



Mr Daniel Kirk
Senior Permitting Officer
Permitting & Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Tuesday 2nd April 2019

Application Reference: **EPR/PP3003PW/A001**

Dear Daniel,

Please find noted below the additional information requested and our formal response to the Not Duly Made Letter issued on 19th March 2019 in relation to our IED permit application for Spring Park.

Request

1. You have confirmed in Form B2 section 4a that you have a trade effluent consent, Please complete Form B3 section 2 Table 2 Point source emissions to sewer.

Response

Please see section 7 of Appendix 3 which describes the nature of our process effluent along with the drawings and trade effluent consent presented in Appendices 23 and 24. You will note in appendix 24 that Ark and Wessex Water have agreed the devestment of part of the foul drainage network on the Spring Park Campus. The current trade Effluent agreement will be moved to coincide with the new service boundary shown in the Devestment Agreement and on the foul drainage plan.

We believe that this information provides the data requested in form B3 section 2 Table 2, however we are unsure how to reflect this in the form itself.

Request

2. B3 section 3 Table 3a technical standards – Please list the guidance and standards to which the site’s operational procedures will comply.

Response

The Technical Note “Introduction to Data Supporting IED Application EPR/DP3731YL/A001” presented as Appendix 3 has been prepared in response to the Datacentre FAQ Headline approach (draft version 6.0 H Tee 10/5/17) which has been provided as a guidance to the data centre sector, for completing the permit application. The guidance and standards to which the site’s operational procedures will comply are provided in this technical note.



Request

3. Review the requirements of the Industrial Emissions Directive to determine which chapter is appropriate for this facility and confirm the correct chapter that applies.

Response

Following a review, we can confirm that Spring Park falls under chapter 2 rather than chapter 3. We have amended our application form accordingly which is now enclosed as "version 3".

Request

4. Form B2 section 3d - you have supplied certification for your management system but not provided a summary of the content. Please send us a summary of your management system.

Response

Additional information that outlines our certifications, the associated Management Systems and their interactions are outline in Section 10 of Appendix 3.

Request

5. The numbers of engines applied for and assessed must be clearly stated and consistent throughout the application. Please review your documents and ensure that the number of engines applied for is consistently stated and all of your assessments account for this number of engines.

Response

All forms and supporting document have been reviewed and where appropriate updated to reflect this application is for 33 generators.

Request

6. The site plan must be consistent with the application supporting documents. Please resubmit a revised site plan annotating all emissions points and the location of all engines applied for under this application.

Response

The master plan attached as Appendix 7 shows the locations of all 33 generators that form part of this application. The facility plans in Appendix 8 provide the individual source points for the generators as used in our CCA and EU ETS agreements.

Request

7. The noise assessment only covers engines serving building P3 and P4. Please submit a revised noise assessment which includes all the engines applied for under this application and any associated infrastructure which has the potential to produce significant noise emissions.

Response

We apologise for this oversight on our initial application. A revised noise assessment has been carried out and the revised technical report is included as Appendix 22.

Ark Data Centres Limited

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Request

8. Noise and Vibration Management Plan. You have identified noise as a risk and have undertaken an acoustic assessment – Please submit a noise management plan for the site.

Response

The conclusions of the Acoustic Technical Report (Appendix 22) indicates that normal operations, at full load, are not expected to have an adverse noise impact at the nearest and most exposed noise-sensitive receptors. The assessment has also indicated that in the extremely unlikely event of a coincident mains power failure and an emergency cooling event the “emergency operations” will not produce a significant adverse noise effect at the nearest noise sensitive receptors.

On this basis Ark do not have a formal noise and vibration plan.

Request

9. The charge for our assessment of your plan is not included in your baseline application charge. You will therefore need to make an additional payment of £1,246.

Response

Payment for £1,246 was made to the EA on the 19/3/19 as per the attached remittance note. However, following the response to point 8 above, can you please advise if this payment is still necessary as there is no noise and vibration management plan to review?

Request

10. Your application requires an assessment under the Habitats Regulations. The charge for this assessment is not included in your baseline application charge. You will therefore need to make an additional payment of £779.

Response

Payment for £779 was made to the EA on the 19/3/19 as per the attached remittance note.

