1765 Duke Street | Alexandria, VA 22314 | thermostat-recycle.org

VIA EMAIL and US Mail

February 27, 2015

Ms. Liz Stone 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 Suite 425 Providence, RI 02908-5767

Subject: Thermostat Recycling Corporation's 2013 Annual Report

Dear Ms. Stone and Ms. Migliore:

Attached is TRC's annual collection report for calendar year 2014. TRC has done its best to be responsive to the Department's request for expense and collection data. Collections of whole thermostats increased in Rhode Island by 7% in 2014, following a 53% increase in 2013. Out of thirteen mandatory programs, Rhode Island's participation rate ranks first with over 60% of the TRC collection locations returning one or more containers last year.

TRC would like to highlight some aspects of the 2014 program and share some observations of the program moving forward. They are as follows:

- TRC added two full-time employees in 2014. Ryan Kiscaden, Director of National Accounts, joined the staff in January and Alex Monie, Marketing and Operations Assistant, joined the staff in September.
- TRC staff was again actively "in the field" last year directly assessing wholesaler participation. TRC staff visited 34 locations throughout Rhode Island last year.
- TRC continues to emphasize collections will drop as the installed base of mercury thermostats diminishes over time. There simply cannot be as many mercury thermostats in Rhode Island today as there were in 2010 when the mandatory programs went into effect.

 Our analysis of collection data form Rhode Island and other states indicate the most significant driver of collections remains access to the program. We are seeing little evidence that increased marketing and promotion is increasing participation at existing locations. The best opportunity to increase collections is to increase participation within the existing network of locations, and more importantly, adding additional collection locations.

If the Department would like to discuss any of these items in greater detail please do not hesitate to contact me directly at 571-447-4315.

Sincere Regards,

Mark Tibbetts

Executive Director

Exhibit 1: 2014 Rhode Island Collections by Brand

Brand Holder	<u>Thermostats</u>	Count Switches	Pounds Mercury				
Burnham Holdings	3	3	0.02				
Carrier	106	257	1.59				
General Electric Corporation	4	8	0.05				
Goodman Global	54	146	0.91				
Grainger	5	5	0.03				
Honeywell	2,094	2,754	17.07				
Invensys	5	5	0.03				
Lennox	44	63	0.39				
Lux Products	9	9	0.06				
Marley-Wylain Company	3	3	0.02				
McQuay International	9	18	0.11				
Nordyne Corporation	43	43	0.27				
PSG Controls	1	2	0.01				
Rheem	9	10	0.06				
Sears Holdings	5	7	0.04				
Taco, Inc.	5	5	0.03				
TPI Corporation	1	1	0.01				
Trane	22	38	0.24				
White Rodgers	144	163	1.01				
York/Johnson Controls	65	126	0.78				
Non-Me	mber Brands						
AMERICAN STABILIS	2	2	0.01				
STEWART WARNER	1	1	0.01				
SCOTT	1	1	0.01				
Climatrol	1	1	0.01				
Mars	1	2	0.01				
LEXUS	2	2	0.01				
TEXACO	2	2	0.01				
REPCO	1	1	0.01				
CONTROLS COMPANY OF AMERICA	1	1	0.01				
NRC	2	2	0.01				
COLUMBIA	6	6	0.04				
FUEL CHIEF	1	1	0.01				
Newport Oil Corp	1	1	0.01				
VICMIR	3	3	0.02				
NOM (Manufacturer not Identifiable)							
NOM	5	5	0.03				
Loose Bulbs	0	82	0.51				
TOTAL	2,661	3,779	23.43				

In Rhode Island, TRC recovered the equivalent of 2,720 mercury thermostats from 2,661 whole mercury thermostats plus 82 thermostat mercury switches. This is 108% of the state's statutory performance goal.

Collections increased by over 7% compared to 2013.

TRC recovered 1,219 of thermostats from HVAC contractors, and 1,414 from HVAC wholesale distributor collection locations. Only 28 thermostats were recovered from HHW locations and there is no retail participation 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 nonconforming material.

The bin is returned to the location that sent it in with a new prepaid 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. If a bulb breaks and the mercury spills, the work area is designed to contain the spillage and the operators are trained in the clean-up and disposal of mercury. The 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 Veolia Environmental Services in Port Washington, Wisconsin for final processing of the mercury ampoules (switches) Veolia Environmental Services meets or exceeds all local, state, federal and EPA regulations for the management of the product. Veolia's approvals for mercury recovery/recycling include:

- EPA identification WIR000130591 (Veolia Environmental Services, Inc.)
- EPA BDAT Requirement satisfied by all recovery operations
- CERCLA (Comprehensive Environmental Response Compensation and Liability Act)
- Wisconsin Department of Natural Resources

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

Direct Mail

TRC utilized direct mail, targeting both collection locations and HVAC contractors/technicians.

Collection Locations—

 To encourage collection point participation and to stimulate timely return of TRC collection containers (necessary to remit incentive payments to participating technicians and

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homeowners) TRC periodically mailed postcards (Exhibit 2) to collection points that had not returned a TRC container within the last 12 months (in accordance with Rhode Island's Universal Waste Regulations). TRC mailed reminders in July to 13 collection sites.

Exhibit 2: "Miss You" Postcard





HVAC Contractors/Technicians—

 TRC developed an oversized 9x6 full-color postcard targeting larger contractors with more than 10 employees. TRC mailed this postcard twice in July to 46 contacts in Rhode Island and repeated the mailing two more times in August.

The postcard reminded HVAC contactors of their legal obligation to recycle mercury thermostats. The postcard also included a link to an online survey for an opportunity to win a 42" flat screen TV for completing the survey (Exhibit 3).

TRC received no requests for free recycling containers from Rhode Island contractors or survey responses.

Exhibit 3: 9x6 Summer Postcard



In December TRC developed a 4x6 full-color postcard. It was holiday themed and the
messaging centered on the gift of free mercury recycling (Exhibit 4). It was mailed to 558
HVAC contacts in Rhode Island.

