2013 Vessel General Permit Update
Section 2.2.9 Lubricants

RVOC Meeting – University of Washington
April 28 – 30, 2015
VGP Requirements Review
Fundamental Requirements

• December, 2013 Vessel General Permit went into effect

• Required EALs in all oil-to-sea interfaces and on equipment subject to immersion.

• Provided 4 exemptions:
  • Availability
  • Pre-lubricated
  • OEM Approvals
  • Dry-Dock

• Has a reporting requirement

• Has an inspection component (MOU with USCG)
EAL Standards and Availability

- Standards set in Appendix A
  - Biodegradable
  - Minimally Toxic
  - Non-Bioaccumulating

- Manufacturers can self-certify

- Labeling option
  - EU Eco Label
  - DfE
  - Swedish Swan

- Several major suppliers now available
Implementation Update
Depends on the Application

- Stern Tubes / Propeller Shafts / Stabilizers
  - Most major suppliers have approved one or more EALs
  - None oil-to-sea options available

- CPP Propellers
  - Hydraulic systems
  - Gear / Hydraulic systems
  - Grease lubricated push/pull systems

- Z-Drives and Tunnel Thrusters
  - For new orders, beginning to see approvals
  - For existing equipment, service review process

- Rudder bearings / Propeller Caps

- General Deck Applications

- Equipment subject to immersion including wire rope

- Deck Hydraulic systems
What should you be prepared for / working on?

- Have a plan
- Know which applications need / want to address
- Assess compatibility
- Review OEM approvals
- Analyze performance expectations of lubricants
- Ensure proper change over / set up sample analysis program for gear oil and stern tube oil
- Maintain proper documentation and file annual report
- Proceed cautiously
- Be aware of changes to the regulation
  - 5 year permit
  - S 373
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