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Environmental Licensing Programme
Office of Environmental Sustainability

29th September 2023

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/Madam,

I refer the Agency's letter dated 25th July 2023 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013. The EPA's requests are set out in italics followed by the response.

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.*

Section 2.12 of the Operational Report states that 'SEHL has prepared a Waste Storage Plan for all waste and other materials stored and held at the installation. This is a dynamic document that is subject to regular revision. A copy of the current Plan is maintained on site for inspection by the OEE'. The Emergency Response Procedure in Appendix 3 of the Operational Report includes drawings showing the storage locations in use at the time the Procedure was prepared. Attachment 4.3.1 includes the Plans that were in place when the licence review application was submitted.

Updated Storage Plans for both buildings and external storage areas are in Attachment A. The Plan titled Sarsfieldcourt relates to the northern area and the Plan titles Glyntown relates to the southern area of the site respectively.

- 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.

The list of waste streams submitted in the application covers wastes that are currently accepted and those that may be accepted in the future. The LoW codes referred to above fall into the latter. When they are accepted the storage plan will be amended to show the storage locations and associated storage capacities.

It is requested that the condition(s) in the revised licence relating to the storage of materials do not refer to the Storage Plans submitted with the review application, but to a Storage Plan approved by the OEE.

- 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.*

The 'Other' waste to be accepted refers to Commercial and Industrial waste only. It is noted that the online Licence Application Form does not allow any clarification of the term 'Other'.

- 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.*

Approval from the DAFM is not required.

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.

SEHL has engaged Odour Monitoring Ireland Ltd to carry out the odour dispersion modelling and this will be submitted when completed.

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.

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.

Section 2.17.3 of the Operational Report describes the odour extraction and abatement system. ‘...The OCU comprises two active carbon filters with a dust pre filter and an automated self-clean system, fed by a negative air pressure system powered by a backwards inclined aerofoil fan’. The installation of the odour abatement system was subject to a Specified Engineering Works (SEW) submission approved by the OEE. The schematics of the internal and external layout of the system included in the SEW are in Attachment B.

c. Provide the coordinates for ambient dust monitoring points D1-D4.

The Irish National Grid (ING) grid co-ordinates for the dust monitoring points are:

	ING Easting	ING Northing
D1	172224	79017
D2	172102	78944
D3	172125	79054
D4	172195	79083

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)].

The estimated thermal input capacity of the diesel generator in the Recycling Building is 1.2 MWth. This is the only generator at the site.

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)].

There is no meter for recording the quantity of water abstracted from the on-site well. The ING well co-ordinates are:

ING Easting	ING Northing
172142	79032

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.*

There are two on-site underground wastewater storage/holding tanks in the northern area of the site have capacities of 41.8m³ and 119.62m³. These are used to hold sanitary wastewater from the staff welfare facilities and storm water run-off from the entire site respectively. The largest holding tank is located east of the weighbridge, as shown on the Drainage Drawing for the Northern Area in Appendix 1 of the Operational Report. The sanitary wastewater tank is not shown on the Drawing, but is located between the largest holding tank and the weighbridge office.

There is one underground holding tank in the southern area which was used to hold sanitary wastewater from staff welfare facilities. These facilities have been removed and the tank is now redundant.

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.*

The current Licence and Waste Permit do not require the measurement of volumetric flows at discharge points SW-3 and SW-4 and volumetric flow meters are not installed.

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](#).

The installation is subject to regulation by the OEE and Cork City Council and is one of 15 SEHL licensed installations, of which 13 are operational and all of which have the appropriate financial provisions in place. Therefore it was incorrectly assumed that the Agency would be satisfied that the applicant meets the Fit and Proper Person requirements of the Regulations.

As roles change over time and some staff members leave organisations as part of their career progression typically individual names are not provided in licence applications. In addition there are implications for the applicant in relation to the provision of personal information on its employees under the General Data Protection Regulations.

In relation to ensuring the installation is managed appropriately, SEHL will continue to comply with the requirements of Conditions 2.1 and 2.2 of the current licence.

Condition 2.1 requires SEHL to 'employ a suitably qualified and experienced installation manager who shall be designated as the person in charge. The installation manager or a nominated, suitably qualified and experienced deputy shall be present on the installation at all times during its operation or as otherwise required by the Agency'

Condition 2.2 requires SEHL to 'ensure that personnel performing specifically assigned tasks shall be qualified on the basis of appropriate education, training and experience as required and shall be aware of the requirements of this licence'.

SEHL is part of the Beauparc Group, which is the largest waste management company operating in Ireland, with significant operations in the UK and the Netherlands. An organogram of the Group is in Attachment C.

