



**Questions**

**Responses**

(As of February 2020)

Will compliant bunkers be available in your jurisdiction?

1

Yes, local vendors should be contacted to confirm.

Which government body or organization issues fines for sulphur violations?

2

Environmental Protection Agency (EPA)

What is the estimated potential value of fines?

3

EPA would determine.

Is there a possibility of criminal action for sulphur violations?

4

Each situation is evaluated on a case-by-case bases. EPA would determine.

Can a ship be detained for violations?  
If so, will a club LOU be accepted to secure its release?

5

Detained, yes. An LOU would only be required if a civil penalty is assessed.

Is it possible to appeal fines?

6

USCG COTP orders and IMO detentions may be appealed. EPA would be contacted to determine appeal options for civil penalties issued by their agency.

What contingency measures are available for ships carrying non-compliant fuel.

7

Vessels are required to follow MARPOL and appropriate Federal/ State regulations. Any accepted contingencies would be listed there.

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