OPINION OF THE FORUM FOR THE EXCHANGE OF INFORMATION PURSUANT TO ARTICLE 13 OF THE DIRECTIVE 2010/75/EU ON INDUSTRIAL EMISSIONS (IED ARTICLE 13 FORUM)

concerning the Draft Best Available Techniques (BAT) Reference document for Waste treatment

Meeting of 19-20 December 2017

1. BACKGROUND

Article 13(1) of Directive 2010/75/EU on industrial emissions[1] (the Directive) requires the Commission to organise an exchange of information between Member States, the industries concerned, non-governmental organisations promoting environmental protection and the Commission.

Article 13(3) of the Directive requires the Commission to establish and regularly convene a forum composed of representatives of Member States, the industries concerned and non-governmental organisations promoting environmental protection and to obtain the opinion of the forum on the practical arrangements for the exchange of information foreseen under that Article. In accordance with Article 13(3) of the Directive, the guidance referred to in points (c) and (d) of the second subparagraph of that Article shall take account of the opinion of the forum and shall be adopted in accordance with the regulatory procedure referred to in Article 75(2).

Commission Decision 2011/C 146/03[2] established the forum for the exchange of information pursuant to Article 13 of the Directive (the forum). In accordance with Article 3 of this Decision, the forum may be consulted on any matter relating to Article 13 of the Directive or on any matter relating to BAT as defined in Article 3(10) of the Directive.

2. OPINION OF THE FORUM

In accordance with Article 13(3) of the Directive the forum hereby gives its opinion on the draft Best Available Techniques (BAT) reference document for Waste Treatment as presented at the meeting of the forum of 19-20 December 2017.
https://circabc.europa.eu/sd/a/b3b7b790-fff5-4fd3-9c0f-e039cfceee77/WT_Final_Draft.pdf

[1] OJ L 334, 17.12.2010, p. 17–119, Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control), Text with EEA relevance,

[2] OJ C 146, 17.5.2011, Commission Decision of 16 May 2011 establishing a forum for the exchange of information pursuant to Article 13 of the Directive 2010/75/EU on industrial emissions

(1) The forum welcomes the draft Best Available Techniques (BAT) reference document for Waste Treatment as presented by the Commission.

(2) The forum acknowledges the discussions held at its meeting of 19-20 December 2017 and agrees that the changes to the draft Best Available Techniques (BAT) reference document for Waste Treatment, as proposed in Annex A, should be included in the final document.

(3) The forum reaffirms the comments in Annex B as representing the views of certain members of the forum but, on which, no consensus exists within the forum to include them in the final document.

Brussels, 20 December 2017

Annex A: Comments on the draft Best Available Techniques (BAT) reference document for Waste Treatment that are consensual within the forum.

Annex B: Comments on the draft Best Available Techniques (BAT) reference document for Waste Treatment that are representing the view of certain members of the forum.

3. ANNEX A: COMMENTS ON THE DRAFT BEST AVAILABLE TECHNIQUES (BAT) REFERENCE DOCUMENT FOR WASTE TREATMENT THAT ARE CONSENSUAL WITHIN THE FORUM

No	Chapter	Comment description	Proposal for modification	Rationale
1	Scope	Typo	Change "… any waste term Also, some…" to "…any waste term. Also, some…."	Typo
2	1.1	To add the source of the figure	Indicate European Commission as a source for Figure 1.1	Typo
3	1.2	Typo	Reduce the line spacing in the sentence "In order to give a snapshot of the waste situation in Europe, the following tables (Table 1.2 and Table 1.3) show the amount of waste generated in the EU-28 and Norway"	Typo
4	1.2	An update of data used	To update Table 1.3 using the up-to-date waste statistics	Ensure an access to the most recent data
5	1.2	Source of information	To amend the source of Table 1.3 on ": Source: Eurostat"as the data from the reference [186,COM 2016] originated from EUROSTAT"	Provide a more adequate reference to data source
6	1.2	update of the data used	To update Table 1.4 using the up-to-date waste statistics	Ensure an access to the most recent data

