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**TANK CLEANING ADDITIVES GUIDANCE NOTE AND REPORTING FORM FOR THE
SUBMISSION OF TANK CLEANING ADDITIVES DATA**

1 The Marine Environment Protection Committee, at its thirty-third session, adopted amendments to the Standards for Procedures and Arrangements for the Discharge of Noxious Liquid Substances which included restriction on the types of detergents used in tank washing as follows:

“1.8.2 When small amounts of detergents are added to water in order to facilitate tank washing, no detergents containing pollution category A components should be used except those components that are readily biodegradable and present in a total concentration of less than 10%. No restrictions additional to those applicable to the tank due to the previous cargo should apply.”

2 The Committee, at its thirty-seventh session, noted that there were problems in applying the Guidelines for the Evaluation of the Hazards of Cleaning Agents as developed by the Sub-Committee on Bulk Chemicals (BCH 24/15, annex 5) and so authorized their revision.

3 The Committee, at its forty-third session, approved the revised Guidelines which includes a guidance note and product reporting Form for the submission of data on the evaluation of cargo tank cleaning additives.

4 Member Governments are invited to bring this information to the attention of those companies submitting data on tank cleaning additives to the BLG Sub-Committee in order to determine whether they meet the requirements of paragraph 1.8.2 of the Procedures and Arrangements Standards.

ANNEX

TANK CLEANING ADDITIVES GUIDANCE NOTE AND REPORTING FORM FOR THE SUBMISSION OF TANK CLEANING ADDITIVES DATA

INTRODUCTION

A tank cleaning additive is a product used for the cleaning of cargo tanks and associated piping systems on ships carrying noxious liquid substances and is used by adding it to the washwater in small amounts.

The use of cleaning additives must be recorded in the Cargo Record Book as stated in Appendix IV to Annex II of MARPOL 73/78, "List of items to be recorded," (E) 15.2.

Tank cleaning additives are evaluated by the Sub-Committee on Bulk Liquids and Gases (BLG) in order to protect the marine environment from adverse effects related to their use.

It is not the intention of the evaluation to determine the efficacy of the products, but rather to determine their environmental acceptability.

This document contains a guidance note and a form to facilitate the submission of data by manufacturers. This is intended to ease the process of evaluation of tank cleaning additives.

Paragraph 1.8.2 of the Standards for Procedures and Arrangements under Annex II of MARPOL 73/78, forms the basis upon which cleaning additives are evaluated. It reads as follows :

"When small amounts of cleaning detergents are added to water in order to facilitate tank washing, no detergents containing pollution category A components should be used except those components that are readily biodegradable and present in a total concentration of less than 10%. No restrictions additional to those applicable to the tank due to the previous cargo should apply."

GUIDANCE NOTE

1 The composition of the product should be fully specified, given that tank cleaning additives are evaluated on the basis of any individual ingredient. Components which have one or both of the following characteristics should not be used in tank cleaning additive formulations :

- .1 Components which are persistent and bioaccumulating to a significant extent and known to produce a hazard to aquatic life or human health.
- .2 Components which are severely toxic to marine life, i.e. those having an LC50 value of 0.1 ppm or less.

2 If active ingredients include pollution category A substances (according to the IBC Code, GESAMP Hazard Profile or provisional assessment), test data for ready biodegradability must be provided. The proportion of such ingredients must be less than 10% of the total product for the tank cleaning additive to be accepted. Substances not previously assessed must be tested for ready biodegradability, aquatic toxicity and bioaccumulation. For components that have not been evaluated previously by the above-mentioned bodies, aquatic toxicity should be investigated first. If shown to be below 1 mg / l, the component should then be tested for ready biodegradability.

.1 *Acute Aquatic Toxicity Data*

The test procedures for aquatic toxicity such as OECD 203, its ISO or other equivalents, should be used for soluble substances. For substances of low solubility, Annex 9 of IMO GESAMP Reports and Studies No. 35 should be followed. A marine or fresh water crustacean is considered to be suitable for such testing purposes (e.g., *Daphnia magna*, *Mysidopsis bahia*, *Chaetogammarus marinus* and *Acartia tonsa*). Existing data on fish or crustaceans would be acceptable for assessment.

.2 *Biodegradability Data*

The preferred test is a 28 day ready biodegradability test similar to OECD 301A to E, its ISO or other equivalents.

.3 *The Log Octanol Water Partition Coefficient*

This coefficient (Log Pow) is a predictive measure of the tendency of a substance to accumulate in the fatty tissues of an organism. It can be measured using OECD Guidelines 107 or 117, its ISO or other equivalents, or alternatively it can be calculated using fragmental constants (QSAR). If available, measured bioconcentration data are preferred.

3 If active ingredients include substances in pollution category B, C, D or appendix III (according to the IBC Code, GESAMP Hazard Profile or provisional assessment) the component would be acceptable. Unevaluated components would be acceptable, provided the acute toxicity is > 1 mg / l.

4 Components that are considered either Annex I or petrochemical complex mixtures of hydrocarbons will be evaluated using the procedure outlined in MEPC/Circ.265, based on the provisional assessment of hydrocarbon families.

5 The following procedures for submission of new cleaning additives are applicable:

- .1 Data on products to be evaluated by IMO should be made available to the national Administration involved, by means of the accompanying form.
- .2 The component names used on the form shall be the correct technical names, which means that trade names are not acceptable. Any trade named components must have their ingredients and their proportions fully specified.
- .3 The data shall be submitted at a period prior to the relevant IMO meeting, which is acceptable to the national Administration involved.
- .4 Incomplete data will not be taken into consideration.
- .5 All proprietary data will be treated as confidential by the national Administrations and their representatives, which form the evaluating group.
- .6 Any changes in names, composition or otherwise of any product which has passed the evaluation of IMO at an earlier occasion, shall be reported to the national Administration.

REPORTING FORM FOR THE SUBMISSION OF DATA FOR THE EVALUATION OF CARGO TANK CLEANING ADDITIVES

Part A. Confidential Data

Proprietary data will be treated as confidential by the national Administrations and their representatives which form the evaluating group within IMO. Continuation sheets may be used as needed.

Name of producing company :

Product name :

(as they are to appear in list of Tank Cleaning Additives meeting the IMO guidelines)

Component No.	Component name	CAS No.	Weight %	GESAMP Hazard Profile	IMO Pollution Category
1					
2					
3					
4					
5					
6					
7					
8					

Intended use of the product

Typical rate of dilution in washwater required for proper use of the product : %
(as stated by the manufacturer in the description of use)

ATTACH PRODUCT SPECIFICATIONS/USAGE INSTRUCTIONS*

To be used as a cargo tank cleaning *additive* : **yes** / **no** (omit if not applicable)

*This information does not restrict the use of this additive by a purchaser for other purposes.

Part B. Required information on components

- If category A components are involved, then biodegradation data should be supplied below.
- If products have not yet been evaluated by GESAMP, then all information requested below should be provided for each component.

ECOTOXICITY			
Component No.	Test species	LC50 in mg / l	Test method

BIODEGRADATION		
Component No.	Test method	% degradation in 28 days
Component No.	Test or calculation method	Log Pow / BCF

Date :

Signature and Title :
