

Material Separation Plan for the Diversion of Mercury

(MSP6)

January 1, 2013 – December 31, 2017

**Wheelabrator North Andover Inc.
North Andover, MA.**

August 2012

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Introduction

In 1998, the Massachusetts Department of Environmental Protection promulgated regulations governing the emissions from Municipal Waste Combustors (MWCs) [310 CMR 7.08 (2)]. Section 7.08(2)(f)(7)(a) requires that owners or operators of MWCs prepare and submit a materials separation plan (MSP) for the diversion of mercury-bearing products from municipal solid waste. MSP1 was implemented on January 1, 2000 and completed on June 30, 2002. MSP2 was implemented on July 1, 2002 and completed on June 30, 2004, MSP3 was implemented on July 1, 2004 and was completed on December 31, 2006. MSP4 was implemented on January 1 2007 and was completed on December 31, 2008. MSP4 was subsequently extended through calendar year 2009 and was completed on December 31, 2009. MSP5 was implemented on January 1, 2009 and was completed on December 31, 2012. Current plan will commence on January 1, 2013 and be completed on December 31, 2017.

Facility Description

The Wheelabrator North Andover waste-to-energy facility consists of two, identical mass-burn, municipal waste combustion (MWC) units, each with a capacity to combust 750 tons of municipal solid waste per day. The facility is located at 285 Holt Road, North Andover, MA.

Goal of the Plan

The overall goal of this Material Separation Plan (MSP) for the Wheelabrator North Andover municipal waste combustion facility is to attempt to divert mercury-containing products from the municipal solid waste stream that potentially could be delivered to the Wheelabrator North Andover facility. To accomplish this goal, Wheelabrator North Andover will attempt to educate municipal officials, school officials, health care professionals, the general public and businesses regarding the need to divert mercury-containing products from the municipal solid waste (MSW) stream and to provide a source of information concerning proper disposal. Wheelabrator North Andover will also provide resources for those that wish to properly dispose of and recycle their mercury-containing products.

Plan Development Process

The development of MSP6 was accomplished through numerous discussions with community coordinators for the Mercury Recovery Program, municipal officials in participating communities and Massachusetts Department of Environmental Protection staff.

Target Sectors

The target sectors for this Plan are the general public, local Health, Public Works, Building Departments, plumbing, electrical and building contractors, and schools within the Wheelabrator North Andover service area.

Service Area

The Wheelabrator North Andover facility serves twenty-three communities (see Table 1). Twenty-three communities are under contract or participate in the program under the expanded program provisions. Non-contract or "spot market" customers can vary from day-to-day and year-to-year use the remainder of the solid waste disposal capacity of the facility.

Description of Activities

Outreach/Education

- **Goal**
The goal of the Outreach/Education portion of MSP6 is to educate the general public about the potential effects of mercury on human health and the environment. Also, its goal is to inform residents, municipal officials, health professionals, contractors and school officials about common mercury-containing products, proper handling of mercury containing devices and how to utilize the community based collection program for the proper disposal of mercury and products containing mercury.
- **Web-site – “Keep Mercury from Rising”**
This internet-based community information resource is available at www.keepmercuryfromrising.org. The website has been revised to reflect the new theme/campaign style and focus more on facility programs and the mercury-containing items in trash including information regarding where you might find the products in your home and where the products should go for proper disposal.

Wheelabrator North Andover in conjunction with the other two Wheelabrator facilities plans to continue to maintain and enhance, as necessary, the web-site “Keep Mercury from Rising .org”, developed by the Energy Recovery Council. It is a functional site with good information and it will continue to be offered and updated as needed with new information. Energy Recovery Council will continue to monitor the web-site and its future development at the direction of Wheelabrator.

Budget Estimate:	<u>2013</u>	<u>2014</u>
	5,000	5,000

MSP6 Survey

In past MSPs a survey was conducted each year that was designed to measure positive changes in public attitudes and behaviors, as well as the receptiveness of the message. Beginning in MSP6 Wheelabrator North Andover will work in cooperation with MADEP in support of a state sponsored survey of communities throughout Massachusetts. The survey will be a part of a larger survey conducted by MADEP that will primarily consist of questions regarding recycling, waste reduction, reuse and composting. Certain questions regarding the MSP will be included to measure the positive changes in public attitudes and behaviors and the receptiveness by the general public of the message.

