

DRY CLEANERS - FREQUENTLY ASKED QUESTIONS FOR SCOTLAND

1. Do existing installations have to meet the new requirements by October 2007 as per the dry cleaning guidance note PG 6/46(04)?

Yes – applications must be made to SEPA by 31 October 2006 otherwise you will be in breach of the PPC Regulations. A permit will then be issued although probably not until early 2007. Once the permit is issued, you should operate your dry cleaning facility in a manner which complies with the conditions contained in the permit.

By 31 October 2007, your installation must meet the emission limit of 20g of solvent released per kg of products cleaned & dried which is demonstrated by keeping records of your solvent use and weight of clothes cleaned & dried at your installation and submitting these records on an annual basis to SEPA.

If you are (or suspect) that you will have difficulties in meeting the emission limit, you should look first at the way you operate your process and associated housekeeping issues before you consider such measures as secondary separators and activated carbon filters. SEPA will ask you to meet the emission limit but how you do that is up to you as the installation operator.

2. What is the status of DEFRA's Process Guidance Note 6/46(04) on Dry Cleaning <http://www.defra.gov.uk/environment/airquality/lapc/pgnotes/pdf/pg6-46.pdf> in Scotland?

The guidance given in Chapters 1 to 5 of this document is relevant to Scottish dry cleaning operations. You should note however that the outline application form and the outline permit in Appendices 2 and 3 are **not** applicable in Scotland.

3. Does the operation of a new installation (i.e. the opening a new dry cleaners or the re-location an existing one) come under the 14 day notification?

No – Under Regulation 12 of the PPC Regs 2000, there is a requirement for an operator to notify SEPA at least 14 days before making a change to the operation of an installation that is already permitted.

The operation of a new installation, i.e. a site not previously permitted for the operation of a dry cleaning operation, would require an application to be made and a permit issued by SEPA before operation commenced.

4. Do installations require PERC monitors or automatic interlocks?

No - these are Health and Safety requirements and therefore not regulated under PPC. This does not necessarily mean that your machine doesn't need one but that SEPA doesn't require them.

Dry cleaning shops are regulated for Health & Safety by the Local Authority's Environmental Health Department and they will be able to tell you what your H&S requirements are.

5. Are secondary water separators or activated carbon absorption beds required?

So long as your machine can meet the emission limit of 20g of solvent released per 1kg of product cleaned & dried, then no.

6. What will the monitoring compliance requirements be?

The draft SEPA permit gives the standard requirements for a dry cleaner. Basically, you will need to keep a record of the solvent quantities you use and the weight of clothes you clean & dry. You will also need to make an annual return of these figures to SEPA in order to prove you are complying with the emission limit. If you operate an industrial scale dry cleaning operation you may be asked to comply with additional conditions.

7. Spotting agents

SEPA has decided to exclude the amount of spotting agents used from the standard recording and reporting tables as we believe these amounts to be insignificant in comparison to the overall solvent used during normal dry cleaning. This should help to keep the reporting requirements simple and easy to comply with.

8. What would be an acceptable route for the disposal of waste water (from a secondary water separator) once it is collected?

Waste water from the secondary water separator should be free of solvent and as such may be disposed of via the sewer system. Water contaminated with solvent however should be disposed of by a suitably licensed waste disposal company.

9. Directive states that you must not release more than 20g of solvent for every kg of product cleaned and dried.

In practice this means:

For PERC

no more than 1 litre of PERC per 80kg of clothes cleaned
1litre of PERC x 1.6 = 1.6kg e.g. 1.6 / 80 = 0.02kg
so for 1kg of clothes, use no more than 0.02 kg (20g) or 0.0125litres
so for 1g of solvent, you can clean 50g of clothes

For HCS / Siloxane

no more than 1 litre HCS / siloxane per 48.5kg of clothes cleaned
1litre of HCS / Siloxane x 0.97 = 0.97kg e.g. 0.97 / 48.5 = 0.02kg
so for 1kg of clothes, use no more than 0.02kg (20g) or 0.02 litres
so for 1g of solvent, you can clean 50g of clothes

10. Subsequent Regulation

Once the permit is issued, the individual files will be passed to the local area teams who will be responsible for inspecting, investigating complaints / incidents, assessing reports, and any other subsequent involvement with dry cleaners.

11. What expertise in dry cleaning will SEPA inspectors have?

SEPA inspectors will be knowledgeable in SEPA's enforcement policy, in the PPC regime and they will have an understanding of dry cleaners and the associated industry. We expect the first year of regulation to be a bedding-in period and will educate operators before going down the enforcement route unless there is a serious breach of the permit. The inspection frequency will depend on the site in question and the associated hazards & risks but it's likely to be every three years.

12. Why are dry cleaners being charged a subsistence fee of £219 every year when the permit will only be reviewed every 8 years?

The 8-year review is a guidance timescale for SEPA to review dry cleaning permits to check that are still pertinent and correct. A review may result in no changes to a permit. Permit holders will not be required to re-apply for their permit.

The annual subsistence charge is made to recover our average annual costs for inspections, variations, reviews, audit monitoring, investigating complaints, and assessing site reports for the dry cleaning sector. Dry cleaning operators are in the lowest Air Pollution Control (APC) band. The highest (category 4 activities) band has an annual subsistence charge of £3810. More information on this charging scheme can be found on our website. Please click on the following link http://www.sepa.org.uk/pdf/charging/legal/apc/apc_scheme_2006.pdf

Glossary of Terms

PPC – Pollution Prevention and Control (Scotland) Regulations 2000

SED – Solvent Emissions Directive

SER – Solvent Emissions (Scotland) Regulations 2004

Emission Limit = 20g of solvent used per Kg of clothes dried & cleaned

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