

PPC Permit ref: 173 Variation ref: 001

# Coventry City Council Environmental Permitting (England and Wales) Regulations 2007

# Regulation 17

#### Notice of Variation

To Mebro Dry Cleaners 211 Walsgrave Road Coventry CV2 4HH

Coventry City Council ("the Council"), in the exercise of the powers conferred upon it by regulation 17 of the Environmental Permitting Regulations 2007 ("the 2007 Regulations") hereby gives you a notice as follows-

The Council has decided to vary the conditions of permit reference PPC/067granted under regulation 9(1) of the 2007 Regulations in respect of the operation of the installation at

Mebro Dry Cleaners 211 Walsgrave Road Coventry CV2 4HH

The variation of the conditions of the permi	t are specified in Schedule 1 to this notice
Signed on behalf of Coventry City Council	
Principal Environmental Health Officer An authorised officer of the Council	Date

PPC Permit ref: PPC/173

Variation ref: 001

# **SCHEDULE 1**

All conditions contained within Permit reference number PPC/173 issued on 7<sup>th</sup> June 2007 shall be deleted. All amendments to Permit reference number PPC/173 listed in all previous variation notices shall be deleted. Permit Reference number PPC/173 shall be varied to read as follows:

#### **POLLUTION PREVENTION & CONTROL ACT 1999**

**DOCUMENT A: PERMIT** 

# **Mebro Dry Cleaners**

Reference Number PPC/173

Coventry City Council ("the Council") in accordance with Section 10(2) of the Pollution Prevention & Control (England and Wales) Regulations 2007 ("The Regulations"), hereby permits:

# **Mebro Dry Cleaners**

Whose registered office is:

Mebro Dry Cleaners 211 Walsgrave Road Coventry CV2 4HH

To operate a Part B installation involving a dry cleaning activity as prescribed in Section 7 Part B of Schedule 1 to The Regulations, at:

Mebro Dry Cleaners 211 Walsgrave Road Coventry CV2 4HH

The permit is subject to the conditions specified in this document consisting of 17 pages and comprising documents A, B and C, plans PPC/173/A and PPC/173/B,

# **SCOPE**

The installation comprises not just any relevant unit carrying out a Part B activity listed in Schedule 1 to the Regulations, but also directly associated activities which have a technical connection with that activity and which could have an effect on pollution.

All pollutant concentrations shall be expressed at reference conditions of 273K and 101.3kPa, without correction for water vapour content.

Technical Guidance documents used in the preparation of this document:

Secretary of States Guidance Note PG 6/46(04) – Dry Cleaning

• Secretary of State's Guidance – Local Authorities General Guidance Manual.

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

Date for Full Compliance: Date permit issued

Permit Prepared By: Angela Hands
Permit Checked By: Rachel Field

# **LEGISLATION**

1. Pollution Prevention and Control Act 1999.

2. Environmental Permitting (England and Wales) Regulations 2007

# BRIEF DESCRIPTION OF THE INSTALLATION REGULATED BY THIS PERMIT

Definitions referred to in this permit

- An Activity is an industrial activity forming part of an installation. Different types
  of activity are listed within Schedule 1 of the PPC Regulations and are broadly
  broken down into industrial sectors. Other "associated" activities may also form
  part of an installation.
- An Installation comprises not just any relevant unit carrying out a B activity listed within Schedule 1 to the PPC Regulations, but also directly associated activities which have a technical connection with a schedule 1 activity and which could have an effect on pollution.
- An Operator is the person (e.g. a company or individual) who has control over the operation of an installation.
- Volatile organic compound (VOC) shall mean any organic compound having at 293K a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.
- Organic solvent shall mean any VOC which is used alone or in combination with other agents, and without undergoing a chemical change, to dissolve raw materials, products or waste materials, or is used as a cleaning agent to dissolve contaminants, or as a dissolver, or as a dispersion medium, or as a viscosity adjuster, or as a surface tension adjuster, or a plasticiser, or as a preservative.
- Stack includes structures and openings of any kind from or through which substances may be emitted to air.
- Duct includes enclosed structures through which gaseous substances may be conveyed.
- Process vent includes open terminations of ducts.
- Authorised Officer shall mean an officer authorised to carry out duties under the Pollution Prevention and Control Act 1999 and subordinate regulations
- Logbook shall mean any electronic or paper means of storage of the required information as agreed by the regulator
- Local Authority shall mean Coventry City Council
- "m" means metre
- "m/s" means metres per second

# **Description of Permitted activity**

This is a Solvent Emissions Directive (SED) dry cleaning activity as defined in Schedule 1, Section 7 Part B, of the Environmental Permitting (England and Wales) Regulations 2007.

