

TECHNICAL AMENDMENT MEMO

TO:	Pat Byrne, Director
FROM:	Dan Mullins, Inspector, Industrial Control and Environmental Regulation Programme, Office of Environmental Sustainability
DATE:	20 November 2025
RE:	Request for Technical Amendment to Industrial Emissions Licence.
LICENSEE:	Runways Information Services Limited
REGISTER NUMBER:	P1192-01
LOCATION:	Slí Na Cháirde, Portan, Clonee, County Meath.
RECEIVED ON:	01 August 2025
REQUEST REFERENCE NUMBER:	CR12871
RECOMMENDATION:	Accommodate

1. Licenced Activity

Runways Information Services Limited (hereafter referred to as RISL) was granted a licence, Reg. No. P1192-01, on 03 October 2023 for an installation located at Slí Na Cháirde, Portan, Clonee, County Meath. The installation is licenced under Class 2.1¹ of the First Schedule to the Environmental Protection Agency Act 1992 as amended (hereafter referred to as EPA Act).

The installation is licensed for the operation of 90 no. on-site diesel generators as part of a data storage campus, consisting of five data storage installations (Buildings CLN1, CLN2, CLN3, CLN5, and CLN6). Each data storage installation consists of a data hall that houses IT hardware, which host, manage and distribute electronic data.

2. Technical Amendment Request

The request for a Technical Amendment (or, hereafter, TA) of Licence Reg. No. P1192-01 is to allow for an increase in emissions to sewer at emission point SE1 and a new annual average daily volumetric limit on emission point SE2 in the licence. The licensee states this technical amendment is required due to a change in the quality of incoming water to the site, provided by Uisce Éireann (hereafter UÉ), which differs in quality from water tested during the design stage of the installation. The differing water quality intake will require more frequent discharges of cooling water associated with the evaporative cooling system to sewer at emission points SE1 and SE2. The change is also requested to accommodate the controlled flow of waste water from the installation to the UÉ sewer network in

¹ The combustion of fuels in installations with a total rated thermal input of 50MW or more.

circumstances where UÉ require waste water to be retained on-site at RISL for a period of time in a new attenuation tank in order to protect their public sewer network. The permissible discharge flow rate over the subsequent 48 hours after such an event will provide for a higher flow rate from the installation at SE1 to accommodate the additional discharge volume but with the overall mass loading (Kg/day) for any concentration parameter remaining the same as permitted in the existing licence.

The licensee requests to increase the maximum hourly and daily volumetric discharge rates at SE1 and amend the flow rate at SE2 in line with the UÉ consent.

In support of this request, the licensee has submitted a report detailing the background and need for this amendment to its licence, a letter from UÉ approving the increased discharge and an Appropriate Assessment (hereafter AA) screening document.

3. Consultation with the Office of Environmental Enforcement (OEE)

I have consulted with the OEE Inspector, Deborah Foy, in relation to this TA request. The OEE confirmed that the proposed amendment cannot be accommodated under the existing licence. The OEE has confirmed that there are no legal proceedings in train in respect of this licence.

The OEE raised a minor incident no. INCI030831 against the licensee on 29/07/2025 stating that integrity testing of an attenuation tank on-site was undertaken and confirmed defects in its structure that will require further works. OEE have stated that evidence was submitted confirming this work has been completed. This incident was closed on the 29/09/2025. The attenuation tank forms part of the discharge consent authorised by UÉ.

4. Assessment

The Agency's licensing guidance² confirms that a change to an emission to sewer may be accommodated by technical amendment subject to the proposed changes being granted approval by UÉ. The application includes a consent agreement from UÉ (the owner of the sewer network) confirming approval for the change as requested by the licensee.

The requested change represents a doubling of the maximum permitted volumetric flow of waste water from the installation at SE1 from 55m³ to 114m³ per hour and 1,296m³ to 2,726m³ per day. The consent from UÉ also sets a new annual average daily volumetric flow limit of 1,195m³ per day at emission point SE1. There is no change proposed to the volumetric flow rate at SE2 of 1,348 m³ per day but the UÉ consent requires a new reduced average annual daily volumetric flow limit of 500m³ per day at the emission point.

The licensee does not propose to increase the concentrations or the average daily loading (kg/day) of any emission parameter to the sewer network. Therefore, the existing concentration and daily mass emissions (kg/day) from the installation to the sewer network as assessed and provided for in the existing licence P1192-01 will remain the same as a result of the amendment request.

