



IPPC BAT Conclusions

COMMISSION IMPLEMENTING DECISION (EU) 2018/11747 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council

BEST AVAILABLE TECHNIQUES (BAT) CONCLUSIONS FOR WASTE

SCOPE

These BAT conclusions concern the following activities specified in Annex I to Directive 2010/75/EU, namely:

5.1. Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities:

- (a) biological treatment;
- (b) physico-chemical treatment;
- (c) blending or mixing prior to submission to any of the other activities listed in points 5.1 and 5.2 of Annex I to Directive 2010/75/EU;
- (d) repackaging prior to submission to any of the other activities listed in points 5.1 and 5.2 of Annex I to Directive 2010/75/EU;
- (e) solvent reclamation/regeneration;
- (f) recycling/reclamation of inorganic materials other than metals or metal compounds;
- (g) regeneration of acids or bases;
- (h) recovery of components used for pollution abatement;
- (i) recovery of components from catalysts;
- (j) oil re-refining or other reuses of oil;

5.3.(a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC [\(1\)](#):

- (i) biological treatment;
- (ii) physico-chemical treatment;
- (iii) pre-treatment of waste for incineration or co-incineration;
- (iv) treatment of ashes;
- (v) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

(b) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, and excluding activities covered by Directive 91/271/EEC:

- (i) biological treatment;
- (ii) pre-treatment of waste for incineration or co-incineration;
- (iii) treatment of ashes;
- (iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

When the only waste treatment activity carried out is anaerobic digestion, the capacity threshold for this activity shall be 100 tonnes per day.

5.5. Temporary storage of hazardous waste not covered under point 5.4 of Annex I to Directive 2010/75/EU pending any of the activities listed in points 5.1, 5.2, 5.4 and 5.6 of Annex I to Directive 2010/75/EU with a total capacity exceeding 50 tonnes, excluding temporary storage, pending collection, on the site where the waste is generated.

6.11. Independently operated treatment of waste water not covered by Directive 91/271/EEC and discharged by an installation undertaking activities covered under points 5.1, 5.3 or 5.5 as listed above.

Referring to independently operated treatment of waste water not covered by Directive 91/271/EEC above, these BAT conclusions also cover the combined treatment of waste water from different origins if the main pollutant load originates from the activities covered under points 5.1, 5.3 or 5.5 as listed above.

These BAT conclusions do not address the following:

- Surface impoundment.
- Disposal or recycling of animal carcasses or of animal waste covered by the activity description in point 6.5 of Annex I to Directive 2010/75/EU when this is covered by the BAT conclusions on the slaughterhouses and animal by-products industries (SA).
- On-farm processing of manure when this is covered by the BAT conclusions for the intensive rearing of poultry or pigs (IRPP).
- Direct recovery (i.e. without pretreatment) of waste as a substitute for raw materials in installations carrying out activities covered by other BAT conclusions, e.g.:
 - o Direct recovery of lead (e.g. from batteries), zinc or aluminium salts or recovery of the metals from catalysts. This may be covered by the BAT conclusions for the non-ferrous metals industries (NFM).
 - o Processing of paper for recycling. This may be covered by the BAT conclusions for the production of pulp, paper and board (PP).
 - o Use of waste as fuel/raw material in cement kilns. This may be covered by the BAT conclusions for the production of cement, lime and magnesium oxide (CLM).
- Waste (co-)incineration, pyrolysis and gasification. This may be covered by the BAT conclusions for waste incineration (WI) or the BAT conclusions for large combustion plants (LCP).
- Landfill of waste. This is covered by Council Directive 1999/31/EC [\(2\)](#). In particular, underground permanent and long-term storage (≥ 1 year before disposal, ≥ 3 years before recovery) are covered by Directive 1999/31/EC.
- *In situ* remediation of contaminated soil (i.e. unexcavated soil).
- Treatment of slags and bottom ashes. This may be covered by the BAT conclusions for waste incineration (WI) and/or the BAT conclusions for large combustion plants (LCP).
- Smelting of scrap metals and metal-bearing materials. This may be covered by the BAT conclusions for non-ferrous metals industries (NFM), the BAT conclusions for iron and steel production (IS), and/or the BAT conclusions for the smitheries and foundries industry (SF).
- Regeneration of spent acids and alkalis when this is covered by the BAT conclusions for ferrous metals processing.

- Combustion of fuels when it does not generate hot gases which come into direct contact with the waste. This may be covered by the BAT conclusions for large combustion plants (LCP) or by Directive (EU) 2015/2193 of the European Parliament and of the Council [\[3\]](#).

Other BAT conclusions and reference documents which could be relevant for the activities covered by these BAT conclusions are the following:

- Economics and cross-media effects (ECM);
- Emissions from storage (EFS);
- Energy efficiency (ENE);
- Monitoring of emissions to air and water from IED installations (ROM);
- Production of cement, lime and magnesium oxide (CLM);
- Common waste water and waste gas treatment/management systems in the chemical sector (CWW);
- Intensive rearing of poultry or pigs (IRPP).

These BAT conclusions apply without prejudice to the relevant provisions of EU legislation, e.g. the waste hierarchy.

DEFINITIONS

For the purposes of these BAT conclusions, the following **definitions** apply:

Term used	Definition
General terms	
Channelled emissions	Emissions of pollutants into the environment through any kind of duct, pipe, stack, etc. This also includes emissions from open-top biofilters.
Continuous measurement	Measurement using an ‘automated measuring system’ permanently installed on site.
Declaration of cleanliness	Written document provided by the waste producer/holder certifying that the empty waste packaging concerned (e.g. drums, containers) is clean with respect to the acceptance criteria.
Diffuse emissions	Non-channelled emissions (e.g. of dust, organic compounds, odour) which can result from ‘area’ sources (e.g. tanks) or ‘point’ sources (e.g. pipe flanges). This also includes emissions from open-air windrow composting.
Direct discharge	Discharge to a receiving water body without further downstream waste water treatment.
Emissions factors	Numbers that can be multiplied by known data such as plant/process data or throughput data to estimate emissions.
Existing plant	A plant that is not a new plant.
Flaring	High-temperature oxidation to burn combustible compounds of waste gases from industrial operations with an open flame. Flaring is primarily used for burning off flammable gas for safety reasons or during non-routine operating conditions.
Fly ashes	Particles from the combustion chamber or formed within the flue-gas stream, that are transported in the flue-gas.
Fugitive emissions	Diffuse emissions from ‘point’ sources.
Hazardous waste	Hazardous waste as defined in point 2 of Article 3 of Directive 2008/98/EC.
Indirect discharge	Discharge which is not a direct discharge.
Liquid biodegradable waste	Waste of biological origin with a relatively high water content (e.g. fat separator contents, organic sludges, catering waste).
Major plant upgrade	A major change in the design or technology of a plant with major adjustments or replacements of the process and/or abatement technique(s) and associated equipment.
Mechanical biological treatment (MBT)	Treatment of mixed solid waste combining mechanical treatment with biological treatment such as aerobic or anaerobic treatment.
New plant	A plant first permitted at the site of the installation following the publication of these BAT conclusions or a complete replacement of a plant following the publication of these BAT conclusions.
Output	The treated waste exiting the waste treatment plant.
Pasty waste	Sludge which is not free-flowing.
Periodic measurement	Measurement at specified time intervals using manual or automated methods.
Recovery	Recovery as defined in Article 3(15) of Directive 2008/98/EC.
Re-refining	Treatments carried out on waste oil to transform it to base oil.

Regeneration	Treatments and processes mainly designed to make the treated materials (e.g. spent activated carbon or spent solvent) suitable again for a similar use.
Sensitive receptor	Area which needs special protection, such as: — residential areas; — areas where human activities are carried out (e.g. neighbouring workplaces, schools, daycare centres, recreational areas, hospitals or nursing homes).
Surface impoundment	Placement of liquid or sludgy discards into pits, ponds, lagoons, etc.
Treatment of waste with calorific value	Treatment of waste wood, waste oil, waste plastics, waste solvents, etc. to obtain a fuel or to allow a better recovery of its calorific value.
VFCs	Volatile (hydro)fluorocarbons: VOCs consisting of fluorinated (hydro)carbons, in particular chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs).
VHCs	Volatile hydrocarbons: VOCs consisting entirely of hydrogen and carbon (e.g. ethane, propane, iso-butane, cyclopentane).
VOC	Volatile organic compound as defined in Article 3(45) of Directive 2010/75/EU.
Waste holder	Waste holder as defined in Article 3(6) of Directive 2008/98/EC of the European Parliament and of the Council (4) .
Waste input	The incoming waste to be treated in the waste treatment plant.
Water-based liquid waste	Waste consisting of aqueous liquids, acids/alkalis or pumpable sludges (e.g. emulsions, waste acids, aqueous marine waste) which is not liquid biodegradable waste.
Pollutants/parameters	
AOX	Adsorbable organically bound halogens, expressed as Cl, include adsorbable organically bound chlorine, bromine and iodine.
Arsenic	Arsenic, expressed as As, includes all inorganic and organic arsenic compounds, dissolved or bound to particles.
BOD	Biochemical oxygen demand. Amount of oxygen needed for the biochemical oxidation of organic and/or inorganic matter in five (BOD ₅) or in seven (BOD ₇) days.
Cadmium	Cadmium, expressed as Cd, includes all inorganic and organic cadmium compounds, dissolved or bound to particles.
CFCs	Chlorofluorocarbons: VOCs consisting of carbon, chlorine and fluorine.
Chromium	Chromium, expressed as Cr, includes all inorganic and organic chromium compounds, dissolved or bound to particles.
Hexavalent chromium	Hexavalent chromium, expressed as Cr(VI), includes all chromium compounds where the chromium is in the oxidation state +6.
COD	Chemical oxygen demand. Amount of oxygen needed for the total chemical oxidation of the organic matter to carbon dioxide. COD is an indicator for the mass concentration of organic compounds.
Copper	Copper, expressed as Cu, includes all inorganic and organic copper compounds, dissolved or bound to particles.
Cyanide	Free cyanide, expressed as CN ⁻ .
Dust	Total particulate matter (in air).
HOI	Hydrocarbon oil index. The sum of compounds extractable with a hydrocarbon solvent (including long-chain or branched aliphatic, alicyclic, aromatic or alkyl-substituted aromatic hydrocarbons).
HCl	All inorganic gaseous chlorine compounds, expressed as HCl.
HF	All inorganic gaseous fluorine compounds, expressed as HF.

H₂S	Hydrogen sulphide. Carbonyl sulphide and mercaptans are not included.
Lead	Lead, expressed as Pb, includes all inorganic and organic lead compounds, dissolved or bound to particles.
Mercury	Mercury, expressed as Hg, includes elementary mercury and all inorganic and organic mercury compounds, gaseous, dissolved or bound to particles.
NH₃	Ammonia.
Nickel	Nickel, expressed as Ni, includes all inorganic and organic nickel compounds, dissolved or bound to particles.
Odour concentration	Number of European Odour Units (ou _E) in one cubic metre at standard conditions measured by dynamic olfactometry according to EN 13725.
PCB	Polychlorinated biphenyl.
Dioxin-like PCBs	Polychlorinated biphenyls as listed in Commission Regulation (EC) No 199/2006 (5) .
PCDD/F	Polychlorinated dibenzo- <i>p</i> -dioxin/furan(s).
PFOA	Perfluorooctanoic acid.
PFOS	Perfluorooctanesulphonic acid.
Phenol index	The sum of phenolic compounds, expressed as phenol concentration and measured according to EN ISO 14402.
TOC	Total organic carbon, expressed as C (in water), includes all organic compounds.
Total N	Total nitrogen, expressed as N, includes free ammonia and ammonium nitrogen (NH ₄ -N), nitrite nitrogen (NO ₂ -N), nitrate nitrogen (NO ₃ -N) and organically bound nitrogen.
Total P	Total phosphorus, expressed as P, includes all inorganic and organic phosphorus compounds, dissolved or bound to particles
TSS	Total suspended solids. Mass concentration of all suspended solids (in water), measured via filtration through glass fibre filters and gravimetry.
TVOC	Total volatile organic carbon, expressed as C (in air).
Zinc	Zinc, expressed as Zn, includes all inorganic and organic zinc compounds, dissolved or bound to particles.

For the purposes of these BAT conclusions, the following acronyms apply:

Acronym	Definition
EMS	Environmental management system
EoLVs	End-of-life vehicles (as defined in Article 2(2) of Directive 2000/53/EC of the European Parliament and of the Council (6))
HEPA	High-efficiency particle air (filter)
IBC	Intermediate bulk container
LDAR	Leak detection and repair
LEV	Local exhaust ventilation system

POP	Persistent organic pollutant (as listed in Regulation (EC) No 850/2004 of the European Parliament and of the Council (7))
WEEE	Waste electrical and electronic equipment (as defined in Article 3(1) of Directive 2012/19/EU of the European Parliament and of the Council (8))

General Considerations:

Best Available Techniques

The techniques listed and described in these BAT conclusions are neither prescriptive nor exhaustive. Other techniques may be used that ensure at least an equivalent level of environmental protection. Unless otherwise stated, the BAT conclusions are generally applicable.

Emission levels associated with BAT

Unless stated otherwise, emission levels associated with the best available techniques (BAT-AELs) for emissions to air given in these BAT conclusions refer to concentrations (mass of emitted substances per volume of waste gas) under the following standard conditions: dry gas at a temperature of 273,15 K and a pressure of 101,3 kPa, without correction for oxygen content, and expressed in µg/Nm³ or mg/Nm³.

For averaging periods of BAT-AELs for emissions to air, the following definitions apply.

Type of measurement	Averaging period	Definition
Continuous	Daily average	Average over a period of one day based on valid hourly or half-hourly averages.
Periodic	Average over the sampling period	Average value of three consecutive measurements of at least 30 minutes each (9).

Where continuous measurement is used, the BAT-AELs may be expressed as daily averages.

Emission levels associated with the best available techniques (BAT-AELs) for emissions to water

Unless stated otherwise, emission levels associated with the best available techniques (BAT-AELs) for emissions to water given in these BAT conclusions refer to concentrations (mass of emitted substances per volume of water), expressed in µg/l or mg/l.

Unless stated otherwise, averaging periods associated with the BAT-AELs refer to either of the following two cases:

- in the case of continuous discharge, daily average values, i.e. 24-hour flow-proportional composite samples;
- in the case of batch discharge, average values over the release duration taken as flow-proportional composite samples, or, provided that the effluent is appropriately mixed and homogeneous, a spot sample taken before discharge.

Time-proportional composite samples can be used provided that sufficient flow stability is demonstrated.

All BAT-AELs for emissions to water apply at the point where the emission leaves the installation.

Abatement efficiencies

The calculation of the average abatement efficiency referred to in these BAT conclusions (see Table 6.1) does not include, for COD and TOC, initial treatment steps aiming at separating the bulk organic content from the water-based liquid waste, such as evapo-condensation, emulsion breaking or phase separation.

General BAT conclusions

Kindly cross-reference to the relevant part of the application document for the various aspects below (as may be required) and include further justifications for the responses provided.

BAT conclusion	Status at Installation	ERA reply	Reply	ERA reply												
1. Environmental management systems																
<p>BAT 1 In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features:</p> <p>i. commitment of the management, including senior management;</p> <p>ii. definition, by the management, of an environmental policy that includes the continuous improvement of the environmental performance of the installation;</p> <p>iii. planning and establishing the necessary procedures, objectives and targets, in conjunction with financial planning and investment;</p> <p>iv. implementation of procedures paying particular attention to:</p> <p>a) structure and responsibility;</p> <p>b) recruitment, training, awareness and competence;</p> <p>c) communication;</p> <p>d) employee involvement;</p> <p>e) documentation;</p> <p>f) effective process control;</p> <p>g) maintenance programmes;</p>	<p>Is an Environmental Management System (EMS) being implemented as part of the installation process?</p> <p>If yes, does it incorporate the aforementioned features? (Ex: commitment of the management, planning and establishing the necessary procedures in conjunction with investment and financial planning etc.) If certain features are not incorporated in the current EMS kindly indicate a timeframe by when the EMS shall be updated to include all missing features <i>(as may be applicable to your operations)</i>.</p> <table><thead><tr><th>Features</th><th>Yes/No</th></tr></thead><tbody><tr><td>i. Commitment of the management, including senior management</td><td>Yes</td></tr><tr><td>ii. An environmental policy that includes the continuous improvement of the installation by the management</td><td>Yes</td></tr><tr><td>iii. Planning and establishing the necessary procedures, objectives and targets, in conjunction with financial planning and investment</td><td>Yes</td></tr><tr><td>iv. Implementation of procedures paying particular attention to : a) Structure and responsibility b) Recruitment, training, awareness and competence c) Communication d) Employee involvement e) Documenation f) Effective process control g) Maintenance programmes h) Emergency preparedness and response i) Safeguarding compliance with environmental legislation</td><td>Yes</td></tr><tr><td>v. checking performance and taking corrective action, paying particular attention to: a) monitoring and measurement (see also the Reference Report on Monitoring of emissions to Air and Water from IED installations — ROM); b) Corrective and preventive action c) Maintenance of records d) independent (where practicable) internal or external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;</td><td>Yes</td></tr></tbody></table>	Features	Yes/No	i. Commitment of the management, including senior management	Yes	ii. 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Implementation of procedures paying particular attention to : a) Structure and responsibility b) Recruitment, training, awareness and competence c) Communication d) Employee involvement e) Documenation f) Effective process control g) Maintenance programmes h) Emergency preparedness and response i) Safeguarding compliance with environmental legislation	Yes	v. checking performance and taking corrective action, paying particular attention to: a) monitoring and measurement (see also the Reference Report on Monitoring of emissions to Air and Water from IED installations — ROM); b) Corrective and preventive action c) Maintenance of records d) independent (where practicable) internal or external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;	Yes	<p>Noted, kindly provide a reply for (i). Kindly provide noise management plan and waste management plan as required by this BAT Conclusion. With respect to the inventory of waste gas and waste water kindly see further comments below.</p>	<p>Reply (i) The management is committed to improve the plant. In fact it ahs obtained permission for a larger storage area so that the material on site is spread better rather than higher. It is also committed to obtain additional machinery to treat waste.</p> <p>Please note that the current IPPC permit already requires annual noise monitoring. Frankly the latest noise monitoring which was done showed that the only place from where a minor change is felt is from the closest receptors so maybe one should reconsider the utilisation from seven different receptors which is just becoming a money wastage exercize since the reports clearly show that the sources of noise are not originating from the plant but from other sources.</p> <p>The frequency should also be addressed. Currently client is feeling that he has been burdened with too</p>	<p>The commitment needs to be endorsed by senior management.</p> <p><u>On the noise management plan</u></p> <p>The request to amend the noise monitoring programme is noted, the ERA will consider during the drating of ther permit provided that the variation proposal in Form C is updated accordingly. Kindly see replies in BAT 17.</p> <p><u>On waste management plan</u></p> <ul style="list-style-type: none">• Kindly see comments in regulatory consultation• Waste management plans should detail aspects at to how waste management practices related to BAT refered to herein will beaddressed including BAT 2, BAT 4
Features	Yes/No															
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<p>h) emergency preparedness and response;</p> <p>i) safeguarding compliance with environmental legislation;</p> <p>v. checking performance and taking corrective action, paying particular attention to:</p> <p>a) monitoring and measurement (see also the JRC Reference Report on Monitoring of emissions to Air and Water from IED installations — ROM);</p> <p>b) corrective and preventive action;</p> <p>c) maintenance of records;</p> <p>d) independent (where practicable) internal or external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;</p> <p>vi. review of the EMS and its continuing suitability, adequacy and effectiveness by senior management;</p> <p>vii. following the development of cleaner technologies;</p> <p>viii. consideration for the environmental impacts from the eventual decommissioning of the plant at the design stage of a new plant, and throughout its operating life;</p> <p>ix. application of sectoral benchmarking on a regular basis;</p> <p>x. waste stream management (see BAT 13).</p>	vi. review of the EMS and its continuing suitability, adequacy and effectiveness by senior management	Yes		many expensive reporting procedures which are impacting his operations and financial feasibility of the company.	Update: Commetns are still applicable
	vii. following the development of cleaner technologies	Yes			
	viii. consideration for the environmental impacts from the eventual decommissioning of the plant at the design stage of a new plant, and throughout its operating life	Yes			
	ix. application of sectoral benchmarking on a regular basis	Yes			
	x. waste management plan (see BAT 13)	Yes			
	Specifically for chemical sector activities, BAT is to incorporate the following features in the EMS:	N/A			
	i. on multi-operator installations/sites, establishment of a convention that sets out the roles, responsibilities and coordination of operating procedures of each plant operator in order to enhance the cooperation between the various operators				
	ii. establishment of inventories of waste water and waste gas streams (see BAT 2).	N/A			
	In some cases, the following features are part of the EMS :				
	i. odour management plan (see BAT 20)				
	ii. noise management plan (see BAT 22)	Yes			
<i>Further details may be provided in a separate document.</i>					

xi. establishment of inventories of waste water and waste gas streams (see BAT 2). xii. residues management plan (see description in Section 6.5); xiii. accident management plan (see description in Section 6.5); xiv. odour management plan (see BAT 20); xv. noise and vibration management plan (see BAT 22).				
Applicability	The scope (e.g. level of detail) and nature of the EMS (e.g. standardised or non-standardised) will be generally related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and amount of wastes processed).			

