycling regulations, mercury thermostat recycling, programmable thermostats, etc.). Similarly, the Facebook campaign targeted users over 18 who "like" industry-relevant topics or organizations (i.e. renovating, renovators, HVAC, HVAC Technicians, home repair, etc.)

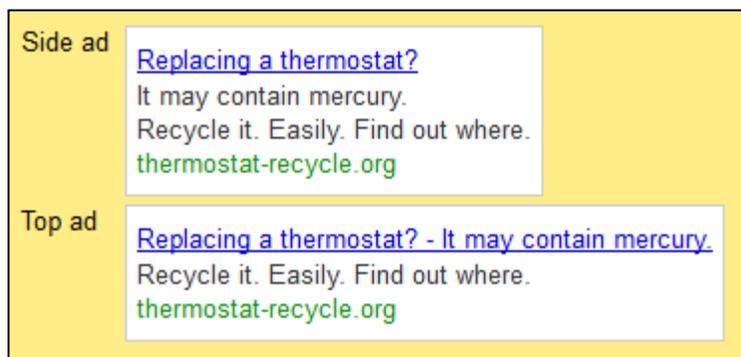
The campaign was very successful. The campaign resulted in over 340,000 impressions on Google and 8.1 million on Facebook.

Tip-In Insert in HVAC Trade Press—TRC placed an insert in the **April 2011** and **October 2011** issues of *HVACR Business* (see Exhibit 5). The insert was included in issues received by approximately 12,000 subscribers in states with mercury thermostat disposal bans (including Rhode Island). This enabled TRC to incorporate the message, “It’s something you gotta do, because it’s the law.” Additionally, TRC incorporated the logos of larger HVAC wholesale distributors on the backside of the card enabling contractors to quickly identify collection locations.

Tradeshows—TRC attended and exhibited at the following trade shows relevant to Rhode Island:

January 31-February 2: AHRExpo. Las Vegas. AHR Expo is the largest national trade show for the HVACR industry. TRC staff exhibited and promoted the program to HVAC contractors, manufacturers and distributors. The show had a total registered attendance of over 53,000. Specifically, 944 attendees were from New England.

Exhibit 4: Examples of Google and Facebook Advertisements



February 15–17: Air Conditioning Contractors of America Indoor Air Expo, San Antonio, Texas. Representatives from over 200 HVAC contracting businesses attended the show.

May 22-26: National Association of Oil and Energy Service Professionals. Hershey, PA. This was OESP's annual convention and trade show. Nearly 2,700 HVAC professionals attended this show, which targeted service managers for HVAC firms that install and repair oil fired furnaces (a high percentage of Rhode Island homes heat with oil).

September 27-29: North American Hazardous Materials Management Association (NAHMMA), Portland, Oregon. This was NAHMMA's annual meeting. TRC exhibited and co-presented with a HARDI representative.

October 23-26: Heating Airconditioning and Refrigeration Distributors International (HARDI). Maui, Hawaii. TRC exhibited and participated in the "Booth Program," which provides for 1-on-1 sessions with senior executive staff from HARDI member companies. This event targeted representatives of approximately 80% of the wholesale market for HVACR products. TRC also presented the inaugural Thermostat Recycling Award to three HVACR distributors recognizing their support of the program.

Direct Mail— TRC implemented a direct-mail campaign in Rhode Island in 2011. TRC mailed a postcard (see Exhibit 6) to approximately 500 Rhode Island based HVAC contractors in **March, September, and October**. TRC sourced the list of HVAC contractors from a

commercial list supplier. Additionally, TRC sent correspondence (See Appendix E) to the same list of 500 contractors in **October**. The letter informed Rhode Island contractors of the mandate to recycle, the availability of free recycling at all HVAC wholesale distributors, and for larger contractors, the opportunity to directly participate in the program.