The proposed change will not represent a substantial change in the hydraulic loading to the sewer network in the context of the volume and buffering capacity provided in the Ringsend municipal waste water treatment plant (MWWTP) (discharge licence No. D0034-02). The increase in the maximum daily volumetric discharge to 2,726m³ will represent 0.55% of the average daily hydraulic intake capacity of the receiving treatment plant. The level of treatment of the waste water from RISL at the Ringsend MWWTP will remain equivalent to BAT.

Based on the above, it is recommended to accommodate this amendment request.

Section 96(1) of the EPA Act:

Section 96(1) of the EPA Act states that

² Guidance on Requests for Alterations to a Licensed Industrial or Waste Activity, available at:

<https://www.epa.ie/publications/licensing--permitting/industrial/ied/Licence-Alteration-Guidance-rev-MOC-21-06-19.pdf>.

“The Agency may amend a licence or revised licence for the purposes of -

- a) correcting any clerical error therein,
- b) facilitating the doing of anything pursuant to a condition attached to the licence where the doing of that thing may reasonably be regarded as having been contemplated by the terms of the condition or the terms of the licence taken as a whole but which was not expressly provided for in the condition, or
- c) otherwise facilitating the operation of the licence and the making of the amendment does not result in the relevant requirements of section 83(5) ceasing to be satisfied”.

It is considered that the proposed amendment request may be accommodated under section 96(1)(c). To amend the licence under this criterion, two parts need to be satisfied, Part (i) otherwise facilitating the operation of the licence and Part (ii) does not result in the relevant requirements of section 83(5) ceasing to be satisfied. As detailed in the assessment above, the change proposed is considered as otherwise facilitating the operation of the licence and will not result in the relevant requirements of section 83(5) ceasing to be satisfied.

Based on the above assessment, it is concluded that the changes to the licence, as detailed above, can be accommodated by Technical Amendment. It is considered that the proposed revisions are in accordance with Agency guidelines for licence amendments and the proposed amendments³ will satisfy the criteria under section 96(1)(c) of the EPA Act allowing the Agency to amend a licence or revised licence.

5. Appropriate Assessment

Appendix 1 lists the European Sites assessed, their associated qualifying interests and conservation objectives.

A screening for Appropriate Assessment was undertaken to assess, in view of best scientific knowledge and the conservation objectives of the site, if the activity, individually or in combination with other plans or projects is likely to have a significant effect on any European Site. In this context, particular attention was paid to the European Site(s) at Rye Water Valley/Carton SAC (001398), Dublin Bay South SAC (000210), North Dublin Bay SAC (000206), South Dublin Bay and River Tolka Estuary SPA (004024), North Bull Island SPA (004006) and North-west Irish Sea SPA (004236).

The activity is not directly connected with or necessary to the management of any European Site and the Agency considered, for the reasons set out below, that it can be excluded, on the basis of objective information, that the activity/activities, individually or in combination with other plans or projects, will have a significant effect on any European Site and accordingly determined that an Appropriate Assessment of the activity was not required.

The determination has been made in light of the following reasons:

- the installation is not located within a European Site;
- the recommended change is to the maximum permissible volumetric flow of waste water from the installation to the public sewer network, where it undergoes treatment by Uisce Éireann at the EPA licensed Ringsend Waste Water Treatment Plant (WWTP) (licence reg. no. D0034-02); and
- taking into account the nature of the change in permitted discharges to sewer from the installation, the capacity of the receiving Ringsend WWTP and the nature of the receiving environment, the recommended changes will not have an impact on any European Sites.

6. Recommendation

This memo recommends that the requested changes can be accommodated by a Technical Amendment of Licence P1192-01 (held by Runways Information Services Limited), in accordance with section 96(1)(c) of the EPA Act 1992 as amended.

³ Guidance for Licensee on Request for Alterations to a Licensed Industrial or Waste Activity (EPA, June 2019).

The specific changes in the Recommended Amendment relate to the following conditions and schedules of the licence:

- Schedule B.3 Emissions to Sewer

I recommend that the licence amendment be approved as set out in the attached Recommended Amendment. The making of the amendment will not result in the relevant requirements of section 83(5) of the EPA Act 1992 as amended, ceasing to be satisfied.

Signed,



Dan Mullins
Inspector
Industrial Control and Environmental Regulation Programme
Office of Environmental Sustainability

Appendix 1: List of European Sites assessed, their associated qualifying interests and conservation objectives.