BAT 2			Which of the following techniques are used to assess environmental performance (kindly provide supporting documentation as evidence that such measures are being implemented): <i>Should any of the techniques below not be currently implemented on site, kindly provide a timeframe and proposal for their implementation.</i>	Noted.		See reply above concerning the Waste Management Plan.																													
In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques provided :																																			
<table><tr><th>Technique</th><th>Description</th></tr><tr><td>a. Set up and implement waste characterisation and pre- acceptance procedures</td><td>These procedures aim to ensure the technical (and legal) suitability of waste treatment operations for a particular waste prior to the arrival of the waste at the plant. They include procedures to collect information about the waste input and may include waste sampling and characterisation to achieve sufficient knowledge of the waste composition. Waste pre-acceptance procedures are risk-based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).</td></tr><tr><td>b. Set up and implement waste acceptance procedures</td><td>Acceptance procedures aim to confirm the characteristics of the waste, as identified in the pre-acceptance stage. These procedures define the elements to be verified upon the arrival of the waste at the plant as well as the waste acceptance and rejection criteria. They may include waste sampling, inspection and analysis. Waste acceptance procedures are risk-based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).</td></tr><tr><td>c. Set up and implement a waste tracking system and inventory</td><td>A waste tracking system and inventory aim to track the location and quantity of waste in the plant. It holds all the information generated during waste pre-acceptance procedures (e.g. date of arrival at the plant and unique reference number of the waste, information on the previous waste holder(s), pre-acceptance and acceptance analysis results, intended treatment route, nature and quantity of the waste held on site including all identified hazards), acceptance, storage, treatment and/or transfer off site. The waste tracking system is risk- based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).</td></tr></table>			Technique	Description	a. Set up and implement waste characterisation and pre- acceptance procedures	These procedures aim to ensure the technical (and legal) suitability of waste treatment operations for a particular waste prior to the arrival of the waste at the plant. 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b. Set up and implement waste acceptance procedures	Acceptance procedures aim to confirm the characteristics of the waste, as identified in the pre-acceptance stage. These procedures define the elements to be verified upon the arrival of the waste at the plant as well as the waste acceptance and rejection criteria. They may include waste sampling, inspection and analysis. Waste acceptance procedures are risk-based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).																																		
c. Set up and implement a waste tracking system and inventory	A waste tracking system and inventory aim to track the location and quantity of waste in the plant. It holds all the information generated during waste pre-acceptance procedures (e.g. date of arrival at the plant and unique reference number of the waste, information on the previous waste holder(s), pre-acceptance and acceptance analysis results, intended treatment route, nature and quantity of the waste held on site including all identified hazards), acceptance, storage, treatment and/or transfer off site. The waste tracking system is risk- based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).																																		
		Yes/No																																	
a.	Set up and implement waste characterisation and pre- acceptance procedures	Yes																																	
b.	Set up and implement waste acceptance procedures	Yes																																	
c.	Set up and implement a waste tracking system and inventory	Yes																																	
d.	Set up and implement an output quality management system	Yes																																	
e.	Ensure waste segregation	Yes																																	
f.	Ensure waste compatibility prior to mixing or blending of waste	Yes																																	
g.	Sort incoming solid waste	Yes																																	

d.	Set up and implement an output quality management system	This technique involves setting up and implementing an output quality management system, so as to ensure that the output of the waste treatment is in line with the expectations, using for example existing EN standards. This management system also allows the performance of the waste treatment to be monitored and optimised, and for this purpose may include a material flow analysis of relevant components throughout the waste treatment. The use of a material flow analysis is risk-based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).											
e.	Ensure waste segregation	Waste is kept separated depending on its properties in order to enable easier and environmentally safer storage and treatment. Waste segregation relies on the physical separation of waste and on procedures that identify when and where wastes are stored.											
f.	Ensure waste compatibility prior to mixing or blending of waste	Compatibility is ensured by a set of verification measures and tests in order to detect any unwanted and/or potentially dangerous chemical reactions between wastes (e.g. polymerisation, gas evolution, exothermal reaction, decomposition, crystallisation, precipitation) when mixing, blending or carrying out other treatment operations. The compatibility tests are risk-based considering, for example, the hazardous properties of the waste, the risks posed by the waste in terms of process safety, occupational safety and environmental impact, as well as the information provided by the previous waste holder(s).											
g.	Sort incoming solid waste	Sorting of incoming solid waste ⁽¹⁾ aims to prevent unwanted material from entering subsequent waste treatment process(es). It may include: <ul style="list-style-type: none">• manual separation by means of visual examinations;• ferrous metals, non-ferrous metals or all-metals separation;• optical separation, e.g. by near-infrared spectroscopy or X-ray systems;• density separation, e.g. by air classification, sink-float tanks, vibration tables;• size separation by screening/sieving.											
BAT 3 In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the following features: (i) information about the characteristics of the waste to be treated and the waste treatment processes, including: (a) simplified process flow sheets that show the origin of the emissions; (b) descriptions of process-integrated techniques and waste water/waste gas treatment at source including their performances; (ii) information about the characteristics of the waste water streams, such as: (a) average values and variability of flow, pH, temperature, and conductivity; (b) average concentration and load values of relevant substances and their variability (e.g.			Which of the following elements are included as part of the inventory relating wastewater? (kindly provide supporting documentation as evidence of the information requested below). (i) information about the characteristics of the waste to be treated and the waste treatment processes, including:	<table><tr><th>Features</th><th>Yes/No</th></tr><tr><td>a) simplified process flow sheets that show the origin of the emissions;</td><td>N/A</td></tr><tr><td>b) descriptions of process-integrated techniques and waste water/waste gas</td><td>N/A</td></tr></table>	Features	Yes/No	a) simplified process flow sheets that show the origin of the emissions;	N/A	b) descriptions of process-integrated techniques and waste water/waste gas	N/A	ERA is not in agreement with non-applicability statement included for BAT 3. An understanding of the environmental aspects of the process coupled with past monitoring results may contribute to the provision of	There is no process on site which uses water except that of sprayed water onto the shredder which eventually either ends up as steam or falls at the bottom of the machine	Noted.
Features	Yes/No												
a) simplified process flow sheets that show the origin of the emissions;	N/A												
b) descriptions of process-integrated techniques and waste water/waste gas	N/A												

<p>COD/TOC, nitrogen species, phosphorus, metals, priority substances / micropollutants);</p> <p>(c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);</p> <p>(iii) information about the characteristics of the waste gas streams, such as:</p> <p>(a) average values and variability of flow and temperature;</p> <p>(b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs);</p> <p>(c) flammability, lower and higher explosive limits, reactivity;</p> <p>(d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).</p> <p>Applicability</p> <p>The scope (e.g. level of detail) and nature of the inventory will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and amount of wastes processed).</p>	<table><tr><td>treatment at source including their performances;</td><td></td></tr></table> <p>(ii) information about the characteristics of the waste water streams, such as:</p> <table><tr><th>Features</th><th>Yes/No</th></tr><tr><td>a) average values and variability of flow, pH, temperature, and conductivity;</td><td>N/A</td></tr><tr><td>b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances / micropollutants);</td><td>N/A</td></tr><tr><td>c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);</td><td>N/A</td></tr></table> <p>Which of the following elements are included as part oif the inventory relating waste gas streams?</p> <p>(iii) information about the characteristics of the waste gas streams, such as:</p> <table><tr><th>Features</th><th>Yes/No</th></tr><tr><td>a) average values and variability of flow and temperature;</td><td>N/A</td></tr><tr><td>b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs);</td><td>N/A</td></tr><tr><td>c) flammability, lower and higher explosive limits, reactivity;</td><td>N/A</td></tr><tr><td>d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).</td><td>N/A</td></tr></table>	treatment at source including their performances;		Features	Yes/No	a) average values and variability of flow, pH, temperature, and conductivity;	N/A	b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances / micropollutants);	N/A	c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);	N/A	Features	Yes/No	a) average values and variability of flow and temperature;	N/A	b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs);	N/A	c) flammability, lower and higher explosive limits, reactivity;	N/A	d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).	N/A	<p>the requested information.</p> <p>Applicant is to clearly identify and label each discharge point to the sewer and the environment, clearly describing its source. This shall include the geo-reference coordinates in DD MM SS.SSS format of each trade effluent discharge point and the associated treatment methods.</p>	<p>where the material is collected. The water doesn't go anywhere.</p> <p>Otherwise as has already been stated before all the water collected from the clean areas is collected in a cistern and used for washing and toilets. Filtered water which would have passed through a sedimentation trap and separator goes into another cistern and is used for cooling the shredder and its engine and can also be used in case of a fire. Flushing waters and wash hand basin waters are collected in a cesspit since the site is not connected with as ewer. As such there is no water which can be classified waste water</p>	
treatment at source including their performances;																								
Features	Yes/No																							
a) average values and variability of flow, pH, temperature, and conductivity;	N/A																							
b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances / micropollutants);	N/A																							
c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);	N/A																							
Features	Yes/No																							
a) average values and variability of flow and temperature;	N/A																							
b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs);	N/A																							
c) flammability, lower and higher explosive limits, reactivity;	N/A																							
d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).	N/A																							

						except that which is collected in the cistern from toilets etc. Hence the assessment.			
BAT 4 In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques given below.				Kindly provide details on hoe each of the following techniques is being implemented on site.		Noted		See reply above in connection with Waste Management Plan.	
Technique		Description	Applicability		Technique				Yes/No
a.	Optimised storage location	This includes techniques such as: — the storage is located as far as technically and economically possible from sensitive receptors, watercourses, etc.;; — the storage is located in such a way so as to eliminate or minimise the unnecessary handling of wastes within the plant (e.g. the same wastes are handled twice or more or the transport distances on site are unnecessarily long).	Generally applicable to new plants.	a.	Optimized storage location				
				Yes					
b.	Adequate storage capacity	Measures are taken to avoid accumulation of waste, such as: — the maximum waste storage capacity is clearly established and not exceeded taking into account the characteristics of the wastes (e.g. regarding the risk of fire) and the treatment capacity; — the quantity of waste stored is regularly monitored against the maximum allowed storage capacity;	Generally applicable.	b.	Adequate storage capacity				
					Yes				
				c.	Safe storage operation				
					Yes				
				d.	Separate area for storage and handling of packaged hazardous waste				
				Yes					

		<ul style="list-style-type: none"> the maximum residence time of waste is clearly established. 					
c.	Safe storage operation	<p>This includes measures such as:</p> <ul style="list-style-type: none"> equipment used for loading, unloading and storing waste is clearly documented and labelled; wastes known to be sensitive to heat, light, air, water, etc. are protected from such ambient conditions; containers and drums are fit for purpose and stored securely. 					
d.	Separate area for storage and handling of packaged hazardous waste	When relevant, a dedicated area is used for storage and handling of packaged hazardous waste.					
BAT 5 In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures. Description Handling and transfer procedures aim to ensure that wastes are safely handled and transferred to the respective storage or treatment. They include the following elements: <ul style="list-style-type: none"> handling and transfer of waste are carried out by competent staff; handling and transfer of waste are duly documented, validated prior to execution and verified after execution; measures are taken to prevent, detect and mitigate spills; operation and design precautions are taken when mixing or blending wastes (e.g. vacuuming dusty/powdery wastes). Handling and transfer procedures are risk-based considering the likelihood of accidents and incidents and their environmental impact.				How will handling and transfer procedures be carried out ? Done and applicable only to a certain extent since no wastes are treated locally and so everything is either exported or sold to third parties.	Noted.	–	–
1.2 Monitoring							
BAT 6 For relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature,				Which process parameters will be monitored, and at which points?	Noted without prejudice to clarifications	See reply above	Noted.

conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pretreatment, at the inlet to the final treatment, at the point where the emission leaves the installation).					Parameters		Yes/No (If yes, at which points?)		requested in BAT No. 3 above.		
					Waste water flow		N/A				
					pH		N/A				
					Temperature		N/A				
					Conductivity		N/A				
					BOD		N/A				
BAT 7 BAT is to monitor emissions to water with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.					Kindly include the list of parameters together with the proposed moniroing standard as part of the monitoring proposal submitted in line with Section B3.10 of the application. <i>Should the operator, request any deviations from the requirements listed in BAT 7, adequate justificate with cross-reference to the applicable application document is to be provided for ERA’s consideration.</i>				Noted		-
Substance/parameter		Standard(s)	Waste treatment process	Minimum monitoring frequency ⁽¹¹⁾⁽¹²⁾	Monitoring associated with						
Adsorbable organically bound halogens (AOX) ⁽¹³⁾ ⁽¹⁴⁾		EN ISO 9562	Treatment of water-based liquid waste	Once every day	BAT 20						
Benzene, toluene, ethylbenzene, xylene (BTEX) ⁽¹³⁾ ⁽¹⁴⁾		EN ISO 15680	Treatment of water-based liquid waste	Once every month							
Chemical oxygen demand (COD) ⁽¹⁵⁾ ⁽¹⁶⁾		No EN standard available	All waste treatments except treatment of water-based liquid waste	Once every month							
			Treatment of water-based liquid waste	Once every day							
Free cyanide (CN ⁻) ⁽¹³⁾ ⁽¹⁴⁾		Various EN standards available (i.e. EN ISO 14403-1 and -2)	Treatment of water-based liquid waste	Once every day							

Hydrocarbon oil index (HOI) ⁽¹⁴⁾	EN ISO 9377-2	Mechanical treatment in shredders of metal waste	Once every month					
		Treatment of WEEE containing VFCs and/or VHCs						
		Re-refining of waste oil						
		Physico-chemical treatment of waste with calorific value						
		Water washing of excavated contaminated soil						
		Treatment of water-based liquid waste	Once every day					
Arsenic (As), Cadmium (Cd), Chromium (Cr), Copper (Cu), Nickel (Ni), Lead (Pb), Zinc (Zn) ⁽¹³⁾ ⁽¹⁴⁾	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)	Mechanical treatment in shredders of metal waste	Once every month					
		Treatment of WEEE containing VFCs and/or VHCs						

		Mechanical biological treatment of waste						
		Re-refining of waste oil						
		Physico-chemical treatment of waste with calorific value						
		Physico-chemical treatment of solid and/or pasty waste						
		Regeneration of spent solvents						
		Water washing of excavated contaminated soil						
		Treatment of water-based liquid waste	Once every day					
Manganese (Mn) ⁽¹³⁾ ⁽¹⁴⁾		Treatment of water-based liquid waste	Once every day					
Hexavalent chromium (Cr(VI)) ⁽¹³⁾ ⁽¹⁴⁾	Various EN standards available (i.e.	Treatment of water-based liquid waste	Once every day					

	EN ISO 10304-3, EN ISO 23913)								
Mercury (Hg) ^[13] ^[14]	Various EN standards available (i.e. EN ISO 17852, EN ISO 12846)	Mechanical treatment in shredders of metal waste	Once every month						
		Treatment of WEEE containing VFCs and/or VHCs							
		Mechanical biological treatment of waste							
		Re-refining of waste oil							
		Physico-chemical treatment of waste with calorific value							
		Physico-chemical treatment of solid and/or pasty waste							
		Regeneration of spent solvents							
		Water washing of excavated							

		contaminated soil							
		Treatment of water-based liquid waste	Once every day						
PFOA ⁽¹³⁾	No EN standard available	All waste treatments	Once every six months						
PFOS ⁽¹³⁾									
Phenol index ⁽¹⁶⁾	EN ISO 14402	Re-refining of waste oil	Once every month						
		Physico-chemical treatment of waste with calorific value							
		Treatment of water-based liquid waste	Once every day						
Total nitrogen (Total N) ⁽¹⁶⁾	EN 12260, EN ISO 11905-1	Biological treatment of waste	Once every month						
		Re-refining of waste oil							
		Treatment of water-based liquid waste	Once every day						
Total organic carbon (TOC) ⁽¹⁵⁾ ⁽¹⁶⁾	EN 1484	All waste treatments except treatment of water-based liquid waste	Once every month						

		Treatment of water-based liquid waste	Once every day					
Total phosphorus (Total P) ⁽¹⁶⁾	Various EN standards available (i.e. EN ISO 15681-1 and -2, EN ISO 6878, EN ISO 11885)	Biological treatment of waste	Once every month					
		Treatment of water-based liquid waste	Once every day					
Total suspended solids (TSS) ⁽¹⁶⁾	EN 872	All waste treatments except treatment of water-based liquid waste	Once every month					
		Treatment of water-based liquid waste	Once every day					

BAT 8 BAT is to monitor channelled emissions to air with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.					Kindly include the list of parameters together with the proposed moniroing standard as part of the monitoring proposal submitted in line with Section B3.10 of the application. <i>Should the operator, request any deviations from the requirements listed in BAT 7, adequate justificate with cross-reference to the applicable application document is to be provided for ERA’s consideration.</i> Dust emissions to air measured for a whole month during January 2019 showed that the operation of the shredder on site was not contributing to any additional dusts levels in the area. We request that Monitoring frequency should be limited to 1 every four years. Other parameters are not applicable.	Kindly clarify whether the data referred to here and associated monitoring covers channeled emissions to air from waste treatment activity (e.g. stack from the shredding/crushing chamber). This BAT conclusion does not cover emissions from combustion plants.	Please note that PM10 and TSP sampling has been taken as established in clause 2.1.1.5 of IPPC permit. Report has been submitted in January 2019. Stack monitoring as also carried out from shredder and mobile equipment and report submitted in 2018.	Based on the replies to BAT14 below, a monitoring proposal might need need to be submitted to consider relevant substances/parameters identified in this BAT.
Substance/Parameter	Standard(s)	Waste treatment process	Minimum monitoring frequency ⁽¹⁷⁾	Monitoring associated with				
Brominated flame retardants ⁽¹⁸⁾	No EN standard available	Mechanical treatment in shredders of metal waste	Once every year	BAT 25				
CFCs	No EN standard available	Treatment of WEEE containing	Once every six months	BAT 29				

