



28 November 2011

Nicholas Hall
NSW Department of Planning
Major Development Assessment
23-33 Bridge St.
SYDNEY 2000

Dear Nicholas,

Re: Request to modify major project modification application, Coca Cola Amatil PET (M_ 10_0125), Eastern Creek

1.0 Introduction

This statement of environmental assessment is to accompany a modification application to NSW Department of Planning in accordance with Section 75W of the *Environmental Planning and Assessment (EP&A) Act 1979*.

This statement identifies the consent, describes the modifications proposed and provides an assessment of the likely impacts of the proposal in terms of relevant matters for consideration.

The modification proposed is 'to delete condition 19' of the approval.

2.0 The Site

The site is located at 9 Roussell Road Eastern Creek, Lot 251 DP 1082988 in the Blacktown Local Government Area (See Fig 1). On 18th April 2011 the Department of Planning granted project approved under the part 3 act (MP 10_0125) for the following:

"Coca Cola Amatil Preform and Closure Manufacturing Facility"

3.0 Project status

Construction of the facility is currently almost complete, Coca Cola Amatil are currently installing their equipment as we await occupational certificate.

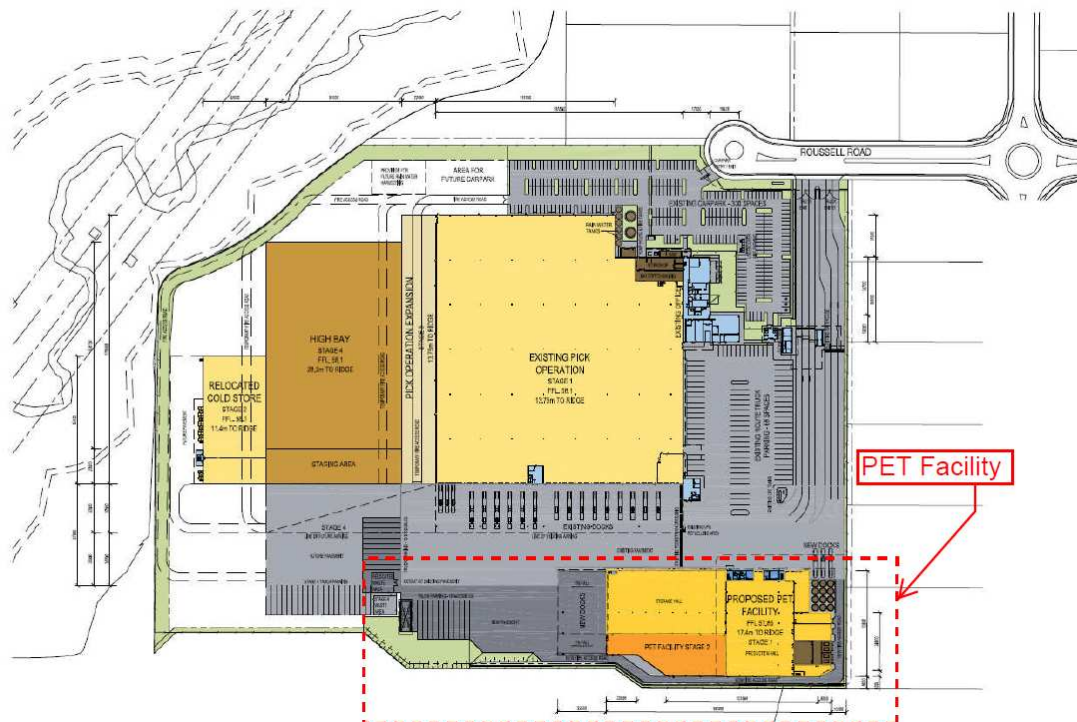


Fig. 1 Location Plan

4.0 Proposed Modification

The modification proposed is 'to delete condition 19' of the approval, the condition currently reads;

Air Emissions

19 - Prior to the commencement of operations, the Proponent shall install an extraction and afterburner system, as described in the EA, to capture and treat the Volatile Organic Compounds (VOCs) emitted from the printing process. The design of the extraction system should be consistent with AS 1668 The Use of Ventilation and Air Conditioning in Buildings Part 1 and 2.

Goodman request that the condition be deleted as is not applicable to this project.

Appendix 2 of the approval 'statements of commitments' Item number 2 *Air quality* reads;

- | | |
|----------------|--|
| 2. Air quality | The proponent will install an extraction system to capture the Volatile Organic Compounds (VOCs) emitted from the printing process. The extraction system will incorporate an afterburner if required to mitigate VOCs within the air stream, in compliance with the consultation advice received from DECCW. The design of the extraction system will consider AS 1668 <i>The Use of Ventilation and Air Conditioning in Buildings, Part 1 and 2.</i> |
|----------------|--|

The statement of commitments notes that the afterburner should be installed 'if required'. The investigation carried out by Goodman concludes that the after burner is not required.

5.0 Evidence and outcomes of consultation with relevant agencies

Goodman engaged *SLR Consulting Australia Pty Ltd* to prepare a Process Emissions Impact Assessment to review the impact from the process emissions produced from the closure printing process at the PET facility, which considers the worst case scenario of potential VOC discharge when all installation phases are complete.

The report prepared by SLR concludes that it is recommended that an afterburner is not considered appropriate technology for emissions controls at the CCA facility, and it would represent an inefficient and unsustainable use of natural resources.

CCA had consultations with the office of environment (OEH) to discuss the requirement of the after burner, it is our understanding that the OEH agrees with the outcome of the SLR report which notes that the after burner is not required.

6.0 Conclusion justifying the proposed modification

This Section 75W of the *Environmental Planning and Assessment (EP&A) Act 1979* is to modify development consent MP 10_0125 for Coca Cola Amatil Preform and Closure Manufacturing Facility at 9 Roussell Road Eastern Creek (Lot 251 DP 1092988). In accordance with Section 75W of the Act, it is submitted that:

- The proposed modification will have no environmental impact.

Given the above, we request that the Department approves the Section 75W application by deleting condition 19.

Should you require further information, please do not hesitate to contact the undersigned.

Sincerely,



Nelma Arancibia
Project Manager
Nelma.arancibia@goodman.com
0424 186 127