

January 29, 2026

Recycling Reform Act Team
Washington State Department of Ecology
300 Desmond Dr SE.
Lacey, WA 98503
recyclingreform@ecy.wa.gov

Dear The Recycling Reform Act Team:

Further to our program intention letter sent December 17, 2025, and subsequent email correspondence with the Department of Ecology, this letter is to serve as [LPMA powered by Interchange 360's](#) (Interchange 360) official registration under [The Recycling Reform Act \(S.B. 5284\)](#).

Interchange 360 intends to operate under the alternative collection provision in RCW 70A.208.100(2). I will serve as the person responsible for implementing an approved plan.

In advance of the official registration date of March 1, 2026, you will find the following supporting documents necessary to meet the registration requirements:

1. A list of registered member producers (attached).
2. Interchange 360's standard [Participation Agreement](#).
3. A plan for recruiting additional member producers (attached).
4. A list of current board members (attached).
5. Documentation demonstrating adequate financial responsibility and controls, including:
 - a. Our [Certificate of Incorporation](#).
 - b. Fee setting in any EPR state is designed to cover all state costs, including any department fees. Preliminary state planning costs are currently funded by a fee per gallon. Our fee setting policy used to guide Interchange 360 in all U.S. states will be finalized and published in February on our [website](#).
 - c. The most recent [financials](#) from the Interchange Recycling program in British Columbia. In addition to being responsible for implementing this program, I also implement the program in British Columbia. I will use the same financial and auditing best practices I do there, modified to meet U.S. and Washington State standards.

If you have any questions or require further documentation, please do not hesitate to contact me at dlawes@interchange360.com or (778) 977-1280. We look forward to working with the

Department of Ecology on developing and implementing a successful EPR program for the petroleum and lubricant industry.

Sincerely,

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

David Lawes, CEO

cc: dwes461@ecy.wa.gov; kara.steward@ecy.wa.gov