Exhibit 4: Holiday Postcard



• Mouse Pad Mailing—TRC developed a branded mouse pad to direct mail by itself with no envelope to garner a higher open rate (Exhibit 5). This was sent in October to 24 HVAC contracting business companies in Rhode Island with more than 10 employees. The mouse pad included a sticker with a limited-time offer to sign up for a free TRC recycling container. It served as an awareness piece but TRC received no requests for containers from Rhode Island contractors.

Exhibit 5: Mouse Pad Mailing



Advertising

TRC's primary target remains HVAC contractors/technicians and HVAC wholesale distributors. For the contractors/technicians segment, TRC focuses on residential and light commercial contractors. The second segment is HVAC wholesale distributor locations, as they remain the most convenient location for the majority of Rhode Island-based technicians/contractors to purchase replacement thermostats and recycle waste mercury thermostats.

Homeowners remain a secondary market as they represent a small segment of the market (+/-10%). Since replacing a mercury thermostat is a rare event (if ever) for a consumer, TRC derives the greatest impact/value from its marketing activities by concentrating on the channel segment that conducts the vast majority of repeat thermostat replacements.

Data from TRC's previous advertising campaigns has found that contractors/technicians are influenced mostly by cost, convenience and laws/regulations. Therefore, TRC's 2014 advertising campaign continued to focus mostly on "easy and free" and "It's the law" messaging (where applicable, as only a limited number of states ban the disposal of mercury thermostats in solid waste and/or require HVAC contractors to recycle all mercury thermostats removed from service).

The purpose of TRC's advertisements were two-fold: 1) continue to build brand/program awareness and 2) increase program participation by raising awareness of specific legal obligations to recycle and the ease of recycling.

Print-based advertising — TRC again emphasized frequency of its 2014 advertising campaign and expanded the scope of the advertising campaign. Local trade channel options remain limited and past general consumer advertising in other states has led to no demonstrable increases in Page 5

collections. Therefore, TRC had no choice but to continue to primarily rely on national and regional trade publications like HVAC Insider New England.

TRC continued print-based advertisements in the following national/regional HVAC trade publications:

- HVAC Insider New England, a regional publication which has a monthly circulation of 8,940 that includes contractors, technicians, and wholesale distributors in Rhode Island. The advertisement was 1/2 page in size in 2-color and ran in the May, June, September and October issues. (Exhibit 6)
- Distribution Center Magazine, the exclusive publication of Heating, Air Conditioning & Refrigeration Distributors International (HARDI) with more than 11,000 bi-monthly subscribers. TRC ran a full-color 1/4 page ad in May and December promoting the Big Man on Planet competition. (Exhibit 7)
- HVACR Business Magazine, a national publication with approximately 34,000 qualified subscribers, of which approximately 1,544 are in New England. TRC ran a 2-color 1/4 page ad January – March. (Exhibit 8)

Exhibit 6: HVAC Insider New England Ad



Exhibit 7: Distribution Center Ad



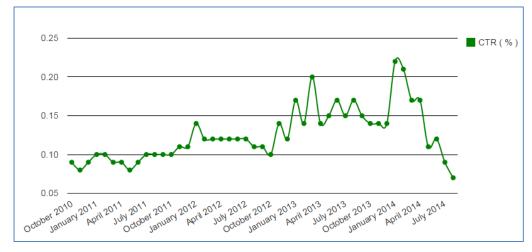
Exhibit 8: HVACR Business Magazine Ad



Web-based advertising — TRC continued the use of rotating banner advertisements in 2014, with changes in scheduling and scope and the addition of new outlets.

TRC's web-based ads gained a cumulative total of more than 906,000 impressions, and email ads were sent to more than 19,000 subscribers. An impression is a measure of the number of times an ad is displayed, and a CTR is the number of times a click is made on the advertisement divided by the total impressions. Exhibit 9 presents benchmark data from Google's Display Benchmarks tool on average CTR's in the U.S. by year. As seen below, the highest average CTR was 0.2%, so TRC's CTR performance exceeded the national average.

Exhibit 9: Google's Display Benchmarks Tool



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New advertising this year included:

- OESP Dedicated Eblast, emailed to 1,921 oil and energy service professionals
 predominantly from Rhode Island, Connecticut, Maine, Maryland, Massachusetts, New
 Hampshire, New Jersey, New York, Pennsylvania, Vermont and Virginia. The email was
 exclusively about TRC's program and offered a limited-time offer to sign-up for a free TRC
 bin. The email was sent in April and received 658 impressions and 33 website link clicks.
 (Exhibit 10)
- HVACR Business "Ahead of the Curve" Enewsletter, a monthly newsletter that reaches approximately 9,000 opt in readers each month. TRC ran a rotating banner ad in February, March and April. (Exhibit 11)
- ACHR News How-To Video, TRC's program training video was featured in the "how to" section of ACHRNews.com in July. The video received 148 views. The video was also featured on their YouTube page for the remainder of the year where it received an additional 352 views.
- Contracting Business Magazine dedicated Email blast, sent twice to 5,989 subscribers in states with disposal bans, including 56 in Rhode Island (Exhibit 12). The July mailing received 944 opens and a 16% CTR, and the September mailing received 775 opens and a 13% CTR, which the publisher indicated was a high open rate for them.

Exhibit 10: OESP Dedicated Eblast



Exhibit 11: HVACR Business Enewsletter Ad



Exhibit 12: Contracting Business Magazine Dedicated Email Blast



Are You Breaking the Law?



TRC Offers Free Recycling Container

Your state prohibits the disposal of all mercury thermostats in solid waste*. Many states go further by requiring all HVAC contractors to recycle every mercury thermostat removed from service — prohibiting them to leave them at the customer's premise. Violations can result in fines up to \$25,000 per day, depending on your state.

Thermostat Recycling Corporation (TRC) offers a program to help HVAC contractors comply with the law. As a non-profit, TRC provides mercury thermostat recycling containers to your local HVAC wholesalers to collect them at no cost to you.

If you are an HVAC wholesale distributor or contracting business with seven or more technicians, you may participate directly in TRC's program by ordering a collection container. Sign up by 10/31 and enter Promo Code CBEMAIL to receive a free recycling container that holds approximately 100 mercury thermostats and contains all necessary materials to return the container to TRC at no cost to you.

