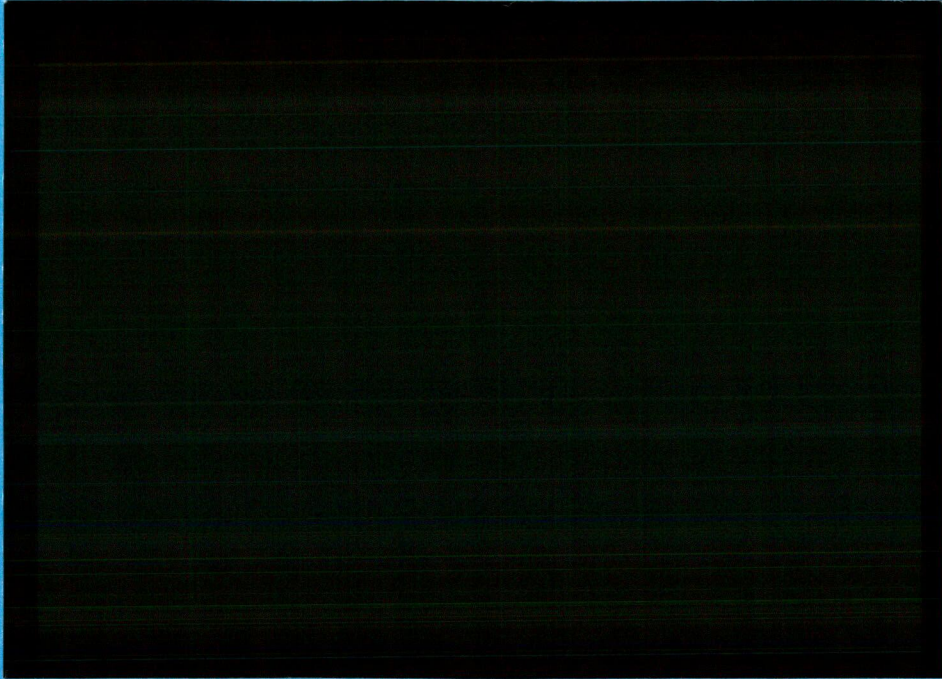


SER/NSWEPA  
CAR/QAF

Environment Protection Authority



**COMPLIANCE AUDIT PROGRAM**



ENVIRONMENT PROTECTION AUTHORITY

Environment  
Protection  
Authority  
New South Wales



ENVIRONMENT PROTECTION AUTHORITY  
THE EPA IS PART OF THE DEPARTMENT OF ENVIRONMENT  
AND CONSERVATION

*QAF Mead Industries Pty Ltd*

FINAL

COMPLIANCE AUDIT REPORT

BUNGOWANNAH PIGGERY  
RIVERINA HIGHWAY  
BUNGOWANNAH NSW

February 2004



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## EXECUTIVE SUMMARY

An EPA Compliance Audit was undertaken at the Bungowannah Piggery located on the Riverina Highway, Bungowannah as part of a statewide program of compliance audit with the intention of improving environmental performance. The main objectives of the audit were to assess compliance with the statutory requirements administered by the EPA and make recommendations for an action program to address non-compliance identified during the audit.

Assessment of compliance was undertaken by a detailed audit inspection, information supplied by the enterprise, and a review of records and documentation relating to the premises. The procedures and protocols for conducting compliance audits are detailed in the EPA Compliance Audit Handbook. The audit inspection was carried out by officers of the EPA on 24 September 2003.

The findings of the audit indicate that the licensee was complying with all of the conditions attached to the Environment Protection Licence issued under the Protection of the Environment Operations Act (POEO), 1997.

Issues identified through further observations included:

- solid waste management; and
- potential groundwater contamination.



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## 1.0 INTRODUCTION

An EPA Compliance Audit has been undertaken in relation to the Bungowannah Piggery operated by QAF Meat Industries Pty Ltd, as part of a statewide program of compliance audits. The audit inspection was undertaken on 24 September 2003.

The procedures and processes for conducting EPA Compliance Audits are detailed in the *EPA Compliance Audit Handbook*.

This report has been prepared to present the findings of the audit carried out and no responsibility is accepted for its use in any other context, or for any other purpose.

### 1.1 Audit Objective

The objectives of the audit were:

- to determine whether the enterprise has the appropriate statutory instruments required under the Protection of the Environment Operations Act (POEO Act);
- to determine whether the enterprise is complying with all licensing requirements of the POEO Act;
- to outline a time frame for follow-up action to address any non-compliances identified during the audit.

### 1.2 Scope of the Audit

The scope of the audit was limited to an examination of the activities undertaken at the Bungowannah Piggery operated by QAF Meat Industries Pty Ltd.

