



*ESB West Offaly Power,
Shannonbridge,
Co. Offaly
Ireland*

Proposal to use Biomass in ESB West Offaly and Lough Ree Power

ESB West Offaly Power, Shannonbridge, Co. Offaly



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Introduction

ESB Lough Ree Power P0610-02 and West Offaly Power P0611-02 current planning permissions expire on the 31st of December 2020. ESB have sought to transition the station from firing on Peat only, to cofiring with Biomass. ESB Lough Ree Power submitted a planning application PL 19/38 on the 13th of February 2019 to Longford County Council in relation to the transition to Biomass. ESB West Offaly Power submitted a planning application to an Bord Pleanála under the Strategic Infrastructure Development Applications (SID) process 303108 on the 26th of November 2018 also in relation to the transition to Biomass. Both process are currently ongoing with the respective authorities.

It is anticipated that IE review applications for both sites for the transition to biomass will be submitted to the EPA shortly. ESB Lough Ree Power is currently under an IE review process P0610-03 . If planning permission is granted by the associated authorities to allow the stations to burn Biomass/Peat ,then there is a potential period during which the current stations IE licences will remain in effect until the IE review process for the transition to full biomass has been completed.

The current stations licences P0610-02 and P0611-02 contain condition 3.14; *“Combustion plant shall have the capacity to burn peat and use “short rotation biomass” as a potential fuel.”*

The purpose of this document is provide a proposal to the EPA on ESB’s interpretation of “short rotation biomass” as contained in Condition 3.14. of the current licence.

Intrepretation of Condition 3.14

The term Short Rotation Biomass was included in the IE Licences for WOP and LRP under condition 3.14, however and the term was not defined therein .ESB interprets short rotation as outlined below as per the RED II directive under the definition of Biomass.

The European Union’s directive to Member States in relation to renewable energy is set out in *“Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources {recast}”*, (*“RED II”*).

RED II includes the following definition for Biomass in Article 2;
(24) ‘biomass’ means the biodegradable fraction of products, waste and residues from biological origin from agriculture, including vegetal and animal substances, from forestry and related industries, including



fisheries and aquaculture, as well as the biodegradable fraction of waste, including industrial and municipal waste of biological origin;
(25) 'agricultural biomass' means biomass produced from agriculture;
(26) 'forest biomass' means biomass produced from forestry;

Short Rotation Forestry is a well-documented term in the biomass industry, see Appendix for referenced links.. Short Rotation Forestry are, single or multi-stemmed trees of fast growing species grown on a reduced rotation length (less than 20 years in Ireland) primarily for the production of biomass occupies a niche between the highly productive short rotation coppice systems and conventional forestry. It provides more flexibility than a coppice system in that a much wider variety of species can be used such as Eucalyptus, Sitka Spruce, Fir, Poplar, Ash, Alder, Pine. It is also noted that Eucalyptus is (woodchips, pellets etc) referenced as short rotation coppice/forestry in the Red II under Annex VI A, C , D and in Teagasc papers (see papers referenced in appendix below). Eucalyptus generally has a 10-20 year rotation

Short Rotation Coppice (SRC) , is another well documented term within the biomass industry, and SRC generally refers to densely planted, high energy crops harvested on a two to five year cycle, with willow being the most prevalent in Ireland.

Biomass Trials 2019

ESB intends on conducting further Biomass trials in Q3 2019 in both stations and will be issuing a proposal on these trials to the EPA shortly. The purpose of this trial is to establish the logistics and blends involved in cofiring of imported Eucalyptus and Irish virgin non treated woodchip with Peat in an ISEM market.

Conclusion

It is therefore ESB 's interpretation as per the RED II directive that Short rotation biomass /forestry includes that of Willow and Eucalyptus and virgin non treated Woodchip. If the planning permissions are granted for both stations, ESB would be seeking to cofire these types of biomass materials listed above under IE licence condition 3.14 until the IE review process for both stations has been completed. The stations and their respective ADFs will continue to be managed in accordand with its IE licence and ADF operational plans. It is anticipated that a reduction of ash quantities will occur from the combustion of biomass.

In the event the station does not receive a grant of planning from ther respective planning authorities or suitable revised IE licences , it will continue to operate under its current IE licences until the expiry of its current planning at the end of 2020.



Appendices

Links

RED II Directive

https://eurlex.europa.eu/legalcontent/EN/TXT/?uri=uriserv:OJ.L_.2018.328.01.0082.01.ENG&toc=OJ:L:2018:328:TOC

Teagasc Referenced Links to Short Rotation Forestry

1. <https://www.teagasc.ie/crops/forestry/research/shortfor-project/shortfor-project---work-package-5/>
2. De Miguel, A., Sottocornola, M., Cronin, B. and Kent, T. (2016) **Exploring market opportunities for SRF** in the current Irish wood processing and solid biofuel sectors (PDF). Irish Forestry 73 (1&2): 141–160.