No	Chapter	Comment description	Proposal for modification	Rationale
7	1.2.2	Typo	Add a space between number and the unit and change "17 000km" to "17 000 km"	Typo
8	1.2.2	update of the data used	To update Table 1.5 using the up-to-date waste statistics	Ensure an access to the most recent data
9	1.2.3	update of the data used	To update Table 1.6 using the up-to-date waste statistics	Ensure an access to the most recent data
10	1.2.11.2	Typo	Reduce the line spacing in the sentence "As for hazardous mineral construction and demolition wastes (except waste containing asbestos), Table 1.19 shows the amount generated in the EU-28 in 2012"	Typo
11	2.3.2.6	Typo	Change the word "destoyed" into "destroyed" in a blue box of Figure 2.22.	Typo
12	2.3.6.2.5.1	Typo	To add description or remove the yellow lines on the left side of the figure 2.34	Typo

No	Chapter	Comment description	Proposal for modification	Rationale
13	4.4.1.1.2	Not precise enough description of the outputs stream from the technique called "Separation of biodegradable material by enzyme treatment"	Replace the second bullet point in the "Output description" reading "Recyclable material (metal, inert/inactive material such as gravel, plastics, digester with fertiliser qualities) " with "Recyclable material (metal, inert/inactive material such as gravel, plastics, treated organic fraction)" or delete the words "digester with fertiliser qualities".	The organic fraction deriving from an MBT process does not necessarily meet the quality requirements needed for a safe use as a fertiliser.
14	5.1.3.2	Improve consistency between tables	Include the references in table 5.2 to plants indicated in Table 5.3	The information on the archived emission levels and applied abatement techniques shall be based on a consistent set of reference plants
15	5.2.1	Complement a description of the "cleaning" operation in re-refining of waste oil	Add "solvent extraction" as one of the operations used for cleaning of waste oil	Installation using solvent extraction were among the reference plants participating in the data collection
16	5.2.1	Unneeded cross-references	To remove cross-references from the row describing propane deasphalting and hydrofinishing in Table 5.9	The references to the ex-sections have no added value in the final version of the BREF
17	5.2.1	Revision of data in table 5.9 on waste oil re-refining technologies/processes	Add information on 'usual plant capacity' of 80 kt/year for "Propane deasphalting and hydrofinishing"	Information regarding this parameter is available in reports from the reference plants

No	Chapter	Comment description	Proposal for modification	Rationale
18	5.2.1	Revision of data in table 5.9 on waste oil re-refining technologies/processes	Change data on 'usual plant capacity' for Thermal deasphalting process (TDA) on 40–100 kt/year in point (a) and 100–180 kt/year in point (b)	Consistency with data provided during data collection
19	5.2.1	Revision of data in table 5.9 on waste oil re-refining technologies/processes	Add following information on "Feed and output streams" for thermal deasphalting process (TDA): "INPUT: waste oil" "OUTPUT: base oil (API Group II), gasoil, asphalt"	Information regarding this parameters is available in reports from the reference plants
20	5.2.1	Revision of data in table 5.9 on waste oil re-refining technologies/processes	Add the following information on a new combined technique TDA/Hydrofinishing : Column 'Feed and output streams': INPUT: waste oil OUTPUT: base oil (API Group II), gasoil, asphalt Column 'Pretreatment': Preflash via vacuum stripping and chemical caustic treatment Column 'Cleaning': Gravimetric decanting and centrifugation. Column 'Fractionation': High vacuum distillation by Thermal DeAsphalting (TDA) Column 'Finishing': High pressure catalytic hydrotreatment through 2 steps: demetallization,	Information regarding this technique and associated parameters is available in reports from the reference plants

