

## Compliance Assessment Report CAR\_NRW0050187

**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:** 08/12/2025 between 14:00 and 16:30.

**Parts of permit assessed:** See Report.

**NRW Lead Officer:** Kathryn Bradshaw, accompanied by Jamie Blythin.

**Report sent to:** Site Manager, Site Manager, on 22/12/2025.

### 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	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C2 Significant	3.1.2
IR2G - Installations - Operations - Landfill engineering (only applicable to landfill)	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	35

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)	Investigate the cause of the elevated ammonia and suspended solids at discharge point P2 and report back to NRW by 31st January 2026.	31/01/2026
IR3A(1)	Investigate the cause of the elevated ammonia and suspended solids at discharge point P2 and report back to	31/01/2026

Criteria	Action needed	Complete by
	NRW by 31st January 2026.	
IR2G	Ensure all capping works comply with the approved CQA Plan issued by Caulmert (Document Reference: 3761.CAU.XX.XX.SP.Y.7700.A(5) February 2022)	24/12/2025

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 Assessment Report (CAR) has been raised following a routine unannounced inspection. The main purpose for the visit was to follow up on the issue raised during the last inspection when high suspended solids were being discharged from monitoring point P1 and also to inspect how the capping works were progressing.

Prior to arriving on site olfactory monitoring was undertaken at Llanidloes town centre, Bryn Du Road, B4518 and around the perimeter of the site. No offsite landfill gas odours were detected.

The site manager was present at the time of the inspection and authorised us to walk around the site unaccompanied. The new CQA engineer that has been appointed to supervise the capping works was not present on the day of the inspection.

Sirius Group Ltd had communicated to NRW that a clay bund would be installed along with hay bales to control the level of suspended solids that had been discharged at P1 surface water point (see CAR\_NRW0050076). This area was inspected and although no machinery was using the roadway on the day of the visit the clay bund had not been installed. The hay bales had just been delivered but not moved to the ditch that leads to P1 discharge point. A 2 litre sample was taken from P1 surface water discharge. The site manager was asked if he wanted to witness us taking the sample but he declined. This sample was later split into two 1 litre bottles and one of these was given to the site manager.

The result for suspended solids was 5520 mg/l significantly exceeding the permitted limit of 50 mg/l.

The result for ammonia was 1.46 mg/l exceeding the permitted limit of 0.25 mg/l.

Both of these breaches were previously scored in CAR\_NRW0050076 and as these breaches are in the same quarter they will not be scored again.

The flow of water to P1 was less than the previous visit however large volumes of suspended solids could again be seen in the drainage ditch, surface water lagoons and at

the discharge point as shown in the photos below;

Ditch leading to P1



Track above drainage ditch and P1 discharge



Employees of BD Contracts met us in the Western area of the site to explain that they had not yet installed the clay bund due to adverse weather conditions but they confirmed that once it was complete they would forward on photos.

Haybales were placed along the edges of the haul road and photographs were submitted to

NRW on 15/12/25.

A transient moderate landfill gas odour could be detected in the Western side of the site adjacent to Phase 1, Phase 3 A and Phase 3 B.

Leachate was running down a slope to the MRF area into a sump. The site manager stated that this leachate was being pumped back up the site to the leachate treatment lagoons. See photos below;



A 2 litre sample was taken from P2 discharge point and later spilt into two 1 litre bottles and a sample given to the site manager who declined to witness both samples being split.

The result for suspended solids was 1580 mg/l above the permitted limit of 50 mg/l and attracts a score:

IR3(A)(1) Emissions to water C3

The result for ammonia was 10.9 mg/l significantly above the permitted limit of 0.25 mg/l and attracts a score:

IR3(A)(1) Emissions to water C2

### Action

Investigate the cause of the elevated ammonia and suspended solids at this discharge point and report back to NRW by 31st January 2026. Further scores may be applied

following a review of the investigation.

Significant progress has been made on site installing the plastic capping on the previously active tipping cells. NRW has concerns about the change and absence of the CQA engineer to supervise the capping works to ensure it complies with the approved CQA plan.

**Action**

Ensure all capping works comply with the approved CQA Plan issued by Caulmert (Document Reference: 3761.CAU.XX.XX.SP.Y.7700.A(5) February 2022)

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](mailto: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](mailto: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.