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Ms. Sinead Whyte

On behalf of Amazon Data Services Ireland Limited

09/04/2025

Reg. No.: P1222-01

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from Amazon Data Services Ireland Limited for an installation located at Data Centre Building B1, Kildare Innovation Campus (KIC), Barnhall Road, Leixlip, Kildare.

Dear Ms. Whyte,

I refer to the application for a licence received by the EPA on 26 February 2025.

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

Emissions to water

1. Submit the surface and storm water drainage layout drawings provided to the planning authority.
2. The storm water monitoring regime proposed in the application for visual monitoring only (weekly) is insufficient (Attachment 7-7). Submit revised stormwater monitoring proposals, which include the following additions/changes as a minimum: visual (daily), pH (weekly), TOC (weekly), temperature (weekly), conductivity (weekly) and *“any other parameter as may be required by the Agency”*.
3. Submit confirmation that the installation has permission to discharge stormwater to the KIC drainage system.

Emissions to sewer

4. Submit the foul and process wastewater drainage drawings provided to the planning authority.
5. Submit confirmation that the installation has permission to discharge emissions to sewer to the KIC foul water drainage system.

6. Submit confirmation of communication and agreement with the relevant sanitary authority in respect of the proposed emissions to sewer from the installation and associated emission limit values.

Emissions to Air

7. Carbon monoxide has not been included in the air dispersion model (ADM) detailed in the air emissions impact assessment (Attachment 7-1-3-2). Update and resubmit the air emissions impact assessment with results for carbon monoxide included.
8. The air emissions impact assessment does not provide a confirmation statement verifying the source, accuracy and variability of the emission data used in the ADM. In addition, exit velocity emission data is not provided and a stack height of 18 m above ground level is stated to have been used in the ADM (versus a stack height of 18.6 m in planning). Revise, update and resubmit the air emissions impact assessment accordingly.
9. The cumulative air dispersion modelling detailed in the air emissions impact assessment does not take account of other nearby EPA installations such as IE registration number P0207-05. Revise the ADM and submit an updated air emissions impact assessment.
10. The air dispersion modelling of ecological impacts has only been carried out for one year (2017) and for only one (the nearest) sensitive ecological site. Revise the ADM to assess the ecological impact for a minimum of five years MET data, across all sensitive ecological sites (i.e. SPAs and SACs Natura 2000 sites) within the zone of influence and submit an updated air emissions impact assessment accordingly. Note: if it is the case that the most impacted site is not the nearest site, then the updated air emissions impact assessment should include the results for both (i.e. most impacted and nearest).
11. Submit the total nitrogen deposition process contribution for the installation alone as a percentage of the lowest end of the nitrogen deposition critical load range for the worst-case location in each Natura 2000 site within the zone of influence, using worst-case 5 year met data. Provide the NPWS Natura 2000 site identification code for each result.
12. The emergency generator fuel types referred to between the various planning and IE licence application documents include “fuel oil”, “HVO”, “other fuel oil” and “diesel”. Please confirm the precise fuel/s used for the emissions data input to the ADM.

Planning

13. Further to question 12, please confirm the precise fuel/s which planning was received for and clarify the precise fuel/s subject to the IE licence application.
14. With regard to the KIC masterplan, planning documents indicate that the installation which is the subject of this IE licence application (Data Centre Building B1 and associated standby generators) will be completed during Phase 1 however will only utilise 16MW of power from the grid. Following completion of Phase 3, this will increase to a c. max of 32MW of power. At which phase of the KIC masterplan has the installation’s activities, emissions and operations been based off in the IE licence application?
15. Further to the KIC masterplan, planning documents indicate that Phase 1 includes the development of combustion turbine generator/s (CTG/s) available to dispatch 16MW to the national grid, to match the Phase 1 power demands of Data Centre Building B1. Please confirm the following aspects relating to this:

- a. the total rated thermal input of the CTG/s to be developed during Phase 1,
- b. the relationship between Data Centre Building B1 and the KIC Phase 1 CTG/s – operationally, infrastructurally and ownership, and
- c. clarification why the Phase 1 CTG/s, insofar as how they may relate to the installation (Data Centre Building B1), have not been included as part of the IE licensable activities applied for.

BAT/BREF

16. The Large Combustion Plants (LCP) BAT/BREF is applicable to this installation due to the class of activity being applied for - while the LCP BATs relating to individual combustion units may not be applicable (due to their individual rated thermal input), the LCP BATs relating to the overall installation, however, still apply in general. Accordingly, carry out and submit an LCP BAT/BREF assessment.

AA Screening

17. The AA screening has not considered EPA Instruction note: *“Licence Application Instruction Note 2 (IN2) (DRAFT) Assessing the Impact of Ammonia Emissions to Air and Nitrogen Deposition from EPA licensable activities on European Sites, 2024”*, as may be amended or replaced by the Agency. Further to question 11, submit a revised AA screening assessment in accordance with the above EPA Instruction note.

HVO

18. Further to question 13, if it is the case that HVO fuel applies, outline how you will determine and ensure the following aspects of HVO supplied to the installation:
- a. appropriate source and nature of feedstock/s,
 - b. compliance with Waste Framework Directive requirements (applicable where used cooking oil or other waste materials are employed as feedstock), and
 - c. compliance with REDIII Directive requirements.

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS 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 12 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.

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

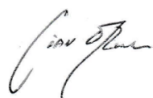
submitted, provide a list of drawing titles, drawing numbers and revision status, which correlates the revised drawings with the superseded versions.

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 applicant 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)/Regulation 13(4)(b) 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.

Yours faithfully,



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