Exhibit 5: Tip-in Insert HVACR Business



Public Service Announcement— TRC developed a new 30 second public service announcement in 2011. In **August 2011** TRC requested (See Appendix F) radio stations serving the Rhode Island market air the PSA. TRC also monitored the airtime of the PSA through **December 2011**. WDOM and WHJJ in Providence aired the PSA about five times during the fall reaching a combined audience of over 2,000 listeners.

Stakeholder Outreach— TRC sent correspondence (See Appendix G) to a number of HVAC and construction trade groups in Rhode Island. Letters were first sent in **March 2011** and again in **August 2011**. TRC staff followed up the letters with phone calls to staff at each organization (see Exhibit 7) encouraging them to use TRC provided copy in their member newsletters or in other communications.

Exhibit 6: Front & Back of Postcard

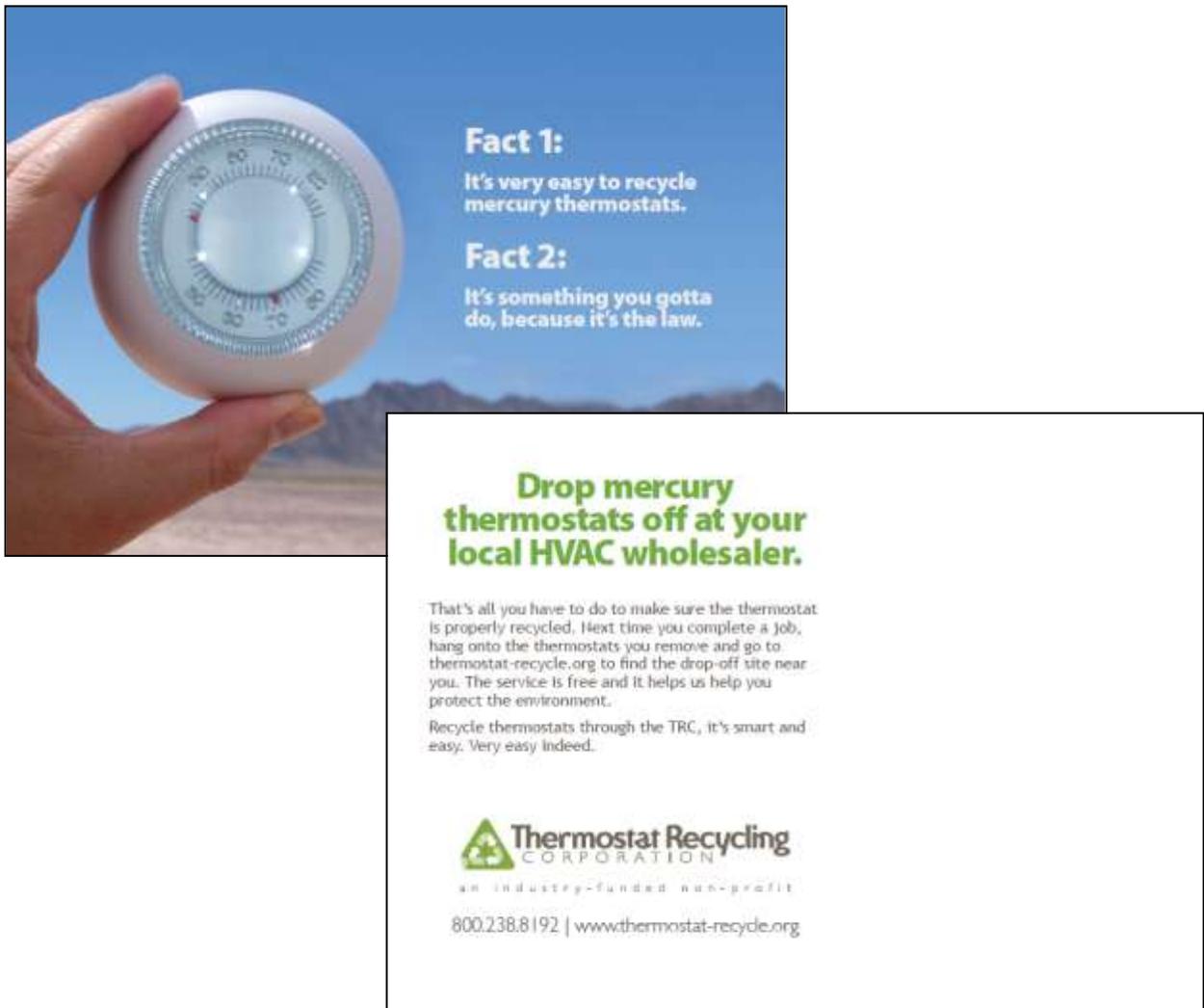


Exhibit 7: Stakeholder Outreach

Organization
RI Indep. Contractors & Assoc.
RI-PHCC
RI Builders Association
RI Master Plumbers Assn
NE ACCA
Oil Heat Institute of RI
NE Mechanical Contractors Assn

Program Expenses

TRC is a national voluntary program that is also operating nine mandatory programs on behalf of its manufacturer members. As most promotional activities are run concurrently in multiple states tracking and isolating expenses specifically to Rhode Island is not possible. Below is a summary of TRC's national program expenses for 2011. A copy of TRC's 2010 IRS Form 990 is also available for inspection.

Exhibit 8: 2011 Program Administrative Expenses

TRC Staff and Administration	\$	255,617
Recycling Costs	\$	299,877
Insurance	\$	13,945
Statutory Incentive Payments	\$	37,860
New Collection Containers	\$	18,859
Travel	\$	28,108
Legal	\$	93,272
Direct Expenses for Marketing & Outreach	\$	123,221
Total	\$	870,760

TRC expenses include:

- **TRC Staff and Administration:** Includes staff and consultants, general office expenses, telecommunications, and other administrative expenses. Includes staff labor costs to implement Rhode Island program.
- **Insurance:** Pollution and liability insurance.
- **TRC made \$37,860 in direct incentive payments on behalf of manufacturers as required by Maine and Vermont law.** This does not reflect the administrative costs associated with the incentive program.
