

Annex A - Comments on the draft CLM BREF that are consensual within the forum

Overall comment No	Chapter No. / section No. (if available)						Chapter title (only if there is no section or chapter No.)	BAT # (if applicable)	Page # (PDF version)	Comment description	Rationale	Proposed amendment
1								0	<p>The date on the cover page will probably be 2013 (current draft is dated June 2012) while the content of the brief was concluded in September 2008 and adopted in May 2010. It is not correct to put a new date on a brief that has not been reviewed, updated or changed.</p> <p>It should be clearly indicated on the cover page that the BREF was concluded 2008 and that the BAT conclusions were adopted to the IED Directive in 2013 (2012).</p> <p>Add accurate information on when the BAT conclusions were derived to secure the credibility of the BREF documents.</p>	<p>If the BREF and BAT conclusions are dated 2013 (2012) it could be misunderstood as that it is a new updated BREF.</p> <p>The directions for the TWG meeting in May 2012, was to transform the BAT sections in the existing BREF to BAT conclusions according to IED, and not to reopen any technical discussions that took place at the final TWG meeting in 2008. Therefore it was not possible to add/include information not already part of the BREF note in 2010.</p> <p>The age of the data is important information for the permit writer, when setting directions for the industry.</p>	<p>Add a paragraph with information on the review and transformation process of the CLM BREF in the Preface in order to clarify the CLM BREF specificities:</p> <p>"The review process of the CLM BREF started in 2005 under the framework of the IPPC Directive 2008/1/EC, with the final TWG meeting, where the BAT conclusions and BAT-AELs were agreed, being held in September 2008. The CLM BREF was adopted by the European Commission and published in 2010 under the framework of the IPPC Directive.</p> <p>In February 2012, the European Commission decided to proceed with the transformation of the CLM BREF into a document, for which the BAT conclusions can be used for implementing the IED (Directive 2010/75/EU). Draft BAT conclusions were issued for consultation with the TWG in February 2012. A TWG meeting was held in May 2012 in order to discuss the draft BAT conclusions and verify that they accurately reflect the technical content of the conclusions adopted under the IPPC Directive. The process included no new information for the sections on cement or lime production, but took into consideration limited additional information concerning the emissions of sulphur oxides from magnesium oxide production.</p> <p>The current document contains the BAT conclusions transformed for their adoption under Directive 2010/75/EU."</p>	
2	4						Scope	342	<p>Please check if to add a description for dolime: "Calcined and densified dolomite, where calcination and densification take place in two different steps."</p>		<p>Add the following definition for "dolime" for consistency with the definition of "sintered dolime":</p> <p>"A mixture of calcium and magnesium oxides produced by the decarbonation of dolomite (CaCO₃.MgCO₃) with a residual CO₂ content of the product exceeding 0.25 % and the bulk density of the commercial product well below 3.05 g/cm³. The free content as MgO is usually between 25 % and 40%."</p>	
3	4	2	6	1				20	<p>The consequence of referring to BAT 19 is unclear. A changed heading would clarify that the NH₃ emission levels in table 4.3 are only unreacted NH₃ emanating from using NH₃ to control NO_x by using SNCR. For the "<" see above comment number 11. The foot-note will probably give rise to confusion when MS are to implement Art 15.3 of IED. Which levels apply at which initial levels and at which NH₃ slip? What legal consequences does the word "may be even higher" in the foot-note have for Lepol and long rotary kilns?</p>	editorial change	<p>Change the heading of the table 4.3 to: 'BAT-associated emission levels for NH₃-slip in the flue gases from the use of Selective Non-Catalytic Reduction'</p>	
4	4	3	6	2				42	<p>BAT 42: According to the current wording under applicability, fabric filters as well as wet scrubbers are applicable to 'hydrating lime plants' and 'hydration plants' respectively (these are two different names for the same process). However the BAT-AEL for fabric filters is lower than the BAT-AEL for wet scrubbers. As it stands now, it remains unclear on the basis of which criteria the operator and permit writers should reach a decision. BAT conclusions should be put as unambiguous as possible. This can be reached by clarifying the applicability of the mentioned techniques using available text of the BREF main text.</p>	<p>Clarification by using the same wording for the same process in (a) and (b). Clarification of applicability by using text from the BREF.</p> <p>Facilitates a harmonized implementation of BAT in the Member States. The BAT Conclusion should give a clear guidance on BAT for operators and permit writers. The additional text makes it clearer when to apply FF or wet scrubbers respectively. The text was taken from Sections 2.4.5.3.2 and 2.4.5.3.3 of the BREF (see sub-sections regarding 'Applicability' of the mentioned techniques)</p>	<p>Modify the text on applicability of fabric filters listed in BAT conclusion 42:</p> <p>"Generally applicable to milling and grinding plants and subsidiary processes in the lime industry, material transport and storage and loading facilities. The applicability of fabric filters in hydrating lime plants may be limited by the high moisture and low temperature of the flue-gases".</p> <p>Streamline the terminology: use systematically "hydrating lime plants" and not "hydration plants".</p>	
5	5	2						395	<p>Please Include in the Concluding Remarks the need to gather information on sintered dolime and lime production with the use of biomass as fuel (emission and consumption levels)</p>	See slide 41 of the TWG meeting in Seville, May 2012	<p>Include in the Concluding Remarks the need to gather information on sintered dolime and lime production with the use of biomass as fuel (emission and consumption levels)</p>	