The audit period adopted for assessment of compliance of activities undertaken at the above premise is as follows:

- Operational and General Conditions - 24 hours prior to the end of the audit inspection;
- All other conditions - 12 months prior to the date of the audit inspection.

Activities examined during the audit included:

- operational activities;
- storage of materials;
- pollution controls on site; and
- stormwater management.

### 1.3 Audit Criteria, Evidence and Findings

Audit criteria (the requirements against which the auditor compares collected audit evidence) comprised the requirements of the licence issued under the POEO Act for the Bungowannah Piggery operated by QAF Meat Industries Pty Ltd. Audit criteria may include any document



referred to by the licence, or any material relevant to a particular condition of the licence.

Audit evidence was collected during discussions with site personnel, examination of documentation provided by the licensee and/or contained on EPA files, together with observations made during the audit inspection.

Findings of non-compliance with licence conditions are summarised in an action program, with a time frame for follow-up action necessary to comply with the licence condition concerned.

#### **1.4 Premises and Process Description**

The Bungowannah piggery is situated approximately 10 km west of Albury on the Riverina Highway. The piggery itself occupies about half of the 95 hectare property. The nearest neighbouring residence is located approximately 900 metres to the south west. An ephemeral stream, Long Flat Creek, flows through the bottom section of the property.

The piggery was developed in two stages. Stage one, a 'birth to bacon piggery' was completed in 1972. Stage two, when the piggery changed to a 6,000 sow segregated early weaning (SEW) system, was completed in 2000. The SEW production system houses breeding stock and suckers (pigs up to 21 days of age). Weaners are currently supplied to QAF's Balpool grow out site.

The four large breeder sheds have slatted floors and are flushed daily with (treated) recycled effluent. The effluent passes through two anaerobic lagoons and an aerobic lagoon before entering two settler lagoons and finally a polisher lagoon. Recycling back into the piggery occurs from the polisher lagoon. Any additional volume enters an extensive system of evaporation lagoons. The surface area of the evaporation lagoons is over 10 hectares and there is an approximately one metre net evaporation rate in the area. Sludge from the lagoons are removed by pump and/or excavator to a sludge drying bay. The dried solids are then transferred by excavator to a bunded pad for storage before being taken off site for reuse by a vermiculture company.

Fresh water is sourced from two on-site bores and pumped to a holding pond from where it is gravity fed to the pig sheds. Any dead pigs are placed in a chiller for storage prior to being taken offsite to be rendered for reuse as meat meal. Stormwater from between the sheds and accessways etc is diverted around the effluent treatment lagoon system and flows to Long Flat Creek. A groundwater monitoring program is in place to determine if any leakage from the lagoons is impacting on local groundwater.

#### **1.5 Statutory Instruments Issued to the Enterprise**

The EPA has issued the following statutory instruments to the enterprise that were in force during the past 12 months:

- Licence number 11393 issued under the Protection of the Environment Operations Act 1997. The licence is for Livestock Intensive Industries – Pig Production (greater than 500



tonnes accommodated) and Composting and Related Reprocessing or Treatment (0 – 5,000 tonnes received).

The anniversary date for the licence is 3 August. A copy of the licence is attached in **Appendix A**.

### 1.6 Risk Assessment of Non-compliances

The significance of any non-compliances identified during the audit process are categorised. Following risk assessment for non-compliances, an escalating response relative to the seriousness of the non-compliance is determined to ensure the non-compliance is addressed by the enterprise.

The risk assessment of non-compliances involves assessment of the non-compliance against two criteria; the likelihood of environmental harm occurring and the level of environmental impact as a result of the non-compliance. After these assessments have been made, information is transferred into the risk analysis matrix below.

		<b>Likelihood of Environmental Harm Occurring</b>		
		<b>Certain</b>	<b>Likely</b>	<b>Less Likely</b>
<b>Level of Environmental Impact</b>	High	<b>Code Red</b>	<b>Code Red</b>	<b>Code Orange</b>
	Moderate	<b>Code Red</b>	<b>Code Orange</b>	<b>Code Yellow</b>
	Low	<b>Code Orange</b>	<b>Code Yellow</b>	<b>Code Yellow</b>

The assessment of the likelihood of environmental harm occurring and the level of environmental impact allows for the risk assessment of the non-compliance via a colour coding system. A red risk assessment for non-compliance denotes that the non-compliance is of considerable environmental significance and therefore must be dealt with as a matter of priority. A yellow risk assessment for non-compliance indicates that the non-compliance could receive a lower priority but must be addressed.

There are also a number of licence conditions that do not have a direct environmental significance, but are still important to the integrity of the regulatory system. These conditions relate to administrative, monitoring and reporting requirements. Non-compliance of these conditions are given a blue colour code.



