



# Interchange 360

A trademark of LPMA

## Alternative Collection Program for Petroleum and Petroleum Related Product Packaging

### Maine

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Packaging for oil-based lubricants,  
grease, antifreeze, engine additives and other fluids  
typically used in transportation and mechanical applications

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## Alternative Collection Program – Maine

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## 1. Introduction

In 2021, the Maine legislature passed a law establishing a stewardship program for packaging material (Title 38, §2146). To be fully operational in 2027, the program's purpose is to reduce the volume and toxicity and increase the recyclability of packaging material. Producers—generally the brand owners—will fund the program based on the amount and recyclability of the packaging material they use to contain, protect, deliver, present or distribute their products in or into Maine.

The program will be operated by a stewardship organization (SO) selected by the Maine Department of Environmental Protection (Department) following a competitive bidding process. The SO will be responsible for day-to-day operations of the program while the Department will provide oversight.

The program rules, adopted by the Maine Board of Environmental Protection in December 2024, allow the Department to implement, administer, and enforce the program. The rules also allow the Department to consider proposals for the delivery of Alternative Collection Programs (ACPs) to manage some specific packaging types that are sold, offered for sale, or distributed for sale into the state by the producers.

In anticipation of the spring 2026 commencement of the Department's contract with the selected SO, on behalf of its participating producers, the Lubricants Packaging Management Association (LPMA) is submitting this ACP proposal for petroleum and petroleum related product packaging (covered packaging) as defined in [section 3](#).

Everywhere there is a successful extended producer responsibility (EPR) program for packaging, there is a separate collection and material management system for petroleum and petroleum related product packaging. The residual fluid in petroleum and other automotive packaging often makes it incompatible with common curbside collection programs. If there is no specific and targeted collection and recycling solution, it frequently ends up in the disposal stream and landfills.

## 2. LPMA Directive and Governance

As a nonprofit organization, the directive of LPMA is to provide producers of petroleum and petroleum related products with sustainable, transparent, and cost-effective support for their EPR compliance needs and circular economy objectives.

LPMA was founded by five leading petroleum companies—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 Global)—in response to the passage of EPR laws in several states. LPMA is managed by a [Board of Directors](#), and supported by the CEO and management team using a model focused on ensuring compliance. LPMA plans to be active in every state that implements EPR law for its covered materials.

Interchange 360 is a trademark used by LPMA and commonly applied for public facing uses. Interchange Recycling has operated an EPR program in British Columbia (BC), Canada (population 5.5M) for used oil, oil filters and used oil containers since 2003 and for antifreeze since 2011.

The program model in BC, where the annual rate of packaging collection is approximately 95%, is similar to the model being proposed for Maine. Similar models were also applied to the recently launched Interchange program in the Yukon (population 50K) and LPMA's program in Colorado (population 6M) which launched in March 2026.

LPMA has initiated Maine's foreign qualification process to obtain a Certification of Authority to legally transact business in the state.

Further information about LPMA is available on the [Interchange 360 website](#).

### 3. Packaging Covered by ACP

This ACP covers packaging for the general uses summarized below. A more comprehensive list can be found in [Appendix A](#). The packaging may be plastic (HDPE, non-HDPE, multi-layer), metal (including aerosol containers) or other materials.

- Lubricating oil
- Antifreeze
- Diesel exhaust fluid (DEF)
- Windshield washer fluid
- Brake fluid
- Lubricants
- Stabilizers
- Sealers
- Conditioners
- Boosters
- Solvents
- Degreasers
- Fuel system cleaners

Excluded: Products used to clean or maintain the interior or exterior surfaces of an automobile (e.g., car wax and upholstery shampoo)

As the packaging covered by this program should be collected separately from consumer goods packaging in co-mingled systems, this ACP provides for an alternative approach utilizing a state-wide depot-based collection system that will maximize diversion and reduce contamination or other environmental risks.

