

## Sewage sludge ashes for P-recovery purposes in The Netherlands



## **Sewage sludge ashes for P-recovery purposes in The Netherlands**

*RECOVER*

### **Phosphorus**

From sewage sludge  
ashes

*MONITOR*

### **Sewage sludge ashes**

Quality

*IDENTIFY*

### **Potentials**

In the Netherlands

This report was prepared by the partners HVC and SNB of the Phos4You project, funded through INTERREG VB North-West Europe programme (2014-2021).

# Sewage sludge ashes for P-recovery purposes in The Netherlands



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## Contents

|                                                                            |           |
|----------------------------------------------------------------------------|-----------|
| <b>Sewage sludge ashes for P-recovery purposes in The Netherlands.....</b> | <b>3</b>  |
| <b>1. Introduction to sewage sludge management .....</b>                   | <b>6</b>  |
| 1.1 The Netherlands .....                                                  | 6         |
| 1.2 The incineration process .....                                         | 6         |
| <b>2. Quality of sewage sludge .....</b>                                   | <b>8</b>  |
| 2.1 Sewage sludge quality HVC.....                                         | 8         |
| <b>3. Sewage sludge ashes .....</b>                                        | <b>10</b> |
| 3.1 General overview.....                                                  | 10        |
| 3.2 Detailed trends in ashes .....                                         | 12        |
| 3.2.1 Phosphate.....                                                       | 13        |
| 3.2.2 Arsenic.....                                                         | 14        |
| 3.2.3 Cadmium .....                                                        | 14        |
| 3.2.4 Calcium.....                                                         | 15        |
| 3.2.5 Aluminum .....                                                       | 15        |
| 3.2.6 Iron .....                                                           | 16        |
| <b>4. SSA: waste or end-of-waste and its implications.....</b>             | <b>17</b> |
| <b>Appendices .....</b>                                                    | <b>19</b> |
| Appendix I: Sewage sludge ash analyses .....                               | 19        |
| Appendix II: Elements in ash.....                                          | 20        |
| <b>References .....</b>                                                    | <b>31</b> |

## List of figures

|                                                                                                                      |    |
|----------------------------------------------------------------------------------------------------------------------|----|
| Figure 1: The sludge incineration process (source: SNB). .....                                                       | 6  |
| Figure 2: Reduction of Cd and Hg in sludge HVC (source: Milieujaarverslag HVC, 2020). .....                          | 9  |
| Figure 3: Heavy metals in sludge HVC (source: Milieujaarverslag HVC, 2020) .....                                     | 10 |
| Figure 4: Ton input and output at HVC and SNB (source: Milieujaarverslag HVC and milieujaarverslag SNB, 2020). ..... | 12 |
| Figure 5: Phosphate in ash (source: own illustration based on weekly sampling program) .....                         | 13 |
| Figure 6: Arsenic in ash (source: own illustration based on weekly sampling program) .....                           | 14 |
| Figure 7: Cadmium in ash (source: own illustration based on weekly sampling program) .....                           | 14 |
| Figure 8: Calcium in ash (source: own illustration based on weekly sampling program) .....                           | 15 |
| Figure 9: Aluminum in ash (source: own illustration based on weekly sampling program) .....                          | 15 |
| Figure 10: Iron in ash (source: own illustration based on weekly sampling program) .....                             | 16 |
| Figure 11: Procedure end of waste .....                                                                              | 18 |

## List of tables

|                                                                                                          |    |
|----------------------------------------------------------------------------------------------------------|----|
| Table 1: Condensate concentrations (source: own tests by HVC) .....                                      | 7  |
| Table 2: Sludge composition HVC (source: Milieujaarverslag HVC, 2020) .....                              | 8  |
| Table 3: Sludge composition SNB (source: Milieujaarverslag SNB, 2020).....                               | 9  |
| Table 4: Sludge and SSA HVC and SNB (source: Milieujaarverslag HVC and Milieujaarverslag SNB, 2020)..... | 11 |

# 1. Introduction to sewage sludge management

## 1.1 The Netherlands

The Dutch water authorities possess two sludge incineration facilities in which about 700.000 tons of wet sludge is incinerated. The other approximately 700.000 tons of wet sludge are separated, dried and co-incinerated in waste to energy plant or composted and co-incinerated either in The Netherlands or in surrounding countries. HVC and SNB are the owners and operators of the 2 incineration plants in Dordrecht (province of Zuid Holland) and Moerdijk (province of Brabant) since the early 1990's.

Since the "BOOM-besluit" in year 1998 (<https://wetten.overheid.nl/BWBR0009360/2006-01-010>) it became impossible in The Netherlands to spread sewage sludge on agricultural land. At that time mainly heavy metals like copper and zinc were the limiting factors for this. Nowadays the concerns about micro plastics and organic contaminants play a relevant role in emphasizing that sewage sludge contains a lot of pollutants. In the LAP3 (Dutch National Waste plan) it is stated that sewage sludge needs to be thermally treated. Other treatment is possible if proven at least equivalent (in term of eliminating contaminants) to thermal treatment.

HVC sewage sludge mono-incinerator is currently in operation for more than 25 years, while that of SNB is approaching the same age. These 25 years of state of the art incineration has delivered the Dutch water and sludge sector a lot of experience and insight in the changing qualities of sludge and sludge incineration ashes.

## 1.2 The incineration process

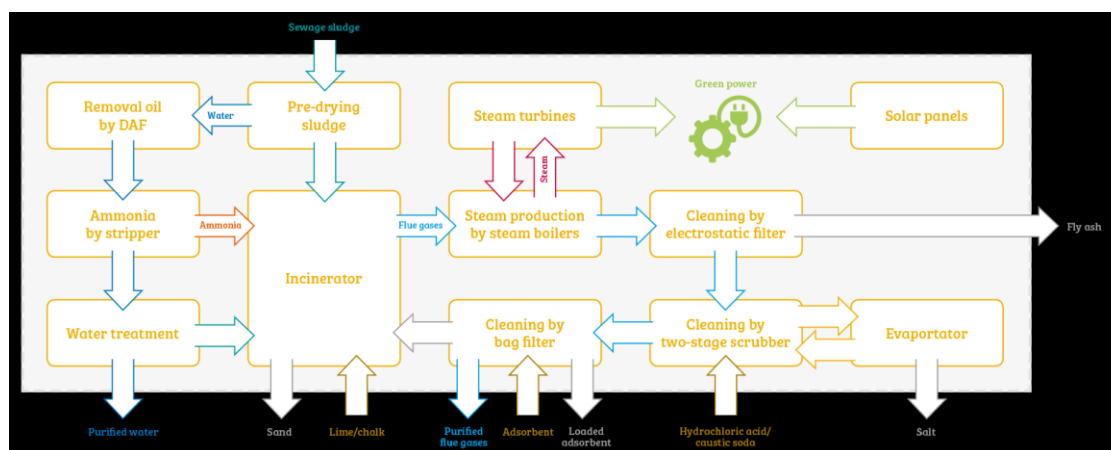


Figure 1: The sludge incineration process (source: SNB).

The main difference between the HVC and SNB process influencing the quality of the ashes, is the dosing of  $\text{CaCO}_3$  in the furnaces of SNB, aiming to reduce Sulfur in the flue gasses and reducing the capital investment of the scrubbers (which can be smaller). Approximately 25% of the ash of SNB consist of  $\text{CaCO}_3$  and  $\text{CaSO}_4$ . Assuming this all origins from direct Sulfur abatement the ashes are diluted with a factor of approximately 1,35.

SNB possesses an own treatment installation for the condensate from the drying process. In the treatment process, ammonia is recovered and is being used in the denox installation of the incinerator. After stripping the waste water is treated in a biological waste water treatment plant reducing COD and nitrogen. HVC discharges the condensate, currently without pre-treatment, to the neighboring WWTP.

As with increasing sludge digestion on the WWTP's of the water authorities, it appears that a slightly higher N content in the sludge is produced. Moreover this N is probably more available as  $\text{NH}_3$  as it is more removed in the sludge dryers . As a consequence the  $\text{N}_{\text{Kjeldahl}}$  contents in the condensate from the drying step is rising significantly. In 2020 HVC did a small test to separate digested an undigested sludge and incinerate it in separate lines.

COD and  $\text{N}_{\text{Kj}}$  values in the condensate from the different lines is clearly distinguished:

| Measurement in condensate | unit | Undigested sewage sludge | Digested sewage sludge |
|---------------------------|------|--------------------------|------------------------|
| pH                        |      | 8,5                      | 9,5                    |
| COD                       | mg/l | 7000                     | 3800                   |
| $\text{N}_{\text{Kj}}$    | mg/l | 1000                     | 4800                   |

**Table 1: Condensate concentrations (source: own tests by HVC)**

Additional increase of digested sludge will lead to a higher risk on  $\text{NO}_x$  or  $\text{NH}_3$  air emissions and increase of N in the drying condensate will need an increase of the N removal capacity of the receiving biological waste water treatment.

Further research is therefore done in other to find the technical possibilities for N-recovery at the HVC and SNB-plant and the most optimal configuration in cooperation with the water authorities.

## 2. Quality of sewage sludge

### 2.1 Sewage sludge quality HVC

The average yearly sewage sludge quality supplied in the last 10 years to the incineration plants of HVC and SNB is given in the tables. Variation in copper, zinc and lead is seen and they all approach or surpass the thresholds of the Meststoffenbesluit (Dutch Fertiliser Regulation). Also the mentioned increase of nitrogen content is clearly seen in the figures of SNB (no data on N available of HVC).

|                                      | ds   | org. stof | Cu                               | Cr | Zn    | Pb  | Cd    | Ni   | Hg    | As   | Sb    | Mo   | pH  |
|--------------------------------------|------|-----------|----------------------------------|----|-------|-----|-------|------|-------|------|-------|------|-----|
|                                      | %    | %         | concentratie in mg/kg droge stof |    |       |     |       |      |       |      |       |      | --  |
| 1992: cijfers uit 2 <sup>e</sup> MER | 19,6 | 63        | 460                              | 40 | 1.230 | 265 | 3,6   | 25   | 2,4   | 11   | --    | --   | --  |
| 1994                                 | 20,0 | 61        | 470                              | 35 | 1.200 | 285 | 2,9   | 29   | 2,0   | 12   | --    | --   | --  |
| 1996                                 | 21,9 | 59        | 340                              | 47 | 800   | 145 | 2,3   | 27   | 1,6   | 10   | 4,1   | 6,1  | --  |
| 1998                                 | 22,7 | 60        | 370                              | 32 | 910   | 170 | 1,9   | 29   | 1,4   | 13   | 2,0   | 7,0  | 7,5 |
| 2000                                 | 22,4 | 64        | 380                              | 33 | 940   | 170 | < 1,8 | < 31 | < 1,4 | < 12 | < 3,2 | < 8  | 7,3 |
| 2002                                 | 22,5 | 64        | 365                              | 30 | 940   | 160 | < 1,7 | < 28 | < 1,2 | < 13 | < 9,7 | < 14 | 7,3 |
| 2004                                 | 22,9 | 65,6      | 370                              | 33 | 980   | 155 | < 1,7 | < 28 | < 1,2 | < 12 | < 4   | < 11 | 6,9 |
| 2006                                 | 22,6 | 65,3      | 350                              | 30 | 880   | 130 | < 1,4 | 23   | < 0,9 | < 12 | < 4   | < 9  | 7,1 |
| 2008                                 | 21,8 | 67,7      | 350                              | 28 | 905   | 130 | < 1,1 | 23   | < 0,8 | < 14 | < 3   | < 8  | 7,1 |
| 2010                                 | 22,0 | 68,6      | 370                              | 35 | 1.005 | 150 | < 1,2 | 27   | < 0,8 | < 13 | < 4   | < 9  | 7,0 |
| 2012                                 | 22,0 | 69,1      | 365                              | 39 | 970   | 130 | < 1,2 | 29   | < 0,7 | 15   | < 4   | < 9  | 7,3 |
| 2014                                 | 22,2 | 69,5      | 400                              | 44 | 970   | 120 | < 1,1 | 25   | < 0,7 | 15   | < 4   | 10   | 7,4 |
| 2016                                 | 21,9 | 70,7      | 380                              | 40 | 970   | 125 | 1,1   | 26   | 0,6   | 16,2 | 4     | 10   | 7,3 |
| 2017                                 | 21,7 | 72,1      | 380                              | 31 | 930   | 100 | 0,9   | 22   | 0,6   | 14,3 | 4     | 10   | 7,3 |
| 2018                                 | 21,7 | 72,2      | 380                              | 33 | 940   | 100 | 0,9   | 22   | 0,6   | 15,4 | 4     | 9    | 7,3 |
| 2019 naar SVI                        | 21,9 | 72,7      | 380                              | 38 | 930   | 90  | 0,9   | 23   | 0,5   | 13,5 | 4     | 10   | 7,4 |
| 2020 naar SVI                        | 22,2 | 71,9      | 375                              | 33 | 960   | 96  | 0,9   | 23   | 0,5   | 15   | 3     | 10   | 7,5 |
| Uitvoeringsbesluit Meststoffenwet    | --   | --        | 75                               | 75 | 300   | 100 | 1,25  | 30   | 0,75  | 15   | --    | --   | --  |

