



Snowy Hydro Limited Kurri Kurri Power Station Water Management Plan

Revision No.: 5.2

Revision Date: 11 February 2026

snowyhydro

Acknowledgement of Country

Snowy Hydro acknowledges the traditional custodians of Wonnarua Country, where this 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.

Document Control

Document Details	
Title:	Kurri Kurri Power Power Station Water Management Plan
Revision:	5.2
Date:	11 February 2026
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Company:	Snowy Hydro Limited

Document History Prior to Approval:

Revision	Date	Description	Prepared	Checked	Reviewed	Approved
Final	20 Dec 2021	Final	K Byrnes J Vernon G Sheppard	K Collings A Horan	M Luger	K Ivanusic
Amended Final	28 Jan 2022	Final Amended to address Department's review comments	M Luger	I Smith	M Luger	K Ivanusic
Amended Final	25 Feb 2022	To address ER review	M Luger	I Smith	M Luger	K Ivanusic
5.2	11 Feb	To address DPHI review comments and minor SQE review amendments	T Thompson	M Luger	K Byrnes	K Ivanusic

The initial management plan was prepared by Jacobs and Snowy Hydro, and approved by the Department for the Hunter Power Project, now known as the Kurri Kurri Power Station. Details of the review process are detailed in the document history table above. Subsequent versions of the approved management plan have been updated by Snowy Hydro in consultation with the Department's Environmental Representative as required, and the reasons for the management plan updates are detailed in the table below.

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Approved Management Plan Revision History:

Approved Revision	Revision Date	Description of Changes	Author	Date Approved
01	25 Feb 2022	Previously referred to as Amended Final	M Luger	1 Mar 2022
02	10 May 2023	Document updated in response to approval of Modification 1 on 1 March 2023	R Vazey & A van der Kroft	29 May 2023
03	15 Jan 2024	Document updated in response to approval of Modification 2 on 16 November 2023	A van der Kroft	13 Feb 2024
04	10 Dec 2024	Updated to include commissioning activities	A van der Kroft	18 Dec 2024
05	18 Aug 2025	Formatting and content updated for the KKPS operational stage	T Thompson	23 Sep 2025
5.1	30 Jan 2026	Updated in response to DPHI review of Revision 5	T Thompson	
5.2	11 Feb 2026	Minor amendments following SQE review of Rev 5.1	T Thompson	25 Feb 2026

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1.0 Introduction

This Water Management Plan (Water MP) has been prepared for the Kurri Kurri Power Station (KKPS), formerly known as the Hunter Power Station, as a subplan to the overarching Operations Environmental Management Plan (OEMP) for the facility.

The objective of this Water MP is to provide a point of reference to ensure the effective implementation of KKPS' water related 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);
- The conditions of Environment Protection Licence 21627 (EPL21627);
- The conditions of the Federal EPBC Approval 2021/8888 (EPBC Approval), and;
- Applicable legislation.

This Water MP is a requirement of SSI Approval Condition B40, and has been prepared in consultation with the NSW Environment Protection Authority (NSW EPA), the then Department of Planning Industry and Environment (DPIE) Water, Hunter Water Corporation (Hunter Water), and Cessnock City Council (Council).

Snowy Hydro must prepare the Water MP to the satisfaction of the DPHI Secretary, and as the proponent of KKPS, implement the Water MP.

Previous versions of the Water MP 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 Water MP is for KKPS operations.

The Water MP is applicable to the whole KKPS site and aims to minimise potential water (surface and groundwater) related impacts through:

- Identifying the potential surface water and groundwater related impacts requiring control measures
- Developing strategies to manage surface water and groundwater impacts
- Establishing appropriate monitoring programs and define management measures
- Operating KKPS in compliance with SSI Approval and EPL21627 conditions, as well as relevant legislation relating to surface water and groundwater.

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1.1 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 Water MP and the overarching OEMP are underpinned by, and align with the wider 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.

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.

Further details on the location of KKPS can be found in the KKPS OEMP.

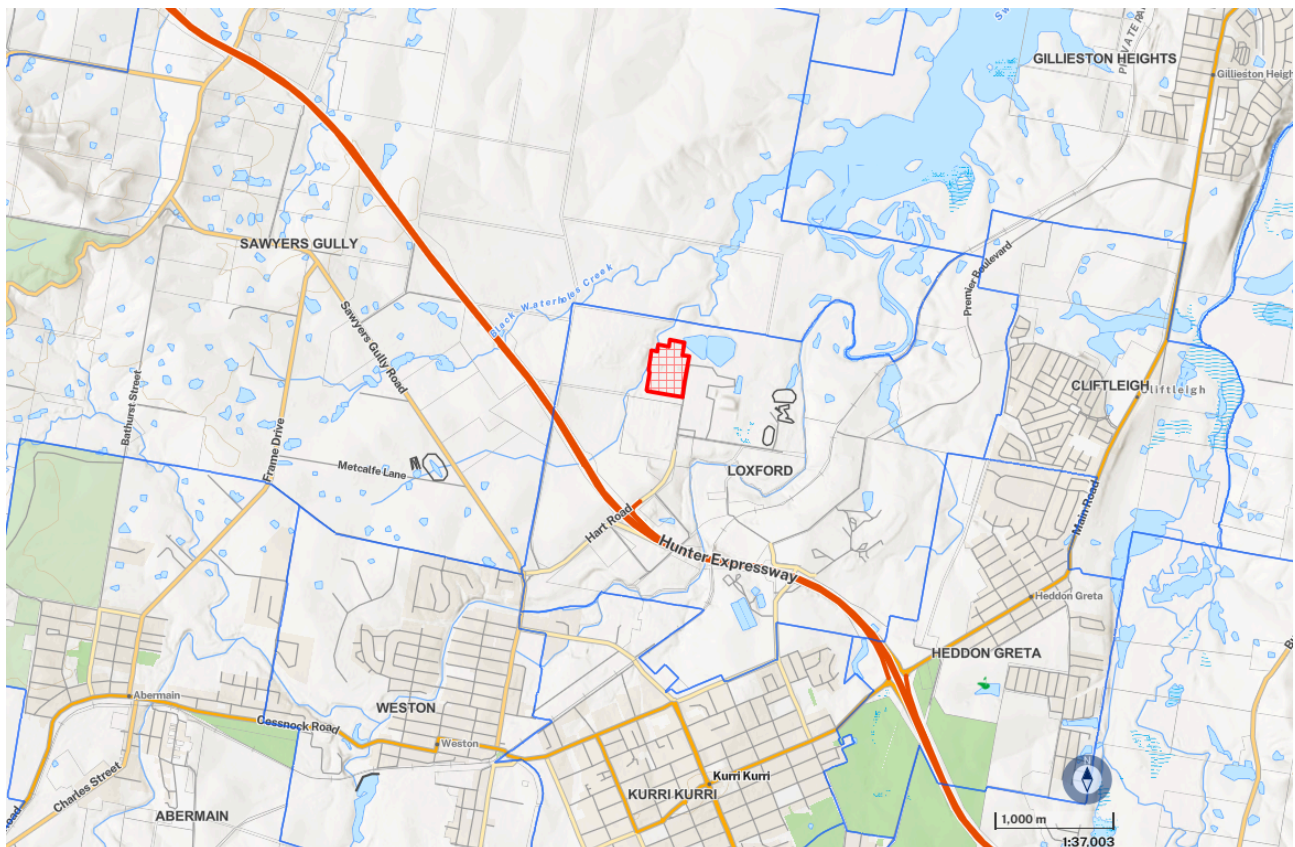


Figure 2.1: Location of the Kurri Kurri Power Station within the regional context (image source: NSW Spatial Services, SDT Explorer)

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

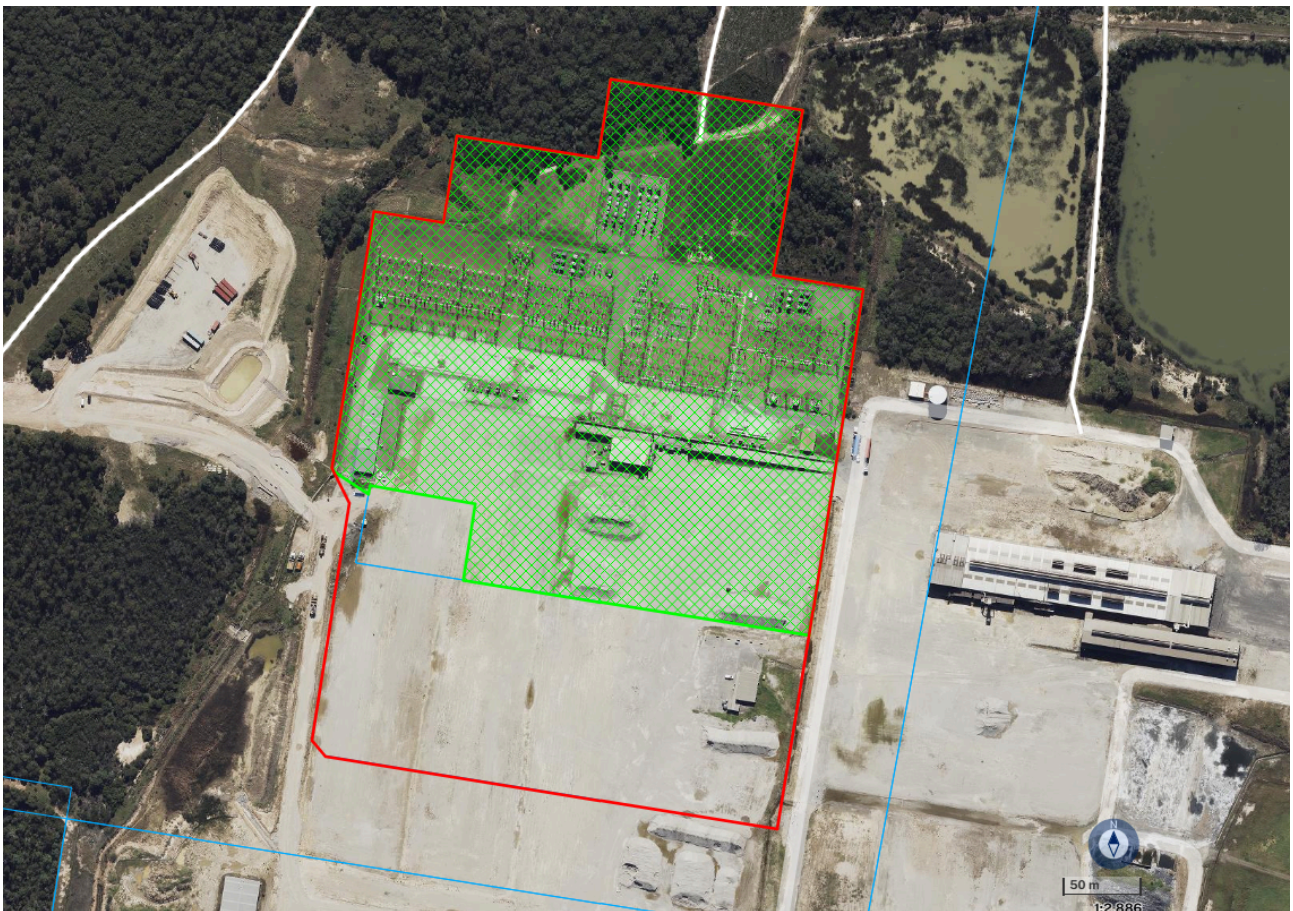


Figure 2.3: Kurri Kurri Power Station boundaries as identified in the SSI and EPBC Approvals (red outline), and EPL21627 (green hatch), (image source: NSW Spatial Services, SDT Explorer)

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2.3 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.