The colour code is used as the basis for deciding on the priority of remedial action required by the licensee and the timeframe within which the non-compliance needs to be addressed. This information is presented in the action program alongside the target/action date for the non-compliance to be addressed.

While the risk assessment of non-compliances is used to prioritise actions to be taken, the EPA considers all non-compliances are important and licensees must ensure that all non-compliances are addressed as soon as possible.

## **2.0 ASSESSMENT OF COMPLIANCE**

### **2.1 Compliance with Audit Criteria**

Compliance was assessed against the licencing requirements of the POEO Act 1997, and the requirements of Environment Protection Licence No 11393.

Assessment of compliance was undertaken by a detailed site inspection and review of all methods, records and documentation as required by the licence issued to the licensee.

The EPA's records and audit inspection reveal that the licensee was complying with the licensing requirements of the POEO Act 1997.

The findings of the audit indicate that all the conditions of the environment protection licence were being complied with.

Details of assessment are presented in Table 2.1.

## **3.0 FURTHER OBSERVATIONS**

Further observations are recorded where issues of environmental concern were observed which do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where environmental performance may be improved.

### **Solid waste management**

It was noted during the audit inspection that a quantity of solid waste had overtopped the bund surrounding the impervious solid waste storage area. Although these wastes are largely covered with a layer of vegetation, the EPA considers that the waste has the potential to pollute waters, particularly during a significant wet weather event. Therefore the Licensee should move all of the solids to within the designated bunded area and consider implementing a management strategy designed to ensure that the solid wastes are always stored wholly within the designated area. (It is understood that the solids have subsequently been relocated away from the bund wall.)



**Groundwater**

Groundwater monitoring is being conducted to determine if nutrients from any aspect of the operation are contaminating groundwater. Elevated Nitrate levels have been detected and this matter is under investigation by the Albury office of EPA. The Licensee should continue to assess the situation.

A diesel underground storage tank, which has probably been in use on the site since the operation commenced in the early 1970's, does not appear to have been pressure tested although inventories of what goes in and out of the tank are kept. Due to the age of the tank and associated pipework, the Licensee should consider closely monitoring the inventories to check if any leakage is likely to be occurring and if necessary have the tank pressure tested.



TABLE 2.1 ASSESSMENT OF COMPLIANCE WITH LICENCE NO. 11393

Statutory Instrument: Environment Protection Licence No. 11393			
Condition No.	Compliance /Risk assessment for non-compliance*	Comment	Action Required by the Licensee
1	<b>ADMINISTRATIVE CONDITIONS</b> <i>The audit assessment is based upon evidence relating to the period limited to the 12 months prior to the end of the audit inspection.</i>		
A1.2	Yes	<b>Livestock Intensive Industries - Piggeries</b>	
	Not Applicable	<b>Composting and Related Processing</b> Material is not received on the site for the purpose of composting or related processing.	
A1.3	The statement which may be included under A1.3 has not been placed on this licence and therefore no assessment of compliance is required.		
A2.1	Condition A2.1 is a statement providing details of the licensed premises. No assessment of compliance is required.		
A4.1	Not Determined	Only the first page to the licence application could be located on the EPA files and the Licensee was unable to provide a copy of the full application. However, the EPA has no reason to consider that the activities conducted on the premises are not in accordance with the information supplied on any licence application that was submitted.	
2	<b>DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND</b> <i>The audit assessment is based upon evidence relating to the period limited to the 12 months prior to the end of the audit inspection.</i>		
P1.2	This is a statement advising that the points identified in the table are for monitoring and/or setting of limits for the discharge of pollutants to water from the point. No assessment of compliance is required.		

\* See explanation of risk assessment of non-compliances codes on p3.



Statutory Instrument: Environment Protection Licence No. 11393			
Condition No.	Compliance /Risk assessment for non-compliance*	Comment	Action Required by the Licensee
P1.3		This is a statement indicating that the utilisation area referred to in the table is identified for the purpose of monitoring and/or the setting of limits. No assessment of compliance is required. EPA Identification No's. 1 to 4 refer to groundwater monitoring points on the premises.	
<b>3</b>		<b>LIMIT CONDITIONS</b> <i>The audit assessment is based upon evidence relating to the period limited to the 12 months prior to the end of the audit inspection.</i>	
L1.1	Yes	<b>Surface Water</b>	
L1.1	Not Determined	<b>Groundwater</b> It is understood that a monitoring program is in progress to determine if the offsite migration of elevated levels of nutrients in groundwater is occurring. Additionally, an ageing underground diesel storage tank is on use on the site. (see Further Observations).	The Licensee must comply with the condition.
L2.1 – 2.2		The conditions which may be included under L2.1 - 2.2 have not been placed on this licence, therefore no assessment of compliance is required.	
L3.1 – 3.3		The conditions which may be included under L3.1 - 3.3 have not been placed on this licence, therefore no assessment of compliance is required.	
L4.1		The condition which may be included under L4.1 has not been placed on this licence, therefore no assessment of compliance is required.	
L5		The condition which may be included under L5 has not been placed on this licence, therefore no assessment of compliance is required.	
L6		The condition which may be included under L6 has not been placed on this licence, therefore no assessment of compliance is required.	

