



EdgeConneX Ireland Limited

Non Technical Summary

Attachment-1-2

August 2023

Licence Application (LA011009)

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1.0 INTRODUCTION

This Non-Technical Summary presents an overview of the Industrial Emission (IE) License application submitted by EdgeConneX Ireland Limited (hereafter referred to either “EDC” or “the applicant”) to the Environmental Protection Agency (EPA) in Ireland. The purpose of this Non-Technical Summary is to concisely communicate the essential elements the application in a reader-friendly manner. The proposed Energy Center and Data Center Installation subject to this IE Licence application is located at Newcastle Road, Lucan, Co. Dublin, K78 P3K1, National Grid Reference E 302644, N 231915. The location of the subject site is shown on DWG-001-Site Location Map included with this application, and covers c. 22.1 hectares (ha) in total (hereafter referred to as the ‘Site’).

2.0 DESCRIPTION OF ACTIVITY

The development when constructed will consist of 1 no. energy centre building and 4 no. single storey data centres with associated office and service areas; the Installation will comprise of the following:

- ESSDUB97 (c. 3,045sqm) and ancillary development will contain 20 no. gas plant (18 operational +2 standby) with associated flues (each 25m high) will facilitate.
- EDCDUB04 consists of 2 no. single storey data centres (c. 13,900sqm), both with associated plant at roof level; with 24 no. emergency diesel generators with associated flues (each 15m high) located in a generator yard to the west of the data halls, a single storey goods receiving area / store and single storey office area (c. 3,044sqm) is located to the east of the data halls as well as associated water tower and sprinkler tank and other services;
- EDCDUB05 consists of 2 no. single storey data centres (c. 12,797sqm), both with associated plant at roof level; with 24 no. emergency diesel generators with associated flues (each 25m high) located in a generator yard to the west of the data halls, that will be attached to a single storey goods receiving area / store and single storey office area (2,404 sqm) located to the east of the data halls as well as associated water tower and sprinkler tank and other services;
- Ancillary site wide development includes roads, site security fencing, car parking spaces, sheltered bicycle parking, green walls, underground drainage and 2 no. attenuation ponds located to the north of the site, as well as site wide landscaping.

When constructed the installation will be in operation 24 hours a day, 7 days a week. Once operational, a total 100 people will be working in 3 shifts as follows; 08:00-16:00 - 40 Employees, 16:00-00:00 - 40 Employees, 00:00 – 08:00 – 20 Employees.

