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OPERATIONAL REPORT

STARRUS ECO HOLDINGS LTD

MILLENNIUM BUSINESS PARK

BALLYCOOLIN

DUBLIN 11

Prepared For: -

Starrus Eco Holdings Ltd

Prepared By: -

O'Callaghan Moran & Associates
Unit 15, Melbourne Business Park
Model Farm Road
Cork

August 2023

Project	Operational Report: Millennium Business Park			
Client	Starrus Eco Holdings Limited			
Report No	Date	Status	Prepared By	Reviewed By
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	23/08/2023			

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1. INTRODUCTION

Starrus Eco Holdings Ltd (SEHL) operates its Materials Recovery Facility (MRF) in the Millennium Business Park, Ballycoolin, Dublin 11, under an Industrial Emissions Licence granted by the Environmental Protection Agency (EPA). The installation currently accepts and process non-hazardous municipal solid waste, commercial and industrial and construction and demolition waste.

The licence specifies the infrastructural and operational controls that must be implemented to ensure waste activities do not give rise to environmental pollution or nuisance/impairment of amenity outside the site boundary.

The licence authorises the acceptance of 270,000 tonnes of waste per annum. It is proposed to increase the annual waste intake to 450,000 tonnes. The increased intake does not require either new buildings, or extensions to existing ones and does not involve any changes to the layout of external areas and drainage systems.

1.1 Scope

This report describes the design criteria and method of operation of the installation. It is based on the conditions in the current licence, the operational procedures prepared by SEHL and the information in the Environmental Impact Assessment Report (EIAR) that accompanies the review application. Following the grant of the revised licence this report will be amended to bring it into alignment with the conditions of the licence.

1.2 Annual Review

This report is subject to an annual review throughout the operational life of the installation to take account of operational experience, the progressive development of the facility, changes in regulatory requirements and developments in waste processing technology and methodologies.

2. SITE LOCATION & ENVIRONMENTAL SETTING

2.1 Site Location

The site is in Millennium Business Park, which is one of a number of industrial estates in the area (Figure 2.1). The Business Park is accessed via Cappagh Road, which connects the M50 to the south and the N2 to the north.

2.2 Surrounding Land Use

The site is in the east of an area that has been extensively developed for commercial and industrial use (Figure 2.2). The lots to the west are occupied by commercial units and warehousing. To east and north is Huntstown Quarry. The lot to the south is occupied by a cement manufacturing plant and further south and south-west are the Stadium and Rosemont Business Parks. The SEHL Panda Cappagh Road MRF is approximately 400 m to the south. The nearest occupied dwelling is approximately 1km to the south.

2.3 Hydrology

The site is in the catchment of the Tolka River, which is approximately 2.5 kilometres to the south west. There are no streams or water courses either on site, or in the surrounding area. The Tolka River is part of the Liffey Water Management Unit, as designated by the Eastern River Basin District Management Plan. The overall status of the river is 'Moderate', and it is considered 'At Risk' of not achieving its restoration objective of at least 'Good' status by 2027.

