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### Service Update: Demonstrating Sulphur Compliance

The change of the ECA-SOx fuel oil sulphur limit to 0.10% from 1 January this year has generally resulted in a switch to using distillate grade fuel oils as opposed to the sulphur controlled residuals used previously. The authorities, port State control, and others are well aware of the impact that this change has had in terms of ECA-SOx compliance - on costs, on the cost differential between ECA-SOx fuel and those used elsewhere, and on the additional workload involved in changing between the different fuel types.

Consequently, in order to counter any tendency towards operators considering non-compliance as an option, there have been definite moves, on the part of authorities, towards a greater emphasis on the checking of ECA-SOx compliance. The FOBAS bulletin issued in January highlighted the new US EPA Penalty Policy in the case of ECA-SOx violations. Now the European Commission has issued the requirements\*, which EU Member States will be required to follow with respect to inspections related to the verification of compliance with the Sulphur Directive, which incorporates the SOx controls of MARPOL Annex VI.

Therefore, all ships, and certainly those operating inside either ECA-SOx or EU waters, must expect to be subjected to sulphur inspections of increased frequency and rigour. To prepare for these, and to facilitate the demonstration of the necessary compliance, FOBAS would recommend that operators-

- ensure that all bunker delivery notes for the past 3 years are onboard ship, accessible, and filed in an orderly manner so that they can be readily cross matched to any bunkering entry over that period in the Oil Record Book
- maintain up-to-date records relating to MARPOL Samples and make those samples available to be released to inspectors on request
- maintain an up-to-date the ship's sulphur log, such as the FOBAS Sulphur Record book, which includes blank mandated ECA-SOx entry and exit change-over record log forms for completion by the ships' crew
- ensure appropriate dedicated sampling connections are installed in the fuel oil service system (suitably labelled), so that truly representative spot samples of the fuel oil being used can be readily obtained.

As the EU's inspection regime as now defined, stipulates that at a set proportion of the inspections undertaken samples of the fuel being used are to be obtained directly from the relevant tanks/points, the ability to draw samples as required will be necessary. Therefore FOBAS recommends that ships prepare for this by ensuring that suitable sampling points are available and duly marked on the fuel oil arrangement plan. Approval by the ship's Class will be required in terms of safety, materials, connections, and fittings. However, it is up to the ships' engineering department to identify where, in the system, these are to be installed, taking into account cross connections, accessibility, and that the positions selected are clearly evident to any inspector as being well positioned to representatively sample from the flow of the fuel oil in use.

Indeed, it is greatly in the ship operators' interests to be able to offer sampling positions which are readily accessible to inspectors. Not only will this speed up the whole inspection process, but most importantly, should avoid samples from being drawn from unrepresentative positions. Samples being taken from unrepresentative positions can cause unnecessary delays and effort for all concerned.

For ships using only one sulphur grade of fuel oil, a single sampling point in the service system, typically positioned after the mixing column but before the booster pumps, would be sufficient.

However, where two sulphur grades of fuel oils (inside and outside ECA-SOx fuel oils) are used, samples drawn from the circulating section of the service system are potentially subject to contamination by previously used fuel oils and oily residues washed from the system piping walls and dead-legs. The frequency of fuel change-overs will have a major effect on the unpredictable degree of system clean-up being achieved. Hence, as recognised in the EU inspection requirements, in these instances a second sampling point should be installed on the rundown line from the ECA-SOx fuel oil service tank into the common service system.

In short – prepare, and prepare well, to be inspected.

\* Commission Implementing Decision (EU) 2015/253 which takes effect from 1 January 2016 applies to marine fuel oils, both as supplied to ships and that being used. For the full text of this decision, please follow the link below:

[http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOL\\_2015\\_041\\_R\\_0012](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOL_2015_041_R_0012)

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