





## 7.0 Internal Communication

### 7.1 TYPES OF INTERNAL COMMUNICATION

### 7.2 IDENTIFY INTERNAL COMMUNICATION NEEDS

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## 7.1 Types of Internal Communication

### Keys



**Develop and maintain procedures for internal communication of the environmental management system and environmental issues between personnel across functional and organizational levels. [R 324.1505 (2)(b)(ix)]**

**Communication goes two ways. Provide your employees with a way to communicate back to you on environmental concerns and ideas for improvement.**

Communication is used to transfer information between similar and diverse groups of people. For an environmental management system, you will want to communicate to many diverse groups of employees on environmental issues. To be effective, include in your system:

1. Communication that will reach each target audience, and
2. Communication that the audience will understand.

The types of communication that can be used to reach employees in a facility include the following:

- Posted notices on bulletin boards,
- E-mail or internal electronic memos,
- Brief status updates on objectives and targets at employee/safety meetings,
- Company newsletters,
- Publicized awards/incentives programs recognizing individuals for environmental improvements and ideas.

Keep in mind that just one standard form of communication will probably not reach everyone. Look at your target audience (employees), what you want to communicate, and determine how best to reach them.

Communication from your employees is also important for effective operation of your EMS. Internal communication is establishing and/or maintaining an atmosphere of openness, where both good and bad information can be transmitted internally without fear of reprisal or negative consequences. Environmental performance and improvement will only occur if people feel free to identify and communicate to others that there is a problem, and also that there is a solution.





## 7.2 Identify Internal Communication Needs

Identify the internal communication systems you use at your facility, and what changes or modifications are needed for EMS communication.

1. Determine the types of communication at your facility across functional groups.
2. Does certain types of information (e.g., health insurance, employee benefits) reach everyone or is certain information designed to reach certain target groups? Decide what information goes to what target group.
3. Designate a person to handle internal communication for EMS status reports and environmental issues.
4. Develop methods of communication that will reach your target audience, preferably building on information systems already in place at your facility.

Communications can be designed with standard formats and eye catching logos so that the audience knows that the information will pertain to the EMS before they ever start reading it. Two commonly used forms of communication include periodic communications (e.g., newsletters, progress reports, status logs) and single-event or one-time only notices.

1. Develop a standard format or logo for periodic EMS communications and updates for the recognition factor.
2. Design a single-event notice or bulletin to provide quick highlights and need-to-know information that employees will look at immediately.

After you list the forms of internal communication currently used at your facility, identify gaps that must be filled for your EMS. Develop communication for your EMS to fill the gaps. On the following page is an example table of internal communication practices for Joseph's Forklift and Hauling Company. Also, included for your review is the Internal Communication of Environmental Actions or Conditions for Wisconsin Electric - Presque Isle Power Plant. A blank table (Form 7.1) is provided for your use or you can create your own documentation table/system for internal communication.



EXAMPLE 7.1

**Joseph's Forklift and Hauling Company**

**Internal Communication**

<u>Type of Communication</u>	<u>Originating Department</u>	<u>Target Audience</u>
Company Newsletter <ul style="list-style-type: none"> <li>• EMS Status/Compliance</li> <li>• Objectives and Targets Status</li> </ul>	EMS Manager/ Administration	All Employees
Department Memo or E-mail <ul style="list-style-type: none"> <li>• Environmental Data/ Malfunctions</li> <li>• Operational Malfunctions</li> <li>• Planned Shutdowns</li> <li>• Posting of Notices for Deadlines</li> <li>• Notice of Inspection and Audits</li> </ul>	EMS Manager/Operations Supervisor	Operations/Shipping/ Warehouse Employees
Employee Bulletin Board <ul style="list-style-type: none"> <li>• Tracking Logs to Update EMS Status</li> <li>• Environmental Incentives Program and Status</li> </ul>	EMS Manager/Operations Supervisor	All Employees
EMS Status Reports on Procedures and Work Instructions	Supervisors	EMS Manager/Administration
Citizen Complaints and Status	EMS Manager/ Administration	All Employees
Notices of Violation, Spills, and Corrective Actions	EMS Manager/ Administration	Operations/Shipping/ Warehouse Employees on a need to know basis
Employee Suggestion Box	All Employees	EMS Manager/Administration/ Supervisors

Approved by: Chris Joseph

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9.0 Environmental Communications