		VFCs and/or VHCs							
Dioxin-like PCBs	EN 1948-1, -2, and -4 ⁽¹⁹⁾	Mechanical treatment in shredders of metal waste ⁽¹⁸⁾	Once every year	BAT 25					
		Decontamination of equipment containing PCBs	Once every three months	BAT 51					
Dust	EN 13284-1	Mechanical treatment of waste	Once every six months	BAT 25					
		Mechanical biological treatment of waste		BAT 34					
		Physico-chemical treatment of solid and/or pasty waste		BAT 41					
		Thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil		BAT 49					
		Water washing of excavated contaminated soil		BAT 50					
HCl	EN 1911	Thermal treatment of		BAT 49					

		spent activated carbon, waste catalysts and excavated contaminated soil ⁽¹⁸⁾	Once every six months					
		Treatment of water-based liquid waste ⁽¹⁸⁾		BAT 53				
HF	No EN standard available	Thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil ⁽¹⁸⁾	Once every six months	BAT 49				
Hg	EN 13211	Treatment of WEEE containing mercury	Once every three months	BAT 32				
H ₂ S	No EN standard available	Biological treatment of waste ⁽²⁰⁾	Once every six months	BAT 34				
Metals and metalloids except mercury (e.g. As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Tl, V) ⁽¹⁸⁾	EN 14385	Mechanical treatment in shredders of metal waste	Once every year	BAT 25				
NH ₃	No EN standard available	Biological treatment of waste ⁽²⁰⁾	Once every six months	BAT 34				
		Physico-chemical treatment of solid and/or pasty waste ⁽¹⁸⁾	Once every six months	BAT 41				

		Treatment of water-based liquid waste ⁽¹⁸⁾		BAT 53				
Odour concentration	EN 13725	Biological treatment of waste ⁽²¹⁾	Once every six months	BAT 34				
PCDD/F ⁽¹⁸⁾	EN 1948-1, -2 and -3 ⁽¹⁹⁾	Mechanical treatment in shredders of metal waste	Once every year	BAT 25				
TVOC	EN 12619	Mechanical treatment in shredders of metal waste	Once every six months	BAT 25				
		Treatment of WEEE containing VFCs and/or VHCs	Once every six months	BAT 29				
		Mechanical treatment of waste with calorific value ⁽¹⁸⁾	Once every six months	BAT 31				
		Mechanical biological treatment of waste	Once every six months	BAT 34				
		Physico-chemical treatment of solid and/or pasty waste ⁽¹⁸⁾	Once every six months	BAT 41				
		Re-refining of waste oil		BAT 44				

		Physico-chemical treatment of waste with calorific value		BAT 45				
		Regeneration of spent solvents		BAT 47				
		Thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil		BAT 49				
		Water washing of excavated contaminated soil		BAT 50				
		Treatment of water-based liquid waste ⁽¹⁸⁾		BAT 53				
		Decontamination of equipment containing PCBs ⁽²²⁾	Once every three months	BAT 51				
BAT 9 BAT is to monitor diffuse emissions of organic compounds to air from the regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value, at least once per year using one or a combination of the techniques given below.					Which techniques will be applied to monitor diffuse emissions of organic compounds from solvent regeneration?	Noted.		-
					Kindly also specify how diffuse emissions shall be monitored using the chosen technique. Kindly include the proposed moniroing technque as part of the monitoring proposal submitted in line with Section B3.10 of the application.			

<table><tr><td>b</td><td>Emissions factors</td><td>Calculation of emissions based on emissions factors, periodically validated (e.g. once every two years) by measurements.</td></tr><tr><td>c</td><td>Mass balance</td><td>Calculation of diffuse emissions using a mass balance considering the solvent input, channelled emissions to air, emissions to water, the solvent in the process output, and process (e.g. distillation) residues.</td></tr></table>			b	Emissions factors	Calculation of emissions based on emissions factors, periodically validated (e.g. once every two years) by measurements.	c	Mass balance	Calculation of diffuse emissions using a mass balance considering the solvent input, channelled emissions to air, emissions to water, the solvent in the process output, and process (e.g. distillation) residues.	N/A					
b	Emissions factors	Calculation of emissions based on emissions factors, periodically validated (e.g. once every two years) by measurements.												
c	Mass balance	Calculation of diffuse emissions using a mass balance considering the solvent input, channelled emissions to air, emissions to water, the solvent in the process output, and process (e.g. distillation) residues.												
<p>BAT 10</p> <p>BAT is to periodically monitor odour emissions.</p> <p>Description</p> <p>Odour emissions can be monitored using:</p> <ul style="list-style-type: none">– EN standards (e.g. dynamic olfactometry according to EN 13725 in order to determine the odour concentration or EN 16841-1 or -2 in order to determine the odour exposure);– when applying alternative methods for which no EN standards are available (e.g. estimation of odour impact), ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality. <p>The monitoring frequency is determined in the odour management plan (see BAT 12).</p> <p>Applicability</p> <p>The applicability is restricted to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.</p>			<p>Which methods or features will be applied for frequent monitoring of odour emissions?</p> <p>Kindly also specify how odour emissions shall be monitored using the chosen technique. Kindly include the he proposed moniroing technque as part of the monitoring proposal submitted in line with Section B3.10 of the application.</p> <table><tr><th>Features/Methods</th><th>Yes/No</th></tr><tr><td>1) EN standards (e.g. dynamic olfactometry according to EN 13725 to determine the odour concentration or EN 16841-1 or -2 in order to determine odour exposure)</td><td>N/A</td></tr><tr><td>2) Alternative methods for which no EN standards are available</td><td>N/A</td></tr><tr><td>3) ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality</td><td>N/A</td></tr></table>	Features/Methods	Yes/No	1) EN standards (e.g. dynamic olfactometry according to EN 13725 to determine the odour concentration or EN 16841-1 or -2 in order to determine odour exposure)	N/A	2) Alternative methods for which no EN standards are available	N/A	3) ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality	N/A	Noted.		-
Features/Methods	Yes/No													
1) EN standards (e.g. dynamic olfactometry according to EN 13725 to determine the odour concentration or EN 16841-1 or -2 in order to determine odour exposure)	N/A													
2) Alternative methods for which no EN standards are available	N/A													
3) ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality	N/A													
<p>BAT 11</p> <p>BAT is to monitor the annual consumption of water, energy and raw materials as well as the annual generation of residues and waste water, with a frequency of at least once per year.</p> <p>Description</p> <p>Monitoring includes direct measurements, calculation or recording, e.g. using suitable meters or invoices. The monitoring is broken down at the most appropriate level (e.g. at process or plant/installation level) and considers any significant changes in the plant/installation.</p>			<p>How will the monitoring of the annual consumption of water, energy and raw materials, as well as the annual generation of residues and wastewater, be carried out?</p> <p>Standard methods i.e water and electricity bills</p>	Noted.		-								
1.3 Emissions to air														

<p>BAT 12</p> <p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none">• a protocol containing actions and timelines;• a protocol for conducting odour monitoring as set out in BAT 10;• a protocol for response to identified odour incidents, e.g. complaints;• an odour prevention and reduction programme designed to identify the source(s); to characterise the contributions of the sources; and to implement prevention and/or reduction measures. <p>Applicability</p> <p>The applicability is restricted to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.</p>	<p>Kindly specify which of the following elements are included or proposed to be included as part of the odour management plan. Should any of these elements not be currently included in such plan, kindly provide a timeframe by when these elements will be included.</p> <table><thead><tr><th>Elements</th><th>Yes/No</th></tr></thead><tbody><tr><td>1) A protocol containing actions and timelines</td><td></td></tr><tr><td>2) A protocol conducting odour monitoring as set out in BAT 10</td><td></td></tr><tr><td>3) A protocol for response to identified odour incidents, e.g. complaints</td><td></td></tr><tr><td>4) An odour prevention and reduction programme designed to identify the source(s); to characterize the contributions of the sources; and to implement prevention and/or reduction measures</td><td></td></tr></tbody></table> <p>N/A</p>	Elements	Yes/No	1) A protocol containing actions and timelines		2) A protocol conducting odour monitoring as set out in BAT 10		3) A protocol for response to identified odour incidents, e.g. complaints		4) An odour prevention and reduction programme designed to identify the source(s); to characterize the contributions of the sources; and to implement prevention and/or reduction measures		Noted.		-						
Elements	Yes/No																			
1) A protocol containing actions and timelines																				
2) A protocol conducting odour monitoring as set out in BAT 10																				
3) A protocol for response to identified odour incidents, e.g. complaints																				
4) An odour prevention and reduction programme designed to identify the source(s); to characterize the contributions of the sources; and to implement prevention and/or reduction measures																				
<p>BAT 13</p> <p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques given below.</p> <table><thead><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr></thead><tbody><tr><td>a.</td><td>Minimising residence times</td><td>Minimising the residence time of (potentially) odorous waste in storage or in handling systems (e.g.</td><td>Only applicable to open systems.</td></tr></tbody></table>	Technique		Description	Applicability	a.	Minimising residence times	Minimising the residence time of (potentially) odorous waste in storage or in handling systems (e.g.	Only applicable to open systems.	<p>Kindly specify which odour minisatation technique shall be implemented on site and provide details of the chosen technique:</p> <table><thead><tr><th>Technique</th><th>Yes/No</th></tr></thead><tbody><tr><td>1) Minimizing residence times</td><td></td></tr><tr><td>2) Using chemical treatment</td><td></td></tr><tr><td>3) Optimizing aerobic treatment</td><td></td></tr></tbody></table> <p>N/A</p>	Technique	Yes/No	1) Minimizing residence times		2) Using chemical treatment		3) Optimizing aerobic treatment		Noted.		-
Technique		Description	Applicability																	
a.	Minimising residence times	Minimising the residence time of (potentially) odorous waste in storage or in handling systems (e.g.	Only applicable to open systems.																	
Technique	Yes/No																			
1) Minimizing residence times																				
2) Using chemical treatment																				
3) Optimizing aerobic treatment																				

		<p>—frequent maintenance of the aeration system.</p> <p>In the case of aerobic treatment of waste other than water-based liquid waste, see BAT 36.</p>							
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BAT 14 In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques given below. Depending on the risk posed by the waste in terms of diffuse emissions to air, BAT 14d is especially relevant.				Which techniques will be used in order to reduce diffuse emissions to air, in particular dust, organic compounds and odour?		ERA is not agreement that BAT 14 is not applicable to the site in question, particularly BAT 14d. Please provide reply.	Cannot see where this is applicable. Maybe ERA can be a little more clear in their reply.	The shredder activity is particulatly pertinent to 14d. Kindly provide the requested information.	None of the items mentioned under 14d are used on site
Technique		Description		Applicability					
Technique		Description		Applicability					
a.	Minimising the number of potential diffuse emission sources	This includes techniques such as: — appropriate design of piping layout (e.g. minimising pipe run length, reducing the number of flanges and valves, using welded fittings and pipes); — favouring the use of gravity transfer rather than using pumps; — limiting the drop height of material; — limiting traffic speed; — using wind barriers.	Generally applicable.						
b.	Selection and use of high-integrity equipment	This includes techniques such as: — valves with double packing seals or equally efficient equipment; — high-integrity gaskets (such as spiral wound, ring joints) for critical applications; — pumps/compressors/agitators fitted with mechanical seals instead of packing; — magnetically driven pumps/compressors/agitators;	Applicability may be restricted in the case of existing plants due to operability requirements.						

g.	Cleaning of waste treatment and storage areas	This includes techniques such as regularly cleaning the whole waste treatment area (halls, traffic areas, storage areas, etc.), conveyor belts, equipment and containers.	Generally applicable.																							
h.	Leak detection and repair (LDAR) programme	See Section 6.2. When emissions of organic compounds are expected, a LDAR programme is set up and implemented using a risk-based approach, considering in particular the design of the plant and the amount and nature of the organic compounds concerned.	Generally applicable.																							
BAT 15 BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques given below.				Kidnly specify which of the following techniques shall be utilised to ensure safe use of flares, and details of how this will be monitored? Kindly provide details of the montiroing, which will be carried out during such flaring.	Non-applicability noted																					
<table><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Correct plant design</td><td>This includes the provision of a gas recovery system with sufficient capacity and the use of high-integrity relief valves.</td><td>Generally applicable to new plants. A gas recovery system may be retrofitted in existing plants.</td></tr><tr><td>b.</td><td>Plant management</td><td>This includes balancing the gas system and using advanced process control.</td><td>Generally applicable.</td></tr></table>				Technique		Description	Applicability	a.	Correct plant design	This includes the provision of a gas recovery system with sufficient capacity and the use of high-integrity relief valves.	Generally applicable to new plants. A gas recovery system may be retrofitted in existing plants.	b.	Plant management	This includes balancing the gas system and using advanced process control.	Generally applicable.	<table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>a) Correct plant design</td><td></td></tr><tr><td>b) Plant management</td><td></td></tr></table> N/A	Technique	Yes/No	a) Correct plant design		b) Plant management					
Technique		Description	Applicability																							
a.	Correct plant design	This includes the provision of a gas recovery system with sufficient capacity and the use of high-integrity relief valves.	Generally applicable to new plants. A gas recovery system may be retrofitted in existing plants.																							
b.	Plant management	This includes balancing the gas system and using advanced process control.	Generally applicable.																							
Technique	Yes/No																									
a) Correct plant design																										
b) Plant management																										
BAT 16 In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use both of the techniques given below.				How will flaring emissions be reduced? Which techniques will be applied in order to do so?	Non-applicability noted																					
<table><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Correct design of flaring devices</td><td>Optimisation of height and pressure, assistance by steam, air or gas, type of flare tips, etc., to enable smokeless and reliable operation and to ensure the efficient combustion of excess gases.</td><td>Generally applicable to new flares. In existing plants, applicability may be restricted, e.g. due to maintenance time availability.</td></tr></table>				Technique		Description	Applicability	a.	Correct design of flaring devices	Optimisation of height and pressure, assistance by steam, air or gas, type of flare tips, etc., to enable smokeless and reliable operation and to ensure the efficient combustion of excess gases.	Generally applicable to new flares. In existing plants, applicability may be restricted, e.g. due to maintenance time availability.	<table><tr><th>Techniques</th><th>Yes/No</th></tr><tr><td>a) Correct design of flaring devices</td><td></td></tr><tr><td>b) Monitoring and recording as part of flare management</td><td></td></tr></table> N/A	Techniques	Yes/No	a) Correct design of flaring devices		b) Monitoring and recording as part of flare management									
Technique		Description	Applicability																							
a.	Correct design of flaring devices	Optimisation of height and pressure, assistance by steam, air or gas, type of flare tips, etc., to enable smokeless and reliable operation and to ensure the efficient combustion of excess gases.	Generally applicable to new flares. In existing plants, applicability may be restricted, e.g. due to maintenance time availability.																							
Techniques	Yes/No																									
a) Correct design of flaring devices																										
b) Monitoring and recording as part of flare management																										

b.	Monitoring and recording as part of flare management	This includes continuous monitoring of the quantity of gas sent to flaring. It may include estimations of other parameters (e.g. composition of gas flow, heat content, ratio of assistance, velocity, purge gas flow rate, pollutant emissions (e.g. NO _x , CO, hydrocarbons), noise). The recording of flaring events usually includes the duration and number of events and allows for the quantification of emissions and the potential prevention of future flaring events.	Generally applicable.						
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1.4. Noise and vibrations																													
BAT 17 In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to set up, implement and regularly review a noise and vibration management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements: I. a protocol containing appropriate actions and timelines; II. a protocol for conducting noise and vibration monitoring; III. a protocol for response to identified noise and vibration events, e.g. complaints; IV. a noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures. Applicability The applicability is restricted to cases where a noise or vibration nuisance at sensitive receptors is expected and/or has been substantiated.				How will noise and vibration emissions be mitigated? Will a noise and vibration management plan be implemented? If yes, which features will be included?		It is to be noted IP0004/12/B caters already for complaints, which also include noise complaints. Non-applicability is not deemed as acceptable and therefore a protocol needs to be submitted as part of a consolidated noise management plan referred to in BAT no. 1.			Which following issues?	Kindly ensure noise mangement addresses the following issues.																			
				<table><tr><th>Feature</th><th>Yes/No</th></tr><tr><td>a) A protocol containing appropriate actions and timelines</td><td>Yes</td></tr><tr><td>b) A protocol for conducting noise and vibration monitoring</td><td>Yes</td></tr><tr><td>c) A protocol for response to identified noise and vibration events, e.g. complaints</td><td>Yes</td></tr><tr><td>d) A noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterize the contributions of the sources and to implement prevention and/or reduction measures</td><td>Yes</td></tr></table>							Feature	Yes/No	a) A protocol containing appropriate actions and timelines	Yes	b) A protocol for conducting noise and vibration monitoring	Yes	c) A protocol for response to identified noise and vibration events, e.g. complaints	Yes	d) A noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterize the contributions of the sources and to implement prevention and/or reduction measures	Yes									
Feature	Yes/No																												
a) A protocol containing appropriate actions and timelines	Yes																												
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c) A protocol for response to identified noise and vibration events, e.g. complaints	Yes																												
d) A noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterize the contributions of the sources and to implement prevention and/or reduction measures	Yes																												
BAT 18 In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques given below.				Kindly specify which of the following techniques shall be implemented to reduce emissions from noise and vibration. Details of the chosen technique are to be submitted.		Noted.																							
<table><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Appropriate location of equipment and buildings</td><td>Noise levels can be reduced by increasing the distance between the emitter and the receiver, by using buildings as noise screens and by relocating building exits or entrances.</td><td>For existing plants, the relocation of equipment and building exits or entrances may be restricted by a lack of space or excessive costs.</td></tr><tr><td>b.</td><td>Operational measures</td><td>This includes techniques such as: (i) inspection and maintenance of equipment;</td><td>Generally applicable.</td></tr></table>				Technique							Description	Applicability	a.	Appropriate location of equipment and buildings	Noise levels can be reduced by increasing the distance between the emitter and the receiver, by using buildings as noise screens and by relocating building exits or entrances.	For existing plants, the relocation of equipment and building exits or entrances may be restricted by a lack of space or excessive costs.	b.	Operational measures	This includes techniques such as: (i) inspection and maintenance of equipment;	Generally applicable.	<table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>1) Appropriate location of equipment and buildings</td><td>No</td></tr><tr><td>2) Operational measures</td><td>No</td></tr><tr><td>3) Low-noise equipment</td><td>No</td></tr><tr><td>4) Noise and vibration control equipment</td><td>Yes</td></tr><tr><td>5) Noise attenuation</td><td>Yes</td></tr></table>		Technique	Yes/No	1) Appropriate location of equipment and buildings	No	2) Operational measures	No	3) Low-noise equipment
Technique		Description	Applicability																										
a.	Appropriate location of equipment and buildings	Noise levels can be reduced by increasing the distance between the emitter and the receiver, by using buildings as noise screens and by relocating building exits or entrances.	For existing plants, the relocation of equipment and building exits or entrances may be restricted by a lack of space or excessive costs.																										
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Technique	Yes/No																												
1) Appropriate location of equipment and buildings	No																												
2) Operational measures	No																												
3) Low-noise equipment	No																												
4) Noise and vibration control equipment	Yes																												
5) Noise attenuation	Yes																												