Further details regarding the site operations of KKPS can be found in the KKPS OEMP.

2.4 Key Site Components and Features

Full details of the key site components of KPS are provided in the KKPS OEMP.

An indicative site layout of KKPS is provided below in **Figure 2.4**.

2.5 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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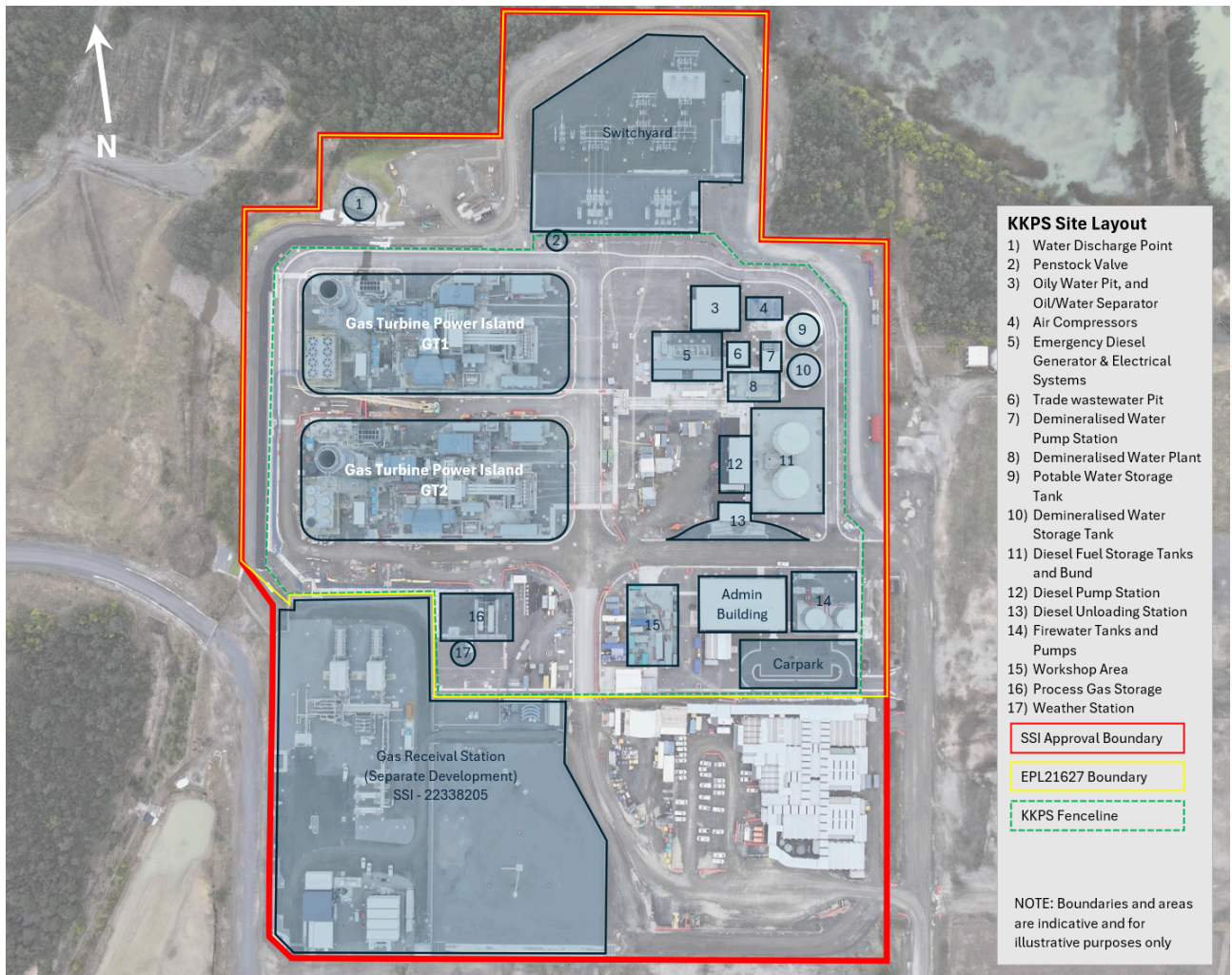


Figure 2.4: Kurri Kurri Power Station Site Layout

3.0 Legislative Compliance

3.1 Applicable Legislation, Standards and Guidelines

This Water MP has been developed in consideration of the following legislation and guidelines:

- *Environmental Planning and Assessment Act 1979 (NSW)*
- *Protection of the Environment Operations Act 1997 (NSW)*
- *Water Management Act 2000 (NSW)*
- *Water Management (General) Regulation 2018*
- NSW Aquifer Interference Policy
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2018 update)
- Australian and New Zealand Guidelines for Water Quality Monitoring and Reporting
- Approved Methods for Sampling and Analysis of Water Pollutants in NSW

Further details on relevant legislation applicable to KKPS can be found in the OEMP.

EPL21627 issued under the POEO Act for KKPS, includes a number of conditions relevant to surface and groundwater management. The POEO Act defines “waters” as the whole or any part of:

- Any river, stream, lake, lagoon, swamp, wetlands, unconfined surface water, natural or artificial watercourse, dam, or tidal waters (including the sea), or
- Any water stored in artificial works, any water in water mains, water pipes or water channels, or any underground or artesian water.

Section 120 of the POEO Act prohibits the pollution of waters. Under the Act, “water pollution”, or “pollution of waters” includes introducing any matter, including, but not limited to, litter, sediment, oil, grease, wash water, debris, and flammable liquids (such as paint) into waters or placing such material where it is likely to be washed or blown into water or the stormwater system, or percolate into groundwater. All practicable steps will be taken to minimise the risk of pollution of waters.

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3.2 SSI Approval Conditions

Water related management requirements for KKPS operations specified by the SSI Approval are provided in **Table 3.1**.

The applicable administrative conditions of the SSI Approval (Conditions A1 to A24), are summarised in **Table 3.1**, as they remain applicable to this management plan. The full detail of the conditions, and where these conditions are addressed is included in the KKPS OEMP.

Table 3.1: Water related approval conditions (KKPS operations)

Condition	Description	Where/how addressed
PART A: ADMINISTRATIVE CONDITIONS		
A1 to A24	• Obligation to minimise harm to the environment (A1) • Terms of Approval (A2 to A5) • Lapse of Approval (A6) • Limits on Approval (A7) • Limits on Operations (A8 to A12) • Statutory Requirements (A13 to A14) • Notification (A15) • Structural Adequacy (A16) • Demolition (A17) • Protection of Public Infrastructure (A18) • Operation of Plant and Equipment (A19) • Environmental Representative (A20 to A24)	KKPS OEMP
PART B: ENVIRONMENTAL CONDITIONS - GENERAL		
WATER AND SOIL		
Water Supply		
B35	The Proponent must ensure it has sufficient water for the development; and if necessary, adjust the scale of development on site to match its available water supply. <i>Note: Under the Water Management Act 2000, the Proponent must obtain the necessary water licences for the development.</i>	Section 6.0
Water Quality		
B36	The Proponent must ensure that all surface discharges from the site comply with all relevant provisions of the POEO Act, including any discharge limits (both volume and quality) set for the development in any EPL.	Section 8.0
B37	All process operational wastewater generated by the activity must: a) be discharged to the sewer network subject to a trade waste agreement with Hunter Water Corporation; or b) captured and stored at the premises and must only be disposed of by tanker transport to a licensed wastewater facility.	Section 7.6

Condition	Description	Where/how addressed
B38	Prior to the commencement of any construction the Proponent must install and maintain suitable sediment and erosion controls onsite, in accordance with the relevant requirements of <i>Managing Urban Stormwater: Soils and Construction – Volume 2A Installation of Services (DECC 2008)</i> .	Section 5.1 and Section 9.0
Water Management Plan		
B40	Prior to the commencement of construction, unless the Secretary agrees otherwise, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must:	This Water MP
B40(a)	be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary	Document History
B40(b)	be prepared in consultation with EPA, DPE Water, Hunter Water Corporation, and Council	Section 3.5
B40(c)	include a	N/A
B40(c)(i)	Site Water Balance that includes details of: a) predicted annual inflows to and outflows from the site; b) sources and security of water supply, including reasonable and feasible measures to minimise potable water demand through detailed design and operations; c) water and wastewater storage capacity; d) water use and management on site including demineralisation water treatment and wastewater transfer; and e) reporting procedure;	Section 6.0
B40(c)(ii)	Surface Water Management Plan that includes: a) baseline data on surface water flows and quality of watercourses and/or water bodies potentially impacted by the development; b) a detailed description of the surface water management system; including - o erosion control measures and pollution control measures which do not require an open basin excavated below the water table where practicable; and - o measures to manage spills, off site flood impacts and stream erosion flows; c) a program to monitor and evaluate: - o disturbance of acid sulphate soils; - o surface water discharges, stormwater and storage volumes; - o rainfall and flooding events; and - o the effectiveness of the surface water management systems to minimise erosion and sediment impacts; d) reporting procedures for the results of the monitoring program; and e) a plan to mitigate any adverse surface water impacts of the development;	Section 4.2 Section 7.0 & Section 9.0 Section 7.0, Section 8.0 & Section 9.0 Section 8.0, & Section 10.1 Section 9.0

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Condition	Description	Where/how addressed
B40(c)(iii)	Groundwater Management Plan that includes: a) detailed baseline data of hydrogeology and groundwater levels and quality of groundwater resources potentially impacted by the development; b) water licencing requirements; c) a detailed description of the groundwater management and monitoring system, including measures to reduce potential for contamination or take of groundwater and estimated groundwater take, if the base of the pollution and surface water management basin is located less than 1 m above the water table; d) a program to monitor and evaluate groundwater flows, groundwater quality and the effectiveness of groundwater management systems, including e) reporting procedures for the results of the monitoring program; f) a plan to respond to any probable or actual exceedances of the groundwater performance criteria and repair, mitigate and/or offset any adverse groundwater impacts of the development.	Section 4.3 Section 5.5 Section 5.5 & Section 8.2 Section 5.5 & Section 8.2 Section 8.2 Section 9.0
B40	The Proponent must implement the approved Water Management Plan	This Plan, Ongoing

PART C: ENVIRONMENTAL MANAGEMENT AND REPORTING

ENVIRONMENTAL MANAGEMENT

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; 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. 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 11.0
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Condition	Description	Where/how addressed
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. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	Section 4.3.2 in the KKPS OEMP
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 10.5.3 Section 4.3.2a in the KKPS OEMP
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 in the KKPS OEMP
C9	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Section 10.5.3 Section 4.3.2a in the KKPS OEMP
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 in the KKPS OEMP
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 in the KKPS OEMP
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 in the KKPS OEMP
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 in the KKPS OEMP

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Condition	Description	Where/how addressed
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.	Section 4.3.3 in the KKPS OEMP
ACCESS TO INFORMATION		
C20	Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: - 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: - the EIS; - all current statutory approvals for the development; - all approved strategies, plans and programs required under the conditions of this approval; - the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; - 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; - 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; - a summary of the current phase and progress of the development; - contact details to enquire about the development or to make a complaint; - a complaints register, updated monthly; - the Annual Reviews of the development; - 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; - any other matter required by the Secretary; and - keep such information up to date, to the satisfaction of the Secretary.	Section 6.1 in the KKPS OEMP

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Condition	Description	Where/how addressed
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 11.0
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: • <i>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.</i> • <i>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.</i>	Section 11.0

3.3 EPL21627 Conditions

Water management requirements specified by the SSI Approval are provided in **Table 3.2**.

