



Government of **Western Australia**
Department of **Water and Environmental Regulation**

Prevention Notice

Section 73A of the *Environmental Protection Act 1986*

Person to whom this notice is served:

***Prime Meat Processors Pty Ltd (ACN 618 734 875)
(t/a Avon Valley Abattoir)***

***Premises: Lot 1343 on Plan 246966, Northam-Pithara
Road IRISHTOWN, WA 6401***

19 July 2019

Persons to whom this Prevention Notice is given

This Prevention Notice is given to Prime Meat Processors Pty Ltd (ACN 618 734 875) (trading as **Avon Valley Abattoir**) Lot 1343 Northam-Pithara Road IRISHTOWN, WA 6041, the holder of Licence Number L6010/1989/13 (the **Licensee**) issued under Part V, Division 3 of the **EP Act**. The principal place of business of Prime Meat Processors Pty Ltd is the Premises.

Premises to which this Prevention Notice relates

The **Premises** the subject of the Prevention Notice is situated at Lot 1343 on Plan 246966 Northam-Pithara Road IRISHTOWN, WA 6041 (Schedule 1).

The owner of the property on which the licensed premises is situated, is Prime Meat Holdings Pty Ltd. (ACN 618 734 866).

Mr Mark Surtees Grant is the sole Director of both Prime Meat Holdings Pty Ltd and Prime Meat Processors Pty Ltd.

Under the Licence, the Premises is a prescribed premises and Prime Meat Processors Pty Ltd (the Licensee) is authorised to conduct the following activities as set out in Schedule 1 of the Environmental Protection Regulations 1987 (**EP Regulations**):

Category number	Category description	Production or design capacity	Approved premises production or design capacity
15	Abattoir: premises on which animals are slaughtered	1,000 tonnes or more per year	16,500 tonnes of livestock per year
16	Rendering Operation: premises on which substances from animal material are processed or extracted.	100 tonnes or more per year	3,744 tonnes per year
55	Livestock sale yard or holding pen: premises on which live animals are held pending their sale, shipment or slaughter	10,000 animals or more per year	144,000 animals per year

Reason for this Prevention Notice

- A. This Prevention Notice is issued to Prime Meat Processors Pty Ltd because waste is being discharged otherwise in accordance with licence L6010/1989/13 requirements and I reasonably suspect that a condition of pollution is likely to arise, or has arisen.
- B. The current operation of the premises is causing unreasonable odour emissions from the Premises.
- C. As I am satisfied that Prime Meat Processors Pty Ltd has caused or allowed to be caused the likelihood of the condition of pollution referred to above, I consider the Licensee to be the appropriate person to give this Prevention Notice to.

Requirements of this Prevention Notice

Terms used in this Prevention Notice have the meaning defined in Schedule 2 to this Notice.

In accordance with s73A(2) of the EP Act, this Prevention Notice is subject to the following requirements to prevent the condition of pollution from arising and to control or abate unreasonable odour emissions from the Premises:

Remove and Dispose

1. Prime Meat Processors Pty Ltd is to direct that:

- (a) No later than 5:00pm on each working day, remove and transport from the premises all abattoir processing bi-product including: animal effluent and residues to a licensed landfill facility for burial or to a licensed rendering facility, other than Avon Valley Abattoir in accordance with the *Environmental Protection (Controlled Waste) Regulations 2004*.
- (b) No later than 14 days after the date of this Notice remove and transport all existing processed abattoir waste including: partially rendered material held in containment structures, stockpiled or buried on the premises or to a licensed landfill facility in accordance with the *Environmental Protection (Controlled Waste) Regulations 2004*.
- (c) No later than 14 days after the date of this Notice remove all existing stored animal skins from the Premises.
- (d) All animal skins shall be refrigerated or treated with salt within 8 hours of slaughter and stored on a covered hardstand area.
- (e) By 5:00pm each Tuesday all animal skins generated from abattoir processing from the previous operating week shall be removed from the Premises.
- (f) No later than the end of each working day all abattoir processing bi-product including: animal effluent and residues are to be cleaned from the external hard stand areas.

