



Electronic Copy

Mr. David Naughton

On behalf of Starrus Eco Holdings Limited

25 July 2023

Reg. No.: W0136-04

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 (Munster), Sarsfieldcourt Industrial Estate, Sarsfieldcourt, Glanmire, Cork, T45 R585

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 09 February 2023.

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. Waste Acceptance [Regulation 9(2)(t)].

In relation to waste acceptance activities provide or clarify the following:

- a. The Attachment "4. Activity Capacity and 4.3.1 – Storage of Waste and Other Materials" and the submitted Operational Report both provide one "Internal Site Storage Plan". However, both plans are different and don't identify which building the plan relates to. Accordingly, provide an updated Storage Plan for each building and update the associated storage capacities as appropriate.
- b. The application lists a number of waste streams which are not identified on the storage plan provided or within the associated storage capacities i.e.
 - a. Sludge (19 09 02, 19 13 06)
 - b. Street cleaning residues (20 03 03)
 - c. Wastes from mineral metalliferous excavation (01 01 01)
 - d. Bitumen and bituminous mixtures (05 01 17, 17 03 02)
 - e. Waste coating powders (08 02 01)
 - f. Waste printer toner (08 03 18)
 - g. Bottom ash, slag and boiler dust and Unprocessed slag (10 01 01)

- h. Waste blasting material other than those mentioned in 12 01 16 (12 01 17)
- i. Soil and stone, dredging spoil and track ballast wastes (17 05 04, 17 05 06, 17 05 08, 19 12 09, 20 02 02)
- j. Wastes from human or animal health care (18 01 04)

Accordingly, confirm if these wastes are to be accepted and if yes, provide details of their processing on site, their handling and storage location on the storage plan and their associated storage capacities.

- c. The application form identifies “Other” waste to be accepted at the maximum of 99,990 tonnes per annum. Clarify that this waste refers to “Commercial” and “Industrial” waste only.
- d. It is noted that food waste is to be accepted at the installation. Confirm if approval is required from the Department of Agriculture, Food and the Marine (DAFM) in relation to the handling and storage of this waste at the installation in accordance with Regulation (EC) No.1069/2009.

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

The licensee is required to submit an odour dispersion model that assesses the impact of emissions from the installation. The 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 odour control unit is in place.
- b. Odour impact assessment using maximum volumetric flow rate and maximum odour concentration for emission points A2-1 and A2-2.
- c. 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.
- d. A cumulative assessment of the impact of industrial installations/waste facilities emissions sources in the region where applicable or justify why a cumulative assessment is not required.

3. Odour control and monitoring & air emissions [Regulation 9(2)(g)]

- a. Clarify whether emission points A2-1 and A2-2 have appropriate access for monitoring.
- b. Provide a detailed description and schematic of the odour extraction and abatement system including the discharge of emissions at points A2-1 and A2-2.
- c. Provide the coordinates for ambient dust monitoring points D1-D4.

4. Provide the thermal input capacity (MWth) of the diesel generator providing power to the baling unit in the Recycling Building. Provide details of additional generators also if available on site [Regulation 9(2)(g)].

5. Confirm if there is a water meter for recording the quantity of water abstracted (m³) from the on-site well. Additionally, provide the co-ordinates for the location of the abstraction well [Regulation 9(2)(g)].
6. In relation to on site process water, foul water and surface water discharges, provide the following information [Regulation 9(2)(i):
 - a. The identification and capacity of each of the wastewater storage/ holding tanks.
 - b. Confirm if there is a volumetric flow meter on the discharge point SW-3 and SW-4. If yes, provide the average and maximum volumetric flow rate (m³/s) recorded from these discharge points and the total volume (m³) discharged for the previous three years for SW-4 and from years available in relation to SW-3.
7. Fit and Proper person Regulation 9(2)(g)].

Technical knowledge details and the organisation chart provided relate to the larger organisation only. Accordingly, provide site specific details of the licensee'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, experience/qualification and 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 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 **8 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
Tel: 053 – 9160600