

Washington State Mercury-Containing Lights

2015-2026

Product Stewardship Plan

The Washington State Mercury-Containing Lights Product Stewardship Program Plan is developed pursuant to the provisions of the Revised Code of Washington Chapter 70.275 RCW

PREPARED AND SUBMITTED BY:
PCA Product Stewardship Inc.

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For submission to:

Washington State Department of Ecology - Waste 2 Resources Program

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INTRODUCTION

The Washington State Mercury-Containing Lights Product Stewardship Program Plan (referred throughout this document as the “Plan”) is developed pursuant to the provisions of Chapter 70.275 of the Revised Code of Washington (Chapter 70.275 RCW) “Mercury-containing lights-proper disposal”. The Plan must be approved by the Washington State Department of Ecology (Ecology).

This Plan complies with the requirements of the “Rule” prescribed in (Chapter 173-910 Washington Administrative Code (Chapter 173-910 WAC) where there is no conflict with the requirements of Chapter 70.275 RCW.

According to the law, “...*Improper disposal methods (for mercury lights) will lead to mercury releases that threaten the environment and harm human health*” (RCW 70.275.010). This Plan outlines a Program intended to reduce improper disposal practices in Washington State. The law requires that the Program be operational on January 1, 2015. A draft version of the Plan was submitted to Ecology on June 12, 2014, and has been amended and re-submitted following a public consultation period that ended on July 9, 2014.

This Program operated in accordance with the Plan will be known as LightRecycle Washington (referred to in this document as the “Program”). The intent of the Program is to establish and operate a comprehensive, safe, and convenient collection, transportation, processing, recycling and final disposition system for a state-wide mercury-containing lights recycling Program (RCW 70.275.020).

1.1 Plan Elements

The key elements of the operation of the Program will be:

- **Stewardship Organization:** The Producers listed in Appendix A have designated PCA Product Stewardship Inc. (PCA) as the Stewardship Organization for the Washington State mercury-containing lights product stewardship Program. PCA will implement this Plan on behalf of the participating Producers. The Program will be publicly known as LightRecycle Washington.

- **Funding:** Beginning on January 1, 2015, all mercury containing lights sold at retail in or into Washington State will include an Environmental Handling Charge (EHC) to fund this Program.
- **Covered Products:** Mercury-containing lights accepted by the Program include compact fluorescent lamps (CFL) of all types and sizes, linear tubes, high-intensity discharge (HID) and other lights used for the purpose of functional illumination in homes, businesses and outdoor stationary fixtures. Collectively, these lights will be referred to as “Program Products.” Throughout this Plan the terms “lamp” and “light” will be used interchangeably.
- **Covered Entities:** The Program will accept Program Products from Covered Entities, defined as “...any person who purchased the mercury-containing light at retail and delivers no more than ten mercury-containing lights to a registered collector on any given day or utilizes a registered residential curbside collection program or a mail-back program for collection of mercury-containing lights and discards no more than fifteen mercury-containing lights into those programs on any given day.” (RCW 70.275.020(3)).
- **Collection Sites:** The Program will create a network of collection sites throughout the state that may include retailers, utilities, solid waste shippers, charities, household hazardous waste (HHW) facilities, Moderate Risk Waste (MRW) facilities, collection events, processing facilities, existing residential curbside collection systems and recyclers.
- **Transportation:** Collected lights will be packaged in Program provided Mercury vapor barrier packaging, defined as “...sealable containers that are specifically designed for the storage, handling, and transport of mercury-containing lights in order to prevent the escape of mercury into the environment (should breakage occur) by volatilization or any other means, and that meet the requirements for transporting by the United States postal service or a common carrier.” (RCW 70.275.020(10)). Collected lights will be transported to a contracted processor (recycler) using a number of transportation options including mail-back and ground transport.
- **Recycling:** Collected Program Products will be collected, transported and recycled as Universal Waste. Recovered mercury will be recycled, stored, managed, or disposed by the processor in compliance with applicable local, state, and Federal laws.
- **Outreach and Education:** A public awareness and education Program including a website and point of sale information will be developed. The Program will “...promote the safe handling and recycling of mercury-containing lights to the public, including producing and offering point-of-sale educational materials to retailers of mercury-containing lights and point-of-return educational materials to collection locations.” [RCW 70.275.030(5)].

1.2 Plan Approval Process

Plan approval steps are detailed below:

- PCA submitted the Plan to Ecology on June 12, 2014.
- Ecology posted the Plan on the agency website for public review on June 18, 2014.
- The public had until July 9, 2014 to review and comment on the Plan and submit comments to Ecology.
- Ecology reviewed the Plan and provided comments on behalf of the agency and other stakeholders to PCA. Ecology also sent all public comments on the Plan to PCA.
- PCA has revised the plan in response to feedback and comments raised during the consultation process.
- Ecology will review any additions or changes to the Plan. Ecology will also determine whether the plan complies with the chapter within 90 days after receipt of a complete plan (WAC 173-910-450(2)) and provide conditional approval.
- Ecology provided approval of the EHC on August 8, 2014, which was within 60 days of submittal of the Plan (RCW 70.275.050 (2)).
- PCA submitted a revised version of the Plan, including a list of the Registered Collection Sites, on December 1, 2014.

The latest version of the Plan can be found on Ecology's web site at:

<http://www.ecy.wa.gov/programs/swfa/mercurylights/>.

1.3 Plan Updates Required

The law requires, at a minimum, that this Plan be updated, reviewed and approved by Ecology according to the following schedule (RCW 70.275.040 (4)). Additional updates will be submitted to Ecology for approval as needed. Plan updates will comply with the Program rule (WAC 173-910-440).

DATE*	PLAN
June 12, 2014	Program Plan Due
August 11, 2014	60 day approval period for the EHC
January 1, 2015	Program start date
January 1, 2017	1 st Program plan update: 2 years from start date
January 1, 2021	2 nd Program plan update: 4 year interval
January 1, 2025	3 rd Program plan update: 4 year interval
July 1, 2026	Program "sunset" takes effect unless extended by Law

**Additional plan updates may be submitted for approval as needed.*

OVERALL PLAN REQUIREMENTS

The plan must include:

- (a) Names and contact information for all participating producers, including names of brands or brand labels used by specific producers;
- (b) The number of mercury-containing lights sold annually in or into the state by producers participating in the plan;
- (c) The types of mercury-containing lights that the program will accept; and
- (d) Details on the management and organization of the stewardship organization.

WAC 173-910-420(1)

2.1 Participating Producers

Definition of Producer

“Producers” are defined in the law (RCW 70.275.020(14)) as follows.

A “producer” means a person that:

- (a) Has or had legal ownership of the brand, brand name, or co-brand of a mercury-containing light sold in or into Washington state unless the brand owner is a retailer whose mercury-containing light was supplied by another producer participating in a stewardship program under this chapter;*
- (b) Imports or has imported mercury-containing lights branded by a producer that meets the requirements of (a) of this definition and where that producer has no physical presence in the United States;*
- (c) If (a) and (b) of this definition do not apply, makes or made a mercury-containing light that is offered for sale or sold in or into Washington state; or*
- (d) Sells or sold at wholesale or retail a mercury-containing light and does not have legal ownership of the brand and elects to fulfill the responsibilities of the producer for that product.*

Every producer of mercury-containing lights sold in or into Washington State for retail sale must participate in a product stewardship program for those products. The Program is open to all Producers.

Producer Requirements

No producer, wholesaler, retailer, electric utility, or other person may distribute, sell, or offer for sale mercury-containing lights for residential use to any person in this state unless the producer is participating in a product stewardship program under a plan approved by the department for mercury-containing lights. (RCW 70.275.090).

Producers cannot sell mercury-containing lights into Washington State unless they are participating in an Ecology approved product stewardship plan. Retailers are only considered Producers (and have the obligations of a Producer) if the retailer elects to fulfill the responsibilities of the Producer (RCW 70.275.020(14)).

Producer Recruitment

Producers participating in the LightRecycle Washington Program are identified in Appendix A. These Producers have designated PCA as the stewardship organization to administer the Program. PCA will submit the Plan and operate the Program on their behalf. PCA will conduct active recruitment of non-participating Producers to ensure maximum participation. Any Producers who are not in apparent compliance with the law will be invited to join LightRecycle Washington and pay any outstanding charges that would have been applied since the Program start on January 1, 2015. Ecology will be notified of any new Producers as they join the Program so that Ecology can maintain an updated list of Participating producers on their website. Producers who refuse to participate and are not in compliance with the law will be reported to Ecology.

2.2 Mercury-containing Light Sales

The [2012-2013 Northwest Residential Lighting Market Tracking Study](#) conducted by DNV KEMA Energy & Sustainability (an energy consultancy company) for the Northwest Energy Efficiency Alliance (NEEA) analyzes and reports CFL market trends. Data from this study was used to estimate the number of CFLs sold for the first year of the Program. According to the NEEA study, total Energy Star CFL sales in 2012 were approximately 9.2 million units in Washington State. Based on data from the British Columbia LightRecycle program, 60% of total CFL sales are for residential use. Based on the assumption that residential sales are representative of retail sales (the term used in the Law), it is estimated that 5.52 million CFLs were sold at retail in Washington State in 2012.

Additionally, the National Electrical Manufacturers Association (NEMA) collects national sales data from the members of its lamp manufacturing sector and compiles this data by calendar year. National sales data was adjusted by Washington State population percentage (2.2% of the U.S. population) to provide a working estimate of the lights sold in Washington State. Based on data provided by NEMA, and using a sales break-down of lighting types based on 2011 British Columbia (BC) data (the only full year in which the BC program was limited to residential use lamps), PCA estimates that 2.418 million fluorescent linear tubes (both straight and curved), and 30,000 HIDs

were sold at retail in Washington State in 2013. On the assumption of stable sales since 2013 for all lighting types, and totaling the estimates from NEMA study for tubes and HIDs and the NEEA study for CFLs, the 2015 base year sales estimate used in this Plan is 7.97 million units.

The following table shows a breakdown of the 2015 base year sales estimate by light type:

Light Type	Estimated 2015 Sales	Source
Fluorescent Linear Tubes (all sizes)	2,418,000	NEMA 2013 sales estimate, broken down by light type using 2011 BC sales data.
HIDs	30,000	
CFLs	5,520,000	NEEA Study, discounted using BC CFL sales data
Total	7,968,000	

At this time, LightRecycle Washington is the only Program submitted to Ecology, so it is assumed that the Producers participating in the Program will supply 100% of the Program Products sold into Washington State.

2.3 Covered Product Types

The Program will collect all mercury-containing lights as defined in RCW 70.275.020(9) as *lamps, bulbs, tubes, or other devices that contain mercury and provide functional illumination in homes, businesses, and outdoor stationary fixtures*. For greater clarity, the Program will collect and manage the following Program Product Categories:

1. Straight Fluorescent Tubes up to 8 feet in length
2. Curve-shaped Fluorescent Tubes including u-shaped, circular and others
3. Compact Fluorescent Lamps (CFL) – All sizes and types, including pin and screw base
4. High Intensity Discharge (HID) – HID lights include High Pressure Sodium, Low Pressure Sodium, Mercury Vapor and Metal Halide

As defined in RCW 70.275.020(3) (a) and (b), Covered Entities are limited to delivering a maximum of 10 lights on any given day to a registered collection site, unless they are participating in mail-back or curbside collection, in which case they may recycle no more than 15lights per day.

Brands of Non-participating Producers

The Program will accept all brands of lights from the categories cited above, including those from non-participating Producers. Where possible, the Program will identify the Producers of any brands not represented by Program participants and actively recruit them to join the Program. Any Producer not participating in an approved program may be in contravention of the Law.

Orphan Products

The Program will accept “orphan products” - defined in the Law to mean a “mercury-containing light that lacks a producer's brand, or for which the producer is no longer in business and has no successor in interest, or that bears a brand for which the department cannot identify an owner” (RCW 70.275.020).

