

Attachment 1.2 – Non-Technical Summary

DUB20 Industrial Emissions Licence
Application
Crag Digital Avoca Limited



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1 Introduction

Crag Digital Avoca Limited (CDAL) is applying to the Environmental Protection Agency (EPA) for an Industrial Emissions (IE) Licence for the operation of a new installation which will include 3 no. Information and Communication Technology (ICT) facilities. The new installation is planned for construction at a brownfield site located in the Avoca River Park industrial estate, near Arklow, Co. Wicklow. The site is within the administrative area of Wicklow County Council (WCC).

This non-technical summary has been prepared in accordance with the EPA licence application form guidance¹ and contains the following information:

- Section 1 – Introduction
- Section 2 – Licensed Activity and Regulatory Compliance
- Section 3 – Description of Site and Installation
- Section 4 – Material Use and Quantities
- Section 5 – Emissions, Emission Control and Monitoring
- Section 6 – Pollution Prevention Measures
- Section 7 – Impact Assessment
- Section 8 – Compliance
- Section 9 – Risk Management

¹ Licence Application Form Guidance – Industrial Emissions (IE), Integrated Pollution Control (IPC) and Waste (Version 2), EPA, March 2018

2 Licenced Activity and Regulatory Compliance

2.1 Activities to be Licensed

The activity to be licensed, under the First Schedule of the Environmental Protection Agency Acts 1992 to 2011, is Class 2.1:

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

The ICT facility will be supported by a total of 60 no. emergency diesel generators (each with a maximum rated thermal input of 7.6MWth) in the event of a loss of mains power supply. The emergency generators will be operated less than 500 hours per annum and are within the scope of the Medium Combustion Plant Regulations ((S.I. No. 595 of 2017).

No derogation under Section 86A(6) is being sought.

2.2 Planning Permission and Environmental Impact Assessment Report

A grant of planning permission was issued by WCC for the data centre in June of 2023 (WCC Ref 23/72), and was subsequently amended by WCC Ref 25/60806, which received its final grant of planning permission in November 2025. An EIA was submitted in support of the planning application WCC Ref 23/72. The Planners Report for WCC Ref 25/60806 conformed that the amending application did not require an EIAR to be prepared. These attachments are included within Section 6 of this licence application.

2.3 Best Available Techniques

The installation is intended to replicate successful and proven technologies and processes already developed and in use in similar facilities. The design team have assessed Best Available Techniques (BAT) and ensured compliance with the relevant BAT as a minimum requirement. Conclusions on BAT and BAT guidance are issued by the European Commission and the European IPPC Bureau.

No sectoral BAT Conclusions apply (the combustion plant fall below Large Combustion Plant thresholds). The following BAT Reference assessments were completed:

- Reference Document on Best Available Techniques for Energy Efficiency, European IPPC Bureau, February 2009 (Energy Efficiency BREF);
- Reference Document on Best Available Techniques on Emissions from Storage, European IPPC Bureau, July 2006 (Emissions from Storage BREF);
- Reference Document on the Application of Best Available Techniques to Industrial Cooling Systems, European IPPC Bureau, December 2001 (Industrial Cooling Systems BREF).

Please refer to Attachments 4.7.1, 4.7.2, 4.7.3 and 4.7.4 for detailed assessments of compliance with BAT for each of the above listed BAT documents. It is concluded from this assessment that the installation will comply with applicable Best Available Techniques.

2.4 COMAH Regulations

Based on the information available for substances to be stored within the site boundary and associated inventory, the Chemicals Act (Control of Major Accidents Hazards Involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015) do not apply.

2.5 Determination of Emission Levels

Emission levels have been determined based on the following:

- Results of air dispersion modelling to determine emission levels consistent with the achievement of ambient air quality standards.
- Compliance with Medium Combustion Plant Directive and Regulations

Monitoring of emissions will be carried out in accordance with the requirements of the IE licence.

3 Description of Site and Installation

3.1 Site Overview

The site boundary for the proposed licensed activity is shown in detail on the drawings accompanying the licence application. An aerial overview of the site and new installation planned for construction is shown in Figure 3.1.



Figure 3.1: Overview of Site and CDAL Installation

3.2 Environmental Conditions

3.2.1 Soils & Groundwater

The aquifer underlying the site is a Locally Important (LI) aquifer, i.e. an aquifer that is moderately productive only in local zones.

