

## Compliance Assessment Report CAR\_NRW0050676

**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:** 02/02/2026 between 13:55 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 19/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3C - Installations - Emissions and monitoring - Odour	C3 Minor	3.3.1
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
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C2 Significant	3.1.2

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

Total non-compliances recorded	Total non-compliance score
4	43

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
IR3C	See actions in Schedule 1 of EPR Regulation 36 notice served 12th February 2026	27/03/2026
IR3A(1)	Operator to monitor suspended solids during the next quarter	31/03/2026

Criteria	Action needed	Complete by
	and if breaches above ELV's persist then implement further suitable measures to comply with ELV's	
IR3A(1)	See actions in Schedule 1 of EPR Regulation 36 notice served 12th February 2026	27/02/2026
IR3A(1)	See actions in Schedule 1 of EPR Regulation 36 notice served 12th February 2026	27/02/2026

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 an unannounced site inspection on 2<sup>nd</sup> February 2026.

Prior to arriving on site NRW officers conducted off site olfactory monitoring at the following locations: Llanidloes Town Centre, Rhos Y Maen Isaf, Bryn Du Road, B4518 and around the perimeter of the site. A distinct (3/6) landfill gas odour was detected past the site entrance and further south along the B4518. A distinct (4/6) landfill gas odour was detected in one of the fields located to the West of the site. No odours were detected at any of the other locations.

This constitutes an off -site impact of odour pollution and attracts a score;

#### **IR3C -Odour- Permit condition 3.3.1. Score C3**

##### **Action 1.**

See Steps to be taken in Schedule 1 of EPR Regulation 36 Notice.

However after the site inspection officers again conducted olfactory monitoring past the site entrance and south along the B4518 and no odour was detected

Gas engineers were on site working at the time of the inspection.

The site manager accompanied us around the site and they have made significant progress on permanent capping of Phase 9 cells. The site has begun to place restoration soils on the cap.

Silt fencing has now been installed along the lower haul road adjacent to the surface water discharge point P1 to prevent solids entering this discharge point. A 2 litre sample was taken from this discharge point and then split into 2 x 1 litre bottles, witnessed by the site

manager who was provided with a 1 litre sample.

The result for suspended solids was 90 mg/l above the permitted limit of 50 mg/l and attracts a score:

### **IR3(A)(1) Emissions to water. Permit Condition 3.1.2. Score C3**

#### **Action 2**

Operator to monitor suspended solids during the next quarter and if breaches above ELV's persist then implement further suitable measures to comply with ELV's by 31st March 2026.

The result for ammonia was 3.27 mg/l above the permitted limit of 0.25 mg/l and attracts a score:

### **IR3(A)(1) Emissions to water. Permit Condition 3.1.2. Score C3**

#### **Action 3**

See Steps to be taken in Schedule 1 of EPR Regulation 36 Notice.

The site no longer uses this lower haul road and will be installing a new alternative access road to the neighbouring field adjacent to the leachate treatment lagoons to transport restoration material.

Leachate breakouts were again visible along the track at the base of cells 9C/9D and can be seen in the photos below:

#### Track at base of Phase 9C/9D



#### Base of Phase 9D



The cause of the leachate breakouts has not been investigated and the action in CAR\_NRW0049852 has not been adequately addressed. This is being dealt with separately by way of an enforcement notice.

We viewed the balancing lagoon which had plenty of freeboard and also the treatment lagoon which was operational. The piles of tyres that had been stored here for some time has been significantly reduced.

We inspected the MRF area and it appeared that the site had remediated the leachate run-off from the previous inspection by installing clay bunds and emptying out leachate that had accumulated at the base of 9D. There was still a pool of standing water at the base of Phase 9D. It was not clear if this was surface water run-off or leachate.

The water discharging into the MRF area appeared to be clean surface water. The intention is to clear the ditches of heavy silt deposits either side of the North West haul road and then place hay bales in the ditches to prevent suspended solids entering P2 monitoring point and exceeding the emission limits.

A 2 litre sample was taken from P2 discharge point and split into 2 x 1 litre bottles witnessed by the site manager.

The result for suspended solids was 22mg/l below the permitted limit of 50 mg/l.

The result for ammonia was 25.4 mg/l significantly above the permitted limit of 0.25 mg/l and attracts a score:

### **IR3(A)(1) Emissions to water. Permit Condition 3.1.2. Score C2.**

This is again another significant breach of the permitted ammonia limit and an indicator that leachate is possibly entering the surface water system.

#### **Action 4**

Surface water management at the site needs addressing as soon as possible including investigating the root cause of the elevated ammonia. See Steps to be taken in Schedule 1 of EPR Regulation 36 Notice.

The site is progressing well with removing all the waste tyres that have been on site for a

number of years supplying copies of waste transfer notes when loads are removed.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

### Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [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.