



## Application for Licence Amendment

### Part V Division 3 of the *Environmental Protection Act 1986*

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<b>Licence Number</b>	L6112/1996/11
<b>Licence Holder</b>	Borrello Holdings (WA) Pty Ltd
<b>ACN</b>	150 463 442
<b>File Number</b>	DER2015/001535-1
<b>Premises</b>	Gingin Meatworks 326 Cockram Road LENNARD BROOK WA 6503  Legal description - Lots 195 and 328 on Deposited Plan 231420, Lot 343 on Deposited Plan 231044 Certificate of Title Volume 1565 Folio 557
<b>Date of Report</b>	18 November 2020
<b>Proposed Decision</b>	Revised licence granted

Caron Goodbourn  
**Manager, Process Industries**  
an officer delegated under section 20  
of the *Environmental Protection Act 1986* (WA)

## 1. Decision summary

This amendment report documents the assessment of potential risks to the environment from construction and operation of new tripe and hock processing rooms at the Gingin Meatworks premises and the associated amendments made to L6112/1996/11 pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The Delegated Officer has determined to grant amended licence L6112/1996/11 as a result of this assessment.

The decision report for the existing licence will remain on the department's website for future reference and will act as a record of the department's decision making.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this report, the department has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/one-stop-shop> under Industry Regulation – Regulatory documents.

### 2.2 Application summary

Licence L6112/1996/11 is held by Borrello Holdings (WA) Pty Ltd (licence holder) for the Gingin Meatworks abattoir (the Premises), located at 326 Cockram Road, Lennard Brook, Western Australia.

The Premises relates to the categories and the assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in existing licence L6112/1996/11.

On 5 August 2020, the licence holder submitted an application for a works approval for the construction of two new rooms for processing of tripe and hocks. The Delegated Officer determined to assess the application as a licence amendment.

#### **Operation of new tripe and beef hock processing**

The licence holder proposes to process tripe and beef hocks from the animals processed at the premises. The process involves collecting, washing and packing of the tripe and beef hocks, which ordinarily would be disposed of as waste in the current processing that takes place.

Liquid wastewater from the machines (processing) will be connected to the existing underground pipe work and processed through the wastewater treatment system for disposal through evaporation and irrigation. All four ponds are HDPE lined, with the final evaporation pond having a 300mm freeboard requirement which reported as being inspected daily. Water that enters the current treatment system is disposed of via a combination of evaporation and irrigation.

Solid waste generated will consist of paunch material from the animal stomach, hair and toe caps from the hocks and biological waste from the off cuts during trimming of the tripe, plus any non-conforming product. This will continue to be disposed of off-site as usual with no change in process.

New processing areas will have concrete flooring with a non-pervious additional epoxy coating applied and are contained with drainage that is connected to the existing wastewater system. The additional epoxy floor coating seals the concrete to prevent moisture and bacteria absorbing into the floor slab.

## **Wastewater management**

The licence holder has stated that they are confident that current wastewater containment, treatment and disposal infrastructure in place will be capable of containing and treating the additional volume of wastewater that will be generated from the tripe and hock processing rooms.

The licence holder has been provided estimates from the new equipment manufacturers that an increase of up to 8,094kL per annual period will be added to the current waste stream from both the hock and tripe processing rooms combined. This additional wastewater stream would equate to a total liquid waste stream from the abattoir of approximately 26,094kL per annual period. This would result in an estimated total volume of 12,003kL treated wastewater requiring disposal (irrigation).

The irrigation figure has been provided by the licence holder estimating that 46% of the total waste water inputted into the system will be irrigated, taken from the 2019 figures that saw 18,453kL inputted, and 8,476kL irrigated (46%). This is how the estimated 12,003kL figure was calculated.

Over the last 10 years, submitted Annual Environmental Reports (AER) have contained an average of 9,913kL being irrigated during this period. The lowest volume being 6738kL in 2015, and the highest 16,333kL in 2011. Irrigation volumes exceeded the current proposed volumes in 2008, 2009, 2010 and 2011. The average annual irrigation volume over the last 10 years has been 9,813kL.

The licence holder also stated that the irrigation plots are on sloping ground so water pooling is not an operational issue, the soil type is sandy gravel with low clay content which allows for good water uptake, but also allows for good moisture dispersion to avoid saturation issues.

Nutrient loading for the reporting period at the time of this assessment all appears to be within the set loading limits. The previous 3 reporting periods have resulted in exceedances for Total Nitrogen, which has a limit of 300kg/ha/yr 2018 was at 385.9kg/ha/yr, reducing to 313kg/ha/yr for 2019. Adjustments have been made to the system and the results for the first 8 months of the year are averaging within the licence limits.

