

FOBAS Bulletin



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Additional Sample Analysis to Verify Compliance with Carb Regulation

The California Air Resources Board (CARB) has [announced](#) an additional measure to verify compliance with the CARB emission regulations for ocean-going vessels. According to the announcement, the primary driver to introduce such a measure is that a study has shown, although ships visiting CARB jurisdiction are complying with the fuel's sulphur requirements, many are not using distillate (DM) category fuels as required by California law, resulting in higher particulate emissions.

To ensure compliance, Air Resource Board staff, from May 2021 during inspections will seek to collect in-use fuel samples from the vessels. These samples are expected to be tested for standard ISO 8217 table 1 requirement but more specifically subjected to ISO 10370 "Determination of carbon residue – Micro method". This test is one of the important indicators to categorise a marine fuel as distillate or not.

The regulator issued an [advisory](#) in this respect which also outlines the practical steps to ensure compliance from the ship operator. Operationally, there is more emphasis on the change-over time being sufficient to ensure that flushing has been effective enough for a distillate sample drawn from the system not to be contaminated from the residual fuel. In case of doubt, further guidance should be sought from the relevant port authorities. Records should be kept up-to-date relating to any necessary fuel oil change-overs, recording the date and time of entering and exiting the emission control area. Also, it is recommended that the relevant bunker delivery notes should be retained for compliance verification.

If you require any further information about this Bulletin, please contact us at fobas@lr.org or speak to one of our consultants on +44 (0)330 414 1000 (Southampton UK), +44 (0)1642 440991 Redcar (UK), +65 3163 0888 (Singapore), +30 211 990 7732 (Greece). For anything urgent, please contact us via our out of office number, +44 (0)1642 425660.