

Pilot Project Plan for the Collection of Mercury Added Thermostats in California

Presented to
California Department
of Toxic Substances Control (DTSC)

Submitted by
Thermostat Recycling Corporation (TRC)

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Introduction

This document describes a recommended approach to conducting mercury-added thermostat (to be referred to as mercury thermostat) recycling pilot projects aimed at increasing the number of mercury thermostats via targeted pilot project tactics. It explains how the outreach process combines with the Pilot Project Plan, and suggests an integrated approach designed to reach the 14 potential program participants identified in the California Department of Toxic Substance Control (DTSC) Consent Order effective February 10, 2016.

In order to build its suggested strategy, SGA developed the outreach and pilot plans to meet the requirements of the DTSC Consent Order. Based upon the deadlines of the consent order, the steps shown in Figure A explain how the plans will be carried out. Please note that the timeframe set by the Consent Order requires that the outreach and pilot project plans be developed concurrently, despite pilot planning being dependent to some extent upon the results of the outreach findings.

(NOTE: For best understanding of the overall project, read the Outreach Plan first, followed by the Pilot Project Plan.)

Approach to Overall Program Design

The overriding goal of this Program is to create a systematic approach for finding effective ways to educate and move to action multiple targeted audiences to recycle mercury thermostats. Part of this effort is to increase ease of access to proper disposal by working to develop additional collection sites (reduce a barrier to recycling) and part of this is to test motivations (monetary incentives and non-monetary incentives) that will influence audiences to take action.

Building upon the information learned and ideas suggested in the Outreach Plan, this Pilot Project Plan is guided by a two-pronged approach: 1) a broad effort by seeking to engage potential program participants at the state, regional, and county associations/organizations level, with the goals of increasing the number of collection sites and 2) a concentrated effort by seeking to reach the full range of potential program participants at a concentrated city level – recommended as the City of San Bernardino, with the goal of collecting as many mercury thermostats as possible within a defined area. This approach hopes to yield insights for use in other cities across California by showing the impact of overlapping, complementary efforts.

As part of the broad effort at the state, regional, and county levels, the Pilot Project Plan will place additional emphasis on seeking to increase collection sites and bin placement at HHW centers, as well as seeking to increase bin placement with large contractors (HVAC, General, and Demolition.)

Purpose of the Pilot Project Plan

The purpose of the Pilot Project Plan is to lay out the strategy and design of the pilot project portion of the overall mercury thermostat collection program, to show how the Outreach Plan will be conducted in tandem with the Pilot Project Plan, and to outline how the Pilot Project Plan addresses the DTSC Consent Order Exhibit B.

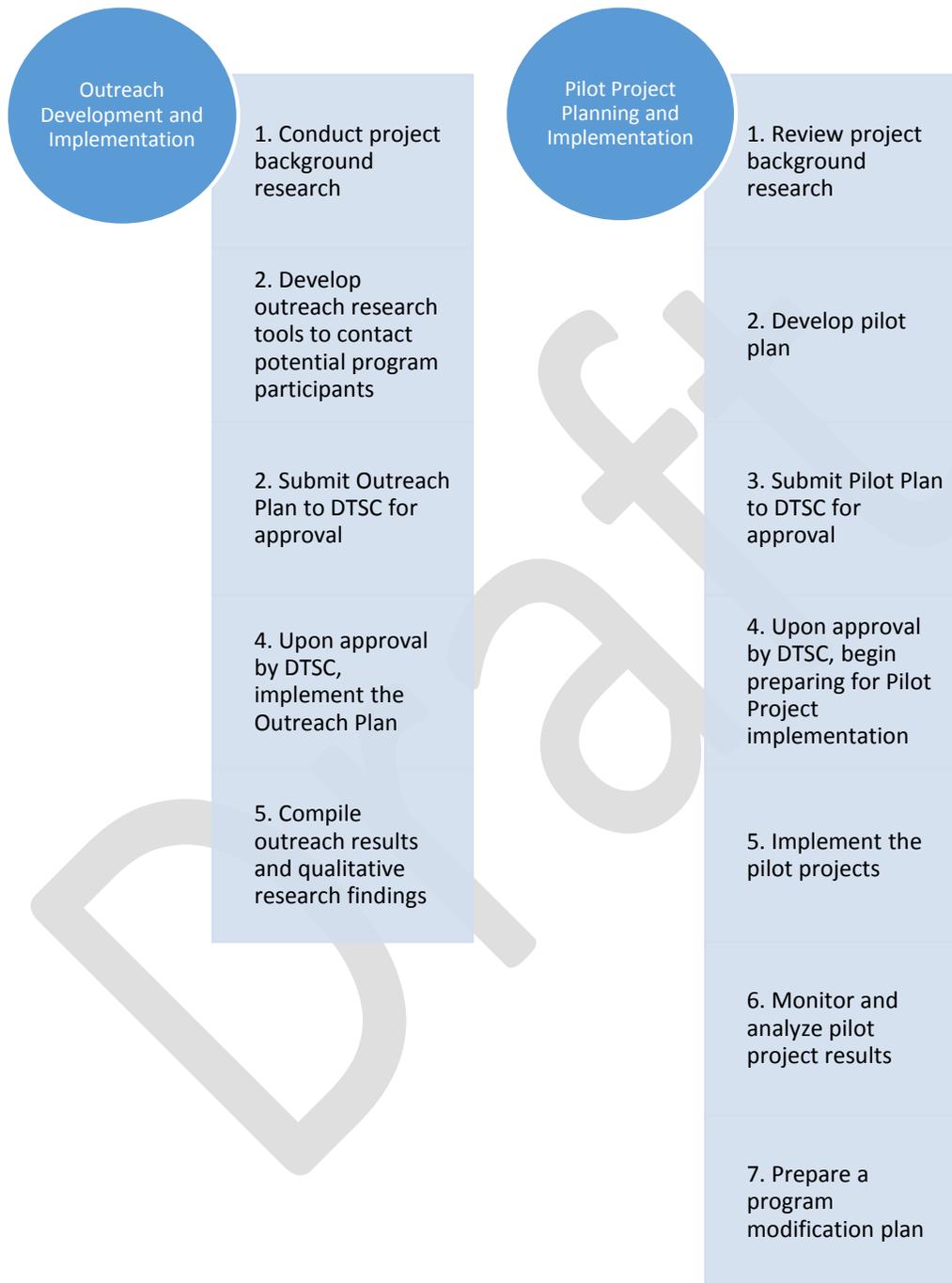
The DTSC Consent Order Exhibit B calls out the details of the Pilot Project Plan; said parameters and requirements inform the Pilot Project Plan from start to finish beginning with the Goals of the Pilot Project Plan and concluding with the Proposed Schedule for Implementation.