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			hydrosaturation and hydrodesulphurization reactions. Column 'Yield': 65-70% on dry basis Column 'Usual Plant Capacity': 100kt/year	
21	5.2.1	Revision of data in table 5.15 on product issues related to different waste oil re-refining technologies/processes	Add the following information on 'Main products' for 'TDA + hydrofinishing (high pressure)': Gas oil (desulphurised): 70 Desulphurised VGO:70 Bitumen: 120	Information regarding these parameters is available in reports from the reference plants
22	5.2.2.1.2	Revision of data in table 5.22 regarding the origin of emissions to water and associated abatement techniques	Include additional row in Table 5.22 to present data form plant #620	Supplement presented information using data gathered during data collection
23	6.1.1	Support the point XI of BAT 1	Support the BAT 1point XI "an inventory of waste water and waste gas streams"	Clarification of BAT 1 and improved consistency with BAT 3
24	6.1.1	Complement BAT 3	Add to BAT 3 (ii) (c) "the activated sludge inhibition test"	Ensure consistency with BAT 52.
25	6.1.2	Consistency of the abbreviations used	Change TN into „Total N”	For consistency reasons since the abbreviation "Total N" is used in the "Definitions
26	6.1.2	Consistency of the abbreviations used	Change TP into „Total P”	For consistency reasons since the abbreviation "Total P" is

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				used in the "Definitions"
27	6.1.2	The "differential optical absorption" described in the BAT 9 (a) is a different technique as described in Section 6.6.2.	Delete "optical" in the description of technique (a) "Sniffing methods, optical gas imaging, solar occultation flux or differential absorption. See descriptions in Section 6.6.2. "	Differential absorption LIDAR (DIAL) defined in the 6.6.2 is a laser-based technique while the “differential optical absorption spectroscopy (DOAS)” can use different light sources
28	6.1.3	Typo	Change the word "piercing piers" to "piercing-pliers" in the description of BAT 14 (b): appropriate service hoses' access ports, piercing piers piercing-pliers, drill heads, e.g. when degassing WEEE containing VFCs and/or VHCs	Typo
29	6.1.5	BAT 19 (i) "Buffer storage capacity" is not in line with the technique description	Change to "Appropriate buffer storage capacity"	Consistency with the technique description
30	6.1.5	To change the wording of footnote 3 and 6 in Table 6.1	To change footnotes 3 and 6 footnote 3, last bullet point reads: "in the case of high chloride concentrations (e.g. above 5 g/l)" footnote 6 reads: "(…) in the case of high chloride concentrations (e.g. above 10 g/l in the waste input)"	To improve clarity and consistency with the footnote 5

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31	6.1.5	Amend the wording of footnote 7 in Table 6.1	Delete the sentence "When nitric acid is the main waste input, this BAT-AEL does not apply provided that the abatement efficiency is > 90 % as a daily average" in footnote 7 of table 6.1	Consistency with the decision taken during final TWG meeting
32	6.1.8	Typo	Change the word "palettes" to "pallets"	Typo
33	6.	To clarify that the BAT-AEL for emissions to air is expressed as a daily average when continuous monitoring is applied	Adjust the table in the section "General considerations": "emission levels associated with the best available techniques (BAT-AELs) for emissions to air" by adding a new column "type of measurement" before the column "averaging period". Add that for continuous measurements: daily average is applied and that for periodic measurements: average over the sampling period is applied. Include the terms "continuous measurement" and "periodic measurement" in the list of definitions	To improve clarity and consistency with other BREFs
34	6.2.3.2	The unit for hydrocarbon concentration in the description of technique BAT 30 (b) is not accurate.	Change "< 25 %" to "< 25 vol-%"	To be clear that the concentration is not on a mass basis
35	6.4.6.1	The description of technique (a) in BAT 48 is not accurate enough.	Change the "carbon" to "spent activated carbon"	The word "carbon" alone is not accurate enough.