- **Travel:** All travel in 2011 includes travel to trade shows to promote program.
- **Recycling Costs:** All costs (including labor) associated with transporting, processing, and properly managing waste thermostats. Also includes cost associated with fulfilling new bin orders and data management.
- **New Collection Containers:** Direct cost for new containers ordered in 2011.
- **Marketing/Outreach & Printing:** Includes direct costs to develop and print program collateral; direct mail, national and state advertising, sponsorships marketing consultants, some web and IT consulting, and other outreach activities. Marketing/Outreach does not include any TRC labor costs.

Recommendations/Next Steps

Rhode Island's thermostat law went into effect in January 1, 2011. While initial results are encouraging, significant challenges remain. TRC increased its collections of waste mercury

thermostats by 154% in 2011.¹ However, TRC fell short of the goal by nearly one thousand units.

The most significant barriers to growth are:

- Collection point engagement: TRC staff conducted site visits to HVAC wholesale locations in Rhode Island twice in 2011. Of the approximately 50 locations identified by TRC (a list of Rhode Island HVAC wholesale distributors can be procured for less than \$0.25 per record) TRC found only a limited number of locations *actively* collecting; in fact several were not collecting at all.
- HVAC contractor engagement: HVAC contractors are not taking advantage of TRC's program. Only a limited number of contractors are bringing waste thermostats to HVAC wholesalers and efforts to directly market the program to contractors (larger contractors may order a bin direct from TRC for the \$25 participation fee) have been for the most part ignored.
- Few opportunities for direct marketing: By TRC's estimates there are over 300 HVAC contracting businesses in Rhode Island employing several thousand technicians. Most do not belong to trade groups. The only Rhode Island specific direct marketing channel available to TRC is direct mail.
- HHW participation: TRC has received no product from Rhode Island Resource Recovery since the law's passage.

