

**Annex III: Summary of BREF**

- A. Comparison of the processes at the Installation with the BREF for Waste Treatments Industries (published August 2006);**
- B. Comparison of the processes at the Installation with the BREF for Emissions from storage (published July 2006); and**
- C. Comparison of the processes at Facility with the BREF for Energy efficiency (published February 2009).**

**Section A: Waste Treatment Industries**

**Part 1: Generic BAT**

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply Feb 2015
<b>Environmental management system (EMS)</b>	<p>BAT is to implement and adhere to an Environmental Management System (EMS) that incorporates, as appropriate to individual circumstances, the following features: (see Chapter 4.1.2.8 of BREF)</p> <ul style="list-style-type: none"> <li>• definition of an environmental policy for the installation by top management (commitment of the top management is regarded as a precondition for a successful application of other features of the EMS)</li> <li>• planning and establishing the necessary procedures</li> <li>• implementation of the procedures, paying particular attention to               <ul style="list-style-type: none"> <li>- structure and responsibility</li> <li>- training, awareness and competence</li> <li>- communication</li> <li>- employee involvement</li> <li>- documentation</li> <li>- efficient process control</li> <li>- maintenance programme</li> <li>- emergency preparedness and response</li> <li>- safeguarding compliance with environmental legislation.</li> </ul> </li> <li>• checking performance and taking corrective action, paying particular attention to               <ul style="list-style-type: none"> <li>- monitoring and measurement (see also the Reference document on General Principles of Monitoring)</li> <li>- corrective and preventive action</li> </ul> </li> </ul>	<p>The implementation of an Environmental Management System (EMS) at the facility shall take place once the facility starts operating. The EMS shall incorporate the following elements:</p> <ul style="list-style-type: none"> <li>• Organizational Chart which captures the structure and hierarchy at the facility and any supporting departments</li> <li>• Job Description Register which defines all roles and responsibilities of key personnel</li> <li>• Training Identification, Approval, Execution and Verification (refer to Clause B 2.9)</li> <li>• Communication procedure (internally and externally to third parties)</li> <li>• Records management including approval, retention and backup</li> <li>• Reference to the control checks during operations; necessary to ensure compliancy with environmental legislation</li> <li>• Maintenance Programme and necessary records</li> <li>• Emergency Preparedness and Response document which captures various emergency scenarios and the planned response to each scenario</li> <li>• Objectives (Quality and Environmental)</li> <li>• A system which enables users and/or individuals to register non-conforming service and/or practices. The system also specifies how such occurrences are</li> </ul>		

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	<ul style="list-style-type: none"> <li>- maintenance of records</li> <li>- independent (where practicable) internal auditing in order to determine whether or not the environmental management system conforms to planned arrangements and has been properly implemented and maintained.</li> <li>• review by top management.</li> </ul> <p>Three further features, which can complement the above stepwise, are considered as supporting measures. However, their absence is generally not inconsistent with BAT. These three additional steps are:</p> <ul style="list-style-type: none"> <li>• having the management system and audit procedure examined and validated by an accredited certification body or an external EMS verifier</li> <li>• preparation and publication (and possibly external validation) of a regular environmental statement describing all the significant environmental aspects of the installation, allowing for year-by-year comparison against environmental objectives and targets as well as with sector benchmarks as appropriate</li> <li>• implementation and adherence to an internationally accepted voluntary system such as EMAS and EN ISO 14001:1996. This voluntary step could give higher credibility to the EMS. In particular EMAS, which embodies all the above-mentioned features, gives higher credibility. However, non-standardised systems can in principle be equally effective provided that they are properly designed and implemented.</li> </ul> <p>Specifically for this industry sector, it is also important to consider the following potential features of the EMS:</p>	<p>to be recorded (Corrective Action Request), acted upon and verified for effective resolution or closure.</p> <ul style="list-style-type: none"> <li>• Auditing Schedule (internal; but will include plan for third party auditing in the near future)</li> <li>• Schedule of Management Review Meeting</li> </ul> <p>At a later stage, the Consortium will make available, before the plant starts operation:</p> <ul style="list-style-type: none"> <li>• Operation &amp; maintenance manual</li> <li>• Training Program</li> <li>• Design Risk Assessment</li> <li>• Fire and Explosion Risk Assessment</li> </ul> <p>This will be submitted to MEPA in due course.</p> <p>An outline decommissioning plan has already been prepared by WSM, as mentioned in section B2.10 of Annex 3 of the IPPC application.</p> <p>In addition, plant design incorporates bunding of all hazardous materials to minimize risk of land and ground water contamination and facilitate the decommissioning.</p>		

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	<ul style="list-style-type: none"> <li>giving consideration to the environmental impact from the eventual decommissioning of the unit at the stage of designing a new plant</li> <li>giving consideration to the development of cleaner technologies</li> <li>where practicable, sectoral benchmarking on a regular basis, including energy efficiency and energy conservation activities, choice of input materials, emissions to air, discharges to water, consumption of water and generation of waste</li> </ul>			
<b>Activities carried out</b>	<p>Ensure the provision of full details of the activities carried out on-site. A good detail of that is contained in the following documentation (see Section 4.1.2.7 and related to the previous aspect (preparation and publication)).</p> <ul style="list-style-type: none"> <li>descriptions of the waste treatment methods and procedures in place in the installation</li> <li>diagrams of the main plant items where they have some environmental relevance, together with process flow diagrams (schematics)</li> <li>details of the chemical reactions and their reaction kinetics/energy balance</li> <li>details on the control system philosophy and how the control system incorporates the environmental monitoring information</li> <li>details on how protection is provided during abnormal operating conditions such as momentary stoppages, start-ups, and shutdowns</li> </ul>	<p>See Appendix 01 - Process Description of this Annex.</p> <p>Further to this, please see find attached the following diagrams/drawings:</p> <p>Appendix 02 – Malta Mass Balance</p> <p>Appendix 03 – Layout Plan MTP</p> <p>Appendix 04 – Layout Plan AD</p> <p>Appendix 05 – Main Chemical Reactions</p> <p>Control system philosophy will be included in Control System Description as part of O&amp;M manual.</p> <p>The anaerobic digestion will be in continuous operation. Start-up is only expected once during initial commissioning. For around 1 month, the methane generated may be of poor quality and cannot be used in CHP's or even burned in the flare. After this period, the methane will be burned in the flare until it is of sufficient quality to be used in CHP's. CHP's start-up and shut-down will be at minimum duration and consequent additional emissions are negligible.</p>		

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	<ul style="list-style-type: none"> <li>• an instruction manual</li> <li>• an operational diary (related to the next aspect)</li> <li>• an annual survey of the activities carried out and the waste treated. The annual survey should also contain a quarterly balance sheet of the waste and residue streams, including the auxiliary materials used for each site (related to the EMS aspect).</li> </ul>	<p>Start-up and shut-down of the mechanical pre-treatment does not result in abnormal environmental emissions.</p> <p>Employees will be trained of how to handle momentary stoppages to ensure protection of the environment.</p> <p>Operation and Maintenance (O&amp;M) Manual will be available prior to plant start-up.</p> <p>A template of the diary will be agreed between the Contractor and WSM, to include the relevant information not stored in the Control System, for instance:</p> <ul style="list-style-type: none"> <li>- Daily quantity of incoming and outgoing waste of each type;</li> <li>- Start and finish times of plant activities;</li> <li>- Inspection and maintenance;</li> <li>- Breakdowns, plant disruptions or throughput reduction, with time duration and reasons;</li> <li>- Emergencies;</li> <li>- Suspicious waste received and actions taken;</li> <li>- Technical competent management attendance ;</li> <li>- Severe weather conditions;</li> <li>- Complaints and actions taken;</li> <li>- Environmental problems and remedial actions;</li> </ul> <p>Damages to the site security system and Fire Detection System;</p> <p>Recording of activities shall be included as part of the EMS. All waste movement activities shall be recorded by the use of scales at the weighbridge office.</p>		
<b>Housekeeping procedure</b>	Have a good housekeeping procedure in place, which will also cover the maintenance procedure, and an adequate training programme, covering the preventive actions that workers need to take on health and safety issues and environmental risks (see Sections 4.1.1.4, 4.1.1.5, 4.1.2.5, 4.1.2.10, 4.1.4.8 and	To be included in the O&M manual	<p><b>4.1.1.4 – Sampling</b></p> <p><b>4.1.1.5 – Reception facilities, including quarantine, sampling / analysis</b></p> <p>A risk based approach has been adopted</p>	

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	4.1.4.3).	<p>towards sampling. Considering that either MSW or BW are heterogeneous and foreseen incoming waste is non-hazardous, in addition to it not being practical to wait several days before the completion of laboratory analysis, visual check are considered appropriate and sufficient for these type of waste. Prior to mechanical treatment, the waste shall be visually checked by the grabber operator, before inputting to the mechanical treatment. In case of suspicions of being potentially hazardous, the suspicious waste shall be separated into a dedicated container. This waste shall be checked in detail and, if in case of keeping the suspicion, shall be driven to an authorized facility for that kind of waste.</p> <p><b>4.1.2.5 – Management techniques, including operational control, housekeeping, effluent, qualifications of personnel, peripheral structures</b> <b>4.1.2.10 – Qualified personnel</b></p> <p>This requirement is covered by the following documents and actions to be implemented prior to plant start-up:</p> <ul style="list-style-type: none"> <li>• O&amp;M Manual;</li> <li>• Training of operation personnel;</li> </ul> <p>Peripheral structures will be installed as per the approved design.</p> <p><b>4.1.4.8 – transfer from containers</b></p> <p><b>Odours control</b> Incoming waste will only be transferred into the system in the reception hall.</p> <p>Odour emissions will be minimized by using fast roller doors with air curtains and an air treatment system based on biofilters.</p> <p><b>Spillage of chemicals</b></p>	<p>Kindly advise whether personnel will be specifically dedicated towards the visual inspection, rather than having the grabber operator checking the material visually (e.g. the inspector/ Waste Acceptance Officer mentioned in the Waste-In procedure). Kindly indicate the training which shall be given in order to identify hazardous waste.</p>	<p><b>WSM intends to have a team of inspectors who will have the specific role of inspecting the waste as soon as it is received in the facility.</b></p> <p><b>Waste inspectors will be trained on:</b></p> <ul style="list-style-type: none"> <li>- <b>The general requirements of the IPPC permit with specific reference to the waste acceptance sections in the same permit. for waste acceptance as per the IPPC permit.</b></li> <li>- <b>The waste enquiry, acceptance and inspection procedure of the company which will form part of the Environment Management system.</b></li> <li>- <b>The different hazardous properties of waste as per the standard hazardous codes.</b></li> <li>- <b>It is not excluded that the company will ask inspectors to attend more specific courses on hazardous waste awareness however these will be determined once the inspectors are engaged with WasteServ. This will be even more so possible with the launch of the new WasteServ training academy.</b></li> </ul>

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		<p>Transfer of hazardous chemicals from drums into the system will be regulated by the O&amp;M manual, which will include procedures to avoid contamination of the environment and minimize risk of spillage during transfer.</p> <p>The principal hazardous chemicals foreseen to be used in the facility are listed below:</p> <ul style="list-style-type: none"> <li>• Hydraulic oil</li> <li>• Ferric Chloride</li> <li>• Acetic Acid</li> <li>• Sulphuric Acid</li> <li>• Antifoaming Agent</li> <li>• Polymer</li> </ul> <p><b>4.1.4.3 – Maintenance of storage</b></p> <p>An inspection program will be included in O&amp;M manual that covers storage areas, pipes, containers/tanks, including a system for keeping records</p>		
<b>Relationship with waste producer/holder</b>	Try to have a close relationship with the waste producer/holder in order that the customers sites implement measures to produce the required quality of waste necessary for the waste treatment process to be carried out (see Section 4.1.2.9).	N/A	Has not been specified. Kindly advise.	<p>The waste to be treated in the facility is mainly divided into three categories:</p> <ul style="list-style-type: none"> <li>- MSW</li> <li>- Bulky waste</li> <li>- Manure</li> </ul> <p>In the case of bulky waste and MSW, the heterogeneous quality of the waste is somewhat already known and not envisaged to vary.</p> <p>Information on the source of manure will be requested at the weighbridge. Carrier will be asked to specify the type of the manure and the source from where it is produced.</p> <p>It may be the case, that the manure is analysed prior to acceptance, however through time, the company intends to form a database of manure</p>

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Staff	Have sufficient staff available and on duty with the requisite qualifications at all times. All personnel should undergo specific job training and further education (see Section 4.1.2.10. This is also related to the Housekeeping procedure aspect).	WasteServ through the assistance of the contractor will provide: <ul style="list-style-type: none"> <li>• identification of permanent staff required for plant operation, including required base skills;</li> <li>• job training for the specific operation tasks.</li> </ul>		producers which will be considered as repetitive clients and therefore analysis is not deemed to be necessary.
Waste IN Knowledge	Have a concrete knowledge of the waste IN. Such knowledge needs to take into account the waste OUT, the treatment to be carried out, the type of waste, the procedure under consideration (see next aspects) and the risk (related to waste OUT and the treatment) (see Section 4.1.1.1). Guidance on some of these issues is provided in Sections 4.2.3, 4.3.2.2 and 4.4.1.2.	All waste collection vehicles reporting at SAWTP are requested to enter the site through the weighbridge. With the system in place, the following detail is captured: <ul style="list-style-type: none"> <li>• client name / organization</li> <li>• registration plate of vehicle disposing waste</li> <li>• waste type</li> <li>• source / destination</li> </ul> <p>and recorded on a weighbridge ticket.</p> <p>Depending on the type of waste, driver of waste collection vehicle is asked to dispose waste in predefined areas within the plant. Through random inspections, an Inspector confirms that the waste disposed is as declared by the driver and that it is in fact acceptable. Waste is rejected if Inspector finds out that the waste type is not authorised at the plant.</p>	This inspection procedure is rarely carried out by WSM. Kindly advise as regards implementation at the weighbridge, including facilitation of inspection by officers of the incoming waste through for example cameras, etc.	WasteServ intends to strengthen its inspectorate for the incoming waste in all its facilities. The Company plans to develop a Waste Acceptance team, which will also feature the inspectorate. The company has already started drafting procedures for the inspections of waste. The following is a draft procedure of what is planned: <b>Inspector</b> is responsible to: <ul style="list-style-type: none"> <li>• Collect Weighbridge Ticket(s) IN for the waste which requires inspection.</li> <li>• Inspect waste against Weighbridge Ticket(s) IN and Controlled Document Acceptable EWC codes at facility.</li> <li>• If waste is found to be <b>not</b> in-line with Weighbridge Ticket(s) IN and Controlled Document Acceptable EWC codes at facility. <ul style="list-style-type: none"> <li>– Take photos of findings.</li> <li>– List findings in <i>Check Request Sheet</i>.</li> <li>– Sign <i>Check Request Sheet</i> and ask Waste Carrier to do the same.</li> </ul> </li> </ul>

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				<ul style="list-style-type: none"> <li>– Give copy of Check Request Sheet to Waste Carrier and send original to Waste Acceptance Team (WAT).</li> <li>– Stamp both copies of the Weighbridge Ticket(s) IN as '<i>Inspected</i>' and give copy to Waste Carrier. File original for reference purposes.</li> <li>– Prepare Inspection Report (including scanned copy of <i>Check Request Sheet</i> and related photos) and send it to WAT.</li> <li>– Liaise with Manager for the clearing of the Inspection Area.</li> <li>• If waste is found to be in-line with Weighbridge Ticket(s) IN and Controlled Document Acceptable EWC codes at MEC.</li> <li>– Stamp both copies of the Weighbridge Ticket(s) IN as '<i>Inspected</i>' and give copy to Waste Carrier. File original for reference purposes.</li> <li>– Liaise with Manager for the clearing of the Inspection Area.</li> </ul> <p><b>Manager</b> is responsible to:</p> <ul style="list-style-type: none"> <li>• Liaise with Inspector for the clearing of the Inspection Area.</li> <li>• Separate and temporary store non-complaint waste in Quarantine Area.</li> </ul> <p><b>Waste Acceptance Team (WAT) Officer</b> is responsible to:</p> <ul style="list-style-type: none"> <li>• Vet Inspection Report to confirm that</li> </ul>

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Waste IN Pre-acceptance procedure	<p>Implement a pre-acceptance procedure containing at least the following items (see Section 4.1.1.2):</p> <ul style="list-style-type: none"> <li>tests for the incoming waste with respect to the planned treatment</li> <li>making sure that all necessary information is received on the nature of the process(es) producing the waste, including the variability of the process. The personnel having to deal with the pre-acceptance procedure need to be able due to his profession and/or experience to deal with all necessary questions relevant for the treatment of the wastes in the WT facility</li> <li>a system for providing and analysing a representative sample(s) of the waste from the production process producing such waste from the current holder.</li> <li>a system for carefully verifying, if not dealing directly with the waste producer, the information received at the pre-acceptance stage, including the contact details for the waste producer</li> </ul>	<p>A pre-acceptance procedure is in place specifying the method to follow when an enquiry for 'out-of-the-ordinary' waste disposal is put forward by a waste producer. In such case, the Waste Acceptance Officer (enquires about the tonnage and type of waste (including its EWC code) to be disposed of.</p> <p>After that, the Waste Acceptance Officer liaises with the Facility Manager to determine if waste can be used in the Anaerobic Digester.</p> <p>'Ordinary' waste like <i>Municipal Solid Waste (Black Bag)</i> are accepted at the plant without going through the pre-acceptance procedure. This does not imply that verification inspections are not carried out.</p>		<p>inspection findings are accurate.</p> <ul style="list-style-type: none"> <li>Based on the vetting exercise carried out, instruct Clerk in Data Section to amend Weighbridge Ticket as per findings in inspection report. Note: Inspection report number is written down (in amended Weighbridge Ticket) for back tracking purposes.</li> <li>Log entry in <i>Incident Report Logbook</i> and issue warning letter to Waste Carrier informing him/her of non-conformity to site rules.</li> <li>Depending on the frequency of non-conformities, prescribe penalties as specified in site rules.</li> </ul>

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	<p>and an appropriate description of the waste regarding its composition and hazardousness</p> <ul style="list-style-type: none"> <li>making sure that the waste code according to the European Waste List (EWL) is provided</li> <li>identifying the appropriate treatment for each waste to be received at the installation (see Section 4.1.2.1) by identifying a suitable treatment method for each new waste enquiry and having a clear methodology in place to assess the treatment of waste, that considers the physico-chemical properties of the individual waste and the specifications for the treated waste.</li> </ul>			
<b>Waste IN Acceptance procedure</b>	<p>Implement an acceptance procedure containing at least the following items (see Section 4.1.1.3):</p> <ul style="list-style-type: none"> <li>a clear and specified system allowing the operator to accept wastes at the receiving plant only if a defined treatment method and disposal/recovery route for the output of the treatment is determined (see pre-acceptance in the previous aspect). Regarding the planning for the acceptance, it needs to be guaranteed that the necessary storage (see Section 4.1.4.1), treatment capacity and dispatch conditions (e.g. acceptance criteria of the output by the other installation) are also respected</li> <li>measures in place to fully document and deal with acceptable wastes arriving at the site, such as a pre-booking system, to ensure e.g. that sufficient capacity is available</li> <li>clear and unambiguous criteria for the rejection of wastes and the reporting of all non conformances</li> </ul>	<p>Waste acceptance procedures shall be implemented for the MBT. Waste is accepted at the plant only if it falls within a predefined category of acceptable waste (example: MSW or waste fit for the anaerobic digestion process) as per permit.</p> <p>The Weighbridge Officer checks that incoming vehicles have the necessary MEPA Waste Carrier Registration and that the driver is wearing the appropriate PPE.</p> <p>Depending on the type of waste, the driver is directed towards the reception area (adequately sized and contained) of either the MTP, or the manure. The weighbridge ticket is finalized when the vehicle returns back to the weighbridge and weighed empty. All info of interest is captured on the weighbridge ticket. Furthermore, the (weighbridge system) is backed-up.</p> <p>In the eventuality that a waste carrier is rejected, details pertaining to the incidence are logged in the <i>Rejection Sheet</i>.</p>		
		<p>Random inspections are carried out as may be</p>		

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	<ul style="list-style-type: none"> <li>visually inspect the waste IN to check compliance with the description received during the pre-acceptance procedure. <i>For some liquid and hazardous waste, this BAT is not applicable</i> (see Section 4.1.1.3).</li> <li>a system for identifying the maximum capacity limit of waste that can be stored at the facility</li> </ul>	<p>required.</p> <p>Storage capacity limit:</p> <p><b>MSW:</b> The reception hall has been designed to cater for 4 days storage of MSW. However, it is expected that this capacity will not be used in full under normal operation since good practice dictate that waste is treated as soon as possible after reception (a daily basis is recommended). As the maximum capacity is for a 4 m high waste pile, the available remaining storage capacity can be easily calculated as per the available area.</p> <p><b>BW:</b> Will be treated on a daily basis. No storage is foreseen.</p> <p><b>MANURE:</b> Will be treated on a daily basis, using a storage dosing bunker with capacity for one day (20 m3). No storage is foreseen.</p>		
Waste IN Sampling procedures	<p>Implement different sampling procedures for all different incoming waste vessels delivered in bulk and/or containers. These sample procedures may contain the following items (see Section 4.1.1.4):</p> <ul style="list-style-type: none"> <li>sampling procedures based on a risk approach. Some elements to consider are the type of waste (e.g. <i>hazardous</i> or non-hazardous) and the knowledge of the customer (e.g. waste producer)</li> <li>check on the relevant physico-chemical parameters. The relevant parameters are related to the knowledge of the waste needed in each case</li> <li>registration of all waste materials</li> <li>have different sampling procedures for</li> </ul>	N/A – Refer to housekeeping procedures above.		

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	<p>bulk (liquid and solids), large and small containers and laboratory smalls. The number of samples taken should increase with the number of containers. In extreme situations, small containers must all be checked against the accompanying paperwork. The procedure should contain a system for recording the number of samples and degree of consolidation</p> <ul style="list-style-type: none"> <li>• details of the sampling of wastes in drums within designated storage, e.g. the time-scale after receipt</li> <li>• sample prior to acceptance</li> <li>• maintenance of a record at the installation of the sampling regime for each load, together with a record of the justification for the selection of each option</li> <li>• a system for determining and recording: <ul style="list-style-type: none"> <li>- a suitable location for the sampling points</li> <li>- the capacity of the vessel sampled (for samples from drums, an additional parameter would be the total number of drums)</li> <li>- the number of samples and degree of consolidation</li> <li>- the operating conditions at the time of sampling</li> </ul> </li> <li>• a system to ensure that the waste samples are analysed (see Section 4.1.1.5)</li> <li>• in the case of cold ambient temperatures, a temporary storage may be needed in order to allow sampling after defrosting. This may affect the applicability of some of the above items in this BAT (see Section 4.1.1.5).</li> </ul>			
<b>Waste IN Reception facility</b>	<p>Have a reception facility covering at least the following issues (see Section 4.1.1.5):</p> <ul style="list-style-type: none"> <li>• have a laboratory to analyse all the samples at the speed required by BAT. Typically this requires having a robust</li> </ul>	<p>Depending on the waste being disposed of, the waste collection vehicle proceeds to either of the waste reception halls.</p>	<p>Kindly clarify how th quality, source and consistency of manure will be assessed.</p>	<p>The quality of the incoming manure should have a quality of:</p> <ul style="list-style-type: none"> <li>• heavy impurities below 1% of dry</li> </ul>

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	<p>quality assurance system, quality control methods and maintaining suitable records for storing the analyses results. <i>Particularly for hazardous wastes, this often means that the laboratory needs to be on-site</i></p> <ul style="list-style-type: none"> <li>• have a dedicated quarantine waste storage area as well as written procedures to manage non-accepted waste. If the inspection or analysis indicates that the wastes fail to meet the acceptance criteria (including, e.g. damaged, corroded or unlabelled drums) then the wastes can be temporarily stored there safely. Such storage and procedures should be designed and managed to promote the rapid management (typically a matter of days or less) to find a solution for that waste</li> <li>• have a clear procedure dealing with wastes where inspection and/or analysis prove that they do not fulfil the acceptance criteria of the plant or do not fit with the waste description received during the pre-acceptance procedure. The procedure should include all measures as required by the permit or national/international legislation to inform competent authorities, to safely store the delivery for any transition period or to reject the waste and send it back to the waste producer or to any other authorised destination</li> <li>• move waste to the storage area only after acceptance of the waste</li> <li>• mark the inspection, unloading and sampling areas on a site plan</li> <li>• have a sealed drainage system</li> </ul>	<p>A contained drainage system will be in place inside the plant, driving all drainage from the different hall to an underground process water tank. This water will be used in the process.</p>		<p>matter; and</p> <ul style="list-style-type: none"> <li>• straw content below 2% of dry matter</li> </ul> <p>However, it is the nature of manure to have unpredictable variations in its composition. This was taken into account when planning the AD plant. The acceptable variations of the different manure composition are +- 15%.</p> <p>Information on the source of manure will be requested at the weighbridge. Carrier will be asked to specify the type of the manure and the source from where it is produced.</p> <p>It may be the case, that the manure is analysed prior to acceptance, however through time, the company intends to form a database of manure producers which will be considered as repetitive clients and therefore analysis is not deemed to be necessary.</p>
	<ul style="list-style-type: none"> <li>• a system to ensure that the installation</li> </ul>			

