



Air Quality Management Plan

Outage Scenarios at CWL01 & CWL02

PREPARED FOR
MSFT MCIO Limited

DATE
28 May 2026

REFERENCE
0817714



DOCUMENT DETAILS

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Air Quality Management Plan

Outage Scenarios at Microsoft CWL01 & CWL02

0817714



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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AQMA	Air Quality Management Area
AQMP	Air Quality Management Plan
AEGL	Acute Exposure Guideline Level
AQS	Air Quality Standard
m	Metre
EP	Environmental Permit
EOP	Emergency Operating Procedures
LA	Local Authority
NCC	Newport City Council
NOx	Nitrogen Oxides
NRW	Natural Resources Wales

1. INTRODUCTION

Microsoft CWL01 & CWL02 (the site) is a data centre campus operated by MSFT MCIO Limited (Microsoft). The site is regulated by Natural Resources Wales (NRW) under environmental permit (EP) EPR/DB3691FK. The main activity permitted at the site is the operation of diesel generators providing emergency backup power in the event of a grid or on-site electrical failure. The permit and planning for the site required an air quality management plan (AQMP) to be developed, considering operations of the site's emergency back-up diesel generators that may impact local air quality.

This procedure is separate to any health and safety related emergency operating procedures (EOP) and risk assessments for on-site staff. The AQMP includes identified responsibilities within Microsoft for actions to be taken in the event of an emergency, including notification of the competent authorities where required.

This AQMP has been prepared by Environmental Resources Management Limited (ERM) on behalf of Microsoft. All details of current and anticipated future operational data and activities referenced have been provided to ERM by Microsoft.

Location details of the site are provided in **Table 1** below.

TABLE 1 SITE INFORMATION

Permit Number	EPR/DB3691FK
Address	CWL01 Celtic Way Coedkernew Marshfield Newport NP10 8BE United Kingdom
National Grid Reference	ST278841

Documents related to this AQMP are listed in **Table 2** below.

TABLE 2 RELATED DOCUMENTATION

Document	Title	Notes
EPR/DB3691FK	Environmental Permit	NRW issued EP authorizing operation of emergency diesel generators at the MSFT data centre
EPR/DB3691FK Schedule 5	Notification form	EP Schedule 5 Notification form: Part A: to be completed and issued to NRW within 24 hours of an incident Part B: to be submitted as soon as practicable
Air Quality Assessment (AQA)	Air Quality Assessment Microsoft Newport Quinn Environmental Permit Assessment – Permit Variation	Version 7, ref. 0657169 and dated: 8 th October 2025

Document	Title	Notes
Planning Decision	Notice of Decision	Revision 05 – 10 th July 2025 Application no. 24/0006

1.1 PERMIT REQUIREMENT FOR AQMP

Improvement Condition 1 (IC1) of the EP outlines the requirement for Microsoft to develop an Air Quality Management Plan (AQMP). IC1 reads as follows:

The operator shall develop and submit a site-specific Air Quality Management Plan AQMP in conjunction with the Local Authority which identifies the emergency operating conditions (grid failure) when Local Air Quality may be adversely impacted by emissions to air from the installation. This shall include but not be limited to the following considerations:

- *predicted potential impacts indicated by the air modelling at individual sensitive human receptors;*
- *timescales for response measures;*
- *how local conditions during a grid failure might influence the response required, for example meteorological conditions or time of day;*
- *contingency for how the response will be carried out in the event scenario i.e. loss of power;*
- *co-ordination and co-operation arrangements with co-located backup facilities which may be operating at the same time; and*
- *timescales for continued review of the management plan.*

The agreed AQMP shall be submitted to Natural Resources Wales for approval.

