



July 2006



DON'T FORGET all applications
for existing dry cleaners must be
duly made by 31 October 2006

31 October deadline is fast approaching

⇒ We have just issued a press notice reminding dry cleaners of the 31st October deadline and the consequences of their missing it, including a higher application fee (see below). We gather that one of the two main dry cleaning magazines is having a spread on SED/PPC in August.

The press notice is attached to this edition of *Update* and can also be found at www.defra.gov.uk/news/2006/060713c.htm

It makes it clear that dry cleaners are responsible for applying in time, but also says that we envisage local authorities working with them to achieve this.

To check on progress, we have just done a quick random sample survey of 20 LAs. The main findings from this straw poll are:

- all authorities had generated lists of local dry cleaners
- all but one authority had sent letters to them
- several had followed up the letters with visits; others had opted for repeat letters or phone calls
- rural authorities with relatively few dry cleaners appear very confident that applications will all be received by 31st October
- urban authorities, and especially those where a proportion of dry cleaners do not speak English as a first language, are finding it a bit more difficult

The sample suggests that a) most authorities are working hard to help dry cleaners over this hurdle, and b) although dry cleaners are ultimately responsible for making applications on time*, the smaller independent firms may be best helped by visits to follow up on the initial letter and phone contact.

Thank you to all those who we bothered during the survey

* The bottom line is that it is the responsibility of individual dry cleaners to make an application, irrespective of whether there is proactive support from the local authority. In law, any dry cleaner who does not apply for a permit by 31st October 2006 will risk prosecution (for information, the maximum penalty a Magistrate can impose for operating a listed activity such as dry cleaning without a permit is £20,000 per offence or imprisonment for up to 6 months). The business must apply whether or not they are reminded or helped by local authorities.

🕒 **Increased application fees from 1 November 2006**

⇒ We are proposing increasing the application fee for existing dry cleaners to £200 from 1 November 2006. The consultation proposing this was issued on 13th July for comments by 24th August 2006. This consultation is available at this address:-

www.defra.gov.uk/corporate/consult/drycleaners-pollutionfee/index.htm

🕒 **Feedback from operators**

⇒ Whilst many Local Authorities are putting a lot of effort into spreading the word about the new dry cleaning requirements amongst local businesses, Defra has received a worrying number of enquiries from confused Dry Cleaning operators who have not been able to get in touch with the "right" person at their Council and being passed from "pillar to post". Some have been told that their dry cleaning businesses are too small to require regulation under PPC and, more worryingly, some have been told that their Council know nothing of the requirements to regulate dry cleaners. This is probably mostly an issue of internal communications within individual authorities. Defra would urge LA pollution teams to ensure that their colleagues and their customer service people/switchboards are fully aware of the need to refer dry cleaning enquiries to them.

🕒 **'Early' applications for permits**

⇒ We have said previously to LAs that they should not be pushing dry cleaners for applications too early because that will mean that the cleaners will be spending money on the application before it is due. Furthermore, we also previously advised LAs not to decide applications too quickly because once a permit is issued it triggers the annual subsistence fee. Now we are approaching the final 3-month run-in to the application period, we would not expect any LAs to be asking operators to hold back with their applications.

🕒 **Textile Services Association**

- ⇒ The TSA have put 220 individual dry cleaners through an SED exam leading to an industry recognised qualification. It is being rolled out to more operators and a campaign to create wider awareness is being made through direct email shots to operators.

🕒 **Coin-Ops**

- ⇒ The consultation on the amendments to the regulations which give effect to the proposals outlined in AQ 22(05) – no application for Coin Operated dry cleaning machines which won't operate after 31st October 2007 - finished on July 14th 2006. It is available at www.defra.gov.uk/corporate/consult/ppc-amendregs-2006/index.htm.

🕒 **PPC/health and safety join-up – for information**

- ⇒ The trials at Peterborough unfortunately did not involve joint inspections with PPC officers. We are currently in contact with HSE and LACORS over how to progress this joining-up initiative.

🕒 **Training for Dry Cleaners**

- ⇒ **The Guild of Cleaners and Launderers have been running a series of Sunday seminars, followed by an examination on the requirements of SED. The next seminars are at Leeds/Bradford Airport Holiday Inn Hotel on 2nd July, on 16th July at the Holiday Inn Gloucester, commencing at 10 am, and on 25th July at Johnson the Cleaners, Central Processing Unit at Rugby.**

There is no admission charge for the seminars and they are open to non-Guild members. The Guild Examination can be taken after the seminar the cost of which is £10.00 (normal cost is £30.00). This is a special concession by the Guild to raise awareness of SED. Tea and coffee will be provided free of charge at each session.

