

**United
Technologies**

RCRA at 40 and
UTC's Program Evolution

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No technical data subject to the EAR or the ITAR



Environment, Health & Safety

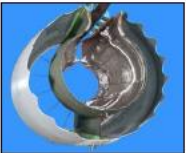
United Technologies Corporation

Industry Leading, Global Franchises

(\$ 2016E)

Aerospace Systems

Sales: ~\$14B



Pratt & Whitney

Sales: ~\$15B



United Technologies

Sales: \$57 - \$58B

Otis

Sales: ~\$12B



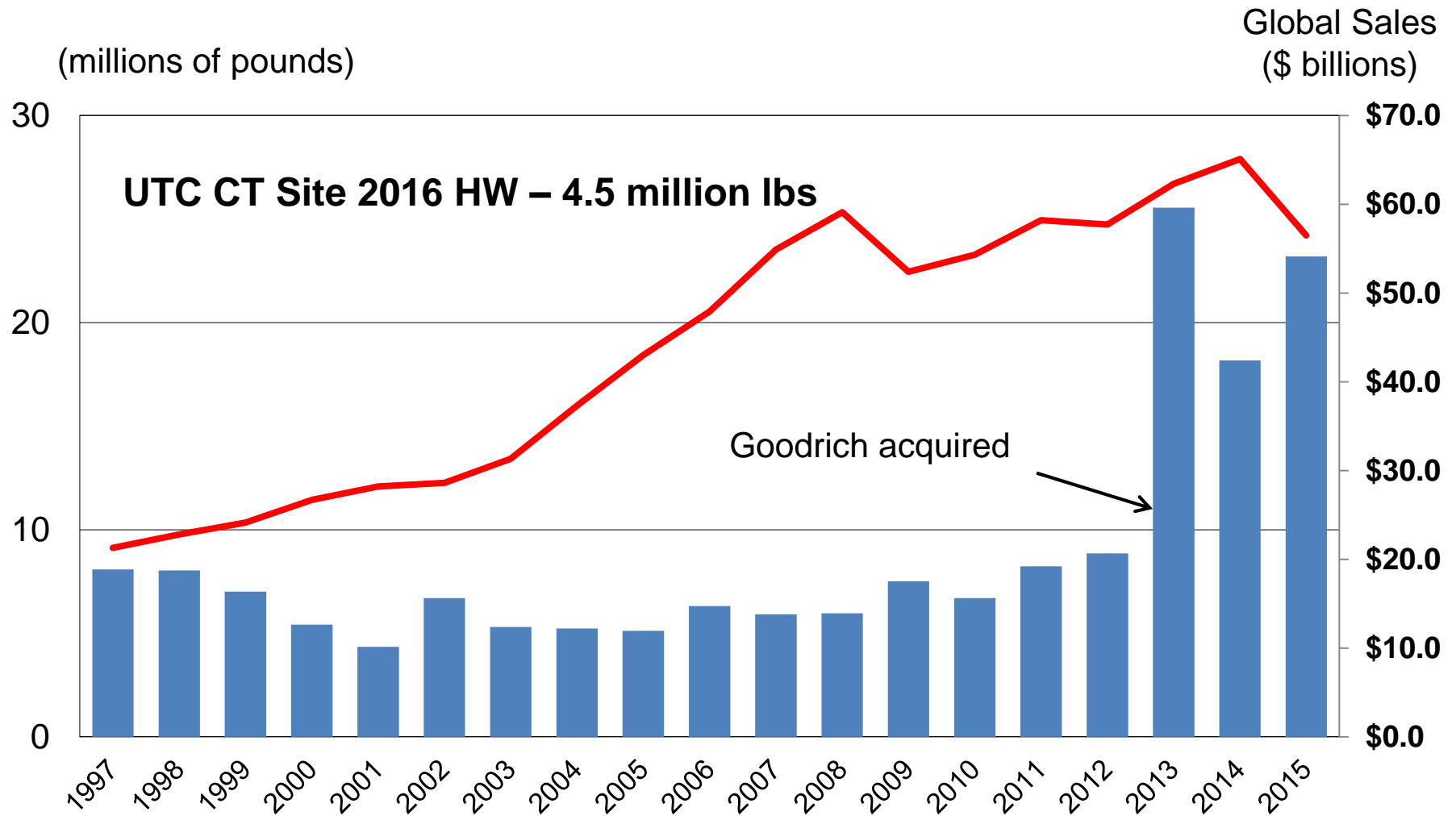
Climate, Controls & Security

Sales: ~\$17B



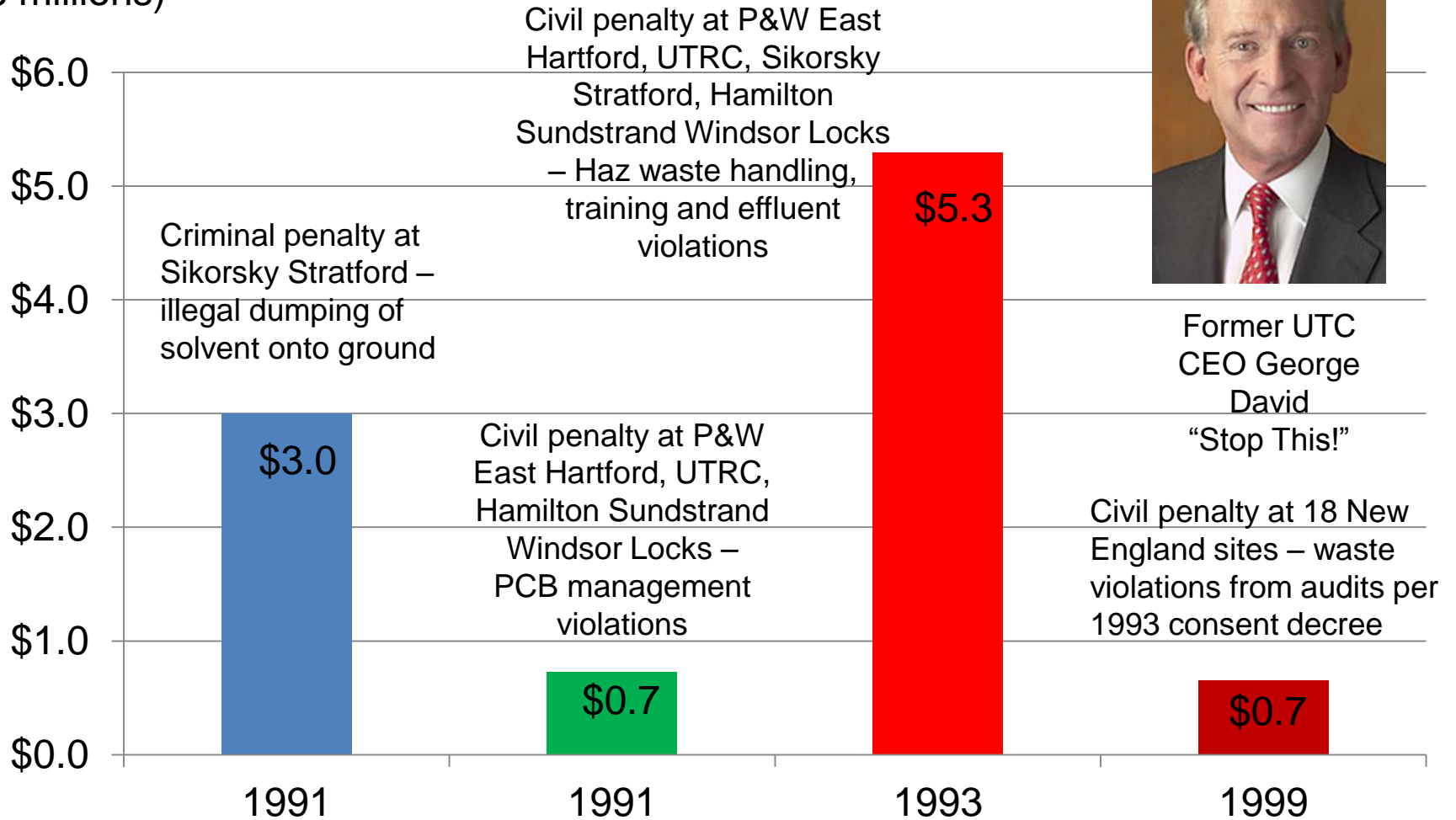
Focused on the core – commercial buildings and aerospace systems and technologies

HAZARDOUS WASTE GENERATED U.S.