## 4. Stakeholder Engagement

As part of its ongoing program operations, LPMA is committed to engaging with and being accessible to its stakeholders, which will occur in a variety of ways. LPMA will:

- Provide the opportunity for Maine’s consumers, service providers and other stakeholders to bring forward questions or concerns to LPMA at any time by direct telephone or email, based on contact information to be published on the LPMA website.
- Commit to conducting regular surveys in the state to track consumer awareness of the program.
- Hold regular partnership meetings with program service providers, including transporters and processors, to assist in keeping current on any challenges to program operations.
- Hold regular partnership meetings with other programs and local governments that manage the regulated products to coordinate efficient program operations.
- Deliver monthly communication to LPMA’s participating producers via e-newsletter to provide updates on key program or producer obligation and compliance matters.
- Conduct targeted stakeholder consultations/surveys/webinars on specific program topics as needed.
- Support dialogue between LPMA’s participating producers and the director who represents the producer on LPMA’s Board of Directors, allowing any producer concerns to be conveyed to the board and staff.
- Monitor for scheduled Maine and external conferences or events and attend those where LPMA’s participation would be beneficial.

LPMA is also proposing a comprehensive education and outreach program, as detailed in [section 13](#).

## 5. Collection Targets

To estimate the amount of material available to collect, LPMA seeks to identify and use the best available information which will be gathered from its participating producers, service providers and, where needed, qualified external consultants. For purposes of this ACP, it is assumed that all [covered packaging](#) sold into the Maine marketplace is available for collection.

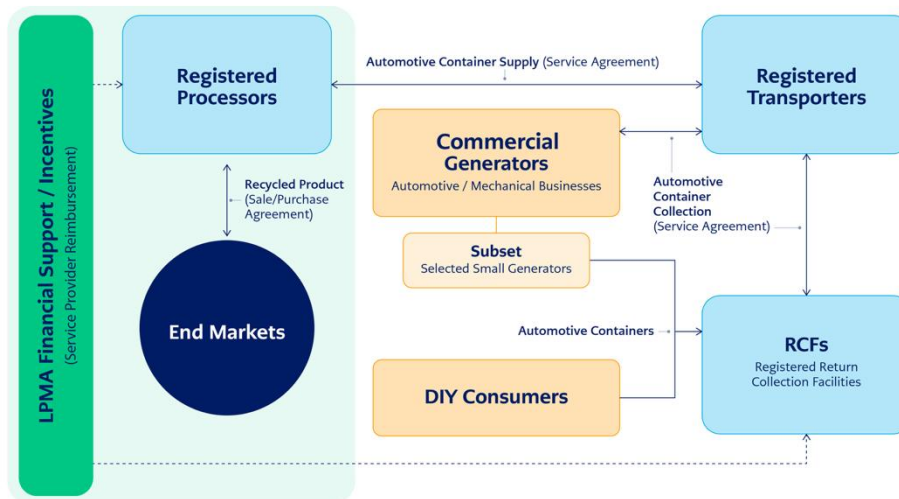
LPMA’s overall goal for the collection and recycling of covered packaging is year-over-year improvement. LPMA is currently working with its producers to gather sales data for the covered packaging as the basis for estimating the materials available to collect, and to allocate the collected materials to the producers responsible for them.

Data collection and reporting in the first two years of program operation will allow LPMA to establish informed baseline rates and implement collection targets that demonstrate ongoing improvement. LPMA’s emphasis on delivering a robust consumer [awareness and education program](#) in coordination with other recycling initiatives will increase knowledge of the proper disposal methods and improve annual material collection and recycling performance.

## 6. Alternative Collection Program

In accordance with Maine law, the LPMA collection program will provide access to collection services to residences (single and multi-family) and public spaces where a government entity managed recycling collection as of August 1, 2025. These services will be year-round, convenient, free and available state-wide.

The diagram below depicts the proposed LPMA collection model and is followed by descriptions of its components. (LPMA’s financial support/incentive program for service providers, also depicted in the diagram, is detailed in [section 12.](#))



### a) Collection Model

Collection facilities, transporters and processors must register with LPMA before they are eligible to participate in the program. Registrants must manage materials in accordance with the law and meet LPMA program plan and contractual requirements.

#### Return Collection Facilities

Public Return Collection Facilities (RCFs) will be available for free drop-offs of covered packaging by do-it-yourself (DIY) Consumers. Consumers who change their own oil or

antifreeze generally represent a lower percentage of the overall generation of the used packaging than the commercial, industrial and institutional generators.

