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Mr. David Naughton

On behalf of Starrus Eco Holdings Limited

18 September 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, Co. Dublin

Dear Mr Naughton,

I refer to the application for a licence received by the EPA on 01 March 2017 and the EPA's notice of 09 April 2019 requesting further information in respect of your licence review application. In addition, the Agency has examined the licensee's response to the EPA's notice submitted on 25 July 2019 and the unsolicited correspondence submitted on 11 September 2019.

The correspondence submitted on 11 September 2019, indicates the licensee's intention to no longer pursue waste acceptance of incinerator bottom ash (IBA) as part of this licence review application, and that a decision has been made not to proceed with the treatment of biowaste at the installation. Subsequently, reference is made to the licensee's previous correspondence submitted on 25 July 2019 regarding a proposal to increase the licensed waste acceptance capacity to 400,000 tonnes per annum. The Agency notes the licensee's intention to submit a separate licence review application to increase the waste acceptance rates, rather than pursue this change under this licence review application. The licensee's intention in relation to the installation of a plastics recycling plant at the installation through a submission to the Office of Environmental Enforcement for its approval in accordance with Condition 3.2 of the existing licence (Reg. No. W0183-01), is also noted by the Agency.

Provided the above understanding is in line with your intentions, please state the grounds on which the existing licence review application (Reg. No. W0183-02) is now being made [Regulation 9(3)(a)] or if it is the licensee's intention to withdraw the licence review application under Regulation 19(1) of the above mentioned legislation.

If it is the licensee's intention to proceed with the existing licence review application, please confirm the following:

- a. The activity class or classes to be carried out. [Regulation 9(2)(c)]
- b. The quantity and nature of the waste materials to be accepted (including List of Waste Codes). [Regulation 9(2)(t)]

- c. A detailed description of the waste treatment process to be carried out. [Regulation 9(2)(g)]
- d. Details of any potential emissions arising as a result of the activity. [Regulation 9(2)(i)]
- e. Details of any abatement, recovery and treatment systems for the potential emissions identified in d. above. [Regulation 9(2)(g)]
- f. A drawing which clearly indicates the proposed location of all waste acceptance, treatment and storage areas.

In addition, supply the information detailed below to demonstrate compliance with the above mentioned legislation:

1. In relation to your letter submitted on 07 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. [Regulation 9(2)(k)]

2. Clarify if the proposed development as detailed in planning permission FW18A/0079 relates to the licensee's intention, in correspondence submitted on 11 September 2019, to install a plastics recycling plant at the installation. If not, confirm whether this planning application is to form part of this licence review application. [Regulation 9(2)(e)]
3. Confirm the type and maximum quantity of fuel to be stored in the truck fuelling area identified in application form attachment D1 Drawing 1. Provide the equivalent details of any other fuels stored on site excluding the diesel required for the back-up generator. [Regulation 9(2)(f)]
4. 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. [Regulation 9(2)(i)]

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIAR 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 **eight 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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