UTC CT RCRA Fines 1991 - 1999

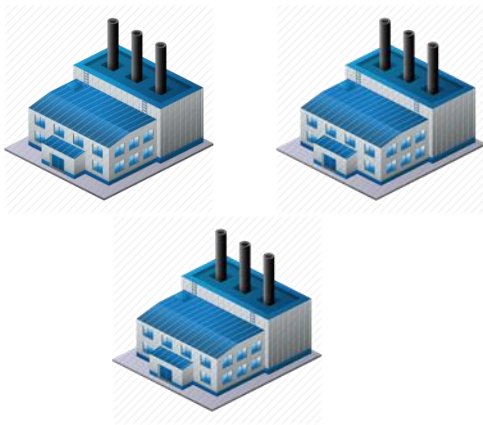
(\$ millions)



Former UTC
CEO George
David
"Stop This!"

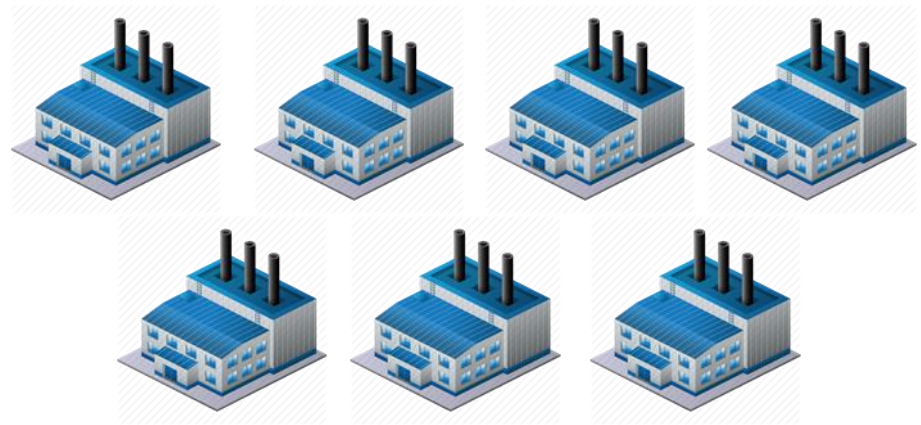
CERCLA LIABILITY

1993



- 337 identified sites
- 87 PRP sites
- \$600 million reserve

2015



- 723 identified sites
- 326 resolved sites
- 127 PRP sites
- \$837 million reserve
- Annual cash outflow - \$50 million

UTC circa 1995

UTC historically a bad actor

Growing legacy of long-term cleanup liabilities

New CEO demanding change

Manager acceptance that RCRA rules were real

RCRA, How Do I Love Thee....

Met primary objective – protect human health and environment from waste mismanagement

Cradle to Grave – Generator Liability

Pollution prevention, toxicity reduction and resource conservation

Evolution – universal waste, used oil regulations

Sometimes, Not So Much...

Regulatory language open to interpretation – regulators and regulated

TSDf rules sometime applied to non-TSDf sites

Recycling not always worth meeting the regulatory or administrative hurdles

CTDEEP



Useful program revisions often slow to occur

Administration and paperwork structure not always equal to risk

Regulatory interpretations sometime differ between staff

CTDEEP



Elevates waste management to level in organization responsible for decision making

RCRA support website tools equal or better than other states

DEEP cultivates positive working relationships with generators, both one-on-one and through HWAC

RCRA at 80



Increase emphasis on recycling and reuse without triggering RCRA permitting

Re-evaluate core waste issues, including obsolescence of many listed wastes

Match RCRA processes with toxicity of wastes

Minimize reliance on paper, encourage electronic systems

Revise entire regulation to modernize language and clarify sections prompting confusion

Thanks

Any Questions?

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