

PPC Permit ref: 177 Variation ref: 001

Coventry City Council The Environmental Permitting (England and Wales) Regulations 2010

Variation Notice

Avon West Dry Cleaners 54/55 Far Gosford Street Coventry CV1 5DZ

Coventry City Council ("the Council"), in the exercise of the powers conferred upon it by regulation 17 of the Environmental Permitting (England and Wales) Regulations 2010 ("the 2010 Regulations") hereby gives you a notice as follows-

The Council has decided to vary the conditions of permit reference 177 granted under regulation 17(1) of the 2010 Regulations in respect of the operation of the installation at:

Avon West Dry Cleaners 54/55 Far Gosford Street Coventry CV1 5DZ

The variation of the conditions of the permit and date on which they are to take effect are specified in Schedule 1 of this notice. A consolidated permit as varied by this notice is set out in Schedule 2.

Signed on behalf of Coventry City Cou	uncil
Environmental Protection Officer An authorised officer of the Council	Date

PPC Permit ref: **177** Variation ref: **001**

Schedule 1

Variation to the Conditions of the Permit	Date(s) on which the variations are to take place
In Documents A, B & C and supplementary guidance of Permit 177	Immediately
DELETE all references to:	
The Pollution Prevention and Control (England and Wales) Regulations 2000 SI 1973 as amended	
and REPLACE with:	
The Environmental Permitting (England and Wales) Regulations 2010	

Information to be sent to the Council		Frequency at which information should be sent.
(i)	The monthly inventory sheets for the previous quarter OR	Once a quarter
(ii)	With the written agreement of the Council	Once a year
	ords of regular ance during the previous	Once a year
12 mont 3.	hs, referred to in condition	
trained,	of staff nominated and in accordance with ns (5) and (6)	Once a year

Signed on behalf of Coventry City Counc	cil
Environmental Protection Officer	Date
An authorised officer of the Council	

Guidance for Operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice). Further guidance can be found in the general guidance manual at: http://www.defra.gov.uk/environment/ppc/localauth/pubs/guidance/manuals.htm

Dealing with Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedule attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit' which takes into account these and / or previous variations. In cases where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

Offences

Failure to comply with a variation notice is an offence under regulation 38 (1) (b) of the 2010 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £20,000 or imprisonment for a term not exceeding 6 months or both; or (ii) to an unlimited fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in Magistrates Court or Crown Court.

Appeals

Under regulation 31 and Schedule 6 of the 2010 Regulations operators have the right to appeal against a variation notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State given under regulations 61 or 62 or a direction or when determining an appeal.

Appeals against a variation notice do not have the effect of suspending operation of the notice. Appeals do not have the affect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a variation notice must be given within **two months** of the date of the notice, which is the subject matter or the appeal. The secretary of State may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or changes for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide (see paragraphs 2(1) and (2) of Schedule 6 of the 2010 Regulations):

- Written notice of the appeal
- A statement of the grounds of appeal;
- A statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or a hearing —a hearing must be held if either the appellant or

enforcing authority requests this, or if the Planning Inspector or the Secretary of State decides to hold one:

- (Appellants must copy the above three items to the local authority when the appeal is made)
- A copy of any relevant application;
- A copy of any relevant permit;
- A copy of any relevant correspondence between the appellant and the regulator; and
- A copy of any decision or notice, which is the subject matter of the appeal.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for commercial confidentiality under regulation 48 of the 2010 Regulations, and provide relevant details. Unless such information is provided all documents submitted will be open to inspection.

Further guidance on commercial confidentiality can be found in chapter 8 of the LA-IPPC and LAPPC manual.

Where to send your appeal documents

Appeals should be despatched on the day they are dated, and addressed to:

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 –Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

On receipt of an appeal and during the appeal process the main parties will be informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time – the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

Guidance from the Planning Inspectorate states that operator and regulator would be normally expected to pay their own expenses during an appeal. Where a hearing or enquiry is held as part of the appeal process, by virtue of paragraph 5 (6) of Schedule 6 of the 2010 Regulations, either the appellant or the local authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claimed them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Commercial Confidentiality

An operator may request certain information to remain confidential i.e. not be placed on the public register. The operator must request the exclusion from the public register of commercially confidential information at the time of supply of the information requested by this notice or any

other notice. The operator should provide clear justification for each item wishing to be kept from the register. The amount of information excluded from the register should be kept to the minimum necessary to safeguard the operator's commercial advantage. It may assist the local authority if the information the operator considers to be commercially confidential is submitted in a way which will allow it to be easily removed should the claim be granted, for example on separate pages, marked 'claimed confidential'. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to the say that the process is a trade secret.