1.2 PLANNING REQUIREMENT

As well as this AQMP responding to IC1 of the EP, it has also been prepared to fulfil the requirements of a pre-operational planning condition referenced in the site's planning consent, *Condition 14 AQMP from Notice of Decision, planning application no. 24/0006*, issued by Newport City Council on the 18th December 2025. Condition 14 reads as follows:

Prior to the first occupation of either building hereby approved, an Air Quality Management Plan (AQMP) will need to be submitted to and approved in writing by the Local Planning Authority. The AQMP will need to include, but not be limited to the following information;

- *Scenarios requiring the use of the AQMP*
- *Details of scheduled testing of diesel generators sets and the protection of air quality and human health that will be achieved.*
- *Details of power outage event procedures and how these will protect air quality and human health.*
- *Actions to be followed during outage/testing periods including communication and surveillance.*
- *LPA approval must be sought where any additional diesel generators are sought and details of how this will maintain air quality and human health protection.*

- *Where real time air quality sensors will be deployed as part of the AQMP in keeping with other data centres.*
- *Details of supplementary mitigation such as secondary catalytic treatment and how they will be deployed.*
- *Detail of NO₂ levels that could occur during power outages or testing and what the human health symptoms associated with this may look like for purposes of emergency planning.*
- *Responsibilities*
- *Contacts including emergency notification, emergency scenarios, scripts and private access contacts.*

An annual monitoring report will need to be submitted the Local Planning Authority by no later than the 31st December for each year following commencement of first use, for a period of 5 years.

Reason: In the interests of preserving air quality within the local environment in accordance with Policy SP1, GP2 and GP7 of the NLDP 2011-2026 (adopted January 2015).

This document outlines the AQMP to be used in the event of a power outage scenario at the Site and has been prepared in response to IC1 of the EP and condition 14 of the Planning Decision.

MSFT will complete a periodic review, once a year, of this AQMP and update details where any changes affecting its content are identified. In case of any material updates following changes to site operations that may impact air quality (e.g. addition of new generators), then MSFT will notify NRW and NCC of these and re-issue the amended AQMP to them once available. Any such material changes will also require permit variations and planning amendments, which will be undertaken and managed separately.

It is noted that condition 14 of the Planning Decision requires an annual monitoring report to be submitted to NCC by no later than the 31st December for each year following commencement of first use of the AQMP, for a period of 5 years. These reports are separate to this submission and will be submitted to NCC as per the requirements.

2. RECEPTORS

The Site is located within an industrial campus in Imperial Park, Newport, amongst other commercial buildings.

The principal identified sensitive human health potential receptors are listed in Table 3 and shown in **Figure 1**.

TABLE 3 LOCATIONS OF POTENTIAL SENSITIVE HUMAN RECEPTORS

Receptor name	Type of receptor	X coordinate	Y coordinate	Approximate distance from the CWL01 & 02 generators (km)
Residential properties 1	Residential	327665	183549	0.6
The Parc Golf Club	Golf Club	327224	183648	0.83
Alan's Jungle Plants	Nursery	326710	183891	1.21
Greenfields High School	School	327929	185856	1.68
Residential properties 2	Residential	327362	184426	0.58
<u>Residential properties 3 at Church Crescent¹</u>	<u>Residential</u>	<u>327453</u>	<u>184367</u>	<u>0.48</u>
Residential properties 4	Residential	327402	184287	0.46
Residential properties 5	Residential	327243	184522	0.70
Residential properties 6	Residential	327374	184585	0.63
Residential properties 7	Residential	327435	184639	0.61
Residential properties 8	Residential	327535	184653	0.56
Residential properties 9	Residential	328303	184904	0.81
Residential properties 10	Residential	328421	184886	0.85
Residential properties 11	Residential	328471	184810	0.83
Residential properties 12	Residential	328719	184758	0.99
Residential properties 13	Residential	328790	184227	0.90
Residential properties 14	Residential	328808	184644	1.02
Residential properties 15	Residential	328844	184552	1.03
St Joseph's Roman Catholic High School	School	329091	184750	1.32
St Brides Medical Centre	Medical Centre	329423	184706	1.62
Residential properties 16	Residential	328790	184227	0.9
Residential properties 17	Residential	328934	184097	1.06
Residential properties 18	Residential	328924	184266	1.04
Residential properties 19	Residential	329189	184385	1.33

¹ This receptor was modelled to be the worst impacted for 1-hour maximum NO₂ concentrations.

