



Amazon Data Services Ireland Ltd.

Operational Report

Attachment-4-8-1

July 2024

Licence Application (LA011866)

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1.0 REPORT INTRODUCTION AND PURPOSE OF IE LICENCE REVIEW

This Operational Report relates to the Amazon Data Services Ireland Ltd. (“ADSIL” or ‘the applicant’) data storage facility (the subject ‘installation’ under this Industrial Emissions (IE) Licence review application) located in Clonshaugh Business and Technology Park, Clonshaugh, Dublin 17.

This IE Licence review relates to the extension of the existing Installation (Licence P1186-01) from 7.9 ha to c. 9.963 hectares (ha) (‘the Site’). The site layout is shown on Drawing 21_123F-CSE-00-XX-DR-C-0002 - Site Layout Plan included with this application.

1.1 SITE OVERVIEW

The existing Installation (Licence P1186-01) comprises the following: 3 no. 2-storey data storage installation buildings with mezzanine floors at each level (Buildings W, X and Y) and ancillary elements. Building X and Y consists of a 2-storey building connected via link corridor and share loading bay and offices. The ancillary elements of the development include; loading bays, maintenance and storage spaces, associated water tanks, sprinkler tanks, pump house and electrical rooms, security and utility spaces, underground foul and storm water drainage network, attenuation storm cells, internal roading network, and site landscaping. The site includes the Newbury 110 kV Substation that is constructed on lands held by ADSIL under lease.

The extended Installation comprises the following additional elements: 2 no. 2-storey data storage installation buildings with mezzanine floors at each level (Buildings U and V) and ancillary elements. The ancillary elements of the development include; loading bays, maintenance and storage spaces, office administration areas, electrical and mechanical plant rooms with plant at roof level, sprinkler tank and pump house, security and utility spaces, underground foul and storm water drainage network, attenuation storm cell, internal road network with car and cycle parking, and site landscaping. Building U has solar panels at roof level.

The Installation requires a continuous supply of electricity to operate. During normal operations, the facility is supplied electricity from the national grid. Outside of normal operations, the facility is first supplied electricity by some or all of the onsite battery installations and then by some or all of the onsite emergency back-up generators. Outside of routine testing and maintenance, the operation of these emergency back-up generators is typically only required under the following emergency circumstances:

- A loss, reduction or instability of grid power supply,
- Critical maintenance to power systems,
- A request from the utility supplier (or third party acting on its behalf) to reduce grid electricity load.

The existing Installation (Buildings W, X and Y) comprises 40 no. 5.44 Megawatt Thermal Input (MW_{th}) emergency back-up generators, 2 no. 0.337 MW_{th} fire sprinkler pumps and 2 no. 0.423 MW_{th} fire sprinkler pumps.

The extended Installation (Buildings U and V) once fully operational will have installed 10 no. 6.49 MW_{th} emergency back-up generators, 1 no. 3.6 MW_{th} emergency back-up generator, 1 no. 2.19 MW_{th} emergency back-up generator, and 2 no. 0.57 MW_{th} fire sprinkler pumps.

The relevant requirement for an Industrial Emissions (IE) Licence is outlined within the First Schedule of the EPA Act 1992. Activity 'Class 2.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more' specifically relates to this facility.

The combined thermal input from the emergency back-up generators is 290.95 MW_{th}, comprising 219.12 MW_{th} from the existing Installation and 71.83 MW_{th} from the extended Installation. This exceeds the 50MW_{th} threshold of Class 2.1 First Schedule of the EPA Act 1992. The IE Licence principally relates to the operation of emergency standby generators under Activity Class 2.1.

The current IE licence has up to 100 personnel on site daily, approximately 50 personnel at each Building W, and 50 personnel at Building X and Building Y; including external staff, maintenance contractors and visitors. Staff are present on a shift basis, so numbers vary throughout the day. Operational hours are 24 hours a day, 7 days a week. There will be an additional 50 personnel present on site at Buildings U and V, with a total Site personnel of approximately 150. Operational hours are 24 hours a day, 7 days a week and shift patterns are similar to the current Site operations.

The layout of the existing Installation is shown in Figure 1.1 and the extended Installation is shown in Figure 1.2.

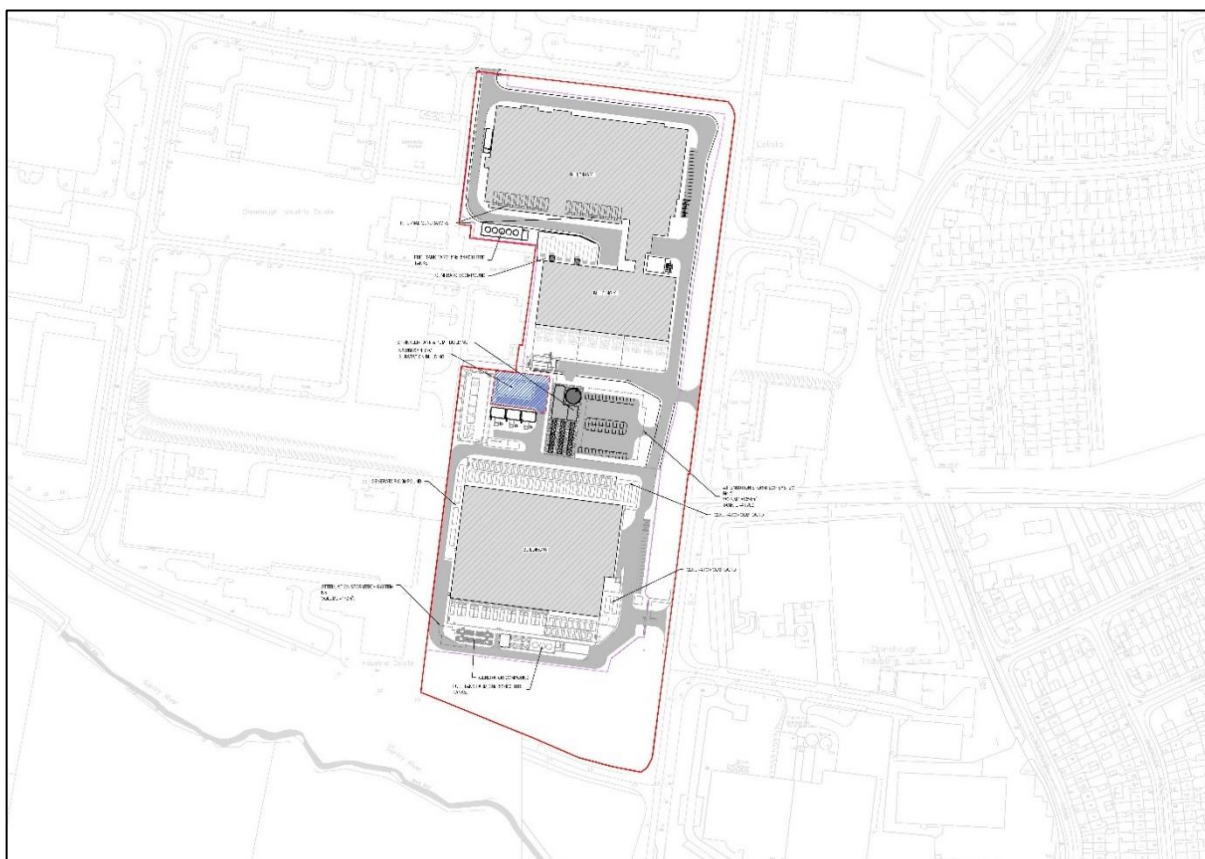


Figure 1.1 Site Layout (existing Installation refer to Drawing 21_123F-CSE-00-XX-DR-C-0002 - Site Layout Plan (Rev C02))

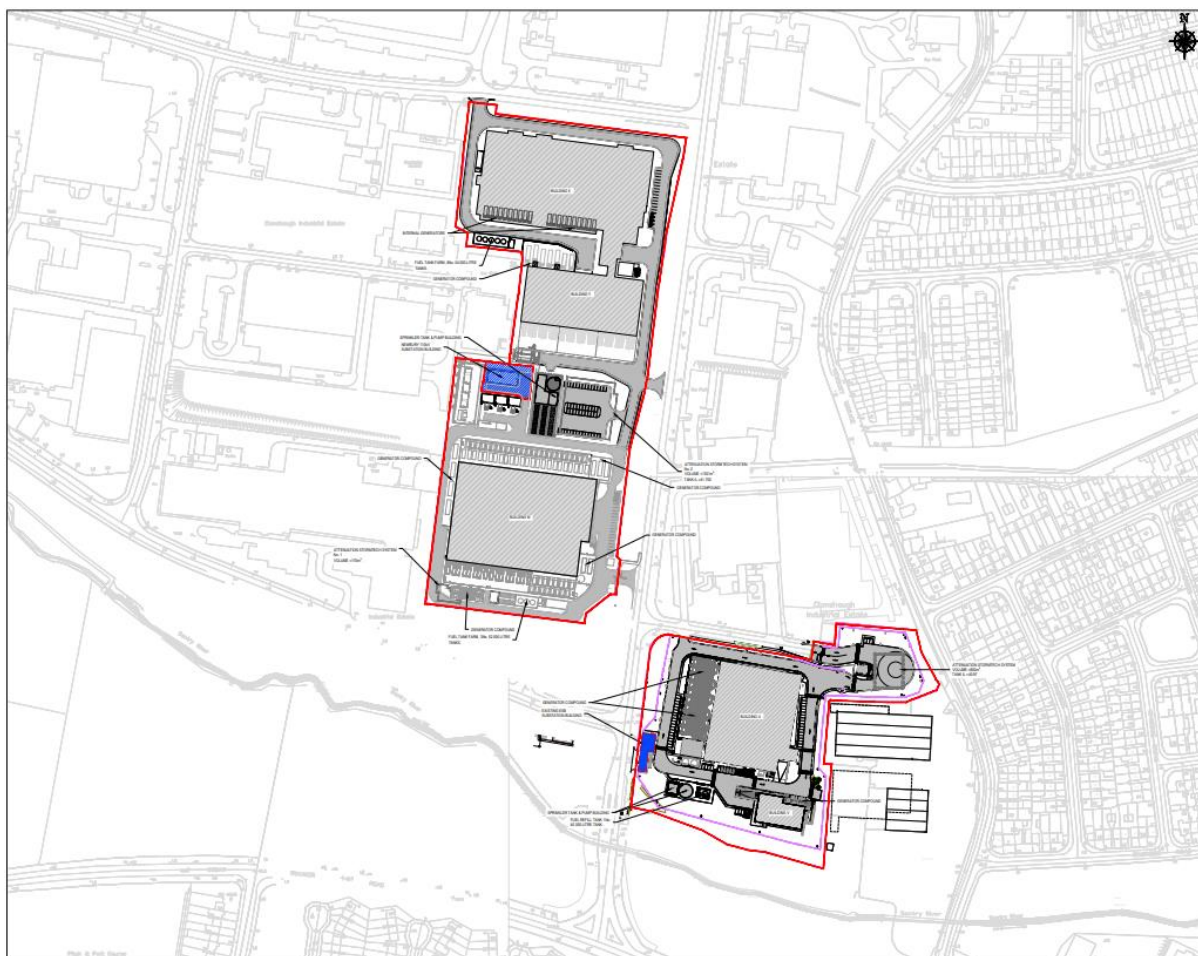


Figure 1.2 Site Layout (existing with extended Installation refer to Drawing 21_123F-CSE-00-XX-DR-C-0002 - Site Layout Plan (Rev C04))

2.0 SITE CONTEXT

The Installation is located on a site within IDA managed Clonshaugh Business and Technology Park (“the IDA Park”), approximately 50 m from Oscar Traynor Road. The IDA Park lies approximately 6.5 km north of Dublin’s city centre and 3 km south of Dublin Airport. Access to and from the IDA Park is from Oscar Traynor Road. This license review increases the Installation area from c. 7.9 hectares to c. 9.963 ha.