The general principle is that information should be freely available to the public. Information that maybe considered commercially confidential is that which if it "were being contained within the register would prejudice to an unreasonable degree the commercial interests of an individual or any other person2 (regulation 31(12) of the 2010 Regulations).

Further guidance on commercial confidentiality can be found in Chapter 8 of the LA-IPPC and LAPPC manual.

National Security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State has decided the matter.



POLLUTION PREVENTION & CONTROL ACT 1999

ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2010 (as amended) ("the PPC Regulations")

DOCUMENT A: PERMIT FOR PART B INSTALLATION

Avon West Dry Cleaner

Reference Number: PPC/177

Coventry City Council ("the Council) in accordance with section **7 Part B** of the Environmental Permitting (England and Wales) Regulations 2010 ("The Regulations"), herby permits:

Mr Gurdial Singh Gill

Whose Registered office is:

Avon West Dry Cleaners 54/55 Far Gosford Street Coventry CV1 5DZ

is hereby permitted to carry on a 'Part B' activity listed under the heading 'Part B' of Part 1 of Schedule 1 to the PPC Regulations, namely

Dry Cleaning at:

Avon West Dry Cleaners 54/55 Far Gosford Street Coventry CV1 5DZ

As described below, subject to compliance with the following conditions specified in this document consisting of **13** pages and comprising documents A, B and C, Appendix 1, Appendix 2, Appendix 3, Appendix 4, Plan PPC/177/A, Plan PPC/177/B.

Signed
Alan Bennett, Head of Environmental Health
A person authorised to sign on behalf of the Council
Dated

Scope

Technical Guidance documents used in the preparation of this document:

• Secretary of State's Guidance Note 6/46(04) – Guidance for Dry Cleaning

Date Annual Fee Required: 1st April of each financial year

Date for full compliance: Date permit issued

Permit prepared by: Bill Faulks

Legislation

1. Pollution Prevention and Control Act 1999

2. Environmental Permitting (England and Wales) Regulations 2010

Process Description

Dry cleaning, meaning an industrial or commercial activity using volatile organic compounds to clean garments, furnishings and similar consumer goods excluding the manual removal of stains and spots in the textile and clothing industry.

The dry cleaning installation permitted by this Permit contains the following dry cleaning machines.

Make	Model	Serial Number	Load Capacity	Date of Installation	Dry Cleaning Solvent Used
FTR Bimatic	915L	110 M8 0017	15 kg	1998	Perchloroethylene

DOCUMENT B

Permit Conditions

1.0 Solvent Emission limits

- 1.1 Operations must be carried out in such a manner that no more than **20 grams** of solvent per kilogram of product cleaned and dried shall be emitted as measured and reported annually. The 20 grams includes all organic solvents used within the installation e.g. dry cleaning solvent, waterproofing solutions and spot cleaning solutions.
- 1.2 A weekly inventory of solvent usage, product cleaned and solvent waste sent for recovery or disposal shall be maintained and held on site for inspection by the regulator for at least 12 months.

Note: The solvent management balance sheet for dry cleaning installations in Appendix 2 can be used to demonstrate compliance with this Condition and Condition 1.1 above.

2.0 Operation of Dry Cleaning Machines

- 2.1 The operator shall implement the schedule of procedures, checks and maintenance requirements to each dry cleaning machine as listed in Appendix 3.
- 2.2 The operator shall maintain records incorporating details of all maintenance, testing, repair work carried out on each dry cleaning machine and the scales used to weigh the loads, along with details of training required under Condition 3.1. The records shall be available within 7 days upon request by the regulator.
- 2.3 The regulator shall be advised in writing 14 days prior to any proposed significant alteration to the operation, or modification of the installation which may have an effect on emissions of VOC from the installation, in particular changes to the matters listed in Condition 2.1.
- 2.4 Dry cleaning machines shall be installed and operated in accordance with supplier recommendations, so as to minimise the release VOC to air, land and water.
- 2.5 Dry cleaning machines shall be operated as full as the type of materials to be cleaned will allow. (e.g. Full loads for light non delicates materials such as suits. Delicates and heavy materials, such as, wedding dresses and blankets may need to be cleaned in part loads).
- 2.6 The dry cleaning machine-loading door shall be kept closed when not in use.
- 2.7 The dry cleaning machine loading door shall be closed before the start-up of the machine, and kept closed at all times through the drying and cleaning cycle.
- 2.8 The still, button trap and lint filter doors shall be closed before the start-up of the machine and kept closed at all times through the drying and cleaning cycle.