Budget Estimate:	<u>2012</u>	<u>2014</u>
	1,500	1,500

Regional Outreach

- **General Discussion**

Wheelabrator North Andover proposes to work in conjunction with the other two Wheelabrator Waste to Energy facilities located in Millbury and Saugus, Massachusetts in devising and implementing a regional outreach/education program.

The three Wheelabrator MWCs subject to 7.08(2)(f) have service territories that range from the Atlantic coast to Worcester and from New Hampshire to Rhode Island and Connecticut. All of these facilities also have a percentage of their waste coming from non-specific "markets". Therefore, the Regional outreach/education program, in addition to targeted local programs, has the ability to reach the greatest numbers of people and businesses.

The Regional program will not target specific municipalities in Massachusetts, but will focus on development and delivery of generic messages to educate consumers and others who handle mercury products. These messages may include: identification of mercury-containing products, efforts to raise awareness of health risks of improper disposal of mercury products (thermometers, fluorescent lighting, etc.) in the normal course of residential and commercial refuse collection, and providing consumers and others who handle mercury products with information concerning the proper method of recycling and/or disposal of such products.

The Regional program will use mass communication channels to reach the greatest number of Massachusetts' citizens, as well as smaller subsets of high-end users of mercury products, with specific action steps they can take to help ensure that mercury containing products are properly recycled and/or disposed.

Regional Outreach Programs

- **Radio Advertisements**

Radio is a targeted medium that provides cost-efficient mass communication and quickly builds frequency of message delivery. Radio added-value programs can provide an opportunity to interact with local communities. There are several radio stations (talk radio) that provide an excellent opportunity to discuss over the air different aspects of the Mercury Recovery Program. These programs also allow for direct communication with residents, as they often will call into the program with specific questions.

Wheelabrator North Andover plans to implement a two-week radio buy in April / May and September / October in both locally based smaller wattage radio stations and also in selected larger wattage radio stations. The advertisements will be scheduled to encourage the recycling mercury and devices that contain mercury.

Budget Estimate:	<u>2013</u>	<u>2014</u>
	27,000	40,613

Local Outreach Programs

- **Objectives**

- The objectives of the Local Outreach Program are:
- Inform the public (local residents) within the respective MWC facility's service area regarding the potential harm mercury poses to human health and the environment.

- Identify common products that contain mercury.
- Provide information about the local Mercury Recovery Program
- Provide information on the proper methods for handling and disposing of mercury containing products.

Local outreach activities will primarily include informational advertisements in local media, e.g., newspapers, regarding local mercury recycling programs such as thermometer exchange programs, mercury drop-off locations and times, Household Hazardous Waste Day collections etc., and production and distribution of other materials as needed for informing the public about mercury and the various MSP Programs.

The MSP Administrator has arranged with a news service to place ads in local newspapers. Therefore, a single ad placement will reach most, if not all, local newspapers in the Wheelabrator North Andover Contract Communities.

Budget Estimate:	<u>2013</u>	<u>2014</u>
• 4 newspaper ads per yr. / community (84 ads @ \$400.00 ea (1 st yr))	\$33,600	
• 5 newspaper ads per yr. / community (105 ads @ \$415.00 ea.)		\$43,575
• 6 HHW / Special ads per year	\$ 2,400	\$ 2,400
Total	\$36,000	\$45,975

- **Direct Mailing to Households**

During the administration of MSP5 in 2012 the program administrator had the opportunity to conduct an unofficial survey of residents in each community. Small stand-alone advertisements were delivered to each community library. It was at that time that the administrator had the opportunity to speak to either the library director and or the assistant director and staff at the library.

It was assumed that those working at the local library, especially those in administration would most likely be a fairly good representative sample of the knowledge base of the general local population regarding the Mercury Recovery Program in that particular community. While at each library the MSP administrator had the opportunity to speak with between two and five employees.

A majority of those surveyed knew that mercury was harmful and that it should be properly disposed of. It was estimated that over 50% of those interviewed did not know about the local community based Mercury Recovery Program. Many of those surveyed said they had heard of the program through radio or television advertisements or some knew of the program through local channels such as advertisements in the local newspaper, promotion on the town web-site, town sponsored cable TV bulletin boards or other type of notices. Most of those surveyed could not describe where in the community the program was located or what to do if they had a mercury containing device. The majority of those surveyed did not know that compact fluorescent light bulbs contained mercury or how to properly dispose of them.

