



**Renewable Lubricants, Inc.**

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**RE: VGP Vessel General Permit Compliance Declaration:**

For over 20 years, Renewable Lubricants Inc. (RLI) has been dedicated to developing, manufacturing and marketing Environmentally Accepted Lubricants (EALs) from biobased materials. RLI has a full product line of high-performance EALs that are specially formulated to provide the required protection for marine equipment and comply with the regulations defined in the 2013 Vessel General Permit (VGP).

**Vessel General Permit legislation**

On 19 December 2013, the United States Environmental Protection Agency's (EPA) VGP took effect. The VGP provides the practices and procedures for commercial vessels to comply with the Clean Water Act National Pollutant Discharge Elimination System (NPDES).

**VGP Section 2.2.9**

All vessels must use an EAL in all oil to sea interfaces, unless technically infeasible. "Environmentally acceptable lubricants" means lubricants that are "biodegradable" and "minimally-toxic" and are "not bio-accumulative" as defined in Appendix A of the permit.

Describe in more detail by the EPA's publications in <http://cfpub.epa.gov/npdes/vessels/vgpermit.cfm>

**Affected equipment**

The VGP affects a wide range of equipment, including:

- |   |                            |                         |                                    |
|---|----------------------------|-------------------------|------------------------------------|
| Wire Rope   | Propulsion Pod Lubrication | Stern Tubes             | Paddle wheel propulsion            |
| Controllable Pitch Propellers   | Azipods                    | Rudder Bearings         | Stabilizers                        |
| Thruster Azimuth Bearings   | Thruster Hydraulic Fluids  | Towing notch interfaces | <b>Other oil-to-sea interfaces</b> |
| Mechanical equipment subject to immersion (e.g. dredges, grabs, etc.) |                            |                         |                                    |

**VGP additionally includes equipment operating in areas that are clearly terrestrial and do not contain waters suitable for permitted vessels greater than 79 feet,**