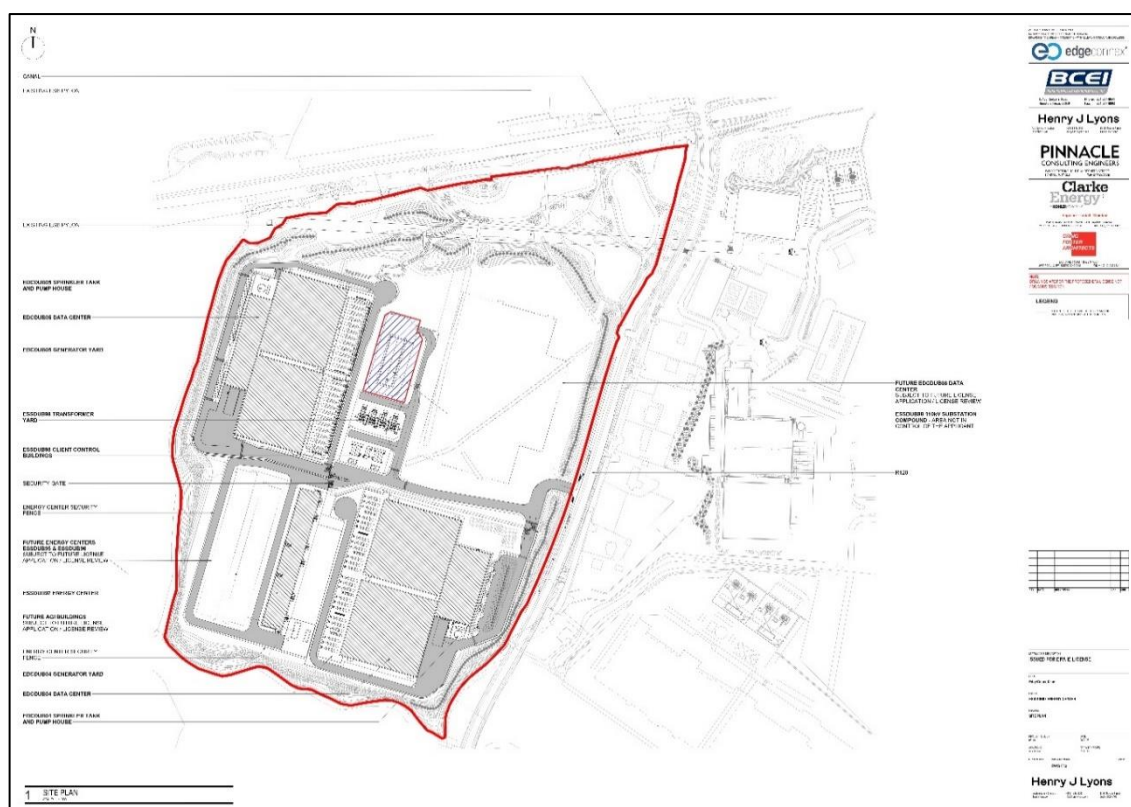


Figure 2.1 *Site Plan (DWG-003-Site Plan)*

2.1 ACTIVITY TO BE LICENSED

The gas plant in ESSDUB97 will act as the alternative source of power for the Installation when the connection to the national grid is unavailable. ESSDUB97 consists of 20 no. 10.3 Megawatt Thermal Input (MW_{th}) gas plant. In addition to the ESSDUB97, the individual EDCDUB04 and EDCDUB05 Data Centres will include containerised emergency (diesel-powered) generators located in the external generator yard adjoining each of the Data Centre buildings. EDCDUB04 and EDCDUB05 each includes 24. no 6.9 MW_{th} emergency diesel generators for a total of 48. no 6.9 MW_{th} diesel-powered emergency standby generators at the Installation.

The Permitted Development includes 2 no. additional Energy Centre Buildings (named ESSDUB95 and ESSDUB96) these Energy Centre are not currently required to service the Installation and therefore; ESSDUB95 and ESSDUB96 are not included with this IE licence application. If there is a need for ESSDUB95 and ESSDUB96 in future, agreement with the EPA will be sought through the undertaking of an Industrial Emissions Licence Review.

The relevant requirement for an Industrial Emissions (IE) Licence is Activity Class 2.1 of the First Schedule of the Environmental Protection Agency EPA Act 1992 (as amended) (EPA Act 1992). Activity Class 2.1 states:

Combustion of fuels in installations with a total rated thermal input of 50 MW or more

The combined thermal input (total capacity) from the gas plant and emergency diesel generators is 537.20 MW_{th}, this exceeds the 50MW_{th} threshold of Class 2.1 First Schedule of the EPA Act 1992. The applicant is applying to the Environmental

Protection Agency (EPA) for an Industrial Emissions (IE) Licence principally relating to the operation of emergency back-up generators under Activity Class 2.1.

3.0 SITE LOCATION

The development site covers approximately 22.1 hectares, consisting of partially greenfield and brownfield lands situated in Ballymakailly, South Dublin, Dublin 22. The area is bordered to the north by the Grand Canal and the proposed Grand Canal Natural Heritage Area (pNHA), and to the west by open agricultural lands. It is situated west of the Grange Castle Business Park and north of Grange Castle West, which aims to attract foreign investments.

