Comment No.	Chapter No. / section No. (if available)						Chapter title	Page # (in pdf version)	BAT #	Comment description	Rationale	Proposed amendment
1							General		**10, 12**	The Concluding remarks and recommendations for future work of the TAN BREF reflect well that there was a severe lack of information and data of good quality during the revision process of this BREF. It must be doubted in many cases (water emissions, VOC emissions etc.), whether for the derivation of BAT-AELs information and data on best available techniques served as a basis. These severe limitations of information provided during the data collection phase restrict the potential of the BAT Conclusions. However, we acknowledge the efforts made at the final TWG meeting to develop sound BAT Conclusions comprising BAT-AELs, especially for the discharges of waste water. We would like to thank the EIPPCB for the reflection of the result of the TWG in February 2012 in the BAT Conclusions TAN. From our point of view significant improvements have been achieved compared to the initial draft BAT Conclusions of the TAN BREF. Issues to be solved refer to time reference of BAT-AELs for discharges of waste water, respectively clear definitions of sampling methods or time references for BAT-AELs.		Modify the heading of tables 5.3 and 5.4 as follows "(*Monthly average values based on the average of the 24-hour representative composite samples taken over a month*)"
2	4	2		3				122		The content of this section is limited to the description of the substitution (or optimisation) of fluorcarbon resins. Therefore we would suggest to replace "Halogenated organic compounds" by "fluorcarbon resins".	Clarification. Presentation of precise and correct information. Within the EU the use of products containing PFOS is restricted. Therefore the substitution or optimisation of fluorcarbon resins is of high concern for the industry. Replacing "halogenated organic compounds" by "fluorcarbon resins" would reflect the aim of this section much better and would facilitate finding the text dealing with this matter.	Replace "halogenated organic compounds" in the title and in the description by "fluorcarbon resins".
3	4	2		3				122		The first sentence of the technical description ("Like fatliquors these agents…") is not related to the substition/optimisation of fluorcarbon resins.	Clarification. Presentation of precise and correct information. See also comment description	Delete the first sentence of the technical description.
4	4	2		3				122		Fluorcarbon resins should be used which do not contain PFOA and PFOS. Therefore "Organic solvents" should be replaced by "PFOS and PFOA". Furthermore for the minimisation of emissions of halogenated organic compounds it is important to retain the segregated liquors containing fluorcarbon resins.	Clarification. Presentation of precise and correct information. See comment description	Change the first sentence under the heading "Environmental performance and operational data" as follows: "The available water-repellent agents which do not contain PFOS and PFOA and the retention of segregated liquors minimise the emission of organo-halogenated contaminants."
5	4	9		1				187		Nitrogen removal is performed in three main steps: ammonification, nitrification and denitrification. Therefore the second and third sentence of the technical description has to be amended.	Clarification. Presentation of precise and correct information.	Amend the second and third sentence of the technical description as follows: "Nitrogen removal is a biological process performed in three main steps: ammonification, nitrification and denitrification. In the first biological process the proteins are ammonificated to ammoniacal nitrogen."
