# **2023 ANNUAL REPORT**

# PENNSYLVANIA





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# THERMOSTAT RECYCLING CORPORATION GOVERNANCE

### **Thermostat Recycling Corporation Board Members**

Arnie Meyer (Chairman) Resideo / Honeywell Home (f/k/a Honeywell)

Charles Ketterer (Vice-Chairman) Emerson Technologies (White Rodgers)

Bob Johnson (Treasurer) Lennox Industries

### **Thermostat Recycling Corporation Dues Paying Members**

Bard Manufacturing Company, Inc.	ITT Inc.
Burnham LLC	Johnson Controls
Carrier Corporation	Lennox International Inc.
Chromalox, Inc.	Google
ClimateMaster, Inc.	Nortek Global HVAC, LLC
Crane Company	Rheem Manufacturing Company
Daikin Applied (McQuay)	Schneider Electric USA, Inc.
Dwyer Instruments, Inc.	Taco, Inc.
ecobee	The Marley-Wylain Company
Empire Comfort Systems	TPI Corporation
General Electric Company	Trane Residential Systems
Goodman Distribution, Inc.	Uponor, Inc.
Ademco Inc., wholly owned subsidiary of Resideo Technologies, Inc. (Honeywell Home)	W. W. Grainger, Inc.
Hunter Fan Company	White Rodgers, a division of Emerson Electric Co.

Thermostat Recycling Corporation Staff

Danielle Myers Executive Director

Dahlia Brennan Operations Administrator

### LETTER FROM THE EXECUTIVE DIRECTOR

As we move forward, it becomes increasingly difficult to maintain the same level of mercury thermostat collections because we continue to make strides toward eliminating every last mercury thermostat. We are dedicated to fulfilling TRC's mission to promote the safe collection and proper disposal of mercury-containing thermostats while keeping mercury out of the waste stream in order to protect the environment.

As existing regulations around manufacturer funded mercury thermostat collections sunset, we remain steadfast in our efforts and will continue to collect mercury containing thermostats in all 48 contiguous states. We appreciate that legislators recognize our decades of effort and success.

TRC will continue to target mercury thermostat collections and work with our partners in the HVAC industry, the waste sector, the energy sector, and the regulatory community to achieve positive results. As you might expect, our numbers will decrease because of our previous successes, but our diligence and dedication remain.

We are happy to provide you with this year's annual report. Please do not hesitate to contact us with comments or questions.

Sincerely,

Danielle Myers

Danielle Myers, Executive Director

## PENNSYLVANIA

### **2023 Collections and Evaluation**

The following analytical report details the annual program performance for mercury thermostat collection in the state of Pennsylvania in 2023.

A few of the program highlights for 2023 are included below:

- In 2023 the program **collected 56.7 lbs. of mercury** in Pennsylvania. Since 2001, the annual quantity of mercury collected in Pennsylvania has averaged 73.3 lbs.
- The program collected **6,086 whole thermostats in 2023**. This was a 22% increase over the number of thermostats collected in 2022. Since 2001, the average thermostat count per year is 7,694.
- The number of whole thermostats collected per bin in 2023 was 40 thermostats, a decrease from 39 in 2022.
- The counties with the most bins and thermostats returned in 2023 were Dauphin County (11 bins, 658 thermostats), Bucks County (8 bins, 556 thermostats), and Lancaster County (5 bins, 430 thermostats).
- In 2023, 45% of the partner locations returned at least one bin.
- A total of 40 site visits and 236 'Miss You' calls were completed in 2023.
- In addition to 6,086 whole thermostats, 1,096 loose switches were collected, bringing the total number of "thermostat equivalents" returned in 2023 to 6,915, an increase of 31% from 2022.

### Section 1: Program Analytics

Section 1 of this report examines the annual performance of the thermostat collection recycling program in terms of bins, thermostats, and mercury collected as well as the year-over-year progression of the program. On average, the program has collected 73 lbs. of mercury and 7,694 whole thermostats per year since 2001. In 2023, the program collected 56.7 lbs. of mercury from 6,086 thermostats and 1,096 loose switches. Figure 1 below displays the total number of bins, the total number of thermostats, and the quantity of mercury collected in Pennsylvania since the beginning of the program.

