



Snowy Hydro Limited Kurri Kurri Power Station Operational Environmental Management Plan

Revision No.: 5.1

Revision Date: 17 November 2025

snowyhydro

Acknowledgement of Country

Snowy Hydro acknowledges the traditional custodians of Wonnarua Country, where this Operational Environmental Management Plan applies. We pay our respects to Elders of the past, present, and emerging for they have, are, and will leave their footprints behind and continue to share their history, culture and traditions.

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Table of Contents

Acknowledgement of Country.....	2
Document Control.....	3
Abbreviations & Glossary of Terms.....	7
1.0 Introduction.....	9
1.1 Purpose & Scope.....	9
1.2 Environmental Management Framework.....	10
2.0 Overview.....	12
2.1 Location.....	12
2.2 Existing Environment and Surrounding Land Use.....	14
2.3 Sensitive Receptors.....	15
2.4 Site Operations.....	19
2.5 Key Site Components and Features.....	21
2.6 Environmental Policy.....	23
3.0 Compliance Requirements.....	24
3.1 SSI Approval.....	24
3.2 SSI Approval Modifications.....	36
3.3 Environment Protection Licence.....	38
3.4 EPBC Approval.....	40
3.5 Related Projects.....	41
3.6 Legislative Requirements.....	41
3.7 Tracking Compliance.....	44
4.0 Environmental Governance.....	45
4.1 Aspects, Impacts and Risk.....	45
4.2 Environmental Management Responsibilities.....	45
4.2.1 Environmental Representative.....	48
4.3 Reporting and Notification Requirements.....	50
4.3.1 Environmental Incidents - Internal Reporting.....	50
4.3.2 Environmental Incidents - External Reporting.....	50
4.3.2a External Non-compliance Notification.....	51
4.3.2b Annual Compliance Report.....	52
4.3.3 Statutory Environmental Reporting and Notifications.....	52
4.4 Training.....	58
5.0 Environmental Management Measures.....	59
5.1 Air Quality.....	61
5.2 Water.....	61
5.2.1 Spill Response Plan.....	62
5.3 Noise.....	62
5.4 Biodiversity.....	62
5.5 Cultural Heritage.....	63
5.5.1 Non-Aboriginal Heritage.....	63
5.6 Waste.....	63
5.7 Traffic.....	63

Document is uncontrolled when downloaded or printed

5.8 Hazardous Materials.....	63
5.9 Bushfire Risk.....	64
5.10 Aviation.....	65
5.11 Visual and Lighting.....	66
5.12 Pollution Incident Response Management Plan (PIRMP).....	66
5.13 Net Zero Power Generation Plan.....	67
6.0 Community.....	68
6.1 Snowy Hydro Website.....	68
6.2 Community Enquiries, Complaints and Feedback.....	68
6.2.1 Community Complaints Management Protocol.....	69
7.0 Audits and Inspections.....	71
7.1 Regular Site Based Inspections.....	71
7.2 Internal Audits.....	71
7.3 External Audits.....	72
7.3.1 SSI Independent Compliance Audit.....	72
7.3.2 SSI Independent Site Hazard Audit.....	72
7.3.3 EPBC Independent Audit.....	73
7.3.4 Environmental Management System.....	73
7.4 Monitoring Programs.....	73
8.0 Documentation.....	75
8.1 Document Control.....	75
8.2 Record Keeping.....	75
9.0 Document Review.....	76
9.1 Document Submission Timeframes.....	77
Appendix A: EPL21627 & SSI Approval Monitoring Locations.....	78
Appendix B: Kurri Kurri Lateral Pipeline Location.....	80
Appendix C: Environmental Representative Endorsement.....	81
Appendix D: Environment Mitigation Measures - Operations.....	83

Abbreviations & Glossary of Terms

Abbreviation/Term	Definition
ACH	Aboriginal Cultural Heritage
AHD	Australian Height Datum
APZ	Asset Protection Zone
ASS	Acid Sulfate Soils
BDAR	Biodiversity Development Assessment Report
Capacity Factor	A measure of the power stations actual, or approved output, over a nominal period (usually a year)
CEMS	Continuous Emissions Monitoring System
CGS	Clean, Green Safe - this is the name of Snowy Hydro Limited's integrated management system
Commissioning	Program of testing and certification of all Project components, systems, and processes to demonstrate the Project can operate to the required standards before commencing operation
Commencement of Operations	The date where Snowy Hydro Limited received operational handover from the principal contractor of the Hunter Power Project
dBA	Decibel: A-weighted, approximates the sensitivity of the human ear
DECC	The former NSW Department of Environment and Climate Change
Department	Same meaning as Department under the EP&A Act
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure (formerly DPIE)
DPHI Secretary	See Secretary
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	NSW Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPBC Approval	For KKPS, refers to the approval granted to EPBC referral number 2021/8888
EPL	Environment Protection Licence
ER	The independent Environmental Representative appointed by Snowy Hydro and approved by the Planning Secretary prior to the commencement of HPP
ERH	Emergency Response Handbook
GIS	Geographic Information System
GT	Gas Turbine
HPP	Hunter Power Project, the project that constructed and commissioned KKPS
HPS	Hunter Power Station, now known as Kurri Kurri Power Station
ICAM	Incident Cause Analysis Method

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ISO	International Organisation for Standardisation
KKPS	Kurri Kurri Power Station
kL	kilolitre
MW	Megawatt
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
OEMP	Operational Environment Management Plan
OSOM	Oversize overmass (heavy vehicle transport)
PIRMP	Pollution Incident Response Management Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Proponent	Snowy Hydro Limited
RAP	Registered Aboriginal Parties
RFS	NSW Rural Fire Service
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Secretary	Planning Secretary under the EP&A Act, or nominee
Sensitive Receptor	A location where people are likely to work or reside; this may include a dwelling, school, hospital, office, or public recreational area (EPA 2016)
SFAZ	Strategic Fire Advantage Zone
SSI	State Significant Infrastructure
SSI Approval	For KKPS, this refers to the State Significant Infrastructure Approval SSI-12690060,, and subsequent modifications to this approval
TJ	Terajoule
TfNSW	Transport for NSW
WM Act	<i>Water Management Act 2000</i>

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1.0 Introduction

This Operational Environmental Management Plan (OEMP) has been developed for the Kurri Kurri Power Station (KKPS), previously referred to as the Hunter Power Project.

On 12 December 2020, KKPS was declared as a critical State Significant Infrastructure project by order under Clause 12 of Schedule 5 of *State Environmental Planning Policy (State and Regional Development) 2011*.

On 17 December 2021, State Significant Infrastructure Application 12590060 (SSI-12590060) for KKPS was approved by the Minister for Planning and Public Spaces pursuant to section 5.19 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Additional to the State Significant Infrastructure approval, EPBC Referral Number 2021/8888 for KKPS was approved under section 130(1), and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) by the Federal Minister for the Environment on 6 February 2022.

1.1 Purpose & Scope

The purpose of the OEMP is to provide a single document reference that ensures the effective implementation of KKPS' environmental commitments, reporting, controls and mitigation measures specified in:

- The KKPS Environmental Impact Statement (EIS)
- Any written directions from the NSW Secretary of the Department of Planning, Housing and Infrastructure (DPHI Secretary);
- The conditions of NSW Infrastructure Approval SSI-12590060 (SSI Approval), specifically Condition C1 (Environmental Management Strategy), and C21 (Updating and Staging of Studies, Strategies and Plans);
- The conditions of Environment Protection Licence 21627 (EPL21627), and;
- The conditions of the Federal EPBC Approval 2021/8888 (EPBC Approval).

Should there be any inconsistency between the EIS, any written directions from the DPHI Secretary, or the conditions of the SSI Approval, the most recent document prevails to the extent of the inconsistency. However as per condition A3 of the SSI Approval, the conditions of the SSI Approval prevail to the extent of any inconsistency.

Condition C1 of the SSI Approval, requires Snowy Hydro Limited (Snowy Hydro), as the proponent of KKPS, to prepare an Environmental Management Strategy (this OEMP), to the satisfaction of the Secretary (of DPHI), and implement the approved Environmental Management Strategy.

Furthermore, Condition C2 of the SSI Approval requires Snowy Hydro to prepare a Net Zero Power Generation Plan for KKPS to the satisfaction of the Secretary prior to the commencement of operations.

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Revision: 5.1	Snowy Hydro Limited - Kurri Kurri Power Station Operational Environmental Management Plan	Page 9 of 84

Previous versions of the Environmental Management Strategy, have been developed and approved for construction and commissioning activities of KKPS, however as per Condition C21 of the SSI Approval (Staging of Plans) this version of the Environmental Management Strategy (OEMP) is for KKPS operations.

This OEMP has been prepared in accordance with the [Environmental Management Plan Guideline - Guideline for Infrastructure Projects](#) (Department of Planning, Industry and Environment, April 2020).

KKPS environmental management plans that are required for operations have been developed as sub-plans to this OEMP, and sit within the overall KKPS environmental management framework as per **Figure 1.1**.

Through the effective implementation of this OEMP and associated sub-plans, Snowy Hydro shall ensure that throughout KKPS operations, all plant and equipment used onsite, or connected with the facility is both maintained in a proper and efficient condition, and operated in a proper and efficient manner.

1.2 Environmental Management Framework

Snowy Hydro's integrated management system incorporates Health, Safety, Environment, Quality and Asset Management frameworks to meet business requirements. The system is referred to within Snowy Hydro as the Clean, Green and Safe (CGS) Management System, and conforms to:

- ISO 9001 Quality Management Systems
- ISO 14001 Environmental Management Systems
- ISO 45001 Occupational Health & Safety Management System
- ISO 55001 Asset Management Systems

Snowy Hydro currently maintains certification of its CGS Management System to ISO9001, ISO14001, and ISO45001.

This OEMP and associated sub-plans are underpinned by, and align with the wider CGS Management System.

Figure 1.1 illustrates how the KKPS OEMP, sub-plans, and associated plans, relate to the overall Snowy Hydro CGS framework.

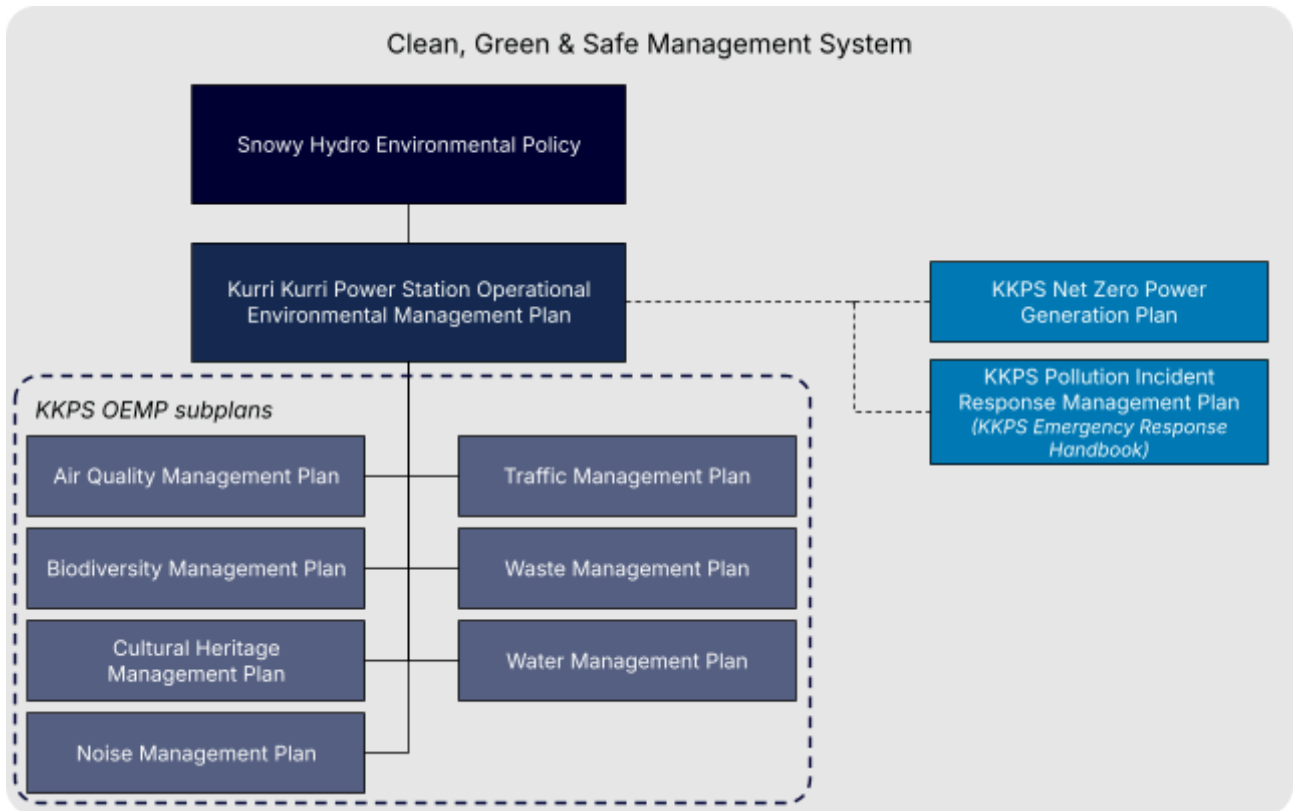


Figure 1.1: Kurri Kurri Power Station OEMP framework and relationship to the Snowy Hydro CGS Management System

2.0 Overview

2.1 Location

KKPS is located at Loxford, near Kurri Kurri, New South Wales (NSW), within the Cessnock City Council Local Government Area (refer to **Figure 2.1**, and **Figure 2.2**). The facility has been constructed on the site of the former Kurri Kurri Aluminium Smelter, which operated from 1969 to late 2012, closing in 2014.

The approved project boundary for KKPS, as specified in the SSI Approval and EPBC approval incorporates:

- Lot 1 DP1276814: consisting of the majority of the KKPS Plant
- Lot 2 DP1286098: consisting of hardstand and grassed buffer land, south of the main plant area

Since the SSI and EPBC Approvals were granted, Part Lots 319 and 769 of DP755231, which are referenced in the instruments of approval, have been subdivided into the current land parcels listed above.

The EPL boundary, although similar to the approved project boundary specified in the SSI and EPBC Approvals, excludes Lot 2 DP1286098, and the south west portion of Lot 1 DP1276814.

Figure 2.3 presents the SSI & EPBC Approval boundary for KKPS, overlaid with the EPL boundary.

The site address is 1 Hart Road, Loxford, and is approximately 1.2km from the M15 Hunter Expressway. The site is accessed via Hart Road.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 12 of 84

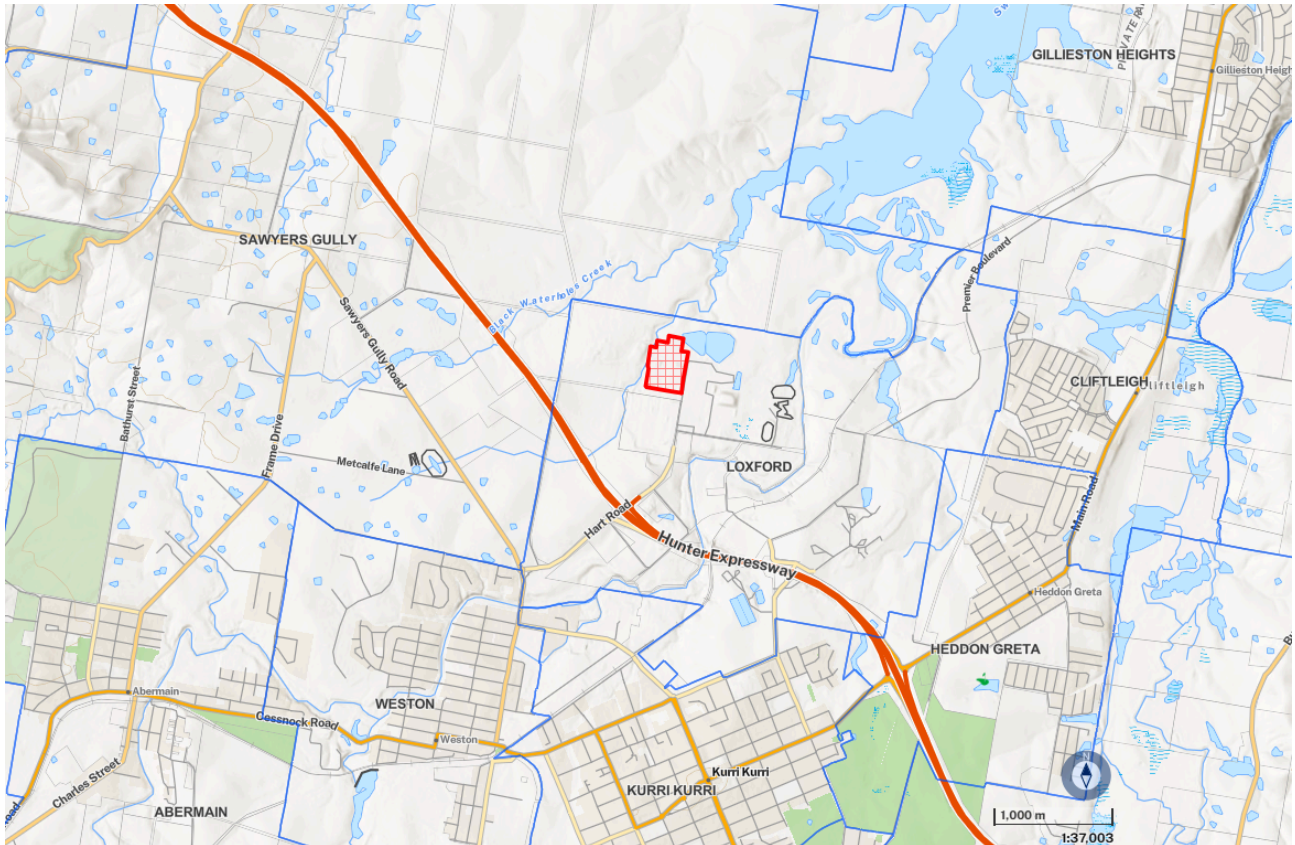


Figure 2.1: Location of the Kurri Kurri Power Station within the regional context (image source: NSW Spatial Services, SDT Explorer)