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**Table 9-1**

**Presque Isle Power Plant  
Internal Communication of Environmental Actions or Conditions**

***Within Presque Isle Power Plant***

Action or Condition	Initiator	Recipient	Description
<b>Malfunction / Unusual Event</b>	<ul style="list-style-type: none"> <li>Operating Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>IPT Team Leader (Operations)</li> <li>Plant Team Leader</li> <li>Chief Engineer</li> <li>Environ. Specialist</li> </ul>	Failure or unplanned shutdown of pollution control equipment component, including but not limited to: <ul style="list-style-type: none"> <li>Precipitator</li> <li>Monitor (SO<sub>2</sub>, NO<sub>x</sub>, CO<sub>2</sub>, Flow, Opacity)</li> </ul>
<b>Operational Excursion / Regulatory Exceedance</b>	<ul style="list-style-type: none"> <li>Operating Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>IPT Team Leader</li> <li>Env. Specialists</li> <li>Chief Engineer</li> <li>Plant Team Leader</li> </ul>	Operational or compliance limits for air emissions exceeded: <ul style="list-style-type: none"> <li>Opacity — 6-min. avg. ≥ 20% *†</li> <li>SO<sub>2</sub> — Units 7-9 — 3 hr rolling avg. ≥ 1.2 lb/MBTU</li> <li>NO<sub>x</sub> — Units 7-9 — 3 hr rolling avg. ≥ 0.70 lb/MBTU</li> <li>SO<sub>2</sub> — Flues 4-6 — 24 hr daily avg. ≥ 1.67 lb/MBTU</li> </ul> * 1 (20% ≤ 6-min. avg. ≤ 27%) excludable per hour † 20 or more consecutive 6-min. avgs. ≥ 20% with no excludable periods
<b>Planned Shutdown or Startup of APC Equipment</b>	<ul style="list-style-type: none"> <li>Operating Team Leader</li> <li>IPT Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>IPT Team Leader</li> <li>Plant Team Leader</li> <li>Environ. Specialist</li> </ul>	Planned shutdown or startup of air pollution control equipment, including measures taken to minimize the downtime of the equipment.
<b>Spill or Release</b>	<ul style="list-style-type: none"> <li>Operating Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>PIPP Emergency Coordinator</li> <li>IPT Team Leader</li> <li>Chief Engineer</li> <li>Plant Team Leader</li> </ul>	Accidental spill or release of: <ul style="list-style-type: none"> <li>Fuel oil</li> <li>Boiler or wastewater treatment chemicals</li> <li>Oil or lubricant</li> <li>Solvent</li> </ul>
<b>Citizen / Customer Complaint</b>	<ul style="list-style-type: none"> <li>Operating Team Leader</li> <li>IPT Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>Environ. Specialist</li> <li>Plant Team Leader</li> <li>Chief Engineer</li> </ul>	Call or other communication from a neighbor or customer related to environmental operations at the plant.



# 9.0 Environmental Communications



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***Between PIPP and We Energies Environmental Staff***

Action or Condition	Initiator	Recipient	Description
<b>Malfunction / Unusual Event</b> -- or -- <b>Repeated Malfunctions / Unusual Events</b>	<ul style="list-style-type: none"> <li>• Plant Team Leader</li> <li>• Chief Engineer</li> <li>• Env. Specialist</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. Manager</li> </ul>	Failure of pollution control equipment components, including but not limited to: <ul style="list-style-type: none"> <li>• Precipitator</li> <li>• CEMs or COMs</li> <li>• Spill or release of hazardous materials</li> </ul>
<b>Operational Regulatory Excursions</b>	<ul style="list-style-type: none"> <li>• Plant Team Leader or Chief Engineer</li> <li>• Environ. Specialist</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. Manager</li> </ul>	MDEQ notification required if the following occurs: <ul style="list-style-type: none"> <li>• <i>Opacity</i> — 20 or more consecutive 6-min. avgs. <math>\geq 20\%</math> with no excludable periods</li> <li>• <i>SO<sub>2</sub></i> — Units 7-9 — 3 hr rolling avg. <math>\geq 1.2</math> lb/MBTU</li> <li>• <i>NO<sub>x</sub></i> — Units 7-9 — 3 hr rolling avg. <math>\geq 0.70</math> lb/MBTU</li> <li>• <i>SO<sub>2</sub></i> — Flues 4-6 — 24 hr daily avg. <math>\geq 1.67</math> lb/MBTU</li> <li>• <i>NPDES</i> permit limit excursions</li> </ul> <p><i>Note: See Table 9-2 for specific instructions regarding agency notifications.</i></p>
<b>Planned Shutdown or Startup of APC Equipment</b>	<ul style="list-style-type: none"> <li>• Plant Team Leader</li> <li>• IPT Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. - Air Quality Manager</li> </ul>	Planned shutdown or startup of air pollution control equipment, including measures taken to minimize the downtime of the equipment.
<b>Fuel or Process Change</b>	<ul style="list-style-type: none"> <li>• Plant Team Leader</li> <li>• Chief Leader</li> <li>• IPT Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. Manager</li> </ul>	Change in product usage or process that requires agency notification
<b>Regulatory Agency Inspection</b>	<ul style="list-style-type: none"> <li>• Plant Team Leader</li> <li>• IPT Team Leader</li> <li>• Chief Engineer</li> <li>• Environ. Specialist</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. Manager</li> </ul>	Receipt of verbal or written request for visit and/or inspection or unannounced visit of facility by agency staff
<b>Citizen / Customer Complaint</b>	<ul style="list-style-type: none"> <li>• Plant Team Leader</li> <li>• IPT Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. Manager</li> <li>• UP Customer Affairs</li> <li>• WE Corporate Commun.</li> </ul>	Receipt of verbal or written citizen or customer complaint shall result in: a) notification of the Environmental Process within 24 hours, and b) completion of <i>Citizen / Customer Communication</i> form. (See FO Procedure No. 301 — Customer Environmental Complaints)