Some smaller Commercial Generators with low quantities of packaging may also use the free RCFs, should they prefer this option over the Commercial Collection system (discussed next in this section). Usage of RCFs by these small Commercial Generators will, however, be subject to the capacity of individual RCFs, which should be confirmed in advance of the drop-offs. Small Commercial Generators may include businesses such as service stations, mechanic shops, and auto dealerships.

Prospective RCFs must submit an LPMA Registration Form for review and approval. RCFs can be privately operated multi-material depots (bottle depots), municipal and regional transfer stations and landfill sites, eco depots, retail sites or other businesses. Maine's existing service providers, HHW facilities, and solid waste facilities that accept a variety of products for recycling will be actively encouraged by LPMA to request registration with the program. The RCF selection process will be open, fair and competitive while aligning with the [LPMA service standard](#) committed for Maine.

Once the RCF locations are finalized, the [Interchange 360 website](#) will include a search tool for consumers to locate their nearest free drop-off facility. Each RCF will be required to accept all formats and sizes of the covered packaging. Materials dropped at RCFs will be picked up regularly by Registered Transporters based on agreements between the two parties.

RCFs will provide dedicated storage areas for the packaging (stored by material type) to reduce the risk of contamination from or to other materials that may be collected at the site. The packaging may be sorted (e.g., oil, antifreeze, others) and transported directly to Registered Processors, depending on the logistical requirements of the chosen transport provider.

An [instruction manual for RCF staff](#) can be found on our website and will be provided to all Maine RCF operators. The RCF training will include monitoring for and segregating packaging where significant residual fluids remain. Any residual oils received will be collected and redirected for recycling.

### **Commercial Collection**

Commercial Generators are non program-registered businesses that regularly handle covered packaging (and other used oil products) as part of their commercial or industrial operations, or from the maintenance of vehicles and equipment. As public RCFs have limited storage capacity, they are not intended for drop-offs by any Commercial Generators with quantities markedly higher than a DIY consumer. Instead, these generators will be directed to

choose the Registered Transporter(s) with which they want to make direct pick-up service arrangements. The resulting collection agreements between the two parties ensure ongoing material access and diversion, often outlining the collection frequency, collection requirements, storage requirements and any payments or charges. While these agreements are between the generator and the transporter and do not involve LPMA, the Registered Transporters making the pick-ups and the Registered Processors receiving the materials are [compensated](#) by LPMA based on the generator's location and the collected volumes.

The commercial collection system provides the cleanest material and leads to the best environmental outcome for that material. In a commercial setting, the covered packaging can be stored and kept clean and free of contaminants, which significantly improves recyclability. As with the public RCFs, the packaging at Commercial Generator sites may be pre-sorted and then transported directly to Registered Processors.

Registered Transporters are required to ship the covered packaging collected from both RCFs and Commercial Generators to a Registered Processor for an LPMA-approved end use, based on supply agreements between the parties.

Prospective transporters and processors must submit a Registration Form for review and approval by LPMA. Registration is open to all service providers that meet the eligibility requirements. Service provider selection will be an open, fair and competitive process similar to that used in Colorado. Registration details are provided in the [Manual for Registered Processors and Transporters](#). All Registered Transporters and Processors must demonstrate the use of environmentally sound management practices in order to be approved and receive reimbursement from LPMA under the program. Preference for registration will be given to transporters and processors that demonstrate strong labor standards and worker safety practices.

Specific documents must be submitted with the registration application, including an initial Letter of Regulatory Compliance (discussed below), scale calibration certificates and, specific to any producers of plastic shredded flake, an end-fate confirmation letter. Additional evaluation criteria in the competitive process will include but not be limited to (a) the applicant's location in comparison to existing sites, (b) the program's convenience standards, (c) the applicant's size and processing capacity, (d) accessibility to consumers, and (e) evidence of strong labor standards and worker safety practices.

