



## VGP Compliance Declaration—**Strancore**

**Strancore** is an Environmentally Acceptable Lubricant (EAL) according to the definitions and requirements of the US EPA 2013 Vessel General Permit, as described below.

### **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 bio-accumulative” as defined in Appendix A of the permit.

### **Environmentally Acceptable Lubricant Definition – VGP Appendix A**

In order to be classified as an “Environmentally acceptable lubricant” the oil maker must determine that the lubricant is “biodegradable,” “minimally-toxic” and “not bio-accumulative” as defined in Appendix A of the permit. Alternatively, oils that are labeled by one of several programs specified in the permit are regarded as acceptable.

**Strancore** and its components have been evaluated and meets the VGP definition of an Environmentally Acceptable Lubricant.

#### **Biodegradability / Non Bioaccumulative – VGP Appendix A**

The VGP definitions of “Biodegradable” include grease formulations that contain at least 75% by weight of a constituent substance or constituent substances that give a minimum test result of 60% according to OECD 301B. The 25% of the formulation that need not meet the above biodegradability requirements may be inherently biodegradable or non-biodegradable (but not bio-accumulative). Acceptable test methods to demonstrate inherent biodegradability include >20% according to OECD 301B.

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% need be assessed.

The constituent substances of **Strancore** meet the above requirements.

#### **Minimally Toxic – VGP Appendix A**

The VGP definitions for “Minimally-Toxic” greases include achieving acute toxicity results of at least 1000 mg/L according to OECD 201, 202, and 203 (Algae, Daphnia and Fish).

**Strancore** meets the above requirements.

### **Record Keeping –VGP Section 4.2**

Vessel must keep records on the vessel that include the Technical Data Sheet for all EALs used in Oil-to-Sea interfaces on board the vessel in order to prove compliance with the permit.