To increase collections TRC plans on continuing the following Rhode Island marketing efforts:

- Stakeholder engagement: TRC will again send letters and promotional materials and follow-up via telephone various organizations in Rhode Island encouraging them to educate their members about thermostat recycling.
- TRC will continue to send direct mail to Rhode Island HVAC contractors on at least a quarterly basis.
- Paid Advertising: TRC will continue to use paid advertising to promote the program. It is already advertising in OESP's weekly online newsletter and other options are currently under review.
- Earned media. TRC will continue to aggressively court the industry trade press and seek coverage of the program.
- Trade Shows: TRC will continue to attend and exhibit at national trade shows in 2011. Moreover, OESP's annual meeting is in Providence this year. TRC is a sponsor of the meeting and will exhibit at its trade show.
- Engage HVAC wholesale distributors: The distributors are essential to the program's success. Contractors must know their local distributor is collecting waste mercury thermostats. The program must be visible at each location and staff must be aware of the program. TRC is working directly with many distributors to increase the visibility of the program.
- Develop collaborative strategies with the Department to engage utilities and other stakeholders.

¹ TRC recovered no thermostats from Rhode Island Resource Recovery in 2011.

Appendix A: Sample of Correspondence to HVAC Wholesale Distributor locations in RI



Branch Manager
Company
Address
City, State Zip

December 20, 2010

RE: NEW LEGISLATION IN RHODE ISLAND AFFECTING WHOLESALE DISTRIBUTORS

Dear Branch Manager:

I am writing to inform you of recently passed legislation that affects your business. **If you do not act as a collection point for mercury-containing thermostats by February 1, 2011, you are prohibited from selling any thermostat at that location.** This stems from the passage of the RI Mercury Reduction and Education Act (RIGL Chapter 23-24.9). For more detailed information on what the new legislation requires, please see the enclosed document provided by the Rhode Island Department of Environmental Management.

Fortunately, for wholesalers who are not currently collecting mercury thermostats, a convenient collection/recycling program already exists. Manufacturers of mercury-containing thermostats are obligated to provide a low-cost recycling service to HVAC wholesale distributors and do so through the non-profit Thermostat Recycling Corporation (TRC). Founded in 1997, TRC facilitates the collection and recycling of all brands of mercury-containing thermostats.

For a modest one-time fee (currently \$25 per container) TRC will provide a sturdy plastic collection container that holds up to 100 waste thermostats as well as educational materials to help promote the program. TRC assumes all on-going costs for shipping and processing of the thermostats. It should be noted that TRC requires collection locations to ship only whole mercury-containing thermostats (no other mercury-containing products) with their covers intact, return the container at least once a year and promote the availability of the program to your customers.

If you would like to participate in TRC's program, please complete the enclosed form. Additional information is available by visiting our website (www.thermostat-recycle.org) or calling 703-841-3243. If you have questions about the implementation of law, please contact Beverly Migliore, RI DEM at Beverly.migliore@dem.ri.gov.

Best Regards,

A handwritten signature in black ink, appearing to read "Mark Tibbetts".

Mark Tibbetts
Executive Director

Appendix B: Sample of Correspondence to Corporate Offices of HVAC Wholesale Distributors in Rhode Island



December 21, 2010

RE: NEW LEGISLATION IN RHODE ISLAND AFFECTING WHOLESALE DISTRIBUTORS

Dear:

I am writing to inform you of recently passed legislation in the state of Rhode Island that affects your business. **By February 1, 2011, all HVAC wholesale distributors must act as collection points for mercury-containing thermostats. If they do not, distributors with facilities in Rhode Island are prohibited from selling any thermostats.** This stems from the passage of the RI Mercury Reduction and Education Act (RIGL Chapter 23-24.9). For more detailed information on what the new legislation requires, please see the enclosed document provided by the Rhode Island Department of Environmental Management.