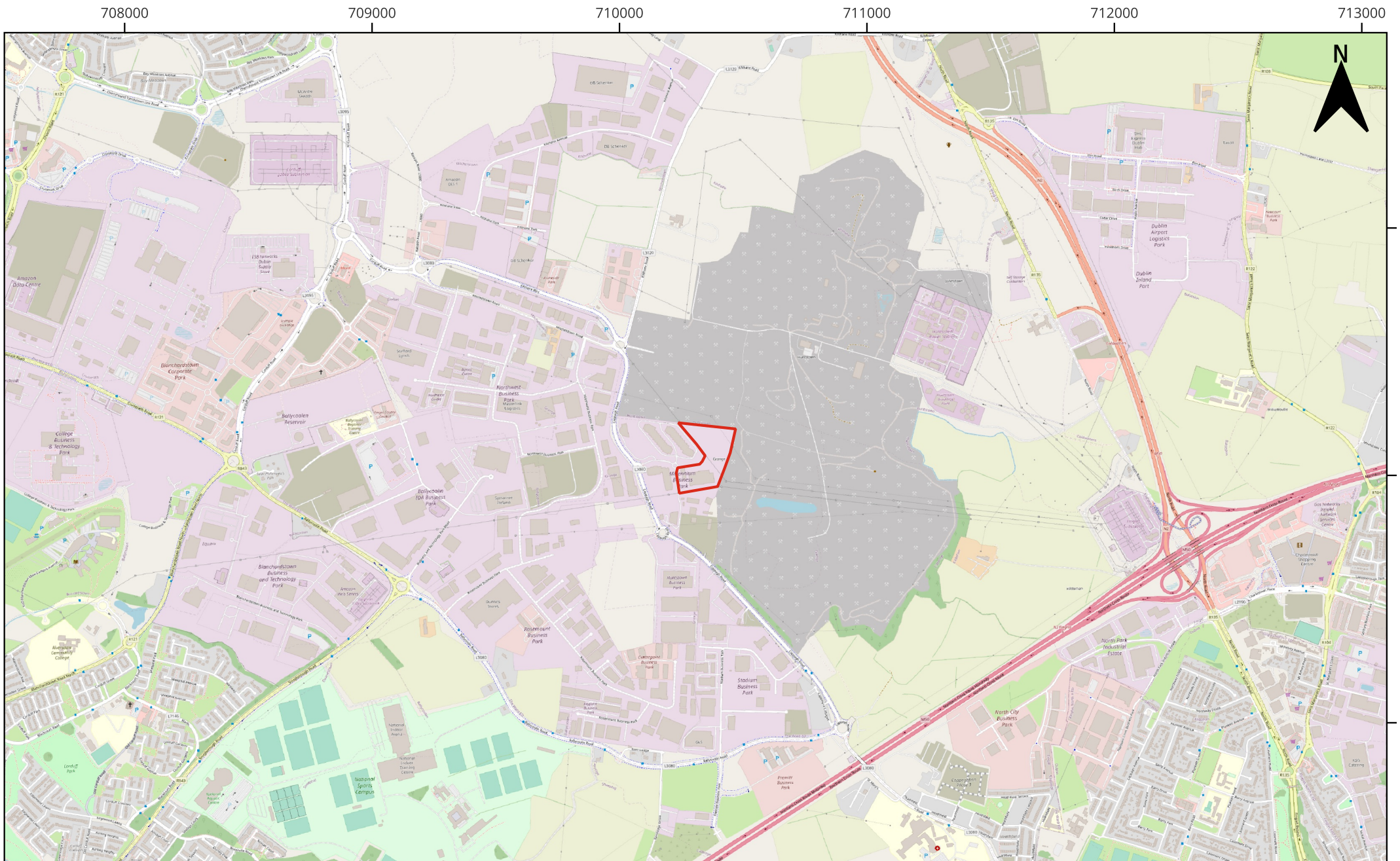
2.4 Geology and Hydrogeology

The subsoils beneath the site are between 1.3 and 8.45 m thick and comprise sandy gravelly boulder clays. The bedrock belongs to the Tober Coleen Formation and comprises calcareous, shale, limestone conglomerate. Immediately to the south, the bedrock consists of massive unbedded fine grained limestones of the Waulsortian Formation.

The bedrock is a poor aquifer which is generally unproductive except for Local Zones. The local direction of groundwater flow is to the south west, but is likely to be greatly influenced by the large scale quarrying immediately to the east of the site (Huntstown Quarry). The aquifer vulnerability to pollution from the ground surface ranges from High to Moderate across the Business Park. The aquifer is part of the Dublin Area Groundwater Body, which is categorised as being of 'Good' status, but is 'At Risk' of achieving its objective of protecting the existing status.

2.5 Designated Sites

There are no habitats of ecological importance within the site boundary and the site is not in or close to a Special Area of Conservation (SAC), Special Protected Areas (SPA) or National Heritage Areas (NHA). The nearest Natura 2000 site is the South Dublin Bay & Tolka River Estuary SPA which is 9.2 km south east of the facility.



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CLIENT

Starrus Eco Holdings Ltd

TITLE

Site Location

DETAILS

 Site Boundary

0 200 400 m



FIGURE 2.1

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CLIENT

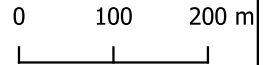
Starrus Eco Holdings Ltd

TITLE

Surrounding Land Use

DETAILS

-  Site Boundary
-  500m radius



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FIGURE 2.2

3. SITE DESIGN

3.1 Site Layout

The facility layout is shown on Drawing No. 211_066-ORS-ZZ-00_DR-AR-210. It covers 4.43ha and includes two waste processing buildings, one in the south of the site comprising two adjoining units (MP1 and MP2), with a total area of 4,388m² and one (MP3) in the north (4,226m²); an administration building/staff amenity (625m²); two weighbridges and associated control rooms; back-up generator; above ground bunded fuel tanks, paved open operational yards (5,170m²); vehicle parking and a vehicle wash area. Overhead high voltage overhead power line runs from north-west to south-east through the centre and north east of the site.

