

Submission

Submitter:	Mrs Lara Duffy
Organisation Name:	HSE Environmental Health Service
Submission Title:	HSE Comments and cover letter
Submission Reference No.:	S009925
Submission Received:	15 March 2021

Application

Applicant:	K2 Strategic Infrastructure Ireland Limited
Reg. No.:	P1143-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

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Date: 15th March 2021

Our reference: 1603

Report to: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

EPA reference: P1143-01

Type of Consultation: Industrial Emissions

Applicant: K2 Strategic Infrastructure Ireland Limited, 6th Floor, Riverpoint,
Lower Mallow Street, V94 Wc6a, Limerick, Limerick

Nature of Activity:

Classes and Nature of Activity in accordance with the EPA Act 1992 as amended			
Class of Activity	Main Activity	EPA Act Sector (where applicable)	Class of Activity Description
2.1	Yes	Energy	Combustion of fuels in installations with a total rated thermal input of 50 MW or more.

Introduction

The following HSE departments were notified of the consultation request for the licence application on 16th February 2021

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Mellany McLoone

This report only comments on Environmental Health impacts of the licence application.

The Industrial Emissions (IE) Licence is for a data storage facility located in Ballycoolin Business Park, Ballycoolin Road, Blanchardstown, Dublin 15. The data storage facility will provide secure data storage services, and distribution of information to individuals, businesses and organisations. When constructed the facility will consist of two main data storage buildings named North Building and South Building. The development of the site includes an associated office building located to the west of the site, security and utility spaces, on site attenuation, internal road network, and site landscaping

Site Location:

The proposed development site is c. 8.79 hectares of partially greenfield and partially brownfield lands located in the townland of Ballycoolin, in the Ballycoolin Business Park, Blanchardstown, Dublin 15. The existing buildings on site were originally built in the 1990's and most recently used as Call Centres.

The lands are bound to the south by a private estate road, to the southwest by the Ballycoolin Road. There is residential and traveller accommodation to the immediate north-west and two houses directly across Ballycoolin Road to the south-east. To the north by lands in use by Irish Water which are primarily under grass but which accommodate a water tower, and an existing employment building, and to the east by an area of car parking serving an existing office development.

Air Quality:

The EHS assessed the air emissions impact assessment and is satisfied that there will be no major air emissions during the normal operation of the data storage facility. The main source of air emission from the proposed development will be from the 32 diesel powered emergency back-up generators.

In summary, impacts on ambient air quality associated with the standby generators at the proposed development site will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health. However the generators will only be used during abnormal operating in the case of emergencies, the assessment states *"It is anticipated, based on the applicants' experience, that emergency back-up generators will rarely be used. They will be tested periodically to maintain operational readiness."*

The EHS is satisfied with the conclusion in the impact assessment that states, impacts on ambient air quality associated with the standby generators at the proposed development site will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health.

Noise:

The EHS assessed the noise impact assessment submitted to the EPA. The noise impact assessment was based on the operation of two data centres on lands at Ballycoolin Business Park, Ballycoolin Road, Blanchardstown, Dublin 15. AWN Consulting were commissioned to prepare the noise impact assessment for the operation of the facility.

The assessment states that nearest residential locations are located to the north-west and south-west of the development lands. To the north-west, there are 11 single storey residential buildings within St Philomena's Park Halting Site. To the south-west there are four single storey residential dwellings on the opposite side of the Ballycoolin Road. Further west, the land use is industrial.

The baseline noise survey was obtained by monitoring noise levels at two noise sensitive locations in the vicinity of the proposed development site. The results of the survey are discussed in section 2.5 and the results of the two locations are shown in table 2 and 3. The survey states that road traffic noise, both distant and local was noted as the most significant source of noise and typically dictated ambient noise levels at the two monitoring location during daytime and night-time periods. The survey results over all survey periods at both monitoring locations can be found in Table 4.

Section 4 assesses the noise prediction calculations carried out at the nearest noise sensitive locations (NSL's) surrounding the site. A total of 13 NSL's were identified 9 at St Philomena's Park and 4 at Ballycoolin Road.

Six scenarios were used to consider the noise impact of the proposed operations. They were as follows:

South Building:

- Scenario A: Proposed South Data hall only– Day to Day operations.
- Scenario B: Proposed South Data hall only – Emergency Power Operation.
- Scenario C: Proposed South Data hall only – Generator Testing.

North and South Building:

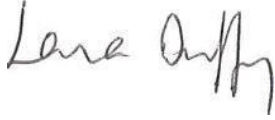
- Scenario D: Proposed North & South Data halls– Day to Day operations.
- Scenario E: Proposed North & South Data halls– Emergency Power Operation.
- Scenario F: Proposed North & South Data halls –Generator Testing.

The modelling results for all six scenarios are presented in Table 9 & 10. The predicted noise levels presented in Tables 9 & 10 for each of the six scenarios were compared to the relevant noise criteria adopted for the assessment and are shown in Tables 11, 12 & 13. All locations comply with the adopted criteria for each of the six scenarios.


The noise impact assessment concludes that *"The predicted noise levels at all NSL's are below the day, evening and night-time noise criteria that are applicable to the site operations"*. However, due to the close proximity of the residential properties at both St Philomena's Park and Ballycoolin Road it is the opinion of the EHS that additional noise monitoring is carried out at the NSL's identified in the noise impact assessment once the proposed development is operational. This is to ensure the local community is protected from noise levels;

- That shall not be so loud, so continuous, so repeated, of such duration or pitch or occurring at such times as to give reasonable cause for annoyance to a person in any residence, adjoining premises or public place in the vicinity; and
- Noise due to the normal operation of the proposed development, expressed as L_{A90} over 15 minutes at the façade of the noise sensitive locations identified in the noise impact assessment, shall not exceed the daytime background level by more than 10 dB(A) and shall not exceed the background level for evening and night time. The noise levels from the proposed development should be assessed against the baseline noise level survey outlined in the noise impact assessment.

All correspondence or any queries with regard to this report, including acknowledgement of this report, should be forwarded to Ms. Geraldine O Callaghan, Principal Environmental Health Officer, at the above address



pp. Geraldine O Callaghan
Principal Environmental Health Officer



Thomas Mangan
Environmental Health Officer
Environment OU

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Dear Sir/Madam

Please find enclosed the HSE consultation reports in relation to the above planning application. If you have any queries regarding any of this report the initial contact is Ms Geraldine O Callaghan, Principal Environmental Health Officer, who will refer your query to the appropriate person

Yours faithfully,

pp. Geraldine O Callaghan
Principal Environmental Health Officer