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	<p>personnel who are involved in the sampling, checking and analysis procedures are suitably qualified and adequately trained, and that the training is updated on a regular basis</p> <ul style="list-style-type: none"> <li>the application of a waste tracking system unique identifier (label/code) to each container at this stage. The identifier will contain at least the date of arrival on-site and the waste code.</li> </ul>																		
<b>Waste OUT Analysing</b>	<p>Analyse the waste OUT according to the relevant parameters important for the receiving facility (e.g. landfill, incinerator) (see Section 4.1.1.1).</p>	<p>Considering that all of incoming waste is not hazardous (suspicious waste shall be treated as mentioned above) than the outgoing waste is also not hazardous.</p> <p>The incoming waste will be separated at various stages, both mechanically and manually (in the sorting cabin) to produce a variety of segregated waste, as indicated in Appendix 02 – Mass Balance.</p> <p>The Outgoing waste shall be transferred to the appropriate facilities:</p> <p>Baled fractions (plastics, paper, cardboard, metal, etc) are retailed and exported accordingly. RDF (which is considered a reject) is exported to an approved treatment facility. Destruction certificates and/or Waste Movement Document (Annex 7) are collected and stored.</p> <p>Compost-like waste (which is a by-product of the anaerobic digestion process) is disposed of at the Ghallis engineered landfill.</p> <p>Other by-product waste from the MTP (example: rejects from MTP, waste captured in sand-trap, etc) is also sent to Ghallis engineered landfill.</p>	<p>It is stated that compost-like waste shall be disposed of at Ghallis landfill. End of waste criteria are to be assessed.</p>	<p>The compost like waste should have approximately the following properties:</p> <table border="1" data-bbox="2169 779 2703 1367"> <thead> <tr> <th>Parameter</th> <th>Units</th> <th>Limit Value</th> </tr> </thead> <tbody> <tr> <td>Degree of maturity (German Rottegrad)</td> <td></td> <td>5</td> </tr> <tr> <td>Dry substance</td> <td>Wt %</td> <td>&gt; 30 %</td> </tr> <tr> <td>Stones &gt; 5mm</td> <td>Wt %</td> <td>&lt; 2% of dry substance</td> </tr> <tr> <td>Other extraneous material (glass, plastics, metals) &gt; 2mm</td> <td>Wt %</td> <td>&lt; 3% of dry substance</td> </tr> </tbody> </table> <p>This material is not intended for re-use but for disposal at the landfill therefore end of waste criteria are not applicable but rather the material will be periodically analysed as per Council Decision 2003/33/EC for landfilling.</p>	Parameter	Units	Limit Value	Degree of maturity (German Rottegrad)		5	Dry substance	Wt %	> 30 %	Stones > 5mm	Wt %	< 2% of dry substance	Other extraneous material (glass, plastics, metals) > 2mm	Wt %	< 3% of dry substance
Parameter	Units	Limit Value																	
Degree of maturity (German Rottegrad)		5																	
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Other extraneous material (glass, plastics, metals) > 2mm	Wt %	< 3% of dry substance																	
<b>Management systems Traceability</b>	<p>Have a system in place to guarantee the traceability of waste treatment. Different procedures may be needed to take into account</p>	<p>As per section 4.1.2.3 of BREF for Waste Treatment Industries, the application of some of these technics may not be possible when</p>	<p>Kindly advise as regards to whether a system will be in place to trace the farm from which the manure or slurry waste originates.</p>	<p>Information on the source of manure will be requested at the weighbridge. Carrier will be asked to specify the type of the manure and the</p>															

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	<p>the physico-chemical properties of the waste (e.g. liquid, solid), type of WT process (e.g. continuous, batch) as well as the changes that may occur to the physico-chemical properties of the wastes when the WT is carried out. A good traceability system contains the following items (see Section 4.1.2.3):</p> <ul style="list-style-type: none"> <li>• documenting the treatments by flow charts and mass balances (see Section 4.1.2.4)</li> <li>• carrying out data traceability through several operational steps (e.g pre-acceptance/acceptance/storage/treatment/dispatch). Records can be made and kept up-to-date on an ongoing basis to reflect deliveries, on-site treatment and dispatches. Records are typically held for a minimum of six months after the waste has been dispatched</li> <li>• recording and referencing the information on waste characteristics and the source of the waste stream, so that it is available at all times. A reference number needs to be given to the waste and needs to be obtainable at any time in the process to enable the operator to identify where a specific waste is in the installation, the length of time it has been there and the proposed or actual treatment route</li> <li>• having a computer database/series of databases, which are regularly backed up. The tracking system operates as a waste inventory/stock control system and includes: date of arrival on-site, waste producer details, details on all previous holders, an unique identifier, pre-acceptance and acceptance analysis results, package type and size, intended treatment/ disposal route, an accurate record of the nature and quantity of wastes held on-site including all hazards details on where the waste is physically located in relation to a site</li> </ul>	<p>installation operates in a continuous basis.</p> <p>In fact, it will not be possible to keep track of each individual consignments of incoming waste since different consignments will be mixed together in the process tanks on a continuous basis.</p> <p>Nevertheless, records will be kept of incoming and outgoing waste consignment and this process will be under supervision of plant operation staff.</p>		source from where it is produced.

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	<p>plan, at which point in the designated disposal route the waste is currently positioned</p> <ul style="list-style-type: none"> <li>only moving drums and other mobile containers between different locations (or loaded for removal off site) under instructions from the appropriate manager, ensuring that the waste tracking system is amended to record these changes (see Section 4.1.4.8).</li> </ul>			
<b>Management systems</b> <b>Mixing and blending rules</b>	<p>Have and apply mixing/blending rules oriented to restrict the types of wastes that can be mixed/blended together in order to avoid increasing pollution emission of down-stream waste treatments. These rules need to consider the type of waste (e.g. <i>hazardous</i>, non-hazardous), waste treatment to be applied as well as the following steps that will be carried out to the waste OUT (see Section 4.1.5).</p>	<p>Wastes accepted will be fully compatible at any proportion, all non-hazardous.</p>		
<b>Management systems</b> <b>Segregation and compatibility procedure</b>	<p>Have a segregation and compatibility procedure in place (see Section 4.1.5), including:</p> <ul style="list-style-type: none"> <li>keeping records of the testing, including any reaction giving rise to safety parameters (increase in temperature, generation of gases or raising of pressure); a record of the operating parameters (viscosity change and separation or precipitation of solids) and any other relevant parameters, such as generation of odours (see Sections 4.1.4.13 and 4.1.4.14)</li> <li>packing containers of chemicals into separate drums based on their hazard classification. Chemicals which are incompatible (e.g. oxidisers and flammable liquids should not be stored in the same drum (see Section 4.1.4.6).</li> </ul>	<p>Wastes accepted will be fully compatible at any proportion, all non-hazardous. Also chemical waste or it's packing containers are not expected.</p> <p>However, records of relevant process parameters are kept and used to search the origin of any significant deviation</p>		
<b>Management systems</b> <b>Efficiency</b>	<p>Have an approach for improving waste treatment efficiency. This typically includes the finding of suitable indicators to report WT</p>	<p>An element of reject shall always be present in the sorting line however WasteServ shall place all effort to minimise its losses in terms of</p>		

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	efficiency and a monitoring programme (see Section 4.1.2.4).	costs when selling the collected recyclable material and to reduce the burden on the Ghallis non-hazardous waste landfill.		
<b>Management systems Accident Management Plan</b>	Produce a structured accident management plan (see Section 4.1.7).	This mater will included in Hazard and Operability Assessment Study (HAZOP) which is still to be prepared.		
<b>Management systems Incident diary</b>	Have and properly using an incident diary (see Section 4.1.7).	<i>Environment Accident Register</i> is available on the company server (with read/write rights given to Facility Managers, Plant Engineers, etc)		
<b>Management systems Noise and vibration management plant</b>	Have a noise and vibration management plant in place as part of the EMS (see Section 4.1.8). For some WT installations, noise and vibration may not be an environmental problem.	Noise and vibration monitoring shall be included as part of the environmental monitoring programme within Ghallis.  When necessary, noisy equipment will be locate within enclosures or rooms to attenuate the noise generated.  Baseline and operational noise and vibration measurements will be undertaken.		
<b>Management systems Decommissioning</b>	Consider any future decommissioning at the design stage. For existing installations and where decommissioning problems are identified, put a programme to minimise these problems in place (see Section 4.1.9).	An outline decommissioning plan has already been prepared by WSM, as mentioned in section B2.10 of Annex 3 of the IPPC application.  In addition, plant design incorporates bunding of all hazzadous materials to minimize risk of land and ground water contamination and facilitate the decomissioning.		
<b>Utilities and raw material management Raw material consumption and generation</b>	Provide a breakdown of the energy consumption and generation (including exporting) by the type of source (i.e. electricity, gas, liquid conventional fuels, solid conventional fuels and waste) (see Section 4.1.3.1). This involves: <ul style="list-style-type: none"> <li>• reporting the energy consumption information in terms of delivered energy</li> <li>• reporting the energy exported from the installation</li> <li>• providing energy flow information (for example, diagrams or energy balances) showing how the energy is used</li> </ul>	Please refer to item B.2.6.1 of Annex 3 of the IPPC Application.		

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	throughout the process.			
<b>Utilities and raw material management</b> Energy efficiency	Continuously increase the energy efficiency of the installation, by (see Section 4.1.3.4): <ul style="list-style-type: none"> <li>developing an energy efficiency plan</li> <li>using techniques that reduce energy consumption and thereby reduce both direct (heat and emissions from on-site generation) and indirect (emissions from a remote power station) emissions</li> <li>defining and calculating the specific energy consumption of the activity (or activities), setting key performance indicators on an annual basis (e.g. MWh/tonne of waste processed).</li> </ul>	Please refer to section B2.6.2 of the IPPC application, Annex 3.	In addition, CHP plant will also be in operation providing combined heat and power.	
<b>Utilities and raw material management</b> Internal benchmarking	Carry out an internal benchmarking (e.g. on an annual basis) of raw materials consumption. Some applicability limitations have been identified and these are mentioned in Section 4.1.3.5.	To be included as part of the EMS.		
<b>Utilities and raw material management</b> Waste as a raw material	Explore the options for the use of waste as a raw material for the treatment of other wastes (see Section 4.1.3.5). If waste is used to treat other wastes, then to have a system in place to guarantee that the waste supply is available. If this cannot be guaranteed, a secondary treatment or other raw materials should be in place in order to avoid any unnecessary waiting treatment time (see Section 4.1.2.2).	Section 4.1.3.5 of BREF refers to the reuse of waste lime / acid for treatment, which are not applicable in this facility. Wastewater will be reused in the treatment process and will always be available as the production of wastewater is a necessary part of the process. Service water (from rain water runoff) also available if necessary.		
<b>Storage and handling</b> Storage	Apply the following techniques related to storage (see Section 4.1.4.1): <ul style="list-style-type: none"> <li>locating storage areas: <ul style="list-style-type: none"> <li>away from watercourses and sensitive perimeters, and</li> <li>in such a way so as to eliminate or minimise the double handling of wastes within the installation</li> </ul> </li> <li>ensuring that the storage area drainage infrastructure can contain all possible contaminated run-off and that drainage</li> </ul>	Waste is only stored within the designated halls that are all bounded.	The only products foreseen to be stored outside are the bales of RDF, Paper/Card and Plastic. However, these bales are shrink wrapped to ensure no contact of rain water with the product.	
		It is not foreseen double handling of waste.		
		No incompatible waste is foreseen.		

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	from incompatible wastes cannot come into contact with each other	<p>Site containment is included:</p> <ul style="list-style-type: none"> <li>• In the halls, potentially contaminated drainage is collected in dedicated process waste water tank to be used for the process;</li> <li>• The digesters, suspension buffer and aeration tanks are placed in a bund;</li> <li>• In the other outside areas, potentially contaminated run-off water is diverted to underground reservoirs, fitted with a silt trap and oil-water interceptor to ensure that clean water enter the reservoirs;</li> </ul> <p>Chemicals are stored within dedicated bounded rooms. Chemical tanks placed in the outside have their own bund or double wall.</p>		
	<ul style="list-style-type: none"> <li>• using a dedicated area/store which is equipped with all necessary measures related to the specific risk of the wastes for sorting and repackaging laboratory smalls or similar waste. These wastes are sorted according to their hazard classification, with due consideration for any potential incompatibility problems and then repackaged. After that, they are removed to the appropriate storage area</li> <li>• handling odorous materials in fully enclosed or suitably abated vessels and storing them in enclosed buildings connected to abatement</li> </ul>	Not applicable. No hazardous waste is foreseen.		
	<ul style="list-style-type: none"> <li>• ensuring that all connections between the vessels are capable of being closed via valves. Overflow pipes need to be directed to a contained drainage system (i.e. the relevant bunded area or another vessel)</li> </ul>	<p>The tanks subject to important odour emissions will be closed and connected to the air treatment system.</p> <p>All connections between the vessels are capable of being closed via valves.</p> <p>Overflow pipes are all directed to the respective bounded areas.</p>		
	<ul style="list-style-type: none"> <li>• having measures available to prevent the building up of sludges higher than a certain level and the emergence of foams that may affect such measures in liquid tanks, e.g. by regularly</li> </ul>	<p>These measures are foreseen, namely:</p> <ul style="list-style-type: none"> <li>• level sensors, integrated in control system, will regulate sludge levels;</li> <li>• antifoaming agents will be used in relevant parts of the process, namely in WWTP, aeration tanks and dewatering.</li> </ul>		

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	controlling the tanks, sucking out the sludges for appropriate further treatment and using anti-foaming agents	Confirmed – Refer to previous section on storage and handling.		
	<ul style="list-style-type: none"> <li>equipping tanks and vessels with suitable abatement systems when volatile emissions may be generated, together with level meters and alarms. These systems need to be sufficiently robust (able to work if sludge and foam is present) and regularly maintained</li> </ul>	Not applicable.		
	<ul style="list-style-type: none"> <li>storing organic waste liquid with a low flashpoint under a nitrogen atmosphere to keep it inertised. Each storage tank is put in a waterproof retention area. Gas effluents are collected and treated.</li> </ul>			
<b>Storage and handling Bunding</b>	Separately bund the liquid decanting and storage areas using bunds which are impermeable and resistant to the stored materials (see Section 4.1.4.4).	Impermeable and resistant bunds will be used for waste storage. No specific decanting is foreseen in those areas.		
<b>Storage and handling Tank and process pipework</b>	<p>Apply the following techniques concerning tank and process pipework labelling (see Section 4.1.4.12):</p> <ul style="list-style-type: none"> <li>clearly labelling all vessels with regard to their contents and capacity, and applying an unique identifier. Tanks need to have an appropriately labelled system depending on their use and contents</li> <li>ensuring that the label differentiates between waste water and process water, combustible liquid and combustible vapour and the direction of flow (i.e. in or outflow)</li> <li>keeping records for all tanks, detailing the unique identifier; capacity; its construction, including materials; maintenance schedules and inspection results; fittings; and the waste types which may be stored/treated in the</li> </ul>	<p>All vessels have a unique identifier as per the P&amp;ID tag number (from KKS code). The respective label will include the tag number, content (with colour code) and capacity. Main pipes will be labelled with direction of flow, with colour differentiations.</p> <p>Records will be kept.</p>		

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	vessel, including flashpoint limits.			
<b>Storage and handling Accumulation</b>	Take measures to avoid problems that may be generated from the storage/accumulation of waste. This may conflict with BAT on “Utilities and raw material management: Waste as a raw material” when waste is used as a reactant (see Section 4.1.4.10).	<p>Storage capacity limit:</p> <p><b>MSW:</b> The reception hall has been designed to cater for 4 days storage of MSW. However, it is expected that this capacity will not be used in full under normal operation since good practice dictate that waste is treated as soon as possible after reception (a daily basis is recommended). As the maximum capacity is for a 4 m high waste pile, the available remaining storage capacity can be easily calculated as per the available area.</p> <p><b>BW:</b> Will be treated on a daily basis. No storage is foreseen.</p> <p><b>MANURE:</b> Will be treated on a daily basis, using a storage dosing bunker with capacity for one day (20 m3). No storage is foreseen.</p>		
<b>Storage and handling Handling</b>	<p>Apply the following techniques when handling waste (see Section 4.1.4.6):</p> <ul style="list-style-type: none"> <li>• having systems and procedures in place to ensure that wastes are transferred to the appropriate storage safely</li> <li>• having in place a management system for the loading and unloading of waste in the installation, which also takes into consideration any risks that these activities may incur. Some options for this include ticketing systems, supervision by site staff, keys or colour-coded points/hoses or fittings of a specific size</li> <li>• ensuring that a qualified person attends the waste holder site to check the laboratory smalls, the old original waste, waste from an unclear origin or undefined waste (especially if drummed), to classify the substances</li> </ul>	A system for waste reception at the plant will be prepared and included in O&M manual.	Not applicable. Only MSW, BW and Manure, non-hazardous, will be accepted at plant.	

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	<p>accordingly and to package into specific containers. In some cases, the individual packages may need to be protected from mechanical damage in the drum with fillers adapted to the packaged waste properties</p> <ul style="list-style-type: none"> <li>• ensuring that damaged hoses, valves and connections are not used</li> <li>• collecting the exhaust gas from vessels and tanks when handling liquid waste</li> <li>• unloading solids and sludge in closed areas which are fitted with extractive vent systems linked to abatement equipment when the handled waste can potentially generate emission to air (e.g. odours, dust, VOCs) (see Section 4.1.4.7)</li> <li>• using a system to ensure the bulking of different batches only takes place with compatibility testing (see Section 4.1.4.7 and 4.1.5).</li> </ul>	<p>This practice will be ensured during operation.</p> <p>Please refer to the housekeeping section above. Additionally, the tanks subject to important odour emissions will be closed and connected to the air treatment system.</p> <p>Not applicable.</p>		
<b>Storage and handling</b> <b>Bulking and mixing</b>	<p>Ensure that the bulking/mixing to or from packaged waste only takes place under instruction and supervision and is carried out by trained personnel. For certain types of wastes, such a bulking/mixing needs to be carried out under local exhaust ventilation (see Section 4.1.4.8).</p>	<p>Waste input in the plant (MSW, BW or MANURE) will be done by trained staff. Special measures of exhaust ventilation abatement will be installed.</p>		
<b>Storage and handling</b> <b>Chemical incompatibilities</b>	<p>Ensure that chemical incompatibilities guide the segregation required during storage (see Section 4.1.4.13 and 4.1.4.14).</p>	<p>Not applicable – no chemical waste shall be treated in the facility.</p>		
<b>Storage and handling</b> <b>Containerised wastes</b>	<p>Apply the following techniques when containerised wastes are handled (see Section 4.1.4.2):</p> <ul style="list-style-type: none"> <li>• storing of containerised wastes under cover. This can also be applied to any container that is held in storage pending sampling and emptying. Some exceptions on the applicability of this technique related to containers or waste not affected by ambient conditions (e.g. sunlight, temperature, water) have been</li> </ul>	<p>Not applicable. No containerised wastes are foreseen to be treated.</p>		

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	<p>identified (see Section 4.1.4.2). Covered areas need to have adequate provision for ventilation</p> <ul style="list-style-type: none"> <li>maintaining the availability and access to storage areas for containers holding substances that are known to be sensitive to heat, light and water, under cover and protected from heat and direct sunlight.</li> </ul>			
<b>Extractive vent systems</b>	<p>Perform crushing, shredding and sieving operations in areas fitted with extractive vent systems linked to abatement equipment (see Section 4.1.6.1) when handling materials that can generate emission to air (e.g. odours, dust, VOCs).</p>	<p>Air treatment system includes a general odour treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crashing area.</p> <p>By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.</p>	<p>Foreseen limit of emissions:            Odour (OUE/m3): &lt;500            Dust&lt;=10mg/Nm3</p>	
<b>Full encapsulation / Inert atmosphere</b>	<p>Perform crushing/shredding operations (see Sections 4.1.6.1 and 4.6) under full encapsulation and under an inert atmosphere for drums/containers containing flammable or highly volatile substances. This will avoid ignition. The inert atmosphere is to be abated.</p>	<p>Not applicable. Hazardous waste shall not be treated in the plant.</p>		
<b>Washing processes</b>	<p>Perform washing processes considering (see Section 4.1.6.2):</p> <ul style="list-style-type: none"> <li>identifying the washed components that may be present in the items to be washed (e.g. solvents)</li> <li>transferring washings to appropriate storage and then treating them in the same way as the waste from which they were derived</li> <li>using treated waste water from the WT plant for washing instead of fresh water. The resultant waste water can then be treated in the WWTP or re-used in the installation.</li> </ul>	<p>A contained drainage system will be in place inside the plant, driving all drainage from the different hall to an underground process water tank. This water will be used in the process.</p> <p>Wastewater will be reused in the treatment process (define as process water). Service water (from rain water runoff) will be used for specific needs, when higher quality water is required.</p>		
<b>Air emission</b>	<p>Restrict the use of open topped tanks, vessels</p>	<p>Waste is only stored within the designated</p>		

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treatments	<p>and pits by:</p> <ul style="list-style-type: none"> <li>not allowing direct venting or discharges to air by linking all the vents to suitable abatement systems when storing materials that can generate emissions to the air (e.g. odours, dust, VOCs) (see Section 4.1.4.5)</li> <li>keeping the waste or raw materials under cover or in waterproof packaging (see Section 4.1.4.5)</li> <li>connecting the head space above the settlement tanks (e.g. where oil treatment is a pre-treatment process within a chemical treatment plant) to the overall site exhaust and scrubber units (see Section 4.1.4.1).</li> </ul>	<p>halls that are all bounded.</p> <p>The only products foreseen to be stored outside are the bales of RDF, Paper/Card and Plastic. However, these bales are shrink wrapped to ensure no contact of rain water with the product.</p> <p>It is not foreseen double handling of waste.</p> <p>Please refer to the housekeeping section above. Additionally, the tanks subject to important odour emissions will be closed and connected to the air treatment system.</p>		
	<p>The use of an enclosed system with extraction, or under depression, to a suitable abatement plant. This technique is especially relevant to processes which involve the transfer of volatile liquids, including during tanker charging/discharging (see Section 4.6.1).</p>	<p>Please refer to the housekeeping section above. Additionally, the tanks subject to important odour emissions will be closed and connected to the air treatment system.</p>		
	<p>Apply a suitably sized extraction system which can cover the holding tanks, pre-treatment areas, storage tanks, mixing/reaction tanks and the filter press areas, or to have in place a separate system to treat the vent gases from specific tanks (for example, activated carbon filters from tanks holding waste contaminated with solvents) (see Section 4.6.1).</p>	<p>Air treatment system includes a general odour treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crashing area.</p> <p>By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.</p> <p>Foreseen limit of emissions:  Odour (OUE/m3): &lt;500  Dust&lt;=10mg/Nm3</p>		
	<p>Correctly operate and maintain the abatement equipment, including the handling and treatment/disposal of spent scrubber media (see Section 4.6.11).</p>	<p>To be included in the O&amp;M manual.</p>		
	<p>Have a scrubber system in place for the major inorganic gaseous releases from those unit operations which have a point discharge for process emissions. Install a secondary scrubber</p>	<p>A proper system of odour abatement, using scrubber, will be installed.</p> <p>Air treatment system includes a general odour</p>		

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	<p>unit to certain pre-treatment systems if the discharge is incompatible or too concentrated for the main scrubbers (see Section 4.6.11).</p> <p>Have leak detection and repair procedures in place in installations</p> <ul style="list-style-type: none"> <li>• handling a large number of piping components and storage and</li> <li>• compounds that may leak easily and create an environmental problem (e.g. fugitive emissions, soil contamination) (see Section 4.6.2).</li> </ul> <p>This may be seen as an element of the EMS.</p>	<p>treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crashing area.</p> <p>By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.</p> <p>Foreseen limit of emissions:            Odour (OU<sub>E</sub>/m<sup>3</sup>): &lt;500            Dust&lt;=10mg/Nm<sup>3</sup></p> <p>An inspection program will be included in O&amp;M manual that covers storage areas, pipes, containers/tanks, including a system for keeping records</p>								
<b>Air emission levels</b>	<p>Reduce air emission to the following levels</p> <table border="1" data-bbox="394 1062 964 1220"> <thead> <tr> <th data-bbox="409 1062 706 1125">Air parameter</th> <th data-bbox="721 1062 964 1125">Emission levels associated with use of BAT (mg/Nm<sup>3</sup>)</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 1125 706 1167">VOC</td> <td data-bbox="721 1125 964 1167">7 – 20<sup>1</sup></td> </tr> <tr> <td data-bbox="409 1167 706 1209">PM</td> <td data-bbox="721 1167 964 1209">5 – 20</td> </tr> </tbody> </table> <p><sup>1</sup> For low VOC loads, the higher end of the range can be extended</p> <p>by using a suitable combination of preventive and/or abatement techniques (see Section 4.6). The techniques mentioned above in the BAT 'Air emission treatments' section also contribute to achieve these values.</p>	Air parameter	Emission levels associated with use of BAT (mg/Nm <sup>3</sup> )	VOC	7 – 20 <sup>1</sup>	PM	5 – 20	<p>Reduction of emissions and foreseen limits:</p> <p>Air treatment system includes a general odour treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crashing area.</p> <p>By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.</p> <p>Foreseen limit of emissions:            Odour (OU<sub>E</sub>/m<sup>3</sup>): &lt;500            Dust&lt;=10mg/Nm<sup>3</sup></p>		
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VOC	7 – 20 <sup>1</sup>									
PM	5 – 20									
<b>Waste water management</b>	<p>Reduce the water use and the contamination of water by (see Sections 4.1.3.6 and 4.7.1):</p> <ul style="list-style-type: none"> <li>• applying site waterproofing and storage retention methods</li> <li>• applying separated water drainage according to the pollution load (roof water, road water, process water)</li> <li>• applying a security collection basin</li> <li>• performing regular water audits, with the aim of reducing water consumption</li> </ul>	<p>All tanks and bounds will be waterproof. A bounding will be provided when necessary.</p> <p>Waste is only stored within the designated halls that are all bounded.</p> <p>The only products foreseen to be stored outside are the bales of RDF, Paper/Card and Plastic. However, these bales are shrink wrapped to ensure no contact of rain water</p>								



Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply Feb 2015
	<p>areas is collected along with tanker washings, occasional spillages, drum washings, etc. and returned to the processing plant or collected in a combined interceptor (see Section 4.7.1).</p>	<p>different hall to an underground process water tank. This water will be used in the process.</p>		
	<p>Segregate the water collecting systems for potentially more contaminated waters from less contaminated water (see Section 4.7.2).</p>	<p>Separated water drainage and collection will be implemented for roof water, road water and process water.</p>	<p>For road water, a treatment/security system will be in place, including:</p> <ul style="list-style-type: none"> <li>• a collection basin previous to the tanks;</li> <li>• silt trap and oil/water interceptor;</li> </ul> <p>gate/slucice valve to prevent entry into the tanks in case of a spillage.</p>	
	<p>Have a full concrete base in the whole treatment area that falls to internal site drainage systems which lead to storage tanks or to interceptors that can collect rainwater and any spillage. Interceptors with an overflow to sewer usually need automatic monitoring systems, such as pH checks, which can shut down the overflow (see Section 4.1.3.6).</p>	<p>A full concrete base will be in place in the whole treatment area where a duly drainage will be assured:</p> <p>A contained drainage system will be in place inside the plant, driving all drainage from the different hall to an underground process water tank. This water will be used in the process.</p> <p>There will not be any overflows to sewer.</p>		
<b>Rainwater collecting</b>	<p>Collect the rainwater in a special basin for checking, treatment if contaminated and further use (see Section 4.7.1).</p>	<p>Separated water drainage and collection will be implemented for roof water, road water and process water.</p>	<p>For road water, a treatment/security system will be in place, including:</p> <ul style="list-style-type: none"> <li>• a collection basin previous to the tanks;</li> <li>• silt trap and oil/water interceptor;</li> </ul> <p>gate/slucice valve to prevent entry into the tanks in case of a spillage.</p>	
<b>Re-use</b>	<p>Maximise the re-use of treated waste waters and use of rainwater in the installation (see Section 4.7.1).</p>	<p>A contained drainage system will be in place inside the plant, driving all drainage from the different hall to an underground process water tank. This water will be used in the process.</p> <p>Wastewater will be reused in the treatment process (define as process water). Service water (from rain water runoff) will be used for specific needs, when higher quality water is</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply Feb 2015
Daily checks	Conduct daily checks on the effluent management system and to maintain a log of all checks carried out, by having a system for monitoring the effluent discharge and sludge quality in place (see Section 4.7.1).	required. No bypass of the effluent is foreseen.		
	Firstly identify waste waters that may contain hazardous compounds (e.g. adsorbable organically bound halogens (AOX); cyanides; sulphides; aromatic compounds; benzene or hydrocarbons (dissolved, emulsified or undissolved); and metals, such as mercury, cadmium, lead, copper, nickel, chromium, arsenic and zinc) (see Section 4.7.2). Secondly, segregate the previously identified waste water streams on-site and thirdly, specifically treat waste water on-site or off-site.	Only one WW stream will be generated and any contamination by hazardous substances is expected to be minimal. The WW will be pre-treated on site and collected by bowsers for further treatment off - site.		
	Ultimately after the application of “the water use and the contamination of water reduction”, select and carry out the appropriate treatment technique for each type of waste water (see Section 4.7.1).	Only one WW stream will be generated and any contamination by hazardous substances is expected to be minimal. The WW will be pre-treated on site and collected by bowsers for further treatment off - site.		
	Implement measures to increase the reliability with which the required control and abatement performance can be carried out (for example, optimising the precipitation of metals) (see Section 4.7.1).	Not applicable		
	Identify the main chemical constituents of the treated effluent (including the make-up of the COD) and to then make an informed assessment of the fate of these chemicals in the environment (see Section 4.7.1 and their applicability restrictions identified).	Not applicable - It is important to mention that this plant only provide a pre-treatment that prepares the effluent for a further treatment off-site.		
	Only discharge the waste water from its storage after the conclusion of all the treatment measures and a subsequent final inspection (see Section 4.7.1).	Confirmed.		
<b>Water emission</b>	Achieve the following water emission values before discharge:	It is important to mention that this plant only provide a pre-treatment that prepares the		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply Feb 2015																	
levels	<table border="1"> <thead> <tr> <th>Water parameter</th> <th>Emission values associated with the</th> </tr> </thead> <tbody> <tr> <td>COD</td> <td>20 – 120</td> </tr> <tr> <td>BOD</td> <td>2 – 20</td> </tr> <tr> <td>Heavy metals (Cr, Cu, Ni, Pb, Zn)</td> <td>0.1 – 1</td> </tr> <tr> <td>Highly toxic heavy metals:</td> <td></td> </tr> <tr> <td>As</td> <td>&lt;0.1</td> </tr> <tr> <td>Hg</td> <td>0.01 – 0.05</td> </tr> <tr> <td>Cd</td> <td>&lt;0.1 – 0.2</td> </tr> <tr> <td>Cr(VI)</td> <td>&lt;0.1 – 0.4</td> </tr> </tbody> </table> <p>by applying a suitable combination of techniques mentioned in Sections 4.4.2.3 and 4.7. The techniques mentioned above in this section on ‘waste water management’ (also contribute to reach these values.</p>	Water parameter	Emission values associated with the	COD	20 – 120	BOD	2 – 20	Heavy metals (Cr, Cu, Ni, Pb, Zn)	0.1 – 1	Highly toxic heavy metals:		As	<0.1	Hg	0.01 – 0.05	Cd	<0.1 – 0.2	Cr(VI)	<0.1 – 0.4	<p>effluent for a further treatment off-site.</p> <p>Considering that this is a pre-treatment, the foreseen limit figures are:</p> <ul style="list-style-type: none"> <li>- Suspended solids: 1 kg/m<sup>3</sup></li> <li>- COD: 1,65 kg/m<sup>3</sup></li> <li>- BOD5: 0,78 kg/m<sup>3</sup></li> <li>- TKN: 0,182 kg/m<sup>3</sup></li> <li>- Ptotal: 0,008 kg/m<sup>3</sup></li> </ul>	
Water parameter	Emission values associated with the																				
COD	20 – 120																				
BOD	2 – 20																				
Heavy metals (Cr, Cu, Ni, Pb, Zn)	0.1 – 1																				
Highly toxic heavy metals:																					
As	<0.1																				
Hg	0.01 – 0.05																				
Cd	<0.1 – 0.2																				
Cr(VI)	<0.1 – 0.4																				
<b>Management of the process generated residues</b>	<p>BAT is to have a residue management plan (see Section 4.8.1) as part of the EMS including:</p> <ul style="list-style-type: none"> <li>• basic housekeeping techniques</li> <li>• internal benchmarking techniques (see Section 4.1.2.8).</li> </ul>	<p>Basic housekeeping techniques will be mentioned in the O&amp;M manual.</p> <p>Internal benchmarking techniques are for WSM attention.</p>																			
	<p>Maximise the use of re-usable packaging (drums, containers, IBCs, palettes, etc.) (see Section 4.8.1).</p>	<p>The use of re-usable packaging will be maximized, by returning to the suppliers, whenever possible.</p>																			
	<p>Re-use drums when they are in a good working state. In other cases, they are to be sent for appropriate treatment (see Section 4.8.1).</p>	<p>The use of re-usable packaging will be maximized, by returning to the suppliers, whenever possible.</p>																			
	<p>Keep a monitoring inventory of the waste on-site by using records of the amount of wastes received on-site and records of the wastes processed (see Section 4.8.3).</p>	<p>As per section 4.1.2.3 of BREF for Waste Treatment Industries, the application of some of these technics may not be possible when installation operates in a continuous basis. In fact, it will not be possible to keep track of each individual consignments of incoming waste since different consignments will be mixed together in the process tanks on a continuous basis. Nevertheless, records will be kept of incoming and outgoing waste consignment and this process will be under supervision of plant operation staff.</p>																			
	<p>Re-use the waste from one activity/treatment possibly as a feedstock for another (see Section 4.1.2.6).</p>	<p>Waste water will be re-used in the process. Just the excess will be discharged after pre-treatment.</p>																			

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply Feb 2015
Soil contamination	BAT is to provide and then maintain the surfaces of operational areas, including applying measures to prevent or quickly clear away leaks and spillages, and ensuring that maintenance of drainage systems and other subsurface structures is carried out (see Section 4.8.2).	<p>Containment and water proofing of surfaces will be provided.</p> <p>Separated water drainage and collection will be implemented for roof water, road water and process water.</p> <p>For road water, a treatment/security system will be in place, including:</p> <ul style="list-style-type: none"> <li>• a collection basin previous to the tanks;</li> <li>• silt trap and oil/water interceptor;</li> </ul> <p>gate/slucice valve to prevent entry into the tanks in case of a spillage.</p> <p>This mater will included in Hazard and Operability Assessment Study (HAZOP) which is still to be prepared.</p>		
	Utilise impermeable base and internal site drainage (see Section 4.1.4.6, 4.7.1 and 4.8.2).	<p>Containment and water proofing of surfaces will be provided.</p> <p>Separated water drainage and collection will be implemented for roof water, road water and process water.</p> <p>For road water, a treatment/security system will be in place, including:</p> <ul style="list-style-type: none"> <li>• a collection basin previous to the tanks;</li> <li>• silt trap and oil/water interceptor;</li> </ul> <p>gate/slucice valve to prevent entry into the tanks in case of a spillage.</p> <p>This mater will included in Hazard and Operability Assessment Study (HAZOP) which is still to be prepared.</p>		
	Reduce the installation site and minimise the use of underground vessels and pipework (see Section 4.8.2).	The reduction of the installation site area and minimisation of the use of underground vessels and pipework was taken in consideration at the design stage.		

**Part 2: BAT for specific types of waste treatments**

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>Biological treatments</b>	<p>BAT is to use the following techniques for storage and handling in biological systems (see Section 4.2.2):</p> <ul style="list-style-type: none"> <li>for less odour-intensive wastes, use automated and rapid action doors (opening times of the doors being kept to a minimum) in combination with an appropriate exhaust air collection device resulting in an under pressure in the hall</li> <li>for highly odour-intensive wastes, use closed feed bunkers constructed with a vehicle sluice</li> <li>house and equip the bunker area with an exhaust air collection device.</li> </ul>	<p><b>Odours control</b> Incoming waste will only be transferred into the system in the reception hall. Odour emissions will be minimized by using fast roller doors with air curtains and an air treatment system based on biofilters.</p> <p><b>Spillage of chemicals</b> Transfer of hazardous chemicals from drums into the system will be regulated by the O&amp;M manual, which will include procedures to avoid contamination of the environment and minimize risk of spillage during transfer. The principal hazardous chemicals foreseen to be used in the facility are listed below:</p> <ul style="list-style-type: none"> <li>Hydraulic oil</li> <li>Ferric Chloride</li> <li>Acetic Acid</li> <li>Sulphuric Acid</li> <li>Antifoaming Agent</li> <li>Polymer</li> </ul>		
	<p>Adjust the admissible waste types and separation processes according to the type of process carried out and the abatement technique applicable (e.g. depending on the content of non-biodegradable components) (see Section 4.2.3).</p>	<p>A mechanical pre-treatment step will be used to separate non-biodegradable components of waste and maximize the efficiency of the process. In addition, the plant and the abatement system has been designed specifically for the types of waste that will be accepted (MSW, BW and MANURE) in order to ensure the high performance of the plant.</p>		
	<p>Use the following techniques when applying anaerobic digestion (see Sections 4.2.4 and 4.2.5):</p> <ul style="list-style-type: none"> <li>application of a close integration between the process with the water management</li> <li>a recycling of the maximum amount of waste water to the reactor. See some operational issues that may appear when applying this technique in Section 4.2.4</li> </ul>	<p>Section 4.1.3.5 of BREF refers to the reuse of waste lime / acid for treatment, which are not applicable in this facility. Wastewater will be reused in the treatment process and will always be available as the production of wastewater is a necessary part of the process. Service water (from rain water runoff) also available if necessary.</p> <p>Wastewater will be reused in the treatment process (define as process water). Service water (from rain water runoff) will be used for specific needs, when higher quality water is required.</p>		

- operate the system under thermophilic digestion conditions. For certain types of wastes, thermophilic conditions cannot be reached (see Section 4.2.4)
- measure TOC, COD, N, P and Cl levels in the inlet and outlet flows. When a better control of the process is required, or a better quality of the waste OUT, more parameters are necessary for measuring and controlling
- maximise the production of biogas. This technique needs to consider the effect on the digestate and biogas quality.

Contractor technology use mesophilic digestion conditions.

Additional measures that will be taken in te inlet/outlet of the digester are: TS; VS; T; pH; Gas amount; CH4; CO2; O2; H2S

The plant has been designed to maximize the production of biogas.

Reduce the air emissions of the exhaust gas when using biogas as a fuel by restricting the emissions of dust, NOx, SOx, CO, H2S and VOC by using an appropriate combination of the following techniques (see Section 4.2.6):

- scrubbing the biogas with iron salts
- using de-NOx techniques such as SCR
- using a thermal oxidation unit
- using activated carbon filtration.

The proposed technology to reduce the H<sub>2</sub>S content in the biogas, and consequent additional emissions, is Biological Desulphurization. This process was included to reduce also the consumption of iron chloride and to prevent an unnecessary increase of salinity in the waste suspension.

Other technique will be the regulation of NOx-emissions by control of combustion chamber temperature (this regulation is available in CHP), namely:

- Measurement of the average temperature in the combustion chamber for each cylinder. This result in a quick regulation of the combustion chamber mixture, improving the efficiency of the motor.

Quick response of gas quality variation, getting the lowest emissions for a wide range of gas quality.

Improve the mechanical biological treatments (MBT) by (see Sections 4.2.2, 4.2.3, 4.2.8, 4.2.10, 4.6.23):

- using fully enclosed bioreactors
- avoiding anaerobic conditions during

Confirmed.

Anaerobic conditions are used only on digesters. In critical parts of the process, like

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aerobic treatment by controlling the digestion and the air supply (by using a stabilised air circuit) and by adapting the aeration to the actual biodegradation activity

suspension buffer (before digesters) and aeration tanks (after digesters) anaerobic conditions will be avoided by their own air supply.

The WWTP uses a nitrification/denitrification process that uses the aeration control to regulate its activity.

- using water efficiently

Confirmed - A contained drainage system will be in place inside the plant, driving all drainage from the different hall to an underground process water tank. This water will be used in the process.

- thermally insulating the ceiling of the biological degradation hall in aerobic processes

Wastewater will be reused in the treatment process (define as process water). Service water (from rain water runoff) will be used for specific needs, when higher quality water is required.

- minimising the exhaust gas production to levels of 2500 to 8000 Nm<sup>3</sup> per tonne. Levels below 2500 Nm<sup>3</sup> per tonne do not have been reported

Not applicable

In normal operation all gas produced will be combusted in CHP's. In case of CHP's maintenance of emergency situations, the gas produced shall be burned by the flare.

- guaranteeing a uniform feed

A uniform feed is important to the efficiency of gas production. This uniformity will be assured by the foreseen suspension buffer tank.

- recycling process waters or muddy residues within the aerobic treatment process to completely avoid water emissions. If waste water is generated, then this should be treated to reach the water emissions values mentioned previously

Not applicable as the digestion process is anaerobic. However, process waste water will be treated in the onsite WWTP and reused in the process.

- continuously learning of the connection between the controlled variables of biological degradation and the measured (gaseous) emissions

Confirmed.

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- reducing emissions of nitrogen compounds by optimising the C:N ratio

The C:N ratio is dependent on the composition of the incoming waste which cannot be changed by the operator. Nevertheless, Ammonia emissions will be treated in the biofilter scrubber, adding acid when necessary, depending of the pH.

**Emission levels for mechanical biological treatments**

Reduce the emissions from mechanical biological treatments to the following levels (see Section 4.2.12):

Parameter	Treated exhaust
Odour (ouE/m <sup>3</sup> )	<500 – 6000
NH <sub>3</sub> (mg/Nm <sup>3</sup> )	<1 – 20

For VOC and PM, see the generic BAT 41  
The TWG recognised that N<sub>2</sub>O (see Section 4.6.10) and Hg also needed this table, however not enough data were provided to validate values on

by using an appropriate combination of the following techniques (see Section 4.6):

- maintaining good housekeeping (related to BAT number 3)
- regenerative thermal oxidiser
- dust removal.

Reduction of emissions and foreseen limits:

Kindly specify levels for NH<sub>3</sub>.

The system considered for the plant includes an acid scrubber with the purpose to precipitate NH<sub>3</sub> to the indicated levels which will enable us to achieve odour levels as indicated in the table.

Air treatment system includes a general odour treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crashing area.

By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.

The specific NH<sub>3</sub> levels can only be obtained once the plant is in operation.

Foreseen limit of emissions:

Odour (OU<sub>E</sub>/m<sup>3</sup>): <500

Dust<=10mg/Nm<sup>3</sup>

Maintaining good housekeeping and dust removal will be implemented. Regenerative thermal oxidiser will not be used but biofilter system.

Reduce the emissions to water to the levels mentioned in “the water emissions values”. In addition, restrict the emissions to water of total nitrogen, ammonia, nitrate and nitrite as well (see Section 4.7.7 and the concluding remarks Chapter 7).

It is important to mention that this plant only provide a pre-treatment that prepares the effluent for a further treatment off-site.

Considering that this is a pre-treatment, the foreseen limit figures are:

- Suspended solids: 1 kg/m<sup>3</sup>
- COD: 1,65 kg/m<sup>3</sup>
- BOD<sub>5</sub>: 0,78 kg/m<sup>3</sup>
- TKN: 0,182 kg/m<sup>3</sup>

Ptotal: 0,008 kg/m<sup>3</sup>

**Physico-chemical treatments**

BAT is to apply the following techniques in physico-chemical reactors (see Section 4.3.1.2):

- clearly defining the objectives and the expected reaction chemistry for each treatment process

Find attached the updated information of main chemical reactions foreseen: App. 05 - Main chemical reactions.

Not applicable. Wastes accepted will be fully

- assessing each new set of reactions and proposed mixes of wastes and reagents in a laboratory-scale test prior to waste treatment  
compatible at any proportion, all non-hazardous.
- specifically designing and operating the reactor vessel so that it is fit for its intended purpose  
Confirmed.
- enclosing all treatment/reaction vessels and ensuring that they are vented to the air via an appropriate scrubbing and abatement system  
The tanks subject to important odour emissions will be closed and connected to the air treatment system.
- monitoring the reaction to ensure that it is under control and proceeding towards the anticipated result  
A program of analysis and verifications will be in place to check the status of the reaction. This program will be included in the O&M manual.
- preventing the mixing of wastes or other streams that contain metals and complexing agents at the same time (see Section 4.3.1.3).  
Is not foreseen the mixing of wastes in the plant except the MSW and MANURE in digestion process.

In addition to the generic parameters identified previously for waste water, additional parameters need to be identified for the physico-chemical treatment of waste waters. Some reference is given on this issue in the concluding remark Chapter 7.

Additional parameters to be measured: O<sub>2</sub>; pH; T; NO<sub>3</sub>; NO<sub>2</sub>; Phosphate (PO<sub>4</sub><sup>3-</sup>); NH<sub>4</sub>-N

Apply the following techniques for the neutralisation process (see Section 4.3.1.3)

- ensuring that the customary measurement methods are used
- separately storing the neutralised waste water
- performing a final inspection of the neutralised waste water after a sufficient storage time has elapsed.

Neutralisation of WW is not foreseen.

Apply the following techniques to aid precipitation of the metals in treatment processes (see Section 4.3.1.4):

- adjusting the pH to the point of minimum solubility where the metals

Not applicable. There are no precipitation of metals foreseen in the process.

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will precipitate

- avoiding the input of complexing agents, chromates and cyanides
- avoiding organic materials that may interfere with precipitation from entering the process
- allowing the resulting treated waste to clarify by decantation when possible, and/or by the addition of other dewatering equipment
- using sulphidic precipitation if complex agents are present. This technique may increase the sulphide concentration in the treated waste water.

Apply the following techniques to break-up emulsions (see Section 4.3.1.5):

- testing for the presence of cyanides in the emulsions to be treated. If cyanides are present, the emulsions need a special pre-treatment first
- setting up simulated laboratory tests.

Not applicable. Braking-up of emulsions are not foreseen in the process.

Apply the following techniques to oxidation/reduction (see Section 4.3.1.6):

- abating the air emissions generated during the oxidation/reduction
- having safety measures and gas detectors in place (e.g. suitable for detecting HCN, H<sub>2</sub>S, NO<sub>x</sub>).

Not applicable. Oxidation/reduction are not foreseen in the process.

Apply the following techniques to waste waters containing cyanides (see Section 4.3.1.7):

- destroying the cyanides by oxidation
- adding caustic soda in excess to prevent a decrease in pH
- avoiding the mixing of cyanide wastes with acidic compounds
- monitoring the progress of the reaction using electropotentials.

Not applicable. These techniques are not foreseen in the WW pre-treatment process foreseen onsite.

Apply the following techniques to waste waters containing chromium (VI) compounds (see Section 4.3.1.8):

- avoiding the mixing of Cr(VI) wastes with other wastes

Not applicable. These techniques are not foreseen in WW pre-treatment process foreseen onsite.

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- reducing Cr(VI) to Cr(III)
- precipitating the trivalent metal.

Apply the following techniques to waste waters containing nitrites (see Section 4.3.1.9):

- avoiding mixing nitrite wastes with other wastes
- checking and avoiding nitrous fumes during the oxidation/acidification treatment of nitrites.

Not applicable. These techniques are not foreseen in WW pre-treatment process foreseen onsite.

Apply the following techniques to waste waters containing ammonia (see Section 4.3.1.11):

- using a dual column air stripping system with an acidic scrubber for waste with ammonia solutions up to 20 w/w-%
- recovering the ammonia in the scrubbers and returning it to the process prior to the settlement stage
- removing the ammonia removed in the gas phase by scrubbing the waste with sulphuric acid to produce ammonium sulphate
- extending any air sampling for ammonia in exhaust stacks or filter press areas to cover the VOCs in filtration and dewatering (see Section 4.3.1.12).

Not applicable. These techniques are not foreseen in WW pre-treatment process foreseen onsite.

Link the air space above filtration and dewatering processes to the main abatement system of the plant (see Section 4.3.1.12).

A dedicated air extraction to the main abatement system of the plant is foreseen over the microstrainers to be installed in MT and AD plants.

Add flocculation agents to the sludge and waste water to be treated, to accelerate the sedimentation process and to facilitate the further separation of solids (see Section 4.3.1.16 for some applicability restrictions identified). To avoid use of flocculation agents, evaporation is better in those cases where it is economically viable (see Section 4.7.6.1).

Evaporation is not foreseen.  
Flocculation agent will be used for dewatering purposes.

Apply rapid cleaning and steam- or high pressure water jet cleaning of the filter

Confirmed. High pressure water jet will be used for cleaning of microstrainers and

	apertures of the sieving processes (see Section 4.3.1.17).	thickeners filters.
<b>Physico-chemical treatment of solid wastes</b>	BAT is to promote the insolubilisation of amphoteric metals, and to reduce the leaching of toxic soluble salts by a suitable combination of water washing, evaporation, recrystallisation and acid extraction (see Section 4.3.2.1, 4.3.2.8, 4.3.2.9) when immobilisation is used to treat solid waste containing hazardous compounds for land filling.	Not applicable. The plant is a Mechanical-Biological Treatment Plant and not a Physico-Chemical Treatment Plant.
	Test the leachability of inorganic compounds, by using the standardised CEN leaching procedures and by applying the appropriate testing level: basic characterisation, compliance testing or on-site verification (see Section 4.3.2.2).	Not applicable. The plant is a Mechanical-Biological Treatment Plant and not a Physico-Chemical Treatment Plant.
	Restrict the acceptance of wastes to be treated by solidification/immobilisation treatment to those not containing high levels of VOCs, odorous components, solid cyanides, oxidising agents, chelating agents, high TOC wastes and gas cylinders (see Section 4.3.2.3).	Not applicable. The plant is a Mechanical-Biological Treatment Plant and not a Physico-Chemical Treatment Plant.
	Apply control and enclosure techniques for loading/unloading and enclosed conveyor systems (see Section 4.3.2.3).	Not applicable. The plant is a Mechanical-Biological Treatment Plant and not a Physico-Chemical Treatment Plant.
	Have an abatement system(s) in place to handle the flow of air, as well as the peak loadings associated with charging and unloading (see Section 4.3.2.3).	Not applicable. The plant is a Mechanical-Biological Treatment Plant and not a Physico-Chemical Treatment Plant.
	Use at least a solidification, vitrification, melting or fusion process before landfilling solid waste according to techniques in Sections from 4.3.2.4 to 4.3.2.7.	Not applicable. The plant is a Mechanical-Biological Treatment Plant and not a Physico-Chemical Treatment Plant.
<b>Re-refining of waste oils</b>	BAT is to operate a careful control of the incoming materials supported by analytical equipment (viscometry, infrared, chromatography and mass spectrometry as appropriate), laboratories and resources (see Section 4.1.1.1).	Not applicable. No re-refining of waste oils is foreseen.

Check at least for chlorinated solvents and PCBs (see Sections 4.1.1.1 and 4.4.1.2). Not applicable. No re-refining of waste oils is foreseen.

Use condensation as a treatment for the gas phase of the flash distillation unit (see Section 4.6.8). Not applicable. No re-refining of waste oils is foreseen.

Have vapour return lines for loading and unloading vehicles, routing all vents to a thermal oxidiser/incinerator or an activated carbon adsorption installation (see Sections 4.1.4.6, 4.6.7 and 4.6.14). Not applicable. No re-refining of waste oils is foreseen.