		(ii) closing of doors and windows of enclosed areas, if possible; (iii) equipment operation by experienced staff; (iv) avoidance of noisy activities at night, if possible; (v) provisions for noise control during maintenance, traffic, handling and treatment activities.								
c.	Low-noise equipment	This may include direct drive motors, compressors, pumps and flares.								
d.	Noise and vibration control equipment	This includes techniques such as: (i) noise reducers; (ii) acoustic and vibrational insulation of equipment; (iii) enclosure of noisy equipment; (iv) soundproofing of buildings.	Applicability may be restricted by a lack of space (for existing plants).							
e.	Noise attenuation	Noise propagation can be reduced by inserting obstacles between emitters and receivers (e.g. protection walls, embankments and buildings).	Applicable only to existing plants, as the design of new plants should make this technique unnecessary. For existing plants, the insertion of obstacles may be restricted by a lack of space. For mechanical treatment in shredders of metal wastes, it is applicable within the constraints associated with the							

				risk of deflagration in shredders.						
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1.5. Emissions to water																													
BAT 19 In order to optimise water consumption, to reduce the volume of wastewater generated and to prevent or, where that is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques given below.					<div>How will wastewater volume be reduced? Moreover, which techniques will be applied to reduce emissions to soil and water? Kindly provide details of the relevant technique.</div> <table><thead><tr><th>Technique</th><th>Yes/No</th></tr></thead><tbody><tr><td>a) Water management</td><td>Yes</td></tr><tr><td>b) Water recirculation</td><td>Yes</td></tr><tr><td>c) Impermeable surface</td><td>Yes</td></tr><tr><td>d) Techniques to reduce the likelihood and impact of overflows and failures from tanks and vessels</td><td>No</td></tr><tr><td>e) Roofing of waste storage and treatment areas</td><td>Yes</td></tr><tr><td>f) Segregation of water streams</td><td>Yes</td></tr><tr><td>g) Adequate drainage infrastructure</td><td>Yes</td></tr><tr><td>h) Design and maintenance provisions to allow detection and repair of leaks</td><td>No</td></tr><tr><td>i) Appropriate buffer storage capacity</td><td>No</td></tr></tbody></table>		Technique	Yes/No	a) Water management	Yes	b) Water recirculation	Yes	c) Impermeable surface	Yes	d) Techniques to reduce the likelihood and impact of overflows and failures from tanks and vessels	No	e) Roofing of waste storage and treatment areas	Yes	f) Segregation of water streams	Yes	g) Adequate drainage infrastructure	Yes	h) Design and maintenance provisions to allow detection and repair of leaks	No	i) Appropriate buffer storage capacity	No	Noted.		
Technique	Yes/No																												
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b) Water recirculation	Yes																												
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f) Segregation of water streams	Yes																												
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h) Design and maintenance provisions to allow detection and repair of leaks	No																												
i) Appropriate buffer storage capacity	No																												
Technique		Description	Applicability																										
a.	Water management	Water consumption is optimised by using measures which may include: <ul style="list-style-type: none">— water-saving plans (e.g. establishment of water efficiency objectives, flow diagrams and water mass balances);— optimising the use of washing water (e.g. dry cleaning instead of hosing down, using trigger control on all washing equipment);— reducing the use of water for vacuum generation (e.g. use of liquid ring pumps with high boiling point liquids).	Generally applicable.																										
b.	Water recirculation	Water streams are recirculated within the plant, if necessary after treatment. The degree of recirculation is limited by the water balance of the plant, the content of impurities (e.g. odorous compounds) and/or the characteristics of the water streams (e.g. nutrient content).	Generally applicable.																										
c.	Impermeable surface	Depending on the risks posed by the waste in terms of soil and/or water contamination, the surface of the whole waste treatment area (e.g. waste reception, handling, storage, treatment and dispatch areas) is made impermeable to the liquids concerned.	Generally applicable.																										
d.	Techniques to reduce the likelihood and impact of overflows and failures from tanks and vessels	Depending on the risks posed by the liquids contained in tanks and vessels in terms of soil and/or water contamination, this includes techniques such as: <ul style="list-style-type: none">— overflow detectors;— overflow pipes that are directed to a contained drainage system (i.e. the relevant secondary containment or another vessel);— tanks for liquids that are located in a suitable secondary containment; the volume is normally sized to accommodate the	Generally applicable.																										

		<p>loss of containment of the largest tank within the secondary containment;</p> <p>— isolation of tanks, vessels and secondary containment (e.g. closing of valves).</p>					
e.	Roofing of waste storage and treatment areas	Depending on the risks posed by the waste in terms of soil and/or water contamination, waste is stored and treated in covered areas to prevent contact with rainwater and thus minimise the volume of contaminated run-off water.	Applicability may be constrained when high volumes of waste are stored or treated (e.g. mechanical treatment in shredders of metal waste).				
f.	Segregation of water streams	Each water stream (e.g. surface run-off water, process water) is collected and treated separately, based on the pollutant content and on the combination of treatment techniques. In particular, uncontaminated waste water streams are segregated from waste water streams that require treatment.	<p>Generally applicable to new plants.</p> <p>Generally applicable to existing plants within the constraints associated with the layout of the water collection system.</p>				
g.	Adequate drainage infrastructure	The waste treatment area is connected to drainage infrastructure. Rainwater falling on the treatment and storage areas is collected in the drainage infrastructure along with washing water, occasional spillages, etc. and, depending on the pollutant content, recirculated or sent for further treatment.	<p>Generally applicable to new plants.</p> <p>Generally applicable to existing plants within the constraints associated with the layout of the water drainage system.</p>				
h.	Design and maintenance provisions to allow detection and repair of leaks	<p>Regular monitoring for potential leakages is risk-based, and, when necessary, equipment is repaired.</p> <p>The use of underground components is minimised. When underground components are used, and depending on the risks posed by the waste contained in those components in terms of soil and/or water contamination, secondary containment of underground components is put in place.</p>	<p>The use of above-ground components is generally applicable to new plants. It may be limited however by the risk of freezing.</p> <p>The installation of secondary containment may be limited in the case of existing plants.</p>				

i.	Appropriate buffer storage capacity	Appropriate buffer storage capacity is provided for waste water generated during other than normal operating conditions using a risk-based approach (e.g. taking into account the nature of the pollutants, the effects of downstream waste water treatment, and the receiving environment). The discharge of waste water from this buffer storage is only possible after appropriate measures are taken (e.g. monitor, treat, reuse).	Generally applicable to new plants. For existing plants, applicability may be limited by space availability and by the layout of the water collection system.																													
BAT 20 In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques given below.				How will the treatment procedure for wastewater be undertaken? Which techniques will be applied? <i>Operator is to also provide justification as to the proposed abatement technique of choice. Moreover, the operator is to also indicated the expected emission limits depending on the proposed technique(s).</i>	Applicant is to indicate which wastewater pollutants identified in BAT 3 shall be treated with the selected techniques.	See reply to BAT 3	Noted.																									
<table><tr><th colspan="2">Technique ^[23]</th><th>Typical pollutants targeted</th><th>Applicability</th></tr><tr><td colspan="4"><i>Preliminary and primary treatment, e.g.</i></td></tr><tr><td>a.</td><td>Equalisation</td><td>All pollutants</td><td rowspan="3">Generally applicable.</td></tr><tr><td>b.</td><td>Neutralisation</td><td>Acids, alkalis</td></tr><tr><td>c.</td><td>Physical separation, e.g. screens, sieves, grit separators, grease separators, oil-water separation or primary settlement tanks</td><td>Gross solids, suspended solids, oil/grease</td></tr><tr><td colspan="4"><i>Physico-chemical treatment, e.g.</i></td></tr><tr><td>d.</td><td>Adsorption</td><td>Adsorbable dissolved non-biodegradable or inhibitory pollutants, e.g. hydrocarbons, mercury, AOX</td><td rowspan="2">Generally applicable.</td></tr><tr><td>e.</td><td>Distillation/rectification</td><td>Dissolved non-biodegradable or inhibitory pollutants that can be distilled, e.g. some solvents</td></tr></table>								Technique ^[23]		Typical pollutants targeted	Applicability	<i>Preliminary and primary treatment, e.g.</i>				a.	Equalisation	All pollutants	Generally applicable.	b.	Neutralisation	Acids, alkalis	c.	Physical separation, e.g. screens, sieves, grit separators, grease separators, oil-water separation or primary settlement tanks	Gross solids, suspended solids, oil/grease	<i>Physico-chemical treatment, e.g.</i>				d.	Adsorption	Adsorbable dissolved non-biodegradable or inhibitory pollutants, e.g. hydrocarbons, mercury, AOX
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e.	Distillation/rectification	Dissolved non-biodegradable or inhibitory pollutants that can be distilled, e.g. some solvents																														

			chloride concentration prior to nitrification would not be justified by the environmental benefits. Nitrification is not applicable when the temperature of the waste water is low (e.g. below 12 °C).				
Solids removal, e.g.							
o.	Coagulation and flocculation	Suspended solids and particulate-bound metals	Generally applicable.				
p.	Sedimentation						
q.	Filtration (e.g. sand filtration, microfiltration, ultrafiltration)						
r.	Flotation						

Table 6.1: BAT-associated emission levels (BAT-AELs) for direct discharges to a receiving water body

Substance/Parameter	BAT-AEL ^[24]	Waste treatment process to which the BAT-AEL applies
Total organic carbon (TOC) ^[25]	10-60 mg/l	— All waste treatments except treatment of water-based liquid waste
	10-100 mg/l ^[26] ^[27]	— Treatment of water-based liquid waste
Chemical oxygen demand (COD) ^[25]	30-180 mg/l	— All waste treatments except treatment of water-based liquid waste
	30-300 mg/l ^[26] ^[27]	— Treatment of water-based liquid waste
Total suspended solids (TSS)	5-60 mg/l	— All waste treatments
Hydrocarbon oil index (HOI)	0,5-10 mg/l	— Mechanical treatment in shredders of metal waste
		— Treatment of WEEE containing VFCs and/or VHCs

			<ul style="list-style-type: none"> — Re-refining of waste oil — Physico-chemical treatment of waste with calorific value — Water washing of excavated contaminated soil — Treatment of water-based liquid waste 				
Total nitrogen (Total N)		1-25 mg/l ⁽²⁸⁾ ⁽²⁹⁾	<ul style="list-style-type: none"> — Biological treatment of waste — Re-refining of waste oil 				
		10-60 mg/l ⁽²⁸⁾ ⁽²⁹⁾ ⁽³⁰⁾	<ul style="list-style-type: none"> — Treatment of water-based liquid waste 				
Total phosphorus (Total P)		0,3-2 mg/l	<ul style="list-style-type: none"> — Biological treatment of waste 				
		1-3 mg/l ⁽²⁷⁾	<ul style="list-style-type: none"> — Treatment of water-based liquid waste 				
Phenol index		0,05-0,2 mg/l	<ul style="list-style-type: none"> — Re-refining of waste oil — Physico-chemical treatment of waste with calorific value 				
		0,05-0,3 mg/l	<ul style="list-style-type: none"> — Treatment of water-based liquid waste 				
Free cyanide (CN ⁻) ⁽³¹⁾		0,02-0,1 mg/l	<ul style="list-style-type: none"> — Treatment of water-based liquid waste 				
Adsorbable organically bound halogens (AOX) ⁽³¹⁾		0,2-1 mg/l	<ul style="list-style-type: none"> — Treatment of water-based liquid waste 				
Metals and metalloids ⁽³¹⁾	Arsenic (expressed as As)	0,01-0,05 mg/l	<ul style="list-style-type: none"> — Mechanical treatment in shredders of metal waste 				

	Cadmium (expressed as Cd)	0,01-0,05 mg/l	— Treatment of WEEE containing VFCs and/or VHCs — Mechanical biological treatment of waste — Re-refining of waste oil — Physico-chemical treatment of waste with calorific value — Physico-chemical treatment of solid and/or pasty waste — Regeneration of spent solvents — Water washing of excavated contaminated soil						
	Chromium (expressed as Cr)	0,01-0,15 mg/l							
	Copper (expressed as Cu)	0,05-0,5 mg/l							
	Lead (expressed as Pb)	0,05-0,1 mg/l ⁽³²⁾							
	Nickel (expressed as Ni)	0,05-0,5 mg/l							
	Mercury (expressed as Hg)	0,5-5 µg/l							
	Zinc (expressed as Zn)	0,1-1 mg/l ⁽³³⁾							
	Arsenic (expressed as As)	0,01-0,1 mg/l	— Treatment of water-based liquid waste						
	Cadmium (expressed as Cd)	0,01-0,1 mg/l							
	Chromium (expressed as Cr)	0,01-0,3 mg/l							

	Hexavalent chromium (expressed as Cr(VI))	0,01-0,1 mg/l							
	Copper (expressed as Cu)	0,05-0,5 mg/l							
	Lead (expressed as Pb)	0,05-0,3 mg/l							
	Nickel (expressed as Ni)	0,05-1 mg/l							
	Mercury (expressed as Hg)	1-10 µg/l							
	Zinc (expressed as Zn)	0,1-2 mg/l							

The associated monitoring is given in BAT 7.

Table 6.2 : BAT-associated emission levels (BAT-AELs) for indirect discharges to a receiving water body

Substance/Parameter	BAT-AEL ⁽³⁴⁾ ⁽³⁵⁾	Waste treatment process to which the BAT-AEL applies
Hydrocarbon oil index (HOI)	0,5-10 mg/l	— Mechanical treatment in shredders of metal waste
		— Treatment of WEEE containing VFCs and/or VHCs
		— Re-refining of waste oil

		<ul style="list-style-type: none"> — Physico-chemical treatment of waste with calorific value — Water washing of excavated contaminated soil — Treatment of water-based liquid waste 				
Free cyanide (CN ⁻) ⁽³⁶⁾		0,02-0,1 mg/l	— Treatment of water-based liquid waste			
Adsorbable organically bound halogens (AOX) ⁽³⁶⁾		0,2-1 mg/l	— Treatment of water-based liquid waste			
Metals and metalloids ⁽³⁶⁾	Arsenic (expressed as As)	0,01-0,05 mg/l	— Mechanical treatment in shredders of metal waste			
	Cadmium (expressed as Cd)	0,01-0,05 mg/l				
	Chromium (expressed as Cr)	0,01-0,15 mg/l	— Treatment of WEEE containing VFCs and/or VHCs			
	Copper (expressed as Cu)	0,05-0,5 mg/l	— Mechanical biological treatment of waste			
	Lead (expressed as Pb)	0,05-0,1 mg/l ⁽³⁷⁾	— Re-refining of waste oil			
	Nickel (expressed as Ni)	0,05-0,5 mg/l	— Physico-chemical treatment of waste with calorific value			
	Mercury (expressed as Hg)	0,5-5 µg/l				
	Zinc (expressed as Zn)	0,1-1 mg/l ⁽³⁸⁾	<ul style="list-style-type: none"> — Physico-chemical treatment of solid and/or pasty waste — Regeneration of spent solvents 			

			— Water washing of excavated contaminated soil				
	Arsenic (expressed as As)	0,01-0,1 mg/l	— Treatment of water-based liquid waste				
	Cadmium (expressed as Cd)	0,01-0,1 mg/l					
	Chromium (expressed as Cr)	0,01-0,3 mg/l					
	Hexavalent chromium (expressed as Cr(VI))	0,01-0,1 mg/l					
	Copper (expressed as Cu)	0,05-0,5 mg/l					
	Lead (expressed as Pb)	0,05-0,3 mg/l					
	Nickel (expressed as Ni)	0,05-1 mg/l					
	Mercury (expressed as Hg)	1-10 µg/l					
	Zinc (expressed as Zn)	0,1-2 mg/l					
The associated monitoring is given in BAT 7.							

1.6 Emissions from accidents and incidents								
BAT 21 In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques given below, as part of the accident management plan (see BAT 1).					Kindly specify how each of the following techniques shall be implemented to prevent or limit the environmental consequences of accidents and incidents.		noted	

1.7. Material efficiency							
BAT 22 In order to use materials efficiently, BAT is to substitute materials with waste. Description Waste is used instead of other materials for the treatment of wastes (e.g. waste alkalis or waste acids are used for pH adjustment, fly ashes are used as binders). Applicability Some applicability limitations derive from the risk of contamination posed by the presence of impurities (e.g. heavy metals, POPs, salts, pathogens) in the waste that substitutes other materials. Another limitation is the compatibility of the waste substituting other materials with the waste input (see BAT 2).			How will the substitution of materials with waste be carried out? Where will it apply? Not Applicable		Noted.		
1.8 Energy efficiency							
BAT 23 In order to use energy efficiently, BAT is to use both of the techniques given below.			Kindly specify how each of the following techniques shall be implemented on site.		The principles of energy efficiency are also applicable to this installation. Non-applicability reply not deemed as adequate .		Kindly provide reply Update energy efficiency plan: Noted [I don't believe installation of PV panels should be an IP item]
Technique		Description	Technique				
a.	Energy efficiency plan	An energy efficiency plan entails defining and calculating the specific energy consumption of the activity (or activities), setting key performance indicators on an annual basis (for example, specific energy consumption expressed in kWh/tonne of waste processed) and planning periodic improvement targets and related actions. The plan is adapted to the specificities of the waste treatment in terms of process(es) carried out, waste stream(s) treated, etc.	a) Energy efficiency plan Not Applicable				
b.	Energy balance record	An energy balance record provides a breakdown of the energy consumption and generation (including exportation) by the type of source (i.e. electricity, gas, conventional liquid fuels, conventional solid fuels, and waste). This includes: (i)information on energy consumption in terms of delivered energy;	b) Energy balance record Not Applicable				

		<p>(ii)information on energy exported from the installation;</p> <p>(iii)energy flow information (e.g. Sankey diagrams or energy balances) showing how the energy is used throughout the process.</p> <p>The energy balance record is adapted to the specificities of the waste treatment in terms of process(es) carried out, waste stream(s) treated, etc.</p>				
1.9 Reuse of packaging						
<p>BAT 24 In order to reduce the quantity of waste sent for disposal, BAT is to maximise the reuse of packaging, as part of the residues management plan (see BAT 1).</p> <p>Description Packaging (drums, containers, IBCs, pallets, etc.) is reused for containing waste, when it is in good condition and sufficiently clean, depending on a compatibility check between the substances contained (in consecutive uses). If necessary, packaging is sent for appropriate treatment prior to reuse (e.g. reconditioning, cleaning).</p> <p>Applicability Some applicability restrictions derive from the risk of contamination of the waste posed by the reused packaging.</p>			<p>Kindly specify how will the re-use of waste packaging shall be maximised to reduce the amount og waste sent for disposal. Kindly provide a copy of the residues management plan?</p> <p>The main packaging material which arrives on site is mainly metal drums. Some of these are used to fill with small metal parts prior to export. Once filled tehse are sealed and exported in that manner. This packaging and reusing method spares a lot of small bits of metal ending up on the quay during export and saves cleaning of the quay and collecting small bits and piece of metals which are not collected by the grabber when transferring material from the quay to the ship. This helps also in a more efficient transfer from the ship to quay at the receiving end.</p>	Noted.		

<p>2. BAT conclusions for the mechanical treatment of waste</p> <p>Unless otherwise stated, the BAT conclusions presented in Section 2 apply to the mechanical treatment of waste when it is not combined with biological treatment, and in addition to the general BAT conclusions in Section 1.</p>			
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<p>Unless otherwise stated, the BAT conclusions presented in Section 2 apply to the mechanical treatment of waste when it is not combined with biological treatment, and in addition to the general BAT conclusions in Section 1.</p>			
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2.1 General BAT conclusions for the mechanical treatment of waste			
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2.1.1 Emissions to air			
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<p>BAT 25</p> <p>In order to reduce emissions to air of dust, and of particulate-bound metals, PCDD/F and dioxin-like PCBs, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.</p>

In order to reduce emissions to air of dust, and of particulate-bound metals, PCDD/F and dioxin-like PCBs, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.