As covered packaging often contains a certain amount of residual used oil or other fluids, measures are required to ensure that proper equipment and vehicles are used for their transport. As a result, it is important that any Registered Transporters and Processors handling this packaging are doing so in compliance with the required environmental standards. LPMA requires that, as a condition of registration and every two years thereafter, each transporter and

processor engage an independent third-party qualified professional to conduct an environmental audit of their operations and state in a Letter of Regulatory Compliance that the operation is in substantial compliance with all applicable state and federal environmental legislation and regulations. In addition, upon registration and every two years thereafter, they must submit to LPMA their Certificate of Good Standing for the business registration in Maine. LPMA will not approve/retain the registration of a transporter or processor unless both conditions are met.

## **b) Other Collection**

LPMA will assist with other Maine initiatives that advance collection of the covered packaging and/or program awareness.

### **Community Collection Events**

LPMA will provide financial support for community collection events operated by local governments, tribal nations and community groups. These are often multi-material events that are supported by other recycling programs and provide residents with an opportunity to recycle a variety of products at the same location.

The funding for these collection events will be similar to the Round Up Event Grant offered by Interchange Recycling in BC. The grant offered in Maine will represent 100% of LPMA's estimated share of the costs for its covered packaging or a minimum of \$1,500 (plus the transport and processing incentives paid to the transporter/processor), as calculated on an event-by-event basis and negotiated with the event organizer. Any organization may apply for the grant, which is offered with the goal to help increase the number of free collection services available to residents state-wide. Preference will be given to those communities that do not have reasonable and free consumer access to a permanent RCF.

These events are geared to communities that are interested in having an event in place of a facility, or as a consumer awareness initiative in communities that already meet LPMA's service standard ([section 7](#)).

### **Working with the Curbside System**

LPMA will work with the SO and other stakeholders to ensure collection and management of any covered packaging inappropriately discarded by consumers at residential premises into the curbside system. However, the preference will be that consumers are directed to bring this packaging to an RCF or Community Collection Event to reduce contamination risks.

## 7. Collection Service Accessibility (Convenience Standards)

Based on LPMA's service standard (described below), the aim will be to increase accessibility and service levels over the lifespan of the ACP, while still operating a cost-effective program.

### a) Service Standard

Following is the LPMA methodology for determining the service for each Maine community. The standard ensures service in each of Maine's 16 counties, in accordance with Chapter 428 Section 11(b). It is intended as a guide as more customized approaches may be required to achieve the best collection solution for individual communities or groups of communities.

**Distribution Criterion:** Provide 90% of the state's residents with access to a permanent (e.g., year-round) drop-off site within 15 miles of their residence (otherwise, a collection event).

Population counts are based on United States Census Bureau data, as updated annually.

Tribal Nation Inclusion: LPMA will work directly with all Tribes to understand their needs specific to collection of the covered packaging, and to develop the appropriate LPMA services for each Tribe if they choose to opt-in to the program.

### b) Access to Facilities

As part of the planned depot search tool on the LPMA website, LPMA will provide the location and operation hours of the RCFs that accept covered packaging.

## 8. Processing and Responsible End Markets

LPMA will manage materials to the greatest extent possible in accordance with the solid waste management hierarchy.

LPMA requires Registered Transporters to ship covered packaging to Registered Processors that are an LPMA-approved responsible end market. For all material types, LPMA will give precedence to mechanical recycling processors where feasible.

Registered Processors must ensure that materials are managed in a way that benefits the environment, minimizes risks to public health and worker health and safety, and is in compliance with environmental requirements. To that end, every two years, LPMA requires that these registrants engage an independent third-party qualified professional to conduct an overall environmental audit of their operations.

All processed packaging will be sold as raw material commodities to manufacturers of new products and packaging. At the program onset, the packaging will be shipped out of state or country, as close to the generation source as possible, until other market options are developed.

LPMA Registered Processors are facilities that:

- Shred the plastic containers, remove the oil and antifreeze from the plastic, and pelletize it into reusable plastic resin;
- Shred the plastic containers, remove the oil and antifreeze from the plastic, and create “shredded flake”; or
- Smelt the metal containers for processing into recycled steel.

For bag-in-box packaging, the box will be directed to fiber recycling, and the lightweight bladder bag will be sent to recycling or landfill, pending available downstream options. As these bags contain nylon, there is currently not a feasible mechanical recycling option at end of use. LPMA is carefully monitoring for new recycling options for this product.