Figure 1 - Program Performance Over Time						
Year	Number Bins	Number Thermostats	Mercury (Lb)			
2001	20	1.632	16.8			
2002	28	2.242	25.8			
2003	33	2.548	25.8			
2004	55	4,632	46.2			
2005	52	4,968	46.0			
2006	72	7,019	59.4			
2007	71	6,175	64.2			
2008	88	7,560	72.2			
2009	91	7,320	82.7			
2010	114	9,500	99.1			
2011	175	14,411	133.2			
2012	169	11,406	114.8			
2013	165	12,696	119.5			
2014	226	14,201	133.0			
2015	256	14,338	130.1			
2016	211	9,676	88.8			
2017	210	10,674	94.4			
2018	206	9,763	92.5			
2019	191	9,213	80.6			
2020	117	5,733	49.4			
2021	157	7,572	81.2			
2022	121	5,001	44.3			
2023	119	6,086	56.7			
Total	2,950	184,644	1,759.2			
Average	123	7,694	73.3			

Figure 2 displays the number of bins collected in Pennsylvania since the initiation of the collection program, as well as the total number of bins collected in the U.S. over the same period. The number of bins collected in Pennsylvania has generally increased from 2000 to 2011. In 2014, bin returns increased again, peaking with highest number of bins returned in 2015 with 256 bins. In 2023, the number of bins returned was 119 bins.



The 56.7 lbs. of mercury collected in Pennsylvania in 2023 was 28% higher than the 44.3 lbs. collected in 2022. Figure 3 displays the quantity of mercury collected in Pennsylvania over time as well as the annual percent change in Pennsylvania and nationally.

Figure 3 - Quantity (Lb) of Mercury Collected in Program and Annual Changes to Pennsylvania and Nationally						
Year	Mercury (Lb)	% Change Pennsylvania	% Change Nationally			
2001	16.8	570%	89%			
2002	25.8	5496	1496			
2003	25.8	096	1196			
2004	46.2	79%	1796			
2005	46.0	096	1196			
2006	59.4	29%	3296			
2007	64.2	896	296			
2008	72.2	1296	1696			
2009	82.7	1496	1696			
2010	99.1	2096	26%			
2011	133.2	3496	496			
2012	114.8	-1496	-596			
2013	119.5	496	-596			
2014	133.0	1196	1396			
2015	130.1	-296	-196			
2016	88.8	-3296	-1596			
2017	94.4	696	-796			
2018	92.5	-296	-4296			
2019	80.6	-1396	596			
2020	49.4	-3996	-3596			
2021	81.2	6496	596			
2022	44.3	-4596	-2896			
2023	56.7	28%	196			
Average	73.3					

Pennsylvania collected 6,086 thermostats in 2023. This was a 22% increase from the number of thermostats collected in 2022. Figure 4 displays the total number of thermostats collected in Pennsylvania and nationally, and Figure 5 shares the underlying data as well as the calculated annual percent change.



# Figure 5 - Whole Thermostats Collected in Pennsylvania and Nationally Over Time and Annual Percent Change

Year	Number Thermostats	% Change Pennsylvania	% Change Nationally
2001	1,632	48796	
2002	2,242	3796	2796
2003	2,548	1496	796
2004	4,632	8296	23%
2005	4,968	796	8%
2006	7,019	4196	30%
2007	6,175	-1296	096
2008	7,560	2296	1996
2009	7,320	-396	1596
2010	9,500	3096	28%
2011	14,411	5296	096
2012	11,406	-2196	-596
2013	12,696	1196	-496
2014	14,201	1296	1296
2015	14,338	196	-296
2016	9,676	-3396	-1896
2017	10,674	1096	-396
2018	9,763	-996	-1196
2019	9,213	-696	-5%
2020	5,733	-3896	-36%
2021	7,572	3296	996
2022	5,001	-3496	-21%
2023	6,086	22%	-9%
Average	7,694		

Figure 6 displays the monthly distribution of bins and thermostats collected in Pennsylvania in 2023. The months with the greatest number of thermostats returned were March (843 thermostats, 17 bins) and May (1,001 thermostats, 21 bins). The month with the greatest number of bins returned was May (21 bins). Conversely, the month with the least activity in 2023 was June.