All of the advertisements conducted in promoting the program and educating the general public regarding mercury, such as mass media television and radio, signs, displays,

mailings to contractors, local newspaper advertisements etc., is necessary and has been fairly successful. The results of this unofficial survey indicate many local residents are still not aware that a program to properly dispose of these products currently exists in their community. It appears that it would be beneficial to attempt, once again, to communicate directly with each household to inform and educate residents about mercury, products in the home that contain mercury and where to properly disposed of these products.

Wheelabrator proposes, in cooperation with the local community, through a direct mail campaign, to inform residents of the local Mercury Recovery Program. A flyer will be printed containing program information, what local city / town departments to contact for information regarding the program and where to safely dispose of mercury containing products in their community. Flyers will be printed and prepared for mailing as part of a community mailing such as tax bills, census, water bills or other community awareness information. The incremental increase in the cost of the actual mailing (handling costs and increased postage) will be covered by the program. A similar mailing was conducted in 2009 with approximately 80% of the communities participating.

Budget Estimate:	<u>2013</u>	<u>2014</u>
	28,788	0

- **Educational Boards**

Each year there are requests for educational boards that communities use to promote their Mercury Recovery Programs.

Budget Estimate:	<u>2013</u>	<u>2014</u>
	1,000	1,000

Mercury Recovery Program

- **Objectives**

Since the implementation of MSP1 each community has had their own locally based Mercury Recovery Program. The goal of the Mercury Recovery Program is to provide a centrally located and easily accessible site or sites in each community for the safe disposal of mercury and products containing mercury. Working closely with the Directors of Health, Boards of Health, Department of Public Works, Building Departments, other municipal officials and local residents' successful collection programs have been implemented in each community. The goal for MSP6 is to continue the development of these local collection programs in order to maximize the recovery of mercury and products containing mercury, thereby diverting these items from entering the municipal solid waste stream. The Mercury Recovery Program consists of several components as discussed below.

- **Community Based Collection Program**

In each participating Contract Community there is at least one and often two or three collection sites. At each site there is a minimum of two five-gallon plastic collection pails, a box of plastic zip lock bags and a mercury spill kit. Once the pail is full of mercury containing devices, the local coordinator at that particular site, or the MSP administrator, calls the 800 telephone number prominently displayed on the front of the pail for a pickup. Complete Recycling Solutions Inc. is the service provider for the program and normally will pickup the full pail within two weeks. Upon picking up the full pail, an empty pail is left at the site.

Budget Estimate:	<u>2013</u> \$6,000	<u>2014</u> \$6,000
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- **School Clean Sweeps**

The School Clean Sweeps Program was initiated in the first MSP and has been offered ever since. The school systems have all conducted Clean Sweeps and have removed most of the mercury containing devices. On occasion, schools that have conducted what they considered to be a thorough clean-out of mercury and mercury containing devices, have identified additional items containing mercury requiring an additional visit to that particular school system. The Clean Sweeps Program will continue to be offered to the school systems throughout MSP6, on a maintenance basis, promoting proper disposal of mercury containing devices just in case additional mercury containing devices are located in the schools.

A full School Clean Sweeps Program consists of an initial consultation, normally associated with a site visit. The School Clean Sweep Program will also replace on a one to one basis most common devices found in the science laboratories and nursing offices, i.e. lab thermometers, sphygmomanometers and barometers. Non-mercury replacements will be exchanged for these three mercury-containing items.

All of the schools in that particular school system are notified by an official of the school system regarding the impending program and provided with instructions regarding the identification of mercury and products containing mercury, collection and exchange of replacement products. Elemental mercury and devices containing mercury are identified and usually consolidated at the high school prior to the actual Clean Sweep.

Budget Estimate:	<u>2013</u> \$500	<u>2014</u> \$500
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- **Bulk (Miscellaneous) Mercury Collection Program**

The Bulk Mercury Collection Program was implemented in MSP2. When needed this program has been very beneficial. Large quantities of elemental mercury have been found in basements, garages, closets etc. The largest quantity of elemental mercury recovered was located in a wooden barrel in a resident's backyard. In these instances the program manager first inspects the elemental mercury, its' location and the container that it is in. The service provider is then contacted, given the specific information and then goes to that location to pick up the mercury.

The Bulk Mercury Collection Program will be continued in MSP6.

