

Compliance Assessment Report CAR_NRW0049850

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: 28/11/2025.

Parts of permit assessed: Q3 Monitoring Returns.

NRW Lead Officer: Kathryn Bradshaw.

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	3.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.5
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7
IR4C - Installations - Information - Notification	C3 Minor	4.3.2
IR1A - Installations - Management - General Management	C3 Minor	1.1

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

Total non-compliances recorded	Total non-compliance score
8	32

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)	See CAR_NRW0050187	30/01/2026
IR3A(1)	2. See CAR_NRW0050187. 3. Ensure on-site testing equipment is calibrated and maintained to ensure it provides representative results. 4. Testing results should be reported as per laboratory test results in the future	30/01/2026
IR3A(1)	See CAR_NRW0050187	31/01/2026
IR3A(1)	Provide the data to demonstrate that the leachate ELV's were complied with prior to discharge to sewer.	30/01/2026
IR3A(1)	Investigate the cause of the elevated ammonia at W5 and report back to NRW	30/01/2026
IR3A(2)	Provide an action plan with completion dates to address the high perimeter gas levels	27/03/2026
IR3A(2)	Provide an action plan with completion dates to address the high perimeter gas levels	27/03/2026
IR4C	Ensure all breaches are notified to NRW using the Schedule 5 notification form in the future	30/01/2026
IR1A	Operator to manage and operate the activities in accordance with the site's written Environmental Management System (EMS). Compliance with this action will be reviewed in the future.	05/12/2025

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.

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 Q3 (July to September) 2025 monitoring returns.

The raw data for the emissions monitoring for Q3 2025 was requested on 30th September 2025 instead of the reporting forms.

The following raw data was submitted on 28th October 2025;

Laboratory Report, certificate of analysis number 11224 for air emissions

Laboratory Report, certificate of analysis number 10587 for surface water emissions, leachate and treated leachate

Laboratory Report, certificate of analysis number 10930 for surface water emissions, leachate, treatment lagoon and settlement lagoon

Laboratory Report, certificate of analysis number 11162 for surface water emissions, groundwater monitoring, leachate and treated leachate

Gas monitoring data in spreadsheet format for July, August and September plus perimeter gas trends for July, August and September

Handwritten sheets for treated leachate monitoring, monitoring of P1 and P2 surface water emission points and leachate head height.

On 3rd November 2025 the raw data was submitted for groundwater dips.

No Schedule 5 notifications were submitted. NRW requested these for any breach of emission limits on 30th September 2025 and were submitted on 3rd and 4th November 2025.

Emissions to water

P1

Quarterly monitoring of emissions to surface water (P1 & P2) were reported as per Permit Condition 3.7.1 (b), Schedule 3, Table S3.3.

On emission point P1 there was a suspended solids breach on 31/07/25 of 1022 mg/l. The limit for suspended solids is 50 mg/l.

Score: IR3A(1) Surface Water discharge Permit Condition 3.1.1. Score C3

The pH limit was breached on 26/09/25 with a result of 5.8. Even with the uncertainty of 2.6% this is still a slight breach of the permitted limit. The limit for pH is 6 to 9.

Score: IR3A(1) Surface Water discharge Permit Condition 3.1.1. Score C3

No schedule 5's were received for these breaches.

Action

1. See CAR_NRW0050187

P2

On emission point P2 there was a suspended solids breach on 31/07/25 of 62 mg/l and on 04/09/25 of 286 mg/l. The limit on suspended solids is 50 mg/l.

Score: IR3A(1) Surface Water discharge Permit Condition 3.1.1. Score C3

There was an ammonia breach on 25/09/25 on emission point P2 of 0.53 mg/l. The limit for ammonia is 0.25 mg/l.

Score: IR3A(1) Surface Water discharge Permit Condition 3.1.1. Score C3

A Schedule 5 notification was received on 4th November 2025 which stated the following;

We believe higher than usual suspended solids is likely due to the dry period prior, with solids being washed away by the rain in the following weeks, causing the high reading.

The cause of elevated ammonia in September is unknown. Believe that a bund separating leachate and surface water may have been damaged. Bunds that separate surface water and leachate onsite have been re-enforced with soils following this result.

The Schedule 5 notification did not reference the suspended solids breach on 04/09/25 of 286 mg/l. This result was provided in the laboratory report certificate number 10930.

Actions

2. See CAR_NRW0050187.
3. Ensure on-site testing equipment is calibrated and maintained to ensure it provides representative results.
4. Testing results should be reported as per laboratory test results in the future

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 suspended solids. Ammoniacal nitrogen was reported as 180mg/l above the limit of 150 mg/l even with a 12.7% uncertainty means that this is still in breach of the limit. Suspended solids was reported as 1613 mg/l above the limit of 500 mg/l. pH was reported as per laboratory report, certificate number 11162 as 5.8. The limits for pH are 6 to 9.

The Schedule 5 notification stated the following;

There was no effluent discharged during this time due to a fault with the DAF plant feed pump.

Following the repair, suspended solids cleared and treated effluent was retested with results of Ammonia: 148, and COD: 846 with results continuing to improve to COD: 808 & Ammonia: 140.6 on 29/08/25.

No data has been provided which demonstrates compliance with the treated leachate ELV's before the leachate was discharged.

Action

5. Provide the data to demonstrate that the leachate ELV's were complied with prior to discharge to the sewer by 30th January 2026.

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. All parameters were reported to be compliant.

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 monitoring point W5 where ammonia was reported to be 3.8 mg/l above the limit of 2mg/l which is still above the limit taking into account the 12.8% uncertainty.

Score: IR3A(1) Groundwater Permit Condition 3.1.5. Score C3

A Schedule 5 notification was received on 4th November 2025 which stated the following;

The cause of elevated Ammonia in W5 is unknown at this time.

An investigation will be conducted to determine the cause with results forwarded to NRW once complete.

Action

6. Investigate the cause of the elevated ammonia at W5 and report back to NRW by 30th January 2026.

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 81.5%v/v and Carbon Dioxide as 32.8%v/v at boreholes G12 and G22. 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. The site is undergoing capping works, following the completion of these works.

Methane at 81.5%v/v has generated a score:

Score: IR3A(2) - Emissions to air. Permit Condition 3.1.7(d), Schedule 3, Table S3.6. Score C3.

Carbon Dioxide at 32.8%v/v has generated a score:

Score: IR3A(2) - Emissions to air. Permit Condition 3.1.7(d), Schedule 3, Table S3.6. Score C3.

The Schedule 5 notification does not state any corrective actions to address these breaches of ELV's and is insufficient.

Action

7. Provide an action plan with completion dates to NRW to address the high perimeter gas levels.

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.

Notifications

Schedule 5 notifications were not received for some of the ELV breaches and this generates a score:

Score: IR4C - Notifications. Permit Condition 4.3.2. Score C3.

General Management

Due to the failure to notify of some breaches of ELV's, failure to investigate and implement corrective actions and not reporting breaches identified on laboratory results NRW considers the root cause to be general management. This is a breach of permit condition 1.1.1 (IRA-General Management) and a C3 non-compliance score has been applied.

Action

8. Operator to manage and operate the activities in accordance with the site's written Environmental Management System (EMS). Compliance with this action will be reviewed in the

future.

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.