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RE: Vessel General Permit (VGP) and Small Vessel General Permit (sVGP) 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 VGP and sVGP.

Vessel General Permit legislation

December 2013, the United States Environmental Protection Agency's (EPA) VGP took effect. The VGP and sVGP 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 VGP permit and section 6 in the sVGP. 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 6 SPECIFIC REQUIREMENTS FOR INDIVIDUAL STATES OR INDIAN COUNTRY LANDS and Appendix G – Waters Federally Protected Wholly or in Part for Conservation Purposes, including a complete list of marine sanctuaries, units of the National Park System, units of the National Wildlife Refuge System, National Wilderness areas, and national wild and scenic rivers system components).

Record Keeping – VGP Section 4.2

Records must be kept that include the Safety Data Sheets and Technical Data Sheets for all EALs used to prove compliance with the permit.

The following Renewable Lubricants Inc. products meet the Environmental Protection Agency (EPA) 2013 Vessel General Permit (VGP) definition for Environmentally Acceptable Lubricants (EALs), and should be used where **LOW TOXICITY, BIODEGRADABILITY** and **NON-BIOACCUMULATION** properties are required and/or recommended. (Contact RLI for additional EAL products).

Bio-SynXtra™ Stern Tube Lubes (ISO 68, 100, 150, 220)	Bio-SynXtra™ Trans-Hydraulic Fluid (Super UTF)
Bio-SynXtra™ Marine Hydraulic Fluid (ISO 32, 46, 68, 100)	Bio-SynXtra™ Hydrostatic Fluid (Low-Viscosity UTF)
Bio-Ultimax™ 2000 Hydraulic Fluids (ISO 22, 32, 46, 68, 100)	Bio-Fleet™ Trans-Hydraulic Fluid (UTF)
Bio-Ultimax™ 1000 Hydraulic Fluids (ISO 22, 32, 46, 68, 100)	Bio-SynXtra™ Super FG Compressor Fluids H1 (ISO 15, 22, 32, 46, 68, 100, 150, 220)
Bio-Ultimax™ 1000 Hyd. Fluid ISO 32 Navy Approved for ASDS	Bio-Food Grade™ 3H General Purpose Lubricant SAE 20
Bio-Ultimax™ 1000 Hydraulic Fluids SAE 10W40	Bio-SynXtra™ TC+ 2-Cycle Oil
Bio-Ultimax™ 1200LT Hydraulic Fluids (ISO 15, 22, 32, 46)	Bio-SynXtra™ TC-W3 2-Cycle Oil
Bio-Ultimax™ 1500 Dielectric Hyd Fluids ISO 46, 68, 22, 32 Altec Approved	Bio-Fleet™ TC+ 2-Cycle Oil
Bio-HVO2™ Hydraulic Fluids (ISO 32, 46, 68 FR)	Bio-Pro™ Bar & Chain Oils (SAE 10W30, 15W50)
Bio-Fleet™ Hydraulic Fluids (ISO 22, 32, 46, 68)	Bio-Saw Guide™ Oils (SAE 10W20, 10W30, 15W50, 20W60)
Bio-MIL-PRF-32073 ISO (15, 22, 32, 46, 68)	Bio-Penetrating Lubricant™ (BPL™)
Bio-PowerLift Hydraulic Fluid (ISO 15-22)	Bio-Blast™ Penetrant (Low Surface Tension)
Bio-AW Turbine™ R&O Fluids (ISO 22, 32, 46, 68, 100)	Bio-Penetrating Lubricant™ (BPL™ Food Grade H1) Plus Tack
Bio-SynXtra™ Hydra-Gear Fluids (ISO 46, 68, 100, 150, 220, 320, 680, 1000)	Bio-Parts Cleaner/Degreaser™ (Food Grade H1)
Bio-SynXtra™ EP Gear Oils (ISO 46, 68, 100, 150, 220, 320, 680, 1000)	Bio-Parts Cleaner/Degreaser™ LFLV (Food Grade H1)
Bio-EP™ Gear Oils (ISO 46, 68, 100, 150, 220)	Bio-Parts Cleaner/Degreaser™ (plus Corrosion Protection)
Bio-Drip™ Oil (SAE 10W20, 10W30)	Bio-Slide Way™ Lubricants (ISO 32, 68, 220)
Bio-Air Tool™ Lubricants (ISO 15, 22, 32)	Bio-General Purpose™ Cut 30 & 40
Bio-Rock Drill™ Oils (SAE 10W20, 10W30, 15W50, 20W60)	Bio-Aluminum™ Cutting Oil 4 & 18 cSt (Food Grade)
Bio-EP™ Wire Rope (SAE 10W20, 10W30, 15W40, 15W50, 20W60)	Bio-Syntra™ LM Cutting/Honing Oil (ISO 10, 15, 22)
Bio-Chain & Cable™ Lubricants (SAE 10W20, 10W30, 15W50, 20W60)	Bio-Syntra™ 32, Bio-SynXtra™ 46, Bio-SynXtra™ LV 22 Metal Working
Bio-EP™ Wire Rope Compound	Bio-Acid Fume™ Rust Preventative Fluids
Bio-High Temp™ 180 EP Grease NLGI-2	Bio-Medium Preservative™ Lubricants (Meets MIL-PRF-3150D)
Bio-Food Grade™ EP Grease NLGI 2, 1, 0, 00	Bio-Concrete™ Mold Release Fluids
	Bio-EP™ Track Lubricant (ISO 100)
	Bio-SynXtra™ High Temperature Lubricants (ISO 68, 100, 150, 220)

Respectfully submitted,

Jacqueline Garmier, President