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Mr. David Naughton

On behalf of Starrus Eco Holdings Limited

09 April 2019

Reg. No.: W0183-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Starrus Eco Holdings Limited for an installation located at Starrus Eco Holdings Limited (Millenium Business Park), Millennium Business Park, Grange, Ballycoolin, Dublin 11, Dublin

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 01 March 2017.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above-mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

1. In relation to your letter dated 7th December 2018 regarding the requested update to the submitted Environmental Impact Statement, the Agency makes the following comment. Having regard to Section 83(2A) of the EPA Act 1992, as amended, the Agency has determined that EIA, as respects the matters that come within the functions of the Agency, is required for the activity to which the above licence application relates. Having considered the information provided by the applicant, it has been determined that the activity exceeds the following threshold in Schedule 5, Part 2 of the Planning and Development Regulations 2001, as amended, and is likely to give rise to significant effects on the environment by virtue of its nature, size and location:

11 (b) Installations for the disposal of waste with an annual intake greater than 25,000 tonnes not included in Part 1 of this Schedule

The Agency requests that the Environmental Impact Statement is updated to meet the requirements of an Environmental Impact Assessment Report in accordance with the 2014 EIA Directive.

2. The Agency notes that the planning permission granted in October 2018 (Ref. FW18A/0079) provides for the construction of a waste recovery/transfer building to replace the previously authorised biowaste building and details that the proposed development is for the processing of dry recyclable materials. Confirm if the following class of activity is therefore still required as part of this licence review application in accordance with regulation 9(2)(c):

Class 11.4(b) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply):

- (i) biological treatment;

3. Clarify if the proposed development as detailed in planning permission FW18A/0079 is to form part of this licence review application. If yes, in accordance with regulation 9, provide the following:
 - a. The activity classes to be carried out as a result of the proposed development,
 - b. The quantity and nature of the waste materials to be accepted (including List of Waste Codes),
 - c. A detailed description of the waste treatment process to be carried out,
 - d. Details of any potential emissions arising as a result of the activity,
 - e. Details of any abatement, recovery and treatment systems for the potential emissions identified in 3.d. above, and
 - f. A drawing which clearly indicates the proposed location of all waste acceptance, treatment and storage areas.

4. Confirm if the following class of activity, as listed in Section B.3. of the application form and contained within the newspaper and site notice, are required as part of this licence review application in accordance with regulation 9(2)(c):

Class 11.4(b) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Waste Water Treatment Regulations 2001 (S.I. No. 254 of 2001) apply):

 - (i) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

5. As per your letter dated 7th December 2018, the submitted drawing does not provide the requested detail regarding waste storage quantities. Please state the maximum quantity of all wastes that will be held or stored at the installation at any one time. This should include waste in reception, inspection, treatment, storage and quarantine areas. Provide an updated drawing to reflect the storage areas and state the maximum amount of waste that can be stored in each area of the installation.

6. In the event of leachate generated from the received "damp" IBA, the use of water to dampen piles and in the event of the future additional step of drying, provide details of how leachate will be collected, stored and disposed of at the installation.

7. Confirm the type and maximum quantity of fuel to be stored in the truck fuelling area. Provide the equivalent details of any other fuels stored on site excluding the diesel required for the back-up generator.

8. Provide evidence to support the classification of the IBA as non-hazardous waste and provide the List of Waste classification code for the IBA.

9. Provide written confirmation from the Millennium Business Park Management Company on the current status of the surface water sewer along with a timeline for corrective actions if the issue that occurred with the drainage system in 2013 is still not resolved.

10. In relation to Licence Application Attachment E.1, Point Emissions to Atmosphere, clarify/confirm the following:

- a. Section 4 of correspondence dated 7th December 2018 states that provision has been made for the installation of an odour control system adjacent to the dust suppression while Attachment E1 states provision for the odour control unit is made downstream of the dust filter. Clarify if the odour control unit is a separate system to the dust filter resulting in two emission points or an integrated system with one emission point.
 - b. Clarify where the treated air emissions will be emitted to, after treatment in the odour control unit, in the event treatment is required for odour from the IBA.
 - c. Confirm if the odour control unit provision for the IBA will be a separate system to that identified for the Municipal Waste Area as per Condition 3.15.1 (ii) in existing licence W0183-01.
 - d. Update Drawing No.3 to show the emission points for both odour control units (if separate system to the Municipal Waste Area) in the event abatement measures including air extraction and filtration are required as per Condition 3.15.1 (ii) in existing licence W0183-01.
11. In relation to Licence Application Attachment F.1, Treatment, Abatement and Control Systems, provide/confirm the following:
- a. Provide details of what stages in the IBA treatment process, and the relevant location areas within the building, dust will be extracted from utilising the proposed recommissioned dust extraction system.
 - b. Provide a characterisation of the air emissions to be treated and emitted from the dust extraction system.
 - c. Confirm if the outlet for the recommissioned dust extraction system will be emission point A2-1 as shown on Drawing No.3.
 - d. Confirm the maximum flow rate of the air emission to be emitted from the dust filter unit of the dust extraction system.
12. Provide details of the measures used to mitigate the noise emissions from processing the IBA from the noise sources identified in Attachment E5 and from the proposed dust extraction system.

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within 10 weeks of the date of this notice, in order to allow the Agency to process and determine your application.

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 licensing@epa.ie.

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at <http://www.epa.ie/pubs/forms/lic/industrial%20emissions/licenceapplicationformguidance.html>.

Please direct any queries to licensing@epa.ie.

Yours faithfully,
Environmental Licensing Programme
Office of Environmental Sustainability
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