

## **Additional guidance from the Department for Environment, Food and Rural Affairs, and from the Welsh Assembly Government**

### **PG6/46(04): Spillage Trays and Bunds at Dry Cleaning Installations**

Defra has received queries regarding whether spillage trays and bunds are required to be retrofitted to dry cleaning machines installed at existing installations or new installations.

This note also corrects three errors in the recently published PG6/46(04), for which we apologise.

#### **Background**

Condition (19) of the Outline Permit in Appendix 3 of PG6/46(04) states that all machines shall have a spillage tray that is 110% of the volume of the largest single tank within the machine. Most new or refurbished machines less than 10 years old will be likely to be already fitted with a spillage tray or bund. Some operators, however, are still using older machines or have installed recently refurbished machines without the equipment.

#### **Revised Guidance**

Spill trays have environmental benefits, but the main reason for fitting them is health and safety. Older machines are unlikely to meet the solvent usage requirements of the SED and the Guidance Note, and the fitting of a spill tray will not rectify that position. If they are not compliant with SED they must not continue to be operated beyond 31 October 2007, so the spill tray issue is irrelevant. For those older machines, which under normal use meet the solvent usage requirements, we consider it unlikely that the cost of retrofitting spill trays can be justified solely on environmental grounds.

(Note. You should note that nearly 10 years ago both HSE and the trade association considered a spill tray was required for health/safety reasons<sup>1</sup>. Guidance to local authorities under the PPC Regulations cannot, however, require techniques whose primary purpose is to safeguard health and safety. For the older machines capable of meeting the solvent usage requirements, this health and safety requirement still remains but the fitting of a spill tray to such machines must be viewed for H&S purposes in the light of the need for it to take place only "as far as is reasonably practicable". Operators should, however, look for opportunities to upgrade second-hand machines when they are re-located, and whatever the circumstances, will have to deal with leaks that are risking or causing a breach of the 20g/kg limit in condition (1). )

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<sup>1</sup> Envirowise Guide GG087, Solvent Consumption in Dry-Cleaning, July 1997 Section 4.1. available on the Envirowise web site <http://www.envirowise.gov.uk/page.aspx?o=117908>

To reflect the above, conditions (11) and (19) are amended as follows:

- at the end of condition (19) insert “[*this condition applies to new and most refurbished machines only – see AQ10(06)<sup>2</sup>*”
- where no spillage trays are fitted, the second bullet in condition (11) should be replaced with

“– away from any drains which may become contaminated as a result of spillage;  
and”

### Errors in PG6/46(04)

Appendix 4, Page 35, second table:

row 1, column 2: this heading should read "corrected solvent input / Compliance Factor 20g/Kg"

row 2 column 2: this should be divided by 20, rather than multiplied by 80. It should therefore read “[J+(10,000\*)] / 20”

The reason for these changes is that, for PER, to convert the solvent inventory (in litres) into allowable mass used per Kg of clothes, the figure must be multiplied by 80. This factor includes a conversion for specific gravity (x1600) and the ELV component (/20) [1600 x 1/20] = x80]. For siloxane machines, it is already intended for the solvent inventory mass to be collected in kilograms. Therefore to convert to allowable mass of clothes the mass is simply divided by 20 (20g/Kg).

Appendix 4, Calculation of Spot Cleaning Correction Factor, first line: there is a zero missing in the formula under the table. It should read “Installations using PER machines only solvent borne spot cleaning correction factor = (S<sub>total</sub>) grams x 0.000625”

### Queries

If you have any queries about this note, please contact Defra or WAG:

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Defra/AEQ  
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<sup>2</sup> This does not remove the need to comply with Health & Safety recommendations relating to the fitting of spill trays.