BioBlend Renewable Resources, LLC
2250 Arthur Avenue
Elk Grove Village, IL 60007
630.227.1800 P
630.227.1801 F
bioblend.com

VGP COMPLIANCE DECLARATION

BioBlend Renewable Resources, LLC hereby certifies the products listed below to be Environmentally Acceptable Lubricants (EALs) that meet the definitions and requirements set forth in the US EPA 2013 Vessel General Permit:

BioFlo AW (32, 46, 68)
BioFlo AWS (32, 46)
BioFlo HEES (46)
BioFlo HFDU (40, 46, 68)
BioGear EP (68, 100, 150, 220)
BioGear S (220, 320, 460)
BioBlend MPO
BioFlo STL (68, 100, 150)
BioLube C&C-P (32, 46)
BioLube WRL
BioGrease HD (1,2)
BioGrease GP (00, 0, 1)
BioGrease M3
SynGrease XT

GUIDELINES & DEFINITIONS

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 bioaccumulative" as defined in Appendix A of the permit.

VGP Appendix A Definitions:
Environmentally Acceptable Lubricants: means lubricants that are "biodegradable" and "minimally-toxic," and are "not bioaccumulative" as defined in the permit. For purposes of the VGP, products meeting the permit's definitions of being an "Environmentally Acceptable Lubricant" include those labeled by one of several outside programs (Blue Angel, European Ecolabel, Nordic Swan, Swedish Standards SS15534 and SS155470, OSPAR, and EPA's DfE as defined in the permit.

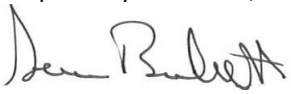
Biodegradable: Regarding environmentally acceptable lubricants and greases, biodegradable means lubricant formulations that contain at least 90% (w/w (weight in weight concentration)) or grease formulations that contain at least 75% (w/w) of a constituent substance or constituent substances (only stated substances present above 0.10% shall be assessed) that each demonstrate either the removal of at least 70 percent of dissolved organic carbon, production of at least 60 percent of the theoretical carbon dioxide, or consumption of at least 60 percent of the theoretical oxygen demand within 28 days. Acceptable test methods include: Organization for Economic Co-operation and Development Test Guidelines 301 A-F, 306, and 310, ASTM 5864, ASTM D-7373, OCSPP Harmonized Guideline 835.3110, and International Organization for Standardization 14593:1999. For lubricant formulations, the 10% (w/w) of the formulation that need not meet the above biodegradability requirements, up to 5% (w/w) may be nonbiodegradable (but not bioaccumulative) while the remainder must be inherently biodegradable. For grease formulations, the 25% (w/w) of the formulation that need not meet the above biodegradability requirement, the constituent substances may be either inherently biodegradable or non-biodegradable, but may not be bioaccumulative. Acceptable test methods to demonstrate inherent biodegradability include: OECD Test Guidelines 302C (>70% biodegradation after 28 days) or OECD Test Guidelines 301 A-F (>20% but <60% biodegradation after 28 days).

Minimally-Toxic: Means a substance must pass either OECD 201, 202, and 203 for acute toxicity testing, or OECD 210 and 211 for chronic toxicity testing. For purposes of the VGP, equivalent toxicity data for marine species, including methods ISO/DIS 10253 for algae, ISO TC147/SC5/W62 for crustacean, and OSPAR 2005 for fish, may be substituted for OECD 201, 202, and 203. If a substance is evaluated for the formulation and main constituents, the LC50 of fluids must be at least 100 mg/L and the LC50 of greases, two-stroke oils, and all other total loss lubricants must be at least 1000 mg/L. If a substance is evaluated for each constituent substance, rather than the complete formulation and main compounds, then constituents comprising less than 20 percent of fluids can have an LC50 between 10-100 mg/L or a no observed effect concentration (NOEC) between 1-10 mg/L, constituents comprising less than 5 percent of fluids can have an LC50 between 1-10 mg/L or a NOEC between 0.1-1 mg/L, and constituents comprising less than 1 percent of fluids can have an LC50 less than 1 mg/L or a NOEC between 0-0.1 mg/L.

Non Bio-Accumulative:
- means the partition coefficient in the marine environment is log KOW <3 or >7 using test methods OECD 117 and 107
- molecular mass >800 daltons,
- molecular diameter >1.5 nanometer,
- BCF or BAF is <100 L/kg, using OECD 305, OCSPP 850.1710 or OCSPP 850.1730, or a field-measured BAF or
- Polymer with MW fraction below 1,000 g/mol is <1%.

VGP Section 4.2 – Record Keeping: Vessel must keep records on the vessel that include the Product Data Sheets (PDS) and Safety Data Sheets (SDS) for all EAL's used in Oil-to-Sea interfaces on board the vessel in order to prove compliance with the permit.

Respectfully submitted,



Samuel W. Burkett
President
Date: February 2, 2017