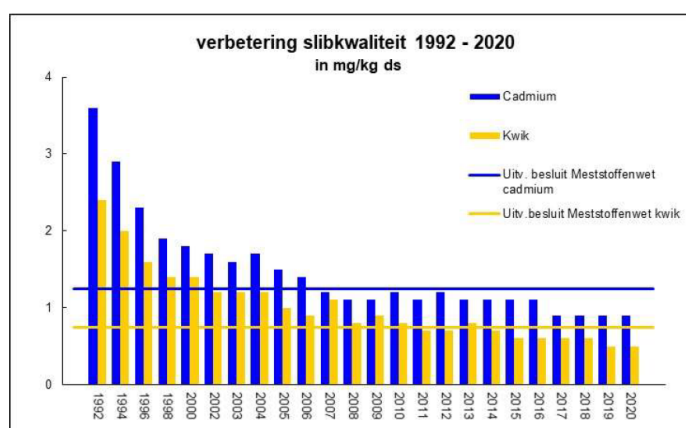
Table 2: Sludge composition HVC (source: Milieujaarverslag HVC, 2020)

| Composition sludge received by SNB |              |                |          |     |    |     |     |    |       |     |        |       |      |      |         |
|------------------------------------|--------------|----------------|----------|-----|----|-----|-----|----|-------|-----|--------|-------|------|------|---------|
|                                    | Dry matter   | organic matter | As       | Cd  | Cr | Cu  | Pb  | Ni | Zn    | Hg  | S      | Cl    | EOX  | PAK  | N-Kj    |
|                                    | %sludge cake | % dm           | mg/kg dm |     |    |     |     |    |       |     |        |       |      |      | g/kg dm |
| 2021                               | 22,3         | 69,4           | 9,1      | 1,2 | 42 | 426 | 81  | 27 | 1.241 | 0,4 | 10.748 | 2.741 | 10,3 | 4,2  | 60,7    |
| 2020                               | 22,7         | 69,2           | 8,0      | 1,2 | 44 | 418 | 80  | 26 | 1.077 | 0,4 | 12.245 | 2.564 | 10,1 | 3,8  | 57,9    |
| 2019                               | 22,3         | 68,3           | 9,7      | 1,2 | 48 | 419 | 91  | 28 | 1.135 | 0,5 | 12.517 | 2.667 | 11,2 | 4,9  | 57,9    |
| 2018                               | 23,2         | 69,2           | 8,7      | 1,1 | 45 | 375 | 76  | 28 | 934   | 0,5 | 10.966 | 1.816 | 12,9 | 5,5  | 56,6    |
| 2017                               | 23,1         | 70,0           | 8,3      | 1,0 | 47 | 356 | 78  | 28 | 890   | 0,5 | 10.356 | 2.592 | 12,7 | 4,1  | 56,1    |
| 2016                               | 24,0         | 67,2           | 8,6      | 1,2 | 76 | 382 | 93  | 31 | 995   | 0,6 | 11.570 | 1.462 | 11,6 | 5,0  | 54,5    |
| 2015                               | 23,1         | 67,9           | 8,3      | 1,1 | 68 | 421 | 95  | 30 | 994   | 0,6 | 10.106 | 1.443 | 10,7 | 4,8  | 56,2    |
| 2014                               | 23,5         | 66,3           | 8,7      | 1,1 | 57 | 437 | 110 | 35 | 949   | 0,7 | 9.542  | 1.672 | 12,2 | 4,9  | 54,9    |
| 2013                               | 23,7         | 66,2           | 9,0      | 1,2 | 56 | 467 | 120 | 38 | 993   | 0,7 | 9.493  | 1.314 | 16,2 | 4,7  | 56,3    |
| 2012                               | 23,6         | 66,5           | 7,7      | 1,3 | 48 | 471 | 113 | 30 | 1.136 | 0,7 | 11.692 | 958   | 22,6 | 6,0  | 52,7    |
| 2011                               | 23,3         | 65,5           | 8,4      | 1,4 | 45 | 479 | 112 | 30 | 1.042 | 0,7 | 10.596 | 1.035 | 14,2 | 7,7  | 52,4    |
| 2010                               | 23,4         | 65,1           | 8,4      | 1,9 | 49 | 500 | 122 | 29 | 1.084 | 0,8 | 10.768 | 850   | 10,6 | 7,9  | 52,2    |
| 2009                               | 23,4         | 64,9           | 8,4      | 1,3 | 48 | 466 | 119 | 26 | 1.000 | 0,9 | 9.963  | 649   | 15,6 | 6,1  | 49,4    |
| 2008                               | 23,3         | 63,2           | 9,9      | 1,7 | 51 | 482 | 126 | 33 | 1.064 | 1,3 | 10.287 | 799   | 18,6 | 6,3  | 49,5    |
| 2007                               | 23,3         | 62,5           | 9,2      | 1,5 | 49 | 495 | 124 | 29 | 1.055 | 0,8 | 10.234 | 1.043 | 17,9 | 13,1 | 43,6    |
| 2006                               | 23,6         | 62,2           | 9,0      | 1,5 | 62 | 479 | 122 | 30 | 1.054 | 1,1 | 10.945 | 1.226 | 18,0 | 11,0 | 43,8    |
| 2005                               | 23,2         | 61,5           | 9,5      | 1,6 | 63 | 479 | 121 | 37 | 1.123 | 1,0 | 10.744 | 1.778 | 15,9 | 10,0 | 50,1    |
| 2004                               | 23,0         | 62,1           | 6,9      | 1,3 | 54 | 433 | 106 | 33 | 1.001 | 0,9 | 12.083 |       |      |      | 46,3    |

**Table 3: Sludge composition SNB (source: Milieujaarverslag SNB, 2020)**

Looking deeper into the historic data over the past 25 years, the following trends can be identified:

- A reduction of cadmium, lead and mercury in sewage sludge
- After 1996 no specific reduction is seen with regard to copper and zinc.
- A steady increase in organic matter content, despite more digestion of sewage sludge at the WWTPs.



**Figure 2: Reduction of Cd and Hg in sludge HVC (source: Milieujaarverslag HVC, 2020).**

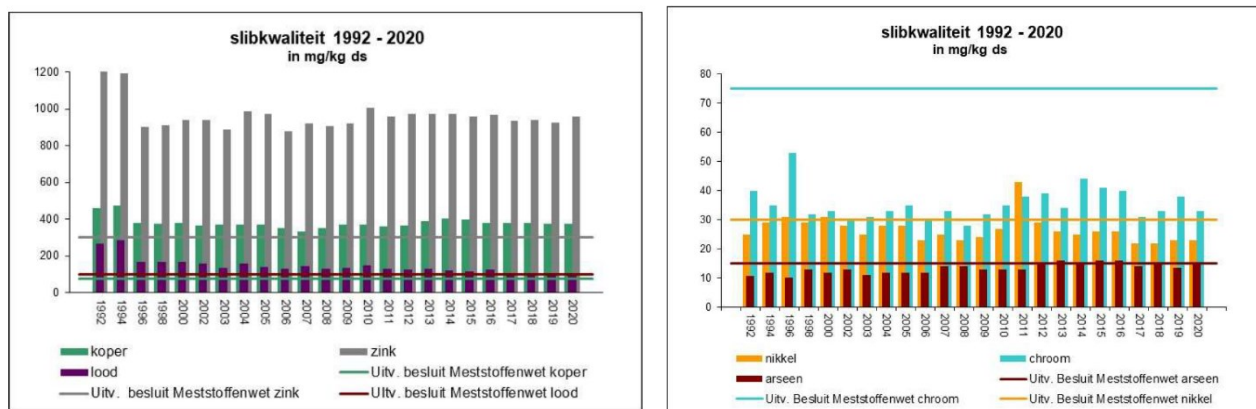


Figure 3: Heavy metals in sludge HVC (source: Milieujaarverslag HVC, 2020)

Concerning nickel and chrome no significant decrease could be distinguished, while for arsenic a slight increase is seen. This might have to do with arsenic in groundwater in the western parts (delta area) of The Netherlands.

The strong increase of chloride which can be seen in the sludge of SNB in the last 4 years is caused by a switch of large sludge supplying clients.

### 3. Sewage sludge ashes

#### 3.1 General overview

The project made it possible to assess all the available ash-data of HVC and SNB from 2009/2010 until 2020/2021. Weekly mixed samples and analyses are available from 2010 for phosphorus in the ashes, while other elements are usually analyzed on a monthly basis. The raw data is given in the appendix I.

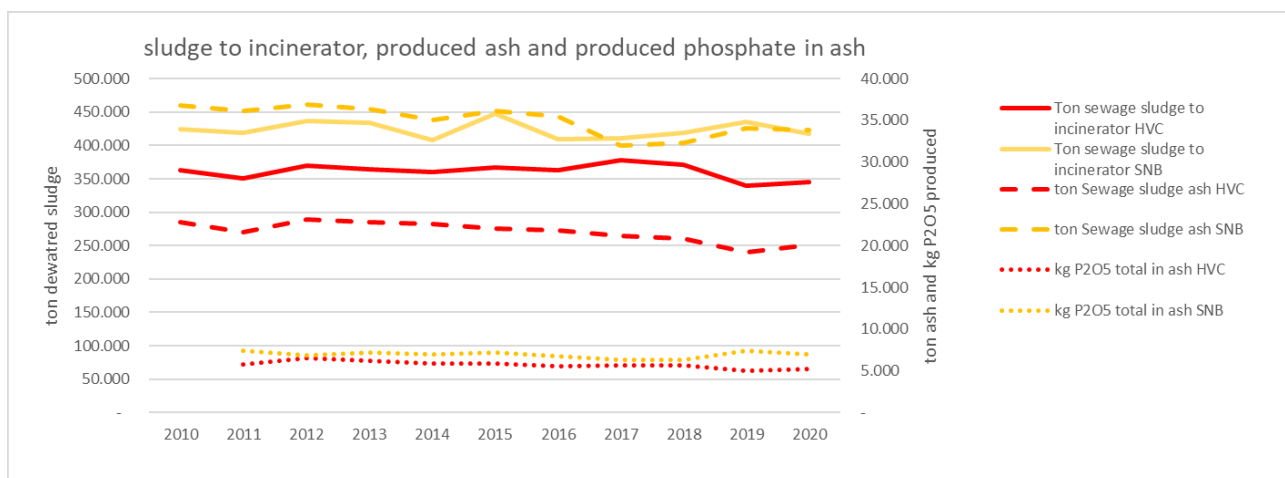
| year | Dewatered sludge to incinerator  |         |                            |         |      |      |      |      |                       |     | SVI-ashes                                |        |                |     |                         |       |
|------|----------------------------------|---------|----------------------------|---------|------|------|------|------|-----------------------|-----|------------------------------------------|--------|----------------|-----|-------------------------|-------|
|      | Ton sewage sludge to incinerator |         | ton dry matter incinerated |         | % ds |      | % os |      | P2O5/inorganic sludge |     | ton Sewage sludge ash after incineration |        | P2O5 (g/kg ds) |     | ton P2O5 total produced |       |
|      | HVC                              | SNB     | HVC                        | SNB     | HVC  | SNB  | HVC  | SNB  | HVC                   | SNB | HVC                                      | SNB    | HVC            | SNB | HVC                     | SNB   |
| 2011 | 350.000                          | 418.320 | 77.000                     | 97.608  | 22,0 | 23,3 | 68,2 | 65,5 | 24%                   | 22% | 21.575                                   | 36.164 | 268            | 206 | 5.758                   | 7.420 |
| 2012 | 369.300                          | 436.455 | 81.200                     | 102.922 | 22,0 | 23,6 | 69,1 | 66,4 | 26%                   | 20% | 23.182                                   | 36.953 | 282            | 188 | 6.498                   | 6.888 |
| 2013 | 363.900                          | 433.476 | 81.200                     | 102.791 | 22,3 | 23,7 | 68,8 | 66,2 | 25%                   | 21% | 22.862                                   | 36.359 | 274            | 197 | 6.239                   | 7.136 |
| 2014 | 360.100                          | 408.395 | 79.600                     | 95.905  | 22,2 | 23,5 | 69,5 | 66,3 | 24%                   | 22% | 22.642                                   | 35.000 | 258            | 202 | 5.832                   | 7.018 |
| 2015 | 367.700                          | 448.284 | 80.900                     | 103.772 | 22,0 | 23,1 | 70,8 | 67,9 | 25%                   | 22% | 22.080                                   | 36.136 | 267            | 200 | 5.886                   | 7.191 |
| 2016 | 362.900                          | 409.735 | 79.300                     | 98.459  | 21,9 | 24,0 | 70,8 | 67,2 | 24%                   | 21% | 21.782                                   | 35.461 | 255            | 192 | 5.513                   | 6.754 |
| 2017 | 378.500                          | 411.163 | 82.100                     | 94.851  | 21,7 | 23,1 | 72,1 | 70,0 | 25%                   | 22% | 21.116                                   | 31.955 | 270            | 200 | 5.678                   | 6.354 |
| 2018 | 370.700                          | 419.157 | 80.400                     | 97.155  | 21,7 | 23,2 | 72,2 | 69,2 | 25%                   | 21% | 20.809                                   | 32.269 | 272            | 198 | 5.630                   | 6.362 |
| 2019 | 339.400                          | 434.771 | 74.200                     | 97.713  | 21,9 | 22,5 | 72,7 | 68,3 | 25%                   | 24% | 19.196                                   | 34.014 | 264            | 220 | 4.978                   | 7.452 |
| 2020 | 345.400                          | 417.075 | 76.800                     | 94.503  | 22,2 | 22,7 | 71,9 | 69,2 | 24%                   | 24% | 20.050                                   | 33.812 | 265            | 209 | 5.235                   | 6.989 |

**Table 4: Sludge and SSA HVC and SNB (source: Milieujaarverslag HVC and Milieujaarverslag SNB, 2020)**

HVC incinerated about 360.000 tons of dewatered sludge on a yearly basis in the SVI (Slibverbrandingsinstallatie, Sewage sludge incineration plant), while SNB incinerated about 420.000 tons. The amount of ashes from the sludge in HVC and SNB is decreasing slightly with approximately 10% over the last 10 years. This is explained by the fact that the organic content in the sludge is slightly rising, despite an increase of digestion and biogas production at the WWTP's of the water authorities.

