



Submission

Submitter:	Miss Fiona Byrne
Organisation Name:	HSE Environmental Health
Submission Title:	P1186-02
Submission Reference No.:	S011750
Submission Received:	23 September 2024

Application

Applicant:	Amazon Data Services Ireland Limited
Reg. No.:	P1186-02

See below for Submission details.

Attachments are displayed on the following page(s).



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health
Health Service Executive
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Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Date: 12th September 2024

Type of consultation: Combustion of fuels in installations with a total rated thermal input of 50 MW or more.

EHIS Reference: 4151

Dear Sir/Madam

Please find enclosed the HSE consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on the 19th August 2024

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore /Ina Kelly
- CHO – Mellany McLoone

Please find enclosed the HSE submission re the above Environmental Licence. If you have any queries regarding this report the initial point of contact is, Fiona Byrne Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours sincerely

A handwritten signature in black ink that reads "Fiona Byrne".

Fiona Byrne
Principal Environmental Health Officer

Environmental Health Service Consultation Report

(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)

Report to: Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Date: 12.09.24

Type of consultation: *Industrial Emissions*

Planning Authority: *Dublin*

EPA Reference Number: P1186-02

EHIS Reference number: 4151

Applicant: Amazon Data Services Ireland Limited, One Burlington Plaza, Burlington Road, Dublin 4, D04RH96, Dublin 4, Dublin

Location of development: Clonshaugh Business and Technology Park, Dublin 17, Dublin, D17 V303

General Comments:

Details of the application were circulated to HSE stakeholders on the 19th August 2024

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O' Moore /Ina Kelly
- CHO – Mellany McLoone

This report only comments on Environmental Health impacts of the license application. All commitments to future actions, including mitigation and further testing have been taken as read, and all data has been accepted as accurate. No additional investigations/measurements were undertaken in the review of the application.

In respect of this application, the areas reviewed were those of concern to Environmental Health and which are:

- Any potential contamination of surface water and ground water
- Emissions to air including noise and process emissions

General

Amazon Data Services Ireland Ltd is applying to the Environmental Protection Agency (EPA) for a review of an Industrial Emissions (IE) Licence (EPA Licence Ref P1186-01) for the data storage facility located in Clonshaugh Business and Technology Park, Clonshaugh, Dublin 17.

The Installation provides secure data storage services, and distribution of information to individuals, businesses and organisations. The application relates to the overall Installation, which includes the existing licensed Installation and the extension to the Installation and covers 9.963 hectares (ha) in total.

The extended Installation consists of 2 no. 2-storey data storage facilities containing data storage rooms, electrical and mechanical plant rooms and support areas including offices and welfare facilities, loading bays, back-up generators with emission stacks, water storage tanks, and mechanical plant and solar panels at roof level. Both buildings have mezzanine levels.

Site Location

Clonshaugh Business and Technology Park managed by IDA lies approximately 6.5km north of Dublin's city centre and 3km south of Dublin Airport. Access to and from the Park at present is from Oscar Traynor Road. The Installation is located on a site of c. 9.963 hectares within the IDA Park, approximately 50 m from Oscar Traynor Road. The IDA Park accommodates a range of technology and industrial type uses. developments within this business park are similar 'individual lot' type developments.

The closest occupied residential properties are located east of the development along the Clonshaugh Road at a distance of approximately 140m from the site boundary

The surrounding 1 km of the site includes IE and IPC Licenced sites including:

- Forest Laboratories Ireland Limited (P0306-03), located to the immediate west of the site;
- Global Switch Property Ltd (P0109-01), located to the north of the site within the Clonshaugh Business and Technology Park;
- ADSIL (P1171-01), located to the north of the site within the Clonshaugh Business and Technology Park;

Air Quality

The National Environmental Health Service (NEHS) has assessed the air impact assessment and is satisfied that there will be no significant emissions to air during the normal operation of the facility. As per the Attachment-7-1-3-2-Air Emissions Report it has concluded that:

In summary, emissions to atmosphere of NO₂, as the main polluting substance (as defined in the Schedule of EPA (Industrial Emissions) (Licensing) Regulations 2013, S.I. No. 137 of 2013) from the standby generators, will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health. Therefore, no significant impacts to the ambient air quality environment are predicted.

The NEHS is satisfied with the conclusion of the Air Emissions Impact Assessment which states that impacts on ambient air quality associated with the proposal at the proposed Amazon facility will be in compliance with the ambient air quality standards which are based on the protection of the environment and human health.

