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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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