

**Pollution Prevention and Control Act 1999
Pollution Prevention and Control (England and Wales)
Regulations 2000 (as amended) Schedule 1**

Permit Reference No. PPC/DC1

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Section One

Introductory Note & Description of Permitted Installation

**Pollution Prevention and Control Act 1999
Pollution Prevention and Control (England and Wales) Regulations 2000
(as amended) Schedule 1**

Permit Reference No. PPC/DC1

Introductory Note

Permit Holder:	FibreCare Dry Cleaners
Installation Address:	333 Seaside Eastbourne East Sussex BN20 8EH
Registered Address of Company:	As Above

Provenance	Date
Permit application	1 st March 2006
Permit issued	1 st April 2006

FibreCare Dry Cleaners is hereby permitted by Eastbourne Borough Council to carry on a Dry Cleaning Process operating the dry cleaning machine:-

Make	Model	Serial No.
Renzacci	Planet 45	19637

As prescribed in Section 7, part of Schedule 1, of The Pollution Prevention and Control (England and Wales) Regulations 2000 SI 1973 (as amended) in accordance with the conditions detailed in Section 2 of this Permit.

Signed..... Date.....

Head of Environmental Health

Process Description

- 1.1 The process operated is the dry cleaning of clothes using organic solvents and in particular Perchloroethyle.
- 1.2 Products to be dry cleaned are received at the installation; ticketed, checked for foreign bodies (coins etc.), loose items (buttons), sorted by colour (lights and darks) and material (woollen blankets, suits etc.). Sorting of the materials and colours enables the optimum loads to be made up which will minimise solvent consumption, as a result of materials within the load needing similar drying times. Certain items should not be dry cleaned in PER machines due to their high solvent retention e.g. duvets.
- 1.3 Before or after sorting of the products for cleaning, stains which may require addition treatment are treated with spot cleaning solutions. Specialist suppliers to the industry supply most of these solutions and the amount of organic solvent is usually very low. The uses of such spot cleaning solutions are kept to a minimum.
- 1.4 Before loading into the machine the load is weighed to optimise the loading of the machine and to ensure that the machine is not over loaded. Overloading and under loading of the machine can increase solvent consumption. The products to be cleaned are taken to the machine and the door of the machine is then opened and the products loaded in. Care is required to ensure that door seal is not damaged in anyway during the loading operation. The door of the machine is then closed and not opened again until the cycle has finished.
- 1.5 The dry cleaning machines have a number of set programmes for different types of cleaning cycles. The appropriate cycle is chosen for type and load of products being cleaned. A digital counter on the machines records the number of cleaning cycles, which have taken place. The use of the counters helps in auditing against compliance provisions.
- 1.6 Once the cleaning and drying cycle is completed the products are removed from the machine. If a solvent odour associated with the products is apparent then this indicates that the solvent recovery process may not have been optimised. This may be due to a number of reasons: poor loading of the machine (over loading or inadequate sorting of materials to be cleaned); use of the wrong programme for the particular load, leading to poor solvent recovery, as a result of insufficient drying time, or a possible fault within the machine.
- 1.7 During the drying cycle of the machine, water which was present in the garments to be cleaned and within the atmosphere of the dry cleaning machine is condensed out within the water separator. This water is likely to contain small quantities of the dry cleaning solvent. Water contaminated with solvent will often appear cloudy.

- 1.8** After a number of cleaning operations the residues which collect in the still of the dry cleaning machine are removed. This is done by distilling to dry the contents of the still. Once cooled the residues are then raked out and disposed of via a licensed waste contractor. On pumpable systems the residue is distilled until the remaining product is just pumpable, the residues are then pumped into a sealed holding container. The residues with any residual solvent are then sent for specialist recovery of the solvent prior to disposal of the solid residues.
- 1.9** The SED requires that dry cleaning installations are operated in such a manner that no more than 20 grams of solvent per kilogram of product cleaned and dried shall be emitted as measured on an annual basis. The 20 grams includes all organic solvents used within the installation e.g. dry cleaning solvent, water-proofing solutions and spot cleaning solutions. The regulator will be required to check compliance with this directive requirement using the return submitted by the operator to demonstrate compliance. Other information may be used by the regulator to audit the returns from the operator for example:
- Turnover of the installation;
 - Customer/ticket counts;
 - Solvent purchased reconciliation