Though outreach development and implementation are referenced, for the purposes of this Pilot Project Plan, only pilot project development and implementation sequencing (as shown on the right side in Figure A below) will be specifically addressed in this report.

NOTE: The timeframe set by the Consent Order requires that the outreach and pilot project plans be developed concurrently, despite pilot planning's dependence, typically, upon the outreach results. In addition, while the Consent Order neither requires nor provides time for standard levels of market research, SGA has included a parallel step where qualitative research (i.e., listening to the audience to understand their perspectives) will be gathered, when possible, to refine outreach as data is gathered.

Figure A on the next page shows the outreach and pilot project plan sequencing. For full details about the Outreach Plan process, see the "Outreach Plan for the Collecting of Mercury-Added Thermostats in California."

Figure A: Outreach and Pilot Project Plan Sequencing



Pilot Project Planning and Implementation

Based upon the DTSC Consent Order effective February 10, 2016, the goals of pilot project planning and implementation for this project are to:

1. develop a pilot project plan
2. use DTSC recommendations to adjust the pilot project plan
3. implement the DTSC-approved pilot project plan, and
4. gather results to inform the program modification plan.

Pilot Planning and Implementation Activities

With these goals in mind and the timeframe afforded by the DTSC consent order, the following activities were created:

1. Conduct research on literature and programs
 - Review research studies, reports, and programs to find out what types of efforts and messaging have been conducted related to mercury thermostat collection and recycling in California and other states
2. Develop Pilot Project Plan
 - Consider partnership pathways, messaging, events, signage, written materials, social media as well as other vehicles of communication that had worked in environmental behavior-influencing campaigns in the past
 - Develop messaging approaches for materials for the pilot projects
3. Submit Pilot Project Plan to DTSC for approval
 - Present pilot plan to DTSC
 - Incorporate DTSC recommendations into the pilot project planning process
4. Upon approval by DTSC, begin preparing for Pilot Project implementation
 - Coordinate logistics for implementation of the pilots
 - Reach out to partners to coordinate logistics for carrying out pilot projects
 - Refine messaging
 - Prepare collateral
 - Coordinate with TRC for anticipated delivery of collection bins and/or existing collateral materials
5. Implement the pilot projects
 - Maintain clear, consistent, and regular contact with pilot project partners and collection sites
 - Use tactics in the pilot project plan to achieve the plan goals as defined in the DTSC consent order
6. Monitor and analyze pilot project results
 - Via phone, in-person, and online, track pilot project progress and record it using the pilot project assessment tools

7. Prepare a Program Modification Plan
 - Analyze the pilot project assessment tool results
 - Write a summary of results
 - Prepare the program modification plan to include recommendations for continuing the pilot projects that yield significant positive results and discontinuing those that did not yield notable: 1) increase in mercury thermostat collection, 2) increase in collection bin placement, and 3) results from online awareness tracking.

Scope of Pilot Project Plan

The scope of the Pilot Project Plan includes focusing upon potential program participants as listed in the DTSC Consent Order Exhibit A and identifying locations.

List of Potential Program Participants

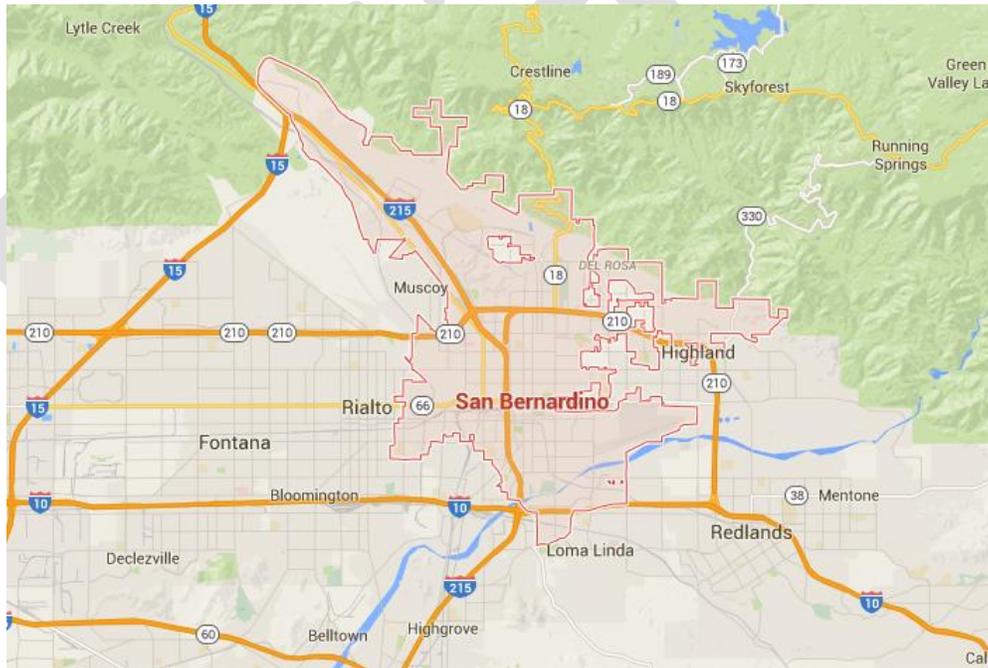
The 14 potential program participants are listed in Exhibit A of the consent order as:

1. Household Hazardous Waste Collection Facilities
2. HVAC Contractors
3. Demolition Contractors
4. General Contractors
5. Local building departments
6. Utility companies
7. School districts
8. Property management companies of multi-family housing developments
9. Property management companies of commercial/industrial properties
10. Hotel/motel managers and maintenance companies
11. Consumers
12. Retailers
13. Universities and colleges
14. Any other group who may handle mercury-added thermostats

Location

Based upon pre-outreach research conducted, the City of San Bernardino is recommended as the preferred pilot project location. We recommend focusing pilots around the City of San Bernardino as a location that is most likely to have a greater than average number of mercury thermostats still in use (see the “Outreach Plan for Collecting Mercury Thermostats in California” for full explanation of the location selection criteria, data sources used and details of location comparisons).

Shown below is a map of the City of San Bernardino in relation to Los Angeles, followed by a map of the City of San Bernardino with its immediately-surrounding towns/cities.



To drive partnerships across a broader geographic area, potential program participants will be contacted and engaged through regional, county, and state associations and organizations. See the “Outreach Plan for the Collecting of Mercury-Added Thermostats in California.”

Goals of the Pilot Project Plan

The Pilot Project Plan goals are underpinned by the wording of the DTSC Consent Order as described in its Exhibit B, sections B-1.4.1 and B-1.4.2.

DTSC Consent Order Exhibit B

Exhibit B has two sections encompassing the goals of the Pilot Project Plan. They are:

Respondents' Plan for Compliance B-1.4.1

Within ninety (90) [days] of the Effective Date of the Order, Respondents shall develop a Pilot Project Plan that includes a sufficient variety and number of pilot projects designed to assess the effectiveness of the use of monetary and other incentives to increase Program participation and the number of mercury-added thermostats collected.

The Plan shall include a reasonable assortment of pilot projects that assess the use of monetary and nonmonetary incentives of different values with different program participants, and may differentiate the timing of the receipt of the incentive (immediate versus delayed). Examples of possible pilot projects include: (a) a cash payment or purchase price discount for large HVAC contractors eligible to receive a TRC collection box (those with seven or more technicians); (b) a cash payment or purchase price discount for consumers on any item purchased at the retail location for every mercury-added thermostat returned; or (c) a cash payment for each mercury-added thermostat submitted to household hazardous waste collection facilities.

The Pilot Project Plan shall be informed by the results of Respondents' implementation of its Outreach Plan to the extent practicable.

The Pilot Project Plan shall also include a proposed schedule for implementation of the pilot projects described therein which shall begin no later than sixty (60) days after submittal of the draft plan to the Department. The pilots specified in this subsection shall continue for a minimum of one year, to take into account any seasonal changes associated with mercury-added thermostat replacements.

Respondents' Plan for Compliance B-1.4.2

No later than sixty (60) days after submittal of the draft Pilot Project Plan to the Department, or upon approval of the plan by the Department, whichever occurs first, unless directed otherwise by the Department, Respondents shall implement the Pilot Project Plan in accordance with its provisions and schedule.

Within ninety (90) days of the completion of all activities described in the approved Pilot Project Plan, the Respondents shall submit a report describing the results of each of the pilot projects undertaken pursuant to the Pilot Project Plan and indicating which, if any, of the pilot projects will continue in conjunction with the Program Modifications implemented under Paragraph B-1.5.

Strategy

In order to provide a strategy for pilot project development at this pre-implementation outreach stage, SGA had to make assumptions, formulate objectives, and think toward a sustainable pilot design.

Assumptions

We determined that in order for the pilot projects to succeed, they had to be governed by the following assumptions:

- A significant way to increase collection of mercury thermostats is to increase collection sites
- A majority of consumers, and many maintenance and contractor personnel, do not know that thermostats may be universal waste requiring proper recycling and that if they were exposed to multiple information sources, they would undertake requested recycling effort
- Finding ways to provide collection location lists or access a collection site locator (such as through the TRC website location finder tool) will result in increased collections
- Managers of several of the potential program participants will be amenable to 1) installing collection bins, 2) allowing their employees to be educated about mercury thermostat recycling, and 3) acting as conduits for educational and awareness information via print, online, or in-person delivery to their potential thermostat-handling employees and/or customers
- Incentives offered, monetary and/or non-monetary, are adequate to influence behavior

Objectives

Based upon the consent order, the Pilot Project Plan is one: “that includes a sufficient variety and number of pilot projects designed to assess the effectiveness of the use of monetary and other incentives to increase Program participation and the number of mercury-added thermostats collected.”

