Date: September 1, 2026

To: Vermont Department of Environmental Conservation – Josh Kelly and Mia Rothstien

Re: Request for PRO Approval and Declaration for Plan Submittal

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Dear Josh and Mia:

We have been following the policy changes in Vermont in 2026, particularly the passage and signing of H915 which, as you know, allows separate Producer Responsibility Organizations (PROs) for classes of HHW products which can now include packaging. I am writing to notify the Vermont DEC that our organization, Interchange 360, will be submitting our program plan, and we are now asking for public acknowledgement from DEC of our intent to develop a program for this specific class of product and packaging. Out list of covered products can be accessed here: LPMA-Applicable-Product-List-2026.05.28.pdf

We see public acknowledgement being important because:

- Lubricant and automotive product producers have a clear understanding of their compliance options, registration processes and deadlines, and upcoming program transition
- The industry is aware of our intent when submitting comments to the Vermont collection plan
- Existing collection facilities are aware of our future plans and can prepare for the upcoming transition accordingly
- We can be ready to hit the ground running once our plan is approved helping to ensure more material is recovered and processed sooner

I also want to thank you and your staff for meeting with us to discuss our plans and the scope of materials that LPMA participants represent, and to understand the role of the state. We hope to continue this dialogue over the next few months to fully understand how the transition from the state-run program to a PRO run program will best be achieved.

The Founding Members of the LPMA 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 Global). The Founding Members have created the LPMA Powered by Interchange 360, a national non-profit EPR compliance agency, with a purpose of providing EPR compliance options for its members and supporting the development of circular material management solutions for petroleum and petroleum-related products and packaging.

In our experience, every jurisdiction with a successful EPR program for HHW has a separate and independent collection and material management system for petroleum and petroleum-related products and packaging. For example, in British Columbia, Canada (pop 5.5M), the Interchange program operates an independent collection system for petroleum and petroleum related products and packaging, separate from other HHW products. 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 over 90% of the targeted products and packaging available for collection.

Please let me know if you have any questions.

Best Regards,

Eric R. Nelson
Director EPR Compliance
Interchange 360