Fortunately, for wholesalers who are not currently collecting mercury thermostats, a convenient collection/recycling program already exists. Manufacturers of mercury-containing thermostats are obligated to provide a low-cost recycling service to HVAC wholesale distributors and do so through the non-profit Thermostat Recycling Corporation (TRC). Founded in 1997, TRC facilitates the collection and recycling of all brands of mercury-containing thermostats.

For a modest one-time fee (currently \$25 per container) TRC will provide a sturdy plastic collection container that holds up to 100 waste thermostats as well as educational materials to help promote the program. TRC assumes all on-going costs for shipping and processing of the thermostats. It should be noted that TRC requires collection locations to ship only whole mercury-containing thermostats (no other mercury-containing products) with their covers intact, return the container at least once a year and promote the availability of the program to your customers.

We have also sent similar correspondence pertaining to this matter to your branches in Rhode Island. If you would like to participate in TRC's program, please either complete the attached form with the individual branches needing collection containers OR have the branches sign up individually with the forms TRC has provided them. For additional information or assistance, please contact Virginia Borchardt at 703-841-3243. Additional information is also available by visiting our website at www.thermostat-recycle.org. If you have questions about the implementation of law, please contact Beverly Migliore, RI DEM at Beverly.migliore@dem.ri.gov.

Best Regards,

A handwritten signature in black ink, appearing to read "Mark Tibbetts".

Mark Tibbetts
Executive Director

Appendix C: Memo to Larger TRC Members Regarding Rhode Island's Mercury Thermostat Law



January 11, 2011

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Mr. [REDACTED]

As a Thermostat Recycling Corporation (TRC) member, we wanted to share with you some information regarding legislation in the state of Rhode Island. Enclosed is a fact sheet, produced by the Rhode Island Department of Environmental Management. This fact sheet provides important information relevant to your customers' businesses. TRC appreciates any assistance that [REDACTED] may provide by sharing this information with its customers.

Thank you for your assistance. If you have any questions, please feel free to contact TRC's offices.

Best Regards,

Virginia Borchardt

Virginia Borchardt
Outreach and Communications

Appendix D: Correspondence to Rhode Island Retailers



February 23, 2011

[Redacted]

Subject: Voluntary participation in Thermostat Recycling Corporation's program in Rhode Island

Dear Mr. Maddocks:

At the request of the Rhode Island Department of Environmental Management the Thermostat Recycling Corporation (TRC) is sending this correspondence regarding the collection of waste mercury thermostats at [Redacted] locations in Rhode Island.

TRC is a not-for-profit funded by manufacturers that facilitates the collection and proper disposal of waste mercury thermostats. The program acts as a reverse distribution system in which collection containers are placed at businesses across the country. Each collection container comes with a pre-paid shipping label, a plastic liner, zip ties, and instructions on how to send the waste to our processing facility. TRC charges a nominal one-time nominal fee of \$25.00 (per container) to participate in the program. TRC assumes all recurring costs to ship and recycle the waste mercury thermostats.

If you are interested in collecting waste mercury thermostats at your Rhode Island locations please contact me at 703-841-3246 for more information on the program.

Thank you for your consideration of this request.

Sincere Regards,

Mark Tibbetts
Executive Director

Cc: Elizabeth Stone, Rhode Island Department of Environmental Management

Appendix E: Correspondence to HVAC Contractors



October 7, 2011

Salvatore Caiozzo
911 Plumbing & Heating LLC
42 Freeman St
Warwick, RI 02886-2022

COPY

Dear Mr Caiozzo:

I am writing to you on behalf of the Thermostat Recycling Corporation (TRC) and its member companies regarding the legal obligation for HVAC contractors to properly manage waste mercury thermostats in Rhode Island and how participation in TRC's program makes compliance easy.

As you may be aware, many older thermostats contain between 3 and 12 grams of mercury and are likely the largest remaining reservoir of mercury in households today. Rhode Island requires HVAC contractors to recycle all mercury thermostats they remove from service.

