

Compliance Assessment Report CAR_NRW0052632

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: 20/08/2026.

Parts of permit assessed: Q2 Monitoring returns.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Site Manager, Site Manager, on 20/08/2026.

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	3.1.2
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.7.5
IR1A - Installations - Management - General Management	C3 Minor	1.1
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)
IR2K - Installations - Operations - Landfill gas management (only applicable to landfill)	Action only (X)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
6	24

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)	1. Comply with the limits as per Regulation 36 notice issued on 11/08/26	31/12/2026
IR3E	2. Submit a plan to repair or replace LCP7 and RMLP9D with suitable timelines for completion	30/09/2026
IR1A	2. Submit a plan to repair or replace LCP7 and RMLP9D with suitable timelines for completion	30/09/2026
IR3A(1)	3. Continue to investigate how ammonia is leaching from the surface water lagoon into groundwater and forward the proposal for the installation of reedbeds to NRW by 30th September 2026.	30/09/2026
IR3A(2)	4. Comply with the limits as per Regulation 36 notice issued on 11/08/26	31/12/2026
IR3A(2)	4. Comply with the limits as per Regulation 36 notice issued on 11/08/26	31/12/2026
IR2K	5. An assessment of air ingress into the system shall be undertaken as per Table S3.8	31/12/2026

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 Q2 (April to June) 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. However only 1 sample was taken during this quarter which was P2 on 30/04/26. The site stated the discharge points were dry and no samples could be taken.

P2 emission point

Suspended solids was reported as 145mg/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 29th July 2026 which stated the following;

There has been little rainfall during this quarter. We believe that solids from the ground may have been collected when collecting the sample.

A membrane has been placed in the channel of P2, we hope that this will collect suspended solids to prevent further breaches moving forward.

Action 1.

Comply with the limits as per Regulation 36 notice issued on 11/08/26.

Emissions to sewer

Quarterly monitoring of treated leachate was reported as per Permit Condition 3.7.1 (b), Schedule 3, Table S3.4.

Treated leachate was reported to be 170mg/l above the 150mg/l limit but with 12.7% uncertainty is below the ELV on 30/04/26.

The site reported no treated leachate was discharged to sewer during May and June 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 except for the following wells as they had collapsed:

LCP7

RMLP9D

Permit Condition 3.7.5 states the following:

Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2, S3.3, S3.4, S3.5, S3.6, S3.7, S3.8, S3.9, S3.10 and S3.11 unless otherwise agreed in writing by Natural Resources Wales.

This attracts a score:

IR3E Monitoring. Permit Condition 3.7.5. Score C3.

These wells were found to be collapsed on 27/04/26 when NRW witnessed the planned

CCTV survey.

No proposals have been received from the Operator to repair or replace this infrastructure and this attracts a score:

IR1A General Management. Permit Condition 1.1. Score C3.

Action 2.

Submit a plan with suitable timelines to repair or replace LCP7 and RMLP9D by 30th September 2026.

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 are awaiting a proposal for the installation of Reedbeds to reduce ammonia.

The surface water lagoon located next to W5 is currently being emptied as we believe water from this lagoon is leaching into the groundwater.

Action 3.

Continue to investigate how ammonia is leaching from the surface water lagoon into groundwater and forward the proposal for the installation of reedbeds to NRW by 30th September 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 74.2%v/v at G12 and Carbon Dioxide as 27.4%v/v at G35.

Methane at 74.2%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 27.4%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

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.

Capping will recommence at the start of August. Following this, additional wells will be drilled which should prevent perimeter gas migration.

Action 4.

Comply with the limits as per Regulation 36 notice issued on 11/08/26.

Landfill Gas - other monitoring requirements

The quarterly requirements as stipulated in Table S3.8 and Table S4.1 were reported as required.

Action 5.

Air ingress into the system is apparent from the data submitted and as per Table S3.8 an assessment of air ingress into the system shall be undertaken by 31/12/26.

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.

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.