

Environmental Permit

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2010 (as amended)

Wm Morrison Supermarkets PLC Ascot Road Watford Hertfordshire WD18 8AA

Regulated activity: Dry Cleaning

Permit Number: DC/12/13

Permit Issued by:

Community and Customer Services Watford Borough Council Town Hall Watford Hertfordshire WD17 3EX

Tel: (01923) 226400 Fax: (01923) 278100

Email: envhealth@watford.gov.uk Website: www.watford.gov.uk

The address for all correspondence in relation to this permit

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Permit Status Log

Detail	Date	Comment
Application received	11 September 2013	Duly Made
Draft EPR Permit	19 September 2013	PG 6/46 (11) Permit
Final EPR Permit	26 September 2013	Issued

Introductory Note

This introductory note does not form part of the Permit.

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 (S.I 2010 No.675) (as amended) ("the EP Regulations") to operate an installation carrying out one or more of the activities listed on Schedule 14 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 specific conditions are subject to the Best Available Techniques condition placed in the permit, that the operator shall use the best available techniques for preventing or, where that is not practical, reducing emissions from the installation.

Please note techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Brief description of the installation regulated by this Permit:

Dry Cleaning Installation as prescribed by Schedule 14 to the Environmental Permitting (England and Wales) Regulations 2010 (as amended) utilising the equipment as detailed in Schedule A of this Permit, subject to the following conditions.

Confidentiality

The Permit requires the operator to provide information to Watford Borough Council. The Council will place the information onto the public registers in accordance with the requirements of the EP Regulations. If the operator considers that any information provided is commercially confidential, it may apply to the Council to have such information withheld from the register as provided in the EP Regulations. To enable the Council to determine whether the information is commercially confidential, the operator should clearly identify the information in question and should specify clear and precise reasons.

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 24, or in accordance with Regulation 25 of the EP Regulations for permits to which Regulation 24 does not apply.

Variations to the permit

Your attention is drawn to the Variation notification procedure condition in the permit. This permit may be varied in the future. If at any time the activity or any aspect of the activity regulated by the following conditions changes such that the conditions no longer reflect the activity and require alteration, the Council shall be contacted.

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 21 of the EP Regulations. A transfer will be allowed unless the Council 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.

Responsibility under workplace health and safety legislation

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

Appeal against permit conditions

Anyone who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State. Appeals must be made in accordance with the requirements of Regulation 31 and Schedule 6 of the EP Regulations.

Appeals should be received by the Secretary of State at the following address:

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

Please Note: An appeal brought under Regulation 31 (1) (b) and Schedule 6, in relation to the conditions in a permit will <u>not</u> 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 also allows the Secretary of State 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.

References

- 1. Process Guidance Note 6/46 (11): Statutory Guidance for Dry Cleaning; Department for Environment Food and Rural Affairs; Revised June 2013.
- 2. Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B Installations; Department for Environment Food and Rural Affairs; April 2012.
- 3. Environmental Permitting (England and Wales) Regulations 2010, Statutory Instrument 2010 No. 675 (as amended).

End of introductory note

Environmental Permit

Permit Reference Number:

DC/12/13

Watford Borough Council ("the Regulator") in exercise of its powers under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010 (S.I 2010 No 675) (as amended), hereby authorises:

Wm Morrison Supermarkets PLC ("the Operator")

Whose registered office is:

Wm Morrison Supermarkets PLC Hilmore House Gain Lane Bradford BD3 7DL

Company Registration Number: 358949

To operate an installation at:

Wm Morrison Supermarkets PLC Ascot Road Watford Hertfordshire WD18 8AA

The operator is authorised to carry out the following activity:

Dry Cleaning as prescribed by Schedule 14 to the Environmental Permitting (England and Wales) Regulations 2010 utilising the equipment detailed in Schedule A of this Permit, and subject to the following conditions.

Signed	Date
Alan Oarrah	26 September 2013
Alan Gough Head of Community and Customer Services	
The Authorised Officer for this purpose	

Residual BAT Condition

The best available techniques shall be used to prevent, or where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the activity which is not specifically regulated by any condition of this permit.