**Table 1: Risk assessment of potential emissions and discharges from the Premises during construction and operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence holder controls sufficient?	Conditions of licence <sup>2</sup>	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder controls				
Construction								
Earthworks, construction, and heavy haulage vehicle movement	Dust	Air/windborne pathway  Public Health and amenity	4 rural residents  Closest rural residence – 240m S., Other residents approximately 500m to SW, NW and NE	Construction to occur only during daytime hours (noise)  No other controls documented	C = Slight L = Possible <b>Low Risk</b>	Earthworks are minor and of short duration so the licence holder control of only undertaking construction during daylight hours to be sufficient	No conditions necessary	None required
	Noise							
Operation								
Liquid waste from processing of tripe and hock – connection to current drainage pipework and treated via wastewater treatment system prior to disposal to existing wastewater treatment and disposal (irrigation) system.  An estimated increase of 8,094kL of liquid waste (43% increase on 2019) will be generated from the operation of the works.	Nutrient rich wastewater <ul style="list-style-type: none"><li>Increased volume of wastewater requiring treatment and irrigation</li><li>Increased volume of wastewater requiring storage (overtopping)</li></ul>	Possible contamination of soil and/or groundwater	Lennard Brook – 80m from nearest wastewater treatment pond and 180m from irrigation area  Groundwater 4–11 mbgl with seasonal fluctuations	<ul style="list-style-type: none"><li>Disposal of wastewater to existing wastewater treatment and irrigation system - sufficient capacity to handle increase</li><li>Maintenance of freeboard of final pond – 300mm</li><li>All 4 ponds within treatment system are HDPE lined</li></ul>	C = Minor L = Rare <b>Low Risk</b>	Y	Existing licence Condition 1 (table 1) – 300mm freeboard  Existing licence Condition 5 (table 4) – waste disposal – irrigation management  New licence Condition 1 (table 1) - Tripe and Hock processing rooms with an impervious concrete floor graded and drained to the existing wwts through a solids screen	Additional liquid waste volumes are being generated by the new processing rooms. The waste is required to enter the current wastewater treatment system via the current pipeline that feeds the system.

Note <sup>1</sup>: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017)

Note<sup>2</sup>: Setting of conditions are detailed in the *Guidance Statement: Setting Conditions* (DER 2015)

### 3. Consultation

The licence holder was provided with the draft Amendment Report on 21 October 2020. No comment provided during the 21-day comment period.

### 4. Conclusion

The licensee has provided information to support the conclusion that the current wastewater treatment and disposal infrastructure and operational controls are sufficient to handle the increase in liquid waste being generated from the operation of the new tripe and hock processing rooms. A full water balance will be requested at the time of the next licence review.

Based on the assessment within this Amendment Report, the Delegated Officer has determined that the revised licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

Planning approval for the new tripe and hock processing facility is currently awaiting approval from the Shire of Gingin. The licence amendment will only be granted following confirmation that planning approval for the works has been granted.

### Summary of amendments

Table 2 provides a summary of the amendments and will act as record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process.

**Table 2: Summary of licence amendments**

Condition no.	Proposed amendments
1 (table 1)	Inclusion of new tripe and hock processing rooms added to infrastructure, with associated operational controls (drainage)
2 (table 3)	Infrastructure requirements – construction of hock and processing rooms
3	Construction requirements (tables 2 and 3)
4 (table 4)	Removal of hocks from list of animal wastes removed offsite for rendering Wastewater to include waste stream generated from tripe and hock processing rooms
5 (table 5)	Change of table number from 4 to 5
6 (table 6)	Change of table number from 5 to 6 'Annual period' replaces 'yr'
7 (table 7)	Change of table number from 6 to 7 Process description to include tripe and hock processing
8 (table 8)	Change of table number from 7 to 8
9 (table 9)	Change of table number from 8 to 9
10 (table 10)	Change of table number from 9 to 10
11 (table 11)	Change of table number from 10 to 11
19 (table 12)	Change of table number from 11 to 12

Definitions (table 13)	Change of table number from 12 to 13
Schedule 1 Maps (figure 2)	Map updated to show new processing rooms

## References

1. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
2. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Previous L6112/1996/11 Decision Report - 10 July 2020 (A1898759).
4. Application form IR-F09 – Licence amendment, Part V, Division 3, Environmental Protection Act 1986, Environmental Protection Regulations 1987 (A1920052).
5. AER for reporting periods 2018 and 2019 (A1762761, DWERDT263305)