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36	8	In Table 8.2 'Split views expressed', references to BAT (conclusion) should be adjusted according to the new renumbering adopted in the BAT Conclusions of the Final Draft.	- reference to 'BAT 15' should be replaced by 'BAT 20'; - reference to 'Tables 6.3 and 6.4' should be replaced by 'Tables 6.1 and 6.2'; - reference to 'BAT 32' and 'BAT 10d' should be replaced by 'BAT 34' and 'BAT 14d'; - reference to 'Table 6.8' should be replaced by 'Table 6.7'.	Consistency with the renumbering adopted in the Final Draft
37	8	Split view	To include in Chapter 8 of the WT BREF a split view raised by FR and EFR on the he upper end of the range of the BAT-AEL for channelled dust emissions to air from the mechanical treatment of waste when the fabric filter is not applicable, given in the BAT 25.	There is evidence in collected data showing 17 plants applying BAT with emission levels above 10 mg/Nm3
	8	Split view	Add the split view of Belgium on additional BAT 26bis regarding the prevention and reduction of diffuse emissions of mechanical treatment in shredders of metal waste in Table 8.2.	The split view could not be tabled during the Final Meeting for practical reasons because the related issue was not discussed due to time constraints .

4. ANNEX B: COMMENTS ON THE DRAFT BEST AVAILABLE TECHNIQUES (BAT) REFERENCE DOCUMENT FOR WASTE TREATMENT THAT ARE REPRESENTING THE VIEW OF CERTAIN MEMBERS OF THE FORUM

No	From	Chapter	Comment description	Proposal for modification	Rationale
1	Hungary	1.1	In many cases, these types of materials (both secondary products and residues) cannot be reused by other means and may become not marketable	There is a need to disseminate industrial symbiosis, the aim is to take these residues, by-products back into the economic cycle.	-
2	Hungary	2.2.2.1	Figure 2.2: Dust emissions to air from all waste treatment plants (periodic measurements)	It is difficult to interpret the figure, because of too many data	Improve readability of the chart
3	Hungary	2.3.1.1	To add a source of the figure	Indicate a source of figure 2.21	Provide reference to the source of the figure

No	From	Chapter	Comment description	Proposal for modification	Rationale
4	Poland	4.4.1	The requirements for stabilization to be added in section 4.4.1.	Add the following text to the section 4.4.1 "The purpose of the biological treatment of biodegradable fraction contained in the mixed municipal waste is the fastest possible stabilization. The process should be performed so that the emissions produced by the decomposition of the organic fraction - methane and odours will be minimized when landfilling. Biological treatment reduces the amount of greenhouse gas emitted from landfills and risk of contaminated leachate. The reduction of weight and volume of the treated waste is also the result of this process. It is very important to determine endpoints for the process of mechanical and biological treatment by optimizing the decomposition level of organic substances. The best way to establish completion of the biological decomposition is to check parameter AT4 <10 mg O2 / g dry weight responsible for determining the ability of treated waste for further biological decomposition, in conjunction with the loss on ignition <35% and the organic carbon content of <20% by dry weight. Waste that do not meet the above requirements, will continue its biodegradation in the landfill, causing further emission to the atmosphere of methane malodorous substances, leachate and landfill instability."	To provide within WT BREF at least information on the necessity of the optimization of the decomposition level of organic substances in MBT

No	From	Chapter	Comment description	Proposal for modification	Rationale
5	Poland	4.4.1	Adapt the description of the Mechanical Biological Treatment of waste	To remove "autoclaving" from the section 4.4.1.	Autoclaving is a pure physical process, not biological. Such installation will not be able to fulfil BAT AELs foreseen for biological treatment.
6	Belgium	6.1.1	The monitoring of acute toxicity	Add a monitoring requirement for acute toxicity test in BAT 3 (monitoring requirements)	In a view of the lack of data on the acute toxicity in waste water there is a need to collect data for the next BREF review. A recommendation on monitoring (given in Chapter 8) does not guarantee that MS will have comparable data on toxicity for the next BREF review. An extra argument is that other sectors with complex effluents (chemical sector under the BREF CWW) do have this monitoring requirement
7	Denmark	6.1.2	To change the header of the BAT 10	Reintroduce a reference to the "relevant sources" and amend the header as follows: "BAT is to periodically monitor odour emissions from relevant sources".	The rational for deleting of "from relevant sources" is not clear. The reference to "From relevant sources" concerns point sources or diffuse emissions of odour at the installation and these sources are important assessment parameters for the permit writer. By deleting the text the scope and purpose of BATC 10 is being extended from (only) "relevant sources" to "all sources", which is a major change that the TWG did not have any possibility to discuss. The original text is in better compliance with the national regulation on odour and this has been the basis for the discussions in the TWG. 4) The applicability is related to "receptors", not to be mistaken with "from relevant sources" in the header of the BATC that relates to emission points at the installation.