Direct vent streams to a thermal oxidiser with waste gas treatment if chlorinated species are present in the vent stream. If high levels of chlorinated species are present then condensation followed by caustic scrubbing and an activated carbon guard bed is the preferred treatment path (see Section 4.6). Not applicable. No re-refining of waste oils is foreseen.

Utilise a thermal oxidation at 850 °C with a two seconds residence time for the vacuum distillation vent of vacuum generators or for the air from process heaters (see Section 4.6). Not applicable. No re-refining of waste oils is foreseen.

Use a highly efficient vacuum system (see Section 4.4.1.1). Not applicable. No re-refining of waste oils is foreseen.

Use the residues from vacuum distillation or thin film evaporators as asphalt products (see Section 4.4.1.15). Not applicable. No re-refining of waste oils is foreseen.

Use a re-refining process of waste oil which can achieve a yield higher than 65 % on a dry basis (see Sections from 4.4.1.1 to 4.4.1.12). Not applicable. No re-refining of waste oils is foreseen.

**Emission levels for re-refining of waste oils**

Achieve the following values in the discharged waste water from the re-refining unit (see Section 4.4.1.14): Not applicable. No re-refining of waste oils is foreseen.

Waste water parameter	Concentration
Hydrocarbons	<0.01 – 5
Phenols	0.15 – 0.
For other water parameters, refer to BAT number 56 in the Generic	

by using a suitable combination of process-integrated techniques and/or primary,

	secondary, biological and finishing treatments (see Sections 4.4.1.14 and 4.7).	
<b>Treatment of waste solvent</b>	BAT is to operate a careful control of the incoming materials as supported by analytical equipment, laboratories and resources (see Section 4.1.1.1).	Not applicable. No treatment of waste solvent is foreseen.
	Evaporate the residue from the distillation columns and to recuperate the solvents (see Section 4.4.2.4).	Not applicable. No treatment of waste solvent is foreseen.
<b>Regeneration of waste catalyst</b>	BAT is to use bag filters to abate particulates from the fumes generated during the regeneration process (see Sections 4.4.3 and 4.6.5).	Not applicable. No regeneration of waste catalyst is foreseen.
	Use a SO <sub>x</sub> abatement system (see Section 4.4.3.3).	Not applicable. No regeneration of waste catalyst is foreseen.
<b>Regeneration of waste activated carbon</b>	BAT is to have an effective quality control procedure in place to ensure that the operator can differentiate between the carbon used for potable water or food grade carbon and the rest of spent carbons (the so-called 'industrial carbons') (see Section 4.4.4.2).	Not applicable. No regeneration of waste activated carbon is foreseen.
	Require a written undertaking from customers indicating what the activated carbon has been used for (see Section 4.1.2.3).	Not applicable. No regeneration of waste activated carbon is foreseen.
	Utilise an indirect fired kiln for industrial carbons –it may be argued that this could equally be applied to potable water carbons. However, limits on capacity and corrosion may deem that only multiple hearth or direct fired rotary kilns may be used (see Section 4.4.4.1).	Not applicable. No regeneration of waste activated carbon is foreseen.
	Utilise an afterburner with a minimum of 1100 °C, two seconds residence time and 6 % excess oxygen for the regeneration of industrial carbons where refractory halogenated or other thermally resistant substances are likely to be present. In other cases, less stringent thermal conditions are sufficient (see Section 4.4.4.2).	Not applicable. No regeneration of waste activated carbon is foreseen.
	Utilise an afterburner with a minimum heating	Not applicable. No regeneration of waste

	temperature of 850 °C, two seconds residence time and 6 % excess oxygen for potable water and food grade active carbons (see Section 4.4.4.2).	activated carbon is foreseen.
	Apply a flue-gas treatment train consisting of quench and/or venturi and aqueous scrubbing sections, followed by an induced draft fan (see Section 4.4.4.2).	Not applicable. No regeneration of waste activated carbon is foreseen.
	Utilise a caustic or soda ash scrubbing solutions to neutralise acid gases for industrial carbon plants (see Section 4.4.4.2).	Not applicable. No regeneration of waste activated carbon is foreseen.
	Have a WWTP containing an appropriate combination of flocculation, settlement, filtration and pH adjustment for the treatment of potable water carbons. For effluents of industrial carbons, applying additional treatments (e.g. metal hydroxide precipitation, sulphide precipitation) are also considered BAT (see Section 4.4.4.3).	Not applicable. No regeneration of waste activated carbon is foreseen.
<b>Preparation of waste to be used as fuel</b>	BAT is to try to have a close relationship with the waste fuel user in order that a proper transfer of the knowledge of the waste fuel composition is carried out (see Section 4.5.1).	At this point this cannot be investigated since management of RDF is governed through tenders.
	Have a quality assurance system to guarantee the characteristics of the waste fuel produced (see Section 4.5.1).	The RDF quality assurance is accomplish with a mechanical process that separates the RDF from another fractions (recyclable and Contaminants). This is accomplish starting with a Shredder/Pre-shredder to guarantee the Waste size entrance on the mechanical process. After the waste pass thought a sieve drum to take out the organic, sand, stones, glass, etc...The waste that have potential to produce RDF is between a minimum of 30mm and maximum 250mm size, this is accomplish with the mesh of the sieve drum. After the sieve drum the waste pass thought metal separators, and Eddy current separator, to guarantee metal free waste. After the metal separators the Waste pass through the wind shifter to remove the heavy fraction that contains heavy and large inert (stones, glass, etc...). In the end there is an optical separation

		of the waste (without all this contaminants described before, and with a size below 300mm) to recover some of the Recyclable materials, that have market Value. The fraction left, after all of this mechanical treatments described before, is the waste with potential to be used as RDF. In this mechanical process there are also sorting cabins, to assure the control of contaminants and large pieces, that are not recyclable or with potential to produce RDF. This way we can assure the best quality of RDF in terms of NCV, Metal content, particle size and organic free.
	Manufacture different type of waste fuels according to the type of user (e.g. cement kilns, different power plants), to the type of furnace (e.g. grate firing, blow feeding) and to the type of waste used to manufacture the waste (e.g. hazardous waste, municipal solid waste) (see Section 4.5.2).	Not applicable. Only one type will be produced.
	<i>When producing waste fuel from hazardous waste, use activated carbon treatment for low contaminated water and thermal treatment for highly polluted water (see Sections 4.5.6 and 4.7). In this context, thermal treatment relates to any thermal treatment in Section 4.7.6 or incineration which is not covered in this document.</i>	Not applicable. Hazardous waste input in the plant is not foreseen.
	<i>When producing waste fuel from hazardous waste, ensure correct follow-up of the rules concerning electrostatic and flammability hazards for safety reasons (see Sections 4.1.2.7 and 4.1.7).</i>	Not applicable. Hazardous waste input in the plant is not foreseen.
<b>Preparation of solid waste fuels from non-hazardous waste</b>	BAT is to visually inspect the incoming waste to sort out the bulky metallic or non-metallic parts. The purpose is to protect the plant against mechanical destruction (see Section 4.1.1.3 and this is also related to BAT 8.e).	Grabber operator, when proceeding with the waste input to the plant shall visually inspect the incoming waste to sort out the bulky metallic or non-metallic parts.
	Use magnetic ferrous and non-ferrous metal separators. The purpose is to protect the pelletisers as well as fulfill the requirements of the final users (see Sections 4.5.3.3 and 4.5.3.4).	Confirmed.

Make use of the NIR technique for the sorting out of plastics. The purpose is the reduction of organic chlorine and some metals which are part of the plastics (see Section 4.5.3.10).	Confirmed.
Use a combination of shredder systems and pelletisers suitable for the preparation of the specified size waste fuel (see Sections 4.5.3.1 and 4.5.3.12).	Not foreseen.
<i>For some installations preparing solid waste fuels from source-separated waste streams, the use of some or all of the above-mentioned techniques may not be necessary to comply with BAT (see Section 4.5.3.1).</i>	Not applicable

## B. Emissions from storage

### Part 1: Storage of liquids and liquefied gases

#### 1.1 Tanks

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>General principles to prevent and reduce emissions</b> Tank design	<p>BAT for a proper design is to take into account at least the following:</p> <ul style="list-style-type: none"> <li>• the physico-chemical properties of the substance being stored</li> <li>• how the storage is operated, what level of instrumentation is needed, how many operators are required, and what their workload will be</li> <li>• how the operators are informed of deviations from normal process conditions (alarms)</li> <li>• how the storage is protected against deviations from normal process conditions (safety instructions, interlock systems, pressure relief devices, leak detection and containment, etc.)</li> <li>• what equipment has to be installed, largely taking account of past experiences of the product (construction materials, valve quality,</li> </ul>	Confirmed.		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>etc.)</p> <ul style="list-style-type: none"> <li>• which maintenance and inspection plan needs to be implemented and how to ease the maintenance and inspection work (access, layout, etc.)</li> <li>• how to deal with emergency situations (distances to other tanks, facilities and to the boundary, fire protection, access for emergency services such as the fire brigade, etc.).</li> </ul> <p>See Annex 8.19 for a typical checklist.</p>			
<p><b>General principles to prevent and reduce emissions</b> <b>Inspection and maintenance</b></p>	<p>BAT is to apply a tool to determine proactive maintenance plans and to develop risk-based inspection plans such as the risk and reliability based maintenance approach; see Section 4.1.2.2.1.</p> <p>Inspection work can be divided into routine inspections, in-service external inspections and out-of-service internal inspections and are described in detail in Section 4.1.2.2.2.</p>	<p>To be included as part of the O&amp;M Manual.</p>		
<p><b>General principles to prevent and reduce emissions</b> <b>Location and lay-out</b></p>	<p>For building new tanks it is important to select the location and the layout with care, e.g. water protection areas and water catchment areas should be avoided whenever possible. See Section 4.1.2.3.</p> <p>BAT is to locate a tank operating at, or close to, atmospheric pressure aboveground. However, for storing flammable liquids on a site with restricted space, underground tanks can also be considered. For liquefied gases, underground, mounded storage or spheres can be considered, depending on the storage volume.</p>	<p>Bundling or double wall tanks will be installed for all above ground tank. Underground tanks will be built in concrete.</p> <p>Where practicable this has been carried out, for example the suspension buffer, surplus water tank, the digester tanks, and the aeration tanks.</p> <p>However, in some cases it the use of tanks below ground has been preferred, for example, the WW pre-treatment tank is an open tank below ground level, the water reservoirs are underground (as is normal practice in Malta), the process water tanks.</p> <p>The only pressurised tanks will be the gas bubble, the compressed air tanks, and the pressurised water tanks (used for pressure cleaning).</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>General principles to prevent and reduce emissions</b> <b>Tank colour</b>	BAT is to apply either a tank colour with a reflectivity of thermal or light radiation of at least 70 %, or a solar shield on aboveground tanks which contain volatile substances, see Section 4.1.3.6 and 4.1.3.7 respectively.	<p>Nevertheless the use of tanks below ground or under pressure is not incompatible with BAT, as suggested in the below sections:</p> <ul style="list-style-type: none"> <li>- Sections 3.1.11 and 3.1.8 refer to horizontal tanks. No horizontal tanks are foreseen at the facility.</li> <li>- Pressurised storage is only foreseen in the gas bubble, the compressed air tanks, and the pressurised water tanks (filtered water).</li> </ul> <p>However, the gas / air will not be liquefied, therefore no liquid emissions are expected (considering that section 4.1.4 in the BREF refers to liquid emissions).</p> <p>No vapour treatment is foreseen for the gas, since the gas will be combusted in the CHP plant under normal operation.</p>		
<b>General principles to prevent and reduce emissions</b> <b>Emissions minimization principle in tank storage</b>	BAT is to abate emissions from tank storage, transfer and handling that have a significant negative environmental effect, as described in Section 4.1.3.1. This is applicable to large storage facilities allowing a certain time frame for implementation.	<p>The large digester tanks will have an aluminium cladding, whereas the non-insulated tanks will be painted a light grey (however these tanks are at a tank pit, and so more sheltered from sunlight).</p> <p>The chemical storage tanks placed outside are double walled and will be covered by a roof for shading.</p>	<p>No hazardous wastes will be handles within the facility and therefore emissions are minimal.</p>	
<b>General principles to</b>	On sites where significant VOC emissions are to be expected, BAT includes calculating the	Not applicable. No significant VOC emissions are expected.		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>prevent and reduce emissions</b> <b>Monitoring of VOC</b>	VOC emissions regularly. The calculation model may occasionally need to be validated by applying a measurement method. See Section 4.1.2.2.3. <sup>i</sup>			
<b>General principles to prevent and reduce emissions</b> <b>Dedicating systems</b>	<p>BAT is to apply dedicated systems; see Section 4.1.4.4.</p> <p>Dedicated systems are generally not applicable on sites where tanks are used for short to medium-term storage of different products.</p>	<p>Dedicated systems will be applied, since the range of waste to be accepted will be restricted to MSW, BW and manure. Additionally, different tanks will be dedicated to specific processes or storage of specific wastes / materials.</p>		
<b>Tank specific considerations</b> <b>Open top tanks</b>	<p>Open top tanks are used for the storage of, e.g. manure slurry in agricultural premises and water and other non-flammable or non-volatile liquids in industrial facilities, see Section 3.1.1.</p> <p>If emissions to air occur, BAT is to cover the tank by applying:</p> <ul style="list-style-type: none"> <li>• a floating cover, see Section 4.1.3.2</li> <li>• a flexible or tent cover, see Section 4.1.3.3, or</li> <li>• a rigid cover, see Section 4.1.3.4.</li> </ul> <p>Additionally, with an open top tank covered with a flexible, tent or a rigid cover, a vapour treatment installation can be applied to achieve an additional emission reduction, see Section 4.1.3.15. The type of cover and the necessity for applying the vapour treatment system depend on the substances stored and must be decided on a case-by-case basis.</p> <p>To prevent deposition that would call for an additional cleaning step, BAT is to mix the stored substance (e.g. slurry), see Section 4.1.5.1.</p>	<p>The only open top tank within the facility will be the WW pre-treatment tank; however no significant odour emissions are expected at this stage that require covering or abatement.</p>		
<b>Tank specific considerations</b> <b>External floating roof tank</b>	<p>External floating roof tanks are used for the storage of, e.g. crude oil; see Section 3.1.2.</p> <p>The BAT associated emission reduction level for a large tank is at least 97 % (compared to a</p>	<p>Not applicable. No external floating roof tanks are foreseen.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>fixed roof tank without measures), which can be achieved when over at least 95 % of the circumference the gap between the roof and the wall is less than 3.2 mm and the seals are liquid mounted, mechanical shoe seals. By installing liquid mounted primary seals and rim mounted secondary seals, a reduction in air emissions of up to 99.5 % (compared to a fixed roof tank without measures) can be achieved. However, the choice of seal is related to reliability, e.g. shoe seals are preferred for longevity and, therefore, for high turnovers. See Section 4.1.3.9.</p> <p>BAT is to apply direct contact floating roofs (double-deck), however, existing non-contact floating roofs (pontoon) are also BAT. See Section 3.1.2.</p> <p>Additional measures to reduce emissions are (see Section 4.1.3.9.2):</p> <ul style="list-style-type: none"> <li>• applying a float in the slotted guide pole</li> <li>• applying a sleeve over the slotted guide pole, and/or</li> <li>• applying ‘socks’ over the roof legs.</li> </ul> <p>A dome can be BAT for adverse weather conditions, such as high winds, rain or snowfall. See Section 4.1.3.5.</p> <p>For liquids containing a high level of particles (e.g. crude oil), BAT is to mix the stored substance to prevent deposition that would call for an additional cleaning step, see Section 4.1.5.1.</p>			
<p><b>Tank specific considerations</b> <b>Fixed roof tanks</b></p>	<p>Fixed roof tanks are used for the storage of flammable and other liquids, such as oil products and chemicals with all levels of toxicity, see Section 3.1.3.</p> <p>For the storage of volatile substances which are toxic (T), very toxic (T+), or carcinogenic, mutagenic and reproductive toxic (CMR) categories 1 and 2 in a fixed roof tank, BAT is to apply a vapour treatment installation.<sup>ii</sup></p>	<p>Fixed roof tanks are planned in various parts of the process, including the digesters, the aeration tanks, the suspension buffer, the surplus water tank, etc.</p> <p>No storage of volatile substances which are toxic (T), very toxic (T+), or CMR is planned.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>For other substances, BAT is to apply a vapour treatment installation, or to install an internal floating roof (see Sections 4.1.3.15 and 4.1.3.10 respectively). Direct contact floating roofs and non-contact floating roofs are BAT. In the Netherlands, the condition for when to apply these BAT is when the substance has a vapour pressure (at 20 °C) of 1 kPa and the tank has a volume of <math>\geq 50 \text{ m}^3</math>. In Germany, the condition for when to apply these BAT is when the substance has a vapour pressure (at 20 °C) of 1.3 kPa and the tank has a volume of <math>\geq 300 \text{ m}^3</math>.</p> <p>For tanks <math>&lt; 50 \text{ m}^3</math>, BAT is to apply a pressure relief valve set at the highest possible value consistent with the tank design criteria.</p> <p>The selection of the vapour treatment technology is based on criteria such as cost, toxicity of the product, abatement efficiency, quantities of rest-emissions and possibilities for product or energy recovery, and has to be decided case-by-case. The BAT associated emission reduction is at least 98 % (compared to a fixed roof tank without measures). See Section 4.1.3.15.</p> <p>The achievable emission reduction for a large tank using an internal floating roof is at least 97 % (compared to a fixed roof tank without measures), which can be achieved when over at least 95 % of the circumference of the gap between the roof and wall is less than 3.2 mm and the seals are liquid mounted, mechanical shoe seals. By applying liquid mounted primary seals and rim mounted secondary seals, even higher emission reductions can be achieved. However, the smaller the tank and the smaller the number of turnovers the less effective the floating roof is, see Annex 8.22 and Annex 8.23 respectively.</p> <p>Also the case studies in Annex 8.13 show that</p>	<p>Not applicable. No hazardous waste is foreseen.</p> <p>Air treatment system includes a general odour treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crashing area.</p> <p>By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.</p> <p>Foreseen limit of emissions:  Odour (OUE/m3): &lt;500  Dust&lt;=10mg/Nm3</p> <p>Pressure relief valves will be installed as necessary to the highest safe value consistent with the tank design.</p> <p>Not applicable. No internal floating roof tanks are foreseen.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>achievable emission reductions depend on several issues such as the substance that is actually stored, meteorological circumstances, number of turnovers and diameter of the tank. The calculations show that with an internal floating roof an emission reduction in the range 62.9 – 97.6 % can be achieved (compared to a fixed roof tank without measures); where 62.9 % refers to a tank of 100 m<sup>3</sup> equipped with only primary seals and 97.6 % refers to a tank of 10263 m<sup>3</sup> equipped with primary and secondary seals.</p> <p>For liquids containing a high level of particles (e.g. crude oil) BAT is to mix the stored substance to prevent deposition that would call for an additional cleaning step, see Section 4.1.5.1.</p>		<p>Kindly clarify additional measures employed in order to prevent sedimentation e.g. design of agitating paddles.</p>	
<p><b>Tank specific considerations Atmospheric horizontal tanks</b></p>	<p>Atmospheric horizontal tanks are used for the storage of flammable and other liquids, such as oil products and chemicals in all levels of flammability and toxicity, see Section 3.1.4. Horizontal tanks are different to vertical tanks, e.g. since they can inherently operate under higher pressures.</p> <p>For the storage of volatile substances which are toxic (T), very toxic (T+), or CMR categories 1 and 2 in an atmospheric horizontal tank, BAT is to apply a vapour treatment installation.<sup>iii</sup></p> <p>For other substances, BAT is to do all, or a combination, of the following techniques, depending on the substances stored:</p> <ul style="list-style-type: none"> <li>• apply pressure vacuum relief valves; see Section 4.1.3.11</li> <li>• up rate to 56 mbar; see Section 4.1.3.11</li> <li>• apply vapour balancing; see Section 4.1.3.13</li> <li>• apply a vapour holding tank, see Section</li> </ul>	<p>Not applicable. No horizontal tanks are foreseen.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>4.1.3.14, or</p> <ul style="list-style-type: none"> <li>• apply vapour treatment; see Section 4.1.3.15.</li> </ul> <p>The selection of the vapour treatment technology has to be decided on a case-by-case basis.</p>			
<b>Tank specific considerations</b> <b>Pressurised storage</b>	<p>Pressurised storage is used for storing all categories of liquefied gases, from non-flammable up to flammable and highly toxic. The only significant emissions to air from normal operation are from draining.</p> <p>BAT for draining depends on the tank type, but may be the application of a closed drain system connected to a vapour treatment installation, see Section 4.1.4.</p> <p>The selection of the vapour treatment technology has to be decided on a case-by-case basis.</p>	<p>Pressurised storage is only foreseen in the gas bubble, the compressed air tanks, and the pressurised water tanks (filtered water).</p> <p>However, the gas / air will not be liquefied, therefore no liquid emissions are expected (considering that section 4.1.4 in the BREF refers to liquid emissions).</p> <p>No vapour treatment is foreseen for the gas, since the gas will be combusted in the CHP plant under normal operation.</p>		
<b>Tank specific considerations</b> <b>Lifter roof tanks</b>	<p>For emissions to air, BAT is to (see Sections 3.1.9 and 4.1.3.14):</p> <ul style="list-style-type: none"> <li>• apply a flexible diaphragm tank equipped with pressure/vacuum relief valves, or</li> <li>• apply a lifter roof tank equipped with pressure/vacuum relief valves and connected to a vapour treatment installation.</li> </ul> <p>The selection of the vapour treatment technology has to be decided on a case-by-case basis.</p>	<p>Not applicable. No variable vapour space tanks are foreseen.</p>		
<b>Tank specific considerations</b> <b>Refrigerated tanks</b>	<p>There are no significant emissions from normal operation, see Section 3.1.10.</p>	<p>Not applicable. No refrigerated tanks are foreseen.</p>		
<b>Tank specific considerations</b> <b>Underground and mounded tanks</b>	<p>Underground and mounded tanks are used especially for flammable products, see Sections 3.1.11 and 3.1.8 respectively.</p> <p>For the storage of volatile substances which are toxic (T), very toxic (T+), or CMR categories 1 and 2 in an underground or mounded tank, BAT is to apply a vapour</p>	<p>Not applicable. Sections 3.1.11 and 3.1.8 refer to horizontal tanks. No horizontal tanks are foreseen at the facility.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>treatment installation.<sup>iv</sup></p> <p>For other substances, BAT is to do all, or a combination, of the following techniques, depending on the substances stored:</p> <ul style="list-style-type: none"> <li>• apply pressure vacuum relief valves; see Section 4.1.3.11</li> <li>• apply vapour balancing; see Section 4.1.3.13</li> <li>• apply a vapour holding tank, see Section 4.1.3.14, or</li> <li>• apply vapour treatment; see Section 4.1.3.15.</li> </ul> <p>The selection of the vapour treatment technology has to be decided on a case-by-case basis.</p>			
<p><b>Preventing incidents and (major) accidents</b> <b>Leakage due to corrosion and/or erosion</b></p>	<p>Corrosion is one of the main causes of equipment failure and can occur both internally and externally on any metal surface, see Section 4.1.6.1.4. BAT is to prevent corrosion by:</p> <ul style="list-style-type: none"> <li>• selecting construction material that is resistant to the product stored</li> <li>• applying proper construction methods</li> </ul> <ul style="list-style-type: none"> <li>• preventing rainwater or groundwater entering the tank and if necessary, removing water that has accumulated in the tank</li> </ul> <ul style="list-style-type: none"> <li>• applying rainwater management to bund drainage</li> </ul> <ul style="list-style-type: none"> <li>• applying preventive maintenance, and</li> <li>• where applicable, adding corrosion inhibitors, or applying cathodic protection on the inside of the tank.</li> </ul>	<p>The tank type, construction materials and methods have been selected following a consideration of the type of materials to be stored within the tanks.</p> <p>The underground tanks will be concreted.</p> <p>Glass-fused steel (Trifusion) is being used for corrosion protection of all steel tanks.</p> <p>Fixed roof tanks will be used, with the exception of the wastewater pre-treatment tank.</p> <p>The bund for the digester pits will be drained manually after a visual check.</p> <p>This will be included in the O&amp;M Manual.</p>	<p>Not applicable. All underground tanks will be constructed of concrete (not steel).</p>	
	<p>Additionally for an underground tank, BAT is</p>			

