Harlow District Council

Environmental Health Department The Water Gardens Harlow Essex. CM20 1WG



LA-PPC Inspection Report

General Information

| Inspection Type | Full / Compliance | | |
|--|---|--|--|
| Local Authority | Harlow District Council | | |
| Site Name and Address | larlow Dry Cleaners, 14 The Stow, Harlow, Essex, CM20 3AH | | |
| Installation Type | Dry Cleaning PG 6/46 (11) | | |
| Permit Reference | EPR/DC002 | | |
| Site Representative Seen Tony Ahmet | | | |
| Inspection Date | 12 th November 2015 | | |
| Duration of Inspection | 30 Minutes | | |
| Review of permit conditions undertaken | Not required | | |
| Regulator Harlow Council, representative; Steven Adams | | | |
| Report Date | 16 th November 2015 | | |

Recent History

| | Comments | Action |
|-------------------------------|----------|--------|
| Number of complaints received | None | None |
| Process/Installation changes | None | None |

Future Developments

| | Comments | Action |
|-----------------------------|----------|--------|
| Information relating to EPR | None | None |
| Other relevant information | None | None |

Risk Assessment

| Risk Assessment Score | 15 |
|-----------------------|---|
| Summary of changes | Risk score reduced as solvent loss calculated at 16.31g/kg of laundry, fully compliant. |

Summary of Inspection

The operation is well managed by experienced staff although no recorded training held.

Actions Required

| Reference to any breach of condition (or not) and other compliance issues as necessary | Condition 8.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. |
|---|--|
| Other relevant information | |

Compliance Checking

| Inspection List | √, × or N/A | Condition of observation deta | ails Action Require | |
|--|--------------|---|---|------------------|
| Logbook(s) | | | | |
| Records - Evidence of weekly weighing records Solvent usage being recorded Waste disposal records | | Comprehensive weekly records are being maintained. | None | |
| Servicing and maintenance records and checks availability of spares machine within bunded area machine door interlocked when in use 2 x water separators (post 2004 machines) Waste storage drum in suitable position (pumping drum usually kept adjacent to still) | v | Daily maintenance tasks are undertaken in-house. The machine is serviced annually; the current certificate is dated 24 th November 2014 the service engineer is available at short notice. | None | |
| Operating Instructions Available Machine manual available on site Training records for staff Metric weighing scales available | ✓ × | No formal training records are available. The operator has an understanding of how the machine works and as a copy of the operating manual. | Review any training or supervision requireme in the use of solvents a the dry cleaner. Please record all staff training | ents and e |
| Records of abnormal events and spillages + remedial action taken | | No events | None | |
| Regulator informed about abnormal events? | N/A | | | |
| Is the machine operated with full loads | \checkmark | | | |

| Is solvent used for stain spotting (practice dying out and soaps being used) | ~ | Soap based stain remover used | None |
|--|--------------|---|--|
| Storage of solvents; in manufacturer's containers, away from drains and sources of heat? No decanting to other containers | √ | Solvent in original containers ordered when required no bulk storage. | None |
| stored within a bund/tray (5/10 liter containers) | × | Waste solvent was stored on a concrete hard standing, away from surface water drains. Although the container was secure and suitable for purpose, it is not stored within a bund/tray. | Place a spillage tray under the container. |
| Spill kit available? | \checkmark | Old blankets and duvets available | None |
| Current permit on site | ~ | | |
| Site Inspection Premises well laid out and good house | ekeeping in | place, no solvent odour witnesse | d. |

Risk Assessment – Dry Cleaners

1 - Compliance Assessment Harlow Dry Cleaners 14 The Stow, Harlow, Essex.