3. HEADLINE CAPACITY OF SITE

A total of 31 diesel generators each installed with selective catalytic reduction (SCR) abatement systems. The description of these standby diesel generator capacities on site is detailed in **Table 4** below.

TABLE 4 GENERATOR CAPACITY ON SITE

Item	Description
Installed MWth input	245 MWth
Installed number of standby engines ²	31 diesel-fuelled standby generators proposed across CWL01 and CWL02 28 data hall generators fitted with SCR for NO_x control comprising 28 units each rated 8.8 MW_{th} input, 2 administrative building generators fitted with SCR, comprising 2 units each rated 2.7 MW_{th} input 1 water treatment plant generator fitted with SCR, comprising a single unit rated 1.1 MW_{th} input
Resilience provision for the engines	Each data centre will be protected by Uninterruptable Power Supplies (UPS) capable of maintaining operations for several minutes before generators start automatically. The design provides high resilience through multiple generators and dual grid supplies; generators operate only during grid failure or testing.
Site location	CWL01 & CWL02 Data Centre Campus located at Newport Campus Celtic Lakes Celtic Way Duffryn Newport NP10 8BE.
Stack Arrangement (indicative or average height + characteristic)	Stack heights of all 31 generators are 14.5 m above ground level. All stacks are vertical.
Primary Grid connection description	The site will be served by two incoming power supplies. A day one supply of 13 MVA will be provided by Scottish and Southern Energy (SSE), which will reuse the existing capacity of the 11kV supply, SSE has confirmed that this supply has capacity and will not add any additional pressure onto the local network. The day two supply will be a new supply from National Grid/SSE and fed from the Imperial Park substation. The day two supply will be at the 132 kV level and will provide approximately 92 MVA of capacity to the site. This connection will be a new supply and will be provided at the HV 132 kV level.
Minimum distance to other large data centres or aggregated standby which could share the same Primary Grid connection.	The Newport Data Centre located c. 200 m away and operated by Vantage Data Centers UK Limited (EP ref. EPR/BB3599CW). The proximity of this site means the facility may share the same primary grid connection as the MSFT data centre.
Standby Cluster? – estimated number of any off-site standby engines within 500m radius that would likely operate in a national black-start scenario	There is one permit for a data centre within 500m. This is for Vantage Data Centers UK Limited (EP ref. EPR/BB3599CW). This site operates standby engines which would operate in a national black-start scenario.

² There are also two diesel powered fire water pump engines rated 0.45 MWth input each. These are minor emitters only used in the event of a fire and testing so are not considered by this AQMP.

Item	Description
Nearest sensitive/residential receptor	The nearest residential properties are located c. 0.5 km northwest (Church Crescent) as measured from the centre of the site.
Local Authority AQ Management Zone	The site is not located within an Air Quality Management Area (AQMA). The closest AQMA is Caerphilly Road, located approximately 2.5km north of the Site, for NO_x, Glasllwch AQMA is located 3km north of the site.

3.1 SCR SYSTEMS

SCR systems will be installed on all 31 generators on the Newport site. These are permanently installed abatement systems that will abate NO_x when generators are operating on load and the required warm-up period for the catalyst is achieved.

The AQA to support the EP application for the Site assumed NO_x reduction from the operation of the SCR of approximately 90%. The SCR systems require a warm-up period prior to being fully operational. During the warm-up period, NO_x emissions from the generators are assumed be unabated as the worst case. To consider the operation of the SCRs, the AQA was set up to approximate the effects of a 7-minute and 12-minute warm-up time for the data centre generators and administrative/ water treatment generators, respectively. Air quality results presented in this AQMP consider emission reductions from the installed SCR systems, which accounts for the warm-up time.