Section Two

Permit Conditions

**Pollution Prevention and Control Act 1999
Pollution Prevention and Control (England and Wales) Regulations 2000
(as amended) Schedule 1**

Permit Reference No. PPC/DC1

The conditions contained within this Permit are based upon Guidance Note PG 6/46 (04), Secretary of State's Guidance "Dry Cleaning"

The requirements of the conditions attached to this permit shall come into effect on the date indicated in the individual condition or if no date is indicated shall take effect forthwith.

1.0 Permit Conditions

- 1.1** Operations must be carried out in such a manner that no more than 20 grams of solvent (Perchloroethylene) 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. A solvent monitoring form approved by Eastbourne Borough Council shall be used for this Purpose
- 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 an officer of Eastbourne Borough Council for at least 12 months
- 1.3** The operator shall implement the schedule of procedures, checks and maintenance requirements to each dry cleaning machine as listed below:-

Common parts on machine which require checks and cleaning include maintenance replacment:
<ul style="list-style-type: none">• door seals: wipe clean all door seals daily and replace annually• button trap (manual): clean sieve twice daily and after lint loads• lint filter (manual): clean twice daily• water separator: drain and clean every two weeks; drain excess water daily• solvent pump: check for leaks after repair or maintenance• filters: drain spent cartridges in the machine overnight; check for leaks after replacement• still: empty at least once per week (depending upon through put of garments)• recovery condensers: clean condenser fins on air cooled refrigeration systems on a monthly basis.
Weekly Checks
<ul style="list-style-type: none">• all drying and still thermostats• level controls in the cage and still• the still pressure relief device• draining line on the drum• for by-passing of the lint filter, which may lead to blocking of the drying circuit• button trap is functioning correctly and debris cannot pass the trap.

- 1.4** Eastbourne Borough Council shall be advised in writing 14 days prior to any proposed significant alteration to the operation, modification of the installation and the replacement or addition of further dry cleaning machines at the installation.
- 1.5** All operating staff must know where the operating manual for each dry cleaning machine can be found and have ready access to it.
- 1.6** All operating staff must be trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents. The training received must be recorded.
- 1.7** The machine shall be installed and operated in accordance with supplier recommendations, so as to minimise release of VOC to air, land and water.
- 1.8** In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator must:
 1. Investigate immediately and undertake corrective action; adjust the process or activity to minimise those emissions; and
 2. Adjust the process or activity to minimise those emissions; and
 3. Promptly record the events and actions taken.
 4. In this condition abnormal emission will include any detectable solvent smell other than in the area of the dry cleaning machine.
- 1.9** In cases of non-compliance causing immediate danger to human health, operation of the activity must be suspended; and Environmental Services of Eastbourne Borough Council informed by telephone or facsimile message within 24 hours, with details of the nature of the problem, the action taken so far, and the proposed action to deal with the situation.
- 2.0** 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).
- 2.1** Where cleaning solvents containing VOC are not received in bulk they shall be stored:
 - a. In the containers they were supplied in with the lid securely fastened at all times other than when in use; and
 - b. within spillage collectors, of suitable impervious and corrosion-proof materials and capable of containing 110% of the largest container; and
 - c. away from sources of heat and bright light; and
 - d. with access restricted to only appropriately trained staff.

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

- 2.2** 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.
- 2.3** Spot cleaning with organic solvents or organic solvent borne preparations shall not be carried out unless they are the only method of treating a particular stain on a the material to be cleaned.
- 2.4** The dry cleaning machine loading door shall be kept closed when not in use.
- 2.5** 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.
- a. All machines installed after 19 May 2005 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.
 - b. All machines installed after 19 May 2005 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.
- 2.6** 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.
- All machines installed after 19 May 2005 shall have interlocks to automatically shut down the machine if the still, button trap and lint filter doors are not properly closed.
- 2.7** 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.
- 2.8** The heat source shall automatically switch off at the end of the distillation process.
- 2.9** The machine shall have a spillage tray with a volume greater than 110% of the volume of the largest single tank within the machine.