Table 3.2: Water related EPL conditions

Condition	Description	Where/how addressed												
P1 Location of monitoring/discharge points and areas														
P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <table><tr><th colspan="4">Water and land</th></tr><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>3</td><td>Discharge quality monitoring</td><td></td><td>Outlet of stormwater system marked and shown as "Point 1" on plan titled "Hunter Power Project EPL 21627 Premises Plan, Revision F" dated 07/05/2025 (EPA reference DOC25/378484).</td></tr></table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	3	Discharge quality monitoring		Outlet of stormwater system marked and shown as "Point 1" on plan titled "Hunter Power Project EPL 21627 Premises Plan, Revision F" dated 07/05/2025 (EPA reference DOC25/378484).	Section 8.0
Water and land														
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description											
3	Discharge quality monitoring		Outlet of stormwater system marked and shown as "Point 1" on plan titled "Hunter Power Project EPL 21627 Premises Plan, Revision F" dated 07/05/2025 (EPA reference DOC25/378484).											
L1 Pollution of Waters														
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997	Section 3.1 & Section 8.0												
O1 Activities must be carried out in a competent manner														
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Section 9.0												
O2 Maintenance of plant and equipment														
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner	Section 9.0												
M2 Requirement to monitor concentration of pollutants discharged														

Condition	Description	Where/how addressed																								
M2.5	Water and/ or Land Monitoring Requirements POINT 3 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Monthly during discharge</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Monthly during discharge</td><td>Grab sample</td></tr><tr><td>Total solids</td><td>milligrams per litre</td><td>Monthly during discharge</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Monthly during discharge</td><td>Grab sample</td></tr><tr><td>Turbidity</td><td>nephelometric turbidity units</td><td>Monthly during discharge</td><td>Grab sample</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Oil and Grease	milligrams per litre	Monthly during discharge	Grab sample	pH	pH	Monthly during discharge	Grab sample	Total solids	milligrams per litre	Monthly during discharge	Grab sample	Total suspended solids	milligrams per litre	Monthly during discharge	Grab sample	Turbidity	nephelometric turbidity units	Monthly during discharge	Grab sample	Section 8.0
Pollutant	Units of measure	Frequency	Sampling Method																							
Oil and Grease	milligrams per litre	Monthly during discharge	Grab sample																							
pH	pH	Monthly during discharge	Grab sample																							
Total solids	milligrams per litre	Monthly during discharge	Grab sample																							
Total suspended solids	milligrams per litre	Monthly during discharge	Grab sample																							
Turbidity	nephelometric turbidity units	Monthly during discharge	Grab sample																							

3.4 EIS Commitments

Table 3.3 specifies the operational related commitments for KKPS in relation to surface water and groundwater management

Table 3.3: Water related EIS Commitments/mitigation measures

Reference	Description	Where/how addressed
EIS Section 12.4 & 22	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.	KKPS OEMP
EIS Section 13.4 & 22	SW03 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	KKPS OEMP, Section 7.0, Section 8.0, Section 9.0
Surface Water Quality and Aquatic Ecology Impact Assessment Section 7.1	SW06:Site specific controls and procedures would be developed and implemented as part of the Operational Environment Management Plan (OEMP) to reduce the risk of litter off-site and spills and leaks entering downstream waterways. The OEMP will include (but not be limited to) the following measures: • An emergency spill response procedure • Bunding requirements (already part of the Proposal design) for process areas in accordance with AS1940 • A surface water monitoring program including regular visual water quality checks (for hydrocarbon spills/slicks, and other water quality parameters) will be carried out at waterways in proximity to the Proposal Site (refer to Section 7.2 for further detail).	KKPS OEMP,

Reference	Description	Where/how addressed
Surface Water Quality and Aquatic Ecology Impact Assessment Section 7.2	Recommended surface water quality monitoring 7.2.2 Operational monitoring An operational monitoring program will be developed and included in the OEMP for implementation following completion of construction to observe any changes in surface water from operation of the Proposal and inform appropriate management responses The monitoring program will include: • In the event of any uncontrolled surface water discharge from the Proposal Site, should there be concerns in relation to water quality, a monitoring process would be implemented • Six monthly monitoring of discharge from the oily water separator pit for physical parameters and oil and greases • Visual assessment of downstream waterway condition including the tributary to Black Waterholes Creek and Black Waterholes Creek	Section 8.0

3.5 Consultation

The SSI Approval required the Water MP to be prepared in consultation with the NSW Environment Protection Authority (NSW EPA), The Department of Planning Industry and Environment (DPIE) Water (now NSW Department of Climate Change, Energy, the Environment and Water - DCCEEW), Hunter Water Corporation, and Cessnock City Council. **Table 3.4** outlines the consultation and outcomes for the construction and commissioning stage Water MP, and the outcomes of that consultation. Table 3.5 outlines the consultation and outcomes for the operational stage Water MP.

Table 3.4: Consultation summary for the construction and commissioning stage Water MP

Agency	Feedback	Response
NSW EPA	EPA responded they “encourage the development of [management plans] to ensure that proponents and licensees have determined how they will meet their statutory obligations and designed environmental objectives. Being a regulatory authority, the EPA’s role is to administer and regulate the statutes for environmental management and protection. As such the EPA does not directly get involved in the development of strategies to achieve those objectives and does not review or comment on such plans.”	Noted.
DPIE Water	DPIE consulted with the hydrogeologists within the Department and “are experiencing an exceptionally high demand for assessment of pre-approval and post approval state significant development projects. Due to the high number of pending requests the department will not be commenting on preliminary draft WMP documents and will provide formal advice on the final document submitted for determination”.	Noted.
Cessnock City Council	Council consulted with the Council’s development engineers and replied they have “no comments on the plans (Transport and Water)”.	Noted.
Hunter Water Corporation	Snowy Hydro has been consulting with Hunter Water throughout the year with respect to the potable water, sewer, trade waste requirements and associated connections for the Hunter Power Project. This has informed the operational water strategy and water management for the project. The development of water and sewer connection requirements has been in the context of the Interim Servicing Strategy from the industrial precinct developer ‘Regrowth’, and the overall Precinct Strategy. The interim strategy to be in place while the power station is operating and before the majority of the precinct is developed. Consequently, the consultation with Hunter Water is often also with Regrowth in order to coordinate each parties requirements. Additionally, Snowy Hydro, Regrowth and Hunter Water have been meeting frequently to discuss the Service Strategy for operations and for water during construction. Hunter Water Corporation provided their Preliminary Service Advice on 25 February 2021, following provision by Jacobs, on behalf of Snowy Hydro, of a site water balance and instantaneous potable water demand required by the power station. Subsequent consultation and meetings have been held through October and November with Hunter Water. Issues addressed have included review of trade waste characteristics and criteria for the project, the nature of sewer main extensions for construction office space as well as permanent power station offices, hydraulic assessments and sewer main capability. Throughout November and December, the Interim Servicing Strategy has been revised to incorporate various infrastructure required for both pumped and gravity sewer systems. This revised strategy was submitted to the Major Developments division, along with a connection application to reconnect the administration building which will be occupied by Snowy Hydro. Snowy Hydro has also been in detailed discussions most recently with the Hunter Water Technical Services Division to develop a hydraulic assessment for the precinct in which the project site is located. The consultation has focused on how to utilise existing infrastructure to	Noted.

	sustainably provide the construction site with potable water during mobilisation and throughout the project. The process of connecting to the network is managed by Hunter Water and will involve the engagement of an accredited plumbing and earthworks contractor to facilitate this scope of work. Snowy Hydro has engaged the designer AECOM for the water and sewer connection design work, who have applied for and been accredited by Hunter Water. The formal aspect of the consultation process is the lodging of connection applications and connection designs by Snowy Hydro to Hunter Water for approval.	
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Table 3.5: Consultation summary for the operational stage Water MP

Agency (date consulted)	Feedback	Response
NSW EPA (29 Sept 2025)	14 Oct 2025: I would like to acknowledge receipt of the Air Quality Management Plan, the Noise Management Plan, and the Waste Management Plan for Hunter Power Station (the Plans). The EPA has not reviewed and has no comments on the Plans. The EPA encourage the development of management plans to ensure that licensees have determined how they will meet their statutory obligations and designed environmental objectives. The EPA's role, as a regulatory authority, is to set environment objectives rather than being involved in the development of strategies to achieve those objectives. As such the EPA does not directly get involved in the development of strategies to achieve those objectives and does not review or comment on such plans.	Noted
NSW DCCEEW (29 Sept 2025)	3 Oct 2025: We have no comments to provide, you may consider your consultation with us complete	Noted
Hunter Water Corporation (29 Sept 2025)	28 Nov 2025: I refer to your request via email on 29 September 2025 requesting Hunter Water to provide advice on the Water management Plan (WMP) for the Kurri Kurri Power Station (KKPS). Hunter Water acknowledges that Snowy Hydro are required to consult with Hunter Water regarding SSI Approval Condition B40 requiring the preparation and regular review of the WMP as a subplan to the overarching Operations Environmental Management Plan for the KKPS. Snowy Hydro submitted a Development Application to Hunter Water for the KKPS on the 16 June 2024 and subsequently Hunter Water issued a Compliance Certificate under Section 50 of the Hunter Water Act 1991 for the development on 18 November 2024. The KKPS is located within the Regrowth Kurri Industrial Area (RKIA) with the servicing needs assessed in the Water and Wastewater Connection Report (Rev B; dated 27 May 2022). The KKPS connected to Hunter Water's water and wastewater networks in accordance with the Water-Wastewater Design and Hydraulic Report (Rev B; dated 18 October 2023). Hunter Water advises that this is an interim connection arrangement until the RKIA is fully serviced at which time the KKPS	Noted

	will need to reconnect the facility in accordance with Hunter Water's Notice letter dated 10 November 2022 (attached). As indicated in the Notice letter, the interim connection to Hunter Water's water supply network does not provide security of supply and Snowy Hydro needed to design and construct the internal private water supply system to provide an alternative water supply in the event of a supply failure. Also, Hunter Water's watermain may not provide fire fighting coverage for the facility and KKPS needed to design and construct an internal firefighting system to provide firefighting capability within the development site. The trade waste for this site is managed under the current trade waste deed, with Hunter Water undertaking three inspections per year and collecting three trade waste discharge samples annually. These activities form part of Hunter Water's compliance program and meet the requirements outlined in the Trade Waste Deed, as well as Hunter Water's Trade Waste Standards and Policy.	
Cessnock City Council (29 Sept 2025)	14 October 2025: We wish to advise that Council has no further comments on the EMPs and supports their implementation as drafted.	Noted

4.0 Existing Environment

4.1 Soils and Geology

A geotechnical review and intrusive investigation indicated deep alluvial soils across the KKPS site prior to construction, with siltstone bedrock at approximately 14 m to 18 m depth. Laboratory testing undertaken on near surface soils indicated that they were sodic and hence have the potential to be dispersive in nature.