Kindly specify which of the following technique(s) shall be used in order to reduce emissions to air of the specified parameters. Further details of the relevant techniques are to be provided in the relevant section of the application.

Technique		Description	Applicability
a.	Cyclone	See Section 6.1. Cyclones are mainly used as preliminary separators for coarse dust.	Generally applicable.
b.	Fabric filter	See Section 6.1.	May not be applicable to exhaust air ducts directly connected to the shredder when the effects of deflagration on the fabric filter cannot be mitigated (e.g. by using pressure relief valves).
c.	Wet scrubbing	See Section 6.1.	Generally applicable.
d.	Water injection into the shredder	The waste to be shredded is damped by injecting water into the shredder. The amount of water injected is regulated in relation to the amount of waste being shredded (which may be monitored via the energy consumed by the shredder motor). The waste gas that contains residual dust is directed to cyclone(s) and/or a wet scrubber.	Only applicable within the constraints associated with local conditions (e.g. low temperature, drought).

Technique	Yes/No
a) Cyclone	No
b) Fabric filter	No
c) Wet scrubbing	yes
d) Water injection into the shredder	No

From details provided in the application, there is no wet scrubber on site. Moreover it is our understanding that a water dousing system (Bat 25d) for the shredder is in place. Applicant is to clarify accordingly.

Ameneded
25d

	Kindly note there has been no changes from the previous version submitted. Kindly clarify query previously posed by ERA.
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Table 6.3 : BAT-associated emission level (BAT-AEL) for channelled dust emissions to air from the mechanical treatment of waste

Parameter	Unit	BAT-AEL (Average over the sampling period)
Dust	mg/Nm ³	2–5 ⁽¹⁾
⁽¹⁾ When a fabric filter is not applicable, the upper end of the range is 10 mg/Nm ³ .		

The associated monitoring is given in BAT 8.

2.2 BAT conclusions for the mechanical treatment in shredders of metal waste																																	
Unless otherwise stated, the BAT conclusions presented in this section apply to the mechanical treatment in shredders of metal waste, in addition to BAT 25.																																	
2.2.1 Overall environmental performance																																	
BAT 26 In order to improve the overall environmental performance, and to prevent emissions due to accidents and incidents, BAT is to use BAT 14g and all of the techniques given below: a. implementation of a detailed inspection procedure for baled waste before shredding; b. removal of dangerous items from the waste input stream and their safe disposal (e.g. gas cylinders, non-depolluted EoLVs, non-depolluted WEEE, items contaminated with PCBs or mercury, radioactive items); c. treatment of containers only when accompanied by a declaration of cleanliness.				Kindly specify how each of the following techniques shall be implemented in order to improve the overall environmental performance improve? <table><tr><th colspan="2">Technique</th></tr><tr><td>a) Implementation of a detailed inspection procedure for baled waste before shredding</td><td></td></tr><tr><td colspan="2">Baled waste is not shredded; N/A</td></tr><tr><td>b) Removal of dangerous items from the waste input stream and their safe disposal (e.g. gas cylinders, non-depolluted EoLVs, non-depolluted WEEE, items contaminated with PCBs or mercury, radioactive items)</td><td></td></tr><tr><td colspan="2">All shredded material is visually inspected prior to shredding whereas material is inspected for radioactivity when it reaches site. EoLV are cleaned from any mercury switches during the depolution process.</td></tr><tr><td colspan="2">c) Treatment of containers only when accompanied by a declaration of cleanliness</td><td></td></tr><tr><td colspan="2">Any metal containers are free from contaminants prior to use for storage puposes</td><td></td></tr></table>				Technique		a) Implementation of a detailed inspection procedure for baled waste before shredding		Baled waste is not shredded; N/A		b) Removal of dangerous items from the waste input stream and their safe disposal (e.g. gas cylinders, non-depolluted EoLVs, non-depolluted WEEE, items contaminated with PCBs or mercury, radioactive items)		All shredded material is visually inspected prior to shredding whereas material is inspected for radioactivity when it reaches site. EoLV are cleaned from any mercury switches during the depolution process.		c) Treatment of containers only when accompanied by a declaration of cleanliness			Any metal containers are free from contaminants prior to use for storage puposes			Noted as stated above kindly provide waste acceptance procedure and depollution precrocudres. Such procedure shall describe how waste containers (e.g. metal packaging) are accompanied with a declaration of cleanness prior to on-site treatment (eg. Shredding) apart from visual inspections.				Kindly provide					
								Technique																									
								a) Implementation of a detailed inspection procedure for baled waste before shredding																									
								Baled waste is not shredded; N/A																									
								b) Removal of dangerous items from the waste input stream and their safe disposal (e.g. gas cylinders, non-depolluted EoLVs, non-depolluted WEEE, items contaminated with PCBs or mercury, radioactive items)																									
All shredded material is visually inspected prior to shredding whereas material is inspected for radioactivity when it reaches site. EoLV are cleaned from any mercury switches during the depolution process.																																	
c) Treatment of containers only when accompanied by a declaration of cleanliness																																	
Any metal containers are free from contaminants prior to use for storage puposes																																	
BAT 27 In order to prevent deflagrations and to reduce emissions when deflagrations occur, BAT is to use technique a. and one or both of the techniques b. and c. given below. <table><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Deflagration management plan</td><td>This includes: —a deflagration reduction programme designed to identify the source(s), and to implement measures to prevent deflagration occurrences, e.g. inspection of waste input as described in BAT 26a, removal of dangerous items as described in BAT 26b;</td><td>Generally applicable.</td></tr></table>				Technique		Description	Applicability	a.	Deflagration management plan	This includes: —a deflagration reduction programme designed to identify the source(s), and to implement measures to prevent deflagration occurrences, e.g. inspection of waste input as described in BAT 26a, removal of dangerous items as described in BAT 26b;	Generally applicable.	Which techniques will be used to prevent deflagrations as well as to reduce emissions from deflagrations ? <table><tr><th colspan="2">Technique</th><th>Yes/No</th></tr><tr><td>a)</td><td>Deflagration management plan</td><td>No</td></tr><tr><td>b)</td><td>Pressure relief dampers</td><td>No</td></tr><tr><td>c)</td><td>Pre-shredding</td><td>No</td></tr></table>				Technique		Yes/No	a)	Deflagration management plan	No	b)	Pressure relief dampers	No	c)	Pre-shredding	No	Applicant is to either provide a deflgration management plan or indicate how measures B and C shall be implemented. In case any measures are not implemented, kindly provide timeframes for consideration in the improvement programme.		No deflagration is required or takes place prior to shredding		Kindly provide with reference to the measures described in the BREF document and this same BAT conclusion. Update: DEflagration plan [to check if there anything else needed in DP]	
				Technique		Description	Applicability																										
				a.	Deflagration management plan	This includes: —a deflagration reduction programme designed to identify the source(s), and to implement measures to prevent deflagration occurrences, e.g. inspection of waste input as described in BAT 26a, removal of dangerous items as described in BAT 26b;	Generally applicable.																										
				Technique		Yes/No																											
				a)	Deflagration management plan	No																											
b)	Pressure relief dampers	No																															
c)	Pre-shredding	No																															

		<p>—a review of historical deflagration incidents and remedies and the dissemination of deflagration knowledge;</p> <p>—a protocol for response to deflagration incidents.</p>					
b.	Pressure relief dampers	Pressure relief dampers are installed to relieve pressure waves coming from deflagrations that would otherwise cause major damage and subsequent emissions.					
c.	Pre-shredding	Use of a low-speed shredder installed upstream of the main shredder	<p>Generally applicable for new plants, depending on the input material.</p> <p>Applicable for major plant upgrades where a significant number of deflagrations have been substantiated.</p>				
2.2.3 Energy efficiency							
BAT 28 In order to use energy efficiently, BAT is to keep the shredder feed stable. Description The shredder feed is equalised by avoiding disruption or overload of the waste feed which would lead to unwanted shutdowns and start-ups of the shredder.				<p>Kindly specify how the shredder operations shall be stabilised to ensure efficient use of energy?</p> <p>Shredder is only used for short periods of time at a go during which time it is fed continuously thus maximising productivity and reducing energy costs.</p>	Noted.		

2.3 BAT conclusions for the treatment of WEEE containing VFCs and/or VHCs							
Unless otherwise stated, the BAT conclusions presented in this section apply to the treatment of WEEE containing VFCs and/or VHCs, in addition to BAT 25.							
2.3.1 Emissions to air							
BAT 29							noted

In order to prevent or, where that is not practicable, to reduce emissions of organic compounds to air, BAT is to apply BAT 14d, BAT 14h and to use technique a. and one or both of the techniques b. and c. given below.			Kindly specify how technique a. and one of both of techniques b. and c. shall be implemented to ensure that emissions of organic compounds to air shall be prevented and reduced?																																			
<table><tr><th colspan="2">Technique</th><th>Description</th></tr><tr><td>a.</td><td>Optimised removal and capture of refrigerants and oils</td><td>All refrigerants and oils are removed from the WEEE containing VFCs and/or VHCs and captured by a vacuum suction system (e.g. achieving refrigerant removal of at least 90 %). Refrigerants are separated from oils and the oils are degassed. The amount of oil remaining in the compressor is reduced to a minimum (so that the compressor does not drip).</td></tr><tr><td>b.</td><td>Cryogenic condensation</td><td>Waste gas containing organic compounds such as VFCs/VHCs is sent to a cryogenic condensation unit where they are liquefied (see description in Section 6.1). The liquefied gas is stored in pressurised vessels for further treatment.</td></tr><tr><td>c.</td><td>Adsorption</td><td>Waste gas containing organic compounds such as VFCs/VHCs is led into adsorption systems (see description in Section 6.1). The spent activated carbon is regenerated by means of heated air pumped into the filter to desorb the organic compounds. Subsequently, the regeneration waste gas is compressed and cooled in order to liquefy the organic compounds (in some cases by cryogenic condensation). The liquefied gas is then stored in pressurised vessels. The remaining waste gas from the compression stage is usually led back into the adsorption system in order to minimise VFC/VHC emissions.</td></tr></table>			Technique		Description	a.	Optimised removal and capture of refrigerants and oils	All refrigerants and oils are removed from the WEEE containing VFCs and/or VHCs and captured by a vacuum suction system (e.g. achieving refrigerant removal of at least 90 %). Refrigerants are separated from oils and the oils are degassed. The amount of oil remaining in the compressor is reduced to a minimum (so that the compressor does not drip).	b.	Cryogenic condensation	Waste gas containing organic compounds such as VFCs/VHCs is sent to a cryogenic condensation unit where they are liquefied (see description in Section 6.1). The liquefied gas is stored in pressurised vessels for further treatment.	c.	Adsorption	Waste gas containing organic compounds such as VFCs/VHCs is led into adsorption systems (see description in Section 6.1). The spent activated carbon is regenerated by means of heated air pumped into the filter to desorb the organic compounds. Subsequently, the regeneration waste gas is compressed and cooled in order to liquefy the organic compounds (in some cases by cryogenic condensation). The liquefied gas is then stored in pressurised vessels. The remaining waste gas from the compression stage is usually led back into the adsorption system in order to minimise VFC/VHC emissions.	<table><tr><th colspan="2">Technique</th><th>Yes/No</th></tr><tr><td>a)</td><td>Optimized removal and capture of refrigerants and oils</td><td>N/A</td></tr><tr><td colspan="3"></td></tr><tr><td>b)</td><td>Cryogenic condensation</td><td>N/A</td></tr><tr><td colspan="3"></td></tr><tr><td>c)</td><td>Adsorption</td><td>N/A</td></tr><tr><td colspan="3"></td></tr></table>		Technique		Yes/No	a)	Optimized removal and capture of refrigerants and oils	N/A				b)	Cryogenic condensation	N/A				c)	Adsorption	N/A				
Technique		Description																																				
a.	Optimised removal and capture of refrigerants and oils	All refrigerants and oils are removed from the WEEE containing VFCs and/or VHCs and captured by a vacuum suction system (e.g. achieving refrigerant removal of at least 90 %). Refrigerants are separated from oils and the oils are degassed. The amount of oil remaining in the compressor is reduced to a minimum (so that the compressor does not drip).																																				
b.	Cryogenic condensation	Waste gas containing organic compounds such as VFCs/VHCs is sent to a cryogenic condensation unit where they are liquefied (see description in Section 6.1). The liquefied gas is stored in pressurised vessels for further treatment.																																				
c.	Adsorption	Waste gas containing organic compounds such as VFCs/VHCs is led into adsorption systems (see description in Section 6.1). The spent activated carbon is regenerated by means of heated air pumped into the filter to desorb the organic compounds. Subsequently, the regeneration waste gas is compressed and cooled in order to liquefy the organic compounds (in some cases by cryogenic condensation). The liquefied gas is then stored in pressurised vessels. The remaining waste gas from the compression stage is usually led back into the adsorption system in order to minimise VFC/VHC emissions.																																				
Technique		Yes/No																																				
a)	Optimized removal and capture of refrigerants and oils	N/A																																				
b)	Cryogenic condensation	N/A																																				
c)	Adsorption	N/A																																				
Table 6.4 : BAT-associated emission levels (BAT-AELs) for channelled TVOC and CFC emissions to air from the treatment of WEEE containing VFCs and/or VHCs			Kindly specify the emissions level which the proposed techniques is expected to achieve and include monitoring details as part of the monitoring programme submitted in section B3.10 of the application. N/A																																			
<table><tr><th>Parameter</th><th>Unit</th><th>BAT-AEL (Average over the sampling period)</th></tr><tr><td>TVOC</td><td>mg/Nm³</td><td>3-15</td></tr><tr><td>CFCs</td><td>mg/Nm³</td><td>0,5-10</td></tr></table>			Parameter	Unit	BAT-AEL (Average over the sampling period)	TVOC	mg/Nm ³	3-15	CFCs	mg/Nm ³	0,5-10																											
Parameter	Unit	BAT-AEL (Average over the sampling period)																																				
TVOC	mg/Nm ³	3-15																																				
CFCs	mg/Nm ³	0,5-10																																				
The associated monitoring is given in BAT 8.																																						
2.3.2 Explosions																																						
BAT 30 In order to prevent emissions due to explosions when treating WEEE containing VFCs and/or VHCs, BAT is to use either of the techniques given below.			How will emissions from explosions be prevented when treating WEEE containing VFCs and/or VHCs? Which techniques will be suitable for use and application?		noted																																	
			<table><tr><th>Technique</th><th>Yes/No</th></tr></table>		Technique	Yes/No																																
Technique	Yes/No																																					

Technique		Description	a) Inert atmosphere		N/A
b) Forced ventilation					N/A
a.	Inert atmosphere	By injecting inert gas (e.g. nitrogen), the oxygen concentration in enclosed equipment (e.g. in enclosed shredders, crushers, dust and foam collectors) is reduced (e.g. to 4 vol-%).			
b.	Forced ventilation	By using forced ventilation, the hydrocarbon concentration in enclosed equipment (e.g. in enclosed shredders, crushers, dust and foam collectors) is reduced to < 25 % of the lower explosive limit.			

2.4 BAT conclusions for the mechanical treatment of waste with calorific value																					
In addition to BAT 25, the BAT conclusions presented in this section apply to the mechanical treatment of waste with calorific value covered by points 5.3(a)(iii) and 5.3(b)(ii) of Annex I to Directive 2010/75/EU.																					
2.4.1 Emissions to air																					
BAT 31 In order to reduce emissions to air of organic compounds, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.					Kindly specify which of the following techniques shall be implemented to reduce emissions to air of organic compounds. <table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>a) Adsorption</td><td>N/A</td></tr><tr><td>b) Biofilter</td><td>N/A</td></tr><tr><td>c) Thermal oxidation</td><td>N/A</td></tr><tr><td>d) Wet scrubbing</td><td>N/A</td></tr></table> Kindly specify the emissions levels which the proposed technique(s) is expected to achieve and include monitoring details as part of the monitoring programme submitted in section B3.10 of the application.					Technique	Yes/No	a) Adsorption	N/A	b) Biofilter	N/A	c) Thermal oxidation	N/A	d) Wet scrubbing	N/A		
Technique	Yes/No																				
a) Adsorption	N/A																				
b) Biofilter	N/A																				
c) Thermal oxidation	N/A																				
d) Wet scrubbing	N/A																				
<table><tr><th colspan="2">Technique</th><th>Description</th></tr><tr><td>a.</td><td>Adsorption</td><td rowspan="4">See Section 6.1.</td></tr><tr><td>b.</td><td>Biofilter</td></tr><tr><td>c.</td><td>Thermal oxidation</td></tr><tr><td>d.</td><td>Wet scrubbing</td></tr></table>					Technique		Description	a.	Adsorption	See Section 6.1.	b.	Biofilter	c.	Thermal oxidation	d.	Wet scrubbing					
Technique		Description																			
a.	Adsorption	See Section 6.1.																			
b.	Biofilter																				
c.	Thermal oxidation																				
d.	Wet scrubbing																				
Table 6.5: BAT-associated emission level (BAT-AEL) for channelled TVOC emissions to air from the mechanical treatment of waste with calorific value																					
Parameter		Unit	BAT-AEL (Average over the sampling period)																		
TVOC		mg/Nm ³	10–30 ⁽¹⁾																		
⁽¹⁾ The BAT-AEL only applies when organic compounds are identified as relevant in the waste gas stream, based on the inventory mentioned in BAT 3.																					
The associated monitoring is given in BAT 8.																					

