

Compliance Assessment Report CAR_NRW0050076

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: 24/11/2025 between 13:15 and 16:30.

Parts of permit assessed: See report.

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

Report sent to: Site Manager, Site Manager, on 17/12/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C2 Significant	1.1.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C2 Significant	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR2H - Installations - Operations - Waste acceptance (only applicable to landfill)	C3 Minor	2.7.1
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
5	74

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
IR1A	Awareness , training and adequate supervision of contractors working on site needs to be made a priority to ensure the capping and restoration works do not cause environmental harm, amenity issues and are compliant with the agreed CQA	05/12/2025
IR3A(1)	As per action 1	12/12/2025
IR3A(1)	As per Action 1	12/12/2025
IR3A(1)	Investigate and report back to NRW what the source of the elevated ammonia is and what corrective actions will be implemented to prevent re-occurrence by 30th January 2026	30/01/2026
IR2H	Provide a copy of the consignment note for the removal of the fridge	12/12/2025
IR3A(1)	Provide an up to date drainage plans of the site to include all permitted areas; Landfill & Composting - EPR/BU7766IC MRF waste operation - EPR/UP3995CV	19/12/2025

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 pre-arranged site inspection primarily to view how the capping works were progressing but also to investigate reports we had received about odours and water pollution.

Prior to arriving on site NRW officers conducted off site olfactory monitoring at the following locations: Llanidloes Town, Bryn Du Road, B4518 and around the perimeter of the site. Strong (4/6) gas and hydrogen sulphide odours were detected at the site entrance but were localised and landfill gas odours were not detected at any other locations. Capping works were ongoing at the time of the visit and there may be times the gas on the site is not always under full abstraction while the capping is being installed.

NRW received reports (WIRS 2510410, 2510252) of water pollution suspected to originate from the site. NRW officers visited the location of the reported pollution prior to arriving on site. A sample was taken and tested for ammonia with a result of <1mg/l.

We were met on site by the Site Manager and the current Technically Competent Manager

(TCM). We did not meet or see the designated CQA engineer for the capping and restoration works during this visit.

The capping and restoration works are now being managed by Sirius Group Ltd, although no representatives from this company were on site at the time of the visit. The company contracted to undertake the works, BD Contracts Ltd were on site and continuing the capping works which have made progress since the last site inspection. Soils were being moved from an adjacent field to provide a regulating layer over cells 9C, D and E.

Water samples were taken from the two surface water discharge points referenced in the permit, P1 and P2. The samples were split, two provided to the site manager and two were sealed in evidence bags to be tested at NRW's laboratory. This process was undertaken in the presence of the site manager and TCM.

The result for suspended solids at P1 was 7050mg/l which is a significant breach of the permitted limit of 50 mg/l and has the potential to cause significant environmental harm to the receiving waters.

This is in breach of permit condition 3.1.2 and attracts a score of C2 (IR3 A(1))

The result for ammoniacal nitrogen at P1 was 1.92 mg/l, significantly above the permitted limit of 0.25 mg/l.

This is in breach of permit condition 3.1.2 and attracts a score of C3 (IR3 A(1))

The COD result for P1 was 206 mg/l indicating a high pollution loading at this discharge point.

During the site walkover to the discharge point P1 to the East of the site, heavy plant were moving soils from the adjacent field. This had significantly churned up the track that leads down to the surface water lagoons, as can be seen below;



The run off from this track was discharging into a nearby lagoon and channel which leads directly to the P1 discharge point;

Lagoon



Channel leading to P1



Discharge Point P1



No efforts had been made by the site to attempt to remediate this run off from the movement of heavy plant to and from the adjacent field. Suspended solids can create significant harm to streams and rivers. The P1 emission point discharges into the Nant Y Bradnant. There appeared to be a lack of structured supervision and oversight of the capping works at the time of the visit.

NRW considers this a breach of condition 1.1.1 (IR1A-General Management) and a C2

non-compliance score has been applied.

Following the visit communications have been received from Sirius Group to state that a solid clay bund will be installed alongside hay bales in the discharge ditch.

The sample results for discharge point P2 were all compliant except for ammoniacal nitrogen which was 0.5 mg/l, which is above the permitted limit of 0.25 mg/l.

This is in breach of permit condition 3.1.2 and attracts a score of C3 (IR3 A(1))

The elevated ammonia level at discharge point P2 could potentially be linked to the leachate issues raised previously and discussed in this CAR below. The leachate management of the site needs to be addressed as soon as possible to prevent any adverse environmental impacts. Actions to address this were raised in CAR_NRW0049852.

Action

Investigate and report back to NRW what the source of the elevated ammonia is and what corrective actions will be implemented to prevent re-occurrence by 30th January 2026.

When walking around the site NRW officers observed a leachate breakout in the same location (Phase 9A) as during the previous site inspection (CAR_NRW0049852) as can be seen below;



Further leachate pools were present at the toe drains of Phase 9D & 9E and run off could be seen down to the MRF area;



Run-off to MRF area



This issue was raised during the last site inspection (CAR_NRW0049852) and was scored with actions set. The deadline for these actions is **16th January 2026**.

Discussions were held on site about site drainage and containment, however it was not clear where the MRF area drains to.

Action

Provide an up to date drainage plans of the site to include all permitted areas;

Landfill & Composting - EPR/BU7766IC

MRF waste operation - EPR/UP3995CV

by 19th December 2025.

The tyres that were stored along the perimeter fence have now been moved to the MRF area and are awaiting removal to a suitably permitted site.

The site provided an update after the visit on the timelines for removal and all tyres should be removed by Q1 2026.

During the site walk over strong (4/6) gas and hydrogen sulphide odours were detected on site adjacent to cells 9A and 9B, corresponding to the location of the off-site odours.

Actions were set in CAR_NRW0049852 to address the management of landfill gas of the site to ensure adequate infrastructure is in place to capture gas and prevent any off-site odour impacts.

During the inspection NRW officers noticed a fridge that had been deposited in a depression in the landfill in the area of Phase 4;



The site cannot accept this waste type which is in breach of permit condition 2.7.1. and a C3 scored has been applied. The fridge was removed from the area whilst NRW officers were on site.

Action

Provide a copy of the consignment note for the removal of the fridge by 12th December 2026.

General Management

NRW considers the root cause of the high suspended solids in P1 discharge and the deposit of non-permitted waste to be general management of the site and is in breach of

permit condition 1.1.1 and a C2 score has been applied.

We are considering our enforcement response to the category 2 score.

Awareness, training and adequate supervision of contractors working on site needs to be made a priority to ensure the capping and restoration works do not cause environmental harm, amenity issues and are compliant with the agreed CQA. NRW will continue to review these issues during future site inspections.

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.