The IDA Park accommodates a range of technology and industrial type uses. developments within this business park are similar ‘individual lot’ type developments. The IDA Park is bounded by the M50/M1 to the west, the Santry River to the south with Oscar Traynor Road beyond, residential areas to east and the R139 to the north.

To the south of the Business Park is a sports grounds facility (Coolock Lane Park) and to the east are residential estates along Clonshaugh Road. The M1 motorway runs parallel to the IDA Park site boundary to the west of the Site and the Santry River is located to the south of the IDA Park, with the Oscar Traynor Road beyond. The R139 is to the north of the IDA Park. With the extended Installation, the closest occupied residential properties are c. <50 m east of the site boundary along the Clonshaugh Road, in comparison to the existing licenced Installation, where the closest are c. 200 m from the site boundary.

The wider context of the Site is defined primarily by commercial and industrial development. Large areas of the surrounding lands to the south and north within the IDA Park have been developed in the past 10-15 years and are occupied by industrial campuses including commercial and retail uses, including manufacturing, data centres and food manufacturing uses.

The surrounding 3 km of the site includes IE and IPC Licensed 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;
- Wood-Printcraft Limited (P0143-01), located to the southeast in Coolock Industrial Estate;
- Mondelez Ireland Production Limited (P0809-01), located to the southeast in Coolock Industrial Estate;
- Crown Paints Ireland Ltd (P0248-01), located to the southeast in Coolock Industrial Estate; and
- Barclay Chemicals Manufacturing Ltd (P0317-01), located to the southwest in Lilmar Industrial Estate.

The site location and wider context is presented in 21_123F-CSE-00-XX-DR-C-0001 Site Location Plan included with this application. The wider context of the Installation is largely unchanged from the original IE Licence application.

3.0 PLANNING STATUS

Existing Installation

The existing Installation received Final Grant of planning permission from Dublin County Council (DCC) under the separate applications listed below:

- Building W; final grant of permission on 2 April 2012 (DCC Reg. Ref.: 3534/11).
- Building X and Y; final grant of permission on 19 August 2013 (DCC Reg. Ref.: 2688/13), and final grant of permission on 24 October 2013 DCC Reg. Ref.: 2979/13).

Extended Installation

For the extended Installation, Final Grant of planning permission was obtained from DCC under the following applications:

- Buildings U and V: DCC Reg. Ref.: 3641/21, final grant of permission on 24 August 2022
- DCC Reg. Ref.: 3200/20, final grant of permission on 18 November 2020 (Grant retention)
- DCC Reg. Ref.: 2229/19, final grant of permission on 05 July 2019

All planning permissions for the data storage facilities that are relevant to this Licence review application under Class 2.1 of the EPA Act 1992 (as amended) have been granted on site (refer to Section 6 of this licence review application). Any further

information relating to the environmental assessment of the activity is made available and contained within Section 7 of this licence review application.

Project Threshold and Planning

Ireland's list of Projects for which an EIA is required are set out in Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001-2018. This list was developed from Annex I and Annex II of the EIA Directive. The activity is not directly listed under Annex I of the EIA Directive, or Part 1, Schedule 5, or Part 2, Schedule 5.

It is considered that the most relevant development class in the context of the proposed Project under Part 2, Schedule 5 is Class 10(a):

10. Infrastructure projects

- (a) *Industrial estate development projects, where the area would exceed 15 hectares.*

The overall development is within an Industrial Estate and as the total site area is c. 9.963 hectares, it does not exceed the limit, quantity or threshold set out in Part 2, Schedule 5, Class 10(a), therefore an EIAR is not required for this IE licence review application.

Additional Planning Permissions Outside of Main Activity:

In addition to the relevant planning permissions for the Data Storage buildings and combustion of fuels (that relate to the IE review application being made) the following additional permissions below relate to the history of the overall site.

Table 3.1 Planning Permissions

Application Details	Description of Development
Applicant: Amazon Data Services Ireland Ltd Reg. Ref.: 3400/19 Final Grant Date: 07 Oct 2019	Planning permission for development on a site of c. 0.025 hectares at Clonshaugh Business and Technology Park, Dublin 17. The site is located to the south of an existing data storage facility at the former Cahill Printers building (Building X). The proposed development comprises of a container compound for the purposes of providing ancillary modular plant, electronic equipment and machinery space. The development comprises 4 no. prefabricated metal containers (stacked to form 2 no. storeys), associated access arrangements and staircases, a boundary fence enclosure around the proposed development with 3no. access points, and all ancillary works.
Applicant: Amazon Data Services Ireland Limited Reg. Ref.: 2244/17 Final Grant Date: 22 May 2017	The development will consist of the upgrade of existing boundary railings and palisade fence by increasing the height of the existing fencing and railings by 0.7 meters to the overall site boundary
Applicant: ADSIL Reg. Ref.: 2273/12 Final Grant Date: 21 Aug 2012	Permission to construct a new GIS (Gas Insulated Switchgear) 110kv electricity substation and to carry out ancillary site works. The proposed works will consist of the following: 1. All necessary site works for construction of a concrete compound area to the north of the existing ADSIL facility. 2. Construction of an ESB GIS substation control building within the compound area. 3. Construction of a client control building and a transformer bay to contain three number transformers within the compound area. 4. Construction of a 6m wide concrete access road within the perimeter of the site area.

	5. Installation of all substation apparatus within the compound area and buildings.
Applicant: ADSIL Reg. Ref.: 3676/11 Final Grant Date: 23 Mar 2012	Upgrade of existing boundary fencing/railings, upgrade of existing site entrance, new security hut and upgrading of the site security system to include red-wall system, CCTV, public lighting poles and associated underground services to the site.
Applicant: Bellpark Developments Ltd Reg. Ref.: 3679/08 Final Grant Date: 09 Sep 2008	Development on a site of c0.325 hectares within Unit AF1, Clonshaugh Industrial Estate, Dublin 17. The application site will be located to the east of permitted Block no. 3 (per reg ref 1883/07) and will be located generally by the internal road network permitted under reg ref 1883/07. The development will consist of: A) 2 no. blocks as follows: - i) Block 1 (3 storey overall height 9.8m; GFA 2,343sqm) to comprise of 24no. own door office units (ranging in size from 72.0sqm to 138.5sqm). ii) Block 2 (single storey; overall height 8.1m; total GFA 1,146.1sqm) to comprise of 5 no. light industrial / workshop / enterprise units (ranging in size from 194.3sqm to 281.6sqm). The total GFA of the proposed blocks is 3,489.1sqm. B) 4 no. block indicator signs (each being 3m high with advertising space of c.2.8sqm each). C) All associated car parking, cycle parking, landscaping and site development works. D) Vehicular access and the internal road network to serve the proposed development will be per that permitted under reg ref 1883/07.
Applicant: Bellpark Developments Ltd Reg. Ref.: 5594/07 Final Grant Date: 08 Jan 2008	Permission for development of light industrial/warehouse/enterprise units, area 6,857.6sqm, consisting of: Block 1 (area 3,363.6sqm) containing 14 no. units for use as light industrial/warehouse/enterprise units ranging from 132.5 to 323.6sqm on ground and part first floors; Block 2 (area 1,771.3sqm) containing 7 no. units for use as light industrial/ warehouse/ enterprise units ranging from 142.7 to 355.1sqm, on ground and part first floors; Block 3 (area 1,697.4sqm) containing 10 no. units for use as light industrial/ warehouse/ enterprise units ranging from 142.7 to 210.3sqm, on ground and first floors: ESB substation and switchroom (area 25.3sqm); new vehicular access; car parking & associated site works.
Applicant: Unknown Reg. Ref.: 2524/96 Final Grant Date: May 1997	Retain and complete, compressor building at the rear of premises
Applicant: Acco Ireland Limited Reg. Ref.: 1248/96 Grant Date: 11 Sept 1996	Elevation modifications, provision of internal factory toilets, lunch rooms, offices, external signs, palisade fencing to yard, lighting standards and extra parking.
Applicant: Acco Ireland Limited Reg. Ref.: 2230/96 Grant Date: 8 Jan 1997	Twenty car park spaces, landscaping and pedestrian access on the east side of the building
Applicant: Donnelley Documentation Services Reg. Ref.: 2382/92 Grant Date: Feb 1993	Application for Planning Permission for a 'Two-Bay' Extension, New Entrance and Associated Site Works to the Donnelley Documentation Services Building at Clonshaugh Industrial Estate, Dublin 17.
Applicant: Mountcoal Investments Limited Reg. Ref.: 2512/90 Grant Date: 1 March 1991	Construction of additional 2-storey offices, ESB substation and ancillary buildings to previously approved industrial unit and offices.
Applicant: Mountcoal Property Investments Limited Reg. Ref.: 1172/90 Grant Date: 24Sept1990	Erect extension to existing general industrial unit.

Applicant: Acco Ireland Limited Reg. Ref.: 1036/90 Grant Date: 24 Sept 1990	Extension to Existing Factory
Applicant: Irish Printers Limited Reg. Ref.: 736/90 Grant Date: June 1990	Modification to existing Entrances and Boundary Fence, Build new entrance and Car Park.
Applicant: Mountcoal Investments Limited Reg. Ref.: 2772/89 Grant Date: 20 April 1990	Erection of an Industrial Unit and Offices.
Applicant: Mountcoal Investments Limited Reg. Ref.: 2772/89 Grant Date: Feb 1990	Erection of an Industrial Unit and Offices
Applicant: Mountcoal Investments Limited Reg. Ref.: 1477/89 Grant Date: 11 Oct 1989	Change of use of Light Industrial Unit including Offices to General Industrial Unit and erection of ESB Substation
Applicant: Chisima (Ireland) limited Reg. Ref.: 2146/89 Grant Date: 23 Sept 1989	Erection of Company Sign
Applicant: Unknown Reg. Ref.: 2321/88 Grant Date: Unknown	Original Planning Application cannot be found by DCC
Applicant: Acco Ireland Limited Reg. Ref.: 2219/852 Grant Date: 26 March 1985	Plant Room Extension to Factory
Applicant N1 Property Developments Limited Reg. Ref.: 5950/07 Grant Date: 15 May 2009	Ten year planning permission for development to create a new Northside Town Centre comprising a mixed use retail, office, residential, restaurant, bar, creche, community and recreational development over two phases on a 30.28 hectare site.

4.0 DESCRIPTION OF ACTIVITY

4.1 SITE OVERVIEW

4.1.1.1 Existing Installation (Building W, Y and X)

The existing Installation (Licensed under P1186-01) consists of 3 no. two storey data centre buildings (Buildings W, Building X and Building Y) with 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 at roof level. Building X and Y are connected via link corridor and share loading bay and offices.

The three data storage facilities generally consist of the following primary aspects:

- Data Storage Rooms housing IT electrical equipment;
- Internal and External Air Handling Unit (AHU) Plant Rooms to house the equipment required to maintain the temperature, humidity, and power supply for the installation;
- Administration areas (office space, meeting rooms, welfare facilities etc.);
- Emergency back-up generators, including day tanks (and associated emissions stacks/flues);
- Evaporative cooling water storage tanks; and;
- Loading bays and associated infrastructure.

Building W consists of a 2-storey building comprising electrical rooms for electronic operations, loading bay, stores, office, and staff facilities. The gross floor area of the building including ancillary elements is c. 9,469 sq.m. The building includes mechanical plant at roof level of the main building with associated visual screening. The external generator yard comprises 13 no. emergency back-up generators, with associated fuel day tanks. Fuel is provided to the day tanks from the Tank Farm to the south of the site.

Building X and Y consists of a 2-storey building connected via link corridor and comprises electrical rooms for electronic operations, electrical and mechanical plant rooms and support areas including offices and welfare facilities and a loading bay. The gross floor area of the development including ancillary elements is c. 21,750sq.m.. The building includes ground level external air handling units with associated visual screening. Building X includes an internal generator yard containing 20 no. emergency back-up generators, with associated fuel day tanks. Building Y includes an external generator yard containing 7 no. containerised emergency back-up generators, with associated fuel day tanks. Fuel is provided to the day tanks associated with Building X and Y from the Tank Farm to the south of Building X.

