

Electronic Copy

On behalf of Amazon Data Services Ireland Limited



13/02/2025

Reg. No.: P1181-02

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence review from Amazon Data Services Ireland Limited for an installation located at Drogheda IDA Business and Technology Park, Donore Road, Drogheda, Meath.

Dear Sir or Madam,

I refer to the application for a licence review received by the EPA on 24 September 2024.

Having examined the documentation submitted, I am to advise that the Agency is of the view that the documentation does not comply with the above mentioned legislation. You are therefore requested, in accordance with the regulations, to supply the information detailed below.

## **REGULATION 9 COMPLIANCE REQUIREMENTS**

### **Stormwater**

1. Condition 3.17 of P1181-01 which relates to Evaporative Cooling Water requires: *"The licensee shall carry out a study on the feasibility of diverting evaporative cooling water to sewer. The report shall be submitted to the Agency for approval within twelve months of the date of grant of the licence."* Describe what measures have been taken to address residual cooling water being discharged to the stormwater network.
2. It is noted that Hydrogen peroxide, which is used for cleaning of Air Handling Units (AHUs) and pipelines, ultimately discharges with the cooling waters into the stormwater system. Provide further information on the expected quantity of hydrogen peroxide to be stored and used on site and frequency of use the properties of the residual hydrogen peroxide prior to discharge.
3. Update the stormwater drawing to reflect the class of hydrocarbon interceptors to be installed on the stormwater drainage system.

## Sewer

1. Section 5.2 of the Non Technical Summary (NTS) states *"There is no process water discharged to the foul water network on site (domestic foul only), therefore no monitoring of the overall sewer discharge is proposed."* However, in other documentation it is noted that emissions to sewer is comprised of domestic effluent and drainage from the top-up tank bund to the North of Building A, flue drainage discharge, and drainage from the substation compound and transformer compound, which have the potential to contain hydrocarbons. Please confirm and update accordingly.
2. Confirm the class and type of hydrocarbon interceptor installed/to be installed in advance of emission point SE1 at the Oldbridge Substation transformer compound, flue drainage discharge and the top-up tank concrete bund.
3. The Operational report describes how rainfall that passes through back-up generators exhaust stacks will be discharged to the sewer network; however, this is not outlined in Attachment 7-1-3-1 Emissions Compliance Report. Can you please update and clarify this?
4. Please provide a copy of the S99E notification or the agreement letter from the IDA, as relevant to this application. Where a S99E has been issued, complete Attachment 7-3-1 Emission to Sewer.
5. Please confirm if any other waste waters will discharge at SE1.

## Air

1. It is note in the Operational report that *"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 back-up generators"*. Can you please provide more details of the onsite battery installations?
2. Please clarify the operational hours for the back-up generators and demonstrate how it is compliant with the planning permissions for both the existing installation and the proposed extension to the installation. Clarify if these hours are reflected in the model or update the model if necessary.
3. It is noted that some contour plot figures include background while others exclude background. Update all contour plot figures to include background.
4. Hydrotreated Vegetable Oil (HVO) is listed in the application as a potential fuel. Update Attachment- 7-1-3-2 Air Emissions Impact Assessment to reflect the assessment of potential impacts when HVO is used.
5. Clarity the source and nature of the HVO feedstock and outline how you intend to comply with the requirements of REDIII Directive.
6. We note that the Air Impact Assessment states that the River Boyne and River Blackwater SAC (site code 002299) is the closest ecological site to the facility. Confirm that the assessment was not only performed for this ecological receptor and that the assessment included all other relevant ecological receptors.
7. We note that the proposed operations scenario involved the emergency operation of 50 no. of the 54 no. back-up generators (the remaining 4 no. generators serving as a

“catcher” generator for Building A and Building B). Can you please confirm if specific individual temporary generators are assigned permanently as ‘catcher’ generators or does the assignment of ‘catcher’ generators alternate?

## Noise

1. Provide a drawing which illustrates the location of proposed noise monitoring locations A-D.
2. It is noted that the latest noise monitoring results are from 2019. Provide more up to date data if available.
3. Provide further information on what Scenario A, Scenario B and Scenario C relate to. Include the number of generators considered, run times, loading etc.
4. The predicted cumulative impact only includes the installation. Update the cumulative noise impacts to include other nearby and adjacent developments.
5. Can you please provide additional information on why a noise limit of 65dB is proposed at commercial Noise Sensitive Locations (NSL) during an emergency operational scenario?
6. We note that the installation is expected to run 24 hours a day, 7 days a week as outlined in the Noise Impact Assessment report; however, the assessment has taken into account daytime limit of 55dB only. Given that the generators could be operated for an extended period, it is considered that the standard daytime, evening and nighttime noise limit values should apply at the noise sensitive locations, given their proximity to the installation boundary. Can you please update the noise impact assessment to reflect this?

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIAR where applicable) to reflect the information provided in your reply, insofar as that information impinges on the non-technical summary.

The requested information should be submitted to the Agency within 8 weeks of the date of this notice, in order to allow the Agency to process and determine your application.

It should be noted that the eight-week period within which the Agency is to decide the proposed determination will commence on the day on which this notice has been complied with. If you have any further queries, please contact [licensing@epa.ie](mailto:licensing@epa.ie).

In the case where any drawings already submitted are subject to revision consequent on this request, a revised drawing should be prepared in each case. It is not sufficient to annotate the original drawing with a textual correction. Where such revised drawings are submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

Your response to this request is to be submitted via EDEN. Guidance on how to use this portal is available on the EPA website at [IE Licence application guidance | Environmental Protection Agency \(epa.ie\)](#).

Note that where the licensee fails to comply with this requirement in full and to the satisfaction of the Agency, the Agency may consider, having regard to the extent of the failure, whether the application can be considered pursuant to Regulation 10(2)(b)(ii) of the Environmental Protection Agency (Industrial Emissions)(Licensing) Regulations 2013 as amended, and may issue a notice in writing that the application cannot be considered by the Agency, outlining the extent of such failure. Alternatively, where there is a failure to comply with this requirement the Agency may activate Regulation 19 of the EPA (Industrial Emissions)(Licensing) Regulation 2013, which pertains to Withdrawal or Abandonment of an application for licence.

Please direct any queries to [licensing@epa.ie](mailto:licensing@epa.ie).

Yours Sincerely,

Noelle Crimmins O'Leary

Water, Energy & Business Support Programme

Office of Environmental Sustainability

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