The highest number of thermostats per bin returned occurred in February (93.3 thermostats per bin each month). Figure 7 shows the average number of thermostats per bin returned per month for the year.



Figure 8 displays the average number of thermostats returned per bin in Pennsylvania and in the U.S. since the beginning of the Pennsylvania program. Nationally, the number of thermostats per bin has been decreasing annually since 2000. In Pennsylvania a similar pattern is observed, with the exception of a few years. The number of thermostats per bin in 2023 (40 thermostats per bin avg.) increased from 2022 (39 thermostats per bin avg.).



Figure 9 plots the total bins returned over time along with the average number of thermostats per bin over the same period. In general, the number of bins returned in Pennsylvania increased steadily from 2000 to 2015. At the same time, thermostats per bin generally grew until 2006, after which the trend in thermostats per bin dropped. A negative correlation has been identified between the number of bins returned and the number of thermostats per bin.



### SECTION 2: Channel Partner Analysis

Section 2 of the report examines the partner locations in more detail. Most thermostats collected in Pennsylvania were through wholesalers (92.2%) with the remaining thermostats collected by contractors and HHWs. Figure 10 shows the distribution of thermostats collected by location type in 2023.



The number of bins returned in 2023 remained steady across wholesalers and HHWs from 2022 levels. Figure 11 displays the change in the number of bins returned by thermostat collection type over time in Pennsylvania.



In 2023, 45% of Pennsylvania locations possessing a collection bin sent back at least one bin for recycling. The distribution is displayed in Figure 12.



Figure 13 displays the total bins and thermostats returned by county in 2023. An analysis of the top performing counties revealed that Dauphin County (11 bins, 658 thermostats), Bucks County (8 bins, 556 thermostats), and Lancaster County (5 bins, 430 thermostats) returned the greatest number of bins and thermostats in 2023.

Figure 13 - Bins Returned and Total Thermostats Returned 2023				
by County				
	Number Thermostate	Number Ping		
Dauphin	658	Number bills		
Bucks	556	8		
Lancaster	430	5		
Lehigh	391	5		
York	391	9		
Berks	313	6		
Montgomery	303	7		
Allegheny	250	9		
Delaware	218	6		
Butler	213	2		
Chester	207	-		
Philadelphia	204	6		
Erie	197	2		
Cumberland	192	3		
Northampton	153	3		
Mifflin	114	1		
Columbia	104	2		
Blair	100	1		
Lycoming	96	1		
Centre	89	3		
Fayette	84	1		
Luzerne	77	2		
Cambria	76	1		
Mercer	74	1		
Lackawanna	73	4		
Washington	67	1		
Franklin	59	1		
Union	49	1		
Monroe	40	2		
Crawford	38	1		
Indiana	34	1		
Bedford	31	1		
Lebanon	26	1		
Westmoreland	16	2		
Adams	6	1		

TRC partner R. E. Michel (1,811 thermostats) returned the highest number of thermostats in Pennsylvania in 2023, followed by Johnstone Supply (1,285 thermostats) and APR Supply (735 thermostats). Apart from these locations, one other program partner returned more than 300 thermostats each. Figure 14 displays the top performers in terms of total thermostats returned in 2023.



Figure 15 includes the top performers for 2023 by each of the following categories: total bins returned, total thermostats returned, and average number of thermostats per bin.