4. SCENARIOS REQUIRING USE OF THE AQMP

Potential assumed realistic generator running scenarios are provided in **Table 5**. The table sets out the potential outage, its likelihood, the number of generators likely to be required to run and considers whether action is required under this AQMP based on the outcomes of a modelled air quality impact assessment (AQA) – see referenced AQA in **Table 2**.

The AQA modelled Predicted Environmental Concentration (PEC) 1-hour maximum NO₂ concentrations for generator running scenarios in an emergency at 60% load. The air quality modelling assessment is intentionally conservative, being based on the meteorological data for the single least favourable meteorological year for the years 2017-2021, for all hours in the day which gave the highest modelled NO₂ concentration at a receptor.

Modelled potential NO₂ concentrations at potential receptors have been assessed against the UK 1-hour air quality standard (AQS) of 200 µg/m³, which is not to be exceeded more than 18 times per year, and the US EPA 1-hour Acute Exposure Guideline Level 1 (AEGL-1) of 940 µg/m³. AQSs are concentrations recorded over a given time period, which are considered to be acceptable in terms of what is scientifically known about the effects of each pollutant on health and on the environment. AEGL-1 is the airborne concentration of a substance above which it is predicted that the general population could experience notable discomfort, irritation, or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure. The AEGL-1 threshold does not have any regulatory status in the UK (incl. Wales) but is referenced here as a guideline^{3 4}, above which humans may experience symptoms of acute NO₂ exposure. AEGL-1 is considered the threshold which requires AQMP Actions.

Based on a conservative modelling assessment, the outage scenarios which have been assessed are not considered to have the potential to exceed the AEGL-1 threshold/ 1-hour AQS for NO₂ at sensitive receptors in the vicinity of the Site (listed in **Table 3**). The actions outlined in this AQMP are therefore unlikely to be triggered in practice, however, this AQMP is available for reference if required by the MSFT site manager and/or competent authorities during a prolonged outage. **All unplanned operation of the generators require reporting to NRW within 24 hours regardless of cause or duration.**

As required by condition 14 of the NCC planning decision, a summary of the permitted test regime is also provided in **Table 6**. The AQA did not model any of the planned testing activities to exceed any relevant thresholds. A summary of the testing regime is included in this AQMP for completeness. **Unlike unplanned operations, no permitted testing regime activities will require reporting to NRW. This is because these operations are covered by the EP.**

³ Nitrogen Dioxide - AEGL Program | US EPA

⁴ There are no published short term exposure limits for ambient NO₂ published in the UK incl. Wales. In the absence of such limits, the US EPA AEGL-1 thresholds have been considered by this AQMP.

TABLE 5 OUTAGE SCENARIOS

Scenario		Description of Realistic Outage Scenarios based on a review of the way the site could reasonably be expected to react to a range of modes of power loss	Probability	Number of generators and load (%)	Potential to exceed AEGL-1 level? If yes, notify local authority and NRW as soon as possible.	Active management using actions in Section 0 required
1	Assumed worst case – full site outage	All 31 engines running concurrently on-site at 60% load for one hour, following an on or off-site failure requiring all generators to operate	Highly unlikely	31 generators running at 60% load	No	No
2	General equipment failure e.g. transformer fault	In the event of a critical piece of general equipment failing at a single colo ⁵ , then one engine at the affected colo would operate for the duration of the outage and shut down once the failure is resolved	Highly unlikely	Worst case, failure of equipment at each of the site's five colos: one generator running at 60% load at each affected colo – potentially up to five generators running in total across the site Best case, failure of equipment at a single colo: one generator running at 60% load at the affected colo	No	No

⁵ For reference, the site comprises five colos. Each colo comprises four cells (20 cells total across the site).