\* See explanation of risk assessment of non-compliances codes on p3.



<b>4</b>	<b>OPERATING CONDITIONS</b>		
	<i>The audit assessment is based upon evidence relating to the period limited to the 24 hours prior to the end of the audit inspection.</i>		
O1.1	Yes		
O2.1	Yes		
<b>5</b>	<b>MONITORING AND RECORDING CONDITIONS</b>		
	<i>The audit assessment is based upon evidence relating to the period limited to the 12 months prior to the end of the audit inspection.</i>		
M1.1	Yes	See comments re conditions M1.2 and M1.3.	
M1.2	Yes	(a) Keeping records in a legible form.	
	Beyond the scope of the audit	(b) Keeping of records for a period of 4 years after the monitoring event. It is beyond the scope of the audit to assess if the records kept in relation to the required monitoring will be kept for a period of 4 years. However, the EPA has no reason to suspect that the records provided in relation to the monitoring undertaken will not be kept for a period of 4 years	
	Yes	(c) Producing records to authorised EPA officers on request.	
M1.3	Yes	(a) Keeping records of the date(s) samples were taken.	
	Yes	(b) Keeping records of the time(s) samples were taken.	
	Yes	(c) Keeping records of the point at which samples were taken.	
	Yes	(d) Keeping records of the person who collected the sample.	

\* See explanation of risk assessment of non-compliances codes on p3.



M2.1	Yes	<b>Nitrate and Nitrite</b>	
	Not Applicable	<b>Conductivity</b> "Probe" is stated as the required sampling method in the condition and this is not a sampling method unless it is prefixed with "in situ".	
M3.2	Yes		
M4.1	Not Applicable	No complaints have been received in the 12 months preceding the audit inspection.	
M4.2	Not Applicable	No complaints have been received in the 12 months preceding the audit inspection.	
M4.3	Beyond the scope of the audit	The condition is beyond the scope of the audit. However, the EPA has no reason to suspect that the records provided in relation to the monitoring undertaken will not be kept for a period of 4 years	
M4.4	Not Applicable	No complaints have been received in the 12 months preceding the audit inspection.	
M5.1	Yes		
M5.2	Yes		
M5.3	Not Applicable	This condition is a deeming clause that that determines the applicability of Conditions M5.1 and M5.2.	
M6.1	Not Applicable	The condition which may be included under M6.1 has not been placed on this licence, therefore no assessment of compliance is required.	
<b>6</b>	<b>REPORTING CONDITIONS</b> <i>The audit assessment is based upon evidence relating to the period limited to the 12 months prior to the end of the audit inspection.</i>		
R1.1	Yes		
R1.2	Yes		

\* See explanation of risk assessment of non-compliances codes on p3.



R1.3 – R1.4	Not Applicable	The licence has not been transferred from the licensee to a new licensee within the 12 months prior to the audit inspection and the licence has not been surrendered by the licensee or revoked by the EPA or Minister.	
R1.5	Yes		
R1.7	Not Applicable	The requirement to retain a copy of the Annual Return supplied to the EPA for a period of 4 years has not been on this licence for a period of 4 years.	
R1.8	Yes		
R1.9	This is a statement advising of persons who are approved by the EPA to sign the Annual Return. No assessment of compliance is required.		
R2.1 – R2.2	Not Applicable	The Licensee has indicated that they were not aware of any incidents causing or threatening material harm to the environment during the licence period.	
R3.1 – R3.4	Not Applicable	The EPA has not made a written request that the licensee prepare a written report on any event which caused, was causing or was likely to cause harm to the environment.	
<b>GENERAL CONDITIONS</b>			
<i>The audit assessment is based upon evidence relating to the period limited to the 24 hours prior to the end of the audit inspection.</i>			
G1.1	Yes		
G1.2	Yes		
G1.3	Yes		

\* See explanation of risk assessment of non-compliances codes on p3.