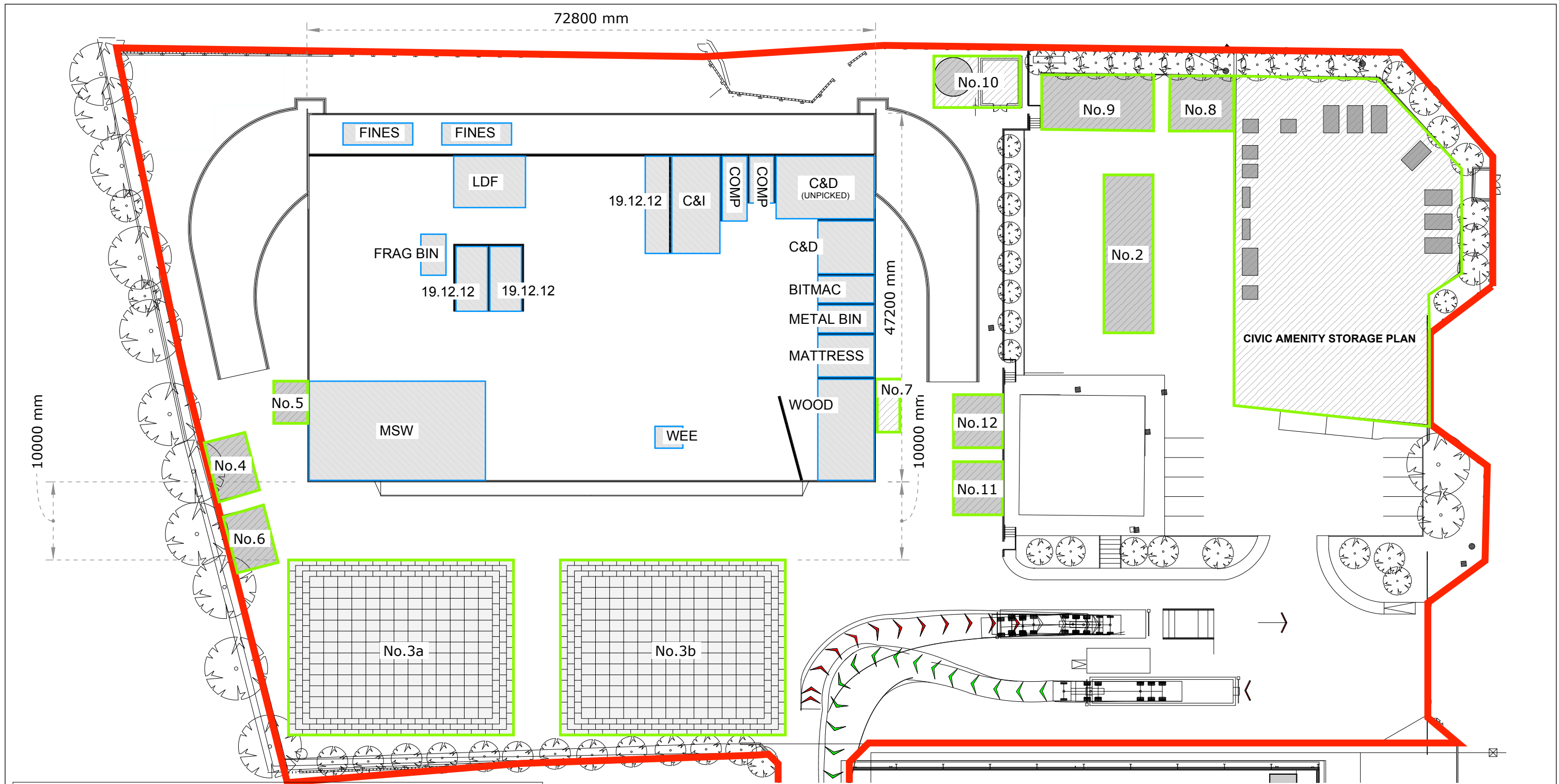
In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The information provided in the response does not impinge on the non-technical summary.

Yours Sincerely


Jim O' Callaghan

ATTACHMENT A




SARSFIELD COURT - EXTERNAL SITE STORAGE PLAN

Maximum Storage Quantities for External Storage Areas

- Area 1 - Civic Amenity Area
- Area 2 - Skips & Roll-on Bins for Repair
- Area 3a - Maximum 1500 tonnes, stacked max of 4 high, 10m from MRF with 3m high concrete wall segregation from 3b.
- Area 3b - Maximum 1500 tonnes, stacked max of 4 high, 10m from MRF with 3m high concrete wall segregation from 3a.
- Area 4 - Maximum 6 cages of gas bottles and extinguishers
- Area 5 - Maximum of 4 1000l IBC containers
- Area 6 - Maximum of 1 artic truck load of Weee and 2 1000l IBC containers
- Area 7 - Maximum 40 bins for washing
- Area 8 - Maximum 6000l AdBlue tank
- Area 9 - Maximum of 17,830 litres of diesel (2 tanks 1x road diesel 15,000lts 1 x plant diesel 2830lts)
- Area 10 - Maximum of 60,000 litres of water in tank
- Area 11 - Max 4 skips quarantine area for fire damaged materialh
- Area 12 - Up to 5 skips for waste tyres