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>to apply to the outside of the tank:</p> <ul style="list-style-type: none"> <li>• a corrosion-resistant coating</li> <li>• plating, and/or</li> <li>• a cathodic protection system.</li> </ul> <p>Stress corrosion cracking (SCC) is a specific problem for spheres, semi-refrigerated tanks and some fully refrigerated tanks containing ammonia. BAT is to prevent SCC by:</p> <ul style="list-style-type: none"> <li>• stress relieving by post-weld heat treatment, see Section 4.1.6.1.4, and</li> <li>• applying a risk based inspection as described in Section 4.1.2.2.1.</li> </ul>	<p>Not applicable. The gas bubble (sphere) will be constructed of PVC, not steel.</p>		
<p><b>Preventing incidents and (major) accidents</b> <b>Operational procedures and instrumentation to prevent overfill</b></p>	<p>BAT is to implement and maintain operational procedures – e.g. by means of a management system – as described in Section 4.1.6.1.5, to ensure that:</p> <ul style="list-style-type: none"> <li>• high level or high pressure instrumentation with alarm settings and/or auto closing of valves is installed</li> <li>• proper operating instructions are applied to prevent overfill during a tank filling operation, and</li> <li>• sufficient ullage is available to receive a batch filling.</li> </ul> <p>A standalone alarm requires manual intervention and appropriate procedures, and automatic valves need to be integrated into the upstream process design to ensure no consequential effects of closure. The type of alarm to be applied has to be decided for every single tank. See Section 4.1.6.1.6.</p>	<p>High level sensors and alarms will be installed on the main tanks, and included as part of the Control System. In general, automatic pump shutdown (accompanied by shutoff valves where applicable) will be available, kicking in when the high-high level alarm is reached.</p> <p>Procedures will be included in the O&amp;M Manual.</p>		
<p><b>Preventing incidents and (major) accidents</b> <b>Instrumentation and automation to detect leakage</b></p>	<p>The four different basic techniques that can be used to detect leaks are:</p> <ul style="list-style-type: none"> <li>• release prevention barrier system</li> <li>• inventory checks</li> <li>• acoustic emission method</li> <li>• soil vapour monitoring.</li> </ul> <p>BAT is to apply leak detection on storage</p>	<p>Site containment is included:</p> <ul style="list-style-type: none"> <li>• In the halls, potentially contaminated drainage is collected in dedicated process waste water tank to be used for the process;</li> <li>• The digesters, suspension buffer and aeration tanks are placed in a bund;</li> <li>• In the other outside areas, potentially</li> </ul>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	tanks containing liquids that can potentially cause soil pollution. The applicability of the different techniques depends on the tank type and is discussed in detail in Section 4.1.6.1.7.	contaminated run-off water is diverted to underground reservoirs, fitted with a silt trap and oil-water interceptor to ensure that clean water enter the reservoirs; Chemicals are stored within dedicated bounded rooms. Chemical tanks placed in the outside have their own bund or double wall.		
<b>Preventing incidents and (major) accidents</b> <b>Risk-based approach to emissions to soil below tanks</b>	<p>The risk-based approach to emissions to soil from an aboveground flat-bottom and vertical, storage tank containing liquids with a potency to pollute soil, is that soil protection measures are applied at such a level that there is a ‘negligible risk’ for soil pollution because of leakage from the tank bottom or from the seal where the bottom and the wall are connected. See Section 4.1.6.1.8 where the approach and the risk levels are explained.</p> <p>BAT is to achieve a ‘negligible risk level’ of soil pollution from bottom and bottom-wall connections of aboveground storage tanks. However, on a case-by-case basis, situations might be identified where an ‘acceptable risk level’ is sufficient.</p>	<p>Chemical tanks will have double skins or bund. Large tanks with double skins will have interstitial leak detection.</p> <p>Tanks in the tank pit are built directly onto a 400 mm thick concrete foundation underlain with a 4mm thick polyester reinforced membrane that extends to cover the sides of the bund. The chemical tanks are also laid on top of a concrete foundation.</p> <p>This results in a negligible risk of soil pollution.</p>		
<b>Preventing incidents and (major) accidents</b> <b>Soil protection around tanks - containment</b>	<p>BAT for aboveground tanks containing flammable liquids or liquids that pose a risk for significant soil pollution or a significant pollution of adjacent watercourses is to provide secondary containment, such as:</p> <ul style="list-style-type: none"> <li>• tank bunds around single wall tanks; see Section 4.1.6.1.11</li> </ul>	<p>Site containment is included:</p> <ul style="list-style-type: none"> <li>• In the halls, potentially contaminated drainage is collected in dedicated process waste water tank to be used for the process;</li> <li>• The digesters, suspension buffer and aeration tanks are placed in a bund;</li> <li>• In the other outside areas, potentially</li> </ul>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<ul style="list-style-type: none"> <li>• double wall tanks; see Section 4.1.6.1.13</li> <li>• cup-tanks; see Section 4.1.6.1.14</li> <li>• double wall tanks with monitored bottom discharge; see Section 4.1.6.1.15.</li> </ul> <p>For building new single walled tanks containing liquids that pose a risk for significant soil pollution or a significant pollution of adjacent watercourses, BAT is to apply a full, impervious, barrier in the bund, see Section 4.1.6.1.10.</p> <p>For existing tanks within a bund, BAT is to apply a risk-based approach, considering the significance of risk from product spillage to the soil, to determine if and which barrier is best applicable. This risk-based approach can also be applied to determine if a partial impervious barrier in a tank bund is sufficient or if the whole bund needs to be equipped with an impervious barrier. See Section 4.1.6.1.11.</p> <p>Impervious barriers include:</p> <ul style="list-style-type: none"> <li>• a flexible membrane, such as HDPE</li> <li>• a clay mat</li> <li>• an asphalt surface</li> <li>• a concrete surface.</li> </ul> <p>For chlorinated hydrocarbon solvents (CHC) in single walled tanks, BAT is to apply CHC-proof laminates to concrete barriers (and containments), based on phenolic or furan resins. One form of epoxy resin is also CHC-proof. See Section 4.1.6.1.12.</p> <p>BAT for underground and mounded tanks containing products that can potentially cause soil pollution is to:</p> <ul style="list-style-type: none"> <li>• apply a double walled tank with leak detection, see Section 4.1.6.1.16, or</li> <li>• to apply a single walled tank with secondary containment and leak detection, see Section 4.1.6.1.17.</li> </ul>	<p>contaminated run-off water is diverted to underground reservoirs, fitted with a silt trap and oil-water interceptor to ensure that clean water enter the reservoirs;</p> <p>Chemicals are stored within dedicated bounded rooms. Chemical tanks placed in the outside have their own bund or double wall.</p> <p>Tanks in the tank pit are built directly onto a 400 mm thick concrete foundation underlain with a 4mm thick polyester reinforced membrane that extends to cover the sides of the bund.</p> <p>The chemical tanks are also laid on top of a concrete foundation.</p> <p>This results in a negligible risk of soil pollution.</p> <p>The underground tanks are all concreted. Additionally, the WW pre-treatment tank is made of a higher-grade concrete using imported aggregate (dolomite) which can withstand more aggressive solutions. The concrete also includes an admixture (chemical additives) to provide superior waterproofing qualities.</p>		
Preventing incidents and	See Section 4.1.6.2.1 together with ATEX Directive 1999/92/EC.	An ATEX report will be in place.		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>(major) accidents Flammable areas and ignition sources</b>				
<b>Preventing incidents and (major) accidents Fire protection</b>	<p>The necessity for implementing fire protection measures has to be decided on a case-by-case basis. Fire protection measures can be provided by applying, e.g. (see Section 4.1.6.2.2):</p> <ul style="list-style-type: none"> <li>• fire resistant claddings or coatings</li> <li>• firewalls (only for smaller tanks), and/or</li> <li>• water cooling systems</li> </ul>	<p>A fire-fighting risk assessment report will be in place.</p>		
<b>Preventing incidents and (major) accidents Fire-fighting equipment</b>	<p>The necessity for implementing fire-fighting equipment and the decision on which equipment to apply has to be taken on a case-by-case basis in agreement with the local fire brigade. Some examples are given in Section 4.1.6.2.3.</p>	<p>A fire-fighting risk assessment report will be in place.</p>		
<b>Preventing incidents and (major) accidents Containment of contaminated extinguishant</b>	<p>The capacity for containing contaminated extinguishant depends on the local circumstances, such as which substances are stored and whether the storage is close to watercourses and/or situated in a water catchment area. The applied containment therefore has to be decided on a case-by-case basis, see Section 4.1.6.2.4.</p> <p>For toxic, carcinogenic or other hazardous substances, BAT is to apply full containment.</p>	<p>In the MT plant, firefighting water will be collected in the service water reservoir.</p> <p>In the AD plant, firefighting water will be collected in the reservoir that collects runoff water from the ground.</p>		

## 1.2 Storage of packaged dangerous substances

Aspect of BAT	BAT	Status at Installation	Further comments
<b>Safety and risk management</b>	<p>Operational losses do not occur in storing packaged dangerous materials. The only possible emissions are from incidents and (major) accidents. Companies that fall under the scope of the Seveso II Directive are required to take all measures necessary to prevent and limit the consequences of major accidents. They must, in any, case have a major accident prevention policy (MAPP) and a safety management system to implement the MAPP. Companies in the high risk category (Annex I of the Directive) must also draw up a safety report and an on-site emergency plan and maintain an up-to-date list of substances. However, companies storing dangerous substances not falling under the scope of the Seveso II Directive can also cause emissions from incidents and accidents. Applying a similar, maybe less detailed, safety management system is the first step in preventing and limiting these.</p> <p>BAT in preventing incidents and accidents is to apply a safety management system as described in Sections 4.1.6.1.</p> <p>The degree of detail of the system is clearly dependent on various factors such as: the quantities of substances stored, specific hazards of the substances and the location of the storage. However, the minimum level of BAT is to assess the risks of accidents and incidents on the site using the five steps described in Section 4.1.6.1</p>	<p>Storage of hazardous substances will be minimal and below Seveso II thresholds. Please refer to BA1.003.05. Therefore a major accident prevention policy (MAPP) and a safety management system are not required.</p>	
<b>Training and responsibility</b>	<p>BAT is to appoint a person or persons who is or are responsible for the operation of the store.</p> <p>BAT is to provide the responsible person(s) with specific training and retraining in emergency procedures as described in Section 4.1.7.1 and to inform other staff on the site of the risks of storing packaged dangerous substances and the precautions necessary to safely store substances that have different hazards.</p>	<p>The facility will have its own TCP who shall be responsible for the operation of the plant including the management of the stores.</p> <p>The TCP shall be given on-going training on specific skills including emergency preparedness.</p>	
<b>Storage area</b>	<p>BAT is to apply a storage building and/or an outdoor storage area covered with a roof, as described in Section 4.1.7.2. For storing quantities of less than 2500 litres or kilograms dangerous substances, applying a storage cell as described in Section 4.1.7.2 is also BAT.</p>	<p>A chemical storage room will be in place. The outdoor chemical tanks will be covered.</p>	
<b>Separation and segregation</b>	<p>BAT is to separate the storage area or building of packaged dangerous substances from other storage, from ignition</p>	<p>Both the chemical storage room and the outside chemical tanks are more than 2 m away from the nearest building /</p>	

Aspect of BAT	BAT	Status at Installation	Further comments
	<p>sources and from other buildings on- and off-site by applying a sufficient distance, sometimes in combination with fire-resistant walls. Member States apply different distances between the (outdoor) storage of packaged dangerous substances and other objects on- and off-site; see Section 4.1.7.3 for some examples.</p> <p>BAT is to separate and/or segregate incompatible substances. For the compatible and incompatible combinations see Annex 8.3 of the BREF. Member States apply different distances and/or physical partitioning between the storage of incompatible substances; see Section 4.1.7.4 for some examples.</p>	<p>equipment.</p> <p>The chemical storage room is an isolated single room.</p>	
<b>Containment of leakage and contaminated extinguishant</b>	<p>BAT is to install a liquid-tight reservoir according to Section 4.1.7.5, that can contain all or a part of the dangerous liquids stored above such a reservoir. The choice whether all or only a part of the leakage needs to be contained depends on the substances stored and on the location of the storage (e.g. in a water catchment area) and can only be decided on a case-by-case basis.</p> <p>BAT is to install a liquid-tight extinguishant collecting provision in storage buildings and storage areas according to Section 4.1.7.5. The collecting capacity depends on the substances stored, the amount of substances stored, the type of package used and the applied fire-fighting system and can only be decided on a case-by-case basis.</p>	<p>The chemical storage room is bunded; any extinguishant will be collected in a contained underground sump.</p> <p>Regarding the collection of extinguishant for the outside chemical tanks, as mentioned in the previous section, impermeable and resistant bunds will be used for waste storage. No specific decanting is foreseen in those areas.</p>	
<b>Fire-fighting equipment</b>	<p>BAT is to apply a suitable protection level of fire prevention and fire-fighting measures as described in Section 4.1.7.6. The appropriate protection level has to be decided on a case-by-case basis in agreement with the local fire brigade.</p>	<p>Waste is only stored within the designated halls that are all bunded.</p> <p>The only products foreseen to be stored outside are the bales of RDF, Paper/Card and Plastic. However, these bales are shrink wrapped to ensure no contact of rain water with the product.</p>	
<b>Preventing ignition</b>	<p>BAT is to prevent ignition at source as described in Section 4.1.7.6.1.</p>	<p>It is not foreseen double handling of waste.</p> <p>A health and safety risk assessment will be carried out to determine the conditions for safe operation in each area. Signage for safe operation will also be installed (e.g. no smoking signs).</p>	

## Part 2: Transfer and handling of liquids and liquefied gases

### 2.1 General principles to prevent and reduce emissions

Aspect of BAT	BAT	Status at Installation	Further comments
<b>Inspection and maintenance</b>	BAT is to apply a tool to determine proactive maintenance plans and to develop risk-based inspection plans such as, the risk and reliability based maintenance approach; see Section 4.1.2.2.1.	This will be included in the O&M Manual.	
<b>Leak detection and repair programme</b>	For large storage facilities, according to the properties of the products stored, BAT is to apply a leak detection and repair programme. Focus needs to be on those situations most likely to cause emissions (such as gas/light liquid, under high pressure and/or temperature duties). See Section 4.2.1.3.	To be included in the O&M manual - An inspection program will be included in O&M manual that covers storage areas, pipes, containers/tanks, including a system for keeping records	
<b>Emissions minimisation principle in tank storage</b>	BAT is to abate emissions from tank storage, transfer and handling that have a significant negative environmental effect, as described in Section 4.1.3.1.  This is applicable to large storage facilities, allowing a certain time frame for implementation.	Not applicable. No hazardous waste is foreseen.	
<b>Safety and risk management</b>	BAT in preventing incidents and accidents is to apply a safety management system as described in Section 4.1.6.1.	Storage of hazardous substances will be minimal and below Seveso II thresholds. Therefore a major accident prevention policy (MAPP) and a safety management system are not required.	
<b>Operational procedures and training</b>	BAT is to implement and follow adequate organisational measures and to enable the training and instruction of employees for safe and responsible operation of the installation as described in Section 4.1.6.1.1.	An O&M manual will be in place.  WasteServ together with Contractor will provide: <ul style="list-style-type: none"> <li>• identification of permanent staff required for plant operation, including required base skills;</li> <li>• job training for the specific operation tasks.</li> <li>•</li> </ul>	

### 2.2 Considerations on transfer and handling techniques

Aspect of BAT	BAT	Status at Installation	Further comments
<b>Piping</b>	BAT is to apply aboveground closed piping in new situations, see Section 4.2.4.1. For existing underground piping it is BAT to apply a risk and reliability based maintenance approach as described in Section 4.1.2.2.1.	Within the MT and AD plants, all of the process piping will be above ground. Only the service water is located underground (in an encased trench), although this liquid is not expected to be significantly contaminated. Rainwater	

Aspect of BAT	BAT	Status at Installation	Further comments
	<p>Bolted flanges and gasket-sealed joints are an important source of fugitive emissions. BAT is to minimise the number of flanges by replacing them with welded connections, within the limitation of operational requirements for equipment maintenance or transfer system flexibility, see Section 4.2.2.1.</p> <p>BAT for bolted flange connections (see Section 4.2.2.2.) include:</p> <ul style="list-style-type: none"> <li>• fitting blind flanges to infrequently used fittings to prevent accidental opening</li> <li>• using end caps or plugs on open-ended lines and not valves</li> <li>• ensuring gaskets are selected appropriate to the process application</li> <li>• ensuring the gasket is installed correctly</li> <li>• ensuring the flange joint is assembled and loaded correctly</li> <li>• where toxic, carcinogenic or other hazardous substances are transferred, fitting high integrity gaskets, such as spiral wound, kammprofile or ring joints.</li> </ul> <p>Internal corrosion may be caused by the corrosive nature of the product being transferred, see Section 4.2.3.1. BAT is to prevent corrosion by:</p> <ul style="list-style-type: none"> <li>• selecting construction material that is resistant to the product</li> <li>• applying proper construction methods</li> <li>• applying preventive maintenance, and</li> <li>• where applicable, applying an internal coating or adding corrosion inhibitors.</li> </ul> <p>To prevent the piping from external corrosion, BAT is to apply a one, two, or three layer coating system depending on the site-specific conditions (e.g. close to sea). Coating is normally not applied to plastic or stainless steel pipelines. See Section 4.2.3.2.</p>	<p>drainage pipes and culverts are also located underground.</p> <p>The 700 m long pipe connecting the MT to the AD will be located below ground, to avoid overheating and protect the pipe against damage (e.g. from vehicle collision). Appropriately-sized chambers will be located every 70 m to enable inspection and maintenance.</p> <p>For the MT-AD pipe connection the maximum length pipes (12 m long) have been selected. To minimise the number of flanges, the pipes will be joined by electrofusion (electrical welding). Flanges will only be installed at the 70 m interval, to enable maintenance.</p> <p>Within the plant, flanges will be installed whenever there is a bend in the pipework, since this is the part where a blockage is most likely. This will allow access for cleaning / maintenance / repair.</p> <p>The selection and installation of flanges, caps and gaskets will be in accordance with standard industry practice, depending on the substance to be transferred in the pipe.</p> <p>Piping material has been selected to be appropriate to the material being transferred (e.g. MDPE, HDPE, stainless steel), and no additional corrosion protection is normally required. However, black steel pipes will be painted with a three-coat corrosion protection system.</p>	

Aspect of BAT	BAT	Status at Installation	Further comments
<b>Vapour treatment</b>	<p>BAT is to apply vapour balancing or treatment on significant emissions from the loading and unloading of volatile substances to (or from) trucks, barges and ships. The significance of the emission depends on the substance and the volume that is emitted, and has to be decided on a case-by-case basis. For more detail see Section 4.2.8.</p> <p>For example, according to Dutch regulations, the emission of methanol is significant when over 500 kg/yr is emitted.</p>	N/A	
<b>Valves</b>	<p>BAT for valves include:</p> <ul style="list-style-type: none"> <li>• correct selection of the packing material and construction for the process application</li> <li>• with monitoring, focus on those valves most at risk (such as rising stem control valves in continual operation)</li> <li>• applying rotating control valves or variable speed pumps instead of rising stem control valves</li> <li>• where toxic, carcinogenic or other hazardous substances are involved, fit diaphragm, bellows, or double walled valves</li> <li>• route relief valves back into the transfer or storage system or to a vapour treatment system.</li> </ul> <p>See Sections 3.2.2.6 and 4.2.9.</p>	<p>Good quality valves will be selected that are appropriate for the technical purpose. The inspection and maintenance schedule will include monitoring of valves, with a focus on higher-risk valves (such as those used more frequently, or subject to greater pressures [e.g. the pulpers' valves]).</p> <p>Air pressure relief valves will generally vent to atmosphere for safety reasons (to prevent explosion). This is considered sufficient considering the nature of the substances inside the containers.</p>	
<b>Pumps and compressors Installation and maintenance of pumps and compressors</b>	<p>The design, installation and operation of the pump or compressor heavily influence the life potential and reliability of the sealing system. The following are some of the main factors which constitute BAT:</p> <ul style="list-style-type: none"> <li>• proper fixing of the pump or compressor unit to its base-plate or frame</li> <li>• having connecting pipe forces within producers' recommendations</li> <li>• proper design of suction pipework to minimise hydraulic imbalance</li> <li>• alignment of shaft and casing within producers' recommendations</li> <li>• alignment of driver/pump or compressor coupling within producers' recommendations when fitted</li> <li>• correct level of balance of rotating parts</li> <li>• effective priming of pumps and compressors prior to start-up</li> <li>• operation of the pump and compressor within producers' recommended performance range (The optimum performance is achieved at its best efficiency point.)</li> </ul>	The installation of pumps and compressors will be in accordance with supplier specifications. Maintenance will be included in the O&M Manual.	

Aspect of BAT	BAT	Status at Installation	Further comments
	<ul style="list-style-type: none"> <li>the level of net positive suction head available should always be in excess of the pump or compressor</li> <li>regular monitoring and maintenance of both rotating equipment and seal systems, combined with a repair or replacement programme.</li> </ul>		
<b>Pumps and compressors</b> <b>Sealing system in pumps</b>	BAT is to use the correct selection of pump and seal types for the process application, preferably pumps that are technologically designed to be tight such as canned motor pumps, magnetically coupled pumps, pumps with multiple mechanical seals and a quench or buffer system, pumps with multiple mechanical seals and seals dry to the atmosphere, diaphragm pumps or bellow pumps. For more details see Sections 3.2.2.2, 3.2.4.1 and 4.2.9.	Pump and seal types will be in accordance with manufacturer specifications.	
<b>Pumps and compressors</b> <b>Sealing systems in compressors</b>	<p>BAT for compressors transferring non-toxic gases is to apply gas lubricated mechanical seals.</p> <p>BAT for compressors, transferring toxic gases is to apply double seals with a liquid or gas barrier and to purge the process side of the containment seal with an inert buffer gas.</p> <p>In very high pressure services, BAT is to apply a triple tandem seal system.</p> <p>For more detail see Sections 3.2.3 and 4.2.9.13.</p>	<p>Compressors will only transfer clean air and methane generated by the plant. Compressors Seals are mechanical seal oil lubrication type</p> <p>No toxic gases will be compressed.</p> <p>No very high pressure services will be installed.</p>	
<b>Sampling connections</b>	BAT, for sample points for volatile products, is to apply a ram type sampling valve or a needle valve and a block valve. Where sampling lines require purging, BAT is to apply closed-loop sampling lines. See Section 4.2.9.14.	Gas (methane) sampling and analysis will be carried out automatically. A manual valve will be included for when analysis in an external lab is required – this will be a needle valve.	

### Part 3: Storage of solids

Aspect of BAT	BAT	Status at Installation	Further comments
<b>Open storage</b>	<p>BAT is to apply enclosed storage by using, for example, silos, bunkers, hoppers and containers, to eliminate the influence of wind and to prevent the formation of dust by wind as far as possible by primary measures. See Table 4.12 for these primary measures with cross-references to the relevant sections.</p> <p>However, although large volume silos and sheds are available, for (very) large quantities of not or only moderately drift sensitive and wettable material, open storage might be the only option. Examples are the long-</p>	<p>Waste is only stored within the designated halls that are all bounded.</p> <p>The only products foreseen to be stored outside are the bales of RDF, Paper/Card and Plastic. However, these bales are shrink wrapped to ensure no contact of rain water with the product.</p> <p>It is not foreseen double handling of waste.</p>	

Aspect of BAT	BAT	Status at Installation	Further comments
	<p>term strategic storage of coal and the storage of ores and gypsum.</p> <p>BAT for open storage is to carry out regular or continuous visual inspections to see if dust emissions occur and to check if preventive measures are in good working order. Following the weather forecast by, e.g, using meteorological instruments on site, will help to identify when the moistening of heaps is necessary and will prevent unnecessary use of resources for moistening the open storage. See Section 4.3.3.1.</p> <p>BAT for long-term open storage are one, or a proper combination, of the following techniques:</p> <ul style="list-style-type: none"> <li>• moistening the surface using durable dust-binding substances, see Section 4.3.6.1</li> <li>• covering the surface, e.g. with tarpaulins, see Section 4.3.4.4</li> <li>• solidification of the surface, see Table 4.13</li> <li>• grassing-over of the surface, see Table 4.13.</li> </ul> <p>BAT for short-term open storage are one, or a proper combination, of the following techniques:</p> <ul style="list-style-type: none"> <li>• moistening the surface using durable dust-binding substances, see Section 4.3.6.1</li> <li>• moistening the surface with water, see Sections 4.3.6.1</li> <li>• covering the surface, e.g. with tarpaulins, see Section 4.3.4.4.</li> </ul> <p>Additional measures to reduce dust emissions from both long and short-term open storage are:</p> <ul style="list-style-type: none"> <li>• placing longitudinal axis of the heap parallel with the prevailing wind</li> <li>• applying protective plantings, windbreak fences or upwind mounds to lower the wind velocity</li> <li>• applying only one heap instead of several heaps as far as possible; with two heaps storing the same amount as one, the free surface increases with 26 %</li> <li>• applying storage with retaining walls reduces the free surface, leading to a reduction of diffuse dust emissions; this reduction is maximised if the wall is placed upwind of the heap</li> <li>• placing retaining walls close together.</li> </ul> <p>See Table 4.13 for more details.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments
<b>Enclosed storage</b>	<p>BAT is to apply enclosed storage by using, for example, silos, bunkers, hoppers and containers. Where silos are not applicable, storage in sheds can be an alternative. This is, e.g. the case if apart from storage, the mixing of batches is needed.</p> <p>BAT for silos is to apply a proper design to provide stability and prevent the silo from collapsing. See Sections 4.3.4.1 and 4.3.4.5.</p> <p>BAT for sheds is to apply proper designed ventilation and filtering systems and to keep the doors closed. See Section 4.3.4.2.</p> <p>BAT is to apply dust abatement and a BAT associated emission level of 1 – 10 mg/m<sup>3</sup>, depending on the nature/type of substance stored. The type of abatement technique has to be decided on a case-by-case basis. See Section 4.3.7.</p> <p>For a silo containing organic solids, BAT is to apply an explosion resistant silo (see Section 4.3.8.3), equipped with a relief valve that closes rapidly after the explosion to prevent oxygen entering the silo, as described in Section 4.3.8.4.</p>	<p>Waste is only stored within the designated halls that are all bounded.</p> <p>The only products foreseen to be stored outside are the bales of RDF, Paper/Card and Plastic. However, these bales are shrink wrapped to ensure no contact of rain water with the product.</p> <p>It is not foreseen double handling of waste.</p> <p>No silos are foreseen.</p> <p>Storage capacity limit:</p> <p><b>MSW:</b> The reception hall has been designed to cater for 4 days storage of MSW. However, it is expected that this capacity will not be used in full under normal operation since good practice dictate that waste is treated as soon as possible after reception (a daily basis is recommended). As the maximum capacity is for a 4 m high waste pile, the available remaining storage capacity can be easily calculated as per the available area.</p> <p><b>BW:</b> Will be treated on a daily basis. No storage is foreseen.</p> <p><b>MANURE:</b> Will be treated on a daily basis, using a storage dosing bunker with capacity for one day (20 m<sup>3</sup>). No storage is foreseen.</p> <p>Air treatment system includes a general odour treatment system in the main buildings and tanks, by biofilters and a dedusting system for the BW crushing area.</p> <p>By this system, crushing, shredding and sieving operations will be carried out in areas with extractive vent systems and abatement.</p> <p>Foreseen limit of emissions: Odour (OUE/m<sup>3</sup>): &lt;500 Dust&lt;=10mg/Nm<sup>3</sup></p>	
<b>Storage of packaged dangerous solids</b>	<p>For details regarding BAT for the storage of packaged dangerous solids, see Section 5.1.2.</p>	<p>Storage of hazardous substances will be minimal and below Seveso II thresholds. Therefore a major accident prevention policy (MAPP) and a safety management system are not</p>	

Aspect of BAT	BAT	Status at Installation	Further comments
		required.	
<b>Preventing incidents and (major) accidents</b> Safety and risk management	<p>The Seveso II Directive (Council Directive 96/82/EC of 9 December 1996 on the control of major accident hazards involving dangerous substances) requires companies to take all measures necessary to prevent and limit the consequences of major accidents. They must in any case have a major accident prevention policy (MAPP) and a safety management system to implement the MAPP. Companies holding large quantities of dangerous substances, so-called upper tiered establishments, must also draw up a safety report and an on-site emergency plan and maintain an up-to-date list of substances. However, plants that do not fall under the scope of the Seveso II Directive can also cause emissions from incidents and accidents. Applying a similar, maybe less detailed, safety management system is the first step in preventing and limiting these.</p> <p>BAT in preventing incidents and accidents is applying a safety management system as described in Section 4.1.7.1.</p>	Storage of hazardous substances will be minimal and below Seveso II thresholds. Therefore a major accident prevention policy (MAPP) and a safety management system are not required.	

