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Environmental Licensing Programme,
Office of Environmental Sustainability,
Environmental Protection Agency,
Headquarters PO Box 3000,
Johnstown Castle Estate.
County Wexford.

10th September 2019

Re: Application for Licence Reg No: W0183-02

To whom it concerns,

I refer to the licence review application made by Starrus Eco Holding Ltd (SEHL) relating to the acceptance and processing of 130,000 tonnes of Incinerator Bottom Ash (IBA) annually.

At the time of the application SEHL's preferred location for processing the IBA was at its installation at Beauparc, County Meath (Reg. No. W0140-04). However due to legal uncertainty arising from a judicial review (JR) of the Agency's grant of the licence taken by a third party SEHL, as a precautionary measure and as discussed in advance with the Agency, submitted review applications for both the Beauparc and Millennium Business Park installations.

The issue of JR has been settled and the Agency has made a proposed decision (PD) on the Beauparc installation's application (Reg. No. W0140-05). SEHL has objected to a number of the proposed licence conditions on technical grounds and it is understood that the Agency will make a decision on this in the coming weeks. In these circumstances there is no longer a need to accept the IBA at the Millennium Business Park installation. It has also been decided not to proceed with the biowaste treatment.

In July 2019, in response to the Department of Communications, Climate Change and Environment's circular in relation to the need for additional residual Municipal Solid Waste and Construction & Demolition waste recycling/recovery capacity, SEHL requested the Agency's approval to incorporate an increase in the waste acceptance rate into the review application and stated that an environmental impact assessment (EIA) would be completed. SEHL intends to proceed with application to increase the waste acceptance rates, but due to more pressing circumstances has decided that this will be the subject of a separate licence review application.

In June 2018, the Agency approved an SEHL Article 28 application in relation to the processing of waste low density polyethylene (LDPE) film to manufacture pellets that meet end of waste (EoW) criteria¹. SEHL subsequently began looking for a suitable location for this activity, with the intention of applying for planning permission, if required, a waste permit and a trade effluent discharge licence. SEHL also completed the detailed design of the processing plant and placed an order with manufacturers based in Italy and Austria. The plant, which will have a capacity to treat 15, 000 tonnes of LDPE film annually, is scheduled delivery in January 2020.


SEHL expected to secure a standalone location for the operation by Q1 of 2019 and procure the planning permission, waste permit and trade effluent discharge licence by the end of Q4. However, the manufacturing process has a significant energy requirement (3.3 MW) and due to a combination of constraints in the national grid and commitments already entered into by Eirgrid to other planned developments that will be significant power consumers, SEHL has been unable to find a suitable location.

In these circumstances SEHL proposes to install the plastics recycling plant at the Millennium Business Park installation. The existing power supply can meet the plant's energy requirements, the planning permission approves plastic recycling and there is already an authorised emission to foul sewer. While locating the plant at the installation will involve a temporary disruption of operations, SEHL considers this to be the only way by which the much needed plastics recycling capacity can be delivered in the short term.

The installation of the plastics plant requires the relocation of the skip segregation operation to the new building for which planning permission was obtained in October 2018. This will not result in any new waste processes, new emission points or changes to the types or quantities of waste accepted. It will comprise a Specified Engineering Works and details will be submitted to the Office of Environmental Enforcement for its approval in accordance with Condition 3.2 of the current licence.

As the proposals not to proceed with the IBA acceptance and processing, not construct the biowaste treatment and to locate the plastics recycling plant at the installation are significant changes to the original review application SEHL will publish new public notices and erect a new site notice.

Yours Sincerely


Jim O' Callaghan

¹ <https://www.epa.ie/pubs/advice/waste/waste/endofwastecriteria.html>