INTERNAL SITE STORAGE PLAN

NAME	MATERIAL	BAY CAPACITIES
MSW	- Municipal Solid Waste	500 TONNES
19.12.12	- Processed Municipal Solid Waste	100 TONNES
METAL	- Metals	25 TONNES
WOOD	- Wood	40 TONNES
MATT	- Mattress'	MATTRESSES TO BE STRIPPED
SPRING	- Mattress springs	300 UNITS
C&D CLEAN	- Bulky Construction and Demolition	85 TONNES
COMP	- Compost	80 TONNES
COMP	- Compost Commercial	50 TONNES
LDF	- Landfill Material	75 TONNES
C&I	- Commercial & Industrial Dry Lights	100 TONNES
C & D	- Mixed Construction and Demolition fines	70 TONNES
FRAG BINS	- Metal extracted from waste stream	2 X 35CY SKIP
FINES	- Organic Fines extracted from waste stream	2 X TIPPING TRAILERS @ 25 TONNES EACH
19.12.12	- PROCESSED MSW FOR BALING	BAY HOLDS 10 TONNES BUT IS EMPTIED CONSTANTLY



BEAUPARC DESIGN

3DA
3D ARCHITECTURE
FITZWILLIAM SQ,
DUBLIN 2

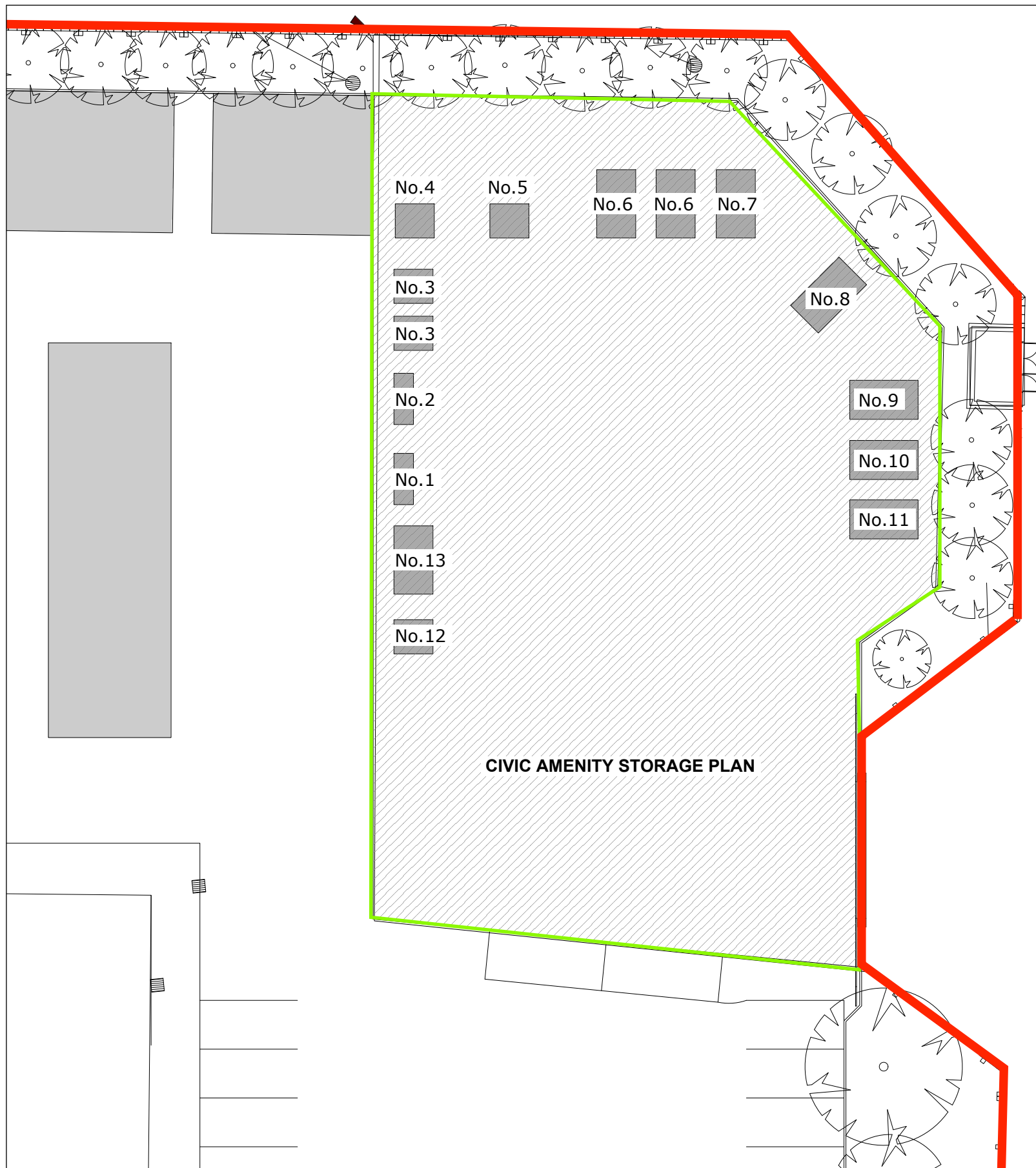
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Title: WASTE STORAGE PLAN

