



Variation Reference number 40/18

Schedule 2

Telford & Wrekin Council (The Regulator) in exercise of its powers under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2016, hereby permits:

The Operator	Peter Posh Ltd
Installation Address	Unit D3 Stafford Park 11 Telford Shropshire TF3 3AY
Permit Reference	07/00055/DC/220518
Grid Reference	SJ 7210 0860
Registered Address	Peter Posh Ltd D3 Stafford Park 11 Telford Shropshire TF3 3AY
Company Number	02505295

To carry out the activity of dry cleaning as defined under Schedule 14 of The Environmental Permitting (England and Wales) Regulations 2016 ("The Regulations") and other activities as listed and described below within the installation boundary marked on the attached plan in appendix 1 and in accordance with the conditions within this permit.

Signed: *N. Minshall*

Date: *26.5.2018*

N. Minshall
Head of Service

Authorised by the Borough of Telford and Wrekin to sign in that behalf



Introductory Note – This Introductory note does not form part of the permit.

Determination of application

Particular conditions have been inserted as representing the authority's judgement of what constitutes BAT, having regard to the statutory guidance issued by the Secretary of State and to all site specific considerations.

Permit History

Provenance	Relevant Dates
Date Application Made (Deemed application)	13.11.2006
Date 'Duly Made'	13.11.2006
Date Permit First Issued	15.11.2006
Date of Variations	05.11.2007
	06.08.2009
	20.11.2015
	08.01.2018
Date of Latest Variation	

Description of the Installation

This installation is permitted to dry clean garments and materials using a solvent known as perchloroethylene (PER). The solvent is used within an enclosed dry cleaning machine which is designed to minimise emissions to atmosphere.

End of Introductory Note



Permit Conditions

General

2. The best available techniques shall be used to prevent, or where that is not practicable, reduce the emissions from the installation in relation to any aspect of the activity which is not specifically regulated by any condition of this permit.
3. An appropriate person (and deputy) shall be appointed as the primary point of contact with the regulator. The regulator shall be informed in writing of the appointed person (and deputy). In the event of a different person being appointed, the regulator shall be informed without delay.
4. A copy of this permit shall be kept at the installation. All relevant staff shall be made aware of its content and shall be told where it is kept.
5. All operating staff shall know where the operating manual for each dry cleaning machine can be found and have ready access to it.
6. If the operator proposes to make a change in the operation of the installation, they must, at least 14 days before making the change, notify the regulator on the appropriate form. The notification must contain a description of the proposed change in operation. A 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

Operations

7. The Operator is permitted to operate the dry cleaning machine using the cleaning solvent stated in Table 1 below.

Make	Model	Serial Number	Load Capacity	Date of Installation	Solvent used
Firbimatic	Vortex L2020	182M80181	20Kg	2009	PER
Firbimatic	L2025	183C40141	25Kg	11.4.2015	PER

8. 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. This includes; dry cleaning solvent, water-proofing solutions and spot cleaning solutions. The documents in Appendix 3 shall be used to demonstrate compliance with this condition, or a document approved by the regulator.



9. 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.
10. Dry cleaning machines shall be operated as full as the type of materials to be cleaned will allow. This shall mean:
 - a) Full loads for light non delicate materials.
 - b) Part loads for delicate and/or heavy materials, such as, wedding dresses and blankets.
11. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
 - d) investigate immediately and undertake corrective action; adjust the activity to minimise those emissions; and
 - e) adjust the activity to minimise those emissions; and
 - f) promptly record the events and actions taken.

Abnormal emission shall include any detectable solvent smell other than in the area of the dry cleaning machine.
12. 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 dry cleaning machine shall be suspended; and the regulator informed within 24 hours. The operation of the dry cleaning machine shall not recommence until the non-compliance is rectified to the satisfaction of the regulator.
13. Cleaning solvents 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 collector, of suitable size, made of impervious and corrosion-proof materials; and
 - c) away from sources of heat and bright light; and
 - d) with access restricted to only appropriately trained staff, and
 - e) 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.
14. The dry cleaning machine loading door shall be kept closed when not in use.
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.
16. The permitted dry cleaning machine 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.