3.2 Security

The site is surrounded by a wall and security fence. Access is via the front gate, which is locked when the facility is closed. A CCTV surveillance system is provided and the yard area lighting remains on throughout the hours of darkness.

3.3 Services

Electricity is supplied by a utility company and there is an electrical substation on-site. Water is obtained from the Irish Water mains supply and also an on-site well. Wash water from the vehicle wash is discharged to the foul sewer serving the Business Park. Sanitary wastewater is discharged directly to foul sewer serving the Business Park. Water is obtained from the mains supply and an on-site well

3.4 Facility Roads, Access Roads & Hardstanding

The Business Park is accessed via the Cappagh Road. The internal access roads and hardstanding are provided in accordance with Condition 3.6 of the current licence.

3.5 Site Buildings

All of the buildings are maintained in accordance with Conditions 3.7 and 3.15 of the current licence.

3.6 Waste Inspection and Quarantine Areas

The waste inspection and quarantine areas required under Condition 3.8 of the current licence are clearly identified and separated from each other.



EXISTING SITE LAYOUT

SCALE 1:500

INFORMATION

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Figured dimension only to be taken from this drawing. All dimensions to be checked on site. Consultants to be informed immediately of any discrepancies before work proceeds.

REV NO.	DATE	REVISION NOTE	DWN BY:	CKD BY:
P01	21/02/2023	ISSUED FOR COMMENT	CB	CB
P02	03/03/2023	ISSUED FOR PLANNING	CB	CB

CLIENT:	STARRUS ECO HOLDINGS LIMITED (SEHL) TRADING AS GREENSTAR		
PROJECT:	PROPOSED ODOUR ABATEMENT SYSTEM MILLENNIUM BUSINESS PK, CAPPAGH ROAD, TOWNLAND OF GRANGE, BALLYCOOLIN, DUBLIN 11		
TITLE:	EXISTING SITE LAYOUT		
DRAWN:	CHECKED:	APPROVED:	JOB NO:
CB	CB	OD	211_066
DATE:	SCALE:	DRAWING NO:	REV:
03/03/2023	1:500	211_066-ORS-ZZ-00-DR-AR-210	P02

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3.7 Drainage

3.7.1 Foul Water

Sanitary wastewater and wash water from the vehicle wash is discharged to the foul sewer serving the Business Park. Rainwater run-off from areas of open yard that are susceptible to contamination is discharged to the foul sewer via a silt trap and oil interceptor.

3.7.2 Surface Water

The current drainage system is shown on Drawing No 21-138-17-01. The southern part of the site was constructed in 2004 and involved the construction of the processing building (MP1 and MP2) and yards in the southern part of the site.

The storm water drainage system was designed to direct run-off to the attenuation system serving the entire Millennium Park, with the additional provision of on-site storm water attenuation measures, comprising an underground storage tank that in addition to controlling the flow rate would also provide 'grey water'.