Noise

The NEHS has considered the Noise Impact Assessment submitted by the applicant which was prepared by Awn Consulting. The nearest residential noise sensitive locations are to the east of the development along the Clonshaugh Road at a distance of approximately 140m from the site boundary. There are also residential dwellings to the west of the site within the Larch Hill development at a distance of approximately 300m from the site boundary, and within the Cromcastle Estate to the south of the site at a distance of approximately 250m from the site boundary. In addition, there are a number of commercial and industrial operations located on lands to the north, east, south and west of the site.

This proposed site is not located in an area designated as a "Quiet Area"

A baseline noise survey was undertaken by monitoring noise levels were conducted at seven positions in the vicinity of the site. Monitoring was undertaken during daytime, evenings, and night time periods.

The monitoring survey results are outlined in Attachment 7-1-3-2 Noise Emissions Impact Assessment and included in Tables 2 – 9. Road Traffic Noise, aircraft movements and some existing industry plant were the most significant daytime noise sources at each of the seven locations. Road Traffic noise was the most dominant night time noise source. The predicted noise levels at all NSL's have been outlined as per the report is "*below the day, evening and night-time noise criteria that are applicable to the site operations*". The modelling results for each of the seven scenarios are included in Tables 13- 16 and all locations were found to comply with the adopted criteria for each of the scenario's.

The NEHS notes as per the Attachment 7-1-3-2 Noise Emissions Impact Assessment it is proposed to under take annual daytime, evenings, and night time monitoring at Noise Sensitive Locations.

Due to the number and proximity of residential commercial and industrial operations located and surrounding area to include Clonshaugh Business and Technology Park, the National Environmental Health Service recommends the additional noise monitoring (daytime, evening and night-time) is undertaken. This is in order to ensure that any cumulative noise impacts have been addressed by proposed mitigation measures and is recommended for the protection of public health.

Surface Water and Ground Emissions Impact Assessment

The Site is within the catchment of the Santry River which runs approximately 50m south of the site flowing in an easterly direction toward North Dublin Bay. There are no streams on the site itself or along its boundaries. Stormwater run-off is collected and discharged to the public storm sewer which eventually discharges to the Santry River.

There is one water quality monitoring station located on the Santry River downstream of the proposed site which has quality ratings available within the last ten years. This monitoring

location (Clonshaugh Road Bridge RS09S010300) obtained a Q rating of 2-3 - Poor Status (in 2022).

There is also a station downstream on the River Mayne at the Hole-in-the-Wall Bridge (RS09M030500). This also obtained a Q rating of 2-3 (in 2022) which also denotes a "poor" rating for the same period.

Currently, the EPA classifies the WFD Ecological Status for the Santry River as having 'Poor Status' (Cycle Status 2016 - 2021) with a current WFD River Waterbody risk of 'At risk of not achieving good status' for both rivers'.

In accordance with the Attachment 7-1-3-2 Soil & Water Impact Assessment, Section 3 *"the installation has no proposed direct emissions to ground or ground water. The only potential impact of the installation to ground and ground water would be from indirect emissions from fuel and other accidental spills that may occur."*

However, there may be a potential for leaks and spillages from the fuel tank to occur on site. Therefore the NEHS would recommend that mitigation measures with respect to surface water pollution controls in Section 2.4 and Emissions to Ground and Abatement Measures 3.3 should be considered by the EPA as part as licencing conditions.

Such mitigation measures shall include:

- In order to minimise any impact on the underlying subsurface strata from material spillages, the fuel storage tanks are located above ground, there will be full containment and all containers are designed to be suitable for the chemicals stored within and in accordance with the EPA's guidelines for the storage and transfer of materials for scheduled activities (EPA, 2004).
- The design of all bunds conforms to standard bunding specifications - BS EN 1992-3:2006 Eurocode 2 - Design of concrete structures - Part 3: Liquid retaining and containment structures. The Operational Report (Attachment 4.8.1) outlines the fuel storage systems in detail.
- A standard operating procedure for fuel unloading is in place at the Site to reduce the risk of spills
- On-site Emergency Response Plan (ERP) is in place and the Site maintains spill kits at all storage areas,

The NEHS is satisfied with the conclusion of the Surface Water and Ground Emissions Impact Assessment that concluded, *"There is no direct discharge, and no direct pathway to groundwater from this site, there is no likely potential impact on the soil environment or underlying groundwater body."*

Arlene Ward

Arlene Ward
Environmental Health Officer