TABLE 6 TESTING AND MAINTENANCE SCENARIOS

Type of test/ Frequency	Indicative Duration	Scheduling	Load	Potential to exceed AEGL-1 level? If yes, notify local authority and NRW as soon as possible.	Active management using actions in Section 0 required
Testing Regime					
Monthly	15 minutes	Generators will be tested individually	No load	No	No
Quarterly (three times a year)	30 minutes		70% maximum		
Annually	1 hour		100% maximum		
Annually – power interruption test	1.5 hours		60% maximum		
Every 5 years – USS switchgear test		Multiple generators at a time ⁶	Variable		
Every 5 years – UPM switchgear test					
Ad hoc Maintenance					
Colo MV maintenance	All four engines at a colo running concurrently for planned maintenance activities	Planned activity	Four generators running at 60% load	No	No

⁶ The number of generators tested concurrently for routine maintenance is planned to be limited where the type of electrical maintenance work allows. This is to reduce emissions from multiple generators running at any one time.

A summary of the air quality modelling assessment undertaken for the worst-case outage scenario is provided in **Table 7**.

TABLE 7 AIR QUALITY ASSESSMENT HEADLINE FIGURES

Results for the Predicted Environmental Concentration NO₂ air quality assessment	
Conservative peak NO ₂ concentrations under the worst-case scenario	For the emergency scenario of 31 generators running a peak NO ₂ concentration of up to 70.9 µg/m ³ (1 hour maximum (100 th %ile) has been modelled for the Predicted Environmental Concentration (PEC), based on 60% load. This concentration was modelled at Church Crescent (x,y co-ord. 327453, 184367) and is underlined in Table 3 showing locations of potential sensitive human receptors.
Key risk factors, as identified by air quality assessments	
Times of day, season	If generators are required to run in an emergency during rush hour, this may have a greater potential net effect on nearby receptors in combination with emissions from road traffic. The running of the generators in an emergency cannot, however, be managed to avoid specific times of the day.
Wind direction	Wind direction is an important factor as it will influence the plume direction should an outage scenario occur i.e. if the wind is blowing towards residential areas during emergency operations then impacts will be higher. Weather data from the Met Office website (available here: Newport (Newport) weather - Met Office) and wind rose record information provided in Figure 3.
Note: The probability of an emergency event coinciding with the least favourable hours of meteorological data for dispersion is extremely low.	

