



L P Bulletin

Friday 16th September 2011

Bulletin 785 - 09/11 - Fuel Switching Safety - Worldwide

With reference to the United States Coast Guard (USCG) Marine Safety Alert 11-01 the Club wishes to reiterate advice given in the previous Bulletin 645 to increase awareness to potential claims that may arise from fuel switching issues.

The Sulphur Emissions Control Area (SECA) off the European North West coast has been in effect for many years and has helped with the reduction of harmful emissions in that area. Following on from that success a joint United States, Canadian and French effort to develop a similar Emission Control Area (ECA) extending 200 miles off the coast of the North American continent is underway. It is probable that similar ECAs may appear elsewhere around the world in the future.

A vessel entering and exiting such an area will be required by law to switch between heavy or intermediate bunker fuels and a more refined distillate fuel. This process carries with it certain risks which can lead to claims

It is possible that complications may occur to the vessel's main power plant during this switch over period resulting in the vessel experiencing delays or, in extreme circumstances, having to divert to effect repairs.

If the fuel supply is interrupted the vessel may encounter problems maintaining propulsion or may experience a blackout. The sudden loss of power may contribute to a vessel running aground, causing a collision or contacting with port infrastructure.

There is also the possibility of claims arising from Port State Control inspections as fines may be levied against the vessel for incorrect or inaccurate record keeping of the switch over process. This operation is one which must be properly recorded in the Oil Record Book, Log Books or in another Record Book as approved by the Administration.

The Club has issued general guidance for Oil Record Book entries recently through [Technical Bulletin 35: Oil Record Book entries](#).

In their Marine Safety Alert the USCG noted that they had recorded a recent increase in incidents after vessels lost propulsion and has linked many of these incidents to vessels operating on marine distillate fuels. It is with this concern in mind the Club issues this Bulletin to help prevent this trend from propagating.

The USCG Marine Safety Alert goes further to recommend the following considerations;

- Consult engine and boiler manufacturers for fuel switching guidance;
- Consult manufacturers to determine if system modifications or additional safeguards are necessary for intended fuels;
- Develop detailed fuel switching procedures;
- Establish a fuel system inspection and maintenance schedule;
- Ensure system pressure and temperature alarms, flow indicators, filter differential pressure transmitters, etc., are all operational;
- Ensure system seals, gaskets, flanges, fittings, brackets and supports are maintained and in serviceable condition;
- Ensure a detailed system diagram is available;
- Instigate a comprehensive continued onboard training programme;
- Exercise tight control when possible over the quality of the fuel oils received;
- Have consideration to restricted waters or dense traffic lanes when completing fuel switching;
- Test main propulsion machinery, ahead and astern, while on marine distillates.

Additionally, the following guidance may assist vessel owners and operators in preventing propulsion losses when operating on marine distillates:

- Have due regard to accelerated wear of engine/fuel system components and evaluate maintenance period intervals accordingly;
- Ensure fuel viscosity does not drop below engine manufacturer's specifications;
- Ensure proper heat management of fuel systems to maintain minimum viscosity values;
- Make appropriate fuel rack adjustments to account for potential fuel pressure differentials between residual fuel oils and marine distillates;
- Have due regard to the vessels performance whilst running on distillate fuel;
- Ensure start air supply is sufficient and fully charged prior to manoeuvring.

Source of Information:

Loss Prevention
UK P&I Club
lossprevention.ukclub@thomasmiller.com