

Compliance Assessment Report CAR_NRW0050697

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: 31/12/2025.

Parts of permit assessed: Q4 monitoring returns and annual review.

NRW Lead Officer: Kathryn Bradshaw.

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
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1
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 (d)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.7(d)
IR4B - Installations - Information - Reporting	C4 No impact	4.2.2
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
6	20.1

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 report	06/03/2026
IR3A(1)	See report	06/03/2026
IR3A(1)	See report	Already completed
IR3A(2)	See report	30/04/2026
IR3A(2)	See report	30/04/2026
IR4B	See report	31/01/2027

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 the assessment of the Q4 (October to December) 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.

On emission point P1 all parameters were reported as compliant with the limits in Schedule 3, Table S3.3. See CAR_NRW0050076 for breaches during this quarter.

On emission point P2 there was a suspended solids breach on 27/11/25 of 338 mg/l. The limit for suspended solids is 50 mg/l. A breach of this parameter was recorded and scored during this quarter on 08/12/25 (see CAR_NRW0050187). There was also a breach of the ammonia limit on 27/11/25 with a result of 2.1mg/l above the permitted limit of 0.25mg/l. A breach of this parameter was recorded and scored during this quarter on 08/12/25 (see CAR_NRW0050187).

A Schedule 5 notification was received on 28th January 2026 which stated the following;

Elevated Suspended solids and Ammonia at P2 have continued on from Q3 2025. Previously bunds that separate surface water and leachate onsite were re-enforced with soils. Although this has helped reduce the level of Ammonia at P2 but which has proven unsuccessful in achieving compliance.

Additional measures since December testing:

Straw Bales will be installed at 4 different areas along the haul road to prevent pollutants from leaving site and reaching P2.

The area where leachate would pool previously has been capped and sealed. This will decrease the potential for leachate to enter surface water

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 suspended solids and Chemical Oxygen Demand (COD). Suspended solids was reported as 547mg/l above the limit of 500mg/l. COD was reported as 1510mg/l above the limit of 1000mg/l.

Suspended solids at 547mg/l has generated a score;

IR3A(1) Emissions to air, water or land permit condition 3.1.2. Schedule 3 Table S3.4. Score C3.

COD at 1510mg/l has generated a score;

IR3A(1) Emissions to air, water or land permit condition 3.1.2. Schedule 3 Table S3.4. Score C3.

The Schedule 5 notification was received on 28th January 2026 which stated the following;

We believe that the reason why the results are non-conformant are due to poor practice testing by IGNE (using the sample pot to gather a sample from both Treated leachate and the leachate lagoons, collecting coagulated sludge from the bottom of the DAF discharge point when sampling which is producing unrepresentative results).

We have discussed this with IGNE management and a meeting will be held during Feb testing to discuss this further.

Action 1

Provide a written update to NRW following the meeting with INGE.

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 reported parameters were compliant with applied Emission Limit Values (ELVs).

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 reported parameters were reported to be compliant except for monitoring point W5 where ammoniacal nitrogen was reported to be 3.1 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. Schedule 3, Table S3.5. Score C3

Information was received on 30th January 2026 which stated the following:

We believe that the cause of elevated ammonia in W5 is most likely due to damaged exposed capping near W5. In December, multiple repairs were conducted on the cap to better maintain LFG and Leachate. We will continue to conduct further repairs if more damage is identified. Results in Q4 2025 of 3.1mg/l shows an improvement when compared to Q3 (3.8 mg/l) and we expect further improvements moving forward.

Action 2

Operator to evaluate results from Q1 2026 and if elevated ammonia persists at W5 then provide NRW with a written update on what measures will be implemented to ensure compliance.

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 85.4%v/v and Carbon Dioxide as 23.2%v/v at boreholes G19 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. We expect to see an improvement in these figures.

Additional infrastructure may be required to reduce perimeter gas further to compliance.

Methane at 85.4%v/v has generated a score:

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

Carbon Dioxide at 23.2%v/v has generated a score:

Score: IR3A(2) - Emissions to water, air or land. Permit Condition 3.1.7(d), Schedule

3, Table S3.6. Score C3.

The management of landfill gas has been dealt with separately by way of an enforcement notice.

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.

Emissions to air - landfill gas flare

Emissions from the landfill gas flare were monitored and reported as per the requirements of Permit Condition 3.7.1(b), Schedule 3, Table S3.2. All parameters were reported as compliant.

Annual Review

The annual monitoring review report was submitted to NRW on 6th February 2026. The report should have been submitted as per permit condition 4.2.2 by 31st January 2026. This generates a score;

IR4B Reporting. Permit condition 4.2.2. Score C4

The report contains all the information required by permit conditions in addition to the annual monitoring requirements listed in the monitoring tables.

Due to the gas engines being authorised under EPR permit RP3338TA ; a separate CAR form (CAR_NRW0050703) has been raised for the gas engine monitoring.

Paragraph 1.2.3 states that "The Site accepts municipal waste which consists of 60-70% household waste and 30%-40% commercial trade waste. The waste accepted at the site is processed in a Materials Recycling Facility and the outputs from the process are metals which are screened out and recycled. Oversized fractions (>80 mm) are landfilled, and fines (<80mm) are composted for two weeks and subsequently landfilled"

This is incorrect, as the MRF has been non-operational for several years and accepted waste is deposited directly into the active cell with no prior, on-site treatment. The site stopped accepting waste in September 2025.

Action 3

Future reviews need to depict current site operations and be submitted by the date specified in the permit.

As the MRF is inactive no-bioaerosol monitoring as per Table S3.12 is required.

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

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

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.