Client: GREENSTAR / BEAUPARC

Dwg. No. 3DA-001 Job No. 3DA-101

Drawn By: Cathal McDonnell	Scale: 1:500	Size: A3	Date: February 17, 2024	Rev. No: 3DA-101	Checked By: Cathal
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- CIVIC AMENITY STORAGE PLAN**
1. PLASTIC FILM (2 X 1100L BINS or SKIP)
 2. PAPERS / NEWSPRINT (2 X 1100L BIN OR SKIP)
 3. CLOTHES BANKS (2 X BIN) EMPTIED MONTHLY
 4. GLASS (1 X 1100L BIN OR SKIP) EMPTIED DAILY
 5. CONCRETE / SOIL (1 X SKIP) EMPTIED DAILY
 6. BULKY WASTE C&I (2 X 20CU/YD SKIP) EMPTIED DAILY
 7. BLACK BAG WASTE (20CU/YD SKIP) EMPTIED DAILY
 8. WOOD (20CU/YD SKIP) EMPTIED DAILY
 9. COMPOST/GARDEN WASTE (20CU/YD SKIP) EMPTIED DAILY
 10. CARDBOARD (20CY SKIP) EMPTIED DAILY
 11. METAL (20CU/YD SKIP) EMPTIED DAILY
 12. GAS BOTTLES (2 X 1100LTR CAGES) EMPTIED DAILY
 13. WEEE ELECTRICAL (2 X 1100LTR CAGES) EMPTIED DAILY

CIVIC AMENITY STORAGE PLAN

BEAUPARC DESIGN



Project:		SARFIELD / GLANMIRE
Title:		WASTE STORAGE PLAN
Client:		GREENSTAR / BEAUPARC
Dwg. No.	Job No.	
3DA-002	3DA-101	

Drawn By:	Scale:	Size:	Date:	Rev. No.	Checked By:
Cathal McDonnell	1:250	A3	February 17, 2024	3DA-101	Cathal