**APPENDIX A**  
**ENVIRONMENT PROTECTION LICENCE NO. 11393**



Environment Protection Authority

# Environment Protection Licence

Section 55 Protection of the Environment Operations Act 1997

- ♦ Licence number: 11393
- ♦ File number: 240072
- ♦ Licence Anniversary Date: 03-August
- ♦ Review date not later than 03-Aug-2004

## Licence Type

Premises

## Licensee

QAF MEAT INDUSTRIES PTY LTD  
 PO BOX 78  
 COROWA NSW 2646

## Licensed Premises

BUNGOWANNAH PIGGERY  
 Riverina Highway  
 BUNGOWANNAH NSW 2640

## Fee Based Activity

Pig Production (42)  
 Composting and Related Reprocessing or  
 Treatment (29)

## Scale

> 500 - T accommodated  
 0 - 5000 T received

## EPA Region

Murray  
 4th Floor, Albury City Council Chambers, 553 Kiewa Street  
 ALBURY NSW 2640  
 Phone: 02 6041 4963  
 Fax: 02 6041 4973

PO Box 544 ALBURY  
 NSW 2640



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## Information about this licence

### Dictionary

The licence contains a dictionary, which defines terms used in the licence. It is found at the end of the licence.

### Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- Ensure persons associated with you comply with this licence, as set out in section 64 of the Act.
- Control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act).
- Report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

### Transfer of licence

Transfer of the licence to another person may be requested by the licensee using the form for this purpose available from the EPA.

### Variation of licence conditions

Variations to the conditions of this licence may be requested by the licensee using the form for this purpose available from the EPA. The EPA may also vary a licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

### Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

### Licence review

The Act requires that the EPA review your licence at least every 3 years after the issue of the licence, as



set out in Part 3.6 of the Act. You will receive advance notice of the licence review. For licences held immediately before 1 July 1999, the first review will take place before 1 July 2002.

### **Fees and annual return to be sent to the EPA**

The licence requires you to forward to the EPA an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints).

The Annual Return must be submitted within 60 days after the end of each reporting period. Where a licence is transferred, surrendered or revoked, a special reporting period applies.

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Usually the licence fee period is the same as the reporting period.

See condition R1 and the accompanying form regarding the Annual Return requirements.

The EPA publication "A Guide to Licensing" contains information about how to calculate your licence fees.

### **Public register and access to monitoring data**

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications
- licence conditions and variations
- statements of compliance

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

Licence anniversary date

03-August

This licence is issued to

**QAF MEAT INDUSTRIES PTY LTD**  
**PO BOX 78**  
**COROWA NSW 2646**

subject to the conditions which follow:



# 1 Administrative conditions

## A1 What the licence authorises and regulates

A1.1 Not applicable.

A1.2 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

### Scheduled Activity

Composting and Related Reprocessings

Livestock Intensive Industries - pig

### Fee Based Activity

### Scale

Pig Production (42)

> 500 - T accommodated

Composting and Related Reprocessing or Treatment (29)

0 - 5000 T received

A1.3 Not applicable.

## A2 Premises to which this licence applies

A2.1 The licence applies to the following premises:

### Premises Details

**BUNGOWANNAH PIGGERY**

**Riverina Highway**

**BUNGOWANNAH**

**NSW**



Premises Details
2640
149
11706

**A3 Other activities**

A3.1 Not applicable.

**A4 Information supplied to the EPA**

A4.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:

- (a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998 and
- (b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

**2 Discharges to air and water and applications to land****P1 Location of monitoring/discharge points and areas**

P1.1 Not applicable.

P1.2 The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.

P1.3 The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.



*Water and land*

EPA identification no.	Type of monitoring point	Type of discharge point	Description of location
1	Ground water monitoring point 1		On hill side north of pig sheds
2	Ground water monitoring bore 2		On piggery driveway west of ponds
3	Groundwater monitoring bore 3		South of pondage system.
4	Groundwater monitoring bore 4		South of piggery pondage system.

### 3 Limit conditions

#### L1 Pollution of waters

- L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

#### L2 Load limits

- L2.1 Not applicable.  
 L2.2 Not applicable.

#### L3 Concentration limits

- L3.1 Not applicable.  
 L3.2 Not applicable.  
 L3.3 Not applicable.

#### L4 Volume and mass limits

- L4.1 Not applicable.

#### L5 Waste



## L6 Noise Limits

# 4 Operating conditions

## O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.

This includes:

- (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
- (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

## O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:  
(a) must be maintained in a proper and efficient condition; and  
(b) must be operated in a proper and efficient manner.

# 5 Monitoring and recording conditions

## M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:

- (a) in a legible form, or in a form that can readily be reduced to a legible form;
- (b) kept for at least 4 years after the monitoring or event to which they relate took place; and
- (c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:

- (a) the date(s) on which the sample was taken;
- (b) the time(s) at which the sample was collected;
- (c) the point at which the sample was taken; and
- (d) the name of the person who collected the sample.