6	5	5						234	**10 , 12**	Table 5.3 gives BAT-AELs for direct discharges of waste water after treatment as monthly average values. This is inconsistent with the monitoring provisions foreseen in section 5.2, where provisions are defined for relevant process parameters COD, BOD_5, suspended solids, ammoniacal nitrogen and total Cr (for monitoring of sulphide emissions no provisions are given). For monitoring of the total chromium concentration, COD, BOD and ammoniacal nitrogen, flow-proportional 24-hour composite samples shall be used. The frequency of monitoring is quoted on a weekly or monthly basis. This is a much more usable definition than a monthly average. This monitoring specification shall also apply for sulphide emissions. Therefore, in table 5.3 BAT-AELs on the basis of flow-proportional 24-hour composite samples have to be added for the respective parameters. Table 5.4 gives BAT-AELs for total Cr and sulphide emissions through indirect discharges of waste water from tanneries into urban waste water treatment plants as monthly average values. This is inconsistent with the monitoring provisions foreseen in section 5.2, where provisions are defined for relevant process parameters COD, BOD5, suspended solids, ammoniacal nitrogen and total chromium (for monitoring of sulphide emissions no provisions are given). For monitoring of the total chromium concentration flow-proportional 24-hour composite samples shall be used. The frequency of monitoring shall be on a weekly or monthly basis. This is a much more usable definition than a monthly average. This monitoring specification shall also apply for sulphide emissions. Therefore, in table 5.4 BAT-AELs on the basis of flow-proportional 24-hour composite samples have to be added for the respective parameters. The BAT-AELs of BAT #10 and #11 in table 5.3 are expressed as monthly average without additional explanations concerning frequency of measurement. This may lead to non-comparable practices and reported values in Europe. We would suggest a frequency of measurement of 1 or 2 times a week. If this is not possible any more, at least a definition should be added (even though with a different definition as proposed). Concerns about some of the averaging that appears to have been made to data. Several of the tables in the BREF and the BAT conclusions have 'monthly averages' in a separate row at the bottom of the table, or, as in the new Table 4.16, 'yearly averages calculated from monthly averages' but there appears to be no explanation as to how these monthly averages have been derived. The use of such data is supported only when it is based on a months worth of 24-hour flow proportional composite samples. Otherwise it is merely an average of some samples taken within that month. No support for the proposal for a definition to read 'monthly average values to be based on a defined number of 24-hour representative composite samples… the minimum frequency of the measurements of the relevant parameters is once a week' as this does not produce a monthly average, but rather an average of the discrete samples taken in the period.	Enhance clarity, consistency and usability of the BAT Conclusions. Enhance consistency between the Brefs as one tool for IED implementation, where the same issues shall be treated in the same way - and different issues different. The term "monthly average value" is not defined. The so far reviewed BREFs (GLS, I&S) provide BAT-AELs for waste water emissions, based on a qualified random sample or a 24-hour composite sample. The above mentioned BREFs give also clear definitions for sampling and analyzing water and waste water (— a random sample which refers to a single sample taken from a waste water flow; — a composite sample, which refers to a sample taken continuously over a given period, or a sample consisting of several samples taken either continuously or discontinuously over a given period and blended; — a qualified random sample shall refer to a composite sample of at least five random samples taken over a maximum period of two hours at intervals of no less than two minutes, and blended. Monitoring should be done according to the relevant EN or ISO standards. If EN or ISO standards are not available, national or other international standards should be used that ensure the provision of data of an equivalent scientific quality.) This level of quality is needed for all BREFs under revision. Clarification. Alternatively, the minimum quality criteria of the averaging period of the given BAT-AEL is to provide a clear definition of monthly average of whatever type in order to avoid misinterpretaton and different understanding and implementation of this BAT and its BAT-AELs.	Modify the heading of tables 5.3 and 5.4 as follows "(*Monthly average values based on the average of the 24-hour representative composite samples taken over a month*)"
7	5	6						239	**19**	Regarding table 5.5 of section 5.6.2 *Volatile organic compounds* it must be doubted, whether for the derivation of BAT-associated solvent use levels data and information based on BAT served as a basis, since the upper values correspond to the total emission limit values given in Directive 1999/13/EC on Solvent Emissions (now Chapter V of Directive 2010/75/EU). Table 5.5 gives a BAT-AEL range for VOC emissions per unit of finished leather [g/m²], where an extraction ventilation and abatement system is used as an alternative to the use of water-borne finishing materials. The BAT-AEL for VOC emissions given as concentration value is missing.	BAT AELs shall be based on applied BAT and not on upper ELVs from an exisiting European Directive. Emission data in concentration units must be available as they are necessary to calculate VOC emissions per unit of finished leather. Emission data in concentration give a much better picture of the environmental performance and allow cross sector comparison.	at p. 261 modify: "Concerning water emissions and solvent use/VOC emissions to air there was a general scarcity of data that were at once: ..."