Located about 5 km west of the M50 Orbital Motorway, the site enjoys strategic road and mainline rail connections to the west and south of Ireland. It is also well-connected to the city center, Dublin Airport, and Dublin Port, all within 15 kilometers of the site.

The immediate surroundings are predominantly commercial and industrial, with extensive development in the Grange Castle Business Park and Profile Park, hosting various industrial campuses, including pharmaceutical, data centers, and food manufacturing facilities. The Microsoft data center campus is situated to the south-east of the site, while the Casement Aerodrome Baldonnel is approximately 2.2 km to the south.



Figure 3.1 Site Location Map – Indicative site area shown (Source: Google Maps)

4.0 PRIMARY PROCESSES

The Operational Report (Attachment 4-8-1) details the core operations of the Installation in relation to the IE Licence. This report describes the primary processes employed at the Installation, providing a comprehensive understanding of its activities under the terms of the license.

4.1.1 Energy Centre (ESSDUB97)

ESSDUB97 will be built to provide power to each data centre, if and, when required. ESSDUB97 consists of 20 no. 10.3 MW_{th} gas plant (18 operational + 2 standby) with associated flues (each 25m high). A maximum of 18 of the 20 gas generators will run simultaneously during a power outage. Auxiliary equipment required to run each gas plant and generate electricity include the following:

- Starting equipment
- Lubricating oil system
- Cooling water system
- Selective Catalytic Reduction (SCR) (emissions abatement)
- Ventilation and temperature control
- Exhaust condensate collection and disposal
- Electrical synchronisation and power control

ESSDUB97 ensures reliable performance through monitoring and control systems. These systems continuously monitor the gas plant, maintaining safe operations and responding promptly to anomalies while balancing the load.

In order to reduce Nitrogen Oxides (NO_x) emissions, the gas plant are equipped with a Selective Catalytic Reduction (SCR) system that uses urea injection to convert NO_x into harmless nitrogen gas and water vapor.

4.1.2 Emergency Diesel Generator(s)

The facility is equipped with containerized emergency diesel generators located externally in the generator yard of each data center building. These generators are immediately activated in the event of a temporary electricity supply failure, ensuring uninterrupted operation of the data center buildings.

When constructed the generator yard at EDCDUB04 includes 24 no. 6.9 MW_{th} diesel powered emergency generators with associated flues (each 15m high). A maximum of 20 of the 24 back-up emergency generators will run simultaneously during a power outage, 4 of the 24 back-up emergency generators are “catcher” generators to provide redundancy for the other generators.

Each generator has a locally stored fuel in a belly tank the site does not have a bulk tank farm or bulk diesel storage, and fuel transfer occurs only from the belly tank to the generator. The emergency generators are securely enclosed within specialized containers, incorporating several safety measures. Drip trays are strategically placed to catch potential spills during fuelling, and double-skinned belly tanks with gauges and controllers prevent overfilling and monitor fuel levels. The containerized housing also features retention bunding at the base, with leak detection systems for rapid alerts in case of leaks, minimizing environmental risks.

The advanced onboard controller of each generator allowing for monitoring and control. This integration provides real-time insights into the generators' performance

and facilitates responses to any operational issues, ensuring optimal functionality and reliability.

It is expected that these generators will be used less than 500 hours per year. The emergency generators are fitted with data loggers which track the number of hours each generator operates.

4.1.3 Data Storage Building(s) (EDCDUB04 and EDCDUB05)

The Installation's main purpose is to offer secure data storage for clients, allowing them to store their information in a reliable facility off their premises. Data centers EDCDUB04 and EDCDUB05 provide state-of-the-art technology, including power, cooling, and connectivity, along with robust security measures to control access to the stored information.

To manage the heat generated by the hardware and equipment in the data centers, a closed-loop cooling system is utilized. The cooling system uses a closed-loop circulation system to transport heat away from the IT equipment. The closed-loop cooling system in the data centre utilizes a fluid with 20 - 35% glycol water solution, which is initially filled during installation and requires only infrequent top-ups thereafter. This closed-loop design is more sustainable as it doesn't consume water during cooling. Chillers further enhance energy-efficient cooling, with the refrigerant undergoing phase changes to absorb heat from the indoor air and release it outside the building.