## Figure 15 - Top 10 Performing Partners by Total Bins, Total Thermostats, and Average Thermostats per Bin

	Number Thermostats	Number Bins	Average Thermostats per Bin
R. E. Michel Co.	1,811	25	72
Johnstone Supply	1,285	18	71
Apr Supply	735	16	46
Dauphin County Recycling Center	335	3	112
United Refrigeration	285	15	19
Sid Harvey	220	4	55
Peirce-Phelp, Inc.	216	4	54
Us Supply	125	5	25
Burkholder's Hvac	123	1	123
Brinker Fuels	114	1	114

TRC conducted several activities in 2023 to increase the number of bins and thermostats returned in Pennsylvania. These activities included 'miss you' calls to collection locations that may not have returned a bin recently. In 2023, there were 40 site visits completed. Figure 16 displays the relationship between the number of site visits per month, the bins returned per month, and the number of thermostats (in 100's) returned per month.



Figure 17 displays the relationship between the number of calls per month, the bins returned per month and the number of thermostats (by 100's) returned per month. In 2023, a total of 236 'miss you' calls were placed. Calls were placed in the months of February, March, May, and October.



### SECTION 3: Comparisons to National and Other States' Data

To compare how the Pennsylvania collection partners performed in 2023, the national average for the number of bins returned per location that returned at least one bin was calculated and compared to the Pennsylvania average since 2012. The average number of bins does not include locations that did not return any bins in that year. It should be noted that when making comparisons each state has different regulations, a different mix of housing types, local policies, and incentives that may have a unique impact on returns. Overall, the average number of bins returned per location per year was lower in Pennsylvania than the U.S. average, as shown in Figure 18.



Figure 19 displays the locations in Pennsylvania that returned more than one bin in a given year since 2019, and Figure 20 displays the top 10 partners in the U.S. over the same period in terms of the number of bins returned.

Figure 19 - Partner I	Locations in Pennsylvania F	Returning More than 1 Bin per Last 4 Years	
	2019	2021	
R.E. Michel Co.	42	R. E. Michel Co.	41
Johnstone Supply	20	Johnstone Supply	19
United Refrigeration	15	United Refrigeration	13
Apr Supply	11	Apr Supply	10
Hvac Distributors, Inc.	10	Meier Supply Company, Inc.	7
Ferguson	9	Johnson Controls	5
Meier Supply Company, Inc.	7	Hvac Distributors, Inc.	4
Johnson Controls	6	Lennox	4
Robertson Heating Supply Co.	5	Sid Harvey	4
Us Supply	5	R.F. Fager Co.	3
Lennox	3	Allentown Recycling & Solid Waste	2
Peirce-Phelo Inc	4	Bucks County Planning Commission	2
Grove Supply Inc.	4	Epsco	2
Grove Supply Inc.	3	Ferguson	2
Ciyde S. Walton, Inc	2	Goodman Distribution	2
R.F. Fager Co.	2	Grove Supply Inc.	2
Refrigeration Sales Corp	2	Hannabery Hvac	2
Riley Sales	2	Robertson Heating Supply Co.	2
	2020	Thos. Somerville Co.	2
		Tom Antonelli Inc	2
R. E. Michel Co.	31	Trane	2
Johnstone Supply	18	Us Supply	2
Apr Supply	9	2022	
United Refrigeration	9		
Ferguson	5	R. E. Michel Co.	26
Lennox	4	Johnstone Supply	17
Peirce-Phelp, Inc.	4	Apr Supply	11
Hvac Distributors, Inc.	3	United Refrigeration	11
Robertson Heating Supply Co.	3	Peirce-Phelp, Inc.	6
Trane	3	Sid Harvey	6
Grove Supply Inc.	2	Ferguson	4
Sid Harvey	2	Robertson Heating Supply Co.	4
Thos. Somerville Co.	2	Associated Refrigeration Inc. (ARI)	З
Us Supply	2	Grove Supply Inc.	3
		Hvac Distributors, Inc.	3
		Goodman Distribution	2
		Meier Supply Company, Inc.	2
		Thos. Somerville Co.	2
		Trane	2

2023	
R. E. Michel Co.	25
Johnstone Supply	18
Apr Supply	16
United Refrigeration	15
Us Supply	5
Peirce-Phelp, Inc.	4
Sid Harvey	4
Dauphin County Recycling Center	3
Ferguson	3
Meier Supply Company, Inc.	3
Lennox	2
Robertson Heating Supply Co.	2
Trane	2