17. The permitted dry cleaning machine 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.
18. The permitted dry cleaning machine shall have interlocks to automatically shut down the machine if the still, button trap and lint filter doors are not properly closed.
19. 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.
20. The permitted dry cleaning machine shall be placed within a spillage tray with a volume greater than 110% of the volume of the largest single tank within the machine.
21. The permitted dry cleaning machine shall have a secondary water separator to minimise potential solvent losses.
22. Where this is not an integral part of the machine then the operator shall select and install a method that will achieve an equivalent degree of separation.

Where this is followed by an activated carbon unit, then the operator will need to demonstrate adequate procedures are in place to detect when the unit requires disposal via an acceptable route.
23. 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.
24. Solvent contaminated waste, for example still residues, shall be stored:
 - a) in suitable sealed containers with the lid securely fastened at all times other than when in use; and
 - b) on a suitable impervious floor; and
 - c) away from any drains which may become contaminated with residues as a result of spillage,
 - d) away from sources of heat and bright light; and
 - e) with access restricted to only appropriately trained staff.
25. Equipment to clean up spillages shall be quickly accessible in all solvent handling and storage areas.



Records

26. 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. Further, the operator shall retain records of solvent purchased and waste solvent removed. The documents in Appendix 4 shall be used to demonstrate compliance with this condition, or a document approved by the regulator.

27. The following information shall be sent to the regulator unless otherwise stated, at the frequency given in table 2 below:

Table 2 – Information required by the regulator	
Information to be sent to the Council	Frequency at which information shall be sent
The monthly inventory sheets for the previous quarter. The documents in Appendix 4 shall be used to demonstrate compliance with this condition, or a document approved by the regulator.	For records relating to 1 Jan to 31 March shall be sent no later than 30 April of each year. For records relating to 1 April to 30 June shall be sent no later than 31 July of each year. For records relating to 1 July to 30 September shall be sent no later than 31 October of each year. For records relating to 1 October to 31 December shall be sent no later than 31 January of each year.
The record of regular maintenance during the previous 12 months, referred to in condition 30.	Once a year no later than 31 January of each year.
a list of staff nominated and trained, in accordance with condition 32.	Once a year no later than 31 January of each year.



28. The operator shall maintain records incorporating details of all maintenance, testing, repair work carried out on the dry cleaning machine and the scales used to weigh the loads, along with details of training required under condition 32.
29. All records required to demonstrate compliance with any conditions of this Permit shall be kept in an organised manner. The records shall be kept electronically or in paper form. Records:
 - d) Must be legible and any amendment entered into a record shall be made in such a way as to leave the original clear and legible.
 - e) Records shall be kept for a period of 3 years, unless otherwise stated.
 - f) Records shall be kept on-site for a minimum of 12 months. Records kept off-site, must be made available within 7 days of any request by the regulator.
30. All documentation required to be submitted to the regulator to demonstrate compliance with relevant conditions, shall be submitted in an electronic format. Submissions shall be sent to: environmental.health@telford.gov.uk .