Objective 1: Suggest a variety of pilot projects designed to assess the effectiveness of the use of monetary and non-monetary incentives to increase program participation

Objective 2: Suggest a variety of pilot projects designed to educate and inform the potential program participants to increase the number of mercury-added thermostats collected

Objective 3: Suggest a variety of pilot projects designed to assess the effectiveness of the use of monetary and non-monetary incentives to increase the number of mercury-added thermostats collected

Objective 4: Suggest a variety of pilot projects designed to assess the effectiveness of the creation of new collection sites to increase the number of mercury-added thermostats collected

Objective 5: Provide a proposed schedule for implementation of the pilot projects described therein which shall begin no later than sixty (60) days after submittal of the draft plan to the Department.

Objective 6: Implement the Pilot Project Plan in accordance with its provisions and schedule.

Objective 7: Submit a report describing the results of each of the pilot projects undertaken pursuant to the Pilot Project Plan and indicating which, if any, of the pilot projects will continue in conjunction with

the Program Modifications implemented under Paragraph B-1.5.

NOTE: Achievement of the above objectives will be measured as shown in the section, “Pilot Project Metrics,” later in this document.

Strategic Components

Based upon the objectives outline above, there are four components to the pilot project plan strategy: 1) Partner (as a collection site or as an educational conduit,) 2) Inform and Educate, 3) Incentivize, and 4) Increase Ease/Convenience of recycling. The table, “Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans” shows how the strategy ties to tactics.

Before reviewing the tactical breakdown, however, it is important to consider the Consent Order Tactic-related Specifics and how they drive pilot project planning.

Consent Order Tactic-related Specifics

The DTSC Consent Order requires: 1) using monetary and non-monetary incentives, 2) increasing collection sites, and 3) increasing mercury thermostats collected.

Monetary Incentives

As detailed in the table, “Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans,” several monetary incentives will be used to drive the pilot projects.

1. A \$5 cash mail-in coupon (delayed) versus a \$5 in-store credit or gift card (immediate) will be modeled and tested. These are based on two mercury thermostat collection programs ongoing in Maine and Vermont.
2. An (immediate) financial incentive to retailers is the pilot project’s purchase of home improvement gift cards (or in-store credits) as incentives to individuals who bring in mercury thermostats for recycling as mentioned in #1 above. Additionally, the creation of collection sites at retail stores may drive customers to stores resulting in consumer purchases exceeding the \$5 in-store credit or gift card.
3. The \$100 per 40- mercury-thermostat bin incentive (delayed) to large Contractors (HVAC, general, and demolition) is designed to increase bin placement and collection sites.
4. The plan calls for in-store advertising, another financial incentive for retailers.
5. Provision of free bins to each new location upon partnership or collection site signup is an immediate minimum \$25 cash value incentive to increase collection sites.

Non-monetary Incentives

1. New partners who sign up for a bin or who agree to post or promote a link to the microsite will be included on the microsite Recycling Partners web page.
2. Partners will be provided with positive public relations via inclusion in blog posts and/or e-newsletter or media relations articles to contribute to their positive community image.
3. Audiences may also be motivated by messaging regarding health/safety, community, and social norms.

- Partners may use their participation as part of their internal community service-social action imperatives.

Collection Sites

Several of the potential program participants represent opportunities for increasing the number of collection sites. Adding collection sites is viewed as the best way to increase convenience for potential recyclers. The most likely opportunities for establishment of new collection sites is anticipated to occur at retailers, HHW centers, and large contractors, but multiple potential program participants will be evaluated and approached if bin placement is deemed suitable.

Using the Outreach Plan (see the “Outreach Plan for the Collection of Mercury Thermostats in California”) as a starting point and keeping in mind the four strategic components above to reach each group listed in DTSC Consent Order Exhibit A List of Potential Program Participants, the following tactical approach is suggested as shown below in Table I: Strategy, Tactics, and Incentives by Potential Program Participant.

NOTE: While a broad variety of contacts, channels, and educational materials, were considered including, but not limited to social media/Facebook, video, mass media advertising/PSAs, two key items guided the choices below: 1) the timeframe for carrying out the Pilot Project Plan, and 2) social science research regarding tactical approaches to influencing and changing behaviors. Based on these two criteria, our research pointed to direct and individualized communication which has a greater chance of changing behavior. Our literature research included two key examples of the influence of this approach including: attentional focus consequent of in-person interaction facilitates memorization of information¹, and face-to-face conversation is important in fostering relationships and influencing understanding in a targeted audience, especially in shorter timeframes.²

Tactics

The specific activities of the Pilot Project Plan are its tactics as shown below. These are the building blocks of the pilot projects and are shown below in the table “Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans.”

¹ Fullwood C, Doherty-Sneddon G (March 2006). "Effect of gazing at the camera during a video link on recall". *Appl Ergon* 37 (2): 167–75. doi:10.1016/j.apergo.2005.05.003.]

