



October 20, 2014

Pauline Batarseh, Chief
Policy Implementation Branch
Policy and Program Support Division
Hazardous Waste Management Program
1001 I Street
Sacramento, California 95812-0806

Re: Summary of Violations dated July 3, 2014

Dear Ms. Batarseh:

This letter is in response to the Summary of Violations dated July 3, 2014 ("SOV") issued by the Department of Toxic Substances Control ("DTSC") in regards to *Thermostat Recycling Corporation's 2013 Annual Report for California* (the "2013 Annual Report") submitted by the Thermostat Recycling Corporation ("TRC") on behalf of Carrier Corporation and the other TRC member companies.

Thank you for joining with our California representatives on the October 8th conference call to discuss the issues raised in the SOV. We believe that conference call, along with the conference call on July 30th with a broader group of TRC members, represents an important early step toward addressing the issues cited by the DTSC with regard to collection rate performance for calendar year 2013, as well as some of the concerns that have been raised by Carrier and other TRC members. Those concerns include, among others, the lack of a reliable estimate of the total universe of mercury-added thermostats, and the inability of the manufacturer to control their removal from buildings

Carrier appreciates the DTSC's detailed evaluation of the 2013 Annual Report and analysis of the TRC's proposed program enhancements. We have studied the DTSC's Review of the 2013 Annual Report and are prepared to discuss the TRC's proposals and the DTSC response either individually or in conjunction with the other TRC members.

Carrier Corporation is not opposed to any reasonable program that sets realistic and attainable objectives for the collection and recycling of out-of-service mercury-added thermostats. We are open to any and all ideas that may lead to workable solutions. Carrier stands ready to work together with the DTSC and the other TRC member companies toward that end.

Sincerely,

William F. Walfer
Fellow