GRIGNARD

VGP Compliance Delaration – **OLL D-2**

OLL D-2 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.

OLL D-2 and its components have been evaluated and meets the VGP definition of an Environmentally Acceptable Lubricant.

Biodegradability / Not Bio-accumulative – VGP Appendix A
The VGP definitions of "Biodegradable" include grease formulations that contain at least 75% by weight of a 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 / not bio-accumulative 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 **OLL D-2** meet the above requirements.

Minimally Toxic – VGP Appendix A
The VGP Definitions for "Minimally-Toxic" greases include achieving acute toxicity results of at least 1,000 mg/L according to OECD 201, 202, and 203 (Algae, Daphnia and Fish).

OLL D-2 meets the above requirements.