



Electronic Copy

Mr. Sam Bowden

Mr. Jim O'Callaghan

On behalf of Starrus Eco Holdings Limited

28 November 2023

Reg. No.: W0249-02

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 (Littleton), Ballybeg, Littleton, Tipperary, E41 WP83

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 11 August 2021.

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. 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 from the biofilter.
- c. All required details as set out in section 6 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.

2. Best Available Techniques conclusions [Regulation 9(2)(h)].

In relation to the waste treatment (WT) CID 2018/1147 assessment, submitted as part of the licence review application form:

The following BAT conclusion numbers, BAT 2, BAT 4, BAT 13, BAT 14, BAT 18, BAT 21 do not detail the BAT techniques in the WT CID used at the installation. Where BAT is to use one or a combination of listed techniques, specify the technique(s) implemented/proposed at your installation to achieve the BAT, for example BAT 2 (a), (b) and (c).

3. Provide detail on what are the main waste sources, including list of waste codes to be increased and accepted at the installation.

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIAR 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](mailto:licensing@epa.ie).

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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 \(epa.ie\)](#)

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Please direct any queries to [licensing@epa.ie](mailto:licensing@epa.ie).

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Yours faithfully,



Environmental Licensing Programme  
Office of Environmental Sustainability  
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