Based on the sludge material treated by the incinerators and the produced amounts of ashes and phosphate in ashes, differences are obvious between the HVC and the SNB flows:

- Ash ratio to sludge at SNB is higher, due to the higher inorganic content of the sludge (higher water content and a lower organic content) and due to the addition of calcium carbonate in the incineration process. As a consequence the P<sub>2</sub>O<sub>5</sub> % in ash of HVC is higher.
- The percentage of P<sub>2</sub>O<sub>5</sub> in supplied sludge to SNB varies more compared to HVC, which is probably caused by the incineration of a larger amount of sludge obtained via European Tenders by SNB leading to a larger number of clients. HVC is mainly treating sludge from their own shareholders.



**Figure 4: Ton input and output at HVC and SNB (source: Milieujaarverslag HVC and milieujaarverslag SNB, 2020).**

### 3.2 Detailed trends in ashes

The data of sewage sludge ashes of HVC and SNB are for the first time combined in one dataset to make it possible to compare the ash composition in an structured and visual attractive way.

The follow data is assessed:

1. Phosphate (weekly and annual trend)
2. Arsenic (weekly and annual trend)
3. Cadmium per ton of  $P_2O_5$  (weekly and annual trend)
4. Calcium per ton of  $P_2O_5$  (annual trend)
5. Aluminum per ton of  $P_2O_5$  (annual trend)
6. Iron per ton of  $P_2O_5$  (annual trend)

The other elements in the ashes (dry matter, organic matter, Cr, Cu, Ni, Pb, Zn, Mo, K and S) are given in the appendix II.

HVC and SNB have been monitoring the ash quality since the start of their installations. The amount of analyses and the frequency has changed. SNB started monitoring the ash quality on a weekly basis in 2017 with the start of Phos4You. Before 2017 the ash quality was monitored on a monthly base. HVC has already been monitoring the ash quality on a weekly bases before. Data from 2009 on has been used in this this report.

The parameters are very important to monitor on a high frequency basis, as they are relevant in the optimization settings in the technology and processes of phosphorus recovery.

Most of the heavy metals remain in the residue after acid leaching. This residue has to be disposed, but the higher the heavy metal concentration the higher the risks of toxicity which increases the challenges for safe disposal or reuse. Some slight concentration will end of the raw phosphoric acid as recovered product, which will have to purified by nano-filtration to get rid of the final pollutants and to reach the technical or merchant grade quality.

Iron and aluminum are available in sludge and in ashes as caused, partly, by the use of Fe and Al-containing coagulants for P-removal in waste water. The chemical leaching process during P-recovery from ashes needs to be settled in such a way that the optimum is achieved in the removal and/or recovery of iron and aluminum salts, or example via an ion-exchange process.

Calcium plays a role in the formation of gypsum in case a sulphuric acid is used in the P-recovery process.

### 3.2.1 Phosphate

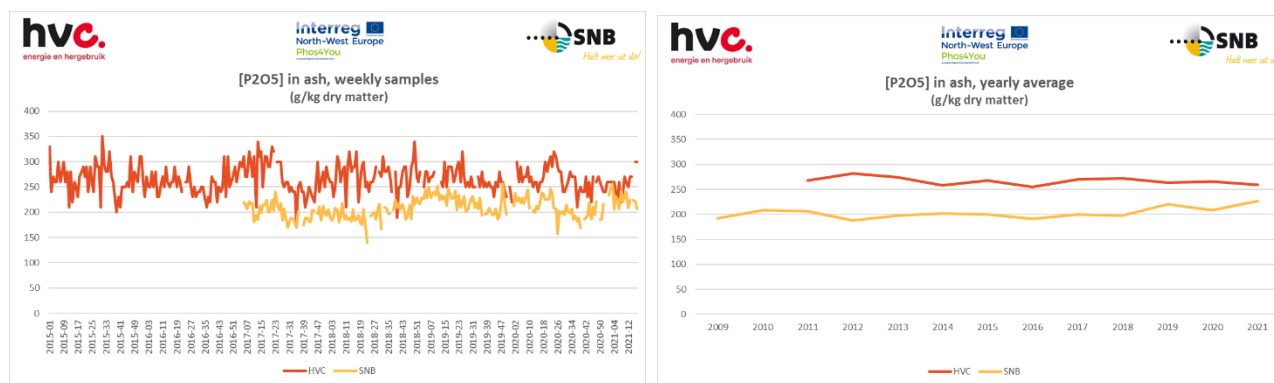


Figure 5: Phosphate in ash (source: own illustration based on weekly sampling program)

Phosphorus content varies between the ashes of HVC and SNB, mainly due to addition of Ca in the incineration process of SNB. As a consequence the ashes of SNB are a bit more 'diluted'.

### 3.2.2 Arsenic

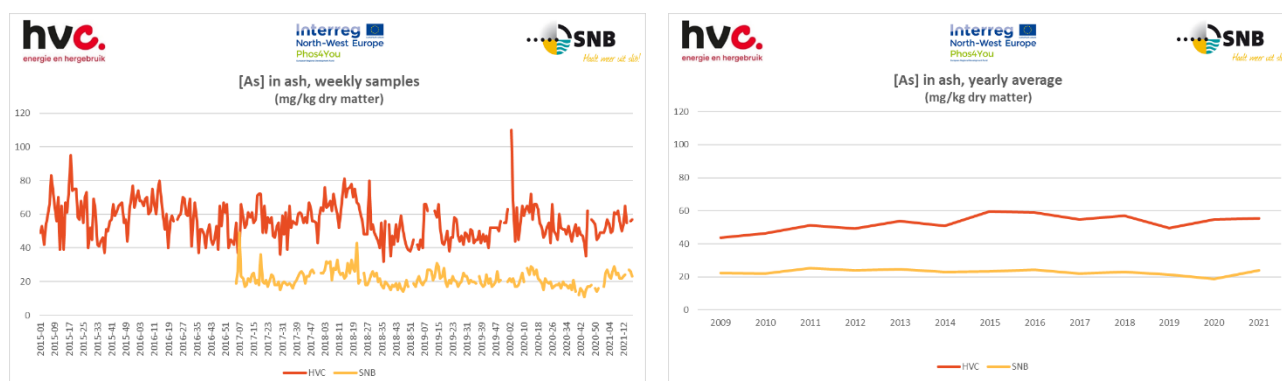


Figure 6: Arsenic in ash (source: own illustration based on weekly sampling program)

Arsenic in ashes might be caused by groundwater effects in sewers.

### 3.2.3 Cadmium

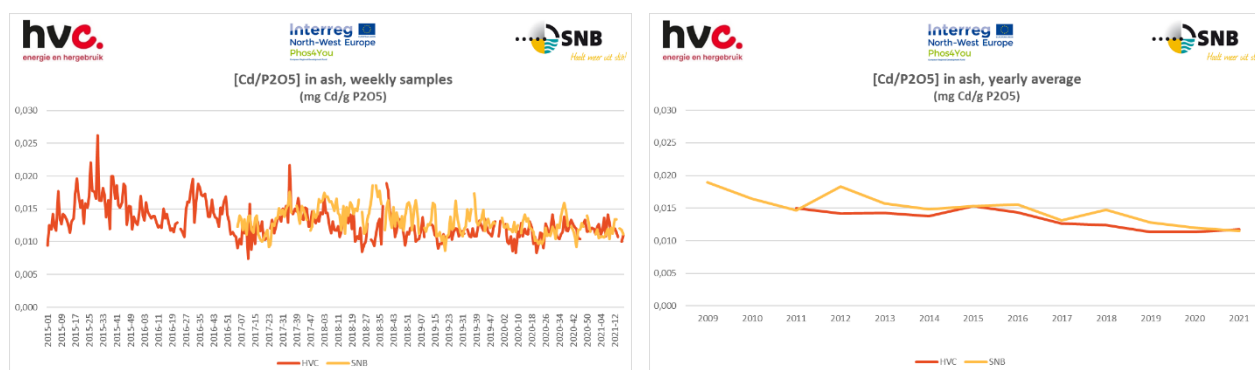


Figure 7: Cadmium in ash (source: own illustration based on weekly sampling program)

Cadmium levels are slowly reducing, maybe due to less effects of industrial influences to sewage sludge.

### 3.2.4 Calcium

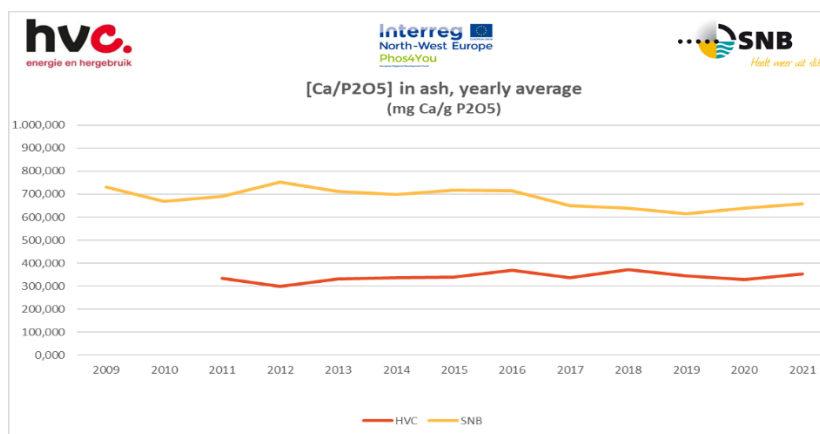


Figure 8: Calcium in ash (source: own illustration based on weekly sampling program)

Lime is added into the incineration process of SNB.

### 3.2.5 Aluminum

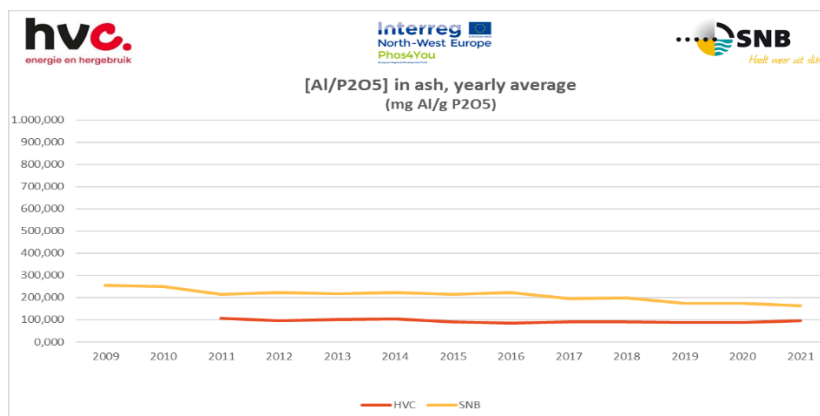


Figure 9: Aluminum in ash (source: own illustration based on weekly sampling program)

The Al/P ratio is important to monitor in relation to the coagulant use at WWTP's and for further P-recovery from ashes.

### 3.2.6 Iron

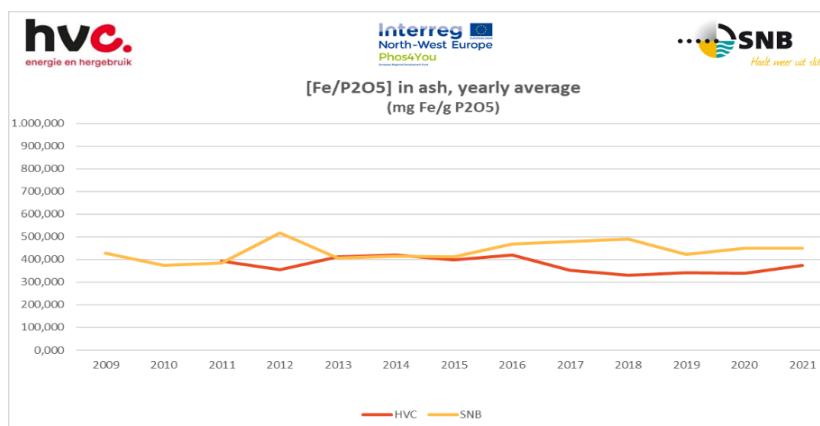


Figure 10: Iron in ash (source: own illustration based on weekly sampling program)

## 4. SSA: waste or end-of-waste and its implications

It has been topic of discussion to what extend end of waste for sewage sludge fly ash for P-recovery purposes is useful or valuable. Until now, within Europe's stakeholders on P-recovery and the use in final products, more and more discourse took place on end-of-waste on fly ashes and on end products.

For the purpose of recycling the P contained into the SSA, the SSA can be delivered to external companies either as a "waste" or as a "product". When delivered as a "waste", the SSA need to comply to the transport rules for waste. Also, the factory receiving the SSA needs to obtain a specific permit allowing it to manage waste. In the factory, the SSA remain waste until the final product is CE-marked (in case of integration of the SSA into a fertilising product).

To have the SSA delivered as a "product", the SSA first need to obtain the "end-of-waste status". The transport rules for waste do not apply anymore; a REACH registration of the SSA is necessary.