Acid Sulfate Soils are unlikely across KKPS according to the Acid Sulfate Soil Risk mapping dataset (NSW DCCEEW). However, laboratory testing results from preliminary geotechnical investigations indicate localised areas within the alluvial soils mainly at depth were noted as acid sulfate soils. In the event of ground disturbance activities, acid sulfate soils will be appropriately considered as appropriate.

4.2 Surface Waters

4.2.1 Existing Water Features

The Project Site is located in proximity to two waterways:

- An unnamed tributary of Black Waterholes Creek, which is an ephemeral waterway that flows generally south west to north east immediately adjacent to the western boundary of KKPS.
- Black Waterholes Creek, which is a perennial waterway located downstream of the unnamed tributary, and subsequently flows into Swamp Creek about 1.5 km downstream.
- Swamp Creek, which drains to the north to Swamp Creek wetlands, then into the Wentworth Swamps which are part of the Hunter River floodplain.

Both Black Waterholes Creek and its unnamed tributary eventually converge to Swamp Creek which continues flowing north and drains a large network of low lying, floodplain environments known as Wentworth Swamp. Swamp Creek ultimately flows into Wallis Creek about 10 kilometres (km) downstream of KKPS, with Wallis Creek joining the Hunter River a further 7km downstream.

Other important water features within proximity of KKPS are two large artificial stormwater retention ponds referred to as the North Dam (both approximately one metre deep) associated with the stormwater management system of the former Kurri Kurri aluminium smelter. Hydro Aluminium is licenced (under EPL1548) to discharge to an irrigation area on an adjacent vegetated property north of the ponds. The ponds currently have a combined capacity of approximately 130,000 kilolitres.

Figure 4.1 provides an overview of the described water features and their proximity to KKPS.

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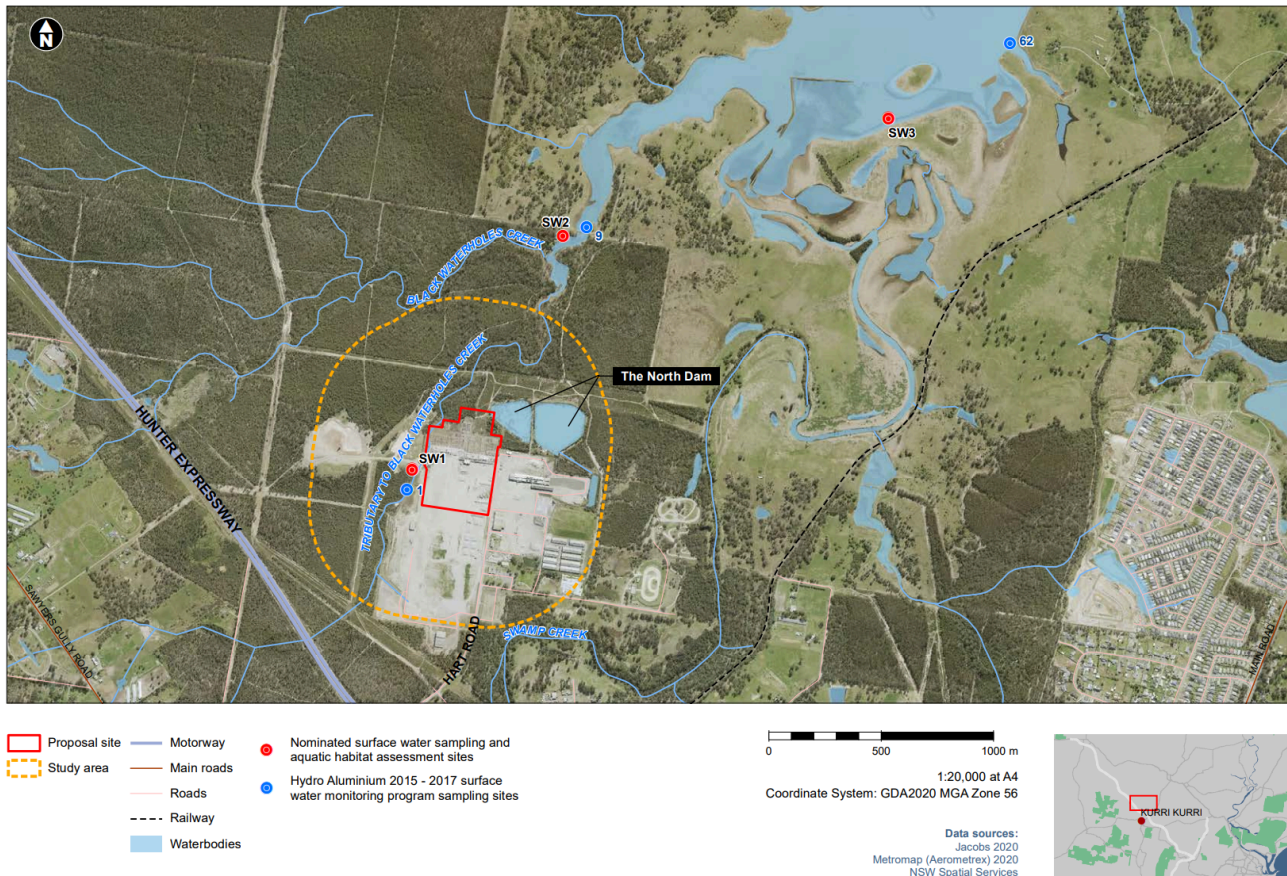


Figure 4.1: Surface water features in proximity to Kurri Kurri Power Station, and baseline water quality sample locations

4.2.2 Baseline Surface Water Quality

Existing baseline water quality data for waterways in proximity of KKPS is limited to three years of monthly monitoring data collected by Hydro Aluminium between 2015 and 2017, and additional grab samples collected in November 2020. It should be noted that the grab sample data is solely reflective of water quality at the time of collection and should not be interpreted as long-term water quality trends. **Table 4.1** below provides the results of water quality samples collected pre-KKPS and compares this to the Australian & New Zealand Water Quality Guideline default guideline values (DGV) for the 95% species protection for slightly to moderately disturbed lowland rivers (unless otherwise specified). Results not within the specified DGV's are indicated with **bold** text.

Table 4.1: Baseline median water quality of surface waters in proximity to KKPS

Parameter	Unit	DGV	Tributary of Black Waterholes Creek		Black Waterholes Creek		Swamp Creek	
			Site 1 ¹	SW1 ²	Site 9 ¹	SW2 ²	Site 62 ¹	SW3 ²
pH	pH units	6.5-8.5	7.4	6.7	6.7	5.9	7.6	6.7
Turbidity	NTU	6-50	–	18.0	–	38.6	–	370
Dissolved Oxygen	%	85-110	–	76.9	–	37.6	–	79.4
Electrical Conductivity	uS/cm	125-2200	1600	790	1500	1313	1250	858
Total Nitrogen	mg/L	0.35	–	1.3	–	2.4	–	2.4
Total Phosphorus	mg/L	0.025	–	0.20	–	0.28	–	0.49
Filterable Reactive Phosphorus	mg/L	0.02	–	0.06	–	<0.01	–	<0.01
Calcium	mg/L	1000 ³	–	16	–	10	–	19
Fluoride	mg/L	1.5 ⁴	4.2	1.7	1.9	2.1	0.85	0.80
Chloride	mg/L	250 ⁴	–	191	–	422	–	148
Aluminium	mg/L	0.055	–	0.001	–	0.34	–	0.27
Arsenic	mg/L	0.024	–	<0.0001	–	<0.0001	–	<0.0001
Boron	mg/L	0.94	–	<0.05	–	<0.05	–	<0.05
Cadmium	mg/L	0.0002	–	<0.001	–	<0.001	–	<0.001
Chromium	mg/L	0.001	–	<0.001	–	<0.001	–	<0.001
Copper	mg/L	0.0014	–	<0.001	–	<0.001	–	<0.001
Lead	mg/L	0.0034	–	0.004	–	<0.001	–	<0.001
Mercury	mg/L	0.00006	–	<0.0001	–	<0.0001	–	<0.0001
Nickel	mg/L	0.011	–	0.008	–	0.009	–	0.009
Zinc	mg/L	0.008	–	<0.005	–	0.01	–	<0.005
Free Cyanide	mg/L	0.007	–	<0.004	–	<0.004	<0.005	<0.004

Table 4.1 Notes

1: Sample sites from the Hydro Aluminium surface water monitoring program (2015 – 2017).

2: EIS grab sample sites collected by Jacobs in November 2020.

3: DGV for primary industry (livestock drinking water) (ANZECC/ARMCANZ, 2000)

4: DGVs for recreational water quality (NMHRC, 2008)

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4.3 Groundwater

The dominant groundwater flow direction in proximity to KKPS is generally inferred to be to the north and north-east toward sensitive receptors such as Black Waterholes Creek and Wentworth Swamp. Within and immediately adjacent to KKPS, groundwater flow is inferred to be predominantly west-north-west toward the unnamed tributary of Black Waterholes Creek along the western and northern boundary.

The water table aquifer is hosted in the alluvium and is unconfined. The alluvial aquifer is considered to be connected to surface water features such as Swamp Creek and Black Waterholes Creek that lead to the Wentworth Swamp wetlands based on the direction of groundwater flow and the groundwater depth. The local drainage lines are considered to provide a control on groundwater levels and as such are likely a point of ephemeral groundwater discharge or evapotranspiration.

The depth to groundwater is inferred to be approximately 12mAHD (approx 1.2m below ground level) at the eastern boundary of KKPS, and approximately 9mAHD (approx 4.0m below ground level) at the western boundary of KKPS.