The cooling process is regulated by a control system equipped with sensors that monitor temperature, humidity, and air quality. The system adjusts the settings and EC motors of the air handling units (AHUs) based on real-time data to maintain the desired temperature and optimize energy consumption.

4.2 WATER, WASTEWATER, AND STORMWATER DRAINAGE INFRASTRUCTURE

4.2.1 Potable Water Supply

The data centre's domestic water use primarily includes staff amenities, such as restroom facilities, kitchen areas, and drinking fountains, serving the needs of the on-site personnel as well as firefighting water. There is no industrial water demand. When constructed a connection will be made to the existing 400mm Ø trunk main located along the R120 (Newcastle Road).

4.2.2 Foul Wastewater (Sewer)

When constructed sanitary effluent from staff amenities, washroom facilities and break room areas from the data centre buildings will be collected and will connect via a new 225mm Ø gravity foul sewer and discharge into a single outfall (SE1) into the existing 450mm Ø sewer located to the east of the site. There is no process or industrial wastewater. All on-site foul sewers have been designed to be a minimum 225mm Ø diameter pipes, with gradients designed to achieve self-cleansing velocities.

For more information on the on the foul wastewater drainage layout refer to DWG-005-Drainage Plan-Foul included with this application.

4.2.3 Stormwater Drainage Systems

When constructed rainwater runoff from building roofs, yards and the proposed road network will be collected in newly constructed gravity surface water drainage system, and convert to the attenuation ponds, to be discharged at emission point SW1 to an existing private stormwater main within the R120 (Newcastle Road) to the north-east of the site.

For more information on the surface water network layout refer to the drawing DWG-004-Drainage Plan-Surface Water included with this application.

4.3 ENVIRONMENTAL CONDITIONS

4.3.1.1 Soil, Groundwater and Surface Water

A Complete Baseline Report for The Site has been produced and included in Attachment-4-8-3 Complete Baseline Report. The baseline report presents conditions of the Site as it existed prior to the construction and operation of the Installation.

The Complete Baseline Report concluded that soil quality data is limited for the facility. However, based on available data, there is no evidence of contamination within the soil or groundwater beneath the site.

The relevant bulk hazardous substance (substances stored or used onsite and which are classified as hazardous by the EPA under the Groundwater Regulations and contained in bulk storage) stored on site is diesel for emergency generators, and lubricating oil systems for the natural gas engines and emergency generators. The risk prevention measures at the facility significantly reduce the potential for an environmental impact to soil or water to occur.

Source-pathway-receptor linkages were assessed for the bulk storage areas. It was concluded that there are no direct pathways to either the soil and groundwater environment.

4.3.1.2 Air

Ambient air quality monitoring was not undertaken as part of the preliminary assessment for this site. Reference has been made to the latest air quality monitoring programs that have been undertaken in recent years by the EPA. Attachment-7-1-3-2-Air Emissions Impact of this application provides a summary of the relevant air quality that has been used as a baseline for the air dispersion modelling completed for the project.

4.3.1.3 Noise

Environmental noise surveys have previously been conducted to quantify the existing noise environment. The survey was conducted in general accordance with guidance contained in the EPA NG4 publication and ISO 1996-2:2017 *Acoustics - Description, Measurement and Assessment of Environmental Noise -Determination of Sound Pressure Levels*. Specific details are set out in Attachment-7-1-3-2-Noise Emissions Impact Assessment of this application.