BALED PAPER – 4 X CONTAINERS / 200 BALES

GLASS – 30 TONNES

BALED C&I – 1 X LOADS / 48 BALES

BALED OCC – 4 X LOADS / 192 BALES

BALED PAPERS – 5 LOADS / 250 BALES

BALED NEWS – 100 BALES

COM DMR – 50 TONNES

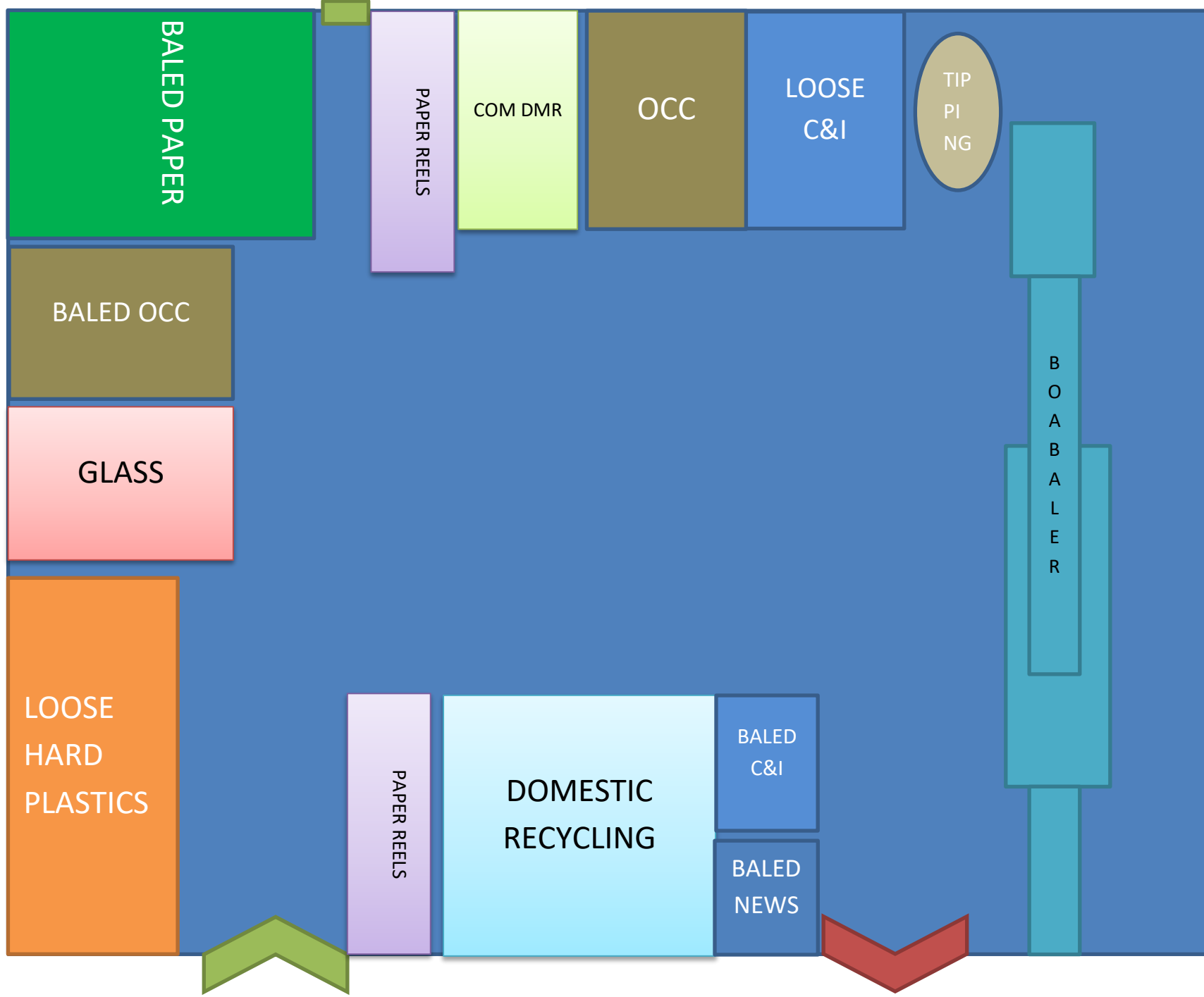
OCC – 50 TONNES

LOOSE C&I – 80 TONNES

DOMESTIC RECYCLING – 80 TONNES

BALED PAPER – 200 BALES