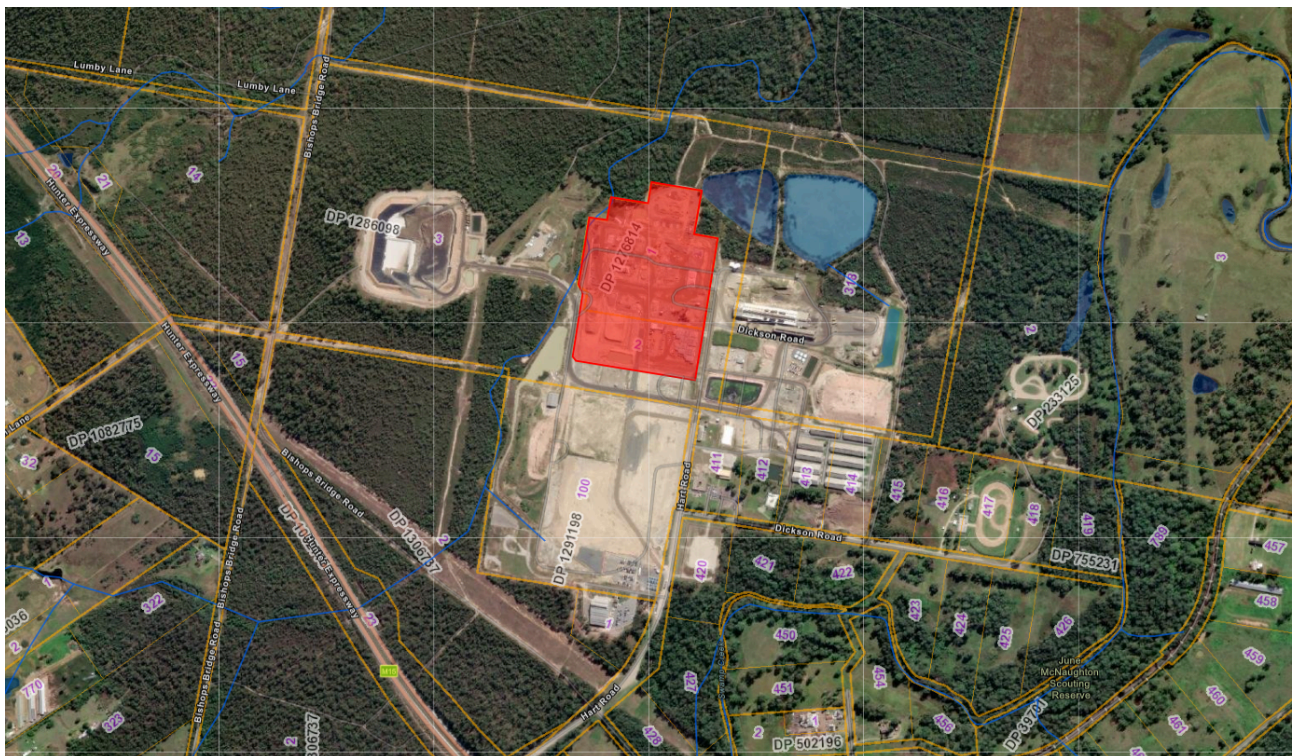


Figure 2.2: Local context of Kurri Kurri Power Station (image source: NSW Spatial Services, SDT Explorer)

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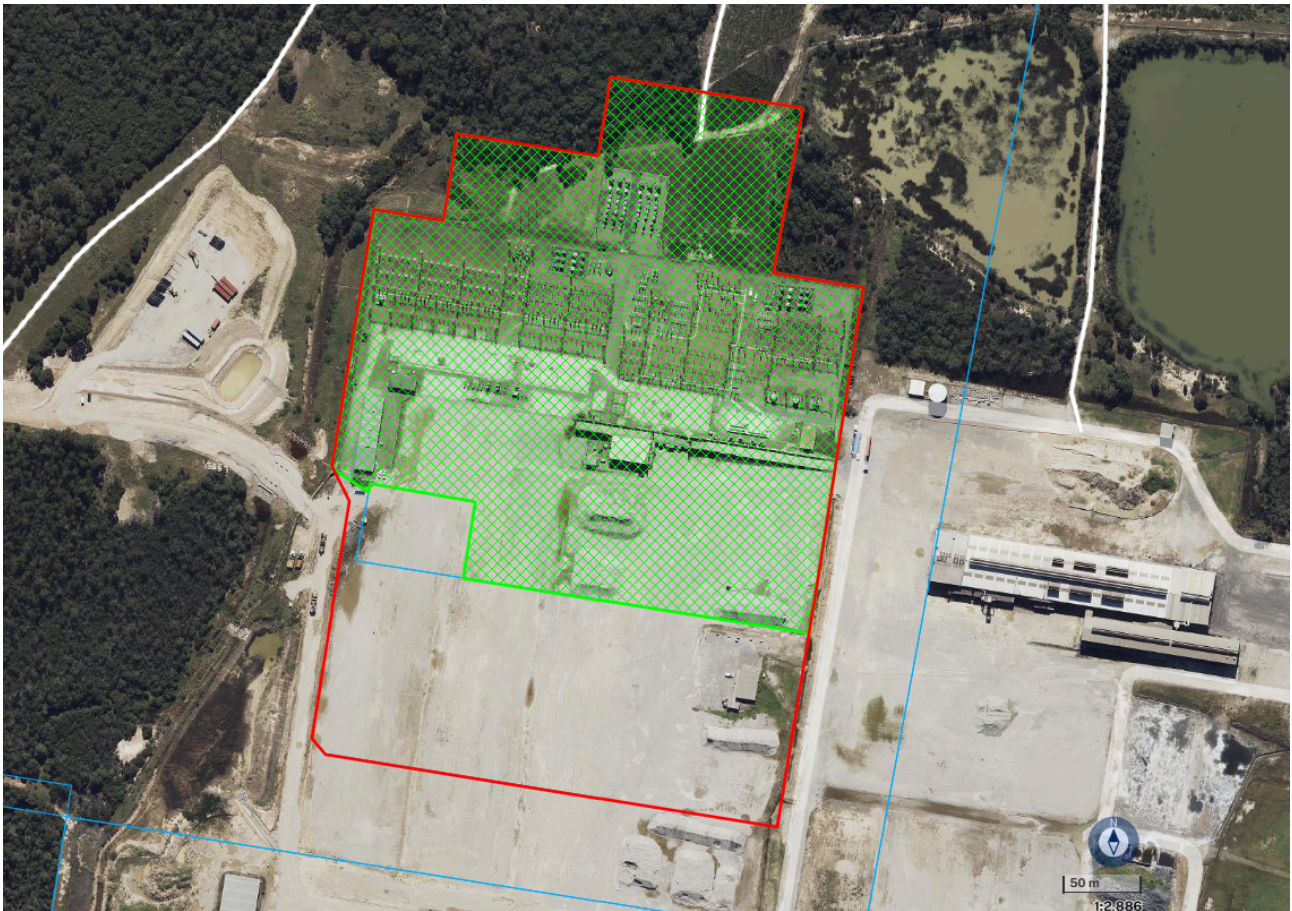


Figure 2.3: Kurri Kurri Power Station boundaries as identified in the SSI and EPBC Approvals (red outline), and EPL21627 (green hatch), (image source: NSW Spatial Services, SDT Explorer)

2.2 Existing Environment and Surrounding Land Use

KKPS is located entirely within a former industrial area, on land formerly occupied by the Kurri Kurri aluminium smelter, which ceased operations in 2012, and closed permanently in 2014.

Land use surrounding the Project Site is described as follows:

- To the west of KKPS is Sawyers Gully, a predominantly rural locality consisting of bushland, farmland and isolated residential dwellings. The Hunter Expressway divides the locality from the NW to the SE, with a number of dwellings in close proximity to the southern side of the roadway.
- Immediately south and east of KKPS is the suburb of Loxford. The south-western extent of Loxford, directly south of KKPS, comprises of sparsely distributed residential dwellings with some industrial facilities. The eastern area of Loxford comprises of sparsely distributed residential dwellings and the TAFE NSW - Kurri Kurri Campus.
- Further east of Loxford are the townships of Cliftleigh and Heddon Greta, which are predominantly residential and commercial properties. The township also features a number of new and proposed residential developments.

- To the northeast of KKPS, the area of Gillieston Heights comprises of a mixture of a residential township, isolated rural dwellings and farmland. Notably in Gilleston Heights are new and proposed residential developments in the southern extent of the suburb, which will reduce the distance between the residential area of Gilleston Heights to KKPS.
- South of KKPS and Loxford is the suburb of Kurri Kurri. In the northern extent of Kurri Kurri (the area closest to KKPS) is an existing industrial area, with the township of Kurri Kurri located further south, which is predominantly residential and commercial.

To the immediate north, east and west of KKPS are stretches of native woodland. Beyond the native woodland to the north and east is low-lying open rural farmland located on the fringe of the Hunter River floodplain. Although KKPS sits above known flood levels, it is positioned adjacent to the Hunter River floodplain, and is surrounded by the following watercourses:

- An unnamed tributary of Black Waterholes Creek, located immediately to the west of the KKPS, which flows from south to north.
- Swamp Creek, located 900m to the east of KKPS, which flows in a northward direction
- Both Black Waterholes Creek and Swamp Creek drain to Wentworth Swamp about 1.5km north of KKPS, which drains to the Hunter River at Maitland.

Peak flood depths for the watercourses surrounding KKPS are influenced by Hunter River flooding, rather than flooding from Black Waterholes Creek and Swamp Creek. The KKPS site is elevated above the Hunter River's probable maximum flood level.

2.3 Sensitive Receptors

Table 2.1 below provides a summary of the nearest sensitive receivers, their proximity to KKPS, and the impact pathways that may have the potential to impact on these locations. **Figure 2.4** presents these locations in a plan. The sensitive receivers were largely identified in the KKPS Environmental Impact Statement (Jacobs 2021), and are considered representative of locations that may have the potential to experience impact from the operational activities at KKPS. The potential impacts identified in **Table 2.1** are described in further detail, along with the mitigative and management measures, in the specific sub-plan to this OEMP.

Table 2.1: Summary of sensitive receiver locations relevant to Kurri Kurri Power Station

Description	Location	Proximity to KKPS	Reference	Potential Impact Pathway
Nearest Hospital	Kurri Kurri Hospital	4.4km, SSW	H1	Air Emissions
Nearest School/ Childcare Facilities	Kurri Kurri High School	2.5km, SSE	S1	Air Emissions
	Tafe NSW, Kurri Kurri	1.8km, SE	S2	Air Emissions
	Weston Public School	2.9km, SSW	S3	Air Emissions
	Gilleston Public School	6.2km, NE	S4	Air Emissions
	Baby Owls Family Day Care, Heddon Greta	3.2km, SE	S5	Air Emissions
	Tilly's Play & Development Centre, Kurri Kurri	2.9km, S	S6	Air Emissions
Nearest Residences	6 Dawes Avenue, Loxford	0.9km, SSE	R1	Air Emissions
	14 Horton Road, Loxford	1.2km, S	R2	Air Emissions
	6 Bowditch Avenue, Loxford	1.5km, SE	R3	Air Emissions
	20 Bowditch Avenue, Loxford	1.5km, ESE	R4	Air Emissions, Noise Emissions (NM3)
	30 Moorebank Road, Clifftleigh	3.1km, E	R5	Air Emissions
	10 Howe Street, Heddon Greta	2.8km, E	R6	Air Emissions
	7 Errol Crescent, Heddon Greta	2.9km, ESE	R7	Air Emissions
	532 Main Road, Clifftleigh	4.1km, ENE	R8	Air Emissions
	464 Cessnock Road, Gillieston Heights	3.3km, NE	R9	Air Emissions, Noise Emissions (NM4)
	21 Acacia Street, Kurri Kurri	2.5km, SE	R10	Air Emissions
	7 Currawong Close, Weston	2.0km, SW	R11	Air Emissions
	103 Bishops Bridge Road, Sawyers Gully	1.1km, SW	R12	Air Emissions, Noise Emissions (NM1)
	146 Sawyers Gully Road, Sawyers Gully	1.8km, WSW	R13	Air Emissions
	78 Lumby Lane, Sawyers Gully	1.9km, WNW	R14	Air Emissions
	10 Dawes Avenue, Loxford	1.0km, SSE	R15	Air Emissions, Noise Emissions (NM2)
	60 Metcalf Lane, Sawyers Gully	2.3km, SW	R16	Noise Emissions (NM5)
Nearest Public Recreational/ Access Areas	Kurri Kurri Speedway Club	0.9km, SE	P1	Air Emissions
Nearest Surface Water	Unnamed tributary of Black Waterholes Creek	<0.05km, W	SW1	Surface Water Discharges Stormwater Discharge point from KKPS
	Swamp Creek	0.65km, SE	SW2	Surface Water Discharges
	Wentworth Swamp	2.0km, NE	SW3	Surface Water Discharges

Description	Location	Proximity to KKPS	Reference	Potential Impact Pathway
Groundwater	Based on NSW EPA groundwater-sensitive zone mapping, KKPS does not appear to be located within a groundwater sensitive zone	Groundwater Sensitive Zones Map	N/A	Surface Water Discharges Discharges/spills/leaks in non-containment areas
Flood area	Although adjacent to floodplain areas and small sections of KKPS that are indicated to be within the extent of the probable maximum flood level, the site elevation ensures it is beyond the Hunter River's maximum probable flood level	Cessnock City Council Intramaps	N/A	Surface Water Discharges
Cultural Heritage	Based on search results of the Aboriginal Heritage Information Management System (AHIMS), predictive modelling, and archaeological surveys conducted by Representative Aboriginal Parties (RAPs), no impacts to Aboriginal Heritage are expected during the operation of KKPS	Five AHIMS Sites within 300m of the KKPS boundary, with no sites within the KKPS site	N/A	No impacts expected, as no earthworks at depth in the alluvium layers are anticipated during operations.
	No items of non-indigenous heritage have been identified within or in close proximity to KKPS	N/A	N/A	N/A
Flora and Fauna	The operational area of the site is fully fenced and covered in hardstand. The APZ area immediately outside the fenced area is also hardstand. Based on SAI (Serious and irreversible impact) assessment, no potential threatened entities are at risk of extinction from KKPS.	N/A	N/A	APZ Maintenance
	Adjacent to the northern boundary of KKPS is Plant Community Type 1633 (PCT1633)- <i>Parramatta Red Gum – Narrow-leaved Apple – Prickly-leaved Paperbark shrubby woodland in the Cessnock-Kurri Kurri area</i> , which is listed as an Endangered Ecological Community under the <i>Biodiversity Conservation Act 2016</i> .	Adjacent to northern KKPS boundary, with low growth in APZ area, which is regularly maintained	N/A	APZ Maintenance
	Surrounding KKPS are areas of significant biodiversity value, with native vegetation providing habitat for critically endangered species, including the Swift Parrot and Regent Honeyeater.	Adjacent to northern KKPS boundary	N/A	APZ Maintenance

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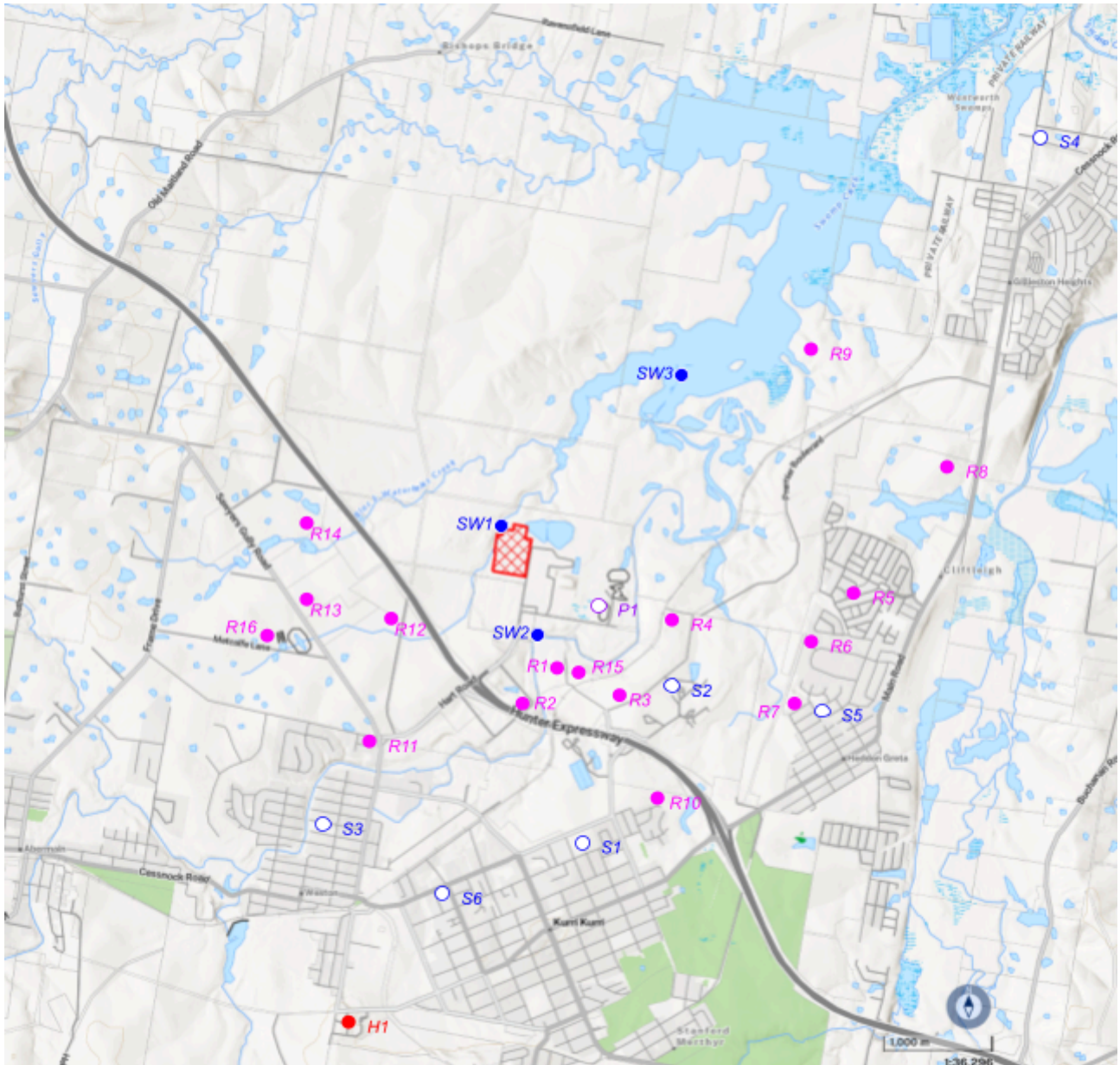


Figure 2.4: Sensitive receivers surrounding Kurri Kurri Power Station (image source: NSW Spatial Services, SDT Explorer)

2.4 Site Operations

KKPS is a 660MW open cycle gas fired power station that operates as a ‘firming’ generation facility. It is capable of supporting the transition away from fossil fuel baseload generation, through the security of supplying electricity during periods of low and intermittent generation from renewable generators to maintain a reliable and stable National Electricity Market (NEM). It can also support the NEM at short notice and during times of peak demand, including unplanned supply shortages at other baseload generation facilities.