In addition to the 3 no. data storage facilities, the existing Installation also includes:

- An electrical Gas Insulated Switchgear (GIS) 110 kV Substation (owned and operated by ESB);
- 1 no. transformer compound located at the GIS Substation with associated control room (owned and operated by ADSIL);
- 1 no. fuel tank farm comprising 3 no. 52,000 L tanks within a concrete bund located in the east of the site associated with Building W;
- 1 no. fuel tank farm with 5 no. 54,000 L tanks within a concrete bund located in the north east of the site associated with Building X and Building Y;
- 1 no. 250 m³ fire sprinkler tank, and associated pump house including 2 no. fire sprinkler pumps for Building W;
- 1 no. 405 m³ fire sprinkler tank and associated pump house including 2 no. fire sprinkler pumps for Building X and Building Y;
- Internal site road network, and car parking;
- Underground foul and storm water drainage network,
- Underground water supply network

4.1.1.2 Extended Installation (Buildings U and V)

The extended Installation (subject to this license review) consists of 2 no. 2-storey data storage Installation buildings with mezzanine floors at each level (Buildings U and V) and ancillary elements. The ancillary elements of the development include; loading bays, maintenance and storage spaces, office administration areas, electrical and mechanical plant rooms, with plant at roof level, sprinkler tank and pump house,

security and utility spaces, underground foul and storm water drainage network, attenuation storm cells, internal road network with car and cycle parking, and site landscaping. Building U will have solar panels at roof level.

The two additional data storage buildings and ancillary development of the extended Installation will become part of the licenced Installation under this license review.

Similar to Buildings W, X and Y, Buildings U and V consist of the following primary aspects:

- Data Storage Rooms housing IT electrical equipment;
- Internal and External Air Handling Unit (AHU) Plant Rooms to house the equipment required to maintain the temperature, humidity, and power supply for the installation;
- Administration areas (office space, meeting rooms, storage areas, welfare facilities etc.);
- Emergency back-up generators (and associated emissions stacks/flues);
- Evaporative cooling water storage tanks; and;
- Loading bays and associated infrastructure.

Building U consists of a 2-storey building with two mezzanine levels, comprising electrical and mechanical plant rooms, a loading bay, maintenance and storage space, office administration areas, with plant at roof level. The gross floor area is c. 12,875 sq.m. The external generator yard comprises 11 no. containerised emergency back-up generators, with associated belly tanks. Fuel is provided to the belly tanks from the Top Up tank.

Building V consists of a 2-storey building comprising electrical and mechanical plant rooms, a loading bay, maintenance and storage space, office administration areas, with plant at roof level. The gross floor area of the building including ancillary elements is c. 1,455 sq.m. The external generator yard comprises 1 no. containerised emergency back-up generator, with associated belly tank and a fuel day tank. Fuel is provided to the day tank from the Top Up tank.

In addition to the 2 no. data storage facilities, the extended Installation also includes:

- 1 no. 40,000 L tank within a concrete bund located in the southern part of the site;
- 1 no. 256 m³ fire sprinkler tank, compound, and associated pump house including 2 no. fire sprinkler pumps;
- On site Substation (owned and under the control of ESB)
- Security building;
- Internal site road network, landscaping, and car parking;
- Underground foul and storm water drainage network; and
- Underground water supply network.

4.2 PRIMARY PROCESSES/ACTIVITIES

4.2.1 Emergency Back-up Generators

The Installation is supported by containerised emergency back-up generators that are located externally in a generator yard associated with the data storage buildings. These generators provide the necessary power to ensure the data centre buildings continue to operate in the event of a temporary failure of electricity supply. An

uninterruptible power source or UPS system is also provided for the short-term transition from mains power to the emergency back-up generators.

The Installation requires a continuous supply of electricity to operate. During normal operations, the facility is supplied electricity from the national grid. Outside of normal operations, the facility is first supplied electricity by some or all of the onsite battery Installations and then by some or all of the onsite backup generators. Outside of routine testing and maintenance, the operation of these back-up generators is typically only required under the following emergency circumstances:

- A loss, reduction, or instability of grid power supply,
- Critical maintenance to power systems,
- A request from the utility supplier (or third party acting on its behalf) to reduce grid electricity load.

The emergency back-up generator operating hours are recorded on the Enterprise Asset Management System (EAM). For each emergency generator, the Operation's Team manually enters planned and emergency run hours and the description of the operation (run reason) onto the EAM system.

The environmental team must approve all emergency generator operation associated with on-load planned maintenance/testing to ensure the run hours do not exceed what is allowed under the site's Licence conditions. This is done automatically on ADSIL's internal maintenance approval system platform. The Operation teams must attach an excel spreadsheet to the approval request which shows all of the maintenance/testing events and associated run hours for the year to date. This 'Run Hour Spreadsheet' is maintained by the Operations Team.

When an emergency operation is logged, an email alert is sent to the Environmental Team for review and tracking. The Operations team also maintain an excel spreadsheet on which they record every emergency operation of a generator. The environmental team review this information after every emergency event.

4.2.1.1 Existing Installation (Building W, Y and X)

Building W, Building Y and Building X are accompanied by a designated generator compound. There is no interconnectivity between the generators of different buildings.

The individual generators are housed within compounds (Building W and Building Y) or within an internal generator yard (Building X), with various designed control measures in place including acoustic attenuation and exhaust silences. Fuel is stored locally in in day tanks in the generator building (for Building X) or within each containerised generator (Building W and Y).

The individual double skinned day tanks at the emergency back-up generators have level gauges (high and low) connected to an onboard controller which will alarm to prevent overfilling and identify a sudden loss of fuel within the tank.

The containerised emergency back-up generator housing includes retention bunding in the base of the container, there are leak detection systems within the bund. Should hydrocarbon be detected in the base of the container the system sends an alarm signal to the Building Management System (BMS) to alert Engineering Operations Technicians (EOTs). The onboard controller for individual generators is connected to the BMS.

4.2.1.2 Extended Installation (Buildings U and V)

Buildings U and V are each accompanied by an external generator compound. There is no interconnectivity between the generators of different buildings. The individual generators are housed within a container with various designed control measures in place including acoustic attenuation, exhaust silencers. For Building U, fuel is stored locally within individual belly tanks, whilst the generator for Building V has a belly tank and a day tank.

The individual double skinned day tank, and belly tanks at the emergency back-up generators have level gauges (high and low) within the fuel tanks connected to an onboard controller which will alarm to prevent overfilling and identify a sudden loss of fuel within the tank.

The emergency back-up generators (excluding the 1 no. 2.19 MW_{th}) for Buildings U (10 no. 6.49 MW_{th}) and V (1 no. 3.6 MW_{th}) are each fitted with a Selective Catalytic Reduction (SCR) unit to reduce exhaust emission gases to air. The SCR system injects a reductant, an aqueous solution of urea, into the exhaust stream of the engine. The mixed exhaust gases and urea solution pass through a specialised catalytic converter, known as the SCR catalyst. Inside the SCR catalyst the high-temperature exhaust gases react with the urea significantly reducing NO_x and producing nitrogen gas (N₂) and water vapor (H₂O).

The aqueous solution of urea is unloaded into a distribution manifold, which serves to fill the 11 no. urea day tanks (10 no. for Building U and 1 no. for Building V) located within each individual generator container.

4.2.2 Data Storage Building(s).

Data storage facilities are centralised computer server systems on a large scale. At typical data storage facility scale (typically involving systemised racks of hundreds/thousands of server units), they offer significant advantages (and economies of scale) over traditional in-house data storage systems. The primary advantages are:

- Higher reliability and redundancy of systems,
- 24/7 monitoring and maintenance of storage by staff,
- Higher security and data protection, and
- Flexibility – ability to increase or decrease storage requirements at short notice in line with specific business needs.

The demand for cloud computing and data storage continues to be high and the Installation is intended to help meet this need.

The additional data storage buildings (U and V) for the extended Installation are similar in nature to the existing Installation data storage buildings (W, X and Y).

4.3 SECONDARY PROCESS/ACTIVITIES

4.3.1 Ancillary infrastructure

For both the existing and extended Installation, there are integrated administration areas associated with each main data hall building. The administration areas comprise the following main components:

- Reception areas;
- Open office areas,
- Conference rooms/meeting rooms;
- Maintenance and storage spaces; and
- Break room or canteen; and
- Sanitary facilities.

Additional Ancillary infrastructure includes:

- Underground foul and storm water drainage network;
- Utility ducts and cables;
- Internal road network - car and motorcycle parking spaces and sheltered bicycle parking spaces;
- Security hut and security fencing; and
- Drainage infrastructure including 2 no. underground attenuation systems.

4.3.2 Data Hall Cooling Systems

4.3.2.1 Existing Installation (Building W, Y and X) and extended Installation (Building U and V)

The location of the facilities in Ireland allows for the use of free-cooling media without the need for mechanical cooling. To take advantage of this, the AHUs are fitted with airside condensers to utilise this outdoor air to cool the space.

The cooling units or AHUs provide conditioned air to maintain temperature, relative humidity and pressurisation in the data halls. The cooling units operates under 2 modes; 'Free Cooling' and 'Evaporative Cooling'. Free cooling mode uses outside air and evaporative cooling mode or 'Adiabatic Cooling' uses water from the mains supply as the cooling media. Duty and standby units are in place to ensure cooling is available at all times.

In the free cooling system, fresh air from outside the buildings enters the data halls via external louvres. The air is warmed as it passes across the IT servers located in the data halls, and subject to temperature conditions, this air is either recirculated or exhausted to atmosphere by the exhaust fans located at roof level. There is no emission of air pollutants from this process; and therefore, the exhaust is not considered an 'emission point'.

Free cooling is sufficient to cool the data halls for the majority of the year. During elevated external temperatures particularly during summer months, evaporative cooling (also known as adiabatic cooling) is required.

Evaporative cooling utilises mains water (at ambient temperature) from the mains supply as the cooling media. This water is stored within humidified water storage tanks located adjacent to each building.

The fresh air is passed over evaporative cooling pads that are dampened by the cooling water as it is drawn into the building, the external air is cooled through an air/water heat exchange before entering the data hall. The majority of the evaporative cooling water is evaporated in this process. The evaporative cooling system provides greater energy efficiency than other options such as the use of chillers/compressor systems.

Evaporative cooling water is distributed via a ring main to each AHU corridor. The evaporative cooling water quality is maintained by a UV water sterilizer. The AHU has a water 'sump' which is supplied from the cooling water tanks. These sumps are equipped with a mechanical float valve to maintain the water level at an operational level to ensure there is sufficient water for the pumping system. Water is then pumped up into the AHU. Water that is not evaporated at the end of the cooling cycle is discharged to storm water.

The evaporative cooling water for the Site is sourced from the mains water provided by Uisce Eireann, the water requires no chemical treatment. The AHUs are clean systems and therefore the evaporative cooling water is of sufficient quality to be discharged to stormwater, furthermore this water diluted in the Site's stormwater attenuation systems.

The recirculated evaporative cooling water in the humidified water storage tanks is drained down typically every 7 days to the storm water drainage network to prevent legionella growth in the system. The regular replenishment of the evaporative cooling water prevents legionella growth. A conductivity probe is in the AHU sump is used to determine the level of salts build up – there is no water treatment or water softeners added.

In the event that conductivity exceeds 1,500 $\mu\text{S}/\text{cm}$, water is bled off constantly when 1,500 $\mu\text{S}/\text{cm}$ is reached, the sump is not drained fully as that would impede the evaporative system. Water is bled off until conductivity drops below 1,500 $\mu\text{S}/\text{cm}$ and the drain valve is closed.