# 9.0 Environmental Communications



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Action or Condition	Initiator	Recipient	Description
<b>Spill or Release</b>	<ul style="list-style-type: none"> <li>• PIPP Emergency Coordinator</li> <li>• Plant Team Leader</li> <li>• IPT Team Leader</li> <li>• Chief Engineer</li> </ul>	<ul style="list-style-type: none"> <li>• We Energies Environ. Water Quality Manager</li> </ul>	Accidental spill or release of: <ul style="list-style-type: none"> <li>• Fuel oil or diesel<sup>1</sup></li> <li>• Boiler or wastewater treatment chemicals</li> <li>• Oil or lubricant</li> <li>• Solvent</li> </ul> <p><i>Note: Refer to SPCC Plan, Volume 1 and 2 for specific instructions regarding proper response and handling of materials in the event of a spill or release.</i></p>

***Between PIPP / Environmental and Corporate Communications***

Action or Condition	Initiator	Recipient	Description
<b>Citizen / Customer Complaint</b>	Plant Team Leader or We Energies Environ. Manager	Corporate Communicat'ns	Identify source and nature of the citizen/customer complaint, including cause, and steps taken to alleviate or avoid future occurrences if appropriate.
<b>Receipt of Notice of Violation</b>	Plant Team Leader or We Energies Environ. Manager	Corporate Communicat'ns	Identify nature of violation, including relevant details regarding cause, plant actions to alleviate or avoid future occurrences, follow up actions with the regulatory agency, and any specific External Affairs actions.
<b>Spill or Release</b>	Plant Team Leader or We Energies Environ. Manager	Corporate Communicat'ns	Type and extent of spill, evidence of any release off site, and follow up actions as appropriate.

<sup>1</sup> Plant operators and Plant Manager should refer to Emergency Spill Response Plan for the Presque Isle Power Plant, Book 1, pages 20 and 21 for exact reporting procedures in the event of a SO<sub>2</sub>, oil, or solvent spill.





## 7.3 EMS Procedure for Internal Communication

A procedure for internal communication must be developed for your EMS. The procedure should include:

- Identification of the types of communication,
- Responsibility, and
- Review and updating for communication efficiency.

On the following page is a procedure for Internal Communication for Joseph's Forklift and Hauling Company's EMS. Also, included for your review is a communication procedure for Denso Mfg. Michigan, Inc., which was developed for their EMS. Review these examples and develop your procedure for your system documentation.



## EXAMPLE 7.2

### Joseph's Forklift and Hauling Company

#### EMS Procedure No. EMS-6 Internal Communication

##### I. Purpose

This procedure is to establish and maintain internal communication procedures for Joseph's Forklift and Hauling Company.

##### II. Scope

This procedure contains provisions to identify, implement and update communications necessary for the environmental management system and to broadcast environmental issues across functional groups.

##### III. Definitions

N/A

##### IV. Procedures

###### A. Identify Communications Methods

Identify internal communications for operations and activities, EMS status, environmental status and issues, and employee feedback. Include the following types of communications:

- Posted notices on bulletin boards,
- E-mail or internal electronic memos,
- Brief status updates on objectives and targets at employee/safety meetings,
- Company newsletters,
- Publicized awards/incentives programs recognizing individuals for environmental improvements and ideas,
- Employee suggestion boxes and surveys.

