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On behalf of Starrus Eco Holdings Limited

06 November 2024

Reg. No.: W0183-03

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 (Millenium Business Park), Millennium Business Park, Grange, Ballycoolin, Dublin 11, Dublin, D11 PN52

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 25 August 2023.

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)]

- a. Confirm the individual volumes of MP1 and MP2. If it is proposed to extract air in combination from MP1 and MP2 confirm that the model submitted takes into account the correct building volumes.
- b. Submit a cumulative assessment of the impact of industrial installations/waste facilities emissions sources in the region or justify why a cumulative assessment is not required.

2. Odour Control Unit [Regulation 9(2)(k)]

- a. Provide details on the odour control unit to be installed at the installation.
- b. Clarify whether the emission point A2-1 has appropriate access for monitoring.

3. Waste Acceptance [Regulation 9(2)(t)]

- a. Provide the list of waste (LoW) code under which you intend to accept "Sterilized Medical Waste".

- b. The submitted waste storage plan provides a bay for material with waste code 19 05 01 – “non-composted fraction of municipal and similar wastes”. Clarify if this waste is being accepted or generated on site.
  - c. Provide the list of waste (LoW) code under which you intend to accept C&I lighting and confirm that material accepted will be non-hazardous.
  - d. Provide a precise breakdown of all wastes to be increased and accepted at the installation including list of waste (LoW) codes and confirm that the requested increase in food waste and mixed household waste does not contravene Condition 2(a) of the granted planning permission (ABP-316027-23).
4. Groundwater [Regulation 9(2)(j)].
- a. Confirm whether groundwater for use at the installation is abstracted from an on-site groundwater well and provide its location.
  - b. Provide details on what the abstracted groundwater is used for at the installation.
  - c. Clarify whether your abstraction is less than 25 cubic meters (25,000 litres) of water per day.
5. Map (Regulation 9(4)(d))  
Provide a map of the installation that clearly identifies all the emission points on-site (e.g. storm water, air and dust monitoring locations).
6. Stakeholder Engagement [Regulation 9(2)(g)]  
Section 6.1 of the application states that there is a trade effluent discharge to sewer, clarify if an “Effluent Discharge License” is held and supply a copy if applicable.
7. 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;
- a. The Agency notes that an odour control unit is to be installed the installation. The BAT assessment section of your application form states that BAT 10 is not applicable, BAT 10 related to monitoring odour emissions. Clarify why BAT 10 is not applicable or if applicable, provide information on how you will comply with BAT 10.

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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Note that where the licensee fails to comply with this requirement in full and to the satisfaction of the Agency, the Agency may consider, having regard to the extent of the failure, whether the application can be considered pursuant to Regulation 10(2)(b)(ii) of the Environmental Protection Agency (Industrial Emissions)(Licensing) Regulations 2013 as amended may issue a notice in writing that the application cannot be considered by the Agency, outlining the extent of such failure. Alternatively, where there is a failure to comply with this requirement the Agency may activate Regulation 19 of the EPA (Industrial Emissions)(Licensing) Regulation 2013, which pertains to Withdrawal or Abandonment of an application for licence.

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

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Yours Sincerely,



Darragh Hearne

Circular Economy Programme

Office of Environmental Sustainability

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