3.0 Staff Training and Instruction

- 3.1 All operating staff must know where the operating manual for each dry cleaning machine can be found and have ready access to it.
- 3.2 All operating staff must have been trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents. The training received must be recorded.

4.0 Specification for Dry Cleaning Machines

- 4.1 All dry cleaning machines shall have interlocks to prevent start-up of the machine until the loading door is closed and to prevent opening of the loading door until the machine cycle has finished and the cage has stopped rotating.
- 4.2 All dry cleaning machines shall have interlocks to automatically shut down the machine under any of the following conditions: cooling water shortage, failure of the cooling ability of the still condenser, failure of the cooling ability of the refrigeration system, or failure in the machine heating system resulting in the inability to dry the load.
- 4.3 All dry cleaning machines shall have interlocks to automatically shut down the machine if the still; button trap and lint filter doors are not properly closed.
- 4.4 All dry cleaning machines using PER shall have a secondary water separator followed by an activated carbon adsorption bed to minimise potential solvent losses.
- 4.5 The still shall have a thermostatic control device or equivalent with which to set a maximum temperature, in accordance with manufacturers' recommendations for the solvent used.
- 4.6 The heat source shall automatically switch off at the end of the distillation process.
- 4.7 Every dry cleaning machine shall have a spillage tray with a volume greater than 110% of the volume of the largest single tank within the machine.

5.0 Abnormal Emissions, Malfunction or Breakdown

- 5.1 In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator must:
 - investigate immediately and undertake corrective action;
 - adjust the process or activity to minimise those emissions; and
 - promptly record the events and actions taken.

In this condition abnormal emission will include any detectable solvent smell other than in the area of the dry cleaning machine.

- 5.2 In cases of non-compliance causing immediate danger to human health, operation of the activity must be suspended; and the regulator informed within 24 hours.
- 5.3 Spares and consumables in particular, those subject to continual wear shall be held on site, or should be available at short notice from guaranteed suppliers, so that plant breakdowns can be rectified rapidly.

6.0 Storage and Use of Solvents

- 6.1 Where cleaning solvents containing VOC are not received in bulk they shall be stored
 - in the containers they were supplied in, with the lid securely fastened al all times other than when in use; and
 - within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container; and
 - away from sources of heat and bright light; and
 - with access restricted to only appropriately trained staff.

Note: from a health and safety point of view, a well ventilated area should be used.

- 6.2 Where cleaning solvents containing VOC are not received in bulk, the lids of the containers shall only be removed when the container is next to the cleaning machine readily for filling. Cleaning solvents shall be obtained in containers of a size which allows the entire container to be emptied into the machine at each topping up. Once emptied the lid of the container shall be replaced securely.
- 6.3 Prior to disposal, containers contaminated with solvent shall be stored with the lids securely fastened to minimise emissions from residues during storage prior to disposal, and labelled so that all that handle them are aware of their contents.
- 6.4 Solvent contaminated waste, for example still residues, shall be stored:
 - in suitable sealed containers with the lid securely fastened at all times other than when in use; and
 - on a suitable impervious floor; and
 - away from any drains which may become contaminated with residues as a result of spillage,
 - away from sources of heat and bright light; and
 - with access restricted to only appropriately trained staff.

Note: from a health and safety point of view, a well ventilated area should be used.

- 6.5 Equipment to clean up spillages must be quickly accessible in all solvent handling and storage areas.
- 6.6 Spot cleaning with organic solvents or organic solvent borne preparations shall not be carried unless they are the only method of treating a particular stain on the material to be cleaned.

7.0 Continuous PER Monitoring

- 7.1 Where PER is used within the installation, a suitable continuous monitoring device for PER shall be installed within the operating area of the dry cleaning machine to monitor for leaks and any other malfunctions which may lead to the release of PER.
- 7.2 The continuous PER monitoring device required by Condition 7.1 shall be maintained and calibrated in accordance with the manufacturers recommendations.

8.0 Information to be Forwarded

Information to be sent to the Council	Frequency at which information should be sent.
(i) The monthly inventory	Once a quarter
sheets for the previous quarter	
OR	
(ii) With the written agreement of the Council	Once a year
The records of regular maintenance	Once a year.
during the previous 12 months, referred	
to in condition 3.	
A list of staff nominated and trained, in	Once a year
accordance with conditions (5) and (6)	

DOCUMENT C

Supplementary Notes

These notes do not comprise part of the Permit but contain guidance relevant to the Permit.