2.4 Stewardship Organization

The Program must be operated by a stewardship organization and financed in the manner detailed in the law (RCW 70.275.050). The Stewardship Organization will implement and operate the Program, and manage the Program budget, including revenues, expenses, and Program administration costs, on behalf of the obligated Producers. The Stewardship Organization is also responsible for establishing the Collection Site network and developing Outreach and Education tools. NEMA provided technical guidance to PCA in developing this Plan. PCA has been designated as the stewardship organization to operate the Program on behalf of the Participating Producers. PCA is a not-for-profit product stewardship organization incorporated in Oregon and registered in Washington (UBI number 603 226 459). PCA is affiliated with Product Care Association of Canada, which operates product stewardship programs for mercury containing lamps and for other products in Canada. The primary point of contact for PCA on the preparation of this Program is:

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FINANCING SYSTEM

The plan must include a description of how the program will be funded by the producers and how compensation is paid to collectors, transporters, and processing facilities for all services provided to a plan and that payments to service providers will be made within an appropriate period of time from date of shipment or other time frame defined in contractual arrangements. Stewardship organizations will:

- (a) Provide confirmation that revenues and expenditures applicable to this program will be allocated in accordance with generally accepted accounting principles (GAAP).
- (b) Commit to providing an annual financial audit of the stewardship organization conducted by an independent certified public accountant

WAC 173-910-420(2)

3.1 Program Funding

The Program will be funded through an Environmental Handling Charge (EHC) added to the purchase price of each mercury-containing light sold at retail in or into Washington State starting on January 1, 2015 (RCW 70.275.050(3)). PCA has consulted with several stakeholders and industry members, including NEMA, in developing the recommended EHC. PCA also reviewed the budget in detail with Ecology and consulted with Ecology on the calculation of the EHC.

The EHC is \$0.25 per unit for all Program Products.

The EHC has been calculated based on a comprehensive 5-year budget projecting revenues from retail mercury-containing light sales and expenses for packaging and shipping materials, recycling, transportation, communication, education and outreach, and administration. PCA will pay the \$5,000 to Ecology on behalf of each participating Producer and this fee is included in the Program Expenses (as required in WAC 173-910-310). The EHC has been set at a rate to cover projected Program expenses over a 5-year period, taking into account a number of factors including the expected increase in the quantity of Program Products recovered, and at the same time a projected decline in revenue due to decreasing sales of CFLs. For the first 5 years of the Program, CFL sales are expected to decline at a rate of 2% per annum due to fewer CFL promotions, and based on CFL sales trends observed in other PCA programs. All other lighting types are assumed to have flat sales. An overview of the budget is provided in Appendix B.

Periodically, PCA will review actual Program revenue and expenses to determine if an adjustment to the EHC rate is needed. Any adjustments to the EHC will be submitted to Ecology for review and approval, as specified in RCW 70.275.050(4). In the fifth year of Program operations, a new comprehensive budget will be developed to set an EHC for the period from 2020 to mid-2026,

when the Program “sunset” takes effect, unless the Program has been extended by the law. It is anticipated the EHC will be higher for this period, as a result of larger collection volumes and lower revenues due to declining CFL sales. During this period, it is estimated CFL sales will decline at a significantly higher rate, estimated to be 9.8% per annum, due to the continuing migration by consumers to lighting technologies that do not use mercury such as Light Emitting Diode (LED) technology.

Revenues and expenditures applicable to this Program will be allocated in accordance with generally accepted accounting principles (GAAP). PCA commits to conducting an annual financial audit by an independent Certified Public Accountant (CPA) and to provide Ecology with audited annual financial statements. Certain confidential business information for Producers and service providers may be withheld or aggregated.

The EHC must be included in the final purchase price to the consumer (RCW 70.275.050 (3)). Each participant in the Program (Producer, or retailer as remitter if applicable) is required to report the number of units by type of Program Products sold during the reporting period using PCA’s web-based reporting portal. PCA will establish and distribute policies and guidelines for sales data reporting and EHC remittance prior to the commencement of the Program. The reporting period will be monthly, and EHC remittances must be received by the Program before the end of the month following the reporting month. Policies will be considered to allow less frequent reporting for participants who are remitting below a specified threshold.

According to the law, Producers are obligated to report and remit EHCs to PCA based on the number of Program Products sold. Producers are required to add the EHC to the cost of Program Products which are supplied to retailers in Washington State and intended for retail sale. In some cases the retailer may be better positioned to determine the quantity of Program Products sold in or into Washington and may prefer to report and remit EHCs directly to the Program, rather than to pay the EHCs to their supplier. The retailer can elect to remit the EHCs directly to the Program on the Producer’s behalf through a binding remitter agreement and must notify PCA in writing of any such arrangements to ensure all EHCs are properly recorded and remitted. In such a case, the Producer would not invoice the retailer at the time of supply, and instead the retailer would add the EHC to the cost of lights sold at retail, and remit the EHCs directly to the Program on behalf of the Producer.

Remitting retailers will be entitled to retain a part of the EHC, as specified by the Program, as a commission to offset any administrative costs associated with the reporting and remittance of the EHC directly to the Program. Retailers will be informed of the amount of the retailer commission before the Program implementation date (RCW 70.275.050 (3)(b)).

The proposed system of collection, transportation and processing of Program Products is described below in this Program Plan. In general, the Program will have contracts with the transporter and processor, and will commit to make prompt payments in accordance with the terms of those agreements. The Program will register collection sites using an online registration system or if necessary by written agreement. The Program will be responsible for the cost of transporting and processing Program Products collected. It is the intent of the Program that compensation will not be paid to collectors.

USE OF WA STATE BUSINESSES

The plan must explain how it seeks to use businesses within the state, including utilities, retailers, charities, household hazardous waste facilities, processing facilities, recycling facilities, and collection and transportation services for implementation of the plan including existing curbside collection services and existing mail-back services for implementation of the plan.

WAC 173-910-420(3)

4.1 Washington State Businesses

PCA will include Washington State businesses when soliciting services for Program design, education, collection, transportation, and processing services to implement this Program. The following Washington State businesses are current or anticipated service providers to the Program.

Company	UBI Number	Location	Function
Peter Thermos LLC	603 278 604	Seattle, WA	Program Coordinator, Education and Outreach Consultant
Full Circle Environmental	601 604 210	Seattle, WA	Environmental Services and Producer Responsibility Consulting
Sprout A Design Office	602 175 193	Seattle, WA	Graphic Services and Design Consultant
Fuse IQ	602 797607	Seattle, WA	Web Development
EcoLights Northwest, LLC	601 638 547	Seattle, WA	Light boxes and supplies, spill kits, and recycling services
Total Reclaim Inc.	601 350 223	Seattle, WA	Transportation Services

PCA will continue to utilize Washington State businesses when implementing and operating the Program when it is economically sustainable and feasible to do so. Existing Collection Sites throughout Washington State, including retailers, household hazardous waste facilities and curbside and mail-back services will be contacted and invited to participate in the Program collection network as described in the Collectors section. The Program will also include Washington State associations such as (but not limited to) the Washington Retail Association and the Washington State Recycling Association as part of communication, Outreach and Education efforts. More detail regarding the outreach to Washington State businesses and stakeholders is provided in the Education, Public Outreach and Marketing section.

PLAN GOALS

The plan will provide goals for the collection of mercury-containing lights for five years of operation, including:

- (a) Total number of mercury-containing lights sold in or into the state;
- (b) An estimate of the amount of mercury-containing lights available for collection from covered entities; and
- (c) Annual program goals for collection of mercury-containing lights from covered entities for the next five years

WAC 173-910-420(4)

5.1 Light Sales

As outlined in Section 2, PCA estimates that 7.97 million mercury-containing lights were sold at retail into Washington State in 2013, and that quantity will be used as the 2015 base year sales estimate for the Program. Sales of Program Products for subsequent years have been estimated on the assumption that sales number will be flat over that time period for all light types, except that CFL sales are projected to decline at a rate of 2% per year, based on CFL sales trends observed in other PCA programs. Sales data for CFLs in BC between 2012 and 2013 indicate a decline in sales of 9.8%. However due to the high number of utility promotions for CFLs in Washington, it is estimated that the annual decline will be a more modest 2% for the first 5 years of the Program. For later Program years a 9.8% annual decrease is estimated, as the migration from mercury containing lights to other lighting technologies such as Light Emitting Diode (LED) technology accelerates.

Based on the assumptions above, the following table shows the expected total number of mercury-containing lights to be sold in or into Washington State over the next 5 years:

	2015	2016	2017	2018	2019
Total Program Products Sold	7,968,000	7,857,600	7,749,408	7,643,380	7,539,472

5.2 Lights Available for Collection

The number of lights actually available for collection as waste lights in a given year is subject to a number of complex and changing factors which determine the usage and lifecycle of a particular

light. In these circumstances, the Program makes the assumption that the number of mercury-containing lights potentially available for collection from covered entities is the same as the number sold in the same year. The number of lamps actually collected will be compared to the number of lamps reported to the Program as sold in the same year, to determine a recovery rate.

To estimate the number of Program Products to be collected, PCA accumulated data from the collection networks currently operating in Washington State:

1. **WA State Household Hazardous Waste (HHW) 2013 Reports** – Ecology collects data from municipal HHW programs throughout the state. This data provides separate reporting of mercury-containing lights received at HHW facilities from Washington residents, reported to Ecology from HHW operators by weight (pounds). The HHW data does include lights received from Conditionally Exempt Small Quantity Generators.
2. **Take it Back Network (TIBN) 2013 Data** - The TIBN collects CFLs and linear tubes through participating retailers in Snohomish and King Counties and to a lesser extent, Pierce County. All collection data from the TIBN is included in the base-year collection estimate as these sources typically received less than 10 units per day per participant. TIBN data is reported in pounds.
3. **Puget Sound Energy (PSE) 2013 Data** – PSE collects residential CFLs from Covered Entities at office and business locations in Western Washington. The quantity of CFLs collected in 2013 was reported in pounds.

The quantity of Program Products currently collected through retail stores or from on-line mail-back collection programs is not included in the baseline collection estimate because those figures are not publicly available.

Collection data that is received in pounds is converted to units using the following conversion factors:

Compact fluorescent lights: 1 light = 0.25 pound

4' Linear fluorescent lights: 1 tube = 0.5 pound

8' Linear fluorescent lights: 1 tube = 1 pound

Residential HID lights: 1 light = 1.5 pounds

Aggregated data from the collection networks listed above results in a total of 403,516 pounds of lights collected in 2013. Applying the percentage breakdown by type of lights collected based on data from PCA's BC LightRecycle program in 2011, results in a collection estimate for 2013 of 904,106 units. It is assumed that in the first year of operations the Program will increase collection volume by 5% by expanding and promoting the current collection network, resulting in a 2015 base year collection of 949,311 units.

The following table shows the calculation of the 2015 base year collection estimate:

Light Type	% Breakdown (BC 2011 Data)	Weight (pounds)	Units per Pound	Units by Type
Total weight collected through existing network		403,516		
CFL's	18%	72,898	0.25	291,592
2-4' Tubes	70%	281,897	0.5	563,793
8' Tubes and HID's	12%	48,722	1	48,722
Total 2013 Units Collected				904,106
Collection Increase				5%
2015 Estimate				949,311

5.3 Annual Collection Goals

Washington State has some existing networks for collecting mercury-containing lights as described above, however much of this infrastructure is concentrated in King, Pierce and Snohomish Counties. This tri-county area accounts for about 50% of state population, 65% of lights collected through HHW sources and 100% of the Take it Back Network volumes. The Program will increase accessibility by providing additional collection sites throughout the state, and reaching rural communities that are not currently serviced by the existing network. The collection network will be free of charge to consumers, eliminating the recycling fees that some collection sites currently charge, which will improve accessibility and increase collections. Another important method of increasing the quantity collected is the promotion of the Program through Outreach and Education initiatives.

As a result, the Program collection goal is to continue to increase collection quantities from the 2015 base year collection estimate, by at least 5% annually. This increase in collection volume will be accomplished by expanding and promoting the collection network as described above and increasing Program awareness.