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2.5. BAT conclusions for the mechanical treatment of WEEE containing mercury Unless otherwise stated, the BAT conclusions presented in this section apply to the mechanical treatment of WEEE containing mercury, in addition to BAT 25.								
2.5.1. Emissions to air								
BAT 32 In order to reduce mercury emissions to air, BAT is to collect mercury emissions at source, to send them to abatement and to carry out adequate monitoring. Description This includes all of the following measures: <ul style="list-style-type: none"> • equipment used to treat WEEE containing mercury is enclosed, under negative pressure and connected to a local exhaust ventilation (LEV) system; • waste gas from the processes is treated by dedusting techniques such as cyclones, fabric filters, and HEPA filters, followed by adsorption on activated carbon (see Section 6.1); • the efficiency of the waste gas treatment is monitored; • mercury levels in the treatment and storage areas are measured frequently (e.g. once every week) to detect potential mercury leaks. Table 6.6: BAT-associated emission level (BAT-AEL) for channelled mercury emissions to air from the mechanical treatment of WEEE containing mercury <table border="1"> <thead> <tr> <th>Parameter</th><th>Unit</th><th>BAT-AEL (Average over the sampling period)</th></tr> </thead> <tbody> <tr> <td>Mercury (Hg)</td><td>µg/Nm³</td><td>2–7</td></tr> </tbody> </table> The associated monitoring is given in BAT 8.	Parameter	Unit	BAT-AEL (Average over the sampling period)	Mercury (Hg)	µg/Nm ³	2–7	Which measures and schemes will be implemented to reduce mercury emissions to air? N/A	noted
Parameter	Unit	BAT-AEL (Average over the sampling period)						
Mercury (Hg)	µg/Nm ³	2–7						

3. BAT conclusions for the biological treatment of waste Unless otherwise stated, the BAT conclusions presented in Section 3 apply to the biological treatment of waste, and in addition to the general BAT conclusions in Section 1. The BAT conclusions in Section 3 do not apply to the treatment of water-based liquid waste.		
3.1. General BAT conclusions for the biological treatment of waste		
3.1.1. Overall environmental performance		
BAT 33 In order to reduce odour emissions and to improve the overall environmental performance, BAT is to select the waste input. Description The technique consists of carrying out the pre-acceptance, acceptance and sorting of the waste input (see BAT 2) so as to ensure the suitability of the waste input for the waste treatment, e.g. in	Kindly describe the relevant technique which will be implemented in order to reduce odour emissions and improving the overall environmental performance in relation to waste input? N/A	noted

terms of nutrient balance, moisture or toxic compounds which may reduce the biological activity.																																			
3.1.2. Emissions to air																																			
<p>BAT 34</p> <p>In order to reduce channelled emissions to air of dust, organic compounds and odorous compounds, including H2S and NH3, BAT is to use one or a combination of the techniques given below.</p>			<p>Kindly specify which technique shall be implemented to reduce channelled emissions to air of dust, organic and odorous compounds be reduced?</p>																																
<table><thead><tr><th colspan="2">Technique</th><th>Description</th></tr></thead><tbody><tr><td>a.</td><td>Adsorption</td><td>See Section 6.1.</td></tr><tr><td>b.</td><td>Biofilter</td><td>See Section 6.1. A pretreatment of the waste gas before the biofilter (e.g. with a water or acid scrubber) may be needed in the case of a high NH₃ content (e.g. 5-40 mg/Nm³) in order to control the media pH and to limit the formation of N₂O in the biofilter. Some other odorous compounds (e.g. mercaptans, H₂S) can cause acidification of the biofilter media and necessitate the use of a water or alkaline scrubber for pretreatment of the waste gas before the biofilter.</td></tr><tr><td>c.</td><td>Fabric filter</td><td>See Section 6.1. The fabric filter is used in the case of mechanical biological treatment of waste.</td></tr><tr><td>d.</td><td>Thermal oxidation</td><td>See Section 6.1.</td></tr><tr><td>e.</td><td>Wet scrubbing</td><td>See Section 6.1. Water, acid or alkaline scrubbers are used in combination with a biofilter, thermal oxidation or adsorption on activated carbon.</td></tr></tbody></table>			Technique		Description	a.	Adsorption	See Section 6.1.	b.	Biofilter	See Section 6.1. A pretreatment of the waste gas before the biofilter (e.g. with a water or acid scrubber) may be needed in the case of a high NH ₃ content (e.g. 5-40 mg/Nm ³) in order to control the media pH and to limit the formation of N ₂ O in the biofilter. Some other odorous compounds (e.g. mercaptans, H ₂ S) can cause acidification of the biofilter media and necessitate the use of a water or alkaline scrubber for pretreatment of the waste gas before the biofilter.	c.	Fabric filter	See Section 6.1. The fabric filter is used in the case of mechanical biological treatment of waste.	d.	Thermal oxidation	See Section 6.1.	e.	Wet scrubbing	See Section 6.1. Water, acid or alkaline scrubbers are used in combination with a biofilter, thermal oxidation or adsorption on activated carbon.	<table><thead><tr><th>Technique</th><th>Yes/No</th></tr></thead><tbody><tr><td>a) Adsorption</td><td>N/A</td></tr><tr><td>b) Biofilter</td><td>N/A</td></tr><tr><td>c) Fabric filter</td><td>N/A</td></tr><tr><td>d) Thermal oxidation</td><td>N/A</td></tr><tr><td>e) Wet scrubbing</td><td>N/A</td></tr></tbody></table> <p>Kindly specify the emissions level which the proposed technique(s) is expected to achieve and include monitoring details as part of the monitoring programme submitted in section B3.10 of the application.</p> <p>N/A</p>			Technique	Yes/No	a) Adsorption	N/A	b) Biofilter	N/A	c) Fabric filter	N/A	d) Thermal oxidation	N/A	e) Wet scrubbing	N/A
Technique		Description																																	
a.	Adsorption	See Section 6.1.																																	
b.	Biofilter	See Section 6.1. A pretreatment of the waste gas before the biofilter (e.g. with a water or acid scrubber) may be needed in the case of a high NH ₃ content (e.g. 5-40 mg/Nm ³) in order to control the media pH and to limit the formation of N ₂ O in the biofilter. Some other odorous compounds (e.g. mercaptans, H ₂ S) can cause acidification of the biofilter media and necessitate the use of a water or alkaline scrubber for pretreatment of the waste gas before the biofilter.																																	
c.	Fabric filter	See Section 6.1. The fabric filter is used in the case of mechanical biological treatment of waste.																																	
d.	Thermal oxidation	See Section 6.1.																																	
e.	Wet scrubbing	See Section 6.1. Water, acid or alkaline scrubbers are used in combination with a biofilter, thermal oxidation or adsorption on activated carbon.																																	
Technique	Yes/No																																		
a) Adsorption	N/A																																		
b) Biofilter	N/A																																		
c) Fabric filter	N/A																																		
d) Thermal oxidation	N/A																																		
e) Wet scrubbing	N/A																																		
<p>Table 6.7: BAT-associated emission levels (BAT-AELs) for channelled NH3, odour, dust and TVOC emissions to air from the biological treatment of waste</p> <table><thead><tr><th>Parameter</th><th>Unit</th><th>BAT-AEL (Average over the sampling period)</th><th>Waste treatment process</th></tr></thead><tbody><tr><td>NH3 ⁽¹⁾ ⁽²⁾</td><td>mg/Nm³</td><td>0.3–20</td><td rowspan="2">All biological treatments of waste</td></tr><tr><td>Odour concentration ⁽¹⁾ ⁽²⁾</td><td>ouE /Nm³</td><td>200–1 000</td></tr><tr><td>Dust</td><td>mg/Nm³</td><td>2–5</td><td rowspan="2">Mechanical biological treatment of waste</td></tr><tr><td>TVOC</td><td>mg/Nm³</td><td>5–40 ⁽³⁾</td></tr></tbody></table>						Parameter	Unit	BAT-AEL (Average over the sampling period)	Waste treatment process	NH3 ⁽¹⁾ ⁽²⁾	mg/Nm ³	0.3–20	All biological treatments of waste	Odour concentration ⁽¹⁾ ⁽²⁾	ouE /Nm ³	200–1 000	Dust	mg/Nm ³	2–5	Mechanical biological treatment of waste	TVOC	mg/Nm ³	5–40 ⁽³⁾												
Parameter	Unit	BAT-AEL (Average over the sampling period)	Waste treatment process																																
NH3 ⁽¹⁾ ⁽²⁾	mg/Nm ³	0.3–20	All biological treatments of waste																																
Odour concentration ⁽¹⁾ ⁽²⁾	ouE /Nm ³	200–1 000																																	
Dust	mg/Nm ³	2–5	Mechanical biological treatment of waste																																
TVOC	mg/Nm ³	5–40 ⁽³⁾																																	

<p>(1) Either the BAT-AEL for NH₃ or the BAT-AEL for the odour concentration applies.</p> <p>(2) This BAT-AEL does not apply to the treatment of waste mainly composed of manure.</p> <p>(3) The lower end of the range can be achieved by using thermal oxidation.</p>			
The associated monitoring is given in BAT 8.			

3.1.3. Emissions to water and water usage																							
BAT 35 In order to reduce the generation of waste water and to reduce water usage, BAT is to use all of the techniques given below.					Kindly provide a description of how each of the following techniques shall be implemented to reduce the generation of waste water, as well as water usage?		In BAT 19 it is stated that water recirculation and waste water segregations takes places, kindly clarify	See above	Clarify the query put forward by ERA within this section.														
										Technique													
										a) Segregation of water streams													
										Runoff rain water from clean areas is channelled into a clean water reservoir; This is used for flushings and toilets on site before being disposed into a cesspit. Run-off from other surfaces is passed through silt trap and separator and channelled into a larger water reservoir; This water is used for water dousing and also as a circular water flow instead of a radiator for the shredder so it's cooling efficiency is greatly increased. It is also used as a source of water in case of any fires.													
										b) Water recirculation													
		See above																					
		c) Minimization of the generation of leachate																					
		N/A																					
<table><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Segregation of water streams</td><td>Leachate seeping from compost piles and windrows is segregated from surface run-off water (see BAT 19f).</td><td>Generally applicable to new plants. Generally applicable to existing plants within the constraints associated with the layout of the water circuits.</td></tr><tr><td>b.</td><td>Water recirculation</td><td>Recirculating process water streams (e.g. from dewatering of liquid digestate in anaerobic processes) or using as much as possible other water streams (e.g. water condensate, rinsing water, surface run-off water). The degree of recirculation is limited by the water balance of the plant, the content of impurities (e.g. heavy metals, salts, pathogens, odorous compounds) and/or the characteristics of the water streams (e.g. nutrient content).</td><td>Generally applicable.</td></tr><tr><td>c.</td><td>Minimisation of the generation of leachate</td><td>Optimising the moisture content of the waste in order to minimise the generation of leachate.</td><td>Generally applicable.</td></tr></table>					Technique		Description	Applicability	a.	Segregation of water streams	Leachate seeping from compost piles and windrows is segregated from surface run-off water (see BAT 19f).	Generally applicable to new plants. Generally applicable to existing plants within the constraints associated with the layout of the water circuits.	b.	Water recirculation	Recirculating process water streams (e.g. from dewatering of liquid digestate in anaerobic processes) or using as much as possible other water streams (e.g. water condensate, rinsing water, surface run-off water). The degree of recirculation is limited by the water balance of the plant, the content of impurities (e.g. heavy metals, salts, pathogens, odorous compounds) and/or the characteristics of the water streams (e.g. nutrient content).	Generally applicable.	c.	Minimisation of the generation of leachate	Optimising the moisture content of the waste in order to minimise the generation of leachate.	Generally applicable.			
Technique		Description	Applicability																				
a.	Segregation of water streams	Leachate seeping from compost piles and windrows is segregated from surface run-off water (see BAT 19f).	Generally applicable to new plants. Generally applicable to existing plants within the constraints associated with the layout of the water circuits.																				
b.	Water recirculation	Recirculating process water streams (e.g. from dewatering of liquid digestate in anaerobic processes) or using as much as possible other water streams (e.g. water condensate, rinsing water, surface run-off water). The degree of recirculation is limited by the water balance of the plant, the content of impurities (e.g. heavy metals, salts, pathogens, odorous compounds) and/or the characteristics of the water streams (e.g. nutrient content).	Generally applicable.																				
c.	Minimisation of the generation of leachate	Optimising the moisture content of the waste in order to minimise the generation of leachate.	Generally applicable.																				

3.2 BAT conclusions for the aerobic treatment of waste	
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Unless otherwise stated, the BAT conclusions presented in this section apply to the aerobic treatment of waste, and in addition to the general BAT conclusions for the biological treatment of waste in Section 3.1																	
3.2.1. Overall environmental performance																	
BAT 36 In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters. Description Monitoring and/or control of key waste and process parameters, including: <ul style="list-style-type: none">waste input characteristics (e.g. C to N ratio, particle size);temperature and moisture content at different points in the windrow;aeration of the windrow (e.g. via the windrow turning frequency, O₂ and/or CO₂ concentration in the windrow, temperature of air streams in the case of forced aeration);windrow porosity, height and width. Applicability Monitoring of the moisture content in the windrow is not applicable to enclosed processes when health and/or safety issues have been identified. In that case, the moisture content can be monitored before loading the waste into the enclosed composting stage and adjusted when it exits the enclosed composting stage.					How will emissions to air be reduced? Which strategy will be utilized to improve the overall environmental performance? Which of the following waste and process parameters will be monitored?		Non-applicability is noted,										
					<table><tr><th>Parameters</th><th>Yes/No</th></tr><tr><td>a) Waste input characteristics (e.g. C to N ratio, particle size)</td><td>N/A</td></tr><tr><td>b) Temperature and moisture content at different points in the windrow</td><td>N/A</td></tr><tr><td>c) Aeration of the windrow (e.g. via the windrow turning frequency, O₂ and/or CO₂ concentration in the windrow, temperature of air streams in the case of forced aeration)</td><td>N/A</td></tr><tr><td>d) Windrow porosity, height and width</td><td>N/A</td></tr></table>			Parameters	Yes/No	a) Waste input characteristics (e.g. C to N ratio, particle size)	N/A	b) Temperature and moisture content at different points in the windrow	N/A	c) Aeration of the windrow (e.g. via the windrow turning frequency, O ₂ and/or CO ₂ concentration in the windrow, temperature of air streams in the case of forced aeration)	N/A	d) Windrow porosity, height and width	N/A
					Parameters	Yes/No											
					a) Waste input characteristics (e.g. C to N ratio, particle size)	N/A											
					b) Temperature and moisture content at different points in the windrow	N/A											
c) Aeration of the windrow (e.g. via the windrow turning frequency, O ₂ and/or CO ₂ concentration in the windrow, temperature of air streams in the case of forced aeration)	N/A																
d) Windrow porosity, height and width	N/A																
3.2.2. Odour and diffuse emissions to air																	
BAT 37 In order to reduce diffuse emissions to air of dust, odour and bioaerosols from open-air treatment steps, BAT is to use one or both of the techniques given below.					How will diffuse emissions to air of dust, odour and bioaerosols be reduced from open-air treatment steps? Will the following techniques be used in order to do so?		Non-applicability is noted,										
Technique		Description		Applicability													
a.	Use of semipermeable membrane covers	Active composting windrows are covered by semipermeable membranes.		Generally applicable.													

b.	Adaptation of operations to the meteorological conditions	<p>This includes techniques such as the following:</p> <p>—Taking into account weather conditions and forecasts when undertaking major outdoor process activities. For instance, avoiding formation or turning of windrows or piles, screening or shredding in the case of adverse meteorological conditions in terms of emissions dispersion (e.g. the wind speed is too low or too high, or the wind blows in the direction of sensitive receptors).</p> <p>—Orientating windrows, so that the smallest possible area of composting mass is exposed to the prevailing wind, to reduce the dispersion of pollutants from the windrow surface. The windrows and piles are preferably located at the lowest elevation within the overall site layout.</p>	Generally applicable.	<table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>a) Use of semipermeable membrane covers</td><td>N/A</td></tr><tr><td>b) Adaptation of operations to the meteorological conditions</td><td>N/A</td></tr></table>	Technique	Yes/No	a) Use of semipermeable membrane covers	N/A	b) Adaptation of operations to the meteorological conditions	N/A
				Technique	Yes/No					
				a) Use of semipermeable membrane covers	N/A					
b) Adaptation of operations to the meteorological conditions	N/A									
<p>If none of the above techniques is currently being implemented, kindly provide a proposal including timeframes of the technique which shall be implemented.</p> <p>N/A</p>										

3.3 BAT conclusions for the anaerobic treatment of waste																
Unless otherwise stated, the BAT conclusions presented in this section apply to the anaerobic treatment of waste, and in addition to the general BAT conclusions for the biological treatment of waste in Section 3.1.																
3.3.1. Emissions to air																
<p>BAT 38 In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters.</p> <p>Description Implementation of a manual and/or automatic monitoring system to:</p> <ul style="list-style-type: none">• ensure a stable digester operation;• minimise operational difficulties, such as foaming, which may lead to odour emissions;• provide sufficient early warning of system failures which may lead to a loss of containment and explosions. <p>This includes monitoring and/or control of key waste and process parameters, e.g.:</p> <ul style="list-style-type: none">• pH and alkalinity of the digester feed;• digester operating temperature;• hydraulic and organic loading rates of the digester feed;• concentration of volatile fatty acids (VFA) and ammonia within the digester and digestate;• biogas quantity, composition (e.g. H₂S) and pressure;• liquid and foam levels in the digester.	<p>How can a reduction in emissions to air be achieved along with improvements in the overall environmental performance? Which of the following key waste and process parameters will be monitored?</p> <table><tr><th>Parameters</th><th>Yes/No</th></tr><tr><td>a) pH and alkalinity of the digester feed</td><td>N/A</td></tr><tr><td>b) digester operating temperature</td><td>N/A</td></tr><tr><td>c) hydraulic and organic loading rates of the digester feed</td><td>N/A</td></tr><tr><td>d) concentration of volatile fatty acids (VFA) and ammonia within the digester and digestate</td><td>N/A</td></tr><tr><td>e) biogas quantity, composition (e.g. H₂S) and pressure</td><td>N/A</td></tr><tr><td>f) liquid and foam levels in the digester</td><td>N/A</td></tr></table>	Parameters	Yes/No	a) pH and alkalinity of the digester feed	N/A	b) digester operating temperature	N/A	c) hydraulic and organic loading rates of the digester feed	N/A	d) concentration of volatile fatty acids (VFA) and ammonia within the digester and digestate	N/A	e) biogas quantity, composition (e.g. H ₂ S) and pressure	N/A	f) liquid and foam levels in the digester	N/A	Non-applicability is noted,
Parameters	Yes/No															
a) pH and alkalinity of the digester feed	N/A															
b) digester operating temperature	N/A															
c) hydraulic and organic loading rates of the digester feed	N/A															
d) concentration of volatile fatty acids (VFA) and ammonia within the digester and digestate	N/A															
e) biogas quantity, composition (e.g. H ₂ S) and pressure	N/A															
f) liquid and foam levels in the digester	N/A															

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3.4 BAT conclusions for the mechanical biological treatment (MBT) of waste																					
Unless otherwise stated, the BAT conclusions presented in this section apply to MBT, and in addition to the general BAT conclusions for the biological treatment of waste in Section 3.1.																					
The BAT conclusions for the aerobic treatment (Section 3.2) and anaerobic treatment (Section 3.3) of waste apply, when relevant, to the mechanical biological treatment of waste.																					
3.4.1. Emissions to air																					
BAT 39 In order to reduce emissions to air, BAT is to use both of the techniques given below.				Kindly provide details of how each of the following techniques is or will be applied?	Non-applicability is noted,																
<table><thead><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr></thead><tbody><tr><td>a.</td><td>Segregation of the waste gas streams</td><td>Splitting of the total waste gas stream into waste gas streams with a high pollutant content and waste gas streams with a low pollutant content, as identified in the inventory mentioned in BAT 3.</td><td rowspan="2">Generally applicable to new plants. Generally applicable to existing plants within the constraints associated with the layout of the air circuits.</td></tr><tr><td>b.</td><td>Recirculation of waste gas</td><td>Recirculation of waste gas with a low pollutant content in the biological process followed by waste gas treatment adapted to the concentration of pollutants (see BAT 34). The use of waste gas in the biological process may be limited by the waste gas temperature and/or the pollutant content. It may be necessary to condense the water vapour contained in the waste gas before reuse. In this case, cooling is necessary, and the condensed water is recirculated when possible (see BAT 35) or treated before discharge.</td></tr></tbody></table>				Technique		Description	Applicability	a.	Segregation of the waste gas streams	Splitting of the total waste gas stream into waste gas streams with a high pollutant content and waste gas streams with a low pollutant content, as identified in the inventory mentioned in BAT 3.	Generally applicable to new plants. Generally applicable to existing plants within the constraints associated with the layout of the air circuits.	b.	Recirculation of waste gas	Recirculation of waste gas with a low pollutant content in the biological process followed by waste gas treatment adapted to the concentration of pollutants (see BAT 34). The use of waste gas in the biological process may be limited by the waste gas temperature and/or the pollutant content. It may be necessary to condense the water vapour contained in the waste gas before reuse. In this case, cooling is necessary, and the condensed water is recirculated when possible (see BAT 35) or treated before discharge.	<table><thead><tr><th>Technique</th></tr></thead><tbody><tr><td>a) Segregation of the waste gas streams</td></tr><tr><td>N/A</td></tr><tr><td>b) Recirculation of waste gas</td></tr><tr><td>N/A</td></tr></tbody></table>	Technique	a) Segregation of the waste gas streams	N/A	b) Recirculation of waste gas	N/A	
Technique		Description	Applicability																		
a.	Segregation of the waste gas streams	Splitting of the total waste gas stream into waste gas streams with a high pollutant content and waste gas streams with a low pollutant content, as identified in the inventory mentioned in BAT 3.	Generally applicable to new plants. Generally applicable to existing plants within the constraints associated with the layout of the air circuits.																		
b.	Recirculation of waste gas	Recirculation of waste gas with a low pollutant content in the biological process followed by waste gas treatment adapted to the concentration of pollutants (see BAT 34). The use of waste gas in the biological process may be limited by the waste gas temperature and/or the pollutant content. It may be necessary to condense the water vapour contained in the waste gas before reuse. In this case, cooling is necessary, and the condensed water is recirculated when possible (see BAT 35) or treated before discharge.																			
Technique																					
a) Segregation of the waste gas streams																					
N/A																					
b) Recirculation of waste gas																					
N/A																					