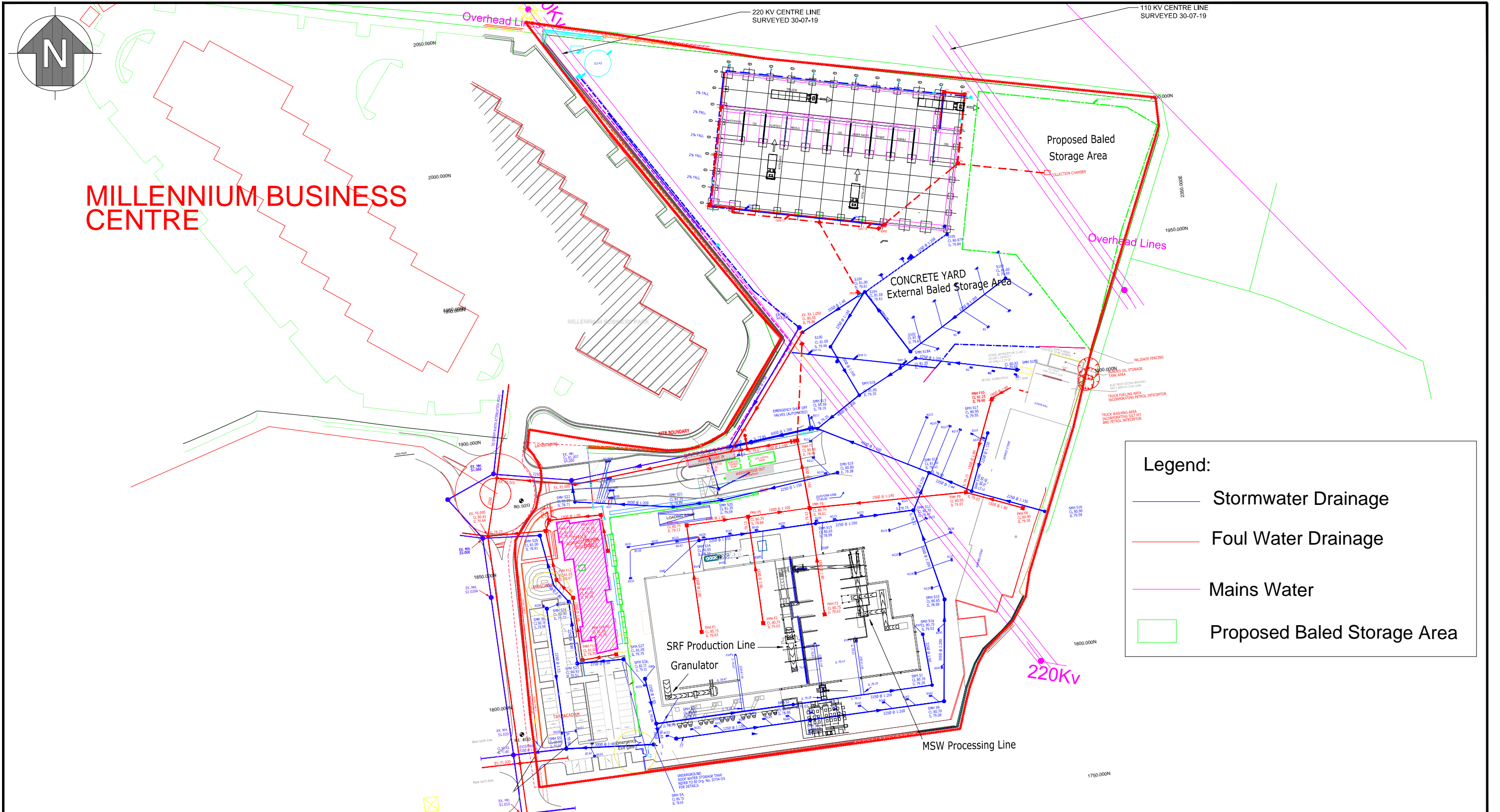
Rainwater run-off from building roofs and open areas where waste are not stored was discharged to the storm sewer serving the Business Park. Run-off from the area where vehicles are refuelled passes through a silt trap and Class I Oil interceptor. Run-off from open areas where waste are stored was directed to the foul water sewer serving the Business Park.

In 2013, contamination was detected in the storm water discharge. As part of the investigation SEHL contacted the Millennium Business Park Management Company which is responsible for maintaining the storm and foul water drainage systems serving the Business Park. The Management Company informed SEHL there was a problem with the flow in the sewer system serving the Business Park, which was causing back flow into the facility resulting in contamination at the monitoring locations.

Responsibility for addressing the drainage problems rests with the Management Company and, pending the resolution, the surface water run-off from the site was diverted to the foul sewer. Therefore there are currently no emissions to surface water.

In 2022 planning permission was granted for the installation of additional storm water attenuation capacity. The drainage system designed in accordance with the principles of Sustainable Urban Drainage Systems (SuDS). An attenuation tank designed to store a 1:100 year storm event will be installed. It will have a 2,391m³ storage capacity, which includes a 10% allowance for climate change. The greenfield run-off rate for the site is 6.36 litres/second (l/s) and the out flow from the tank will be restricted to this rate.

A silt trap and full retention interceptor will be installed up stream of the attenuation tank. The outfall from the tank will connect to the a silt trap and existing 900mm surface water drainage pipe at the eastern entrance of the site, once the drainage issues in the Business Park have been resolved. Pending this the run-off will continue to be discharged to the foul sewer.