The following table outlines the collection targets for the Program for the next 5 years:

	2013 Estimate	2015	2016	2017	2018	2019
Total units collected	904,106	949,311	996,777	1,046,616	1,098,946	1,153,894
Annual collection increase		5%	5%	5%	5%	5%

The base year estimate for sales of 7,968,000 units, and the base year collection estimate of 949,311 units, result in an initial recovery rate of 12% for 2015. PCA's BC LightRecycle program, which includes both residential and commercial use mercury-containing lights, had a recovery rate

of 11% after 4 years of operation. The 2015 collection target of 949,311 units and recovery rate of 12%, is considered a realistic target for the first year of Program operations based on this direct operational experience.

The Program will strive to exceed the targets listed above, and will continue to promote and encourage the collection of lights even after targets are met. The 5% annual increase is the baseline target that was used for budgeting purposes. If the quantity of lights collected exceeds these target amounts, the budget and EHC rate will be revised accordingly to ensure the Program has sufficient funding to support the volume that is collected.

PCA has a goal of registering as many collectors in the existing network as possible for the Program since the public is already recycling bulbs at these facilities and locations. These collectors may include HHW collection sites, retail locations and other entities. Rural counties where there are currently few collection sites are expected to achieve more significant percentage increases in collection volume compared to counties with existing collection facilities, such as King, Pierce and Snohomish counties. As PCA gains experience with the collection network and the number of lights collected annually in each county, targets can be increased.

By June 1, 2016, PCA will submit the 2015 annual report to Ecology that will state unit sales and units collected during that calendar year. This actual collection data will replace the 2015 baseline collection estimate and the Program goals will be increased if actual collection is significantly higher than the estimate. The Program will track and report on the quantity of Program Products sold and collected on an annual basis and this data will be used to assess Program performance and revise goals on an on-going basis. Any changes to Program goals will be included in subsequent revisions to this Plan and annual reports submitted to Ecology.

COLLECTORS

The plan must include the following information about collectors participating in the plan:

- (a) The type of collection services in the plan, including curbside collection activities, household hazardous waste facilities, drop-off locations, collection events, and accumulation points for curbside or mail-back collection;
- (b) Registration information for collectors participating in the plan as required in WAC 173-910-520(1), including accumulation points used for curbside or mail-back collection;
- (c) A written statement from each collector ensuring that the collector will comply with the requirements in WAC 173-910-520;
- (d) A statement that collection sites will be:
 - (i) Staffed during operating hours; and
 - (ii) Open during regularly scheduled hours and on an ongoing basis.

- (e) A description of the consideration given to existing residential curbside collection infrastructure and mail-back systems as appropriate collection mechanisms;
- (f) A statement identifying how quickly collection containers will be provided once containers reach capacity;
- (g) A description of the communication and outreach process to answer questions, provide supplies, or provide technical assistance to collectors;
- (h) A description of the technical assistance to be provided to collection sites, including written instructions on how to participate in the program and how to appropriately handle and store mercury-containing lights;
- (i) A description of the packaging and shipping materials that will be used when collecting, accumulating, storing, and transporting mercury-containing lights to minimize the release of mercury into the environment and to minimize breakage; and
- (j) Drafts of spill and release response plan and worker safety plan required in WAC 173-910-520.

WAC 173-910-420(5)

6.1 The Program Collection System

The law requires: *(4) Product stewardship programs shall provide, at a minimum, no cost services in all cities in the state with populations greater than ten thousand and all counties of the state on an ongoing, year-round basis. (RCW 70.275.030)*

The Program intends to utilize the existing collection network currently established in Washington State. Although PCA cannot require any existing collector to join LightRecycle Washington, all existing collection sites will be invited to participate. The Program will expand the collection system with additional collection sites, particularly in rural areas. There will be no charge imposed on Covered Entities to drop off lights at any Program collection location. PCA may hold collection events in rural areas not adequately served by permanent collection sites.

The collection network will continue to be developed through 2014 as well as after Program implementation on January 1, 2015, taking into consideration factors such as availability and capacity of facilities, proximity to population, ease of access and cost effectiveness.

Potential collection sites include retailers, recycling organizations and businesses (both non-profit and for profit), local government Household Hazardous Waste (HHW) or Moderate Risk Waste (MRW) collectors, local government recycling centers, curbside programs, transfer stations and other associations or businesses interested in participating in the Program, including any other locations which currently collect mercury-containing lights. All mercury-containing lights that are collected through Program collection sites will be picked up or mailed to the processor where they

will be recycled. In some areas of Washington, solid waste management companies offer curbside collection of mercury-containing lights, meaning that residents are able to place lamps on or near garbage and recycling containers for pick-up at curbside. Curbside or mail-back collection programs can join the Program as part of the collection network.

Mail-back programs are sometimes used to create a collection service for certain types of lights. Collection containers that are designed to store and ship lights are sent to designated collection sites and when the containers are full, they are shipped to the processor, usually via common carrier.

The Program will accept lamps collected through a curbside or mail-back collection program in Washington State, (up to the limits set forth in the law) and LightRecycle Washington will provide supplies, transportation and processing at no charge provided that the waste management company, utility or other entity registers with the Program as an authorized collector.

Registered Collection Sites

It has been determined that 94 Collection Sites located in the cities and counties listed in Appendix C are necessary to fulfill the requirements of the law. Appendix C lists cities with populations over 10,000 and the remaining counties that have no cities with populations over 10,000. If a county has a city with a population greater than 10,000, the county site requirement will be fulfilled by the establishment of a collection site in that city.

As of December 1, 2014, the list of registered Collection Sites includes 130 sites that will accept all program products and 61 sites that will accept CFLs only for a total of 191 Collection Sites. One curbside collection program has also registered. The types of Collection Sites that have registered is provided below, and a list of all registered Collection Sites is provided in Appendix C.

- Collection Sites: All Program Products
 - 40 – MRW, HHW, transfer station and other municipal facilities
 - 90 – Retail locations
- Collection Sites: CFLs Only
 - 61 Retail Locations
- Curbside Collection Programs:
 - 1 - Curbside Waste Management Company (Recology/CleanScapes)

Over 20 other retail locations and 5 municipal locations are currently considering becoming Collection Sites in the Program. Additionally, retail chains with over 80 locations are considering becoming Collection Sites for CFLs only.

Two additional waste management companies with curbside fluorescent lamp collection programs have been contacted to discuss participating in the Program, and one is reviewing information about the Program.

The current network of 191 Collection Sites will provide a convenient drop-off option to the majority of Washington State residents and should allow the Program to meet and exceed collection goals. However, LightRecycle Washington will continue to add Collection Sites to increase convenience and ensure our ability to meet and exceed the collection goals described in the Plan.

Cities of 10,000 or more people and counties that do not have a registered Collection Site will be serviced by collection events if no Collection Site is registered before the collection event is scheduled.

In addition to collecting mercury-containing lights, collection site operators will:

- Request transportation for filled containers of lights.
- Re-order supplies needed to store, transport and manage lights.
- Receive LightRecycle Washington operation information and marketing materials.
- Provide feedback to the Program.

Collection sites can communicate with the Program in three ways:

1. Log in to the Website at www.lightrecyclewa.org
2. Call the toll-free telephone number for the Program
3. Contact the Program by fax

Collection sites will be classified by the Program as “large” or “small” based on the quantities that are collected and their location and will be serviced as follows:

Large collection sites:

- Request transportation of Program materials either online or by telephone. (Pick-ups are usually made within one to two weeks depending on the collection site location and when the request is made).
- Receive supplies when collected lights are picked up if supplies are needed (in most cases).
- May use larger lamp storage containers, such as fiber drums or pallet boxes.

Small collection sites:

- Will be serviced by common carrier (such as FedEx) who will pick up sealed boxes of collected Program Products
- Receive supplies via common carrier, generally within one to two weeks from the time of request.

Collection Site Supplies and Information

Collection sites will be provided with the supplies and information they need to safely collect, store, manage and prepare for the shipment of mercury-containing lights.

Mercury vapor barrier packaging is required for containers that are used to store and transport mercury-containing lights. These containers will include a mercury vapor barrier as described in RCW 70.275.020(10) that meets the requirements for transport by the United States Postal Service or a common carrier, such as FedEx. The containers themselves are primarily cardboard boxes that have been designed to hold various types and sizes of lights in quantities that can be handled safely and shipped economically.

Every LightRecycle Washington collection site will be provided a printed copy of the Collection Site Guidelines. This document provides detailed instructions on how to operate a collection site including:

- (a) Appropriate handling and storage of mercury-containing lights;
- (b) Logistics management for the pick-up of filled collection containers and the drop-off of replacement containers;
- (c) A communication and outreach process to answer questions, provide supplies, or provide technical assistance to collectors;
- (d) Technical assistance to collection sites;
- (e) Packing and shipping materials;
- (f) Spill and release response plan;
- (f) Worker safety plan; and,
- (g) Marketing materials (posters, brochures...) available to collection sites.

The Program may change the Collection Site Guideline, supplies and marketing materials over the course of the Program. When the Collection Site Guideline is revised, Collection Sites will be notified and provided with an updated copy. The Collection Site Guideline can also be downloaded at this Web address:

www.lightrecyclewa.org/collection_site_guideline

Marketing materials will be shipped to collection sites prior to the launch of the Program on January 1, 2015, and on an ongoing basis. The initial set of materials includes:

- “Recycle Here” posters featuring images of mercury-containing lights and basic Program information.
- “Recycle Here” banners for facilities requiring outdoor signage.
- Rack cards are 4 x 6 inch cards with Program details and a quick response code which can be scanned by a smart phone, taking the user to the Collection Site locator Web application.

The following graphic shows an example rack card:



Additional outreach materials will be developed and produced before and after the Program launch in January 2015.

Broken Mercury-containing Lights

Using safe handling and management practices for lights helps to avoid breakage. However, the fragile nature of lights indicates that collection sites must be prepared to manage broken lights. Broken lights can come from two sources:

1. Collected lights that are broken after being dropped off at the collection site.
2. Residents dropping off broken lights in a sealed bag or container.

A broken light clean-up kit will be provided to all collection sites for lights that are broken after being dropped off. Clean-up supplies can be re-ordered with other Program supplies.

Broken lights that have been placed in a sealed container may be included with lights that have been collected for the Program. They are then transported and recycled with other Program materials.

The Washington State Department of Ecology broken light clean-up procedure is available on the Program website and in the Collection Site Guidelines. The key elements of this procedure are as follows:

How to Clean up a Broken Fluorescent Bulb

Be careful not to break fluorescent bulbs. However, if you do break a fluorescent or other mercury-containing bulb, do not panic, and follow the following instructions:

Avoid breathing vapors or touching broken materials.

Do not vacuum or sweep.

1. Open windows to vent vapors for at least 15 minutes. Leave the area during this time.
2. Use stiff paper or cardboard to pick up large pieces.
3. Use duct tape to pick up small pieces and powder.
4. Wipe the area clean with a damp paper towel or wet wipe.
5. Place all materials in a sealed container, preferably made of glass and with a good lid.
6. Immediately remove the container from the home.
7. Wash your hands.
8. Dispose of at your local hazardous-waste facility—not in your trash. (Contact [1-800-RECYCLE](tel:1-800-RECYCLE) or www.lightrecyclewa.org for locations.)

It may be a good idea to cover porous flooring with a sheet of plastic when changing bulbs. Some people choose to wear nitrile or neoprene gloves and/or a chemically protective mask, but there is no evidence that this is necessary.

http://www.ecy.wa.gov/mercury/mercury_bulb_cleanup.html

6.2 Registration Information

Before the January 1, 2015 start-up date, Program information for interested collection sites will be available on the LightRecycle Washington website at www.lightrecyclewa.org. The Program will register interested organizations that can provide collection services through the Program website through an online registration process. PCA will not directly own or manage collection sites.

Collection sites will be registered using a streamlined process, making it easy to sign up while meeting all the requirements set forth in the law and rules. Two registration methods will be offered:

1. An online form can be completed to provide all required information.
2. A written proposal is available with the same requirements as the online form.