Reporting on the end markets of all covered packaging collected will be provided in LPMA’s Annual Reports and on its website. LPMA’s reporting reflects that Registered Processors receiving compensation from the program are required to demonstrate independently verified, responsible end markets which are subject to LPMA desk, field and compliance reviews.

## 9. Funding Mechanism and Participating Producers

The program will be funded by [Producer Responsibility Fees](#) (fees) payable to LPMA by its participating producers on the sale or commercial use of new covered packaging in Maine. Each producer will determine if/how it will recover the fees.

Fees will be structured in accordance with the [LPMA Fee Setting Policy](#). They will ensure all program operational costs are covered including payments to service providers, infrastructure development, public communications, state oversight costs, legal, IT and administration.

LPMA will also maintain a financial reserve sufficient to operate the program in a fiscally prudent and responsible manner.

### a) Eco-Modulation

Incentive fees as determined by Chapter 428 Section 10(A)(3) will be applied to participating producers by the third calendar year in which producers report. These incentives are intended to enhance post-consumer recycled material use and packaging recyclability, reduce toxicity in packaging materials, reduce litter from packaging materials, reduce the amount of packaging used and ensure accurate labeling of packaging to reduce consumer confusion.

## 10. State Goals

In support of the state goals as determined in Chapter 428, LPMA will gather data to share with the state SO and the Department pertaining to recycling access, participation, collection, reduction, reuse, recyclability of materials and recycling rates, and post-consumer recycled material use.

## 11. Producer Compliance

LPMA's required [Participation Agreement](#) for producers is available on the LPMA website and includes producer obligations for participation in the program. LPMA may terminate an agreement immediately if the producer ceases to carry on business or fails to comply with LPMA's rules, policies or the terms of the agreement.

Should a producer be non-compliant with any LPMA participation terms, they will be notified of their non-compliance and LPMA will work with them to resolve the issue in a timely manner. If resolution cannot be reached within a reasonable timeframe, LPMA will notify the Department of the unresolved non-compliance and may temporarily suspend the producer's registration.

LPMA will continue to proactively reach out to any non-participating producers to ensure they are aware of and understand producer obligations in Maine, where to find further information, and how to become compliant if they are obligated. As with participating producers, LPMA will work with any obligated non-participants to bring them into compliance, and to notify the Department if this cannot be achieved in a timely basis.

Each participating producer is required to [report on and submit fees](#) using LPMA's prescribed remittance form, available through its secure online portal. The form captures data by product format/size, facilitates ongoing reporting on the quantities of covered packaging containing post-consumer recycled (PCR) materials, and is subject to periodic audits by LPMA. The volume-based reporting by producers will be converted to weight (tonnage) by LPMA for purposes of annual reporting to the SO and the Department (see [Appendix B](#)).

## 12. Service Provider Financial Support/Incentives

LPMA's depot and commercial-based collection system for covered packaging requires a compensation approach that differs from the reimbursement approach for curbside collection. LPMA will pay the cost of material collection and management by providing financial support or incentives to the marketplace to drive desired results. LPMA will demonstrate independently verified, responsible end markets associated with the incentives it pays under the program.

Participants will continue/have the ability to market the material, provided they meet program standards, thereby supporting a competitive marketplace. LPMA payments will remain competitive to ensure high levels of program participation to meet program performance targets.

### **Return Collection Facilities**

As shown in the diagram in [section 6](#), direct support will be offered to RCFs by LPMA. This support is in the form of an RCF Incentive which is paid based on the packaging weight. It is intended to offset site operating costs in return for receiving covered packaging at no cost to consumers.

Infrastructure Grants as well as marketing support, such as signage and digital/social media assets, are also available to RCFs. As noted earlier, RCFs can be retailers, depots, local governments, HHW facilities, or other businesses that choose to enter into an agreement with LPMA and to separately enter into a service agreement with a Registered Transporter(s).

The grants will be fully funded by producer fees to support improved facility standards such as storage shelters and containment materials, with the amounts based on individual RCF needs. Applications for Infrastructure Grants outlining the facility's proposed expenses will be accepted upon the Maine program's launch, using processes and forms similar to those applied in Colorado ([RCF Infrastructure Grant Program Manual](#)).