As per the project approval for KKPS, fuel burning equipment (i.e. each turbine) is limited to 1,100 hours of operation per calendar year (equivalent to a capacity factor of 12.5%). This operational limit also includes a maximum for electricity generation using diesel fuel of 175 hours (capacity factor of 2%).

The operation of KKPS enables:

- Increased capacity for new renewable generators to enter the NEM, and supporting the transition from emissions intensive baseload generation;
- Flexible, dispatchable electricity supply at relatively short notice during periods of peak demand;
- The use of the best available low emissions technologies, including capability to utilise hydrogen fuel (when commercially available), to minimise greenhouse gas intensity; and
- Generation that meets current and future energy demands in a manner that is market competitive and socially acceptable.

In certain circumstances, KKPS may exceed the permitted maximum hours (specified above) in the event that operation of a continuance of operation is required if

- a) the AEMO, or a person authorised by AEMO, directs the Proponent, under the National Electricity Law and the National Electricity Rules, to take relevant actions to maintain or restore the security or reliability of the electricity network;
- b) the relevant AEMO direction referred to above remains in force; and
- c) Snowy Hydro takes all practical measures to prevent or minimise air pollution

KKPS produces electricity via two heavy duty, open cycle, F-type Mitsubishi Heavy Industries (MHI) M701F5 turbines, with a combined nominal capacity of 660MW. The turbines operate utilising natural gas as the primary fuel, and diesel as a back up supply. The turbines are also capable of operating with up to 15% hydrogen blended into the natural gas flow.

Natural gas is supplied to KKPS via the Kurri Kurri Lateral Pipeline (KKLP), a gas transmission and storage pipeline, owned and operated by the APA Group, that branches from the main Sydney-Newcastle gas pipeline (see **Appendix B**). KKLP consists of a 21km medium pressure underground transmission pipeline, a compressor station, and a 24km high pressure looping gas storage pipeline, and delivery station. The KKLP provides up to 70 terajoules of gas storage for KKPS to enable continuous nominal generation on gas fuel for both units for up to 10 hours.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 19 of 84

Diesel is tankered to KKPS and stored onsite in fully bunded bulk diesel storage tanks. All diesel fuel used at KKPS is provided by reputable suppliers, and regularly tested to ensure quality and compliance with the *Australian Government's Fuel Quality Standards (Automotive Diesel) Determination 2019* made under the *Fuel Quality Standards Act 2000*.

2.5 Key Site Components and Features

The key components and structures of KKPS are summarised in **Table 2.2**, with a site layout of the provided in **Figure 2.5**.

Table 2.2: Key Elements of Kurri Kurri Power Station

Facility Element	Description/Summary
Gas Turbine Power Island	- Two heavy duty F-class Mitsubishi Heavy Industries M701F5 Open Cycle Gas Turbines, with a combined nominal capacity of 660MW. - Required turbine balance of plant infrastructure, generator circuit breakers and generator step-up transformers.
132kV Electrical Switchyard	- Circuit breakers, bus-bars, isolators, series reactor and switchyard equipment including overhead lines between the power station and the switchyard. - Direct switchyard connection to Ausgrid overhead 132 kV transmission lines.
Ancillary balance of plant infrastructure	- Internal site access roadways, and parking areas - Water storage tanks (potable, fire and demineralised), and associated infrastructure including pumps, demineralised water plant, and piping 1x 1,720kL Service (Potable) Water Tank 1x 1,720kL Demineralised Water Tank 2x 550kL Fire Water Tanks 2x 2,121kL Diesel fuel storage tanks, and associated infrastructure including pumps and piping - Diesel tanker unloading facilities - Other (non-fuel) truck loading/unloading facilities - Control room - Concrete bunded areas for diesel fuel tanks, liquid chemicals store, oil filled transformers and other facilities where such liquids could leak. - On site oily water system, with a 660kL pit, and inflow drainage from: - Diesel fuel unloading area - Diesel fuel storage tanks bund - Gas turbine diesel fuel skid - Gas turbine and generator lube oil area - Gas turbine wash drains - Generator step up transformer bund. - Trade wastewater system, including a 64kL storage pit, and inflow drainage from: - Turbine Air Cooler and Gas Heater - GT High Pressure Purge Air Receiver - Demineralised Water Pumps - Demineralised Water Brine Wastewater - Demineralised Water Tank Overflow and Drain Outlet - Evaporative Cooler Discharge - Hardstand areas including concrete foundations, bitumen roadways, concrete surfaces in liquid fuel unloading station and gas turbine unit maintenance areas

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	• Stormwater drainage system that includes pits, pipes, triple interceptor, and pumping infrastructure • Security fence, security lighting, stack aviation warning lights, and surveillance system • Office/administration buildings and amenities • Workshop, warehouse/storage areas • Communication systems • Occupational health and safety systems including an emergency warning and evacuation system • Firefighting system including water storage, pumps, hydrants, and deluge systems • Emergency diesel generator with associated internal fuel storage • Closed circuit cooling systems for small on-site heat exchangers • Local electrical switch/control rooms • Equipment laydown areas • Landscaped areas and staff parking
Offsite supporting infrastructure	• Public road network to access KKPS including Hart Road and Hunter Expressway • Fire trails, and APZ area adjacent to site for bushfire management • Waste and wastewater management facilities in the region • Auxiliary power supply network • Direct connection to existing Ausgrid overhead 132 kV transmission lines

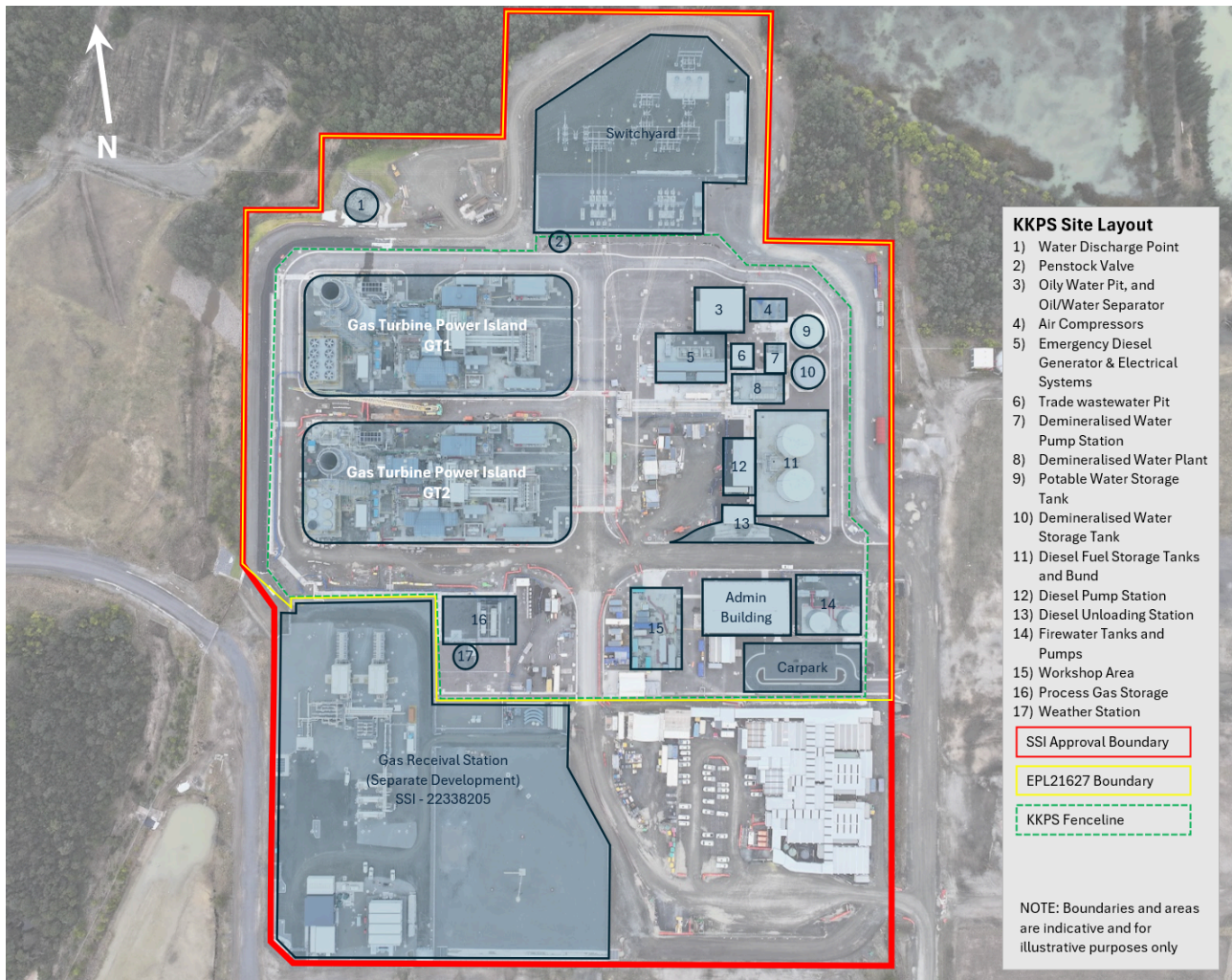


Figure 2.5: Kurri Kurri Power Station Site Layout

2.6 Environmental Policy

Snowy Hydro's Environmental Policy is reviewed and updated regularly and can be found in the Snowy Hydro document management system, intranet site (the Grid), and on the public Snowy Hydro website. The link to the public website is provided below.

<https://www.snowyhydro.com.au/about/corporate-governance/>

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Revision: 5.1

Snowy Hydro Limited - Kurri Kurri Power Station
Operational Environmental Management Plan

Page 23 of 84

3.0 Compliance Requirements

The primary legislative requirements considered by this OEMP have been determined under:

- The *Environmental Planning and Assessment Act 1979 (NSW)* (EP&A Act), and implemented through the SSI Approval
- The *Protection of the Environment Operations Act 1997 (NSW)* (POEO Act), and implemented through EPL21627
- The *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (EPBC Act), and implemented through the EPBC Approval

The OEMP also addresses the Summary of Mitigation Measures (chapter 22) contained within the KKPS Environmental Impact Statement (EIS) prepared by Jacobs (April 2021), and Submissions Report (Jacobs, August 2021). Of note, is that the majority of the obligations in these two documents relate to the construction phase of KKPS, or are addressed directly through conditions of EPL21627, the SSI Approval and/or EPBC Approval.

3.1 SSI Approval

The SSI Approval, and associated information including project details, modification history, post approval documentation and compliance history may be accessed online via DPHI's Major Projects Portal

[DPHI Major Projects Portal: Hunter Power Project \(Kurri Kurri Power Station\)](#)

In December 2020, KKPS was declared as a 'Critical State Significant Infrastructure Project' by order under Clause 12, Schedule 5 of State Environmental Planning Policy (State and Regional Development) 2011.

Following application as a critical state significant infrastructure project, and assessment by DPHI, the Minister for Planning and Public Spaces granted approval for KKPS on 17 December 2021, pursuant to Section 5.19 of the EP&A Act, and subject to the conditions detailed in the SSI Approval (SSI-12590060). The full requirements for applicable conditions, and where these conditions are addressed is set out in **Table 3.1**.

In accordance with Condition A4 of the SSI Approval, Snowy Hydro shall ensure that any reasonable requirements arising from the DPHI's assessment of the following are complied with:

- any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with the SSI Approval
- any reports, reviews or audits undertaken or commissioned by DPHI regarding compliance with the SSI Approval
- the implementation of any actions or measures contained in the documents specified in the above points

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 24 of 84

Table 3.1: Summary of SSI Approval Conditions

Condition	How/where addressed in OEMP framework
Part A: Administrative Conditions	
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	
A1. In addition to meeting the specific performance criteria established under this approval, the Proponent must implement all feasible and reasonable measures to prevent, and if prevention is not feasible and reasonable, minimise any material harm to the environment that may result from the construction, operation, decommissioning or rehabilitation required under this approval.	Section 5.0 & each Management plan
TERMS OF APPROVAL	
A2. The Proponent must carry out the development: a) generally in accordance with the EIS; b) in accordance with all written directions of the Secretary; and c) in accordance with the conditions of this approval. <i>Note: The general layout of the development is shown in Appendix 2.</i>	Section 1.1
A3. If there is any inconsistency between the documents in condition A2 above, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval prevail to the extent of any inconsistency.	Section 1.1
A4. The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this approval; b) any reports, reviews or audits undertaken or commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents	Section 3.1
A5. Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition C6.	Section 9.1
LAPSE OF APPROVAL	
A6. This approval will lapse five years after the date on which it is granted, unless construction has physically commenced on or before that time.	N/A
LIMITS ON APPROVAL	
A7. The development must be a dual fuel power station using natural gas and/or liquid fuel (diesel) and shall comprise of two open cycle gas turbine power plants with a total nominal output capacity of up to 750 megawatts.	Section 2.4
LIMITS ON OPERATIONS	
A8. Fuel burning equipment must not be operated for the purpose of generating electrical power at the premises for more than 1,100 cumulative hours per calendar year.	Section 2.4

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 25 of 84
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Condition	How/where addressed in OEMP framework
A9. Fuel burning equipment must not be fired on diesel for the purpose of generating electrical power at the premises for more than 175 cumulative hours per calendar year.	Section 2.4
A10. Diesel fuel used in the power station must comply with the <i>Australian Government's Fuel Quality Standards (Automotive Diesel) Determination 2019</i> made under the <i>Fuel Quality Standards Act 2000</i> .	Section 2.4
A11. The Proponent is permitted to exceed the maximum hours specified in A8 and A9 in the event that operation, or continued operation, is required if: (a) the AEMO, or a person authorised by AEMO, directs the Proponent, under the National Electricity Law and the National Electricity Rules, to take relevant actions to maintain or restore the security or reliability of the electricity network; (b) the relevant AEMO direction referred to above remains in force; and (c) the Proponent takes all practical measures to prevent or minimise air pollution.	Section 2.4
A12. The Proponent must notify the Secretary and the EPA of any and all limit exceedances of conditions A8 to A10 or activation of condition A11.	Table 4.2 (Section 4.3.3)
STATUTORY REQUIREMENTS	
A13. The Proponent must ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the development. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent must ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the life of the development.	Section 3.0
A14. The relevant provisions of section 188 of the EP&A Regulation apply to this approval.	Section 3.0
NOTIFICATION	
A15. At least two weeks prior to the commencement of the following activities, unless otherwise agreed by the Secretary, the Proponent must notify the Department in writing of: a) the date of commencement of: construction of the development; b) commissioning of the gas power station; c) operations; and d) the decommissioning of the development and rehabilitation of the site.	Table 4.2 (Section 4.3.3)
STRUCTURAL ADEQUACY	
A16. The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	N/A for KKPS operations
DEMOLITION	
A17. The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	N/A for KKPS operations

Condition	How/where addressed in OEMP framework
PROTECTION OF PUBLIC INFRASTRUCTURE	
A18. Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	N/A for KKPS operations
OPERATION OF PLANT AND EQUIPMENT	
A19. The Proponent must ensure that all plant and equipment used on site, or in connection with the development, is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Section 1.1
ENVIRONMENTAL REPRESENTATIVE	
A20. Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Section 4.2.1
A21. The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Section 4.2.1
A22. The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2, and is independent from the design and construction of the development. The ER must meet only the requirements set out in sections 2.2, 2.3, 2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Section 4.2.1
A23. From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions B5, B8, B12, B13, B19, B29, B33, B40, B43, B48 and C1 and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department); CONSOLIDATED APPROVAL NSW Government 7 Department of Planning and Environment b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and c) consider any minor amendments to be made to the plans / strategies in conditions B5, B8, B12, B13, B19, B29, B33, B40, B43, B48 and C1 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.	Section 4.2.1

Condition	How/where addressed in OEMP framework
A24. The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A23, as well as the complaints register for any complaints received (on the day they are received)	Section 4.2.1
PLANNING AGREEMENT	
A25. Within 6 months of the date of commencement of development under this approval, or other timeframe agreed by the Secretary, the Proponent must enter into a Planning Agreement with Council: a) in accordance with Division 7.1 of Part 7 of the EP&A Act; and b) the terms of the Proponent's offer to Council in Appendix 3.	N/A for KKPS operations
A26. If the Proponent and Council do not enter into a Planning Agreement within the timeframe under condition A25, then prior to the commencement of operation of the development, the Proponent must make a Section 7.12 of the EP&A Act contribution to Council of \$880,000. The amount to be indexed in accordance with the provisions of the Council's <i>City Wide Infrastructure Contributions Plan 2020</i> .	N/A for KKPS operations
A27. If there is any dispute between the Proponent and Council in regards to conditions A25 and A26 then either party may refer the matter to the Secretary for resolution.	N/A for KKPS operations
TEMPORARY ADDITIONAL CONSTRUCTION AREA	
A28. Prior to the operation of the development, unless otherwise agreed by the Secretary, the Proponent may utilise the temporary additional construction area identified as Precinct 3B in Figure 2 of Appendix 2 of this approval for construction activities.	N/A for KKPS operations
TEMPORARY WORKFORCE ACCOMMODATION FACILITY	
A29. The Proponent may utilise the temporary additional area identified as Temporary Workforce Accommodation Facility in Figure 3 of Appendix 2 of this approval during construction only.	N/A for KKPS operations
PART B ENVIRONMENTAL CONDITIONS – GENERAL	
AIR QUALITY	
B1 to B11	Air Quality MP
HAZARDS AND RISKS	
B12 to B14	N/A for KKPS operations
Post-startup B15. Three months after the commencement of operation of the development, the Proponent must submit to the Secretary, a <u>Post-Startup Compliance Report</u> verifying that: a) the Emergency Plan required under condition B13(a) is effectively in place and that at least one emergency exercise has been conducted; and b) the Safety Management System required under condition B13(b) has been fully implemented and that records required by the system are being kept.	Table 4.2 (Section 4.3.3)