The process involves the operation of an 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
Renzacci	Progress 20 Club	21762-09	10 kg	June 2009	Perchloroethylene

#### **DOCUMENT B**

#### **PERMIT CONDITIONS**

All conditions shall have immediate effect unless stated otherwise

#### **SOLVENT EMISSION LIMITS**

- 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.
- 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 above.

#### **OPERATION OF DRY CLEANING MACHINES**

- 3. The operator shall implement the schedule of procedures, checks and maintenance requirements to each dry cleaning machine as listed in Appendix 3.
- 4. 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 11. The records shall be available within 7 days upon request by the regulator.
- 5. 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 3.
- 6. 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.
- 7. 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).
- 8. The dry cleaning machine-loading door shall be kept closed when not in use.
- 9. 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.
- 10. 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.

# STAFF TRAINING AND INSTRUCTION

- 11. All operating staff must know where the operating manual for each dry cleaning machine can be found and have ready access to it.
- 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.

# SPECIFICATION FOR DRY CLEANING MACHINES

- 13. 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.
- 14. 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.
- 15. 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.
- 16. All dry cleaning machines using PER shall have a secondary water separator followed by an activated carbon adsorption bed to minimise potential solvent losses.
- 17. 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.
- 18. The heat source shall automatically switch off at the end of the distillation process.
- 19. 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.

# ABNORMAL EMISSIONS, MALFUNCTION OR BREAKDOWN

- 20. 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.

21. In cases of non-compliance causing immediate danger to human health, operation of the activity must be suspended; and the regulator informed immediately.

22. 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.

# **STORAGE AND USE OF SOLVENTS**

- 23. 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: for purpose of health and safety, a well ventilated area should be used.

- 24. 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.
- 25. 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 labeled so that all that handle them are aware of their contents.
- 26. 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.

- 27. Equipment to clean up spillages must be quickly accessible in all solvent handling and storage areas.
- 28. 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.

#### **CONTINUOUS PER MONITORING**

- 29. 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.
- 30. The continuous PER monitoring device required by Condition 29 shall be maintained and calibrated in accordance with the manufacturer's recommendations.

#### **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.

The Permit includes conditions that must 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.

#### <u>Definitions – in the context of this permit:</u>

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 Licence.

Disposal of waste should be carried out in a safe and proper manner at a waste disposal facility, the operator of which holds a licence 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	Weight of	Total solvent
(1-52)	products	input for week
(102)	Cleaned for	(I1week) (grams)
	week	(J)
	(kg) (A)	
11		
2 3		
4		
5		
6		
9		
10		
11		
12 13		
14		
15		
16 17		
18		
19		
20		
21		
21 22 23		
24		
25		
26 27		
28		
29		
30 31		
32		
33		
34		
35 36		
37		
38		
39 40		
41		
42		
43		
44 45		
46		
47		
48		
49 50		
51		
52		
Totals	<b>A</b> total in kg	<b>G</b> total in litres

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)	Acctual weight of product cleaned and dried (Atotal) (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

Append	xik	2
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Appendix 2 Annual Inventory Sheet: installations using PER machines only Weekly Inventory Sheet: installations using PER machines only
Name of the premises

Name of the premis	ses
Permit ref number	

Date																									
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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		
<u>6</u>		
7		
8		
<u>9</u> 10		
11		
12		
13		
14		
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22 23		
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24 25		
26		
27		
28		
29		
30		
31		
32 33		
33		
35		
36		
37		
38		
39		
40		
41		+
42		
43 44	+	+
44 45		
46		
47		
48		
49		
50		
51		
52		
Totals	A total in kg	<b>G</b> total in litres

# Appendix 3

# **Solvent and Product Cleaned Inventory**

Weekly Inventory Sheet: installations using PER machin	nes only
Name of the premises	

Start date of week .....

Permit ref number .....

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	Still residues pumped out (litres) and sent for recovery or disposal during week		
Litres X 0.15	Litres X 0.6		
litres(E)	litres(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	<u> </u>	B	+	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 <sub>1week</sub> ) 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 entred 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 <sub>1</sub> ) (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 <sub>total</sub> kg

For PER Compliance the weight of products cleaned and dried in kgs should be at least:  ${f J}$   ${f kg}$ 

# <u>Plan B</u>

**Layout of Dry Cleaning Premises**