Local authorities might like to encourage the dry cleaners they regulate to attend these events as a means of improving their knowledge base.

Following each Seminar the Guild holds an examination, which is a tick box exam, covering the requirements of SED and the use of solvent within dry cleaning. Candidates are given 75 minutes to answer 55 questions, and are given a choice of four possible answers to each question. Of the sessions previously held the success rate has been over 80% achieving the pass rate of 70% correct answers.

The seminars are aimed at those owning or working in dry cleaning, who wish to prove their competence and satisfy one of the requirements of the 'Directive' that they are qualified to 'handle dry cleaning solvents safely'. More seminars and exam sessions will be held depending on the demand from a particular region.

The GCL is the industry's recognised qualifying body and the seminar leaders have practical long term experience in the industry and also hold current qualifications in assessment procedures.

For more information on the Guild telephone 0161 483 4655 or visit the web site www.gcl.org.uk

This note was kindly supplied by Ken Cupitt, Guild Chief Examiner.

🕒 Non- High Street dry cleaning operations

⇒ Our researches indicate the following non-High Street dry cleaners:

- a few 4/5-star hotels
- firms cleaning aircraft and train seat covers
- workwear rental firms.

We would welcome feedback on any other categories that have been discovered.

🕒 Annual Reporting

⇒ Local Authority regulators must decide when the 12 month reporting year begins for each operator. It should not necessarily be a fixed calendar year for all operators.

🕒 Helpful Dry Cleaning Newsletter

⇒ www.laundryandcleaningnews.com

🕒 Q and A

Venting when machine doors are open

Q: I have come across a refrigerated closed-circuit machine which has a small fan which activates when the door is open. The fan vents externally. Should it be required to vent internally?

A: The air extracted using this fan can and should be vented via a 'pod' of active carbon to absorb the residual solvent vapour. If this is done, and the pod is changed regularly, there is no problem with external venting because the active carbon will remove the solvent vapour. The problem arises if the pod is not changed often enough. In those circumstances (which ought not to arise), we would not wish to see external venting, but internal venting may also not be acceptable for health and safety reasons. This issue is covered by condition (3) in the outline permit in appendix 3 of PG6/46: "(3) The operator 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....]".

Impervious floors

Q: Should concrete be regarded as 'impervious' for the purposes of specimen condition 22 (second bullet) in PG6/46?

A: Generally-speaking, yes. Given that the amounts of solvent seepage are likely to be quite small and that concrete has quite reasonable protective properties, we think it very unlikely to be BAT to require replacement of concrete floors or any other additional costly measures. If seepage is considered a potential problem in a particular case, a simple measure would be to apply a coat of flooring paint over relevant areas to improve imperviousness.

Solvent usage spreadsheet

Q: What happens when spreadsheets are filled in weekly and there are big differences in consumption from one week to another? Is there any way of making the solvent consumption calculation less daunting?

A: Regarding weekly distortions, compliance is demonstrated on an annual basis, so these short-term distortions are evened out. There is a printable version of the spreadsheet for those who don't have a computer (see below). We don't think that the weekly spreadsheets can be made any simpler, but we will look at the monthly one to see if there is any scope for improvements, and publish a revised version if we make any changes. We recognise, however much effort has been put into simplifying SED compliance and providing guidance, smaller dry cleaners in particular are being faced with a new regulatory regime, which can be daunting. It is for this reason that we are encouraging local authorities to take reasonable steps to work with dry cleaners to assist them, and our soundings suggest that many authorities are doing or planning this. Lastly, due to an error, the downloadable hard-copy spreadsheet was not posted in full on our website, although we did send local authorities the complete document with our email of 4 August 2005. We have put the full document on the website and apologise for the error. It is available at this web address:-

[www.defra.gov.uk/environment/airquality/lapc/aqnotes/aq16\(05\).htm](http://www.defra.gov.uk/environment/airquality/lapc/aqnotes/aq16(05).htm)

Record sheets of products cleaned

Q: Does it matter if loads are weighed in lbs rather than kgs?

A: It doesn't matter provided all the figures are converted to the same base, but completing spreadsheets with some figures in lbs and some in kgs will obviously distort the calculation. Local authorities should keep an eye open for such errors.

Next edition

⇒ **Please email Phil Pope or Imalka Oyewole with any issues you would like covered in the next edition of the *Update*.**

Any queries about dry cleaning and PPC/SED contact Defra or the Welsh Assembly Government. Also feedback is very welcome:-

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