Maintenance

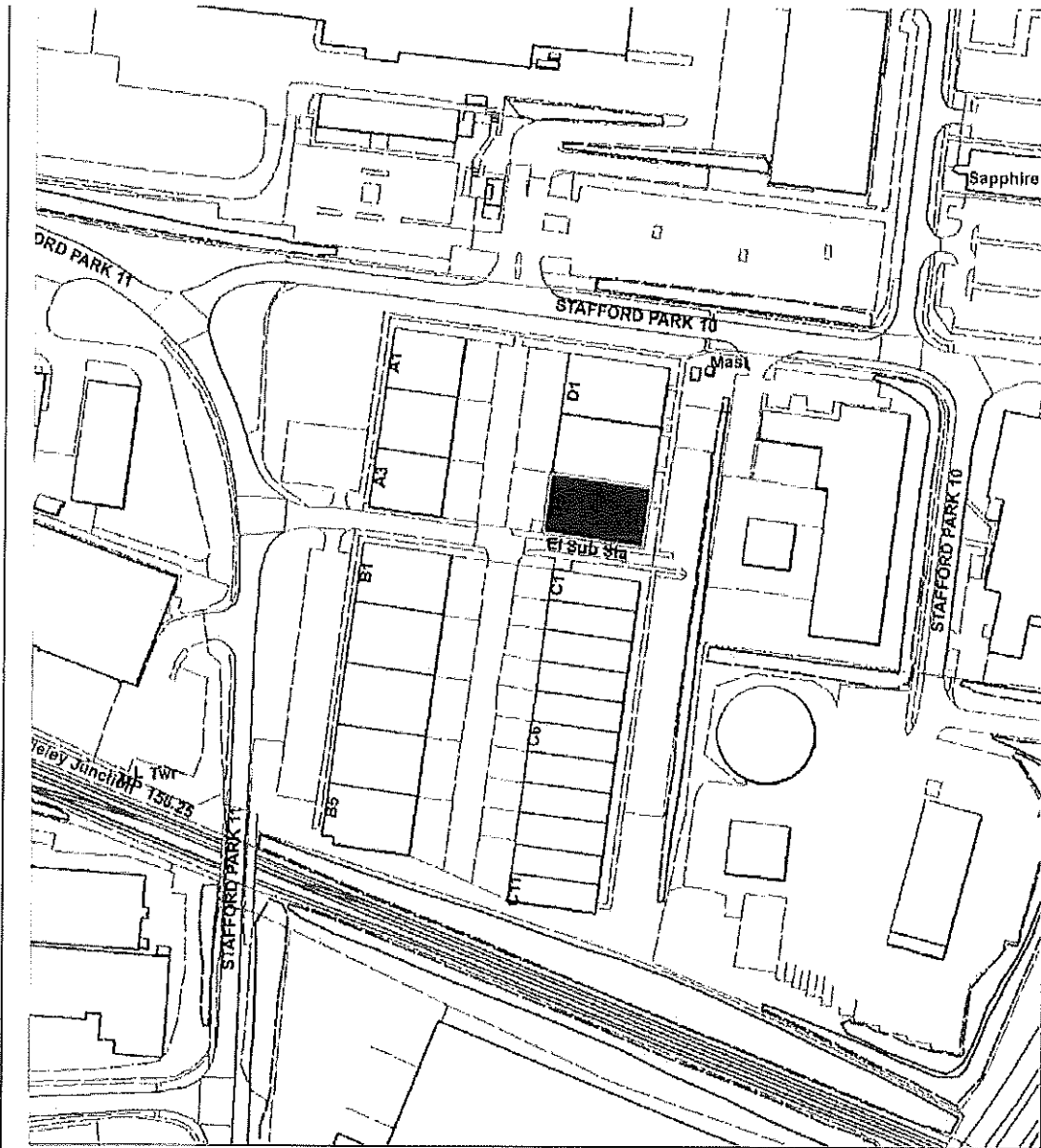
31. The operator, (or a suitably qualified engineer), shall implement the schedule of procedures, checks and maintenance requirements to each dry cleaning machine as required by the manufacturer.
32. Spares and consumables in particular, those subject to continual wear shall be held on site, or shall be available at short notice from guaranteed suppliers, so that plant breakdowns can be rectified rapidly.

Training

33. All operating staff shall be trained in the operation of each dry cleaning machine and the control and use of dry cleaning solvents. The training received shall be recorded.



