Overall comment No.	Chapter No. / section No.							Chapter title	Page No. (PDF version of final draft)	Comment description	Proposal for modification	Rationale
1								Whole document		The CWW BREF covers a large variety of activities either in stande-alone plants or larger conglomerates of plants (all activities specified in Sections 4 and 6.11 of Annex I to IED). However, the interface of the CWW BREF with the other chemical BREFs was unclear until the final TWG Meeting as the only orientation provided was the statement that BATs from ´vertical´ and ´horizontal´BREFs should not result in conflicting conclusions (see also discussions in the IED Art. 13 forum, at 12 Septemeber 2012, and wording in the BREF Guidance, Section 1.1.2). During the final TWG meeting of the CWW BREF in December 2013, DG ENV confirmed in its presentation that the TWG should aim for non-conflicting conclusions between 'vertical' and 'horizontal' BREFs. However, if there are conclusions on the same issue in CWW as well as in a "vertical" chemical BREF, the more specific BREF shall apply (lex generalis vs. lex specialis). To avoid leading this discussion again, and for the future work in the revision of the chemical BREFs, a quotable decision regulating the applicability/relationship of BAT conclusions in the CWW BREF in relation to the other chemical BREFs is necessary.	We ask the COM to give a clear statement regarding the relationship of the CWW BREF with other BREFS of the chemicals sector, in particular concerning the permt review.	According to the BREF guidance document 2012/119/EU, 'horizontal' (i.e. CWW BREF) and 'vertical' BREFs (i.e. other chemical BREFs such as the POL, LVOC, LVIC, etc) should be complementary for setting permit conditions (no conflicting conclusions between 'vertical' and 'horizontal BREFs). However, this statement is not clear enough in a number of possible cases. Together with the recent statement of DG ENV during the final TWG on this issue, it is. We refer to article 21.3 of the Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions, which states that all permit conditions are reconsidered and, if necessary, updated within 4 years of publication of decisions on BAT conclusions in accordance with Article 13(5) relating to the main activity of an installation.
2	3	3	2	3	2				184	Total Suspended Solids: Table 3.9 provides achievable emissions levels for sedimentation of solids, however, the UK has noted a number of anomalies. The abatement efficiency for total suspended solids (60-99%) is higher than the abatement efficiency achievable for settleable solids (90-95%). This should never be the case and the data need to be checked to ensure they are accurate and appropriate. Additionally, with the abatement efficiencies and BAT-AEL quoted, the higher the solids loading to the WWTP, the more settleable the solids need to be to enable compliance with the proposed BAT-AEL range. This is almost perverse as in general, if the solids are indeed settleable, the operator is likely to recover at source, hence the load would not be high to the WWTP. This data needs to be checked and corrected and the potential consequences for the BAT-AEL range proposed for TSS (5-35 mg/l) fully considered.	Reinstate the value for the abatement efficiency of TSS of 60-90 % from the original CWW BREF. This value would be compatible with the given value for the settleable solids.	
3	3	3	2	3	2	3			190	Capital cost data: As stated in comment 1 in May 2014, unfortunately the UK was unable to provide detailed comments on Chapters 3, 5, and 6 in the time provided. Some further review of those chapters has now been possible. With regard Table 3.18, it is noted some costs are quoted in DEM with the reference quoted as dating from 1999, and similarly, Tables 3.19 (un-referenced) and 3.30 (reference dated 1997) quote costs in GBP. The UK is concerned that the capital and operating costs quoted are therefore considerable out of date and not standardised to one currency. These comments probably apply to other tables etc.	Many cost figures have already been converted (in line with Commission Implementing Decision 2012/119/EU). The BREF should be checked again to ensure that all cost figures are also given in EUR.	The BRef has to be usable by permit writers and operators in all 28 MSs. Cost information may be used to justify a design as BAT, and therefore only accurate data should be included in the BRef.
4	3	5	1	2	3	4			395	Table 3.194: "Toxic and high concentrations of acidifying substances must be prevented"	Reformulate the sentence to: 'High concentrations of toxic and acidifying substances should be prevented.'	It will depend on the concentration of these substances. Concentrations below toxic levels are acceptable.
5	4	1							551	BAT 1. Referering to BAT 13 waste management plan always is a part af the environmental management system. This should be clarified in BAT 1.	BAT 1. Add the following text after XI: In all cases, the following feature is part of the EMS: XII. Waste management plan (see BAT 13) (Change the following numbering)	We find it necessary to include "waste management plan" as a part of BAT 1 with reference to BAT 13 as done for odour and noise.
6	4	2							554	BAT 5: monitoring of diffuse VOC emissions Need to clarify that not all techniques for the reduction of diffuse VOC emissions in the chemical sector have always to be used simultaneously.	Reword BAT 5 as follows: BAT 5. BAT is to periodically monitor diffuse VOC emissions to air from relevant sources by using ~~all~~ **an appropriate combination** of the techniques **I-III** ~~given below~~**, or, where large amounts of VOCs are handled, all of the techniques I-III.** I. sniffing methods (…); II. optical gas imaging techniques; III. calculation of emissions based on emission factors, periodically validated by measurements (e.g. once every two years). ~~For installations where large amounts of VOCs are handled, the three techniques are complementary.~~ **Where large amounts of VOCs are handled, t**he screening and quantification of emissions from the installation by periodic campaigns with optical absorption-based techniques, such as Differential absorption light detection and ranging (DIAL) or Solar occultation flux (SOF), is a useful complementary technique to the techniques I to III. **Description** See Section 4.6.2 ~~Applicability~~ ~~The applicability might be restricted depending on the nature, scale and complexity of the installation.~~	
7	4	3	4						559	Table 4.3, BAT-AEL for Zn: Add a footnote indicating an applicability restriction for waste waters originating from the production of viscose fibres.	Add footnote: "The BAT-AEL for Zn may not apply when the main pollutant load originates from the production of viscose fibers'.	Use of zinc in coagulation step for production of viscose fibres