Conditions

- 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, water-proofing 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. Further, the operator should retain records of solvent purchased for at least 12 months.

Note: The solvent management balance sheet for dry cleaning installations in Schedule B to this permit can be used to demonstrate compliance with conditions (1) and (2) (above).

3. A copy of the following shall be sent to the Council at the frequency given below:

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 on 31 January
the record of regular maintenance during the	Once a year on 31 January
previous 12 months referred to in condition 4.	
a list of staff nominated and trained, in accordance with conditions (6) and (7)	Once a year on 31 January

- 4. The operator, (or a suitably qualified engineer), shall implement the schedule of procedures, checks and maintenance requirements to each dry cleaning machine as listed in B1.5 of the permit application dated 11 September 2013.
- 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 (4).
- 6. All operating staff must know where the operating manual for each dry cleaning machine can be found and have ready access to it.
- 7. 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.
- 8. The machine shall be installed and operated in accordance with supplier recommendations, so as to minimise the release of VOC to air, land and water.

^{*} Quarterly submission of data will be initially required; the first submission is required after the first 3 months of operation, and every 3 months thereafter until otherwise agreed.

- 9. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
 - investigate immediately and undertake corrective action; and
 - adjust the 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.
- 10. In cases of non-compliance causing immediate danger to human health, or threatens to cause an immediate significant adverse effect upon the environment, operation of the activity shall be suspended; and the regulator informed within 24 hours.
- 11. Dry cleaning machines shall be operated as full as the type of materials to be cleaned will allow (for instance, 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).
- 12. 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; and
 - within spillage collectors, of suitable size, made of impervious and corrosion-proof materials; and
 - away from sources of heat and bright light; and
 - with access restricted to only appropriately trained staff; and
 - the lids of the containers shall only be removed when the container is next to the cleaning machine ready 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.

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

- 13. Spot cleaning with organic solvents or organic solvent borne preparations shall only be carried out if no other method of treating a particular stain on the material to be cleaned is available.
- 14. The dry cleaning machine loading door shall be kept closed when not in use.

Note: Where an extract fan is fitted to maintain a negative pressure within the machine during unloading, the exhaust from this fan should be directed to a carbon adsorption filter prior to discharge to atmosphere.

- 15. 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.
 - 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.
 - 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.
- 16. 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.
- 17. The still shall have a thermostatic control device or equivalent with which to set a maximum temperature, in accordance with the manufacturer's recommendations for the solvent used.

18. All new, and substantially refurbished machines, shall have a spillage tray with a volume greater than 110% of the volume of the largest single tank within the machine.

Note: This does not remove the need to comply with health and safety recommendations relating to the fitting of spill trays to existing machines.

- 19. All machines installed after 19 May 2005 shall have a secondary water separator to minimise potential solvent losses. Where this is not an integral part of the machine then the operator should select and install a method that will achieve an equivalent degree of separation.
- 20. Prior to disposal, containers contaminated with solvent shall be stored with the lids securely fastened to minimise emissions from residues during storage, and labelled so that all who handle them are aware of their contents.

Note: Empty containers should, where possible, be returned to the supplier.

- 21. 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; 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. A concrete floor, (if necessary coated with flooring paint), is seen as sufficient to demonstrate compliance with 'suitable impervious floor'.

- 22. Equipment to clean up spillages must be quickly accessible in all solvent handling and storage areas.
- 23. 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.
- 24. 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.

New and Substantially Changed Installations Using PER Only

The following requirements only apply to new or substantially changed installations using PER.

25. Where a continuous PER monitoring device has been fitted for Health and Safety reasons it shall be maintained and calibrated in accordance with the manufacturer's recommendations. As a high reading on the monitor indicates leaks and other malfunctions which have lead to the release of PER, then this will also indicate potential non-compliance with the environmental requirements of this permit. (An alternative is to use a hand held device to detect leaks, as this can be used in close proximity to the machine to detect minor leaks that would not be detected by a remote monitor).

