INTERNAL & EXTERNAL COMMUNICATION

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ELABORATED:	*REVISED:*	*APPROVED:*
Date:	Date:	Date:

1 PURPOSE

The purpose of this procedure is to build understanding, cooperation, and involvement from all WWTP Staff in the performance of their duties in an environmentally conscious manner, and to define the steps that the Utilities follow to:

- Control the receipt, documentation and response to external communications regarding the Utilities Environmental Aspects.
- Consider external communication procedure on Significant Environmental Aspects.
- Document related decisions.

This procedure provides a process for addressing communications as required by the International Standard ISO 14001, section 4.4.3.

2 SCOPE

The following procedure describes the process for all communications both internal and external dealing with Environmental, Safety and Health issues. Issues that may be communicated are: audit finding, spills, waste generation, accident information, risk assessment, control information, etc..

The International Standard ISO 14001, section 4.4.3, with regard to Environmental Objectives & Targets, External Communication requires establishing processes to report internally and, where desired externally, on the environmental activities of the organization and on receiving, documenting and responding to communications from external interested parties.

3 RESPONSIBILITY & AUTHORITY

3.1 Internal Communication

- It is the responsibility of every Utilities staff member to communicate environmental concerns, problems, or suggestions to their supervisor.

3.2 External Communication

- The Department Director (or designee) investigates the need for external communication.
- The Customer Relations Specialist prepares releases of public interest.
- The WWTP Director (or designee) authorizes prepared releases to the public.

4 PROCEDURE

4.1 Internal Communications

The internal communications take place regarding the WWTP Environmental Aspects, Safety and Health aspects, the Environmental Management System (EMS), the Safety Management System (SMS) and their respective policies. This information will be communicated utilizing a variety of media to include communication channels such as the following:

4.1.1 Management Channels

The traditional flow of information from one management level to the next is appropriate and will be used to communicate environmental information. Periodic, or routine staff meetings with open dialogue are encouraged.

4.1.2 Internal Newsletters

Certain environmental communications will be made through internal newsletters.

4.1.3 Videos

Videos may be used to relay environmental information to large groups of associates.

4.1.4 E-mail and Special Memos

Announcements concerning environmental improvement programs, upcoming internal audits, inspections, etc. will be disseminated through e-mail for large groups of associates or by special memo to specific individuals or groups.

4.1.5 Suggestion Boxes

Suggestion boxes will be made readily available to all associates. Communication in this form coming directly from individual associates in a valuable source or information about potential environmental impacts. Suggestions will be evaluated concerning environmental improvements. Rewards will be considered for suggestions that are implemented.

4.2 External Communications

4.2.1 Receipts and Processing

- Receive all communications from external interested parties:
    - Any staff member receiving a call about WWTP must log the following information in the Communication Log book by the corresponding phone: name, address, and phone number, date, and time, reason for call and where the call was referred to.
    - The call shall then be transferred to the appropriate personnel.
    - If the person identified to handle the call is unavailable, the person who received the call must take a message for the individual and make sure the message is routed properly.
    - The person identified to handle the call shall address a caller's concerns and answer all questions as completely as possible.
    - If the complaint is deemed to be a valid concern, immediately inform the Plant Operations Superintendent.

- Review and record any relevant communication.
- Answer communications that fall within your scope of responsibility.
- Forward communications to other responsible departments including, but not limited to, Corporate Environmental, Safety and Health.

4.2.2 Communications on Significant Environmental, Safety and Health Aspects. Communication Channels:

- With regard to WWTP Environmental Aspects or EMS, the Department Director (or designee) investigates the need for external communication on a case-by-case basis. The investigation can be initiated by, but is not limited to, the following:
    - Complaints and/or inquires from customers, community groups, or other interested parties.
    - External promotional activities regarding WWTP Environmental Policy or programs.
    - New or changing environmental regulations.
- The Department Director (or designee) identifies the extent and/or impact of the problem or inquiry and determines what information needs to be communicated.
- The Department Director or (designee) obtains the needed information from the appropriate associates within WWTP or the department and, as necessary assistance from the Customer Relations Specialist, who constructs the content, format, and method of the communication accordingly. Designated individuals are then authorized to release information to external parties.
- Statements regarding WWTP Environmental Policy, Significant Environmental Aspects and their potential impacts, reports on environmental performance or compliance with regulatory requirements and communications to legal entities shall be reviewed and approved by the WWTP General Manager.
- Executive management (or designee) issues the communication to the required recipients and interested parties.

- A copy of communication received or sent, as well as any requests that initiated the communication and/or requests for the information shall be retained for a period of 5 years.
- Information in the communication should be understandable, adequately explained, verifiable, and presented in a consistent form. Methods to be considered include, but are not limited to:
    - External newspapers or newsletters.
    - Public announcements and/or news conferences (TV, radio, etc.).
    - Paid advertisements or public notices in newspapers, industry journals, or other publications.
    - Annual reports.
    - Regulatory submissions and public records.
    - Commission meetings.
    - Letters, memos and other correspondence.
    - Electronic mail messages; faxes, etc.
    - Internet Web Site.