



May 23, 2025

Recycled Content Team
Washington State Department of Ecology
Eastern Region Office
4601 N Monroe
Spokane, WA 99205-1295
recycledcontent@ecy.wa.gov

Dear Recycled Content Team Members:

This letter is to inform you of [LPMA powered by Interchange 360's](#) intent to submit an Individual Program Plan (IPP) on behalf of its members to comply with their obligations as producers under [The Recycling Reform Act](#), S.B. 5284, Washington State's Extended Producer Responsibility (EPR) law for packaging. Furthermore, we request a meeting with the Recycled Content Team at your earliest convenience to discuss the details of our program, how it is being implemented in other states, and its successful outcomes in other jurisdictions.

The intended product scope of our IPP 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.

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.

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 Washington State Department of Ecology, producers, recyclers, NGOs, other producer responsibility organizations, and additional members of the value chain to implement a successful EPR program in Washington State. 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