Condition	How/where addressed in OEMP framework
Post commissioning requirements B16. Twelve months after the commencement of operations of the development and every three years thereafter or at such intervals as the Secretary may agree, the Proponent must carry out a comprehensive Hazard Audit of the development and within two months of each audit submit a report to the satisfaction of the Secretary for approval. The audits must be carried out at the Proponent's expense by a qualified person or team, independent of the development and approved by the Secretary prior to commencement of the audit. Hazard Audits must be carried out in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit'</i> . The audit must include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented.	Table 4.2 (Section 4.3.3), Section 7.3.2
General B17. The Proponent must store and handle all chemicals, fuels and oils in accordance with: a) the requirements of all relevant Australian Standards; b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; and c) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. In the event of an inconsistency between the requirements in (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.	Section 5.8
B18. For the purpose of condition B17, any tanks or other storage vessels that are interconnected and may distribute their contents either by gravity or automated pumps must be considered a single vessel.	Section 5.8
TEMPORARY WORKFORCE ACCOMMODATION FACILITY	
B18A to B18C	N/A for KKPS operations
AVIATION SAFETY	
B19 to B20	N/A for KKPS operations
NOISE	
B21 to B29	Noise MP
B30 to B32	N/A for KKPS operations
BIODIVERSITY	
B33 to B34	Biodiversity MP

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 29 of 84
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Condition	How/where addressed in OEMP framework
WATER AND SOIL	
B35 to B40	Water MP
HERITAGE	
B41 to B43	Cultural Heritage MP
WASTE	
B44 to B45	Waste MP
CONTAMINATION	
B46	N/A for KKPS operations
TRAFFIC AND TRANSPORT	
B47 to B48	Traffic MP
VISUAL AND LIGHTING	
B49. The Proponent must: a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; b) ensure the visual appearance of infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and c) not mount any commercial advertising signs or logos on site, except where this is required for identification or safety purposes	Section 5.11
B50. The Proponent must: a) minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development: i) is installed as low intensity lighting (except where required for safety or emergency purposes); ii) does not shine above the horizontal; and iii) complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version	Section 5.11
PART C ENVIRONMENTAL MANAGEMENT AND REPORTING	
ENVIRONMENTAL MANAGEMENT	
Environmental Management Strategy	This OEMP
C1. Prior to commencing construction, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	
a) provide the strategic framework for environmental management of the development;	Section 1.2

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Condition	How/where addressed in OEMP framework
b) identify the statutory approvals that apply to the development;	Section 3.0
c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 4.2, Table 4.1
d) describe the procedures that would be implemented to: i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; ii) receive, handle, respond to, and record complaints; iii) resolve any disputes that may arise; iv) respond to any non-compliance; v) respond to emergencies; and	Section 6.0 Section 6.1 Section 6.2 Section 6.2.1 Section 4.3 Section 5.12, 5.2.1
e) include: i) the following subplans: • construction air quality management plan prepared in consultation with the EPA; • construction noise management plan prepared in consultation with the EPA; and • construction and operational waste management plan, incorporating management of any contaminated materials disturbed during construction ii) references to any strategies, plans and programs approved under the conditions of this approval; and iii) a clear plan depicting monitoring to be carried out under the conditions of this approval.	Air Quality MP, Section 5.1 Noise MP, Section 5.3 Waste MP, Section 5.6 Table 3.1, Section 5.0 Section 7.4
The Proponent must implement the approved Environmental Management Strategy	This OEMP, Section 1.1

Condition	How/where addressed in OEMP framework
Net Zero Power Generation Plan C2. Prior to the commencement of operations, the Proponent must prepare a Net Zero Power Generation Plan for the development, to the satisfaction of the Secretary. The plan must: a) be prepared by a suitably qualified, experienced and independent person approved by the Secretary; b) be prepared in consultation with the EPA and the Department's Climate and Atmospheric Science Group; c) investigate opportunities to achieve Net Zero greenhouse gas emissions from the development including consideration of: i) contemporary best practice and continuous improvement measures; ii) applicable Commonwealth and State greenhouse gas emissions targets and policies including a commitment to Net Zero by 2050, and 50% reduction compared to 2005 levels by 2030; iii) latest technology for displacing natural gas or diesel as the fuel supply, such as use of green hydrogen; d) describe measures to displace or offset greenhouse gas emissions having regard to: i) the investigations undertaken under condition C2(c); and ii) the following Net Zero targets by calendar year: • from the commencement of operations until 2029: 10% of total Scope 1 greenhouse gas emissions; • from 2030 until 2039: all Scope 1 greenhouse gas emissions resulting from generating electrical power at the premises for more than 175 cumulative hours per calendar year (or 2% of the year); and • from 2040 onwards: all Scope 1 greenhouse gas emissions.	Section 5.13, Net Zero Power Generation Plan
C3. Every three years following the approval of the plan, or other timeframe agreed by the Secretary, a report shall be submitted to the Secretary to update the outcomes of the investigations and measures described in condition C2	Section 5.13, Net Zero Power Generation Plan
C4. The Proponent must implement the approved Net Zero Power Generation Plan	Section 5.13, Net Zero Power Generation Plan
Revision of Strategies, Plans and Programs C5. Within 3 months, unless the Secretary agrees otherwise, of: a) the submission of an incident report under condition C6 below; b) the submission of an audit report under conditions C15 to C19 below; and c) the approval of any modification to the conditions of this approval; or d) a direction of the Secretary under condition A2 of Schedule 2;	Section 9.0
the Proponent must review and, if necessary, revise the studies, strategies or plans required under the conditions of approval to the satisfaction of the Secretary.	Section 9.0
Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary. <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i>	Section 9.0

Condition	How/where addressed in OEMP framework
COMPLIANCE	
Incident Notification, Reporting and Response C6. The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident.	Section 4.3.2, Table 4.2
Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	Section 4.3.2, Table 4.2
Non-Compliance Notification C7. The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.	Section 4.3.2a, Table 4.2
C8. A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 4.3.2a, Table 4.2
C9. A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Section 4.3.2a, Table 4.2
Compliance Reporting C10. Compliance Reports of the development must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020) or its latest version.	Section 4.3.2b
C11. Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020) or its latest version, unless otherwise agreed to by the Secretary.	Section 4.3.2b, Table 4.2
C12. The Proponent must make each Compliance Report publicly available within 60 days of submitting it to the Secretary, unless otherwise agreed by the Secretary.	Section 4.3.2b, Section 6.1
C13. Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020) or its latest version, the Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	Section 4.3.2b
NOTIFICATIONS	
Notification of Department C14. Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Proponent must notify the Department via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	4.3.3, Table 4.2

Condition	How/where addressed in OEMP framework
INDEPENDENT ENVIRONMENTAL AUDIT	
C15. Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) or its latest version.	Section 7.3.1
C16. Proposed independent auditors must be agreed to in writing by the Secretary prior to the commencement of an Independent Audit.	Section 7.3.1
C17. The Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (2020) or its latest version, upon giving at least 4 weeks' notice (or timing) to the Proponent of the date upon which the audit must be commenced.	Section 7.3.1
C18. Audit Reports and the Proponent's response to audit findings must be submitted to the Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) or its latest version, unless otherwise agreed by the Secretary.	Section 4.3.3, Table 4.2 Section 7.3.1
C19. Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020) or its latest version, the Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Secretary's satisfaction that independent operational audits have demonstrated operational compliance	Section 7.3.1
ACCESS TO INFORMATION	
C20. Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website: i) the EIS; ii) all current statutory approvals for the development; iii) all approved strategies, plans and programs required under the conditions of this approval; iv) the proposed staging plans for the development of the construction, operation or decommissioning of the development is to be staged; v) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this approval; vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; vii) a summary of the current phase and progress of the development; viii) contact details to enquire about the development or to make a complaint; ix) a complaints register, updated monthly; x) the Annual Reviews of the development; xi) audit reports prepared as part of any Independent Environmental Audit of the development and the Proponent's response to the recommendations in any audit report; xii) any other matter required by the Secretary; and b) keep such information up to date, to the satisfaction of the Secretary.	Section 6.1

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 34 of 84
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Condition	How/where addressed in OEMP framework
UPDATING AND STAGING OF STUDIES, STRATEGIES AND PLANS	
C21. To ensure the studies, strategies and plans for the development are updated on a regular basis and incorporate any required measures to improve the environmental performance of the development, the Proponent may submit revised studies, strategies or plans required for the development under the conditions of approval at any time. With the agreement of the Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis.	Section 9.0
C22. The Secretary may approve a revised strategy or plan required under the conditions of approval, or the stage submission of these documents, at any time. With the approval of the Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable conditions in this approval. Notes: • While any study, strategy or plan may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable studies, strategies or plans at all times. • If the submission of any study, strategy or plan is to be staged, then the relevant study, strategy or plan must clearly describe the specific stage to which the study, strategy or plan applies, the relationship of this stage to any future stages, and the trigger for updating the study, strategy or plan.	Section 9.0
APPENDIX 4: INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS	
WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	
1. A written incident notification addressing the requirements set out below must be submitted to the Secretary via the Major Projects website within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under condition C6 or, having given such notification, subsequently forms the view that an incident has not occurred.	Section 4.3, Table 4.2
2. Written notification of an incident must: - identify the development and application number; - provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); - identify how the incident was detected; - identify when the Proponent became aware of the incident; - identify any actual or potential non-compliance with conditions of approval; - describe what immediate steps were taken in relation to the incident; - identify further action(s) that will be taken in relation to the incident; and - identify a development contact for further communication regarding the incident.	Section 4.3, Table 4.2
3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Secretary, the Proponent must provide the Secretary and any relevant public authorities (as determined by the Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	Section 4.3, Table 4.2

Condition	How/where addressed in OEMP framework
4. The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident.	Section 4.3, Table 4.2

3.2 SSI Approval Modifications

Following application, and subsequent approval from DPHI, the conditions of the SSI Approval may be modified. Should a modification be required, the application shall be developed in consultation with the Senior Environmental Advisor, who will coordinate the preparation of the application, and any supporting environmental assessment/s that may be required. It is important to note that several conditions of the SSI Approval are consistent with conditions of EPL21627, or have the same practical intent. Therefore any proposed modification of the SSI Approval must consider whether a modification to EPL21627 will also be required to ensure consistency and alignment between the two instruments. Furthermore, under the EPBC Approval, any modification to the SSI Approval that relates to the environment requires notification to DCCEEW following submission to DPHI, and again following the modification being finalised.

The SSI Approval, and a history of modifications to the approval can be found on the NSW Major Projects Portal:

[Major Projects Portal: Hunter Power Station \(Kurri Kurri Power Station\)](#)

3.3 Environment Protection Licence

The Environment Protection Licence for KKPS, EPL21627, and a full history of licence applications, notice and Annual Return summaries may be accessed via the NSW EPA's POEO Public Register:

[POEO Public Register: EPL21627 Hunter Power Station](#)

Under the provisions of the POEO Act, EPL21627 permits KKPS to undertake the Scheduled Activity of 'Electricity generation'. It also indicates the fee based activity for KKPS as 'generation of electrical power from gas', that is the activity that determines licencing fees for each scheduled activity as per Schedule 1 of the *Protection of the Environment (General) Regulation 2009*

As required, Snowy Hydro may apply to vary the conditions of EPL21627 in a similar way to the SSI Approval. It is important to note that several conditions of EPL21627 are consistent with conditions of the SSI Approval, or have the same practical intent. Therefore any proposed modification of EPL21627 must consider whether a modification to the SSI Approval will also be required to ensure consistency and alignment between the two instruments.

A summary of the conditions of EPL21627 are set out in **Table 3.2**.

Table 3.2: Summary of Environment Protection Licence 21627 Conditions

Section	Condition/s	Condition Summary	How/where addressed in OEMP framework
1 Administrative Conditions	A1-A4	- What the licence authorises and regulates - Premises or plant to which this licence applies - Other activities - Information supplied to the EPA	Section 2.0
2 Discharges to Air and Water and Applications to Land	P1	Location of monitoring/discharge points and areas to air and water	Air Quality MP, Noise MP, Water MP
3 Limit Conditions	L1-L7	- Pollution of waters - Load limits - Concentration limits for emissions to air - Noise limits - Hours of operation (construction activities) - Potentially offensive odour - Other limit conditions - Fuel requirements and limitations on hours of operation	This Plan and various subplans

Section	Condition/s	Condition Summary	How/where addressed in OEMP framework
4 Operating Conditions	O1-O6	- Activities must be carried out in a competent manner - Maintenance of plant and equipment - Dust - Emergency response - Waste management - Other operating conditions - Chemical storage - Sulfur content in diesel - Erosion and sediment control	This Plan and various subplans
5 Monitoring and Recording Conditions	M1-M8	- Monitoring records - Requirement to monitor concentration of pollutants discharged (air and water discharges) - Testing methods - concentration limits - Testing methods - load limits - Weather monitoring - Recording of pollution complaints - Telephone complaints line - Noise monitoring	Section 5.0, Section 8.2
6 Reporting Conditions	R1-R4	- Annual return documents - Notification of environmental harm - Written report - Other reporting conditions - Noise monitoring report - Air concentration limit exceedances	Section 4.3
7 General Conditions	G1	Copy of licence kept at the premises or plant	Section 3.3
8 Special Conditions	E1-E2	- Air quality verification - Planned Commissioning Work	Air Quality MP

3.4 EPBC Approval

The EPBC Approval for KKPS, a summary of the EPBC Referral, and associated decision notices may be accessed via the EPBC Public Portal:

[EPBC Public Portal: Kurri Kurri Gas Fired Power Station - EPBC No. 2021/8888](#)

In February 2021, an EPBC Act referral was submitted for KKPS. Following review of and consideration of the referral and assessment of significance, it was determined under Section 75 of the EPBC Act that KKPS would require assessment and approval under the EPBC Act before it could proceed. This decision was based on KKPS being a controlled action as per section 28 of the EPBC Act.

Following review, the Federal Minister for the Environment granted approval for KKPS on 6th February 2022, under the provisions of Section 130 and 133 of the EPBC Act, and subject to the conditions detailed in the EPBC Approval (EPBC 2021/8888). A summary of these conditions are set out in **Table 3.3**.

Table 3.3: Summary of EPBC Approval Conditions

Section	Condition/s	Condition Summary	How/where addressed in OEMP framework
Part A: Conditions Specific to the Action	1	Compliance with conditions A8-A12, B1-B11, B19-B20, B35-B40, B41-B43, B46, C1-C4 of the SSI Approval	Section 3.1
	2	Actions to occur within the specified site boundary (Attachment A)	Section 2.0
Part B: Standard Administrative Conditions	3-4	Notification of the date of commencement of the action	Section 4.3
	5-6	Compliance records	Section 8.0
	7	Annual compliance reporting	Section 4.3
	8-9	Reporting non-compliance	Section 4.3
	10-12	Independent Audit	Section 7.3
	13	Completion of the Action	Section 4.3
	14-15	Changes to State Development Consent	Section 4.3
Part C: Definitions	N/A	Definitions of terms used in the EPBC Approval	N/A
Attachments	Attachment A	Map of the proposed action area and boundary	N/A

3.5 Related Projects

Although a separate development to KKPS, the Kurri Kurri Lateral Pipeline project developed by the APA Group is critical for the operation of KKPS. KKLP was developed to supply natural gas from the existing Sydney-Newcastle transmission network at Lenaghan to KKPS.

The KKLP consists of a 21 km medium pressure underground gas transmission pipeline with operating capacity of up to 60 terajoules (TJ) per day, a buried looping high pressure gas storage pipeline around 24.4 km in length, a buried steel interconnector pipeline around 1.3 km and supporting infrastructure, including an offtake facility, delivery station and compressor station. The storage pipeline provides up to 70 TJ of gas storage to supply KKPS at maximum load for up to 10 hours

An aerial plan of the KKLP is contained in **Appendix B**, with further details of the KKLP accessible online via DPHI's Major Projects Portal

[DPHI Major Projects Portal: Kurri Kurri Lateral Pipeline Project](#)

3.6 Legislative Requirements

A summary of legislative requirements relevant to KKPS was determined as part of the KKPS Environmental Impact Statement. An overview of the relevant applicable legislative requirements for KKPS is provided in **Table 3.3**.

Table 3.3: Summary of Legislative Requirements for the Kurri Kurri Power Station

Legislation	Responsible Agency	Relevant Provisions	Approval/Licence Requirements
Commonwealth Requirements			
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Department of Climate Change, Energy, the Environment and Water (DCCEEW)	The EPBC Act provides a legal framework to protect and manage nationally important flora, fauna, ecological communities and heritage places defined as Matters of National Environmental Significance (MNES)	Satisfy the requirements of the EPBC Approval granted by the Federal Environment Minister on 6th February 2022
National Greenhouse and Energy Reporting Act 2007	Clean Energy Regulator	Corporations that meet an National Greenhouse Energy Reporting (NGER) threshold must report their: • Greenhouse gas emissions • Energy production and consumption, and • Other information specified under NGER legislation.	Annual NGER reporting required. Snowy Hydro is required to submit annual NGER reports for all facilities. Scope 1 & 2 emissions will be quantified for KKPS in accordance with the NGER (Measurement) Determination 2008.

Legislation	Responsible Agency	Relevant Provisions	Approval/Licence Requirements
State Requirements			
<i>Environmental Planning and Assessment Act 1979 and Environmental Planning and Assessment Regulation 2021</i>	Department of Planning, Housing and Infrastructure (DPHI)	The EP&A Act and Regulation provides the framework for environmental planning in NSW and includes provisions and processes to ensure that proposals which have the potential to impact the environment are subject to detailed assessment.	Satisfy the requirements of the SSI Approval granted by the NSW Minister for Planning and Public Spaces on 17 December 2021, and any subsequent modifications to the approval
<i>Protection of the Environment Operations Act 1997</i>	NSW Environment Protection Authority (NSW EPA)	The POEO Act is the principal legislation regulating pollution and waste management in NSW. All activities listed under schedule 1 require an Environment Protection Licence (EPL) to undertake those activities	Satisfy the requirements of EPL21627. KKPS meets the criteria for both 'general electricity works and 'metropolitan electricity works (gas turbines)', defined under the scheduled activity of 'Electricity Generation'
<i>Protection of the Environment Operations (Clean Air) Regulation 2022</i>	NSW EPA	Provisions for air emissions limits for various parameters including those specified in the SSI Approval and EPL21627	Mitigation measures to address impacts to air quality are included in the Air Quality Management Plan
<i>Protection of the Environment Operations (General) Regulation 2022</i>	NSW EPA	If a facility exceeds the thresholds for a listed National Pollutant Inventory (NPI) substance then the facility must report emissions of that substance to the NPI team within NSW EPA.	Annual NPI reporting. Substances reported are dependent upon meeting the specified thresholds across three categories. KKPS is likely to exceed the threshold for Cat 2a and 2B, therefore will be required to submit an annual NPI report.
<i>Biodiversity Conservation Act 2016</i>	NSW EPA & DPHI	Part 7 of the BC Act requires an application for CSSI approval under the EP&A Act is accompanied by a Biodiversity Development Assessment Report (BDAR).	A BDAR was prepared as part of the EIS process that determined potential biodiversity values that were impacted, and subsequently addressed during construction. Ongoing measures address potential impacts during operations are included in the Biodiversity Management Plan
<i>Electricity Supply Act 1995</i>	NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) Australian Energy Market Operator (AEMO)	The Electricity Supply Act regulates network operations and electricity supply to establish a competitive retail market in electricity so as to promote efficient and environmentally responsible production. The Act confers powers to network operators to enable	A licence to supply electricity is required under the National Electricity Rules (NER). KKPS is registered as a Generator of Electricity under the NER effective from 25 March 2025.

