

Electronic Copy

On behalf of Amazon Data Services Ireland Limited



22 August 2025

Reg. No.: P1186-02

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 Clonsaugh Business and Technology Park, Dublin 17.

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 31 July 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.

Air Emissions Impact Assessment

1. Provide the number of generators, hours and load for each installation which were included in the cumulative air assessment (i.e. P1171-01, Dataplex and Digital Realty)
2. Table 7.1, Table 7.2 & Table 7.3 show the process contribution from the installation in relation to NO_x, NH₃ and SO₂ at the North West Irish Sea SPA to be less than 1%, however it is stated in the table that it was considered for further assessment. Review the relevant tables and update accordingly.
3. Table 7.10, Table 7.11 & Table 7.13 show the process contribution in the cumulative assessment for NO_x, SO₂, Nitrogen deposition at the North West Irish Sea SPA to be less than 1%, however it is stated in the tables that it was considered for further assessment. Review the relevant tables and update accordingly.
4. Table 7.10 show the process contribution in the cumulative assessment for NO_x at South Dublin Bay pNHA to be less than 1%, however it is stated in the table that it was considered for further assessment. Review the relevant tables and update accordingly.
5. Review the calculations in Table 7.11 in relation to South Dublin Bay & River Tolka Estuary SPA and update accordingly.
6. Table 3.3 shows the critical load for N deposition at Santry Demesne pNHA to be 10-20 kg/ha/yr and the assessment criteria to be 15 kg/ha/yr. However Section 7.1.4 and 7.2.4 of the report refer to a critical load range of 5-10 kg/ha/yr and a midpoint range of 7.5 kg/ha/yr. Clarify the critical load considered for Santry Demesne pNHA.

Appropriate Assessment

7. Ensure that any updates made to the air impact assessment, and which are relevant to the Appropriate Assessment are included in the AA screening report.

Storm water

8. Provide evidence that permission has been received from the IDA allowing discharge from the installation (existing and proposed) to their storm water drainage network.
9. In the event hydrocarbon interceptors alarm, clarify what, if any, automative shut off systems are in place to prevent discharge of storm water from the installation.
10. Describe how used firefighting water will be managed for the installation (existing and proposed).

Cooling water

11. Clarify how the installation (existing and proposed) will comply with BAT 14 of LCP BAT.
12. For each building describe accurately the evaporative cooling water system. This description should include, but not limited to the following:
 - (a) The criteria for when evaporative cooling process water is required.
 - (b) How the evaporative cooling water system operates when cooling is required and not required.
 - (c) Details relating to draining of sumps/ pipe/ troughs etc. including frequency of draining and quantities of discharge.

Sewer

13. Provide evidence that permission has been received from the IDA allowing discharge from the installation to their foul network.
14. Provide a S99E from Uisce Eireann or evidence that a S99E from Uisce Eireann is not required for the foul drainage line serving the fire sprinkler pumphouse located to the south of Building U.
15. Describe the drainage system in place at the fire sprinkler pumphouse located between Building Y and Building W. Describe how any spills or leaks will be managed.

Noise

16. It is noted that Scenario C as described in the Noise Impact Assessment dated June 2024 and the Noise Impact Assessment dated June 2025 are different in the number of generators to be tested and the selected building. Provide a rationale for this different approach.
17. Provide details as to why no noise monitoring location has been selected to represent the noise sensitive receptors located to the east of Building Y and W.

Accidents

18. Clarify which drainage system (i.e. storm or foul) any leaks or spills arising from the containerised generators at Building Y, W U, & V will discharge to.
19. Clarify which drainage system (i.e. storm or foul) any leaks or spills arising from the generators at Building X will discharge to.

20. Clarify what leak detection system, if any, is in place at the transformer compounds (existing and proposed).
21. Further to Condition 3.11 of P1186-01, clarify the class and type of hydrocarbon interceptors to be installed.

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 **one week** 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 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.

Yours Sincerely,

Brid Horgan

Water, Energy & Business Support Programme

Office of Environmental Sustainability

Tel: 053 – 9160600