- 3.0** All machines installed after 19 May 2005 shall have a secondary water separator to minimise potential solvent losses.
- 3.1** Prior to disposal, containers contaminated with solvent shall be store 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.
- 3.2** 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
- 3.3** Equipment to clean up spillages must be quickly accessible in all solvent handling and storage areas.
- 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 6. The records shall be available within 7 days upon request by the regulator
- 3.6** 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.
- 3.7** A copy of this Permit shall be kept on the premises.

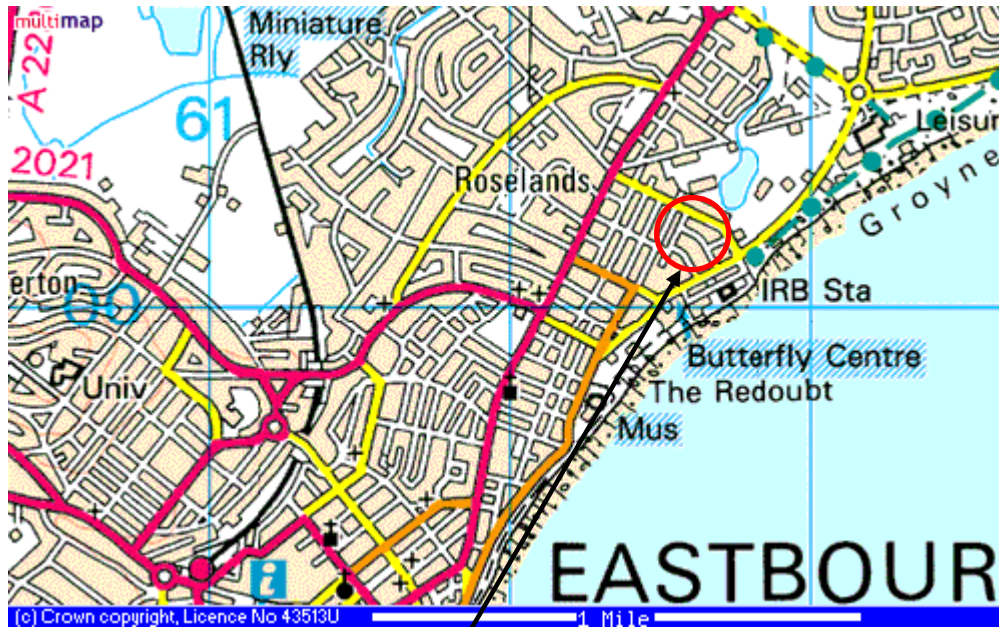
**New and Substantially
Changed Installations
Using PER Only**

- 3.8** Where PER is used within the installation a suitable continuous monitoring device for PER shall be installed within the operating area of dry cleaning machine to monitor for leaks and any other malfunctions which may lead to the release of PER.
- 3.9** The continuous PER monitoring device shall be maintained and calibrated in accordance with the manufacturers recommendations.
- 4.0** All PER machines shall have a secondary water separator followed by an activated carbon adsorption bed to minimise potential solvent losses.

Section Three

Location of Permitted Installation

Site Location Map PPC/DC1



**Fibrecare Drycleaners,
333 Seaside
Eastbourne.
East Sussex
BN22 7PA**

Section Four

Explanatory Notes And Appeals Procedure

Eastbourne Borough Council
The Pollution Prevention Control Act 1999
The Pollution Prevention & Control (England & Wales) Regulations 2000 SI 1973
(As Amended)

EXPLANATORY NOTE

These notes are provided for the operator of an installation or mobile plant to assist in the interpretation of their duties under the provisions of the above-mentioned legislation, with particular reference to the permit issued by Eastbourne Borough Council. These notes do not form part of the Permit or conditions attached to it.