Budget Estimate:	<u>2013</u> \$500	<u>2014</u> \$500
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- **Thermometer Exchange Program**

An important component of the overall program has been the Thermometer Exchange Program. Although the actual number of thermometers collected through this aspect of the program has leveled off over the past few years there continues to be certain number of a residents that exchange mercury fever thermometers each year. The local coordinators in the Boards of Health or Department of Public Works still consider this aspect of the program important as an advertising tool and promotion for the program.

This program will be continued throughout MSP6. Each community will maintain a supply of new digital fever thermometers to be given to residents in exchange for glass mercury fever thermometers that they bring in for safe disposal. Additional digital thermometers will be provided to each community on an as needed basis.

Budget Estimate:	<u>2013</u> \$3,000	<u>2014</u> \$3,000
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- **Thermostat Program – Mailing to Contractors**

As part of past MSP efforts a direct outreach to specific contractors who come in direct contact with installation and removal of thermostats was conducted. The primarily focus of this outreach was directed towards plumbers, plumbing supply businesses, HVAC contractors and building contractors that do renovations.

The Mercury Recovery Act in Massachusetts now makes it illegal for any individual or business to improperly dispose of mercury or mercury containing devices. Contractors are the most likely to come in contact with a used thermostat when changing out old heating or cooling systems or just through energy saving efforts on the part of the homeowner.

As in past years, a postcard mailing will be conducted twice a year specifically targeting plumbing contractors, HVAC contractors and home improvement contractors with information informing them of the passage of the Mercury Recovery Act. The postcard will be mailed to the address of licensure for each contractor informing them where they can safely dispose of thermostats and other mercury containing devices.

Budget Estimate:	<u>2013</u> \$8,000	<u>2014</u> \$8,500
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- **Thermostat Rebate Program for Contractors**

Over the past several years selected plumbing supply and HVAC businesses have participated in the Thermostat Rebate Program. This aspect of the MSP has proven to be fairly successful in removing thermostats from the municipal waste stream. The small financial incentive has proven to be effective in motivating contractors and supply businesses in properly disposing of these devices.

This program has proven to be successful and it is planned to expand the program for MSP6 to additional locations. Each business will be provided with collection pails for the thermostats along with flyers for distribution to contractors. These flyers will also be used for window displays informing contractors that this business is participating in the program. The business will be reimbursed five dollars (\$5.00) for each mercury thermostat collected.

In turn the business will be expected to reimburse each contractor three dollars (\$3.00) per mercury thermostat.

Budget Estimate (Rebate):	<u>2013</u> \$7,000	<u>2014</u> \$7,000
Plumbing Supply Collection Costs:	\$3,000	\$3,500

- **Fluorescent Lamp Reimbursement Program**

The Fluorescent Lamp Reimbursement Program reimburses communities the full cost of recycling fluorescent lamps up to the amount listed in the Massachusetts Procurement Contract which at present is currently .06 cents per linear foot. This program has been very successful in encouraging communities to implement fluorescent lamp collection programs. Communities normally collect fluorescent lamps from municipal buildings and throughout the school system. Some communities also offer residents and small businesses the opportunity to recycle their fluorescent lamps. This program specifically excludes street lamps and ballasts. All lamps must be properly packaged. Additional charges by the service provider that result from the lamps not being properly packaged and ready for shipment will not be covered.

During MSP4 and MSP5 a concerted effort was made to incorporate local hardware stores into, the program in partnership with their local community. Currently throughout all three WTI service areas there are approximately forty-five hardware stores participating in the program. Local hardware stores provide a convenient drop-off location for residents interested in properly disposing of their fluorescent lamps. These partnerships have been extremely successful resulting in thousands of fluorescent lamps, primarily compact fluorescents, being diverted from the municipal waste stream.

The Fluorescent Lamp Reimbursement Program will continue in MSP6.

Budget Estimate:	<u>2013</u> \$17,000	<u>2014</u> \$19,000
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- **Universal Waste Shed**

During past MSP efforts communities have been provided with sheds to store Universal Waste. They have primarily been used to store fluorescent lamps. These sheds have proven to be essential in the success of local community in the collection and storage of fluorescent lamps and other mercury containing devices.

From time to time new communities contract with the WTI facility and often require a shed in order to implement a collection program for fluorescent lamps. In some cases larger communities have requested a second shed because they find one shed is just not enough to handle the volume of lamps collected. Often these additional sheds are placed at a different location in the community, such as at the school department. School departments are typically the largest generator of fluorescent in a community and often transport of the lamps from the schools to the central collection location (shed) is problematic.

