

EPA Guidance on Use of Distillate Fuel for North American ECA Compliance

Question: Does EPA require the use of 15ppm ULSD or other low viscosity marine fuel oils for compliance with the 1.00% fuel sulfur ECA standard?

Answer: While distillate fuels meet the definition of a fuel oil, and therefore using distillate fuel can clearly be an option to meet the 1.00% fuel sulfur ECA standard, EPA believes it is clear that the MEPC did not intend vessels to use straight distillate fuels (fuels with a viscosity below 11 Centistokes) to meet the 1.00% sulfur ECA standard. The technical analyses relied upon by MEPC consistently assumed that a fuel sulfur standard of 0.5% would define the split between residual fuels and distillate fuels and the MEPC consistently assumed that above 0.5% would be a residual fuel or residual fuel blend, while below 0.5% would be primarily made up of distillate fuels. In addition, distillate fuels below 1.00% sulfur are widely available in ports throughout the world and have been and are used regularly by vessels for a variety of purposes. Given this wide availability and use, there would have been no need for the Regulation 18 fuel availability provisions in Annex VI if the MEPC intended vessels to use a widely available fuel to meet the 1.00% sulfur ECA standard. Finally, requiring vessels to use widely available distillate fuel would simply advance the distillate standard set to begin in 2015.