

October 20, 2017

2013 Vessel General Permit (VGP) Compliance Declaration

RSC *EnviroLogic*[®] and RSC *FUTERRA*[™] products are designated as Environmentally Acceptable Lubricant (EAL) according to the definitions and requirements of the US EPA 2013 Vessel General Permit (VGP).

US EPA's revised VGP permit went into effect for all vessels over 79 feet on December 19th, 2013. The US Environmental Protection Agency (EPA) requires that all vessels use an "Environmentally Acceptable Lubricant" (EAL) in oil to water interfaces unless technically infeasible. The VGP revision also requires any above water line hull cleaning or deck washdowns resulting in discharge to be conducted with "minimally-toxic" and "phosphate free" cleaners and detergents as defined in Appendix A of the permit. The permit further requires cleaners and detergents to be non-caustic and biodegradable. It is expected that most vessels seeking coverage under this permit will be greater than 79 feet in length; however, commercial fishing vessels and other non-recreational vessels less than 79 feet are also eligible for permit coverage under this permit or those vessels may seek coverage under EPA's small Vessel General Permit (sVGP), as available and appropriate.

RSC *FUTERRA*[™] and RSC *EnviroLogic*[®] Hydraulic, Stern Tube and Thruster Oils, Gear Oil/Greases and SAFECARE[®] Cleaners and their constituent components have been evaluated by independent laboratories and the test results confirm RSC Bio Solutions products meet the 2013 VGP definition and requirements. RSC *FUTERRA* HF Series is Ecolabel certified, and in addition to RSC *EnviroLogic* EALs and SAFECARE cleaners and constituent substances, they are "Biodegradable", "Minimally Toxic" and "Not Bioaccumulative".

RSC *FUTERRA*[™] and RSC *EnviroLogic*[®] EALs are suitable, proven and approved for a wide range of applications including controllable pitch propellers, thruster and hydraulic fluids and other oil-to-sea interfaces including lubrication discharges from stern tubes, thruster bearings, stabilizers, rudder bearings, azimuth thrusters, propulsion pod lubrication, wire rope and mechanical equipment subject to immersion. SAFECARE applications include deck and equipment wash, general purpose cleaning, degreasing, parts cleaning and oil stain removal.

RSC *FUTERRA*[™] HF Series include:

- FUTERRA HF 32, FUTERRA HF 46, FUTERRA HF 68 and FUTERRA HF 100





(continued)

RSC EnviroLogic® Hydraulic Fluid Series (HF and HF HP) include:

- RSC EnviroLogic HF 15, RSC EnviroLogic HF 22, RSC EnviroLogic HF 32, RSC EnviroLogic HF 46, RSC EnviroLogic HF 68, RSC EnviroLogic HF 100 and RSC EnviroLogic HF 15 HP, RSC EnviroLogic HF 22 HP, RSC EnviroLogic HF 32 HP, RSC EnviroLogic HF 46 HP, RSC EnviroLogic HF 68 HP and RSC EnviroLogic HF 100 HP

RSC EnviroLogic® Gear Oils include:

- RSC EnviroLogic GO 68, RSC EnviroLogic GO 100, RSC EnviroLogic GO 150, RSC EnviroLogic GO 220, and RSC EnviroLogic GO 320

RSC EnviroLogic® Greases include:

- RSC EnviroLogic Grease 0, RSC EnviroLogic Grease 1, RSC EnviroLogic Grease 2, RSC EnviroLogic Grease 2 WREP

If you have additional questions or comments, please feel free to contact me at 704-684-1802.

Sincerely,

A handwritten signature in black ink that reads "Larry G. Beaver". The signature is written in a cursive, flowing style.

Larry G. Beaver, Ph.D.

Vice President, Research & Development

SAFECARE® is a registered trademark of Gemtek Products, LLC.