As part of the registration process, collectors will be required to verify they comply with the requirements in WAC 173-910-520; including confirmation that collection sites will be open and

staffed during regularly scheduled hours and on an ongoing basis. Collection sites will not be allowed to crush or process collected lights. More detailed information on operating procedures for Collection Sites can be found in the Collection Site Guideline referenced above.

Registration information for all participating Collection Sites are included in Appendix E.

6.3 Universal Waste

The Program will collect, transport and manage mercury-containing lights as Universal Waste Lamps. Collection sites will be Small Quantity Handlers of Universal Waste (SQHUW) (WAC 173-303-573) and the frequency of pick-up will ensure all sites maintain this regulatory status. As SQHUW, Collection Sites can store up to 2200 pounds of mercury-containing lights at any one time, however collected lights can be picked up upon request or mailed to the processor as frequently as needed. There are no registration requirements for SQHUW's; however, WAC 173-303-573 provides standards and procedures for managing mercury-containing lights. The Program will comply with Universal Waste Regulations but may have additional requirements to comply with Rules established in WAC 173-303-190 (Preparing Dangerous Waste for Transport).

As mentioned above, the Collection Site Guideline will be provided to Collection Sites and can be downloaded from the LightRecycle Washington website.

TRANSPORTERS

The plan must include information about transporters participating in the plan, including:

- (a) Registration information for transporters participating in the plan, including names, addresses, and contact information.
- (b) A written statement from each transporter ensuring that the transporter will comply with the requirements in WAC 173-910-530.

WAC 173-910-420(6)

7.1 Program Transporter

The initial Program transporter for direct pick-up from Collection Sites will be Total Reclaim Inc. Total Reclaim complies with the requirements of WAC 173-910-530 and is a registered hauler of recyclables as required by Chapter 173-345 WAC.

Registration information for Total Reclaim is provided below.

Total Reclaim Inc.

Common Carrier UTC Permit # MC-661411-C

US DOT Haz Mat # 820837

Contact: Patricia Rosenfeld

Address: 2200 6th Ave South Seattle, WA 98134

Phone: 206-343-7443

PCA will contract with Total Reclaim as the Transporter for the Program. Total Reclaim may sub-contract with third party transporters at their discretion, but must ensure that any additional transporters used meet the requirements of WAC 173-910-530. A detailed contingency plan will be included in the contract outlining procedures to follow in the event Total Reclaim cannot operate or provide services to the Program. The Program may add or change Transporters during the course of the approved Program, subject to approval by Ecology.

Collected Lights that are mailed to the processor will be delivered by a common carrier (such as FedEx) that meets the requirements for registered shippers of recyclables. As described in Section 1.1, Collected lights will be packaged in Program provided Mercury vapor barrier packaging, defined as “...sealable containers that are specifically designed for the storage, handling, and

transport of mercury-containing lights in order to prevent the escape of mercury into the environment (should breakage occur) by volatilization or any other means, and that meet the requirements for transporting by the United States postal service or a common carrier.” (RCW 70.275.020(10)). Shipping costs will be covered by the Program.

Provided below is copy of the written statement that Total Reclaim has provided to PCA acknowledging the need to comply with the requirements in WAC 173-910-530.



July 23, 2014

Ms. Lauren Kulokas
Program Coordinator
Product Care Association
105 West 3rd Avenue
Vancouver BC, V5Y 1E6

RE: WAC 173-910-530 Transporter Requirements – Mercury-Containing Lights Product Stewardship Program

Ms. Kulokas:

Total Reclaim, Inc. does comply with the requirements contained in WAC 173-910-530, as well as other requirements of the chapter.

Thank you for the opportunity to participate in this important new recycling program.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Lorch', is written over a light blue dotted grid background.

Craig Lorch

Total Reclaim, Inc.

PROCESSING FACILITIES

The Plan must include information about processing facilities participating in the plan, including:

(a) Registration information for processors participating in the plan, including names, addresses, contact information and hours of operation;

(b) A description of the methods used to process mercury-containing lights at each processing facility in the program; and

(c) Compliance audit reports for each processing facility participating in the plan completed by a qualified third party. The compliance audit will research, review, and report on the following:

(i) Compliance with all federal, state, and local requirements and, if it exports, those of all transit and recipient countries that are applicable to the operations and transactions in which it engages related to the processing of mercury-containing lights, components, parts, and materials and disposal of residuals. These include, but are not limited to, applicable legal requirements relating to:

(A) Waste and recyclables processing, storage, handling, and shipping;

(B) Air emissions and waste water discharge, including storm water discharges;

(C) Worker health and safety; and

(D) Trans-boundary movement of mercury-containing lights, components, materials, waste, or scrap for reuse, recycling, or disposal.

(ii) Information on financial penalties, regulatory orders, or violations the processing facility received in the previous three years; and

(iii) Any other information requested by the department.

WAC 173-910-420(7)

8.1 Program Processor

The initial Processor for the Program will be Ecolights Northwest. EcoLights was selected through a competitive RFP process which was conducted previously by PCA during the development of the State program (which will not be implemented). Based on the recentness of that selection process, the Program will contract with EcoLights as the initial recycling processor for the Program.

Registration information for EcoLights is provided below.

EcoLights Northwest LLC

Contact: Alex Ralph

1915 S. Corgiat Drive

Seattle, WA 98108

Phone: 206-343-1247

Hours: Monday – Friday 7:30 – 4:30

Collected Program Products will be recycled to the maximum extent possible at all times. Mercury-containing lights are crushed by the processor in a specialized machine for processing lamps that operates under negative pressure. The crushed lamps are separated into component parts; glass, aluminum endcaps, and mercury phosphor powder, for shipment to downstream recycling vendors. The glass is used as aggregate in the manufacture of concrete, aluminum end-caps are sold to scrap aluminum buyers, and the mercury phosphor powder is shipped to an EPA regulated and approved mercury retort for purification. Following retort, the mercury is available for use in new lighting products and the remaining phosphor powder is shipped for recovery of rare earth elements contained in the powder. Nearly 100% of non-hazardous Program material, including glass and aluminum, are recycled.

PCA will contract with EcoLights Northwest as the Program recycler. A detailed contingency plan will be included in the contract outlining procedures to follow in the event EcoLights Northwest cannot operate or provide services to the Program. The Program may add or change Processors during the course of the approved Program, subject to approval by Ecology.

Ecolights Northwest has provided PCA and Ecology with a Compliance Audit Report completed by a qualified third party that satisfies all the requirements of WAC 173-910-420(7)(c).

RECORD KEEPING

The plan must include procedures for how the stewardship organization will collect and maintain records to meet and demonstrate compliance with the recordkeeping requirements of this chapter. At a minimum, the stewardship organization will track the following information:

- (a) Total number of mercury-containing lights sold in or into Washington State for all producers participating in the plan.
- (b) The types of mercury-containing lights collected by the program.
- (c) List of all collection sites and collection services, including curbside and mail back.
- (d) Identification of transporters and processing facilities participating in the plan.
- (e) Mercury-containing lights collected, transported, and processed for the plan, including:

(i) Total mercury-containing lights, by weight in pounds, collected from individual collection sites collection services, curbside and mail back.

(ii) Final destination and quantities of lights processed and disposed.

(f) Education efforts for consumers, retailers, utilities, collectors, transporters, and processors, including assessments of the effectiveness of these efforts.

(g) Efforts to promote the mercury-containing lights collection program.

WAC 173-910-420 (8)

9.1 Record Keeping Overview

PCA will collect and maintain records relating to Program activity in order to demonstrate compliance and substantiate Program performance improvement. The information submitted to Ecology in the required Annual Report will include:

- (a) Annual Mercury-containing Light Sales in Washington State by participating Producers - See Section 5(a) of this Plan.
- (b) List of registered collection sites and locations, compared to the required locations by County and City. (see Appendix C)
- (c) Identification of transport, processing, and recycling services (see Sections 7 and 8).
- (d) Quantity and types of Program Products collected, transported, and processed. The total number of mercury-containing lights, estimated by weight in pounds using standard conversion factors (see Section 5(b)), collected from individual collection sites, collection services, curbside and mail back. It will also track the final destination of all lights recycled.
- (e) The Program will document education efforts for consumers, retailers, utilities, collectors, transporters and processors including assessments of the effectiveness of these efforts. Examples of education and outreach materials to promote the Program are included in Section 11.
- (f) The Program will document the efforts to promote the mercury-containing lights collection Program.
- (g) The annual report will identify the primary processor(s) for all lights processed through the Program as well as quantities and management method (reuse, recycling, disposal) for lighting components (aluminum, phosphor, mercury, glass).

Quantities of Program Products will be reported by Producers and Retailers to the Program monthly through an online portal and stored in a secure database. Collection information will also be reported by the processor to the Program on a monthly basis subject to verification by PCA. Other Program records such as registered Collection Sites and education and outreach efforts will be maintained by PCA. Informal reports summarizing collected Program information will be provided to Ecology on a quarterly basis.

IMPLEMENTATION TIMELINE

The plan must include a timeline showing when each of the following will occur and a detailed description of each activity including, but not limited to:

- (a) Start-up of the collection and processing efforts;
- (b) Education efforts for consumers, retailers, collectors, transporters, and processors;
- (c) Outreach efforts for the mercury-containing lights collection program; and
- (d) Continual progress toward collection of spent mercury-containing lights.

WAC 173-910-420 (8)

10.1 Timeline Overview

The following chart shows the anticipated timeline for the Program Plan, collection system, transportation and processing activities and education and outreach. Individual implementation tasks will be addressed in time periods marked with a bullet.

LightRecycle WA Program Implementation	May	June	July	Aug	Sept	Oct	Nov	Dec	2015
Product stewardship plan									
Consultation on Program Plan / respond to comments	•								
Submit Final Plan for approval		•							
Public Comment and resubmit to Ecology				•					
Conditional Approval					•				
Submit Final Plan Components					•	•	•		
Final Plan Approval								•	
Collection System									
Recruit collection sites	•	•	•	•	•	•	•	•	•
Prepare collection sites (equipment, signs, training)						•	•	•	•
Develop collection site manual			•	•					
Audit collection sites (as needed)									•

LightRecycle WA Program Implementation	May	June	July	Aug	Sept	Oct	Nov	Dec	2015
Collection system operational									•
Transportation and Processing									
Budgeting for transportation and processing costs	•								
Provide training to processors (tracking, standards, data)		•	•				•	•	•
Transportation and processing system operational								•	•
Education and outreach									
Develop communications strategy	•					•	•	•	
Program website development	•	•	•	•	•	•	•	•	
Identify local government, utilities and other partnership opportunities						•	•	•	
Work with stakeholders on communication strategies						•	•	•	•
Design and printing of Program brochure	•					•	•		
Distribution of brochures to retailers, collection sites etc.			•		•			•	
Retailer Webinar to explain EHC obligations					•				
Establish and manage social media platforms							•	•	•
Launch preliminary Website with Program information	•								
Launch collection site finder on web page									•

EDUCATION, PUBLIC OUTREACH AND MARKETING

A description of how the plan will meet the public education, outreach and marketing requirements, including:

- (a) How it will provide information about where and how to deliver their mercury-containing lights to a product stewardship program collector at the end of the product's life;
- (b) Providing a web site and toll-free number that gives information about the product stewardship program in sufficient detail regarding how and where to drop off mercury-containing lights into the product stewardship program, and collaborating with the department to provide information necessary to keep the 1-800-RECYCLE online data base up to date;
- (c) Describing the outreach method or methods used;
- (d) How it will ensure outreach to the public throughout the state;
- (e) How it will provide outreach materials for educating the public to all collectors used by the plan;
- (f) Explaining how the plan will coordinate education, public outreach, and marketing with other approved product stewardship plans;
- (g) Explaining how the plan will coordinate on education, public outreach, and marketing with retailers, distributors, wholesalers, and electric utilities; and
- (h) Explain the public review process implemented by the stewardship organization, the public comments received by the stewardship organization, and how the stewardship organization addressed those comments.

