

# VGP compliance declaration – Mobil SHC™ Aware™ Gear

Energy lives here™

Mobil SHC™ Aware™ Gear is designated as 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™ Gear 68 and Mobil SHC™ Aware™ Gear 100 and their 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 lubricant formulations that contain at least 90 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.

For the ten per cent of the formulation that need not meet the biodegradability requirements, up to five per cent may be non-biodegradable (but not bioaccumulative) while the remainder must be inherently biodegradable.

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 Gear meet these requirements.

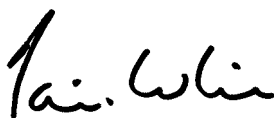
## **Minimally toxic**

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 Gear 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.



Iain White  
Global Marketing Manager  
ExxonMobil Marine Fuels and Lubricants - July 2015