4. BAT conclusions for the physico-chemical treatment of waste		
Unless otherwise stated, the BAT conclusions presented in Section 4 apply to the physico-chemical treatment of waste, and in addition to the general BAT conclusions in Section 1.		
4.1. BAT conclusions for the physico-chemical treatment of solid and/or pasty waste		
4.1.1. Overall environmental performance		
BAT 40 In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2). Description Monitoring the waste input, e.g. in terms of: <ul style="list-style-type: none">content of organics, oxidising agents, metals (e.g. mercury), salts, odorous compounds;	Kindly describe how waste input will be monitored and for which parameters? N/A	Non-applicability is noted,

<ul style="list-style-type: none">H2 formation potential upon mixing of flue-gas treatment residues, e.g. fly ashes, with water.																															
4.1.2. Emissions to air																															
<p>BAT 41 In order to reduce emissions of dust, organic compounds and NH3 to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.</p> <table><thead><tr><th colspan="2">Technique</th><th>Description</th></tr></thead><tbody><tr><td>a.</td><td>Adsorption</td><td rowspan="4">See Section 6.1.</td></tr><tr><td>b.</td><td>Biofilter</td></tr><tr><td>c.</td><td>Fabric filter</td></tr><tr><td>d.</td><td>Wet scrubbing</td></tr></tbody></table> <p>Table 6.8: BAT-associated emission level (BAT-AEL) for channelled emissions of dust to air from the physico-chemical treatment of solid and/or pasty waste</p> <table><thead><tr><th>Parameter</th><th>Unit</th><th>BAT-AEL (Average over the sampling period)</th></tr></thead><tbody><tr><td>Dust</td><td>mg/Nm³</td><td>2–5</td></tr></tbody></table> <p>The associated monitoring is given in BAT 8.</p>		Technique		Description	a.	Adsorption	See Section 6.1.	b.	Biofilter	c.	Fabric filter	d.	Wet scrubbing	Parameter	Unit	BAT-AEL (Average over the sampling period)	Dust	mg/Nm³	2–5	<p>How will emissions of dust, organic compounds and NH3 be reduced? Which technique(s) shall be implemented to mitigate such emissions?</p> <table><thead><tr><th>Technique</th><th>Yes/No</th></tr></thead><tbody><tr><td>a) Adsorption</td><td>N/A</td></tr><tr><td>b) Biofilter</td><td>N/A</td></tr><tr><td>c) Fabric filter</td><td>N/A</td></tr><tr><td>d) Wet scrubbing</td><td>N/A</td></tr></tbody></table> <p>Kindly specify the emission limit which shall be achieved by the selected technology.</p> <p>N/A</p>	Technique	Yes/No	a) Adsorption	N/A	b) Biofilter	N/A	c) Fabric filter	N/A	d) Wet scrubbing	N/A	Non-applicability is noted,
Technique		Description																													
a.	Adsorption	See Section 6.1.																													
b.	Biofilter																														
c.	Fabric filter																														
d.	Wet scrubbing																														
Parameter	Unit	BAT-AEL (Average over the sampling period)																													
Dust	mg/Nm³	2–5																													
Technique	Yes/No																														
a) Adsorption	N/A																														
b) Biofilter	N/A																														
c) Fabric filter	N/A																														
d) Wet scrubbing	N/A																														

4.2 BAT conclusions for the re-refining of waste oil														
4.2.1. Overall environmental performance														
BAT 42 In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2).		Kindly specify how monitoring of the waste input in terms of chlorinated compounds will be carried out.	Non-applicability is noted,											
Description Monitoring of the waste input in terms of content of chlorinated compounds (e.g. chlorinated solvents or PCBs).		N/A												
BAT 43 In order to reduce the quantity of waste sent for disposal, BAT is to use one or both of the techniques given below.		How can the quantity of waste be reduced to minimize amounts sent for disposal? Will the following techniques apply?	Non-applicability is noted,											
<table><thead><tr><th>Technique</th><th>Description</th></tr></thead><tbody><tr><td>a) Material recovery</td><td>Using the organic residues from vacuum distillation, solvent extraction, thin film evaporators, etc. in asphalt products, etc.</td></tr><tr><td>b) Energy recovery</td><td>Using the organic residues from vacuum distillation, solvent extraction, thin film evaporators, etc. to recover energy.</td></tr></tbody></table>		Technique		Description	a) Material recovery	Using the organic residues from vacuum distillation, solvent extraction, thin film evaporators, etc. in asphalt products, etc.	b) Energy recovery	Using the organic residues from vacuum distillation, solvent extraction, thin film evaporators, etc. to recover energy.	<table><thead><tr><th>Technique</th><th>Yes/No</th></tr></thead><tbody><tr><td>a) Material recovery</td><td>N/A</td></tr><tr><td>b) Energy recovery</td><td>N/A</td></tr></tbody></table>	Technique	Yes/No	a) Material recovery	N/A	b) Energy recovery
Technique	Description													
a) Material recovery	Using the organic residues from vacuum distillation, solvent extraction, thin film evaporators, etc. in asphalt products, etc.													
b) Energy recovery	Using the organic residues from vacuum distillation, solvent extraction, thin film evaporators, etc. to recover energy.													
Technique	Yes/No													
a) Material recovery	N/A													
b) Energy recovery	N/A													
4.2.2. Emissions to air														
BAT 44		Kindly specify which of the following techniques shall be applied in order to reduce emissions of organic compounds to air.	Non-applicability is noted,											

In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.			Technique		Yes/No												
			a) Adsorption		N/A												
			b) Thermal oxidation		N/A												
			c) Wet scrubbing		N/A												
<table><thead><tr><th colspan="2">Technique</th><th>Description</th></tr></thead><tbody><tr><td>a.</td><td>Adsorption</td><td>See Section 6.1.</td></tr><tr><td>b.</td><td>Thermal oxidation</td><td>See Section 6.1. This includes when the waste gas is sent to a process furnace or a boiler.</td></tr><tr><td>c.</td><td>Wet scrubbing</td><td>See Section 6.1.</td></tr></tbody></table>			Technique		Description	a.	Adsorption	See Section 6.1.	b.	Thermal oxidation	See Section 6.1. This includes when the waste gas is sent to a process furnace or a boiler.	c.	Wet scrubbing	See Section 6.1.	<p>Kindly specify the emission limits (in relation to the BAT AELs set in section 4.5) which can be achieved through the implementation of the proposed technique(s).</p>		
Technique		Description															
a.	Adsorption	See Section 6.1.															
b.	Thermal oxidation	See Section 6.1. This includes when the waste gas is sent to a process furnace or a boiler.															
c.	Wet scrubbing	See Section 6.1.															
The BAT-AEL set in Section 4.5 applies.																	
The associated monitoring is given in BAT 8.																	

4.3 BAT conclusions for the physico-chemical treatment of waste with calorific value										
4.3.1. Emissions to air										
BAT 45 In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.					Kindly specify which of the following techniques shall be applied in order to reduce emissions of organic compounds to air.					Non-applicability is noted,
Technique		Description								
a.	Adsorption	See Section 6.1								
b.	Cryogenic condensation									
c.	Thermal oxidation									
d.	Wet scrubbing									
The BAT-AEL set in Section 4.5 applies.										
The associated monitoring is given in BAT 8.										

4.4 BAT conclusions for the regeneration of spent solvents																
4.4.1. Overall environmental performance																
BAT 46 In order to improve the overall environmental performance of the regeneration of spent solvents, BAT is to use one or both of the techniques given below.			Kindly specify which of the following techniques shall be applied in order to improve the environmental performance of the regeneration of spent solvent.	Non-applicability is noted,												
<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td></td><td></td><td></td></tr></table>			Technique		Description	Applicability				<table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>a) Material recovery</td><td>N/A</td></tr><tr><td>b) Energy recovery</td><td>N/A</td></tr></table>	Technique	Yes/No	a) Material recovery	N/A	b) Energy recovery	N/A
Technique	Description	Applicability														
Technique	Yes/No															
a) Material recovery	N/A															
b) Energy recovery	N/A															

a.	Material recovery	Solvents are recovered from the distillation residues by evaporation.	Applicability may be restricted when the energy demand is excessive with regards to the quantity of solvent recovered.																																				
b.	Energy recovery	The residues from distillation are used to recover energy.	Generally applicable.																																				
4.4.2. Emissions to air																																							
BAT 47 In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use a combination of the techniques given below.				Kindly specify which of the following techniques shall be implemented in order to reduce emission of organic compounds to air.	Non-applicability is noted,																																		
<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Recirculation of process off-gases in a steam boiler</td><td>The process off-gases from the condensers are sent to the steam boiler supplying the plant.</td><td>May not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.</td></tr><tr><td>b.</td><td>Adsorption</td><td>See Section 6.1.</td><td>There may be limitations to the applicability of the technique due to safety reasons (e.g. activated carbon beds tend to self-ignite when loaded with ketones).</td></tr><tr><td>c.</td><td>Thermal oxidation</td><td>See Section 6.1.</td><td>May not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.</td></tr><tr><td>d.</td><td>Condensation or cryogenic condensation</td><td>See Section 6.1.</td><td>Generally applicable.</td></tr><tr><td>e.</td><td>Wet scrubbing</td><td>See Section 6.1.</td><td>Generally applicable.</td></tr></table>				Technique		Description	Applicability	a.	Recirculation of process off-gases in a steam boiler	The process off-gases from the condensers are sent to the steam boiler supplying the plant.	May not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.	b.	Adsorption	See Section 6.1.	There may be limitations to the applicability of the technique due to safety reasons (e.g. activated carbon beds tend to self-ignite when loaded with ketones).	c.	Thermal oxidation	See Section 6.1.	May not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.	d.	Condensation or cryogenic condensation	See Section 6.1.	Generally applicable.	e.	Wet scrubbing	See Section 6.1.	Generally applicable.	<table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>a) Recirculation of process off-gases in a steam boiler</td><td>N/A</td></tr><tr><td>b) Adsorption</td><td>N/A</td></tr><tr><td>c) Thermal oxidation</td><td>N/A</td></tr><tr><td>d) Condensation or cryogenic condensation</td><td>N/A</td></tr><tr><td>e) Wet scrubbing</td><td>N/A</td></tr></table> Kindly specify the emission limits (in relation to the BAT AELs set in section 4.5) which can be achieved through the implementation of the proposed technique(s).	Technique	Yes/No	a) Recirculation of process off-gases in a steam boiler	N/A	b) Adsorption	N/A	c) Thermal oxidation	N/A	d) Condensation or cryogenic condensation	N/A	e) Wet scrubbing
Technique	Description	Applicability																																					
a.	Recirculation of process off-gases in a steam boiler	The process off-gases from the condensers are sent to the steam boiler supplying the plant.	May not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.																																				
b.	Adsorption	See Section 6.1.	There may be limitations to the applicability of the technique due to safety reasons (e.g. activated carbon beds tend to self-ignite when loaded with ketones).																																				
c.	Thermal oxidation	See Section 6.1.	May not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.																																				
d.	Condensation or cryogenic condensation	See Section 6.1.	Generally applicable.																																				
e.	Wet scrubbing	See Section 6.1.	Generally applicable.																																				
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a) Recirculation of process off-gases in a steam boiler	N/A																																						
b) Adsorption	N/A																																						
c) Thermal oxidation	N/A																																						
d) Condensation or cryogenic condensation	N/A																																						
e) Wet scrubbing	N/A																																						
The BAT-AEL set in Section 4.5 applies.																																							
The associated monitoring is given in BAT 8.																																							

4.5 BAT-AEL for emissions of organic compounds to air from the re-refining of waste oil, the physico-chemical treatment of waste with calorific value and the regeneration of spent solvents			
Table 6.9 BAT-associated emission level (BAT-AEL) for channelled emissions of TVOC to air from the re-refining of waste oil, the physico-chemical treatment of waste with calorific value and the regeneration of spent solvents			Non-applicability is noted,
Parameter	Unit	BAT-AEL ⁽¹⁾ (Average over the sampling period)	
TVOC	Mg/Nm ³	5-30	
⁽¹⁾ The BAT-AEL does not apply when the emission load is below 2 kg/h at the emission point provided that no CMR substances are identified as relevant in the waste gas streams, based on the inventory mentioned in BAT 3.			
Kindly specify the emission limit for TVOC which can be achieved using the proposed technology.			

	N/A	

4.6 BAT conclusions for the thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil																				
4.6.1. Overall environmental performance																				
BAT 48 In order to improve the overall environmental performance of the thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil, BAT is to use all of the techniques given below.				Kindly specify how each of the following techniques is or shall be implemented in order to improve overall environmental performance.	Non-applicability is noted,															
				Technique																
				a) Heat recovery from the furnace off-gas																
				N/A																
				b) Indirectly fired furnace																
				N/A																
				c) Process-integrated techniques to reduce emissions to air																
N/A																				
<table><tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a.</td><td>Heat recovery from the furnace off-gas</td><td>Recovered heat may be used, for example, for preheating of combustion air or for the generation of steam, which is also used in the reactivation of the spent activated carbon.</td><td>Generally applicable.</td></tr><tr><td>b.</td><td>Indirectly fired furnace</td><td>An indirectly fired furnace is used to avoid contact between the contents of the furnace and the flue-gases from the burner(s).</td><td>Indirectly fired furnaces are normally constructed with a metal tube and applicability may be restricted due to corrosion problems. There may be also economic restrictions for retrofitting existing plants.</td></tr><tr><td>c.</td><td>Process-integrated techniques to reduce emissions to air</td><td>This includes techniques such as: — control of the furnace temperature and of the rotation speed of the rotary furnace; — choice of fuel; — use of a sealed furnace or operation of the furnace at a reduced pressure to avoid diffuse emissions to air.</td><td>Generally applicable.</td></tr></table>				Technique		Description	Applicability	a.	Heat recovery from the furnace off-gas	Recovered heat may be used, for example, for preheating of combustion air or for the generation of steam, which is also used in the reactivation of the spent activated carbon.	Generally applicable.	b.	Indirectly fired furnace	An indirectly fired furnace is used to avoid contact between the contents of the furnace and the flue-gases from the burner(s).	Indirectly fired furnaces are normally constructed with a metal tube and applicability may be restricted due to corrosion problems. There may be also economic restrictions for retrofitting existing plants.	c.	Process-integrated techniques to reduce emissions to air	This includes techniques such as: — control of the furnace temperature and of the rotation speed of the rotary furnace; — choice of fuel; — use of a sealed furnace or operation of the furnace at a reduced pressure to avoid diffuse emissions to air.	Generally applicable.	
Technique		Description	Applicability																	
a.	Heat recovery from the furnace off-gas	Recovered heat may be used, for example, for preheating of combustion air or for the generation of steam, which is also used in the reactivation of the spent activated carbon.	Generally applicable.																	
b.	Indirectly fired furnace	An indirectly fired furnace is used to avoid contact between the contents of the furnace and the flue-gases from the burner(s).	Indirectly fired furnaces are normally constructed with a metal tube and applicability may be restricted due to corrosion problems. There may be also economic restrictions for retrofitting existing plants.																	
c.	Process-integrated techniques to reduce emissions to air	This includes techniques such as: — control of the furnace temperature and of the rotation speed of the rotary furnace; — choice of fuel; — use of a sealed furnace or operation of the furnace at a reduced pressure to avoid diffuse emissions to air.	Generally applicable.																	
4.6.2. Emissions to air																				
BAT 49 In order to reduce emissions of HCl, HF, dust and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.				Kindly specify which technique(s) shall be implemented to reduce emissions of HCl, HF, dust and organic compounds to air.	Non-applicability is noted,															

Technique		Description
a.	Cyclone	See Section 6.1. The technique is used in combination with further abatement techniques.
b.	Electrostatic precipitator (ESP)	
c.	Fabric filter	
d.	Wet scrubbing	
e.	Adsorption	
f.	Condensation	
g.	Thermal oxidation ⁽¹⁾	
(1) Thermal oxidation is carried out with a minimum temperature of 1 100 °C and a two-second residence time for the regeneration of activated carbon used in industrial applications where refractory halogenated or other thermally resistant substances are likely to be present. In the case of activated carbon used for potable water- and food-grade applications, an afterburner with a minimum heating temperature of 850 °C and a two-second residence time is sufficient (see Section 6.1).		

Technique	Yes/No
a) Cyclone	N/A
b) Electrostatic precipitator (ESP)	N/A
c) Fabric filter	N/A
d) Wet scrubbing	N/A
e) Adsorption	N/A
f) Condensation	N/A
g) Thermal oxidation	N/A

The associated monitoring is given in BAT 8.

4.7 BAT conclusions for the water washing of excavated contaminated soil																		
4.7.1. Emissions to air																		
BAT 50 In order to reduce emissions of dust and organic compounds to air from the storage, handling, and washing steps, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.		Kindly specify which of the following techniques shall be implemented in order to reduce emissions of fust and organic compounds to air together with details of the associated monitoring in line with BAT 8.		Non-applicability is noted,														
<table><tr><th>Technique</th><th>Description</th></tr><tr><td>a) Adsorption</td><td rowspan="3">See Section 6.1.</td></tr><tr><td>b) Fabric filter</td></tr><tr><td>c) Wet scrubbing</td></tr></table>		Technique	Description		a) Adsorption	See Section 6.1.	b) Fabric filter	c) Wet scrubbing	<table><tr><th>Technique</th><th>Yes/No</th></tr><tr><td>a) Adsorption</td><td>N/A</td></tr><tr><td>b) Fabric filter</td><td>N/A</td></tr><tr><td>c) Wet scrubbing</td><td>N/A</td></tr></table>		Technique	Yes/No	a) Adsorption	N/A	b) Fabric filter	N/A	c) Wet scrubbing	N/A
Technique	Description																	
a) Adsorption	See Section 6.1.																	
b) Fabric filter																		
c) Wet scrubbing																		
Technique	Yes/No																	
a) Adsorption	N/A																	
b) Fabric filter	N/A																	
c) Wet scrubbing	N/A																	
The associated monitoring is given in BAT 8.																		