² Arvey, Richard D. (2009) “Why Face-to-Face Business Meetings Matter.” Business School, National University of Singapore

Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans

Table: Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans							
	OUTREACH PLAN			PILOT PROJECT PLAN			
<i>Potential Program Participant (Target Audience)</i>	<i>Strategic Component</i>	<i>Tactics</i>	<i>Strategic Component</i>	<i>Tactics</i>	<i>Monetary or Non-monetary Incentives</i>	<i>Pilot Project Metrics</i>	
Household Hazardous Waste Collection Facilities	Contact Educate Engage Materials Bins	<ul style="list-style-type: none"> • Call and/or arrange meetings with HHW managers • Attend one or more HHW Information Exchange meetings to establish and/strengthen connection • Discuss partnerships with the goal of bin placement and proper thermostat sorting and shipment to TRC • Solicit qualitative data to help improve pilot projects 	Partner	<ul style="list-style-type: none"> • Participate in regional and Statewide HHW information exchanges with local program managers • Work with local program managers to promote and include TRC bin collection of mercury thermostats • Gain inclusion in HHW outreach materials (e.g., provide articles for newsletters or provide an insert informational brochure to be mailed to residents) • Present with a guest NGO speaker at a regional meeting to get news out about the recycling program to local program managers • Create a microsite with information for HHW managers to obtain a TRC collection bin • Provide mail in rebate 	<ul style="list-style-type: none"> • Free collection bins • No-cost disposal of mercury thermostats 	<ol style="list-style-type: none"> 1. New collection sites established 2. Bins placed 3. Quantity of thermostats collected 4. State / regional / county / city meetings attended as educational speakers or presenters 5. Quantity of brochures/materials distributed 6. Number of mail-in rebates redeemed 7. Microsite hits 	

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HVAC Contractors	Contact Educate Engage Materials [Place] Bins	<ul style="list-style-type: none"> Contact HVAC contractors through messaging the CSLB, local chapters of trade associations, microsite links, etc. Solicit qualitative data to help improve pilot projects If large enough provide free bin 	Partner (if large enough to have a bin) Educate Incent Increase Ease Educate Incent Increase Ease	<ul style="list-style-type: none"> Produce informational flyer for distribution to technicians about recycling mercury thermostats in English and Spanish Seek to incorporate an article in newsletter to HVAC contractors from California State Licensing Board (CSLB) Conduct an incentive program with mail-in rebate from HHW or in-store credit or gift card from retailers Provide in-store informational brochures, shelf-talkers, or posters at wholesalers/distributors Create microsite with HVAC/General Contractor page in English and Spanish Work with DTSC about making contact with the Contractors State Licensing Board to investigate the establishment of a question on the State licensing exam regarding how to identify mercury-added thermostats and to learn of proper recycling 	<ul style="list-style-type: none"> Mail-in rebate (from HHW) or in-store credit or gift card (from retailers) If partner: free TRC recycling bins for each partnered location \$100 mailed rebate for each bin containing at least 40 mercury thermostats (large contractors) 	<ol style="list-style-type: none"> HVAC contractors contacted to educate, and engage- list to include qualitative research data Quantity of brochures/materials distributed Trade and other associations groups contacted to educate and engage- list to include qualitative research data Quantity of brochures/materials distributed Microsite hits

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Demolition Contractors	Contact Educate Engage Materials [Place] Bins	<ul style="list-style-type: none"> • Contact demolition contractors via phone, associations, and website to tell them about the recycling program • Solicit qualitative data to help improve pilot projects • If large enough provide free bin 	Partner (if large enough to have a bin) Educate Incent Increase Ease	<ul style="list-style-type: none"> • Contact environmental services hazardous waste subcontractors Work to get a link from the demolition contractors association onto the microsite to drive recycling to wholesaler/distributors and/or retail collection sites • Work with DTSC about making contact with the Contractors State Licensing Board to investigate the establishment of a question on the State licensing exam regarding how to identify mercury-added thermostats and to learn of proper recycling 	<ul style="list-style-type: none"> • Mention the company's name on the microsite's participating recyclers webpage or on a TRC web page • If partner: free TRC recycling bins for each partnered location • \$100 mailed rebate for each bin containing at least 40 mercury thermostats 	<ol style="list-style-type: none"> 1. Demolition contractors contacted to educate and engage - list to include qualitative research data 2. Trade and other associations groups contacted to educate and engage - list to include qualitative research data 3. Quantity of brochures/materials distributed 4. Microsite hits
General Contractors	Contact Educate Engage Materials Bins	<ul style="list-style-type: none"> • Contact contractors through messaging the CSLB, local trade associations, microsite links, etc. • Solicit qualitative data to help improve pilot projects 	Partner (if large enough to have a bin) Educate Incent Increase Ease	<ul style="list-style-type: none"> • Brochures to educate students • Produce informational brochure for distribution to technicians about recycling in English and Spanish • Seek to incorporate an article in newsletter to general contractors from CSLB 	<ul style="list-style-type: none"> • Mail-in rebate (from HHW) or in-store credit or gift card (from retailers) 	<ol style="list-style-type: none"> 1. Bins placed (for those accepting bins)

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	OUTREACH PLAN		PILOT PROJECT PLAN			
Potential Program Participant (Target Audience)	Strategic Component	Tactics	Strategic Component	Tactics	Monetary or Non-monetary Incentives	Pilot Project Metrics
	Contact Educate Engage [Produce] Materials [Place] Bins	<ul style="list-style-type: none"> If large enough provide free bin 	Partner Educate Incent Increase Ease	<ul style="list-style-type: none"> Conduct an incentive program with mail-in rebate from HHW or in-store credit or gift card from retailers Provide in-store informational brochures, shelf-talkers, or posters at wholesalers/distributors Create microsite with HVAC/General Contractor page in English and Spanish Work with DTSC about making contact with the Contractors State Licensing Board to investigate the establishment of a question on the State licensing exam regarding how to identify mercury-added thermostats and to learn of proper recycling 	<ul style="list-style-type: none"> If partner: free TRC recycling bins for each partnered location \$100 mailed rebate for each bin containing at least 40 mercury thermostats (large contractors) 	<ol style="list-style-type: none"> General Contractors contacted to educate and engage - list to include qualitative research data Trade and other associations groups contacted to educate and engage - list to include qualitative research data Quantity of brochures/materials distributed microsite hits