Disposal to waste water treatment ponds

2. Prime Meat Processors Pty Ltd is to:

- (a) Immediately cease directing fell mongering waste water to the waste water treatment ponds.
- (b) At no time permit any blood waste be discharged into the waste water treatment ponds or into the environment.
- (c) Immediately cease discharge of any waste water including irrigation of waste water from the final waste water treatment pond to land **unless it complies with the requirements in Section 4 Irrigation of Waste Water to Land.**

Management Plan

3. By 20 August 2019 Prime Meat Processors Pty Ltd is to submit to the CEO a Waste Discharge Management Plan detailing the actions they will undertake to manage and/or dispose of all solid and liquid waste at the premises. The management plan must cover the site operational activities as specified in Schedule 3 Waste Discharge Management Plan Operational Activities and detail:

- (a) A description of the standard process for each operational activity;
- (b) Specified areas for each operational activity (include a map);
- (c) Infrastructure for each operational activity (including secondary containment measures);
- (d) Maintenance schedule and back up equipment used for each operational activity;
- (e) Documented process monitoring procedure for each operational activity with specified timeframes for each process;
- (f) Documented contingency planning and triggers for enacting contingency plans for each operational activity;
- (g) Documented process for the disposal and management of non-conforming materials equipment, wastes and products;
- (h) Documentation of situations in which the premises will notify DWER in accordance with Section 72 of the EP Act; and
- (i) Documentation of situations in which the premises, or operational activities within the premises will cease to operate.

4. Irrigation of wastewater to land

Prime Meat Processors Pty Ltd shall not irrigate waste water to land other than in accordance with the provisions below:

- (a) Only treated wastewater from the final effluent treatment pond shall be irrigated as indicated in Schedule 1
- (b) No irrigation generated runoff, spray drift or discharge occurs beyond the boundary of the irrigation areas A and B as specified in Schedule 1
- (c) Irrigation does not occur on land that is waterlogged
- (d) Irrigation is not undertaken when rainfall is imminent, during rainfall or immediately after rainfall;
- (e) Wastewater is evenly distributed over the irrigation area using a travelling irrigator;
- (f) No soil erosion occurs;
- (g) Irrigation does not occur over leach drains or areas receiving storm water drainage
- (h) Irrigation does not occur within 50m of creek lines or within 20m of the property boundary as specified in Schedule 1
- (i) Irrigation shall only occur during daylight hours

5. Monitoring of emissions to land

Prime Meat Processors Pty Ltd shall undertake the following monitoring of waste water emissions to land:

- (a) Daily record of irrigation of wastewater volumes using a volumetric flow meter;
- (b) Daily visual inspection and record of visual inspection (including photographs) of irrigation area prior to commencement and following cessation of irrigation;
- (c) Weekly spot sample of waste water from final effluent treatment pond
- (d) The spot sample in (c) to be tested for total nitrogen, total phosphorus biological oxygen demand and total dissolved solids in accordance with AS/NZS 5667.1-1998 and AS/NZS5667.10-1998.
- (e) The samples undertaken in accordance with (c) and (d) shall be submitted to and tested by a laboratory with current NATA Accreditation for the parameters being measured.
- (f) Records for (a) and (b) to be provided to the CEO by 10am Monday for the previous week period
- (g) Records for (c), (d) and (e) to be provided to the CEO by 10am Monday for the previous fortnight period.

Engage and retain an Environmental Consultant

6. Prime Meat Processors Pty Ltd is to:

- (a) Within 14 days of this Notice being served, notify the CEO of the Environmental Consultant engaged to carry out the actions required by this Notice under clause 10, for approval by the CEO.
- (b) Within 14 days of the CEO's approval of the Environmental Consultant, is to engage and retain that Environmental Consultant to:
 - i. Review all materially relevant information relating to Waste Discharge Management Plan
 - ii. Prepare a draft Management Plan documenting requirements of clause 10 and Schedule 3 of this Notice.
 - iii. No later than 20 August 2019, to provide the draft Management Plan to the CEO for approval;
 - iv. Within 14 days of receiving the CEO's notice of any required changes to the draft Management Plan to ensure that the Environmental Consultant make those required changes to the Management Plan and to provide the amended Management Plan to the CEO for final approval; and
 - v. To commence implementation of remedial works in accordance with the approved Management Plan as approved by the CEO.
 - vi. To provide a written report outlining progress made in implementing the requirements of the approved Management Plan, to the CEO, in writing, on the last Friday of each calendar month after the Management Plan Commencement Date (the date the final plan is approved by the CEO), until such time as this Prevention Notice is cancelled by written notice of the CEO.
 - vii. Is to take all reasonable steps to ensure the Environmental Consultant carries out the actions required by this Notice within the times specified.