Figure 4.2 provides an indication of the groundwater flows in proximity to KKPS and locations of existing groundwater monitoring locations

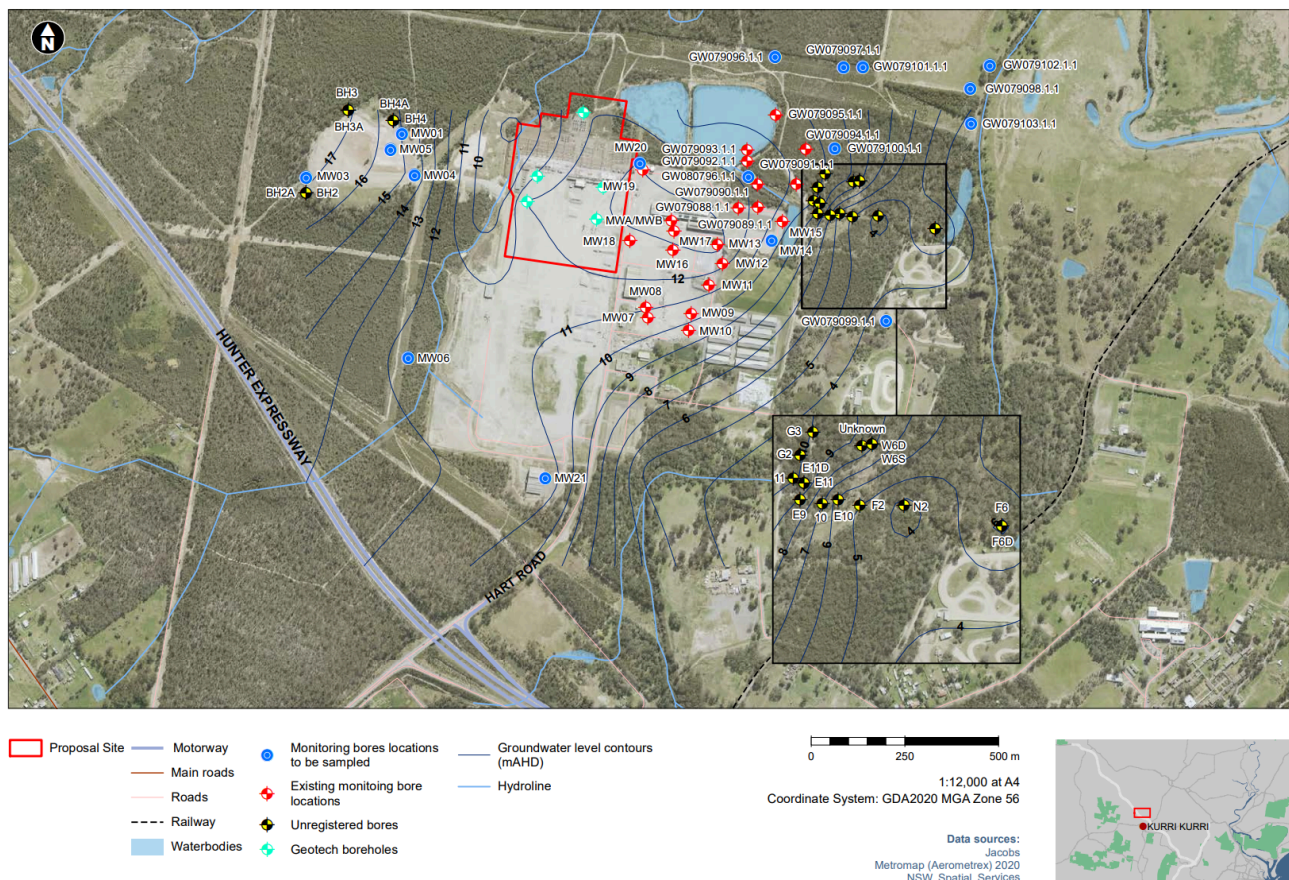


Figure 4.2: Indicative groundwater contours and monitoring well locations in proximity to KKPS

4.3.1 Baseline Groundwater Quality

Previous industrial activities at the former Kurri Kurri aluminium smelter site have impacted groundwater quality, primarily via the stormwater ponds and waste storage areas, which are adjacent to KKPS.

Basic groundwater quality (major anions, pH, Electrical Conductivity) were analysed from samples collected at five selected monitoring bore locations (MW06, MW13, MW20, MW21, GW079099) around the KKPS site in November 2020. A summary of water quality parameters is provided in **Table 4.2**. It should be noted that the sample data is solely reflective of groundwater quality at the time of collection and should not be interpreted as a long-term water quality trend.

Table 4.2: Baseline groundwater quality in proximity to KKPS

Parameter	Unit	MW21	MW6	MW13	MW20	GW079099
pH	pH Unit	7.08	6.65	4.84	6.76	5.65
Electrical Conductivity	uS/cm	19900	20700	1610	–	14100
Total Alkalinity	mg/L	<934	294	24	–	87
Sulfate as SO ₄	mg/L	1800	797	337	96	2240
Chloride	mg/L	5270	6420	280	10	3550
Calcium	mg/L	133	66	<1	1	76
Magnesium	mg/L	527	478	24	7	406
Sodium	mg/L	3360	3460	265	321	2130
Potassium	mg/L	37	7	3	1	32

5.0 Operational Impacts

The KKPS site incorporates a stormwater drainage system that has been designed to minimise the release of potential pollutants (generally oil and sediments) to the environment via a licenced discharge point at the northwest corner of the site.

Operational impacts to surface water and groundwater during KKPS operations are primarily associated with uncontrolled release of process water or contaminated stormwater, potential spills or leaks. Potential impacts to water quality during operation and the risk of their occurrence are described in the sections below

5.1 Erosion and Sedimentation

Following the completion of KKPS construction activities, the ongoing potential for impacts to water quality due to soil erosion and subsequent transport of sediment to downstream receiving waterways is significantly mitigated with previously exposed surfaces sealed or landscaped.

5.2 Surface Water Discharges

KKPS operations may present a potential risk to downstream water quality if process wastewater or contaminated stormwater is discharged into the stormwater drainage system without treatment. However the design of the KKPS drainage systems allows for the separation and diversion of process wastewaters, and other surface water runoff. Refer to **Section 7.0** for details.

As such, the risk of water quality impacts from KKPS as a result of stormwater discharge during operation is considered low and unlikely to cause a major or long-term impact on water quality of downstream receiving environments.

5.3 Spills and Leaks

Spills or leaks may occur during KKPS operations as a consequence of plant or equipment malfunction, maintenance or refuelling. Accidental spills may also occur as a result of inappropriate storage, handling and use of plant and equipment (including vehicles on-site).

While there is potential for spills and leaks, the design of KKPS allows for the capture and treatment of runoff from any process areas where contamination could be expected.

In the unlikely event of a spill that may discharge from site via the stormwater (clean water) system, the penstock valve can be closed either remotely or locally, which prevents any discharge waters leaving site.

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5.4 Performance against NSW Water Quality Objectives

With the implementation of permanent water quality controls and management measures, site discharges to the tributary of Black Waterholes Creek (and subsequently Black Waterholes Creek and Swamp Creek) during KKPS operations would be of a quality that would maintain or improve the pre-KKPS water quality of the receiving aquatic environment. Therefore KKPS operations are not expected to impact on achieving the environmental values of protection of aquatic ecosystems or visual amenity.

KKPS operations are also not expected to impact on achieving the environmental values of primary or secondary contact recreation, as the key indicators of concern relevant are pathogens, algae and toxicants. Bacteriological indicators are not a source of pollutants from KKPS operations, and increased algae is not likely, due to a reduction of sediment laden runoff, and therefore a reduction in nutrients. This reduction in sediment laden runoff will also reduce the level of toxicants entering downstream waterways which could have posed a risk to human health and aquatic species.

The default guideline values for indicators relevant to the environmental values of irrigation water supply and homestead water supply are less stringent than those which have been outlined for the protection of aquatic ecosystems and recreational water use. Therefore, by meeting the water quality objectives for protection of aquatic ecosystems, primary contact recreation and secondary contact recreation, the objectives of irrigation water supply and homestead water supply will also be achieved. As such, KKPS operations are not expected to impact on achieving the environmental values of irrigation water supply and homestead water supply.

5.5 Groundwater

Following completion of construction of KKPS, the increased area of impervious surfaces across the KKPS site may potentially decrease the amount of natural local groundwater recharge. However, due to the existing clay soil types underlying the KKPS area, such impacts are expected to be insignificant.

During KKPS operations, no groundwater dewatering activities will be required, therefore there will be no requirement for a Water Access Licence or Water Use Approval.

Groundwater contamination may arise from spills and leaks during the operational phase. These may occur via the storage and handling of fuels, oils and chemicals, leaks of oil or fuel from operational equipment or refuelling activities. The design of KKPS allows for the capture and treatment of runoff from any process areas where contamination could be expected, therefore groundwater impacts from spills and leaks are effectively eliminated.

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6.0 Operational Site Water Balance

Key water demands during KKPS operations include:

- Input to the demineralised water treatment plant for the production of demineralised water for wet compression/fogging and NO_x emission control when operating on diesel fuel.
- Inlet air/evaporative cooling for the gas turbines.
- Supply to workshops, amenities and administration buildings, including kitchens, safety showers, eyewash facilities, etc.
- Make-up supply for the firefighting and emergency facilities.
- Plant wash down.

Operational water demand varies depending on the type of fuel used, with natural gas generation having a significantly lower water consumption, compared to generation using diesel fuel. Significant variation in annual water usage is also dependent on the ambient temperature and the utilisation rate of evaporative coolers and wet compression fogging.

Indicative water demands for KKPS are summarised in **Table 6.1** and **Table 6.2** below, with a 1,720kL Service (Potable) Water Tank, and a 1,720kL Demineralised Water Storage Tank providing a buffer for the instantaneous nature of water demand during operations.

The potable water demand for KKPS during generation is expected to be up to 133 kilolitres per hour (kL/h). This does not correspond to the instantaneous water demand on the Hunter Water supply due to the potable and demineralised water tanks on site to minimise the instantaneous demand.

Nitrous oxide (NO_x) emission control inflates the demand for demineralised water when a dual-fuel turbine operates on diesel fuel. Demineralised water is produced on site via a demineralisation water plant which is fed from the potable water supply.

The indicative total annual water demand for KKPS during operations is approximately 80 megalitres (ML) based on the maximum approved operating hours, being 1,100 hours per year, which includes up to 175 hours operating on diesel fuel (Approx 12.5% total capacity factor, including 2% capacity factor for diesel operations). Actual operating hours and therefore water demand is expected to be significantly less.

The indicative total annual wastewater volume for KKPS during operations is approximately 16.2 ML, based on the maximum approved operating hours, being 1,100 hours per year, which includes up to 175 hours operating on diesel fuel (Approx 12.5% total capacity factor, including 2% capacity factor for diesel operations). With an expected capacity factor of approximately 2%, the annual wastewater volumes indicated would result in considerably less water demand and wastewater disposal volumes.

As KKPS commences operation, water consumption and demand shall be monitored to enable a more representative site water balance based on actual consumption over a representative annual period. Updates to the site water balance following the commencement of operations will be included in this Water MP.

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All operational water demands for KKPS during operations are met via a site connection to the Hunter Water supply network.

Table 6.1: Estimated water demand for KKPS when operating on natural gas

Component	Water Demand (kL/h)
Total Potable Water Consumption	133.1
Domestic Use	0.075
Evaporative Cooler Make-up	67.7
Demineralised Water Plant Supply	65.3
Demineralised Water Consumption	64.8
Wet Compression/fogging	57.6
NOx emission control	0.0
Compressor washing	7.2

Table 6.2: Estimated water demand for KKPS when operating on diesel

Component	Water Demand (kL/h)
Total Potable Water Consumption	133.1
Domestic Use	0.075
Evaporative Cooler Make-up	67.7
Demineralised Water Plant Supply	65.3
Demineralised Water Consumption	151.2
Wet Compression/fogging	0.0
NOx emission control	144.0
Compressor washing	7.2

7.0 Site Water Management Features

7.1 Stormwater Drainage System

The KKPS site drainage system (storm water) consists of a series of underground drainage systems that all drain to the offsite discharge point at the north western boundary of the power station (also see **Section 8.1.1**). The main storm water drainage network catches run off from along the road ways, the administration building, workshop and the overflow of the oily water pit. **Figure 7.1** illustrates the stormwater drainage network across KKPS.

