SEPA
Position statement

Pre-treatment of Waste Prior to Incineration or Co- Incineration

Background

The Industrial Emissions Directive (IED) has extended the scope of the integrated pollution prevention and control regime to cover several new activities, including the pre-treatment of waste for incineration or co-incineration (referred to collectively in this position as (co)incineration). Installations carrying on such activities require an integrated environmental permit where the capacity of such pre-treatment is >75 tonnes/day for an activity for recovery or a mix of recovery and disposal, or > 50 tonnes/day for a disposal activity[1]. The IED is implemented in Scotland through the Pollution Prevention and Control (Scotland) Regulations 2012 (PPC2012).

However the IED provides no definition of 'pre-treatment', nor has the European Commission provided clarification. This position statement clarifies SEPA's interpretation of what constitutes "pre-treatment of waste prior to (co)incineration" for the purposes of the IED and PPC2012.

A study carried out on behalf of the Commission that provided the basis for extending the scope of the previous IPPC Directive[2] identified 5 "key parameters" that determine the quality of waste fuel. These are:-

- Calorific (or heating) value;
- Moisture content;
- Ash content;
- Chemical composition;
- Heavy metal content.

SEPA's position on the interpretation of "pre-treatment of waste prior to (co)incineration".

Only those treatments that directly and intentionally, rather than incidentally, change the nature of the waste in a way that improves its quality as a fuel would qualify as the pre-treatment of waste for (co)incineration. This would essentially require the intentional pursuit of a change in any of the 5 key parameters identified above that improves its quality as a fuel.

Activities that prepare the waste for transportation, such as size reduction (shredding) or bailing; or activities that may assist in the handling of the fuel, but are not primarily aimed at improving its combustion characteristics, would not be considered pre-treatment prior to (co)incineration.

The following would therefore be examples of pre-treatment for the purposes of (co)incineration:

a) Drying and/or pelletizing the residual waste from a materials recycling facility or the sludge from an effluent treatment plant explicitly in order to reduce its moisture content so as to facilitate its combustion

b) Separation processes specifically to reduce the chlorine, heavy metals or ash content of waste prior to combustion where that is done in order to improve the fuel quality

The following would not be deemed pre-treatment prior to (co)incineration:

[1] Section 5.4, Part A(1) a(iii) and b(ii) of the Pollution Prevention and Control (Scotland) Regulations 2012.
[2] Data gathering and impact assessment for a review and possible widening of the scope of the IPPC Directive in relation to waste treatment activities.

c) removal of recyclable material from a mixed waste stream or separation of mixed dry recyclable material (including using an initial size reduction step) where some or all of the remaining material eventually ends up as fuel in an energy from waste plant but there is no further refining of the waste on site;

d) the removal and shredding of oversize material from a composting process which is subsequently sent for use as biomass (where the shredding is to facilitate handling)

While the term 'intention' is used in this position, the SEPA position is restricted as far as possible to physical activities such as those described above rather than any other "marketing strategy" used by the operator.

Limitations

This statement applies only in Scotland. The terms of this statement may be subject to periodic review and may be changed or withdrawn in light of technological developments, regulatory or legislative changes, future government guidance or experience of its use. SEPA reserves its discretion to depart from the position outlined in this statement and to take appropriate action to avoid any risk of pollution or harm to human health or the environment.