#### Part 4: Transfer and handling of solids

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>General approaches to minimise dust from transfer and handling</b>	BAT is to prevent dust dispersion due to loading and unloading activities in the open air, by scheduling the transfer as much as possible when the wind speed is low. However, and taking into account the local situation, this type of measure cannot be generalised to the whole EU and to any situation irrespective of the possible high	Only baled waste will be un/loading outdoors, however since the waste will be baled dust emissions are expected to be minimal. Reject material (which is not baled) will be deposited through conveyors into containers located indoors behind closed doors.		

costs. See Section 4.4.3.1.

Discontinuous transport (e.g. shovel or truck) generally generates more dust emissions than continuous transport such as conveyors. BAT is to make transport distances as short as possible and to apply, wherever possible, continuous transport modes. For existing plants, this might be a very expensive measure. See Section 4.4.3.5.1.

When applying a mechanical shovel, BAT is to reduce the drop height and to choose the best position during discharging into a truck; see Section 4.4.3.4.

While driving, vehicles might swirl up dust from solids spread on the ground. BAT then is to adjust the speed of vehicles on-site to avoid or minimise dust being swirled up; see Section 4.4.3.5.2.

BAT for roads that are used by trucks and cars only, is applying hard surfaces to the roads of, for example, concrete or asphalt, because these can be cleaned easily to avoid dust being swirled up by vehicles, see Section 4.4.3.5.3. However, applying hard surfaces to the roads is not justified when the roads are used just for big shovel vehicles or when a road is temporary.

BAT is to clean roads that are fitted with hard surfaces according to Section 4.4.6.12.

Cleaning of vehicle tyres is BAT. The frequency of cleaning and type of cleaning facility applied (see Section 4.4.6.13) has to be decided on a case-by-case basis.

Where it neither compromises product quality, plant safety, nor water resources, BAT for loading/unloading drift sensitive, wettable products is to moisten the product as described in Sections 4.4.6.8, 4.4.6.9 and 4.3.6.1. Risk of freezing of the product, risk of slippery situations because of ice forming or wet

Internal roads have been designed to maximise transportation efficiency.

Internal roads will all be paved with asphalt.

These aspects will be included in operator and driver training.

A wheelwash is foreseen on site.

The only drift sensitive material on site will be the drying compost (Rottergrad V type material). This will be stored in a roofed compost shed with a gap at the top for natural ventilation and an open door on one side. The operator will ensure that the compost does not dry up too much (to minimise dust dispersion) and that the shed does not become too full (so that the wheel loaders can deposit the material at the back of the shed, away from the front door).

Kindly clarify whether the wheel wash in use shall be the one present on site or else an additional one shall be constructed.

There shall be additional wheel washed as part of the Malta North project – one for the AD area and one for the MTP area.

product on the road and shortage of water are examples when this BAT might not be applicable.

For loading/unloading activities, BAT is to minimise the speed of descent and the free fall height of the product; see Sections 4.4.5.6 and 4.4.5.7 respectively. Minimising the speed of descent can be achieved by the following techniques that are BAT:

- installing baffles inside fill pipes
- applying a loading head at the end of the pipe or tube to regulate the output speed
- applying a cascade (e.g. cascade tube or hopper)
- applying a minimum slope angle with, e.g. chutes.

To minimise the free fall height of the product, the outlet of the discharger should reach down onto the bottom of the cargo space or onto the material already piled up. Loading techniques that can achieve this, and that are BAT, are:

- height adjustable fill pipes
- height adjustable fill tubes, and
- height adjustable cascade tubes.

These techniques are BAT, except when loading/unloading non drift sensitive products, for which the free fall height is not that critical.

Optimised discharged hoppers are available and described in Section 4.4.6.7

This is applicable for the transfer of rejects from the conveyors into the reject containers. There is a fixed height to allow the containers to be placed and replaced directly under the conveyor. However, this procedure is carried out inside with the doors closed (except for when containers are replaced); thus emissions are minimised.

Additionally, solids will be transferred from the centrifuge (in the dewatering building) to the compost shed via a conveyor. However, the compost will at this stage have a high moisture content and the conveyor is located inside the closed dewatering building (first part) and inside the roofed compost shed (second part), so no significant dust emissions are expected.

**Considerations on transfer techniques**  
**Grabs**

For applying a grab, BAT is to follow the decision diagram as shown in Section 4.4.3.2 and to leave the grab in the hopper for a sufficient time after the material discharge.

Grabs are only used in the MSW and BW reception hall, to feed the waste into the system. Grab operation will be included in operator training, and transfers are only carried out inside the hall, which is connected to dust abatement.

BAT for new grabs, is to apply grabs with the following properties (see Section 4.4.5.1):

- geometric shape and optimal load capacity

- the grab volume is always higher than the volume that is given by the grab curve
- the surface is smooth to avoid material adhering, and
- a good closure capacity during permanent operation.

**Considerations on transfer techniques**  
**Conveyors and transfer chutes**

For all types of substances, BAT is to design conveyor to conveyor transfer chutes in such a way that spillage is reduced to a minimum. A modelling process is available to generate detail designs for new and existing transfer points. For more details see Section 4.4.5.5.

For non or very slightly drift sensitive products (S5) and moderately drift sensitive, wettable products (S4), BAT is to apply an open belt conveyor and additionally, depending on the local circumstances, one or a proper combination of the following techniques:

- lateral wind protection, see Section 4.4.6.1
- spraying water and jet spraying at the transfer points, see Sections 4.4.6.8 and 4.4.6.9, and/or
- belt cleaning, see Section 4.4.6.10.

For highly drift sensitive products (S1 and S2) and moderately drift sensitive, not wettable products (S3) BAT for new situations, is to:

- apply closed conveyors, or types where the belt itself or a second belt locks the material (see Section 4.4.5.2), such as:
  - pneumatic conveyors
  - trough chain conveyors
  - screw conveyors
  - tube belt conveyor
  - loop belt conveyor
  - double belt conveyor
    - or to apply enclosed conveyor belts without support pulleys (see Section 4.4.5.3), such as:
      - aerobelt conveyor
      - low friction conveyor
      - conveyor with diabolos.

The type of conveyor depends on the substance to be transported and on the location and has to be decided on a case-by-case basis.

Guiding plates will be installed at the sides of the conveyors to guide the material from one conveyor to the next. The drop height from one conveyor to another is kept to a minimum to reduce dust emissions.

Additionally, for loading/unloading this is applicable for the transfer of rejects from the conveyors into the reject containers. There is a fixed height to allow the containers to be placed and replaced directly under the conveyor. However, this procedure is carried out inside with the doors closed (except for when containers are replaced); thus emissions are minimised.

Additionally, solids will be transferred from the centrifuge (in the dewatering building) to the compost shed via a conveyor. However, the compost will at this stage have a high moisture content and the conveyor is located inside the closed dewatering building (first part) and inside the roofed compost shed (second part), so no significant dust emissions are expected.

With reference to Section 4.4.5.2 of the BREF, no closed conveyors are foreseen.

For existing conventional conveyors, transporting highly drift sensitive products (S1 and S2) and moderately drift sensitive, not wettable products (S3), BAT is to apply housing; see Section 4.4.6.2. When applying an extraction system, BAT is to filter the outgoing air stream; see Section 4.4.6.4.

To reduce energy consumption for conveyor belts (see Section 4.4.5.2), BAT is to apply:

- a good conveyor design, including idlers and idler spacing
- an accurate installation tolerance, and
- a belt with low rolling resistance.

See Annex 8.4 for the disperseveness classes (S1 – S4) of solid bulk materials.

**C: Comparison of the processes at Facility with the BREF for Energy efficiency (published February 2009).**

**Part 1. Best Available Techniques for achieving energy efficiency at an installation level**

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
<b>Energy efficiency management</b>	<p>A number of energy efficiency management techniques are determined as BAT. The scope (e.g. level of detail) and nature of the energy efficiency management system (ENEMS) (e.g. standardised or non-standardised) will generally be related to the nature, scale and complexity of the installation, as well as the energy requirements of the component processes and systems (see Section 2.1):</p> <p>BAT is to implement and adhere to an energy efficiency management system (ENEMS) that incorporates, as appropriate to the local circumstances, all of the following features (see Section 2.1. The letters (a), (b), etc. below, correspond those in Section 2.1):</p> <p>a. commitment of top management (commitment of the top management is regarded as a precondition for the successful application of energy efficiency management)</p>	Energy efficiency management shall be captured via EMS objectives and targets.		

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	<p>b. definition of an energy efficiency policy for the installation by top management</p> <p>c. planning and establishing objectives and targets (see BAT “Continuous environmental improvement”, BAT “Identification of energy efficiency aspects of an installation and opportunities for energy savings” and BAT “Establishing and reviewing energy efficiency objectives and indicators”)</p> <p>d. implementation and operation of procedures paying particular attention to:</p> <ul style="list-style-type: none"> <li>▪ structure and responsibility</li> <li>▪ training, awareness and competence (see BAT “Maintaining expertise”)</li> <li>▪ communication</li> <li>▪ employee involvement</li> <li>▪ documentation</li> <li>▪ effective control of processes (see BAT “Effective control of processes”)</li> <li>▪ maintenance (see BAT “Maintenance”)</li> <li>▪ emergency preparedness and response</li> <li>▪ safeguarding compliance with energy efficiency-related legislation and agreements (where such agreements exist).</li> </ul> <p>e. benchmarking: the identification and assessment of energy efficiency indicators over time (see BAT “Establishing and reviewing energy efficiency objectives and indicators”), and the systematic and regular comparisons with sector, national or regional benchmarks for energy efficiency, where verified data are available (see Sections 2.1(e), 2.16 and BAT “Benchmarking”)</p> <p>f. checking performance and taking corrective action paying particular attention to:</p> <ul style="list-style-type: none"> <li>▪ monitoring and measurement (see BAT “Monitoring and measurement”)</li> <li>▪ corrective and preventive action</li> <li>▪ maintenance of records</li> <li>▪ independent (where practicable)</li> </ul>			

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>internal auditing in order to determine whether or not the energy efficiency management system conforms to planned arrangements and has been properly implemented and maintained (see BAT Identification of energy efficiency aspects of an installation and opportunities for energy savings” )</p> <p>g. review of the ENEMS and its continuing suitability, adequacy and effectiveness by top management.</p> <p>For (h) and (i), see further features on an energy efficiency statement and external verification, below</p> <ul style="list-style-type: none"> <li>○ when de signing a new unit, taking into account the environmental impact from the eventual decommissioning of the unit</li> <li>○ development of energy efficient technologies, and to follow developments in energy efficiency techniques.</li> </ul> <p>The ENEMS may be achieved by ensuring these elements form part of existing management systems (such as an EMS) or by implementing a separate energy efficiency management system.</p> <p>Three further features are considered as supporting measures. Although these features have advantages, systems without them can be BAT. These three additional steps are:</p> <ul style="list-style-type: none"> <li>• (see Section 2.1(h)) preparation and publication ( and possibly external validation) of a regular energy efficiency statement describing all the significant environmental aspects of the installation, allowing for year-by-year comparison against environmental objectives and targets as well as with sector</li> </ul>			

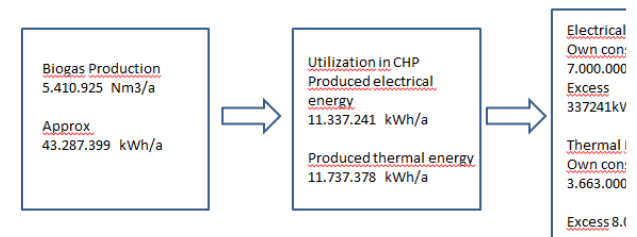
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	<p>benchmarks as appropriate</p> <ul style="list-style-type: none"> <li>(see Section 2.1(i)) having the management system and audit procedure examined and validated by an accredited certification body or an external ENEMS verifier</li> <li>(see Section 2.1, Applicability, 2) implementation and adherence to a nationally or internationally accepted voluntary system such as: <ul style="list-style-type: none"> <li>DS2403, IS 393, SS627750, VDI Richtlinie No. 46, etc.</li> <li>(when including energy efficiency management in an EMS) EMAS and EN ISO 14001:1996. This voluntary step could give higher credibility to the ENEMS. However, non-standardised systems can be equally effective provided that they are properly designed and implemented.</li> </ul> </li> </ul> <p><i>Applicability:</i> All installations. The scope and nature (e.g. level of detail) of applying this ENEMS will depend on the nature, scale and complexity of the installation, and the energy requirements of the component processes and systems.</p>			
<p><b>Planning and establishing objectives and targets</b> <b>Continuous environmental improvement</b></p>	<p>An important aspect of environmental management systems is continuing environmental improvement. This requires maintaining a balance for an installation between consumption of energy, raw materials and water, and the emissions (see Sections 1.1.6 and 2.2.1). Planned continuous improvement can also achieve the best cost-benefit for achieving energy savings (and other environmental benefits).</p> <p>BAT is to continuously minimise the environmental impact of an installation by planning actions and investments on an integrated basis and for the short, medium and long term, considering the cost-benefits and</p>	<p>One important objective at the Malta North MBT plant, which is related to energy, is the generation of electricity units, as follows:</p> <p>Energy balance of the Plant without Manure Plant</p>		

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cross-media effects.

Energy balance of the Plant (estimation)

*Applicability:  
All installations.  
'Continuously' means the actions are repeated over time, i.e. all planning and investment decisions should consider the overall long term aim to reduce the environmental impacts of the operation. This may mean avoiding short term actions to better use available investments over a longer term, e.g. changes to the core process may require more investment and take longer to implement, but may bring bigger reductions in energy use and emissions (see examples in Section 2.2.1).*



*The environmental benefits may not be linear, e.g. 2 % energy savings every year for 10 years. They may be stepwise, reflecting investment in ENE projects, etc. (see Section 2.2.1). Equally, there may be cross-media effects: for example it may be necessary to increase energy consumption to abate an air pollutant.*

*Environmental impacts can never be reduced to zero, and there will be points in time where there is little or no cost-benefit to further actions. However, over a longer period, with changing technology and costs (e.g. energy prices), the viability may also change.*

<p><b>Planning and establishing objectives and targets</b> <b>Identification of energy efficiency aspects of an installation and opportunities for energy savings</b></p>	<p>In order to optimise energy efficiency, the aspects of an installation that influence energy efficiency need to be identified and quantified (see Section 2.11). Energy savings can then be identified, evaluated, prioritised and implemented according to the previous BAT, above (see Section 2.1(c)).</p> <p>BAT is to identify the aspects of an installation that influence energy efficiency by carrying out an audit. It is important that an audit is coherent with a systems approach (see BAT “A systems approach to energy management”).</p>	<p>The Facilities have been designed to maximise energy efficiency related to both energy generation from the Mechanical - Biological Treatment Plant (MBT) and the Biogas Plant (BGP) as well as energy consumption of buildings and equipment.</p> <p>The facility design incorporates all reasonable energy efficiency measures including:</p>	
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	<p><i>Applicability:</i> All existing installations and prior to planning upgrades or rebuilds. An audit may be internal or external.</p> <p><i>The scope of the audit and nature (e.g. level of detail, the time between audits) will depend on the nature, scale and complexity of the installation and the energy consumption of the component processes and systems (see Section 2.8.), e.g.:</i></p> <ul style="list-style-type: none"> <li>○ in large installations with many systems and individual energy-using components such as motors, it will be necessary to prioritise data collection to necessary information and significant uses</li> <li>○ in smaller installations, a walk-through type audit may be sufficient.</li> </ul> <p><i>The first energy audit for an installation may be called an energy diagnosis.</i></p> <p>When carrying out an audit, BAT is to ensure that the audit identifies the following aspects (see Section 2.11):</p> <ul style="list-style-type: none"> <li>a. energy use and type in the installation and its component systems and processes</li> <li>b. energy-using equipment, and the type and quantity of energy used in the installation</li> <li>c. possibilities to minimise energy use, such as: <ul style="list-style-type: none"> <li>○ controlling/reducing operating times, e.g. switching off when not in use (e.g. see Sections 3.6, 3.7, 3.8, 3.9, 3.11)</li> <li>○ ensuring insulation is optimised, e.g. see Sections 3.1.7, 3.2.11 and 3.11.3.7</li> <li>○ optimising utilities, associated systems, processes and equipment (see Chapter 3)</li> <li>d. possibilities to use alternative</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Building insulation to minimum Building Regulation standards</li> <li>• Pipework insulation</li> <li>• Variable speed drives where appropriate</li> <li>• Energy efficient lighting and controls as required by building regulations</li> </ul> <p>Both Facilities shall be energy self-sufficient in yearly average provided that the forecasts regarding waste and manure quantities and compositions will come true. Composition data from 2002 are the basis for the percentage of biodegradable material in the domestic waste. It is assumed that this percentage will further decrease in the future.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>sources or use of energy that is more efficient, in particular energy surplus from other processes and/or systems, see Section 3.3</p> <p>e. possibilities to apply energy surplus to other processes and/or systems, see Section 3.3</p> <p>f. possibilities to upgrade heat quality (see Section 3.3.2).</p> <p><i>Applicability:</i>  <i>All installations. The scope of the audit and the nature (e.g. level of detail) will depend on the nature, scale and complexity of the installation, and the energy consumption of the component processes and systems.</i></p> <p><i>Examples of some techniques for optimising systems and processes are given in the relevant sections in Chapter 3.</i></p> <p>BAT is to use appropriate tools or methodologies to assist with identifying and quantifying energy optimisation, such as:</p> <ul style="list-style-type: none"> <li>○ energy models, databases and balances (see Section 2.15)</li> <li>○ a technique such as pinch methodology (see Section 2.12) exergy or enthalpy analysis (see Section 2.13), or thermoeconomics (see Section 2.14)</li> <li>○ estimates and calculations (see Sections 1.5 and 2.10.2).</li> </ul> <p><i>Applicability:</i>  <i>Applicable to every sector. The choice of appropriate tool or tools will depend on the sector, and the size, complexity and energy usage of the site. This will be site-specific, and is discussed in the relevant sections.</i></p> <p>BAT is to identify opportunities to optimise energy recovery within the installation, between systems within the installation (see BAT “A systems approach to energy management”) and/or with a third party (or</p>			

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>parties), such as those described in Sections 3.2, 3.3 and 3.4.</p> <p><i>Applicability:</i>  <i>The scope for energy recovery depends on the existence of a suitable use for the heat at the type and quantity recovered (see Sections 3.3 and 3.4, and Annexes 7.10.2 and 7.10.3). A systems approach is set out in Section 2.2.2 and BAT “A systems approach to energy management”). Opportunities may be identified at various times, such as a result of audits or other investigations, when considering upgrades or new plants, or when the local situation changes (such as a use for surplus heat is identified in a nearby activity).</i></p> <p><i>The cooperation and agreement of a third party may not be within the control of the operator, and therefore may not be within the scope of an IPPC permit. In many cases, public authorities have facilitated such arrangements or are the third party.</i></p>			
<b>Planning and establishing objectives and targets</b> <b>A systems approach to energy management</b>	<p>The major energy efficiency gains are achieved by viewing the installation as a whole and assessing the needs and uses of the various systems, their associated energies and their interactions (see Sections 1.3.5, 1.4.2 and 2.2.2).</p> <p>BAT is to optimise energy efficiency by taking a systems approach to energy management in the installation. Systems to be considered for optimising as a whole are, for example:</p> <ul style="list-style-type: none"> <li>➤ process units (see sector BREFs)</li> <li>➤ heating systems such as: <ul style="list-style-type: none"> <li>• steam (see Section 3.2)</li> <li>• hot water</li> </ul> </li> <li>➤ cooling and vacuum (see the ICS BREF)</li> <li>➤ motor driven systems such as: <ul style="list-style-type: none"> <li>• compressed air (see Section 3.7)</li> <li>• pumping (see Section 3.8)</li> </ul> </li> </ul>	N/A		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<ul style="list-style-type: none"> <li>➤ lighting (see Section 3.10)</li> <li>➤ drying, separation and concentration (see Section 3.11).</li> </ul>			
	<p><i>Applicability:</i>  <i>All installations. The scope and nature (e.g. level of detail, frequency of optimisation, systems to be considered at any one time) of applying this technique will depend on factors such as the nature, scale and complexity of the installation, the energy requirements of the component processes and systems and the techniques considered for application.</i></p>			
<b>Planning and establishing objectives and targets</b> <b>Establishing and reviewing energy efficiency objectives and indicators</b>	<p>Quantifiable, recorded energy efficiency objectives are crucial for achieving and maintaining energy efficiency. Areas for improvement are identified from an audit (see BAT “Identification of energy efficiency aspects of an installation and opportunities for energy savings”). Indicators need to be established to assess the effectiveness of energy efficiency measures. For process industries, these are preferably indicators related to production or service throughput (e.g. GJ/t product, see Section 1.3), termed specific energy consumption (SEC). Where a single energy objective (such as SEC) cannot be set, or where it is helpful, the efficiency of individual processes, units or systems may be assessed. Indicators for processes are often given in the relevant sector BREFS (for an overview, see [283, EIPPCB]).</p> <p>Production parameters (such as production rate, product type) vary and these may affect the measured energy efficiency and should be recorded to explain variations and to ensure that energy efficiency is realised by the techniques applied (see Sections 1.4 and 1.5). Energy use and transfers may be complicated and the boundary of the installation or system being assessed should be carefully defined on the basis of entire systems (see Sections 1.3.5 and 1.4.2 and previous BAT “A systems</p>	<p>As stated earlier, one objective of the facility is the generation of electricity units. This objective shall be included as part of the objectives within the EMS. Consequently energy efficiency, consumption and generation shall be monitored closely throughout the year.</p>	<p>Objectives shall be communicated to management during management review meetings and targets and objectives may be updated accordingly.</p>	

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	<p>approach to energy management”). Energy should be calculated on the basis of primary energy, or the energy uses shown as secondary energy for the different utilities (e.g. process heat as steam use in GJ/t, see Section 1.3.6.1).</p> <p>BAT is to establish energy efficiency indicators by carrying out all of the following:</p> <ul style="list-style-type: none"> <li>a. identifying suitable energy efficiency indicators for the installation, and where necessary, individual processes, systems and/or units, and measure their change over time or after the implementation of energy efficiency measures (see Sections 1.3 and 1.3.4)</li> <li>b. identifying and recording appropriate bound aries associated with the indicators (see Sections 1.3.5 and 1.5.1)</li> <li>c. identifying and recording factors that can cause variation in the energy efficiency of the relevant process, systems and/or units (see Sections 1.3.6 and 1.5.2).</li> </ul> <p><i>Applicability:</i>  <i>All installations. The scope and nature (e.g. level of detail) of applying these techniques will depend on the nature, scale and complexity of the installation, and the energy consumption of the component processes and systems.</i></p> <p><i>Secondary or final energies are usually used for monitoring ongoing situations. In some cases, it may be most convenient to use more than one secondary or final energy indicator, for example, in the pulp and paper industry, where both electricity and steam are given as joint energy efficiency indicators. When deciding on the use (or change) of energy vectors and utilities, the energy indicator used may also be the secondary or final energy. However, other indicators such as primary</i></p>			

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	<i>energy or carbon balance may be used, to take account of the production of any secondary energy vector and the cross-media effects, depending on local circumstances (see Section 1.3.6.1).</i>			
<b>Planning and establishing objectives and targets</b> <b>Benchmarking</b>	<p>Benchmarking is a powerful tool for assessing the performance of a plant and the effectiveness of energy efficiency measures, as well as overcoming paradigm blindness.<sup>1</sup> Data may be found in sector BREFs, trade association information, national guidance documents, theoretical energy calculations for processes, etc. Data should be comparable and may need to be corrected, e.g. for type of feedstock. Data confidentiality may be important, such as where energy consumption is a significant part of the cost of production, although it may be possible to protect data (see Section 2.16). See also the establishment of energy indicators in the previous BAT “Establishing and reviewing energy efficiency objectives and indicators”.</p> <p>Benchmarking can also be applied to processes and working methods (see Sections 2.5 and 2.16).</p> <p>BAT is to carry out systematic and regular comparisons with sector, national or regional benchmarks, where validated data are available.</p> <p><i>Applicability: All installations. The level of detail will depend on the nature, scale and complexity of the installation, and the energy consumption of the component processes and systems. Confidentiality issues may need to be addressed (see Section 2.16): for instance, the results of benchmarking may remain confidential. Validated data include those in BREFs, or those verified by a third party. The</i></p>	<p>A basic set of parameters showing the plants’ performance shall be set at the beginning of operation of the plant.</p> <p>Parameters shall be monitored through the years and improved on. As what happened in other facilities, an exercise shall take place to determine which is the realistic data, for the best performance of the plant. This shall be set as the benchmark.</p> <p>Any targets and objectives for subsequent years shall be based on the year which showed the best performance.</p>		