LOSE HARD PLASTICS – 10 TONNES



ATTACHMENT B

FOR INFORMATION

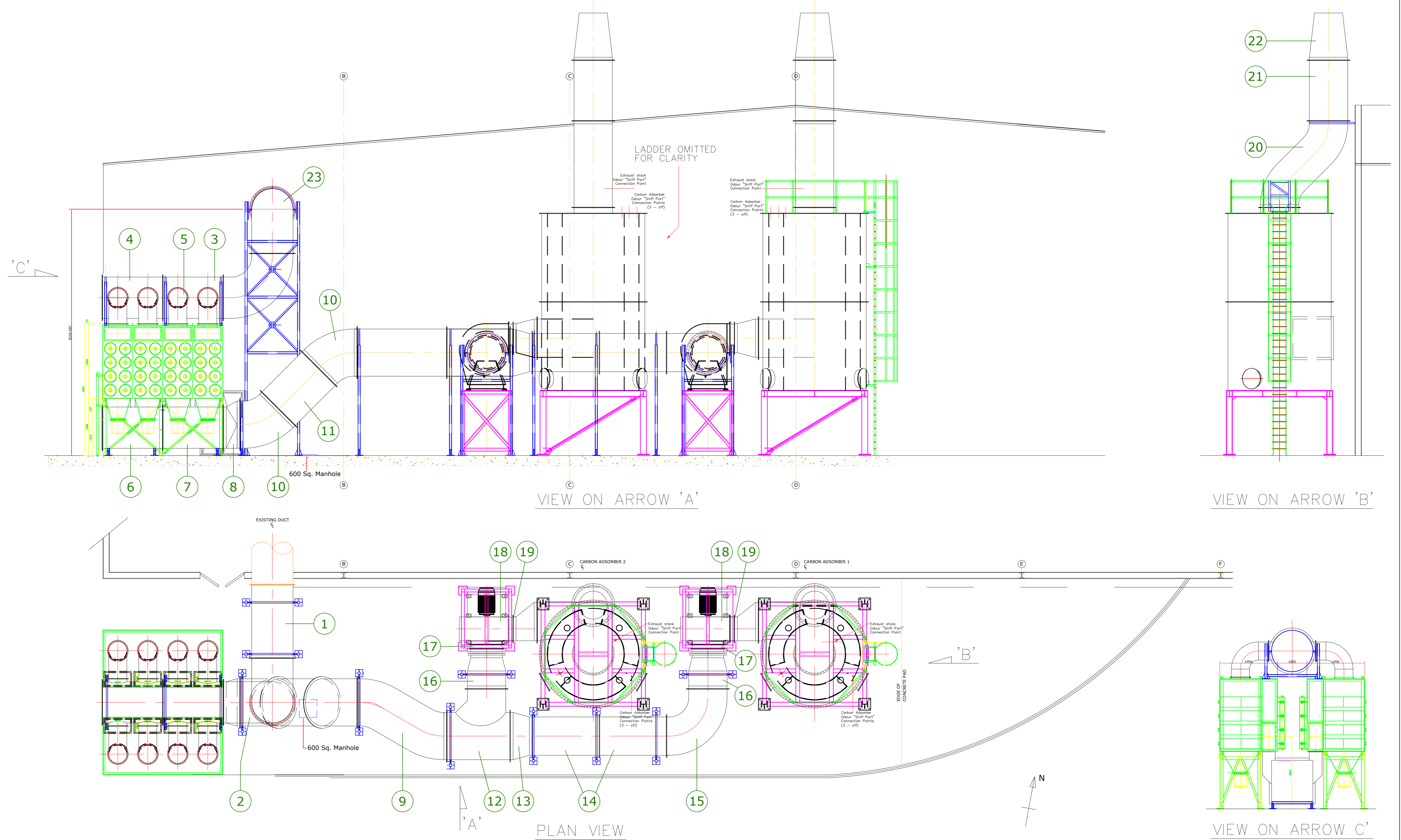
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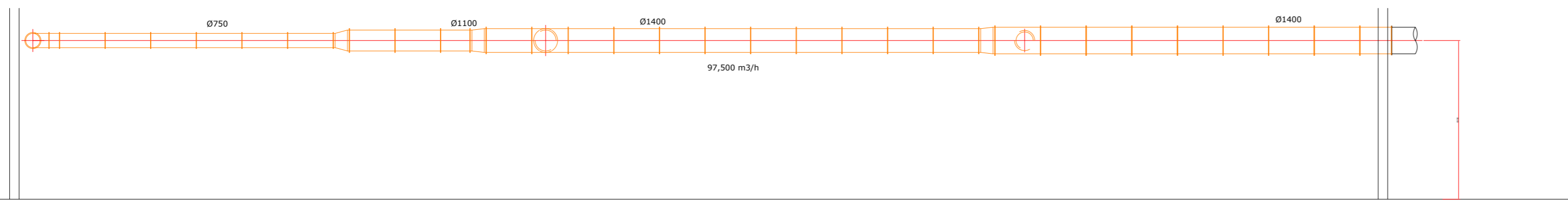
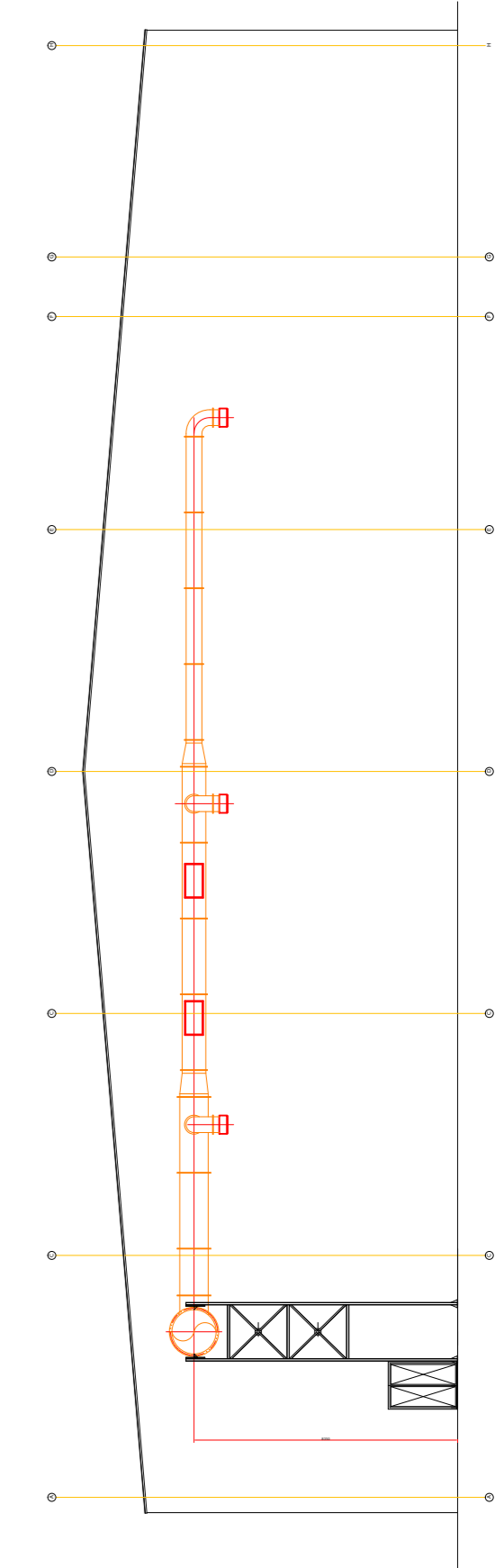
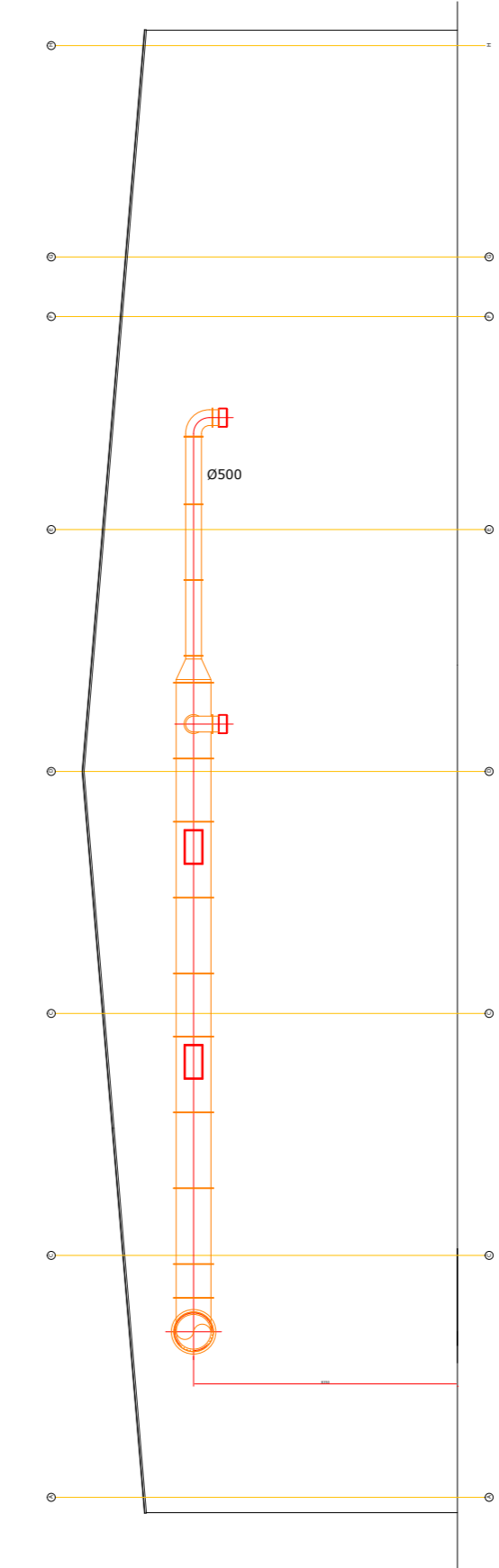
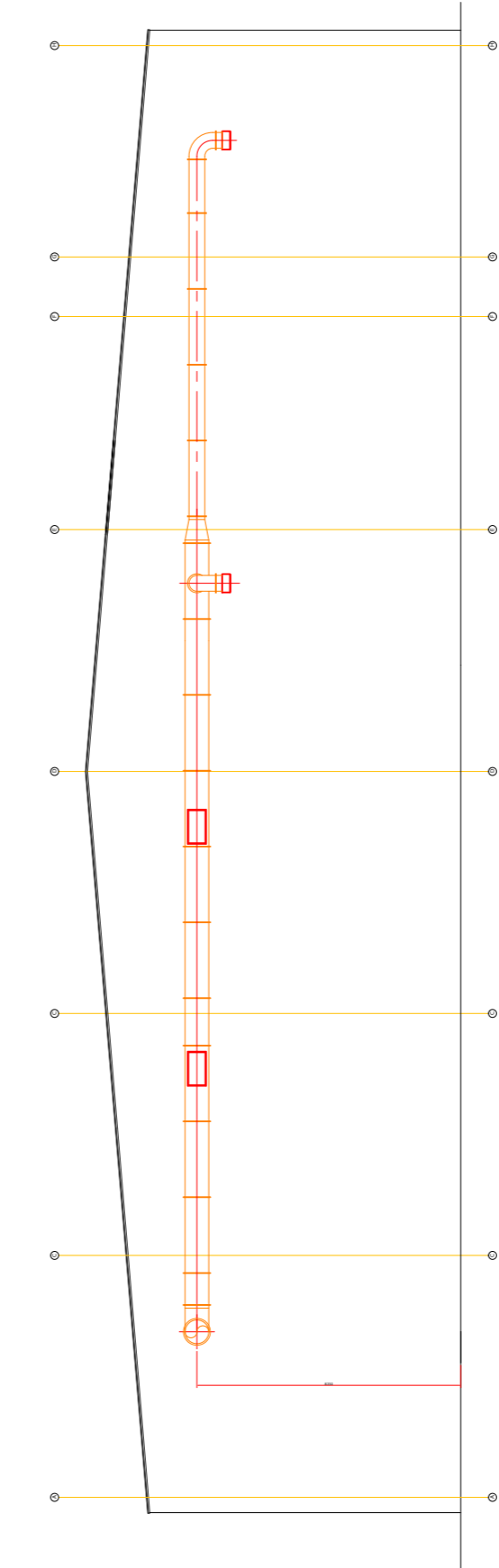