Cleaning of the water-based cooling systems including all AHUs and pipelines with hydrogen peroxide solution is only undertaken if positive legionella samples have been detected in the unit. In accordance with ADSIL legionella management procedure, every cooling system is sampled annually for legionella bacteria. If a result exceeds 1000CFU/L, the air handling unit is disinfected with a hydrogen peroxide solution. Based on past experience, disinfection is required on approximately 10% of systems annually. During the disinfection process, 50 ml of hydrogen peroxide solution is dosed into the air handling unit and water is recirculated through the cooling system. The disinfected water is discharged to the cooling system drain and ultimately to the storm network. Any residual hydrogen peroxide is oxidised by organics in the onsite storm drainage network and converted to water and oxygen prior to discharge via storm sewer.

The extended Installation Buildings U and V are designed to harvest up to 90% of the annual cooling water requirements through rainwater harvesting, offsetting the water used from the mains supply.

4.3.3 Office Space Air Conditioning

Office air conditioning is provided by a Variable Refrigerant Flow (VRF) system which allows varying degrees of cooling across the office and support spaces thereby reducing energy consumption. High efficiency units are used to minimise the electrical power demand.

The fresh air ventilation system for the office areas of the buildings is served using energy efficient Heat Recovery Units (HRU) which will recover waste heat from the office spaces and re-use to pre-heat the air with the HRU. This reduces the overall energy consumption for this system. The toilet areas are mechanically ventilated and

automatically controlled by occupancy sensors to set back the ventilation rate during periods of non-use.

4.3.4 Waste Heat Recovery

The cooling system design for the data centre buildings within the existing and extended Installation can accommodate the future installation of heat recovery coils in the central ventilation plant. If incorporated, the heat recovery coils would remove heat from the air after it passes through the data storage rooms to a hydraulic (water) pipe network before the air is re-introduced to the data storage room or exhausted to the atmosphere.

The heat recovery coils could generate hydraulic temperatures of between 20-30°C at the point of recovery.

The above provision could supply heat energy to a future district heating scheme developed by others external to the Site boundary. It should be noted that in order to benefit from the above heat recovery that district heating infrastructure external to The Site including plate heat exchangers, pumps and distribution networks would need to be developed by others.

A suitable receiver of waste heat from the Installation is not currently available.

4.3.5 Electricity Supply and Substation

4.3.5.1 Existing Installation (Building W, Y and X)

The power requirements for the installation are provided via a connection to an 110kV Gas Insulated Switchgear (GIS) Substation Compound located to the north of Building W, and to the south of Building Y, that was approved under DCC Planning Ref. 2273/12.

The 110kV Substation (known as Newbury) is a distribution HV substation. ESB Networks are the Distribution System Operator (DSO) and Distribution Asset Owner (DAO). ESB Networks is a subsidiary within ESB Group. ESB Networks finances, builds, operates, and maintains the distribution system through which electricity is distributed to end users. It does this under DSO and DAO licences granted by the Commission for Regulation of Utilities (CRU).

There is 1 no. transformer compound containing 3 no. transformers and associated control building owned and operated by ADSIL located to the south of the Newbury Substation.

4.3.5.2 Extended Installation (Buildings U and V)

The power requirements for the extended Installation are provided via 2 Medium Voltage (MV) cable connections to the ESB Substation located to the west. This includes the substation building (floor area c.34.5sq.m), permitted under DCC Planning Ref 2229/19, and extended DCC Planning Ref. 3641/21 (c. 115 sq.m additional GFA).

4.4 WATER, SEWER, AND STORMWATER DRAINAGE INFRASTRUCTURE

4.4.1 Potable Water Supply

The facility has a demand for general potable supply, for cleaning, drinking and sanitary facilities, cooling equipment, and for firefighting.

4.4.1.1 Existing Installation (Building W, Y and X)

The water supply to the existing Installation is sourced from mains water supply via a metred connection from the existing main to the south of the existing Installation, in accordance with DCC Planning Refs. 2979/13, 2688/13 and 3534/11. Water is used at the Installation for both staff welfare and cooling functions of the building's AHUs.

The existing Installation requires an average annual water supply of 17,886 m³. Where water demand is required during a short-term drought, additional supply can be provided from an alternative source such as tanker supply.

Pumps will supply water to the data storage facilities from the humidified water storage tanks.

On-site water storage is provided at each building in humidified water tanks on site that have a combined volume of 326 m³ to support the cooling functions of the building's AHUs. Pumps will supply water to the data storage buildings from the humidified water storage tanks. During route operations is no addition of water treatment chemicals, the water tanks are emptied once annually.

Fire water

A 250-300mm fire ring main is in place across the campus to provide firefighting water to the existing Installation in accordance with DCC Planning Ref. 2979/13, 2688/13 and 3534/11.

There is 1 no. 250 m³ fire sprinkler tank and pump house associated with Building W, which contains 2 no. fire sprinkler pumps. There is 1 no. 405 m³ fire sprinkler tank and pump house associated with Building X and Y, containing 2 no. fire sprinkler pumps.

There is no addition of water treatment chemicals applied, the water tanks are emptied once annually.

4.4.1.2 Extended Installation (Buildings U and V)

The water supply for Buildings U and V is sourced from mains water supply and from harvested rainwater. The mains supply is via a metred connection from the existing main in the IDA estate road to the north of the site, in accordance with DCC Planning Ref. 3641/21.

The buildings are designed to harvest rainwater when available, which would provide up to 90% of the annual cooling water requirements of Buildings U and V, offsetting the water taken from the local supply. Taking the harvested rainwater into account, the extended Installation requires an average mains annual water supply of 1,085 m³ (with a total mains annual water supply of c. 18,971 m³ for the overall Installation).

As with the existing Installation, on-site water storage is provided at each building to support the evaporative cooling function of the building's AHUs. Pumps will supply

water to the data storage facilities from the humidified water storage tanks. The humidified water tanks have a combined volume of 168 m³, the water tanks are filled with a combination of mains water and harvested rainwater. There is no addition of water treatment chemicals applied, the water tanks are emptied once annually.

Fire water

A 250mm fire ring main provides firefighting water to the extended Installation in accordance with DCC Planning Ref. 3461/21.

There is 1 no. 285 m³ fire sprinkler tank and pump house associated with the site, which contains 2 no. fire sprinkler pumps.

There is no addition of water treatment chemicals applied, the water tanks are emptied once annually.

4.4.2 Stormwater Drainage Systems

4.4.2.1 Existing Installation (Building W, Y and X)

Rainwater runoff from impermeable areas of the site is collected via the onsite storm water drainage network in accordance with DCC Planning Ref. 2979/13, 2688/13 and 3534/11. This network conveys the stormwater to one of 2 no. stormwater attenuation systems (See Drawing 21_123F-CSE-00-XX-DR-C-1100-Surface Water Layout Plan) before the attenuated stormwater discharges offsite at 2 no. emission points (SW1 and SW2).

There are 2 no. Attenuation Storm Cells located on site that are designed to attenuate storm waters:

- Attenuation Storm cell 1 (170 m³ capacity) is located to the south of the site. From there, the stormwater is discharged at emission point SW1, which connects to the existing 450 mm business park storm sewer located to the south of the existing Installation and subsequently to the Santry River.
- Attenuation Storm cell 2 (1,351 m³ capacity) is located to the south of Building Y. From there, the stormwater is discharged at emission point SW2 which connects to the existing 900 mm business park storm sewer located to the east of the existing Installation that flows north to south, and subsequently to the Santry River.

There is negligible retained water within the attenuation storm cell 1 and 2 under dry weather conditions. The allowable runoff rate for Building W is restricted to pre-development flows of 294.8 litres per second (l/s) or 1061.28 cubic meters per hour (m³/hour). The allowable greenfield runoff rate for Building X and Y is 7 l/s or 25.2 m³/hour.

Prior to discharge, the stormwater passes through hydrocarbon interceptors to ensure that the quality of the stormwater discharge is controlled. This network is shown on Drawing 21_123F-00-XX-DR-C-1100 Surface Water Layout Plan.

The business park storm sewer(s) outfall into the Santry River located to the south of the Site; the Santry River flows 5.15 km east, to the North Bull Island transitional water body, and ultimately the Dublin Bay.

Evaporative Cooling Water

Evaporative cooling water from the AHUs in Building W, Y and X discharges to the stormwater drainage network Emission Point (SW1, and SW2). This is recirculated mains water that has been through the AHUs only. There is no addition of water treatment chemicals and therefore the water is of sufficient quality to be discharged to the stormwater drainage network.

Flue drainage discharge

Rainfall which passes through the back-up generator exhaust stacks for Building Y and a small no. of generator exhaust stacks for Building W will discharge to the storm water drainage network via hydrocarbon interceptors. For Building X and the majority of Building W the back-up generator exhausts are horizontal which prevents rainwater entering the generator flue.

4.4.2.2 Extended Installation (Buildings U and V)

For the extended Installation, rainwater runoff from impermeable areas is collected via the onsite storm water drainage network in accordance with DCC Planning Ref. 3461/21. This network conveys the stormwater to an attenuation system via Hydrocarbon Interceptors to ensure that the quality of the stormwater discharge is controlled (See Drawing 21_123F-CSE-00-XX-DR-C-1100-Surface Water Layout Plan). The attenuated stormwater discharges offsite at emission point SW3.

There is 1 no. Attenuation Storm cell for the extended Installation that is designed to attenuate storm waters:

- Attenuation Storm cell 3 (800 m³ capacity) at the north east corner of the extended part of the site, close to Building U. From there, the stormwater is discharged at emission point SW3, which connects to the 900mm diameter storm sewer running north to south beneath the entrance road to the Business Park and subsequently to the Santry River.

There is negligible retained water within the Attenuation Storm cell 3 under dry weather conditions. The allowable runoff rate is 2.4 litres per second (l/s), or 8.64 m³/hr. This network is shown on Drawing 21_123F-00-XX-DR-C-1100 Surface Water Layout Plan.

As per the existing Installation, the Business Park storm sewer outfalls into the Santry River located to the south of the Site; the Santry River flows 5.15 km east, to the North Bull Island transitional water body, and ultimately into Dublin Bay.

Evaporative Cooling Water

Evaporative cooling water from the AHUs in Building U and V discharges to the stormwater drainage network at Emission Point SW3. This is recirculated mains water that has been through the AHUs only. There is no addition of water treatment chemicals and therefore the water is of sufficient quality to be discharged to the stormwater drainage network.

Flue drainage discharge

Rainfall which passes through the back-up generator exhaust stacks for Building U and Building V will discharge to the storm water drainage network and pass via hydrocarbon interceptors prior to entering the attenuation tank.

Fuel Top Up Tank Bund

Drainage of rainwater from the top up tank bund south of Building U is directed to the surface water drainage network.

The drainage sump located in the top up tank concrete bund contains hydrocarbon detectors which automatically shut off drainage from these sumps if fuel is detected in the sump, preventing any contaminated stormwater from exiting the bund. These probes are also connected to the BMS/EPMS critical alarm.

Drainage from the top up tank bund is directed through a forecourt hydrocarbon interceptor. The hydrocarbon interceptor is equipped with an oil warning system which is connected to the BMS/EPMS critical alarm.

4.4.3 Wastewater Drainage System

Domestic effluent arising from occupation of the existing and extended Installation is discharged to the public foul sewer (at emission points SE1 through SE5).

All internal foul drainage networks were designed in accordance with the relevant guidance including Irish Waters Code of Practice for Wastewater Infrastructure, National Building Regulations Technical Guidance Document H – Drainage & Waste Disposal.

The foul network ultimately conveys the wastewater for final treatment and disposal at Ringsend Wastewater Treatment Plant (WWTP) in Dublin.

4.4.3.1 Existing Installation (Building W, Building Y and Building X)

Domestic Effluent

For the existing Installation, a gravity piped foul drainage network comprising 225 mm uPVC pipes conveys effluent from internal sanitary locations and outfall into the external foul network. The outfall into the existing foul network is at four locations: SE1, SE2, SE3 and SE4. Refer to Drawing 21_123F-00-XX-DR-C-1200-Foul Water Layout Plan for the foul drainage layout.