Reporting

7. Prime Meat Processors Pty Ltd is to provide the CEO with:

- (i) Disposal receipts/invoices as documented evidence of all abattoir processing bi-product waste removal from the Premises as required under this PN; and
- (ii) Disposal receipts/invoices as documented evidence of all existing processed abattoir and animal skins removal from the Premises as required under this PN.

- (iii) Disposal receipts/invoices as documented evidence of removal of waste water from the waste water treatment ponds from the Premises as required under this PN.

until this Prevention Notice is cancelled by written notice of the CEO.

Prevention of Emissions

- 8. Prime Meat Processors Pty Ltd is to take all necessary steps to prevent unreasonable odour emission outside the premises boundary.

Restriction of acceptance of raw animal waste and rendering operations

- 9. Prime Meat Processors Pty Ltd is to:
 - (a) Cease accepting animal parts for rendering from any off-site meat processing facility until approval is granted by the CEO.
 - (b) Cease rendering operations until approval is granted by the CEO.
 - (c) Must install and maintain a clearly visible sign outside the entrance to the Premises until approval to remove the sign is granted by the CEO, specifying
 - a. Raw animal parts will not be accepted on the premises; and
 - b. No rendering activities will be undertaken on the premises.

until this Prevention Notice is cancelled by written notice of the CEO.

Appeal Rights

IMPORTANT NOTE: A PERSON WHO IS BOUND BY THIS NOTICE AND WHO DOES NOT COMPLY WITH THIS NOTICE COMMITS AN OFFENCE.

A person who is aggrieved by a requirement contained in this Notice may within 21 days of being given this Notice lodge with the Minister for Environment an appeal in writing setting out the grounds of that appeal.

Any other person who disagrees with a requirement contained in this Notice may within 21 days of the making of that requirement lodge with the Minister for the Environment an appeal in writing setting out the grounds of that appeal.

PENDING THE DETERMINATION OF AN APPEAL REFERRED TO ABOVE THE RELEVANT REQUIREMENTS CONTAINED IN THIS NOTICE CONTINUE TO HAVE EFFECT.