### Figure 20 - Top 10 Performing Partner Locations Nationwide in Bins Returned Last 4 Years

2020	2022
Johnstone Supply	47 Johnstone Supply 246
R. E. Michel Co.	58 R.E. Michel Co. 157
United Refrigeration	87 United Refrigeration 80
Ferguson	72 Ferguson 46
Us Air Conditioning Distri	56 Us Air Conditioning Distri 43
Lennox	47 Lennox 42
Sid Harvey	36 Refrigeration Supplies Di 42
F.W. Webb	30 Watsco 35
Wheelabrator	22 Sid Harvey 32
Rise Engineering	13 F.W. Webb 31
2021	2023
Johnstone Supply	03 Johnstone Supply 213
R. E. Michel Co.	90 R. E. Michel Co. 113
United Refrigeration	23 United Refrigeration 86
Ferguson	69 Ferguson 59
Lennox	60 Lennox 41
Goodman Distribution	46 Goodman Distribution 33
Refrigeration Supplies Di	39 US Air Conditioning Distributors (USACD) 33
Watsco	38 F.W. Webb 31
F.W. Webb	37 Refrigeration Supplies Distributor (RSD) 30

Figure 21 displays total percentage of locations that actively participated in the program (active participation defined as sending back at least one bin) in 2023, for all the states that mandate thermostat returns reporting as well as the U.S. national average for all states (reporting and non-reporting). In 2023, 45% of the locations in PA returned at least one bin compared to a national average of 18%. The highest percentage of locations returning a bin in 2023 amongst states that mandate thermostat returns reporting was Rhode Island (73%).



Figure 22 compares the Pennsylvania and national rates for several analytics. These include: total whole thermostats, bins, and loose switches collected, number of thermostats collected by total locations and per actively participating locations, number of thermostats per bin returned on average, equivalent average, number of mercury thermostat equivalents returned in 2023, and finally percent change in mercury thermostat conversion from 2022 to 2023. The equivalent average is an average of the number of switches in whole thermostats collected in Pennsylvania, and it is used to represent an equivalent number of thermostats from returned loose switches. The thermostat equivalent number includes the total of whole thermostats returned plus the number of thermostats estimated from loose switches. The states displayed are those that mandate thermostat returns reporting and the U.S. average is for all states that return bins (reporting and non-reporting).

#### Categories Average Thermosta Thermosta returned collected per total # % Change per of Average Thermosta over location that Equivalent Equivalent Whole Loose locations Thermosta previous State Thermosta Bins Switches with bins per bin returned Average in 2023 year CA 5,933 318 5,188 8 19 14 1.6145 9,146 3296 7 СТ 1,457 45 9 32 19 1.1764 1,465 -38% IA 559 9 42 24 1.3385 1,520 -16% 1,102 26 7 2,623 36 12 1.1575 2,631 IL. 72 9 396 MA 84 70 63 5,899 588 18 1.1673 6,403 -23% ME 2,538 78 1 13 33 30 1.0445 2,539 1196 MN 5,761 88 1,388 43 65 74 1.1366 6,982 -16% 5 NH 982 29 0 34 24 1.0825 982 2096 NY 2,118 80 404 4 26 12 1.2186 2,450 -4496 39 PA 6,086 119 1,096 18 51 1.3227 6,915 3196 34 RI 1,508 24 3 63 44 1.0889 1,511 -2% 1,690 64 66 11 26 22 1.0964 25% VT 1,750 US Avg 1.382 35 456 12 19 1.3150 1.729 -1%

#### Figure 22 - Comparison of States and US Average Among Several Categories

Figure 23 further compares this state and national data by showing how each state ranked in each of these categories, from highest to lowest. The states compared are those that mandate thermostat returns reporting and the U.S. average is for all states that return bins (reporting and non-reporting).

