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On behalf of Sdc-En Meath I Limited

05 October 2026

Reg. No.: P1239-01

Regulation 10(2)(b)(ii) of the EPA (Industrial Emissions) (Licensing) Regulations 2013, in respect of a licence application from Sdc-En Meath I Limited for an installation located at Bracetown & Gunnocks, to the North of Clonee, Bracetown, Co. Meath.

Dear Sir or Madam,

I refer to the application for a licence received by the EPA on 29 June 2026.

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.

## **REGULATION 9 COMPLIANCE REQUIREMENTS**

### **Air Emissions Impact Assessment (Attachment 7.1.3.2)**

1. It is noted that the installation is located within Zone D and the monitoring stations located within Zone D were selected in determining background concentrations for a number of pollutants. However the selected monitoring stations are a considerable distance from the installation and are not considered to be representative of the site location. Update the air dispersion modelling to ensure that background concentrations, which are representative of the site of the installation, are considered.
2. Given the location of the installation and the surrounding environs, the total number of back-up generators to be installed and the hours of operation requested in the licence application, demonstrate that the BAT associated emission levels (BAT-AELs) and monitoring requirements, as per LCP CID 2021/2326/EU, can be achieved by **all**<sup>1</sup> generators in Phase 1, Phase 2 and Phase 3.

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<sup>1</sup> A2-19 to A2-36, A2-55 to A2-27, A3-1 to A3-18 and A3-37 to A3-54.

### Noise Impact Assessment (Attachment 7.1.3.2)

3. It is noted in the Noise Impact Assessment (Attachment 7.1.3.2) that a noise level of 55dB for evening and night time has been applied to Scenario B for Phase 1, Phase 2 and Phase 3 with reference made to Section 4.4.1 of **Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)**. Given continuous operation of back-up generators has been requested as part of the licence application it is considered that the standard noise limit values are applied for this scenario. Update the noise impact assessment to ensure the standard noise limit values are applied for Scenario B for Phase 1, Phase 2 and Phase 3.

### Climate

4. For each Phase considered as part of this application and based on each fuel types and usage as provided in Attachment 4.6.1 Waste and Energy Usage, complete the table below in relation to the approximate quantity of CO<sub>2</sub>-eq emissions to be released from the installation.

| Phase   | Fuel Type <sup>2</sup> | Future fuel usage per calendar year if authorisation is granted (tonnes) <sup>3</sup> | Tonnes CO <sub>2</sub> -eq per annum <sup>4</sup> | Total calculated GHG emissions |
|---------|------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------|--------------------------------|
| Phase 1 |                        |                                                                                       |                                                   |                                |
| Phase 2 |                        |                                                                                       |                                                   |                                |
| Phase 3 |                        |                                                                                       |                                                   |                                |

\*add rows to the table as necessary

5. Describe the mitigation measures to reduce and/or eliminate the potential impacts of the installation on climate such as; Greenhouse Gas (GHG) permit, use of BAT / energy efficient design, use of renewable energy and/or zero-rated fuel (e.g. Hydrotreated Vegetable Oil), corporate power purchase agreement, private wires, and/or any other mitigation measures.
6. Describe how the installation will operate in a manner consistent with the following plans, strategies and objectives:
- the most recently approved climate action plan.
  - the most recently approved national long term climate action strategy.
  - the most recently approved national adaptation framework and sectoral adaptation plans<sup>5</sup>.
  - furtherance of the national climate objective.

<sup>2</sup> Ensure the fuel type(s) aligns to the information provided in Attachment 4.6.1 Waste and Energy Usage.

<sup>3</sup> Ensure the fuel usage aligns to the information provided in Attachment 4.6.1 Waste and Energy Usage.

<sup>4</sup> Ensure calculation is in accordance with the *Commission Implementing Regulation (EU) 2018/ 2066 - of 19 December 2018 - on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/ 87/ EC of the European Parliament and of the Council and amending Commission Regulation (EU) No 601 / 2012, as amended.*

<sup>5</sup> Describe how the installation/ facility is in accordance with the relevant City/ County Council Development Plan(s) and associated Climate Action Plan(s).

- e. the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

### **National Electricity Grid Connection / Offer**

7. Does the installation have an electricity grid connection or offer in place? (Yes/No):  
If 'Yes' confirm and describe the type of grid connection or offer (e.g. firm/ flexible demand/ hybrid)
8. For each Phase, what is the maximum amount of electricity (MW) that will be supplied by the national electricity grid?
9. For each Phase, what is the minimum amount of electricity (MW) that may be supplied by the national electricity grid?
10. If there is a short fall between supply from the national electricity grid and demand of the installation, describe how this short fall will be addressed for both normal operating conditions and worst- case operating conditions<sup>6</sup>

In addition to the above, please also provide an updated non-technical summary (Application Form, and EIS 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 **10 weeks** 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](mailto: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 applicant 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

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<sup>6</sup> Where multiple electricity sources are proposed, provide the amount of electricity (MW) to be supplied from each source.

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](mailto:licensing@epa.ie).

Yours Sincerely,

Naoimh O'Regan

Industrial Control and Environmental Regulation Programme

Office of Environmental Sustainability

Tel: 053 – 9160600