Jason Nelson
Senior Investigator



Approved

Mike Rowe

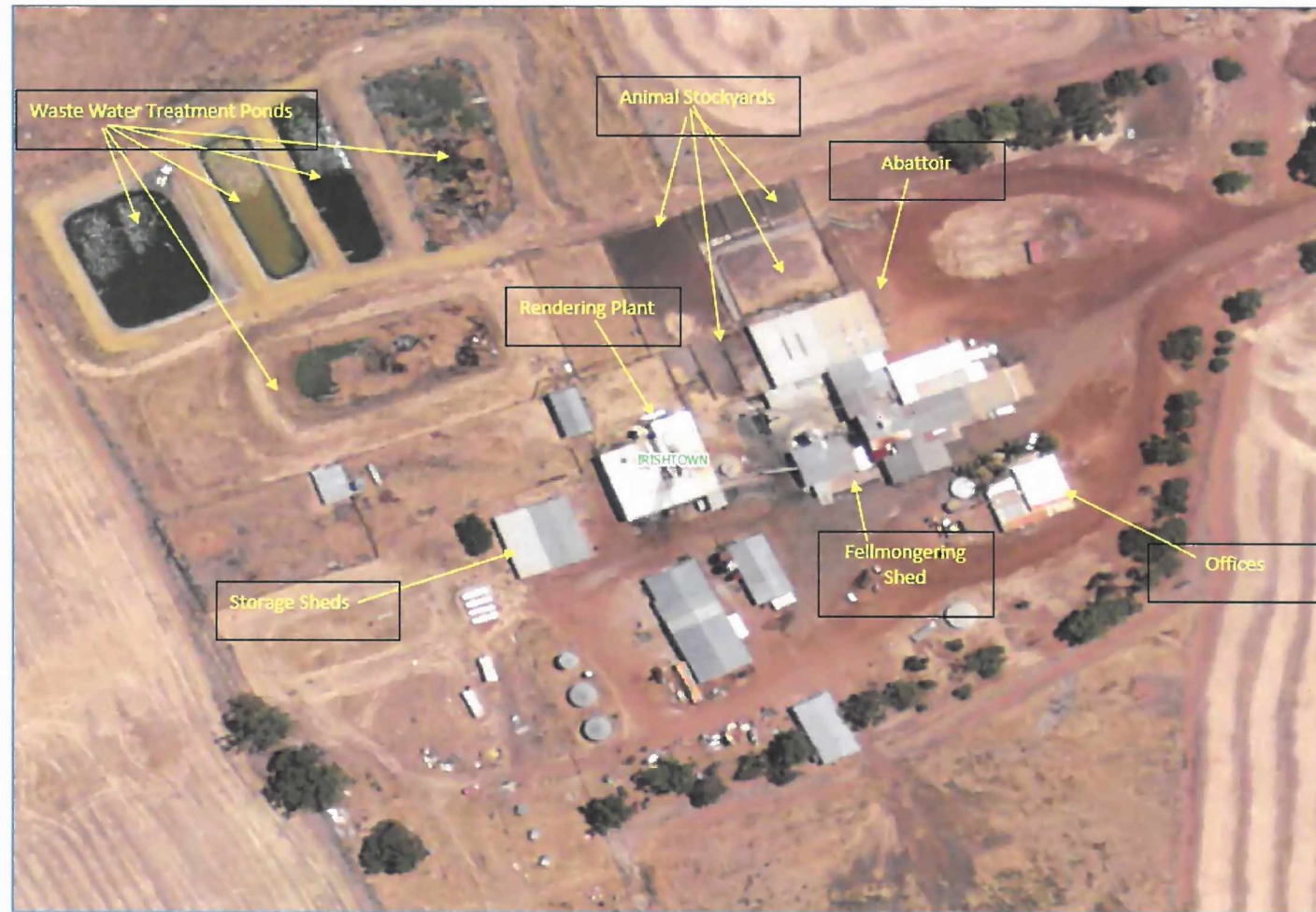
Chief Executive Officer
Department of Water and Environment Regulation



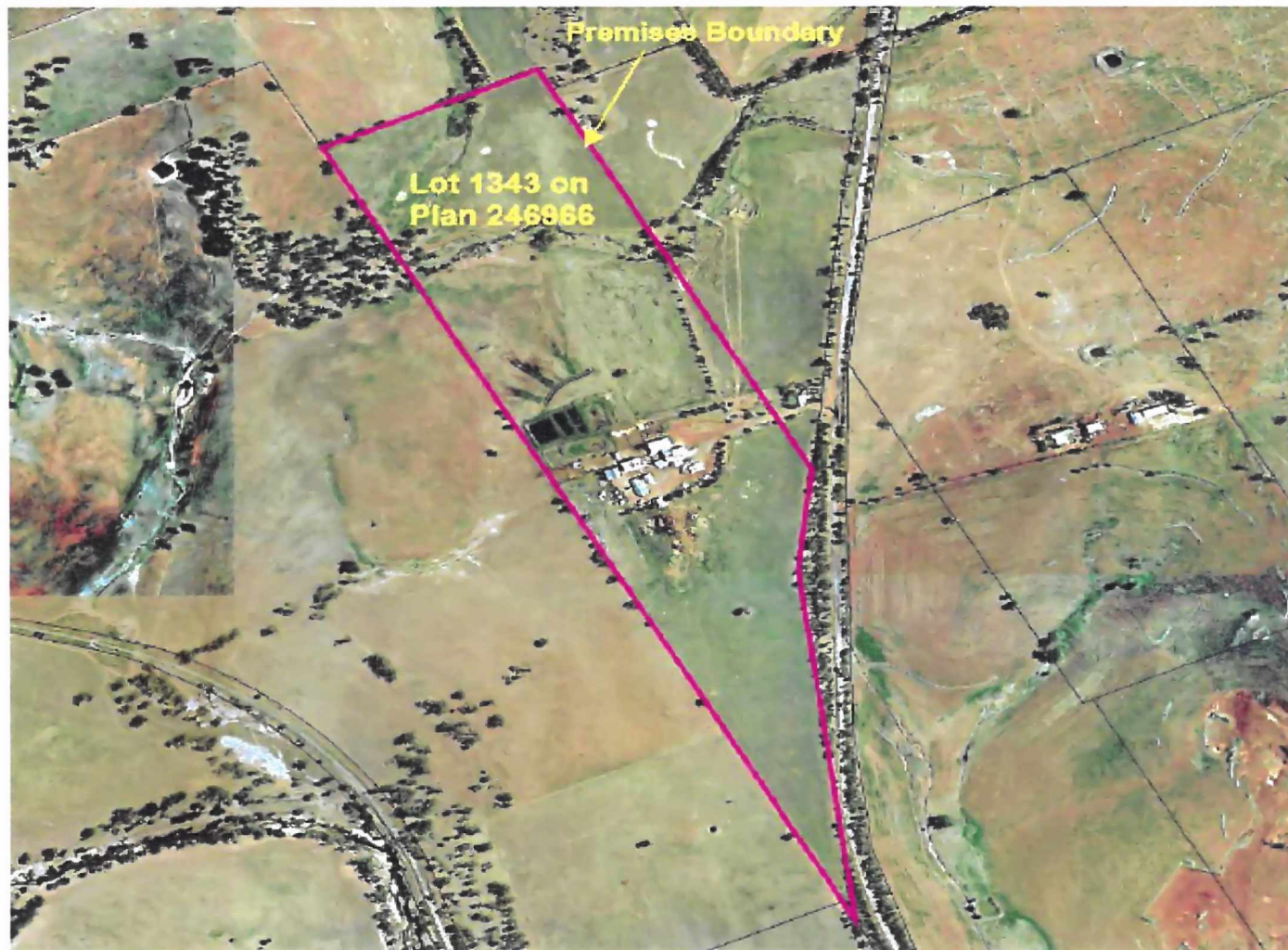
Dated at Joondalup this 19th day of July 2019