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Legislation	Responsible Agency	Relevant Provisions	Approval/Licence Requirements
		them to construct, operate, repair and maintain their electricity works.	
<i>Pipelines Act 1967, and Pipeline Regulation 2023</i>	NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW)	This Act regulates pipeline construction, operation and maintenance of pipelines.	A licence to construct and operate the Kurri Kurri Lateral Pipeline, which supplies KKPS with natural gas, is required. Licence No. 45 was granted to APA Group by the NSW Government in September 2023.
<i>State Environmental Planning Policy No. 33 - Hazardous and Offensive Development (SEPP 33)</i>		Specifies a requirement to assess the hazards and risks associated with a proposed development before approval is given for construction and operations.	A Preliminary Hazard Analysis (PHA) was prepared as part of the EIS, with ongoing Site Hazard Audits to be completed as per the requirements of the SSI Approval.
<i>State Environmental Planning Policy (Koala Habitat Protection) 2019</i>		The Koala Habitat SEPP applies to all local government areas in Schedule 1, which includes the City of Cessnock.	A biodiversity study was conducted and included in the biodiversity impact assessment as part of the EIS. No further impact to Koala habitat is expected during KKPS operations
<i>State Environmental Planning Policy No. 55 – Remediation of Land</i>		SEPP 55 provides an approach to the remediation of contaminated land, to reduce the risk of harm to human health and the environment.	Recommendations and mitigations measures to minimise and/or eliminate hazards will be considered as required throughout KKPS operations.

3.7 Tracking Compliance

A compliance register has been developed for the operational period of the project, and is maintained in the Snowy Hydro Event Management System (Enablon). Within the CGS, management system accountabilities are allocated for monitoring and implementing compliance obligations.

Compliance obligations including statutory reporting, and monitoring obligations are included in the Snowy Hydro Planning & Scheduling System, Ellipse. The system is used to assign and track required activities at a site level, and includes environmental compliance related activities such as scheduled site inspections, maintenance of monitoring equipment, and annual stack emissions testing.

Changes in operations, including changes to assets and their configuration, are recorded in the Snowy Hydro Corporate Asset Change Management System (JIRA). The system provides daily email notifications to the Environment Team so that changes with potential environmental or compliance implications can be addressed.

Where non-compliances with statutory requirements are identified, these are recorded as incidents in Enablon, and tracked in that manner. Each incident is investigated as appropriate, with corrective actions identified, assigned, and implementation of actions monitored through to completion.

Specific aspects of the program used to provide oversight for compliance include:

- Compliance registers have been prepared and are maintained by SHL. These are regularly reviewed by external consultants for NSW gas-fired power station legislative requirements.
- Snowy Hydro's compliance management system as a record of identified compliance obligations.
- Notification of and regular review of legislative updates that may affect compliance obligations.
- External auditing, including independent environmental auditing as set out in the SSI and EPBC Approvals, and annual audits of Snowy Hydro's ISO14001 certified Environmental Management System.
- Internal environmental audits of management plans and application of environmental management controls
- Monthly review and publication of environmental monitoring data; and
- Regular review and where required, updates of this OEMP, and associated sub-plans.

Environmental compliance at KKPS is demonstrated in an Annual Compliance Report, submitted to DPHI and Federal DECCWW addressing compliance reporting obligations in the SSI and EPBC Approvals. Compliance under EPL21627 is demonstrated via the submission of an Annual Return to the NSW EPA.

Within Snowy Hydro, compliance is reported monthly to the operations executive committee and then to the Snowy Hydro Board. The reports to the operations executive include any identified non-compliances with the conditions of the SSI Approval, EPBC Approval, EPL21627, or any other applicable compliance obligation.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 43 of 84

4.0 Environmental Governance

4.1 Aspects, Impacts and Risk

An Aspects and Impacts Register is maintained for environmental aspects associated with gas and diesel operations at Snowy Hydro. KKPS has been incorporated into the register which is maintained in the Snowy Hydro document management system (AODocs).

The Aspects and Impacts Register contains information regarding environmental aspects and their actual and potential impacts on the environment, operational controls which mitigate the potential impacts, a risk rating for each aspect, identification of significant environmental aspects based on risk ratings.

The Register is reviewed annually as well as following any significant change in management or maintenance that might create a new aspect or change a current risk rating. A review is also undertaken in response to a major non-conformance or complaint which identifies a new aspect or risk.

4.2 Environmental Management Responsibilities

During normal operating hours, KKPS is staffed by a Plant Manager, Planning Officer, and a team of Production Technicians. The Plant Manager holds overall responsibility for the management and safe operation of KKPS.

Operationally, KKPS is controlled remotely by the Generation Operations (Gen Ops) team based in Cooma, who also provide 24/7 monitoring of critical site alarms and conditions. Normal generation start and stop control is provided by Gen Ops at all times, and they also facilitate the necessary interaction between other network controllers, such as AEMO and Transgrid.

Local support for KKPS is provided at all times, with the KKPS Production Technicians available on a rostered on-call basis.

Environmental, Safety, Production and Engineering support is provided by the relevant Snowy Hydro teams based locally or Cooma as required.

The organisation chart for the Northern Gas & Diesels Team, which includes KKPS is set out in **Figure 4.1**, with roles and responsibilities for environmental management summarised in **Table 4.1**.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 44 of 84

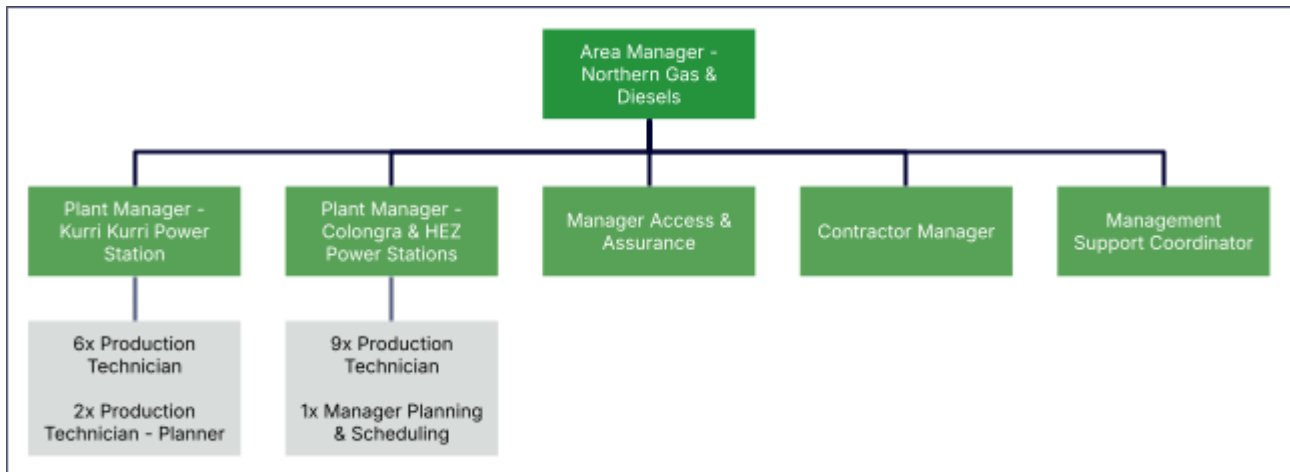


Figure 4.1: Organisation structure for Northern Gas & Diesels, including Kurri Kurri Power Station

Table 4.1: Summary of Kurri Kurri Power Station Environmental Responsibilities

Role	Summary of Responsibilities
KKPS Plant Manager	- Overall responsibility for the environmental performance of the Kurri Kurri Power Station, including compliance with environmental regulatory requirements. - Overall responsibility for the application and implementation of the requirements of the KKPS OEMP and associated subplans. - Ensure environmental aspects and impacts are understood, associated risks are managed, and that adequate operational/management procedures have been developed and implemented. - Ensuring appropriate levels of human, physical and financial resources are provided for effective environmental management at KKPS. - Ensuring KKPS personnel and contractors are aware of their environmental obligations, and receive appropriate training. - Ensure all incidents (environmental, safety and quality) are reported and investigated, operational controls are amended as required, and communicate with regulatory agencies as required. - Proactively communicate environmental issues within Snowy Hydro.
KKPS Operator In Charge	- Operate the gas turbine generators within the environmental limits and shut down the units if the environmental limits cannot, or are unlikely to be achieved. - Ensure all incidents (environmental, safety and quality) are reported and investigated, operational controls are amended as required, and communicate with regulatory agencies if necessary. - Proactively communicate environmental issues within Snowy Hydro.

Role	Summary of Responsibilities
Generation Operations Controller	• Operate the gas turbine generators within the environmental limits and shut down the units if the environmental limits cannot, or are unlikely to be achieved. • Ensure all incidents (environmental, safety and quality) are reported and investigated, operational controls are amended as required, and provide necessary advice/information to assist communications with regulatory agencies. • Proactively communicate environmental issues within Snowy Hydro.
KKPS Production Technicians	• Ensure they are familiar with the requirements of this OEMP and sub-plans. • Ensure they are familiar with the environmental compliance obligations relevant to KKPS, including awareness and implementation of the management and mitigation measures detailed in the KKPS OEMP and associated subplans. • Provide advice and assist with reviews of environmental aspects and risks, and the effective implementation of operational and management procedures. • Ensure all plant and equipment documentation, maintenance routines and maintenance records are adhered to and/or carried out. • Organising and maintaining materials transfer (e.g. waste, chemicals, bulk materials etc) to, from and around site. • Inspect and maintain plant and equipment in accordance with all relevant manuals, schedules, procedures and/or instructions, which also includes the effective operation/implementation of environmental controls. • Oversee the operation and maintenance of the Continuous Emission Monitoring System (CEMS), and provide reports from the system as required. • Responding to any environmental emergency and initiating action to limit or rectify any environmental impacts, including actions set out in the Kurri Kurri Power Station Emergency Response Handbook. • Report and investigate environmental incidents and complaints, and participate in investigations as required. • Notify the Senior Environmental Advisor, or delegate, and KKPS Plant Manager of any suspected environmental incident or hazard, and non-compliance or non-conformance.

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Role	Summary of Responsibilities
Senior Environmental Advisor	- Review and update the KKPS OEMP and sub-plans - Ensure environmental regulatory requirements, including monitoring, maintenance and recording requirements, are complied with and necessary reports and documents are prepared and submitted. - Initiate and facilitate reviews of environmental aspects and risks, and development of operational and management procedures. - Identifying, maintaining and communicating changes in regulatory requirements, and tracking compliance with those obligations. - Communicating the results of environmental audits, investigations, and incidents. - Initiate and facilitate internal environmental reporting and external communication with regulatory agencies. - Development, scheduling and presentation of environmental training and awareness. - Attend meetings and presentations with environmental regulators and community stakeholders. - Scheduling and participating in audits. - Provide advice on incident reporting, management, lead investigations, and provide assurance of preventative and corrective actions.

4.2.1 Environmental Representative

An independent Environmental Representative (ER) was appointed by Snowy Hydro and approved by the DPHI Secretary prior to commencing the development of KKPS.

The ER and their alternates are suitably qualified and experienced people who were not involved in the preparation of the EIS and associated submission documents, and is independent from the design and construction of the development. The ER must meet only the requirements set out in Sections 2.2, 2.3, 2.4 and 3 in the *Environmental Representative Protocol* (Department of Planning and Environment, October 2018).

Snowy Hydro has provided the ER with all documentation requested by the ER in order for them to perform their functions as specified in Condition of Approval A23 until the commencement of operations, or as agreed with the DPHI Secretary.

Environmental Representative Endorsement

From commencing the KKPS development, until the commencement of KKPS operations, or as agreed with the DPHI Secretary, the approved ER must review the documents identified in the SSI Approval condition assigned to the Environmental Representative. These are primarily the Environmental Management Strategy (this OEMP) and associated Management Plans, and other environmental assessments and verifications. The purpose of the reviews is to ensure the documents are consistent with approval requirements.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 47 of 84

The ER will make written statements as required to the Department, assist in community complaints, and have the authority to approve 'minor amendments' to Environment Management Plans and this OEMP.

The ER endorsement of the current version of the Environmental Management Strategy (OEMP) is attached in **Appendix C**.

Specific Document Reviews

As this version of the Environmental Management Strategy (OEMP) has been updated for KKPS operations, the ER has reviewed the plans listed below prior to the commencement of operations:

- Biodiversity Management Plan (Condition B33)
- Water Management Plan (Condition B40)
- Cultural Heritage Management Plan (Condition B43)
- Traffic Management Plan (Condition B48)
- Environmental Management Strategy (Condition C1)
- Air Quality Management Plan (Condition C1(e)(i))
- Noise Management Plan, (Condition C1(e)(i))
- Waste Management Plan (Condition C1(e)(i))

The ER will make a written statement to the Department after review of the documents identified above, with the review to be undertaken before implementation of the documents. The timing of the review will be as clarified with the Department as provided for in condition A23(a). As requested by the Department, the specifics of condition A23(a) are included, the condition reads;

"From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must:

- a) review the documents identified in conditions B5, B8, B12, B13, B19, B29, B33, B40, B43, B48 and C1 and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so:

 - i) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or*
 - ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department);**
- b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and*
- c) consider any minor amendments to be made to the plans / strategies in conditions B5, B8, B12, B13, B19, B29, B33, B40, B43, B48 and C1 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval."*

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 48 of 84

4.3 Reporting and Notification Requirements

4.3.1 Environmental Incidents - Internal Reporting

Environmental incidents at KKPS are managed in accordance with Snowy Hydro's QP14-07 Incident Management Procedure, and classified in accordance with the Safety and Environment Incident Classification Matrix, which uses four categories to define the level of an incident's consequence. Incident management procedures are accessible on the Snowy Hydro Intranet, which provide guidance on internal notification and investigation requirements.

Any environmental incident or near hit, including non-compliances and community complaints, should be reported in the event management system and communicated with the Environment Team.

4.3.2 Environmental Incidents - External Reporting

The response to a pollution incident causing or threatening material harm to the environment is detailed in the KKPS Emergency Response Handbook (ERH). The ERH serves as the KKPS Pollution Incident Response Management Plan (PIRMP), which is a document required by all holders of an Environment Protection Licence (EPL) under Part 5.7A of the POEO Act. A publicly available version of the PIRMP (internet based version) is also available on the Snowy Hydro website.

For major pollution incidents that are presenting an immediate threat to human health or property, 000 will be contacted in the first instance. As first responders, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are responsible for controlling and containing incidents.

If determined that a pollution incident has or is causing or threatening material harm to the environment, and immediate emergency assistance is not required, Snowy Hydro is required to immediately notify the following regulatory authorities

- NSW EPA
- Fire and Rescue NSW
- NSW Health (Newcastle Public Health Unit)
- Safework NSW
- ComCare
- Cessnock City Council, and
- NSW Department of Planning, Housing and Infrastructure

Where a decision is made to notify authorities of an environmental pollution incident, the information provided should include the following:

- the time, date, nature, duration and location of the incident, and if different, the place where pollution is occurring, or likely to occur;
- the nature, estimated quantity or volume, and the concentration of any pollutants (if known);
- the circumstances in which the incident occurred (including the cause, if known); and
- the action taken to deal with the incident and any resulting pollution.

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Revision: 5.1	Snowy Hydro Limited - Kurri Kurri Power Station Operational Environmental Management Plan	Page 49 of 84

In addition to immediately notifying the above regulatory Authorities, the EPBC Approval requires Snowy Hydro to notify the Federal DCCEE within two business days. Within ten days of becoming aware of the incident, Snowy Hydro must provide further details of the incident including any corrective actions implemented or proposed, potential impacts, and details of any remedial actions to be undertaken.

As per Part 5.7 of the POEO Act 1997, harm to the environment is material if it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations). It does not include an incident or set of circumstances involving only the emission of noise.

The ERH contains relevant contact details and the defined process used to notify the local community in the vicinity of KKPS, should they be potentially impacted by a pollution incident. The KKPS ERH is available internally to all personnel on the Snowy Hydro Intranet (The Grid), and a public version of the PIRMP, as required under the POEO Act 1997, is accessible on the Snowy Hydro website.

4.3.2a External Non-compliance Notification

Condition C7 of the SSI approval requires Snowy Hydro to notify the DPHI Secretary of any non-compliance after Snowy Hydro becomes aware of a non-compliance occurring. The notification is required to be made in writing via the Major Projects Portal, within 7 days of becoming aware of the non-compliance.

Within the non-compliance notification, the following details must be included:

- The development: Snowy Hydro's Kurri Kuri Power Station
- The application number: SSI-12590060
- The condition/s that were not complied with
- The reasons for the non-compliance (if they are known)
- Actions that have been taken, or will be undertaken to address the non-compliance.

For clarity on DPHI incident and non-compliance notification requirements:

- A non-compliance that has escalated to an incident, requires a new notification in accordance with Condition C6 of the SSI Approval
- An incident that has been previously reported under Condition C6 of the SSI Approval does not need additional notification as a non-compliance.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 50 of 84

4.3.2b Annual Compliance Report

Condition C10 of the SSI Approval requires Snowy Hydro to prepare an annual Compliance Report for KKPS in accordance with the DPHI's [Compliance Reporting Post Approval Requirements \(May 2020\)](#), or the latest version of this document.

The initial Annual Compliance Report is required at an interval no later than 52 weeks from the commencement of operations, then annually thereafter, unless otherwise agreed with in writing by the DPHI Secretary.