5.0 BEST AVAILABLE TECHNIQUES AND COMMISSION IMPLEMENTING DECISION

Section 86A(3) of the EPA Act 1992 as amended, requires that the Agency shall apply BAT conclusions as a reference for attaching one or more conditions to an IE Licence. The installation has principally been assessed against the BAT conclusions contained in Table 5.1:

Table 5.1 *Applicable BAT documents*

Horizontal BREF	Publication date	Attachment
Best Available Techniques (BAT) Reference Document for Large Combustion Plants	2021	Attachment-4-7-1-BREF - Large Combustion Plants
Reference Document on the Best Available Techniques for Energy Efficiency	2009	Attachment-4-7-2-BREF - Energy Efficiency
Reference Document on the Best Available Techniques on Emissions from Storage	2006	Attachment-4-7-3 BAT REF - Emissions from Storage
Reference Document on the application of Best Available Techniques to Industrial Cooling Systems	2001	Attachment-4-7-4 BAT REF - Industrial Cooling Systems

The included assessment documents has demonstrated that the installation will comply with all applicable BAT Conclusion requirements specified in the CID and will be in line with the guidance specified in the other relevant BREF Documents and relevant national BAT notes.

The gas-powered engines and diesel-powered emergency standby generators have been evaluated in accordance with the Best Available Techniques (BAT) Reference Document for Large Combustion Plants (LCP). This document is considered the most relevant sector-specific reference for the assessment. It is crucial to emphasize that the BAT for LCP applies exclusively to plants with a rated thermal input of 50 MW_{th}, whereas the gas powered engines and the diesel-powered emergency standby generators are below this threshold. In addition to the threshold test the applicability of the LCP under the 'Aggregation Rules' has been considered. The Aggregation Rules within S.I. No. 566/2012 - European Union (Large Combustion Plants) Regulations 2012 states for the purpose of calculating the total rated thermal input of a combination of combustion plants; combustion plants with a rated thermal input below 15 MW shall not be considered. The gas powered engines and diesel powered emergency back-up generators are a rated thermal input below 15 MW, therefore the aggregation rules do not apply.

6.0 EMISSIONS AND ABATEMENT TREATMENT SYSTEMS

This section describes the emissions from the unit operations above and the abatement or treatment system in place for those emissions and summarises any monitoring controls in place.

6.1 AIR EMISSIONS

Main Air Emissions

The main emission related to the facility are listed below:

- ESSDUB97 - 20 no. gas plant (18 operational + 2 standby) with associated flues (each 25m high);

The gas powered engines in the facility are required to be available to operate at all times throughout the year. Therefore at a worst case it must be assumed that the gas plant may have to run 24/7, 365 days. The emission points from each generator have been labelled Emission Points A2-1 to A2-20 in Attachment 7-4-1. These emission points are shown in DWG-006-Main Air Emission included with this application.

Minor Air Emissions

The minor emission related to the facility are listed below:

- EDCDUB04 - 24 no. emergency diesel generators with associated flues each 15 meters above ground level;
- EDCDUB05 - 24 no. emergency diesel generators with associated flues each 25 meters above ground level.

These emergency diesel generators will only be used during abnormal operating in the case of emergencies. The emission points from each generator have been labelled Emission Points A3-1 to A3-24 in Attachment-7-4-2. These emission points are shown in DWG-007-Minor and Potential Air Emission included with this application.

Potential Air Emissions

These are emissions which only operate under abnormal process conditions. Typical examples include bursting discs, pressure relief valves, and emergency generators.

There are no potential emissions from the Installation.

Fugitive Air Emissions

Fugitive emissions are defined as low level diffuse emissions, mainly of volatile organic compounds, that occur when either gaseous or liquid process fluids escape from plant equipment. There are no fugitive emissions expected from the Installation.

6.1.1 Treatment, Abatement, Control and Monitoring

The gas engines will be equipped with a Nitrogen Oxides (NOx) Abatement system, Selective Catalytic Reduction (SCR). The SCR abatement works by injecting a reagent (Urea/Ad-Blue) into engine exhaust gas stream, causing a reaction with the NOx, significantly reducing NOx emissions and producing nitrogen and water vapor.