Visit www.thermostat-recycle.org to learn more about how easy it is to take advantage of the program.

*Disposal bans apply in the following states: CA, CT, FL, IA, IL, ME, MA, MN, NY, NH, OR, PA, RI, and VT.

Sign Up

TRC also continued web-based advertisements on the following HVAC industry websites below:

- ACHRNews.com, a website that assists the decision-makers from all branches of the air HVAC industry including contractors, manufacturers, distributors, parts and supply wholesalers, and service companies. More than 181,000 HVACR professionals visit the website every month, totaling more than 218,000 monthly website visits. TRC ran a banner ad January – March and October – December that resulted in 165,904 combined impressions and an average CTR of 0.1%. (Exhibit 13)
- ACHR Newsletter, a weekly email blast with more than 12,000 subscribers. TRC ran a banner ad for 4 issues in March with a total open rate of 11,740 and a CTR of 0.4%. (Exhibit 14)
- HVACRBusiness.com: TRC ran a banner ad in July that resulted in 6,638 impressions and a CTR of 0.32%. (Exhibit 15)
- **HVAC-Talk.com**, an online forum that averages 310,000 monthly visitors. TRC ran a rotating banner ad February March and September October which resulted in 283,397 total impressions and an average CTR of .06%. (Exhibit 16)
- OESP Advantage Enewsletter, a weekly email with 3,000 subscribers predominantly from Rhode Island, Connecticut, Maine, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island, Vermont and Virginia. TRC ran a banner ad for 12 consecutive weeks August – November which resulted in 11,365 total impressions and an average CTR of 0.2%. (Exhibit 17)

Exhibit 13: ACHRNews.com Ad



Exhibit 14: ACHR Newsletter Ad



Exhibit 15: HVAC Business.com



Exhibit 17: OESP Advantage Enewsletter



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Exhibit 16: HVAC-Talk.com



Google AdWords — Since 2011 TRC has deployed a Google AdWord campaign that geo-targets contractors/technicians and consumers (homeowners) in states with mercury thermostat disposal bans, including Rhode Island. Advertisements appear on Google search results pages after an individual searches terms related to TRC's mission (E.g. thermostat replacement, contracting recycling regulations, mercury thermostat recycling, programmable thermostats, etc.).

TRC continued this campaign in 2014 with enhancements to Rhode Island's landing page that included a direct link to the Rhode Island's state laws page (Exhibit 18). TRC launched the campaign in March, coinciding with the launch of the updated website, and ran it through calendar year.

TRC views this as the preferred option to reach consumers because of the campaign's extensive and targeted reach.

The Rhode Island campaign yielded 143,505 impressions with an average CTR of 0.27% (a rate consistent with this type of campaign).



Exhibit 18: Google AdWords Landing Page

TRC's Website

In March, TRC launched an updated website with enhanced functionality. Updates include:

- Find a Site page: updated to direct people to active collection sites within the program that have returned a TRC bin within 14 months. This assists homeowners and contractors/technicians in identifying convenient collection sites who are actively participating in the program. It also assists TRC in filtering out closed, consolidated or moved locations from search results. A new feedback form allows visitors to inform TRC if a site isn't collecting to ensure TRC has the most accurate data. This was the second most visited page on TRC's website after the homepage.
- State Recycling Programs: features a clickable map of the United States to easily view different state laws and regulations. This supports easier navigation and lists state-specific information about mercury thermostat disposal. This is the 3rd most visited page. The Rhode Island program page's language was revised and includes a link to the Rhode Island Department of Environmental Management website regarding state information on mercury thermostats.
- **Become a Collection Site:** now supports an online application to become a collection site, and PDF versions are still available as well. It is the fourth most visited page and accounted for more than 70 bin sign-ups throughout the year.
- Collection Partners: a new section that lists collection partner locations that have committed
 to offering TRC's mercury thermostat collection program at all of their locations within the
 continental U.S. This highlights information about each company and directs visitors to their
 websites to find out more. This gives TRC a new marketing value-add to participating
 companies to increase traffic to their websites.
- **Blog:** provides updates about TRC travels to trade shows, HVAC industry commentary, tips, etc.
- Highlights: shows select program accomplishments and offers factoids, testimonials and more
- Contact Us: a new online form to submit an inquiry directly to TRC. This was added to offer better communication with the TRC team and to assist with answering questions in a timely manner.
- **Veolia:** a partnership to assist visitors in recycling mercury-containing products other than thermostats.

Website traffic continued to grow in 2014. TRC increased its total annual visitors by 50% compared to 2013. There was an 87% increase of visitors from Rhode Island to TRC's website and the state ranked 20th among the country in terms of its share of visitors to the site, up from 26th in 2013. The

increase in traffic reflects the new redesign/enhancements, impact of paid trade channel advertising, Google Ad-word campaign, and search engine optimization efforts.

Earned Media

In 2014 TRC continued to enjoy positive and frequent coverage within the industry trade press, appearing more than 25 times through a variety of publications. TRC issued a number of media releases and most were picked up generating additional exposure for the program.

Notably, TRC continued to receive coverage and editorial pieces in industry leading publications such as *The Air Conditioning and Refrigeration News* (110,000 circulation), *Distribution Center Magazine* (circulation 11,000), *Indoor Environment & Energy Efficiency Magazine* (mailed to every ACCA member who specializes in residential, commercial, and industrial applications), and *RSES Journal* (239,640 Web visitors).

Trade Shows, Conferences & Presentations

TRC attended and/or exhibited at the following trade shows:

January 21 - 23: AHRI Expo

New York City, NY

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 42,887 from 1,942 companies. Specifically, just over 900 attendees were from New England.

March 3 – 5: Johnstone Supply Member Meeting

Nashville, TN

Johnstone Supply is a cooperative wholesaler distributor of HVAC parts and equipment with 350 locations nationwide, including one in Rhode Island. Johnstone's Annual Membership meeting is invitation only and TRC was once again invited to attend and exhibit as part of an ongoing effort with Johnstone's corporate staff to encourage and expand the cooperative's members' participation in the program. The event is well attended by owners and senior staff and it was a unique opportunity to engage directly with key decision makers.