The vulnerability of the aquifer in the region of the site is classified as 'Moderate' by the GSI. Moderate vulnerability indicates that the aquifer has moderate vulnerability to contamination by human activities.

The GSI Well Card Index does not show any drilled wells or springs within the site boundary, but shows a number of drilled boreholes in the vicinity of the site. There are no groundwater source protection zones in the immediate vicinity of the site.

Based on the topography in the region, it is assumed that groundwater flows in a southerly direction towards the Avoca River.

The underlying groundwater body (Wicklow GWB) has achieved 'Good' groundwater status for the purposes of the EU Water Framework Directive (2000/60/EC) in the most recent cycle (2019 – 2024).

A site investigation including sampling and laboratory analysis of soil and groundwater samples was carried out in 2023. The results of the site

investigation showed no evidence of contamination due to current or historic activities.

A Baseline Report has been prepared in accordance with Section 86B of the EPA Acts 1992 to 2011 and is included in Attachment 4.8.3 of the licence application.

3.2.2 Surface Water

There are no surface watercourses within the site. The nearest watercourse is the Avoca River, which is located approximately 30m south of the site at its closest point. The Avoca River forms at a location known as the 'Meeting of the Waters' as it begins where two rivers, the Avonmore and the Avonbeg meet. The river flows southwest for approximately 56km before entering the Irish Sea at Arklow, Co. Wicklow. The Avoca River bounds the installation site to the south for approximately 340m before continuing southeast towards Arklow and the Irish Sea.

3.2.3 Air Quality

The existing air quality environment with reference to environmental quality objectives and standards is described in the EIAR accompanying the licence application (Chapter 8 Air Quality & Climate). A summary of baseline conditions is provided below.

As part of the implementation of the Framework Directive on Air Quality (1996/62/EC), four air quality zones were defined in Ireland for air quality management and assessment purposes. Dublin is defined as Zone A and Cork as Zone B. Zone C is composed of 23 towns with a population of greater than 15,000. The remainder of the country, which represents rural Ireland but also includes all towns with a population of less than 15,000 is defined as Zone D. In terms of air quality monitoring, the site of the installation north of Arklow town is within an area categorised as Zone D (Rural Ireland).

3.2.4 Noise Environment

The main sources of plant noise associated with the operation of the planned new installation are listed below:

- Data centre emergency generators (testing and emergency scenario only);
- Data centre emergency generator exhausts (testing and emergency scenario only);
- House emergency generators;
- Chillers
- Air Handling Units (AHUs);
- Variable Refrigerant Flow (VRF) units.

All plant and equipment onsite may be operated during the day or night given the peaking nature of the plant.

As part of detailed design and procurement, new plant items will be selected in order to achieve the stated noise levels and or appropriate attenuation will be incorporated into the design of the plant/building to ensure that the plant noise emission levels are achieved on site (including any system regenerated noise).

In addition, plant will be selected such that noise emissions are not tonal or impulsive in nature at nearby NSLs.

3.3 Description of the Installation

The purpose of the ICT facility development is to provide secure data storage services, and distribution of information to individuals, businesses and organisations. In order to ensure a continuous supply of electricity to the ICT facility, emergency/back-up diesel generators will be installed.

The ICT facility will comprise 3 no. two storey ICT buildings (Figure 3.1). The main plant will comprise IT equipment housed within data storage rooms, associated mechanical and electrical plant rooms, pump rooms for water storage and plant and 60 no. emergency generators.

The 60 no. emergency generators will be located to the south side of the ICT facility buildings with individual flues that will be max. 22 m in height. Each generator will be supplied by a dedicated belly tank (double skinned) for diesel storage.

3.4 Hours of Operation

Working hours are expected to be 24 hours per day, 7 days per week. Shift patterns for the overall working of the facility will be determined prior to commissioning.

4 Material Use and Quantities

Each generator will be served by a double walled belly tank for liquid fuel storage. The data centre generator belly tanks will have a capacity of 19.5 m³ while the landlord/house generator belly tanks will each have a capacity of 10.5 m³. The emergency generators will be operated using either diesel or Hydrotreated Vegetable Oil (HVO).

