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Mr. David Naughton

Ms. Siobhan Kelly

On behalf of Starrus Eco Holdings Limited

06 July 2023

Reg. No.: W0261-03

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 (Cappagh), Cappagh Road, Finglas, Dublin 11, Dublin, D11 NP68

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 09 November 2021.

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. Odour Dispersion Model [Regulation 9(2)(k)]

The licensee is required to submit an up-to-date odour dispersion model that assesses the impact of emissions from the installation. The updated model and report should include the following:

- a. Identification of all the odorous waste streams and processes and confirmation that all odorous waste streams are stored and processed in the building where the extraction system is in place.
- b. up-to-date meteorological data. It is noted that the odour dispersion model received by the Agency on 21 January 2023 included five years of meteorological data for Dublin Airport for the years 2002 to 2006 inclusive in the model. AG4 guidance in relation to meteorological data is that the most recent year of the five-year dataset should be within the last ten years.
- c. Odour impact assessment using maximum volumetric flow rate and maximum odour concentration for A2-1. It is noted that only the average volumetric flow rate and average odour concentration for A2-1 is used in the model submitted.
- d. all required details as set out in section 6.12 of EPA Guidance Note (AG4) on Air Dispersion Modelling from Industrial Installations, and in particular a gridded receptor network and additionally provide results at specific sensitive receptors.
- e. Confirmation whether the average outlet odour concentration for A2-1 of 460 OuE/m³ will remain or increase due to the proposed 'depackaging plant' and all the odorous waste streams from the proposed increase of waste acceptance at the installation.
- f. Confirmation whether the average outlet volumetric flow rate for A2-1 of 45,936 m³/hr will remain or increase due to the proposed 'depackaging plant' and all the odorous waste streams from the proposed increase of waste acceptance at the installation.

- g. A cumulative assessment of the impact of industrial installations/waste facilities emissions sources in the region or justify why a cumulative assessment is not required.
 - h. Clarify whether A2-1 has appropriate access for monitoring.
2. Describe the waste activities that are carried out in each of the buildings. [Regulation 9(2)(g)].
 3. 'Depackaging unit' [Regulation 9(2)(g)].
 - a. Confirm whether the expired food 'depackaging' unit has been installed and in operation in Building A2.
 - b. Describe the plant, methods, process and operating procedures for the proposed food 'depackaging' unit and detail how the packaged food waste will be stored before and after processing.
 - c. Provide a detailed description and schematic of the odour abatement system.
 - d. Provide details of these wastes classified as animal by-products in accordance with Regulation 1069/2009.
 - e. Provide an updated storage plan showing where packaged food waste and odorous waste is stored prior to and post processing.
 4. Water and Energy Usage [Regulation 9(2)(f)].

Attachment 4.6.1 Water and Energy usage of the licence review application refers to the thermal energy consumption of '120 tonnes per annum of other fuel oil'. Clarify what type of fuel oil this is and what it is used for? Clarify whether there is a boiler on site and if yes, provide detail on the rated thermal input of the boiler.
 5. Section 9 Environmental Management and Techniques of the licence review application form [Regulation 9(2)(x)].
 - a. Section 9.1 Accident Prevention Measures refers to Section 4.9 of the Operational report included as Attachment 4.8.1 of the application. The operational report does not detail the measures to prevent accidental emissions and liabilities. Please describe, in the table provided in Section 9.1 of the licence application form, the existing and/or proposed measures, including emergency procedures, to minimise the impact on the environment of an accidental emission or spillage. (This table should include the measures to be taken under abnormal operating conditions, including start-up, shutdown, leaks, malfunctions, breakdowns, and momentary stoppages that will demonstrate that any emission arising will not cause significant environmental pollution). Information relating to the integrity, impermeability and recent testing of pipes, tanks and bund areas should be included.
 - b. Section 9.5. Review of a Licence of the licence review application form is blank, where the Office of Environmental Enforcement (OEE) has agreed any variations or adjustments to the conditions or schedules of the existing licence, the licensee must provide details of these agreed variations and adjustments to the existing licence conditions in the table provided in section 9.5 of the licence application form to be considered as part of the licence review application.
 6. Groundwater [Regulation 9(2)(j)].
 - a. Provide the monitoring point grid reference for the groundwater well on-site BH1/MW1.
 - b. Confirm whether groundwater for use at the installation is abstracted from the on-site groundwater well or the groundwater well located 1 km south of the installation as referenced in the EIAR submitted as part of the licence review application.
 - c. Provide details on what the groundwater is used for at the installation, if abstracted.