Following submission to DPHI, the Annual Compliance Report shall be made publicly available on the Snowy Hydro website within 60 days.

It is noted that irrespective of the requirements specified in DPHI's Compliance Reporting Post Approval Requirements (May 2020), the DPHI Secretary may approve a request to cease the requirement for ongoing Annual Compliance Reports, where the Secretary is satisfied that an annual compliance report has demonstrated operational compliance.

4.3.3 Statutory Environmental Reporting and Notifications

Table 4.2 provides a summary of the statutory reporting and notification requirements specified in EPL13036, the SSI Approval, EPBC Approval, and national emissions reporting requirements.

Table 4.2: Summary of Statutory Reporting and Notification Requirements

Requirement	Reference	Report to (and method)	Timing/Frequency
Environment Protection Licence 21627			
Notification of exceedances to operating hour limits	Condition L7.6	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Within 24 hours of any activation of L7.5
Annual Return	Condition R1	NSW EPA via eConnect Portal	Annually within 60 days of 31 January
Notification of Environmental Harm	Condition R2.1	NSW EPA via 131 555 Also other regulatory agencies as per Part 5.7 of the POEO Act	Immediately after becoming aware of an incident that is causing or threatening material harm to the environment
	Condition 2.2	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Within 7 days after becoming aware of an incident that has caused or threatened material harm to the environment

Requirement	Reference	Report to (and method)	Timing/Frequency
Written Report requested by the EPA in relation to a suspected event	Condition R3 (R3.1-R3.4)	NSW EPA via method as specified	As required within specified timeframes
Submission of Post-Commissioning and Annual Noise Compliance Assessment Reports	Condition R4.1	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Annually within 30 days of completion of annual noise monitoring
Notification of exceedance to air emission limit	Condition R4.2	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Within 5 days of becoming aware of an exceedance of air emission limits
	Condition R4.3	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Within 20 days of the notification made in accordance with Condition R4.2
Submission of Post-Commissioning Air Quality Verification Assessment Report	Condition E1.2	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Once off submission within 6 weeks of completion of post-commissioning air quality verification monitoring as required by condition E1.1 (and SSI-12590060-Mod-2 condition B8)
State Significant Infrastructure Approval SSI-12590060-Mod-2			
Notification of exceedances to operating hour limits, or activation of condition A11	Condition A12	Secretary (NSW DPHI) via Major Projects Portal <i>and</i> NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Within 24 hours of any exceedance, or activation of condition A11 (consistent with EPL21627)
Notification of the use of non-compliant diesel fuel	Condition A12	Secretary (NSW DPHI) via Major Projects Portal <i>and</i> NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	As soon as practicable after becoming aware (timing not specified) of each use of non-compliant diesel fuel
Notification of the commencement of site decommissioning	Condition A15(d)	NSW DPHI via Major Projects Portal	At least 2 weeks prior to the commencement of site decommissioning activities
Submission of Post-Commissioning Air Quality Verification Assessment Report	Condition B8	NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Once off submission within 6 weeks of completion of post-commissioning air quality verification monitoring as required by condition B7 (and EPL 21627 cond. E1.2)

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Requirement	Reference	Report to (and method)	Timing/Frequency
Submission of Post-Startup Compliance Report	Condition B15	Secretary (NSW DPHI) via Major Projects Portal	Once off submission within 3 months after the commencement of operations.
Submission of an Independent Site Hazard Audit Report	Condition B16	Secretary (NSW DPHI) via Major Projects Portal	Submission of a report within 2 months of the completion of each hazard audit. The Hazard Audit will be completed 12 months after the commencement of operations and every 3 years thereafter (or as otherwise agreed with the Secretary)
Submission of Post-Commissioning and Annual Noise Compliance Assessment Reports	Condition B27	Secretary (NSW DPHI) via Major Projects Portal and NSW EPA via email to info@epa.nsw.gov.au and cc local EPA officer	Within 30 days of completion of post-commissioning validation monitoring and any annual noise monitoring
Submission of Net Zero Power Generation Plan Implementation Report	Condition C3	Secretary (NSW DPHI) via Major Projects Portal	Every 3 years following the approval of the Net Zero Power Generation Plan
Submission of revised documents required as a condition of approval	Condition C5	Secretary (NSW DPHI) via Major Projects Portal	Within 3 months of the activation of condition C5, review and if required, revise documentation. Any revised document to be submitted within 4 weeks of the review.
Notification of an Incident	Condition C6	Secretary (NSW DPHI) via Major Projects Portal	Immediately after becoming aware of an incident that is causing or threatening material harm to the environment
	Condition C6 Appendix 4 (cond. 1 & 2)	Secretary (NSW DPHI) via Major Projects Portal	Within 7 days of becoming aware of an incident that is causing or threatening material harm to the environment
	Condition C6 Appendix 4 (cond. 3 & 4)	Secretary (NSW DPHI) and relevant public authorities as determined by the Secretary	Within 30 days of the date on which an incident that is causing or threatening material harm to the environment has occurred

Requirement	Reference	Report to (and method)	Timing/Frequency
Notification of a Non-compliance	Condition C7	Secretary (NSW DPHI) via Major Projects Portal	Within 7 days of becoming aware of any non-compliance. Note: this excludes any non-compliance already reported as an incident under condition C6.
Submission of Annual Compliance Report	Condition C11	NSW DPHI via Major Projects Portal	Within 12 months of the commencement of operations and annually thereafter
Notification of the date of a development upgrade, decommissioning, or cessation of operations	Condition C14	NSW DPHI via Major Projects Portal	Prior to the commencement of an upgrade, decommissioning, or cessation of operations.
Submission of Independent Audit Report and Response to Audit Findings	Condition C18	Secretary (NSW DPHI) via Major Projects Portal	Within 2 months of undertaking the independent audit site inspection. The initial independent audit is to be completed within 6 months of the commencement of operations, then at intervals no greater than 3 yearly thereafter.
EPBC Approval 2021/8888			
Submission of Records of Compliance	Condition 6	DCCEEW via method specified in the written request	Upon request, within the timeframe specified in the request
Notification of the publication of an Annual Compliance Report	Condition 7b	DCCEEW via email to epbcmonitoring@dcceew.gov.au	Within 5 business days of the date of publication/upload of the Annual Compliance Report on the Snowy Hydro website
Notification of an incident as defined by the terms of the EPBC approval, non-compliance with the EPBC conditions.	Condition 8	DCCEEW via email to environment.compliance@dcceew.gov.au	Notification to be made as soon as practicable, and no later than 2 business days after becoming aware of the incident or non-compliance.
	Condition 9	DCCEEW via email to environment.compliance@dcceew.gov.au	Submission of further details of a notification made under Condition 8, as soon as practicable, and no later than 10 business days after becoming aware of the incident or non-compliance.

Requirement	Reference	Report to (and method)	Timing/Frequency
Notification of independent auditor details and audit criteria	Condition 11a	DCCEEW via email to epbcmonitoring@dccee.w.gov.au	Prior to the commencement of each independent audit Note: the independent audit may only commence following written approval by DCCEEW (condition 11b)
Submission of Independent Compliance Audit	Condition 11c	DCCEEW via email to epbcmonitoring@dccee.w.gov.au	Within the timeframe specified in the DCCEEW's approval of the audit criteria
Notification of completion of actions and submission of a supporting completion report	Condition 13	DCCEEW via email to epbcmonitoring@dccee.w.gov.au	Within 30 days after the completion of action
Notification of proposed changes to the State Approval	Condition 14	DCCEEW via email to epbcmonitoring@dccee.w.gov.au	Within 2 business days of a formal modification application, or within 5 days of becoming aware of a modification application
Notification of a modification to the State Approval	Condition 15	DCCEEW via email to epbcmonitoring@dccee.w.gov.au	Within 10 business days of a modification to the State Approval being finalised.
National Emissions Reporting			
National Pollutant Inventory (NPI) Report	<i>POEO (General) Regulation 2022 (NSW)</i> <i>National Environment Protection (National Pollutant Inventory) Measure 1998 (Cth)</i>	DCCEEW via NPI Online Reporting System	Annually by 30 September
National Greenhouse and Energy Report (NGER)	<i>National Greenhouse and Energy Reporting Act 2007 (Cth)</i>	Clean Energy Regulator via Emissions and Energy Reporting System (EERS)	Annually by 31 October
Mandatory Climate/Sustainability Reporting			

Requirement	Reference	Report to (and method)	Timing/Frequency
Annual Sustainability Report containing mandatory climate-related financial disclosures	<i>Corporations Act 2001</i> (Cth)	Australian Securities and Investments Commission (ASIC)	The first report required for FY2026 must be submitted by 30 September 2026, and annually thereafter.

4.4 Training

Training at Snowy Hydro is developed in accordance with the procedure QP 18-01 Training and Development, and is administered in the company's Learning Management System (LMS) which maintains training requirements for individuals and completion records of training attended.

Personnel working at KKPS receive training relevant to their role and the required skills to fulfil their role in a competent manner. Environmental related training and awareness packages are described in **Table 4.3** below.

Table 4.3: Environmental Training Packages at Kurri Kurri Power Station

Training Package	Description	Frequency
Environmental Induction	All employees and contractors are required to complete the Snowy Hydro environmental induction.	3 yearly
KKPS Site Induction	All employees and contractors are required to complete the KKPS Site Induction before duties can be taken up. The KKPS Site Induction includes a site specific Environment section.	3 yearly (employees) Annually (contractors)
Safety Induction and Operational Risk Training	All employees are trained through a three stage program beginning with behavioural safety, application of operational risk processes, and incident management.	3 yearly (Safety Induction) and as required
Environmental Compliance Training	Outlines compliance obligations at KKPS for all site personnel, the nature of the obligations and duties with regard to compliance.	3-5 yearly/as required
Incident investigation training	Selected employees responsible for leading incident investigations are trained in the Incident Cause & Analysis Method (ICAM) of incident investigation.	As Required
Spill Prevention and Response Training	All employees are required to complete the course to ensure an understanding of basic spill prevention and how to respond if they encounter a spill. Training includes education on the responsibilities of Snowy Hydro and the individual.	3 yearly
Site Pollution Response Training	The Pollution Incident Response Management Plan (PIRMP) is tested annually providing an exercise and training in the practices under that plan as described in the KKPS Emergency Response Handbook.	Annually
Specialised Environmental Training	Specific issues and activities may require further training or briefings, for example in the use of specific spill kits, monitoring equipment, or notification requirements to regulators in the event of an incident.	As Required
Environmental Standards Handbook	Provides environmental awareness guidelines and sets the expectations around the standards expected at Snowy Hydro sites.	NA - Available to all employees on the Grid
Environmental Toolbox Presentations	Provide targeted environmental awareness presentations for specific environmental aspects at Snowy Hydro sites.	NA - Available to all employees on the Grid

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5.0 Environmental Management Measures

The following environmental aspects are considered to warrant specific management actions for the operation of KKPS. These issues:

- have specific regulatory requirements (contained in the SSI Approval and/or EPL21627),
- are considered to have the highest potential to result in a non-compliance with a legislative requirement, may generate community complaints, and/or
- have been identified as the most significant environmental aspect.

For environmental aspects where an individual Management Plan has not been developed, management and mitigation controls for that aspect are outlined in the following sections.

Through the implementation of these management measures and plans, Snowy Hydro commits to minimising any material harm to the environment that may result from KKPS operations.

Management Plan Consultation

Prior to submission to DPHI, OEMP sub-plans were provided to parties as nominated in the relevant SSI Approval conditions for that plan. A summary of consultation for each OEMP sub-plan, and the response received is provided in **Table 5.1**.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 58 of 84

Table 5.1: OEMP sub-plans and consultation requirements

Condition	Management Plan	Consulted Group/s	Date consulted	Response Summary
B33	Biodiversity Management Plan	Conservation Programs, Heritage & Regulation Group (CPHR) - acting as BCS	Email, 29/9/2025	Clarification on further vegetation clearing requirements during operations. <i>Note - no vegetation clearing required during KKPS operations</i>
B40	Water Management Plan	EPA	Email, 29/9/2025	No comments
		DPE Water	Email, 29/9/2025	No comments
		Hunter Water Corporation	Email, 29/9/2025	No comments relating to the Water MP
		Cessnock City Council	Email, 29/9/2025	No comments
B43	Cultural Heritage Management Plan	Heritage NSW	Email, 29/9/2025	No comments
		Registered Aboriginal Parties	Emails to RAP's, 7/10/2025	No comments relating to the CHMP
B48	Traffic Management Plan	Cessnock City Council	Email, 29/9/2025	No comments
		Transport for NSW	Email, 29/9/2025	No comments
C1	Environmental Management Strategy (Operational Environmental Management Plan)	No consultation requirements	N/A	N/A
C1(e)(i)	Air Quality Management Plan	EPA	Email, 29/9/2025	No comments
C1(e)(i)	Noise Management Plan	EPA	Email, 29/9/2025	No comments
C1(e)(i)	Waste Management Plan	No consultation requirements	N/A	N/A

5.1 Air Quality

As per SSI Approval, Condition C1(e)(i), an Air Quality Management Plan (Air Quality MP) has been developed for KKPS. The Air Quality MP has been developed as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website.

5.2 Water

As per SSI Approval, Condition B40, a Water Management Plan (Water MP) has been developed for KKPS. The Water MP also requires the inclusion of a:

- Site Water Balance
- Surface Water Management Plan
- Groundwater Management Plan

The Water MP, incorporating a site water balance, surface water and groundwater management plans, has been developed as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website. A key management measure, and EIS commitment, to mitigate potential groundwater impacts from leaks and spills was to incorporate a spill response plan in the OEMP. This is provided below in **Section 5.2.1**.

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 60 of 84

5.2.1 Spill Response Plan

The primary method to manage and mitigate contaminated land and potential impacts to groundwater at KKPS is the implementation of mandatory spill prevention and response training for all workers.

The core framework of spill prevention and response at Snowy Hydro involves the following four elements:

- **Compliance:** This involves understanding the site specific response requirements and where to obtain this information, which is primarily the KKPS Emergency Response Handbook
- **Procedures and Standards:** Snowy Hydro maintains a series of key documents that form part of the spill prevention and response framework, including
 - QP24-19: Storage, Transport and Disposal of Hazardous Waste
 - QP25-23: Bund Management Procedure
 - QP09-58: Oil Management
 - SCP040: Transformer Oil Handling
 - QP25-16: Operational Risk Management
- **Spill Prevention:** Ensuring appropriate bunding, storage, handling and transport of hazardous chemicals and dangerous goods in accordance with Snowy Hydro procedures (listed above), and applicable legislation. This also incorporates the appropriate design of temporary or permanent bunding and secondary containment measures
- **Spill Response:** Detailing the first response actions required when responding to a leak or a spill, including
 - an assessment and initial notification of the spill,
 - containment of the spill to prevent further potential impacts,
 - cleaning the spill and the equipment to use, and
 - reporting/recording the spill.

5.3 Noise

As per SSI Approval, Condition C1(e)(i), a Noise Management Plan (Noise MP) has been developed for KKPS. The Noise MP has been developed as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website.

5.4 Biodiversity

As per SSI Approval, Condition B33, a Biodiversity Management Plan (Biodiversity MP) has been developed for KKPS. The Biodiversity MP has been developed as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website.

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 61 of 84

5.5 Cultural Heritage

As per SSI Approval, Condition B43, a Cultural Heritage Management Plan (Cultural Heritage MP) has been developed for KKPS. The Cultural Heritage MP has been developed as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website.

5.5.1 Non-Aboriginal Heritage

The EIS for the KKPS indicated that there were no non-Aboriginal heritage items within, or in close proximity to the KKPS Site. KKPS operations would have no direct impact or visual impact on any nearby heritage items.

5.6 Waste

As per SSI Approval, Condition C1(e)(i), a Waste Management Plan (Waste MP) has been developed for KKPS. The Waste MP has been developed as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website.

5.7 Traffic

As per SSI Approval, Condition B48, a Traffic Management Plan (Traffic MP) has been developed for KKPS. The Traffic MP has been prepared as a separate subplan to this OEMP and can be accessed on the Snowy Hydro website.

The Traffic Management Plan for KKPS may be accessed on the Snowy Hydro Website.

5.8 Hazardous Materials

Throughout KKPS operations, impacts and risks associated with hazardous materials, such as chemicals and diesel fuel, occur during their transport to/from site, their use onsite, and their onsite storage. Measures to appropriately manage and mitigate the risks associated with hazardous materials are detailed in **Table 5.2** below.

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 62 of 84

Table 5.2: Hazardous material management and mitigation measures

Aspect	Description
<i>Design</i>	- Hazards, risks and safety will be appropriately considered and prioritised in selection and design processes, and equipment specifications throughout KKPS operations - Potential exposures to electromagnetic fields (EMF) at KKPS will be considered for staff and contractors as part of health and safety management practices.
<i>Storage & Handling</i>	- Compliance with AS 1940 for the storage and handling of all flammable and combustible liquids, including diesel fuel. - Storage of all hazardous chemicals, fuels and oils in accordance with EPL21627, the SSI Approval, Australian Standards, industry guidelines, and Snowy Hydro procedures, which include storage within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund. - Storage and handling of liquid chemicals in accordance with the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook - In the event of an inconsistency between EPL/SSI requirements, Australian standards, industry guidelines and Snowy Hydro procedures, the most stringent requirement shall apply - For the purpose of SSI Approval condition B17 (storage and handling of chemicals fuels and oils), any tanks or other storage vessels that are interconnected and may distribute their contents either by gravity or automated pumps are considered a single vessel, therefore bunding and secondary containment measures consider this total volume.