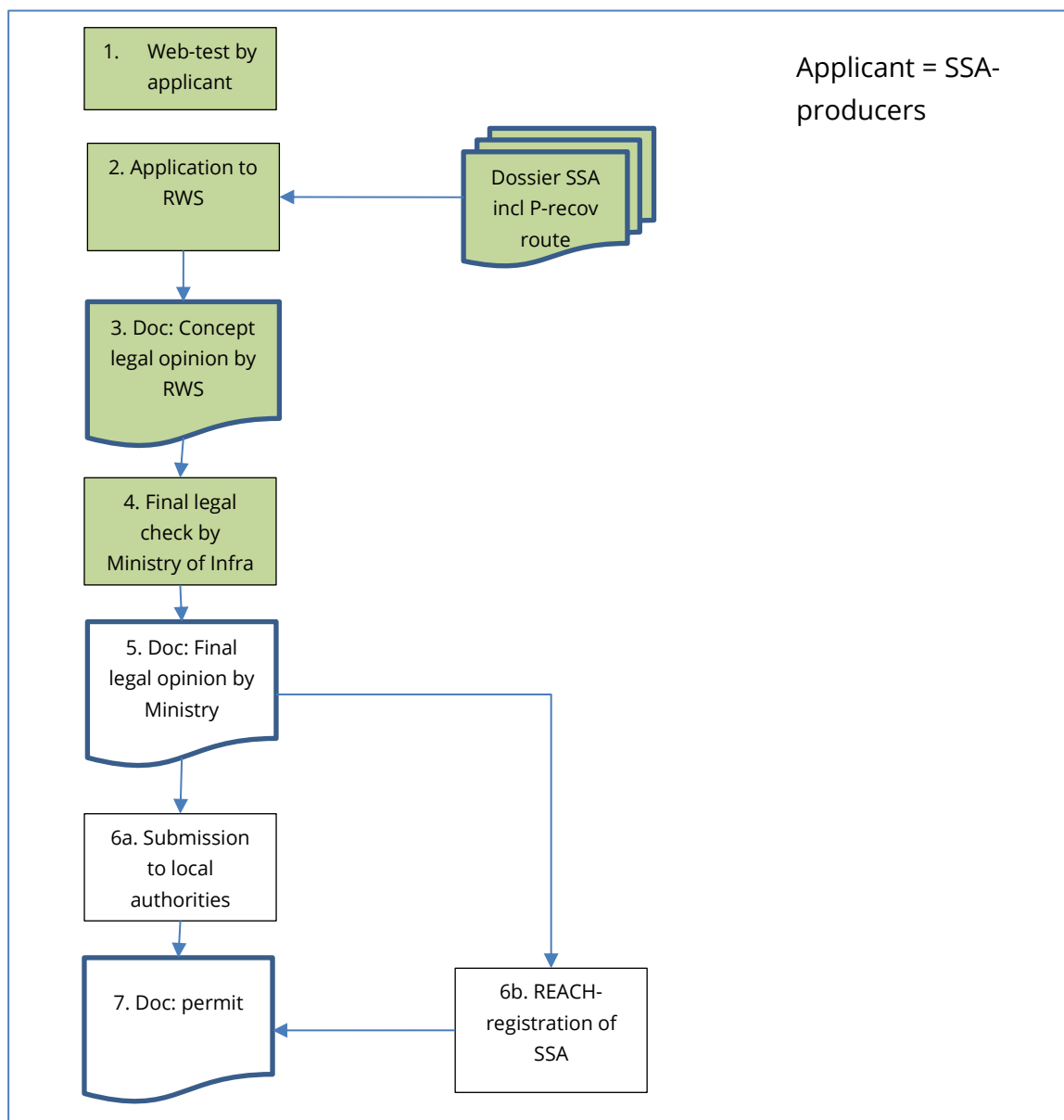
If SSA with end-of-waste status might enhance its monetary value, ease its transportation and acceptance at receiving factory, SSA as waste might better guarantee its traceability until its integration into products.

Also considerations with regard to the quality of the products in which P-recyclates are used, the market demand, and responsibility of the actors in the value chain need to be taken into account.

In the Netherlands, to check the possibilities on end of waste, by-product or resource, companies are enabled to conduct an web-test. The status with regard to end of waste was also tested for the HVC and SNB sewage sludge ashes. This was done via the website: <https://www.afvalcirculair.nl/onderwerpen/afval/toetsing-afval/webtoets-afval/>

In a next step, an assessment was done by Rijkswaterstaat on the SNB and HVC ashes for the specific phosphate recovery route to Ecophos in 2019/early 2020. This stopped due to the bankruptcy of Ecophos in early 2020.

The procedure is schematically depicted in the block scheme below.



**Figure 11: Procedure end of waste**

After obtaining the final legal opinion from the Ministry (step 5) by the applicant (the SSA producer), it is up to the applicant to submit the dossier to the local permitting authorities to get the final permits. However, a REACH-registration will be needed once SSA has no waste status anymore. The REACH –processes is time consuming and expected to be costly. Until now, HVC and SNB have gone through the process until step 4. After step 5 is finished, depending on the specific situation, an evaluation would hopefully point out the advantages and disadvantages to proceed to the next step. This, however, would only be interesting in case a larger consortium could be formed and shared commitment of major stakeholders is present.

# Appendices

## Appendix I: Sewage sludge ash analyses

### Concentrations in ash HVC & SNB

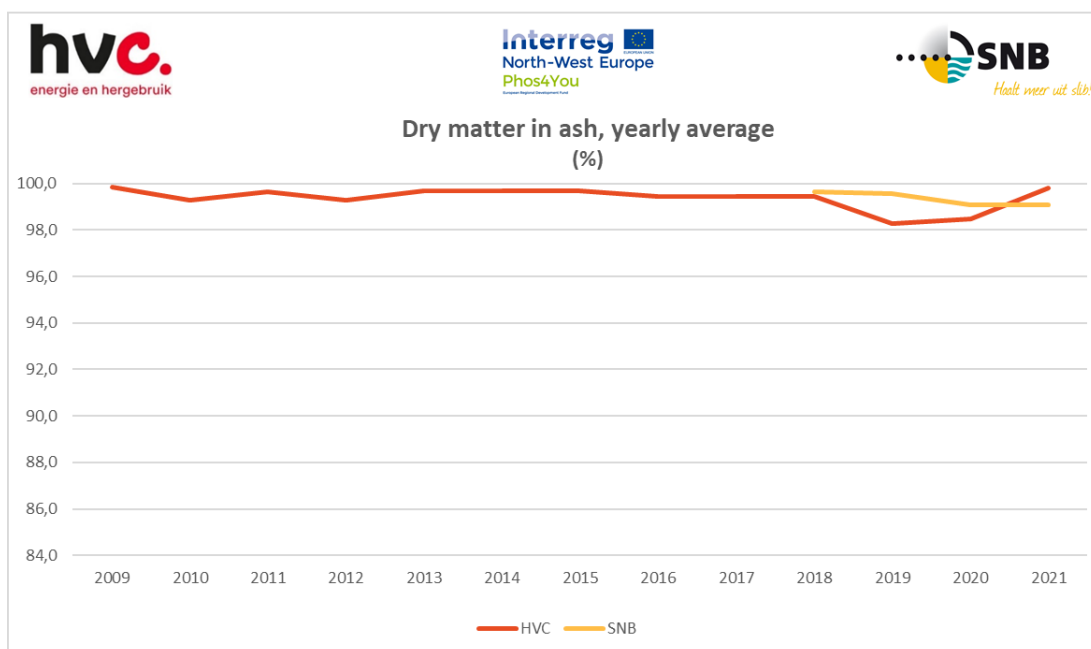
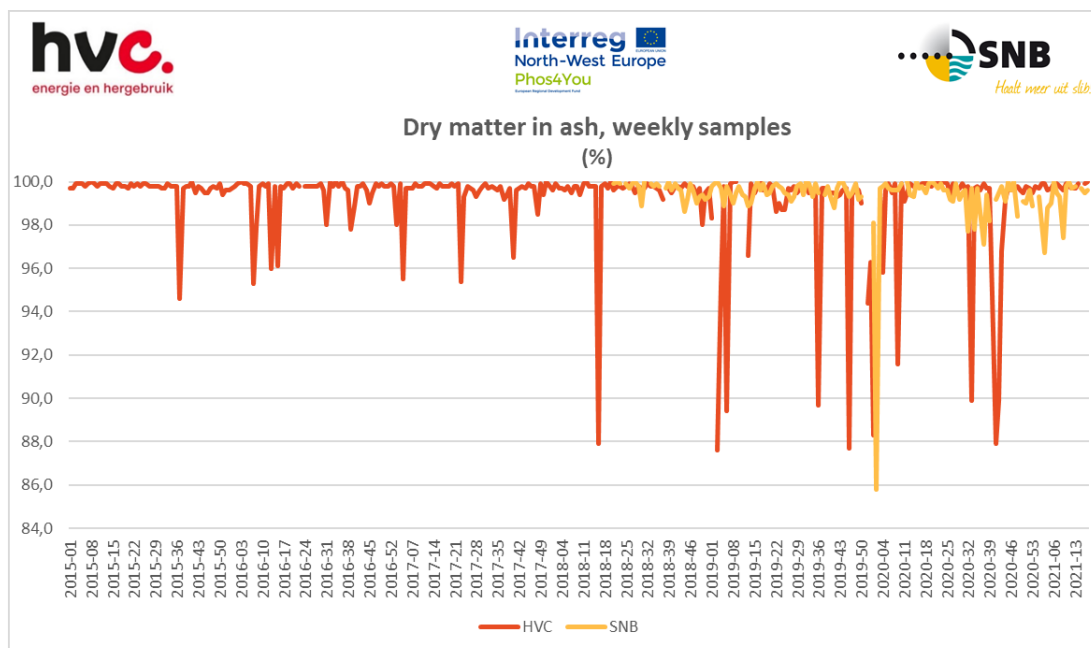
|                | Dry matter |      | Org. matter |     | Cd               |     |              |       | Cr               |     |              |       | Cu               |     |              |     | Ni               |      |              |      | Pb               |       |              |       | Zn               |      |              |     | As |      |      |  |
|----------------|------------|------|-------------|-----|------------------|-----|--------------|-------|------------------|-----|--------------|-------|------------------|-----|--------------|-----|------------------|------|--------------|------|------------------|-------|--------------|-------|------------------|------|--------------|-----|----|------|------|--|
|                | %          |      | %           |     | mg/kg dry matter |     | mg Cd/g P2O5 |       | mg/kg dry matter |     | mg Cr/g P2O5 |       | mg/kg dry matter |     | mg Ni/g P2O5 |     | mg/kg dry matter |      | mg Pb/g P2O5 |      | mg/kg dry matter |       | mg Zn/g P2O5 |       | mg/kg dry matter |      | mg As/g P2O5 |     |    |      |      |  |
|                | HVC        | SNB  | HVC         | SNB | HVC              | SNB | HVC          | SNB   | HVC              | SNB | HVC          | SNB   | HVC              | SNB | HVC          | SNB | HVC              | SNB  | HVC          | SNB  | HVC              | SNB   | HVC          | SNB   | HVC              | SNB  | HVC          | SNB |    |      |      |  |
| Yearly average | 99.8       | 99.8 | 0.2         |     | 3.6              | 3.6 |              | 0.019 | 95               | 116 | 0.61         | 1.063 | 1.075            | 5.6 | 76           | 65  | 0.34             | 424  | 282          | 1.47 | 2.898            | 2.217 | 11.6         | 44    | 22               |      |              |     |    |      |      |  |
| 2009           | 99.3       | 99.3 | 0.3         |     | 3.7              | 3.4 |              | 0.016 | 105              | 113 | 0.54         | 1.045 | 1.131            | 5.4 | 84           | 67  | 0.32             | 455  | 280          | 1.34 | 2.919            | 2.350 | 11.3         | 46    | 22               |      |              |     |    |      |      |  |
| 2010           | 99.6       | 99.6 | 0.5         |     | 4.0              | 3.0 | 0.015        | 0.015 | 124              | 94  | 0.46         | 1.118 | 1.362            | 4.2 | 6.6          | 142 | 63               | 0.53 | 0.31         | 434  | 263              | 1.62  | 1.27         | 3.027 | 2.225            | 11.3 | 10.8         | 51  | 25 | 0.19 | 0.12 |  |
| 2012           | 99.3       | 99.5 | 0.5         |     | 4.0              | 3.4 | 0.014        | 0.018 | 117              | 99  | 0.41         | 1.087 | 984              | 3.9 | 5.2          | 91  | 62               | 0.32 | 0.33         | 421  | 281              | 1.49  | 1.50         | 2.992 | 2.717            | 10.6 | 14.5         | 49  | 24 | 0.17 | 0.13 |  |
| 2013           | 99.7       | 99.7 | 0.6         |     | 3.9              | 3.1 | 0.014        | 0.016 | 120              | 139 | 0.44         | 1.188 | 1.063            | 4.3 | 5.5          | 83  | 89               | 0.30 | 0.45         | 420  | 317              | 1.53  | 1.80         | 3.188 | 2.550            | 11.6 | 12.9         | 54  | 25 | 0.20 | 0.12 |  |
| 2014           | 99.7       | 99.7 | 0.3         |     | 3.6              | 3.0 | 0.014        | 0.015 | 144              | 158 | 0.56         | 1.205 | 1.092            | 4.7 | 5.4          | 88  | 91               | 0.34 | 0.45         | 413  | 301              | 1.60  | 1.49         | 3.208 | 2.475            | 12.4 | 12.3         | 51  | 23 | 0.20 | 0.11 |  |
| 2015           | 99.7       | 99.7 | 0.2         |     | 4.1              | 3.1 | 0.015        | 0.015 | 142              | 177 | 0.53         | 1.290 | 1.027            | 4.8 | 5.1          | 92  | 79               | 0.34 | 0.39         | 441  | 254              | 1.65  | 1.27         | 3.611 | 2.650            | 13.5 | 13.2         | 60  | 23 | 0.22 | 0.12 |  |
| 2016           | 99.4       | 99.4 | 0.3         |     | 3.6              | 3.0 | 0.014        | 0.016 | 121              | 202 | 0.47         | 1.210 | 949              | 4.8 | 5.0          | 84  | 79               | 0.33 | 0.41         | 434  | 247              | 1.71  | 1.29         | 3.359 | 2.542            | 13.2 | 13.3         | 59  | 24 | 0.23 | 0.13 |  |
| 2017           | 99.5       | 99.5 | 0.3         | 1.8 | 3.4              | 2.6 | 0.013        | 0.013 | 108              | 135 | 0.40         | 1.358 | 883              | 5.0 | 4.4          | 85  | 76               | 0.32 | 0.38         | 393  | 221              | 1.45  | 1.11         | 3.529 | 2.444            | 13.1 | 12.2         | 55  | 22 | 0.20 | 0.11 |  |
| 2018           | 99.5       | 99.6 | 0.3         | 1.5 | 3.4              | 2.9 | 0.012        | 0.015 | 110              | 132 | 0.41         | 1.301 | 946              | 4.8 | 4.8          | 85  | 76               | 0.31 | 0.38         | 364  | 208              | 1.34  | 1.05         | 3.396 | 2.529            | 12.5 | 12.8         | 57  | 23 | 0.21 | 0.12 |  |
| 2018           | 98.3       | 99.6 | 0.3         | 1.5 | 3.0              | 2.8 | 0.011        | 0.013 | 130              | 124 | 0.49         | 1.310 | 1.019            | 5.0 | 4.6          | 88  | 70               | 0.34 | 0.32         | 354  | 211              | 1.34  | 0.96         | 3.413 | 2.708            | 12.9 | 12.3         | 49  | 21 | 0.19 | 0.10 |  |
| 2020           | 98.5       | 99.1 | 0.2         | 1.6 | 3.0              | 2.5 | 0.011        | 0.012 | 109              | 109 | 0.41         | 1.310 | 929              | 4.9 | 4.5          | 84  | 61               | 0.32 | 0.29         | 361  | 187              | 1.36  | 0.90         | 3.500 | 2.446            | 13.2 | 11.7         | 55  | 19 | 0.21 | 0.09 |  |
| 2021           | 99.8       | 99.1 | 0.2         | 2.0 | 3.0              | 2.6 | 0.012        | 0.012 | 126              | 106 | 0.49         | 1.206 | 961              | 4.7 | 4.2          | 82  | 66               | 0.32 | 0.29         | 314  | 188              | 1.21  | 0.83         | 3.531 | 2.744            | 13.6 | 12.1         | 55  | 24 | 0.21 | 0.11 |  |
| 2022           | 99.8       | 99.1 | 0.2         | 2.0 | 3.0              | 2.6 | 0.012        | 0.012 | 126              | 106 | 0.49         | 1.206 | 961              | 4.7 | 4.2          | 82  | 66               | 0.32 | 0.29         | 314  | 188              | 1.21  | 0.83         | 3.531 | 2.744            | 13.6 | 12.1         | 55  | 24 | 0.21 | 0.11 |  |