This Permit is issued under Regulation 10 of the PPC Regulations to operate an installation carrying out one or more of the activities listed in Part B to Schedule 1 of those Regulations, to the extent authorised by the Permit.

Previous Permit or Authorisation superseded by this Permit			
Holder Reference Number Date of Issue			
None Not Applicable Not Applicable		Not Applicable	

Variations from previous Permit or Authorisation		
Condition Variation Made		
None	Not Applicable	

Upgrading requirements within this permit			
Relevant Condition Provision Compliance Date			
None	Not Applicable	Not Applicable	

The Permit includes conditions that have to be complied with. It should be noted that aspects of the operation of the installation which are not regulated by those conditions are subject to the general condition implied by Regulation 12(10) of the PPC Regulations, that the Operator shall use the best available techniques (BAT) for preventing or, where that is not practical, reducing emissions from the installation.

No significant pollution shall be caused.

Note that BAT includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

The regulator

In the context of this permit, the "regulator" is Coventry City Council. All necessary contact should be made with the Environmental Protection section.

In the case of a serious release requiring notification to the regulator, telephone contact can be made on **0500 834333** both inside and outside office hours.

Definitions – in the context of this permit:

An 'activity' is an industrial activity forming part of an 'installation'. Different types of activities are listed within Schedule 1 of the PPC Regulations. They are broadly broken down into industrial sectors, grouping similar activities into chapters within this schedule. Other 'associated' activities (not described in Schedule 1) may also form part of an installation.

An 'installation' comprises not just any relevant unit carrying out Part A2 or Part B activities listed in Schedule 1 to the PPC Regulations, but also directly associated activities which have a technical connection with the Schedule 1 activities and which could have an effect on pollution. Once the extent of an installation has been established, each activity (if listed in Schedule 1 or constituting an 'associated activity' with an effect on pollution) shall be included in the permit.

'PER' is perchloroethylene

Health, safety and other statutory requirements

This permit is given in relation to the requirements of the PPC Regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

This permit does not detract from any other statutory requirement such as any need to obtain planning permission, hazardous substances consent, discharge consent from the Environment Agency, building regulations approval or a Waste Disposal License.

Disposal of waste should be carried out in a safe and proper manner at a waste disposal facility, the operator of which holds a license to dispose of this type of waste.

Confidentiality

Where this Permit requires the Operator to provide information to the regulator, the regulator will place the information onto the public registers in accordance with the requirements of the PPC Regulations. If the Operator considers that any information provided is commercially

confidential, it may apply to the regulator to have such information withheld from the register as provided in the PPC Regulations. To enable the regulator to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

Changes to the installation

If at any time the installation, or any aspect of the installation regulated by this Permit changes such that the Permit no longer reflects the installation and requires alteration, the regulator must be notified. Advice on notification of changes to the installation, which may either be relevant or substantial, can be found in paragraphs 39-43 of General Guidance Note 3.

Operators will be liable to enforcement action if they make a change without approval, which is such that either the installation (as changed) is no longer the installation that is authorised in the Permit or a condition of the Permit is not being complied with as a result of the change being made.

A 'substantial change' means, in relation to an installation, a change in operation, which in the opinion of the local authority may have significant negative effects on human beings or the environment.

Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) the regulator should be informed in writing. Such notification must include the information specified in regulation 20(3) of the PPC Regulations.

Transfer of the permit or part of the permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 18 of the PPC Regulations. A transfer will be allowed unless the regulator considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

Appeal against permit conditions

Anyone who is aggrieved by the conditions included in a Permit can appeal to the Secretary of State for the Environment, Food and Rural Affairs. Appeals must be made in accordance with the requirements of Regulation 27 and Schedule 8 of the PPC Regulations.