The stormwater drainage network is sized for a 1 in 20-year (5% AEP) event to avoid overland flow, while flow depths in overland paths are designed for a 1 in 100-year (1% AEP) event to prevent inundation of plant equipment and doorways, ensuring roads remain trafficable.

Although utilised during the construction period, an open sediment basin incorporated into the stormwater drainage system, located at the northern end of KKPS has been decommissioned and rehabilitated. The operational stormwater drainage system does not consist of an open sediment basin.

Stormwater drains across KKPS are identifiable with blue demarcation.

7.2 Penstock Valve and Humeceptor

The penstock valve is a valve installed on the outflow of the stormwater discharge drain that can be used to stop any runoff from leaving the site. The valve is situated on the northern boundary of KKPS and is operated manually, either locally at the valve, or remotely via the site control system (DCS).

Downstream of the penstock valve is the humeceptor. The HumeCeptor® system is an underground, precast concrete stormwater treatment solution that utilises hydrodynamic and gravitational separation to efficiently remove total suspended solids and entrained hydrocarbons from runoff.

7.3 Ausgrid Switchyard Drainage

The Ausgrid switchyard (adjacent to the northern boundary of KKPS) has a surface water drain in the south western corner which is connected to the KKPS stormwater drainage system. It connects into the stormwater drain downstream of the humeceptor just before the stormwater outlet, which is the KKPS licenced discharge point.

7.4 Process (Oily) Water System

The oily water system is a network of underground pipes and drains which direct any spillage from areas of site that may contain pollutants to the oily water pit. These areas include transformer bunds, diesel bunds, diesel pump skid bunds, overflow from trade waste pit, and piping and cable ways. Rain

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water will be the significant majority of the flow from these areas, however in the event of a fault or spillage, pollutants will be contained.

Figure 7.2 illustrates the stormwater drainage network across KKPS.

The process (oily) water drains are segregated from the stormwater (clean water) drainage system, with drains and pit lid covers demarcated in orange.

The oily water pit is a large capacity pit which is covered and fenced. The main operating area of the pit is only a small section in the south eastern corner of the structure, which is monitored by a level switch and pumped out to the oily water separator when the level is high.

There is an overflow to the stormwater system also in the north western corner of the pit.

Available storage capacities of the process (oily) water system to contain potential leaks/spills are:

- Oily Water Pit: 661 kL
- Storage capacity upstream of oily water pit: 85 kL
- Storage capacity between the oily water pit and the penstock valve: 1,362 kL.
- Total oily water storage capacity: 2,108 kL

This combined volume far exceeds the maximum theoretical spill volume in the event of a large oil leak/firefighting event:

- The volume of onsite fire water: 1100kL
- The largest transformer oil volume (Generator step-up transformer): 73 kL.
- Maximum theoretical spill volume: 1,173kL

7.5 Oily Water Separator

The oily water separator is an automated system that separates oil from water. Its operation is triggered by a level switch in the main operating section of the oily water pit. There is a skimmer in the pit which spins once the pump starts and skims the top of the water into the hose and is pumped into the separator skid.

The collected water/oil goes through a filter before going through a first stage cyclone. With the fluid being pumped at pressure, the solids/oily water flow out one end of the cyclone and the reclaimed fluid flows out the other. The first stage cyclone solids/oily water feeds the second stage cyclone where it is processed again. The reclaimed/treated water flows to the storm water system and the solids/oily water is directed to the decant tank for storage before being tankered from site.

7.6 Trade Wastewater System

The trade waste pit is another collection and discharge point off site for waste water. This system has drainage and connection points on each GT power island, the demineralised water plant, demineralised water pump bund, and demineralised water tank drainage point. The wastewaters draining to the trade waste pit include:

- GT Compressor Washwaters
- GT Evaporative Cooler Water Blowdown
- Demineralised Water Plant Wastewaters
- Oily wastewaters
- Runoff from chemical bund drains

The trade waste pit is monitored by pH sensors that monitor for a pH range of 6.5-10. Anything outside these limits, the pumps recirculate until the solution is within specification.

Trade wastewater is discharged to the Hunter Water wastewater network under approval from a Trade Waste Deed with Hunter Water. Refer to **Section 8.3** for further details.

The trade waste pump out maximum rate is 31 m³/h.

The trade waste pump station includes an emergency storage volume of 64 m³ (plus the volume of the gravity system to the overflow level). In the event that the trade waste pump station is rendered inoperable, or receives inflows that exceed design capacity for an extended period, the system will overflow into the oily water separator.

Figure 7.3 provides an overview of the KKPS trade waste drainage network

7.7 Domestic Wastewater

The KKPS domestic wastewater system serves the workshop and administration buildings. The effluent drains to the south-east corner of the site to a small sewage pump station, then to the existing Hunter Water wastewater system.

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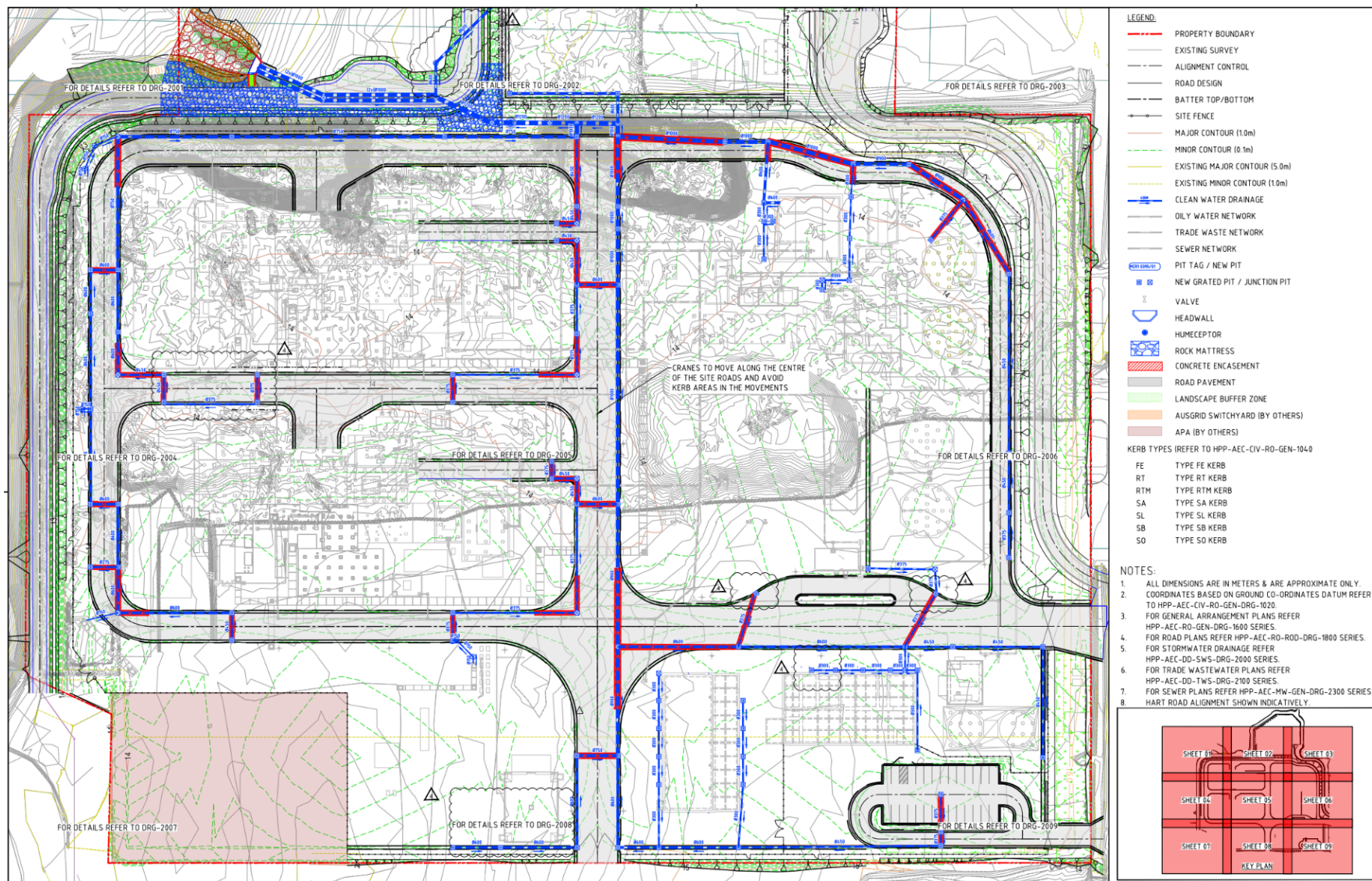


Figure 7.1: Indicative layout of the KKPS stormwater (clean water) drainage system

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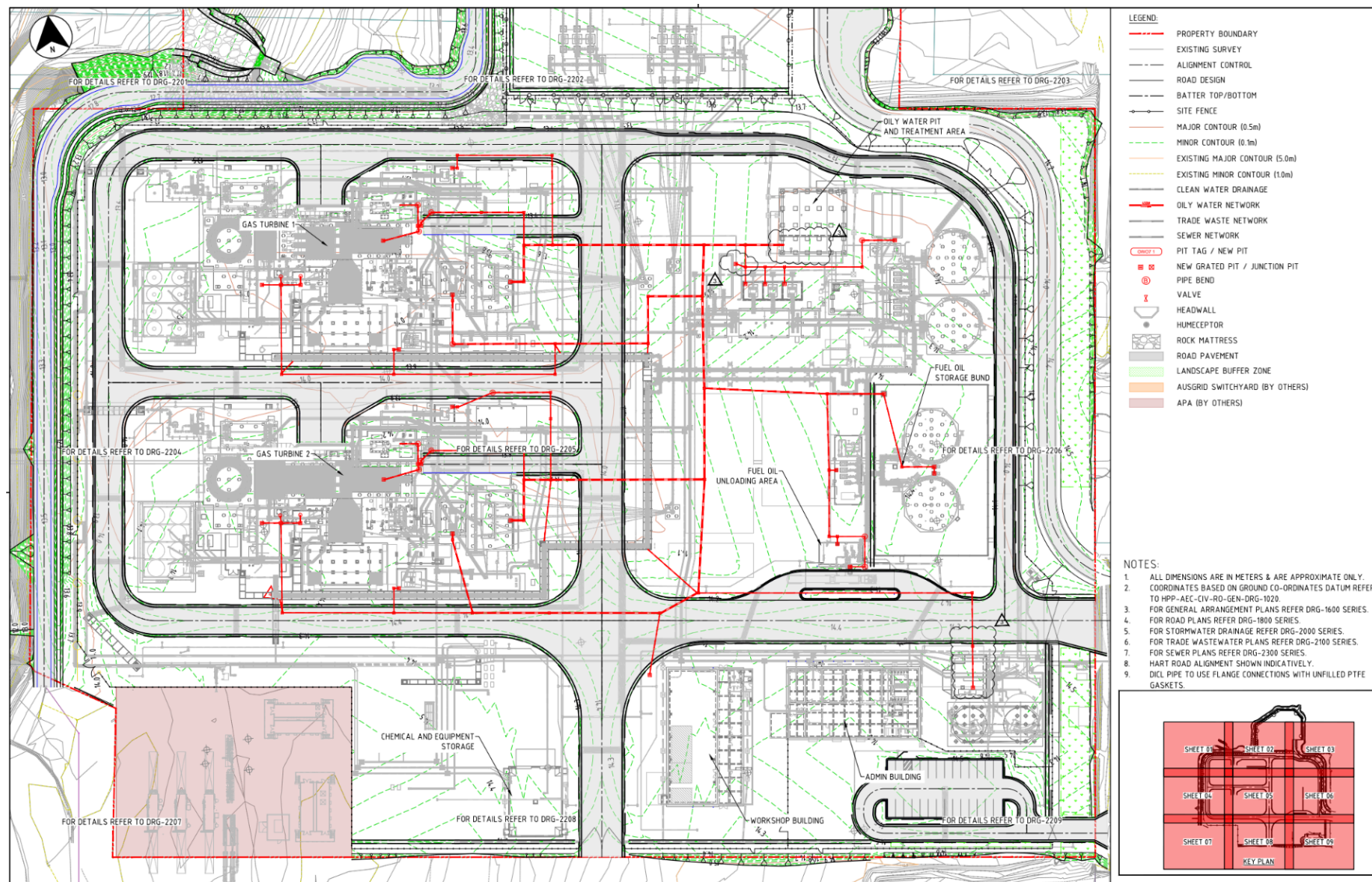