TRC is a non-profit corporation funded by manufacturers who historically distributed mercury thermostats in the United States. Founded thirteen years ago by industry leaders, the program has since grown to include thirty manufacturers and over 3,600 collection locations nationwide.

TRC's program is a simple reverse distribution system. Collection locations are provided with a plastic bin that comes with a liner, instructions and a pre-paid Federal Express label to be used to ship the bin to TRC's processing facility. Upon receiving a full bin, TRC empties it and sends it back to repeat the process.

If you have less than seven technicians, you may bring your waste thermostats to any HVAC supply house free of charge. Under the law they must collect waste thermostats. If you have more than seven technicians, we encourage you to participate directly in the program. By doing so, you can comply with various state laws in an easy, cost-effective manner. TRC charges a one-time participation fee of \$25.00 per container, but beyond that that TRC assumes all costs to transport and process the waste thermostats. All your technicians need to do is keep all mercury thermostats they remove from service and dispose of them in TRC recycling container(s) at your locations. When the container is full just ship it back to TRC using the pre-paid label.

Please feel free to contact us with any questions about disposal regulations or the program. Attached you will find a sign-up form. We may be reached at 888-266-0550 or by email at trc@thermostat-recycle.org.

Regards,

Mark Tibbetts
Executive Director

Appendix F: Correspondence to Public Service Directors²

² This is California version, the same letter was customized for Rhode Island.



July 29, 2011

COPY

Dear Public Service Director,

The Thermostat Recycling Corporation (TRC) is a not-for-profit organization that facilitates the collection and proper disposal of mercury-containing thermostats. Voluntarily founded by thermostat manufacturers, TRC's mission is to promote the safe collection and proper disposal of mercury-containing thermostats.

Mercury is a potent neurotoxin and by properly disposing mercury thermostats by recycling them is the best means of keeping it from the environment. Many people are replacing their old thermostats to save energy and it is important for them to know that many old thermostats contain mercury and should be recycled.

We would appreciate any support you can give us, within your community, by running this Radio PSA, giving your audience a chance to help protect California's environment.

Thank You for your time and consideration,

A handwritten signature in black ink, appearing to read "Mark Tibbetts", is written over a horizontal line.

Mark Tibbetts
Executive Director

Appendix G: Correspondence to Rhode Island Stakeholder Groups

COPY

Gino Burgio, President
Rhode Island PHCC
PO Box 6820, 15 New England Way
Warwick, RI 02887-6820

March 18, 2011

Dear Mr. Burgio:

I am writing this letter to bring your attention to legislation in Rhode Island requiring the proper disposal of mercury-containing thermostats and to ask for your assistance in raising awareness of this issue among your members. Under Rhode Island law, all HVAC wholesale distributors with a physical location in the state are required to act as collection points for waste mercury thermostats. Additionally, state law mandates that it is the responsibility of the contractor to ensure that all waste mercury thermostats they remove from service are disposed of properly.

Under this law, manufacturers who historically manufactured and branded mercury-thermostats are required to fund a take-back program. Thirty manufacturers support the Thermostat Recycling Corporation (TRC), which is implementing a program in Rhode Island. TRC works as a reverse distribution system. TRC provides collection bins as well as a plastic liner, zip ties, and a prepaid shipping label to collect whole mercury thermostats. Once the bin is full, collection locations ship the container using the prepaid shipping label to TRC's facilities. Once TRC empties the collection container, it will be returned to the collection location and restocked with the materials to resume collections.

Your members can bring whole mercury thermostats to their HVAC wholesale distributor to recycle free of charge. Additionally, your members are also able to collect waste mercury thermostats directly if they employ 7 or more technicians by paying a one-time participation fee of \$25.00. From that point on, TRC assumes all costs to ship and recycle the waste mercury thermostats.