5. MONITORING ACTIVITIES

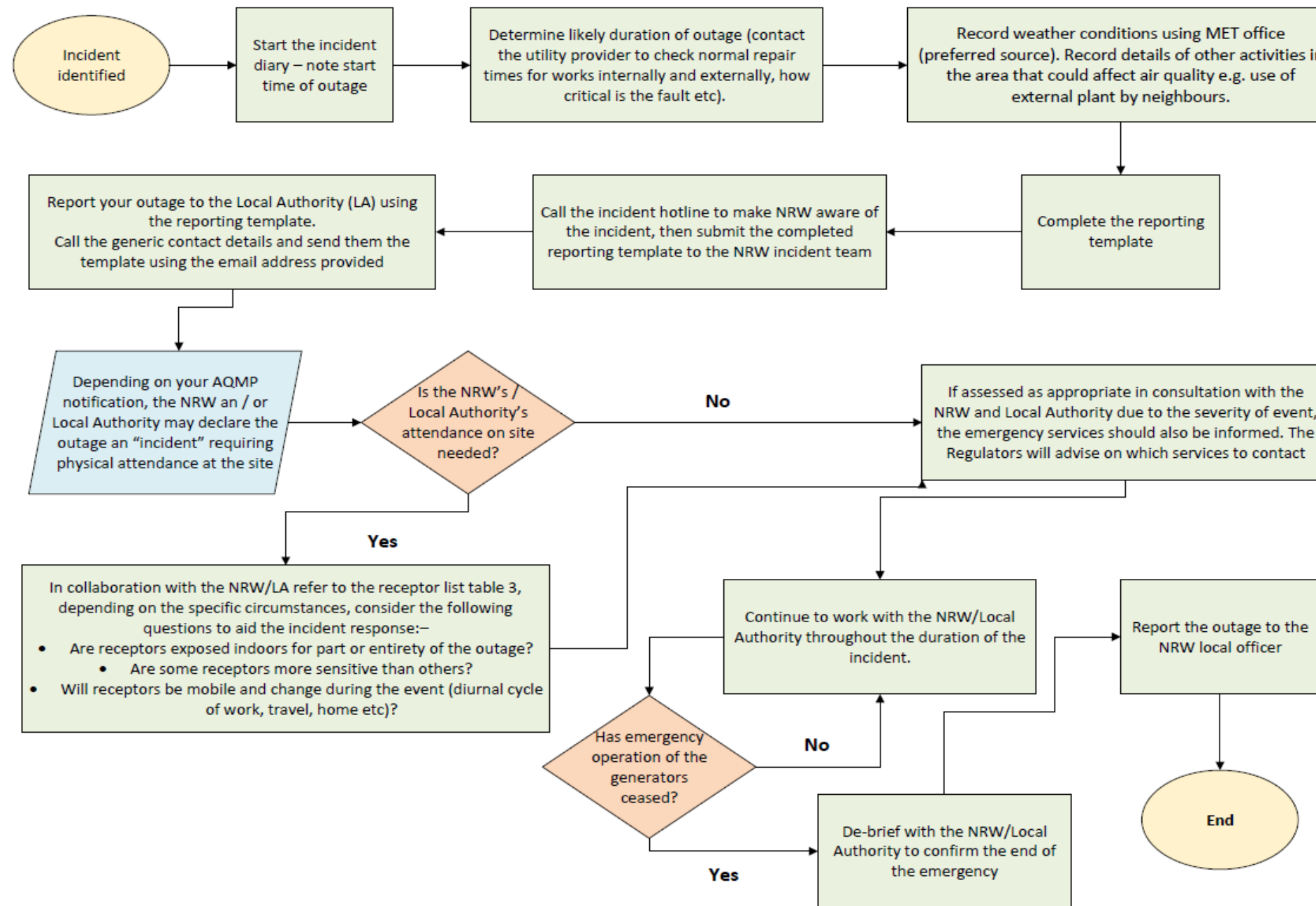
Since the worst-case emergency scenario of 31 generators running concurrently is modelled to result in a peak NO₂ PEC of up to 70.9 µg/m³ i.e. not exceeding the AEGL-1 AQMP trigger threshold nor the 1-hour AQS, no specific monitoring activities are proposed to be followed by MSFT in the event of an emergency outage. This concentration was modelled at Church Crescent (x,y co-ord. 327453, 184367) and is underlined in **Table 3** showing locations of potential sensitive human receptors.

MSFT has instead invested in SCR abatement systems that limit NO₂ pollution at source, which reduces emissions and potential impacts from generator operations to residents. These systems will be appropriately maintained during the operation of the data centre, to allow their effective operation in abating NO₂ emissions from the generator exhausts.

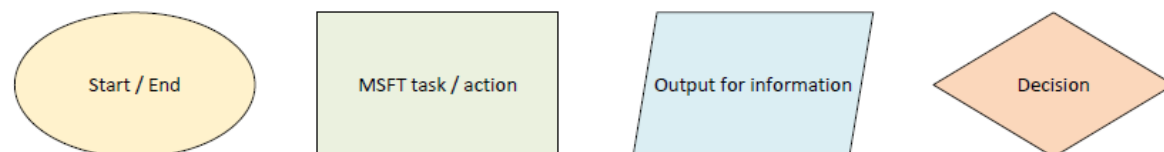
6. ACTIONS TO BE FOLLOWED DURING OUTAGE SCENARIOS

FIGURE 2 AQMP PROCESS FLOW

Note 1: please refer to **Appendix A** for the reporting form template. Part A needs submitting for the initial incident notification. Part B needs to be submitted once the full details of the incident are known.