4.1 Waste Management

There will be no licensed waste activities within the installation boundary.

The majority of waste generated at the facility will be non-hazardous, including:

- Dry Mixed Recyclables (DMR) - including waste paper and packaging, cardboard, plastic packaging and bottles, aluminium cans, tins and Tetra Pak cartons;
- Organic (food) waste;
- Mixed non-recyclable waste;
- Glass;
- Confidential paper;
- Printer cartridges/toners;
- Green waste from landscaping;
- Batteries (both hazardous and non-hazardous) - both wet and dry batteries;
- Waste electrical and electronic equipment (WEEE) (both hazardous and non-hazardous);
- Metal Waste (i.e. from maintenance/equipment change out);
- Waste lubricating oil;
- Waste sludge from hydrocarbon interceptors;
- Other liquid wastes from general and maintenance chemicals (e.g. pesticides, paints and adhesives, detergents, etc.)

The main source of hazardous waste will comprise waste oils from the hydrocarbon interceptor. Other sources of hazardous waste onsite will include empty chemical containers (e.g. maintenance and cleaning chemicals), lamps, spent printer/toner cartridges and waste electrical and electronic equipment (WEEE).

Further details of the waste expected to be generated as a result of the licensed activity, estimated quantities and the proposed means of offsite waste treatment (disposal/recovery) are set out in Attachment 8.1 of the licence application.

4.1.1 Waste Hierarchy

All waste will be managed in accordance with the waste hierarchy (with further details contained in Attachment 8.2.1 of the licence application).

Prevention

Measures to prevent and minimise waste generation have incorporated into the facility design.

During the operational phase, key measures for the prevention of waste will include the implementation of an Environmental Management System (EMS) and employee training and awareness.

Preparing for Reuse

The main raw material / utility required for the operation of the facility is electricity. As such, the opportunities for reuse of materials onsite and/or preparing for reuse offsite are limited.

Recycling

All waste materials generated onsite will be appropriately segregated with provision of dedicated receptacles for recyclable materials, identification of authorised waste management facilities and waste hauliers for collection and recycling of materials.

Recovery

Where suitable outlets are not available for recycling a given waste stream, the next treatment step will be recovery subject to suitability of the waste in question. It is intended that all waste materials generated will be subject to either a recycling or alternative recovery process with no materials intended for disposal, consistent with the desired aim of *'zero to landfill'*.

Disposal

Disposal of waste will only be carried out as a last and final option, where no alternative treatment outlet is available.

5 Emissions, Emission Control and Monitoring

5.1 Emissions to Atmosphere

5.1.1 Main Emissions

There will be no 'main emissions' associated with the ICT facility. The only source of emissions associated with the ICT facility are dealt with under the following section, 'Minor Emissions'.

5.1.2 Minor Emissions

There will be 60 no. emergency diesel generators within the ICT facility. These emergency generators are identified as minor emission points due to routine testing and load bank testing. The routine testing of the emergency generators will be for limited periods (typically one hour per generator, once per month) and this testing will be limited to daytime hours only.

In accordance with the Medium Combustion Plant Regulations (S.I. No. 595 of 2017), the monitoring of air emissions from the emergency diesel generators is only mandatory when operated for more than 500 hours per year. Industry experience of power outages in the Wicklow area indicates that in any given year the standby generators may operate for 24-48 hours in total, if at all.

5.1.3 Potential Emissions

Potential emissions are limited to the diesel storage tank relief vents. These emissions would only occur during abnormal events, for example over-pressurisation.

5.2 Stormwater Emissions

Rainwater runoff from the building roofs, car parking areas and yard will be collected in stormwater drainage channels and diverted to a final stormwater attenuation pond onsite prior to controlled discharge via a single emission point to the Avoca River Park attenuation pond and Avoca River to the south. The surface water drainage system has been sized to incorporate all developments within the installation boundary.

The stormwater emission will be subject to routine visual inspection in accordance with IE licence requirements.

5.3 Foul Sewer Emission

Emissions to foul sewer will comprise foul effluent from the site toilets, sinks and canteen facilities in addition to cooling water from the ICT facility. Cooling water generation for emission to sewer will be limited to hot summer months only when the cooling system is required to operate in evaporative mode. Outside of such periods, the ICT facility is served by air cooling. The installation will discharge from a single emission point via a new sewer to the exiting public sewer. The receiving public foul sewer ultimately discharges to the municipal Waste Water Treatment Plant (WWTP) in Arklow.