Even though most of the communities have received a shed one in budgeted each year just in case it is needed by a new community or an established community program needs an additional shed.

The sheds are delivered and erected on an appropriate site selected by the community. Each shed has a sign identifying it as a Universal Waste Shed and lists the products considered as Universal Waste.

Universal Waste Sheds will continue to be offered to communities in MSP6

	<u>2013</u>	<u>2014</u>
Budget Estimate	\$2,300	\$2,400

- **Button-Cell Battery Collection**

The Button-Cell Collection Program is a voluntary program offered to each community. Small collection boxes including a colorful background that attaches to the back of the box is provided to each community. To successfully implement the program it is necessary to have an individual or organization volunteer their time to place the small collection boxes at appropriate locations throughout the community, monitor the boxes and periodically collect the button-cell batteries.

The Button-Cell Battery Collection Program has been fairly successful in the communities that have a dedicated and motivated “recycling committee” or other local organization willing to place the small cardboard collection boxes at appropriate locations throughout the community and collect the button-cell batteries on a fairly regular basis.

Communities are offered the opportunity to identify a local organization that would be interested in participating in the Button-Cell Battery Program as a fund-raiser for their organization. There are several different organizations that have proven to be effective in collecting the button-cell batteries in a local community. The ideal organization is one that is well known in the community and performs works that benefits the community such as a Recycling Committee, Environmental Organization, Garden Club, Friends of the Library, Friends of the Senior Center etc. It is also important that the group be able to sustain the program over multiple years. The groups are reimbursed \$100 per pound up to a maximum of \$500.00 per calendar year. There are three prerequisites for participation:

- Sustainability – The local group will have to agree to conduct the program for at least two years.
- Monitoring – The local group will place the containers in appropriate points-of-purchase locations such as drug stores, camera stores, jewelry stores etc. along with municipal locations such as Senior Citizen Centers and Libraries. The group will then monitor the boxes on a monthly basis, collecting the button-cell batteries, putting them into a plastic bag and depositing them at the community collection container.
- Payment – The button-cell batteries will be weighed as part of the service providers normal counting and weighing procedure after a container is picked up. At the end of each calendar year, the weight of the button-cell batteries collected during that year is tabulated. The organization will be

reimbursed \$100.00 per pound up to a total of five pounds. Payment will be made in the beginning of the following year.

Flyers have been designed, printed and will be provided to each group to help advertise the program and identifying the program as a fund-raiser for the local group. These flyers are useful for advertising in store windows and on or near the counter where the collection box is located.

Budget Estimate:	<u>2013</u> \$4,000	<u>2014</u> \$4,500
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- **Expanded Service Area**

During MSP4 the service area for the Mercury Recovery Program was expanded to include communities that were not contracted directly with the plant but trash was coming to the plant through private haulers. The Mercury Recovery Program has been offered to selected communities if certain criteria are met. The Mercury Recovery Program will continue to be offered to communities that qualify. If it can be verified that the trash from a particular community is being brought to a particular facility, and if the hauling company and or the community guarantees that this community's trash will continue to come to the facility for at least two years the Mercury Recovery Program will be offered to that community. The decision to offer the program to a particular community has been on a case by case basis. If it is determined that a particular community does qualify for the program, and if needed, a modification to MSP6 will be submitted at that time. This aspect of the program has been very successful resulting is several new communities being provided with the services of the program.

Program Administration

The Mercury Material Separation Program will be managed by the Wheelabrator North Andover facility. Wheelabrator North Andover has retained Mr. Patrick Scanlon of Scanlon Associates to conduct the general administration of the Plan. Mr. Scanlon will be responsible for ensuring the elements of the Plan are accomplished and for administering the budget. Mr. Scanlon will also coordinate with MA DEP to minimize duplication of efforts between this MSP and DEP's on-going efforts.

Budget Estimates

The budget estimates contained in this plan were based on the previous three-year averaged throughput at the WTI facility. Each year's plan is based on the actual throughput tonnage at the WTI facility for the previous year. This plan contains, for planning purposes only, the estimated budget for first two years of the plan. The budget for the last three years are not estimated at this time and will be submitted at the beginning of each calendar year as part of an annual modification to the plan.

