IMO Circulars REVISED TANK CLEANING ADDITIVES GUIDANCE NOTE AND REPORTING FORM (MEPC.1/Circ.590/Rev.1)



Relevant for Owners, Managers, ICS Surveyors & Project Managers

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Introduction

The Marine Environment Protection Committee, at its fifty-second session, adopted the revised MARPOL Annex II by resolution MEPC.118(52), which, in regulation 13 on the control of discharges of residues of noxious liquid substances and specifically, in this context, includes restrictions on the cleaning additives permitted for use in cargo tank washing operations as follows:

"13.5.2 when small amounts of cleaning additives (detergent products) are added to water in order to facilitate tank washing, no additives containing Pollution Category X components shall be used except those components that are readily biodegradable and present in a total concentration of less than 10% of the cleaning additive. No restrictions additional to those applicable to the tank due to the previous cargo shall apply."

The following are the revised tank cleaning additives guidance note and reporting form, as approved by the Marine Environment Protection Committee at its eighty-second session (30 September to 4 October 2024), which provides information to Administrations and manufacturers of cargo tank cleaning additives to assist them when submitting products for assessment as cargo tank cleaning additives under MARPOL Annex II for inclusion in annex 10 to the MEPC.2 circular on Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code (MEPC.2/Circular).

This circular revokes MEPC.1/Circ.590.



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

A cleaning additive evaluated under this guidance is intended for the cleaning or preparation of cargo tanks and associated piping systems on ships certified to carry noxious liquid substances in bulk under Annex II of MARPOL. Cleaning additives (detergent products) are pure products or their solutions or mixtures added to the wash water in small amounts in order to facilitate tank washing.

Cleaning additives are evaluated by the ESPH Technical Group in order to determine the environmental acceptability of their use with regard to the requirements of regulation 13.5.2 of MARPOL Annex II, based on information supplied by the manufacturer. It is not the intention of the evaluation to determine their efficacy.

Only submissions for cleaning additives intended for the cleaning of cargo residues or preparation of tanks on ships certified to carry noxious liquid substances under Annex II of MARPOL will be considered by the ESPH Technical Group. Submissions for products with other usages (for example, cement remover or additives intended for MARPOL Annex I products) will be rejected.

Furthermore, cleaning agents or other products (i.e. washing media other than water, such as mineral oil or chlorinated solvent) referred to in regulation 13.5.1 of MARPOL Annex II are not considered cleaning additives and fall outside the scope of this guidance. Submissions referring to products not considered cleaning additives will be rejected.

Cleaning additives found to comply with the requirements of regulation 13.5.2 of MARPOL Annex II will be included in annex 10 of the MEPC.2/Circular. This inclusion or listing indicates that an evaluation by the ESPH Technical Group has been completed.

Commercially branded cleaning additives will be listed including the manufacturer and with an expiry date of seven years. Pure products will be listed separately in annex 10 without manufacturer for use by all manufacturers without an expiry date.

Should the formulation of a commercially branded cleaning additive change after the evaluation and listing, it is the responsibility of the manufacturer to inform the Administration and submit updated forms for re-evaluation and listing.

The use of cleaning additives is to be recorded in the Cargo Record Book as stated in appendix 2 to MARPOL Annex II, "List of items to be recorded".

This document contains a guidance note and a form to facilitate the submission of data by manufacturers through their Administrations for evaluation by the ESPH Technical Group. Each submission should consist of the reporting form, the usage instruction sheet and a safety data sheet for the cleaning additive.

Guidance note

The composition of the cleaning additive should be fully specified, so that it can be evaluated on the basis of its individual component(s). All components should have an assessed GESAMP Hazard Profile (GHP) and be listed in the GESAMP Composite list. The pollution category of each component should be extracted from the corresponding entry in chapter 17 or chapter 18 of the IBC Code, the MEPC.2/Circular or assessed according to criteria of paragraph 21.4.3 of the IBC Code based on the GHP.



The manufacturer should provide the data for columns A1, A2 and B1 as well as available information on column D3 of the GHP, for all individual components of the cleaning additive.

Components of the mixture having a D3 rating that is carcinogenic, mutagenic, reprotoxic or sensitizing should be avoided, but if used, should be below the concentration limits specified in Table 18 in GESAMP Reports & Studies No. 102.

Components with Pollution Category X shall not exceed 10% of the total concentration of the cleaning additive.

If a component falls within Pollution Category X, it shall be readily biodegradable (column A2=R). Components considered as falling within the scope of MARPOL Annex I1 should be avoided. If used, for the purposes of this circular, they will be treated as Pollution Category X components.

The component names used on the form shall be the correct technical names as used by GESAMP/EHS, which means that trade names are not acceptable.

If the components of a cleaning additive do not have the required GHP, the manufacturer should submit these components to the GESAMP/EHS on an "owner pays principle". GESAMP/EHS informs the manufacturer of the results of the evaluation of the components.

A submission to the ESPH Technical Group should consist of:

- 1. The reporting form (set out in the appendix) containing the full composition of the cleaning additive, listing all components with their associated GHPs, including the CAS numbers if available;
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- 2. Usage instructions for NLS cargo tank cleaning;
- 3. The safety data sheet for the cleaning additive. The components listed in the safety data sheet should match those listed on the reporting form.

Manufacturers preparing submissions should:

- 1. download the latest reporting form in word format from the IMO website;
- 2. refer to the latest GESAMP/EHS report (PPR.1/Circular) to obtain the latest GESAMP Hazard Profile (GHP) needed for each component to complete the reporting form;
- 3. complete the reporting form in electronic format (handwritten submissions will not be accepted);
- 4. prepare a usage instruction document including information such as which Annex II product(s) the cleaning additive is to be used for and describe how the product is intended to be used for tank cleaning on a chemical tanker
- 5. submit to its Administration in electronic format the elements set out in paragraph 19 (contact details can be found in the latest version of the MEPC.2/Circular);
- 6. follow up as needed until the cleaning additive is accepted or rejected.

The Administration should:

- 1. Review the submission for quality and completeness against this guidance;
- 2. Submit the completed reporting form together with usage instructions, safety data sheet and any additional information to the ESPH Technical Group;
- 3. Inform the manufacturer of the outcome of the evaluation by the ESPH Technical Group.

If accepted, the cleaning additive can be used once it has been listed in annex 10 of the MEPC.2/Circular.

It is the responsibility of the manufacturer to note the expiry date of the cleaning additive listed in annex 10 of the MEPC.2/Circular.



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APPENDIX

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

Confidential data

Proprietary data and composition will be treated as confidential by the Administrations and their representatives who form the evaluating group within IMO.

Name of prod	ucing company:							
•	cleaning additive:							
As they are to	appear in annex 10	of the MEPC.	2/Circular.					
	ing additive been su etails of any changes		re? \(\) Yes	\bigcirc N	No			
Component EHS No.	Component name (as used by GESAMP/EHS)	CAS No.	Concentration %	GESAMP Hazard Profile				Pollution
				A1	A2	B1	D3	Category
Total:								
Total.								
(As stated by	f dilution in wash wa the manufacturer in GE INSTRUCTIONS FC	the description	on of use). TANK CLEANING	AND				
(If this inform	ation is not provided	l, this applicat	tion will be rejecte	ed).				
Date: Signature: Title:								
		End c	of document					

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