



Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire

T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

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

12th Sep. 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. An Bord Pleanála's Inspector's Report regarding Planning Permission PL 06f.202468 states that *"The facility will accept waste between 6.30 hours and 20.00 hours Monday to Saturday. Operational hours will be 07.00 hours to 19.00 hours. Waste will not be removed from the facility after 19.00 hours"*. Condition 1 of the most recent planning permission for the installation F08A/0981 states that the proposed development shall strictly comply with the conditions of An Bord Pleanála under PL 06f.202468.
 - a. Provide evidence that the scope of the installation's planning permission covers 24-hour operation 7 days a week.
2. A drawing indicating the waste storage plan was submitted in the additional information received on the 18th July 2017. This drawing doesn't demonstrate the potential maximum storage capacity of IBA at the facility. Please provide a waste storage plan which demonstrates the maximum IBA waste storage capacity in Area 2.

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.

3. Confirm whether it is proposed to carry out treatment method (a), (b) and/or (c) as listed in BAT Conclusion No. 53 of the Waste Incineration BREF¹. Provide information which includes:
 - a. a description of the selected treatment process(es);
 - b. clarification of how the selected treatment(s) meets BAT;
 - c. a description of the controls in place regarding dust, odour and accident prevention due to the risk of potential ignition;
 - d. the maximum length of time a stockpile will remain in Area 2 when undergoing this treatment; and
 - e. the name of any proposed facility for where this treated waste is destined; and
 - f. the waste acceptance specification for any end-destination facility.
4. IBA has the potential for dust and odour generation. In the Waste Incineration BREF, Sections 4.6.6 and 4.6.7 *Cross Media Effects* state that dust controls may be required. The potential impact from dust is increased by the number and types of treatments proposed to take place within Area 2. Provide information regarding:
 - a. the proposed air extraction and treatment system from Area 2 and/or the entire building;
 - b. Air Dispersion Modelling on the emission point to atmosphere (A2-1);
 - c. the planning permission for the abatement system and associated stack from the waste treatment building; and
 - d. whether the emissions from the dust filters currently *in situ* will form part of the emission from A2-1.
5. The baseline report provided did not identify the *relevant* hazardous substances at the installation and whether these substances have been identified in the soil and groundwater beneath the installation. The Decommissioning Plan states that there is no evidence of any significant contamination that would require remedial works. Please confirm if you consider:
 - a. diesel, engine oil and lubricating oil to be the only relevant hazardous substances at the installation; and
 - b. that the installation will be returned to greenfield status upon closure.
6. Clarify if the IBA processing area is required to comply with the *Safety, Health and welfare at work (Explosive Atmospheres) Regulations 2003*. If these regulations are relevant:
 - a. State how they will be complied with in order to prevent accidents;
 - b. Provide an updated ELRA which includes the risk from explosion.

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.

¹ Reference Document on the Best Available Techniques for Waste Incineration (August 2006).

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.

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.

Yours sincerely,



Caroline Murphy
Environmental Licensing Programme
Office of Environmental Sustainability

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.