March 17 – 19: The Indoor Environment & Energy Expo

Nashville, TN

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Co-presented by ACCA, this expo is the largest marketplace for the indoor environmental and energy services contracting industry. TRC staff exhibited and promoted the program to attending HVAC contractors.

March 31 - April 2: HVACR Excellence Educators & Training Expo

Las Vegas, NV

The nation's largest conference that is dedicated to providing professional development exclusively for HVACR educators and trainers. TRC staff exhibited and promoted the program to educators to include information on mercury thermostat recycling in their trainings.

April 28 – May 1: ACI National Home Performance Show (New)

Detroit, MI

Affordable Comfort, Inc. (ACI) is the leading educational resource for the home performance industry. ACI trade shows feature product manufacturers and distributors, educational institutions, utilities, nonprofits, government agencies, industry media, trade associations, energy consultants, and more. TRC staff exhibited at this show for the first time.

May 12 - 13: National Association of Oil and Energy Service Professionals

Mohegan Sun, CT

This was OESP's annual convention and trade show part one, with over 2,500 attendees representing close to 300 companies across New England. TRC staff again exhibited at this show.

June 10 – 11: New England Fuel Institute (NEFI) (New)

Worcester, MA

New England Fuel Institute (NEFI) is a nationally recognized organization of over 1,100 independent Oil, heat, propane, biofuel and motor fuel dealers and associated companies. TRC staff exhibited at this show for the first time.

August 4 – 6: Association for Energy Service Providers (AESP) Summer Conference (New) San Francisco, CA

AESP is the premier organization for professionals in the energy efficiency industry. Over 300 industry professionals attend the event including utility professionals and industry advisors/implementers. TRC staff exhibited at this show for the first time.

September 17 – 18: International Facility Management Association (IFMA) World Workplace Conference & Expo 2014 (New)

New Orleans, LA

Held annually, IFMA's World Workplace meets the educational and networking needs of professionals who support the built environment. IFMA promotes World Workplace year-round to

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more than 23,000 members in 85 countries; plus an additional 200,000 workplace professionals. TRC attended the show.

September 22 – 23: Oil and Energy Service Professionals Road Show

Gettysburg, PA

This was OESP's annual convention and trade show part two, with over 2,500 attendees representing close to 300 companies across New England. TRC staff again exhibited at the show.

September 25: The Granite Group Trade Show (New)

Manchester, NH

Granite Group features 29 branch locations throughout New England. In 2014, the company hosted three separate trade shows as part of a series to accommodate contractors and demonstrators in the region. TRC staff exhibited for the first time with 500 contractor attendees.

October 9: The Granite Group Trade Show (New)

Groton, CT

Part of the series also hosted in Manchester, NH in September. TRC staff exhibited for the first time with 520 contractor attendees.

December 6-9: Heating Air-conditioning and Refrigeration Distributors International (HARDI)San Antonio, TX

TRC staff again 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 its annual "Big Man on the Planet Award."

Other Program Activities

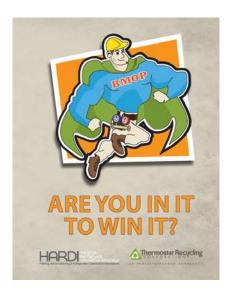
It is difficult to categorize and capture many of TRC's activities in a narrative based report. While paid placements and copy is easy to report, other outreach activities are more difficult to capture. Some examples of other program activities include:

- Site Visits to Rhode Island Wholesale Distributors TRC staff visited 34 collection locations
 that hadn't returned a bin primarily within the past 6-12 months. See Appendix A for more
 details.
- Outbound Calls to Collection Points TRC staff made 5 calls to collection locations that
 hadn't returned a bin in more than 12 months. Calls reminded locations of the need to comply
 with universal waste regulations and to assist with preparing the bin for shipment.

- Dunkin' Donuts Promotion In October TRC launched a gift card promotion at New England RE Michel locations, including the Providence, Rhode Island location. The promotion offers customers a \$5 gift card to Dunkin' Donuts for every five mercury thermostats they return, while supplies last. TRC provided each participating location gift cards and a full-color counter card to promote the program (Exhibit 19). The promotion is ongoing as of February 2015.
- Dump Bin Displays In July TRC developed branded displays to showcase the TRC container at HVAC wholesale distributor collection locations (Exhibit 20) and enhance the visibility of the program at HVAC wholesale collection locations. These displays were provided at no-cost to distributors nationwide, including several in Rhode Island.
- BMOP TRC partnered with Heating Air-conditioning and Refrigeration Distributors International (HARDI) for the third annual Big Man on Planet (BMOP) competition in 2014. In April TRC sent an invitation to 320 HARDI member Presidents/principals to encourage them to participate to see which distributor could recover the most thermostats (Exhibit 21). In 2014 TRC restructured the program to allow for multiple winners and included a \$500-\$1,000 incentive check to the top three branch locations who recycled the most, to serve as an employee incentive. Participation increased 67% over 2013, with 21 distributors competing with more than 1,000 locations nationwide. The competition ran May 1st October 31st and yielded 55,912 mercury thermostats.
- Social Media TRC's Twitter account saw a 15% increase in number of followers in 2014, and its Facebook page enjoyed a 21% increase of page "Likes"

Exhibit 19: Dunkin' Donuts Promotion Counter Card





Become Big Man on Planet by recycling the most mercury thermostats through Oct. 31

Earn bragging rights at the 2014 HARDI Annual Conference where one winner from each tier will be recognized:

• Tier 1: 1-10 branch locations
• Tier 2: 11-40 branch locations
• Tier 3: 41+ branch locations
Additionally, TRC will give a 5500 gift card to be used as an employee incentive to the branch that recycles the most mercury thermostats in each tier!

Sign up your location(s) at www.thermostat-recycle.org/bmop to participate by 5/31. Once signed up you will receive a promotional toolkit via Email to market your participation and help you on your quest to become BMOP.

