



VISWA LAB

12140 Alameda Road,
Houston, Texas 77045, USA

Tel: USA (713) 842-1985
Fax: USA (713) 842-1981
Email: techupdate@viswalab.com
Web: <http://www.viswalab.com>

TECHNICAL UPDATE: 2010/3/8

COMMENTS ON ISO 4259 IN FINAL DRAFT OF ISO 8217:2010 ANNEX L

Viswa Lab has commented on ISO 4259 in our technical update 2009/12/28 - ISO 8217 2010 DRAFT UPDATE. Therein, Viswa Lab had commented that the benefit of the test precision should not be passed on to the supplier. This is the stand MEPC has taken in the case of sulfur content for ECA areas. MEPC had ruled that the sulfur should be 1.50% or less and no variation on this will be permitted.

Based on Annex L of ISO 8217:2010 on this topic, a supplier can supply, for a 380 cSt grade fuel, a viscosity which can vary from 363.4 cSt to 396.59 cSt at 50 degC. While this large variation will not matter in the case of viscosity from a functional point of view, on other parameters, this will make a significant difference. For instance, the catfines which are now pegged at 60 ppm can be as high as $60 + 0.59 R$ which is equal to $60 + 11.84$ ppm which is 71.84 ppm. This practically brings the catfine level to the old 8217:2005 standard of 80 ppm. This is why Viswa Lab is insisting that the benefit of the variation on the higher side should not be made available to the supplier. The only reason for making this suggestion is to improve the quality of the bunker fuel supplied. After all, we believe, this is also the intention of ISO with each revision of its standard.

Apart from the above, on page 28 of the same Annex L, the statement in the standard is "Therefore the supplier can consider that the product meets the specifications with 95% confidence, if the single test result is less than or equal to 363.4 at 50 degC." We feel the words used should be "fails to meet" NOT "meets". The phraseology in Annex L has been copied from ISO 4259. It is possible that our understanding is incorrect or the phraseology in ISO 4259 is incorrect.

We request ISO to look into this.

Please do not hesitate to contact us with any questions.

Best regards,
Dr.Vis