<sup>1</sup> Paradigm blindness is a term used to describe the phenomenon that occurs when the dominant paradigm prevents one from seeing viable alternatives, i.e. 'the way we do it is best, because we've always done it this way'

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	<p><i>period between benchmarkings is sector-specific and usually long (i.e. years), as benchmark data rarely change rapidly or significantly in a short time period.</i></p>			
<b>Energy efficient design (EED)</b>	<p>The planning phase of a new installation, unit or system (or one undergoing major refurbishment) offers the opportunity to consider the lifetime energy costs of processes, equipment and utility systems, and to select the most energy efficient options, with the best lifetime costs (see Section 2.1(c)).</p> <p>BAT is to optimise energy efficiency when planning a new installation, unit or system or a significant upgrade (see Section 2.3) by considering all of the following:</p> <ul style="list-style-type: none"> <li>a. the energy efficient design (EED) should be initiated at the early stages of the conceptual design/basic design phase, even though the planned investments may not be well-defined. The EED should also be taken into account in the tendering process</li> <li>b. the development and/or selection of energy efficient technologies (see Sections 2.1(k) and 2.3.1)</li> <li>c. additional data collection may need to be carried out as part of the design project or separately to supplement existing data or fill gaps in knowledge</li> <li>d. the EED work should be carried out by an energy expert</li> <li>e. the initial mapping of energy consumption should also address which parties in the project organisations influence the future energy consumption, and should optimise the energy efficiency design of the future plant with them. For example, the staff in the (existing) installation who may be responsible for specifying design parameters.</li> </ul>	<p>Refer to B 2.6.1 of Annex 3 of the IPPC application.</p>		

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	<p><i>Applicability:</i>  All new and significantly refurbished installations, major processes and systems.  Where relevant in-house expertise on ENE is not available (e.g. non-energy intensive industries), external ENE expertise should be sought (see Section 2.3).</p>			
<b>Increased process integration</b>	<p>There are additional benefits to seeking process integration, such as optimising raw material usage.</p> <p>BAT is to seek to optimise the use of energy between more than one process or system (see Section 2.4), within the installation or with a third party.</p> <p><i>Applicability:</i>  All installations. The scope and nature (e.g. level of detail) of applying this technique will depend on the nature, scale and complexity of the installation, and the energy requirements of the component processes and systems.  The cooperation and agreement of a third party may not be within the control of the operator, and therefore may not be within the scope of an IPPC permit. In many cases, public authorities have facilitated such arrangements or are the third party.</p>	<p>Gas from the process is used to produce electricity and heat in the CHPs.</p> <p>Heat from the CHPs is used to heat the digesters.</p>		
<b>Maintaining the impetus of energy efficiency initiatives</b>	<p>To successfully achieve ongoing energy efficiency improvement over time, it is necessary to maintain the impetus of energy efficiency programmes (see Section 2.5).</p> <p>BAT is to maintain the impetus of the energy efficiency programme by using a variety of techniques, such as:</p> <ul style="list-style-type: none"> <li>a. implementing a specific energy efficiency management system (see Section 2.1 and first BAT “Energy efficiency management”)</li> </ul>	<p>To be included as part of the EMS.</p> <p>WasteServ intends to carry out an Energy Efficiency Programme following successful operation of the plant.</p>		

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	<p>b. accounting for energy use based on real ( metered) values, which places both the obligation and credit for energy efficiency on the user/bill payer (see Sections 2.5, 2.10.3 and 2.15.2)</p> <p>c. the creation of financial profit centres for energy efficiency (see Section 2.5)</p> <p>d. benchmarking (see Section 2.16 and BAT “Benchmarking”)</p> <p>e. a fresh look at existing management systems, such as using operational excellence (see Section 2.5)</p> <p>f. using change management techniques (also a feature of operational excellence, see Section 2.5).</p> <p><i>Applicability:</i>  <i>All installations. It may be appropriate to use one technique or several techniques together. The scope and nature (e.g. level of detail) of applying these techniques will depend on the nature, scale and complexity of the installation, and the energy consumption of the component processes and systems. Techniques (a), (b) and (c) are applied and maintained according to the relevant sections referred to. The frequency of application of techniques such as (d), (e) and (f) should be far enough apart to enable the progress of the ENE programme to be assessed, and is therefore likely to be several years.</i></p>			
<b>Maintaining expertise</b>	<p>Human resources are required for the implementation and control of energy efficiency management, and staff whose work may affect energy should receive training (see Section 2.1(d)(i) and (ii), and Section 2.6).</p> <p>BAT is to maintain expertise in energy efficiency and energy-using systems by using techniques such as:</p> <p>a. recruitment of skilled staff and/or</p>	<p>WasteServ together with the Consortium Contractor will provide:</p> <ul style="list-style-type: none"> <li>• identification of permanent staff required for plant operation, including required base skills;</li> <li>• job training for the specific operation tasks.</li> </ul> <p>Recruitment will also consider electrical skills.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p>training of staff. Training can be delivered by in-house staff, by external experts, by formal courses or by self-study/development (see Section 2.6)</p> <p>b. taking staff off-line periodically to perform fixed term/specific investigations (in their original installation or in others, see Section 2.5)</p> <p>c. sharing in-house resources between sites (see Section 2.5)</p> <p>d. use of appropriately skilled consultants for fixed term investigations (e.g. see Section 2.11)</p> <p>e. outsourcing specialist systems and/or functions (e.g. see Annex 7.12)</p> <p><i>Applicability:</i>  <i>All installations. The scope and nature (e.g. level of detail) of applying these techniques will depend on the nature, scale and complexity of the installation, and the energy requirements of the component processes and systems.</i></p>	Staff shall be trained in order to maintain a high level of skills.		
<b>Effective control of processes</b>	<p>BAT is to ensure that the effective control of processes is implemented by techniques such as:</p> <p>a. having systems in place to ensure that procedures are known, understood and complied with (see Sections 2.1(d)(vi) and 2.5)</p> <p>b. ensuring that the key performance parameters are identified, optimised for energy efficiency and monitored (see Sections 2.8 and 2.10)</p> <p>c. documenting or recording these parameters (see Sections 2.1(d)(vi), 2.5, 2.10 and 2.15).</p>	Procedures will be included in the O&M Manual, and training will be provided to operators.	The Control System will include monitoring and documentation of key performance parameters.	

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p><i>Applicability:</i>  <i>All installations. The scope and nature (e.g. level of detail) of applying these techniques will depend on the sector, nature, scale and complexity of the installation, and the energy requirements of the component processes and systems.</i></p>			
<b>Maintenance</b>	<p>Structured maintenance and the repair of equipment that uses energy and/or controls energy use at the earliest opportunity are essential for achieving and maintaining efficiency (see Sections 2.1(d)(vii), 2.9 and first BAT “Energy efficiency management”).</p> <p>BAT is to carry out maintenance at installations to optimise energy efficiency by applying all of the following:</p> <ul style="list-style-type: none"> <li>a. clearly allocating responsibility for the planning and execution of maintenance</li> <li>b. establishing a structured programme for maintenance based on technical descriptions of the equipment, norms, etc. as well as any equipment failures and consequences. Some maintenance activities may be best scheduled for plant shutdown periods</li> <li>c. supporting the maintenance programme by appropriate record keeping systems and diagnostic testing</li> <li>d. identifying from routine maintenance, breakdowns and/or abnormalities possible losses in energy efficiency, or where energy efficiency could be improved</li> <li>e. identifying leaks, broken equipment, worn bearings, etc. that affect or control energy usage, and rectifying them at the earliest opportunity.</li> </ul> <p><i>Applicability:</i></p>	<p>A maintenance programme will be included in the O&amp;M Manual.</p>		

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
	<p><i>All installations. The scope and nature (e.g. level of detail) of applying these techniques will depend on the nature, scale and complexity of the installation, and the energy requirements of the component processes and systems. Carrying out repairs promptly has to be balanced (where applicable) with maintaining the product quality and process stability and the health and safety issues of carrying out repairs on the operating plant (e.g. it may contain moving and/or hot equipment, etc.).</i></p>			
<b>Monitoring and measurement</b>	<p>Monitoring and measurement are an essential part of checking in a ‘plan-do-check-act’ system, such as in energy management (Section 2.1). It is also a part of the effective control of processes (see BAT “Effective control of processes”).</p> <p>BAT is to establish and maintain documented procedures to monitor and measure, on a regular basis, the key characteristics of operations and activities that can have a significant impact on energy efficiency. Some suitable techniques are given in Section 2.10.</p> <p><i>Applicability:</i>  <i>All installations. The scope and nature (e.g. level of detail) of applying this technique will depend on the nature, scale and complexity of the installation, and the energy requirements of the component processes and systems.</i></p>	<p>Environmental monitoring at onsite and offsite points shall be carried out as part of the environmental monitoring programme which is already implemented close to the area in Ghallis. This programme shall be updated to take into account effluents and emissions from the new MBT plant.</p> <p>Further to this, the Control System will include monitoring and documentation of key performance parameters which are more specific to the operations at the MBT plant.</p>	<p>Kindly advise how an integrated monitoring programme will be in place.</p>	<p>IT is WasteServ’s plan to engage consultants to:</p> <ul style="list-style-type: none"> <li>- Consider the already existing data gathered for the close proximity sites (Zwejra and Ghallis). This data will provide a baseline assessment prior to the operation of the Malta North Waste Treatment Plant.</li> <li>- Consider the sensitive receptors at the vicinity of the new plant – including AD and MTP.</li> <li>- Consider the effluents, emissions and other potential pollution generated from the operation of the plant – including the AD and the MTP.</li> <li>- Determine the monitoring requirements for: <ul style="list-style-type: none"> <li>o Air quality monitoring (both offsite and onsite)</li> <li>o Stacks monitoring</li> <li>o Waste water, ground water, surface water</li> <li>o Soil and agricultural products</li> <li>o Coastal water and coastal sediments</li> <li>o Noise</li> <li>o Odour</li> </ul> </li> </ul>
<p>At this point WasteServ cannot submit a full</p>				

Aspect of BAT	BAT	Status at Installation	Further comments	WSM Reply February 2015
				programme for monitoring since the plant is not yet operational. Ideally the programme is compiled after some months the plant is operational so as to base the programme on facts.

## Part 2. Best available techniques for achieving energy efficiency in energy-using systems, processes, activities or equipment

Aspect of BAT	BAT	Status at Installation
<b>Introduction</b>	<p>Section 4.2.2.3 identifies the importance of seeing the installation as a whole, and assessing the needs and purposes of the various systems, their associated energies and their interactions.</p> <p>BAT “A systems approach to energy management” gives examples of systems commonly found in installations.</p> <p>In the previous Section “Best available techniques for achieving energy efficiency at an installation level”, there are BAT that are generally applicable to all systems, processes and associated activities. These include:</p> <ul style="list-style-type: none"> <li>• analysing and benchmarking the system and its performance (BAT “Energy efficiency management”, BAT “Identification of energy efficiency aspects of an installation and opportunities for energy savings”, BAT “Establishing and reviewing energy efficiency objectives and Indicators” and BAT “Benchmarking”)</li> <li>• planning actions and investments to optimise energy efficiency considering the cost-benefits and cross-media effects (BAT “Continuous environmental improvement”)</li> <li>• for new systems, optimising energy efficiency in the design of the installation, unit or system and in the selection of processes (BAT “Energy efficient design (EED)”)</li> <li>• for existing systems, optimising the energy efficiency of the system through its operation and management, including regular monitoring and maintenance ( see BAT “Effective control of processes”, BAT “Maintenance” and BAT</li> </ul>	Noted.

Aspect of BAT	BAT	Status at Installation
	<p>“Monitoring and measurement”).</p> <p>The BAT presented in this section therefore assume that these general BAT in the previous Section “Best available techniques for achieving energy efficiency at an installation level” are also applied to the systems described below, as part of their optimisation.</p>	
<b>Combustion</b>	<p>Combustion is a widely used process for both direct heating (such as in cement and lime manufacture, steel making) and indirect heating (such as firing steam boiler systems and electricity generation). Techniques for energy efficiency in combustion are therefore addressed in the appropriate sector BREFs. For other cases, such as combustion in associated activities, the Scope of the LCP BREF states:</p> <p>'...smaller units can potentially be added to a plant to build one larger installation exceeding 50 MW. This means that all kinds of conventional power plants (e.g. utility boiler, combined heat and power plants, district heating plants.) used for mechanical power and heat generation are covered by this (LCP BREF) work.'</p> <p>BAT is to optimise the energy efficiency of combustion by relevant techniques such as:</p> <ul style="list-style-type: none"> <li>○ those specific to sectors given in vertical BREFs</li> <li>○ those given in Figure 1.</li> </ul>	<p>The capacity of the CHP plants are 1.2 MW and 0.6 MW (therefore below 50 MW).</p> <p>With reference to Figure 1, the biogas:air ratio is regulated in the CHP to improve the efficiency of combustion. The mix is adjusted depending on the quality (CH<sub>4</sub> content) of the biogas.</p>
<b>Steam systems</b>	<p>Steam is a widely used heat transport medium because of its non-toxic nature, stability, low cost and high heat capacity, and flexibility in use. Steam utilisation efficiency is</p>	<p>Not applicable. No steam systems are foreseen.</p>

Aspect of BAT	BAT	Status at Installation
	<p>frequently neglected, as it is as not as easily measured as the thermal efficiency of a boiler. It may be determined using tools such as those in BAT “Identification of energy efficiency aspects of an installation and opportunities for energy savings” in conjunction with appropriate monitoring (see Section 2.10).</p> <p>BAT for steam systems is to optimise the energy efficiency by using techniques such as:</p> <ul style="list-style-type: none"> <li>○ those specific to sectors given in vertical BREFs</li> <li>○ those given in Figure 2.</li> </ul>	
<p><b>Heat recovery</b></p>	<p>The main types of heat recovery systems are described in Section 3.3:</p> <ul style="list-style-type: none"> <li>• heat exchangers (see Section 3.3.1)</li> <li>• heat pumps (see Section 3.3.2).</li> </ul> <p>Heat exchange systems are widely used with good results in many industrial sectors and systems, and are widely used for implementing BAT “Identification of energy efficiency aspects of an installation and opportunities for energy savings” and BAT “Increased process integration”. Heat pumps are being increasingly used.</p> <p>The use of 'wasted' or surplus heat may be more sustainable than using primary fuels, even if the energy efficiency in use is lower.</p>	<p>One heat exchanger will be installed to recover the heat from the CHPs’ cooling system, which is used to heat the digestors.</p> <p>Cooling is only carried out in the pulpers’ motors and the aeration tanks (to control the temperature of the sludge inside). This is carried out using chillers and heat exchangers.</p> <p>A maintenance programme will be included in the O&amp;M Manual.</p>

Aspect of BAT	BAT	Status at Installation
	<p>Heat recovery is not applicable where there is no demand that matches the production curve.</p> <p>However, it is being applied in an increasing number of cases, and many of these can be found outside of the installation, see Section 3.4 and Annex 7.10.</p> <p>Techniques for cooling and the associated BAT are described in the ICS BREF, including techniques for the maintenance of heat exchangers.</p> <p>BAT is to maintain the efficiency of heat exchangers by both:</p> <ul style="list-style-type: none"> <li>a. monitoring the efficiency periodically, and</li> <li>b. preventing or removing fouling</li> </ul> <p>See Section 3.3.1.1.</p>	
<b>Cogeneration</b>	<p>There is significant interest in cogeneration, supported at European Community level by the adoption of Directive 2004/8/EC on the promotion of cogeneration, and Directive 2003/96/EC on energy taxation, as well as by various national level policies and incentives. Relatively small scale plants may now be economically feasible, and incentives may also be available. In many cases, cogeneration has been successfully installed due to the assistance of local authorities. See Section 3.4 and Annex 7.10.3 and 7.10.4.</p> <p>Utilities modelling, described in Section 2.15.2, can assist the optimisation of generation and heat recovery systems, as</p>	Not applicable. No cogeneration is foreseen.

Aspect of BAT	BAT	Status at Installation
	<p>well as managing the selling and buying of surplus energy.</p> <p>BAT is to seek possibilities for cogeneration, inside and/or outside the installation (with a third party).</p> <p><i>Applicability:</i>  <i>The cooperation and agreement of a third party may not be within the control of the operator, and therefore may not be within the scope of an IPPC permit.</i></p> <p><i>Cogeneration is as likely to depend as much on economic conditions as ENE optimisation.</i>  <i>Cogeneration opportunities should be sought on the identification of possibilities, on investment either on the generator's side or potential customer's side, identification of potential partners or by changes in economic circumstances (heat, fuel prices, etc.).</i></p> <p><i>In general, cogeneration can be considered when:</i></p> <ul style="list-style-type: none"> <li>• <i>the demands for heat and power are concurrent</i></li> <li>• <i>the heat demand (on-site and/or off-site), in terms of quantity (operating times during year), temperature, etc. can be met using heat from the CHP plant, and no significant heat demand reductions can be expected.</i></li> </ul> <p><i>Section 3.4 discusses the application of cogeneration, the different types of cogeneration (CHP) plants and their applicability in individual cases.</i></p>	

Aspect of BAT	BAT	Status at Installation
	<p><i>Successful implementation may depend on a suitable fuel and/or heat price in relation to the price of electricity. In many cases, public authorities (at local, regional or national level) have facilitated such arrangements or are the third party.</i></p>	
<p><b>Electrical power supply</b></p>	<p>Quality of the electrical power supply and the manner in which the power is used can affect energy efficiency, see Section 3.5. This may be difficult to understand and is often overlooked.</p> <p>There are often energy losses as unproductive power inside the installation and in the external supply grid. There can also be loss of capacity in the installation's electrical distribution system, leading to voltage drops, causing overheating and premature failure of motors and other equipment. It may also lead to increased charges when buying in electricity.</p> <p>BAT is to increase the power factor according to the requirements of the local electricity distributor by using techniques such as those in Table 4.3, according to applicability (see Section 3.5.1).</p>	<p>The power factor will be increased by installing capacitors. This results in a reduction of the electricity consumption.</p>

Aspect of BAT	BAT	Status at Installation
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Technique	Applicability
Installing capacitors in the AC circuits to decrease the magnitude of reactive power	All cases. Low cost and long lasting, but requires skilled application
Minimising the operation of idling or lightly loaded motors	All cases
Avoiding the operation of equipment above its rated voltage	All cases
When replacing motors, using energy efficient motors (see Section 3.6.1)	At time of replacement

Table 4.3: Electrical power factor correction techniques to improve energy efficiency

BAT is to check the power supply for harmonics and apply filters if required (see Section 3.5.2).

The most critical equipment (in terms of harmonic production) will have its own harmonic filters where possible. This will also be included in the power factor correction system.

BAT is to optimise the power supply efficiency by using techniques such as those in Table 4.4, according to applicability:

Power cables have been designed to minimise electricity loss reductions.

The transformers will be operated at the highest load possible, provided the reliability of the plant is not compromised.

Equipment requiring higher loads will be placed as close as possible to the source to minimise losses.

Aspect of BAT	BAT	Status at Installation
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Technique	Applicability	Section in this document
Ensure power cables have the correct dimensions for the power demand	When the equipment is not in use, e.g. at shutdown or when locating or relocating equipment	3.5.3
Keep online transformer(s) operating at a load above 40 – 50 % of the rated power	<ul style="list-style-type: none"> <li>∞ for existing plants: when the present load factor is below 40 %, and there is more than one transformer</li> <li>∞ on replacement, use a low loss transformer and with a loading of 40 – 75 %</li> </ul>	3.5.4
Use high efficiency/low loss transformers	At time of replacement, or where there is a lifetime cost benefit	3.5.4
Place equipment with a high current demand as close as possible to the power source (e.g. transformer)	When locating or relocating equipment	3.5.4

Table 4.4: Electrical power supply techniques to improve energy efficiency

### Electric motor driven sub-systems<sup>2</sup>

Electric motors are widely used in industry. Replacement by electrically efficient motors (EEMs) and variable speed drives (VSDs) is one of the easiest measures when considering energy efficiency. However, this should be done in the context of considering the whole system the motor sits in, otherwise there are risks of:

- losing the potential benefits of optimising the use and size of the systems, and subsequently optimising the motor drive requirements
- losing energy if a VSD is applied in the wrong context.

The key systems using electric motors are:

- compressed air (CAS, see Section 3.7)
- pumping (see Section 3.8)

The installation will include a large number of motors, many of which are incorporated directly as part of individual machinery.

As much as possible, motors with higher efficiencies will be preferred. VSD motors will be used throughout the plant both for large motors and for small motors requiring variable speeds.

The large pulpers' motors will also be equipped with a cooling system to improve its efficiency.

<sup>2</sup> In this document 'system' is used to refer to a set of connected items or devices which operate together for a specific purpose, e.g. ventilation, CAS. See the discussion on system boundaries in Sections 1.3.5 and 1.5.1. These systems usually include motor sub-systems (or component systems).

Aspect of BAT	BAT	Status at Installation
	<ul style="list-style-type: none"> <li>○ heating, ventilation and air conditioning (see Section 3.9)</li> <li>○ cooling (see the ICS BREF).</li> </ul> <p>BAT is to optimise electric motors in the following order (see Section 3.6):</p> <ol style="list-style-type: none"> <li>1. optimise the entire system the motor(s) is part of (e.g. cooling system, see Section 1.5.1)</li> <li>2. then optimise the motor(s) in the system according to the newly-determined load requirements, by applying one or more of the techniques in Figure 3, according to applicability</li> <li>3. when the energy-using systems have been optimised, then optimise the remaining (non-optimised) motors according to Table 4.5 and criteria such as: <ul style="list-style-type: none"> <li>▪ prioritising the remaining motors running more than 2000 hrs per year for replacement with EEMs</li> <li>▪ electric motors driving a variable load operating at less than 50 % of capacity more than 20 % of their operating time, and operating for more than 2000 hours a year should be considered for equipping with variable speed drives.</li> </ul> </li> </ol>	<p>The entire system has been optimised at the design stage.</p> <p>Motors have been optimally sized according to requirements, and gears have been designed for optimum performance, depending on the application. Direct coupling has been used when possible (for example, for the pulpers and shredder motors).</p> <p>Motor repairs will be carried out by specialised contractors. Ordinary maintenance of motors will be included in the O&amp;M Manual.</p>
<b>Compressed air systems (CAS)</b>	<p>Compressed air is widely used as either part of a process or to provide mechanical energy. It is widely used where there is risk of explosion, ignition, etc. In many cases, it is used as an integral part of the process (such as providing low quality nitrogen as an inert atmosphere, and for blowing, moulding or mixing), and it is difficult to assess its mechanical efficiency. In some cases, e.g. where driving</p>	<p>Different compressor systems will be installed for separate uses in the plant, optimised according to the machinery they are associated with. Compressors will be located as close as possible to the system they are servicing to reduce air losses.</p> <p>Compressors are included in the plant mainly for</p>

Aspect of BAT	BAT	Status at Installation
	<p>small turbines such as assembly tools, it has a low overall efficiency, and where there are no health and safety constraints, replacement with other drives may be considered (see Section 3.7).</p> <p>BAT is to optimise compressed air systems (CAS) using the techniques such as those in Figure 4, according to applicability.</p>	<p>mechanical work, e.g. in the optical separation system, in the suspension buffer, the aeration tank and the WW pre-treatment plant, and to move pneumatic valves.</p> <p>Maintenance of compressors will be included in the O&amp;M Manual.</p>
<b>Pumping systems</b>	<p>Some 30 to 50 % of the energy consumed by pumping systems may be saved through equipment or control system changes (see Section 3.8).</p> <p>For electric motors used for driving pumps, see BAT “Electric motor driven sub-systems”. However, the use of VSDs (a key technique) is also mentioned in Figure 5.</p> <p>BAT is to optimise pumping systems by using the techniques in Figure 5, according to applicability (see Section 3.8).</p> <p>Note that throttle control is less energy wasteful than bypass control or no control. However, all are wasteful of energy and should be considered for replacement according to size of the pump and how frequently it is used.</p>	<p>Pump sizes have been optimised at the design stage. Pipework design has also been optimised, for instance by ensuring an optimal diameter (not too large to avoid settling, and not too small to avoid clogs, to facilitate flow, and avoid excessive pressure). Pipework length has also been kept as low as possible (where possible). Bends in the pipework have been minimised as far as possible.</p> <p>Pumps have been matched to the motor they will be associated with. VSDs will be used as required, depending on the size of the pump and the requirement for variable speed.</p> <p>The Control System will switch off any unnecessary pumps.</p> <p>Maintenance of pumps will be included in the O&amp;M Manual.</p>
<b>Heating, ventilation and air conditioning</b>	<p>A typical HVAC system comprises the equipment providing some or all of the following functions:</p>	<p>HVAC will be installed for ventilation and temperature control in the administration building and in the site operations office. There will be two systems – a ventilation</p>

