

Group B Outreach & Pilot Plan For the Collection of Mercury- Containing Thermostats in California

Presented to

California Department of Toxic Substances Control
(DTSC)

Prepared by

Thermostat Recycling Corporation
500 Office Center Drive, Suite 400
Fort Washington, PA 19034

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As required by the State of California’s Consent Order, signed by DTSC on February 10, 2016, and on behalf of the 25 signatories to that Consent Order, the TRC is pleased to submit this Group B Outreach and Pilot Plan document for your consideration and review.

Background

In implementing the principal Outreach Plan and Pilot Plan as approved by the DTSC in October 2016, the DTSC and the TRC agreed to categorize the full array of consent Order “audiences” into three groups. Group A includes those audiences most likely to yield success in collecting and properly disposing of out-of-service mercury-containing thermostats. These include HVAC contractors and retailers among others. TRC continues to give this group top priority

The second two groups, Groups B and C, include audiences deemed by both DTSC and TRC to be less likely to yield success in collecting mercury-containing thermostats. These are being given a lower priority. That said, it was agreed by DTSC that while primary focus be given to Group A, the TRC and its contractors would also look for the revelation of any opportunities within the Group B and C audiences, that would strengthen its Group A efforts and its overall efforts to successfully collect and properly dispose of out-of- service mercury-containing thermostats. This action was described as a scoping exercise. The TRC is required by the Consent Order to prepare and deliver to DTSC an Outreach Plan and Pilot Plan for the Group B audiences, based on lessons learned from this scoping exercise. This document is in response to that requirement.

The Thermostat Recycling Corporation’s (TRC) sole purpose is to collect and properly dispose of out-of-service mercury-containing thermostats nationwide. This draft Outreach and Pilot Plan (“the Plan”) proposes strategic tactics for a phase II implementation approach focused only on the Group B set of audiences which include the following:

Electric Utility Companies
Local Building Departments
School Districts
Universities and Colleges

Our scoping efforts to date suggest that, of the Group B audiences listed, one has emerged as an audience that may yield success in collecting and properly disposing of out-of-service mercury-containing thermostats. That audience is the electric utility companies. In our opinion these utility companies are most likely to come into contact with mercury-containing thermostats than the other entities in Group B. Consequently, we will engage this audience with the same vigor as we are giving to the Group A audiences. Meanwhile, we will continue our scoping of the remaining Group B audiences.

Outreach Plan Goals

In keeping with the requirements of the DTSC Consent Order, the overarching goal of the Plan is to provide a roadmap for increasing statewide program participation and improving collection results.

Two specific areas were identified by TRC and are addressed within this Plan:

1. Increase the collection of mercury-containing thermostats in California focusing resources on the audience most likely to come into contact with mercury-containing thermostats;
2. Increase engagement in California to ensure collected mercury-containing thermostats are returned to TRC.

Objectives

TRC intends to operate in accordance with the following key objectives:

1. Ensure the placement of additional bins with entities that collect mercury-containing thermostats through a comprehensive statewide effort focused on the electric utilities and their partners;
2. Develop materials and engagement tools to increase program participation and mercury-containing thermostat collection in California via this audience;
3. Engage existing partners throughout the State to promote the broadest understanding of TRC's collection program, as a means of increasing program participation, collecting mercury-containing thermostats and returning mercury-containing thermostat bins to TRC

Strategy

This Plan outlines a strategy for implementing second phase of outreach as laid out in the approved outreach plan submitted in August 2016 and approved in October 2016.

OUTREACH PLAN FOR GROUP B AUDIENCES

TRC has tasked Steve Hellem, Program Manager and Tom Murray, Project Coordinator to take the lead on this Electric Utilities effort for the TRC. TRC has also tasked its contractor, CADMUS, to produce key deliverables in support of this effort.

General Findings:

Our scoping of the group B audience set has revealed that, of the audiences listed there, the utilities audience offers the best opportunity to accelerate the collection of mercury-containing thermostats in California. This assertion is based on the following observations:

Some electric utilities on the east coast have already successfully conducted thermostat change-out programs leading to the collection and proper disposal of mercury-containing thermostats while improving energy efficiency.

Scoping Information pertaining to Exelon-owned Baltimore Gas & Electric of Maryland and selected thermostat manufacturers.

Many electric utilities in California and nationally are already engaged in thermostat replacement incentive programs and are willing to discuss the issue further. The electric utility industry is in the best position to induce HVAC contractors to collect mercury-containing thermostats. The electric utility industry, through its contracts with hazardous waste disposal facilities are similarly in a good position to track the disposal of collected mercury-containing thermostats. The electric utility industry may also remove thermostats through utility-led incentives/rebates programs, direct hires outside the HVAC audience or through a trade ally network.

