



Date: June 26, 2024

To: Darla Arians, Colorado Department of Public Health & Environment

Re: **Notice of Intent to submit an Individual Program Plan ("IPP")**

Please receive this Notice of Intent from the Lubricant Packaging Management Association ("LPMA") to submit an IPP on behalf of its Members to comply with their obligations as Producers under the Colorado Producer Responsibility Program for Statewide Recycling Act ("Act").

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). The Founding Members have created the LPMA, a national non-profit extended producer responsibility ("EPR") compliance agency, with a purpose of providing EPR compliance options for its members and supporting the development of circular material management solutions for their petroleum-based and related products and packaging.

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. Some common examples of petroleum containers 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). 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.

We have engaged in discussions with Circular Action Alliance on a Coordination Agreement, as required by the Act. Key areas of coordination are with Producers on their compliance options, the public on information on how and where to recycle and post collection material reconciliation to ensure accurate reporting.

Please let me know if you have any questions. I would like to request a meeting with you to discuss the timing of our plan development, including public consultation. I can be reached at dlawes@interchangerecycling.com or 1-778-977-1280.

Sincerely,

A handwritten signature in black ink, appearing to read "DL", is written over a light blue horizontal line.

David Lawes