Figur	Figure 23 - Comparison of States and US Average Among Several Categories, Rankings								
	Whole Thermostats	Bins	Loose Switches	Thermostats returned per total # of locations with bins	Average Thermostats per bin	Average Thermostats collected per location that returned at least one bin in 2023	Equivalent Average	Thermostat Equivalents in 2023	% Change over previous year
1	PA	CA	CA	MN	MA	MN	CA	CA	MT
2	CA	PA	MN	RI	MN	MA	IA	MN	CA
3	MA	MN	PA	MA	RI	RI	PA	PA	PA
4	MN	MA		PA	PA	PA	US Avg	MA	VT
5	IL	NY	IVIA	ME	IA	ME	NY	IL	NH
6	ME	ME	IA	US Avg	US Avg	IA	MT	ME	ME
7	NY	IL	US Avg	VT	IL	NH	CT	NY	IL
8	VT	VT	NY	IA	NH	VT	MA	VT	US Avg
9	RI	СТ	VT	CA	CT	СТ	IL	US Avg	RI
10	СТ	US Avg	IL	СТ	ME	US Avg	MN	IA	IA
11	US Avg	NH		IL	NY	CA	VT	RI	MN
12	IA	IA	RI	NH	VT	MT	RI	СТ	MA
13	NH	RI	ME	NY	CA	IL	NH	NH	CT
14	MT	MT	NH	MT	MT	NY	ME	MT	NY

### **2023 Collections by Brand**

In Pennsylvania, Thermostat Recycling Corporation (TRC) recovered the equivalent of 6,915 mercury thermostats from 6,086 whole mercury thermostats plus 1,096 mercury switches removed from thermostats. A total of 56.7 pounds of mercury was diverted from solid waste. \*Please note the explanation of the converted thermostats or thermostat equivalents below.<sup>1</sup> An example of the mercury ampoule is shown below.



As required by the state statute, a table of thermostat brand holders with their corresponding thermostats, the number of switches and the pounds of mercury recycled is below. It is important to note that there remain non-members whose thermostats the TRC collection program recycles. They are listed in the table as "Non-Member Brands".

<sup>&</sup>lt;sup>1</sup> A mercury thermostat contains a variable amount of mercury ampoules or "switches" attached to the subbase of the thermostat. These glass ampoules often are collected in the recycling container without the intact thermostat attached to them. TRC collects and counts these loose ampoules and recycles them. To derive the converted thermostat or thermostat equivalent, the program takes the following calculations to develop the converted thermostat or thermostat equivalent. First, TRC will count the total whole (intact) thermostats collected in the recycling bins. From these units, there is an intact ampoules count. TRC then takes the intact ampoules divided by the whole (intact) thermostats or otherwise known as the conversion ratio. After the conversion ratio is calculated, TRC will multiple the loose mercury switches by the conversion ratio. Lastly, we add this result to the whole (intact) thermostats to produce the converted thermostats or thermostat equivalents.

Brand Holder	Thermostats	Count Switches	Pounds of Mercury
Bard Manufacturing Corporation			
Burnham Holdings, Inc			
Carrier Corporation	25	71	0.4402
Chromalox			
Climate Master, Inc.			
Crane Company			
Daikin Applied			
Dwyer Instruments			
ecobee			
Emerson Electric Corporation/White			
Rodgers	552	630	3.906
Empire Comfort Systems			
General Electric Corporation	11	28	0.1736
Goodman Global	29	60	0.372
Honeywell Home	5161	6623	41.0626
Hunter Fan Company	1	1	0.0062
ITT Corporation	9	10	0.062
Lennox International Inc.	78	159	0.9858
Marley-Wylain Company			
Nest			
Nortek Global HVAC	13	26	0.1612
Rheem Manufacturing Company	28	55	0.341
Schneider Electric (Invensys Controls)	8	8	0.0496
Taco Comfort Solutions			
TPI Corporation			
Trane Residential Systems	147	346	2.1452
Uponor, Inc.			
W. W. Grainger			
York/Johnson Controls	8	15	0.093
Non-Member Brands			
American Stabilis	2	2	0.0124
PSG Controls	2	3	0.0186
STLPC Corporation (f/k/a Lux Products			
Corporation)	12	13	0.0806
NOM (Manufacturer not identifiable)			
Loose Switches	0	1096	6.7952
Total 6	,086	9,146	56.71

### 2023 Summary of the Program Expenses

Below is a summary of program expenses for the Pennsylvania collection program in 2023. 2023 program expenses (reported in the annual report) are unaudited and are for management purposes only. Prior to submittal of this annual report, the expenses were reviewed by Kellen Company.