MILLENNIUM BUSINESS CENTRE

Legend:

- Stormwater Drainage
- Foul Water Drainage
- Mains Water
- Proposed Baled Storage Area



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CLIENT
 Starrus Eco Holdings Ltd

FIGURE No.
 21-138-17-01

TITLE
 External Storage/Granulator and SRF Line

Project Specified Engineering Works	Date 08.03.21
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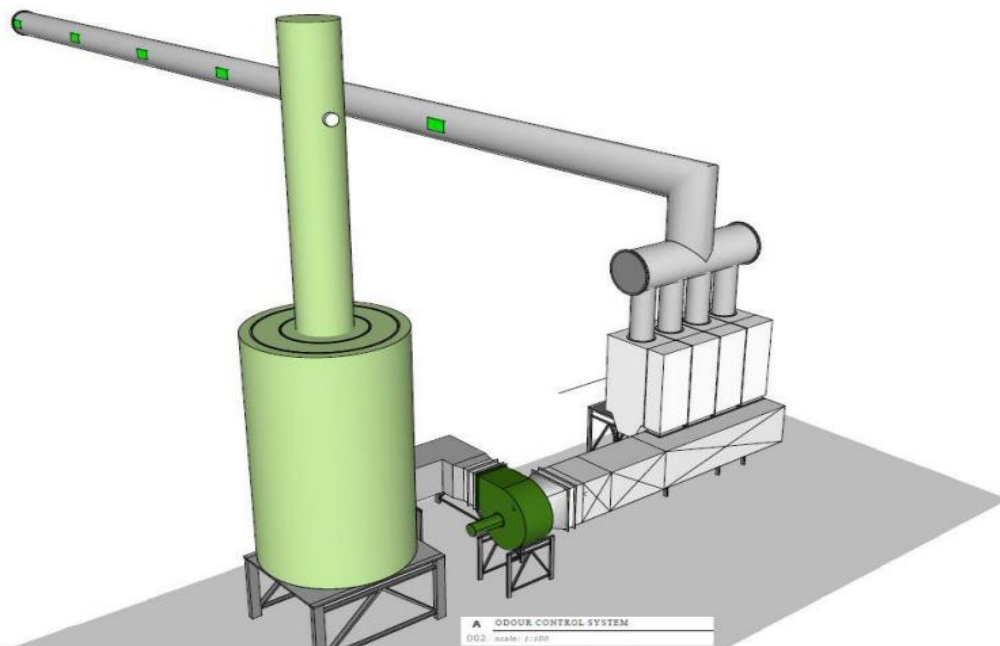
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3.8 Odour Control

Although current operations are not causing off-site odour nuisance, as a precautionary measure due to the proposed increase in the volume of odorous waste accepted, an odour control system will be installed.

The system, which will comprise a negative air extraction system and an odour control unit (OCU) consisting of a dust filter to remove dusts and a carbon filter to reduce odour levels, will be installed at MP1 (Figure 3.1). Prior to the installation the inside of the building will be cleaned and a thick foam spray applied to all cladding joints and other parts of the building fabric that could be susceptible to air leaks. Rapid action doors will be fitted to the vehicle access points.

Air will be drawn from the building using one extraction fan and a system of internal ceiling mounted ducts provided with grills. The fan will have a flow capacity to achieve 2 air changes per hour. The air will pass through a jet pulse dust filter before entering the carbon filter. A damper will be fitted to the inlet of the unit to allow the air flow to be balanced. The treated air will vent to atmosphere via a single stack.



3.9 Monitoring Infrastructure

Sampling and monitoring points are clearly labelled and safe and permanent access is provided to all on and off-site locations, as required by Condition 3.16 of the current licence.

3.10 Fire Control

SEHL has completed a site specific fire risk assessment and prepared a Procedure on Fire Prevention and Detection that takes into consideration the Agency's Guidance Note on Fire Safety at Non Hazardous Waste Sites and the UK Environment Agency's Technical Guidance Note TGN7-01 Reducing Fire Risk at Sites Storing Combustible Materials.

General fire detection and warning measures are maintained throughout the site. There are smoke detectors located in all indoor areas. MP 1 and MP2 are monitored by 24-hour Thermal Imaging CCTV.

