

EPA Application Form

7.3.2 - Equivalent Level of Protection (Sewer) - Attachment

Organisation Name: *

Amazon Data Services Ireland Limited

Application I.D.: *

LA011866

Amendments to this Application Form Attachment

Version No.	Date	Amendment since previous version	Reason
V.1.0	July 2017	N/A	Online application form attachment
As above	Mar 2018	Identification of required fields	Assist consistent completion of attachment

7.3.1 Equivalent Level of Protection (Emissions to Sewer)

Background information

In relation to emissions to sewer, Article 15 of the Industrial Emissions Directive (Directive 2010/75/EU) states:

With regard to indirect releases of polluting substances into water, the effect of a water treatment plant may be taken into account when determining the emission limit values of the installation concerned, provided that an equivalent level of protection of the environment as a whole is guaranteed and provided this does not lead to higher levels of pollution in the environment.

Furthermore, emission limit values (ELV's) applied by the Agency for an installation's emissions to sewer must satisfy the consent conditions (ELVs and other requirements) specified by Irish Water, as required by Section 99E of the EPA Act 1992 as amended.

(Note: To avoid unnecessary delays in the application assessment process, it is important that the applicant licensee liaises with Irish Water (or other water services authority responsible for the sewer network) at the earliest available opportunity, with a view to establishing consent conditions.)

Assessment of 'equivalent level of protection'

To comply with Article 15 above, the following must be demonstrated:

It must be demonstrated that the level of treatment of an installation's effluent, on and off site, is collectively equivalent to BAT and environmental quality standards will be observed in the receiving water (i.e., 'equivalent level of protection').

- (1) Consider the parameters relevant to the installation's emissions to sewer (i.e., characteristics of discharge)
- (2) Do sectoral BAT associated emission levels (BAT-AELs) exist for these parameters? These are the relevant sectoral BAT-AELs.
- (3) Do the emission limits proposed for installation comply with all the relevant sectoral BAT-AELs? If Yes, ok; if not proceed to (4) below.
- (4) If not, does the licence for the relevant Irish Water agglomeration discharge specify limits which comply with all/the remainder of the relevant sectoral BAT-AELs for the installation? If Yes, ok; if not proceed to (5) below.
- (5) If no to (3) and (4) above, the applicant/licensee needs to otherwise determine whether the level of treatment in the sewer network is sufficient to treat the installation's discharges to comply with relevant sectoral BAT-AELs.

Assessment of 'levels of pollution in the environment'

To comply with Article 15 above, the following must be demonstrated:

In granting a licence for an installation, and in accordance with Section 83(5)(a)(iii) of the EPA Act 1992 as amended, as well as in accordance with Articles 5 and 7 of S.I. 272 of 2009, the Agency must ensure that the quality of any relevant receiving water is not impaired or that the relevant Environmental Quality standards are not exceeded. It must

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be demonstrated whether or not, upon discharge from the Irish Water WWTP, the environmental quality standards¹ (EQSs) for the receiving water will be breached as a result of the installation's discharges. (i.e. 'does not lead to higher levels of pollution in the environment')

Details on level of protection provided (on and off-site)

Please provide details in the table below on the installation emissions to the sewer; the processes which contribute to the emissions, the type of on-site treatment (if any), off-site treatment (if any) and the proposed maximum daily flows.

Table 1: On-site treatment – abatement at installation				
Emission Reference	Proposed / Existing	Process Description	Abatement	Proposed max. flow (m ³ /day)
SE1	Existing	Surface water runoff from Building W fuel unloading area and fuel tank bund	Full retention Class 1 Hydrocarbon Interceptor	29
SE2	Existing	Domestic effluent and surface water runoff from transformer bay compound	Full retention Class 2 Hydrocarbon Interceptor	19
SE3	Existing	Domestic effluent and surface water runoff from Building X/Y fuel unloading area and fuel tank bund	Full retention Class 1 Hydrocarbon Interceptor	32
Total:				90
Off-site treatment – Municipal Waste water treatment plant (MWWTP)				
Note 1: At the emission point for both SE2 and SE3, the stormwater will have combined with domestic effluent, however the licensable discharge authorised by Uisce Eireann relates to the surface water runoff component only.				
Name of sewer network/agglomeration: Ringsend. Ringsend Wastewater Treatment Plant, Reg. No. D0034-02				
Peak Hydraulic Capacity (m ³ /day): 959,040 (as constructed) Average Hydraulic loading (m ³ /day): 493,240 Based on the latest published AER for Ringsend WWTP (2023)				
Responsible authority for network/agglomeration: Uisce Eireann				

¹ EQSs as specified in Schedule 5 of *European Communities Environmental Objectives (Surface Waters) Regulations 2009* as amended.

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Type of treatment: Ringsend WWTP with a Plant Capacity PE of 2,100,000, the treatment type is 2 - Secondary treatment. Ringsend WWTP is scheduled for WWTP upgrades to a capacity of 2.4 million p.e.

Receiving water name (and waterbody type): Liffey Estuary Lower (Transitional Waterbody) & Dublin Bay (Coastal Waterbody)

No. of dilutions available in the receiving water: minimum dilution factor of 2 to 6 in the near field mixing zone.

Waste water discharge authorisation: **(Y/N)** Refer to S99E response issued to EPA by Uisce Éireann, dated 7 November 2025.

The maximum daily discharge volumes from the installation, represents about 0.0094% the Peak Hydraulic loading from the Uisce Éireann municipal wastewater treatment plant (Ringsend WWTP).

The maximum daily discharge volumes from the installation, represents about 0.0182% of the Average Hydraulic Capacity from the Irish Water municipal wastewater treatment plant (Ringsend WWTP).

The Agency's most recent national annual report/the most recent AER indicates that this MWWTP is:

- in compliance with the discharge limits for the following parameters: **pH**
- not in compliance with the discharge limits for the following parameters: **BOD, COD, TSS, TP, TN**

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Assessment details

Please enter the required details in the assessment table below.

Edit the parameters in column 1 in accordance with the installation's characteristics of emissions to sewer.

Enter any limits specified by Irish Water (or other water service authority) in column 3.

In column 4 determine, if necessary for any parameter, the concentration of the installation's discharges after having received any treatment at the installation prior to discharge, and after having received any treatment in the sewer network/agglomeration prior to discharge.

Specify the relevant the BAT-AELs in Column 5.

Specify the relevant the EQSs in Column 6.

Table 2				
Parameter (sample parameters included below)	Uisce Eireann/ WSA	After on and off site treatment	BAT-AEL	EQS
Temperature	--	N/A	N/A	No greater than 1.5°C rise in ambient temperature
pH	--	N/A	N/A	Soft Water 4.5 < pH < 9.0 Hard Water 6.0 < pH < 9.0
	mg/l	mg/l	mg/l	mg/l
Biological Oxygen Demand	200	25 (WWDL ELV)	N/A	≤ 4.0 mg/l (95%ile) for transitional waterbody
Chemical Oxygen Demand	400	125 (WWDL ELV)	N/A	N/A
Suspended Solids	200	35 (WWDL ELV)	N/A	N/A
TPH	5	< 5	N/A	N/A
Mineral Oil	10	< 10	N/A	N/A
Note: The relevant Large Combustion Plant BAT-AELs refer to direct discharges from <u>flue-gas treatment</u> to a receiving water body at the point where the emission leaves the installation.				

Table 3: Please include any other information you consider relevant in the (free text) box below:

Uisce Éireann (Wastewater Source Control & Licensing) have been consulted regarding the surface water runoff discharge to foul sewer and have set the limits for the discharge (as shown in Table 2 above).