

MARINE ENVIRONMENT PROTECTION  
COMMITTEE  
70th session  
Agenda item 9

MEPC 70/9/2  
17 August 2016  
Original: ENGLISH

## POLLUTION PREVENTION AND RESPONSE

### Guidelines for onboard sampling for the verification of the sulphur content of fuel oil used on board ships

Submitted by IMarEST

#### SUMMARY

*Executive summary:* This document provides comments on the safety of onboard fuel oil sampling required to be undertaken in accordance with the draft guidelines being considered at this session. Onboard fuel oil sampling is already a routine engine room task which, by the application of good engineering practice, is undertaken in a safe and secure manner.

*Strategic direction:* 7.3

*High-level action:* 7.3.1

*Output:* 7.3.1.1

*Action to be taken:* Paragraph 9

*Related documents:* MEPC 70/9 and PPR 3/21

#### Introduction

1 This document provides comments on the safety of onboard fuel oil sampling required to be undertaken in accordance with the draft *Guidelines for the onboard sampling of fuel oil* as given by paragraph 3.9 of document MEPC 70/9.

#### Discussion

2 PPR 3 considered document PPR 3/11 (Austria et al.) providing draft *Guidelines for onboard sampling and verification of the sulphur content of fuel oil used on board ships* and the outcome is to be considered for approval at this session. In the associated discussions at PPR, in both plenary and in the Air Pollution Working Group, concerns were raised as to the safety implications in respect of the onboard sampling of fuel oils that would be undertaken in accordance with those guidelines.

3 The Institute of Marine Engineering, Science and Technology (IMarEST) represents, amongst others within its membership, serving marine engineer officers. Since it will most often be those individuals who will be responsible for the actual drawing of any onboard fuel oil samples from a ship's machinery system IMarEST comments as follows.

4 The sampling of fuel oil from a ship's machinery systems is already a routine engine room task. As with all engine room tasks, provided that sampling is undertaken in accordance with good engineering practice and with due regard to the prevailing factors in each case, it will be undertaken in a safe and secure manner – albeit that the fuel oil will be under a certain pressure and may, in some instances, be at an elevated temperature.

5 In this regard it would be noted that the fuel testing services, which provide data to the IMO Sulphur Monitoring Programme and which have been in operation in some cases for more than 35 years, generally also investigate issues of suspected onboard fuel oil related problems. Those investigations will typically require fuel oil samples, often of residual fuel oils, to be drawn by the ship's engineers from the operating fuel oil piping systems including, in many cases, the fuel oil service system. Furthermore, those fuel testing services also provide audit services in respect of the performance of the fuel oil treatment equipment which again have, for decades, required the regular sampling of fuel oil from pressurized and heated operating systems.

6 Onboard sampling is facilitated by the installation of specific sampling points to the fuel oil piping systems and it is understood that these will be generally allowed subject to the respective rules of the relevant classification societies. In the case of, for example, Lloyd's Register's Rules (part 5, chapter 14, section 2.3) the provision of installed fuel oil sampling points, without specifying their position and purposes, have in fact been a class requirement for over a decade.

7 In those instances where specific sampling points are not fitted the ship's engineers, by their training, experience and application of good engineering practice, will be able to identify safe and suitable temporary sampling points, taking into account the prevailing conditions and other considerations such as control system connections.

8 In view of the above, IMarEST would advise the Committee that onboard fuel oil sampling can be undertaken in a safe and secure manner.

#### **Action requested of the Committee**

9 The Committee is invited to note the information provided above and to take it into account as appropriate in its consideration of the draft onboard fuel oil sampling guidelines as prepared by PPR 3.