

VGP compliance declaration – Mobil SHC™ Aware™ Grease EP 2

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Mobil SHC™ Aware™ Grease EP 2 is designated an Environmentally Acceptable Lubricant (EAL) according to the definitions and requirements of the US EPA 2013 Vessel General Permit (VGP).

EAL definition

An EAL, as defined in Appendix A of the permit, must be 'biodegradable', 'minimally toxic' and is 'not bioaccumulative'. All vessels must use an EAL in all oil-to-sea interfaces, unless technically infeasible.

Independent laboratories have evaluated Mobil SHC Aware Grease EP 2 and its components. Using these test results, ExxonMobil has determined that it meets the VGP definition of an EAL.

Biodegradability/bioaccumulation

The VGP definitions of 'biodegradable' include grease formulations that contain at least 75 per cent by weight of a constituent substance, or constituent substances, that give a minimum test result of 60 per cent biodegradation within 28 days, according to OECD 301B.

The 25 percent of the formulation that need not meet the biodegradability requirements may be inherently biodegradable or non-biodegradable (but not bioaccumulative).

Acceptable methods to demonstrate non-bioaccumulation include OECD 107 and OECD 117. The requirements for bioaccumulation only apply to non-biodegradable constituent substances.

In order to comply with the 2013 VGP biodegradability/bioaccumulation requirement, it is necessary to consider the constituent substances. Only substances present in the formulation above 0.10 per cent need be assessed.

The constituent substances of Mobil SHC Aware Grease EP 2 meet these requirements.

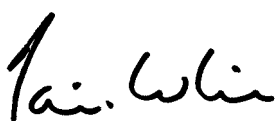
Minimally toxic

The VGP definitions for 'minimally toxic' fluids include achieving acute toxicity results of at least 100 mg/L according to OECD 201, 202, and 203 (algae, daphnia and fish).

Mobil SHC Aware Grease EP 2 meets these requirements.

Record keeping

All vessels must keep records on board, including the technical data sheets for all EALs used in oil-to-sea interfaces, in order to prove compliance with the permit.



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