Exhibit 20: Dump Bin Display



Program Expenses

Table 1: 2014 Program Administrative Expenses

Program Component	2013	2014	% Change
TRC Staff and Administration [†]	\$ 417,656	\$ 593,631	42%
Recycling Costs	\$ 317,874	\$ 356,043	12%
Incentive/Promotional Payments	\$ 23,955	\$ 47,712	99%
New Collection Containers	\$ 21,936	\$ 15,108	-31%
Travel	\$ 32,608	\$ 70,120	115%
Legal	\$ 27,696	\$ 40,373	46%
Direct Expense for Marketing & Outreach	\$ 194,761	\$ 289,347	49%
Total (expenses)	\$ 1,036,485	\$ 1,412,333	36%

There was significant variance in many expense categories from 2012 to 2013. Causes for changes include:

- TRC staff and administration increased by 42% in 2013. TRC added a full-time national account manager in January 2014 and one more full-time operations coordinator in September 2014, effectively adding three full-time positions since January 2013.
- Incentive/Promotional Payments: Incentive payments in Maine and Vermont continue to decline, but TRC ran a variety of promotional campaigns, including the promotion with R.E, Michel, in 2014 leading to increased expense.
- Travel: The national account manager spends about 60% of his time on travel, primarily visiting collection locations and attending industry events.
- Direct Expense for Marketing/Outreach: Marketing expense increased by nearly 49%. This
 reflects increases in advertising, printing and the production/distribution costs of the bin
 display which cost over \$28,000.

Program Adjustments

TRC plans on the following adjustments to its strategy in 2015:

- Visits to HVAC Wholesale Locations- TRC has scheduled 3-5 days of site visits in Rhode Island in 2015, consistent with the level conducted in 2014.
- Additional planned advertising (subject to change) include:
 - 1/4pg full-color ad in HVACR Business Magazine for 3 months
 - 1/4pg full-color ad in *Distribution Center Magazine* for 2 months

- 1/2pg two-color ad in HVAC Insider New England for 4 months
- Banner ad in the Advantage OESP Newsletter for 13 weeks
- OESP dedicated email blast 2 times
- Banner ad on HVAC-Talk.com for 4 months
- Contracting Business Magazine dedicated Eblast
- Banner ad on HVACR Business Magazine's website for 3 months
- Banner ad in HVACR Business Magazine's Eblast for 3 months
- Banner ad in *Distribution Center Magazine's* Eblast for 3 months
- Banner ad on ACHRNews.com for 3 months
- Banner ad in ACHR News' Eblast for 8 weeks
- Banner ad in the AHR Expo wrap-up Enews
- Text ad in NATE's Enewsletter for 2 months
- Expand frequency of Google AdWords/pay-to-click campaign
- Continued efforts to engage select wholesalers and larger contractors in New Hampshire.
 TRC plans to specifically target The Granite Group and Redlon & Johnson in 2015.

Program Evaluation

TRC recorded its first collections from Rhode Island locations in 2007, and achieved double digit collections in 2011¹. Collections demonstrably increased following the requirement for HVAC wholesalers to collect mercury thermostats went into effect in January 2010.

Table 2: TRC Rhode Island Collections (whole thermostats) Over Time

			%		%		%		%		%
	2009	2010	Change	2011	Change	2012	Change	2013	Change	2014	Change
Contractor	105	226	115%	487	115%	637	31%	1,140	79%	1,219	7%
HHW Facility	0		n/a	0	n/a	6	n/a	0	n/a	28	n/a
Wholesaler/Dist	549	194	-65%	581	199%	974	68%	1337	37%	1,414	6%
Grand Total	654	420	-36%	1,068	154%	1,617	51%	2,477	53%	2,661	7%

Collections continue to increase, albeit more modestly than in the first three years of the mandatory program. TRC highlights RISE Engineering's contributions to collections, with 989 units coming from one utility sponsored contractor. TRC notes that Rhode Island Resource Recovery Corporation shipped 28 units to TRC in 2014. This was the first shipment since 2012, but based

¹ TRC first recorded collections from nine states in 1998 and the program expanded to other states following their adoption of the Universal Waste Rule.

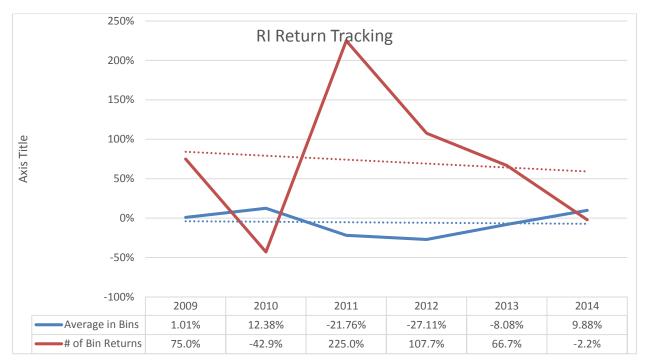
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upon the numbers, TRC believes the majority of thermostats collected through the HHW program continue to be processed by Clean Harbors.

Table 3: Counts TRC Bin Returns over Time (Rhode Island)

	2009	2010	2011	2012	2013	2014
Contractor	1	2	5	6	13	13
HHW Facility				1		2
Wholesaler/Dist	6	2	8	20	32	29
Grand Total	7	4	13	27	45	44

TRC also analyzed changes in the frequency of bin returns and quantity of thermostats in each bin.



The data illustrates the increased participation following the passage of the legislation and the long term negative trend in both the number of bins received and the number of units per bin.

Conclusions

TRC draws several conclusions from this analysis:

1. The program has benefited substantially from the participation of RISE Engineering. As long as their participation continues, TRC anticipates modest growth over the next two years.

2. The long term trends suggest that declines in the number of mercury thermostats being removed from service are weighing on returns as the number per bin declines over time. It is uncontestable that the number of thermostats available today and in the future is less than at the start of the mandatory program in 2010. Rhode Island banned the sale of mercury thermostats in 2006 (all major manufacturers ceased production by 2008) and mercury thermostat's share of the market was in decline prior to the sales ban. Vermont DEC collected data on the age of thermostats in TRC bins and the most frequent age was approximately 17 years. Thermostats installed in the late 1990's now comprise the majority recovered and as the age of thermostats recovered approaches the date of the sales ban, the decline in numbers available to recycle will likely accelerate.