Scoping information provided through phone calls with the Director of Sustainability and the Vice President of Supply Chain Management with Pacific Gas and Electric.

Electric utilities nationally have come together to address sustainability issues through the Electric Utility Industry Sustainable Supply Chain Alliance.

Scoping information provided through the Executive Director of the Electric Utility Industry Sustainability Supply Chain Alliance

The states of Illinois, New York and others are supporting efforts to more formally engage the utility industry.

Scoping information provided through TRC discussions in these states

Central to our outreach plan to engage the electric utility industry in California, are the following tactics:

Tactic 1: We will engage the Electric Utility Industry Sustainable Supply Chain Alliance in discussions focused on how best to accelerate energy-efficiency efforts in California and nationwide including the responsible replacement of mercury-laden thermostats.

We will develop a list of all utility sponsored thermostat replacement programs in California and nationwide. CADMUS, under contract to the TRC, will provide support to this effort. We will cross-reference TRC recycling centers with utility service territories and target information distribution to each utility, focusing on those that have thermostat replacement programs. We will distribute free TRC recycling containers, where needed, to support this utilities effort.

Metrics:

- Number of utilities engaged in thermostat-recycling and service area change-out programs nationally and in California.

Timeline:

- Discussions have begun and will continue at the AESP conference February 14-15, 2017 and through t direct contact with the California electric utilities.

- Cadmus discussions have begun and will inform discussions with the California utilities between now and June 2017

Tactic 2: We will engage the three major electric utilities in California -- Pacific Gas & Electric, SoCal Edison and San Diego Gas and Electric -- in discussions focused on accelerating the collection, tabulation and reporting of mercury-containing thermostats within their service areas. We will engage several of the major municipal utilities especially the Sacramento Municipal Utility District and the Los Angeles Department of Water and Power and selected rural facilities.

We seek the DTSC's assistance in setting up meetings with the California Public Utility Commission for TRC to discuss new thermostat recycling language in the California State Technical Reference Manual. We will distribute free TRC recycling containers, where needed, to support this utilities effort.

Metrics:

- Number of mercury-containing thermostats collected

Timeline:

- Initial contacts have been made with several of the California electric utilities. Meetings and teleconferences will be scheduled in the months of February and March 2017.
- Outputs and outcomes from those discussions will be concluded by June 30, 2017

Tactic 3: We will continue to explore key state utility thermostat replacement programs and related energy efficiency efforts operating outside the State of California and look for opportunities to draw from their success tactics that could benefit TRC's efforts under the California Consent Order.

TRC will attempt to engage new members who could add value to these efforts. For example, we will meet with the Illinois PUC to determine how to integrate thermostat recycling language into the Illinois Technical Reference Manual. We will attempt to educate both electric utility companies' business and residential customers by providing content for billing, web portals, and other customer channels. We will attempt to develop language which assists the utilities in monitoring compliance from direct installation measures. We are developing marketing collateral specific to all utility channels – *i.e.*, direct thermostat install program direct install contractor networks, and self-install (BYOT) channels.

Metrics:

- Number of new tactics adopted to support mercury-containing thermostat collection efforts in California
- Number of thermostats collected through these new tactics.

Timeline:

- We recommend that discussions with the California PUC be scheduled by DTSC by February 28, 2017.
- We will produce marketing and other standard language by March 1, 2017

Tactic 4: We will strengthen and expand collaborative efforts with non-governmental organizations and other relevant organizations as they pertain to this utility industry effort. In addressing this tactic, TRC staff will participate in relevant conferences and meetings which are typically attended by the Electric Utility industry and NGOs.

Metrics:

- Number of new contacts who can provide support to the collection of mercury-containing thermostats in California and nationally.

Timeline:

- TRC staff will be participating in the AESP conference scheduled for February 14-15, 2017. TRC is also collaborating with the Product Stewardship Institute in its efforts, under a U.S. Department of Agriculture grant, to help establish a hazard waste collection infrastructure within a select list of rural communities nationwide, including several in the State of California.

PILOT PROGRAM PLAN FOR GROUP B AUDIENCES

Because the electric utilities audience relies heavily on contractors in its routine business pertaining to thermostats, we will pilot our outreach plan with Electric Utilities following the general pilot program plan for contractors already approved by the DTSC. Moreover, we will fine tune our piloting efforts with this audience by aligning TRC efforts with existing Utilities' thermostat change-out programs.