The foul water connection to the public foul sewer is in accordance with the DCC Planning Ref. 2979/13, 2688/13 and 3534/11.

Fuel Tank Farm(s)

Drainage of rainwater from the fuel tank farm and associated fuel unloading bays to the south of the existing Installation (Building W) is directed to foul sewer and connects to the foul main at emission point SE2 and SE3. The drainage from the fuel tank farm and associated fuel unloading bays to the north of the existing Installation (Building X and Y) is directed to foul sewer and connects to the foul main at emission point SE1.

The drainage sumps at the fuel unloading bays and in the bulk tank concrete bunds contain hydrocarbon detectors which automatically shut off drainage from these sumps if fuel is detected, preventing any contaminated stormwater from exiting the bund. These probes are also connected to the BMS/EPMS critical alarm.

Drainage from the bulk tank farms is equipped with hydrocarbon interceptor(s). The locations of these are illustrated on 21_123F-00-XX-DR-C-1200-Foul Water Layout Plan. The hydrocarbon interceptors are equipped with an oil warning system which is connected to the BMS/EPMS critical alarm.

Transformer Compound

There is one transformer compound onsite, located at the Newbury GIS Substation. The drainage from the transformer compound is directed to foul sewer and connects to the foul main to discharge at emission point SE1.

Drainage from the GIS Substation transformer compound is equipped with hydrocarbon interceptors. The locations of these are illustrated on Drawing 21_123F-00-XX-DR-C-1200-Foul Water Layout Plan. The hydrocarbon interceptors are equipped with an oil warning system which is connected to the BMS/EPMS critical alarm.

4.4.3.2 Extended Installation (Buildings U and V)

Domestic Effluent

Domestic effluent arising from the extended Installation, i.e. Buildings U and V is discharged to the public foul sewer (at emission point SE5. Refer to Drawing 21_123F-00-XX-DR-C-1200-Foul Water Layout Plan for the foul drainage layout. The foul water connection to the public foul sewer is in accordance with the DCC Planning Ref. 3461/21.

A gravity piped foul drainage network, comprising 100 mm diameter pipes connecting to 150 mm diameter pipes, conveys effluent from internal sanitary locations and outfall into the external foul network.

5.0 BEST AVAILABLE TECHNIQUES AND COMMISSION IMPLEMENTING DECISION

Section 86A(3) of the EPA Act 1992 as amended, requires that the Agency shall apply BAT conclusions as a reference for attaching one or more conditions to an IE Licence. The Installation, including the extended Installation, has principally been assessed against the BAT conclusions contained in Table 6.1:

Table 5.1 Applicable BAT documents

Horizontal BREF	Publication date	Attachment
Best Available Techniques (BAT) Reference Document for Large Combustion Plants	2021	Attachment-4-7-1-BREF - Large Combustion Plants
Reference Document on the Best Available Techniques for Energy Efficiency	2009	Attachment-4-7-2-BREF - Energy Efficiency
Reference Document on the Best Available Techniques on Emissions from Storage	2006	Attachment-4-7-3 BAT REF - Emissions from Storage
Reference Document on the application of Best Available Techniques to Industrial Cooling Systems	2001	Attachment-4-7-4 BAT REF - Industrial Cooling Systems

The assessment has demonstrated that the Installation will comply with all applicable BAT Conclusion requirements specified in the CID and will be in line with the guidance specified in the other relevant BREF Documents and relevant national BAT notes.

6.0 MANAGEMENT OF RAW MATERIALS, INTERMEDIARIES AND WASTES

A list of all raw materials in use on the Site is provided in Attachment-4-6-2.

Spill kits are located across the Site in highly visible and mobile units. These include absorbent socks, mats, pads, disposable bags, and PPE. Spill kits are utilised in the event of a spill and staff are trained in the use of spill management materials. Staff are fully trained in site procedures, including all Standard Operating Procedures (SOPs) and emergency response and safety procedures in relation to the storage and handling of all substances being used at the Installation.

6.1 RAW MATERIALS MANAGEMENT

For both the existing and extended Installation, the only chemical stored on site in bulk is fuel (diesel or HVO/diesel blend). Either diesel or HVO may be used for emergency back-up generators, with a preference to use only HVO when supply is available. Small volumes of maintenance chemicals including coolant and descaler are held on site. There are no other raw materials held onsite other than domestic cleaning chemicals for cleaning of the staff facilities. These are managed by the cleaning company. All oils, paints, adhesives, or other materials required are brought onsite and removed from site by the relevant contractors.

Refrigerant is held within the VRF system for the offices. No additional refrigerants are stored onsite. R410A, R32, R134a and R407c refrigerants are held within this enclosed system on a continuous basis and would only be removed during decommissioning.

The small amounts of hazardous waste generated are stored internally in appropriate waste receptacles on bunds, or externally to each building in appropriate waste receptacles in covered bunds.

Hazardous waste is covered, and mobile retention bunds are in place to contain any liquid waste that requires storage. The waste is collected from the designated areas by an authorised waste management contractor for disposal off-site.

Waste oil and filters and waste batteries are not stored onsite and are removed by the maintenance companies during maintenance operations and change outs.

6.1.1 Fuel Oil

Fuel for the emergency back-up generators is stored in multiple locations across the Site; that includes bulk fuel tanks and day tanks located with each emergency back-up generator.

All fuel tanks, banded storage and pipelines have been designed for the specific purpose and contents. As required, the structures will be rendered impervious to the materials stored therein. All fuel tanks, banded storage and pipelines are integrity tested following installation by vendor. Fuel pipelines above ground are Carbon Steel, and below ground are Close Fit PLX (dual-contained pipe system).

There is a total fuel storage capacity on site of 748,250 litres or 748.25 m³. If storing only diesel, this would be approximately 643.50 tonnes of diesel (assumed density of 0.86 kg/l). If using HVO, this would be approximately 582.14 tonnes (assumed density of 0.846 kg/l). The tanks on site are filled to up to approximately 90% capacity under normal conditions; therefore, the expected fuel storage on site is 673,425 litres, 673.425 m³, which is approximately 579.15 tonnes of diesel, or 523.92 tonnes HVO. A combination of both may be used.

In accordance with the Commission for Energy Regulation (CER) regulations, low sulphur diesel is used. In addition, Hydrotreated Vegetable Oil (HVO) is now used on all sites (with a preference to use only HVO when supply is available) to power backup emergency back-up generators. ADSIL are committed to operating all of their data centres on the basis of net zero greenhouse gas (GHG) emissions. HVO has the advantage of GHG emission reductions of greater than 75%¹ compared to fossil-fuel derived diesel and thus will contribute to achieving net zero GHG emissions by 2050 in line with Irish and EU targets.

6.1.1.1 Existing Installation (Building W, Y and X)

The Existing Installation (Building W, Y and X) includes the following fuel storage tanks:

- Bulk Fuel Oil Storage
 - 3 no. fuel storage tanks (Building W), each 52,000 litres
 - 5 no. fuel storage tanks (Building X ,Y), each 54,000 litre
- Emergency Backup Generator Fuel
 - 13 no. day tanks (Building W), each 2,500 litres
 - 20 no. day tanks (Building X), each 2,500 litres
 - 7 no. day tanks (Building Y), each 2,500 litres
- Fire Sprinkler Pump Fuel
 - 3 no. fuel tanks (located between Building W and Y), each 1,000 litres
 - 3 no. fuel tanks (located at Building W), each 1,000 litres

Bulk Fuel Tank Farms

Bulk fuel is supplied to Building W generators from the 3 no. 52,000 L tanks located in the southeast of the existing Installation; the bund has a capacity of 316.80 m³.

Bulk fuel is supplied to Building X and Y generators from the 5 no. 54,000 L tanks located in the northeast of the existing Installation; the bund has a capacity of 408 m³. Bund capacity for each tank farm exceeds the EPA guidance for 110% of the capacity of the largest tank or drum within the bunded area, or 25% of the total volume of the substance which could be stored within the bunded area.

The bunds are constructed of suitable concrete and have undergone testing for integrity during the commissioning phase. All pipelines are integrity tested following installation by vendor. The bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects fuel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.

The bulk fuel tanks are fitted with automated level gauges and the online readings from these gauges are fed back into the facility's BMS/EPMS. The bulk tanks also have high/low level alarms (90% high, 30% low) and a high-level switch at 95% which alarm to the BMS/EPMS critical alarm.

Fuel delivery to the bulk storage tanks takes place within the designated fuel unloading areas under strict Standard Operating Procedures. Fuel is then be piped from the bulk storage tanks to the emergency back-up generator. Fuel pipelines above ground are Carbon Steel, and below ground are Close Fit PLX (dual-contained pipe system).

Buildings W

Bulk fuel is supplied to the emergency back-up generator day tanks at Building W from the Bulk Tank Farm in the southeast of the site.

Each of the 13 no. emergency back-up generators are accompanied by a double skinned day tank (2,500 litres each) for immediate supply to the generator. These day tanks are equipped with level gauges with high/low alerts which will also alarm to BMS/EPMS critical alarm.

There are 2-no. fire sprinkler pumps at the sprinkler house that have 3 no. double skinned tanks (1,000 litres each) for immediate supply to the fire sprinkler pump(s).

Buildings X and Y

Bulk fuel is supplied to the emergency back-up generators day tanks at Building X and Y from the Bulk Tank Farm in the northeast of the site.

Each of the 20 no. emergency back-up generators at Buildings X, and 7 no. emergency back-up generators at Buildings Y, are accompanied by a double skinned day tank (2,500 litres each) for immediate supply to the generator. These day tanks are equipped with level gauges with high/low alerts which will also alarm to BMS/EPMS critical alarm.

There are 2-no. fire sprinkler pumps at the sprinkler house that have 3 no. double skinned tanks (1,000 litres each) for immediate supply to the fire sprinkler pump(s).

6.1.1.2 Extended Installation (Buildings U and V)

The Extended Installation (Buildings U and V) includes the following fuel storage tanks:

- Top Up Fuel Oil Storage
 - 1 no. fuel storage tank (Buildings U, V), 40,000 litres
- Emergency Back-up Generator Fuel
 - 10 no. belly tanks (Building U), each 16,000 litres
 - 1 no. belly tank (Building U), 4,950 litres
 - 1 no. belly tank (Building V), 8,500 litres
 - 1 no. day tank (Building V), 1,000 litres
- Fire Sprinkler Pump Fuel
 - 2 no. fuel tanks, (Buildings U, V) each 460 litres
 - 1 no. fuel tank, (Buildings U, V) 900 litres

Top Up Fuel Tank Farm

Fuel is supplied to Buildings U and V generators from the 1 no. 40,000 L tank located in the south of the extended Installation; the bund has a capacity of 63 m³. The bund capacity exceeds the EPA guidance for 110% of the capacity of the largest tank or drum within the banded area, or 25% of the total volume of the substance which could be stored within the banded area.

The bund is constructed of suitable concrete and has undergone testing for integrity during the commissioning phase. All pipelines are integrity tested following installation by vendor. The bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects fuel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.

The top up tank is fitted with automated level gauges and the online readings from these gauges are fed back into the facility's BMS/EPMS. The top up tank also has high/low level alarms (90% high, 30% low) and a high-level switch at 95% which alarm to the BMS/EPMS critical alarm.

Fuel delivery follows the same strict SOPs as the existing Installation. Fuel is piped from the top up tank to the emergency back-up generators. Fuel pipelines above ground are Carbon Steel, and below ground are Close Fit PLX (dual-contained pipe system).

There are 2-no. fire sprinkler pumps at the sprinkler house that have 3 no. double skinned tanks (2 x 460 litres and 1 x 900 litres) for immediate supply to the fire sprinkler pump.

Building U

Fuel is supplied to the emergency back-up generator belly tanks at Building U from the top up tank to the south of the building.

