



P1191-01 Response to EPA Letter Dated 24th Aug 2026

Site: Dub 6,7,8,9,10,12 & 13

IE Licence No: P1191-01

Subject: Response to CRAMP and ELRA Request received 24-8-26

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*Regional Environmental Compliance
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Dr. Cian Redmond,

Following receipt of the EPA communication dated 24th August 2026 requesting that Microsoft respond to the EPA by the 25th September 2026 outlining a plan to complete a Closure Aftercare Residual Management Plan (CRAMP), Environmental Liabilities Risk Assessment (ELRA) and provide for the financial provision based on our lower tier COMAH site classification, please see details outlined below.

Context

The P1191-01 IEL site includes Dub 6,7,8,9,10,12 & 13 has fuel storage exceeding 2,500 tonnes with approximately 2,700 tonnes maximum fill capacity. The site applied for and was granted COMAH status due to the fuel storage capacity however Microsoft replaced all the Gas oil/Diesel fuel in all our back generators with HVO fuel in 2024. Gas oil remains in the fire pump tanks, with this gas oil fuel volume comprising 1.7 tonnes (less than 0.0007%) of the overall 2,700 tonnes of fuel stored at the P1191-01 site.

The site remains notified as lower tier COMAH, while the substances currently stored do not meet the qualifying criteria, as HVO is not listed as a relevant substance in S.I. No. 209 of 2015. Table 1 below compares Diesel and HVO for reference.

Table 1 Comparison of Gas Oil (Diesel) and HVO Fuel

Characteristic	Gas Oil (Diesel)	Hydrotreated Vegetable Oil (HVO)
Source	Derived from crude oil	Derived from renewable sources (waste plant matter or animal fats)
Renewable	No, derived from crude oil	Yes, derived from renewable sources
Carbon Footprint	Higher carbon footprint due to crude oil extraction and refining	Lower carbon footprint, considered a more sustainable option
Hazard Phrases	H226 – Flammable liquid and vapour H304 – May be fatal if swallowed and enters airways	H304 – May be fatal if swallowed and enters airways



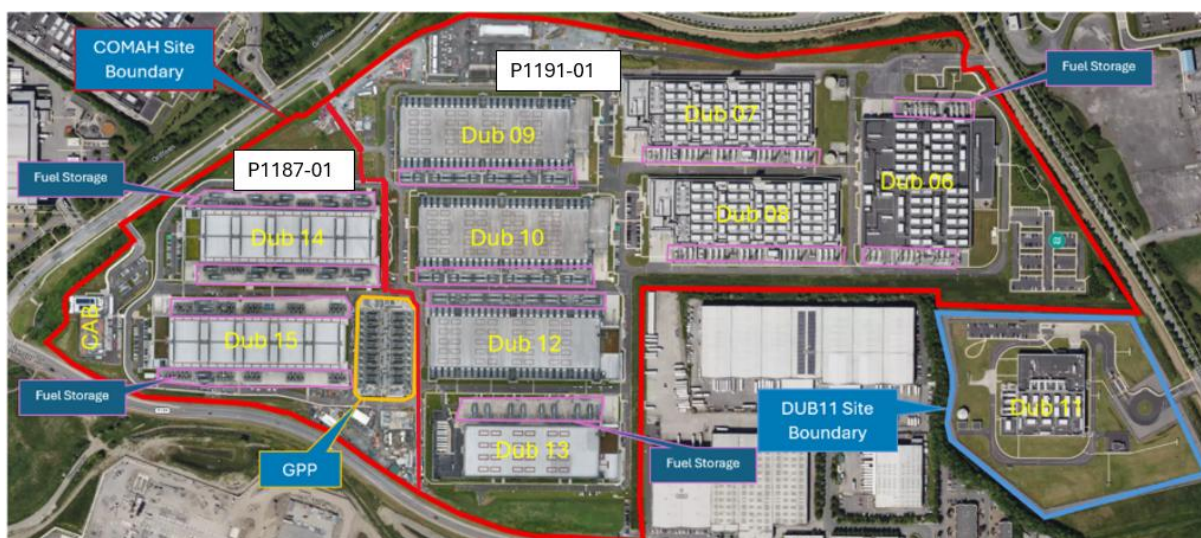
	H332 – Harmful if inhaled H315 – Causes skin irritation H351 – Suspected of causing cancer H373 – May cause damage to organs through prolonged or repeated exposure H411 – Toxic to aquatic life with long lasting effects	
Substance Regulated under COMAH	Subject to COMAH (petroleum products and alternative fuels), due to flammability and toxicity and environmental hazards	Not subject to COMAH; considered a non-COMAH substance due to absence of relevant COMAH hazard phrases

Microsoft has retained the lower tier COMAH notification rather than surrendering it, reflecting the possibility that HVO may in future need to be replaced with gas oil in the event of a sustained supply shortage. There is no current indication of any such shortage, and any such change would be implemented on a phased basis over a prolonged duration (under normal operation up to 7/8 years). Any such change would be notifiable to the Agency in advance under the conditions of IE Licence P1191-01, at which point the appropriateness of a CRAMP and ELRA could be reconsidered.

In addition, the maximum individual fuel storage capacity of any of the bunded belly tanks is 40,000 litres. The maximum capacity of a generator yard (zones shown in pink below in figure 1) is 12 generators, therefore maximum of 480,000 litres storage in any zone.

The COMAH site and IEL site boundaries are shown in the figure 1 below, the large area to the east shows the P1191-01 IEL site and the smaller area to the west shows the P1187-01 site. The areas highlighted in pink indicate the 12 separate fuel storage areas (generator yards). There are eight areas in P1191-01 IEL and there are four areas in the P1187-01 IEL.

Figure 1 : COMAH site Boundary and IEL Boundaries





The Fire Water Risk Assessment (FWRA) submitted to the EPA December 2024 for P1191-01 has been accepted. This FWRA confirms there are 1.7 tonnes of hazardous substances stored on site and the HVO stored on site does not have any H400 – H499 hazard phases.

3.0 Proposal

Microsoft request that the EPA reconsider the request for a CRAMP and ELRA considering the operational status of the site and risk profile of the HVO storage on the P1191-01 IEL site. We are happy to facilitate a site visit should this be required.