

Compliance Assessment Report CAR_NRW0049235

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: Report/Data Review,

Reason: Routine.

On: 28/08/2025.

Parts of permit assessed: Q2 Monitoring Returns.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Site Manager, Site Manager, on 04/09/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	C3 Minor	3.7.1 (a)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7 (d)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7 (d)

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

Total non-compliances recorded	Total non-compliance score
3	12

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
IR3A(1)	Confirm which monitoring point the 2.1mg/l ammoniacal nitrogen result was reported from by 12th September 2025	12/09/2025
IR2I	Pump has already been replaced	Already

Criteria	Action needed	Complete by
		completed
IR3A(2)	Provide an update to NRW of the leachate reduction programme in conjunction with the gas levels from the external monitoring boreholes.	30/09/2025
IR3A(2)	As per Action (3)	30/09/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This Compliance Assessment Report (CAR) has been raised following the assessment of the Q2 (April to June) 2025 monitoring returns.

Emissions to water

Quarterly monitoring of emissions to surface water (P1 & P2) were reported as per Permit Condition 3.7.1 (b), Schedule 3, Table S3.3. All parameters were compliant with the emission limit values (ELV).

Emissions to sewer

Quarterly monitoring of treated leachate was reported as per Permit Condition 3.7.1 (b), Schedule 3, Table S3.4. All parameters were reported to be compliant except for ammoniacal nitrogen and Chemical Oxygen Demand (COD). Ammoniacal nitrogen was reported as 299mg/l above the limit of 150 mg/l and COD was reported as 1170 mg/l above the limit of 1000mg/l when they were tested on 27th June 2025. A schedule 5 notification was submitted that stated the following;

Leachate was held in the treatment lagoon until compliance was achieved and the effluent discharged. This occurred on 29/06/25 where COD had dropped to 636mg/l, Ammonia was 108.8mg/l and pH was 6.7.

As the leachate was not released in exceedance of the ELV, this does not represent a breach of the ELV.

Leachate Levels

Quarterly monitoring of leachate levels were reported as per the requirements of Permit Condition 3.7.1(a), Schedule 3, Table S3.1 and Permit Conditions 4.2.3 (a, b & c), Schedule 4, Table S4.1. pH was also reported as per the requirements of this permit condition and Table S3.9.

The leachate level at monitoring point RMLP9D was 1.02m, marginally above the ELV of 1m above sump base. A Schedule 5 notification was submitted which stated the following;

A pump stopped pumping causing leachate head to rise just above the elv of 1m. The pump was replaced immediately and the leachate level dropped below 1m the following day.

Score: IR2I - Leachate levels. Permit Condition 3.1.2. Score C3.

As the pump was replaced, no further actions are required.

Groundwater

Quarterly monitoring of groundwater was reported as per the requirements of Permit Condition 3.7.1(c), Schedule 3, Table S3.5 & S3.10 and Permit Conditions 4.2.3 (a, b & c), Schedule 4, Table S4.1. All parameters were reported to be compliant except for ammoniacal nitrogen which was reported as 2.1 mg/l but taking into account 12.7% uncertainty this is below the ELV.

Action

Confirm which monitoring point the 2.1mg/l ammoniacal nitrogen result was reported from by 12th September 2025.

Landfill Gas in external monitoring boreholes

Monthly monitoring of landfill gas in external monitoring boreholes was reported quarterly as per the requirements of Permit Condition 3.7.1(d), Schedule 3, Table S3.6 and Permit Conditions 4.2.3 (a, b & c), Schedule 4, Table S4.1.

The limits for these parameters are below;

Methane - 1%v/v

Carbon Dioxide - 1.5%v/v

Oxygen – no limit

Methane was reported as 78%v/v at borehole G12 and Carbon Dioxide as 27%v/v at borehole G24. Both parameters are significantly above the ELV's. A schedule 5 notification was submitted stating as follows:

Perimeter Gas is a long-standing issue at Bryn Posteg and was flagged during the LERP Audit conducted by NRW. We are currently working to the Landfill Gas action Plan

submitted to NRW on 06/12/24.

Methane at 78%v/v has generated a score:

Score: IR3A - Emissions to water, air or land. Permit Condition 3.1.7(d), Schedule 3, Table S3.6. Score C3.

Carbon Dioxide at 27%v/v has generated a score:

Score: IR3A - Emissions to water, air or land. Permit Condition 3.1.7(d), Schedule 3, Table S3.6. Score C3.

An action was set in CAR_NRW0049181 with a deadline date of **30th September 2025**:

- Provide an update to NRW of the leachate reduction programme in conjunction with the gas levels from the external monitoring boreholes.

This action is repeated for the Q2 breach of the ELV's.

The result for the atmospheric pressure was not provided this quarter and a Schedule 5 notification was submitted stating the following:

Since the original GA5000 has been replaced with a GFM436 gas analyser, the method for recording atmospheric & differential pressure has changed. We were not aware of this during this quarter.

The site has identified the following action to prevent re-occurrence:

Training on how these pressures are recorded will be provided to the relevant staff to ensure these figures are available moving forward.

Landfill Gas - other monitoring requirements

The quarterly requirements as stipulated in Table S3.8 and Table S4.1 were reported as required.

Particulate matter in ambient air

Particulates were monitored and reported as per the requirements of Permit Condition 3.7.1(e), Schedule 3, Table S3.11 and Permit Conditions 4.2.3 (a, b & c), Schedule 4, Table S4.1. All parameters for all required monitoring points were reported as compliant.

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.