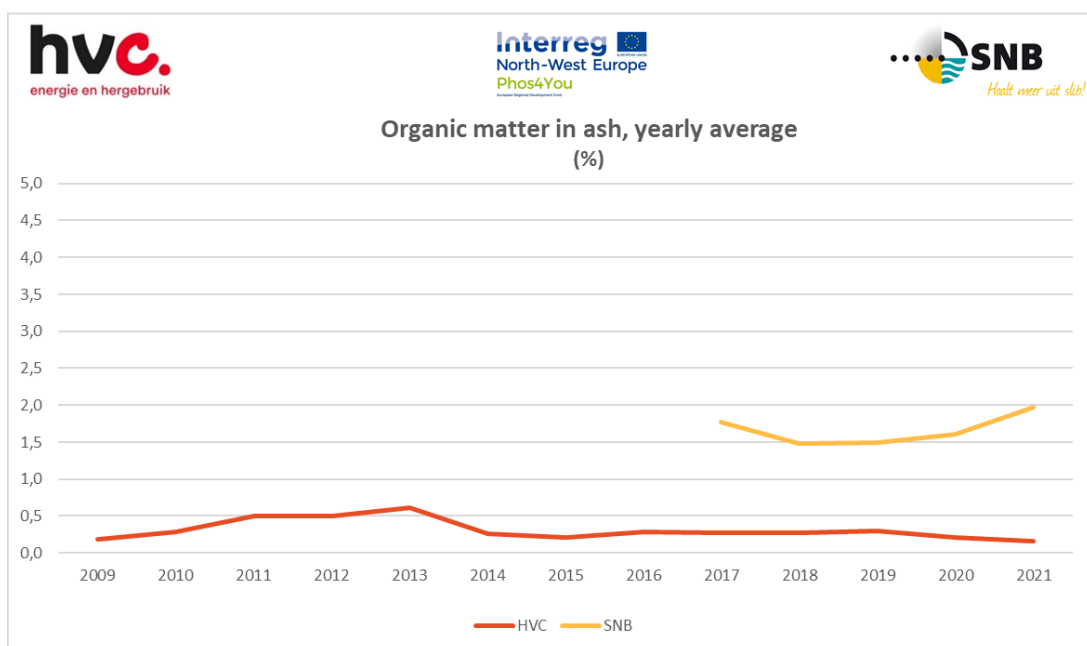
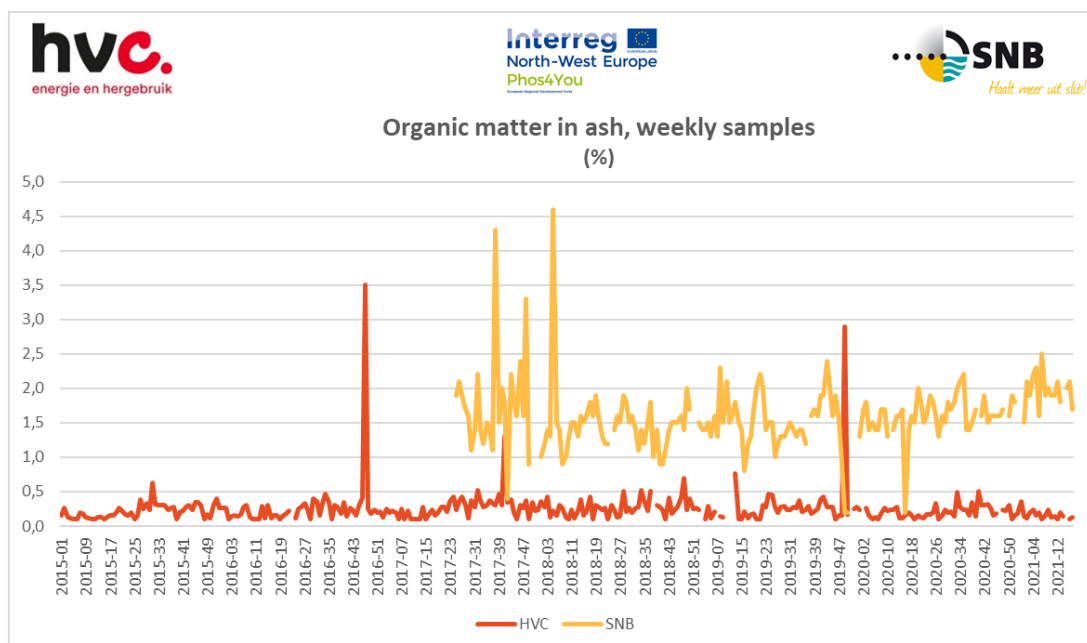
### Concentrations in ash HVC & SNB

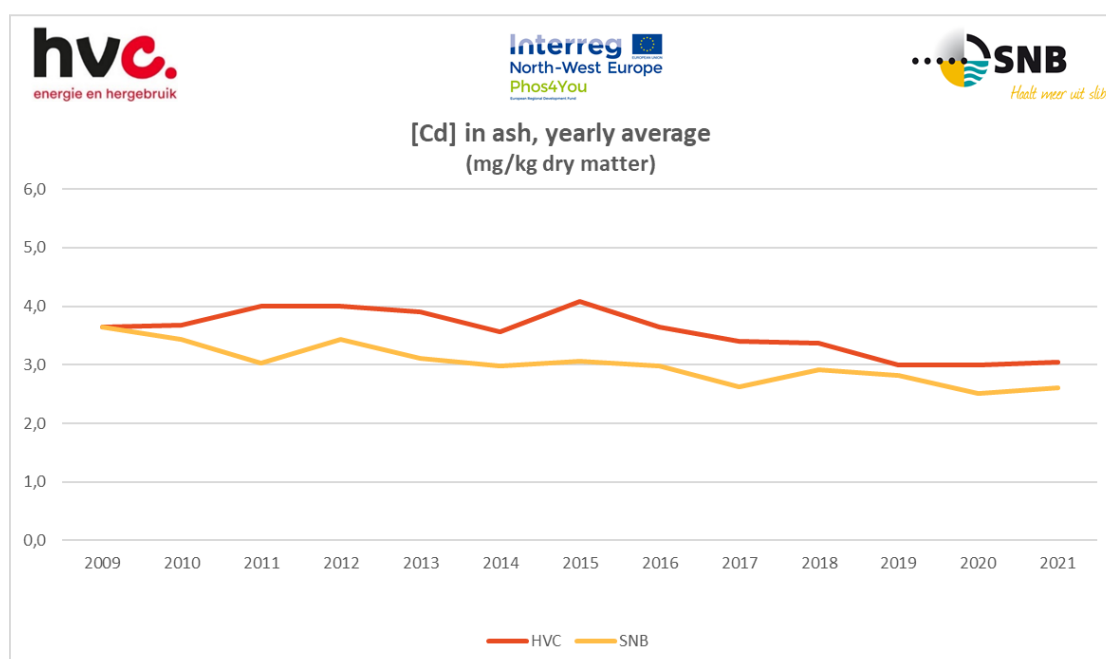
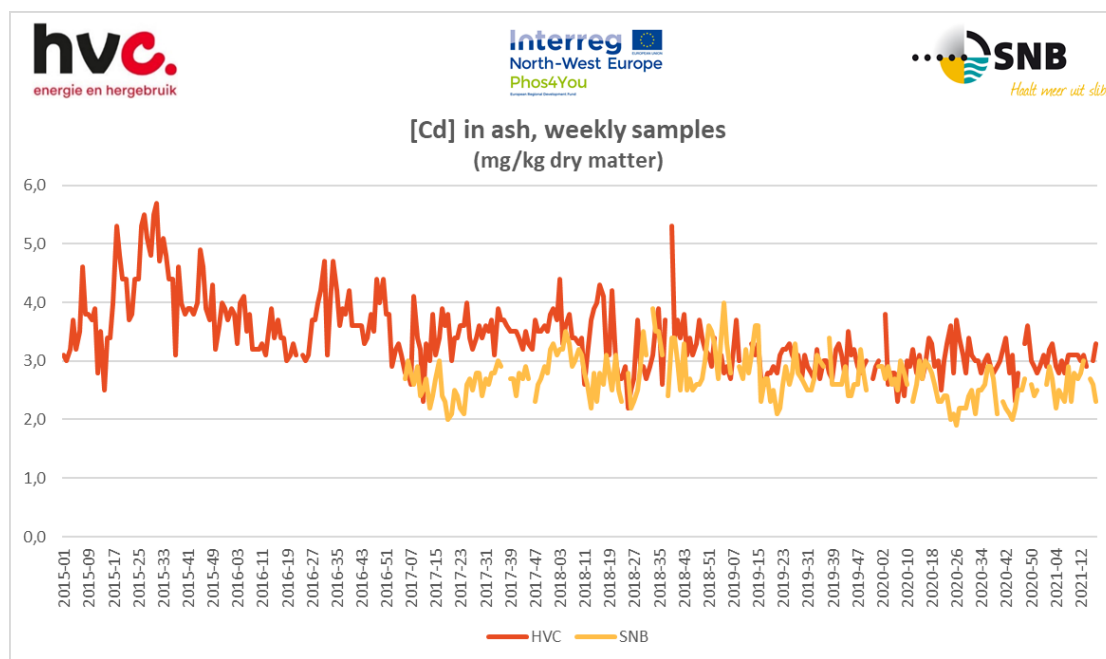
n.d. = not detectable.