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	<i>OUTREACH PLAN</i>		<i>PILOT PROJECT PLAN</i>			
<i>Potential Program Participant (Target Audience)</i>	<i>Strategic Component</i>	<i>Tactics</i>	<i>Strategic Component</i>	<i>Tactics</i>	<i>Monetary or Non-monetary Incentives</i>	<i>Pilot Project Metrics</i>
Local Building Departments	Contact Educate Engage [Produce] Materials [Place] Bins	<ul style="list-style-type: none"> Contact the local building department; solicit names of key officials (in permits, training, etc.) that can disseminate informational brochures Solicit qualitative data to help improve pilot projects 	Partner Educate Incent	<ul style="list-style-type: none"> Post educational information at public-facing counters Distribute brochures at local agency where HVAC unit permits are issued Enlist the aid of HHW or other related agencies (for introductions) to gain access to the local building department to provide informational brochures to its inspectors Promote contractor microsite for proper recycling methods and link to TRC collection site locator 	<ul style="list-style-type: none"> Mention the department's name on the microsite's participating recyclers webpage or on a TRC web page 	<ol style="list-style-type: none"> Building department officials contacted to educate and engage - list to include qualitative research data Quantity of brochures/materials distributed
Utility Companies	Contact Educate Engage Materials	<ul style="list-style-type: none"> Enlist the aid of DTSC to connect with utility company management in order to disseminate mercury thermostat recycling information Solicit qualitative data to help improve pilot projects 	Partner Educate Incent	<ul style="list-style-type: none"> Work with utility company on energy savings approach to include mercury thermostat recycling information Have utility company energy savings web page to link to the TRC site to encourage proper disposal when purchasing a new thermostat Get an article published in the utility company e-newsletter or blog Enlist the aid of DTSC to connect with utility company management in order to disseminate mercury thermostat recycling information 	<ul style="list-style-type: none"> Company's name on the microsite's participating recycling partners webpage or on a TRC page 	<ol style="list-style-type: none"> Utility company officials contacted to educate and engage - list to include qualitative research data Website links to TRC site gained E-newsletter article/blog post accepted

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School Districts	Contact Educate Engage Materials [Place] Bins	<ul style="list-style-type: none"> Contact the school district office(s); solicit names of key officials (supervisors, trainers) who can disseminate informational brochures and microsite information to maintenance personnel and/or contracted HVAC company(ies) Solicit qualitative data to help improve pilot projects 	Partner Educate Incent	<ul style="list-style-type: none"> Create an informational brochure or poster to educate maintenance personnel on proper mercury thermostat recycling Contact unions as conduit for information regarding thermostat-handling or supervising service workers about the recycling program 	<ul style="list-style-type: none"> Mention the district's name on the microsite's participating recycling partners webpage 	<ol style="list-style-type: none"> School district officials contacted to educate and engage - list to include qualitative research data E-newsletter article/blog post accepted

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Property Management Companies of Multi-Family Housing Developments	Contact Educate Engage [Produce] Materials [Place] Bins	<ul style="list-style-type: none"> Contact local property management companies to find the gatekeepers to their maintenance personnel and/or HVAC contractors for the purpose of: educating them about the recycling program, and informing them about collection sites Solicit qualitative data to help improve pilot projects 	Partner Educate Incent	<ul style="list-style-type: none"> Create an informational brochure or poster to educate maintenance personnel on proper mercury thermostat recycling Work with trade associations to provide blog post or e-newsletter article regarding recycling program (e.g., National Association of Residential Property Managers) 	<ul style="list-style-type: none"> Mention the company's name on the microsite's participating recycling partners webpage 	<ol style="list-style-type: none"> Property Management Companies contacted to educate and engage - list to include qualitative research data Quantity of brochures/materials distributed Trade and other associations groups contacted to educate and engage - list to include qualitative research data E-newsletter article/blog post accepted

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Property Management Companies of Commercial / Industrial Properties	Contact Educate Engage [Produce] Materials [Place] Bins	<ul style="list-style-type: none"> Contact local property management companies to find the gatekeepers to their maintenance personnel and/or HVAC contractors for the purpose of: educating them about the recycling program, and informing them about collection sites Solicit qualitative data to help improve pilot projects 	Educate Incent	<ul style="list-style-type: none"> Create an informational brochure or poster to educate maintenance personnel on proper mercury thermostat recycling Work with trade associations to provide blog post or e-newsletter article regarding recycling program (e.g., Property Management Association - commercial properties) Contact California-based commercial/industrial property management companies and trade associations about if a link to the microsite may be included on their websites (perhaps where other green efforts/recycling efforts are listed) 	<ul style="list-style-type: none"> Mention the company's name on the microsite's participating recycling partners webpage 	<ol style="list-style-type: none"> Property Management Companies contacted to educate and engage - list to include qualitative research data Quantity of brochures/materials distributed Trade and other associations groups contacted to educate and engage - list to include qualitative research data E-newsletter article/blog post accepted

