

Environmental Licensing Programme
Office of Environmental Sustainability

2nd February 2024

Re: 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/Madam,

I refer the Agency's letter dated 28th November 2023 in accordance with Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013. The requested information is set out herein. The EPA's requests are set out in italics followed by the response.

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.*

It is intended to upgrade the existing odour control system including the biofilter, but the design has not yet been completed. When the design has been finalised the odour impact assessment will be completed based on the design parameters. The target completion date for the odour impact assessment is 31st March 2024

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).

BAT 2 : Procedures for Waste Characterisation (BAT 2a); Waste Acceptance (BAT 2b); Batch Traceability (BAT 2c); Compost Sampling, Verification of ABP processing temperatures, Management of compost in maturation area and testing of compost for physical contaminants (BAT 2d) are in place.

BAT 4: A Waste and Materials Storage Plan has been prepared and it complies with BAT 4 a, BAT 4b and 4 c.

BAT 13 : As the activity is the aerobic treatment of waste other than water-based liquid waste, the measures specified in BAT 36 are implemented.

BAT 14: The odour control measures in place implement BAT 14 d, 14 g and 14 f

BAT 18: Although noise and vibration from installation activities are not a source of off-site nuisance BAT 18 b (i), (ii), (iii), (iv) and (v) are implemented.

BAT 21: An Accident Prevention Plan Is in place. There is a security fence around the entire facility and the entrance gates are locked outside operational hours (BAT 21 a). The following documented procedures are in place: Emergency Response Procedure): Spill Clean UP Procedure (BAT 21 b) Firewater retention capacity is in place. There is a documented procedure in place to record and investigate all environmental incidents and implement appropriate corrective actions (BAT 21 c)

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

The facility will be capable of carrying out two main process types namely; (1) the processing of source segregated 'clean' waste into a product for use in agriculture, and (2) bio-stabilisation and/or bio-drying of mixed municipal waste prior to disposal and/or further processing.

The main waste type accepted into the first process is LoW 200108 biodegradable kitchen and canteen waste. Along with this other compatible clean waste types may be accepted such as residues from the food and drinks and dairy industries. It is currently not envisaged that the facility will carry out this process and in the event that the facility is converted to do so, the agency will be informed, and a list of suitable waste types agreed.

The main waste type accepted into bio-stabilisation and/or bio-drying is mixed municipal waste. In the case of bio-stabilisation the mixed waste is usually screened offsite and the undersize 'organic fines' material enters the facility as LoW code 191212. In the case of bio-drying, the material may or may not have been subjected to significant pre-treatment. Where it has undergone little pre-treatment, it may be classified as LoW 200103.

Other wastes such as waste woodchip, waste from sewage cleaning, screenings and other residues may be blended into the process in relatively small quantities. The below lists the LoW codes proposed to be accepted into the facility. LoW 191212 and 200103 will comprise no less than ninety percent of the total waste accepted in any year and the total waste accepted is limited to 80,000 tonnes per annum. The acceptance of source segregated wastes, such as LoW 20 01 08 biodegradable kitchen and canteen waste are excluded as these wastes can be more beneficially recycled via composting or anaerobic digestion. The List of Waste Codes to be increased are in the Table below

LoW Code	LoW Code Description
03 03 11	Sludges from on-site effluent treatment other than those mentioned in 03 03 10)
16 03 06	Organic wastes other than those mentioned in 160305
10 01 01	Bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
19 05 03	Off-specification compost
19 06 04	Digestate from anaerobic treatment of municipal waste
19 08 01	Screenings
19 08 05	Sludges from treatment of urban waste water
19 09 01	Solid waste from primary filtration and screenings
19 09 04	Spent activated carbon
19 12 07 ¹	Wood other than that mentioned in 191206
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20 03 01	Mixed municipal waste
20 01 25	Edible oil and fat (Grease Trap waste)
20 03 04	Septic tank sludge
20 03 06	Waste from sewage cleaning

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 information does not impinge on the non-technical summary.

Yours faithfully,



Jim O'Callaghan