

This Report has been cleared for submission to the Director by Programme Manager, Marie O'Connor

Signed: Marie O'Connor Date: 6th March 2023

 <p>Environmental Protection Agency An Ghníomhaireacht um Chaomnú Comhshaoil</p>	OFFICE OF ENVIRONMENTAL SUSTAINABILITY
MEMORANDUM	
TO:	DIRECTOR
FROM:	Jim Johnson Environmental Licensing Programme
DATE:	06 March 2023
RE:	Application for an Industrial Emissions Licence Application, licence register number P1189-01 – Submission of Confidential Information
Applicant:	Google Ireland Limited
CRO number:	368047
Location/address:	Grange Castle Business Park South, Baldonnell Rd, Dublin, D22 X602
Application date:	25 November 2022
Classes of Activity (under EPA Act 1992 as amended):	2.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more.
Category/ies of activity under IED (2010/75/EU):	1.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more

Background

Google Ireland Limited (hereafter 'the applicant') has applied for an Industrial Emissions licence (P1189-01) for the operation of a data facility located at Grange Castle Business Park South, Baldonnell Rd, Dublin, D22 X602. The facility includes back-up diesel generators with a thermal input capacity equal to or greater than 50 MW.

Request

On 23 November 2022, as part of the licence application, the applicant submitted with cover letters, documents marked as 'confidential'. The following information was marked as confidential in the documents:

- Electricity usage
- Quantity of diesel stored and used

- Rated Thermal Input of Combustion Plant at the site

The applicant has stated that the information is commercially sensitive and if made public they would lose their market edge with regard to energy usage and optimisation of operations.

Assessment

The information marked confidential is not available on the public file, it is not included in the relevant attachments of the application.

The information marked confidential is necessary for processing the application. The quantities of electricity and diesel usage are required under Regulation 9 of the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013 (S.I. No. 137/2013). This information is necessary for the Agency to determine the environmental impact of the activity, to evaluate whether best available techniques are being used as well as to carry out an Environmental Impact Assessment (EIA) of the activity¹. The capacity of the individual combustion plant is necessary to assess compliance with the Medium Combustion Plant Regulations (S.I. No. 595 of 2017).

I have assessed the information and considers that it is Partially Confidential for the following reasons:

I have assessed the information and consider that the quantities of diesel and electricity (energy) usage should be considered Not Confidential. The quantities of diesel and electricity (energy) usage are a key consideration in the assessment of the activity and the public should have access to this information in order to be able to fully participate in the decision-making process related to the issuing of an industrial emissions licence for the activity.

I do not consider the capacity of individual combustion plant necessary to be made publicly available as the emissions and resources used are fully characterised and assessed in the application. However, I recommend that the range of the thermal input capacity for individual generators (1-5MW, 5-20MW, 20-50MW) be included in the public file in keeping with that published on the MCP Register on the EPA website.

Recommendation

Following assessment of this information, I consider this information is necessary for the processing of the application.

I recommend that the information be deemed Partially Confidential, and that the Applicant be informed that the information is deemed Partially Confidential and therefore those documents will NOT be placed on the public file but retained in a secure manner by the EPA for assessment as part of the Application.

Signed: *Jim Johnson*

Jim Johnson
Inspector

Date: 01 March 2023

¹EPA 2022 Guidelines on the information to be contained in Environmental Impact Assessment Reports