Finally, included with this letter is copy to use for your newsletter or other member outreach activities. TRC appreciates any assistance your organization can provide in getting this information to HVAC contractors and wholesale distributors.

For more information on the program please visit TRC's website at <http://www.thermostat-recycle.org>. TRC can be reached by email at TRC@thermostat-recycle.org or by calling the undersigned at 703-841-3243.

Sincere Regards,



Virginia Borchardt
Thermostat Recycling Corporation

APPENDIX F: 2010 THERMOSTAT RECOVERY TOTALS BY LOCATION

Customer Name	City	Zip	Data	3	4	6	7	8	12	Grand Total
JOHNSTONE SUPPLY CO	CRANSTON	02907-3143	Sum of Total Stats	87				87		174
			Lbs Mercury	0.83			0.70		1.53	
F. W. WEBB CO	WARWICK	02888	Sum of Total Stats		62			60		122
			Lbs Mercury		0.88		0.40		1.28	
		02888-3814	Sum of Total Stats						70	70
			Lbs Mercury						1.72	1.72
PETRO	WARWICH	02886	Sum of Total Stats			101				101
			Lbs Mercury			0.68				0.68
STEDMAN & KAZOUNIS PLUMBING & HEATING CO INC	CHARLESTOWN	02813-3107	Sum of Total Stats				94			94
			Lbs Mercury				0.69			0.69
SUPPLY NEW ENGLAND	WARWICK	02886	Sum of Total Stats					23		23
			Lbs Mercury				0.91			0.91
R.E. MICHEL COMPANY, INC	PROVIDENCE	02907-0000	Sum of Total Stats					87		87
			Lbs Mercury				0.61			0.61

BELL SIMONS CO	PROVIDENCE	02904	Sum of Total Stats Lbs Mercury	105 0.85	105 0.85
GEM PLUMBING & HEATING	LINCOLN	02865- 4411	Sum of Total Stats Lbs Mercury	100 0.64	100 0.64
GEM PLUMBING & HEATING	LINCOLN	02865	Sum of Total Stats Lbs Mercury	93 0.73	93 0.73
GEM PLUMBING & HEATING	LINCOLN	02865	Sum of Total Stats Lbs Mercury	99 0.69	99 0.69
				87 62 101 94 362 362	1068
				0.83 0.88 0.68 0.69 3.47 3.78	10.32

APPENDIX G: Rhode Island locations have requested or been provided recycling containers.

Customer Type	Business Name	Address	City	ZIPCODE	ATTENTION	PHONE	Total
CONTRACTOR	STEDMAN & KAZOUNIS PLUMBING & HEATING CO INC	10 CROSSLAND	CHARLESTOWN	02813-0000	SHARON PADDOCK	401-364-9888	1
		10 CROSSLAND ST.	CHARLESTOWN	02813-3107	SHARON PADDOCK	401-364-9888	1
	GEM PLUMBING & HEATING	1 WELLINGTON ROAD	LINCOLN	02865-4411	ROBIN RECORD	401-459-4874	1
				02865	ROBIN RECORD	401-459-4874	3
	PETRO	1182 RIVER STREET	WOONSOCKET	02895-0000			1
		141 KNIGHT ST	WARWICH	02886	(blank)	(blank)	1
	NATIONAL GRID ENERGY SERVICES	56 DEWEY AVE.	WARWICK	02886-0000	MICHAEL MANSANI	781-359-2600	1
HHW FACILITY	RHODE ISLAND RESOURCE RECOVERY CORP. ECO-DEPOT	54 SHUN PIKE	JOHNSTON	02919	JOSEPH ROTELLA	401-942-1430	3
Wholesaler	JOHNSTONE SUPPLY CO	50 NIAN TIC AVE	CRANSTON	02907-3143	DAN BRIGGS	401-946-9444	1
	R.E. MICHEL COMPANY, INC	124 NARRAGENSETT AVE	PROVIDENCE	02907-0000	PATRICK BABALATO	401-461-1117	5
	R.E. MICHEL COMPANY, INC	85 CORLISS STREET, REAR	PROVIDENCE	02904-0000	ALAN WORNHAM	401-831-0433	2
	Sid Harvey Industries	95 PRINTERY ST.	PROVIDENCE	02904	Russell Tumsudan	401-521-9332	1
	The Granite Group	114 CROSS STREET	WESTERLY	02891	JOHN HAIK	401-596-7775	1
	TRANE	50 VISION BLVD.	EAST PROVIDENCE	02914	MAUREEN MUIR	401 434 3145	1
	BELL SIMONS CO	101 PRINTERY STREET	PROVIDENCE	02904	GERRY MUSTAVITZ	401-274-4180	1
	BELL SIMONS CO	176 UNION AVE.	PROVIDENCE	02909	KEVIN BOWMAN	401-944-0200	1
	SUPPLY NEW ENGLAND	361 JEFFERSON BLVD.	WARWICK	02886	FRED PATTERSON	401-739-8000	1
	SUPPLY NEW ENGLAND	273 LONSDALE AVE.	PAWTUCKET	02860	STEVE CANNING	401-722-7010	1
	SUPPLY NEW ENGLAND	1425 KINGSTOWN RD.	PEACEDALE	02883	DAVE CORNELL	401-789-0991	1
	SUPPLY NEW ENGLAND	119 OLIPHANT LANE	MIDDLETOWN	02842	STEVE JOHNSON	401-846-6830	1