Each of the 11 no. emergency back-up generators at Buildings U have their own fuel belly tank with local control panel for immediate supply to the generator, with motorized valve for fuel fill and leak detection prevention, and safety alarms to the BMS/EPMS. 10. no belly tanks have a fuel storage capacity of 16,000 litres, 1 no. belly tank has a capacity of 4,950 litres.

Buildings V

Fuel is supplied to the emergency back-up generator's belly tank and day tank at Building V from the top up tank in the south of the site.

The 1 no. emergency back-up generator at Buildings V has a belly tank (8,500 litres) and is accompanied by a double skinned day tank (1,000 litres) for immediate supply to the generator. This day tank is equipped with level gauges with high/low alerts which will also alarm to BMS/EPMS critical alarm.

6.1.2 Urea (aqueous solution)

For the extended Installation, the individual emergency back-up generators (excluding the 1 no. 2.19 MW_{th} backup generator) for Buildings U (10 no. 6.49 MW_{th} generators) and V (1 no. 3.6 MW_{th} generator) uses an aqueous solution of urea for SCR abatement system, stored in single-skinned storage tanks.

The extended Installation includes the following urea storage tanks:

- Building U - 10 no. urea tanks (each 850 litres useable capacity, 895 litres total capacity); and
- Building V – 1 no. urea tank (1,275 useable capacity, 1410 litres total capacity).

The filling process is managed via the unloading yard and distribution manifold, which serves to fill the 11 no. urea day tanks (10 no. for Building U and 1 no. for Building V) located within each individual generator container.

For safety and efficiency, the urea tanks are equipped with overflow and leak protection devices and alarms and controlled based on low and high level sensors. The level gauge sensors are integrated with an onboard controller that triggers audible alarms in case of overfilling or sudden loss of urea from within the tank. These precautions prevent spills and ensure optimal usage of the solution.

The design and construction of the urea tanks and pipelines are tailored specifically for this purpose, ensuring they are rendered impervious to the stored materials. This measure guarantees the integrity and containment of the urea aqueous solution, mitigating any potential risks associated with its storage and use in the SCR abatement system.

6.1.3 Energy Use

The operation of the Installation involves the consumption of electricity, fuel, and mains water. The estimated quantities to be used are specified in Attachment-4-6-1 of the application and are shown below in Table 6.1 below.

Table 6.1 Summary of the Estimated Current and Future Resource use at the Installation

Resource	Estimated Current Quantity per annum	Estimated Future Quantity per annum
Electricity (purchased) (average consumption)	248,720 MWh	318,799 MWh
Total Electricity (generated and used) (average consumption)	248,720 MWh	318,799 MWh
Electricity (generated and exported)	N/A	N/A
Natural Gas	N/A	N/A
Fuel Oil	1083.23 tonnes annually	1,409.59 tonnes annually
Water (Public Supply)	17,886 m ³	18,972 m ³

The applicant employs a variety of technologies to maximise the efficient use of energy within the Installation. The Installation is operated in accordance with an Energy Efficiency Management System (ENEMS) as well as the requirements of BAT.

The application of BAT provides for the efficient use of resources and energy in all site operations. It requires an energy audit to be carried out and repeated at intervals as required by the Agency and the recommendations of the audit to be incorporated into the ENEMS.

The applicant is focused on efficiency and continuous innovation across global infrastructure. AWS is committed to achieving Amazon's goal of net-zero carbon by 2040. AWS is committed to building a sustainable business for their customers and the planet. In 2019, the Operator co-founded The Climate Pledge—a commitment to be net zero carbon across their business by 2040. AWS is investing and innovating in efficiency in every aspect of their operations and is on a path to be powered by 100% renewable energy by 2025.

6.2 INTERMEDIATES OR PRODUCTS

There are no intermediates or products produced as part of the data storage operations.

6.3 WASTE MANAGEMENT

For the Installation, including the extended section, there is minimal solid and liquid waste produced at the data storage facilities. The waste comprises mainly domestic wastes, kitchen wastes, packaging wastes, non-hazardous WEEE, E-Waste, filters, waste oils and spent batteries. A more detailed description of the waste types and their management is provided in Section 8 of this application.

All waste materials are segregated into appropriate categories and stored in appropriate bins or other suitable receptacles in designated, easily accessible areas of the Site.

Packaging waste associated with rack deliveries to the data storage facilities is collected in recycling bins.

The small amounts of hazardous waste generated are stored in designated storage areas. The waste is covered, and a mobile retention bund is in place to contain any liquid waste that requires storage, where required. The waste is collected from these areas by an authorised waste contractor for recovery and / or disposal off-site.

Waste oil and filters and waste batteries are not stored onsite and are removed by the maintenance contractors during maintenance operations and change outs.

Waste sludge from the hydrocarbon interceptors is removed directly from each interceptor by a specialised and appropriately licensed contractor by means of a vacuum tanker.

Other smaller amounts of domestic waste are produced at the offices and other staff areas including the canteens. This includes paper and office waste as well as dry mixed recyclables and compost food wastes. Very small quantities of mixed municipal wastes may also be produced from time to time. These are separated at each of the individual data storage facilities and then are emptied into skips/larger bins externally for collection by the nominated waste contractor. The quantities are small due to the number of staff present onsite on a daily basis.

6.4 TANKS, BUNDS AND PIPELINES

All tanks, banded storage and pipelines have been designed for the specific purpose and contents. As required the structures will be rendered impervious to the materials stored therein. Fuel pipelines above ground are Carbon Steel, and below ground are Close Fit PLX (dual-contained pipe system).

Bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects fuel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.

The bulk fuel tanks / top up tank are located within a banded area meeting the requirements of Agency guidelines on the "Storage and Transfer of Materials for

Scheduled Activities". All bunds are capable of containing 110% of the volume of the largest drum/tank within the bund or 25 % of the total volume of the substance stored and are designed in accordance with the EPA's guidelines for the storage and transfer of materials for scheduled activities (EPA, 2004).

Delivery of fuel is a controlled process and is undertaken in accordance with the Fuel Delivery SOP. Deliveries are supervised and take place in designated bunded loading bays. Hydrocarbon interceptors are in place for the fuel tanker delivery bays to capture any spills.

The containerised emergency back-up generator housing includes retention bunding in the base of the container. There are leak detection systems within the bund and should hydrocarbon be detected in the base of the container the system sends an alarm signal to the BMS to alert EOTs. The onboard controller for individual generators is connected to the Building Management System (BMS).

The removal of any liquid waste (oil/diesel/HVO) from the interceptors is undertaken by a licenced contractor.

All bunds and underground pipelines are integrity tested following installation by the vendor.

7.0 EMISSIONS AND ABATEMENT TREATMENT SYSTEMS

This section describes the emissions from the Installation and the abatement or treatment system in place for those emissions and summarises any monitoring controls in place. There are no planned emissions to ground, ground water or surface water from the operational development therefore this has not been described.

7.1 AIR EMISSIONS

7.1.1.1 Existing Installation (Building W, Y and X)

Main Air Emissions

There are no main air emissions.

Minor emissions

The following is a list of the minor air emission points from each of the emergency back-up generators under the existing Licence. These emission points will remain in place and are shown in Drawing No. 21_123F-00-XX-DR-C-2000 Emission Layout Plan.

- Building W: 13 no. 5.44 MW_{th} emergency back-up generator stacks with a minimum height of 6 m above ground level.
- Building X: 20 no. 5.44 MW_{th} emergency back-up generator stacks with a minimum height of 16 m above ground level.
- Building Y: 7 no. 5.44 MW_{th} emergency back-up generator stacks with a minimum height of 16 m above ground level.

The installation requires a continuous supply of electricity to operate. During normal operations, the facility is supplied electricity from the national grid. Outside of normal

operations, the facility is first supplied electricity by some or all of the onsite battery installations and then by some or all of the onsite backup generators. Outside of routine testing and maintenance, the operation of these back-up generators is typically only required under the following emergency circumstances:

- A loss, reduction or instability of grid power supply,
- Critical maintenance to power systems,
- A request from the utility supplier (or third party acting on its behalf) to reduce grid electricity load.

The environmental impact of these minor emissions is set out in Section 7; Attachment-7-1-3-2-Air Emissions Impact of this license application.

Potential Emissions

These are emissions which only operate under abnormal process conditions. Typical examples include bursting discs, pressure relief valves, and emergency back-up generators. However, the emergency back-up generators are included as minor emission sources due to the routine testing and maintenance.

- 8 no. Fuel Top Up Tank Emergency Relief Vents (1 per each bulk tank, 7 no. for existing Installation, 1 no. for Extended Installation).
- Sprinkler Pumphouse associated with Building W: 2 no. 0.337 MW_{th} emergency back-up fire sprinkler pumps.
- Sprinkler Pumphouse associated with Building X and Y: 2 no. 0.423 MW_{th} emergency back-up fire sprinkler pumps.

The fuel storage bulk tanks at the facility each include two-way normal pressure (breather) vents. These produce minor vapour (trace) emissions.

Fugitive Emissions

Fugitive emissions are defined as low level diffuse emissions, mainly of volatile organic compounds, that occur when either gaseous or liquid process fluids escape from plant equipment. There are no such emissions anticipated from the installation. External pipelines containing fuel will have flange guards to prevent fugitive emissions.

7.1.1.2 Extended Installation (Buildings U and V)

Main Air Emissions

There are no main air emissions proposed.

Minor emissions

The following is a list of the minor air emission points from each of the emergency back-up generators for the expansion of the site, i.e. Buildings U and V. These emission points are shown in Drawing No. 21_123F-00-XX-DR-C-2000-Emission Layout Plan.

- Building U: 10 no. 6.49 MW_{th} emergency back-up generator stacks with a minimum height of 20 m above ground level.
- Building V: 1 no. 2.19 MW_{th} emergency back-up generator stack with a minimum height of 20 m above ground level.

- Building V: 1 no. 3.6 MW_{th} emergency back-up generator stack with a minimum height of 16 m above ground level.

The installation requires a continuous supply of electricity to operate. During normal operations, the facility is supplied electricity from the national grid. Outside of normal operations, the facility is first supplied electricity by some or all of the onsite battery installations and then by some or all of the onsite backup generators. Outside of routine testing and maintenance, the operation of these back-up generators is typically only required under the following emergency circumstances:

- A loss, reduction or instability of grid power supply,
- Critical maintenance to power systems,
- A request from the utility supplier (or third party acting on its behalf) to reduce grid electricity load.

The environmental impact of these minor emissions is set out in Section 7; Attachment-7-1-3-2-Air Emissions Impact of this licence review application.

Potential Emissions

These are emissions which only operate under abnormal process conditions. Typical examples include bursting discs, pressure relief valves, and emergency back-up generators. The emergency back-up generators are included as minor emission sources due to the routine testing and maintenance.

- 1 no. Fuel Top Up Tank Emergency Relief Vents (for the bulk tank).
- Sprinkler Pumphouse associated with Buildings U and V: 2 no. 0.57 MW_{th} emergency back-up fire sprinkler pumps.

Fugitive Emissions

Fugitive emissions are defined as low level diffuse emissions, mainly of volatile organic compounds, that occur when either gaseous or liquid process fluids escape from plant equipment. There are no such emissions anticipated from the extended installation. External pipelines containing fuel will have flange guards to prevent fugitive emissions.

7.1.2 Treatment and Abatement Systems

The emissions from the emergency back-up generators for the overall Installation (including the extended Installation) have been considered against the Medium Combustion Plant (MCP) Regulations (S.I No. 595 of 2017), which transposed the Medium Combustion Plant Directive ((EU) 2015/2193). Under the Regulations, new medium combustion plants which do not operate more than 500 operating hours per year, as a rolling average over a period of three years, shall not be required to comply with the Emission Limit Values (ELV) under the Regulations.