Schedule 1 – Plans

Premises



Prescribed premises boundary



Temporary approved irrigation areas



Schedule 2 – Definitions

In this Prevention Notice, the following terms have the following meanings:

Abattoir means remises on which animals are slaughtered.

AS/NZS 5667.1-1998 means the Australian Standard AS/NZS 5667.1-1998 Water quality Sampling – Guidance on the design of sampling programs, sampling techniques and the preservation and handling of samples.

AS/NZS 5667.10-1998 means the Australian Standard AS/NZS 5667.10-1998 Water quality – Sampling – Guidance on sampling of wastewaters

CEO means Chief Executive Officer, Department of Water Environmental Regulation and

CEO for the purposes of notification means:

Director General

Department Administering the *Environmental Protection Act 1986*

Locked Bag 10

Joondalup DC WA 6919

Condition means a requirement to which this Prevention Notice is subject under s73A(2) of the **EP Act**.

Days means all days including weekends.

DWER means the Department of Water and Environmental Regulation

EP Act means the *Environmental Protection Act 1986* (WA).

‘Environmental Consultant’ means an environmental consultant as described in section 4.2 of Schedule B9 of the NEPM, with demonstrable prior experience in remediating contamination and management of waste discharges in an environmental setting.

Fellmongering means animal skins or hides are dried, cured or stored.

Inspector means a person appointed to be an inspector under section 88, and includes the CEO.

Licensee means the holder of a licence issued under the *Environmental Protection Act 1986* being Prime Meat Processors Pty Ltd (ACN 618 734 875)

NATA means the National Association of Testing Authorities, Australia

NATA Accreditation – means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis.

Owners refers to the Owners of the **Premises** being Prime Meat Holdings Pty Ltd.

Premises refers to the premises to which this Prevention Notice applies, as specified at the front of this Prevention Notice and as shown on the map in Schedule 1 to this Prevention Notice.

Rendering means processing substances from animal material are processed or extracted.

Stick water means the wastewater liberated from the heat treatment of animal raw materials, following the removal of animal solids and tallow

Unreasonable emission means an emission of odour, which unreasonably interferes with the health, welfare, convenience, comfort or amenity of any person.

Waste has the same meaning given to that term under the EP Act.