The stack heights of the emergency diesel generators have been designed to ensure that an adequate height was selected to aid dispersion of the emissions and achieve compliance with these ambient air quality standards at all off-site locations (including background concentrations).

Air dispersion modelling has been undertaken as discussed in Attachment 7-1-3-2 (Air

Emissions Impact Assessment) to ensure that the appropriate ambient air quality standards are met. The modelling has been undertaken using the AERMOD air dispersion model in line with EPA Guidance Note AG4.

Periodic measurements of emissions from the gas plant shall be required for CO and NO_x at least every three years for medium combustion plants with a rated thermal input equal to or greater than 1 MW and less than or equal to 20 MW.

Periodic measurements of emissions from the emergency diesel generators shall be required for CO and NO_x at least every five years for medium combustion plants with a rated thermal input equal to or greater than 1 MW and less than or equal to 20 MW.

No further control measures are required for emissions.

6.2 EMISSIONS TO SEWER (WASTEWATER EMISSIONS)

There are no wastewater emissions to foul sewer other than domestic wastewater from welfare facilities. The discharge will enter the private off site foul sewer at emission point SE1. The wastewater emissions ultimately discharge to Ringsend Wastewater Treatment Plant (WWTP). The emission / offsite discharge point is labelled SE1 on DWG- 005 Drainage Plan-Foul included with the application.

6.2.1 Treatment, Abatement, Control and Monitoring

There is no requirement for onsite treatment or abatement for foul effluent produced from the facility as it is from domestic origin only. Wastewater will be treated offsite at the Ringsend WWTP.

6.3 STORMWATER EMISSIONS

The surface water, rainwater from building roofs, yards and the road network, will be discharged to the stormwater network located to the east of the site, Emission Point SW1, the stormwater emission point is shown in DWG-004-Drainage Plan-Surface Water. This is a new facility, and foul wastewater is separated from all stormwater lines in accordance with BAT.

The Installation contains storage tanks for diesel fuel, urea solution, and lubricating oils, posing a potential risk of contaminating stormwater during rainfall events. The site layout and infrastructure include impervious surfaces, such as concrete and asphalt, which can contribute to increased stormwater runoff. There is a low risk of contamination of stormwater, this would only be from complete containment failure resulting in a major leak or spill or emergency situation such as fire.

The emission / offsite discharge point is labelled SW1 on DWG-004-Drainage Plan-Surface Water included with the application.

6.3.1 Treatment, Abatement, Control and Monitoring

The facility will implement a comprehensive containment strategy for all storage tanks, loading/unloading areas, and fuelling stations. Secondary containment structures, such as double skinned diesel belly tanks for the emergency standby generators, and containment within each cell of the Energy Centre, will be in place to prevent spillage and leakage from reaching stormwater drainage systems.

Class 1 interceptors designed to separate and retain hydrocarbons, such as diesel fuel and lubricating oils, from the stormwater runoff are proposed. The interceptor is equipped with an automatic closure mechanism that activates when the hydrocarbon layer reaches a certain level, when this happens oil level warning and alarm systems activate. This closure prevents the hydrocarbons from being released back into the stormwater flow.

There is no further requirement for abatement of the stormwater from the site.

6.4 NOISE EMISSIONS

In the operational context of the facility, various sources contribute to outward noise emissions. The primary source of noise is expected to arise building services noise, energy centre plant noise, emergency site operations and additional vehicular traffic on public roads.

6.4.1 Treatment, Abatement, Control and Monitoring

To ensure compliance with environmental regulations and best practices, a comprehensive assessment of the noise emission impacts has been conducted. This assessment aligns with the guidelines outlined in the Environmental Protection Agency (EPA) Guidance Note for Noise: Licence Applications, Surveys, and Assessments in Relation to Scheduled Activities (NG4).

