

Site Visit Report

The site visit process is a sample on a particular day of an installation's compliance with some of its licence conditions. Where non-compliance against a particular condition has not been reported, this should not be construed to mean that there is full compliance with that condition of the licence.

Instructions and actions arising from the visit shall be addressed, or where applicable noted, by the licensee in order to ensure compliance, to improve the environmental performance of the installation and to provide clarification on certain issues.

The licensee shall take the actions specified to close out the non-compliances and observations raised in this Site Visit Report.

The licensee may also be requested to provide a response to the Environmental Protection Agency (hereafter referred to as the Agency) in relation to the site visit report findings.

Licensee	
Name of Installation	Timoleague Agri Gen Limited
Licensee	Timoleague Agri Gen Limited
Licence Register No.	P0986-01
CRO Number	511659
Site Address	Barryshall, Timoleague, Bandon, Cork
Site Visit Reference No.	SV31694

Report Detail	
Issue Date	27/11/2025
Prepared By	Krzysztof Pniewczuk

Site Visit Detail			
Date Of Inspection	31/10/2025		
Time In	10:30	Time Out	13:16
EPA Inspector(s)	Krzysztof Pniewczuk Andrew McCabe Gabriella Chisholm		
Additional Visitors			
Licensee Personnel and Role	Colin Bateman - Shareholder, Company Director Derry Murphy - Installation Manager		

> Summary

The Agency carried out this site visit as part of the OEE annual site visit programme to evaluate the Licensee's compliance with the requirements of the Licence.

The Licensee was found to be non-compliant with its Licence at the time of the Agency site visit. Four non-compliances were recorded in relation to:

- compliance with digestate quality standards;
- storm water emission monitoring;
- access to monitoring records; and
- Annual Environmental Report.

In addition, observations were raised in relation to:

- odour abatement infrastructure;
- addressing items raised during the previous site visits;
- waste acceptance and characterisation procedures;
- basic profiling, characterisation and suitability for biological treatment of waste; and
- requirements imposed by by Licence Technical Amendment B.

The issues raised require action to be taken by the Licensee as specified in this report and in Compliance Investigations reference: CI001815, CI002150 and CI002156.

The Licensee is required to submit a response to the non-compliances and observation raised in this site visit report within 21 days of the date of issue of this report (using the 'Make a Response' link on the Site Visits page in EDEN), as outlined in the Follow-up Actions section of this report).

The Licensee is reminded that failure to comply with any Condition attached to a Licence or revised Licence is an offence.

> Site Areas Inspected

The following areas were inspected on site:

- Waste Building;
- Mix tank;
- Digester tanks;
- Pasteurisation tanks;
- Bio-scrubber;
- Digestate storage lagoons;
- CHP engine;
- Installation yard; and
- Environs of the licensed installation.

> Documents Inspected

The following documents were inspected as a part of this site visit:

- A record of daily storm water inspections from Jan to Oct 2025;
- Laboratory analyses record for the sludge feedstock dated 18/10/2025; and
- Bacteria and aspergillus fumigatus laboratory records for Q1 2025.

> 1. Health and Safety

	Answer	Condition Number	Non Compliance	Observation
1.1	Was safe and permanent access to sampling/monitoring points provided?	Yes	3.12	



2. Compost & Anaerobic Digestion Sectors

	Answer	Condition Number	Non Compliance	Observation
2.1	Are compost/stabilised biowaste/digestate quality test results obtained compliant with the quality standards set out in the licence (or an alternative quality standard in use)?	Checked	8.8.1, Schedule E.4	Yes
Comment / Action Required				
<p>The digestate produced at the installation has not met the quality standards specified in Schedule E.4 of the Licence from May 2023 to August 2025.</p> <p>This is non-compliant with Condition 8.8.1 of the EPA Licence.</p> <p>The Agency issued monthly non-compliance notifications for each affected batch during this period. In addition, the Licensee was instructed to conduct investigations into these breaches under Compliance Investigation (CI) reference CI002156. Several required actions remain outstanding.</p> <p>Action Required:</p> <p>Comply with Condition 8.8.1 and complete all outstanding actions under CI reference CI002156 without further delay.</p>				