In order to reduce the risk to health from poor air quality, national and European statutory bodies have set limit values in ambient air for a range of air pollutants. Air dispersion modelling has been undertaken as discussed in Attachment-7-1-3-2-Air Emissions Impact to ensure that the appropriate ambient air quality standards are met. The modelling has been undertaken using the AERMOD air dispersion model in line with EPA Guidance Note AG4.

The stack heights for the emergency back-up generators have been designed to ensure that an adequate height was selected to aid dispersion of the emissions and

achieve compliance with these ambient air quality standards at all off-site locations (including background concentrations).

The emergency back-up generators (excluding the 1 no. 2.19 MW_{th}) for Buildings U (10 no. 6.49 MW_{th}) and V (1 no. 3.6 MW_{th}) are each fitted with an SCR unit to reduce exhaust emission gases to air. The SCR abatement is not required for compliance with the Regulations.

The results on the air dispersion model undertaken for the Installation is set out in Attachment-7-1-3-2-Air Emissions Impact. The USEPA methodology modelling results (based on 72 hours of operation) indicate that ambient ground level concentrations are below the relevant air quality standards for NO₂ for all scenarios modelled and no additional abatement systems are required.

7.1.3 Control and Monitoring

The emissions from the emergency back-up generators have been considered with respect to the Medium Combustion Plant (MCP) Regulations (S.I No. 595 of 2017), which transposed the Medium Combustion Plant Directive ((EU) 2015/2193).

The generators are for emergency back-up use only and are not anticipated to operate in excess of 500 hours per annum. Therefore, the emergency back-up generators are exempt from complying with the emission limit values subject to Section 13(3) of the Medium Combustion Plant (MCP) Regulations.

The emergency back-up generators (excluding the 1 no. 2.19 MW_{th}) for Buildings U (10 no. 6.49 MW_{th}) and V (1 no. 3.6 MW_{th}) SCR abatement system includes, electronic sensors checks for proper urea injection, ensuring that the catalyst is functioning effectively to reduce NO_x emissions. Any discrepancies or malfunctions are detected by the system. Monitoring and diagnostics of engine emissions via the SCR abatement systems is crucial to identifying any deviations from emission standards.

The emergency back-up generator operating hours are recorded on the Enterprise Asset Management System (EAM). For each generator, the Operation's Team manually enters planned and emergency run hours and the description of the operation (run reason) onto the EAM system.

The environmental team must approve all generator operation associated with on-load planned maintenance/testing to ensure the run hours do not exceed what is allowed under the site's Licence conditions. This is done automatically on ADSIL's internal maintenance approval system platform. The Operations teams must attach an excel spreadsheet to the approval request which shows all of the maintenance/testing events and associated run hours for the year to date. This 'Run Hour Spreadsheet' is maintained by the Operations Team.

When an emergency operation is logged, an email alert is sent to the Environmental Team for review and tracking. The Operations team also maintain an excel spreadsheet on which they record every emergency operation of a generator. The environmental team review this information after every emergency event.

7.2 EMISSIONS TO SEWER (WASTEWATER EMISSIONS)

Foul drainage is collected in the onsite foul network and will be discharged to the mains foul sewer.

7.2.1.1 Existing Installation (Building W, Y and X)

The outfall into the mains foul network from the existing licenced site is at four locations, one to the south of Building W (emission point SE1), one connection point to the east of Building W (SE1), one to the east of Building Y (emission point SE3) and one to the east of Building X (emission point SE4).

Emission point SE1 caters for flows from the fuel tank farm bund at Building W. Emission point SW2 caters for domestic foul flows from Building W as well as the welfare facilities associated with the Newbury GIS Substation, Control Building and Transformer yard. Emission point SE3 caters for domestic foul flow from Building Y. Emission point SE4 caters for foul flow from Building X and the fuel tank farm associated with Building X and Building Y

The emission discharge points are labelled SE1 through SE4 on Drawing 21_123F-00-XX-DR-C-1200-Foul Water Layout Plan included with the application.

7.2.1.2 Extended Installation (Buildings U and V)

The outfall into the mains foul network from Buildings U and V is at one location, to the west of Building U (emission point SE5).

Emission point SE5 caters for domestic foul flows from Buildings U and V.

The emission discharge point is labelled SE5 on Drawing 21_123F-00-XX-DR-C-1200-Foul Water Drainage Layout Plan included with the application.

The wastewater discharged from the Site will ultimately discharge to the Ringsend WWTP and will not materially impact on its capacity.

No monitoring is proposed for the foul water discharge.

7.2.2 Treatment and Abatement systems

There is no requirement for onsite treatment or abatement for foul effluent (domestic only) from the Installation. This is treated offsite at the Ringsend Wastewater Treatment Plant.

Foul drainage from the bulk tank farms, as well as the transformer compound and the Newbury Substation, are equipped with hydrocarbon interceptors. The locations of these are illustrated on Drawing 21_123F-00-XX-DR-C-1200. The hydrocarbon interceptors are equipped with an oil warning system which is connected to the BMS/EPMS critical alarm.

As there are no food preparation areas within the buildings, there is no requirement for the installation of a grease trap to prevent fats, oils and greases (FOG) from entering the foul network.

7.2.3 Control and Monitoring

As there is no separate process and foul water network on site, no monitoring of the overall sewer discharge is proposed.

The emission / offsite discharge points are labelled SE1, SE2, SE3, SE4, and SE5 on the Foul Water Drainage Drawing 21_123F-CSE-00-XX-DR-C-1200 Layout included with the application.

7.3 SURFACE WATER EMISSIONS

The emission to storm sewer consists of stormwater runoff from building roofs, yards, and the road network. The residual evaporative cooling water also discharges to the stormwater network. The cooling water discharged from the evaporative cooling units is effectively clean water that has passed through the cooling equipment.

7.3.1.1 Existing Installation (Building W, Y and X)

The attenuated stormwater for the existing licenced site drains at 2 no. emission points (SW1 and SW2). The site drainage is shown on Drawing 21_123F-CSE-00-XX-DR-C-1100-Surface Water Layout Plan included with this application. Attenuation storm cell 1 discharges at emission point SW1 into the existing 450mm storm sewer to the south of the Site. Attenuation storm cell 2 discharges at emission point SW2 into the existing 900mm storm sewer to the east of the Site. There is negligible retained water within the Attenuation storm cells under dry weather conditions.

The allowable greenfield runoff rate for Building W is restricted to pre-development flows of 294.8 litres per second (l/s) or 1061.28 cubic meters per hour (m³/hour). The allowable greenfield runoff rate for Building X and Y is 7 l/s or 25.2 m³/hour.

Evaporative cooling water is discharged at ambient temperature to the stormwater sewer. Evaporative cooling water has estimated conductivity values of between 1,200-1,500 µS/cm. See Attachment 7-1-3-2 Soil and Water Impact Assessment for further details.

7.3.1.2 Extended Installation (Buildings U and V)

The attenuated stormwater for the extended part of the site, i.e. Buildings U and V, drains at 1 no. Emission Point (SW3). The site drainage is shown on Drawing 21_123F-CSE-00-XX-DR-C-1100 included with this application. Attenuation storm cell 3 discharges at Emission Point SW3 into the existing 900mm storm sewer to the west of the extended part of the Site. There is negligible retained water within the Attenuation storm cells under dry weather conditions.

The allowable greenfield runoff rate for Buildings U and V is restricted to pre-development flows of 7.24 litres per second (l/s) or 26.64 cubic meters per hour (m³/hour).

The Clonshaugh Business and Technology Park storm sewer outfall into the Santry River, which is located to the south of the Site; the Santry River flows 5.15 km east, to the North Bull Island transitional water body, and ultimately into Dublin Bay.

Evaporative cooling water is discharged at ambient temperature to the stormwater sewer. Evaporative cooling water has estimated conductivity values of between 1,200-1,500 µS/cm. See attachment 7-1-3-2 for further details.

7.3.2 Treatment and Abatement systems

7.3.2.1 Existing Installation (Building W, Y and X)

For the existing Installation, the site stormwater network conveys the stormwater to one of 2 no. stormwater attenuation systems constructed on the site, or directly to the business park storm sewer. The residual evaporative cooling water that is discharged to the stormwater drainage system is associated with the evaporative cooling process, this is effectively clean water that has passed through the cooling equipment and does not require further treatment or abatement.

The discharge from site passes through Class 1 hydrocarbon interceptors to capture any hydrocarbons prior to outfall. The hydrocarbon interceptors are located down gradient of the storm cells, and prior to outfall.

The hydrocarbon interceptors are equipped with level detection and connect to the BMS/EPMS critical alarm. There is no further requirement for additional on-site treatment of stormwater from the Site.

Additional onsite control and mitigation measures are in place including:

- Double skinned day tanks, with high- and low-level alarms;
- Bunded bulk fuel tanks with high- and low-level alarms;
- Bulk fuel tank bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects fuel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.
- Hydrocarbon interceptors with level alarms; and
- Standard operating procedures for fuel delivery.

7.3.2.2 Extended Installation (Buildings U and V)

For the extended Installation, the site stormwater network conveys the stormwater via hydrocarbon interceptors to capture any hydrocarbons, to 1 no. stormwater attenuation system constructed on the site. The residual evaporative cooling water that is discharged to the stormwater drainage system is associated with the evaporative cooling process, this is effectively clean water that has passed through the cooling equipment and does not require further treatment or abatement.

The hydrocarbon interceptors are equipped with level detection and connect to the BMS/EPMS critical alarm. There is no further requirement for additional on-site treatment of stormwater from the Site.

Additional onsite control and mitigation measures are in place including:

- Double skinned day tanks, with high- and low-level alarms;
- Bunded top up tank with high- and low-level alarms;
- The top up tank bunds and delivery bays are equipped with hydrocarbon probes in the bund sump which detects fuel in the bund. This triggers closure of the sump discharge should hydrocarbon be detected in the sump and sends an alarm signal to the BMS to alert EOTs.
- Hydrocarbon interceptors with level alarms; and
- Standard operating procedures for fuel delivery.

7.3.3 Control and Monitoring

No online monitoring is proposed for the stormwater discharge. The only bulk chemicals stored that have the potential to result in soil, surface water or groundwater contamination are hydrocarbons; adequate control measures are in place to monitor any potential leaks or spills of hydrocarbons at source.

In accordance with the existing Licence (P1186-01) daily visual inspections for discolouration and odour are undertaken upstream of the stormwater discharge points, and pH, temperature, TOC and conductivity are monitored weekly (monitoring points SW1-1 and SW2-2). The same monitoring regime is proposed for the extended Installation at SW3-1).

Potentially polluted water that reaches the storm cells, (for example, in the case of a fire) shall be tested before release to the receiving storm water main. Any stormwater of unacceptable quality will be pumped out or otherwise removed from the attenuation storm cell(s) and disposed of appropriately. For the extended Installation, hydrocarbon interceptors are located upstream of the storm cell, which decreases the risk of potentially polluted water entering the storm cell. In the highly unlikely event of a major spill that entered the storm cell(s), inspection would be undertaken to ensure there is no subsurface contamination.

Due to the limited storage of bulk chemicals on site, and the robust control measures outlined above it is considered that no further monitoring or control methods are required for storm water.

7.4 EMISSIONS TO GROUND

There are no process emissions to ground from the installation.

7.5 NOISE EMISSIONS

During operation, the primary source of noise arises from building service plant which services the data storage facilities (i.e. the AHU air intake and the AHU air exhaust) as well as the operation of the emergency back-up generators during testing and emergency scenarios (i.e. generator air intake, generator air exhaust and generator engine exhaust).

An assessment of the noise emission impacts in line with the EPA *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)* has been conducted by AWN and included in Attachment-7-1-3-2- Noise Emissions Impact Assessment.

7.5.1 Treatment and abatement systems

Plant items have been selected in order to achieve the required noise levels in order that the plant noise emission levels are achieved on site during operations. Each emergency generator is contained within an acoustic container to dampen the noise, and in line attenuators for the generator stacks and exhausts are used where necessary.