Plant items have been selected in order to achieve the required noise levels in order that the plant noise emission levels are achieved on site during operations. The ultimate goal of these noise abatement measures is to ensure that the plant's noise levels comply with *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)*. It is expected that the combination of acoustic containers, acoustic louvres, and low noise equipment will be sufficient to maintain noise levels below the stipulated limits at the nearest noise-sensitive receptors, such as residential areas or other noise-sensitive locations near the plant.

Annual day time, evening and night-time monitoring will be undertaken in accordance with the IE licence requirements.

7.0 MANAGEMENT AND PROCESS CONTROL SYSTEMS

7.1 ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

An Environmental Management System (EMS) will be developed for the site in accordance with the requirements of BAT. The EMS will outline the management of the site's environmental program and, although not certified by ISO, will be in line with the principals of ISO14001.

7.2 BUILDING MANAGEMENT SYSTEM (BMS)

Once the facility is constructed, it will incorporate a highly advanced Building Management System (BMS). This sophisticated automation system will be responsible for controlling, monitoring, collecting data, and reporting on all aspects of the site's processes and conditions, encompassing both electrical and mechanical systems.

The BMS will play a pivotal role in overseeing and regulating the engineering systems and services. The BMS will individually manage and monitor each item of services plant or system. This design ensures that each plant or system can operate independently in case of a network failure, guaranteeing continuous functionality.

7.3 STANDARD OPERATING PROCEDURES

A comprehensive Site Health Safety, Environment and Energy Manual will be developed for the site set of Standard Operating Procedures (SOPs) will be formulated and implemented before the facility's operational phase. These SOPs cover a wide range of critical operational processes and environmental considerations onsite, ensuring a safe and efficient working environment. The following key areas are addressed in the SOPs, but are not limited to:

- Emergency Response Procedure;
- Accident Prevention Plan;
- Preventative Maintenance Schedule;
- Training and Competency Programme;
- Hazardous Materials Handling; and
- Incident Management Programme

Regular review and updates to the SOPs will be undertaken necessary to keep them current and aligned with best practices and regulatory standards.

7.4 PREVENTATIVE MAINTENANCE

The Preventative Maintenance (PM) is crucial to ensure the reliable and efficient operation of critical infrastructure. It helps identify and address potential issues before they turn into major problems, minimizing downtime and costly repairs. The specific details of the PM program will be implemented depending on the size, complexity, and criticality of the equipment, and manufacturer's recommendations, industry best practices.

7.5 WASTE MANAGEMENT

Waste Management Standard Operating Procedures (SOPs) are in place for the operation of the data storage facilities. This will ensure the proper management and recycling of wastes generated at the facilities. The waste SOPs will enable the Installation to contribute to the targets and policies outlined in the *Eastern-Midlands Region Waste Management Plan 2015-2021*.

7.6 ENERGY MANAGEMENT SYSTEM (ENMS)

Energy management forms an integral part of the installation's management. Measures are in place to minimise energy use as far as possible.

The applicant recognises that the consumption of electricity is a significant use of energy in our data centres and offices. This site will operate in compliance with the corporate Energy Policy and the requirements of the Energy Management System (EnMS). The applicant is constantly seeking ways in which to improve our energy performance and the efficiency of our equipment, premises and facilities. A EnMS track the operation of critical sub-units and report back on energy efficiency of each section.

Energy monitoring of electricity and gas consumption will be undertaken at each location and reported to the EPA in Annual Environmental Reports.

7.7 FIRE MANAGEMENT

A system is provided for detection, alarm and fire suppression to enhance life safety and protection of property by the detection of fire, enabling an audio/visual alarm to be given such that emergency actions may be taken fully compliant with Irish and EU regulations and in accordance with the insurers' requirements. To ensure the effectiveness of the Fire Alarm system at this location the component parts will be tested and verified on a regular basis. Records of all tests, faults and remedial actions will be maintained and stored.