1. RESIDUAL BAT CONDITION

You should note that regulation 11(2) of the Pollution Prevention & Control (England & Wales) Regs 2000 (the PPC Regs) require that installation and mobile plant should be operated in accordance with the general principles such that -

(a) all the appropriate preventative measures are taken against pollution, in particular through application of the best available techniques; and

(b) no significant pollution is caused.

Schedule 2 of the PPC Regs describes the concept BAT and the special requirements.

In relation to the Permit you should be aware that, amongst other aspects of the installation operation and management, this residual duty will apply to:-

- the control of emissions to ensure that offensive odours are not caused beyond the installation boundary,
- maintenance, service and repair of equipment,
- keeping of spares and consumables,
- the training of installation operators, and supervision of workers
- management of the installation in relation to maintenance of a high standard of housekeeping.

2. STATUTORY REQUIREMENTS

This Permit is issued under regulation 10 of the PPC Regs and does not detract from any of the following statutory requirements where applicable:-

- (a) The requirement to obtain Planning Permission for the installation and any new construction.
- (b) The requirement to obtain discharge consent from the Environment agency.
- (c) The requirement to obtain Building Regulation approval for any construction work.
- (d) The requirement of a Waste Disposal Licence.
- (e) The requirement to comply with the Health and Safety at Work etc Act 1974.

3. PUBLIC REGISTER

The Council is required by regulation 29 to maintain a Public Register containing information on all LAPPC installations and mobile plant. The register is available for inspection by the public free of charge during office hours (Monday to Friday 9.00am to 5.00pm) at

**Eastbourne Borough Council,
Environmental Health Department
1 Grove Road
Eastbourne
East Sussex
BN21 4TW**

Subject to exclusions of commercially confidential information and information affecting national security, registers will contain the following:

- a. Applications for a permit;
- b. Notices asking for information and responses to such;
- c. Advertisements and representations in response to such (unless requested not to by the person responding)
- d. In the case of c) above, a statement to the effect that representations were made but have been omitted – must not identify the person making the representation;
- e. Statutory consultee responses to applications or applications for variations;
- f. Permits;
- g. Notifications of changes in the operation of installations;
- h. Applications for variations, transfers or surrenders of permits;
- i. Variations, transfers and surrenders granted;
- j. Revocations;
- k. Enforcement or suspension notices;
- l. Notices withdrawing enforcement and suspension notices;
- m. notice of an appeal including the grounds of the appeal, relevant correspondence between the appellant and the regulator, and the decision/notice which is the subject of the appeal;
- n. Representations in response to appeal (unless requested not to by the person responding);
- o. In the case of n) above, a statement to the effect that representation were made but have been omitted – must not identify the person making the representations;
- p. The appeal decision and any accompanying report;
- q. Convictions, formal cautions; to include the name of the person, date of conviction/caution, and (where appropriate) penalty and name of court. This requirement does not override the Rehabilitation of Offenders Act 1974 regarding spent conditions, and authorities must take care to remove relevant entries at the appropriate time;

- r. Monitoring data obtained by the authority from its own monitoring, or sent to the authority on accordance with a permit condition or regulation 28(2) notice;
- s. If any monitoring information is omitted because it is commercially confidential, the authority must put a statement on the register indicating whether relevant permit conditions are being complied with, based on the withheld information;

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

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 person" (regulation 31(12) of the 2000 Regulations).

Local authorities will also take into account whether the information at issue could be obtained or inferred from other publicly accessible sources.

The local authority will determine this request within 28 days of the date of such an application and will issue a Determination Notice detailing their decision. The notice may specify a time period over which the information is to remain commercially confidential (if not specified, it will be four years beginning with the date of the determination). The operator may appeal to the Secretary of State within 21 days of the notification of the decision.

If the application is granted the local authority will place a statement on the public register stating that certain information has been withheld and stating the reasons why, plus whether this information is relevant to a permit condition, and whether the permit condition has been complied with.

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.

4. UPGRADING PROGRAMMES

The following information does not comprise part of the Permit, but contains guidance, which should be noted when considering the upgrading programme.

