

UISCE ÉIREANN RESPONSE

Uisce Éireann Colvill House 24/26 Talbot Street Dublin 1

Name of Facility: STARRUS ECO HOLDINGS LIMITED

Reg. No: W0183-03

Location Address: Materials Recovery & Transfer Facility (MRF), Millenium Business Park, Grange, Ballycoolin, Dublin

11, D11PN52

Consent Status: Recommendation granted subject to the consent conditions outlined below

Where consent is granted, indicate Yes or No to the following:

The sewer, to which this consent relates, is vested or controlled by Uisce Éireann.	No
Does the consent constitute a material change with respect to the associated waste water discharge authorisation?	No

Consent Conditions:

- 1. No alteration to, or reconstruction in respect of, the activity, or any part thereof, that would, or is likely to, result in a material change or increase in:
 - the nature or quantity of any emission
 - the abatement/treatment or recovery systems
 - the range of processes to be carried out
 - the fuels, raw materials, intermediates, products or wastes generated, or any changes in
 - site management, infrastructure or control with adverse environmental significance; shall be carried out or commenced without prior notice to, and without the agreement of, the Agency.
- 2. The licensee shall prepare, maintain and implement (text highlighted in black bold for new licence only) / maintain and implement (text highlighted in green bold for reviews) a Schedule of Environmental Objectives and Targets. The Schedule shall, as a minimum, provide for a review of all operations and processes, including an evaluation of practicable options, for energy and resource efficiency, the use of cleaner technology, cleaner production and the prevention, reduction and minimisation of waste and shall include waste reduction targets, reduction and diversion of storm water runoff from sewer. The Schedule shall include time frames for the achievement of set targets and shall address a five-year period as a minimum. The schedule shall be reviewed annually.
- 3. The licensee shall establish, maintain and implement a detailed programme for maintenance of all plant and equipment based on the instructions issued by the manufacturer/supplier or installer of the equipment.
- 4. Silt Traps and Oil Separators

The Licensee shall, within six months of date of grant of this licence Install and maintain silt traps and oil separators at the facility/installation:

- Silt traps to ensure that all storm water discharges, other than from roofs, from the facility/installation pass through a silt trap in advance of discharge;
- An oil separator on the storm water discharge from yard areas.



The separator shall be a Class I or Class II full retention/by-pass separator.

The silt traps and separator shall be in accordance with I.S. EN-858-2: 2003

(separator systems for light liquids).

- 5. No specified emission from the installation shall exceed the emission limit values set out in Schedule B: Emission Limits, of this licence. There shall be no other emissions of environmental significance.
- 6. Other than the trade effluent authorised to be discharged under this licence, the licensee shall at no time discharge or cause or permit to discharge into sewer trade effluent or any other matter unless authorised in writing by Uisce Éireann.
- 7. The licensee shall carry out such sampling, analyses, measurements, examinations, maintenance and calibrations as set out below and as in accordance with Schedule C: Control & Monitoring, of this licence.
 - (i) Sampling and analysis shall be undertaken by competent staff in accordance with documented operating procedures.
 - (ii) Such procedures shall be subject to a programme of Analytical Quality Control using appropriate control standards with evaluation of test responses.
 - (iii) Where any analysis is sub-contracted it shall be outsourced to a competent laboratory.
- 8. Monitoring and analysis equipment shall be installed, operated and maintained as necessary, so that all monitoring accurately reflects the emission/discharge.
- 9. In the event of any incident which relates to discharges to sewer having taken place, the licensee shall notify Uisce Éireann and the Local Authority, in the manner prescribed by Uisce Éireann, as soon as practicable after such an incident.
- 10. The licensee shall pay to Uisce Éireann such sum as may be determined from time to time, having regard to the variations in the cost of providing drainage and the variation in effluent reception, treatment, monitoring, sampling and analysis costs. Payment is to be made on demand from Uisce Éireann.
- 11. The licensee shall ensure that any trade effluent generated from canteen activities shall pass through appropriate grease removal equipment prior to discharge to sewer.
- 12. A summary report of volumes of trade effluent and other matter discharged to the sewer along with monitoring and analysis data as specified in Schedule B: Emission Limits to Sewer and Schedule C: Control & Monitoring, of this licence shall be forwarded to both Uisce Éireann and the Local Authority in a manner and timeframe as may be specified by Uisce Éireann.
- 13. The licensee shall conclude an End User Agreement with Uisce Éireann. (End user Agreement to be inserted into the glossary: An agreement between the licensee and Uisce Éireann which provides for the contractual conditions and arrangements (outside the terms and conditions set out in this licence) relating to the acceptance of, and treatment by, Uisce Éireann of the licensee's trade effluent and wastewater.)
- 14. The licensee shall undertake a desktop assessment and subsequent screening of trade effluent generated as a result of onsite activities for priority substances, priority hazardous substances and watchlist substances as listed in Tables 11,12 & 13 of S.I. No. 272/2009 EC Environmental Objectives (Surface Waters) Regulations 2009, as amended. A report on the assessment and screening shall be submitted to Uisce Éireann within twelve months of the date of grant of this licence.

The licensee shall ensure that where substances are identified as being present in the trade effluent, measures are taken to reduce, eliminate or phase out their emission as required and each are assessed against risks posed to the biological processes at the receiving Uisce Éireann wastewater treatment plant and the sludge generated at the plant. The licensee shall also ensure that identified substances are assessed against potential risks to public health and the whole aquatic environment. The environmental assessment shall specifically assess resultant concentrations of substances in the receiving environment against their applicable environmental quality standards (EQS) and environmental objectives established by S.I. No. 272/2009.