Aspect of BAT	BAT	Status at Installation
<b>(HVAC) systems</b>	<ul style="list-style-type: none"> <li>• system heating (boilers, see Section 3.2; heat pumps, see Section 3.3.2, etc.)</li> <li>• cooling (see Section 3.3)</li> <li>• pumps (see Section 3.8)</li> <li>• heat exchangers (see Section 3.3.1) transferring or absorbing heat from a space or a process</li> <li>• space heating and cooling (Section 3.9.1)</li> <li>• ventilation by fans extracting or providing air through ducts, to or from heat exchangers and/or the external air (see Section 3.9.2).</li> </ul> <p>Studies have shown that about 60 % of the energy in an HVAC system is consumed by the chiller/heat pump and the remaining 40 % by peripheral machinery. Air conditioning is increasingly used across Europe, particularly in the south.</p> <p>Ventilation is essential for many industrial installations to function. It:</p> <ul style="list-style-type: none"> <li>• protects staff from pollutant and heat emissions within premises</li> <li>• maintains a clean working atmosphere to protect product quality.</li> </ul> <p>Requirements may be dictated by health, safety and process considerations (see Section 3.9).</p> <p>BAT is to optimise heating, ventilation and air conditioning systems by using techniques such as:</p> <ul style="list-style-type: none"> <li>• for ventilation, space heating and cooling, techniques in</li> </ul>	<p>system and a heating / cooling system. The system has been optimally designed for the proposed use.</p> <p>The intake air will be filtered to remove potential dust present in the surrounding air. This filter will be located inside the ventilation system air duct. Internal filters will also be located in the heating / cooling system to filter the internal air before it passes through this system.</p> <p>A VRF / VRV (Variable Refrigerant Flow / Variable Refrigerant Volume) system will be used, rather than a chiller system – this enables the adjustment of energy consumption according to the current heating / cooling requirements of the building.</p> <p>A Building Management System will be in place, with two central control panels controlling (a) the ventilation rate and (b) the maximum and minimum temperature boundaries. The temperature of individual rooms can then be fine-tuned by individual users for maximum comfort.</p> <p>The buildings will be thermally insulated, with a thermal transmittance value not greater than 0.044 W/m<sup>2</sup>K. All windows will be double-glazed. Rubber gaskets (weather stripping) will be installed around all air apertures, to ensure a tight seal. External doors will have automatic door closers.</p> <p>Maintenance of the HVAC system will be included in the O&amp;M Manual. This will include periodic replacement of</p>

Aspect of BAT	BAT	Status at Installation
	<p>Figure 6 according to applicability</p> <ul style="list-style-type: none"> <li>• for heating, see Sections 3.2 and 3.3.1, and BAT “Steam systems” and BAT “Heat recovery”</li> <li>• for pumping, see Section 3.8 and previous BAT “Pumping systems”</li> <li>• for cooling, chilling and heat exchangers, see the ICS BREF, as well as Section 3.3 and BAT “Heat recovery”.</li> </ul>	<p>ventilation filters for the external incoming air, as well as the internal filters.</p>
<b>Lighting</b>	<p>Health and safety at work is the priority criterion for lighting systems requirements. The energy of lighting systems can be optimised according to the specific use requirements, see Section 3.10.</p> <p>BAT is to optimise artificial lighting systems by using the techniques such as those in Figure 7 according to applicability (see Section 3.10).</p>	<p>The buildings have been designed to optimise the use of natural light. For example, 10% of the surface area in the halls is made of polycarbonate panels to allow natural light into the buildings.</p> <p>The plant will also operate on a single shift (during daytime hours), thus making maximum use of natural light.</p> <p>High pressure sodium lamps will be used in the outside areas. Two control systems will be in place: a photosensor will detect low light levels at the end of each day and turn on all lamps using two external lighting circuits; at midnight, a timer will switch off one of the two circuits, thus turning off half of the external lamps.</p> <p>Similarly inside large buildings (e.g. reception halls, the dry and wet mechanical treatment halls), more than one lighting circuit will be installed to facilitate adjustment of lighting levels. Metal iodide lamps will be installed inside large buildings, since very good visibility is required for better control of the process – these lamps emit a wide range of light wavelengths thus enabling good visibility.</p>

Aspect of BAT	BAT	Status at Installation
<b>Drying, separation and concentration processes</b>	<p>The separation of (usually) a solid from a liquid may be carried out by one or more stages. By optimising the process steps necessary to achieve the required product, substantial energy savings can be achieved. Energy efficiency may be optimised by using two or more techniques in combination (see Section 3.11).</p> <p>BAT is to optimise drying, separation and concentration processes by using techniques such as those in Figure 8 according to applicability, and to seek opportunities to use mechanical separation in conjunction with thermal processes.</p>	<p>Fluorescent tubes will be installed indoors in other areas. Movement sensors will also be installed in the bathrooms.</p> <p>The optimum technology has been selected to meet process requirements whilst improving energy efficiency.</p> <p>The removal of water will be based only on mechanical separation processes. No active drying (e.g. heating to evaporate the water) is proposed, thus reducing energy requirements.</p> <p>Concentration will occur at the thickener stage prior to anaerobic digestion (using sieving). Separation will occur at the dewatering stage after anaerobic digestion (using the centrifuge). The use of a thickener improves the efficiency of the digestion process, thus improving the overall energy efficiency of the plant.</p>

Figure 1:

	Techniques for sectors and associated activities where combustion is not covered by a vertical BREF				
	Techniques in the LCP BREF July 2006 by fuel type and section				Techniques in this document (the ENE BREF) by section
	Coal and lignite	Biomass and peat	Liquid fuels	Gaseous fuels	
Lignite pre-drying	4.4.2				
Coal gasification	4.1.9.1 4.4.2 7.1.2				
Fuel drying		5.1.2, 5.4.2 5.4.4			
Biomass gasification		5.4.2 7.1.2			
Bark pressing		5.4.2 5.4.4			
Expansion turbine to recover the energy content of pressurised gases				7.1.1 7.1.2 7.4.1 7.5.1	
Cogeneration 4.	5.5 6.1.8	5.3.3 5.5.4	4.5.5 6.1.8	7.1.6 7.5.2	3.4 Cogeneration
Advanced computerised control of combustion conditions for emission reduction and boiler performance	4.2.1 4.2.1.9 4.4.3 4.5.4	5.5.3 6	.2.1 6.2.1.1 6.4.2 6.5.3.1	7.4.2 7.5.2	
Use of the heat content of the flue-gas for district heating	4.4.3				
Low excess air	4.4.3 4.4.6	5.4.7	6.4.2 6.4.5	7.4.3	3.1.3 Reducing the mass flow of the flue-gases by reducing the excess air

	Techniques for sectors and associated activities where combustion is not covered by a vertical BREF				
	Techniques in the LCP BREF July 2006 by fuel type and section				Techniques in this document (the ENE BREF) by section
	Coal and lignite	Biomass and peat	Liquid fuels	Gaseous fuels	
Lowering of exhaust gas temperatures	4.4.3		6.4.2		3.1.1 Reduction of the flue-gas temperature by: <ul style="list-style-type: none"> <li>∞ dimensioning for the maximum performance plus a calculated safety factor for surcharges</li> <li>∞ increasing heat transfer to the process by increasing either the heat transfer rate, or increasing or improving the heat transfer surfaces</li> <li>∞ heat recovery by combining an additional process (for example, steam generation by using economisers,) to recover the waste heat in the flue-gases</li> <li>∞ installing an air or water preheater or preheating the fuel by exchanging heat with flue-gases (see 3.1.1 and 3.1.1.1). Note that the process can require air preheating when a high flame temperature is needed (glass, cement, etc.)</li> </ul>

					∞ cleaning of heat transfer surfaces that are progressively covered by ashes or carbonaceous particulates, in order to maintain high heat transfer efficiency. Soot blowers operating periodically may keep the convection zones clean. Cleaning of the heat transfer surfaces in the combustion zone is generally made during inspection and maintenance shutdown, but online cleaning can be applied in some cases (e.g. refinery heaters)
Low CO concentration in the flue-gas	4.4.3		6.4.2		
Heat accumulation			6.4.2	7.4.2	
Cooling tower discharge	4.4.3		6.4.2		
Different techniques for the cooling system (see the ICS BREF)	4.4.3		6.4.2		

	Techniques for sectors and associated activities where combustion is not covered by a vertical BREF				
	Techniques in the LCP BREF July 2006 by fuel type and section				Techniques in this document (the ENE BREF) by section
	Coal and lignite	Biomass and peat	Liquid fuels	Gaseous fuels	
Preheating of fuel gas by using waste heat				7.4.2	3.1.1 Reduction of the flue-gas temperature: ∞ preheating the fuel by exchanging heat with flue-gases (see 3.1.1). Note that the process can require air preheating when a high flame temperature is needed (glass, cement, etc.)
Preheating of combustion air				7.4.2	3.1.1 Reduction of the flue-gas temperature: ∞ installing an air preheater by exchanging heat with flue-gases (see 3.1.1.1). Note that the process can require air preheating when a high flame temperature is needed (glass, cement, etc.)
Recuperative and regenerative burners					3.1.2
Burner regulation and control					3.1.4
Fuel choice					Note that the use of non-fossil fuels may be more sustainable, even if the ENE in use is lower
Oxy-firing (oxyfuel)					3.1.6
Reducing heat losses by insulation					3.1.7
Reducing losses through furnace doors					3.1.8
Fluidised bed combustion	4.1.4.2 5	2.3			

Table 4.1: Combustion system techniques to improve energy efficiency

Figure 2:

<b>Techniques for sectors and associated activities where steam systems are not covered by a vertical BREF</b>		
<b>Techniques in the ENE BREF</b>		
	<i>Benefits</i>	<i>Section in this document</i>
<b>DESIGN</b>		
Energy efficient design and installation of steam distribution pipework	Optimises energy savings	2.3
Throttling devices and the use of backpressure turbines: utilise backpressure turbines instead of PRVs	Provides a more efficient method of reducing steam pressure for low pressure services. Applicable when size and economics justify the use of a turbine	
<b>OPERATING AND CONTROL</b>		
Improve operating procedures and boiler controls	Optimises energy savings	3.2.4
Use sequential boiler controls (apply only to sites with more than one boiler)	Optimises energy savings	3.2.4
Install flue-gas isolation dampers (applicable only to sites with more than one boiler)	Optimises energy savings	3.2.4

<b>GENERATION</b>		
Preheat feed-water by using: <ul style="list-style-type: none"> <li>∞ waste heat, e.g. from a process</li> <li>∞ economisers using combustion air</li> <li>∞ deaerated feed-water to heat condensate</li> <li>∞ condensing the steam used for stripping and heating the feed water to the deaerator via a heat exchanger</li> </ul>	Recovers available heat from exhaust gases and transfers it back into the system by preheating feed-water	3.2.5 3.1.1
Prevention and removal of scale deposits on heat transfer surfaces. (Clean boiler heat transfer surfaces)	Promotes effective heat transfer from the combustion gases to the steam	3.2.6
Minimise boiler blowdown by improving water treatment. Install automatic total dissolved solids control	Reduces the amount of total dissolved solids in the boiler water, which allows less blowdown and therefore less energy loss	3.2.7
Add/restore boiler refractory	Reduces heat loss from the boiler and restores boiler efficiency	3.1.7 2.9
Optimise deaerator vent rate	Minimises avoidable loss of steam	3.2.8
Minimise boiler short cycling losses	Optimises energy savings	3.2.9
Carrying out boiler maintenance		2.9

<b>DISTRIBUTION</b>		
Optimise steam distribution systems (especially to cover the issues below)		2.9 and 3.2.10
Isolate steam from unused lines	Minimises avoidable loss of steam and reduces energy loss from piping and equipment surfaces	3.2.10
Insulation on steam pipes and condensate return pipes. (Ensure that steam system piping, valves, fittings and vessels are well insulated)	Reduces energy loss from piping and equipment surfaces	3.2.11 and 3.2.11.1
Implement a control and repair programme for steam traps	Reduces passage of live steam into the condensate system and promotes efficient operation of end-use heat transfer equipment. Minimises avoidable loss of steam	3.2.12
<b>RECOVERY</b>		
Collect and return condensate to the boiler for re-use. (Optimise condensate recovery)	Recovers the thermal energy in the condensate and reduces the amount of makeup water added to the system, saving energy and chemicals treatment	3.2.13
Re-use of flash-steam. (Use high pressure condensate to make low pressure steam)	Exploits the available energy in the returning condensate	3.2.14
Recover energy from boiler blowdown	Transfers the available energy in a blowdown stream back into the system, thereby reducing energy loss	3.2.15

<b>Techniques in the LCP BREF July 2006 by fuel type and by section</b>				
	<i>Coal and lignite</i>	<i>Biomass and peat</i>	<i>Liquid fuels</i>	<i>Gaseous fuels</i>
Expansion turbine to recover the energy content of pressurised gases				7.4.1 and 7.5.1
Change turbine blades	4.4.3	5.4.4	6.4.2	
Use advanced materials to reach high steam parameters	4.4.3		6.4.2	7.4.2
Supercritical steam parameters	4.4.3, 4.5.5		6.4.2	7.1.4
Double reheat	4.4.3, 4.5.5		6.4.2, 6.5.3.1	7.1.4, 7.4.2, 7.5.2
Regenerative feed-water	4.2.3, 4.4.3	5.4.4	6.4.2	7.4.2
Use of heat content of the flue-gas for district heating	4.4.3			
Heat accumulation			6.4.2	7.4.2
Advanced computerised control of the gas turbine and subsequent recovery boilers				7.4.2

**Table 4.2: Steam system techniques to improve energy efficiency**

Figure 3:

Driven system energy savings measure	Applicability	Section in this document <sup>1</sup>
<b>SYSTEM INSTALLATION or REFURBISHMENT</b>		
Using energy efficient motors (EEM)	Lifetime cost benefit	3.6.1
Proper motor sizing	Lifetime cost benefit	3.6.2
Installing variable speed drives (VSD)	Use of VSDs may be limited by security and safety requirements. According to load. Note in multi-machine systems with variable load systems (e.g. CAS) it may be optimal to use only one VSD motor	3.6.3
Installing high efficiency transmission/reducers	Lifetime cost benefit	3.6.4
Use: ∞ direct coupling where possible ∞ synchronous belts or cogged V-belts in place of V belts ∞ helical gears in place of worm gears	All	3.6.4
Energy efficient motor repair (EEMR) or replacement with an EEM	At time of repair	3.6.5
Rewinding: avoid rewinding and replace with an EEM, or use a certified rewinding contractor (EEMR)	At time of repair	3.6.6
Power quality control	Lifetime cost benefit	3.5
<b>SYSTEM OPERATION and MAINTENANCE</b>		
Lubrication, adjustments, tuning	All cases	2.9
Note <sup>1</sup> : Cross-media effects, Applicability and Economics are given in Section 3.6.7		

Table 4.5: Electric motor techniques to improve energy efficiency

Figure 4:

Technique	Applicability	Section in this document
<b>SYSTEM DESIGN, INSTALLATION or REFURBISHMENT</b>		
Overall system design, including multi-pressure systems	New or significant upgrade	3.7.1
Upgrade compressor	New or significant upgrade	3.7.1
Improve cooling, drying and filtering	This does not include more frequent filter replacement (see below)	3.7.1
Reduce frictional pressure losses (for example by increasing pipe diameter)	New or significant upgrade	3.7.1
Improvement of drives (high efficiency motors)	Most cost effective in small (<10 kW) systems	3.7.2, 3.7.3, 3.6.4
Improvement of drives (speed control)	Applicable to variable load systems. In multi-machine installations, only one machine should be fitted with a variable speed drive	3.7.2
Use of sophisticated control systems		3.7.4
Recover waste heat for use in other functions	Note that the gain is in terms of energy, not of electricity consumption, since electricity is converted to useful heat	3.7.5
Use external cool air as intake	Where access exists	3.7.8
Storage of compressed air near highly-fluctuating uses	All cases	3.7.10
<b>SYSTEM OPERATION and MAINTENANCE</b>		
Optimise certain end use devices	All cases	3.7.1
Reduce air leaks	All cases. Largest potential gain	3.7.6
More frequent filter replacement	Review in all cases	3.7.7
Optimise working pressure	All cases	3.7.9

Table 4.6: Compressed air system techniques to improve energy efficiency

Figure 5:

Technique	Applicability	Section in this document	Additional information
<b>DESIGN</b>			
Avoid oversizing when selecting pumps and replace oversized pumps	For new pumps: all cases For existing pumps: lifetime cost benefit	3.8.1 3.8.2	Largest single source of pump energy wastage
Match the correct choice of pump to the correct motor for the duty	For new pumps: all cases For existing pumps: lifetime cost benefit	3.8.2 3.8.6	
Design of pipework system (see Distribution system, below)		3.8.3	
<b>CONTROL and MAINTENANCE</b>			
Control and regulation system	All cases	3.8.5	
Shut down unnecessary pumps	All cases	3.8.5	
Use of variable speed drives (VSDs)	Lifetime cost benefit. Not applicable where flows are constant	3.8.5	See BAT 24, in Section 4.3.6
Use of multiple pumps (staged cut in)	When the pumping flow is less than half the maximum single capacity	3.8.5	
Regular maintenance. Where unplanned maintenance becomes excessive, check for: ∞ cavitation ∞ wear ∞ wrong type of pump	All cases. Repair or replace as necessary	3.8.4	

<b>DISTRIBUTION SYSTEM</b>			
Minimise the number of valves and bends commensurate with keeping ease of operation and maintenance	All cases at design and installation (including changes). May need qualified technical advice	3.8.3	
Avoiding using too many bends (especially tight bends)	All cases at design and installation (including changes). May need qualified technical advice	3.8.3	
Ensuring the pipework diameter is not too small (correct pipework diameter)	All cases at design and installation (including changes). May need qualified technical advice	3.8.3	

**Table 4.7: Pumping system techniques to improve energy efficiency**

Figure 6:

Energy savings measure	Applicability	Section in this document
<b>DESIGN and CONTROL</b>		
Overall system design. Identify and equip areas separately for: ∞ general ventilation ∞ specific ventilation ∞ process ventilation	New or significant upgrade. Consider for retrofit on lifetime cost benefit	3.9.1 3.9.2.1
Optimise the number, shape and size of intakes	New or upgrade	3.9.2.1
Use fans: ∞ of high efficiency ∞ designed to operate at optimal rate	Cost effective in all cases	3.9.2.1 3.9.2.2
Manage airflow, including considering dual flow ventilation	New or significant upgrade	3.9.2.1
Air system design: ∞ ducts are of a sufficient size ∞ circular ducts ∞ avoid long runs and obstacles such as bends, narrow sections	New or significant upgrade	3.9.2.1
Optimise electric motors, and consider installing a VSD	All cases. Cost effective retrofit	3.9.2.1, 3.9.2.2, 3.6, 3.6.3, 3.6.7 and BAT 24
Use automatic control systems. Integrate with centralised technical management systems	All new and significant upgrades. Cost effective and easy upgrade in all cases	3.9.2.1 3.9.2.2
Integration of air filters into air duct system and heat recovery from exhaust air (heat exchangers)	New or significant upgrade. Consider for retrofit on lifetime cost benefit. The following issues need to be taken into account: the thermal efficiency, the pressure loss, and the need for regular cleaning	3.9.2.1 3.9.2.2

<p>Reduce heating/cooling needs by:</p> <ul style="list-style-type: none"> <li>∞ building insulation</li> <li>∞ efficient glazing</li> <li>∞ air infiltration reduction</li> <li>∞ automatic closure of doors</li> <li>∞ destratification</li> <li>∞ lowering of temperature set point during non-production period (programmable regulation)</li> <li>∞ reduction of the set point for heating and raising it for cooling</li> </ul>	Consider in all cases and implement according to cost benefit	3.9.1
<p>Improve the efficiency of heating systems through:</p> <ul style="list-style-type: none"> <li>∞ recovery or use of wasted heat (Section 3.3.1)</li> <li>∞ heat pumps</li> <li>∞ radiative and local heating systems coupled with reduced temperature set points in the non occupied areas of the buildings</li> </ul>	Consider in all cases and implement according to cost benefit	3.9.1
<p>Improve the efficiency of cooling systems through the use of free cooling</p>	Applicable in specific circumstances	3.9.3
<b>MAINTENANCE</b>		
Stop or reduce ventilation where possible	All cases	3.9.2.2
Ensure system is airtight, check joints	All cases	3.9.2.2
Check system is balanced	All cases	3.9.2.2
Manage airflow: optimise	All cases	3.9.2.2
<p>Air filtering, optimise:</p> <ul style="list-style-type: none"> <li>∞ recycling efficiency</li> <li>∞ pressure loss</li> <li>∞ regular filter cleaning/replacement</li> <li>∞ regular cleaning of system</li> </ul>	All cases	3.9.2.2

**Table 4.8: Heating, ventilation and air conditioning system techniques to improve energy efficiency**

Figure 7:

Technique	Applicability
<b>ANALYSIS and DESIGN OF LIGHTING REQUIREMENTS</b>	
Identify illumination requirements in terms of both intensity and spectral content required for the intended task	All cases
Plan space and activities in order to optimise the use of natural light	Where this can be achieved by normal operational or maintenance rearrangements, consider in all cases. If structural changes, e.g. building work, is required, new or upgraded installations
Selection of fixtures and lamps according to specific requirements for the intended use	Cost benefit on lifetime basis
<b>OPERATION, CONTROL, and MAINTENANCE</b>	
Use of lighting management control systems including occupancy sensors, timers, etc.	All cases
Train building occupants to utilise lighting equipment in the most efficient manner	All cases

**Table 4.9: Lighting system techniques to improve energy efficiency**

Figure 8:

Technique	Applicability	Additional information	Section in this document
<b>DESIGN</b>			
Select the optimum separation technology or combination of techniques (below) to meet the specific process equipments	All cases		3.11.1
<b>OPERATION</b>			
Use of surplus heat from other processes	Depends on the availability of surplus heat in the installation (or from third party)	Drying is a good use for surplus heat	3.11.1
Use a combination of techniques	Consider in all cases	May have production benefits, e.g. improved product quality, increased throughput	3.11.1
Mechanical processes, e.g. filtration, membrane filtration	Process dependent. To achieve high dryness at lowest energy consumption, consider these in combination with other techniques	Energy consumption can be several orders of magnitude lower, but will not achieve high % dryness	3.11.2
Thermal processes, e.g. ∞ directly heated dryers ∞ indirectly heated dryers ∞ multiple effect	Widely used, but efficiency can be improved by considering other options in this table	Convective (direct) heat dryers may be the option with the lowest energy efficiency	3.11.3 3.11.3.1 3.11.3.2 3.11.3.3 3.11.3.6
Direct drying	See thermal and radiant techniques, and superheated steam	Convective (direct) heat dryers may be the option with the lowest energy efficiency	3.11.3.2

Superheated steam	Any direct dryers can be retrofitted with superheated steam. High cost, needs lifetime cost benefit assessment. High temperature may damage product	Heat can be recovered from this process	3.11.3.4
Heat recovery (including MVR and heat pumps)	Consider for almost any continuous hot air convective dryers	3.	11.1 3.11.3.5 3.11.3.6
Optimise insulation of the drying system	Consider for all systems. Can be retrofitted		3.11.3.7
Radiation processes e.g. ∞ infrared (IR) ∞ high frequency (HF) ∞ microwave (MW)	Can be easily retrofitted. Direct application of energy to component to be dried. They are compact and Reduce the need for air extraction. IR limited by substrate dimensions. High cost, needs lifetime cost benefit assessment	More efficient heating. Can boost production throughput coupled with convection or conduction	3.11.4
<b>CONTROL</b>			
Process automation in thermal drying processes	All cases	Savings of between 5 and 10 % can be achieved compared with using traditional empirical controllers	3.11.5

**Table 4.10: Drying, separation and concentration system techniques to improve energy efficiency**

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<sup>i</sup> There is a split view from three Member States, because in their view, on sites where significant VOC emissions are to be expected (e.g. refineries, petrochemical plants and oil terminals), BAT is to calculate the VOC emissions regularly with validated calculation methods, and because of uncertainties in the calculation methods, emissions from the plants should be monitored occasionally in order to quantify the emissions and to give basic data for refining calculation methods. This can be carried out by using DIAL techniques. The necessity and frequency of emission monitoring needs to be decided on a case-by-case basis.

<sup>ii</sup> There is a split view from industry, that this technique is not BAT because in their view:

- a) there is no definition of ‘volatile’ in this BREF
- b) there is no test of environmental significance
- c) products which may be dangerous to the environment, but not classed as toxic, are not captured
- d) it can be demonstrated that other emission control measures may provide a higher level of environmental protection taking into account the costs and advantages of the various techniques
- e) there are no commonly understood performance criteria for a vapour treatment installation
- f) this does not take into account the cost, or advantages of other techniques
- g) this does not provide the flexibility to take into account the technical characteristics of the installation concerned, its geographical location and the local environmental conditions
- h) there is no proportionality in this conclusion.

<sup>iii</sup> There is a split view from industry, that this technique is not BAT because in their view:

- a) there is no definition of ‘volatile’ in this BREF
- b) there is no test of environmental significance
- c) products which may be dangerous to the environment, but not classed as toxic, are not captured
- d) it can be demonstrated that other emission control measures may provide a higher level of environmental protection taking into account the costs and advantages of the various techniques
- e) there are no commonly understood performance criteria for a vapour treatment installation
- f) this does not take into account the costs or advantages of other techniques
- g) this does not provide the flexibility to take into account the technical characteristics of the installation concerned, its geographical location and the local environmental conditions
- h) there is no proportionality in this conclusion.

<sup>iv</sup> There is a split view from industry, that this technique is not BAT because in their view:

- a) there is no definition of ‘volatile’ in this BREF

- 
- b) there is no test of environmental significance
  - c) products which may be dangerous to the environment, but not classed as toxic, are not captured
  - d) it can be demonstrated that other emission control measures may provide a higher level of environmental protection taking into account the costs and advantages of the various techniques
  - e) there are no commonly understood performance criteria for a vapour treatment installation
  - f) this does not take into account the costs or advantages of other techniques
  - g) this does not provide the flexibility to take into account the technical characteristics of the installation concerned, its geographical location and the local environmental conditions
  - h) there is no proportionality in this conclusion.