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	OUTREACH PLAN		PILOT PROJECT PLAN			
Potential Program Participant (Target Audience)	Strategic Component	Tactics	Strategic Component	Tactics	Monetary or Non-monetary Incentives	Pilot Project Metrics
Hotel / Motel Managers and Maintenance Companies	Contact Educate Engage [Produce] Materials [Place] Bins	<ul style="list-style-type: none"> Contact hotel and motel managers to partner in providing information to their maintenance personnel and/or HVAC contractors Solicit qualitative data to help improve pilot projects 	Educate Incent	<ul style="list-style-type: none"> Create an informational brochure or poster to educate maintenance personnel on proper mercury thermostat recycling Contact trade associations such as the California Hotel and Lodging Association or the California Green Business Association- hotel section to get them info or an article or blog post to include in publications and on their website 	<ul style="list-style-type: none"> Mention the company's name on the microsite's participating recycling partners webpage 	<ol style="list-style-type: none"> Hotel and motel managers and maintenance companies contacted to educate and engage - list to include qualitative research data Quantity of brochures/materials distributed Trade and other associations groups contacted to educate and engage - list to include qualitative research data E-newsletter article/blog post accepted

Table: Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans

	OUTREACH PLAN		PILOT PROJECT PLAN			
Potential Program Participant (Target Audience)	Strategic Component	Tactics	Strategic Component	Tactics	Monetary or Non-monetary Incentives	Pilot Project Metrics
Consumers	Contact Educate Engage Materials [Place] Bins		Partner Educate Incent Increase Ease			
Consumers	Contact Educate Engage Materials	<ul style="list-style-type: none"> Through retail locations, contact consumers through use of informational materials including signage, in-store notification and/or advertising, etc. 	Educate Incent Increase Ease	<ul style="list-style-type: none"> Develop shelf-talker posters with tear-off informational sheets or rebate for point-of-collection in English and Spanish at retailers and big box stores (e.g., Home Depot, Lowe’s, etc.) Use google ads to drive consumers to retail collection sites based on key search terms 	<ul style="list-style-type: none"> Mail-in rebate (from HHW) or in-store credit or gift card (from retailers) 	<ol style="list-style-type: none"> Through retailers and HHW centers, number of thermostats collected Quantity of shelf-talker tear-off sheets taken TRC site hits from California
Retailers	Contact Educate Engage Materials Bins	<ul style="list-style-type: none"> Contact corporate entities to obtain access to location managers with the authority to establish collections sites and decide upon in-store promotions and events Solicit qualitative data to help improve pilot projects 	Partner Educate Incent Increase Ease	<ul style="list-style-type: none"> Partner with home improvement stores to enable in-store messaging and recycling sites Visit existing and sign up new retailer (home improvement stores that carry thermostats) facilities for the TRC bin program Develop shelf-talkers with tear-off informational sheets for point-of-collection in English and Spanish Conduct a “Mercury Thermostat or Thermostat Roundup” event or similar to collect thermostats and hand-out instant rebate or gift card In-store flyer ad Add participating retail partner links to the microsite 	<ul style="list-style-type: none"> TRC purchase of gift cards to fund recycling incentives Payment for in-store advertising in ad flyer, etc. Roundup event drives customers to store Free TRC recycling bins for each partnered location 	<ol style="list-style-type: none"> Number of collection sites Number of bins placed Number of thermostats collected Number of in-store incentives redeemed Website links to microsite gained Quantity of shelf-talker tear-off sheets taken

Table: Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans

	OUTREACH PLAN		PILOT PROJECT PLAN			
Potential Program Participant (Target Audience)	Strategic Component	Tactics	Strategic Component	Tactics	Monetary or Non-monetary Incentives	Pilot Project Metrics
	Contact Educate Engage [Produce] Materials [Place] Bins		Partner Educate Incent Increase Ease			
				<ul style="list-style-type: none"> • Use google ads to promote events and micro-site and help drive traffic directly to TRC collection site locator 	<ul style="list-style-type: none"> • Mention the home improvement chain name on the microsite's participating recyclers webpage 	
Universities and Colleges	Contact Educate Engage Materials	<ul style="list-style-type: none"> • Call institutional facility managers and find out how to disseminate information to maintenance personnel and/or HVAC contractor charged with thermostat replacement • Solicit qualitative data to help improve pilot projects 	Educate Incent	<ul style="list-style-type: none"> • Create informational brochure for internal maintenance personnel • Contact unions as conduit for information regarding thermostat-handling or supervising service workers about the recycling program 	<ul style="list-style-type: none"> • Mention the institution's name on the microsite's participating recyclers webpage 	<ol style="list-style-type: none"> 1. University and college facilities managers contacted to educate and engage - list to include qualitative research data 2. Meetings w/unions and/or maintenance personnel to educate and create awareness 3. Quantity of brochures/materials distributed

Table: Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans

	OUTREACH PLAN		PILOT PROJECT PLAN			
Potential Program Participant (Target Audience)	Strategic Component	Tactics	Strategic Component	Tactics	Monetary or Non-monetary Incentives	Pilot Project Metrics
Any other group who may handle mercury-added thermostats	Contact Educate Engage Materials [Place] Bins	<ul style="list-style-type: none"> Contact state, regional, and city associations and groups for each "Other" category shown Gather qualitative data that shows how "Other" groups may participate in the pilot project implementation 	Partner Educate Incent	<p><i>Unions</i></p> <ul style="list-style-type: none"> Contact unions regarding distribution of information to their maintenance members at universities, colleges or schools; discuss health and safety issues regarding proper thermostat-handling or supervising service workers about the recycling program <p><i>NGOs</i></p> <ul style="list-style-type: none"> Contact NGOs as partners in disseminating information about the recycling program to local HHW programs Work with NGOs as partners for roundup day event and promoting the recycling of mercury thermostats 	<ul style="list-style-type: none"> Mention the institution's name on the microsite's participating recyclers webpage or TRC webpage 	<ol style="list-style-type: none"> Trade and other associations groups contacted to educate and engage - list to include qualitative research data Quantity of brochures/materials distributed

Design Sustainability

Because those pilot projects deemed most likely to yield mercury thermostats are to continue for one year, sustainability of the pilot projects is fundamental to the concept of this pilot project plan. As mentioned earlier, the pilot projects rely heavily upon personal outreach and follow-up. Examples include in-the-field tactics such as the retailer Mercury Thermostat Roundup event, visits to HHW centers, provision of educational (i.e. NGO) speakers at partners' training or information sessions/meetings. Additionally, in reaching out to regional and state associations, and unions specific to the potential program participants, we hope to tap into ongoing channels to continue spreading the word about the availability and importance of mercury thermostat recycling throughout California.