5.4 Emissions to Ground

There will be no emissions to ground as part of the operation of the new installation.

5.5 Noise Emissions

The main sources of noise associated with the operation of the installation will be the building service plant which will be required to service the ICT facility (including the air handling unit air intakes and exhausts) as well as the operation of the diesel generators (in emergency power generation scenario only). It is anticipated that the diesel generators will operate for 24-48 hours in total, if at all in any given year.

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

6 Pollution Prevention Measures

6.1 Minimisation of Emissions to Atmosphere

Exhaust gases from the 60 no. emergency generators (fuelled by diesel or Hydrotreated Vegetable Oil) will be discharged to the atmosphere via individual flues.

The emergency generators qualify as Medium Combustion Plant (MCP) under the Medium Combustion Plant Directive ((EU) 2015/2193). The MCP Directive is transposed in Ireland by the Medium Combustion Plant (MCP) Regulations (S.I No. 595 of 2017).

Emissions from the generators will be limited to testing and emergency scenarios only.

6.2 Minimisation of Noise Emissions

There are no BAT-AELs specified for noise emissions. The Emissions Impact Assessment Report (Attachment 7-1-3-2 of the IE licence application) includes full details of noise emissions associated with the installation. The impact assessment of noise emissions has been informed by baseline noise measurements of the existing environment and noise modelling of the planned new installation.

The predicted noise levels associated with the operation of the installation at the nearest noise sensitive locations (NSLs) will comply with the relevant noise criteria identified for the site in accordance with EPA noise guidance NG4³

6.3 Protection of Soil, Groundwater and Surface Water

There will be no emissions to ground or groundwater as a result of the normal operation of the installation. On completion of the data centre development, all aqueous emissions will be collected in underground surface water and foul water drainage networks for discharge to sewer.

The main storage of fuels and chemicals relates to the two bulk diesel storage tanks. These will be located within a concrete bund which will also contain smaller storage tanks for lubricating oil and urea. The bund will be constructed in accordance with EPA guidance i.e. to provide 110% of the largest tank volume or 25% of the overall volume stored within the bund.

The following additional containment measures are planned to prevent any accidental release of polluting materials from the site:

- Storage tanks will be equipped with alarmed leak (level) detection;
- All rainwater run-off from hard paved areas of the site will pass through an oil interceptor;
- In the event of a fire or other major leak / incident (e.g. during delivery), run-off will drain directly to the onsite attenuation pond which will be equipped with a shut off valve to contain any potentially contaminated material onsite.

6.4 Environmental Management System

An Environmental Management System (EMS) will be developed for the site in accordance with the requirements of BAT and as required by the IE Licence. The EMS will govern the management of the site's environmental programme and will be consistent with best practice requirements (e.g. international standard for environmental management ISO 14001).

7 Impact Assessment

7.1 Reports

This application is accompanied by an Environmental Impact Assessment Report (EIAR), was submitted to WCC previously in support of the planning application for the ICT facility (WCC Ref 23/72). The EIAR contains a cumulative assessment of the ICT facility and the power generation facility.

As required by EPA guidelines for licence applications, an Emissions Impact Assessment Report has also been prepared in support of the current IE licence application (Attachment 7.1.3.2) with summary details in the following sections.

7.2 Air Quality

As described above, there are no main emissions to atmosphere associated with the new installation which meet the thresholds of the Large Combustion Plant (LCP) and the LCP BAT Conclusions do not apply. There are no other relevant BAT Conclusions or BAT-AELs for the installation's emissions to atmosphere.

Exhaust gases from the 60 no. emergency generators (fuelled by diesel or Hydrotreated Vegetable Oil) will be discharged to the atmosphere via individual flues. The emergency generator units each have a rated thermal input in the range of either 3.5 MW_{th} (6 no. generators) or 7.6 MW_{th} (54 no. generators).

The emergency generators qualify as Medium Combustion Plant (MCP) under the Medium Combustion Plant Directive ((EU) 2015/2193). The MCP Directive is transposed in Ireland by the Medium Combustion Plant (MCP) Regulations (S.I No. 595 of 2017).

