Lloyd`s Classification Limited

Circular Information

Circular No.: CIR2021-1
Date: 12 May 2021

Subject
Fitting or designating the fuel oil sampling points

To whom it may concern

Please be advised that an amendment to MARPOL Annex VI related to fuel oil sampling and verification procedures for the sulphur content of fuel oil was adopted as Resolution MEPC.324(75) at the 75th session of the Marine Environment Protection Committee (MEPC75) held in November 2020, and these amendments are scheduled to enter into force on 1 April 2022.

This amendment adds the following new terms "In-use sample" and "On board sample".
- In-use sample: A sample drawn from the fuel oil supply system downstream of the fuel oil service tanks, meaning a sample of fuel oil in use on the ship.
- On board sample: A sample drawn from the fuel oil transfer system from the fuel oil storage tank to the fuel oil setting tank or from the fuel oil settling/service tank, etc., meaning a sample of fuel oil intended to be used or carried for use on board the ship.

Technical information related to the fitting or designation of sampling points for in-use samples is as follows.

1. Application
Fuel oil supply systems (excluding low-flashpoint fuel oil supply systems) for all new and existing ships (including platforms and drilling rigs)

2. Application date
(1) For ships the keel of which is laid or which is at a similar stage of construction on or after 1 April 2022, registration surveys during construction.
(2) For ships the keel of which is laid or which is at a similar stage of construction before 1 April 2022, the first IAPP renewal survey carried out on or after 1 April 2023

3. Fitting or designating of fuel sampling points
Fuel oil sampling points are required to be fitted or designated for the purpose of taking representative samples of the fuel oil being used on board the ship, taking into account MEPC.1/Circ.864/Rev.1.
The requirements for sampling points required by MEPC.1/Circ.864/Rev.1 are as follows:
(1) be easily and safely accessible;
(2) take into account different fuel oil grades being used for the fuel oil combustion machinery item;
(3) be downstream of the in-use fuel oil service tank;
(4) be as close to the fuel oil combustion machinery as safely feasible taking into account the type of fuel oil, flow-rate, temperature, and pressure behind the selected sampling point;
(5) be clearly marked for easy identification and described in either the piping diagram or other relevant documents;
(6) each sampling point should be located in a position shielded from any heated surface or electrical equipment and the shielding device or construction should be sturdy enough to endure leaks, splashes or spray under design pressure of the fuel oil supply line so as to preclude impingement of fuel oil onto such surface or equipment; and
(7) the sampling arrangement should be provided with suitable drainage to the drain tank

or other safe location.

4. Plan approval

Plan approval is necessary in cases where fitting sampling point modifications are needed for the ships mentioned in 2. (2) above. Fuel oil piping diagrams related to any modification plans should be submitted to the Class LC Machinery Department for approval prior to the commencement of any modification work. Class LC will approve fuel oil piping diagrams showing only the designation of the fuel sampling points upon request. All plans (including a mailing address and a billing address) should be submitted to the Class LC Machinery Department by LC-PASS, email or regular mail.

5. Survey

(1) Class survey for modification

The following surveys related to modifications are required for the ships mentioned in 2. (2) above in cases where modifications are made.

a) Visual inspection of modified installations

b) Leak test for fuel oil piping

Survey applications should be submitted together with the approved plans to the Class LC service site in charge of the survey.

(2) Statutory survey

When sampling points are fitted in accordance with the above-mentioned modification, or sampling points are designated by fuel oil piping diagrams or caution plates, etc. without any modification, surveyors are to confirm that the ship complies with relevant requirements.

Survey applications should be submitted to the Class LC service site in charge of the survey no later than the first IAPP renewal survey on or after 1 April 2023.

The above-mentioned survey is to be conducted at the time of construction for ships mentioned in 2. (1) above.

6. Re-writing to the new form of the supplement to the IAPP Certificate

The form for the supplement to the IAPP Certificate will be replaced, and items related to the fitting or designating of the sampling points will be added. The certificate will be replaced with the new form at the time of issuance or written onto the certificate on or after 1 April 2022 (i.e. the effective date).

In addition, after the completion of survey mentioned in 5(2) above, the checkbox in paragraph 2.3.4 of the new form of the Supplement to IAPP Certificate will be ticked off.

As for onboard samples taking into account MEPC.1/Circ.889, the fitting and designating of sampling points are not required.

For further details, please refer to the attached IMO resolutions MEPC.324(75), MEPC.1/Circ.864/Rev.1 and MEPC.1/Circ.889.