## M2 Requirement to monitor concentration of pollutants discharged



- M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:

<i>Water and Land</i>				
<b>POINTS 1,2,3,4</b>	<b>Pollutant</b>	<b>Units of measure</b>	<b>Frequency</b>	<b>Sampling Method</b>
	Conductivity	uS/cm	Quarterly	Probe
	Nitrate + nitrite (oxidised nitrogen)	mg/L	Quarterly	Grab sample

### **M3 Testing methods - concentration limits**

- M3.1 Not applicable.
- M3.2 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

### **M4 Recording of pollution complaints**

- M4.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.
- M4.2 The record must include details of the following:
- the date and time of the complaint;
  - the method by which the complaint was made;
  - any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
  - the nature of the complaint;
  - the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
  - if no action was taken by the licensee, the reasons why no action was taken.

M4.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M4.4 The record must be produced to any authorised officer of the EPA who asks to see them.

### **M5 Telephone complaints line**

- M5.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.



M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M5.3 Conditions M5.1 and M5.2 do not apply until 3 months after:  
(a) the date of the issue of this licence or  
(b) if this licence is a replacement licence within the meaning of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, the date on which a copy of the licence was served on the licensee under clause 10 of that regulation.

## M6 Requirement to monitor volume or mass

M6.1 Not applicable.

## 6 Reporting conditions

### R1 Annual return documents

#### What documents must an Annual Return contain?

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:  
(a) a Statement of Compliance; and  
(b) a Monitoring and Complaints Summary.  
A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

#### Period covered by Annual Return

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee,  
(a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and  
(b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.



- R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on
- (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
  - (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

### **Deadline for Annual Return**

- R1.5 The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

### **Notification where actual load can not be calculated**

- R1.6 Not applicable.

### **Licensee must retain copy of Annual Return**

- R1.7 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

### **Certifying of Statement of Compliance and Signing of Monitoring and Complaints Summary**

- R1.8 Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
- (a) the licence holder; or
  - (b) by a person approved in writing by the EPA to sign on behalf of the licence holder.
- R1.9 A person who has been given written approval to certify a certificate of compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review of this licence.

### **R2 Notification of environmental harm**

Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

- R2.1 Notifications must be made by telephoning the EPA's Pollution Line service on 131 555.
- R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

### **R3 Written report**

- R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:



- (a) where this licence applies to premises, an event has occurred at the premises; or
  - (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
- and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

- R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.
- R3.3 The request may require a report which includes any or all of the following information:
- (a) the cause, time and duration of the event;
  - (b) the type, volume and concentration of every pollutant discharged as a result of the event;
  - (c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; and
  - (d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
  - (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
  - (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event;
  - (g) any other relevant matters.
- R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

## General conditions

### G1 Copy of licence kept at the premises

- G1.1 A copy of this licence must be kept at the premises to which the licence applies.
- G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.
- G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

## Pollution studies and reduction programs



## Special conditions

## Dictionary

### General Dictionary

In this licence, unless the contrary is indicated, the terms below have the following meanings:

<b>3DGM [in relation to a concentration limit]</b>	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
<b>Act</b>	Means the Protection of the Environment Operations Act 1997
<b>activity</b>	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
<b>actual load</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
<b>AMG</b>	Australian Map Grid
<b>anniversary date</b>	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
<b>annual return</b>	Is defined in R1.1
<b>Approved Methods Publication</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
<b>assessable pollutants</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
<b>BOD</b>	Means biochemical oxygen demand
<b>COD</b>	Means chemical oxygen demand
<b>composite sample</b>	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
<b>cond.</b>	Means conductivity
<b>environment</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>environment protection legislation</b>	Has the same meaning as in the Protection of the Environment Administration Act 1991
<b>EPA</b>	Means Environment Protection Authority of New South Wales.
<b>fee-based activity classification</b>	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 1998.
<b>flow weighted composite sample</b>	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
<b>grab sample</b>	Means a single sample taken at a point at a single time



<b>hazardous waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>industrial waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>inert waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>licensee</b>	Means the licence holder described at the front of this licence
<b>load calculation protocol</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
<b>local authority</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>material harm</b>	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
<b>MBAS</b>	Means methylene blue active substances
<b>Minister</b>	Means the Minister administering the Protection of the Environment Operations Act 1997
<b>mobile plant</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>motor vehicle</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>O&amp;G</b>	Means oil and grease
<b>percentile [in relation to a concentration limit of a sample]</b>	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
<b>plant</b>	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
<b>pollution of waters [or water pollution]</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>premises</b>	Means the premises described in condition A2.1
<b>public authority</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>regional office</b>	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
<b>reporting period</b>	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 months. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
<b>reprocessing of waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>scheduled activity</b>	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
<b>solid waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>treatment of waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>TSP</b>	Means total suspended particles
<b>TSS</b>	Means total suspended solids



