

17 October 2025

Office of Environmental Sustainability
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford

RE: EPA Industrial Emissions Licensing Application P1181-02

Dear Sir/Madam,

On behalf of the applicant, Amazon Data Services Ireland Limited, please find below responses to queries raised during the EPA site visit to the Installation on 10 October 2025.

Documents accompanying this response include:

- ▶ Attachment-7-1-3-2 Air Emissions Impact Assessment_Rev
- ▶ Updated Noise Monitoring Location Drawing (showing the Oldbridge Substation outside the Licence boundary)

Oldbridge Substation

It is confirmed that the Oldbridge Substation building is not within the Licence boundary, as shown in Drawing 21_123G-CSE-00-XX-DR-C-0002 Site Layout Plan by means of a red line and blue shading. The Noise monitoring location drawing has been updated to show the Oldbridge substation delineated in red and hatched to clarify it is not within the boundary. The Transformer compound adjacent to the substation is included within the licence boundary.

Attachment-7-1-3-2 Air Quality Impact Assessment Report

All amendments to Attachment-7-1-3-2 Air Emissions Impact Assessment are shown in red for ease of reference. In relation to queries raised by the EPA, please see responses as follows:

- Table 2 of the report, states N/A for the River Boyne and River Blackwater SPA. Is this correct?
 - This is correct - the APIS website states "No comparable habitat with established critical load estimate available".
- Page 22, is there a typo in this sentence, "*As a result, the maximum hourly emission rates from the back-up generators were reduced by x no. hours / 8760*".
 - This is not a typo. This is giving an example of the method, the following sentence states the number of hours as 100.

HEADQUARTERS

- Page 37, Section 5.0, Paragraph 3, where it previously stated “48 of the 52 back up generators”, this was a typo, it has been amended to “50 of the 54 no. back-up generators”. Also in this paragraph, *the last sentence has been amended to* “Therefore, in the event of a power failure at the site no more than 50 of the 54 no. back-up generators will be operational at any one time.” It is confirmed that the model included 50 generators operational during an emergency event.
- Page 37, Section 5.0, Paragraph 4, where it previously stated “In addition to the 52 no. emergency back-up generators”, this was a typo, and has been amended to “54 no. emergency back-up generators”.
- Are the NOx levels in Table 10 correct?
- NOx levels have been reviewed and the backgrounds for the North West Irish Sea SPA have been revised. These had been based on a previous assessment, however following review were not deemed appropriate for the location of this assessment. The North-west Irish Sea SPA is not present on the APIS database and as it is located predominantly offshore background grid squares for all pollutants are not available. The maximum background levels along the coastline where the North-west Irish Sea SPA is in proximity to the project location have been used in the assessment. Section 6.1.6 and Section 6.3.5 of Attachment-7-1-3-2 Air Emissions Impact Assessment Report have been updated accordingly.
- Within Table 12 of the report, the testing times do not appear to be correct, e.g.:
 - ◆ Section 5.0 Test 1 states 30 minutes but Table 12 shows a 1 hr scenario
 - ◆ Table 12: Building B Test 1 and Test 2, hours of operation are different
 - ◆ Table 12: Building B is Test 2 for 1 hr per quarter or 1 hr per week?
- Table 12 has been updated to reflect the correct testing times / periods for each test type and Building. It is confirmed that Test 1 is 30-minutes in duration and weekly, and Test 2 is 4 hours in duration and once per quarter.
- Section 6.1.6.1 – In this section, the text outlines for NOx, the River Boyne & Blackwater SAC is the most impacted ecological habitat site, however Table 19 states that the PEC is only 23% of the critical level, whereas North-west Irish Sea is 42%. A similar query arose regarding SOx, in Section 6.1.6.2. The EPA requested clarification on this.
- The most impacted site is where the highest modelled Process Contributions (PCs) from the Installation occur, which is different to the PEC (Process Contribution plus background level). Therefore the most impacted site in terms of PC differs from the site showing the highest PEC % of critical level. Additional commentary has been added to the report in each case to provide clarity.

It should be noted that none of the amendments above change the results of the Air Dispersion Modelling or conclusions of the Air Quality Impact Assessment.

Winterisation

It is confirmed that winterisation occurs at the Installation for Building A, and will occur for Building B, as outlined in Section 4.3.2 of the Operational Report (Attachment 4-8-1). This occurs typically from the beginning of October to the end of March. During this period, the cooling water sumps are drained and not replenished.

Sincerely,

A handwritten signature in black ink, reading "Mairead Rawal". The signature is written in a cursive style with a large, looped 'M' and a trailing 'l' at the end of 'Rawal'.

Mairead Rawal
Senior Consultant
AWN Consulting