5.9 Bushfire Risk

To appropriately manage and mitigate the risks associated from bushfires during KKPS Operations, the measures detailed in **Table 5.3** shall be implemented:

Table 5.3: Bushfire management and mitigation measures

Aspect	Description
<i>Strategic Fire Advantage Zone</i>	The Hunter BFRMP (Hunter BFMC, 2009) identifies a SFAZ around the former Hydro Aluminium facility, and includes areas of native vegetation and cleared land that surround KKPS. Bushfire fuel hazard in this area is actively maintained (by RFS) by periodic hazard reduction burning in the larger blocks of native vegetation. This is designed to moderate fire behaviour and reduce the risks posed to people and infrastructure by radiant heat and embers
<i>Asset Protection Zone</i>	- A 10m APZ is designated for KKPS along the northern and north eastern site boundaries. The provision of this APZ is consistent with: <i>ISSC3 Guide for the management of vegetation in the vicinity of electricity assets</i> (Industry Safety Steering Committee [ISSC], 2016) specifications for APZ for substations/switchyards).' - Planning for Bushfire Protection (NSW RFS, 2019a) specifications for renewable energy generation facilities. - The designated APZ will be actively maintained, with periodic inspections and implementation of vegetation control measures (mowing/slashing and weed

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	management) to ensure vegetation growth within the APZ is minimised. • An access track has been established around the entire site boundary to enable easy vehicular access for emergency services. • An APZ along the eastern, southern and western boundaries of KKPS has not been specified, due to the lack of existing vegetation and not being identified as bushfire prone land.
<i>Location of sensitive buildings and hazardous materials</i>	• The location of all sensitive areas of site ensure the expected exposure to radiant heat from a bushfire is less than 12.5 W/m² (BAL-12.5).
<i>Site Access</i>	• In the event of a fire, emergency services would access the site via Hart Road. • Internal roads within KKPS would be available for emergency services if required. • An access track has been established around the entire site boundary to enable easy vehicular access for emergency services
<i>Water for firefighting</i>	• KKPS has 2x 550kL firewater storage tanks and associated pumping infrastructure to provide adequate fire response capabilities • The site is connected to the Hunter Water potable water network to boost supply • Fire Hydrants and boosters are positioned around KKPS to enable appropriate response/support in the event of a bushfire.
<i>Emergency Management</i>	• Onsite bushfire emergency management arrangements are detailed in the KKPS Emergency Response Handbook.

5.10 Aviation

To appropriately manage and mitigate the risks from KKPS operations to aeronautical activities are described below in **Table 5.4** shall be implemented:

Table 5.4: Aeronautical management measures

Aspect	Description
<i>Plume Rise/ Aeronautical Controls</i>	• A plume rise symbol has been incorporated on relevant aeronautical navigation charts, to alert pilots to the potential for turbulence in airspace above • The 'Additional information' section in the ERSA Aerodrome pages for Maitland and Cessnock Airports include notes and a diagram in respect of potential for turbulence in airspace above KKPS • GT1 & GT2 exhaust stacks incorporate lighting that is activated when the power station is operating.

5.11 Visual and Lighting

To appropriately manage and mitigate the risks on the landscape character and visual amenity from KKPS operations are described below in **Table 5.5**.

Table 5.5: Landscape and Visual Amenity management measures

Aspect	Description
<i>Visual Character</i>	- Surfaces and finishes of KKPS and associated infrastructure have been designed to reduce visual bulk and contrast of large surfaces and elements, allowing them to blend into the context of the surrounding area. - Unless required for safety or identification purposes, no commercial advertising signage and/or logos have been mounted/installed at KKPS
<i>Obtrusive lighting</i>	- Offsite impacts due to light spill from security lighting is minimised by adhering to Australian Standards (AS/NZ 4282:2019 Control of the obtrusive effects of outdoor lighting), and where applicable, implementing measures such as baffling, downward direction of lighting and sensor-triggered lighting - Low intensity lighting (except where required for safety or emergency purposes) has been utilised for all external lighting at KKPS - Offsite visual impacts of KKPS are minimised as follows: - Lights will be turned off when not needed, including security lights. - Sensor switches will be installed for permanent lighting on outside lights. - Lighting, where practicable, is located as far as possible from neighbours and away from sensitive areas. - Existing features surrounding the site such as existing bushland, is used to mitigate the light source from view. - Wherever possible, lighting is directed towards the target area, and if there is no alternative to up-lighting, fit shields and baffles have been applied as required to mitigate light spillage to a minimum.

5.12 Pollution Incident Response Management Plan (PIRMP)

Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act), specifies that all holders of an Environment Protection Licence are required to prepare, keep, test and implement a PIRMP.

Snowy Hydro has developed and implements an Emergency Response Handbook for the Kurri Kurri Power Station, which addresses all requirements for a PIRMP as specified by Chapter 4 of the General Regulation.

The Emergency Response Handbook describes the procedures to be implemented by Snowy Hydro in the response to all site emergencies, including an environmental pollution incident, and addresses:

- The implementation and maintenance of a documented process to identify and respond to an emergency
- Regular review and training for site personnel for the identified emergencies and scenarios

<i>Document is uncontrolled when downloaded or printed</i>		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 65 of 84

- Description of the facility , including key systems
- Emergency planning, including emergency documentation, roles and responsibilities, crisis response, site evacuation
- Incident communications
- Response to various emergencies including fire, natural disaster, and environmental pollution incidents.

Snowy Hydro also maintains a public version of the KKPS PIRMP to address the requirements of 74(3) of the General Regulation which specifies the parts of the PIRMP to be made available on a publicly accessible website.

The public website version of the KKPS PIRMP may be accessed on the Snowy Hydro Website.

5.13 Net Zero Power Generation Plan

As per Condition C2 of the SSI Approval, Snowy Hydro is required to prepare a Net Zero Power Generation Plan (NZPGP) for KKPS to the satisfaction of the Planning Secretary.

The NZPGP was prepared by HRL Technology Group Pty Ltd, in consultation with the EPA and DPHI's Climate and Atmospheric Science Group. The NZPGP investigates the available opportunities for KKPS to achieve Net Zero emissions in consideration of Commonwealth and State based emission targets, contemporary best proactive and continuous improvement, and the latest technologies to displace natural gas or diesel as fuel supplies.

The NZPGP describes the measures Snowy Hydro will pursue to displace and offset emissions in regards to the following Net Zero Targets that are defined by Condition C2(d) of the SSI Approval:

- **Between the commencement of operations and 2029:** 10% of total Scope 1 GHG emissions
- **From 2030 to 2039:** All Scope 1 GHG emissions as a result of generating electrical power at KKPS for more than 175 cumulative hours per calendar year (or 2% of the year).
- **From 2040 onwards:** All Scope 1 emissions from KKPS

Every three years following the original approval of the NZPGP, Snowy Hydro shall submit a report to the Planning Secretary, updating the outcomes of investigations and measures described in the NZPGP.

The NZPGP for KKPS, and any subsequent reports submitted to DPHI regarding the implementation of the NZPGP may be accessed on the Snowy Hydro website.

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 66 of 84

6.0 Community

6.1 Snowy Hydro Website

Snowy Hydro maintains a public website to provide regular, up-to-date information regarding Kurri Kurri PS. To address the requirements of Condition C20 of the SSI Approval, the website contains the following information:

- The KKPS EIS
- All statutory approvals for KKPS, including the SSI Approval, EPBC Approval and EPL.
- All approved strategies, plans and programs required under the conditions of the SSI Approval
- The staging plans for the KKPS for construction, operations or decommissioning of the facility
- Regular reporting on the environmental performance of the KKPS in accordance with any plans or programs approved under the SSI Approval
- Comprehensive summary of the environmental monitoring results for the KKPS, including the publication of monitoring data required as a condition of the EPL
- A summary of the current phase and progress of the KKPS
- Contact details to enquire about the KKPS or to make a complaint
- A complaints register, updated monthly
- Annual Compliance Report for the KKPS
- Independent Environmental Audit Reports and Snowy Hydro's response to the recommendations for each audit report
- The public version of the KKPS Pollution Incident Response Management Plan (PIRMP) as required under Part 5.7A of the POEO Act, and Chapter 4 of the POEO (General) Regulation
- Any other matter required by the DPHI Secretary

6.2 Community Enquiries, Complaints and Feedback

Snowy Hydro maintains several avenues for members of the community to make contact in relation to any aspect of KKPS. In addition to a dedicated telephone complaints line required by condition M7 of EPL21627, Snowy Hydro can also be contacted by email and via post.

Contact details for community complaints, enquiries and other feedback relevant to KKPS are:

Telephone: 1800 766 333 (freecall)
Email: info@snowyhydro.com.au
Post: PO Box 332
Cooma NSW 2630

These contact details are advertised to the public on the Snowy Hydro website, in the White Pages telephone directory. The telephone number is also provided in the KKPS PIRMP.

Should a community complaint be received, the protocol outlined in **Section 6.2.1** shall be utilised.

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 67 of 84

6.2.1 Community Complaints Management Protocol

Community Complaints Management Protocol	
Performance Objective	To ensure a response to a community complaint in relation to the Kurri Kurri Power Station is appropriate.
Regulatory/ Statutory Requirements	• EPL21627 • SSI Approval • Protection of the Environment Operations Act 1997 and Regulations. • Environmental Planning & Assessment Act 1979 and Regulations.
Performance Criteria	• Methods of contact have been established for members of the community to reach Snowy Hydro • All community complaints relating to the environmental and/or operational performance of the Kurri Kurri Power Station are recorded as incidents in the Snowy Hydro Events management System • All community complaints are followed up, investigated and responded to in a timely manner
Responsible Person/s	The KKPS Plant Manager is responsible for receiving community complaints and ensuring that each complaint is recorded in Snowy Hydros event management system, responded to and investigated appropriately. To ensure the management of a community complaint is adequate, additional resources may be required to provide assistance as required, including the Corporate Affairs team and Senior Environmental Advisor.
Implementation Strategy/ Mitigation Methods	As per EPL21627 and the SSI Approval a community complaints register is required to be maintained. At Snowy Hydro, community complaints are formally managed through the Event Management System (Enablon), and as such is taken to be the official community complaints register. Once a complaint has been entered, all aspects of the complaint, including any investigations, and corrective actions are able to be tracked and records maintained. All complaints shall, wherever possible, be directed to the KKPS Plant Manager. In the absence of the KKPS Plant Manager, the person receiving the community complaint shall notify the Northern Gas & Diesels Area Manager. The KKPS Plant Manager shall notify the Corporate Affairs and the Senior Environmental Advisor of any complaints received. When receiving a community complaint, the following details recorded (as detailed in the F14-07-E Community Complaint Response Form): • The date and time of the complaint • The method by which the complaint was made • Any personal / contact 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 will be documented. The record of a complaint must be kept for at least 4 years, and made available to the EPA and DPHI upon request.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 68 of 84
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Monitoring	Targeted environmental monitoring may be conducted in response to a community complaint. The extent, nature, and location of this monitoring will be determined on a case by case basis to ensure it is appropriate for the matter being investigated.
Reporting	Where external reporting of community complaints to regulatory agencies is required, the Senior Environment Advisor is responsible for making these reports in accordance with the relevant licence, approval and/or permit condition/s. An updated complaints register is uploaded to the Snowy Hydro website each month as specified by the SSI Approval (condition C20(a)(ix)) Relevant information regarding all genuine community complaints received are reported to the EPA via the Annual Return for EPL21627, and Annual Compliance Reports submitted to DPHI and the federal DCCEEW.

7.0 Audits and Inspections

7.1 Regular Site Based Inspections

Weekly walkthrough inspections are undertaken by site personnel. These inspections consist of visual inspection of all work areas and environmentally related activities in and around the site in order to check the condition of the site and any possible environmental issues. The inspections include:

- NOx water and fuel oil systems
- Bund integrity
- Roadways and drains
- General housekeeping
- Leaks and drips of oil or residues
- Energised equipment and alarming
- Transformers, generator skid, auxiliary plant
- Excessive vibrations from site activities
- Noticeable odour
- Malfunction of continuous analysers
- Water or liquid discharge from any plant and/or off-site
- Oil/water separator and dirty water capture points functionality and cleanliness; and
- Spillage/issues with solid waste (bins) and liquid waste storage areas.

7.2 Internal Audits

Internal audits are undertaken to verify ongoing compliance to statutory and legislative requirements. Internal audits also assess the performance of various environmental aspects and identify potential improvement opportunities. Internal Audits form part of the compliance tracking program.

At a minimum, an internal audit will be conducted at least annually, in accordance with the Environmental Audit Schedule and may have a strategic purpose, with a focus on a particular CGS Management System Element, Management Plan, or an aspect with a wider business focus. Audits focussing on the environmental management system will use the ISO14001 framework as a guide to identify whether the environmental management practices at KKPS are being maintained in accordance with ISO14001 requirements. Findings and recommendations will be reported and tracked as actions in the Snowy Hydro Event Management System (Enablon).

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 70 of 84

7.3 External Audits

7.3.1 SSI Independent Compliance Audit

Conditions C15 to C19 of the SSI Approval specifies the requirements for independent environmental compliance audits of the Kurri Kurri PS. In accordance with the [Independent Audit Post Approval Requirements \(2020\)](#) referenced in condition C15, the initial independent audit shall be completed within 6 months of the commencement of operations, then at intervals of no greater than three years thereafter.

The Independent Compliance Audit must:

- Be conducted and carried in accordance with the Independent Audit Post Approval Requirements (2020) or its latest version (Condition C15)
- Be carried out by independent auditors that have been agreed in writing by the DPHI Secretary prior to the commencement of each audit (Condition C16)

The Independent Audit Report produced for each audit and Snowy Hydro's response to the audit findings must be submitted to the DPHI Secretary within two months of completing the site inspection conducted as part of the audit.

It is noted that irrespective of the requirements specified in DPHI's Independent Audit Post Approval Requirements (2020), the DPHI Secretary may approve a request to cease the requirement for ongoing Independent Compliance Audit, where the Secretary is satisfied that independent compliance audits have demonstrated operational compliance.

7.3.2 SSI Independent Site Hazard Audit

Condition B16 of the SSI Approval specifies that within 12 months of the commencement of operations, and every three years thereafter, Snowy Hydro must engage an independent person, or team to conduct a 'comprehensive' Hazard Audit of the Kurri Kurri PS to the satisfaction of the Secretary of DPHI.

The comprehensive Hazard Audit must:

- Be carried out at Snowy Hydro's expense
- Be carried out by a qualified person or team, that is independent of Snowy Hydro, and be approved by the Secretary of DPHI prior to the commencement of the audit.
- Be carried out in accordance with the Department of Planning's (now DPHI) [Hazard Industry Planning Advisory Paper No. 5, Hazard Audit Guidelines](#)
- Include a review of the Kurri Kurri PS Safety Management System
- Include a review of all entries made in the incident register for Kurri Kurri PS since the previous audit.

Document is uncontrolled when downloaded or printed		
Revision: 5.1	Snowy Hydro Limited - Kurri Kurri Power Station Operational Environmental Management Plan	Page 71 of 84

The subsequent Hazard Audit Report must be submitted within two months of the completion of the audit to DPHI via the Major Projects Portal, and be accompanied by a program developed by Snowy Hydro for the implementation of all recommendations made in the audit report.

7.3.3 EPBC Independent Audit

Under the Federal EPBC Approval of the Kurri Kurri PS, Conditions 10 to 12 specify the requirements of an independent audit of the conditions of the EPBC Approval. As per these conditions, Snowy Hydro must ensure that independent compliance audits of the EPBC conditions of approval are conducted as requested in writing by the Minister administering the EPBC Act, or their delegate.

Following a request for an independent audit, Snowy Hydro must:

- Submit the name and qualifications of the independent auditor, and the draft audit criteria to the DECCWW
- Only commence the independent audit once the audit criteria has been approved in writing by DECCWW
- Submit an audit report to DECCWW within the timeframes specified in the approved audit criteria.

Following approval of the EPBC Independent Audit Report by DECCWW, Snowy Hydro must publish a copy of the report on the Snowy Hydro website within 10 business days.

7.3.4 Environmental Management System

Snowy Hydro maintains its assets in accordance with the ISO14001 Environmental Standard. Annual management system audits are conducted by independent external auditors against the requirements of the ISO14001 Standard to which Snowy Hydro is accredited.

For environmental aspects of the management system, external audits are conducted as 'surveillance' audits once per year, with every third year being a recertification audit.

At present the certified scope of Snowy Hydro's Environmental Management System does not incorporate the Kurri Kurri PS. At the earliest opportunity, the Kurri Kurri PS will be incorporated into the formal scope of accreditation following a certification audit by Snowy Hydro's external EMS auditor.

Participation in site based surveillance audits is determined during the scheduling of the audit by the external auditor.

<i>Document is uncontrolled when downloaded or printed</i>		
Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 72 of 84

7.4 Monitoring Programs

Environmental monitoring shall be conducted throughout KKPS operations to ensure the effectiveness of environmental controls and their implementation. Monitoring is conducted to ensure the obligations specified in the SSI Approval, EPL21627 and other licences/agreements are adequately fulfilled. **Table 7.1** provides a brief overview of the various monitoring programs implemented for KKPS operations. The specific monitoring requirements are included in the individual environmental management plans.

Various aspects being monitored in each separate monitoring program are taken to be the performance criteria for throughout operations at KKPS. It is noted however that performance criteria may be amended (following approval where required), and if this does occur the applicable management plan/s shall be updated to reflect the change.

Each environmental monitoring program for KKPS operations include:

- Details of baseline data and/or specified limits/criteria where available
- Parameters to be monitored
- Frequency of monitoring
- Location of monitoring
- Monitoring reporting requirements
- Procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory

Snowy Hydro is responsible for the implementation of all environmental monitoring programs at KKPS, including the assurance that environmental monitoring equipment is maintained and calibrated according to the manufacturer's specifications, and appropriate records are retained.

Table 7.1: Summary of Environmental Monitoring Programs

Monitoring Program	Monitoring Activity	Frequency
Air Quality	Air Emissions	Continuous
	Annual Stack Emissions	Annual
	RATA testing	Annual
Noise	Attended Noise Monitoring	Annual
	Weather	Continuous
Water	Surface Water Discharge	Monthly during discharge
	Tradewaste/Wastewater Quality	3x per year

8.0 Documentation

8.1 Document Control

Condition A13 of the SSI Approval requires Snowy Hydro to ensure all licences, permits, and approvals are obtained and maintained as required throughout the life of KKPS. Snowy Hydro must also ensure that a copy of the SSI Approval and all other relevant environmental approvals are available at KKPS at all times.

Copies of all key documentation relevant to KKPS are maintained in the Snowy Hydro Document Management System (AODocs)

8.2 Record Keeping

Records must be kept for all monitoring, investigation, communication, agreements, incidents, reports and any other matter that has the potential to be referred to in the future. Documentation and records relating to site operations shall be retained in accordance with the Snowy Hydro procedure QP05-06 Information Asset Management.

EPL21627 specifies documentation and records relating to environmental management, monitoring, and reporting must be retained for a minimum of four years. These records include:

- Air emissions monitoring data and reports
- Water quality monitoring data
- Noise monitoring data and reports
- Weather monitoring data
- Site inspections and walkdowns
- Incident/complaint records
- Waste transport certificates
- Load calculation protocol calculations; and
- Copies of the EPL21627 Annual Return, and supporting data/information.