WAC 173-910-420(10)

11.1 Overview

PCA will develop a communication and outreach strategy designed to:

- Increase the number of mercury-containing lights recycled in Washington
- Publicize
 - The network of convenient, no-charge drop-off sites throughout the state
 - The legal obligation to properly recycle mercury-containing lights
 - The environmental benefits of recycling mercury-containing lights
- Comply with applicable Washington regulations

Phased Approach

The communication strategy will be developed in phases, starting with this overview and roadmap, and continuing through the Program launch on January 1, 2015. Although some elements of the communications strategy are known, many planning and information gathering activities will not occur until 2015, such as:

- **Hiring Marketing Vendors:** One or more firms will be engaged in the fourth quarter of 2014 and will contribute to the development of strategy, messaging, advertising, public relations, social media and other outreach activities.
- **Conducting Research Studies:** Two studies will be conducted, starting as soon as possible after the launch of the Program in January 2015. These studies will gather data on consumer awareness and behavior with regard to the use of, and attitudes towards, mercury-containing lights and recycling. These studies are likely to have an impact on the messaging and advertising mix of the Program.

Additionally, certain advertising buys will coincide with the launch of advertising campaigns that will begin near the end of the first quarter of 2015 or beginning of the second quarter of 2015. The make-up of advertising inventory for Web, print, outdoor and others may be different in 2015 than it is currently. In order to buy efficiently, the Program will research and purchase advertising over time, researching current opportunities, and seeking the best value to the extent possible, such as when media companies are competing for clients.

Lastly, the minimum 10-year time frame of the Program requires that the education and outreach efforts will be continually evaluated and adjusted to identify the messages, advertisements and campaigns that resonate more or less than others, and to emphasize the most effective elements of the overall communications effort.

Pre-launch Communication Activities

Prior to January 1, 2015, PCA will develop a basic set of marketing materials with a focus on Collection Sites and retailers. These pieces, all of which include Program branding, include the most basic elements of the education and outreach effort, such as:

- **Collection Site Signage**
 - “Recycle Here!” posters (indoor)
 - “Recycle Here!” banners (outdoor)
- **Information Postcards – 4” x 6” cards with basic information about the Program and a QR code that can be scanned with a smartphone to open a “Collection Site locator” Web application and designed to be taken home by consumers.**
 - Retail Shelf Talkers – placed near mercury-containing lights being sold at retail
 - Rack Cards – the initial marketing piece for the Program, produced for placement near retail cash registers and at LightRecycle Washington Collection Sites
- **Website: www.lightrecyclewa.org**
 - Pre-launch, this Website is a small information brochure with basic Program details and contact forms for consumers and potential collectors.

- The complete Website will be developed prior to 2015 in order to be ready on January 1, 2015. The Website will include a Collection Site locator (map) application and more detailed information about the Program. (See section 11.2 below.)
- Selection of marketing vendor(s) – LightRecycle Washington will research and request proposals from marketing and public relations firms in Washington State.
- Social Media: Most of the social media strategy will be planned and executed after the Program launch in 2015. However, a basic social media presence will be put in place in the fourth quarter of 2014.
- Press Release: When the Program begins on January 1, 2015, PCA will send out a Program launch press release and look into other ways to maximize initial media coverage.

Post-launch Communication Activities

With the new Program underway, much of the first quarter of 2015 will be spent planning the marketing communications and verifying that the collection system is functioning properly before seeking increased collection through advertising.

Although advertising may begin near the end of the first quarter of 2015, most of the Program advertising will occur in the second and third quarters of 2015. All campaigns will taper or end completely as the holiday season approaches in October. During November and December, LightRecycle will plan marketing activities for 2016. The following timeline shows an overview of the Communications Roadmap for 2015.

2015 Communications Roadmap			
Q1	Q2	Q3	Q4
Program launch press release			
Awareness study			
Consumer behaviour study			
Strategy development (earned media and advertising)			
Fine-tune messaging			
Research advertising, PR and promotion opportunities			
Plan advertising mix and specific campaigns			
Research non-traditional programs (e.g. college ambassador programs)			
Launch ad campaigns and other programs			
Research and buy Spanish-language advertising			
Launch promotional partnerships			
Expand social media activities			
Evaluate and adjust current campaigns			
Plan 2016 activities			

PCA will ensure outreach to the public throughout the state by:

- Providing signage and outreach materials at collection sites in every county and city of 10,000 residents or more.
- Providing marketing materials to over 2,000 retail locations that sell mercury-containing lamps.
- Conducting advertising campaigns that reach every part of the state.
- Maintaining a Website and social media presence that can be accessed in any part of the state.
- Conducting Spanish-language advertising campaigns.
- Placing press releases and actively seeking earned media opportunities.

11.2 Key Messages

PCA will provide information about recycling mercury-containing lights throughout Washington. Marketing materials will specifically address:

- The categories of lights that are accepted in the Program at no charge.
- How to find a Collection Site for mercury-containing lights.
- Drop-off limits for Washington residents.
- The law that prohibits disposing of mercury-containing lights in the solid waste stream.
- The hazards mercury can pose to human health and the environment.
- Proper handling and recycling methods for mercury-containing lights.
- The economic and environmental benefits of using and recycling mercury-containing lights.

As mentioned above, the messaging will be adjusted based on the awareness and consumer behavior studies that will be conducted in the first quarter of 2015 and by recommendations made by contracted marketing vendors.

11.3 LightRecycle Washington Website

The website www.lightrecyclewa.org will highlight key Program information such as the types and quantities of lights that can be recycled. The Collection Site locator web application is a key component of the website and a link to it will be prominently displayed on the home page. The locator app will allow users to enter a zip code or other information and then display LightRecycle Washington collection sites in the area both in text and on a map.

Other website content will include contact forms and information on:

- Program overview with links to the law and related information
- Product Stewardship and Light Recycling
- Broken Lights
- Consumer FAQ
- Becoming a Collection Site
- Downloadable brochure and graphics

Retailers and Collection Sites will be able to log into the website to perform certain functions including:

- Request transportation of Program materials
- Order Program supplies and marketing materials
- View previous requests for transportation, supplies and other materials

The website will also contain information for Producers and retailers to provide guidance on their obligations within the law, and information for how non-Participating producers can register with the Program.

Upgrades to the website will be performed on a rolling basis throughout 2014 and 2015. Marketing and promotion of the website will be an ongoing activity. A toll-free number will be displayed on the website and on printed marketing materials.

11.4 Program Branding

The following Logo, tagline and images will be used to maintain consistent Program branding.

LOGO AND GRPAHIC IMAGE ELEMENTS	DESCRIPTION
	<p>Logo always features the words “LightRecycle Washington” and a CFL icon with a circular arrow around it. The logo and icon are available in a variety of file formats for use in different applications.</p>

	CFL (Compact Fluorescent Light)
	Fluorescent Tubes
	HID (High Intensity Discharge)

11.5 Communication Channels

Communication will begin with earned media (press releases) and advertising at light retailers and collection sites through the use of info post cards and signage as previously discussed. PCA will collaborate with other entities in the development and implementation of public education, outreach, and marketing efforts. Paid advertising channels will be used to create consumer awareness. The communication program will include:

Website - see “LightRecycle Washington Website” above.

Earned Media – PCA will use press releases and public service announcements and other methods where possible to raise awareness of the Program and the benefits of recycling.

Paid Advertising – PCA will plan and execute a variety of paid advertising campaigns. The initial advertising mix will be determined in 2015 and may include radio, printed periodicals, outdoor, Internet and others.

Spanish Language Advertising – Spanish language marketing activities will be planned and are especially likely to occur in print, radio and social media.

Retail and Collector Materials – The most continuous component of the education and outreach element of the Program is the production and distribution of educational materials to Collection Sites and lighting retailers. Additional marketing materials can be downloaded or requested (at no charge) from the LightRecycle Washington website.

Partnerships - The Program will seek to partner with organizations interested in promoting LightRecycle Washington. Collaboration strategies will be developed through discussions with potential partners such as:

- **Other Stewardship Programs** - Opportunities to combine communication efforts with existing stewardship programs will be explored.
- **Municipal and County Partnerships** - The Program will seek opportunities to partner with local governments. These activities may include participating in community recycling events, partnering with local HHW collection programs and linking local government websites to the Program website.
- **Utilities** - Many utility companies have extensively promoted the use of energy efficient fluorescent lighting to their constituents and developed collection networks for recycling lights. The Program will investigate opportunities to work with utilities to reach target consumers, ensure consistent messaging and maximize collection.
- **Environmental Organizations** - These groups play an important role in supporting and promoting product stewardship programs. The Program will work with these entities to communicate the dangers and health impacts of mercury pollution and how to recycle mercury-containing lighting.
- **State** - Provide the Ecology-staffed 1-800-Recycle Hotline with Program and Collector information for their database so that the public can find collector locations. The Program will provide producer information to Ecology for their website. Retailers will be able to find an updated list of Participating Producers from the Ecology website.
- **Producers** - NEMA and Participating Producers will be encouraged to add Program information to their websites and promote the Program where possible.

Social Media - With input from social media experts, LightRecycle Washington will develop a social media strategy to promote the Program. PCA will also seek opportunities to promote the Program on existing social media sites that are managed by the Department of Ecology.

11.6 Public Review Process

As required in the rules (WAC 173-910-450), the Department of Ecology posted the initial Program Plan online for review by all stakeholders during a three-week period during June and July 2014. Ecology and PCA sought and gathered numerous comments throughout the state from lighting producers, policy experts, waste management professionals, Department of Ecology personnel and others. The comments were then organized by section and summarized in cases where multiple stakeholders made similar comments about a particular section or aspect of the Program Plan. Meetings, phone calls and conference calls were held between PCA and Ecology to discuss comments on the plan. Every comment was considered and many were specifically addressed in subsequent revisions of the Program Plan.

APPENDIX A - PARTICIPATING PRODUCERS AND BRANDS

The following list identifies the Producers who have sent a Letter of Intent to PCA indicating their intention to join the Program. PCA will continue to actively recruit all obligated Producers prior to the Program start.

List of Participating Producers

	Company Name and Website	Phone	Address
1	Ace Hardware Corporation www.acehardware.com	630-990-6600	2200 Kensington Court Oak Brook, IL 60523
2	Bulbrite Industries Inc. www.bulbrite.com	201-531-5900	145 W Commercial Avenue Moonachie, NJ 07074-1704
3	Casio America, Inc. www.casio.com	973-361-5400	570 Mt. Pleasant Avenue Dover, NJ 07801
4	Coleman Cable Inc. www.colemancable.com	800-323-9355	1530 Shields Drive Waukegan, IL 60085
5	Cree, Inc. www.cree.com	262-886-1900	9201 Washington Avenue Racine, WI 53406
6	Dolan Designs Inc. www.dolandesigns.com	503-220-0799	2730 NW Front Avenue Portland, OR 97210
7	Dolan Northwest LLC www.seattlelighting.com	503-972-5234	222 2nd Avenue Ext. South Seattle, WA 98134
8	EarthTronics, Inc. www.earthtronics.com	866-632-7840	380 W Western Ave., Suite #301 Muskegon, MI 49440
9	E-conolight LLC www.e-conolight.com	888-243-9445	1501 96th Street Sturtevant, WI 53177
10	Eiko-Global LLC www.eiko.com	913-441-8500	23220 West 84th Street Shawnee, KS 66227
11	Elong International USA Inc. (representing Do it Best Corp) www.elonginternational.com	972-247-7996	2425 Mclver Lane #150 Carrollton, TX 75006
12	Eye Lighting International of North America, Inc. www.eyelighting.com	440-350-7000	9150 Hendricks Rd. Mentor, OH 44060
13	Feit Electric Company, Inc. www.feit.com	562-463- 2852	4901 Gregg Rd. Pico Rivera, CA 90660