Key:



6.1 COMMUNICATION

As emergency running is considered highly unlikely, MSFT does not propose to publish this emergency operating procedure. It is at NRW and/or NCC's discretion if they wish to notify nearby potential receptors that an emergency procedure exists and further details of it will only be communicated if required.

In the event of a loss of power throughout the entire site and other emergency backup generator clusters then MSFT will communicate this to NRW/NCC, as per the process flow shown in **Figure 2**.

6.2 WIND-ROSE

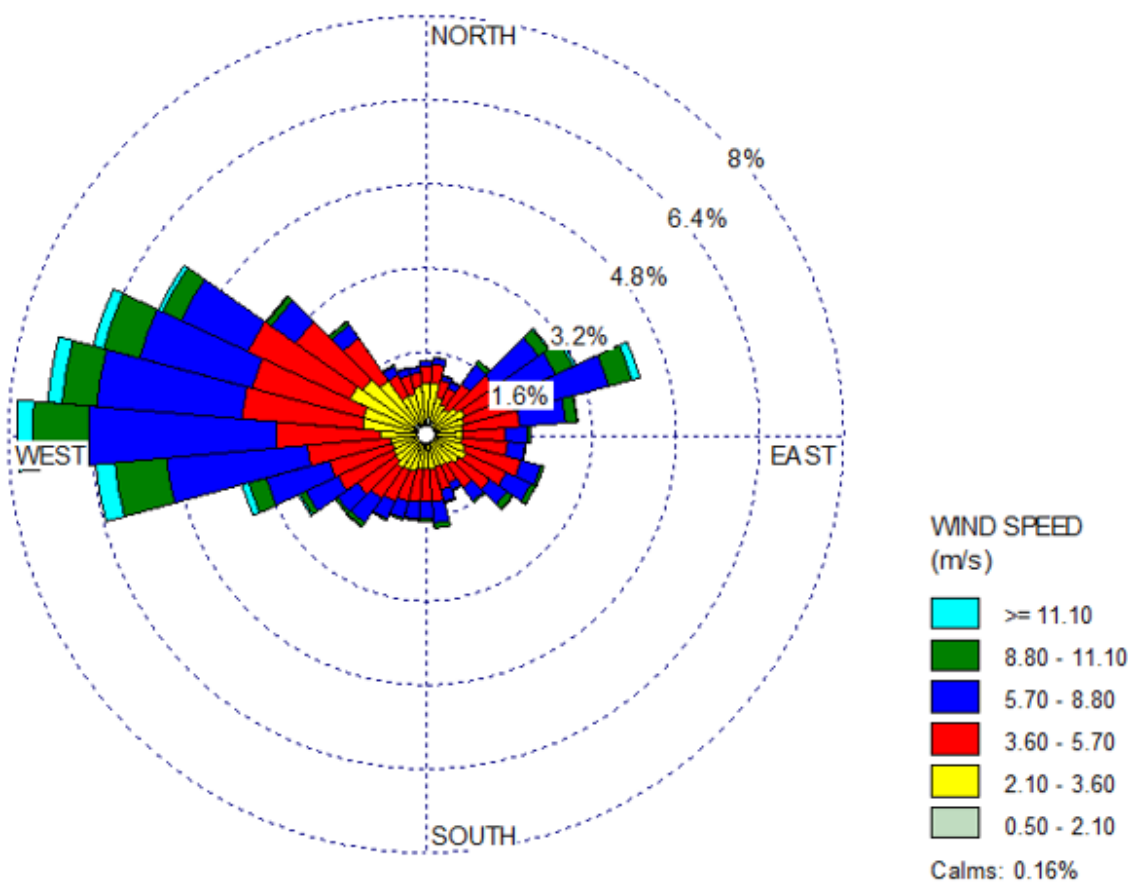
Current/forecast wind directions can be obtained from the following sources:

- NP10 - BBC Weather
- Newport (Newport) weather - Met Office

The wind rose is shown in **Figure 3**. The wind rose diagram shows a five-year distribution of wind speeds and directions for Cardiff between 2017 to 2021.