Industry experience of power outages for data centre operations in Ireland indicates that in any given year, the emergency generators for the ICT facility may operate for 24-48 hours in total, if at all. The emissions impact assessment (Attachment 7-1-3-2 of the IE licence application) has included an assessment of the emergency generator operation for up to 72 hours per year.

The emergency generators are for emergency back-up only and will not be used during normal operations, with the exception of routine testing. The generators will not be operated in excess of 500 hours per annum. Therefore, the standby generators as proposed are exempt from complying with the emission limit values subject to Section 13(3) of the Medium Combustion Plant (MCP) Regulations.

A detailed air emissions impact assessment, including the results of air dispersion modelling for the emergency generator emissions to atmosphere, was completed as part of the EIAR accompanying the licence application (Attachment 6-3-6). An updated Air Emissions Impact Assessment was also included as part of a subsequent planning application (planning ref. 25/60806).

Further details on the air emissions impact assessment for the installation are also reported in the Emissions Impact Assessment Report (Attachment 7-1-3-2) supporting the licence application. The modelling results show that ambient ground level concentrations comply with air quality standards.

In summary, it is noted that there are no BAT Conclusions containing BAT Associated Emission Limits (BAT-AELs) applicable to the emissions to atmosphere from the new installation.

7.3 Emissions to Sewer

7.3.1 Surface Water

The emission of surface water to the external stormwater sewer network will comprise uncontaminated stormwater run-off from building roofs, car parks, internal roads, and/or other hardstanding areas of the site discharging via single emission point to the external surface water sewer network.

Prior to emission to the external sewer network, stormwater flow will be attenuated in the final attenuation pond which is sized to cater for the 1 in 100 year critical storm event plus 20% for climate change. The outfall from the final attenuation pond will be equipped with a non-return valve, hydrobrake, and penstock. Flow from the final attenuation pond will be limited to greenfield rate via the hydrobrake flow control device. Prior to discharge offsite, all stormwater from the final attenuation pond will pass through a hydrocarbon interceptor.

In the event of a spill or a fire, an automated penstock on the outfall of the final attenuation pond will close off the outflow to contain any release of potentially contaminated material onsite pending further assessment. Potentially contaminated stormwater (e.g. in the event of a spill/loss of containment) that enters the stormwater attenuation pond will be tested prior to discharge to the receiving sewer. Contaminated stormwater will be pumped out of the attenuation pond for appropriate offsite treatment.

7.3.2 Foul Water

Foul effluent generated onsite will include sanitary waste (bathrooms, sinks and canteen facilities) and cooling water from the ICT facility which will be discharged via single emission point SE1 to the external foul sewer network. Cooling water generation for emission to sewer will be limited to hot summer months only when the cooling system is required to operate in evaporative mode. Outside of such periods, the ICT facility is served by air cooling. The foul sewer network will ultimately discharge to the Arklow WWTP.

An assessment of 'equivalent level of protection' for the emission to sewer considering the municipal WWTP downstream is included as part of the licence application (Attachment 7.3.2). A Connection agreement has been signed between CDAL and Uisce Éireann in respect of this site.

7.4 Noise

Computer-based prediction modelling using proprietary noise calculation software was carried out in order to quantify the noise levels arising at the nearest offsite noise sensitive locations (NSLs) as a result of the operation of the new installation. The noise model developed for the installation included all proposed development within the installation boundary.

For all identified operational scenarios, the predicted noise levels at offsite NSLs comply with the relevant noise criteria identified for the site in accordance with NG4.

7.5 Soil and Groundwater

There are no proposed direct emissions to ground and no evidence of historical contamination present at the site of the proposed development.

The historic and current uses of the brownfield site include industry and production. There is no evidence of soil or groundwater contamination at the site based on visual assessment and laboratory analysis of soil and groundwater samples completed as part of the site investigation carried out in 2023.

Measures to contain and prevent accidental releases are described in detail as part of the Baseline Report (Attachment 4.8.3), which will minimise the risk of contamination in future as a result of the operation of the installation.

In the absence of emissions to ground / groundwater from the planned installation and having regard to the results of the site investigation (with no evidence of contamination due to historic or current use of the site), it is concluded that compliance with groundwater quality standards will be maintained. No significant impact on soil or groundwater is considered likely.

