POLLUTION PREVENTION & CONTROL ACT 1999

POLLUTION PREVENTION & CONTROL (ENGLAND AND WALES) REGULATIONS 2000 (as amended) ("the PPC Regulations")

DOCUMENT A: PERMIT FOR PART B INSTALLATION

PHS Treadsmart

Reference Number: PPC/182

Coventry City Council ("the Council) in accordance with Section 10 (2) of the Pollution Prevention & Control (England and Wales) Regulations 2000 ("The Regulations"), herby permits:

PHS Treadsmart

Whose Registered office is:

PHS Group
Western Industrial Estate
Caerphilly
CF83 1XH

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:

PHS Treadsmart
Unit 1 Dutton Road
Aldermans Green Industrial Estate
Coventry
CV2 2LE

As described below, subject to compliance with the following conditions specified in this document consisting of **15** pages and comprising documents A, B and C, Appendices 1-5, and Plans PPC/182/A & Plan PPC/182/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
- Secretary of State's Guidance – General Guidance Manual on Policy and Procedures for A2 and B Installations. ISBN 0-85521-028-1

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

Date for full compliance: Date permit issued

Permit prepared by: Neil Chaplin
Permit Checked by: Daniel Rowlson

Legislation

1. Pollution Prevention and Control Act 1999
2. Pollution Prevention and Control (England and Wales) Regulations 2000

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
Bowe	SI 70	457/9304	70kg	Feb 2008	Perchloroethylene

The general location and installation boundary of the authorised process is shown by the hatched red line on the attached plan PPC 182/A. The internal site layout is shown on the attached plan PPC 182/B.

DOCUMENT B

CONDITIONS

All conditions shall have immediate effect unless otherwise stated

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 3 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 4.

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 that 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 immediately.

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 at all times other than when in use
- Within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container
- Away from sources of heat and bright light
- With access restricted to only appropriately trained staff.

Note: for purpose of health and safety, 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: for purpose of health and safety, 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.

DOCUMENT C

RESIDUAL DUTY

In relation to any aspect of the process not regulated by specific conditions in this permit, then Best Available Techniques shall be used:

For the purposes of the Pollution Prevention and Control (England and Wales) Regulations 2000, "best available techniques" means the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent and, where practicable, generally to reduce emissions and the impact on the environment as a whole; and for the purpose of this definition –

a) "available techniques" means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, in the economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the operator;

b) "best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;

c) "techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Appendix 1

SUPPLEMENTARY NOTES

These notes do not comprise part of the Permit PPC/182 but contain guidance relevant to the Permit.

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

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.

Inspections and Powers of Entry

Regular inspections will be carried out by officers of the Council (the Local Authority Inspectors) to check and ensure full compliance with the Permit conditions and residual duties. These inspections may be carried out without prior notice.

Under section 108(6) of the Environment Act 1995 authorised Local Authority Inspectors have been granted powers of entry into any premises for the purposes of discharging relevant duties.

Reviews

The Local Authority has a statutory duty to review the permit at least once every 6 years or in the following circumstances set out in regulation 15 of the Pollution Prevention and Control regulations 2000:

a) The pollution from the installation is of such significance that the existing emission limit values for the permit need to be revised or new emission limit values need to be included in the permit

b) Substantial changes in BAT make it possible to reduce emissions from he installation or mobile plant significantly without imposing excessive costs; or

c) Operational safety of the activities carried out in the installation or mobile plant requires other techniques to be used

Health and Safety

This Permit is given in relation to the requirements of the Pollution Prevention and Control (England and Wales) Regulations 2000. It must not be taken to replace any workplace responsibilities the operator has under Health & Safety legislation. Whenever emission limits quoted in this Permit conflict with occupational exposure limits set under the Health and Safety at Work Act 1974 to secure the health, safety or welfare of persons at work, the tighter limit should prevail.

Installation must be operated in order to protect persons at work as well as the environment. In achieving conditions in this Permit the operator must not adopt any course of action that would put at risk the health, safety or welfare of persons at work.

Other Statutory Requirements

This Permit does not detract from any other statutory requirement, such as the need to obtain planning permission, hazardous substances consent, discharge consent from the Environment Agency, building regulations approval, or a waste disposal licence.

This Permit does not authorise a contravention of any other enactment or any order made, granted or issued under any enactment, nor does it authorise a contravention of any rule or breach of any agreement.

The Operator is advised to consult the relevant Planning Department regarding changes that may be required as a result of this Permit (e.g. stack heights) as they may require planning permission.

Transfer of Permits

Where the operator of an installation wishes to transfer, in whole or in part, his permit to another person, the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. Such an application shall be accompanied by the permit and any fee prescribed in respect of the transfer.

In the case of partial transfer, where the original operator retains part of the permit, the application must make clear who will retain control over the various parts of the installation. The application must include a plan identifying which parts of the site and which activities the operator proposes transferring.

The local authority will then determine whether to allow the transfer within a two-month period, unless the local authority and the applicants agree a longer period. Where the local authority approves the transfer, the transfer will take effect from the date requested by the operator or a date that may be agreed by the local authority and the applicants.

Variation to Permits

Variation to permits may be initiated either by the local authority or the operator, either in response to changes in the operation of an installation or if new conditions are needed to deal with new matters. Variations may be required in response to the following.

- Change of operation of the installation. (The operator shall notify the local authority under Section 16(1) of the Regulations.)
- In response to the findings of a periodic review of conditions.
- In response to the findings of an inspection.
- New or revised sector guidance notes

The operator should apply to the Local Authority in order to vary a permit under regulation 17 of the Regulations. The application must be in writing and, in accordance with Part 1 of Schedule 7 to the Regulations contain:

- The name, address and telephone number of the operator.
- The address of the installation.
- A correspondence address.
- A description of the proposed changes.
- An indication of the variations the operator would like to make.
- Any other information the operator wants the authority take account of.