No	From	Chapter	Comment description	Proposal for modification	Rationale
8	Germany	6.1.2	Wording error	Change the word "invoices" to "devices" in the first sentence of the description: "Monitoring includes direct measurements, calculation or recording, e.g. using suitable meters or invoices devices."	The term "invoices" is probably wrong in the technique description

No	From	Chapter	Comment description	Proposal for modification	Rationale
9	Austria	6	The link between BAT and upper and lower AEL for water.	The link between BAT and upper and lower AEL for water emissions is missing. It is important to achieve the BAT-AEL without dilution and with the appropriate technique depending on the concentration in the water stream (see BAT 20 and Table 6.1 and Table 6.2).	The data provided in Chapter 4 does not allow to derive the BAT-AELs for water emissions as done in Chapter 6. The data of Chapter 4 does not draw a clear distinction between data of water from the waste treatment processes and data from other water to be discharged (e.g. rainwater) and their mixture. This leads to very low emission concentrations in the data-set, which must not be interpreted as being caused by the best available technique but being caused by dilution with water containing very low concentrations of substances. Since dilution is not considered a technique to reduce emissions, these data have to be excluded from the consideration of BAT. Total loads of metals in the water stream have to be reduced without dilution. For interpretation of concentrations of substances in the waste water of the waste treatment process it is crucial to know the content of each substance in the treated waste. If e.g. a metal is not contained in a treated waste, the resulting waste water concentration of this metal will be very low, maybe even close to background concentrations in the environment. In such a case the resulting waste water concentration after treatment will not reflect the result of a combination of best available techniques but reflect the absence of this substance in the treated waste. Footnote 8 in Table 6.1 and Footnote 3 in Table 6.2 is taking up that thought, but in a legally not applicable manner. During licencing and supervising a plant the knowledge of all the possible compositions of treated waste cannot be known at any given time, thus the footnote cannot be used sense-fully

No	From	Chapter	Comment description	Proposal for modification	Rationale
10	EEB	6.1.5	Delete footnote 2 in Table 6.2 "The BAT-AELs may not apply if the downstream waste water treatment plant abates the pollutants concerned, provided this does not lead to a higher level of pollution in the environment."	Delete footnote 2 or at least modify as follows: "The lower range of the BAT-AELs may not apply if the downstream waste water treatment plant abates the pollutants concerned, provided this does not lead to a higher level of pollution in the environment."	The footnote is not in line with the principles of the EU Water Framework Directive: abatement at source, polluters pays principle, no dilution of hazardous substances, equivalent level of protection. A downstream (biological) WWTP does not guarantee an equivalent level of protection for many critical pollutants e.g. for toxic heavy metals: the removal efficiency is lower than in case of a physico-chemical treatment, there is dilution and, often, it is not the polluter who pays. During the FM there was a long debate on this topic with many stakeholders also raising the issue of effective enforcement of the BAT conclusion – the wording of the footnote is weak, it leaves room for misinterpretation and abuse and it undermines the purpose of introducing requirements for indirect discharges in the first place