	Answer	Condition Number	Non Compliance	Observation
2.2	Has the sampling been undertaken at the specified frequency?	Yes	8.9.2	

	Answer	Condition Number	Non Compliance	Observation
2.3	Was the odour abatement infrastructure and practices on-site considered appropriate to contain and treat odours?	Checked	6.14.2	Yes
Comment / Action Required				
<p>The current odour abatement infrastructure on site is not fully appropriate to contain and treat odours. According to the requirements of the installation Licence, the odour abatement infrastructure must comprise a biofilter.</p> <p>Currently, the waste reception building and the three outdoor vessels used for the storage or treatment of residual, food and odour-forming waste and other feedstocks are maintained under negative pressure and the ventilated gases are subject to treatment in a bio-scrubber and activated carbon filter.</p> <p>In July 2024 the Agency approved the Licensee's proposal for installation of a biofilter at the installation. On 12/08/2025, the Licensee submitted an update (EDEN Message reference EM029700, CI Action reference A121079, Compliance Investigation reference CI001815 refer) indicating that an odour abatement system (biofilter) will be installed and commissioned by 01/05/2026.</p> <p>Action Required:</p> <p>The Licensee is required to complete and confirm the installation of the biofilter by 01/05/2026. Any delays must be reported in advance to the Agency by responding to the CI Action reference A121079.</p>				



3. Compliance & Reporting

3.1

	Answer	Condition Number	Non Compliance	Observation
Have the items noted during the previous inspection of this facility been addressed by the licensee?	Checked	Various		Yes

Comment / Action Required

- The following items were noted during the previous Annual Plan site visit (ref. SV27047) on 10/05/2023 and have not been resolved by the Licensee:
 - Submission of Construction Quality Assurance Validation reports for primary and secondary digester and for Waste Building;
 - Installation of gas flare sensors - for this item refer to Compliance Investigation (CI) Action A122261 under CI reference CI002150; and
 - Biogas analyses.
- The following items were noted during the previous Annual Plan site visit (ref. SV27047) on 10/05/2023 and have been partially resolved by the Licensee:
 - Submission of required information and installation of Waste Water Treatment Plant - for this item refer to CI Action A121281 under CI reference CI001815;
 - Flare destruction efficiency - for this item refer to CI Action A121790 under Compliance Investigation reference CI002150; and
 - Connection and pipework to the lined basins.
- A number of items were noted during the independent assessment site visit (ref. SV30185) on 08/09/2023. The items raised by the report have not been addressed and resolved by the Licensee.
- An item in relation to the quality assurance validation report for liquid feedstock pipes was noted during the additional site visit (ref. SV30104) on 23/05/2024 and has not been resolved by the Licensee.
- Elevated concentrations of ammonia and orthophosphate in groundwater were noted following Agency's monitoring site visit (ref. SV28845) on 22/08/2024 and have not been addressed by the Licensee as required.
- Elevated Volumetric Flow Rate measurement at gas engine at Emission Point reference A1 was noted following Agency's air monitoring site visit (ref. SV28845) on 03/12/2024 and have not been addressed by the Licensee as required - for this item refer to CI Action A125957 under CI reference CI002150.
- An item in relation to access to monitoring records was noted during the additional site visit (ref. SV32738) on 25/06/2025 and has been resolved by the Licensee. A similar issue was noted during the most recent site visit on 31/10/2025 and is discussed further in Section 4.4 of this report;
- An item in relation to stormwater monitoring was noted during the additional site visit (ref. SV32738) on 25/06/2025 and has not been resolved by the Licensee - this item is discussed further in Section 4.3 of this report;
- An item in relation to odour emissions from pasteurisation tanks was noted during the additional site visit (ref. SV32772) on 01/07/2025 - this issue has been partially resolved by the Licensee.
- An item in relation to negative air at waste reception building was noted during the additional site visit (ref. SV32772) on 01/07/2025 - this issue has not been addressed by the Licensee.

Action Required:

The Licensee shall address all outstanding actions identified above and provide a detailed response to each as part of the reply to this site visit report or by responding to the relevant CI Action as required.