4.8 BAT conclusions for the decontamination of equipment containing PCBs					
4.8.1. Overall environmental performance					
BAT 51 In order to improve the overall environmental performance and to reduce channelled emissions of PCBs and organic compounds to air, BAT is to use all of the techniques given below.			Kindly specify how the following techniques shall be implemented in order to improve the overall environmental performance and reduce channelled emissions of PCBs and organic compounds to air? Kindly specify associated monitoring details in line with BAT 8.	Non-applicability is noted,	
Technique		Description			
a.	Coating of the storage and treatment areas	This includes techniques such as: — resin coating applied to the concrete floor of the whole storage and treatment area.			
				Technique	

b.	Implementation of staff access rules to prevent dispersion of contamination	<p>This includes techniques such as:</p> <ul style="list-style-type: none"> — access points to storage and treatment areas are locked; — special qualification is required to access the area where the contaminated equipment is stored and handled; — separate ‘clean’ and ‘dirty’ cloakrooms to put on/remove individual protective outfit. 		a) Coating of the storage and treatment areas	
				N/A	
c.	Optimised equipment cleaning and drainage	<p>This includes techniques such as:</p> <ul style="list-style-type: none"> — external surfaces of the contaminated equipment are cleaned with anionic detergent; — emptying of the equipment with a pump or under vacuum instead of gravity emptying; — procedures are defined and used for filling, emptying and (dis)connecting the vacuum vessel; — a long period of drainage (at least 12 hours) is ensured to avoid any dripping of contaminated liquid during further treatment operations, after the separation of the core from the casing of an electrical transformer. 		b) Implementation of staff access rules to prevent dispersion of contamination	
				N/A	
d.	Control and monitoring of emissions to air	<p>This includes techniques such as:</p> <ul style="list-style-type: none"> — the air of the decontamination area is collected and treated with activated carbon filters; — the exhaust of the vacuum pump mentioned in technique c. above is connected to an end-of-pipe abatement system (e.g. a high-temperature incinerator, thermal oxidation or adsorption on activated carbon); — the channelled emissions are monitored (see BAT 8); — the potential atmospheric deposition of PCBs is monitored (e.g. through physico-chemical measurements or biomonitoring). 		c) Optimized equipment cleaning and drainage	
				N/A	
e.	Disposal of waste treatment residues	<p>This includes techniques such as:</p> <ul style="list-style-type: none"> — porous, contaminated parts of the electrical transformer (wood and paper) are sent to high-temperature incineration; — PCBs in the oils are destroyed (e.g. dechlorination, hydrogenation, solvated electron processes, high-temperature incineration). 		d) Control and monitoring of emissions to air	
				N/A	
f.	Recovery of solvent when solvent washing is used	Organic solvent is collected and distilled to be reused in the process.		e) Disposal of waste	

The associated monitoring is given in BAT 8.

	treatment residues	
	N/A	
	f) Recovery of solvent when solvent washing is used	
	N/A	

5. BAT conclusions for the treatment of water-based liquid waste																											
Unless otherwise stated, the BAT conclusions presented in Section 5 apply to the treatment of water-based liquid waste, and in addition to the general BAT conclusions in Section 1.																											
5.1 Overall environmental performance																											
<p>BAT 52</p> <p>In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2).</p> <p>Description</p> <p>Monitoring the waste input, e.g. in terms of:</p> <ul style="list-style-type: none">• bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge));• feasibility of emulsion breaking, e.g. by means of laboratory-scale tests.	<p>Kindly specify what type of monitoring will be carried out for the waste input.?</p> <p>N/A</p>	Non-applicability is noted,																									
5.2 Emissions to air																											
<p>BAT 53</p> <p>In order to reduce emissions of HCl, NH3 and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given below.</p> <table><thead><tr><th>Technique</th><th>Description</th></tr></thead><tbody><tr><td>a. Adsorption</td><td rowspan="4">See Section 6.1.</td></tr><tr><td>b. Biofilter</td></tr><tr><td>c. Thermal oxidation</td></tr><tr><td>d. Wet scrubbing</td></tr></tbody></table> <p>Table 6.10 : BAT-associated emission levels (BAT-AELs) for channelled emissions of HCl and TVOC to air from the treatment of water-based liquid waste</p> <table><thead><tr><th>Parameter</th><th>Unit</th><th>BAT-AEL ⁽¹⁾ (Average over the sampling period)</th></tr></thead><tbody><tr><td>Hydrogen chloride (HCl)</td><td rowspan="2">mg/Nm³</td><td>1–5</td></tr><tr><td>TVOC</td><td>3–20 ⁽²⁾</td></tr></tbody></table> <p>(1) These BAT-AELs only apply when the substance concerned is identified as relevant in the waste gas stream, based on the inventory mentioned in BAT 3.</p> <p>(2) The upper end of the range is 45 mg/Nm³ when the emission load is below 0.5 kg/h at the emission point.</p> <p>The associated monitoring is given in BAT 8.</p>	Technique	Description	a. Adsorption	See Section 6.1.	b. Biofilter	c. Thermal oxidation	d. Wet scrubbing	Parameter	Unit	BAT-AEL ⁽¹⁾ (Average over the sampling period)	Hydrogen chloride (HCl)	mg/Nm ³	1–5	TVOC	3–20 ⁽²⁾	<p>Kindly specify which of the following technique(s) is or shall be implemented in order to reduce emissions of HCl, NH₃ and organic compounds.</p> <table><thead><tr><th>Technique</th><th>Yes/No</th></tr></thead><tbody><tr><td>a) Adsorption</td><td>N/A</td></tr><tr><td>b) Biofilter</td><td>N/A</td></tr><tr><td>c) Thermal oxidation</td><td>N/A</td></tr><tr><td>d) Wet scrubbing</td><td>N/A</td></tr></tbody></table> <p>Kindly specify the emission level for HCl and TVOC which can be achieved by the proposed technology,</p> <p>N/A</p>	Technique	Yes/No	a) Adsorption	N/A	b) Biofilter	N/A	c) Thermal oxidation	N/A	d) Wet scrubbing	N/A	
Technique	Description																										
a. Adsorption	See Section 6.1.																										
b. Biofilter																											
c. Thermal oxidation																											
d. Wet scrubbing																											
Parameter	Unit	BAT-AEL ⁽¹⁾ (Average over the sampling period)																									
Hydrogen chloride (HCl)	mg/Nm ³	1–5																									
TVOC		3–20 ⁽²⁾																									
Technique	Yes/No																										
a) Adsorption	N/A																										
b) Biofilter	N/A																										
c) Thermal oxidation	N/A																										
d) Wet scrubbing	N/A																										

Kindly refer to the following techniques in order to select the most appropriate technique for the proposed operations and associated pollutants.

6. Description of techniques		
6.1. Channelled emissions to air		
<i>Technique</i>	<i>Typical pollutant(s) abated</i>	<i>Description</i>
Adsorption	Mercury, volatile organic compounds, hydrogen sulphide, odorous compounds	Adsorption is a heterogeneous reaction in which gas molecules are retained on a solid or liquid surface that prefers specific compounds to others and thus, removes them from effluent streams. When the surface has adsorbed as much as it can, the adsorbent is replaced or the adsorbed content is desorbed as part of the regeneration of the adsorbent. When desorbed, the contaminants are usually at a higher concentration and can either be recovered or disposed of. The most common adsorbent is granular activated carbon.
Biofilter	Ammonia, hydrogen sulphide, volatile organic compounds, odorous compounds	The waste gas stream is passed through a bed of organic material (such as peat, heather, compost, root, tree bark, softwood and different combinations) or some inert material (such as clay, activated carbon, and polyurethane), where it is biologically oxidised by naturally occurring microorganisms into carbon dioxide, water, inorganic salts and biomass. A biofilter is designed considering the type(s) of waste input. An appropriate bed material, e.g. in terms of water retention capacity, bulk density, porosity, structural integrity, is selected. Also important are an appropriate height and surface area of the filter bed. The biofilter is connected to a suitable ventilation and air circulation system in order to ensure a uniform air distribution through the bed and a sufficient residence time of the waste gas inside the bed.
Condensation and cryogenic condensation	Volatile organic compounds	Condensation is a technique that eliminates solvent vapours from a waste gas stream by reducing its temperature below its dew point. For cryogenic condensation, the operating temperature can be down to -120 °C, but in practice it is often between -40 °C and -80 °C in the condensation device. Cryogenic condensation can cope with all VOCs and volatile inorganic pollutants, irrespective of their individual vapour pressures. The low temperatures applied allow for very high condensation efficiencies which make it well-suited as a final VOC emission control technique.
Cyclone	Dust	Cyclone filters are used to remove heavier particulates, which 'fall out' as the waste gases are forced into a rotating motion before they leave the separator. Cyclones are used to control particulate material, primarily PM10.
Electrostatic precipitator (ESP)	Dust	Electrostatic precipitators operate such that particles are charged and separated under the influence of an electrical field. Electrostatic precipitators are capable of operating under a wide range of conditions. In a dry ESP, the collected material is mechanically removed (e.g. by shaking, vibration, compressed air), while in a wet ESP it is flushed with a suitable liquid, usually water.
Fabric filter	Dust	Fabric filters, often referred to as bag filters, are constructed from porous woven or felted fabric through which gases are passed to remove particles. The use of a fabric filter requires the selection of a fabric suitable for the characteristics of the waste gas and the maximum operating temperature.
HEPA filter	Dust	HEPA filters (high-efficiency particle air filters) are absolute filters. The filter medium consists of paper or matted glass fibre with a high packing density. The waste gas stream is passed through the filter medium, where particulate matter is collected.
Thermal oxidation	Volatile organic compounds	The oxidation of combustible gases and odorants in a waste gas stream by heating the mixture of contaminants with air or oxygen to above its auto-ignition point in a combustion chamber and maintaining it at a high temperature long enough to complete its combustion to carbon dioxide and water.
Wet scrubbing	Dust, volatile organic compounds, gaseous acidic compounds (alkaline scrubber), gaseous alkaline compounds (acid scrubber)	The removal of gaseous or particulate pollutants from a gas stream via mass transfer to a liquid solvent, often water or an aqueous solution. It may involve a chemical reaction (e.g. in an acid or alkaline scrubber). In some cases, the compounds may be recovered from the solvent.

6.2. Diffuse emissions of organic compounds to air		
<i>Technique</i>	<i>Typical pollutant(s) abated</i>	<i>Description</i>
Leak detection and repair (LDAR) programme	Volatile organic compounds	A structured approach to reduce fugitive emissions of organic compounds by detection and subsequent repair or replacement of leaking components. Currently, sniffing (described by EN 15446) and optical gas imaging methods are available for the identification of leaks. Sniffing method: The first step is the detection using hand-held organic compound analysers measuring the concentration adjacent to the equipment (e.g. using flame ionisation or photo- ionisation). The second step consists of enclosing the component in an impermeable bag to carry out a direct measurement at the source of the emission. This second step is sometimes replaced by mathematical correlation curves derived from statistical results obtained from a large number of previous measurements made on similar components. Optical gas imaging methods: Optical imaging uses small lightweight hand-held cameras which enable the visualisation of gas leaks in real time, so that they appear as 'smoke' on a video recorder together with the normal image of the component concerned, to easily and rapidly locate significant organic compound leaks. Active systems produce an image with a back-scattered infrared laser light reflected on the component and its surroundings. Passive systems are based on the natural infrared radiation of the equipment and its surroundings.

Measurement of diffuse VOC emissions	Volatile organic compounds	<p>Solar occultation flux (SOF): The technique is based on the recording and spectrometric Fourier Transform analysis of a broadband infrared or ultraviolet/visible sunlight spectrum along a given geographical itinerary, crossing the wind direction and cutting through VOC plumes.</p> <p>Differential absorption LIDAR (DIAL): This is a laser-based technique using differential absorption LIDAR (light detection and ranging), which is the optical analogue of radio wave-based RADAR. The technique relies on the backscattering of laser beam pulses by atmospheric aerosols, and the analysis of the spectral properties of the returned light collected with a telescope.</p>
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6.3 Emissions to water		
<i>Technique</i>	<i>Typical pollutant(s) targeted</i>	<i>Description</i>
Activated sludge process	Biodegradable organic compounds	The biological oxidation of dissolved organic pollutants with oxygen using the metabolism of microorganisms. In the presence of dissolved oxygen (injected as air or pure oxygen), the organic components are transformed into carbon dioxide, water or other metabolites and biomass (i.e. the activated sludge). The microorganisms are maintained in suspension in the waste water and the whole mixture is mechanically aerated. The activated sludge mixture is sent to a separation facility from where the sludge is recycled to the aeration tank.
Adsorption	Adsorbable dissolved non-biodegradable or inhibitory pollutants, e.g. hydrocarbons, mercury, AOX	Separation method in which compounds (i.e. pollutants) in a fluid (i.e. waste water) are retained on a solid surface (typically activated carbon).
Chemical oxidation	Oxidisable dissolved non-biodegradable or inhibitory pollutants, e.g. nitrite, cyanide	Organic compounds are oxidised to less harmful and more easily biodegradable compounds. Techniques include wet oxidation or oxidation with ozone or hydrogen peroxide, optionally supported by catalysts or UV radiation. Chemical oxidation is also used to degrade organic compounds causing odour, taste and colour and for disinfection purposes.
Chemical reduction	Reducible dissolved non-biodegradable or inhibitory pollutants, e.g. hexavalent chromium (Cr(VI))	Chemical reduction is the conversion of pollutants by chemical reducing agents into similar but less harmful or hazardous compounds.
Coagulation and flocculation	Suspended solids and particulate-bound metals	Coagulation and flocculation are used to separate suspended solids from waste water and are often carried out in successive steps. Coagulation is carried out by adding coagulants with charges opposite to those of the suspended solids. Flocculation is carried out by adding polymers, so that collisions of microfloc particles cause them to bond to produce larger flocs. The flocs formed are subsequently separated by sedimentation, air flotation or filtration.
Distillation/rectification	Dissolved non-biodegradable or inhibitory pollutants that can be distilled, e.g. some solvents	Distillation is a technique to separate compounds with different boiling points by partial evaporation and recondensation. Waste water distillation is the removal of low-boiling contaminants from waste water by transferring them into the vapour phase. Distillation is carried out in columns, equipped with plates or packing material, and a downstream condenser.
Equalisation	All pollutants	Balancing of flows and pollutant loads by using tanks or other management techniques.
Evaporation	Soluble pollutants	The use of distillation (see above) to concentrate aqueous solutions of high-boiling substances for further use, processing or disposal (e.g. waste water incineration) by transferring water to the vapour phase. It is typically carried out in multistage units with increasing vacuum, to reduce the energy demand. The water vapours are condensed, to be reused or discharged as waste water.
Filtration	Suspended solids and particulate-bound metals	The separation of solids from waste water by passing them through a porous medium, e.g. sand filtration, microfiltration and ultrafiltration.
Flotation		The separation of solid or liquid particles from waste water by attaching them to fine gas bubbles, usually air. The buoyant particles accumulate at the water surface and are collected with skimmers.
Ion exchange	Ionic dissolved non-biodegradable or inhibitory pollutants, e.g. metals	The retention of undesired or hazardous ionic constituents of waste water and their replacement by more acceptable ions using an ion exchange resin. The pollutants are temporarily retained and afterwards released into a regeneration or backwashing liquid.
Membrane bioreactor	Biodegradable organic compounds	A combination of activated sludge treatment and membrane filtration. Two variants are used: a) an external recirculation loop between the activated sludge tank and the membrane module; and b) immersion of the membrane module in the aerated activated sludge tank, where the effluent is filtered through a hollow fibre membrane, the biomass remaining in the tank.

Membrane filtration	Suspended solids and particulate-bound metals	Microfiltration (MF) and ultrafiltration (UF) are membrane filtration processes that retain and concentrate, on one side of the membrane, pollutants such as suspended particles and colloidal particles contained in waste waters.
Neutralization	Acids, alkalis	The adjustment of the pH of waste water to a neutral level (approximately 7) by the addition of chemicals. Sodium hydroxide (NaOH) or calcium hydroxide (Ca(OH) ₂) may be used to increase the pH, whereas sulphuric acid (H ₂ SO ₄), hydrochloric acid (HCl) or carbon dioxide (CO ₂) may be used to decrease the pH. The precipitation of some pollutants may occur during neutralisation.
Nitrification/denitrification	Total nitrogen, ammonia	A two-step process that is typically incorporated into biological waste water treatment plants. The first step is aerobic nitrification where microorganisms oxidise ammonium (NH ₄ ⁺) to the intermediate nitrite (NO ₂ ⁻), which is then further oxidised to nitrate (NO ₃ ⁻). In the subsequent anoxic denitrification step, microorganisms chemically reduce nitrate to nitrogen gas.
Oil-water separation	Oil/grease	The separation of oil and water and subsequent oil removal by gravity separation of free oil, using separation equipment or emulsion breaking (using emulsion breaking chemicals such as metal salts, mineral acids, adsorbents and organic polymers).
Sedimentation	Suspended solids and particulate-bound metals	The separation of suspended particles by gravitational settling.
Precipitation	Precipitable dissolved non-biodegradable or inhibitory pollutants, e.g. metals, phosphorus	The conversion of dissolved pollutants into insoluble compounds by adding precipitants. The solid precipitates formed are subsequently separated by sedimentation, air flotation or filtration.
Stripping	Purgeable pollutants, e.g. hydrogen sulphide (H ₂ S), ammonia (NH ₃), some adsorbable organically bound halogens (AOX), hydrocarbons	The removal of purgeable pollutants from the aqueous phase by a gaseous phase (e.g. steam, nitrogen or air) that is passed through the liquid. They are subsequently recovered (e.g. by condensation) for further use or disposal. The removal efficiency may be enhanced by increasing the temperature or reducing the pressure.

6.4 Sorting Techniques		
Air classification	Air classification (or air separation, or aeraulic separation) is a process of approximate sizing of dry mixtures of different particle sizes into groups or grades at cut points ranging from 10 mesh to sub-mesh sizes. Air classifiers (also called windsifters) complement screens in applications requiring cut points below commercial screen sizes, and supplement sieves and screens for coarser cuts where the special advantages of air classification warrant it.	
All-metal separator	Metals (ferrous and non-ferrous) are sorted by means of a detection coil, in which the magnetic field is influenced by metal particles, linked to a processor that controls the air jet for ejecting the materials that have been detected.	
Electromagnetic separation of non-ferrous metals	Non-ferrous metals are sorted by means of eddy current separators. An eddy current is induced by a series of rare earth magnetic or ceramic rotors at the head of a conveyor that spins at high speed independently of the conveyor. This process induces temporary magnetic forces in non-magnetic metals of the same polarity as the rotor, causing the metals to be repelled away and then separated from the other feedstock.	
Manual separation	Material is manually separated by means of visual examination by staff on a picking line or on the floor, either to selectively remove a target material from a general waste stream or to remove contamination from an output stream to increase purity. This technique generally targets recyclables (glass, plastic, etc.) and any contaminants, hazardous materials and oversized materials such as WEEE.	
Magnetic separation	Ferrous metals are sorted by means of a magnet which attracts ferrous metal materials. This can be carried out, for example, by an overband magnetic separator or a magnetic drum.	
Near-infrared spectroscopy (NIRS)	Materials are sorted by means of a near-infrared sensor which scans the whole width of the belt conveyor and transmits the characteristic spectra of the different materials to a data processor which controls an air jet for ejecting the materials that have been detected. Generally NIRS is not suitable for sorting black materials.	
Sink-float tanks	Solid materials are separated into two flows by exploiting the different material densities.	
Size separation	Materials are sorted according to their particle size. This can be carried out by drum screens, linear and circular oscillating screens, flip-flop screens, flat screens, tumbler screens and moving grates.	
Vibration table	Materials are separated according to their density and size, moving (in slurry in the case of wet tables or wet density separators) across an inclined table, which oscillates backwards and forwards.	
X-ray systems	Material composites are sorted according to various material densities, halogen components, or organic components, with the aid of X-rays. The characteristics of the different materials are transmitted to a data processor which controls an air jet for ejecting the materials that have been detected.	

6.5 Management techniques	
Accident management plan	The accident management plan is part of the EMS (see BAT 1) and identifies hazards posed by the plant and the associated risks and defines measures to address these risks. It considers the inventory of pollutants present or likely to be present which could have environmental consequences if they escape.
Residues management plan	A residues management plan is part of the EMS (see BAT 1) and is a set of measures aiming to 1) minimise the generation of residues arising from the treatment of waste, 2) optimise the reuse, regeneration, recycling and/or recovery of energy of the residues, and 3) ensure the proper disposal of residues.