No	From	Chapter	Comment description	Proposal for modification	Rationale
11	Denmark, Germany, EEB	6.2.1.1, 6.3.1.2, 6.2.4, 6.2.5.1, 6.3.1.2, 6.4.1.2, 6.4.5, 6.5.2	Clarification of the text by the application of footnotes explaining the applicable averaging period for the BAT AELs related to emissions to air when the continuous monitoring is used.	Add to the relevant footnotes the following text already applied in the pre-final draft: "When continuous monitoring is applied the BAT-AEL is expressed as daily average". This includes to keep footnote 1 in BAT 25/table 6.3; to keep footnote 1 in BAT32/table 6.6; to keep footnote 1 in BAT29/table 6.4; to keep footnote 1 in BAT31/table 6.5; to keep footnote 1 in BAT34/table 6.7; to keep footnote 1 in BAT41/table 6.8; to keep footnote 2 in BAT 47/table 6.9; to keep footnote 2 in BAT53/table 6.10.	1) Some installations in the WT BREF has provided data from continuous monitoring and these installations should be able to prove their compliance with BAT-AELs by using continuous monitoring. 2) Continuous measurement has an advantage over periodic measurement as it provides a larger amount of data that can facilitate statistical analysis and can highlight periods of different operating conditions. 3) The BAT-AEL expressed as daily average is not necessarily equivalent to a BAT-AEL expressed as average over the sampling period. Normally periodic measurements in a stack would show higher emission concentrations compared to continuous measurement in the same stack on a daily average value. This is due to a higher number of samples in the continuous monitoring regime that are being averaged to e.g. daily average values. 4) The footnote would not pose any problem to the installations to comply with the BAT-AEL on a daily average level. Keeping the footnotes does not prescribe to use continuous monitoring. The use of either periodic or continuous monitoring should be a matter of discussion between an installation and its permitting authority, as long as compliance to the BAT-AEL is possible.

No	From	Chapter	Comment description	Proposal for modification	Rationale
12	EEB	6.2.2.1	Add a new BAT on mechanical treatment of waste	Add the new BAT 26bis addressing the reduction plan for diffuse emissions form shredders. "In order to prevent diffuse emissions BAT is to apply all the techniques mentioned in BAT 10g1 (as proposed above) and mentioned below: Set up and implement a diffuse emission reduction program designed to identify the sources of diffuse emissions (e.g. potential leaks of shredders, conveyor belts, transfer points, drop heights,) to estimate the contribution of the sources and to implement prevention and/or reduction measures."	There was no information provided on monitoring of diffuse emissions (in the questionnaires)' most probably because direct monitoring of diffuse emissions is normally not practicable due to a lack of monitoring methods. Indirect methods are applied instead, like monitoring of dust deposition including heavy metals and organic pollutions in the dust, bio-monitoring, e.g. in grass samples. In any case, the information provided by Germany, Belgium and EEB is enough to prove that shredding plants cause high diffuse dust, PCB and heavy metals emissions; The main added value of BAT 26bis in comparison to BAT 26 is that the focus is on the prevention and/or reduction of diffuse emissions at source, through measures targeting the sources estimated to have the main contribution. Before taking measures to reduce dust emissions the main sources have to be detected and the emissions have to be estimated. This first step is absolutely crucial but unfortunately not part of the current BAT conclusions.
13	Austria	6.2.4.1	Delete BAT-AEL for TVOC in BAT31 (Table 6.5)	Delete BAT 31or increase the upper end of the BAT AEL up to 50 mg/Nm3 - for low VOC loads (as already defined in BREF 2006). Also delete the entry from BAT8.	The reduction of emissions to air of organic compounds is not BAT for the mechanical treatment of waste with calorific value applied in Austria. The data basis provided in Figure 3.35 of page 322 of the BREF is not sufficient for the determination of a BAT AEL for TVOC. Techniques, which are applied in only one plant, single measurements, differing measurement conditions to the conditions set in the BAT conclusions cannot be the only basis for the determination of a BAT AEL.