Aim of Upgrading Programme

To identify the areas where the existing installation does not meet the required standards ("new process" standards), as detailed in the relevant Secretary of State's Process Guidance Note, the steps to be taken to meet these standards, and the time-table of dates by which these steps are to be implemented. (You are advised to refer to the Department of Environment, General Guidance Note 4 - Interpretation of terms used in Process Guidance Notes (available from H.M. Stationery Office)).

Content of Upgrading Programme

There is not a specified format for an upgrading programme but, wherever possible, it should identify reasonably precise actions to be taken and the dates on which these actions will be instigated. If abatement plant is to be installed technical specifications and schematic drawings along with operational procedures should be detailing in the upgrading plan.

Council Action upon receipt of Upgrading Programmes

It is an offence not to submit the upgrading programme by the date specified in the Permit.

The Council will assess the adequacy of the submission and if satisfied with the content, will place it on the Public Register (operators may apply for matters which are considered to be commercially confidential to be excluded from the Register).

The Council will bring the upgrading programme within the terms of the Permit by issuing a Variation Notice to add the programme as a condition to the initial Permit. This will ensure that commitments given are made into enforceable conditions (this may not preclude changes to the programme where there are sound reasons for such a change).

5. FEES

In accordance with regulation 22(2)c of the PPC Regs, the holder of a permit is required to pay a fee for the subsistence of the Permit. This fee is payable annually on 1st April. You are advised that under the provisions of regulation 21 of the PPC Regs, if you fail to pay the fee due promptly, the Council may revoke the Permit.

6. TRANSFER OF PERMITS

Under the provisions of regulation 18 of the PPC Regs, where you wish to transfer the Permit to another person (the proposed transferee) then the operator and the proposed transferee shall jointly make an application to the Council. The council will determine the transfer application within 2 months. A fee is also available. For further details on this please contact the Council.

7. PROCESS CHANGES

Under the provisions of regulation 16 of the PPC Regs, you are required to notify the Council of any proposed change in operation at least 14 days before making the change. This must be in writing and must contain a full description of the proposed change in operation and the likely consequences.

If the change could result in the breach of the existing permit conditions or is likely to require the variation of permit conditions then you must apply in writing under regulation 17(2), or involves a SUBSTANTIAL CHANGE to the installation you will be required to submit an application, pay the relevant fee and advertise the application accordingly. You should notify the Council 28 days before undertaking such changes in the installation operation. You may serve a Notice on the Council requesting that they determine whether any change, which is proposed, would constitute a substantial change before you proceed with application.

8. APPEALS

Under regulation 27(1)c of the 2000 Regulations operators have the right of appeal against the conditions attached to their permit. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State given under regulations 12(15) (directions to regulators), 36 (general directions to regulators), paragraph (4) of regulation 27 (Appeals), paragraph 14(6) of Schedule 4 (directions determining applications for permits) or 6(6) of Schedule 7 (directions determining variation of permits).

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

Notice of appeal against the conditions attached to the permit must be given within six months of the date of the notice, which is the subject matter of 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 charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide (see Schedule 8 of the 2000 Regulations, paragraph 1):

- 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 31 of the 2000 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
Environmental Appeals Administration
Room 4/19 - Eagle 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 Schedule 8, paragraph 4(10) of the 2000 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 claiming 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.

9. Secretary of State's Guidance

This permit is covered by the relevant Secretary of State's Guidance and :

PG6/34(04) Secretary of State's Guidance for Respraying of Road Vehicles	www.defra.gov.uk/environment/index.htm
Pollution Prevention and Control Act 1999	
Pollution Prevention and Control (England & Wales) Regs 2000	ISBN – 0- 099621 -6
General Guidance Manual on Policy and Procedures for A2 and B Installations	ISBN – 0-85521-028-1

10. Reporting Requirements and Contact Details

Where a Permit condition imposes a requirement to forward documents to the Local Authority or to report a specified occurrence the following address and telephone number shall be used:

By Post

**Eastbourne Borough Council,
Environmental Health Department
1 Grove Road
Eastbourne
East Sussex
BN21 4TW**

By Telephone

During office hours: 01323 415379
Facsimile No.: 01323 415997

Email :- environmentalhealth@eastbourne.gov.uk