Appendix 1. Location of Installation and installation boundary

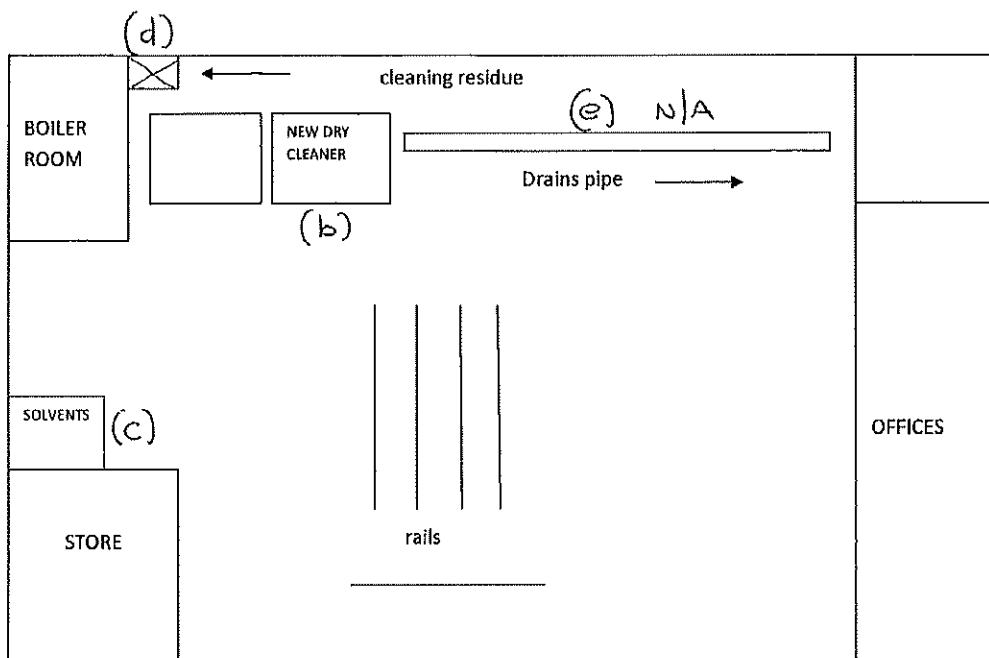




Appendix 2. Site map

B1

(a) PETER POSH, UNIT 3 STAFFORD PARK 11, TELFORD TF3 3AY



B2

(a) Solvent - Locked metal cabinet or in machine tanks

(b) Waste - Locked barrel



Telford & Wrekin

C O U N C I L

Pollution Prevention Control Act 1999
 Environmental Permitting (England and
 Wales) Regulations 2016

Appendix 3 – Weekly Inventory Sheets

Premises name: Load Number	Machine name or reference number:							Solvent Used		Week start date or week number		Solvent added (litres)	
	1	2	3	4	5	6	7	8	9	10	11		12
Monday													
Tuesday													
Wednesday													
Thursday													
Friday													
Saturday													
Sunday													
Make a note of the reason why any under-weight load was cleaned: B = Blankets D = Delicates L = Lights O = Other W = Wedding dress													
Maintenance or testing required this week	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total for week:					
Still maintenance													
Lint filter checked & cleaned													
Button trap checked & cleaned													
Notes:													
List your planned preventative maintenance in the 'maintenance or testing required this week' boxes. Record what you have done for each maintenance item with a tick. Make notes about Solvent tank levels, other maintenance, servicing or solvent leaks / spills in the space above.											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

Site: _____ Solvent: _____
Machine: _____ Month and Year: _____

Week starting (date)

--	--	--	--	--	--

Weight of work processed (kg)

						Monthly Total (A)
--	--	--	--	--	--	--------------------------

Solvent added (litres)

						Monthly Total (B)
--	--	--	--	--	--	--------------------------

Solvent sent for disposal

						Monthly Total
Total waste drum volume (litres)						(C)
Spill cleaning correction factor : 0.15 for powder filter rake-out, or 0.35 for ecological filter rake out, or 0.5 for pump out						(D)

Compliance this month

Table A:

Weight cleaned (kg) (A)	Solvent added (litres) (B)	Solvent disposed (litres) (C x D = E)	Net solvent use (litres) (B - E = F)	Consumption (kg/litres) (A ÷ F = G)	On target? ** (Yes / No)

** 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

Notes:



This SECTION does not comprise part of the permit, but contains guidance relevant to it.