<b>utilisation area</b>	Means any area shown as a utilisation area on a map submitted with the application for this licence
<b>waste</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>waste code</b>	Means the waste codes listed in Appendix 5 of the EPA document A Guide to Licensing Part B.
<b>waste type</b>	Means Group A, Group B, Group C, inert, solid, industrial or hazardous waste

Mr David Cook

Head Regional Operations Unit Murray

(By Delegation)

03-Aug-2001

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## End Notes

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**APPENDIX B**  
**ENTERPRISE RESPONSE TO DRAFT REPORT**



A.B.N. 53 004 892 835

Redlands Road, Corowa, N.S.W. 2646.  
Postal Address P.O. Box 78, Corowa N.S.W. 2646, Australia.

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QAF

Telephone (02) 6033 8333  
International (61 2) 6033 8333

Facsimile (02) 6033 3003  
International (61 2) 6033 3003

8 December 2003

Mr Grant Harper  
Senior Compliance Audit Officer  
Environmental Protection Authority  
PO Box A290  
Sydney South NSW 1232



**Compliance Audit- QAF Bungowannah Piggery**

Dear Mr Harper,

Thank you for providing QAF Meat Industries a draft compliance audit report dated November 2003. The draft report shows one area of non-compliance and two issues for further investigation. QAF has provided comments on these matters below.

**Non-Compliance**

Your comments in the draft were as follows:

*“date of sampling had not been recorded during one soil sampling event” (also mentioned in section M1.3 a of the report)*

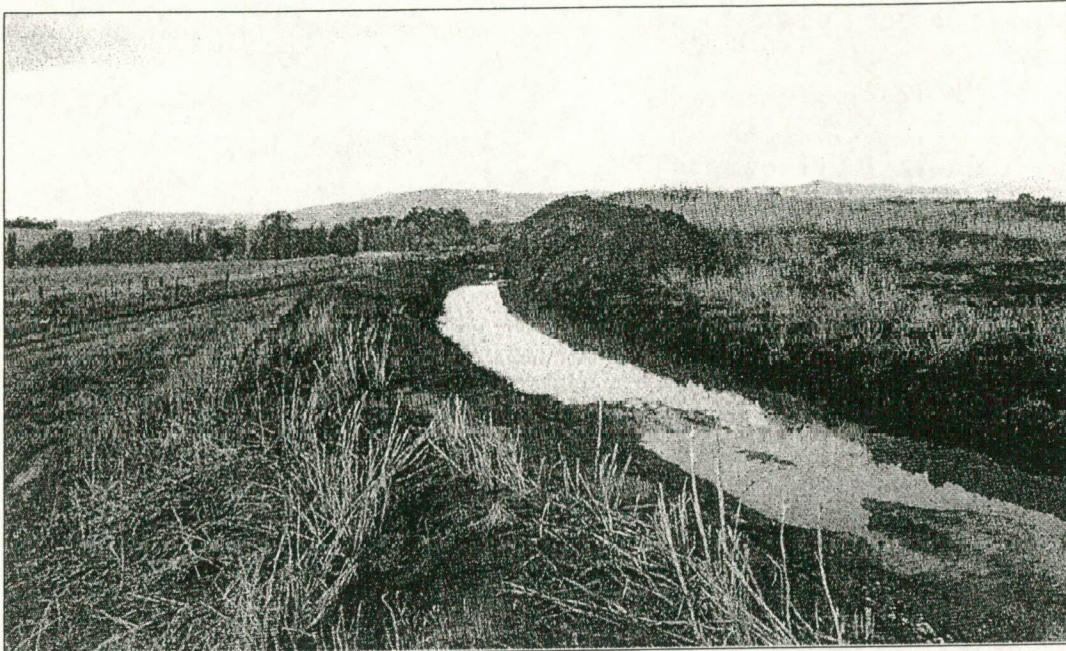
This is incorrect as QAF is not required, nor did it undertake any soil samples in June 2003. Groundwater samples were taken in June 2003 and the date was recorded on the bottles during sampling and reported on the laboratory report (*refer to Appendix 1*).



