

Compliance Assessment Report CAR_NRW0048290

Permit being assessed: BU77661C.

For: Bryn Posteg Landfill , **held by:** Sundorne Products (Llanidloes) Ltd

At: Bryn Posteg Landfill Site Tylwch Road , Llanidloes, Powys, SY18 6JJ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 07/04/2025 between 13:30 and 16:00.

Parts of permit assessed: Site inspection .

NRW Lead Officer: Jamie Blythin, accompanied by Paul Challender.

Report sent to: Site Manager, Site Manager , on 15/05/2025.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3F - Installations - Emissions and monitoring - Pests	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.1.1

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
1	4

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
IR3B	Action 1- Confirm in writing the reference number of the gas well (GW325/GW325B) that recorded values up to 10% gas during the inspection.	16/06/2025
IR3B	Action 2- Investigate high PSEs near the unmarked well discussed above and implement suitable remediation measures.	16/06/2025
IR1A	Action 3- Ensure the unmarked well is labelled.	16/06/2025
IR3B	Action 4- Operator to complete a surface emissions survey and provide NRW with results/ report. This survey should include all landfill gas infrastructure and temporary / permanently capped areas. Where point source emissions (PSEs) are identified, operator to implement suitable remediation measures to reduce PSEs as far as reasonably practicable. Operator to continue providing NRW with monthly FID / emissions progress reports.	01/07/2025

Compliance criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Inspection Report (CAR) follows a routine, unannounced site inspection at Bryn Posteg Landfill.

Before carrying out the site inspection, NRW officers completed offsite odour monitoring at the following locations: A470, Newchapel, Llidiartywaun, Tylwch, Llanidloes and around the perimeter of the site. Very faint, transient landfill gas odours (1/6) were observed near the landfill site entrance. These were localised and not observed at any other locations.

Officers walked across the fields to the SW of the landfill site where litter was observed during the previous site inspection (see CAR_NRW0046535). On this occasion, the area was clear except for minimal, small pieces of litter.

On arriving at site, officers were met by the Environmental Technician and were later joined by the Site Manager. Both accompanied NRW officers during the inspection.

Following the landfill gas audit completed by NRW's Landfill Emission Reduction Project (LERP) Team in 2024, the operator engaged environmental consultants to complete a

surface emissions survey using a Flame Ionisation Detector (FID) in November 2024 (see document *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024 -Document Reference: 6458-CAU-XX-XX-RP-V-0303.A0.C1 - December 2024*).

As stated in the report referenced above, a total of 47 point source emissions (PSEs) of methane were identified across the site and corresponding remediation measures were proposed. The operator has provided NRW with progress reports (*Bryn Posteg 2024 FID progress*) which detail the measures implemented to address the PSEs.

During this inspection, officers used a calibrated Gazomat Inspectra TDL unit to survey fugitive emissions from a selection of PSEs where remediation measures had been completed. A methane emissions survey sheet was completed separately and should be read in conjunction with this CAR.

A background reading of 2.2 ppm was recorded in the site car park before completing the inspection.

At GW214, the NRW officers recorded values up to 7ppm. The *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024* states that GW214 recorded a value of >10,000 ppm in November 2024. Remediation measures have been implemented as referenced in *Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) 'Well Head slipped, causing flex seal to open. Head has been repositioned and flex seal tightened. Status-Complete.'*

At LCP1, the NRW officers recorded values up to 400ppm around the base of the well. In November 2024, values of >10,000 ppm were recorded. Remediation measures have been implemented as referenced in *Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) 'Capped with cap-end and flex seal. Status-Complete.'*

At GW99, the NRW officers recorded values up to 7 ppm. In November 2024, values of >10,000 ppm were recorded. Remediation measures have been implemented as referenced in *Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) 'Well Head slipped, causing flex seal to open. Head has been repositioned and flex seal tightened. Status-Complete.'*

At GW55, the NRW officers recorded a value of 2.2 ppm.

At GW311, the NRW officers recorded values up to 16,000 ppm. In November 2024, values of >10,000 ppm were recorded. The *Bryn Posteg 2024 FID progress report (received by NRW 31/03/25)* states that 'Well is located in active tipping area where waste has been added. This should decrease emissions. Following cell completion, capping should prevent all emissions. Status-On hold.'

At 9D, the NRW officers recorded values up to 70 ppm. In November 2024, values of >10,000 ppm were recorded. Remediation measures have been implemented as referenced in *Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) 'New well head fitted. Status-Complete.'*

At GW325A, the NRW officers recorded values up to 5% gas and there was a strong odour

of landfill gas (4/6) observed. This PSE was not referenced in *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024*. However, GW325A was included in the Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) which states that the following measures will be taken 'Emissions from base. Well identified as GW325A. Well in operational area, base to be covered in compacted clay to stop basal emissions. Status-To be completed this week.'