Site Code	Site Name	Qualifying Interests (* denotes priority habitat)	Conservation Objectives
001398	Rye Water Valley/Carton SAC	Habitats 7220 Petrifying springs with tufa formation (Cratoneurion)* Species 1014 Narrow-mouthed Whorl Snail (<i>Vertigo angustior</i>) 1016 Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>)	NPWS (2021) Conservation Objectives: Rye Water Valley/Carton SAC 001398. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.
000210	South Dublin Bay SAC	Habitats 1140 Mudflats and sandflats not covered by seawater at low tide 1210 Annual vegetation of drift lines 1310 Salicornia and other annuals colonising mud and sand 2110 Embryonic shifting dunes	NPWS (2013) Conservation Objectives: South Dublin Bay SAC 000210. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
000206	North Dublin Bay SAC	Habitats 1140 Mudflats and sandflats not covered by seawater at low tide 1210 Annual vegetation of drift lines 1310 Salicornia and other annuals colonising mud and sand 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) 1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>) 2110 Embryonic shifting dunes 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* 2190 Humid dune slacks Species 1395 Petalwort (<i>Petalophyllum ralfsii</i>)	NPWS (2013) Conservation Objectives: North Dublin Bay SAC 000206. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
004024	South Dublin Bay and River Tolka Estuary SPA	Birds A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) A130 Oystercatcher (<i>Haematopus ostralegus</i>) A137 Ringed Plover (<i>Charadrius hiaticula</i>) A141 Grey Plover (<i>Pluvialis squatarola</i>) A143 Knot (<i>Calidris canutus</i>) A144 Sanderling (<i>Calidris alba</i>) A149 Dunlin (<i>Calidris alpina</i>)	NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

Site Code	Site Name	Qualifying Interests (* denotes priority habitat)	Conservation Objectives
		A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) A162 Redshank (<i>Tringa totanus</i>) A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) A192 Roseate Tern (<i>Sterna dougallii</i>) A193 Common Tern (<i>Sterna hirundo</i>) A194 Arctic Tern (<i>Sterna paradisaea</i>) Habitats Wetland and Waterbirds (A999)	
004006	North Bull Island SPA	Birds A046 Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) A048 Shelduck (<i>Tadorna tadorna</i>) A052 Teal (<i>Anas crecca</i>) A054 Pintail (<i>Anas acuta</i>) A056 Shoveler (<i>Anas clypeata</i>) A130 Oystercatcher (<i>Haematopus ostralegus</i>) A140 Golden Plover (<i>Pluvialis apricaria</i>) A141 Grey Plover (<i>Pluvialis squatarola</i>) A143 Knot (<i>Calidris canutus</i>) A144 Sanderling (<i>Calidris alba</i>) A149 Dunlin (<i>Calidris alpina</i>) A156 Black-tailed Godwit (<i>Limosa limosa</i>) A157 Bar-tailed Godwit (<i>Limosa lapponica</i>) A160 Curlew (<i>Numenius arquata</i>) A162 Redshank (<i>Tringa totanus</i>) A169 Turnstone (<i>Arenaria interpres</i>) A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) Habitats Wetland and Waterbirds (A999)	NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.
004236	North-west Irish Sea SPA	Birds A001 Red-throated Diver (<i>Gavia stellata</i>) A003 Great Northern Diver (<i>Gavia immer</i>) A009 Fulmar (<i>Fulmarus glacialis</i>) A013 Manx Shearwater (<i>Puffinus puffinus</i>) A017 Cormorant (<i>Phalacrocorax carbo</i>)	NPWS (2023) Conservation Objectives: North-west Irish Sea SPA 004236. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Site Code	Site Name	Qualifying Interests (* denotes priority habitat)	Conservation Objectives
		A018 Shag (<i>Phalacrocorax aristotelis</i>) A065 Common Scoter (<i>Melanitta nigra</i>) A862 Little Gull (<i>Larus minutus</i>) A179 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) A182 Common Gull (<i>Larus canus</i>) A183 Lesser Black-backed Gull (<i>Larus fuscus</i>) A184 Herring Gull (<i>Larus argentatus</i>) A187 Great Black-backed Gull (<i>Larus marinus</i>) A188 Kittiwake (<i>Rissa tridactyla</i>) A192 Roseate Tern (<i>Sterna dougallii</i>) A193 Common Tern (<i>Sterna hirundo</i>) A194 Arctic Tern (<i>Sterna paradisaea</i>) A885 Little Tern (<i>Sterna albifrons</i>) A199 Guillemot (<i>Uria aalge</i>) A200 Razorbill (<i>Alca torda</i>) A204 Puffin (<i>Fratercula arctica</i>)	