Pilot Project Metrics

By using the seven objectives based upon the DTSC Consent Order Exhibit B, this pilot project plan establishes metrics to measure pilot project results. These metrics will be used in preparation of the program modification plan by identifying:

1. If one or more pilot project should be continued or discontinued.
2. The level to which each pilot project was successful based primarily upon:
 - a. Number and list of new partners (Program participation) that educate and disseminate information
 - b. Number and list of new collection sites
 - c. Number of thermostats collected

Objectives 1 through 4 will be measured as shown in the Pilot Project Metrics column of the table, "Tactical Breakdown by Potential Program Participant for Outreach and Pilot Project Plans."

Objective 5 is measured as accomplished with this report by virtue of provision of "a proposed schedule for implementation of the pilot projects."

Objective 6 is measured as achieved with "implementation of the Pilot Project Plan in accordance with its provisions and schedule."

Objective 7 is measured as achieved when the results of the pilot projects are gathered and provided in a report in accordance with the time requirements.

Proposed Schedule for Implementation of the Pilot Projects

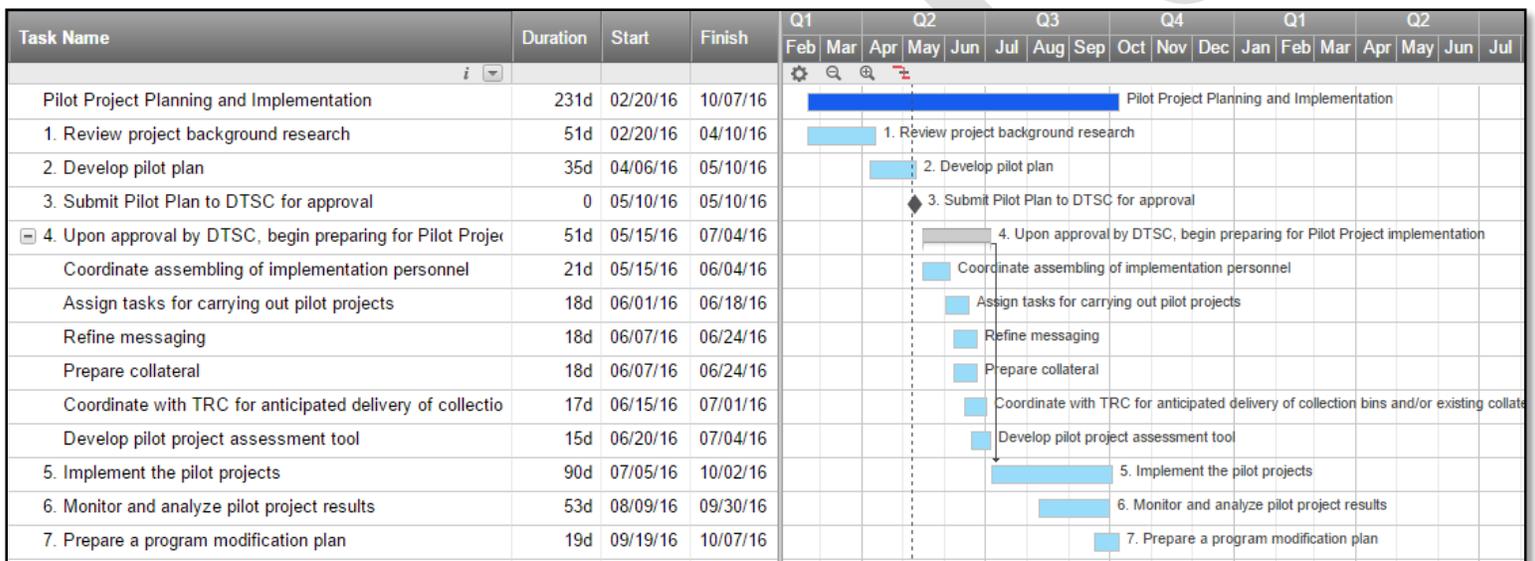
Because pilot project implementation is dependent upon DTSC pilot project plan approval, the proposed dates shown in the Proposed Schedule for Implementation of the Pilot Projects are subject to change.

Based upon the best case scenario, pilot project plan implementation would begin on July 10, 2016 (60 days after pilot project plan submission to DTSC on May 10, 2016 and assuming immediate approval.)

Pilot project tactics would begin first with the partners that are identified as the repositories for new bin placement. All other tactics will be in place or roll out over the course of the implementation period of approximately 80-90 days.

Before or at the end of the implementation period, programs deemed ineffective will be documented for DTSC with the suggestion for discontinuing. This information will be included in the Program Modification Plan due on October 7, 2016 or 90 days after pilot project implementation, whichever is sooner.

Figure B: Pilot Project Planning and Implementation Timeline Overview



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