

Compliance Assessment Report CAR_NRW0051658

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: 30/04/2026.

Parts of permit assessed: Q1 2026 Monitoring Returns.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Site Manager, Site Manager, on 10/06/2026.

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
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.1.2
IR2I - Installations - Operations - Leachate levels (only applicable to landfill)	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	C3 Minor	3.1.2
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)
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
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
7	55

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	Implement mitigation measures to ensure compliance with all permitted limits by the end of Q3 2026 as per actions identified in response to the Regulation 36 notice.	01/10/2026
IR3A(1)	1) See actions detailed in Regulation 36 notice 2) Ensure samples that are taken are representative and accurate results are reported.	01/07/2026
IR2I	See actions detailed in the Regulation 36 notice	01/07/2026
IR3A(1)	Provide a definitive action plan with specific timelines to complete the actions by end of Q3 2026	01/10/2026
IR3A(1)	Investigate and provide actions with specific timelines to complete the actions by end of Q3 2026	01/10/2026
IR3A(2)	Implement measures to ensure compliance with permitted limits by end of Q3 2026.	01/10/2026
IR3A(2)	Implement measures to ensure compliance with permitted limits by end of Q3 2026.	01/10/2026
IR3E	For Q2, Q3 and Q4 2026 quarters provide the raw data, including any associated laboratory reports for all monitoring required to comply with the permit conditions	01/07/2026
IR2G	Provide an update on the progress of the permanent capping and anticipated completion date by 19th June 2026.	19/06/2026

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 the assessment of the Q1 (January to March) 2026 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.

P1 emission point

Ammoniacal nitrogen was reported as 0.44 mg/l above the permitted limit of 0.25 mg/l

Suspended solids was reported as 1010mg/l above the permitted limit of 50 mg/l

Breaches of these parameters have been previously scored during this quarter (see CAR_NRW 0050676)

A Schedule 5 was submitted on 28th April 2026 which stated the following;

We have spoken to professionals regarding the reduction of Ammonia levels in the Surface water at P1 & P2. This is in relation to the installation of reed beds in targeted areas with sufficient retention to adequately treat and bring Ammonia levels down to elvs. A meeting with Decus regarding this is to be held on 30/04/2026 where the best course of action will be assessed.

Ammonia at P1 was compliant during Feb and Mar with results of 0.14mg/l & 0.05mg/l respectively.

NRW laboratory results from samples taken on site during February and March for P1 emission point were;

Date	Parameter	Result	Permitted limit
02/02/2026	Ammoniacal nitrogen	3.27 mg/l	0.25 mg/l
04/03/2026	Ammoniacal nitrogen	0.307 mg/l	0.25 mg/l

This demonstrates a significant discrepancy in results.

Action

Ensure samples that are taken are representative and accurate results are reported.

P2 emission point

Ammoniacal nitrogen was reported as 8.6mg/l above the permitted limit of 0.25mg/l.

Breach of this parameter has been previously scored during this quarter (see CAR_NRW0050676).

Suspended solids was reported as 1170mg/l above the permitted limit of 50mg/l and attracts a score;

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

A Schedule 5 was submitted on 28th April 2026 which stated the following;

Suspended Solids increased significantly in March when compared to the rest of the quarter. We believe may be due to drier weather.

P2: Steps have been taken to reduce the amount of SS at P2. During heavy rain, we noticed that rainwater flowing down the site road towards P2 was high in suspended solids. To prevent this, sand bags have been installed at the bottom of the road to direct this water away from P2. In addition to this, a silt and gravel catcher has been installed into the drain located outside the offices that are next to P2. We have also cleared the P2 waterway of suspended solids. We hope these steps will help tackle the elevated SS at P2.

Breaches of suspended solids and ammonia have been recorded at the site since November 2025 with little progress on any root cause investigation or corrective actions to ensure future compliance with permitted emission limit values (elv's).

The root cause of this is the overall management of the site including investment in resources and personnel to address these issues.

This attracts a C2 score against permit condition 1.1.

Action

Implement mitigation measures to ensure compliance with all permitted limits by the end of Q3 2026 as per actions identified in response to the Regulation 36 notice issued on 11/02/26.

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.

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.

LCP6 was reported as 2.86m taken in March 2026 which is above the permitted limit of 1m and attracts a score;

IR2I - Leachate levels. Permit Condition 3.1.2. Score C3.

A Schedule 5 notification was submitted on 28th April 2026 which stated the following;

The failure of the leachate pump in LCP6 caused leachate levels to rise to 2.86 in March. This pump was changed and leachate levels dropped to 1m on 23/04/26.

A leachate audit is currently being conducted on site with results due to be provided to NRW on 30/04/2026. This audit should enable us to target areas of site where leachate is highest and improve leachate extraction around the entirety of the site.

Gas engineers will conduct checks on LCP6 more regularly moving forward to catch and

repair failing leachate pumps to help prevent LCP6 from reaching this depth.

Action

- See actions detailed in the Regulation 36 notice issued on 11/02/26.

pH was also reported as per the requirements of this permit condition and Table S3.9.

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.

Ammoniacal nitrogen was reported as 2.6 mg/l at W5 monitoring point, above the permitted limit of 2mg/l and attracts a score;

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

A Schedule 5 notification was received which stated the following;

We believe elevated ammonia levels at W5 is attributed to elevated Ammonia found in the Surface Water lagoon located closest.

We are already in the process of assessing mitigation methods such as installing Reedbeds into this lagoon to reduce the ammonia found

Action

Provide a definitive action plan with specific timelines to complete the actions by end of Q3 2026.

Cadmium was reported as 0.018mg/l at W1 monitoring point above the permitted limit of 0.0056mg/l and attracts a score;

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

A Schedule 5 notification was received which stated the following;

Elevated Cadmium is not a breach we are familiar with and has not occurred within the last few years. This breach will be discussed with Decus during the meeting held on 30/04/2026. Following this meeting, we hope to determine what caused the breach and what actions are best to take to prevent from occurring again in the future.

Action

Investigate and provide actions with specific timelines to complete the actions by end of Q3 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 75.6%v/v at borehole G22 and Carbon Dioxide as 22.6%v/v at borehole G22.

Methane at 75.6%v/v has generated a score:

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

Carbon Dioxide at 22.6%v/v has generated a score:

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

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.

As discussed in the email sent by myself on 27/03/2026. A CQA plan is being written up by Sirius to address this issue of perimeter gas for NRW approval.

NRW have yet to receive any further actions or improvements to address this issue.

Action

Implement measures to ensure compliance with permitted limits by end of Q3 2026.

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.

Data for monitoring returns

For Q2, Q3 and Q4 2026 quarters provide the raw data, including any associated

laboratory reports for all monitoring required to comply with the permit conditions.

Permanent Capping

Action

Provide an update on the progress of the permanent capping and anticipated completion date by 19th June 2026.

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.