Program Component	2022	2023	Difference	
Direct Expense for Marketing & Outreach	\$-	\$ 9,200.00	\$	9,200.00
Incentive/Promotional Payments			\$	-
Legal			\$	-
New Collection Containers			\$	-
Recycling Costs	\$ 18,980.06	\$ 20,106.22	\$	1,126.16
Travel			\$	-
TRC Staff & Administration	\$ 400.00	\$ 725.00	\$	325.00
Total Expenses	\$ 19,380.06	\$ 30,031.22	\$	10,651.16



### 2023 PENNSYLVANIA ANNUAL REPORT

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Questions about this annual report?

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All state specific annual reports are posted on our website at the following weblink:

https://thermostat-recycle.org/program-info/state-reports/

Recycle every mercury thermostat, every time.

## **APPENDICES**

How Mercury Thermostat Waste is Handled



529 14th Street, NW, Suite 1280 | Washington, DC 20045 | thermostat-recycle.org

### HOW MERCURY THERMOSTAT WASTE IS HANDLED

WASTE MERCURY-ADDED THERMOSTAT MANAGEMENT THROUGH VEOLIA ES TECHNICAL SOLUTIONS, LLC.

TRC containers with waste mercury-switch thermostats are received at a fulfillment/ inventory center in Port Washington, Wisconsin (WIR000130591). The facility is owned and operated by Veolia ES Technical Solutions, L.L.C. (Veolia) under contract with TRC.

All recycling containers, including pails and bins are received at the loading dock and sent to the TRC inventory room. The container 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 containers are returned to the location that sent it in with a new prepaid address label within 3 weeks 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 thermostats and any loose bulbs collected from the containers are consolidated 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 captured and vented when the drum is opened.

The 55-gallon drum is then shipped to Veolia's mercury recovery facility (WID988566543) for final processing of the mercury ampules (switches). Veolia Environmental Services meets or exceeds all local, state, federal and EPA regulations for the management of the product.

The containers are returned from the storage area to the mercury recovery processing area to have the mercury bulbs removed from the plastic housing. Universal Waste Regulations require the recycling and disposal of waste within 12 months of acceptance at the processing facility.

Small quantities of thermostats are removed from the container, which is then closed again. The bulbs are removed from the thermostats and placed into processing vessel at the work station. Once the processing vessel is full, the vessel is loaded into the mercury recovery retort oven.

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 inventory

and processing areas are equipped with special mercury vacuum cleaners and the work area is vacuumed at the end of the work day to ensure that any spillage is cleaned up and not left to evaporate.

Veolia meets or exceeds all local, state, federal and EPA regulations for the management of the product. The mercury recovery facility and process are permitted by the Wisconsin Department of Natural Resources. Veolia's approvals for mercury recovery/recycling include:

- EPA identification WID988566543
- Hazardous Waste Storage License #6008
- Hazardous Waste Treatment License (Mercury Recovery Operations) #4585
- Air Operation Permit #246076050-S01
- Storm Water General Permit #WI-S067857-4

In addition to the regulatory permits, both Veolia Port Washington facilities have developed and maintain management systems in accordance with ISO 14001-2004, OHSAS 18001-2007, and Responsible Recycling (R2:2013) Practice. All persons who handle mercury thermostats as part of the TRC operation receive training in the handling of Hazardous Waste and Universal Waste.

The mercury containing ampules are retorted at Veolia's Port Washington Mineral Springs facility. The mercury is removed during the retort process. The post retort debris consists of broken glass ampules. The debris is tested for residual mercury to document the removal of the mercury to levels below the US EPA Land Disposal Restriction (LDR) levels. The debris is then disposal of as a non-hazardous solid waste at Advanced Disposal Glacier Ridge Landfill, LLC in Horicon, Wisconsin.