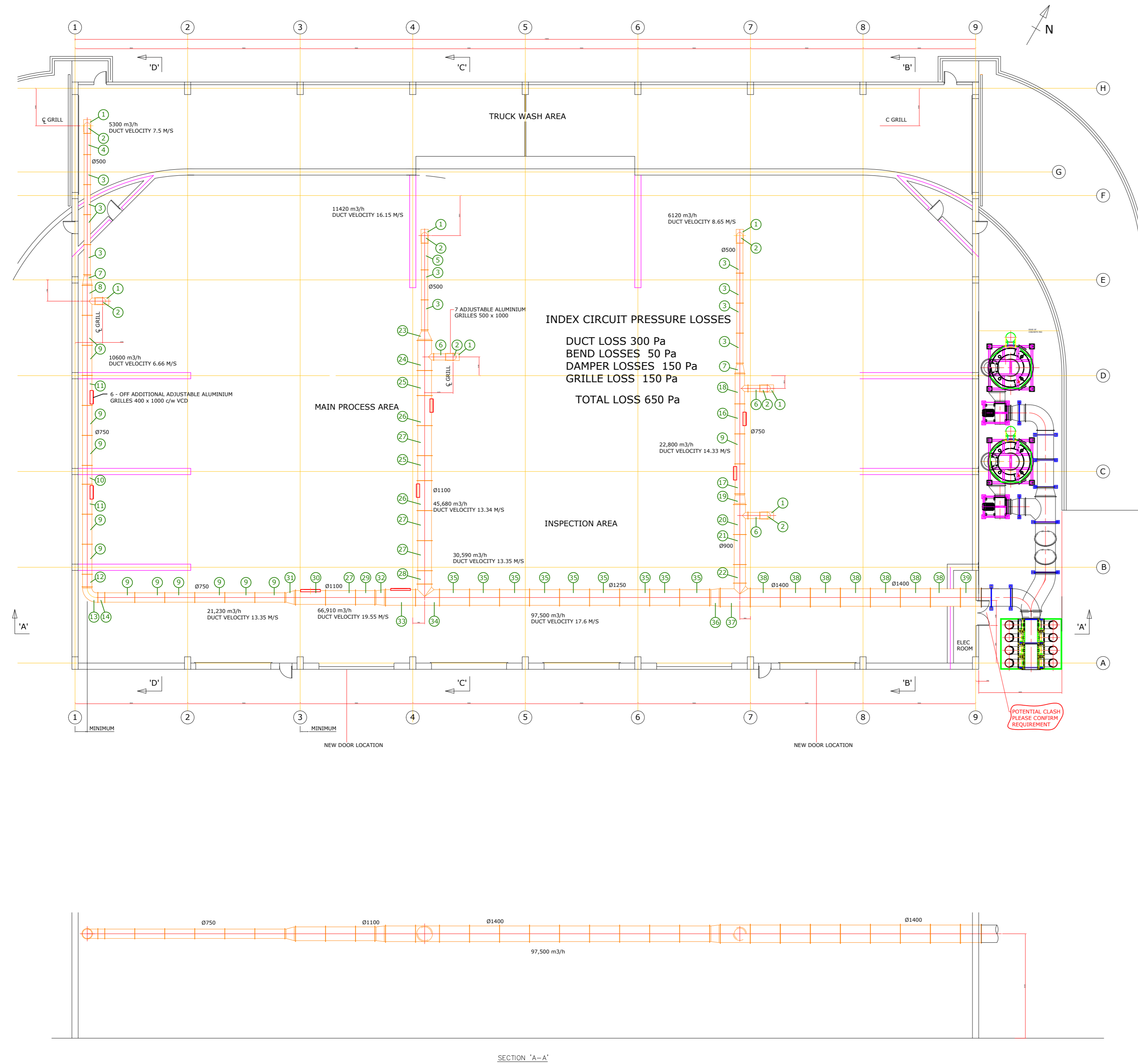
Pollution Solutions through Engineering Excellence

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DRN	TITLE		
NRC	Layout of External Carbon Adsorber System (with Odour Sniff Points)Greenstar Recycling - Glanmire Co. Cork		
CHD	SCALE	DATE	DRG No
	NTS	29/06/14	JB 1192-14/1/1



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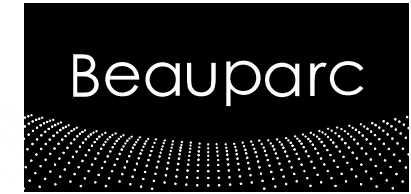
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DRN	TITLE		
NRC	Layout of Internal Ducting for OCU System – Greenstar Recycling – Glanmire Co. Cork		
CHD	SCALE	DATE	DRG No
	NTS	29/06/14	JB 1197-14/1/2

ATTACHMENT C

Beauparc Group Structure



Building Better Business