Inspections

Regular inspections will be made by officers of Telford & Wrekin Council (without prior notice), in order to check and ensure full compliance with this permit. Inspection will be carried out in accordance with a risk assessment, and/or following from any complaints or applications.

BAT (Best Available Techniques)

Article 3(10) of the Industrial Emissions Directive (IED) defines "best available techniques" as follows:

"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 that is not practicable, generally to reduce emissions and the impact on the environment as a whole".

- "techniques" shall include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned,
- "available" techniques shall mean those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages, whether or not the techniques are used or produced inside the Member State in question, as long as they are reasonably accessible to the operator,
- "best" shall mean most effective in achieving a high general level of protection if the environment as a whole.

Confidentiality

The permit requires the operator to provide information to the regulator. The regulator will place the information onto the public register in accordance with the 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 Regulations.

Health and Safety at Work and Other Statutory Requirements

Compliance with this permit does not necessarily infer compliance with any other legislation.

Transfer of the permit

Before the permit can be wholly or partially transferred to another person, an application to transfer the permit has to be made jointly by the existing and proposed operators. A transfer will be allowed unless the regulator considers the proposed operator will not be the person who will have control over the operation of the installation, or will not comply with the conditions of the transferred permit.



Surrender of the permit

Where the operator intends to cease the operation of an installation (in whole or in part). In the case of Part B Permits, the operator must notify the Council on the appropriate form in accordance with Regulation 24. For A2 permits, the operator must apply for a surrender, using the appropriate form and in accordance with Regulation 25 and part 1 of Schedule 5.

Risk Rating

Procedures and records shall be examined during inspections and will be referred to during the Department of Food and Rural Affairs (DEFRA) risk rating, carried out to determine the risk category: LOW, MEDIUM or HIGH which will determine the annual subsistence fee and the inspection frequency of the regulator.

Enforcement

The operator will be liable to enforcement action where: -

- a) the operator fails to comply with or contravenes any permit condition;
- b) a change is made to the installation operation without prior notification of the change to the regulator;
- c) intentional false entries are made in any record required to be kept under the conditions of the permit;
- d) false or misleading statement is made.

Any enforcement action is taken in accordance with the regulator's enforcement policy.
<http://www.telford.gov.uk/downloads/file/2287/public-protection-enforcement-policy>

Annual Subsistence Charge

An annual subsistence fee is payable in order to operate your installation. An invoice will be issued annually by the regulator which will include details of how to pay. The charges are based on the DEFRA risk rating. Details of the risk assessment can be found at:
<https://www.gov.uk/government/collections/environmental-permitting-resources-for-local-authorities>

You are reminded that failure to pay the subsistence fee may result on the Permit being revoked. It is an offence to operate a regulated facility without a permit and upon summary conviction liable to a maximum fine of £50,000 and/or imprisonment.

Appeal against Regulatory Action



The operator can appeal against regulatory action by the regulator to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be made in accordance with Regulation 31 and sent to the Secretary of State for Environment Food and Rural Affairs. The appeal form and guidance can be found at:

http://www.planning-inspectorate.gov.uk/pins/environment/environment/environmental_appeals/environmental_permitting_appeal_form.pdf

There are time limits for making an appeal as follows:

- a) in relation to an appeal against a revocation notice, before the notice takes effect;
- b) in relation to the withdrawal of a duly-made application under paragraph 4(2) of Schedule 5, not later than 15 working days from the date of the notice served under that paragraph;
- c) in relation to a variation notification, a suspension notice, an enforcement notice or a landfill closure notice, not later than 2 months from the date of the notification or notice;
- d) in any other case not later than 6 months from the date of the decision or deemed decision.

Please note:

An appeal 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.

Contact Numbers for the Regulator

The Regulator is the Public Protection Team of Telford & Wrekin Council. They can be contacted on 01925 381 818. You may also contact them by email at any time. environmental.health@telford.gov.uk

Correspondence Address

All correspondence to Telford & Wrekin Council relating to this information shall be addressed to: Customer and Neighbourhood services, public Protection, Telford and Wrekin Council, Addenbrooke House, Telford, TF3 4NT