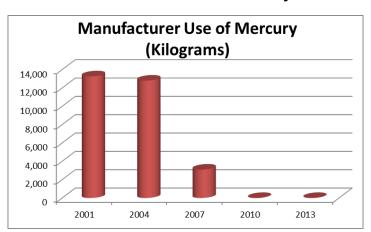


Table 4: Manufacturer use of Mercury in Thermostats (source NEWMOA)

- 3. TRC outreach improves frequency of bin returns. TRC now routinely contacts collection locations by mail, phone, and site visits.
- 4. At this point, education and promotion efforts in Rhode Island seem to have little substantive impact on increasing contractor/technician participation in the program. Moreover, there is no evidence that general consumer advertising has a meaningful impact on participation. Reviewing this report and past reports one sees the array of tactics employed in Rhode Island in an effort to improve program results. These include print consumer advertising, online trade and consumer advertising, stakeholder outreach, direct mail to contracting businesses, improvements to collateral for use at collections sites, etc.
- The data indicates that improving contractor/technician access to the program impacts
 collections by a far greater degree than education and promotion. The most substantive
 increases in collections followed the implementation of the mandate for HVAC wholesalers to
 collect.

- 6. TRC's promotion with RE Michel is ongoing until supplies last and we are waiting on the conclusion of the program to assess results. However, preliminary results suggest the program had little marginal impact on collections at the location.
- 7. Direct contractor participation in the program is limited and has not increased. Technicians with larger contracting businesses are less likely to visit HVAC wholesalers and greater direct participation by larger contractors is likely one of the best opportunities to increase collections in the future. TRC specifically targeted larger contractors in Rhode Island in 2014 but saw little change in their level of participation. TRC been working with a major contractor with offices in Rhode Island, Connecticut, and New York and anticipates greater direct participation in 2015.

In conclusion, TRC views the best opportunity for growth remains in increasing the number of collection locations actively participating in the program through increased wholesaler participation and/or increased direct participation by HVAC contractors. Otherwise, the long-term downward trend in number of units shipped per bin will continue to erode total collections in the state.

Appendix A: Collection Location Site Visits

Date of Visit	Account Name	City	State
06/12/2014 09:01 AM	R.E. Michel Company, Inc-Providence	Providence	RI
06/12/2014 09:03 AM	Supply New England-Pawtucket	Pawtucket	RI
06/12/2014 09:14 AM	Homans Associates Llc	Pawtucket	RI
06/12/2014 09:15 AM	Automatic Heating Equipment	Providence	RI
06/12/2014 09:17 AM	Sid Harvey Industries	Providence	RI
06/12/2014 09:19 AM	Bell Simons Co	Providence	RI
11/18/2014 06:35 PM	Robinson Plumbing & Heating Supply, Co	Cranston	RI
11/18/2014 06:24 PM	Supply New England-Warwick	Warwick	RI
11/18/2014 06:42 PM	Petro-Warwick	Warwick	RI
11/18/2014 06:47 PM	Atlantic Supply	Coventry	RI
11/18/2014 06:57 PM	R.B. Queern & Co. Inc.	Portsmouth	RI
11/18/2014 06:09 PM	Carrier-Bryant Northeast	Warwick	RI
11/18/2014 06:31 PM	F.W. Webb Co Warwick	Warwick	RI
11/18/2014 06:39 PM	Petro	Tiverton	RI
11/18/2014 06:51 PM	Plumbers' Supply Co Middletown	Middletown	RI
11/20/2014 06:06 AM	Furnace & Duct Supply Co. Inc.	Providence	RI
11/20/2014 06:16 AM	R.E. Michel Company, Inc-Providence 2	Providence	RI
11/20/2014 06:20 AM	John F. White & Co CLOSED	Providence	RI
11/20/2014 06:33 AM	Johnstone Supply-Providence	Providence	RI
11/20/2014 06:37 AM	Bell Simons Co-Providence	Providence	RI
11/20/2014 06:42 AM	Ardente Supply Co Inc.	Providence	RI
11/20/2014 06:46 AM	Cohen Heating Supply Company	Providence	RI
11/20/2014 06:51 AM	Simon'S Supply Co Inc-Pawtucket	Pawtucket	RI
11/20/2014 12:13 PM	Supply New England-Pawtucket	Pawtucket	RI
11/20/2014 12:25 PM	Homans Associates Llc	Pawtucket	RI
11/20/2014 12:24 PM	Santoro Oil Company	Providence	RI
11/20/2014 12:24 PM	Sid Harvey Industries	Providence	RI
11/20/2014 12:24 PM	Automatic Heating Equipment	Providence	RI
11/20/2014 12:28 PM	GEM Plumbing & Heating	Lincoln	RI
11/20/2014 12:30 PM	Petro-Woonsocket	Woonsocket	RI
11/20/2014 12:31 PM	Smithfield Plumbing & Heating Supply	Greenville	RI
11/20/2014 12:33 PM	Carjon Air Conditioning & Heating	Smithfield	RI
11/20/2014 12:52 PM	Delta T Distributing Warwick	Warwick	RI
11/20/2014 12:40 PM	Supply New England Peacedale	Peacedale	RI