	Answer	Condition Number	Non Compliance	Observation
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3.2	Did the licensee submit an EPR return for calendar year 2023 and calendar year 2024 (the latter being due by 31st March 2025)?	Yes	6.19		
		Answer	Condition Number	Non Compliance	Observation
3.3	Are storm water visual inspections being carried out as required?	Yes	6.15.1		
		Answer	Condition Number	Non Compliance	Observation
3.4	Has the licensee installed any additional temporary/ emergency power generation units over the past 12 months?	No			
		Answer	Condition Number	Non Compliance	Observation
3.5	Has the licensee changed fuel types over the past 12 months (other than as provided for in the licence)?	No			



4. Site Specific Issues

	Answer	Condition Number	Non Compliance	Observation
4.1	Waste Acceptance and Characterisation Procedures	Checked	8.3 & 8.3.1	Yes
Comment / Action Required				
<p>A review of the Waste Acceptance and Characterisation Procedure was carried out during the site visit. The procedure requires updating to address deficiencies in basic characterisation and compliance testing of waste received at the installation.</p> <p>Action Required:</p> <p>The Licensee shall update the Waste Acceptance and Characterisation Procedure to ensure full compliance with the requirements of Condition 8.3 of the EPA Licence. The revised procedure must include all necessary elements for basic characterisation and compliance testing.</p>				

	Answer	Condition Number	Non Compliance	Observation
4.2	Basic profiling, characterisation and suitability for biological treatment of waste	Checked	8.3.2 and 8.3.5	Yes
Comment / Action Required				
<p>During the site visit, a laboratory analysis record for a newly introduced waste stream (sludge from dairy industry effluent treatment) was reviewed. The examination established that, for the purpose of basic characterisation and verification of the suitability of the waste for biological treatment of waste, the Licensee assessed only maximum metal concentration and percentage of dry matter. This level of waste characterisation is considered to be insufficient.</p> <p>In accordance with Condition 8.3.2, the Licensee shall carry out full waste profiling and basic characterisation for the newly introduced dairy sludge feedstock and for all feedstocks currently accepted at the installation.</p> <p>Additionally, in accordance with Condition 8.3.5 the Licensee shall ensure that Waste accepted for biological treatment at the installation:</p> <ul style="list-style-type: none"> • Is conducive to biological treatment; facilitates the achievement of relevant output quality standards; and • Is compatible with the appropriate end-use for the biologically treated material. <p>Consequently, each waste feedstock must be analysed, at minimum for the following:</p> <ul style="list-style-type: none"> • Relevant parameters outlined in schedule Schedules C.7 and E of the installation Licence; and • Additional parameters specific to to each individual waste feedstock. <p>Action Required:</p> <p>The Licensee is required to carry out a full waste profiling and characterisation for each waste feedstock used at the installation and report the results to the Agency by 31/12/2025.</p>				

	Answer	Condition Number	Non Compliance	Observation
4.3	Monitoring of stormwater emissions	Checked	6.2 6.8 and Schedule C.3.4	Yes
Comment / Action Required				

The installation Licence requires that all storm water analysis be carried out by a competent laboratory, using standard and internationally accepted procedures (Note 1, Schedule C.3.4 refers).

Currently the Licensee measures pH and conductivity in the storm water discharges using a water quality meter.

This is non-compliant with Condition 6.2 of the EPA Licence.

Action Required:

Comply with Condition 6.2.

Should the Licensee required an amendment of the method of pH and conductivity monitoring using a water quality meter, in accordance with Condition 6.8, the Licensee shall submit to the Agency the following:

- Evaluation of test results supporting the alternative method of measuring of pH and conductivity using a water quality meter; and
- A formal request for approval for the amendment of method of monitoring for pH and conductivity.

	Answer	Condition Number	Non Compliance	Observation
4.4	Access to monitoring records	Checked	11.6(iv)	Yes

Comment / Action Required

During the site visit, laboratory records for bacteria and *Aspergillus fumigatus* analyses for Q2 and Q3 of 2025 were not available for inspection.

This is non-compliant with Condition 11.6(iv) of the EPA Licence.

Action Required:

Comply with Condition 11.6(iv).