Appeals should be received by the Secretary of State for Environment, Food and Rural Affairs. The address is as follows:

The Planning Inspectorate
Environmental Appeals Administration
Temple Quay House
2 The Square
Temple,Quay
BRISTOL
BS1 6PN

An appeal bought under paragraph (1) (c) or (d) in relation to the conditions in a permit will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

HMSO Publications

All HMSO publications can be ordered by telephone on Tel: 0870 600 5522

Fax: 0870 600 5533 or e-mail: book.orders@tso.co.uk

APPENDIX 1

Annual Inventory Sheet: installations using all other solvents and mixed solvents

Name of the premises
Permit ref number
Date

Week Number (1-52)	Weight of products Cleaned for week (kg) (A)	Total solvent input for week (I1week) (grams) (J)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12 13		
14 15		
16		
17		
18 19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
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30		
31		
32		
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34		
35		
36		
37		
38		
39 40		
40		
42		
43		
44		
45		
46		
47		
48		
49		
50		
51	-	
52		
Totals	A total in kg	G total in litres

A total in kg

Spot Cleaning Correction Factor

Spot Cleaning 10 litres or less

Where 10 litres or less per annum are used of:

- Proprietary solvent borne purchased spot cleaning solutions, and/or
- Solvent borne spot cleaning solutions made up from solvent other than the main dry cleaning fluid (PER, HCS or Siloxane)

The spot cleaning correction factor is 10,000 (grams) and is already entered into the table below.

Spot Cleaning more than 10 litres

*Where more than 10 litres per annum are used of:

- Proprietary solvent borne purchased spot cleaning solutions, and/or
- Solvent borne spot cleaning solutions made up from solvent other than the main dry cleaning fluid (PER, HCS or Siloxane)

Then the method at the end of the Appendix should be used to calculate the correction factor to replace 10,000 in the table below.

Total corrected solvent Input for year including solvent borne spot cleaners (I1) (grams)	Corrected solvent Input X Compliance Factor 20g/kg	Weight of product cleaned for compliance (M) (kg)	Actual weight of product cleaned and dried (A total) (kg)
J+10,000*	[J+(10,000*)] X 80	=M kg	A kg

For PER Compliance the weight of products cleaned and dried in kgs should be at least: M kg

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G total in litres

APPENDIX 2

Date

Annual Inventory Sheet: installations using PER machines only

7

Week Number (1-52)	Weight of products Cleaned for week (kg) (A)	Total solvent input for week (I1week) (grams) (J)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
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15		
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38		
39		
40		
41		
42		
43		
44		
45		
46		
47		
48		
49		
50		
51		
52		
Totals	A total in kg	G total in litres

APPENDIX 3

Solvent and Product Cleaned Inventory

Weekly Inventory Sheet: installations using PER machines only

Name of the premises						
Permit ref numl	ber					
Start date of we	ek					
Week Number ((1-52)					
Serial Number of machines	Weight of products cleaned (kg)		Initial stock of solvent in machine at start date (litres)	Solvent added to machine over week (litres)		Final stock of solvent in machine at end of week (litres)
						,
Totals	kg(A)	litres(B)		litres(C)	litres(D)
Still residues raked out (litres) and sent for recovery or disposal during week			cill residues pumped of tres) and sent for covery or disposal uring week	out		
Litres X 0.15			Litres >			
	litres(E)		litre	es(F)		

Solvent Input(I1)

Solvent input for week (I1)	=	Initial solvent stock at start of accounting period (B)	+	Solvent purchased during the accounting period (C)	-	Final solvent stock at the end of the accounting period (D)	-	Solvent in waste sent for recovery, or disposal (E+F)
(I1 week)	=	В	+	С	-	D	-	(E+F)

APPENDIX 4

Annual Inventory Sheet: installations using PER machines only Name of the premises Permit Reference Number

Date

Week Number (1-52)	Weight of products cleaned for week (kg) (A)	Solvent Input for week (I _{1week}) litres
1		
2		
3 etc		
52		
Totals	= A total kg	= Litres (G)

Spot Cleaning 10 litres or LESS

Where 10 litres or less per annum are used of:

- proprietary solvent borne purchased spot cleaning solutions, and/or
- solvent borne spot cleaning solutions made up from solvent other than the main dry cleaning fluid (PER).

The spot cleaning correction factor is 6.25 (litres) and is already entered into the table below.

* Spot Cleaning MORE than 10 litres

Where more than 10 litres per annum are used of:

- proprietary solvent borne purchased spot cleaning solutions, and/or
- solvent borne spot cleaning solutions made up from solvent other than the main dry cleaning fluid (PER).

Then the method at the end of the Appendix should be used to calculate the correction factor to replace 6.25 in the table below.

Corrected solvent Input for year including solvent borne spot cleaners (I ₁) (litres)	Corrected solvent Input X Compliance Factor for PER 80kg/litre	Weight of product cleaned for compliance (J) (kg)	Actual weight of product cleaned and dried (A total) (kg)
6.25* + G litres	(6.25* + G) x 80	= J kg	A _{total} kg

For PER Compliance the weight of products cleaned and dried in kgs should be at least: **J kg**