

Use of Incinerator Bottom Ash Aggregate

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This position statement applies if you manufacture Incinerator Bottom Ash Aggregate (IBAA) from municipal Incinerator Bottom Ash (IBA) or use it as an unbound aggregate in construction.

IBAA is a 'waste' but if you comply with the conditions of this Position Statement, you do not normally need to apply for a Waste Management Licence or Exemption to use IBAA in the specified construction activities.

Other uses, such as pipe bedding, may be authorised by SEPA on a case by case basis, usually under a Paragraph 19 Exemption from Waste Management Licensing, subject to a site specific risk assessment.

For clarity, this statement does not apply to Air Pollution Control residues (APCr).

Conditions that apply

- The IBAA may only be used in the following applications; sub-base or general fill in roads or construction platforms where the IBAA is covered with a low permeability surface or buildings.
- The IBAA must only be manufactured from non-hazardous IBA. Classification is determined using a combination of "Guidance on the classification and assessment of waste – WM3"¹ and the "ESA Sampling and Testing Protocol to assess the status of incinerator bottom ash – Jan 2018"².
- The IBAA must be manufactured in accordance with the relevant aggregates standards and specifications.
- The total area of IBAA placement in any single project must be less than 5000m² with an average thickness of less than 1m.
- The IBAA must not be placed directly into groundwater or within 1m of the water table.
- The IBAA must not be stored or used within 50 metres of surface water.
- The IBAA must not be stored at the place of final use for longer than 6 months.
- Suppliers and users of IBAA must keep records of the following information and make them available for inspection by SEPA on request;
 - Name and location of the project to which IBAA has been supplied / used
 - Date of supply / use
 - Quantity of IBAA supplied / use

¹ <https://www.sepa.org.uk/media/361865/waste-classification-technical-guidance-wm3.pdf>

² http://www.esauk.org/application/files/7915/3589/6448/20180130_IBA_Protocol_revised_-_Jan_2018_version.pdf

- Suppliers must provide to each user a statement that the material meets the relevant standard for an end use specified in this position statement and has been supplied only for that use.
- Where IBAA is identified as part of excavations, it is to be stored and managed separately from other excavation wastes. Any further use must either be in accordance with this position statement or in accordance with waste management licencing legislation.

Future Work

SEPA is committed to working with the waste management and construction industries to further explore uses of IBAA to improve market access and maintain environmental protection. These options may include;

- Washing processes to improve environmental performance of granular unbound IBAA
- Blending unbound IBAA with primary aggregate
- Use of IBAA in bound applications (i.e. concretes & grouts)

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