Figure 7.2: Indicative layout of the KKPS process (oily) water drainage system

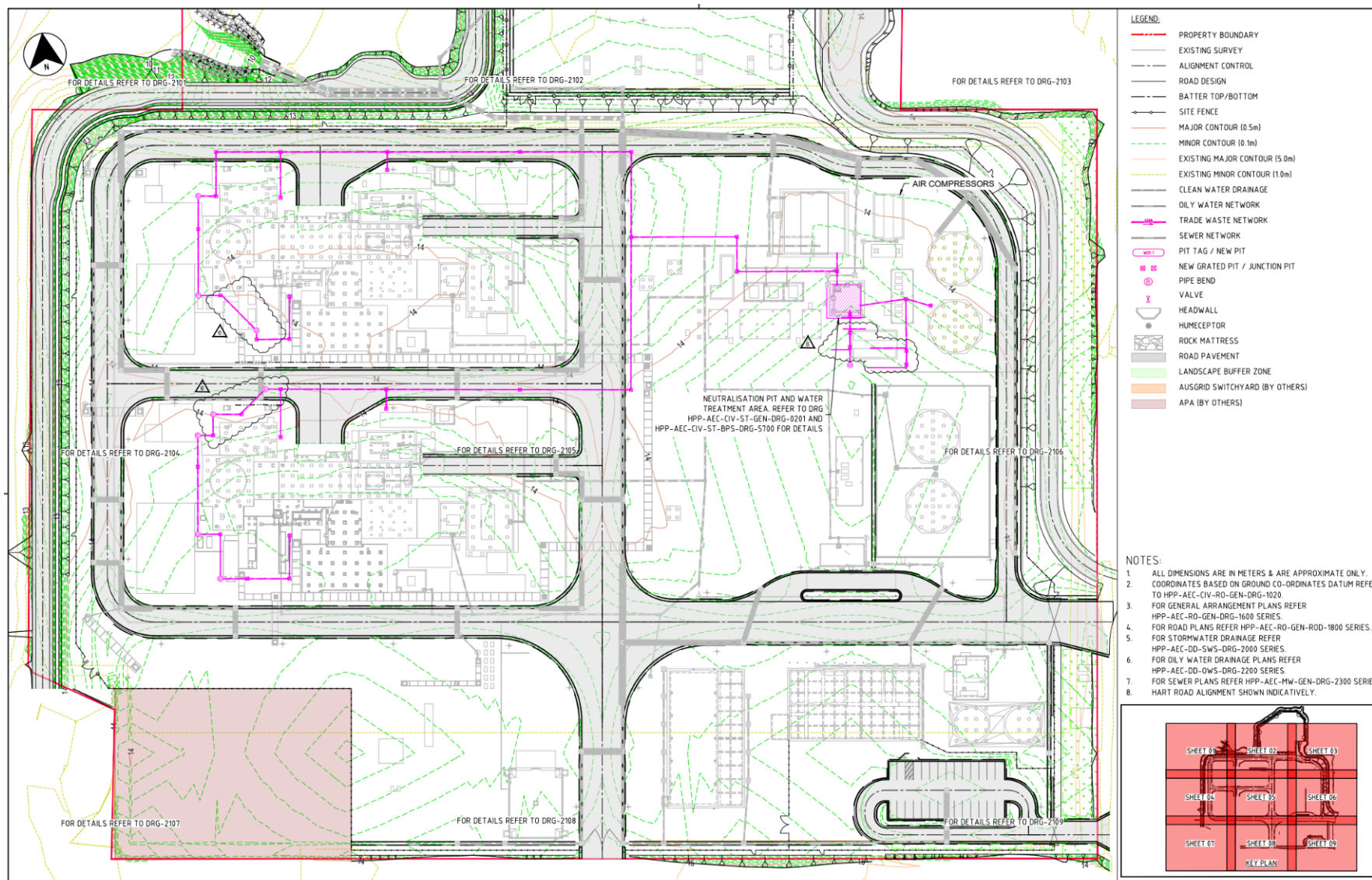


Figure 7.3: Indicative layout of the KKPS trade waste drainage system

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8.0 Monitoring

8.1 Surface Water

Surface water discharges may result from 'clean water' runoff collected in the site's stormwater drainage system, and treated process water with contaminants removed. All surface water discharges from the site occur from a single licenced discharge point located on the northern boundary of KKPS.

8.1.1 Water Quality Monitoring Location

KKPS has a single point of surface water discharge from the site located on the northern boundary of the site. The discharge point is defined in EPL21627 as the outlet of the stormwater drainage system, which discharges into the unnamed tributary of Blackwater Creek. Refer to **Figure 8.1**, **Figure 8.2** and **Table 8.1** for details.

Table 8.1: Water Monitoring/Discharge Location

	KKPS Stormwater Discharge Outlet
EPA Identification No.	3
Type of Monitoring Point	Water discharge quality monitoring
Type of Discharge Point	Discharge to water
Location Description	Outlet of stormwater system.
Coordinates	E 357 517 N 6 371 531 (GDA2020, MGA56) -32.784926, 151.478499



Figure 8.1: Aerial depiction of surface water monitoring/discharge location



Figure 8.2: KKPS stormwater discharge outlet

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8.1.2 Surface Water Discharge Monitoring Requirements

Surface water discharge monitoring requirements for KKPS are specified in EPL21627 (condition M2). These requirements are detailed in **Table 8.2** below.

Although water quality criteria have not been specified for KKPS in either EPL21627 or the SSI Approval, discharges from KKPS are still subject to Section 120 of the POEO Act, condition L1.1 of EPL21627, and condition B36 of the SSI Approval. In summary these requirements specify that the pollution of waters is prohibited.

In the absence of criteria, Snowy Hydro have adopted guideline values to assist in demonstrating compliance with section 120 of the POEO Act.

In addition to physical water samples, the personnel responsible for the collection of the water quality sample will conduct a visual assessment of the condition of the discharge point (stormwater outlet), and the unnamed tributary of Blackwater Creek to determine if there has been any deterioration due to channel erosion, scour, or other indications of changes to the condition of the receiving waterway.

Table 8.2: Surface Water Discharge Monitoring Requirements

Parameter	Unit of Measure	Monitoring Frequency	Sampling Method	Guideline
Oil and Grease	mg/L	Monthly during discharge	Grab sample	Nil visible
pH	pH	Monthly during discharge	Grab sample	6.5-8.5
Total Solids (Total Suspended Solids + Total Dissolved Solids)	mg/L	Monthly during discharge	Grab sample	–
Total Suspended Solids	mg/L	Monthly during discharge	Grab sample	50
Turbidity	NTU	Monthly during discharge	Grab sample	At a value calibrated to achieve <50 mg/L TSS ¹
Condition of Stormwater outlet, and receiving waterway	–	Monthly during sample collection, and following a significant storm event	Visual Assessment	Absence of waterway deterioration due to erosion or scour.

Note 1: To determine an appropriate guideline value, a site-specific relationship between TSS and turbidity needs to be established. Ongoing sampling and analysis of TSS and turbidity a NATA accredited laboratory will assist in developing a statistically correlated site based guideline for turbidity.

8.2 Groundwater

A regular groundwater monitoring program is not considered warranted during KKPS operations given the extensive design controls effectively eliminating KKPS operational impacts to local aquifers. The primary pathway for potential impacts to groundwater during operations would be via leaks and spills. These impacts however are effectively eliminated via site design including:

- Areas of site where spills and leaks may occur are fully sealed.
- Drainage from areas of site where spills are likely to occur have a fully segregated drainage network that discharges to the Oily Water Pit.
- All drainage from areas of site where leaks and spills are likely to occur are fully sealed.
- Implementation of bunding in accordance with the requirements of the SSI Approval, EPL21627, and AS1940.

In addition to the above design controls, civil assets including bunds and drainage are subject to integrity inspections from the Site Team, with additional engineering support if and when required.

The implementation of appropriate spill response processes and hazardous chemical storage and handling procedures further ensure groundwater impacts are appropriately managed.

8.3 Tradewaste/Wastewater

To facilitate the appropriate management of site wastewaters, including treated process water, and domestic effluents, Snowy Hydro and Hunter Water have established a trade waste agreement to manage the appropriate disposal of these wastewaters. The monitoring requirements for trade waste discharges are provided in **Table 7.3**, whilst parameters to be monitored and their maximum concentrations are detailed in **Table 7.4**.

Table 8.3: KKPS trade waste/wastewater discharge monitoring requirements

	Details
Tradewaste discharge point	Property sewer point of connection
Sampling and Testing	3x inspections per year 3x samples per year
Treatment equipment	Name: Holding Tank Size/Capacity: 64,000L Quantity: 1
Permitted discharge days/hours	7 days per week 24 hours per day

Table 8.4: KKPS tradewaste sample parameters

Parameter: Max Concentration	Parameter: Max Concentration	Parameter: Max Concentration
Aluminium: 100mg/L	Ethylbenzene: 1mg/L	TDS: 4000mg/L
Ammonia: 50mg/L	Fluoride: 30mg/L	Tin: 2mg/L
Arsenic: 0.5mg/L	Formaldehyde: 50mg/L	TKN: 150mg/L
Barium: N/A	Iron: 30mg/L	Total Organic Carbons: 1200mg/L
Benzene: 0.1mg/L	Lead: 0.4mg/L	Toluene: 0.5mg/L
BOD: 500mg/L	Manganese: 2mg/L	Total Oil and Grease: 150mg/L
Boron: 25mg/L	Mercury: prohibited	Total Phenol Compound: 10mg/L
Bromine: 26mg/L	Nickel: 1mg/L	Total Phosphorus: 20mg/L
Cadmium: 0.5mg/L	PFAS: prohibited	TPH: 30mg/L
Chlorine: 5mg/L	pH: 6.5 to 10.0	TSS: 500mg/L
Chromium: 2mg/L	Selenium: 2mg/L	Water Temperature: 38°C
Cobalt: 2mg/L	Silver: 0.5mg/L	Xylene: 1mg/L
COD: 1500mg/L	Sulphate: 2000mg/L	Zinc: 1.5mg/L
Copper: 2mg/L	Sulphide: 2mg/L	
Cyanide: 1mg/L	Sulphite: 15mg/L	

8.4 Rainfall and Flooding

KKPS operates an onsite weather station where parameters are continuously monitored. Rainfall is a key parameter that is monitored in accordance with Condition B26 of the SSI Approval and Condition M5.1 of EPL21627. Data from the weather station, including rainfall, is regularly reviewed and evaluated on a monthly basis.