| Scale of Non-Compliance | Possible Score | Score Awarded |
|---|------------------------|---------------|
| (A) Incident leading to justified complaint but no breach of any specific permit condition or of the general/residual BAT condition. | 0 points | 0 |
| (B) Incident leading to a justified complaint*. | 5 points per incident | 0 |
| (C) Breach of permit not leading to formal action. No recorded training record | 10 points per breach | 10 |
| (D) Incident leading to formal caution, Enforcement Notice or prosecution. | 15 points per incident | 0 |
| (E) Incident leading to a Prohibition Notice or Suspension Notice. | 20 points per incident | 0 |
| | Total (Max. 50): | 10 |

2 - Assessment of Monitoring, Maintenance and Records

| oring for Assessment of Monitoring, Maintenance and Records | | | | |
|---|----------------|----|--------|---------|
| | Possible Score | | Score | |
| Criterion | | No | N/A | Awarded |
| (A) Are loads weighed & weights recorded for all loads? Does the operator maintain a weekly inventory of solvent usage, product cleaned, and solvent waste sent for recovery or disposal? | 0 | 10 | 0 | 0 |
| (B) Process operation modified where any problems indicated by monitoring? | 0 | 5 | 0 | 0 |
| (C) Fully documented and adhered to maintenance/ service plan in place in line with the permit? | 0 | 5 | 0 | 0 |
| (D) Full documented records as required in permit available on-site? | 0 | 5 | 0 | 0 |
| (E) All relevant documents forwarded to the authority by date required? | -5 | 10 | 0 | 0 |
| | | | Total: | 0 |

These aspects relate to the operator's performance within the twelve months immediately preceding the assessment or review of the assessment. Failure to monitor to the degree required or to forward documents on time more than twelve months ago should be excluded.

3 - Assessment of Management, Training and Responsibility

Scoring for Assessment of Management, Training and Responsibility

| Criterian | | Possible Sco | | Score |
|--|-----|--------------|--------|---------|
| Criterion | Yes | No | N/A | Awarded |
| (A) Are all operating staff aware of where the operating manual for each dry cleaning machine can be found and do they have ready access to it? | 0 | 5 | 0 | 0 |
| (B) Are nominated trained members of staff exclusively permitted to operate the machines | 0 | 5 | 0 | 0 |
| (C) Are all operating staff trained in the operation of each dry-cleaning machine and the control and use of dry cleaning solvents? | 0 | 5 | 0 | 0 |
| (D) Are records kept of training received by operating staff? | 0 | 5 | 0 | 5 |
| (E) Are suitably trained or experienced staff on site while machines are operating? | 0 | 5 | 0 | 0 |
| (F) Is an 'appropriate' environmental management system in place and working effectively? | -5 | 0 | 0 | 0 |
| | | | Total: | 5 |

4 - Determination of Regulatory Effort from Scores

| A | Actual score = 15 | Score band = 0 to 25 | Category = Low |
|---|--------------------------|----------------------|-----------------------|
|---|--------------------------|----------------------|-----------------------|

Mr T Ahmet Harlow Dry Cleaners 14 The Stow Harlow Essex CM20 3AH

Environmental Health

Harlow Council Civic Centre

The Water Gardens Harlow Essex CM20 1WG www.harlow.gov.uk

Our Ref: 11/DT/01899 Your Ref: Date: 16th November 2015

The Environmental Permitting Regulations 2010 Harlow Dry Cleaners

Dear Sir

As part of our inspection programme I wish to confirm my visit of the 12th November 2015, to the above premises.

I can confirm that comprehensive weekly records are being maintained and I am pleased to confirm that the annual solvent emitted per Kg of work processed is 16.31g; this limit currently complies with the regulations.

Although you have a great deal of experience in the dry cleaning industry I would like to draw to your attention Condition 8 of the above permit as shown below;

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.

The following steps must be taken to ensure your business complies fully with the above regulations;

1. Organise a customised training program for the dry cleaning system including machine operation and solvent use for all dry cleaning staff. Please keep a list of all staff and the training undertaken.

Please find enclosed a short report for your records.

I would like to take this opportunity to thank you for your assistance during the inspection.

Thank you for in anticipation of your co-operation, please do not hesitate to contact me should you wish to discuss this matter further.

Yours faithfully

Steven Adams

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