	Company Name and Website	Phone	Address
14	Future Harvest Development Ltd. www.futureharvest.com	866-491-0255	725 Evans Court, Kelowna, BC Canada V1X 6G4
15	Gavita (representing Gavita Nederland and Gavita Holland) www.gavita-holland.com www.gavita.nl/	+31 (0)297 380450	Oosteinderweg 127 1432 AH Aalsmeer The Netherlands
16	General Electric Lighting www.gelighting.com	216-266-9729	1975 Noble Rd East Cleveland, OH 44112
17	Halco Lighting Technologies www.halcolighting.com	770-242-3612	PO Box 2834 Norcross, GA 30091-2834
18	Havells USA www.havells-usa.com	678-420-3700	125 Villanova Drive, Suite A/B Atlanta, GA 30336
19	LD Kichler Co. www.kichler.com	216-573-1000	7711 E. Pleasant Valley Rd. Cleveland, OH 44131-8010
20	Lights of America, Inc www.lightsofamerica.com	909-594-7883	611 Reyes Drive Walnut CA 91789
21	Litetronics International, Inc. www.litetronics.com	708-389-8000	235 East 171 Street Harvey, IL 60426
22	Lucidity Lights, Inc. www.finallybulbs.com	440-622-1656	One Broadway, Floor 14 Cambridge, MA 02142
23	Maxlite Inc. www.maxlite.com	973-244-7300	12 York Ave. West Caldwell, NJ 07006
24	OSRAM SYLVANIA www.sylvania.com	978-777-1900	100 Endicott St. Danvers, MA 01923
25	OttLite Technologies, Inc www.ottlite.com	800-842-8848	220 W 7th Ave, Suite 100 Tampa FL 33602
26	Philips Lighting North America Corporation www.usa.philips.com	202-962-8567	200 Franklin Square Somerset, NJ 08873
27	Satco Products, Inc. www.satco.com	631-243-2022	110 Heartland Blvd. Brentwood, NY 11717
28	Sunleaves Garden Products www.sunleaves.com	800-316-1306	7854 N. State Road 37 Bloomington, IN 47404
29	Sunlight Supply, Inc. www.sunlightsupply.com	888-478-6544	5408 NE 88th St., Bldg. A Vancouver, WA 98665
30	Sunlite (Sunshine Lighting) www.sunlite.com	718-768-7000	744 Clinton Street Brooklyn NY 11231
31	Technical Consumer Products Inc. www.tcpi.com	800-324-1496	325 Campus Drive Aurora, OH 44202
32	Uninex International (Unicorp) www.uninex.com	323-890-9246	5780 Smithway St Commerce, CA 90040

	Company Name and Website	Phone	Address
33	Ushio America, Inc. www.ushio.com	714-236-8600	5440 Cerritos Avenue Cypress, CA 90630
34	Venture Lighting International, Inc. www.venturelighting.com	800-451-2606	32000 Aurora Road - Suite A Solon, Ohio 44139
35	Verilux, Inc. www.verilux.com	802-496-3101	340 Mad River Park, Suite #1 Waitsfield, VT 05673
36	Westinghouse Lighting Corporation www.westinghouselighting.com	215-671-2000	12401 McNulty Road Philadelphia, PA 19154

List of Brands Represented

1. ACE
2. AllStart
3. ALTO
4. BEST CHOICE
5. BRIGHT EFFECTS
6. Bulbrite
7. Casio
8. Ceramalux Agro, Horticulture and HORTI
9. Coleman Cable
10. CVS
11. Designers Edge
12. Destination Lighting
13. Digimax
14. Do it Best
15. Dolan Designs
16. DOLLAR GENERAL
17. EarthBulb CFL
18. e-conolight
19. Ecosmart
20. Eiko
21. Energy Advantage
22. Energy Saver
23. ENERGY SMART
24. EVERYDAY LIVING
25. Eye
26. Eye Hortilux
27. Feit Electric
28. Finally
29. Gavita
30. GE
31. GE Lighting Linear Fluorescent and Compact Fluorescent Lamps
32. Halco
33. Havells USA
34. Kichler Lighting
35. KLITE
36. Lights of America
37. Litetronics
38. LUMA
39. Master
40. Master SDW White SON
41. MasterColor
42. MaxLite
43. Natural Spectrum
44. OptiLUME
45. Osram
46. Ottlite
47. Philips
48. Pioneer
49. ProLime
50. RITE-AID
51. RUDD Lighting Direct
52. RUUD
53. RUUD Lighting
54. Safeway – Bright Green
55. Satco
56. Satco / HYGRADE
57. SMART LIVING
58. Soraa
59. Spectralux
60. Sunblaster Lighting
61. Sunlite
62. Super Sprouter
63. Sylvania
64. TCP
65. Tospo Brand Lamps
66. TuffGuard
67. Ultra Sun
68. Ushio
69. Utilitech
70. Venture Lighting
71. Verilux
72. VitaLUME
73. VitaPlant
74. Walgreen - Living Solutions
75. Western Family
76. Westinghouse
77. Westpointe CFL
78. Woods
79. Zoo

APPENDIX B – 5 YEAR BUDGET

Program Revenues

	2015	2016	2017	2018	2019	Total 5 Year Revenues
Total Units Sold	7,968,000	7,857,600	7,749,408	7,643,380	7,539,472	38,757,860
Environmental Handling Charge	\$ 0.25	\$ 0.25	\$ 0.25	\$ 0.25	\$ 0.25	
Total Revenue	1,992,000	1,964,400	1,937,352	1,910,845	1,884,868	9,689,465

Program Expenses

	2015	2016	2017	2018	2019	Total 5 Year Expenses
Operational Expenses	923,332	964,231	983,017	1,007,056	1,018,631	4,896,267
General Communications	37,500	16,500	16,500	16,500	16,500	103,500
Media and Advertising	150,750	132,850	150,058	109,250	112,250	655,158
Collection / Retailer Promo Material	41,756	8,641	13,281	8,924	9,072	81,674
General Administration	424,764	252,580	257,632	262,784	268,040	1,465,800
Legal, Insurance, Bank Charges	57,023	40,763	41,518	39,289	40,075	218,667
Audits and Reporting Expenses	97,000	102,400	103,008	103,628	104,261	510,297
Ecology Annual Fees	175,000	165,000	155,000	145,000	135,000	775,000
Total Expenses	1,907,124	1,682,966	1,720,014	1,692,431	1,703,828	8,706,363

Surplus (Reserve)	84,876	281,434	217,338	218,414	181,040
Cumulative Reserve	84,876	366,310	583,648	802,062	983,102

APPENDIX C – COLLECTION SITE LOCATIONS

Collection Site Location Requirements

The following table shows the number of registered Collections Sites by county and city. The number of Sites meeting the requirements of the law for Collection Sites (1 per county and 1 per city with a population over 10,000) are under the heading "# Sites (Accepts ALL)".

The number of Sites under the heading "# Sites, (CFL Only)" do not meet the collection site requirement in the law since they do not accept all Program Products, however they accept CFLs only.

Locations with the letters "CE" under the heading "Collection Events" indicate sites in which two collection events (per location) are planned for 2015 unless a Collection Site can be registered for that area before the collection events are scheduled.

	County	City	Size	# Sites (Accepts ALL)	# Sites (CFL Only)	Collection Events
1	Adams	county location	no city > 10K	CE		CE
2	Asotin	county location	no city > 10K	1		
	Benton	[Benton]	< 10K	1		
3	Benton	Kennewick	76,762	2		
4	Benton	Richland	52,413	2		
5	Benton	West Richland	13,003	CE		CE
	Chelan	[Chelan]	< 10K	1		
6	Chelan	Wenatchee	32,701	1		
	Clallam	[Sequim]	< 10K	1		
7	Clallam	Port Angeles	19,190	2		
8	Clark	Battle Ground	18,305	1		
9	Clark	Camas	20,907	CE		CE
10	Clark	Vancouver	167,405	7		
11	Clark	Washougal	14,750	1		
12	Columbia	county location	no city > 10K	1		
13	Cowlitz	Kelso	11,810	CE		CE

	County	City	Size	# Sites (Accepts ALL)	# Sites (CFL Only)	Collection Events
14	Cowlitz	Longview	36,530	1		
15	Douglas	East Wenatchee	13,477	3		
16	Ferry	county location	no city > 10K	1		
17	Franklin	Pasco	67,599	2		
18	Garfield	county location	no city > 10K	1		
19	Grant	Moses Lake	21,360	CE		CE
	Grant	[Mattawa]	< 10K	1		
20	Grays Harbor	Aberdeen	16,371	1		
	Island	[Camano Island]	< 10K	1		
	Island	[Coupeville]	< 10K	1		
	Island	[Langley]	< 10K	1		
21	Island	Oak Harbor	22,136	2		
22	Jefferson	county location	no city > 10K	1		
23	King	Auburn	74,860	1	1	
24	King	Bellevue	133,992	5	4	
25	King	Bothell	35,579	CE	2	CE
26	King	Burien	49,858	CE	1	CE
27	King	Covington	18,830	CE		CE
28	King	Des Moines	30,687	1	2	
29	King	Enumclaw	11,479	1		
30	King	Federal Way	92,734	1		
31	King	Issaquah	32,566	1	1	
32	King	Kenmore	21,611	CE		CE
33	King	Kent	124,435	CE	1	CE
34	King	Kirkland	84,430	2	4	
35	King	Lake Forest Park	13,091	1		
36	King	Maple Valley	24,804	1	1	
37	King	Mercer Island	24,098	1		
38	King	Newcastle	11,062	CE	1	CE
	King	[North Bend]	< 10K	1	1	
39	King	Redmond	57,530	CE	2	CE
40	King	Renton	97,003	2	2	
41	King	Sammamish	50,169	CE	1	CE
42	King	SeaTac	27,875	CE		CE
43	King	Seattle	652,405	7	21	
44	King	Shoreline	54,790	1	1	

	County	City	Size	# Sites (Accepts ALL)	# Sites (CFL Only)	Collection Events
45	King	Snoqualmie	12,018	CE		CE
46	King	Tukwila	19,765	3	1	
47	King	Woodinville	11,318	1		
	King	[Vashon]	< 10K	1		
48	Kitsap	Bainbridge Island	23,196	1		
49	Kitsap	Bremerton	39,056	CE		CE
50	Kitsap	Port Orchard	12,959	CE		CE
	Kitsap	[Poulsbo]	< 10K	1		
	Kitsap	[Silverdale]	< 10K	1		
51	Kittitas	Ellensburg	18,363	1		
52	Klickitat	county location	no city > 10K	1		
53	Lewis	Centralia	16,660	1		
54	Lincoln	county location	no city > 10K	CE		CE
55	Mason	county location	no city > 10K	2		
56	Okanogan	county location	no city > 10K	1		
57	Pacific	county location	no city > 10K	1		
58	Pend Oreille	county location	no city > 10K	CE		CE
59	Pierce	Bonney Lake	18,289	CE		CE
60	Pierce	Lakewood	59,097	1		
61	Pierce	Puyallup	38,609	1		
62	Pierce	Tacoma	203,446	3	1	
63	Pierce	University Place	32,040	CE	1	CE
	Pierce	[Graham]	< 10K	1		
	Pierce	[Gig Harbor]	< 10K	1	1	
64	San Juan	county location	no city > 10K	4		
65	Skagit	Anacortes	16,048	1		
66	Skagit	Mount Vernon	32,600	CE		CE
67	Skagit	Sedro-Woolley	10,645	1		
	Skagit	[Burlington]	< 10K	1		
68	Skamania	county location	no city > 10K	3		
69	Snohomish	Arlington	18,664	1		
70	Snohomish	Edmonds	40,727	CE	1	CE
71	Snohomish	Everett	105,370	6	3	
72	Snohomish	Lake Stevens	29,949	1	1	
73	Snohomish	Lynnwood	36,485	2	2	
74	Snohomish	Marysville	63,269	CE	1	CE

	County	City	Size	# Sites (Accepts ALL)	# Sites (CFL Only)	Collection Events
75	Snohomish	Mill Creek	18,828	CE		CE
76	Snohomish	Monroe	17,724	CE		CE
77	Snohomish	Mountlake Terrace	20,674	1	1	
78	Snohomish	Mukilteo	20,860	1		
	Snohomish	[Snohomish]	< 10K	1	1	
	Snohomish	[Stanwood]	< 10K		1	
	Snohomish	[Sultan]	< 10K	1		
	Snohomish	[Granite Falls]	< 10K	1		
79	Spokane	Cheney	11,251	CE		CE
	Spokane	[Deer Park]	< 10K	1		
80	Spokane	Spokane	210,721	3		
81	Spokane	Spokane Valley	91,113	1		
82	Stevens	county location	no city > 10K	1		
83	Thurston	Lacey	44,919	1		
84	Thurston	Olympia	48,338	2		
85	Thurston	Tumwater	18,511	1		
86	Wahkiakum	county location	no city > 10K	CE		CE
87	Walla Walla	Walla Walla	31,825	2		
88	Whatcom	Bellingham	82,631	3		
	Whatcom	[Blaine]	< 10K	2		
89	Whatcom	Ferndale	12,343	1		
90	Whatcom	Lynden	12,902	CE		CE
91	Whitman	Pullman	31,395	1		
92	Yakima	Grandview	11,117	1		
93	Yakima	Sunnyside	16,066	CE		CE
94	Yakima	Yakima	93,257	CE		CE
TOTAL				130	61	30

Registered Collection Sites

As of December 1, 2014, the following Collection Sites have registered with the Program. Collection of Program Products will begin on January 1, 2015.

