



May 13, 2025

EPR Advisory Council
Maryland Department of the Environment
1800 Washington Boulevard, Suite 610
Baltimore, MD 21230-1719
mde.epr@maryland.gov

Dear Advisory Council Members:

This letter is to inform you of [LPMA powered by Interchange 360's](#) intent to submit plans for an alternative collection program for petroleum and automotive products under S.B. 901, Maryland's Extended Producer Responsibility (EPR) law for packaging beginning on or after July 1, 2026. Furthermore, we request a meeting with the Advisory Council at your earliest convenience to discuss the details of our collection program, how it is being implemented in other states, and its successful outcomes in other jurisdictions.

Everywhere that there is a successful EPR program for packaging, there is a separate collection and material management system for petroleum and automotive packaging. In British Columbia, Canada, for example, the Interchange program operates an independent collection system from the common system. The BC program has approximately 7,000 collection points, including 300 public return collection facilities (e.g., local government and private depots retailers, and service stations) through which it collects approximately 95% of the targeted containers sold in B.C.

The leading petroleum brand owners in the United States launched LPMA powered by Interchange 360 in 2024 to respond to the EPR laws. We serve the petroleum and automotive sector by providing members with support in complying with state EPR laws and by returning material to its members and suppliers for the creation of new products. LPMA powered by Interchange 360 is currently developing program plans for [applicable products](#) in California, Colorado, Oregon and Vermont, with plans to be active in every state that implements an EPR law for its covered materials.

The Founding Members of the LPMA powered by Interchange 360 include BP Lubricants USA, Inc. (Castrol), Chevron U.S.A. Inc., ExxonMobil Oil Corporation, Pennzoil-Quaker State d/b/a SOPUS Products (Shell) and VGP Holdings LLC (Valvoline).

We look forward to your response and partnering with the Advisory Council, Maryland Department of the Environment, producers, recyclers, NGOs, other producer responsibility organizations, and additional members of the value chain to implement a successful EPR program in Maryland. Please contact LPMA Director of Membership Services Mark Carpenter at mcarpenter@interchange360.com or (703) 629-1320 to arrange a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'DL', with a horizontal line extending to the right.

David Lawes, CEO