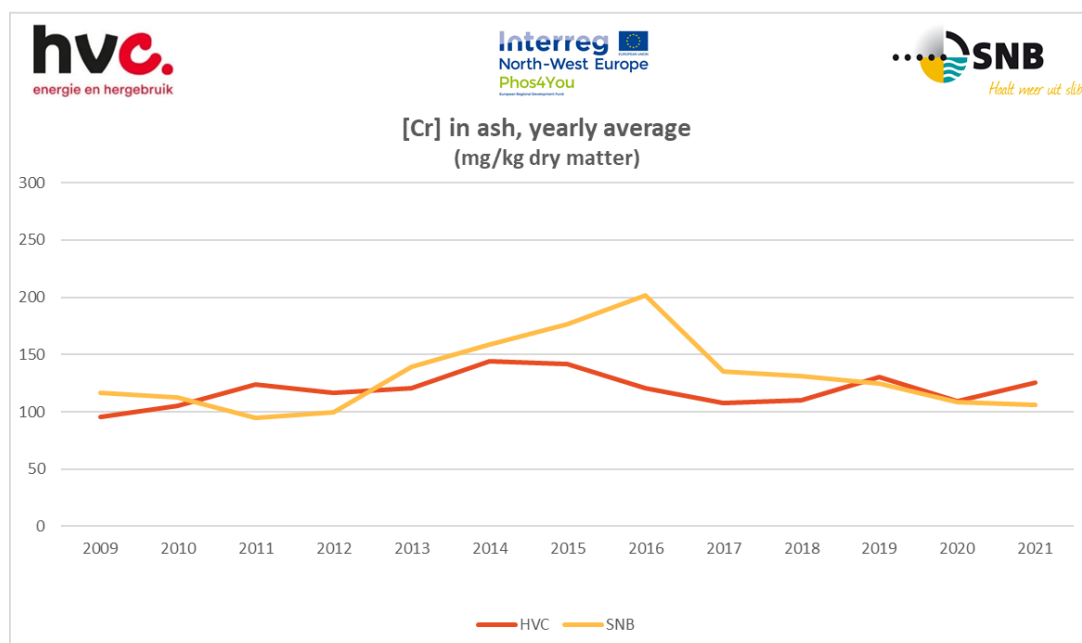
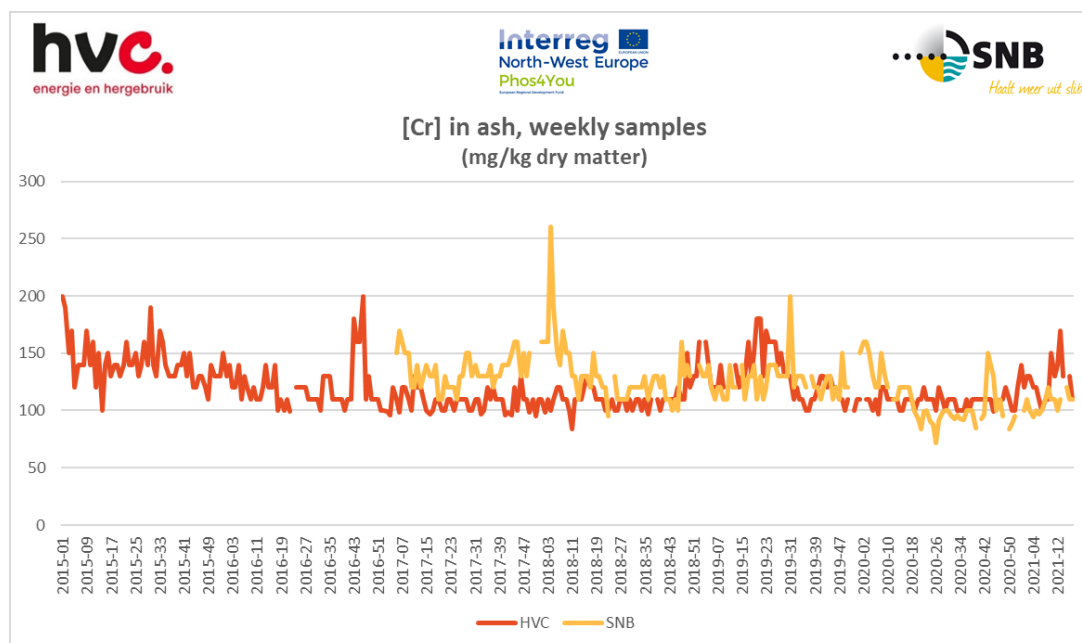
| Yearly average | Mo               |     |              |      |                  |        | Ca           |     |                  |         |              |     | Fe               |         |              |     |                  |        | K           |      |                 |       |            |       | P2O5                 |       | S    |  | TE-PCDD/F-NATO/CCMS |  |  |  |
|----------------|------------------|-----|--------------|------|------------------|--------|--------------|-----|------------------|---------|--------------|-----|------------------|---------|--------------|-----|------------------|--------|-------------|------|-----------------|-------|------------|-------|----------------------|-------|------|--|---------------------|--|--|--|
|                | mg/kg dry matter |     | mg Mo/g P2O5 |      | mg/kg dry matter |        | mg Al/g P2O5 |     | mg/kg dry matter |         | mg Ca/g P2O5 |     | mg/kg dry matter |         | mg Fe/g P2O5 |     | mg/kg dry matter |        | mg K/g P2O5 |      | g/kg dry matter |       | g S/g P2O5 |       | ng TEQ/kg dry matter |       |      |  |                     |  |  |  |
|                | HVC              | SNB | HVC          | SNB  | HVC              | SNB    | HVC          | SNB | HVC              | SNB     | HVC          | SNB | HVC              | SNB     | HVC          | SNB | HVC              | SNB    | HVC         | SNB  | HVC             | SNB   | HVC        | SNB   | HVC                  | SNB   |      |  |                     |  |  |  |
| 2009           | 29               | 24  | 0.13         |      | 49               | 158    |              | 256 |                  | 140.083 |              | 730 |                  | 82.300  |              | 429 |                  | 192    |             | 18.7 |                 | 0.097 |            |       |                      |       |      |  |                     |  |  |  |
| 2010           | 29               | 26  | 0.13         |      | 51.075           |        | 249          |     | 139.250          |         | 698          |     | 78.033           |         | 374          |     | 209              |        | 18.5        |      | 0.089           |       |            |       |                      |       |      |  |                     |  |  |  |
| 2011           | 33               | 28  | 0.12         | 0.14 | 28.702           | 44.350 | 107          | 215 | 89.489           | 142.500 | 334          | 690 | 105.085          | 79.267  | 392          | 384 | 19.146           |        | 71          | 268  | 206             | 3.5   | 18.1       | 0.013 | 0.088                |       |      |  |                     |  |  |  |
| 2012           | 31               | 29  | 0.11         | 0.15 | 27.064           | 41.917 | 96           | 224 | 84.319           | 141.063 | 299          | 752 | 100.404          | 97.050  | 356          | 518 | 18.334           |        | 65          | 282  | 188             | 3.4   | 17.6       | 0.012 | 0.094                | n.d.  |      |  |                     |  |  |  |
| 2013           | 33               | 31  | 0.12         | 0.16 | 27.420           | 42.950 | 100          | 218 | 91.040           | 140.833 | 333          | 713 | 112.840          | 79.983  | 412          | 405 | 18.379           |        | 67          | 274  | 197             | 4.3   | 20.4       | 0.016 | 0.103                | n.d.  |      |  |                     |  |  |  |
| 2014           | 33               | 27  | 0.13         | 0.13 | 27.091           | 45.025 | 105          | 223 | 87.091           | 140.917 | 337          | 699 | 108.545          | 83.342  | 420          | 413 | 16.273           |        | 63          | 258  | 202             | 3.6   | 17.3       | 0.014 | 0.086                |       |      |  |                     |  |  |  |
| 2015           | 36               | 30  | 0.13         | 0.15 | 24.364           | 42.992 | 91           | 215 | 90.636           | 143.583 | 339          | 717 | 106.818          | 82.550  | 399          | 412 | 17.909           |        | 67          | 267  | 200             | 4.2   | 17.0       | 0.016 | 0.085                | n.d.  |      |  |                     |  |  |  |
| 2016           | 36               | 25  | 0.14         | 0.13 | 21.475           | 42.617 | 84           | 222 | 93.667           | 137.000 | 368          | 715 | 106.563          | 89.692  | 419          | 468 | 18.250           | 13.500 | 72          | 70   | 255             | 192   | 4.2        | 17.0  | 0.017                | 0.089 | 0.87 |  |                     |  |  |  |
| 2017           | 39               | 26  | 0.15         | 0.13 | 24.400           | 38.180 | 90           | 196 | 90.900           | 129.776 | 336          | 649 | 96.143           | 95.693  | 352          | 478 | 20.400           | 13.650 | 75          | 68   | 270             | 200   | 4.0        | 15.0  | 0.015                | 0.075 | 0.81 |  |                     |  |  |  |
| 2018           | 38               | 25  | 0.14         | 0.13 | 24.733           | 38.988 | 91           | 197 | 100.867          | 126.551 | 371          | 639 | 90.000           | 96.912  | 331          | 490 | 18.733           | 13.427 | 69          | 68   | 272             | 198   | 4.4        | 13.9  | 0.016                | 0.070 | 0.68 |  |                     |  |  |  |
| 2019           | 38               | 26  | 0.14         | 0.12 | 23.400           | 38.259 | 89           | 174 | 90.700           | 135.004 | 344          | 614 | 90.000           | 92.694  | 341          | 421 | 18.700           | 12.088 | 71          | 55   | 264             | 220   | 4.4        | 15.6  | 0.017                | 0.071 | 0.02 |  |                     |  |  |  |
| 2020           | 35               | 24  | 0.13         | 0.12 | 23.083           | 36.224 | 87           | 174 | 86.833           | 133.140 | 328          | 638 | 90.000           | 93.982  | 339          | 451 | 19.067           | 11.406 | 72          | 55   | 265             | 209   | 3.3        | 15.5  | 0.012                | 0.074 | 0.36 |  |                     |  |  |  |
| 2021           | 34               | 23  | 0.13         | 0.10 | 24.500           | 37.025 | 95           | 163 | 91.500           | 149.063 | 354          | 658 | 96.750           | 101.556 | 374          | 448 | 19.500           | 13.838 | 71          | 61   | 259             | 227   | 3.4        | 17.1  | 0.013                | 0.075 | 0.36 |  |                     |  |  |  |

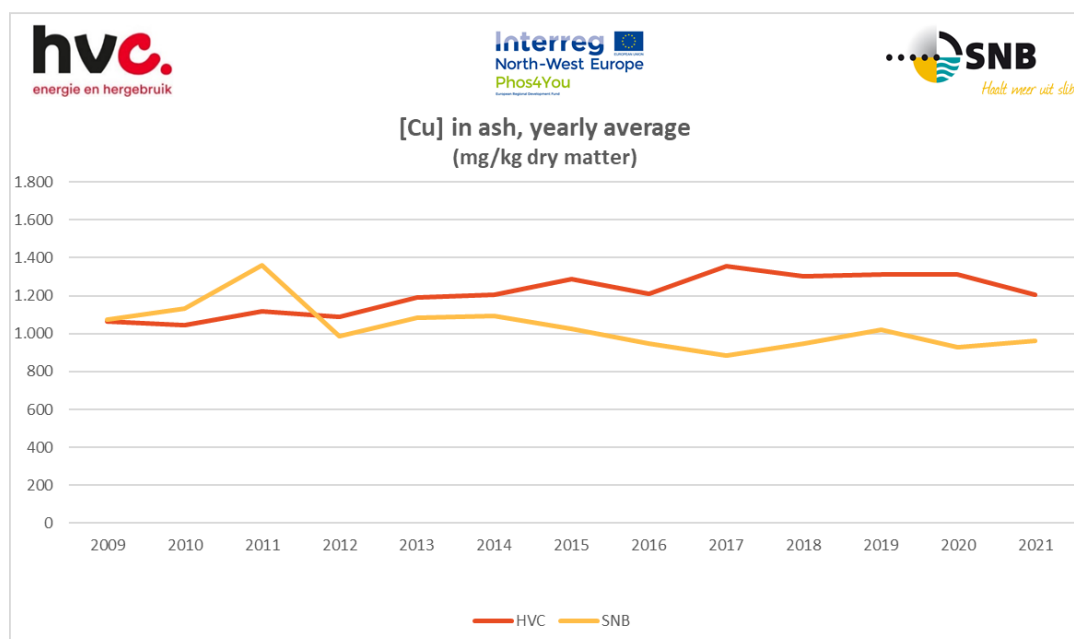
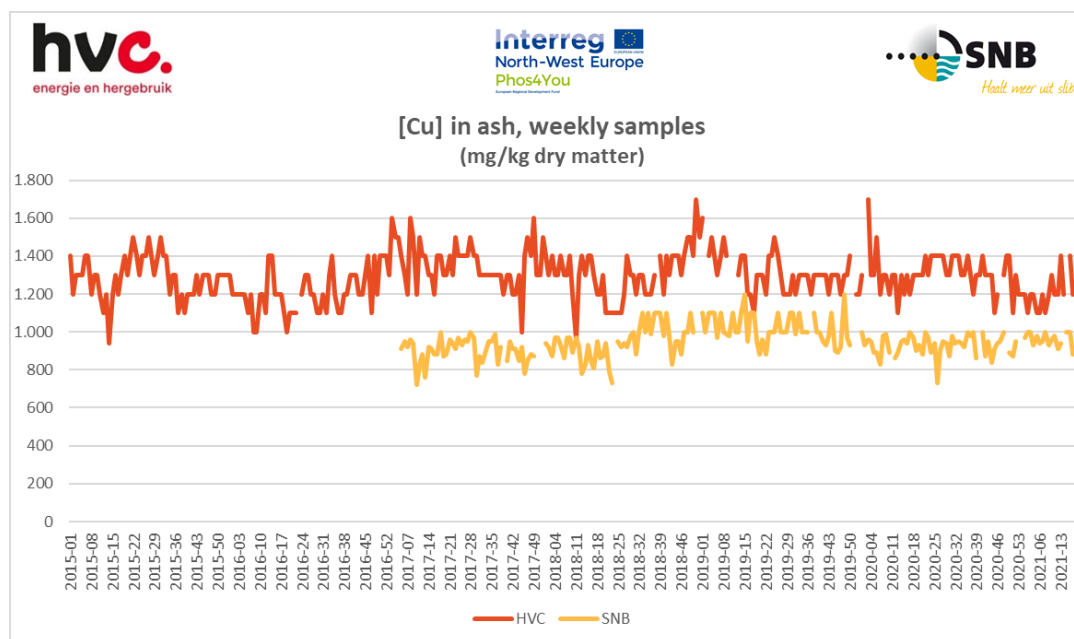
## Appendix II: Elements in ash