- d. If abstracting groundwater, clarify whether your abstraction is less than 25 cubic meters (25,000 litres) of water per day.
7. Sanitary and Waste Water [Regulation 9(2)(g)].
- a. Confirm if there are two or three underground storage tanks in total for storage of waste sanitary water, floor washdown water and drainage from waste storage and quarantine areas.
 - b. Confirm if the sanitary water is stored separately to the floor washdown water and drainage from waste storage and quarantine areas or are the waste streams mixed.
8. Storm water [Regulation 9(2)(g)].
- a. Confirm who owns the sewer to which the site storm water discharges.
 - b. Application Attachment 7.7- Discharges to Storm Water, states the storm water receiving waterbody code as IE_EA_09_109 (Tolka River). However, this code does not appear to exist. Provide the correct River Waterbody Code assigned in accordance with EPA Maps.
9. Waste Acceptance [Regulation 9(2)(t)].
- 1) Attachment C of the regulation 10(2)(b)(ii) response dated 20/01/2023:
 - a. refers to LoW code '20 01 02' for Paper and Cardboard, however the appropriate LoW code is 20 01 01 for paper and cardboard. Please confirm that the proposed maximum tonnage of paper and cardboard (LoW code 20 01 01) and glass (LoW 20 01 02) respectively to be accepted at the installation is 15,000 and 500 tonnes per annum.
 - b. Refers to LoW code '16 03 **36** off spec batches and unused products', please provide the correct LoW code for the intended waste and the associated description.
 - c. Proposes the acceptance of the hazardous LoW code 17 02 04* glass, plastic and wood containing or contaminated with hazardous substances. This licence review application is for the operation of a non-hazardous materials recovery and waste transfer installation; therefore, it is not permitted to accepted hazardous waste. Any hazardous waste received shall be quarantined and removed from the installation at the earliest possible time. Please confirm whether you propose to apply for a hazardous waste class of activity as part of this licence review application?
 - d. It is noted that the total maximum volume of waste to be accepted in tonnes per annum adds up to 449,000, whereas the planning permission permits 450,000 tpa. Is there a LoW code that you propose to accept at an additional 1,000 tonnes per annum?
 - e. Aside from cardboard bales, timber (pallets) and gas cylinders, confirm if any other wastes are/will be stored in outside areas. The Drawing provided in Attachment A of your response dated 20 January 2023 only shows the outside storage location for cardboard bales. Indicate on a detailed legible drawing the outside storage location of all the wastes and provide definitions of all the acronyms used on the drawing.
 - 2) Construction and Demolition Waste
 - f. Confirm whether all the proposed 450,000 tpa of waste to be accepted at the installation is from municipal waste sources, as the application refers to the acceptance of construction and demolition waste list of waste codes.
 - g. Confirm whether the installation proposes to continue to accept C&D waste and if so, provide details on the maximum tonnes per annum of construction and demolition waste to be accepted at the installation.
 - h. Clarify where the C&D waste is from, how it is processed and where it is located on the waste storage plan.

10. In the application form it is proposed that waste containing animal by-products will be accepted at the installation. Provide supporting information to show that the Department of Agriculture, Food and the Marine (DAFM) has issued the plant with a conditional or full approval in accordance with Regulation (EC) No.1069/2009. [Regulation 9(2)(g)]
11. Environmental Impact Assessment [Regulation 9(2)(t)].
The stakeholder engagement section of the application form, states that an EIS was submitted as part of planning application FW18A/0067. Clarify whether an EIS was submitted as part of the planning application FW18A/0067.
12. Best Available Techniques conclusions [Regulation 9(2)(h)].
In relation to the waste treatment (WT) CID 2018/1147 assessment, submitted as part of the licence review application form:
- The following BAT conclusion numbers, BAT 2, BAT 4, BAT 13, BAT 14, BAT 18, BAT 19, BAT 21, BAT 23, BAT 25, BAT 31, do not detail the BAT techniques in the WT CID used at the installation. Where BAT is to use one or a combination of listed techniques, specify the technique(s) implemented/proposed at your installation to achieve the BAT, for example BAT 2 (a), (b) and (c).
 - The BAT assessment section of your application form states that BAT 26 is applicable to your activity. BAT 26 relates to the *mechanical treatment in shredders of metal waste*. Please confirm whether shredding of metal waste is a mechanical treatment activity that occurs at the installation. If yes, please confirm whether Class of activity 11.4(b)(iv) *treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components*, is applicable to the installation.
 - The BAT assessment section of your application form states that BAT 29 and BAT 32 are applicable to your activity. BAT 29 relates to the treatment of WEEE containing VFCs and/or VHCs and BAT 32 relates to the mechanical treatment of WEEE containing mercury, please confirm whether these activities occur at the installation. I note your response states that BAT 28 and BAT 30 are not applicable to the installation as metals are not shredded at the installation and WEEE is not treated on site. Please confirm whether BAT 29 and BAT 32 are in fact applicable to the installation and, if yes, please submit the details on these activities at the installation, so that it can be considered as part of the licence review application.
13. Fit and Proper person Regulation 9(2)(g)].
Provide details of the applicant's technical knowledge and/or qualifications, along with that of other relevant employees, this should include a list of relevant individuals name, position, duties and responsibilities and experience/qualification; additional information, including the management structure and an organisational chart, as per the [licence application form guidance](#).

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.

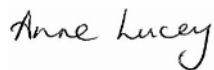
It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries please contact licensing@epa.ie.

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 [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)](#)

Please direct any queries to licensing@epa.ie.

Yours faithfully,



Environmental Licensing Programme
Office of Environmental Sustainability
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