To be eligible for the grant, applicants must have an approved RCF registration from LPMA, must agree to act in accordance with the program's instruction manual for RCF operators, and must comply with the terms and conditions identified in the grant manual and application form. Applications will be evaluated based on:

- Organization type including quality, efficiency and stability of the organization;
- Recycling services including products being accepted and breadth of services;
- Hours of operation that the RCF is open to the public; and
- Current level of service in the area and the anticipated benefit that new infrastructure would have on the service level standard.

As the needs of the specific community are an important factor in LPMA's evaluation, an RCF may be eligible for more than one grant. Approved applicants will receive payment from LPMA for the authorized expense items following submission of an invoice to LPMA within 60 days of their delivery.

### **Registered Transporters and Processors**

LPMA provides a Return Incentive (RI) to Registered Transporters and Processors based on the collected material weight multiplied by the rate assigned to the collection zone in the

state where the covered packaging is sourced.

As shown in the diagram in [section 6](#), the RI is paid directly to Registered Processors, who in turn compensate their transporters for the materials they source from RCFs and/or Commercial Generators. Rates will be set at levels that will incentivize program participation and the cadence for revisiting them.

For incentive and reporting purposes, each of Maine’s 16 counties will be designated as a collection zone. This division will be assessed over time as more is learned about service providers in Maine. The variable RIs support economic and efficient collection of covered packaging across the state by offsetting the costs of collecting and processing the materials at registered processing facilities.

RI claims provide regular reporting to LPMA on the packaging volumes collected by the Registered Transporters and processed by the Registered Processors.



### a) Compensation Methodology

The four cost/revenue components included in LPMA’s methodology are described below. The methodology identifies the cost elements specifically considered and the types of support or financial incentives provided to ensure that program accessibility and collection objectives are met. LPMA will cover the net program costs through the methodology described in the table below.

Cost/ Revenue Component	Cost/ Revenue Elements Considered	Support/Incentives Provided by LPMA for	
		Commercial Collection	RCF Consumer Collection
<b>Generator Site Costs</b>	Labor Space Equipment Materials Other	No incentive provided by LPMA—these costs are considered to be a cost of business for all commercial operators who derive used covered packaging as a by-	An <b>RCF incentive</b> based on packaging weight is provided directly to the RCF operator to offset site operating costs in return for receiving covered packaging at no cost to consumers

Cost/ Revenue Component	Cost/ Revenue Elements Considered	Support/Incentives Provided by LPMA for	
		Commercial Collection	RCF Consumer Collection
		product of their normal business operations	<b>Infrastructure grants</b> are available to RCF operators to support improved facility standards for the RCF operators and transporters, and to allow RCFs to store packaging safely and in economic quantities
<b>Market Value of Collected Materials</b>	Positive or negative market value of the collected materials	No incentive provided by LPMA—this is considered to be a cost/revenue source for all commercial business operators who derive used covered packaging as a by-product of their normal business operations	An RCF incentive will be provided by LPMA directly to the RCF operator to offset site operating costs in return for receiving covered packaging at no cost to consumers
<b>Transport and Management</b>	Fuel Labor Insurance Equipment Overhead costs Market price (cost) Other	A graduated <b>Return Incentive</b> based on defined collection zones is paid to registered transporters and processors to offset the costs of transporting and managing the used covered packaging from the generation point to the processing facility	A graduated <b>Return Incentive</b> based on defined collection zones is paid to registered transporters and processors to offset the costs of transporting and managing the used covered packaging from the generation point to the processing facility
<b>Processing Costs / Revenue</b>	Processing costs	<b>Return Incentives</b> paid to registered processors, when considered with the net revenues and/or costs of processing these materials, cover the costs of processing the covered packaging to LPMA-approved processing standards	RCF operators may benefit from revenue opportunities, where negotiated with transporters and/or processors

Following its initial implementation, LPMA will conduct regular reviews of the RI rate schedule for potential adjustments, or as triggered by changes in the relevant cost/revenue areas such as market values of collected materials and the costs of collection and management. LPMA anticipates frequent reviews within the first year of operation as more is learned about service provision in Maine. This ongoing monitoring will ensure program goals continue to be met, despite fluctuations in the variables that attribute to cost/revenue for program participants.