These documents and records must be available onsite in hard copy or electronically within the Snowy Hydro Document Management System.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 74 of 84

9.0 Document Review

The KKPS OEMP is not a static document, and is regularly reviewed and updated as required to reflect changes in environmental management requirements and/or statutory obligations. Updates to the OEMP might be made in response to:

- scheduled reviews of the OEMP
- regulatory changes
- internal or external audit recommendations
- issues identified in Annual Compliance Reports or EPL Annual Returns
- staff and organisational changes
- incidents and investigation outcomes; and
- new initiatives in environmental management.

The SSI Approval specifies (Condition C5) that within three months of the following listed triggers, Snowy Hydro shall review and, if necessary, revise the OEMP, and relevant studies, strategies or plans required under the SSI Approval. If the review of the relevant document(s) leads to an updated revision, the document(s) will be submitted to DPHI Secretary for approval via the Major Projects Portal within 4 weeks of the document review.

The specified triggers listed under Condition C5 of the SSI approval to review applicable document(s) are:

- DPHI notification of an incident that has caused or threatened material harm (condition C6)
- The submission of an Independent Environmental Audit (conditions C15-C19)
- DPHI granting approval to a modification of any condition in the SSI Approval, or
- A direction from the DPHI Secretary

Notwithstanding the above triggers, Conditions C21 and C22 of the SSI Approval allows for Snowy Hydro to submit revised studies, strategies or plans required for KKPS under a condition of the SSI Approval at any time, and for the DPHI Secretary to approve these at any time.

With the agreement of the DPHI Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis. With the approval of the DPHI Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable conditions in this approval.

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<i>Revision: 5.1</i>	<i>Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan</i>	<i>Page 75 of 84</i>

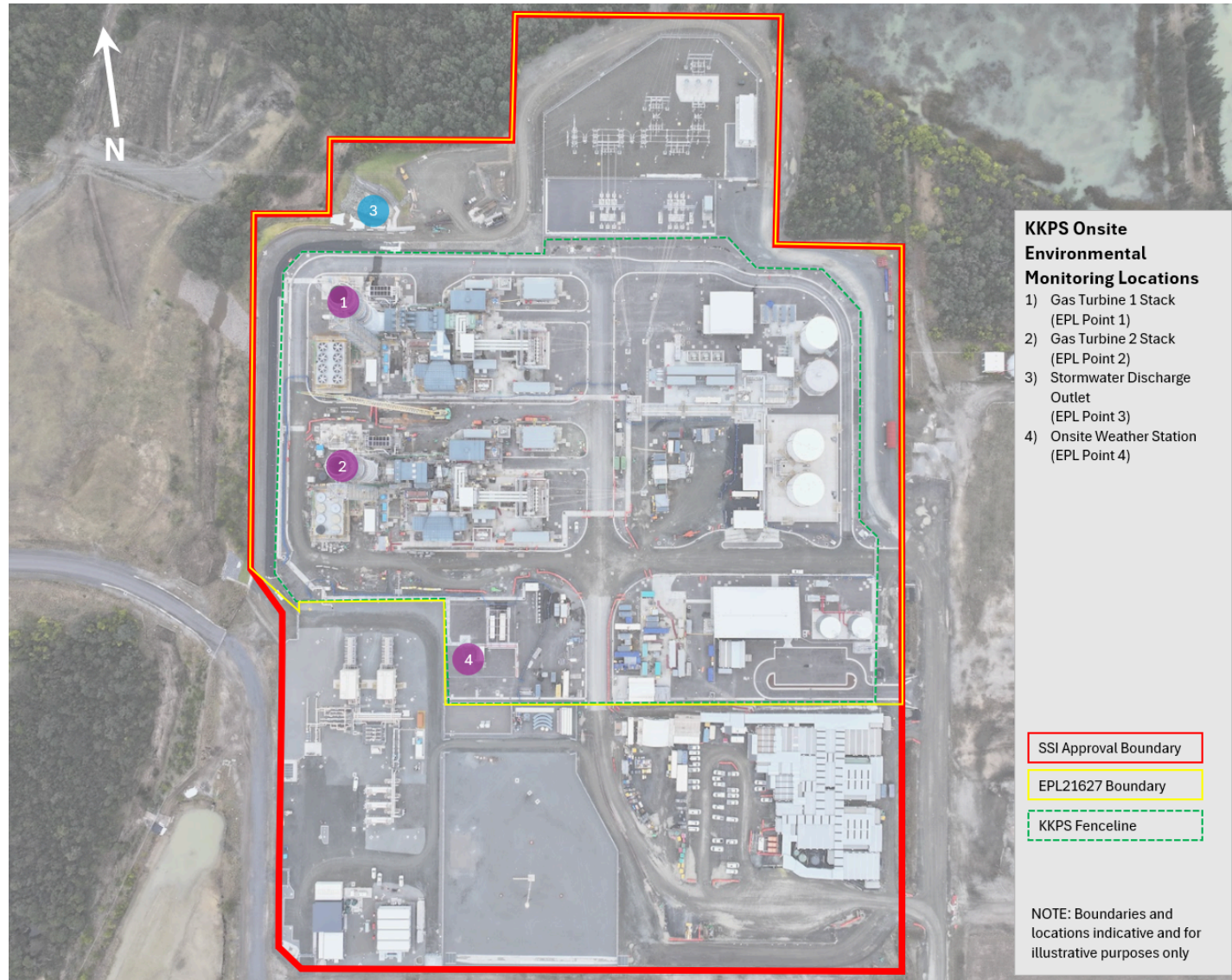
9.1 Document Submission Timeframes

Where a document is required to be submitted in a specified timeframe in accordance with the Conditions of the SSI Approval, Snowy Hydro shall ensure submission timeframes are achieved. However, if required, documentation under the terms of this approval may be submitted within a later timeframe, following written agreement with the DPHI Secretary in accordance with Condition A5 of the SSI Approval.

Please note condition A5 of the SSI Approval does not apply to the immediate written notification requirements for incident reporting to the DPHI.

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 76 of 84

Appendix A: EPL21627 & SSI Approval Monitoring Locations

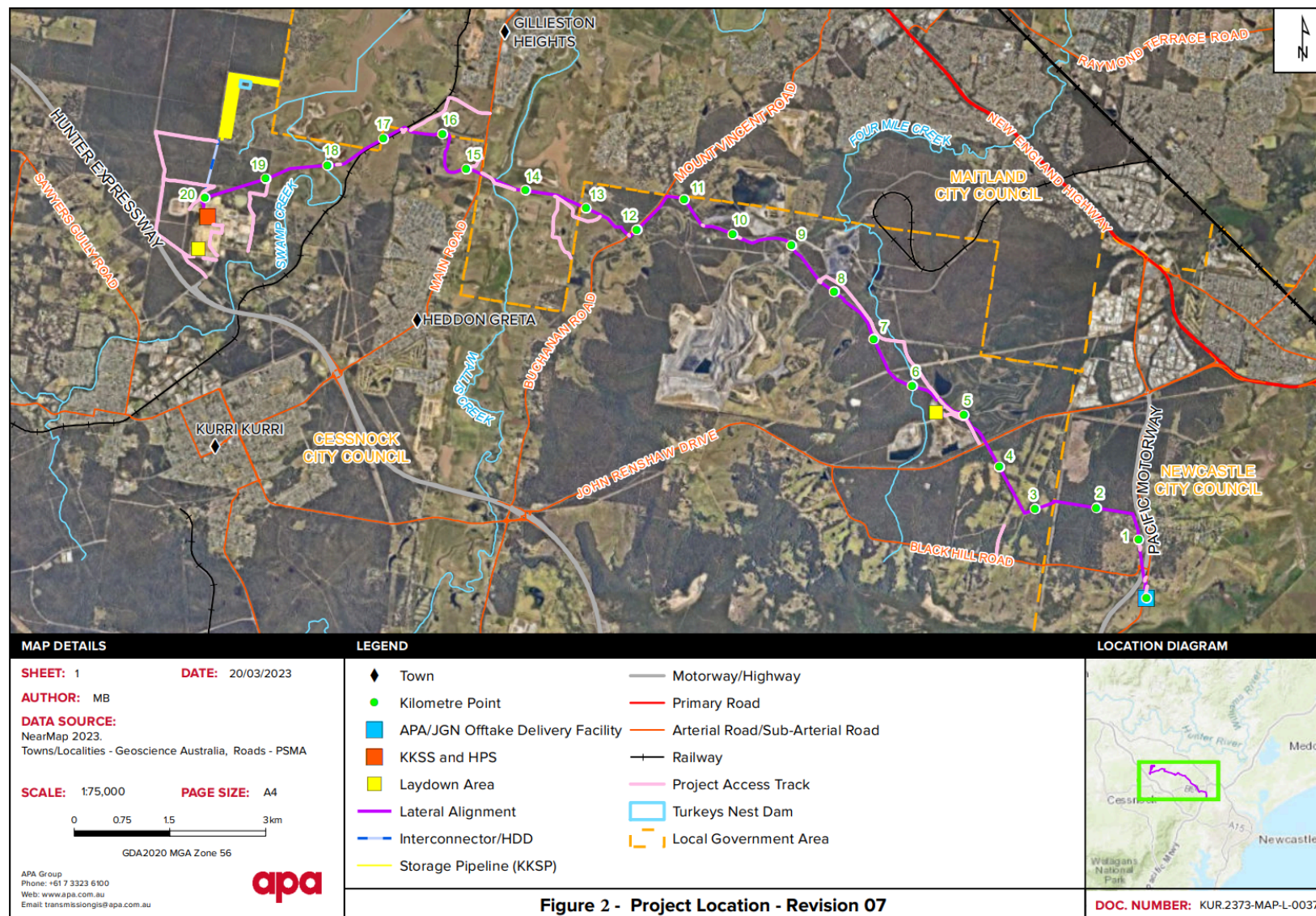


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Appendix B: Kurri Kurri Lateral Pipeline Location



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Appendix C: Environmental Representative Endorsement



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Angela van der Kroft
Environmental Assurance Advisor
Hunter Power Project - Snowy Hydro Limited
Hart Road Loxford NSW 2326

18 December 2024

REF: CEMS AMENDED VER 4 FINAL

Dear Angela,

RE: Construction Environmental Management Strategy Approved Version 4 (27 November 2024)

I refer to Snowy Hydro Limited's (SHL) submission of the following revised document required by Condition C1 of the Hunter Power Project (Kurri Kurri Gas-Fired Power Station) Infrastructure Approval (SSI 12590060) for review and endorsement by the Environmental Representative:

- Hunter Power Project, Snowy Hydro Limited Construction Environmental Management Strategy Approved Version 4 (27 November 2024).

It is noted that:

- The CEMS has been developed by SHL for the works associated with the construction of the project and to address the relevant management requirements of the Infrastructure Approval.
- The CEMS was approved by the Department on 25 January 2022.
- The CEMS incorporates the Construction Air Quality (Version 4 13/12/24), Construction Noise and Vibration (Version 8 29/11/2024) and Construction Waste (Version 3 25/11/2024) Management Plans as required by C1(e)(i).
- This revised version of the CEMS has been amended to incorporate the requirements of the commissioning phase.

Following the review, the document is considered to contain information required by the Conditions of Approval (SSI 12590060) in relation to the CEMS (Condition C1). Noting the above, as the approved Environmental Representative for the Hunter Power Project (Kurri Kurri Gas-Fired Power Station) and as required by Conditions A23(c), the Construction Environmental Management Strategy Approved Version 4 (27 November 2024) and associated subplans is endorsed.

Snowy Hydro Limited and their contractors must continue to obtain and comply with any relevant approval, licence or permit required for the works; complying with relevant Conditions of Approval as they relate to the works; and appropriate notifications being issued prior to the works.

Yours sincerely



Alex Gale
Environmental Representative – Hunter Power Project (Kurri Kurri Gas-Fired Power Station)

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Revision: 5.1	Snowy Hydro Limited – Kurri Kurri Power Station Operational Environmental Management Plan	Page 80 of 84

Angela van der Kroft
Environmental Manager
Hunter Power Project - Snowy Hydro Limited
Hart Road Loxford NSW 2326

22 September 2025

REF: EMS AMENDED VER 5 FINAL

Dear Angela,

RE: Environmental Management Strategy Approved Version 5 (18 August 2025)

I refer to Snowy Hydro Limited's (SHL) submission of the following revised document required by Condition C1 of the Hunter Power Project (Kurri Kurri Gas-Fired Power Station) Infrastructure Approval (SSI 12590060) for review and endorsement by the Environmental Representative:

- Hunter Power Project, Snowy Hydro Limited Environmental Management Strategy Approved Version 5 (18 August 2025).

It is noted that:

- The EMS has been revised by SHL for the works associated with the operation of the project and to address the relevant management requirements of the Infrastructure Approval.
- The EMS was approved by the Department on 25 January 2022.
- The EMS incorporates the Operational Air Quality Management Plan (Version 5 18/08/2025), Operational Noise Management Plan (Version 9 18/08/2025), and Operational Waste Management Plan (Version 3 18/09/2025) as required by C1(e)(i).
- This revised version of the EMS has been amended to incorporate specific requirements of the operation phase.

Following the review, the document is considered to contain information required by the Conditions of Approval (SSI 12590060) in relation to the EMS (Condition C1). Noting the above, as the approved Environmental Representative for the Hunter Power Project (Kurri Kurri Gas-Fired Power Station) and as required by Conditions A23(c), the Environmental Management Strategy Approved Version 5 (18 August 2025) and associated subplans is endorsed.

Snowy Hydro Limited and their contractors must continue to obtain and comply with any relevant approval, licence or permit required for the works; complying with relevant Conditions of Approval as they relate to the works; and appropriate notifications being issued prior to the works.

Yours sincerely



Alex Gale
Environmental Representative – Hunter Power Project (Kurri Kurri Gas-Fired Power Station)

Appendix D: Environment Mitigation Measures - Operations

The following table contains the mitigation measures contained in the Environmental Impact Statement report for the KKPS. This Appendix only includes those mitigation measures relevant to KKPS operations.

Environmental Aspect	EIS Ref	Mitigation Measure	Relevant Management Plan
Hazard & Risk	PHA1	Consideration of hazards, risks and safety will be prioritised in the selection and design processes and equipment specifications, construction, commissioning and operation	OEMP
Hazard & Risk	PHA2	The findings of the PHA and hazard table compiled during the risk workshop will be considered in future design stages and HAZOP workshops to minimise hazards and risks.	OEMP
Bushfire Prone Land	BF3	Bushfire fuel hazard in the surrounding landscape will be managed in accordance with the Hunter Bush Fire Risk Management Plan. A 10 metre Asset Protection Zone (APZ) will be established for the Proposal Site, and a 29 metre APZ will be established for the proposed TWA facility site. Management of the APZ areas will be consistent with: - ISSC3 Guide for the management of vegetation in the vicinity of electricity assets (Industry Safety Steering Committee [ISSC], 2016, specifications for APZ for substations/switchyards) - Planning for Bushfire Protection (NSW RFS, 2019) specifications for renewable energy generation facilities	OEMP
Aviation Hazard and Plume Rise	AV1	A suitable plume rise symbol will be published on relevant aeronautical navigation charts, to alert pilots to the potential for turbulence in airspace above the Proposal Site.	OEMP
Aviation Hazard and Plume Rise	AV2	The 'Additional information' section in the ERSA Aerodrome pages for Maitland and Cessnock Airports will introduce notes and/or a diagram in respect of potential for turbulence in airspace above the Proposal Site.	OEMP
Aviation Hazard and Plume Rise	AV3	The gas turbine exhaust stack structures will incorporate lighting that is to be activated when the power station is operating	OEMP
Electric and Magnetic Fields	EMF2	The health and safety aspects of potential exposure to EMF at the Proposal Site will be considered for staff and contractors as part of health and safety management practices.	OEMP

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Environmental Aspect	EIS Ref	Mitigation Measure	Relevant Management Plan
Contaminated Land	CLM2	Contamination risks during operation would be managed through the application of relevant standards for the storage and handling of fuels and chemicals and appropriate engineering design	OEMP
Contaminated Land	CLM3	Snowy Hydro's Environmental Management System operational controls and procedures, and the Environmental Standards Handbook and associated training and inductions, will be implemented for all site activities having the potential to release contaminants into the environment	OEMP
Groundwater	GW4	The Operational Environment Management Plan (OEMP) for the Proposal will include preparation and implementation of a Spill Response Plan that addresses storage and handling of fuels, oils and chemicals.	OEMP
Surface Water and Aquatic Ecology	SW3	Site specific controls and procedures will be developed and implemented as part of the Operational Environment Management Plan (OEMP) to minimise the risk to surface and groundwater from stormwater and potentially harmful chemicals. The OEMP will include an emergency spill response procedure, and an uncontrolled water discharge response, monitoring of discharges of oily water separator pit and visual assessment of downstream waterway condition.	OEMP, Water Management Plan
Hydrology and Flooding	HF1	The construction erosion and stormwater management plan will incorporate procedures and schedule for monitoring of the receiving waterway (tributary of Black Waterholes Creek) downstream of the discharge location(s) to identify any evidence of channel erosion and scour	Water Management Plan
Air Quality	AQ3	Gas turbine plants will adopt and utilise the best available/most appropriate technology for controlling emissions, such as Dry Low Emissions (DLE) burners on the gas turbines for use when operating on natural gas fuel, and using Water Injection (WI) control technology in the gas turbine burners when burning diesel fuel.	Air Quality Management Plan
Noise and Vibration	NV3	Noise monitoring of the Proposal post construction will be performed to verify the predicted noise levels at the relevant receivers. These levels will then be used to review and if necessary, improve the equipment and other attenuation requirements and to confirm that the noise attenuation achieves compliance.	Noise Management Plan

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Environmental Aspect	EIS Ref	Mitigation Measure	Relevant Management Plan
Waste Management	W2	An Operational Waste Management Plan (OWMP) will be developed and implemented prior to operational commencement. The OWMP will be implemented with consideration of a hierarchical waste management approach, mitigation strategies (avoidance, mitigation, reuse, recycle or disposal), appropriate segregation of any waste materials and a plan to collect general solid waste and hazardous waste from the Proposal Site.	Waste Management Plan
Waste Management	W3	Any waste that cannot be recovered or recycled will be sorted and taken to a licensed treatment or disposal facility where it will be treated and disposed of according to its classification.	Waste Management Plan
Waste Management	W4	An audit regime will be implemented, in accordance with the Proponent's Health and Safety Environmental Management System during construction and operation which includes (but not limited to) quantities of waste, storage areas and contractor services.	Waste Management Plan