Substantial Change

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.

Where the local authority deems that a proposed variation constitutes a substantial change, the operator will be informed of the process to follow.

Noise

This Permit does not include reference to noise. Statutory noise nuisance is regulated separately under the provisions of Part III of the 1990 Act.

Appeals

An Appeal can be made against the conditions in, or variations to this Permit as per Part IV of the Regulations. Appeals are made to the Planning Inspectorate who acts on behalf of the Secretary of State. Appeals against conditions within a Permit must be submitted within 6 months of the date of issue of the permit. Appeals against variation notices must be submitted within 2 months of the date of issue of the notice. Appeals should be despatched on the day they are dated and sent to:

The Planning Inspectorate
Environmental Appeals Administration
Room 4/19 – Eagle Wing
Temple Quay House
2 The Square
Temple Quay
BRISTOL
BS1 6PN

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 2

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		
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52		
Totals	**A** total in kg	**G** 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

Appendix 3

Annual Inventory Sheet: installations using PER machines only

Weekly Inventory Sheet: installations using PER machines only

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		
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3		
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51		
52		
Totals	**A** total in kg	**G** total in litres

Appendix 4

Solvent and Product Cleaned Inventory

Weekly Inventory Sheet: installations using PER machines only

Name of the premises

……

Permit ref number ……..

Start date of week ……..

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)	=	B	+	C	-	D	-	(E+F)

Appendix 5

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 entred into the table below.

*** Spot Cleaning MORE than 10 litres**

Where more than 10 litres per annum are used of:

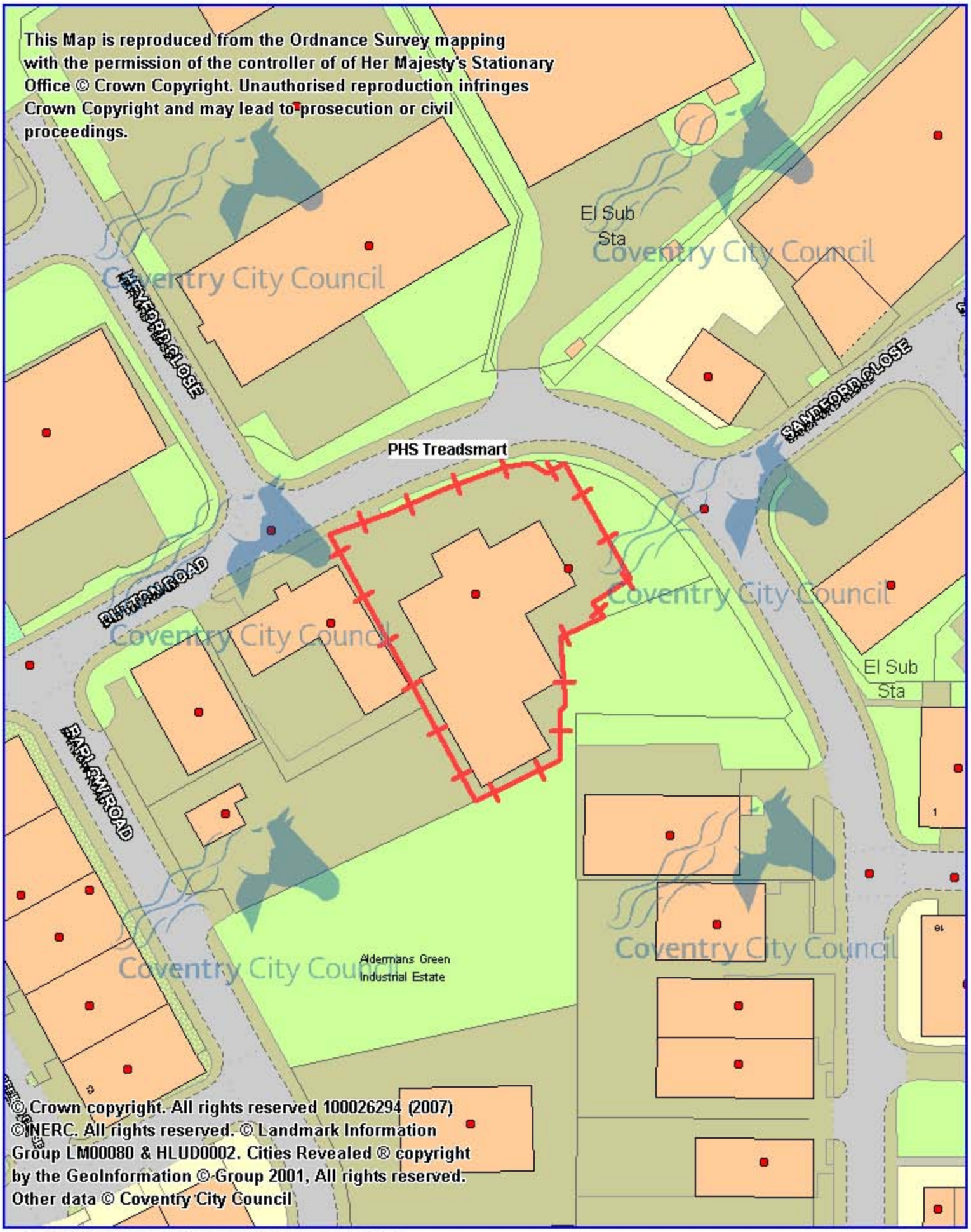
- proprietary solvent borne purchased spot cleaning solutions, and/or
- solvent borne spot cleaning solutions made up from solvent other than the main dry cleaning fluid (PER).

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_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**

PPC 182 Plan A - PHS Treadsmart



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PPC 182 Plan B PHS Treadsmart