Assessments have been taken place during the Installation's design process to ensure that the site operates within the constraints of best practice guidance noise limits adopted as part of the detailed noise assessment.

It is anticipated that the noise abatement measures are sufficient to ensure that the noise levels comply with the daytime, evening and night-time noise limits proposed, to be stipulated in the IE licence at the nearest noise sensitive receptors.

7.5.2 Control and Monitoring

Annual day time, evening and night-time monitoring will be undertaken in accordance with standard IE licence requirements.

8.0 MANAGEMENT AND PROCESS CONTROL SYSTEMS

8.1 ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

An Environmental Management System (EMS) has been developed for the site in accordance with the requirements of BAT. The EMS outlines the management of the site's environmental program and is certified by ISO14001. This EMS will be updated to incorporate the extended installation, i.e. Buildings U and V and associated ancillary development.

8.1.1 Building Management System (BMS) and Electrical Power Monitoring System (EPMS)

The installation operates a Building Management System (BMS) and an Electrical Power Monitoring System (EPMS) for control and monitoring, data collection and alarm/reporting of the air handling systems and mechanical utility systems site wide. Specifically, this includes the cooling systems, electrical supply, emergency back-up generators, water supply, fire alarms, fire detection and suppression systems and fuel oil use.

The BMS/EPMS ensures the facility is running an optimal efficiency and alerts the operators in the event of a malfunction through the use of visual and audible alarms. This includes malfunctions of the bulk fuel tank level indications and of the hydrocarbon interceptors, and any fuel bund or tank leaks.

The EPMS monitors the total fuel use as required for the GHG Permit (a variation request to the existing current GHG Permit Register No. IE-GHG173-04 has been accepted). The EPMS also controls the changeover in electrical supply from the grid to the emergency back-up generators in the event of an outage.

8.2 EMERGENCY RESPONSE PLAN

An on-site Emergency Response Plan (ERP) has been developed for the data storage facilities. It includes any requirements of the existing Installation, and will be updated to incorporate the extended Installation and any future development. The ERP details the required actions to be undertaken in the event of an incident on site and covers all possible emergency scenarios including fires, explosions, natural disasters, chemical spills, terrorism, etc. The ERP also includes the arrangements for contacting the emergency services and the relevant ADSIL personnel. The ERP is reviewed regularly by the Regional Environmental Manager and Regional Safety Manager and is updated as required.

It should be noted that the installation operates 24/7, 365 days a year. Therefore, there is no additional specific procedure required for emergencies outside normal working hours.

In addition to the ERP there is a disaster response procedure which provides instruction for the Disaster Response Action Team (AWS DRT).

8.3 STANDARD OPERATING PROCEDURES

Standard Operating Procedures (SOPs) have been developed for ADSIL sites and these will be continuously updated in conjunction with the EMS. These address all the relevant environmental matters onsite including, but not limited to;

- Spill prevention and response procedures,
- Pollution management and prevention,
- Waste Management,
- Fuel delivery,
- Emergency electricity supply and changeover procedures.

8.4 PREVENTATIVE MAINTENANCE

Preventative Maintenance (PM) is undertaken on mechanical moving parts equipment and electrical equipment including pumps, AHUs, humidifiers, generators, power transformers, etc. This maintenance includes all the regular and systematic tasks that ADSIL will carry out to ensure that the equipment is in an acceptable working condition, delivering required performance and expected durability.

Enterprise Asset Management (EAM) is the software platform ADSIL Infrastructure uses to maintain and manage its mechanical, electrical, and plumbing (MEP) equipment. This platform enables Infrastructure teams to do a variety of tasks:

- Track and coordinate planned and unplanned maintenance,
- Track the full life cycle of critical data centre assets,
- Identify defective equipment through mechanisms like field service bulletins (FSBs),
- Provide tracking for DCEO spare part inventory,
- Provide key insights for equipment failure, root cause analysis (RCA), and total cost of ownership (TCO).

The EAM team maintains the EAM system – the EAM team objective is to create and maintain a reliable maintenance platform that improves operational excellence, reduces both equipment failures and maintenance costs, and promotes standardized processes that support operations in ADSIL data centres.

A Maintenance Plan is developed before commissioning of equipment to include all the operations to be carried out in detail, as well as the means to be used and the estimated duration of the operations. The plan shall also include periodic assessments of the state of the installation and proposals for improvement.

In addition to the PM, regular inspections are carried out of all infrastructure onsite. The twice a shift inspection of infrastructure ensures that any issues are dealt with if they arise.

8.5 WASTE MANAGEMENT

Most of the wastes generated at the Installation are non-hazardous. Waste operations involve proper segregation and management of waste. No new waste types are produced as a result of the extended Installation.

All waste leaving site is recycled or recovered, except for those waste streams where appropriate recycling facilities are currently not available and the waste is disposed of as a last resort. All waste leaving the Site is transported by suitably permitted contractors and taken to suitably registered, permitted and / or licenced facilities. All waste leaving the Site is recorded and copies of relevant documentation maintained.

Any waste classed as hazardous is stored in a designated area (suitably banded, where required) and removed off site by a licensed hazardous waste contractor(s).

Waste oil, filters, waste batteries and waste sludge from the hydrocarbon interceptors are removed directly by the maintenance contractors as and when generated; however, the Operator will ensure appropriate permits and waste documentation, compliant with relevant legislation are provided by the licensed waste contractors.

Waste SOPs are in place for the operation of the data storage facilities and will cover the extended Installation. This ensures the proper management and recycling of wastes generated at the facilities. The waste SOPs enable the facility to contribute to the targets and policies outlined in *The National Waste Management Plan for a Circular Economy 2024 – 2030*.

8.6 ENERGY MANAGEMENT

Energy management forms an integral part of the Installation's management. Measures are in place to minimise energy use as far as possible. ADSIL is committed to continually improving their energy efficiency and reducing their carbon footprint.

A BMS/EPMS is in place to track the operation of critical sub-units and report back on energy efficiency of each section.

The Energy Efficiency Management System (ENEMS) for the Site in accordance with BAT will set out energy targets for the specific facility on an annual basis along with the responsible party; and targets will be assessed at the end of each year and reported in the Annual Environmental Report for the facility. Energy efficiency learnings are shared between sister facilities in Ireland and Europe.

The ENEMS includes Key Performance Indicators (KPIs) for energy efficiency. The efficient use of energy is monitored as part of the Site's continuous improvement programme to ensure all colleagues on site actively participate in the programme. Key process monitoring is carried out to monitor plant performance including water usage, energy consumption (fuel oil and electricity), hours of operation and power generated. The energy monitoring via the BMS is accessible in real time so that future decisions on energy management/optimisation can be made on a fully informed basis.

Electrical performance monitoring in respect of Power Usage Effectiveness (PUE) of the Site is undertaken on a continuous basis. PUE is an indicator for measuring the energy efficiency of a data centre. PUE is measured as a ratio of total amount of energy used by a computer data storage facility to the energy delivered to computing equipment. An ideal PUE is 1.0. Anything that isn't considered a computing device in

a data storage facility (i.e., lighting, cooling, etc.) falls into the category of facility energy consumption.

Further details of energy efficiency measures on site are included in Attachment-4-7-2- BREF-Energy Efficiency of this Application.

8.7 FIRE MANAGEMENT

A system is provided for detection, alarm, and fire suppression to enhance life safety and protection of property by the detection of fire, enabling an audio/visual alarm to be given such that emergency actions may be taken fully compliant with Irish and EU regulations and in accordance with the insurers' requirements. This fire management system will include the extended part of the site.

The data storage facilities are equipped with automated fire detection systems (heat and smoke). These are connected to main fire panels in the security offices which are manned at all times. In the event that a fire is detected, the fire panel will display the location of the detected fire. Once detected, the location of the potential fire will go into an alarm state. The fire detection and alarm systems are connected to the sprinkler system, and these will be triggered in the event of a fire.

The fire detection and alarm systems are subject to routine checks by site personnel and are inspected and tested by the external service provider on a regular basis.

9.0 CESSATION OF ACTIVITY

9.1 SITE CLOSURE

A certain amount of environmental risk is associated with the cessation of any licensable activity (site closure). An outline Site Closure report has been provided in Section 9 of this application. Details outlined in the Site Closure Plan include the following:

- Decommissioning of equipment will involve disconnecting all electrical connections and decommissioning the IT Hardware, the emergency back-up generators, the transformers, and all other relevant operational equipment at the installation,
- The emergency back-up generators, transformers, servers, and other equipment will be removed and sold to a third party or scrapped depending on the age/condition at the time of closure,
- Hazardous materials stored in chem-stores, raw materials in the operations area, and any other materials on site will either be returned to the suppliers or disposed of as hazardous waste by a suitable waste contractor; and
- All non-hazardous waste will be sent for appropriate recycling, recovery, treatment, or disposal.

9.2 BASELINE REPORT

There is no instructive site investigation information available for the part of the site on which the existing Installation is located. There is information available for the extended Installation part of the site, and along with information gathered from extensive intrusive

investigation works completed on other sites within the Clonshaugh Business and Technology Park, there is detailed understanding of the local environmental conditions.

Based on the data available the following conclusions have been made:

- Bedrock is greater than 20.0 mbgl and is overlain by shallow fill and low permeability boulder clay greater than 20.0 meters. As such there is no source-pathway-receptor linkage to the underlying aquifer.
- Based on the low-level detection of constituents of concern below the available soil and groundwater standards and guideline values, the site is of low environmental risk.
- The historic site uses have utilised chemicals as part of their manufacturing and printing processes these chemicals were likely to be stored in smaller containers and within the footprint of the building reducing the risk of potential historic contamination occurrences. The only bulk chemical likely to be present was fuel oil. There is no record of any spills at the site prior to redevelopment. However, based on the natural conditions present if any localised leaks or spills occurred, these would be contained within the clays on site and naturally degrade over time.
- There is bulk diesel storage proposed for the facility. However, the risk prevention measures present at the facility significantly reduce the potential for an environmental impact to soil or water to occur. These measures include bunded or double contained vessels, dual-contained fuel pipe system (when underground), spill management procedures and incorporation of interceptors on stormwater lines.
- Source-pathway-receptor linkages were assessed for the bulk storage areas. It was concluded that there are no direct pathways to either the soil and groundwater environment. Interceptors are installed on the surface water drainage. A leakage from a bulk tank would be fully contained in the designated bund or the double skin lining of the tank, with leaks during delivery fully contained within the continuous hard stand delivery area. Any leakage outside of the delivery area would be treated through hydrocarbon interceptors within the drainage system prior to discharge from the site.
- There is an indirect connection through the stormwater drainage to the Santry river and ultimately Dublin Bay. Based on the assessment of the source-pathway-receptor linkages, there no potential for impact of any downgradient Natura site (> 5.5km from the facility).

9.3 ALTERNATIVES

9.3.1 Process alternatives

In terms of technology, the Installation employs similar data server technology that is used by the Operator at their other facilities, in the greater Dublin area and around the world, and represents state of the art technology.

Alternative technologies are considered on an ongoing basis by the Operator as a part of each of its designs based on many factors including technical feasibility, environmental impact, efficiency, security, reliability, and cost.

The Operator is committed to continually assessing and improving this technology particularly with respect to minimising power and water consumption, in accordance with the goals of Irelands Framework for Sustainable Development *'Our Sustainable*

Future. The operator's designs are constantly evolving, and hardware is chosen with energy efficiency central to the decision-making process.

High efficiency EC direct drive fans are used in all air supply and extract systems serving the data storage rooms. Also, the office air conditioning is served by a variable refrigerant flow (VRF) refrigerant system. Typically, the energy efficiency of a VRF system will exceed that of traditional air-cooled chillers by 15-25%.

9.3.2 Alternative Mitigation Measures

The mitigation measures for the environmental aspects considered under this IE licence application (if relevant) are set out in the accompanying emissions impact assessment reports within Section 7 of this licence application.