End of Conditions

Schedule A: Equipment Specification, I	nstallation Location and Site Layout

Equipment Specification:

Make	Model	Serial Number	Load Capacity	Date of Installation	Dry Cleaning Solvent
Firbimatic	SX2018	192L30234	18 kg	30 October 2013	Perc

Installation Location:



Schedule B: Solvent and Product Cleaned Inventory

Reproduced from Process Guidance Note 6/46 (11) Revised June 2013

Weekly Inventory Sheet: All Installations

Premises name:					Machine r	name or ref	erence		Solvent U	Solvent Used: Week start date		rt date or			
					number:								week nur	nber:	
Load Number		1	2	3	4	5	6	7	8	9	10	11	12	Daily total weight (kg)	Solvent added (litres)
Monday	Weight (kg)														
Tuesday	Weight (kg)														
Wednesday	Weight (kg)														
Thursday	Weight (kg)														
Friday	Weight (kg)														
Saturday	Weight (kg)														
Sunday	Weight (kg)														
Make a note of the r B = Blankets	eason why an D = Delicates		eight load	was clea O = C		W = Wed	dding dress	.				Total f	or week:		
Maintenance or test this week	ing required	Mo	nday	Tu	esday	Wedi	nesday	Thu	rsday	Fri	day	Sat	turday	Sur	nday
Still maintenance															
Lint filter checked &															
Button trap checked	l & cleaned														
Notes:															
List your planned pr you have done for e servicing or solvent	ach maintena	nce item v	vith a tick.							Signed:	:				

Note: Where the weight of clothes added is recorded in units other than kilograms, then all other measurements must be made using units that are compatible with the unit used for the weight of clothes.

Monthly Inventory Sheet: All Installations									
Site:	Solvent:								
Machine:			Month and Ye	ear:					
Week starting (d	ate)								
Weight of work p	processed (kg)				Monthly Total (A)				
Solvent added (I	itres)				Monthly Total (B)				
Solvent sent for	disposal				Monthly Total				
Total waste drun	n volume (litres)				(C)				
Still cleaning cor 0.15 for powder to 0.35 for ecologic 0.5 for pump out	filter rake-out, o al filter rake out				(D)				
Compliance this	month								
Table A: Weight cleaned	Solvent	Solvent	Net solvent use	Consumption	On target?**				
(kg) (A)	added (litres) (B)	disposed (litres) (C x D = E)	(litres) (B – E = F)	(kg/litres) (A ÷ F = G)	(Yes / No)				
(-7	(-)	(0.11.2 -)	(= = -)	(**************************************	(1007110)				
** The monthly result should only be used to provide a guide as to the performance of the machine. Solvent input and waste recovered will vary each month affecting the Consumption (G). Where: Perchloroethylene is used, if G >80 kg/l = on target Siloxane is used, if G >48.5 kg/l = on target Hydrocarbons are used, if G >48.5 kg/l = on target									
NULES.									

	Date Submitted:	
Site:	 Year:	
Machine:	Solvent:	

Monthly Compliance (complete "Table 1" with results from "Table A" from monthly inventory sheet)

Table 1:

Month	Weight cleaned (kg)	Solvent added (litres)	Solvent disposed (litres)	Net solvent use (litres)	Consumption (kg/litres)
Total	(A)	(B)	(C)	(D)	

Annual Compliance

Spot cleaning correction factor (litres)	(E)	
A figure of 6.25 litres per annum should be us	ed as the spot cleaning factor, whichever solvent is used for	
cleaning purposes		
Corrected solvent input (litres)	(D + E = F)	
Solvent efficiency (kg/litre)	(A ÷ F = G)	
Specific Gravity of solvent being used:	(H)	
Perchloroethylene : 1600g/l		
Siloxane : 970 g/l		
Hydrocarbons : 970 g/l		
Solvent emission (g/kg)	(H ÷ G = I)	
Have you met the requirement of the regula	ations? (ls "l" >20g/kg ?)	