

Mr Ronan Connolly
On behalf of Irish Water



20 January 2022

Reg. No. P1170-01

Re: Section 99E of the EPA Act as amended, in respect of a licence application from Amazon Data Services Ireland Limited for an installation located at Grange Castle South Business Park, Baldonnel Road, Dublin 22.

Dear Sir,

The EPA has received an application from the above referenced applicant Amazon Data Services Ireland Limited.

The applicant proposes, as part of this application, to provide for the discharge of process effluent to your sewer. Process effluent includes trade effluent or other matter (other than domestic sewage or storm water). Details of the proposed emissions to the sewer are contained in the “Emissions – Sewer Section” Template of the Online Application which can be viewed at www.epa.ie.

I would appreciate if you could confirm whether or not an Order under Section 22 of the Local Government (Water Pollution) (Amendment) Act, 1990, was made and confirmed by Irish Water, in respect of this sewer, and if so, could you please furnish the EPA with a copy of same.

I am to request your consent to the proposed discharge under Section 99E of the EPA Act as amended. I should also add that in accordance with the legislation, your consent may be subject to such conditions as Irish Water considers appropriate. For your convenience please find attached a reply form including a list of draft conditions compiled by the EPA.

In accordance with the legislation, you are requested to forward your response within 5 weeks of the date of this letter. Please note that any decision given after the expiry period shall be invalid and in those circumstances the EPA may proceed to grant the licence concerned as if consent was obtained.

Please email any further queries to licensing@epa.ie.

Yours faithfully,

Environmental Licensing Programme
Office of Environmental Sustainability
Tel: 053 – 9160600

IRISH WATER RESPONSE

Irish Water
Colvill House
24/26 Talbot Street
Dublin 1

Name of Facility: Amazon Data Services Ireland Limited
01

Reg. No: P1170-

Location Address: Grange Castle South Business Park, Baldonnell Road, Dublin 22, Dublin,
Dublin, D22 E7C9

Consent: Indicate Yes to one of the following statements:

Consent granted subject to the consent conditions outlined below.	
Consent granted without conditions.	
Consent refused ^{Note 1} .	

Note 1 Where it is proposed to refuse permission the reasons for the refusal should be clearly outlined in the response.

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

The sewer, to which this consent relates, is vested or controlled by Irish Water.	
Does the consent constitute a material change with respect to the associated waste water discharge authorisation? ^{Note 2} (If 'Yes', you must attach to the consent a document describing the measures to be taken to bring about compliance with the waste water discharge authorisation including timeframes where appropriate.	

Note 2 You are referred to the EPA Guidance for Irish Water on Requests for Alterations to a Waste Water Discharge Licence or Certificate of Authorisation

Consent Conditions

For your information, the following conditions relating to emissions to sewer are typically included in a licence granted by the Agency. Please note bold/green text is optional and will be included as appropriate to the circumstances.

GENERAL 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:
 - i. the nature or quantity of any emission;
 - ii. the abatement/treatment or recovery systems;
 - iii. the range of processes to be carried out;
 - iv. 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** (text highlighted in black bold for new licences only) / **maintain and implement** (text highlighted in green bold for reviews only) 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/**Class II full retention/by-pass separator. <<EPA to select as**

appropriate>>

- a. 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 Irish Water.

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.

- Sampling and analysis shall be undertaken by competent staff in accordance with documented operating procedures.
- Such procedures shall be subject to a programme of Analytical Quality Control using appropriate control standards with evaluation of test responses.
- 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 **Irish Water and the Local Authority**, in the manner prescribed by Irish Water, as soon as practicable after such an incident.

10. The licensee shall pay to Irish Water 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 Irish Water**.

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. *Inclusion of note in Schedule C Control of Emissions to sewer*

Note: Grease removal equipment shall comply with EN or PDI standards or as otherwise specified by Irish Water.

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 Irish Water and the Local Authority in a manner and timeframe as may be specified by Irish Water.

13. The licensee shall conclude an End User Agreement with Irish Water.

(End user Agreement to be inserted into the glossary: An agreement between the licensee and Irish Water 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, Irish Water of the licensee's trade effluent and wastewater.)

ADDITIONAL GENERAL CONSENT CONDITIONS

**In respect of discharges or emissions to sewers, in accordance with Section 99E
of the Environmental Protection Agency Act 1992, as amended.**

(Specify, if required)

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Limit Values for Process Effluent to Sewer

Schedule B: Emission Limits

Emission point reference no: _____

Emission to **(sewer description)**: _____

Volume to be emitted: Maximum in any one day : _____ m³

Maximum rate per hour : _____ m³

Parameter <i>(delete parameters which are not applicable)</i>	Emission Limit Value	
	Daily Mean Concentration (mg/l)	Daily Mean Loading (kg/day)
BOD		
COD		
Suspended Solids		
pH		
Temperature		
ADDITIONAL PARAMETERS <i>(if required) Note 1</i>		

Note 1: Where additional parameters are requested these shall allow for direct monitoring by CEN, ISO, national or international standards where possible.

Frequency of Monitoring Process Effluent to Sewer

Schedule C

Emission point reference no: _____

Parameter <i>(delete parameters which are not applicable)</i>	Monitoring Frequency <i>(e.g. monthly, quarterly, annually)</i>	Sample Type <i>(grab, composite)</i>
Flow to sewer		
Temperature		
pH		
BOD		
COD		
Suspended Solids		
ADDITIONAL PARAMETERS <small>Note 1</small> <i>(if required)</i>		

Note 1: Where additional parameters are requested these shall allow for direct monitoring by CEN, ISO, national or international standards where possible.

Control of Emissions to Sewer

Description of treatment:

Control Parameter	Monitoring	Key Equipment

Description of treatment: Removal of Fats, Oil and Grease generated as a result of any canteen activities

Control Parameter	Monitoring	Key Equipment ^{Note 1}
Fats, oil and grease removal	Fats, oil and grease content in trade effluent as a result of canteen activities.	Grease removal equipment.

Note 1: Grease removal equipment shall comply with the requirements of European Standards (EN) or Plumbing and Drainage Institute (PDI) standards or as otherwise specified by Irish Water.

Signed on behalf of

Date _____