



Submission

Submitter:	Miss Sharon Donnelly
Organisation Name:	HSE
Submission Title:	IE Licence Review W0183-03
Submission Reference No.:	S011330
Submission Received:	12 October 2023

Application

Applicant:	Starrus Eco Holdings Limited
Reg. No.:	W0183-03

See below for Submission details.

Attachments are displayed on the following page(s).



Rialú Bia Baile Átha Cliath Fhine Gall
Seirbhís Sláinte Comhshaoil

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EPA Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford
licensing@epa.ie

12th October 2023

Re: Waste Management Licence Application W0183-03

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the scoping of the above proposal.

The following HSE departments were notified of the consultation request for this development on the 6th September 2023.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore
- CHO – Mellany McLoone

If you have any queries regarding this report the contact is Lisa Fitzpatrick, Principal Environmental Health Officer, Fingal at lisa.fitzpatrick@hse.ie

Yours sincerely,

Lisa Fitzpatrick
Principal Environmental Health Officer

HSE SUBMISSION REPORT

Environmental Health Service Consultation Report

as a Statutory Consultee (Planning and Development Acts 2000, & Regs made thereunder)

Date:	12 th October 2023
Our Reference:	3413
Report To:	Environmental Licensing Programme Office of Environmental Sustainability Environmental Protection Agency Johnstown Castle Estate Co. Wexford
EPA Reference:	W0183-03
Type of Consultation:	Waste Management
Applicant:	Starrus Eco Holdings Ltd.
Nature of Activity:	Activity Class 11.1 and 11.4 (b)(ii) Class 11.1 The recovery or disposal of waste in a facility, within the meaning of the Act of 1996, which facility is connected or associated with another activity specified in the Schedule in respect of which a licence or revised licence under Part IV is in force or in respect of which a licence under the said Part is or will be required. Class 11.4 (b) (ii) Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities, (other than activities to which the Urban Water Treatment Regulations 2001 (SI No. 254 of 2001 apply): <ul style="list-style-type: none">• Pre-treatment of waste for incineration or co-incineration
Location:	Panda Waste Management Solutions, Ballymount Road Upper, Dublin 24.

General Comment

Details of the application were circulated to HSE stakeholders on the 6th September 2023

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore
- CHO – Mellany McLoone

Introduction

The licence relates to the Starrus Holdings Ltd's Material Recovery Facility (MRF) in the Millennium Business Park, Ballycoolin, Dublin 11, an area predominantly used for commercial and industrial use.

The MRF operates under an Industrial Emissions Licence (W0183-01) granted by the EPA. It is proposed to increase the annual waste intake from 270,000 tonnes to 450,000 tonnes. (source Non-Technical Summary Pg 1)

The facility operates 24 hours per day 7 days per week on a site 4.43 hectares in size with approximately 30 full time staff employed, and includes two waste processing buildings. It was noted from the Non-Technical Summary as part of the licence review application that there will be no change to the types of waste accepted at the facility. One of the two buildings is earmarked to process Municipal Solid Waste (MSW), Dry Mixed Recyclables (DMR), Brown Bin (food) waste, sterilised non-hazardous plastic medical waste and Solid Recovery Fuel (SRF) waste. The second building is earmarked to process Construction and Demolition Waste (C&D) and Commercial and Industrial (C&I) wastes.

The Environmental Health Service (EHS) understands that there is no new infrastructure proposed and that the extra volume of waste will be processed using the existing facilities.

Site Location

The facility is located at the Millennium Business Park, Ballycoolin, Dublin 11 access via the Cappagh Road, Finglas.

Connection to other Licence Applications

The EHS understands that this licence application is connected closely to a previous licence application made in 2022, namely IE Licence No. W0261-03 applied for by Starrus Eco Holdings Ltd, for the same class of activities, at the same location and for the same increase in volume of waste from 270,000 tonnes to 450,000 tonnes per annum.

Local Observations

Sharon Donnelly, Senior Environmental Health Officer in Fingal was consulted during the course of preparation for this submission. She reported that they have received no complaints from locals or other businesses in relation to this facility.

Recommendations

- The EHS recommends that the previous submission made on April 7th 2022 under our Reference 2063, EPA Reference W0261-03 signed by Lisa Fitzpatrick, Principal Environmental Health Officer and Lisa Maguire, Environmental Health Officer should be taken into consideration under this licence application.
- Particular attention is drawn to the two conclusions made under the April 7th submission
 1. “The Odour Management Plan for the facility and the maintenance and operating criteria for the odour control unit should be reviewed in light of the increased volumes of waste being accepted at the facility.”
 2. “ A noise impact assessment should be carried out to assess the impact of noise from HGV traffic at night time on sensitive receptors in the vicinity of the site.”

Kind regards,

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)