No	From	Chapter	Comment description	Proposal for modification	Rationale
14	Austria	6.3.1.2	Change BAT AEL on TVOC for MBT in BAT34 (Table 6.7)	Change BAT-AEL for MBT on TVOC to the range 5-50 mg/m3 (see BAT41 in BREF 2006)	This BAT-AEL range on TVOC is too low and can only be guaranteed by using thermal oxidation of exhaust air. Concentration range is set by data of Figure 4.9 on page 393 covering most prominent plants from Germany, many of them using RTO for exhaust air treatment. One of the plants from Figure 4.9 on page 393 not using thermal oxidiser shows also concentrations higher than 40 mg/m3
15	Italy	6.3.1.2	BAT 34, the introductory statement should be amended in order to encompass a direct reference to BAT 14d, particularly relevant for addressing odour emissions resulting from intensive decomposition of highly putrescible waste as well as MBT installations	In BAT 34, the introductory statement should be amended as follows: "In order to reduce channelled emissions to air of dust, organic compounds and odorous compounds, including H_2S and NH_3, BAT is to apply BAT 14d and to use one or a combination of the techniques given below"	The BAT14d 'Containment, collection and treatment of diffuse emissions' is considered to be the most effective solution to reduce odour emissions from the intensive decomposition (active composting time) of highly putrescible waste, based on the operational experiences permitted at national level.

No	From	Chapter	Comment description	Proposal for modification	Rationale
16	Poland	6.3.4	The requirements for stabilization should be added in Section 6.3.4 (BAT conclusions for the mechanical biological treatment (MBT) of waste)	Add the following requirements for waste after the mechanical biological treatment (stabilizat): parameter AT4 <10 mg O2 / g dry weight responsible for determining the ability of treated waste for further biological decomposition, in conjunction with the loss on ignition <35% and the organic carbon content of <20% by dry weight	The purpose of the biological treatment of biodegradable fraction contained in the mixed municipal waste is the fastest possible stabilization. The process should be performed so that the emissions produced by the decomposition of the organic fraction - methane and odours will be minimized when landfilling. Biological treatment reduces the amount of greenhouse gas emitted from landfills and risk of contaminated leachate. The reduction of weight and volume of the treated waste is also the result of this process. It is very important to determine endpoints for the process of mechanical and biological treatment by optimizing the decomposition level of organic substances
17	EEB	6.4.8	Add an amendment to BAT 51 based on monitoring safeguards for decontamination of equipment containing PCB	Add the following techniques into BAT 51: • PCB monitoring in air exhaust • Atmospheric deposition (e.g. lichen, Owen) • PCBs monitoring in neighbouring agriculture production (e.g. in milk, cereals) • Daily PCBs, TCBs monitoring in water exhaust; • Groundwater monitoring (PCBs, TCBs); • Biological monitoring in the water exhaust receptor (fish, mold…); • Operators blood PCBs monitoring (2 years frequency).	The BAT 51 is addressing the crucial issue of monitoring safeguards for proper decontamination of equipment containing PCBs. The supplement proposed will make a difference as monitoring is not adequately covered in current BAT 51

No	From	Chapter	Comment description	Proposal for modification	Rationale
18	France	8	Split view	To include in the Chapter 8 of the WT BREF the split view concerning the deletion of the Table 6.2 with "BAT-AELs for indirect discharges to a receiving water body."	Only some pollutants or parameters are concerned, but not all the pollutants/parameters for which a BAT-AEL has been settled up for direct discharges. Total organic carbon, chemical oxygen demand, total suspended solids, for example, do not have BAT-AEL for indirect discharges. Other pollutants/parameters have the same BAT-AELs as for direct discharges. The national authorities consider it is not in line with the article 15 of the directive IED. Indeed, 2nd paragraph of article 15.1 of the IED directive provides that: "With regard to indirect releases of polluting substances into water, the effect of a water treatment plant may be taken into account when determining the emission limit values of the installation concerned, provided that an equivalent level of protection of the environment as a whole is guaranteed and provided this does not lead to higher levels of pollution in the environment". The national authorities think that some permit writers may not check the capacity of the downstream WWTP and may not see the need to set any emission limit values for indirect discharges as long as the waste water is sent to a downstream WWTP, because the WT BREF provides BAT-AELs for indirect discharges and only for some pollutants/parameters. The mechanism provided by the article 15.1 above may not be implemented at all since the reference will be the table 6.2 of the BAT conclusions. The actual redaction is not satisfactory, because it prejudices the capacity of the downstream WWTP to properly treat pollutants/parameters for which there are no BAT-AELs. Table 6.2 should therefore be deleted..