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Ms Jennifer Cope
Environmental Licensing Programme
Office of Environmental Sustainability

14th August 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, D11 NP68

Dear Ms Cope,

I refer to the Agency's letter dated 10th August 2023 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013. The requested information is set out herein, with the EPA's requests in italics followed by the Starrus Eco Holdings Ltd (SEHL) response.

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/m^3 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 m^3/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.

An odour dispersion model that will address points *a* to *h* is being prepared and will be submitted to the Agency as soon as possible.

2 Clarify whether there is a boiler on site and if yes, provide detail on the rated thermal input of the boiler.

A boiler is not on-site.

Yours Sincerely

Jim O' Callaghan