7.6 Transboundary Impacts

There are no anticipated impacts over long distances or outside the territory of Ireland as a result of the operation of the proposed installation.

The main emissions to atmosphere will be controlled and monitored to ensure compliance with emission limit values contained in the IE licence. Modelling of emissions to atmosphere, as reported within the licence application, has demonstrated that resulting ambient ground level concentrations are below the relevant air quality standards for all pollutants modelled, for both the normal and emergency scenarios considered.

8 Compliance

8.1 Air Emission Limits

The main channelled emissions to atmosphere at the installation will arise from the operation of the diesel generators in an emergency scenario. These are classified as minor emissions and are outside the scope of the LCP CID. The emergency generators fall within the scope of the Medium Combustion Plant (MCP) Regulations (S.I. No. 595 of 2017), which transposed the Medium Combustion Plant (MCP) Directive (EU 2015/2193).

8.2 Noise Emissions

For all identified operational scenarios and noise emissions, the predicted noise levels at offsite receptors will comply with the relevant noise criteria identified for the site in accordance with EPA noise guidance NG4. Monitoring of noise levels due to the operation of the installation will be carried out at least annually and in accordance with IE licence requirements to ensure compliance with noise limit values.

8.3 Groundwater Protection

There will be no licensed emissions to ground or groundwater associated with the operation of the proposed installation.

Measures to minimise the risk of an accidental release to ground/groundwater are described in the Baseline Report (Attachment 4.8.3). Monitoring of groundwater will be carried out in accordance with IE licence requirements.

9 Risk Management

9.1 Risk Management

The installation will be operated in accordance with a number of Standard Operating Procedures (SOPs), which will be developed for the site in conjunction with the site Environmental Management System. These will address all environmental controls onsite including fuel delivery, chemical storage and handling, waste management; bund and pipeline integrity testing, incident response and reporting procedures. Adherence to the SOPs by way of employee training in addition to routine review and update of SOPs will minimise the risk of deviation from normal and safe operation of the installation.

An Accident Prevention Procedure (APP) and Emergency Response Procedure (ERP) will be developed for the site in accordance with IE Licence requirements and latest EPA guidance. The APP will describe the measures and procedures in place to prevent and minimise the risk of accidents. The ERP will detail the required actions to be undertaken in the event of an incident on site and will cover all possible emergency scenarios including fires, chemical spills, explosions, etc. The APP and ERP will be reviewed regularly (at least annually) and updated as required.

9.2 Fire Safety

The installation will be equipped with automated fire detection systems (heat and smoke) as well as natural gas detection systems.

The fire detection and alarm systems will be connected to the sprinkler and gas suppression systems and these will be triggered in the event of a fire. The fire detection and alarm systems will be subject to routine checks by trained personnel and inspected and tested by a qualified external service provider on a regular basis.

9.3 Other Than Normal Operating Conditions

The site will be manned 24/7 to facilitate management of procedures during abnormal conditions.

The modelling of both emissions to atmosphere and noise emissions for the installation has considered operation of the facility during abnormal conditions, including operation of the emergency generators for the ICT facility.

9.4 Site Closure and Liability

The facility does not fall into any of the eight categories² which require agreement with the Agency of costs and provisions for environmental liabilities. These categories include:

1. Landfills (excluding closed local authority landfills closed before 16 July 2009)
2. Category A Extractive Waste Facilities
3. High Risk Contaminated Land Facilities
4. All Hazardous Waste Transfer Stations

² EPA Approach to Environmental Liabilities and Financial Provision, EPA, 2019

5. Non-Hazardous Waste Transfer Stations (accepting >50,000 tonnes/annum)
6. Incineration (including co-incineration of hazardous waste)
7. Upper and Lower Tier Control of Major Accident Hazard (COMAH) Sites (also known as 'Seveso' Sites)
8. Exceptional circumstances associated with the site, e.g., significant ground/groundwater contamination.

A Closure Plan has been prepared and submitted as part of the IE licence application (Attachment 9.2.3). This Closure Plan describes the measures to be taken on and following permanent cessation of the licensed activity to avoid any risk of environmental pollution and return the site of the activity to a satisfactory state.