Furthermore weather conditions, including rainfall are discussed and noted as a part of the KKPS Site Team's daily pre-start meetings.

Although KKPS is located on the fringe of the unnamed tributary of Black Waterhole's Creek and the Hunter River regional floodplain, the site elevation ensures the facility is positioned above the Probable Maximum Flood (PMF) level, with no anticipated flooding impacts to KKPS or local floodplain.

To ensure potential flood impacts are managed appropriately, visual assessments of the stormwater discharge outlet will be completed during water sample collection and following significant flows through the unnamed tributary of Black Waterholes Creek to ensure there has been no deterioration due to channel erosion or scour.

9.0 Management and Mitigation Measures

The management and mitigation measures described in **Table 9.1** will be implemented to ensure potential water related impacts are managed/mitigated appropriately.

Table 9.1: Water management/mitigation measures

Aspect	Description
Design & Commissioning	- Water is fundamentally managed by the design of separated site drainage systems consisting of - Stormwater (clean water) drainage - Process (oily) water drainage - Trade waste drainage, and - Domestic wastewater - All roads and operational areas on site are sealed, preventing contaminants reaching groundwater, as well as preventing erosion and sedimentation. - All drainage networks across site are fully sealed, preventing potential contaminants reaching groundwater - Sediment basins are not required for KKPS operations therefore the potential for groundwater intersection and/or basin leakage to groundwater is eliminated. - Hazardous material bunding is in accordance with SSI Approval, EPL21627 and AS1940 requirements - Demarcation of stormwater (blue) and process water (orange) drains/pits - Scour protection downstream of the licenced discharge point to mitigate impacts of physical flows to the unnamed tributary of Blackwater Creek during site discharges
Operational Controls	- Utilisation of the penstock valve to isolate/prevent offsite discharges - Utilisation of a humeceptor to efficiently remove total suspended solids and entrained hydrocarbons from runoff. - Implementation of effective controls, consistent with the Blue Book to manage erosion and sediment in areas of site that may cause offsite impacts and/or excessive sediment runoff to site drainage systems. - Original Equipment Manufacturers (OEM) and Production Operating Procedures. - Detailed Operating Instruction for KKPS to be utilised by the Generation Operations team.
Maintenance Controls	- All equipment is maintained according to Plant Operating, Maintenance and Calibration Manuals, Procedures & Schedules. - Maintenance activities are scheduled and tracked via the Ellipse management system and through Strategic Asset Management reviews.

Aspect	Description
Management Controls	- Regular assurance activities to ensure the effective implementation of water management/mitigation measures - Regular monitoring of discharge water quality, trade wastewater quality in accordance with EPL21627 and trade waste deed requirements - Daily review of weather conditions (including rainfall) by the site team - The employment of suitably qualified personnel - Appropriate training and demonstrated competency.
Wastewater Treatment	- Utilisation of the onsite oily water pit and oil/water separator to collect and treat all runoff collected in the process (oily) water drainage system - Utilisation of trade waste drainage collection system to collect all trade waste from site for discharge into the Hunter Water network - Trade waste overflows to enter oily water pit - Domestic wastewater network connected to Hunter Water network
Spill Controls	- The diesel storage tanks, and associated infrastructure are contained within bunded areas, where bund capacity is 110% of the maximum stored volume of diesel. - The site has a dedicated oil/chemical store with internal bunding and is fully enclosed - All operational areas within the gas turbine enclosure drain to the oil/water separator collection pit. - Utilisation of the onsite oily water pit and oil/water separator to collect and treat all stormwater/spills from areas that contain hydrocarbons - All workers are trained in appropriate spill response strategies - Spill kits are available on site to contain and clean up spills and leaks, and located at areas where hazardous materials are stored or handled

10.0 Compliance Management

Specific aspects of the compliance tracking program used to provide oversight for compliance at KKPS is provided in the OEMP.

Environmental compliance at KKPS is demonstrated in Annual Compliance Reports submitted to DPHI and DECCWW addressing compliance reporting obligations in the SSI and EPBC Approvals, and the 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, such as the Hunter Water Trade Waste Agreement..

10.1 Monitoring and Reporting

Regular monitoring and inspections of the management and mitigation measures outlined in this Water MP shall occur, and will include, however not be limited to:

- General site based inspections of KKPS included as a routine task for KKPS Production Technicians to ensure the site is being maintained and operated in a manner that ensures potential impacts to water (surface water and groundwater) are appropriately managed. As a minimum, site inspections are conducted on a weekday basis, with numerous ad-hoc opportunities to observe site conditions by all site personnel.
- Targeted inspections conducted by Snowy Hydro personnel, or an external party to ensure existing water management measures remain effective and fit-for-purpose. Targeted inspections are conducted on at least a monthly frequency, with additional ad-hoc targeted inspections undertaken to identify improvement opportunities or for a specific water management concern.
- Environmental auditing and assurance activities to assess ongoing compliance with the requirements of this Water MP, and applicable Snowy Hydro policies and procedures
- Investigation of water related incidents/community complaints, to identify causes, preventative actions and improvement opportunities, as well as tracking identified actions to ensure timely and effective implementation.

Further detail on monitoring and reporting responsibilities is contained in **Table 10.1**, as well as the KKPS OEMP.

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Table 10.1: Water Monitoring and Reporting Responsibilities

Monitoring/ Reporting Requirement	Frequency	Responsibility
General Site Inspection, incorporating inspection of water management system features	Weekdays	Site Production Team
Targeted water management system inspections	Monthly	Site Production Team
Environmental assurance activities	Various	Environment Team
Investigation of water related incidents/complaints	As required	Plant Manager & Environment Team
Stormwater discharge monitoring	Monthly during discharge	Site Production Team
Trade wastewater discharge monitoring	3x per year (4 monthly)	Site Production Team
Visual assessments of the Stormwater Discharge outlet and tributary of Black Waterholes Creek	Monthly, and following significant storm activity	Site Production Team & Environment Team
Various external reporting requirements, including publication of monitoring data, annual compliance reporting, submission of updated versions of the Water MP	As required	Environment Team

10.2 Auditing

Auditing and assurance activities are undertaken to assess the effectiveness of environmental controls, and ongoing compliance with the KKPS OEMP and associated subplans, applicable SSI Approval conditions, EPBC Approval conditions and EPL21627.

Audits and assurance activities at KKPS include:

- Regular site based inspections
- Internal audits
- External audits, consisting of;
 - SSI Independent Compliance Audits
 - SSI Independent Site Hazard Audits
 - EPBC Independent Audit
 - Environmental Management System Audits

Auditing and assurance activities will be undertaken in accordance with the KKPS OEMP.

10.3 Training

Formal training is developed in accordance with Snowy Hydro's Training and Development Procedure, 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 training and awareness activities that are facilitated include:

- Snowy Hydro Environmental Induction
- KKPS Site Induction
- Environmental Compliance Training
- Spill Response Training
- Specialised Environmental Training
- Targeted Environmental Awareness Packages
- Daily Pre-start Meetings

Further detail on environmental related training and awareness packages are described in the KKPS OEMP

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10.4 Water 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, including water management.

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.

Detail on the roles and responsibilities for environmental management, which includes water management, is provided in the KPS OEMP.

10.5 Reporting and Notification Requirements

10.5.1 Incidents - Internal Reporting

Incidents at KKPS are managed in accordance with Snowy Hydro's Incident Management Procedure, and classified in accordance with the Safety and Environment Incident Classification Matrix. Incident management procedures are accessible on the Snowy Hydro Intranet, which provide guidance on internal notification and investigation requirements.

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

10.5.2 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 full details on the external reporting requirements for environmental incidents, please refer to the KKPS OEMP.

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10.5.3 Non-compliance Notification - SSI Approval

As per Condition C7 of the SSI Approval, Snowy Hydro must notify the DPHI Secretary via the Major Projects Portal of any non-compliance with the conditions of the SSI Approval, within seven days after becoming aware of the non-compliance. The details required for this notification are provided in condition C8 of the SSI Approval.

Note that this excludes any non-compliances that have already been notified via the Major Projects Portal as an incident.

Further details on non-compliance notification requirements are provided in the KKPS OEMP.

10.5.4 Non-compliance Notification - EPBC Approval

As per Condition 8 of the EPBC Approval, Snowy Hydro must notify the Federal Department responsible for administering the EPBC Act (presently the Department of Climate Change, Energy, the Environment and Water) in writing of any incident, as defined by the terms of the approval, non-compliance with the conditions of the EPBC Approval or non-compliance with commitments made in any plans required under the EPBC Approval as soon as practicable, but no later than two business days after becoming aware of the non-compliance. The details required for this notification and follow up requirements are provided in conditions 8 and 9 of the EPBC Approval.

Further details on non-compliance notification requirements are provided in the KKPS OEMP.

10.5.5 Statutory Environmental Reporting and Notifications

At KKPS, there are numerous statutory environmental reporting and notification requirements. Further detail on the statutory environmental reporting and notification requirements can be found in the KKPS OEMP.

10.5.6 Hunter Water Notification - Exceedance of Trade Waste Conditions

As per the requirements of the Hunter Water Trade Waste Deed for KKPS, Snowy Hydro must immediately report any event that causes or is likely to cause an exceedance of the Deed conditions to the Hunter Water Corporation Contact Centre. Notifications must be made by phone or email to

- Phone: 1300 657 000
- Email: plumbing@hunterwater.com.au

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10.6 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 Snowy Hydro's Information Asset Management Procedure.

EPL21627 specifies documentation and records relating to environmental management, monitoring, and reporting must be retained for a minimum of four years. These documents and records must be available onsite in hard copy or electronically within the Snowy Hydro Document Management System.

10.7 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.

The provision of the above contact details also satisfies the requirements of Condition C20(a)(viii) of the SSI Approval.

Full details can be found in the KKPS OEMP.

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11.0 Document Review

The KKPS OEMP and associated subplans, including this Water MP, are not static documents, and are regularly reviewed and updated as required to reflect changes in environmental management requirements and/or statutory obligations. Updates to this plan may be made in response to:

- scheduled reviews of the OEMP, and/or associated subplans
- 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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