

Guidance for Fuel Oil Certifications

Conformance with permitted percent sulfur limits can be demonstrated by sampling and analyzing each fuel oil shipment according to the procedures described in Section 5.2.2.3 of 40CFR Part 60, Appendix A, Reference Method 19 or by the fuel supplier certification procedure described below. It is not the intent of the Department for end-users, oil jobbers, etc. to conduct any sulfur analyses but to obtain the required information from primary suppliers such as oil terminals or pipeline suppliers.

Fuel supplier certification shall include the following information:

For distillate oil with permitted sulfur limits $\geq 0.05\%$:

- a) The name of the oil supplier; and
- b) A statement from the oil supplier that the oil complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM Method D975¹.

For distillate oil with permitted sulfur limits $\geq 0.5\%$:

- a) The name of the oil supplier; and
- b) A statement from the oil supplier that the oil complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM Methods D396¹ or ASTM D975¹.

For all other distillate or residual oils, distillate oils with permit limits $< 0.05\%$ sulfur, or if facilities do not wish to purchase 0.05% or 0.5% sulfur fuel:

- a) The name of the oil supplier;
- b) The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location;
- c) The date the sample was collected;
- d) The date the sample was analyzed;
- e) The name and address of the laboratory conducting the analysis;
- f) The sulfur content² of the oil from which the shipment came (or of the shipment itself); and
- g) The analytical method³ used to determine the sulfur content of the oil.

¹ ASTM D396 and ASTM 975 are primarily used by purchasing agents to confirm that fuel oils meet certain specifications, one of which is that the sulfur content does not exceed 0.5% and 0.05%, respectively. Other methods may be used for sulfur determination but the sampling and analytical procedures must be approved on a case-by-case basis.

² The Department may require QA/QC audits of residual oil shipments if the analysis indicates a sulfur content > 90% of the permitted limit. These audits will be conducted semiannually and must be taken prior to loading into the end consumer's bulk tank. The samples must be analyzed by a laboratory that is not owned in whole or part by the supplier. The analysis must be conducted according to the procedures described in section 5.2.2.3 of 40 CFR Part 60, Appendix A, Reference Method 19. These semi-annual QA/QC audits must be included with each quarterly, semiannual, or annual sulfur emission report submitted to the Bureau.

³ Since ASTM D396 and ASTM 975 are not expressly sulfur quantification methods, they are not appropriate for permitted sulfur limits <0.5% or >0.5%. Some acceptable sulfur quantification methods are: ASTM D129, ASTM D1552, ASTM D1266, ASTM D2622, and ASTM D4294.