

Comment from (name of organisation / MS)	Reference				Comment description	Proposal for modification	Rationale / supporting data	EIPPCB assessment
	Comment #	Section No.	BAT No.	Technique letter				
Finland	1	Scope			The daily capacity has to be defined.	Definition in the following table.	It isn't clear is that an average or maximum capacity per day. Using an average, what is the divisor (work days or yearly days?)?	
Finland	2	Scope		5,3	What is the reason, that pure AD-treatment has a higher capacity limit?	Deletion of the sentence	The environmental risk from a AD-plant is not lower than from other waste treatment plants.	Neither biological treatment nor PCT is defined in the BATC. It is not the role of the BATC to give interpretation of activities listed in Annex I of IED.
Finland	3	6.1.2			In the headline is mentioned the emission <u>to water</u> , which has to be understood as direct discharge to water in the environment and finally a receiving water body. For that reason footnote (6) for the following table is not necessary.	Deletion of footnote (6)	Unnecessary footnote	We are not sure to understand the comment. It seems to relate to different issues.
ESWET	4	Definitions	definitions	APC	p.6/65 of BAT-C, Acronyms definitions: "APC: Air Pollution Control" The WI BREF TWG agreed not to use this very negative wording.	Replace everywhere "APC" and "Air Pollution Control" by "FGC" and "Flue Gas Cleaning".	This devices donot "control pollution". They clean gases from the pollutants which come from waste.	OK. In fact, no acronym is used at all.

Finland	4	6.3.1.2	32	Table 6.8	The limit value for the odour concentration is not realistic. Even with this BAT described measures, they can't be reached.	limit value 3 000 ou/m3	Used in Finnish environmental permits	We are not sure to understand the comment. It seems to relate to different issues.
Finland	5	6.3.2.1	34		The tight monitoring of the process should be limited to the main emission phase, which is the intensive composting.	Additional sentence, which limits the demands to the intensive composting phase.	Emissions are much lower during the maturation phase.	We are not sure to understand the comment. It seems to relate to different issues.
Finland	6	6.3.2.2	34 bis		The technical demands should be limited to the main emission phase, which is the intensive composting.	Additional sentence, which limits the demands to the intensive composting phase.	Emissions are much lower during the maturation phase.	We are not sure to understand the comment. It seems to relate to different issues.