LPMA will also work with Maine’s Commercial Generators and Registered Transporters and Processors to ensure the factors that dictate the cost of service are well understood by all parties so that efficient/timely collection is provided by all transporters, and processors receive high quality materials. Setting of standards for quality, contamination, minimum volumes and methods and the location of stored materials will also ensure that commercial operators can better manage their commercial agreements with Registered Transporters and Processors.

### **13. Education and Outreach**

To ensure compliance with the Department’s requirements for raising public awareness, LPMA, as an ACP, will implement a comprehensive, statewide education and outreach program focused on the recycling and reuse of covered packaging. This initiative will educate consumers on proper material handling, available recycling services, and preparation requirements to reduce contamination and preserve material quality. By providing clear, accessible information about collection pathways, LPMA will strengthen public understanding of how the ACP operates and how it complements Maine’s broader recycling system.

LPMA’s outreach efforts will deliver clear, consistent messaging tailored to reach diverse demographics across Maine, including—but not limited to—rural and urban communities, non-English speaking households, Indigenous populations, seniors, students, and low-income or historically underserved groups. Materials will be offered in multiple languages and formats (e.g., digital, print, audio, and visual content) to ensure equitable access to information and to accommodate varying levels of literacy, digital access, and cultural context. Education investments will promote proper recycling behaviors, increase participation in ACP collection pathways, and reduce contamination.

To maximize reach and reinforce consistent messaging, LPMA will leverage existing state and local education and outreach programs, including those developed by the Department, local governments, and regional solid waste authorities. To ensure clarity and avoid consumer confusion, LPMA will coordinate, where appropriate, with the SO and other statewide education efforts. Messaging will clearly distinguish materials managed under the ACP from those managed through municipal curbside programs, while reinforcing correct sorting behaviors. By collaborating with these entities and aligning messaging with what communities already recognize and trust, LPMA will streamline public education efforts and avoid duplication. LPMA’s program will also provide additional funding and resources to help local partners scale their outreach within their communities, subject to Department review and approval of proposed education investments.

To further enhance outreach, LPMA will partner with newspapers, magazines, and online periodicals, using advertising as part of the producer fees, which supports local publications

while expanding public engagement. All education and outreach expenditures will be identified within LPMA's annual reporting to the Department, including a description of the investments made and an evaluation of how those investments support increased access to ACP collection services and encourage reuse of covered packaging materials statewide. To measure effectiveness, LPMA will implement a method to evaluate and report on public response and recycling habits, ensuring the education and outreach program remains responsive, data-driven, and aligned with Department-approved performance objectives.

## 14. Dispute Resolution

LPMA is committed to understanding and addressing any matters as they are initially raised by stakeholders. Should issues or concerns be identified, the individual or organization can take the following steps:

- LPMA provides multiple communication channels to mitigate the need for issue escalation. As detailed in [section 4](#), LPMA offers clear pathways to raise matters of concern early on, including by consumers, the general public, participating producers and service providers\*. Should there be a matter that cannot be resolved collaboratively through the normal channels, the individual or organization can proceed through the next steps.
- Bring the dispute to LPMA's Chief Executive Officer.
- If the matter is not resolved at the previous levels, normal commercial legal processes, such as Maine's arbitration laws, can be pursued.

\*With respect to potential service provider matters, of note is that LPMA's incentive system supports the competitive commercial market.

## 15. Annual Report

In accordance with statute and the rules adopted by the Department, on behalf of its participating producers, LPMA will report the following information annually to the SO and to the Department using an annual report form approved by the Department.

- (1) The total tons of each type of packaging material collected, reused, recycled, disposed of at an incineration facility or otherwise managed under the ACP in the prior calendar year.
- (2) A breakdown of the total tons of each type of material attributed to each producer participating in the ACP.
- (3) A list of the collection opportunities in the state for the types of packaging material managed under the ACP that were made available in the prior calendar year.