Schedule 3 – Waste Discharge Management Plan Operational Activities

Site operational activity	Information to be included in the waste discharge management plan:
Delivery of live animals	<p>Transport of animals</p> <ul style="list-style-type: none"> • Delivery times/days • Types and numbers processed per day, including live weight • Manure from vehicles • Vehicle washdown wash water • Morbidities/mortalities/ pregnant animal management
Stock holding pens/lairage	<ul style="list-style-type: none"> • Numbers, type, residence time prior to slaughter • Calf management (noise) • Watering/feeding regimes (spilt materials management) • Feed storage • Manure and manure storage • Morbidities/mortalities • Flooring materials/waste replacement • Bunding of pens • Quarantine areas • Stormwater • Urine collection and/or estimation of contaminant loading • A descriptive account of controls to minimize manure being flushed from the stockyards to the WWTP
Slaughtering Process	<ul style="list-style-type: none"> • maximum numbers of each species per day • hours of operation • volumes of animal waste generated per day (maximum) including skins; offal; blood, paunch other(heads, feet, bones) • Volumes of other solid wastes generated: wooden crates; packaging, hygiene products,

Site operational activity	Information to be included in the waste discharge management plan:
	<p>bullets</p> <ul style="list-style-type: none"> • Description of slaughtering process (start to finish) • Specific areas/infrastructure per species • Capture and storage of wastes (specified areas, process, specified infrastructure, holding times,) • Process and timeframes for off-site disposal of non-organic solid waste materials from the slaughtering process
Raw Materials Storage and Handling	<ul style="list-style-type: none"> • Overview of raw materials storage and handling process and equipment/infrastructure • Daily record of wet volume/weight of raw materials requiring treatment • Specifications for all equipment/infrastructure including type, capacity, construction material, volume, size; purpose and operational limitations. • Ability of equipment/infrastructure to fully seal or enclose raw materials, odours and aerosols; • Where equipment/infrastructure is not fully enclosed or sealed specify what abatement mechanisms are in place to manage emissions and discharges • Level of protection of equipment from incumbent weather and pests/vermin. • Secondary containment infrastructure • Timeframes for storage of each type of raw material prior to entering into the rendering cooker. • Processes for storage, separation and pre-treatment of each type of raw materials prior to rendering (eg: particle size reduction; coagulation, cooling, drying) • Cleaning products and procedures for all equipment and areas; • Location that cleaning of equipment is carried out if not fixed equipment; • Estimated volumes of wastewater generated from cleaning activities.

Site operational activity	Information to be included in the waste discharge management plan:
	<ul style="list-style-type: none"> • Inspection schedule/procedure and timeframes for identifying and carrying out maintenance requirements; repair, diversion of non-confirming materials; clean-up for discharges and spills. • Identification and documented process for critical control points monitoring during the storage and handling of raw materials including to secondary containment infrastructure • Process for dealing with raw materials above Licensed rendering throughput capacity; • Documented daily records and receipts for raw material sent off site • Management of fugitive and point source odours from raw materials storage and handling areas
Rendering	<ul style="list-style-type: none"> • Specifications for all rendering equipment such as: rendering vessels used; shakers, screens; conveyors, screw and meal presses, centrifuges, decanters; condensers, cooling towers/heat exchange units, chemical or dissolved air floatation units, tallow tanks, blood tanks and associated infrastructure. • Specifications to include but not limited to throughput capacity, construction material, volume; secondary containment measures, operational method and limitations. • Overview of rendering process and equipment use • Cooking temperatures and residence and how this varies depending on raw material composition, particle size and volumes. • Process for ensuring required rendering temperatures and residence time are achieved for each batch • Maximum moisture content of solids following pressing; drying and shaking and how this is monitoring and verified throughout the process; • Process for polishing or removing fine particulates from tallow and stick water once separated from solid product and how this is monitored and verified;

Site operational activity	Information to be included in the waste discharge management plan:
	<ul style="list-style-type: none"> • Process for cooling stick water prior to entering wastewater treatment plant. • Process for monitoring volumes and quality of stick waster requiring treatment in the wastewater treatment plant • Maximum and optimal temperature ranges for wastewater entering the waste water treatment plant and how this is verified • Fuel sources/energy supply for operation of equipment • Identification and documented process for the critical control point monitoring throughout the daily operation of the rendering plant; • Identification and documented process for the identification of equipment requiring maintenance, replacement or shut down of equipment during daily operation and specified timeframes for action. • Management and monitoring of point source and fugitive odours from rendering processes; • Cleaning products and procedures for all equipment and areas; • Documented process for identifying and managing partially rendered materials (including spilt materials) and the timeframes for reincorporation in to the rendering process or for offsite disposal.
Rendering	<ul style="list-style-type: none"> • Timeframes for removal of existing rendering products from the premises (tallow, meat meal) • Timeframe and schedule for the removal and cleaning of any animal residues and materials with the potential to cause odour from all rendering equipment and operational areas.
Rendered product management	<ul style="list-style-type: none"> • Identification of tallow and meal storage and load out areas, including specifications for all equipment/infrastructure including type, capacity, construction material, volume, size; purpose and operational limitations. • Timeframes for storage and loadout of final product

