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February 18, 2015

Pauline Batarseh, Chief
Policy Implementation Branch
Policy and Program Support Division
Hazardous Waste Management Program
1001 "I" Street
Post Office Box 806
Sacramento, California 95812-0806

Re: Thermostat Collection Program
July 2014 Summary of Violations
Respondent: Thomas & Betts Corporation

Dear Chief Batarseh:

Thomas & Betts Corporation ("T&B") acknowledges DTSC's January 30, 2015 notice letter regarding the Thermostat Collection Program. T&B appreciates DTSC's acknowledgment of the various positions of the stakeholders and proposal to negotiate modifications to the Thermostat Collection Program.

T&B concurs with the proposed approach. T&B further agrees with the topics outlined by DTSC as points requiring attention in these negotiations. It appears that DTSC and the participants agree that greater certainty, targets and measurable deliverables will assist both the agency and regulated community. Negotiation between a subset of Respondents and DTSC also strikes us as appropriate.

T&B understands the challenges and potentially inconsistent results of DTSC negotiating individually with Respondents. Modification to administration and parameters of the collection program need to be addressed at a macro level. Nonetheless, a select few Respondents may present unique issues requiring additional negotiating and compromise. T&B does not interpret DTSC's January 30, 2015 proposal to preclude such additional efforts.

By way of example and not as any effort to negotiate individually at this stage, T&B advised DTSC that T&B divested its HVAC business. The HVAC business was

the only business unit which incorporated the subject thermostats. T&B's organizational structure in this area is gone. T&B's relationships in the industry and involvement with trade associations simply no longer exist. We should rationally determine the role of a company such as T&B under such circumstances. However, as noted, these matters do not relate to all Respondents and should not properly be a distraction in modifying the general terms of the program.

T&B appreciates consideration of this additional item and looks forward to continuing to work with DTSC to achieve a workable and successful resolution.

Very truly yours,

Michael J. Geiger

MJG/dlb

cc: Donn Diebert (DTSC) Donn.Diebert@dtsc.ca.gov