At GW325, the NRW officers recorded values up to 10% gas and there was a strong odour of landfill gas (4/6) observed. In November 2024, values of >10,000 ppm were recorded. In the *Bryn Posteg 2024 FID progress report (received by NRW 31/03/25)*, the operator makes no reference to GW325 but does refer to GW325B. This is confusing as *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024* refers to GW325. On site, the reference number of this well which recorded emissions up to 10% gas was checked with both the Environmental Technician and Site Manager who stated it was GW325.

Action 1- Confirm in writing the reference number of the gas well (GW325/GW325B) that recorded values up to 10% gas during the inspection.

The Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) states that the following measures have been implemented on GW325B 'Emissions from base of well. Well has been covered with clay and waste. Status- Complete.'

Very Strong landfill gas odours (5/6) were detected near an unmarked gas well in the SW area of the site. NRW officers were unable to use the Gazomat to get an emission value near this well as methane levels rose rapidly before the alarm was triggered on one of the officer's personal gas safety alarms and it was not safe to continue the survey near this well. This was discussed with both the Environmental Technician and Site Manager who were present when the gas alarm was triggered.

Action 2- Investigate high PSEs near the unmarked well discussed above and implement suitable remediation measures.

Action 3- Ensure the unmarked well is labelled.

At GW 326, the NRW officers recorded values of 2.2 ppm. This well was not referenced in *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024*. However, GW326 was included in the Bryn Posteg 2024 FID progress report (received by NRW 31/03/25) which states that the following measures have been implemented 'Milton removed, biscuit installed with upstand. Surrounded with clay. Status- Complete.'

NRW officers raised concerns with GW326 during a site inspection carried out on 05/02/25 (see CAR_NRW0046535) where strong landfill gas odours were detected near the well which was lysing at an angle between approximately 45 and 60 degrees (suggesting it has been struck/ damaged by a vehicle on site or sunk due to increased subsidence, resulting in increased emissions from the well).

During this inspection, NRW officers saw no evidence that the remediation measures stated in the Bryn Posteg 2024 FID progress report (received by NRW 31/03/25), had been

completed as GW326 was still lying at an angle between approximately 45 and 60 degrees and it did not look anything like the photographs presented in the progress report. This was raised with the operator who stated that this had been submitted in error for GW326.

Following this inspection, the operator provided NRW with an updated Bryn Posteg 2024 FID progress report (received by NRW 30/04/25) which states that the following measures have been implemented at GW326 'Surrounded with clay. And flex seal tightened. The NRW visit showed high emissions from base still. Waste and clay around well has been excavated (~6ft) and well has been surrounded with compacted dredgings. Status- Complete.'

At GW 67, the NRW officers recorded values up to 700 ppm. This well was not referenced in *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024* or included in any of the Bryn Posteg 2024 FID progress update reports.

NRW acknowledges that progress has been made to address the PSEs identified in the *Bryn Posteg Landfill Site Potters Waste Management Surface Emissions Monitoring 2024 Surface Emissions Report 2024*. However, during this inspection, PSEs were identified that were not included in the 2024 surface emissions report and elevated methane emissions were recorded in some gas wells, despite remediation works being completed. NRW considers this a breach of permit condition 3.1.1 and a non-compliance score has been applied (IR3B-Emissions of substances not controlled by emission limits-C3).

Action 4- Operator to complete a surface emissions survey and provide NRW with results/report. This survey should include all landfill gas infrastructure and temporary / permanently capped areas. Where point source emissions (PSEs) are identified, operator to implement suitable remediation measures to reduce PSEs as far as reasonably practicable. Operator to continue providing NRW with monthly FID / emissions progress reports.

Large areas of the site currently do not benefit from permanent/ temporary capping. The operator provided NRW with an updated capping and phasing plan-document reference 3456-CAU-XX-XX-DR-S-1818p02-on 02/05/25. We will comment on this plan in a separate CAR.

There was far less litter present within the boundary of the site compared to the previous site inspection on 05/02/25 (see CAR_NRW0046535). Following the previous inspection, the operator implemented a 'litter tracking' spreadsheet and it was evident on this inspection that litter picking is taking place.

The operator has brought in additional daily cover material that was stored on site.

During the inspection, seagulls were visible flying above site. Noise-scaring equipment was in use during the inspection.

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If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

If your assessment result in Section 1 is suspended, what does this mean?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.