APPENDIX B: 2014 Bin Receipt Report

Bin Number	Date	Location	City	State	Zip	Туре	Loose Switches	Total Stats	Total Volume
		RHODE ISLAND RESOURCE RECOVERY				HHW			
M13519	12/29/14	CORP. ECO-DEPOT	JOHNSTON	RI	02919	Facility	25	25	0.3286
M17998	12/12/14	RISE Engineering	Cranston	RI	02910	Contractor	0	125	0.7998
M16404	12/10/14	Delta T Distributors	Providence	RI	02904	Wholesalers	0	26	0.1674
M15736	12/5/14	FURNACE & DUCT SUPPLY CO. INC.	PROVIDENCE	RI	02907	Wholesalers	0	25	0.155
M15746	12/5/14	SIMON'S SUPPLY CO INC	PAWTUCKET	RI	02861	Wholesalers	0	47	0.3038
M16937	12/5/14	GEM PLUMBING & HEATING	LINCOLN	RI	02865	Contractor		13	0.155
M15148	12/4/14	SANTORO OIL CO.	PROVIDENCE	RI	02904	Contractor	12	54	0.4774
M15731	12/4/14	SUPPLY NEW ENGLAND	WARWICK	RI	02886	Wholesalers	0	17	0.1116
M15734	12/4/14	SUPPLY NEW ENGLAND	MIDDLETOWN	RI	02842	Wholesalers		9	0.0558
M15930	12/4/14	F. W. WEBB CO	WARWICK	RI	02888	Wholesalers	1	114	0.837
M15967	12/4/14	AUTOMATIC HEATING EQUIPMENT	PROVIDENCE	RI	02904	Wholesalers	20	19	0.248
M16002	12/4/14	SMITHFIELD PLUMBING & HEATING SUPPLY	GREENVILLE	RI	02828	Wholesalers		14	0.0868
M16235	12/4/14	ROBINSON PLUMBING & HEATING SUPPLY, CO	CRANSTON	RI	02920	Wholesalers		77	3.9122
M16834	12/4/14	ATLANTIC SUPPLY	COVENTRY	RI	02816	Wholesalers	0	23	0.1426
M18124	12/4/14	R.B. Queern & Co., Inc.	Portsmouth	RI	02871	Contractor	0	16	0.1054
M12746	12/3/14	JOHNSTONE SUPPLY CO	Providence	RI	02907	Wholesalers	0	52	0.527
M15978	12/3/14	ARDENTE SUPPLY CO INC.	PROVIDENCE	RI	02908	Wholesalers		6	0.0434
M15728	12/2/14	Plumber Supply Co	Middletown	RI	02842	Wholesalers		87	0.6758
M15942	11/20/14	S. G. TORRICE CORP	PROVIDENCE	RI	02907	Wholesalers	0	23	0.4154
M17667	11/14/14	Carrier Enterprise	Warwick	RI	02886	Wholesalers		6	0.0372
M15926	11/13/14	COHEN HEATING SUPPLY COMPANY	PROVIDENCE	RI	02908	Wholesalers		2	0.0124
M15152	11/11/14	SANTORO OIL CO.	PROVIDENCE	RI	02904	Wholesalers	0	86	0.62

M13175	11/5/14	R.E. MICHEL COMPANY, INC	PROVIDENCE	RI	02907	Wholesalers	0	104	0.6572
M17384	11/5/14	R.E. Michel Company, Inc.	Providence	RI	02907	Wholesalers		71	0.465
		RHODE ISLAND RESOURCE RECOVERY				HHW			
M13519	10/13/14	CORP. ECO-DEPOT	JOHNSTON	RI	02919	Facility		3	0.0186
M15151	9/10/14	SID HARVEY INDUSTRIES	PROVIDENCE	RI	02903	Wholesalers	9	117	0.8184
M17999	8/26/14	RISE Engineering	Cranston	RI	02910	Contractor	0	74	0.465
M13175	8/7/14	R.E. MICHEL COMPANY, INC	PROVIDENCE	RI	02907	Wholesalers	1	24	0.1612
M15731	8/6/14	SUPPLY NEW ENGLAND	WARWICK	RI	02886	Wholesalers	0	35	0.279
M15931	8/2/14	UNITED REFRIGERATION INC	PROVIDENCE	RI	02905	Wholesalers	0	40	0.4526
			East						
M15729	7/18/14	Plumber's Supply	Providence	RI	02914	Wholesalers	0	111	0.6882
M17381	7/10/14	RISE Engineering	Cranston	RI	02910	Contractor		132	0.8308
M13281	7/7/14	BELL SIMONS CO	PROVIDENCE	RI	02904	Wholesalers		5	0.031
M15942	5/19/14	S. G. TORRICE CORP	PROVIDENCE	RI	02907	Wholesalers		67	0.7502
M17389	5/7/14	RISE Engineering	Cranston	RI	02910	Contractor	0	141	0.8866
M15942	4/15/14	S. G. TORRICE CORP	PROVIDENCE	RI	02907	Wholesalers		94	1.0912
M17381	3/26/14	RISE Engineering	Cranston	RI	02910	Contractor	0	141	0.8866
M15931	3/25/14	UNITED REFRIGERATION INC	PROVIDENCE	RI	02905	Wholesalers	11	27	0.2356
M15728	3/18/14	Plumber Supply Co	Middletown	RI	02842	Wholesalers		45	0.5952
M15728	2/28/14	Plumber Supply Co	Middletown	RI	02842	Wholesalers		127	0.961
M17389	2/7/14	RISE Engineering	Cranston	RI	02910	Contractor	0	117	0.7254
M17381	1/22/14	RISE Engineering	Cranston	RI	02910	Contractor		122	0.7564
M17389	1/22/14	RISE Engineering	Cranston	RI	02910	Contractor	0	137	0.8494
M15114	1/2/14	H.V. Holland, Inc.	Jamestown	RI	02835	Contractor	3	61	0.6076

