



greenstar

setting the standard

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Ms. Michelle Reddy  
Licensing Inspector  
Office of Environmental Sustainability  
Environmental Protection Agency  
Johnstown Castle Estate  
Wexford

10th May 2016

**Re: Proposed Technical Amendment to licences W0183-01, W0053-03, W0136-03, W0082-03 & W0058-01**

Dear Ms. Reddy,

In response to your letter of April 12<sup>th</sup>, pertaining to a proposed Technical Amendment (with respect to fire risk and waste storage) of the licences referenced above, Starrus Eco Holdings Ltd t/a Greenstar would like to make the following submission.

- Waste Storage Plan (x.1.6) should reference wrapped bales (MSW/RDF/SRF) only and not various grades of recyclables which are also baled;
- Wrapping of baled municipal waste (x.1.2) - while every effort can be made to ensure a full batch of bales is dispatched from site during each boat loading it is not operationally feasible to stipulate that the bales are loaded in order of production;
- Wrapping of baled municipal waste (x.1.4) – it is not operationally feasible to inspect the integrity of each individual bale once they are stacked. The bale storage area can be inspected for leachate and the integrity of the outer bales observed regularly;
- Condition (xx) Accident Prevention & Emergency Response – reference to guidance documents should be expanded to allow for other relevant docs such as the WISH Forum document “Reducing Fire Risk at Waste Management Sites” to be referenced also;
- Timeline for implementation – the final implementation of each Waste Storage Plan make take longer than 6 months to implement especially if the independent Fire Risk Assessment report highlights infrastructural changes on sites. *Also the timeline for all amended licences will begin simultaneously meaning that Greenstar’s EHS team will have five plans to formulate simultaneously which may also lead to delays;*



Starrus Eco Holdings Ltd (T/A Greenstar)  
Registered in Ireland No. 527552

Directors: R. Bolger, M. Burrows Smith (UK),  
S. Mayer (US), L. Strong (UK)  
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Greenstar also attended a meeting between the Agency and the IWMA at your offices on May 5<sup>th</sup> where a number of points were raised in relation to this proposed Technical Amendment. We welcome the proposed fire risk assessment guidance note that the Agency is working on.

Should you have any queries I can be contacted at [sara.smyth@greenstar.ie](mailto:sara.smyth@greenstar.ie) or on 01 274 6236.

Yours sincerely,

Sara Smyth

Group Environmental Engineer

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