Renewable Lubricants, Inc.
476 Griggy Rd. NE, PO Box 474
Hartville, OH 44632-0474
Voice: 330.877.9982 Fax: 330.877.2266
www.renewablelube.com

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	**Other oil-to-sea interfaces**

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, (See Section 1 SPECIFIC REQUIREMENTS)