Registered Collection Sites (by county and city) who will accept all Program Products:

#	Collection Site Name	Street Address	County	City	State	ZIP
1	Asotin County Regional Landfill	2901 6th Avenue	Asotin	Clarkston	WA	99403
2	Patnode's True Value	600 9th St.	Benton	Benton City	WA	99320
3	Batteries Plus Bulbs	321 North Columbia Center Blvd.	Benton	Kennewick	WA	99336
4	Kennewick Ace Hardware and Sporting Goods	2831 W Kennewick Ave.	Benton	Kennewick	WA	99336
5	Grigg's Department Store Ace Hardware	1415 George Washington Way	Benton	Richland	WA	99354
6	Ace Hardware and Sporting Goods on Keene Road	103 Keene Road	Benton	Richland	WA	99352
7	Lake Chelan Lighting Center	917 E Woodin Ave	Chelan	Chelan	WA	98816
8	Stan's Merry Mart	733 S. Wenatchee Ave.	Chelan	Wenatchee	WA	98801
9	Thurman Supply	1807 East Front Street	Clallam	Port Angeles	WA	98362
10	Around Again	2604 W 18th St.	Clallam	Port Angeles	WA	98362
11	Around Again	22 Gilbert Rd.	Clallam	Sequim	WA	98382
12	Hi-School Ace Hardware	1605 W. Main Street	Clark	Battle Ground	WA	98604
13	Fibin's Ace Hardware	809 NE Minnehaha St.	Clark	Vancouver	WA	98665
14	Parkrose Hardware	16509 SE 1st St.	Clark	Vancouver	WA	98684
15	Globe Lighting	809 NE Minnehaha ^{3/4}	Clark	Vancouver	WA	98665
16	Batteries Plus Bulbs	1218 NE 88th St. Suite 120	Clark	Vancouver	WA	97665
17	Batteries Plus Bulbs	2100 SE 164th Ave. Suite A103	Clark	Vancouver	WA	98683
18	Clark Public Utilities - Operations Office	8600 NE 117 Ave.	Clark	Vancouver	WA	98662
19	Clark Public Utilities - Electric Center	1200 Fort Vancouver Way	Clark	Vancouver	WA	98663

#	Collection Site Name	Street Address	County	City	State	ZIP
20	Washougal Hardware	1822 Main St.	Clark	Washougal	WA	98671
21	Columbia County Transfer Station	501 S Cottonwood Street	Columbia	Dayton	WA	99328
22	Longview Ace Hardware	600 Triangle Mall	Cowlitz	Longview	WA	98632
23	City of Bridgeport	1007 Fairview Ave.	Douglas	Bridgeport	WA	98813
24	Town of Mansfield	Railroad	Douglas	Mansfield	WA	98830
25	Rock Island Community Recycling Center	23 S Garden Ave.	Douglas	Rock Island	WA	98850
26	Ferry County Public Works - Solid Waste Div.	584 Torboy Dump Road	Ferry	Republic	WA	99166
27	Grigg's Department Store Ace Hardware	801 W Columbia St	Franklin	Pasco	WA	99301
28	Garfield County Public Works	19th and Arlington	Garfield	Pomeroy	WA	99347
29	Marty's True Value Hardware	205 E First Street	Grant	Mattawa	WA	99349
30	LeMay's Central Transfer Station	4201 Olympic Highway	Grays Harbor	Aberdeen	WA	98520
31	Camano Island Transfer Station	75 E. Camano Hill Road	Island	Camano Island	WA	98282
32	Coupeville Solid Waste Complex	20018 State Highway 20	Island	Coupeville	WA	98239
33	Bayview Solid Waste Dropbox and Recycle Park	5790 S. Kramer Road	Island	Langley	WA	98260
34	Oak Harbor Ace Hardware	150 SE Pioneer Way	Island	Oak Harbor	WA	98277
35	North Whidbey Solid Waste Dropbox and Recycle Park	3151 Oak Harbor Road	Island	Oak Harbor	WA	98277
36	Jefferson County Household Hazardous Waste Collection Facility	282 10th St., Bldg 19	Jefferson	Port Townsend	WA	98368
37	Agrishop Auburn Ace Hardware	308 West Main	King	Auburn	WA	98001
38	Crossroads Ace Hardware	653 156th Ave. NE	King	Bellevue	WA	98008
39	Seattle Lighting	14505 NE 20th St.	King	Bellevue	WA	98007
40	Batteries Plus Bulbs	14917 NE 20th St.	King	Bellevue	WA	98007
41	Batteries Plus Bulbs	12816 SE 38th St.	King	Bellevue	WA	98006
42	PC Recycle and Repair	13107 NE 20th St., Suite 2	King	Bellevue	WA	98005

#	Collection Site Name	Street Address	County	City	State	ZIP
43	Redondo Ace Hardware	27073 Pacific Highway South	King	Des Moines	WA	98198
44	Enumclaw Recycling and Transfer Station	1650 Battersby Ave E	King	Enumclaw	WA	98022
45	Northshore Ace Hardware	35419 21ST Ave. S.W.	King	Federal Way	WA	98023
46	Recolgy CleanScapes	317 NW Gilman Road #22	King	Issaquah	WA	98027
47	Kirkland City Hall	123 5th Ave	King	Kirkland	WA	98033
48	Bridal Trails Ace Hardware	6613 132 AVE N.E.	King	Kirkland	WA	98033
49	Town Center Hardware	17171 Bothell Way NE	King	Lake Forest Park	WA	98155
50	Johnsons Home and Garden	26625 Maple Valley Black Diamond Rd.	King	Maple Valley	WA	98038
51	Mercer Island True Value Hardware	7707 SE 27th St. Suite 110	King	Mercer Island	WA	98040
52	North Bend Ace Hardware	330 Main Ave. S	King	North Bend	WA	98045
53	Fairwood Ace Hardware	14100 SE Petrovitsky Road	King	Renton	WA	98058
54	Highlands Ace Hardware	4601 NE Sunset Blvd	King	Renton	WA	98059
55	North Seattle Household Hazardous Waste Collection Facility	12550 Stone Avenue North	King	Seattle	WA	98133
56	South Seattle Household Hazardous Waste Collection Facility	8100 2nd Avenue South	King	Seattle	WA	98108
57	Seattle Lighting	26 S. Hanford	King	Seattle	WA	98134
58	Seattle Lighting	222 2nd Ave. Ext. S.	King	Seattle	WA	98104
59	Batteries Plus Bulbs	536 NE Northgate Way	King	Seattle	WA	98125
60	Maple Leaf Ace Hardware	9000 Roosevelt Way NE	King	Seattle	WA	98115
61	Stoneway Hardware Ballard	4910 15th Ave NW	King	Seattle	WA	98107
62	Shoreline Recycling and Transfer Station	2300 N 165th Street	King	Shoreline	WA	98133
63	Seattle Lighting	300 Andover Park W¼	King	Tukwila	WA	98188
64	Batteries Plus Bulbs	17065 Southcenter Parkway	King	Tukwila	WA	98188
65	Bow Lake Recycling and Transfer Station	18800 Orillia Road S	King	Tukwila	WA	98188

#	Collection Site Name	Street Address	County	City	State	ZIP
66	Vashon Recycling and Transfer Station	18900 Westside Hwy SW	King	Vashon	WA	98070
67	PC Recycle and Repair	5817 238th St. SE, Suite 4	King	Woodinville	WA	98072
68	Bainbridge Island Ace Hardware	635 High School Road NE	Kitsap	Bainbridge Island	WA	98110
69	James Lumber and Ace Hardware	19801 Viking Ave.	Kitsap	Poulsbo	WA	98310
70	Seattle Lighting	10876 Myhre Place	Kitsap	Silverdale	WA	98383
71	Woods Ace Hardware	310 North Pearl Street	Kittitas	Ellensburg	WA	98926
72	Allyns Building Center	517 N Mill St.	Klickitat	Goldendale	WA	98620
73	Lewis County Solid Waste	1411 So Tower Ave.	Lewis	Centralia	WA	98531
74	Kitsap Lumber and Hardware	450 National Ave. S	Mason	Belfair	WA	98312
75	Tozier Brothers Ace Hardware	110 Mill St.	Mason	Shelton	WA	98584
76	Methow Recycles	12 Twisp Airport Road	Okanogan	Okanogan	WA	98856
77	Pacific County Household Hazardous Waste Facility	318 N Second St.	Pacific	Long Beach	WA	98631
78	Ace Hardware	4816 Pt. Fosdick Dr. NW	Pierce	Gig Harbor	WA	98335
79	Graham Ace Hardware	9807 224TH ST E SUITE 108	Pierce	Graham	WA	98338
80	Lakewood Ace Hardware	8123 Steilacoom Blvd. SW	Pierce	Lakewood	WA	98498
81	Batteries Plus Bulbs	10210 123rd St. Ct. E	Pierce	Puyallup	WA	98374
82	Seattle Lighting	6710 Tacoma Mall Blvd.	Pierce	Tacoma	WA	98409
83	Batteries Plus Bulbs	4027 Tacoma Mall Blvd.	Pierce	Tacoma	WA	98409
84	Lincoln Hardware	3726 South G Street	Pierce	Tacoma	WA	98418
85	The Exchange/Orcas Recycling Services	3398 Orcas Road	San Juan	Eastsound	WA	98245
86	CT Recycling	6739 Roche Harbor Road	San Juan	Friday Harbor	WA	98250
87	Ace Hardware of Friday Harbor	340 Argyle Avenue	San Juan	Friday Harbor	WA	98250
88	Lopez Solid Waste	2449 Fisherman Bay Road	San Juan	Lopez Island	WA	98261
89	Ace Hardware of Anacortes	1720 "Q" Avenue	Skagit	Anacortes	WA	98221
90	Chuckanut Lighting	938 Fountain St.	Skagit	Burlington	WA	98233