At the beginning of each year a modification for the coming years estimated budget is submitted to the MADEP. This modified budget accurately reflects the amount of money available for the administration of the program for that specific calendar year. Also, dynamics of the implementation of the MSP may change during any given year and the modification may reflect an alteration or change in one or more operational aspects of the program

Measurement and Evaluation

Compliance with the Material Separation provisions requirements of 310 CMR 7.08 will be based upon the implementation of this Plan, e.g., implementation of a regional and local outreach program, offering a thermometer exchange program, etc This MSP does not estimate the amount of mercury expected to be diverted or the participation rate (i.e., number of people who will be moved to action). Experience and time have prioritized activities that have the greatest likelihood of success. However, an accurate accounting of the amount of mercury diverted from trash, even in hindsight, is difficult, if not impossible. A person persuaded by this MSP's Outreach Programs to properly recycle mercury may take the product to a resource provided by a waste-to-energy facility, or may use one of a number of other means that are not evaluated by the facility's MSP. A significant amount of the mercury diverted by the outreach efforts may be disposed or recycled in non-MSP location or as part of other collection programs. Indeed, if the education efforts provided by this MSP are successful, consumers will hopefully purchase non-mercury-containing products as a substitute for mercury-containing items.

Complete Recycling Services (CRS), a hazardous waste service company has been hired by Wheelabrator to service the community collection sites, school clean sweeps and bulk mercury collection programs. All mercury containing devices collected by the Mercury Recovery Program will be identified and counted. Each pail that is collected by CRS will be emptied onto a sorting table, counted and consolidated. The contents of each pail will be tabulated and the results of this process will be provided to the MADEP as part of the Program's Annual Report.

Table 1. Contract Communities - Wheelabrator North Andover Inc.

Community Population:

Amesbury	16,283	Manchester	5,136
Andover	33,201	Methuen	47,255
Arlington	42,844	Newburyport	17,416
Belmont	24,729	No. Andover	28,352
Billerica	40,243	Peabody	51,251
Boxborough	4,996	Pepperell	11,497
Carlisle	5,852	Watertown	31,915
Hamilton	7,764	Wenham	4,875
Ipswich	13,175	West Newbury	4,235
Lexington	31,394	Wilmington	22,325
Lincoln	6,362	Winchester	<u>22,374</u>
Lowell	106,519	TOTAL	577,993

Source: U.S. Census, 2010

MSP6 Estimated Budget for 2 Years

Number of Contract Communities Served - 21

Three year Average, processed tons – 451,177

Budget Estimate for 2013 through 2017 will change depending on total tonnage processed in each successive year. See attached Budget Estimate.

WTI No. Andover- MSP6– 2 Year Budget– January 1, 2013– December 31, 2014

<u>Admin Costs</u>	<u>2013</u>	<u>2014</u>
Fees & Expenses	53,500	55,000
WTI Admin Cost	3,500	3,500
WTI N.A. Admin Cost	5,000	5,000
Insurance	<u>3,000</u>	<u>3,100</u>
<i>Sub-Total</i>	65,000	66,600

Web-based Outreach

Web-site Management (ERC))	5,000	5,000
MSP Survey	1,500	1,500

Regional Outreach

- Radio Advertisements **27,000** **40,613**

Local Outreach

▪ News ads, 84 @ \$400 ea (1 st yr) (21 Commun x 4 ads ea)	33,600	
▪ New ads, 105 @ \$415 ea) (2 nd yr) (21 Commun x 5 ads ea)		43,575
HHW / Spec ads (6) @ \$400 ea	2,400	2,400
Direct Mail to Households	28,788	
▪ Replacement of Ed Boards	<u>1,000</u>	<u>1,000</u>
<i>Sub-Total</i>	65,788	46,975

Collection Costs

Community Collection Costs	6,000	6,000
School Clean Sweeps	500	500
Bulk Collections	500	500
Plumbing Supply Collection Costs	<u>3,000</u>	<u>3,500</u>
<i>Sub-Total</i>	10,000	10,500

Programs

Thermometer Exchange	3,000	3,000
Thermostat Contractor Mailing (2 mailings @ \$4,000 ea.)	8,000	8,500
Fluor Lamp Reimbursement	17,000	19,000
Universal Waste Shed (1 Unit)	2,300	2,400
Thermostat Rebate(Plumb Supp)	7,000	7,000
Button Battery Program	<u>4,000</u>	<u>4,500</u>
<i>Sub-Total</i>	41,300	44,400

<i>Contingency</i>	<u>10,000</u>	<u>10,000</u>
TOTAL	\$225,588	225,588

- 3 year average processed tonnage – 451,177 X .50 = \$225,588