Subsequent desktop assessments, screenings and reports shall be repeated at intervals commensurate with changes to the characteristics of trade effluent as a result of the use of new raw materials (including cleaning/inactivation chemicals) in manufacturing processes onsite or as requested by Uisce Éireann.



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Emission Limit Values for Process Effluent

Schedule B

Emission to: sewer located at Millenium Business Park

Discharge Point Reference No.	SE1					
Parameter		Er	nission L	imit Valu	ies	
Flow Rate			10 m	3/day		
Flow Rate			5 m3	/hour		
Temperature			42	°C		
рН			6 - 10 p	oH units		
Toxicity	10 T.U.'s					
	Concentration (24 Hr. Composite Sample) Concentration (Instantaneous Grab)		Max Load			
BOD, 5 days with Inhibition (Carbonaceous BOD)	2000	mg/l	4000	mg/l	20	Kg/day
COD-Cr	4000	mg/l	8000	mg/l	40	Kg/day
Suspended Solids	1000	mg/l	1500	mg/l	10	Kg/day
Fats, Oils & Greases	100	mg/l	100	mg/l	1	Kg/day
Total Phosphorus (as P)	15	mg/l	15	mg/l	0.2	Kg/day
Total Nitrogen	50	mg/l	50	mg/l	0.5	Kg/day
Ammonia-Total (as N)	35	mg/l	35	mg/l	0.4	Kg/day
Sulphate	1000	mg/l	1000	mg/l	10	Kg/day
Anionic surfactants / Detergents (MBAs)	100	mg/l	100	mg/l	1	Kg/day
Chloride	1000	mg/l	1000	mg/l	10	Kg/day
Total Petroleum Hydrocarbons	5	mg/l	5	mg/l	0.05	Kg/day
Mineral oils	10	mg/l	10	mg/l	0.1	Kg/day
Cadmium - filtered	0.005	mg/l	0.005	mg/l	0.001	Kg/day
Chromium - filtered	0.5	mg/l	0.5	mg/l	0.005	Kg/day
Copper - filtered	0.5	mg/l	0.5	mg/l	0.005	Kg/day
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Lead - filtered	0.3	mg/l	0.3	mg/l	0.003	Kg/day
Mercury - filtered	0.001	mg/l	0.001	mg/l	0.001	Kg/day
Nickel - filtered	0.5	mg/l	0.5	mg/l	0.005	Kg/day
Phenols	0.5	mg/l	0.5	mg/l	0.005	Kg/day
Silver - filtered	2	mg/l	2	mg/l	0.2	Kg/day
Zinc - filtered	2.5	mg/l	2.5	mg/l	0.025	Kg/day
Total Heavy Metals	10	mg/l	10	mg/l	0.1	Kg/day



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Frequency of Monitoring for Process Effluent

Schedule C

Discharge Point Reference No.	SE1			
Parameter	Monitoring Frequency ^{Note1}	Methodology		
Flow Rate	Continuous	On-line flow meter with recorder		
Temperature	Bi-monthly	Temperature probe		
pH	Bi-monthly	pH electrode/meter & recorder		
BOD, 5 days with Inhibition (Carbonaceous BOD)	Bi-monthly	Standard Methods		
COD-Cr	Bi-monthly	Standard Methods		
Suspended Solids	Bi-monthly	Standard Methods		
Fats, Oils & Greases	Bi-monthly	Standard Methods		
Total Phosphorus (as P)	Bi-monthly	Standard Methods		
Total Nitrogen	Bi-monthly	Standard Methods		
Ammonia-Total (as N)	Bi-monthly	Standard Methods		
Sulphate	Bi-monthly	Standard Methods		
Anionic surfactants / Detergents (MBAs)	Bi-monthly	Standard Methods		
Chloride	Bi-monthly	Standard Methods		
Total Petroleum Hydrocarbons	Bi-monthly	Standard Methods		
Mineral oils	Bi-monthly	Standard Methods		
Cadmium - filtered	Annually	Standard Methods		
Chromium - filtered	Annually	Standard Methods		
Copper - filtered	Annually	Standard Methods		
Lead - filtered	Annually	Standard Methods		
Mercury - filtered	Annually	Standard Methods		
Nickel - filtered	Annually	Standard Methods		
Phenols	Annually	Standard Methods		
Silver - filtered	Annually	Standard Methods		
Zinc - filtered	Annually	Standard Methods		
Total Heavy Metals	Annually	Standard Methods		



Respirometry	As Requested	Standard Methods		
Toxicity	As Requested	Standard Methods (Note 2)		

Note 1: Sampling shall take place on alternate weekdays on a rolling basis to ensure representative samples are obtained for site operations which may vary across the working week. Note 2: Toxicity Units (TU) are defined as: TU=(100x Hour EC50) where X is the relevant period of exposure and EC50 is expressed as % vol/vol.



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Control of Emissions to Sewer

Description of treatment: wastewater treatment.

Control Parameter	Monitoring	Key Equipment	
Flow Rate	Continuous	Online flow meter with recorder (Note 1)	
рН	Continuous	pH electrode/ meter & recorder (Note 1)	
Temperature	Continuous	Online temperature probe with recorder (Note 1)	
Fats, Oils & Greases	Continuous	Grease Removal Equipment (Note 1 & 2)	
Suspended Solids	Continuous	Silt Traps (Note 1)	
Total Petroleum Hydrocarbons	Continuous	Class II Full Retention Oil Interceptor (Note 1)	

Note 1: The licensee shall maintain appropriate access to standby and/or spares to ensure the operation of the abatement system. Note 2: Grease removal equipment shall comply with the requirements of European Standards (EN) or Plumbing and Drainage Institute (PDI) standards or as otherwise specified by Uisce Éireann.

Yours sincerely,		
Amer Comply		
	_ Date:	13/May/2024
Ronan Connolly		
Uisce Éireann		