Following engagement with NCC, it has been confirmed that they maintain a wind monitor (Bettair System) that may potentially be used by MSFT in the future for more localised wind effects. Potential future access to this system will be reviewed as part of the period annual updates to this AQMP.

FIGURE 3 WIND-ROSE



7. RESPONSIBILITIES

Where action is required, relevant roles and responsibilities of MSFT data centre staff as relevant to this AQMP are outlined in the table below.

TABLE 8 RESPONSIBILITIES

Names	Company	Description
Critical Environmental Operations Manager	Microsoft MCIO	Responsible person to accept and deal with receipt of incident notification and be responsible for lead of MSFT Incident Management Process.
		Responsible for accepting and dealing with receipt of incident notification and responsible for leading MSFT Incident Management Process during incidents overnight or at weekends.
		Responsible for contacting the power supplier in the event of a power outage, to determine how long it may last.
		Making initial phone call to inform NCC (the Local Authority) of power outage requiring emergency generator operation in line with Figure 2.
		Making initial phone call to inform Natural Resources Wales (NRW) of power outage requiring emergency generator operation, in line with Figure 2. (This includes submission of Notification Form and Emergency Scenario form to NRW.)
		Determines wind direction to help assess plume dispersion direction and which receptors to contact/inform.
		Managing complaints.

8. CONTACTS

A primary contact for MSFT and contact details of external third parties that may need contacting in the event of an outage are outlined in the below table.

TABLE 9 PUBLIC ACCESS CONTACTS

Operator Contact		
Corporate contact and call centre	MSFT contact for general enquires	<i>MSFT placeholder to confirm details once site construction is advanced and a contact number is known.</i>
External Contacts		
Local Council	Newport City Council general enquires	01633 656 656 info@newport.gov.uk
	Environmental Health	environmental.health@newport.gov.uk
	Community Safety Enforcement Team	CommunitySafetyEnforcementTeam@newport.gov.uk
	Air Quality	Air.Quality@newport.gov.uk
Regulator incident hotline ⁷	NRW incident hotline	0300 065 3000
	NRW incident email	icc@cyfoethnaturiolcymru.gov.uk
	NRW online incident reporting system	Natural Resources Wales / Report an incident

Private access contacts (GDPR considerations) can be found in **Appendix B**.

⁷ The NRW incident hotline is the primary NRW contact for reporting an outage and potential air quality incident.



APPENDIX A SCHEDULE 5 NOTIFICATION FORM

Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	EPR/DB3639FK
Name of operator	MSFT MCIO Limited
Location of Facility	Newport Campus, Former Quinn Radiator Manufacturing Site, Imperial Business Park, Celtic Way, Dyffryn, Newport, NP10 8BE
Time and date of the detection	

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment

To be notified within 24 hours of detection

Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a permit condition

To be notified within 24 hours of detection unless otherwise specified below

Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit

Parameter	Notification period

(c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:

To be notified within 24 hours of detection

Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator



APPENDIX B PRIVATE ACCESS CONTACTS

Contact Name	Contact Number	Contact Email
Guy Baskerville – NRW Lead Specialist, Industry Regulation (Temporary Site Officer) ⁸	T: 03000 653203 M: 07773 040 340	Guy.Baskerville@cyfoethnaturiolcymru.gov.uk
Critical Environmental Operations Manager	MSFT placeholder to confirm details once site construction is advanced and a contact number is known.	<i>MSFT placeholder to confirm details once site construction is advanced and a contact email is known.</i>

⁸ The NRW Site Officer is the secondary NRW contact for reporting an outage and potential air quality incident.



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China	Puerto Rico
Colombia	Romania
France	Senegal
Germany	Singapore
Ghana	South Africa
Guyana	South Korea
Hong Kong	Spain
India	Switzerland
Indonesia	Taiwan
Ireland	Tanzania
Italy	Thailand
Japan	UAE
Kazakhstan	UK
Kenya	US
Malaysia	Vietnam
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