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Mr David Naughton
Group Environmental Manager
Starrus Eco Holding Limited
Greenstar
Millennium Business Park
Ballycoolin
Dublin 11

26th June 2017

Reg. No: W0183-02

Dear Mr Naughton,

I refer to your application for a licence review.

I am to advise in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, that the following information is required in support of the application under Regulation 9 of the Regulations:

1. *Waste acceptance and operational hours.*

- Planning Permission PL 06f.202468 and the EIS note that the installation will accept waste between 6.30 and 20.00 Monday to Saturday; that operational hours will be 07.00 to 19.00; and that waste will not be removed from the facility after 19.00.
- The Non-Technical Summary describes the current operational hours as 24 hours/day Monday to Sunday inclusive.
- Section C.3 refers to waste acceptance hours of 06.30 – 19.00 Monday to Saturday; operational hours of 6.00 to 20.00 Monday to Saturday; and that the installation does not operate on Sundays or Bank holidays, as per existing licence.

Clarify the proposed periods for waste acceptance and operation at the installation.

Note: All *written communications and replies* should be directed to Dorota Richards, Office of Environmental Sustainability, EPA, PO Box 3000, Johnstown Castle Estate, County Wexford.

2. The application states that it is proposed to provide capacity at the installation for the acceptance and treatment of incinerator bottom ash (IBA), commercial & industrial waste, construction & demolition waste and municipal solid waste. Drawing number 1 indicates that the building will have two internal treatment areas.
 - a. Provide a drawing which clearly indicates, for each waste stream, the proposed location of all waste acceptance, treatment and storage areas.
 - b. Clarify whether it is proposed to proceed with the construction of the Biowaste Treatment Building. If this building is proposed to be constructed include its location as part of the above drawing.
 - c. Provide a copy of the waste storage plan for the installation. State the maximum amount of waste that can be stored in each area of the installation.
3. *Air handling systems and emissions to air.*
 - Licence Register No. W0183-01 does not authorise emissions to air from the material recovery building.
 - The application notes that an internal wall will be raised to roof level to ensure the IBA treatment area is fully separated from the rest of the building.
 - Drawing number 1 indicates that a dust filter is associated with the building and drawing number 2 shows a dust control system.
 - Drawing number 3 indicates the location of air emission point A2-1.
 - a. State whether the Material Recovery Building will require emission points.
 - b. State whether there are stacks associated with the emissions points and if they are authorised by the planning authority.
 - c. Describe the source within the building of any channelled emissions and describe the manner by which the emissions are extracted and directed outside.
 - d. Provide a characterisation of any proposed emissions from the proposed processes in the building, to include concentration of relevant parameters and flow rates. Describe any techniques used in accordance with BAT to mitigate the emissions and ensure no environmental pollution is caused.
 - e. Provide an air dispersion model to address any channelled emissions from the proposed activities at the installation. Also provide an odour dispersion model to address any channelled emissions from a source that includes food, residual or odour-forming waste.
 - f. Describe proposed dust mitigation methods to minimise fugitive dust emissions from the IBA treatment area; in particular during the unloading of vehicles in this area.
4. Attachment D.2 of application form provides the List of Waste codes proposed for acceptance at the installation.
 - a. Provide a description of each treatment process into which wastes from each List of Waste Chapter (e.g. 01, 02, 03) will be accepted and where the treated waste outputs are destined for once they're dispatched from the installation.
 - b. In the context of Table A.1 of the existing licence (W0183-01) provide a revised list of waste and quantities proposed to be authorised at the installation in a revised licence.

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5. Provide a comprehensive review for the Reference Document on the Best Available Techniques for Waste Incineration, August 2006 in relation to the treatment of non-hazardous incineration ash.
6. Include details of the technical knowledge and/or qualifications of relevant employees at the installation as required by section C.4 of the application form.
7. In accordance with Section 83(6) of the EPA Act 1992, as amended:
 - a. Prepare a revised, fully detailed and costed Closure, Restoration and Aftercare Management Plan (CRAMP) for the installation as a whole, and to include the proposed activity.
 - b. Provide a revised, fully detailed and costed Environmental Liabilities Risk Assessment (ELRA) which addresses the liabilities and potential liabilities from the past and proposed activities, including those liabilities and costs identified in the CRAMP.
 - c. Provide a proposal for financial provision to cover any liabilities associated with the operation and identified in the CRAMP and ELRA.

The preparation of the CRAMP and ELRA and evaluation of the amount and form of financial provision should have regard to EPA guidance including the *Guidance on Assessing and Costing Environmental Liabilities* (EPA, 2014) and the *Guidance on Financial Provision for Environmental Liabilities* (EPA, 2015).

8. Provide an assessment of the predicted noise impact from the operations proposed at the installation.
9. Confirm if relevant hazardous substances are proposed to be used, produced or released at the installation. If yes, complete a baseline report in accordance with section 86B of the EPA Act 1992, as amended.
10. Complete the following tables of the application form: E.2 (i) Emission Details, E.2(ii), E.3(i) Emission Details, E.5(i), F.1(i) and G.1(ii).

In addition to the above please also provide an updated non-technical summary to reflect the information provided in your reply.

The requested information should be submitted to the Agency within **eight weeks** of the date of this notice, in order to allow the Agency to process and determine your application.

In the circumstances, you should make arrangements to have the required documents (1 signed original and 1 copy in hardcopy format, and 2 copies of all files in electronic searchable PDF format on CD-ROM) submitted to the Agency. Your response to this request should be directed to Dorota Richards, Administration Officer, Office Environmental Sustainability.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact Ms Caroline Murphy at the number above.

Note: All **written communications and replies** should be directed to Dorota Richards, Office of Environmental Sustainability, EPA, PO Box 3000; Johnstown Castle Estate, County Wexford.

Yours sincerely,

Caroline Murphy

Caroline Murphy
Environmental Licensing Programme
Office of Environmental Sustainability

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