There are 7 No on site fire hydrants located around the site in areas accessible by the Fire Service. Fire extinguishers and hose reels are positioned at strategic locations recorded in Fire Register. The extinguishers are subject to annual inspection and replenishment/replacement as required by a fire safety contractor.

3.11 Fuel and Chemical storage

A self-bunded 5,000 litre diesel tank is located to the south of the weighbridge for fuelling the mobile plant. A self-bunded 2,500 litre diesel tank is located in the north of the site. The back-up generator at MP2 has an internal 2,500 litre diesel storage tank. Hydraulic and engine oils are stored on bunded pallets in the maintenance shop in MP2. Bund integrity testing is completed at 3-year intervals.

3.12 Batteries

Batteries are not processed on the site but arrive in the waste streams such as MSW and bulky/skip waste. These are removed to a quarantine area and stored temporarily in 'Battery Bins' before being removed to a suitable licensed facility.

4. OPERATIONS

4.1 Site Management

The Facility Manager, who has the appropriate training and experience as required under the IE Licence, is responsible for day-to-day facility operations. All facility personnel are provided with appropriate training and have the requisite qualifications and experience to complete their assigned tasks.

SEHL has implemented an Integrated Management System (IMS) in accordance with the requirements of Occupational Health and Safety Assessment Series (OHSAS) 18001:2007 and International Standard Organisation (ISO) 14001:2004 in order to manage the Health, Safety and Environmental performance of their business and to control health and safety risk and to minimise their environmental aspects and impacts.

4.2 Waste Types & Quantities

The licence authorises the acceptance for 270,000 tonnes of non-hazardous Municipal, Commercial, Industrial and Construction & Demolition wastes. The actual amounts of each waste type accepted annually varies depending on market conditions. It is proposed to increase the annual waste intake from 270,000 to 450,000 tonnes.

4.3 Operational & Waste Acceptance Hours

The waste acceptance and operational hours are 24 hours a day 7 days a week.

4.4 Waste Acceptance

SEHL has, in accordance with the licence requirements, prepared documented waste acceptance procedures. All incoming waste is subject to a documented waste acceptance procedure. Wastes are delivered by waste collectors that have up to date Waste Collection Permits or are deemed exempt. Wastes are not accepted from either members of the public, or commercial waste collectors that do not have a contract with SEHL.

All deliveries arrive in fully enclosed vehicles that are weighed in at the weighbridge road and the accompanying documentation is checked. The driver is then directed to the waste intake areas in the appropriate building.

4.5 Site Processes

Municipal Solid Waste (MSW) Dry Mixed Recyclables (DMR), Brown Bin (food) waste, sterilised non-hazardous plastic medical waste and Solid Recovered Fuel (SRF) is accepted in the southern building (MP1 and MP2). Construction and Demolition (C&D) and Commercial & Industrial (C&I) wastes are accepted in the northern building (MP3).

The MSW is off loaded in MP2 where it is inspected for contamination and unsuitable materials are moved to a quarantine area. The materials are then processed to remove the organic, metal fraction

and recoverable 'lights' (plastics). Metals are sent for recycling, organic fines fraction sent for composting. The recoverable 'lights' are sent to the SRF production line in MP1. The residue, which contains some putrescible matter, is suitable for use as refuse derived Fuel (RDF) and is baled in an on-site baler and stored externally.

The sterilised medical waste is off loaded inside MP1, inspected and then loaded into the granulator which produces a granulated 'floc' that is sent to the SRF production line. The SRF is stored pending onward transfer to incinerators or cement kilns in Ireland and abroad where it is used as a fuel.

The operators of the Irish incinerators and kilns require the SRF to be delivered loose, whereas for export the SRF must be baled. The incinerators/ kilns regularly close down for maintenance and when this occurs the SRF that is delivered to the facility along with that produced on-site is baled in the on-site baler to facilitate longer term storage.

The Brown Bin waste is off loaded in a dedicated area inside MP2. Currently the Brown Bin waste is not processed, but is bulked up and sent off-site to authorised biological treatment plants. The DMR is off loaded in MP 1, where it is temporarily stored before being loaded into articulated trailers and sent off-site for further treatment at authorised facilities.

The C&I and C&D waste is handled in the northern building (MP3). The waste are off loaded in dedicated bays and are initially sorted using a mechanical grab to remove large items such as timber, metal and oversized light materials, which are removed to other storage areas in the building. The segregated materials are stored pending consignment to authorised treatment plants for further processing.