Rhode Island DEM Thermostat Collection Report For Calendar Year 2011 Activities

FURNACE & DUCT SUPPLY CO. INC.	635 ELMWOOD AVE.	PROVIDENCE	02907	KEVIN NELSON	401-941-3800	1
SIMON'S SUPPLY CO INC	19 SLADE STREET	PAWTUCKET	02861	GARY DUCHARME	401 722 0200	1
HOMANS ASSOCIATES LLC	203 CONCORD STREET SUITE 431	PAWTUCKET	02861	DAVE GUERNOW	401-726-9300	2
COHEN HEATING SUPPLY COMPANY	38 BATH STREET	PROVIDENCE	02908	DONNA BROCCOLI	401-751-7200	1
VIKING SUPPLY CO	36 FRIENDSHIP STREET	WESTERLY	02841	JOHN KINDELAN	401-348-9220	1
F. W. WEBB CO	101 JEFFERSON BLVD	WARWICK	02888- 3814	BOB GALLAGHER	401-463-8339	1
UNITED REFRIGERATION INC	185 TORONTO AVENUE	PROVIDENCE	02905	TOM HIGGINS	401-467-3600	1
S. G. TORRICE CORP	300 NIAN TIC AVE	PROVIDENCE	02907	BRYAN TREMBLAY	401-490-4425	2
AUTOMATIC HEATING EQUIPMENT	400 CHARLES ST	PROVIDENCE	02904	Ted	401 521-8877	1
ARDEnte SUPPLY CO INC.	404 VALLEY STREET	PROVIDENCE	02908- 0000	MARK ARDEnte	401-861-1324	4
Smithfield Plumbing & Heating Supply	1 Austin Ave	GREENVILLE	02828	Phil Pasquarelli	401-949-0110	1
TRANE	50 VISION BLVD.	EAST PROVIDENCE	02914	MAUREEN MUIR	401 434 3145	1
ROBINSON PLUMBING & HEATING SUPPLY, CO	1 FREEWAY DRIVE	CRANSTON	02920	SCOTT MEIKLEJOHN	401-467-0200 EXT. 12	1
DELTA T DISTRIBUTING PROVIDENCE	89 CORLISS STREET	PROVIDENCE	02904- 2601	BRYAN FEATHER	401-861-1776	1
ATLANTIC SUPPLY	1000 TIOGUE AVE	COVENTRY	02816	JESSICA	401-823-0800	1
Grand Total						50