

## Dorota Richards

---

**Subject:** FW: Objection to PD Licence Reg No. W0082-03  
**Attachments:** PD Objection Reg No W0082-03 26th January 2015 .pdf

-----Original Message-----

From: Jim O'Callaghan [<mailto:jim@ocallaghanmoran.com>]  
Sent: 26 January 2015 13:13  
To: Licensing Staff  
Cc: Malcolm Dowling  
Subject: Objection to PD Licence Reg No. W0082-03

Dear Sir/Madam,

I attach, on behalf of the applicant Starrus Eco Holdings Ltd, an objection to the Proposed Decision. The application fee has been paid by means of credit card, please refer to Ms Noleen Keavey

Regards,

Jim O'Callaghan

O'Callaghan Moran & Associates  
Environmental & Hydrogeological Consultants

Tel: 021 4321521  
Fax: 021 4321522  
Email: [jim@ocallaghanmoran.com](mailto:jim@ocallaghanmoran.com)  
Web: <http://www.ocallaghanmoran.com>

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

DISCLAIMER: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Although the company has taken reasonable precautions to ensure no viruses are present in this email, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---

Granary House  
Rutland Street  
Cork



Tel. (021) 4321521

Fax. (021) 4321522

**Objection To**  
**Proposed Decision**  
**Waste Licence Register No: W0082-03**

**Prepared For: -**

Starrus Eco Holdings Limited (Greenstar)  
Ballykeefe,  
Dock Road,  
Limerick

**Prepared By: -**

O' Callaghan Moran & Associates,  
Granary House,  
Rutland Street,  
Cork.

**January 2015**

email: [info@ocallaghanmoran.com](mailto:info@ocallaghanmoran.com) Website: [www.ocallaghanmoran.com](http://www.ocallaghanmoran.com)

O'Callaghan Moran & Associates. Registration No. 8272844U

---

## TABLE OF CONTENTS

---

	<u>PAGE</u>
1. INTRODUCTION.....	1
2. GROUNDS FOR OBJECTION.....	2

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

---

## 1. INTRODUCTION

---

The applicant, Starrus Eco Holdings Limited (Greenstar), wishes to object under Section 42 of the Waste Management Acts, 1996 as amended, to a number of the Conditions and Schedules in the Proposed Decision (PD) for Waste Licence Register Number W0082-03 for its installation at Dock Road, Limerick.

Section 2 contains the grounds for the objections. The actual Conditions are presented in italics followed by Greenstar's grounds for objection. The appropriate fee for the objection (€500) has been electronically transferred to the Agency.

*For inspection purposes only.  
Consent of copyright owner required for any other use.*

---

## 2. GROUNDS FOR OBJECTION

---

### **Condition 3.14.5 Security Fencing around Civic Amenity Area**

*The licensee shall, within three months of the date of grant of this licence, install and maintain security fencing around the Civic Amenity Area which shall prevent access by the general public to the remaining area of the installation.*

Greenstar has recently installed new barriers at the facility to prevent unauthorised access to the operational areas and considers that further security fencing is not required. However Greenstar recognises the need to ensure the separation between the civic amenity area and the operational area and the need for on-going review of site security. Therefore Greenstar requests that *“unless otherwise agreed with the Agency”* be inserted at the end of the Condition.

### **Condition 3.18 Weighbridge and Wheel Cleaners**

*3.18.1 The licensee shall maintain a weighbridge and provide and maintain wheel cleaners at the installation.*

There is a truckwash at the installation, which can be used to clean vehicles when required. The washwater will be directed to the trade effluent network or shall be a zero discharge recycling system. Greenstar considers that there is no need to provide additional wheel cleaners and requests that the reference to wheel cleaners be changed to the truckwash area. Greenstar also requests that the wording in Conditions 13.18.2 and 13.18.3 be amended to refer to the truckwash.

### **Condition 3.19 Wastewater Management and Stormwater Drainage**

*Condition 3.19.1 Within six months of the date of the grant of this licence, all waste water and stormwater arising:*

- *within the waste buildings*
- *from outdoor waste storage and holding areas other than areas used solely for the storage of baled waste, and*
- *from staff welfare facilities*

*shall be discharged to sewer or stored pending transport off-site in fully enclosed road tankers to a wastewater treatment plant*

**Condition 3.19.4** *Within six months of the date of grant of this licence, the wastewater treatment plant shall be taken out of use and decommissioned*

The requirement to connect to the foul sewer is also a condition of the planning permission (Ref 13/300). Condition 2 stipulates that *"The existing on site waste water system shall be decommissioned when the connection to the Limerick Main Drainage Scheme has been commissioned"*. In this instance the decommissioning of the on-site waste water system is directly linked to the completion of the connection to the foul sewer.