4.6 Operating Procedures

SEHL: has prepared a comprehensive set of Operating Procedures that cover all aspects of the day to day management of the installation and contingency measures. The procedures form part of the installation's Environmental Management System (EMS), which is certified to ISO 14001:2004, and are subject to regular review based on operational experience, legislative changes and improvements in best practice.

4.7 Health & Safety

SEHL has adopted an Accident Prevention Policy and has prepared a Safety Statement for the installation that address hazard identification and risk assessment. All personnel and visitors are obliged to comply with site guidelines regarding access to and from the facility and on-site traffic movement. All staff members are provided with and are obliged to wear, personal protective equipment (PPE) appropriate for their particular functions. PPE includes facemasks, gloves, safety glasses, steel-toed footwear, overalls, reflective jackets and helmets.

4.8 Emergency Response

An emergency is an accident/incident that has the potential to result in harm to human health, damage to off-site assets and give rise to environmental pollution. The licence requires the preparation of an Emergency Response Procedure (ERP) that identifies all potential hazards at the site that may cause damage to the environment and also specifies roles, responsibilities and actions required to deal quickly and efficiently with all foreseeable major incidents and to minimise environmental impacts. In addition, SEHL has documented procedure on the handling and storage of potentially polluting substances used at the facility, e.g. oils and the filling of tanks and mobile plant. The procedure

describes how filling the fuel storage tanks and refuelling/servicing the mobile plant should be carried out to minimise the risk of accidental spills and ensure that if these occur there is a rapid and effective response.

4.9 Emissions

4.9.1 Noise

The waste processing is a source of continuous noise emissions. Waste transport vehicles, staff private cars and the mobile plant are sources of intermittent emissions occurring during the waste acceptance and processing hours. Condition 5.5 of the IE licence stipulates that there shall be no clearly audible tonal component or impulsive component in the noise emissions from the activity at the noise sensitive locations.

4.9.2 Surface Water

Prior to the drainage problems in the Business Park the emissions to surface water comprised rainwater run-off from the building roofs and yards. This was weather dependent and periodic. Condition 5.4 of the IE licence specifies the following emission limits for the discharge to the storm water sewer:

- Biochemical Oxygen Demand (BOD) 25 milligrams/litre (mg/l)
- Suspended Solids 35mg/l
- Mineral Oils 5mg/l

4.9.3 Foul Sewer

Sanitary wastewater, wash water from the vehicle wash and rain water run-off from the entire site discharges to foul sewer. This is periodic, depending on operations and the weather. Table 2.3 lists the emission limit values specified in Schedule C3 of the licence for a range of pollutants present in the wastewater discharge.

Table 2.3 Foul Sewer Discharge Limits

Parameter	Emission Limit Value		
	Grab Sample (mg/l)	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD	6,000	5,000	50
COD	12,000	10,000	100
Ammoniacal Nitrogen	100	70	0.7
Suspended solids	2,500	2,000	20
Sulphate as (SO ₄)	1,000	1,000	10
PH	6-10	6-10	-
Temperature	42°C	42°C	-
Detergents	100	100	1.0
Fats, Oils & Greases	100	100	1.0
Phosphates (as P)	100	100	1.0

4.9.4 Air

The MSW and Brown Bin wastes are sources of odours. The plastics granulator is a source of dust generation inside MP1. In dry weather, vehicles travelling across paved areas are a potential source of dust emissions. Vehicle and mobile plant exhausts contain a range of compounds that affect air quality, for example carbon monoxide, methane, carbon dioxide, and particulates.

4.9.5 Ground & Groundwater

There no direct or indirect emissions to ground and groundwater.

4.10 Emission Controls

The licence specifies the emission controls that SEHL is obliged to implement to ensure operations do not cause environmental pollution and do not give rise to nuisance or impairment of amenity outside the site boundary. The controls are based on the requirements of the European Union BAT Reference Document for Waste Treatment (2018.).

4.10.1 Noise

All waste reception and processing is carried out inside the buildings. The plastic waste granulator in MP1 is housed in an acoustically screened area with mass concrete walls on two sides and insulated panels on the other two. The roof of the screened area is also fitted with insulated panels.