Site operational activity	Information to be included in the waste discharge management plan:
	<ul style="list-style-type: none"> Cleaning product and procedures for equipment in these areas including secondary containment infrastructure.
Solid organic waste	<ul style="list-style-type: none"> The disposal of material collected by effluent pretreatment devices (e.g: grids, grates, screen and traps). The storage, drying and final use of paunch material. Provide a descriptive account of the process of paunch and manure application to land that includes: physical application method; nutrient loading rate, application rate per hectare, pasteurization process, run-off control and vermin management. Process and timeframes for disposal of animal bi-products off site (e.g: blood, offal, heads, feet)
Animal skin treatment	<ul style="list-style-type: none"> Curing process, chemicals used and wastes generated Infrastructure Numbers, types of skins Timeframes for off-site sale/disposal
Wastewater	<ul style="list-style-type: none"> A descriptive and diagrammatic account of all infrastructure upstream of wastewater treatment ponds (WWTP) For example: conveyance channels and pipework, grids, interceptor traps, rotary screens, shakers, grates, cooling towers, chemical and/or dissolved air floatation units Cleaning processes including volumes of water used per day per animal, chemicals including any cleaning of secondary containment infrastructure (for example: floor pipes, drains, grates, screens and grids) Process for separating contaminated and non-contaminated storm water across the premises A descriptive account of controls to prevent chemicals and uncontaminated storm-water entering the WWTP.
Wastewater Treatment Ponds (WWTP)	<ul style="list-style-type: none"> Engage a qualified third party independent wastewater engineer with experience in the

Site operational activity	Information to be included in the waste discharge management plan:
	<p>operation, management and monitoring of facilities for the biological treatment of wastewater. The third party engineer to provide a plan for the remediation and ongoing operation of the WWTP and upstream wastewater management practices.</p> <ul style="list-style-type: none"> • Provide a descriptive and diagrammatic account of waste water treatment plant ponds, pumps, freeboard, and discharge infrastructure • Provide a water balance for the WWTP system • Provide a descriptive account of water quality treatment objectives and residence timeframes within each stage of the treatment cycle including, operator controls, monitoring and management to validate water quality objectives are met; • Detail an implementation strategy for managing and improving the function of the WWTP • Provide a timeframe for implementation of the strategy for managing and improving the function of the WWTP • A descriptive account of the method to prevent solid material to overflow from Anaerobic ponds to aerobic ponds • A descriptive account of anaerobic pond function and crust integrity; • A descriptive account of erosion, scouring, flooding, pooling around the WWTP • A descriptive account of the capacity of the effluent treatment ponds in the context of sludge accumulation, management and the pond capacity to adequately treat effluent. • A descriptive account of the volume of wet weather storage available for when irrigation is not undertaken.
WWTP structural review	<ul style="list-style-type: none"> • A descriptive account of the geotechnical stability of the ponds carried out by a suitably qualified third party independent engineer or geotechnical expert with experience in the auditing, management and maintenance of waste and wastewater containment ponds.

Site operational activity	Information to be included in the waste discharge management plan:
Irrigation Area	<ul style="list-style-type: none"> • Engage a qualified third party independent hydrologist with experience in the investigation into soil, surface water and groundwater resource characterization and irrigation management with salt and nutrient rich wastewaters. The third party hydrologist to provide a plan for the remediation and sustainable discharge of treated wastewater and solid organic waste to land. • Crop type and crop irrigation requirements • Meter calibration • Irrigation triggers and process • A descriptive and diagrammatic account of the irrigation area and sprinkler system • A descriptive account of the volume and quality of effluent irrigated and the capacity of the land area to assimilate the hydraulic, nutrient and salt loading. • Prevention of pooling/erosion/runoff • Management of spray drift • Maintenance schedule
Odour	<ul style="list-style-type: none"> • Complaints system, investigation process and corrective action implementation plan