The Licensee shall submit the records for bacteria and *Aspergillus fumigatus* analyses for Q2 and Q3 of 2025 to the Agency as part of the response to this site visit report.

	Answer	Condition Number	Non Compliance	Observation
4.5	Requirements of Licence Technical Amendment B	Checked	11.14 and 11.16	Yes

Comment / Action Required

On 02/07/2024, the Agency issued Technical Amendment B, which applied the Commission Implementing Decision (CID) of 10/08/2018 establishing Best Available Techniques (BAT) Conclusions under Directive 2010/75/EU for waste treatment (CID 2018/1147).

This amendment replaced certain Licence conditions, introduced new conditions, and set deadlines for the establishment, implementation, and incorporation of various BATs arising from the CID.

In accordance with Condition 11.16 of the installation Licence (as amended), the Licensee was required to:

- Identify the technique, or combination of techniques where applicable, used for each BAT referenced in CID 2018/1147; and
- Prepare and submit a report detailing the selected techniques as part of the Annual Environmental Report (AER).

However, the Licensee did not submit an AER for 2024, and therefore the requirement of Condition 11.16 remains outstanding.

Action Required:

In accordance with Condition 11.16 of the EPA Licence the Licensee is required to carry out the following actions:

- Identify the technique, or combination of techniques where required, used for each BAT referenced in the Waste Treatment CID 2018/1147; and
- Prepare a report setting out the selected technique(s) used and submit this report as part of the AER for the year 2025.

4.6

	Answer	Condition Number	Non Compliance	Observation
Annual Environmental Report	Checked	11.8	Yes	

Comment / Action Required

The Licensee failed to submit to the Agency an Annual Environmental Report (AER) for year 2024.

This is non-compliant with Condition 11.8 of the EPA Licence.

Action Required:

Submit AER for 2024 without further delay.



Odour Assessment

Date of odour assessment:	31/10/2025
Start time:	09:38
Finish time:	10:14
This odour assessment was undertaken by:	Krzysztof Pniewczuk, (Inspector OEE)

As per the criteria stated above an odour assessment was undertaken in accordance with EPA Air Guidance document AG5 (Odour Impact Assessment Guidance for EPA Licensed Sites).

Due to the findings of the odour assessment it is the opinion of this Inspector that the activities occurring on the premises of f Timoleague AgriGen Limited were not in breach of Condition 5.2 of the facility's IE Licence at the time of the assessment.

EPA Air Guidance document AG5 is available online at www.epa.ie

FOLLOW-UP ACTIONS

The licensee is required to complete the actions outlined in this site visit report within the specified timeframes. Where required, the licensee shall also respond to actions specified in Compliance Investigations and/or submit a response to this site visit report via the EDEN system. The licensee shall maintain a documentary evidence, for review by the Agency, that the prescribed actions were completed within the required timeframe.

(i) Compliance Investigations

The Agency may generate a Compliance Investigation through the EDEN system and issue instructions and actions to the licensee. The licensee will receive notification when an instruction or action is issued and the licensee must respond to the actions within the Compliance Investigation within the specified timeframe.

(ii) Response to Site Visit Report

Where the licensee is requested to (or wishes to) respond to the Agency in relation to this site visit report, the licensee may select the 'Make a Response' link on the Site Visits page in EDEN where a .pdf document containing the response can be attached and submitted. The response should include details of the actions taken by the licensee to address the issues raised in this site visit report and the target completion dates. This Licensee Public Response provides the licensee with an opportunity to inform both the Agency and the public about the implementing of actions set out in the Agency site visit report. The response must be submitted **within 21 calendar days** of the issue date of this site visit report.

(iii) Publication of Reports

This site visit report will be published on the EPA's website, www.epa.ie, 30 calendar days after the site visit report issue date.

Any licensee response to this site visit report will be published on the EPA's website simultaneously (i.e. 30 calendar days after the site visit report issue date).

Please note that licensees are required to comply with the conditions of the licence at all times, and where non-compliance occurs, compliance must be restored within the shortest possible time. These actions will be verified during subsequent Agency visits. Please quote the above Inspection Reference Number in any correspondence in relation this Report.