Request

11. The following documents are stated to be commercial in confidence:

- Appendix 10 - 6001-D-Ark Spring Park Energy and Emissions Management Plan
- Appendix 3 - Spring Park Data Centres: Introduction to Data Supporting IED
- Application EPR/DP3731YL/A001 – Technical Note

a) Please confirm whether or not these documents are commercially confidential.

b) In the event these documents are commercially confidential, please confirm this in Application form Part F, Section 4 and provide justification for not including the information in the public register.

Response

We have reviewed the documents listed above and have concluded that they are not commercially confidential and can be included in the public register.

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Request

12. You are required to propose emission limits to which the site will comply. Please state the emissions limits you intend to comply with and provide justification for them in line with appropriate guidance, standards and annual operating hours.

Response

As per the Datacentre FAQ document bullet point 6, this permit will have a maximum 500 hour emergency/standby operational limit and therefore emission limit values to air are not required within the permit.

Request

13. You are required to outline your emissions monitoring procedures and frequencies. Please outline your emissions monitoring procedures and frequency and provide justification for this in line with appropriate guidance and standards.

Response

Bullet point 8 from the Data Centre FAQ Headline Approach, version 6 states: "Each individual generator with its own discharge stack, can be maintained, tested and used in a planned way for up to 500 hours per calendar year without Emission Limit Values (ELVs) and hence no monitoring under IED/MCPD". In section 1.4.2 of the same document the guidance goes on to say "The EA is content to use the engine management logging schemes provided by the engines/systems supplier as the run hours on each machine over the year. Once permitted a data centre practically need only really report each engine's run hours annually and notify us of powering the site for prolonged periods using more than the predetermined number of engines".

Appendix 10, the Ark Spring Park Energy and Emissions Management Plan describes the methodology used to monitor and report generator run times as agreed with the EA under the EU-ETS scheme. We propose to use the same methodology for the IED permit.

Request

14. As part of an installation permit application you are required to demonstrate 'Best available techniques' (BAT). This means the available techniques which are the best for preventing or minimising emissions and impacts on the environment. Techniques include both the technology used and the way your installation is designed, built, maintained, operated and decommissioned.

Please demonstrate why each of the following aspects of your proposal represent Best Available Techniques (BAT). This must include a description, BAT justification for the chosen approach and reference to relevant guidance.

- a) Primary and secondary air emissions abatement techniques
- b) Engine technology choice
- c) Fuel storage infrastructure, containment and drainage
- d) How your proposals compare to relevant aspects of the BAT conclusions
- e) Size of the unit used (MWth)
- f) Fuel Type
- g) Operating durations

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Response

All relevant BAT information can be found in the revised version of Appendix 3, primarily in Section 9.

Request

15. You are required to identify possible accidents which could result in pollution (e.g. fire, power outage, overfilling vessels) and show how you will address these. Please submit an accident management plan

Response

Ark undertakes standard risk management techniques and tools to identify and manage risk throughout of the organisation across all of our activities in accordance with our ISO standards (including Business Continuity and Environmental). These are used instead of an Accident Management Plan. As part of our original application we included in our Standard Operating Procedures (SOP) and Emergency Operating Procedures (EOP) in relation to fuel management. These are summarised in Section 6.2 and 6.3 of Appendix 3 with full details provided in Appendix 21 which we are resubmitting for completeness.

The following documents form part of our response and have been uploaded to the agreed fileshare due to size

- Application Form (EPR - Part B3 Spring Park v3)
- Payment Evidence - (Remittance From Ark Data Centres Limited Form)
- Appendix 3 – Introduction to Data Supporting IED Application EPR/DP3731YL/A001
- Appendix 7 – Spring Park Masterplan
- Appendix 8 – Spring Park Facility Plans
- Appendix 10 – Spring Park Energy and Emissions Management Plan
- Appendix 15 – Installation Overview
- Appendix 20 – Generator Data
- Appendix 21 – Fuel Management
- Appendix 22 – Updated Acoustic Technical Report for the Spring Park Campus
- Appendix 23 – Foul and Surface Water Drainage Plans
- Appendix 24 – Wessex Water Trade Effluent and Devestment Agreements
- Appendix 25 – Air Quality Modelling Assessment

Yours sincerely

A handwritten signature in black ink, appearing to read "Louise Methven".

Louise Methven
Head of Compliance, Ark Data Centres Limited

cc: Ian Perryment, The Company Secretary, Ark Data Centres Limited