APPENDIX C: Thermostats Returned by Collection Location

Business Type	Collection Location Name	Street 1	City	State	Zip	Phone	Number of Bins at End of Report Date	Date Last Bin Received
Contractor	Buckley Heating & Cooling	1632 Kingstown Road	Peace Dale	RI	02879	401-789- 9711	1	
Contractor	Carjon Air Conditioning & Heating	4 Enterprise Lane	Smithfield	RI	02917		1	
Contractor	GEM PLUMBING & HEATING	1 WELLINGTON ROAD	LINCOLN	RI	02865	401-459- 4874	4	12/05/2014
Contractor	H.V. Holland, Inc.	2 Hammett Court	Jamestown	RI	02835	401-423- 0614	1	01/02/2014
Contractor	HOMESERVE USA	56 DEWEY AVE.	WARWICK	RI	02886	781-359- 2600	1	
Contractor	Kafin Oil Company	22 Hamlet Avenue	Woonsocket	RI	02895	401-765- 3881	1	
Contractor	Petro Holdings Inc.	1182 River Street	Woonsocket	RI	02895	401-767- 0400	3	
Contractor	Petro Holdings Inc.	550 Fish Road	Tiverton	RI	02878	401-736- 2340	3	
Contractor	R.B. Queern & Co., Inc.	200 High Point Avenue, Unit B7	Portsmouth	RI	02871	401-849- 0095	1	12/04/2014
Contractor	RISE Engineering	1341 Elmwood Avenue	Cranston	RI	02910	401-784- 3700	4	12/12/2014
Contractor	SANTORO OIL CO.	101 CORLISS ST	PROVIDENCE	RI	02904		9	12/4/2014
Contractor	STEDMAN & KAZOUNIS PLUMBING & HEATING CO INC	10 CROSSLAND	CHARLESTOWN	RI	02813	401-364- 9888	2	

Contractor	Woods Heating	22 Almeida Avenue	East Providence	RI	02914	401-434- 1487	1	
HHW Facility	RHODE ISLAND RESOURCE RECOVERY CORP. ECO-DEPOT	54 SHUN PIKE	JOHNSTON	RI	02919	401-942- 1430	3	12/29/2014
Wholesalers	ARDENTE SUPPLY CO INC.	404 VALLEY STREET	PROVIDENCE	RI	02908	401-861- 1324	4	12/03/2014
Wholesalers	ATLANTIC SUPPLY	1000 TIOGUE AVE	COVENTRY	RI	02816	401-823- 0800	1	12/04/2014
Wholesalers	AUTOMATIC HEATING EQUIPMENT	400 CHARLES ST	PROVIDENCE	RI	02904	401 521- 8877	1	12/04/2014
Wholesalers	BELL SIMONS CO	101 PRINTERY STREET	PROVIDENCE	RI	02904	401-274- 4180	1	07/07/2014
Wholesalers	BELL SIMONS CO	176 UNION AVE.	PROVIDENCE	RI	02909	401-944- 0200	1	
Wholesalers	Carrier Enterprise	33 Plan Way Bldg 1	Warwick	RI	02886	401-732- 7090	1	11/14/2014
Wholesalers	COHEN HEATING SUPPLY COMPANY	38 BATH STREET	PROVIDENCE	RI	02908	401-751- 7200	1	11/13/2014
Wholesalers	Delta T Distributors	89 Corliss Street	Providence	RI	02904	401-861- 1776	1	12/10/2014
Wholesalers	F. W. WEBB CO	101 JEFFERSON BLVD	WARWICK	RI	02888	401-463- 8339	1	12/04/2014
Wholesalers	FURNACE & DUCT SUPPLY CO. INC.	635 ELMWOOD AVE.	PROVIDENCE	RI	02907	401-941- 3800	1	12/05/2014
Wholesalers	HOMANS ASSOCIATES LLC	203 CONCORD STREET SUITE 431	PAWTUCKET	RI	02861	401-726- 9300	2	
Wholesalers	JOHNSTONE SUPPLY CO	50 NIANTIC AVE	Providence	RI	02907	401-946- 9444	1	12/03/2014

Wholesalers	PETRO	141 KNIGHT ST	Warwick	RI	02886		3	
Wholesalers	Plumber Supply Co	305 Oliphant Ln	Middletown	RI	02842		1	12/2/2014
Wholesalers	Plumber's Supply	41 Commercial Way	East Providence	RI	02914		1	07/18/2014
Wholesalers	R.E. MICHEL COMPANY, INC	85 CORLISS STREET,REAR	PROVIDENCE	RI	02904	401-831- 0433	2	
Wholesalers	R.E. Michel Company, Inc.	124 Narrangassett Avenue	Providence	RI	02907	401-461- 1117	9	11/05/2014
Wholesalers	ROBINSON PLUMBING & HEATING SUPPLY, CO	1 FREEWAY DRIVE	CRANSTON	RI	02920	401-467- 0200 EXT. 12	1	12/04/2014
Wholesalers	S. G. TORRICE CORP	300 NIANTIC AVE	PROVIDENCE	RI	02907	401-490- 4425	1	11/20/2014
Wholesalers	SID HARVEY INDUSTRIES	89 CORLISS ST	PROVIDENCE	RI	02903	401-521- 9332	1	09/10/2014
Wholesalers	SIMON'S SUPPLY CO INC	19 SLADE STREET	PAWTUCKET	RI	02861	401 722 0200	1	12/05/2014
Wholesalers	SMITHFIELD PLUMBING & HEATING SUPPLY	1 AUSTIN AVE.	GREENVILLE	RI	02828	401-949- 0110	1	12/04/2014
Wholesalers	SUPPLY NEW ENGLAND	119 OLIPHANT LANE	MIDDLETOWN	RI	02842	401-846- 6830	1	12/04/2014
Wholesalers	SUPPLY NEW ENGLAND	1425 KINGSTOWN RD.	PEACEDALE	RI	02883	401-789- 0991	1	
Wholesalers	SUPPLY NEW ENGLAND	273 LONSDALE AVE.	PAWTUCKET	RI	02860	401-722- 7010	1	
Wholesalers	SUPPLY NEW ENGLAND	361 JEFFERSON BLVD.	WARWICK	RI	02886	401-739- 8000	1	12/4/2014

Wholesalers	THE GRANITE GROUP	114 CROSS STREET	WESTERLY	RI	02891	401-596- 7775	1	
Wholesalers	TRANE	50 VISION BLVD.	EAST PROVIDENCE	RI	02914	401 434 3145	2	
Wholesalers	UNITED REFRIGERATION INC	185 TORONTO AVENUE	PROVIDENCE	RI	02905	401-467- 3600	1	8/2/2014
Wholesalers	VIKING SUPPLY CO	36 FRIENDSHIP STREET	WESTERLY	RI	02841	401-348- 9220	1	
Closed Locations								
Wholesalers	JOHN F. WHITE & CO.	31 NARRAGANSETT AVE.	PROVIDENCE	RI	02907	401-461- 3333	0	