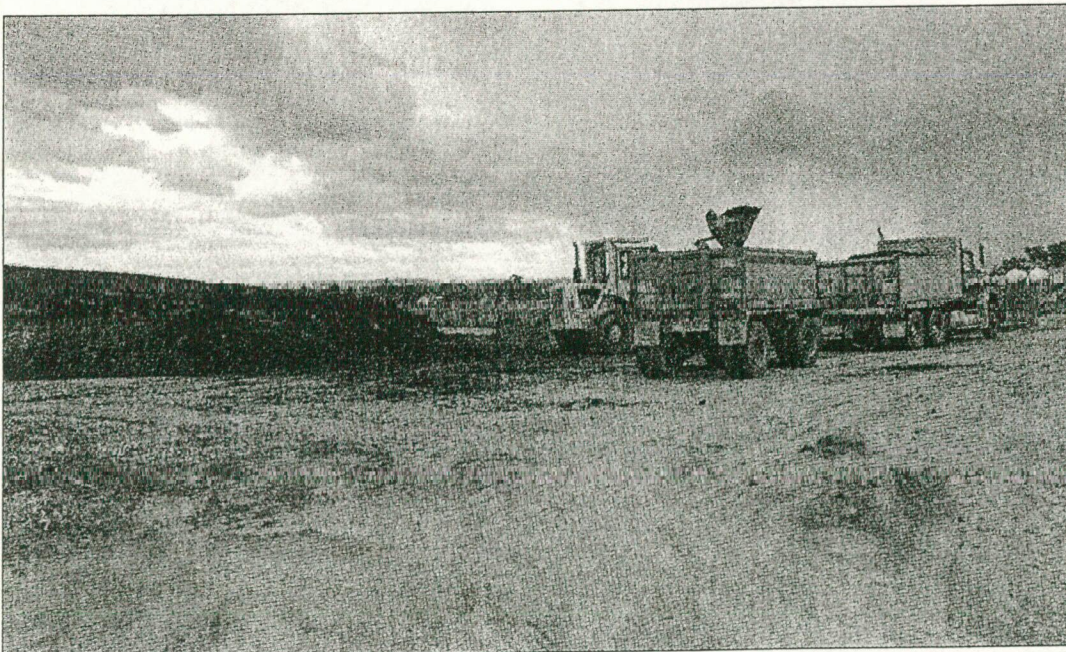
## Issues

### Solid Waste Management

Solid waste at the storage pad at the time of the audit was on top of the bund. QAF has since relocated the solids onto the pad and away from the bund wall (*refer to photo below*).



**Photo 1: Solid storage pad- solids moved away from bund wall (photo taken post heavy rainfall event 4 Dec 03)**



**Photo 2: Solids being taken offsite for vermiculture (4 Dec 2003)**



Groundwater

Diesel is stored in an underground tank onsite and QAF currently records the monthly usage and closing stock.

If you require any further information on the points above, please contact myself on 0260338216.

Yours sincerely

*A Crawford*

Amber Crawford  
Environmental Officer



**Appendix 1: Groundwater Results – June 2003**



CHEMISTRY LABORATORY



MDFRC REPORT N<sup>o</sup> : 0306006  
 MDFRC LAB N<sup>o</sup> : 03C1866/1871  
 DATE ISSUED : 14/7/2003

Ellis Street, Thurgoona, N.S.W  
 P.O. Box 921, Albury 2640.  
 Telephone (02) 6058 2300  
 FAX No.: (02) 6043 1626  
 International Fax No.:  
 +61 2 6043 1626  
 Email: John.Pengelly@csiro.au

ANALYSIS REPORT

This laboratory received on the 12<sup>th</sup> day of June 2003 from S Oates six samples for analysis, and declares that the results are as follows:

MDFRC LAB No	C1866	C1867	C1868	C1869	C1870	C1871
Piggery Location	Bungowannah					
Date	11/6/2003					
Sampler	S.Oates					
Sample Id	Piezometer 2 19.23m	Piezometer 3 19.32m	Piezometer 4 12.74m	Small Bore	Piezometer 5 17.14m	Piezometer 6 17.53m
Specific Conductance us/cm@ 25°C	1450	2350	1150	1600	3650	2500
Total Dissolved Solids mg/L	910	1300	720	910	2050	1350
Sodium as mgNa/L	140	315	88	235	350	255
Ammonia as mgN/L	0.08	<0.01	0.01	<0.01	0.51	0.02
Total Phosphorus as mgP/L	0.21	0.31	0.17	0.11	0.26	0.37
Nitrate Nitrogen as mgN/L	1.2	1.2	2.7	1.7	0.11	30
Nitrite Nitrogen as mgN/L	<0.01	0.01	0.01	<0.01	0.01	<0.01

These samples were analysed as received and determined by the following methods:

MDFRC 2  
 MDFRC 3  
 MDFRC 6  
 MDFRC 9

Ammonia Nitrogen  
 Oxides of Nitrogen  
 Total Phosphorus  
 Specific Conductance

MDRFC 11  
 MDFRC 14

Solids  
 Sodium by AAS

ANALYST.....

J. PENGELLY