- (4) A description of the education and outreach strategies implemented by the ACP in the prior calendar year to increase consumer awareness of the program throughout the state.
- (5) Transporters and markets used in the operation of the ACP during the previous calendar year, and the amounts of packaging material sent to each market.
- (6) The amount of each packaging material type collected at each collection location.
- (7) The tons attributed to each producer.
- (8) Any interruption to collection services.
- (9) A list of material that does not qualify as packaging material due to its origin that is managed with the packaging material collected through the ACP, and the method used to ensure such material is not counted as packaging material.

## **Appendix A**    Applicable Products List (at December 15, 2024)

LPMA will manage all petroleum and petroleum related products packaging up to and including 15 gallons, including oil-based lubricants, grease, antifreeze, engine additives, and other fluids typically used in transportation and mechanical applications and where this packaging is often comingled with oil and antifreeze packaging at generator sites.

Some common types of petroleum and petroleum related packaging include rigid bottles (e.g., quart, gallon, etc.), pails (e.g., five-gallon buckets), multi-layer tubes and cartridges, and bag-in-box (e.g., 3- or 5-quart fluid-filled bags inside of a cardboard box) and aerosols. Materials used in packaging contain a range of materials including, but not limited to high-density polyethylene (HDPE), polypropylene (PP), polyethylene (PE), metal, cardboard, paper, and other constituents.

### **Included Products:**

- 2-cycle engine oil
- 3 in 1 oil for household / garage
- aerosol propelled lubricant
- agricultural spray oil
- anti-seize lubricant
- brake fluid
- chain oil
- circulating oil
- cleaning flushing fluids for motors/equipment
- compressor oil
- conveyor lube
- crankcase oil
- dedusting oil
- diesel exhaust fluid (DEF)
- diesel fuel treatment
- drawing, stamping, and shaping oil
- dripless lube
- electrical insulating oil
- emulsified oil
- engine conditioners
- engine degreaser
- engine oil
- engine sealers
- ethylene glycol engine coolant
- ethylene glycol heat transfer fluid
- food grade white mineral oil
- form release oil
- fuel boosters
- fuel system cleaners
- fuel/oil stabilizers
- fuel-line de-icing fluid
- gasoline/2 cycle engine oil mixes
- gear oil
- glycol-based heat transfer fluid
- grease
- gun oil
- hydraulic fluid
- hydraulic jack oil
- hydraulic oil dye
- lock de-icing fluid
- lubricants
- machine tool and slideway lubricant
- marine cylinder oil
- marine engine oil for vessels operating domestically
- metal working oil
- mineral heat transfer fluid
- natural gas compressor oil consumed in use

- natural gas compressor oil not consumed in use
- oil additive
- oil treatment
- paper machine oil
- parts degreaser
- penetrating oil
- petroleum crankcase oil
- phosphate ester hydraulic fluid
- pneumatic system oil
- polyglycol synthetic compressor oil
- polyolester fluids
- power steering fluid
- process oil
- propylene glycol engine coolant
- propylene glycol heat transfer fluid
- quenching oil
- refrigeration system oil
- re-refined oil
- rock drill oil
- rustproof oil
- saw guide oil
- sewing machine oil
- silicone heat transfer fluid
- silicone lubricant
- solvents
- synthetic aromatic hydrocarbon heat transfer fluid
- synthetic crankcase oil
- textile oil
- transmission fluid
- turbine oil
- vacuum pump oil
- vegetable oil for lubrication
- water glycol hydraulic fluid
- windshield washer fluid
- winter start fluid
- wire pulling lubricant

## Appendix B Volume to Weight Conversion Factors

Product Packaging Format	Container Size	Packaging Weight (grams/unit)	Standard Container Size (gallons)
HDPE Tube / Pint	16 oz	36	0.125
HDPE bottle	1 Quart	50	0.250
HDPE bottle	1 Gallon	190	1.000
HDPE bottle	2.5 Gallon	400	2.500
HDPE Pail	5 Gallon	1,020	5.000
Aerosol can	16 oz	70	0.125
Metal can	16 oz	70	0.125
Bag in Box	3-6 Gallon	90	4.500
Pouch	1 Quart	15	0.250

LPMA may adjust these conversion factors from time to time based on new information.