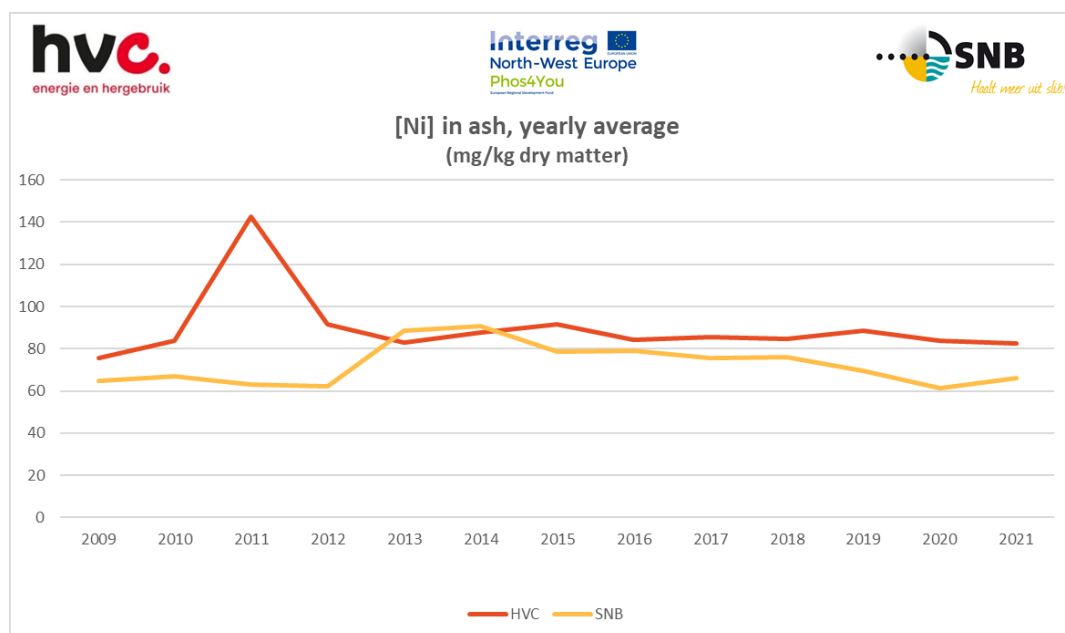
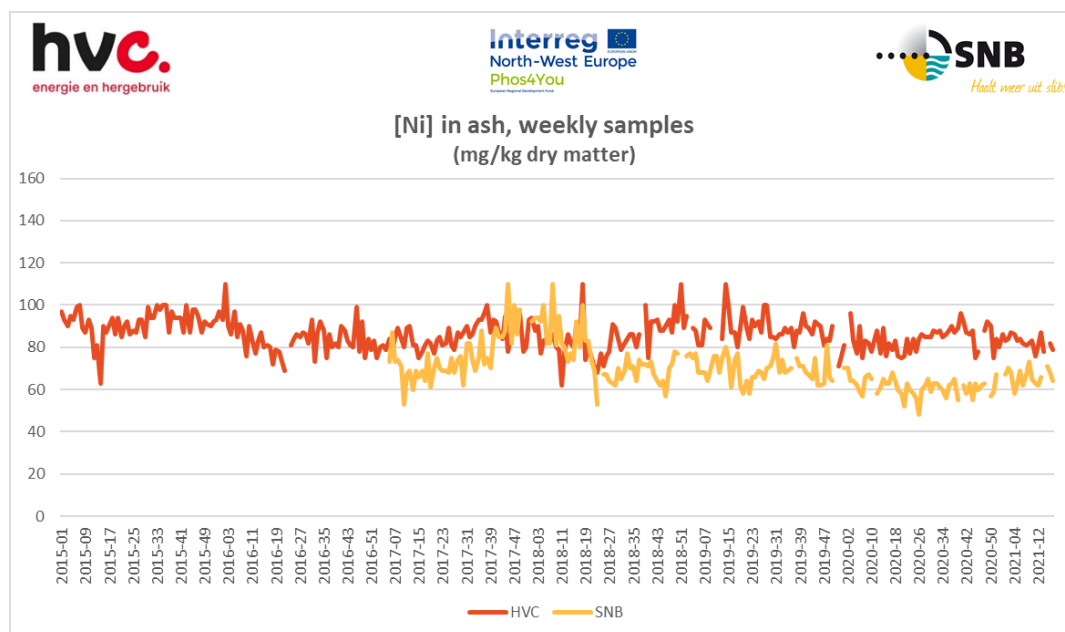


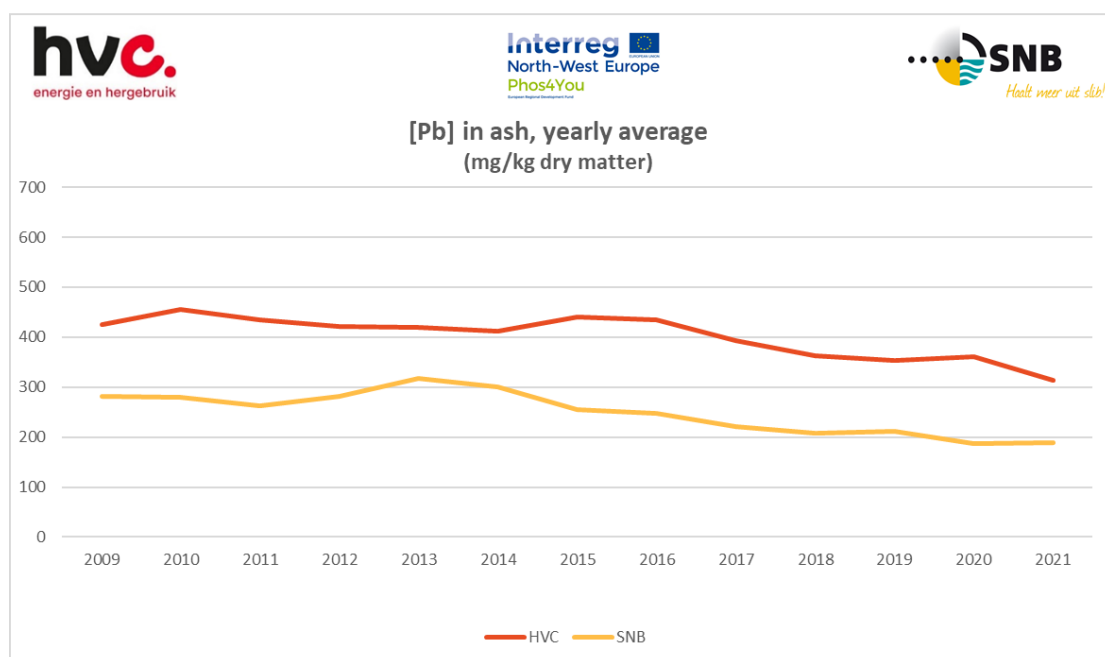
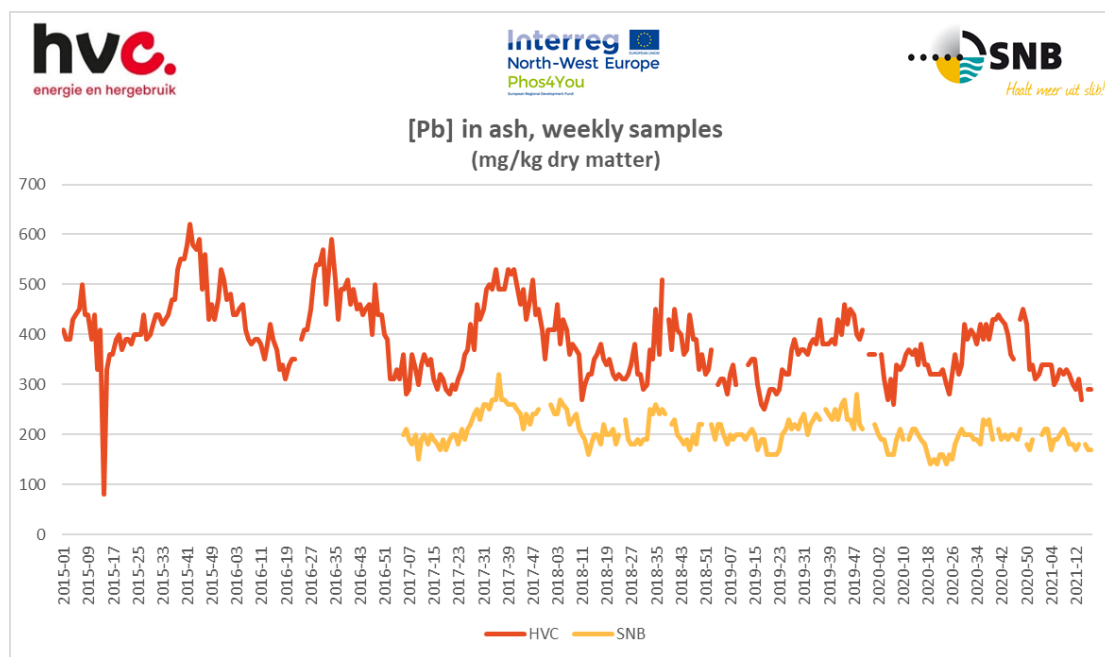


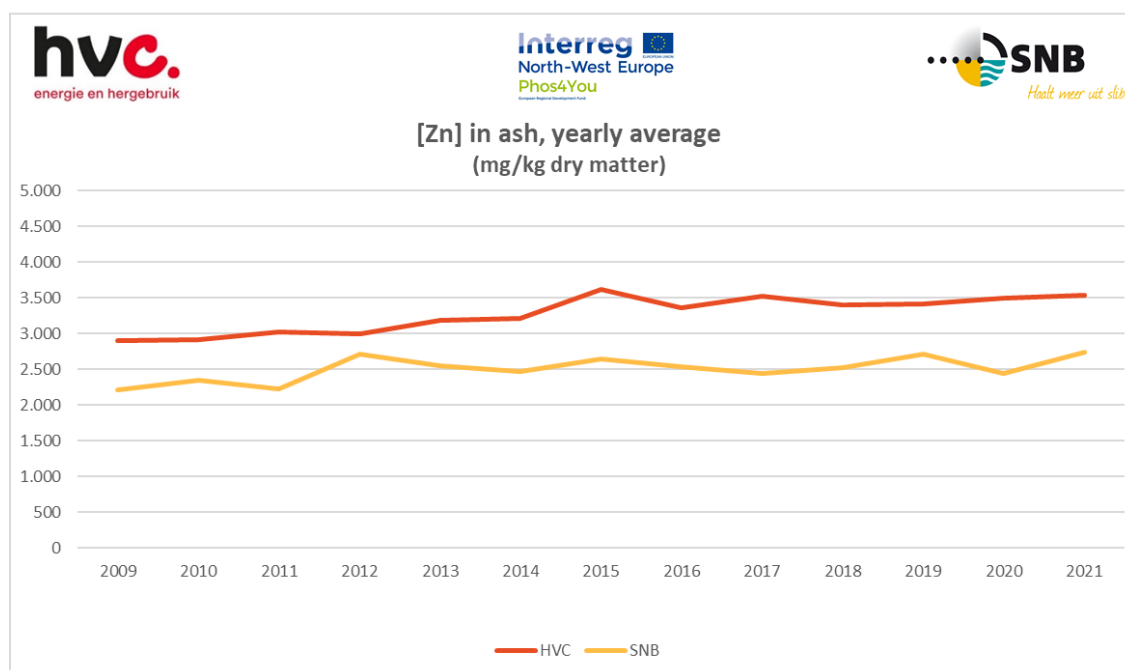
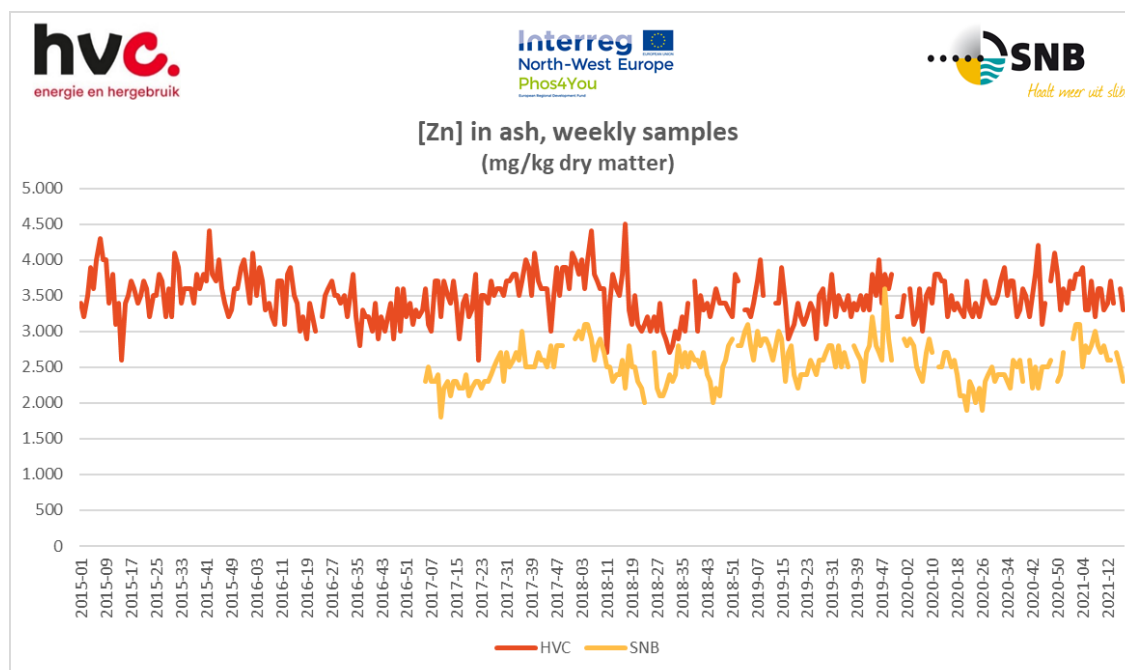