7.8 PREVENTION OF ACCIDENTS; ERP AND APP

The only substance stored on site controlled under Seveso/ Control of Major Accident Hazards (COMAH) will be diesel for the emergency generators. The quantity of diesel which qualifies a given establishment for the application of lower-tier and upper-tier requirements under Directive 2012/18/EU is 2,500t and 25,000t respectively. The volume of diesel stored on site does not exceed the relevant thresholds of the Seveso Directive 2012/18/EU.

The operation of any activity, regardless of potential major accident hazards, carries inherent risks to the environment and human health. The primary risks associated with the installation include the possibility of accidents or hazardous emergencies arising from on-site activities, potential fire incidents resulting from stored fuel quantities leading to air, water, or soil emissions, on-site spillages or leaks due to accidents, diesel spillages during delivery and unloading, potential failure of the hydro-brake on the attenuation pond or hydrocarbon interceptors causing discharge of contaminated water, and the risk of plant malfunction leading to diesel spills or emissions to air.

To minimise these risks and ensure effective accident prevention and control, various measures have been implemented at the installation as set out in the Operational Reprot (Attachment-4-8-1). By implementing these preventative and control measures, the installation aims to reduce the likelihood of accidents and mitigate the potential consequences of any accidents that may occur on-site, enhancing overall safety and environmental protection.

8.0 CESSATION OF ACTIVITY

8.1 SITE CLOSURE

Upon cessation of operations and subsequent decommissioning of the installation, it is anticipated that there will be no remaining environmental liabilities, i.e. clean closure is expected. Environmental monitoring will be conducted upon agreement and request of the Agency. Once operations cease and site is decommissioned, there will be no significant emissions to atmosphere at the installation so monitoring of emissions will not be required. A site Closure Plan is described in Attachment 9-2-3 of this Licence Application.

8.2 BASELINE REPORT

A complete Baseline Report for the site has been produced and included in Attachment 4-8-3 Complete Baseline Report. The baseline report provides conditions of the site prior as it existed prior to the construction and operation of the facility.

9.0 ENVIRONMENTAL IMPACT ASSESSMENT

9.1.1 Assessment of the Project Against Schedule 5

Ireland's list of Projects for which an EIA is required are set out in Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001 as amended. This list was developed from Annex I and Annex II of the EIA Directive. The proposed activity is not directly listed under Annex I of the EIA Directive, or Part 1, Schedule 5, or Part 2, Schedule 5.

It is considered that most relevant development class in the context of the proposed Project under Part 2, Schedule 5 is Class 10(b)(iv):

10(b)(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

The Installation is 'urban development...elsewhere' in which the threshold is based on an area of 20 ha. The total site area is c. c. 22.1 hectares, therefore exceeds the limit, quantity or threshold set out in Part 2, Schedule 5 is Class 10(b)(iv).

9.1.2 Environmental Impact Assessment Report

An Environmental Impact Assessment Report (EIAR) relating to EDCDUB04 and the GIS Substation was prepared by Marston Planning Consultancy et. al. dated January 2019 and was previously submitted to SDCC Reg. Ref. SD19A/0042/ABP-305948-19 (Attachment 6-3-7 EIAR Planning January 2019 of the IE Licence application).

An Environmental Impact Assessment Report (EIAR) relating to EDCDUB05 and ESSDUB97 was prepared by Marston Planning Consultancy et. al. dated February 2021 and was previously submitted to SDCC Reg. Ref. SD21A/0042/ABP-312749-22 (Attachment 6-3-8 EIAR Planning February 2021 of the IE Licence application).

Of note a separate Strategic Infrastructure Development (SID) application (ABP Reg. Ref.: ABP-314567-22) for a Underground 110kV transmission line connections between the permitted Kishoge 110kV GIS substation (which is located within the licence boundary) and the permitted Aungierstown - Castlebaggot underground 110kV transmission line is currently under consideration by ABP. This application was submitted with an Environmental Impact Assessment Report prepared by AWN et al. dated August 2022 (Attachment 6-3-9 EIAR Planning August 2022 of the IE Licence application).