



September 4, 2025

Brian Beneski
Product Stewardship Program
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017

Via Email: MainePackagingEPR@maine.gov

Dear Brian:

This letter is to inform you of [LPMA powered by Interchange 360's](#) intent to submit an Alternative Collection Program (ACP) proposal on behalf of its members to comply with their obligations as producers under the Act to Support and Improve Municipal Recycling Programs and Save Taxpayer Money ([ME Stat. §2146.](#)), Maine's Extended Producer Responsibility (EPR) law for packaging material. Furthermore, we request a meeting at your earliest convenience to discuss the operations of our program, gain a better understanding of the timeline requirements, and any other details needed to build a successful program for the recycling of petroleum and automotive products.

The intended product scope of our program is for the management of packaging for oil-based lubricants, grease, antifreeze, engine additives, and other fluids typically used in transportation and mechanical applications. The residual fluid in these packaging containers often makes them incompatible with the common curbside collection program, and they can often end up in the disposal stream and landfills if a specific and targeted collection and recycling solution is not applied. We developed an [Applicable Products List](#) of the materials covered that is used for compliance requirements in Colorado and as part of our programs in other states.

Everywhere 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.

Based on our experience in other jurisdictions, there are several key elements that contribute to a successful program including:

- The ability for producers to register, report, and remit fees directly to the organization implementing the ACP;
- Registration with the organization corresponds with registration with the Producer Responsibility Organization (PRO);
- Producers should not have to report to both the PRO and ACP organization for the same packaging; and
- The ACP should be allowed to work independent of the PRO, but the parties work together to submit a coordination plan describing how their efforts will deliver better recovery and recycling outcomes for covered materials.

LPMA powered by Interchange 360 was founded in June 2024 in response to EPR laws by 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 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 in California, Colorado, Oregon, and Vermont, with plans to be active in every state that implements an EPR law for its covered materials.

We look forward to your response and partnering with the Maine Department of Environmental Protection, producers, recyclers, NGOs, other stewardship organizations, and additional members of the value chain to implement a successful EPR program in Maine. 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 long horizontal stroke extending to the right.

David Lawes, CEO