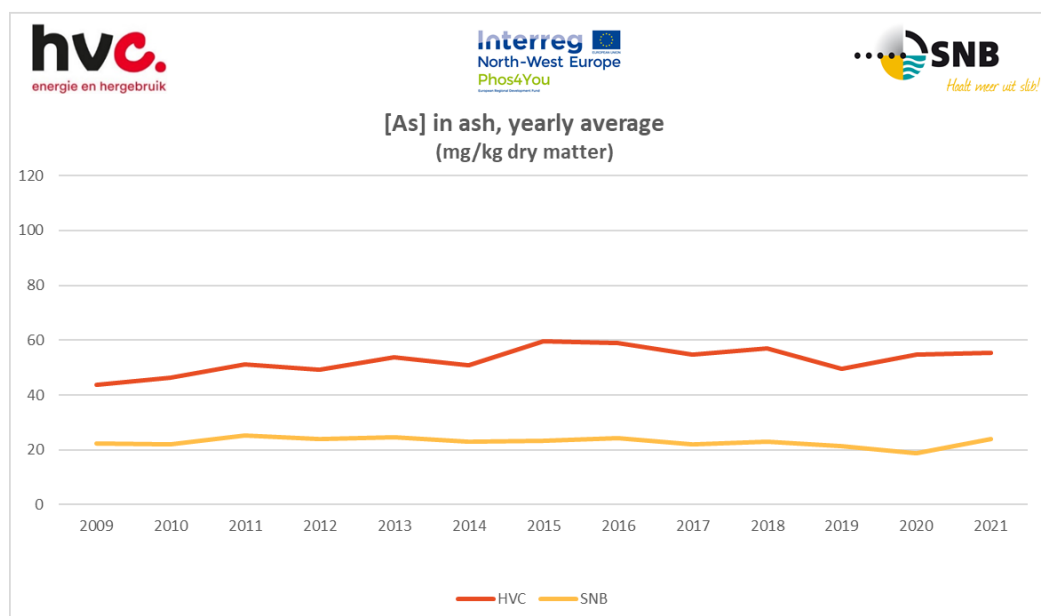
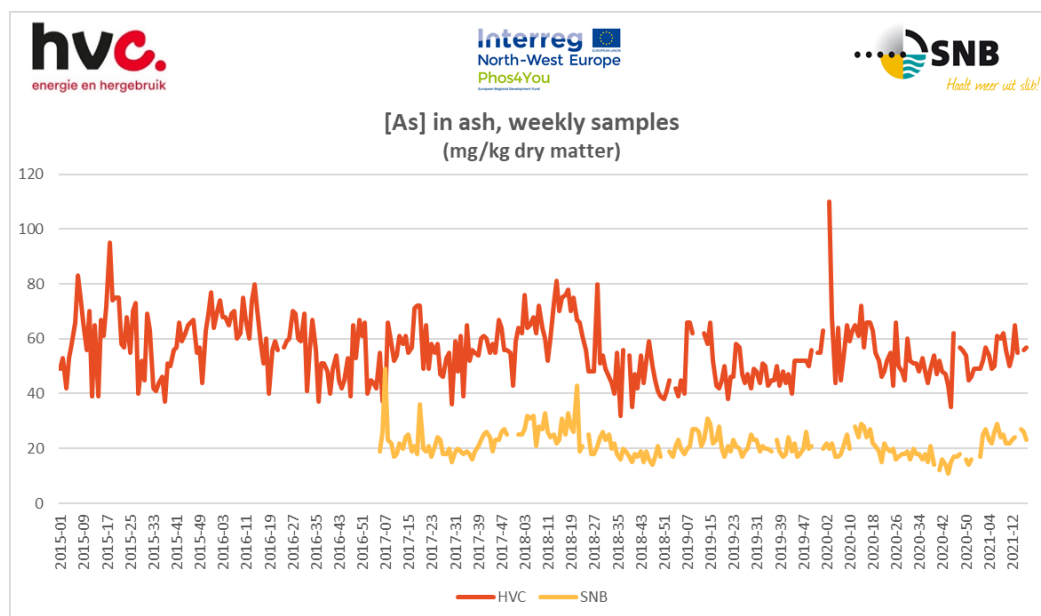


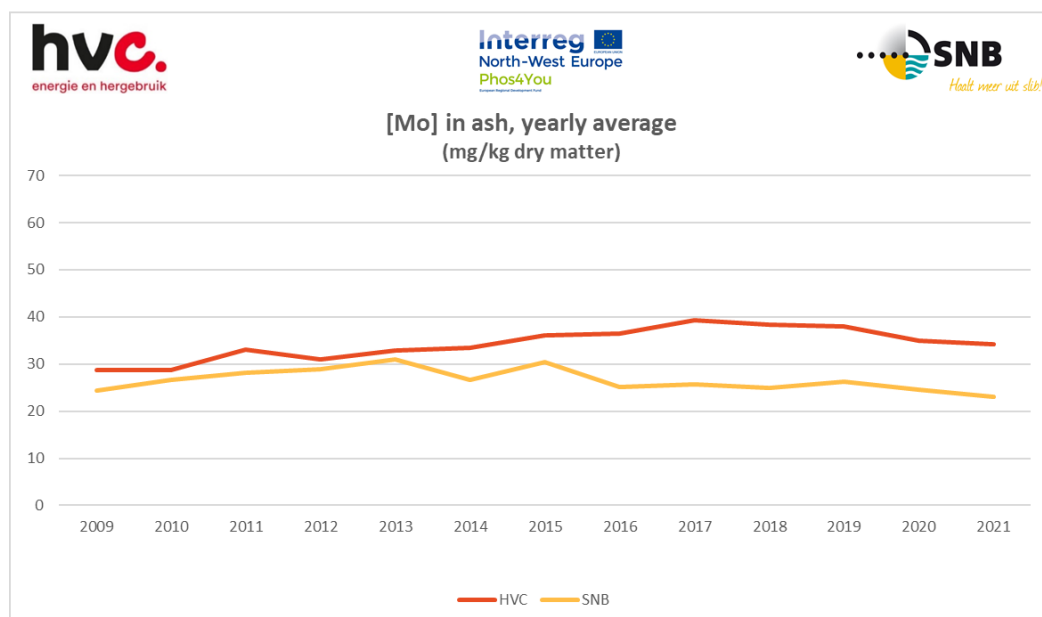
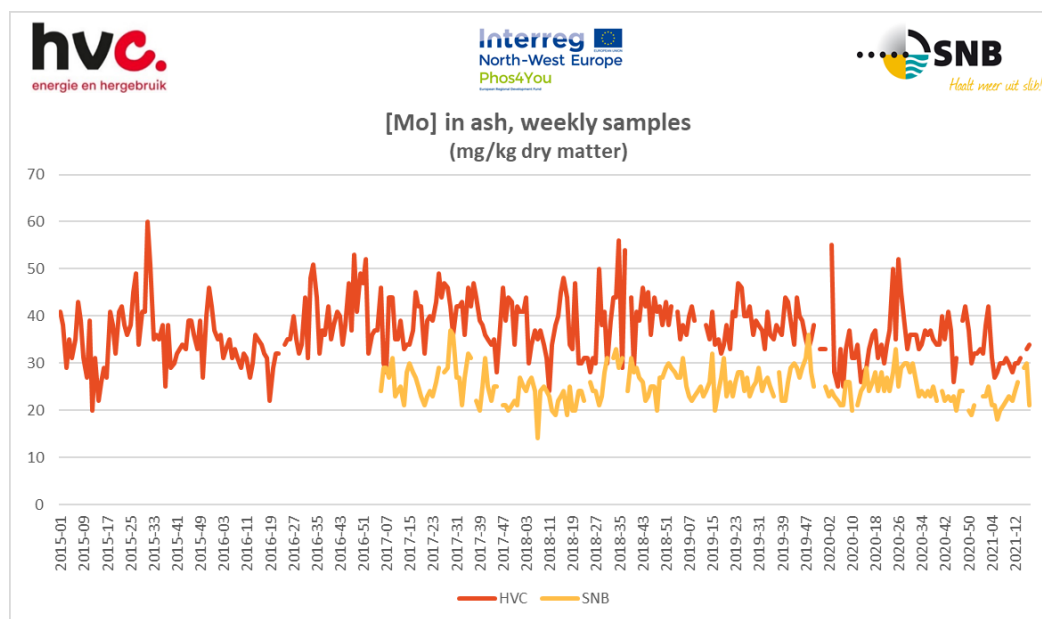


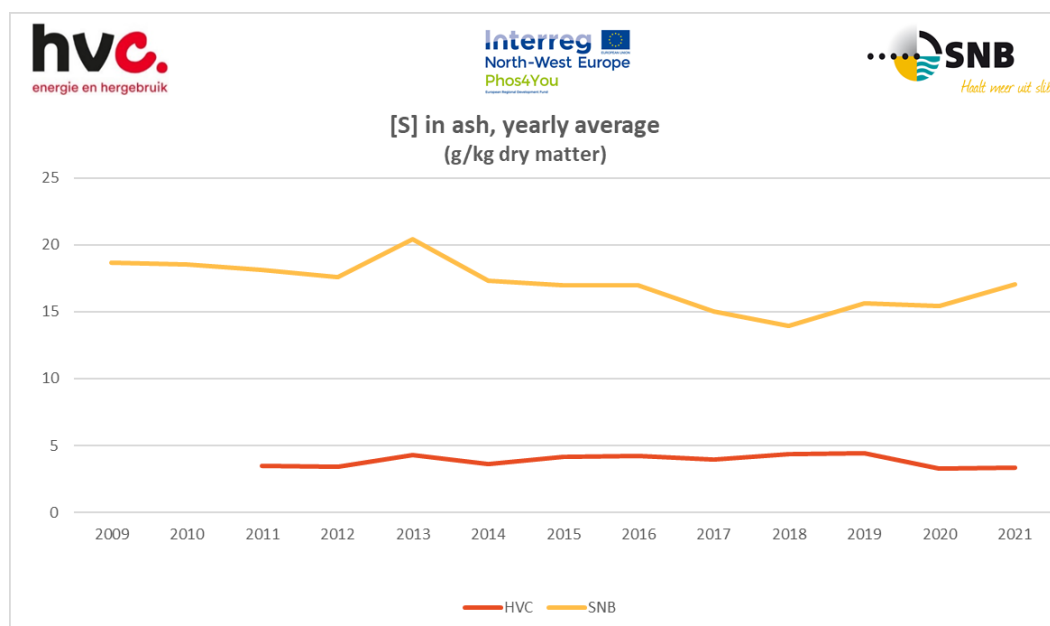
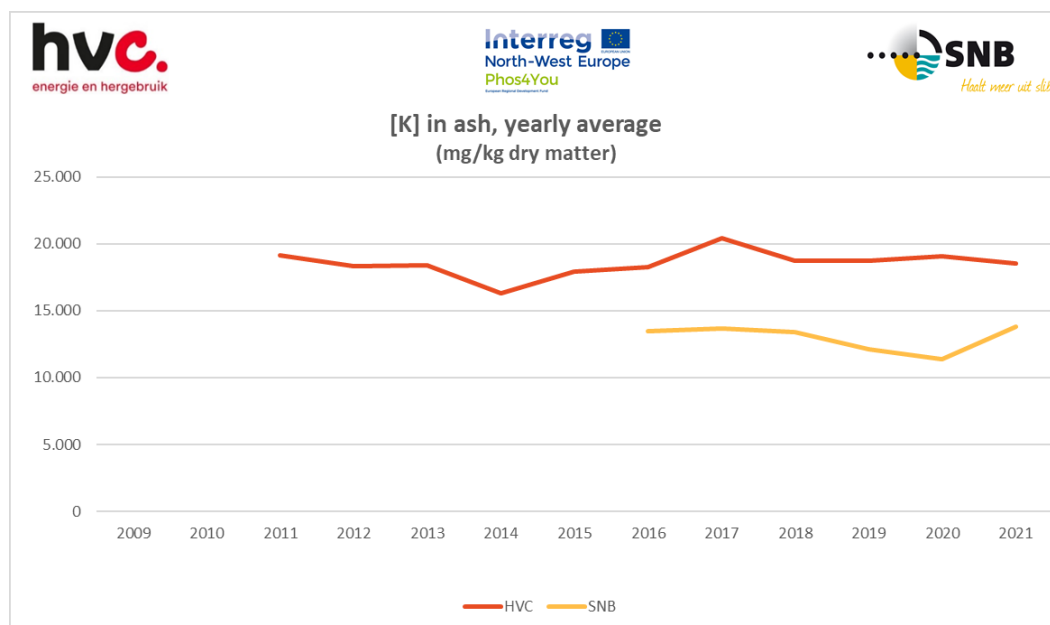












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