Greenstar's landlord is progressing the connection to the foul sewer and is dealing directly with Irish Water on this matter. It was Greenstar's understanding that work on the installation of the new sewer connection would begin in Q3 2014, but this has not happened though it is understood that the application is advanced and currently under consideration by Irish Water. The objective remains to get the connection as soon as possible, but as Greenstar is not responsible for arranging the connection, there is no certainty over the timelines. If the connection is not completed within 6 months of the date of the grant of the licence, this Condition requires Greenstar to shut down the on-site wastewater treatment plant and tanker the wastewater from the site.

As there is no evidence the operation of the wastewater treatment plant is having an adverse impact on groundwater and taking into consideration the requirements of the planning permission, Greenstar considers, in the context of the lack of certainty over the timing of the connection, which is outside of Greenstar's control, that 'unless otherwise agreed' be inserted at the end of Conditions 3.19.1 and 3.19.4.

**Condition 3.28.5** *The Licensee shall maintain and implement a programme to demonstrate negative pressure and building envelope integrity throughout all buildings where residual, food or other odour-forming waste is deposited, stored or treated to ensure that there is no significant escape of odours. The programme shall maintain all criteria for the operation and control of negative pressure. This programme shall be reviewed at least annually.*

This condition is linked to the provision of a negative air pressure system at the installation as required under Condition 3.28.4. However provision of this system is not mandatory and Greenstar requests that, similar to Condition 3.28.4, the wording '*Unless otherwise agreed*' be inserted at the beginning of the Condition.

#### **Condition 4.3 Noise**

*Noise from the installation shall not give rise to sound pressure levels (LAeq, T) measured at the boundary of the installation which exceeds the limit value(s).*

Greenstar considers that the limit values should apply to nearest noise sensitive locations and not the site boundary. This is consistent with Note 1 of Schedule B4.

#### **Condition 5.7 Emissions to Sewer**

This Condition appears incomplete.

**Condition 8.10** *All waste treatment shall be carried out inside buildings*

Attachment D1 of the application states that 'Up until 2012, untreated timber pallets and untreated construction timbers were shredded in the northern area of the yard and stored in a dedicated shredded timber bay before being sent for use as a compost bulking/aeration agent, or as raw material in chipboard/MDF manufacturer. This activity has ceased, but may restart in the future.' In this context, Greenstar requests that the Condition be amended to include the words '*Unless otherwise agreed with the Agency*'

**Condition 8.13.2** *Each bale shall be labelled with:*

*its date of production,*

*its content and EWC code and*

*the name of the facility and its licence register number (W0082-03)*

Greenstar considers the requirement to label each bale is onerous and does not serve any useful purpose. Given the nature of the waste, there will not be any significant difference in the contents between bales. Each shipment will be accompanied by the relevant TFS documents that specify the content of the bales and the EWC Code. Given the manner in which the bales will be stored at the facility, on the transport vehicles and in the ships, it will not be possible to inspect each bale to confirm the presence of the labels. Greenstar is in favour of providing for the labelling of the first bale processed each day at the facility.

**Condition 12.1** *Agency Charges*

The proposed annual contribution is €14,998 and is based on the predicted enforcement effort. Greenstar considers this to be onerous given the significant improvements at the installation, which is reflected by the achievement of ISO 14001 and OHSAS 18001 certification, the lack of any third party complaints in 2014 and the RBME Category. The Inspectors Report notes that the OEE has confirmed there have been no complaints in recent times and no significant enforcement actions. Greenstar requests the Agency review the predicted level of enforcement that will be required in light of annual contributions associated with other recent proposed determinations.

**Schedule C.1.2** *Monitoring of Storm Water Discharges*

The Schedules specifies weekly monitoring of pH, COD, BOD, Total Ammonia, Total Nitrogen, Total Organic Carbon and Conductivity that must be carried out at emission point FE-1A.

The only emission to surface waters will be rainwater run-off from the 'clean area; which will comprise the building roofs and the yard in the south-east of the site. This is regulated by Condition 13.9.2, which requires that only stormwater run-off from areas that are not used for the storage or holding of wastes or other material that has the potential to contaminate rain-water and surface water run-off can discharge at FE-1A.

Greenstar considers that weekly monitoring for the range of parameters specified is not warranted, unnecessary and will result in significant additional costs and requests the frequency be reduced to quarterly in line with existing Licence.

Greenstar requests a similar amendment to the monitoring frequency specified in Schedule C.4.2.

For inspection purposes only.  
Consent of copyright owner required for any other use.