#	Collection Site Name	Street Address	County	City	State	ZIP
91	City Recycling Center	315 Sterling Street	Skagit	Sedro-Woolley	WA	98284
92	Stevenson Transfer Facility	1332 Ryan Allen Rd.	Skamania	Stevenson	WA	98648
93	Underwood Transfer Facility	1402 Little Buck Creek Rd.	Skamania	Underwood	WA	98650
94	Mt. Pleasant Transfer Facility	1111 MT. Pleasant Rd.	Skamania	Washougal	WA	98671
95	Batteries Plus Bulbs	4028 196th St. SW	Snohiomish	Lynnwood	WA	98036
96	North County Recycling & Transfer Station	19600 63rd Ave. NE	Snohomish	Arlington	WA	98223
97	Ace Hardware of Silver Lake	11014 19th Avenue SE Ste. 100	Snohomish	Everett	WA	98208
98	Ace Hardware of Evergreen Way	4835 Evergreen Way	Snohomish	Everett	WA	98203
99	Seattle Lighting	1811 Hewitt Avenue	Snohomish	Everett	WA	98201
100	Batteries Plus Bulbs	909 SE Everett Mall Way	Snohomish	Everett	WA	98208
101	Household Hazardous Waste Drop-off Station	3434 McDougall Ave.	Snohomish	Everett	WA	98201
102	Airport Road Recycling & Transfer Station	10700 Minuteman Dr.	Snohomish	Everett	WA	98204
103	Granite Falls Neighborhood Recycling & Disposal Center	7526 Menzel Lake Road	Snohomish	Granite Falls	WA	98252
104	Ace Hardware	303 91st Ave NE	Snohomish	Lake Stevens	WA	98258
105	PC Recycle and Repair	4520 200th ST. SW	Snohomish	Lynnwood	WA	98036
106	Southwest Recycling & Transfer Station	21311 61st Place West	Snohomish	Mountlake Terrace	WA	98043
107	Mukilteo Ace Hardware	12680 Mukilteo Speedway	Snohomish	Mukilteo	WA	98275
108	Dubuque Road Neighborhood Recycling & Disposal Center	19619 Dubuque Road	Snohomish	Snohomish	WA	98290
109	Sultan Neighborhood Recycling & Disposal Center	33014 Cascade View Drive	Snohomish	Sultan	WA	98294
110	Deer Park Ace Hardware	141 West H Street	Spokane	Deer Park	WA	99006
111	Batteries Plus Bulbs	7704 North Division Suite C	Spokane	Spokane	WA	99208
112	Batteries Plus Bulbs	11101 East Sprague	Spokane	Spokane	WA	99206
113	Miller's Hardware	2908 E. 29th Ave	Spokane	Spokane	WA	99223

#	Collection Site Name	Street Address	County	City	State	ZIP
114	Spokane Valley Ace Hardware	15405 E. Sprauge Ave	Spokane	Spokane Valley	WA	99037
115	Sety's Ace Hardware	301 E. Main	Stevens	Chewelah	WA	99109
116	Thurston County Hazohouse	2420 Hogum Bay Rd NE	Thurston	Lacey	WA	98516
117	Olympia Ace Hardware	400 Cooper Point Road	Thurston	Olympia	WA	98502
118	Batteries Plus Bulbs	2905 Capital Mall Dr. SW	Thurston	Olympia	WA	98502
119	Lincoln Creek Lumber/Ace Hardware	2421 93rd Ave SW	Thurston	Tumwater	WA	98512
120	Sudbury Regional Landfill, City of Walla Walla	414 Landfill Rd.	Walla Walla	Walla Walla	WA	99362
121	Batteries Plus Bulbs	632 South 9th Ave.	Walla Walla	Walla Walla	WA	99362
122	Whatcom County Disposal of Toxics Facility	3505 Airport Drive	Whatcom	Bellingham	WA	98226
123	Bellingham Ace Hardware	356 36th St.	Whatcom	Bellingham	WA	98225
124	Sanitary Service	1001 Roeder Ave.	Whatcom	Bellingham	WA	98225
125	WFC Fairhaven True Value	3125 Old Fairhaven Parkway	Whatcom	Bellingham	WA	98225
126	Pacific Building Center - True Value Hardware	2677 Bell Road	Whatcom	Blaine	WA	98230
127	WFC Blaine Ace Hardware	1733 H Street Suite 700	Whatcom	Blaine	WA	98230
128	Ferndale Ace Hardware	5715 4th Ave.	Whatcom	Ferndale	WA	98248
129	Whitman County Public Works Solid Waste Facility	252 Landfill Road	Whitman	Pullman	WA	99163
130	Grandview Ace Hardware	224 Division St.	Yakima	Grandview	WA	98930

Registered Collection Sites (by county) who will accept CFLs only:

#	Collection Site Name	Street Address	County	City	State	ZIP
1	Bartell Drugs Auburn	3902 "A" St. S.E.	King	Auburn	WA	98002-8610
2	Bartell Drugs Factoria	3620 Factoria Blvd. SE	King	Bellevue	WA	98006-6128
3	Bartell Drugs Bellevue-Midlakes	11919 NE 8th St.	King	Bellevue	WA	98005-3023
4	Bartell Drugs Bellevue Village	10116 NE 8th Street	King	Bellevue	WA	98004-4148
5	Bartell Drugs Crossroads (24 Hr)	653 156th Ave NE	King	Bellevue	WA	98007-4823
6	Bartell Drugs Burien	14901 4th Ave SW, Suite 100	King	Burien	WA	98166-1906
7	Bartell Drugs Des Moines	21615 Pacific Hwy S.	King	Des Moines	WA	98198-7703
8	Bartell Drugs Redondo	27055 Pacific Hwy S.	King	Des Moines	WA	98198-9250
9	Bartell Drugs Issaquah	5700 East Lake Sammamish Pkwy SE	King	Issaquah	WA	98029-8914
10	Bartell Drugs Lake Meridian	12946 SE Kent-Kangley Rd.	King	Kent	WA	98030-7940
11	Bartell Drugs Kingsgate	14442 124th Ave. N.E.	King	Kirkland	WA	98034-4801
12	Bartell Drugs Bridle Trails	6619 132nd Ave. N.E.	King	Kirkland	WA	98033-8627
13	Bartell Drugs Inglewood	14130 Juanita Dr. N.E Ste. 107	King	Kirkland	WA	98034-0127
14	Bartell Drugs Houghton	10625 N.E. 68th	King	Kirkland	WA	98033-7054
15	Bartell Drugs Maple Valley	22117 SE 237th St.	King	Maple Valley	WA	98038-8533
16	Bartell Drugs Coal Creek Village	6939 Coal Creek Pkwy S.E.	King	Newcastle	WA	98059-3137
17	Bartell Drugs North Bend	248 Bendigo Boulevard South	King	North Bend	WA	98045

#	Collection Site Name	Street Address	County	City	State	ZIP
18	Bartell Drugs Redmond Bella Bottega	8862 161st Ave NE, Suite 102	King	Redmond	WA	98052-7553
19	Bartell Drugs Redmond Town Center	7370 170th Ave NE	King	Redmond	WA	98052-4457
20	Bartell Drugs Renton Highlands	4700 NE 4th Street	King	Renton	WA	98059-4800
21	Bartell Drugs Fairwood	17254 140th Ave SE	King	Renton	WA	98058-7014
22	Bartell Drugs Sammamish	526 228th Ave. N.E.	King	Sammamish	WA	98074-7226
23	Bartell Drugs Downtown	1628 Fifth Avenue	King	Seattle	WA	98101-1606
24	Bartell Drugs Market & 15th Ballard	1500 NW Market Street, Suite 101	King	Seattle	WA	98107-5211
25	Bartell Drugs Ballard	5605 22nd Ave. N.W.	King	Seattle	WA	98107-3119
26	Bartell Drugs White Center	9600 15th Ave. S.W.	King	Seattle	WA	98106-2820
27	Bartell Drugs Greenwood	100 N 85th St.	King	Seattle	WA	98103-3602
28	Bartell Drugs Boren & Madison	1101 Madison St.	King	Seattle	WA	98104-1306
29	Bartell Drugs University Way	4344 University Way N.E.	King	Seattle	WA	98105-5809
30	Bartell Drugs Wallingford	1820 N 45th St.	King	Seattle	WA	98103-6803
31	Bartell Drugs West Seattle	4706 42nd Ave. S.W.	King	Seattle	WA	98116-4500
32	Bartell Drugs Broadway & Pike	1407 Broadway Ave.	King	Seattle	WA	98122-3854
33	Bartell Drugs Roosevelt Square	6401 12th Ave NE	King	Seattle	WA	98115-6754
34	Bartell Drugs University Village	2700 NE University Village St.	King	Seattle	WA	98105-5016

#	Collection Site Name	Street Address	County	City	State	ZIP
35	Bartell Drugs South Lake Union	1001 Mercer Street	King	Seattle	WA	98109-4234
36	Bartell Drugs 3rd and Union	1404 Third Ave.	King	Seattle	WA	98101-2106
37	Bartell Drugs Magnolia	2222 32nd Ave. W.	King	Seattle	WA	98199-4044
38	Bartell Drugs Queen Anne (24 Hr)	600 First Ave. N.	King	Seattle	WA	98109-4001
39	Bartell Drugs Admiral Way	2345-42nd Avenue SW	King	Seattle	WA	98116-2513
40	Bartell Drugs Fourth & Madison	910 Fourth Ave	King	Seattle	WA	98164-1000
41	Bartell Drugs Rainier Avenue	2345 Rainier Ave. South	King	Seattle	WA	98144-5348
42	Bartell Drugs Lake City	3018 NE 125th Street	King	Seattle	WA	98125-4424
43	Bartell Drugs Upper Queen Anne	1929 Queen Anne Ave. N	King	Seattle	WA	98109-2549
44	Bartell Drugs 185th and Aurora	18420 Aurora Ave N	King	Shoreline	WA	98133-4416
45	Bartell Drugs Riverton Heights	14277 Pacific Hwy. S.	King	Tukwila	WA	98168-4124
46	Bartell Drugs Gig Harbor	5500 Olympic Drive	Pierce	Gig Harbor	WA	98335-1487
47	Bartell Drugs Tacoma	3601 6th Ave S	Pierce	Tacoma	WA	98406-5405
48	Bartell Drugs University Place	2700 Bridgeport Wy W Suite D	Pierce	University Place	WA	98466-4600
49	Bartell Drugs Canyon Park	22833 Bothell-Everett Hwy	Snohomish	Bothell	WA	98021-9385
50	Bartell Drugs Mill Creek	18001 Bothell-Everett Hwy, Suite 101	Snohomish	Bothell	WA	98012-1660
51	Bartell Drugs Edmonds	23028 100th Ave W.	Snohomish	Edmonds	WA	98020-5080
52	Bartell Drugs Silver Lake	11020 19th Ave. S.E.	Snohomish	Everett	WA	98208-5155

#	Collection Site Name	Street Address	County	City	State	ZIP
53	Bartell Drugs Broadway	1825 Broadway	Snohomish	Everett	WA	98201-2348
54	Bartell Drugs Seattle Hill Road	5006 132nd ST SE Building A	Snohomish	Everett	WA	98208-9517
55	Bartell Drugs Frontier Village	621 SR9 N.E.	Snohomish	Lake Stevens	WA	98258-8525
56	Bartell Drugs Lynnwood	17633 Highway 99	Snohomish	Lynnwood	WA	98037-3627
57	Bartell Drugs Lake Serene	3625 148th St., SW, Suite B	Snohomish	Lynnwood	WA	98087-5522
58	Bartell Drugs Marysville	6602 64th Street NE	Snohomish	Marysville	WA	98270-4834
59	Bartell Drugs Mountlake Terrace	22803 44th Ave. W.	Snohomish	Mountlake Terrace	WA	98043-5032
60	Bartell Drugs Snohomish	1115 13th St.	Snohomish	Snohomish	WA	98290-2012
61	Bartell Drugs Stanwood	7205 267th St. NW	Snohomish	Stanwood	WA	98292-6237

APPENDIX D – COLLECTION SITE GUIDELINE

The following pages show the Collection Site Guideline provided to Collection Sites as of December 1, 2014. The Program may change the Collection Site Guideline, supplies and marketing materials over the course of the Program. When the Collection Site Guideline is revised, Collection Sites will be notified and provided with an updated copy. The most up to date version of the Collection Site Guideline can also be downloaded at this Web address:

www.lightrecyclewa.org/collection_site_guideline

APPENDIX E – COLLECTION SITE REGISTRATION INFORMATION

The following pages show the registration information for all registered Collection Sites.