Create a general listing of internal communications as a reference for the EMS. Include type and method of communication, the initiator and the recipient of the communication.

###### B. EMS Communication

Communication on the status of the EMS objectives, targets, and compliance is the responsibility of the EMS Manager. Other forms of communication for environmental issues, and operations and activities is the responsibility of the originating department.

**V. Records**

A list of internal communications for the EMS will be kept and updated as necessary for reference.

**VI. Updates and Reviews**

Internal communication methods will be reviewed and updated annually, or upon the addition of new environmental/legal requirements and process changes.

**VII. Responsibilities**

Updating of internal communications procedures must be coordinated and approved by the EMS Manager.

**VIII. Related Documentation**

A list of internal communications and procedures will be maintained on file by the EMS manager.

**Written by:** Jill Jones

**Date:** August 28, 1999

**Reviewed by:** Chris Joseph

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<b>DENSO MFG. MICHIGAN, Inc.</b> One Denso Rd., Battle Creek, MI		<b>Standard Reference:</b> ISO 14001(96) Chapter 4.4		<b>Environmental Manual</b> Communication		<b>Page</b> 1
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## 1.1 PURPOSE

This procedure identifies DMMI's internal and external communications on DMMI's Environmental Management System and environmental aspects.

## 1.2 SCOPE

This procedure applies to all departments at DMMI.

## 1.3 RESPONSIBILITY

It is the responsibility of Management at DMMI to internally communicate information, as needed, on DMMI's Environmental Management System. It is the responsibility of the Environmental Engineering Section to handle external communications with environmental regulatory agencies. It is the responsibility of the Communications Section to handle external communications with other (non-regulatory) interested parties.

## 1.4 ACTIONS AND METHODS

### 1.4.1 Communications on Significant Environmental Aspects

\*As directed by management, DMMI's Significant Impacts (S.I.) will not be proactively distributed to the public. Requests for the S.I. will be evaluated on a case by case basis by the Environmental section, and the management Representative.\* Legal counsel is consulted with regard to such communications as deemed appropriate.

### 1.4.2 Internal Communications

Internal communications on DMMI's Environmental Management System are provided, as needed, at the monthly Environmental Meeting. The Environmental Engineering Section is responsible for Environmental Meeting minutes. Internal communications on DMMI's Environmental Management System can also be provided by written memos, electronic mail, telephone conversations, or in person.

### 1.4.3 External Communications with Regulatory Agencies

Inquires and other communications from environmental regulatory agencies may be received by a number of DMMI representatives. Such communications should be directed to the Environmental Engineering Section of Production Engineering I, and are handled according to Work Instruction #EN-EM-443-01-PE17, Liaison Functions. Legal counsel is consulted with regard to such communications as deemed appropriate. Written communications with regulatory agencies are kept on file in the Environmental Engineering Section.

<b>DENSO MFG. MICHIGAN, Inc.</b> One Denso Rd., Battle Creek, MI		<b>Standard Reference:</b> ISO 14001(96) Chapter 4.4		<b>Environmental Manual</b> Communication		<b>Page</b> 2
<b>Issue Date:</b> 2/26/98	<b>Revision Date:</b> 7/10/01	<b>Approved:</b> D. Grimmer	<b>Checked:</b> M. Myszka	<b>Written:</b> J. Saltzman	<b>Number:</b> EN-EM-443-01	

#### 1.4.4 External Communications with Other (Non-Regulatory) Interested Parties

External communications with other interested parties are handled by the Communications Section of Corporate Services according to their External Communication, ISO 14000 procedure. Written communications with other interested parties are kept on file by the Communications Section.

#### 1.5 REFERENCES

Work Instruction #EN-EM-443-01-PE17, Liaison Functions  
Procedure #EN-EM-453-01, Records  
Procedure #EN-EM-460-01, Management Review  
External Communication, ISO 14000 Procedure

#### 1.6 RECORDS

Records produced from this procedure are handled per Records Procedure #EN-EM-453-01.



## 7.4 Internal Communication Completion Checklist

### Check Box

- 1. Have you identified what you want to communicate?
- 2. Have you determined your target audience(s)?
- 3. Have you determined how to reach your audience?
- 4. Have you established the methods you are going to use for internal communications?
- 5. Have you written a procedure for internal communication for your EMS?