4.10.2 Surface Water & Groundwater

Condition 8.3 of the licence requires SEHL to have an adequate supply of containment booms and/or suitable absorbent material on-site to contain and absorb any spillage at the facility. Once used the absorbent material must be disposed of at an appropriate facility

Condition 3.11 requires that all tank and drum storage areas must be impervious to the stored materials and that all storage areas be bunded, either locally or remotely, to a volume not less than the greater of the following:

- a) 110% of the capacity of the largest tank or drum within the bunded area; or
- b) 25 % of the total volume of substance, which could be stored within the bunded area

4.10.3 Air

4.10.3.1 Dust

Waste processing is and will continue to be located inside the buildings. The granulator is fitted with two dust cyclone collection units, installed in compliance with Condition 3.15.3 (iii) of the licence, that effectively control the dust emissions. SEHL cleans the paved yards and building floors regularly using a road sweeper and damps down the yard using hoses in dry periods.

4.10.3.2 Vehicle Exhausts

The diesel fuelled heavy goods vehicles based at the facility are fitted with Selective Catalytic Reduction (SCR) systems. A diesel fuel additive (AdBlue) is used in the SCR to reduce the nitrous oxide levels in the exhaust gases.

4.10.3.3 Odours

The only wastes accepted at the facility that are a significant source of malodours are the mixed solid waste and brown bin waste, which are handled and stored in MP1. SEHL has prepared an Odour Management Plan (OMP) that specifies the control measures that are implemented to ensure operations do not cause off-site odour nuisance. The control measures include:

- Fast turn-around times for the wastes prevents the accumulation of large volumes of odour generating waste. Condition 6.5.1 of the EPA licence requires that “all waste for disposal to be removed from the facility within forty eight hours of its arrival at the facility”;
- All ‘brown bin’ waste is bulked up and transferred as soon as possible to designated facilities for processing. The segregated fractions from the MSW processing line are sent off-site to their destinations as soon as possible after processing;
- At any one time there is a maximum of 200 tonnes of MSW and 100 tonnes of ‘brown bin’ waste inside the building;
- Weekly cleaning of all bays where MSW and ‘brown bin’ waste is stored;
- Fast acting doors on the entrances to MP2 that minimise the door opening times when vehicles enter and leave the building, and
- A mobile odour neutralising atomiser is maintained at the site and deployed in the event of extended periods of warm weather or if a particularly odorous load is delivered.

Following the grant of the revised licence the OMP will be updated to include the odour abatement system described in Section 3.8.

4.11 Nuisance Control

The site and immediate surroundings are inspected on a daily basis for litter inside and outside the installation boundary and if present it is removed. SEHL have contracted a specialist pest controller who visits the site monthly to replenish vermin station bait boxes and will also call out to deal with insect infestation if they occur. The fast acting doors on the entrances to MP2 deter birds from entering the building.

4.12 Environmental Monitoring Programme

The current monitoring requirements are as follows.

- Quarterly monitoring of the surface water emission.
- Bi-monthly monitoring of the waste water emission.
- Dust monitoring to be carried out at two locations biannually.
- Annual noise monitoring.

Incidents

An incident is: -

- (i) an emergency;
- (ii) any emission which does not comply with the requirements of this licence;
- (iii) any exceedance of the daily duty capacity of the waste handling equipment;
- (iv) any trigger level specified in this licence which is attained or exceeded;
- (v) any indication that environmental pollution has, or may have, taken place.

In the event of an incident SEHL is required to immediately:

- (i) carry out an investigation to identify the nature, source and cause of the incident and any emission arising therefrom;
- (ii) isolate the source of any such emission;
- (iii) evaluate the environmental pollution, if any, caused by the incident;
- (iv) identify and execute measures to minimise the emissions/malfunction and the effects thereof;
- (v) identify the date, time and place of the incident;
- (vi) notify the Agency and other relevant authorities

as required by Condition 10.2 of the existing licence.

4.13 Complaints

All complaints are recorded in a Complaint Record, as specified in Condition 9.4 of the licence. The information recorded includes: -

- Date and time of the complaint;
- Name of the complainant;
- Details of the nature of the complaint.

The EHS Manager, or nominated Deputy Manager is responsible for its investigation and the implementation of any corrective measures. In the event that corrective actions are required SEHL records the actions and informs the complainant.

4.14 Annual Environmental Report (AER)

The scope of the AER is set out in Schedule E of the current licence. The preparation of the AER involves a review of the progress in achieving the Environmental Objectives and Targets, reports on site development works, resource consumption, changes to existing or introduction of new operating procedures and an assessment of the impacts of site activities.