





## 8.0 External Communication

### 8.1 TYPES OF EXTERNAL COMMUNICATION

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## 8.1 Types of External Communication

### Keys



**Establish and maintain an effective public communication process and procedures for communicating information on environmental issues and the environmental management system with the public, including the local community and environmental interest groups, that facilitates and encourages public understanding and dialogue on environmental issues. [R 324.1505 (2)(b)(x)]**

Whether your company is located in rural setting, industrial park or a suburb, your operations may have the potential to impact not only the environment, but your neighbors as well. How well you communicate with your neighbors could mean the difference between cooperative friendly neighbors and uncooperative unfriendly neighbors. To avoid the latter, create a pathway to communicate to your neighbors and for them to communicate with you on environmental issues and public concerns.

1. How do you communicate with the public and regulating agencies?
2. How well you communicate with the public and regulating agencies makes a big difference in public perception and community relations.

Many different forms of communication can be used to establish dialog with the local community and the regulating agencies. Company participation and sponsorship in community activities builds relationships and provides pathways for communication. Following are different communication methods you could employ:

- Participate in the Chamber of Commerce,
- Join/support local action groups that focus on the environment,
- Sponsor community events,
- Hold an open house for the community and the families of your employees,
- Issue press releases on the environmental stewardship activities your company is initiating,
- Set up a hotline for your neighbors to call with questions and complaints (odor, etc.) regarding your facility,
- Join your industry association,
- Give presentations and tours for school groups, or the general public.





## 8.2 Identify External Communication Needs

Identify the types of external communication you use at your facility, and what additions or modifications are needed to establish a dialog with the public.

One central contact person is needed to handle external inquiries so that conflicting responses are not sent out. Communications to regulating agencies are also better when handled by a designated person. The agency knows who to contact in the event of an emergency and a relationship is built which facilitates easier communications and fewer misunderstandings between your company and the regulating agency.

1. Determine who makes up your target audience.
2. Determine what types of information need to be communicated.
3. Determine how best to communicate this information.
4. Develop methods of communication that will reach your target audience, preferably building on information systems already in place at your facility.
5. Designate a central contact to handle external communications.

After you list the forms of external communication currently used at your facility, identify gaps that must be filled for your EMS. Develop communication practices for your EMS to fill the gaps. On the following page is an example table of external communication practices for Joseph's Forklift and Hauling Company. Also, included for your review is the External Communication of Environmental Actions or Conditions for Wisconsin Electric - Presque Isle Power Plant. A blank table (Form 8.1) is provided for your use or you can create your own documentation table/system for external communication.



EXAMPLE 8.1

**Joseph's Forklift and Hauling Company**

External Communication

<u>Type of Communication</u>	<u>Originating Department</u>	<u>Target Audience</u>
Press Releases	EMS Manager	General Public
Correspondence with the MDEQ <ul style="list-style-type: none"> <li>• Air Quality Division - Air Permit</li> <li>• Water Bureau - Storm Water</li> <li>• Waste &amp; Hazardous Materials Division - Hazardous Waste and Manifests</li> <li>• Spill or Release</li> </ul>	EMS Manager	Divisions of the MDEQ
Community Hotline <ul style="list-style-type: none"> <li>• Truck Traffic</li> <li>• Noise</li> <li>• Odor Complaints</li> <li>• Environmental Complaints</li> </ul>	EMS Manager/ Administration	General Public
Annual Open House <ul style="list-style-type: none"> <li>• Employees and Families</li> <li>• Neighbors</li> </ul>	EMS Manager/ Administration	General Public
4-H Club	EMS Manager/ Administration	Community Participation
Parks and Recreation Planning Committee	EMS Manager/ Administration	Community Participation
Rouge River Watershed - Rouge Friendly Business Program	EMS Manager/ Administration	Community Participation

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**Table 9-2**

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

***Between WE Environmental Staff and Agencies***

Action or Condition	Initiator	Recipient	Description
<b>Compliance Testing — Air Quality</b>	<ul style="list-style-type: none"> <li>We Energies Environ. Air Quality Manager</li> </ul>	<ul style="list-style-type: none"> <li>MDEQ Marquette — Air Quality</li> </ul>	Inform the MDEQ Air Quality group in writing at least 20 working days prior to conducting any performance demonstration tests in order to allow the MDEQ to review and to have a representative observe such tests.
<b>Malfunction — Air Quality Permit</b>	<ul style="list-style-type: none"> <li>PIPP Environmental Staff</li> <li>We Energies Environ. Air Quality Manager</li> </ul>	<ul style="list-style-type: none"> <li>MDEQ Marquette — Air Quality</li> </ul>	Inform the MDEQ Air Quality group verbally within two business days of any equipment malfunction or event that may result in an emission violation as per the Air Quality permit. Provide written notice of malfunction within 10 days after the malfunction has been corrected.
<b>Opacity Exceedance — Air Quality</b>	<ul style="list-style-type: none"> <li>PIPP Environmental Staff</li> <li>We Energies Environ. Air Quality Manager</li> </ul>	<ul style="list-style-type: none"> <li>MDEQ Marquette — Air Quality</li> </ul>	Inform the MDEQ Air Quality group in writing within 10 business days of any air emission noncompliance with the Air Quality permit, including the emission exceeded, the cause, duration, and steps taken to prevent reoccurrence. as per the Air Quality permit.
<b>Planned Shutdown or Startup of APC Equipment</b>	<ul style="list-style-type: none"> <li>PIPP Environmental Staff</li> <li>We Energies Environ. Air Quality Manager</li> </ul>	<ul style="list-style-type: none"> <li>MDEQ Marquette — Air Quality</li> </ul>	Verbally inform MDEQ Air Quality group of planned shutdown or startup of air pollution control equipment, including measures taken to minimize the down time of the equipment. Follow up with confirmation letter within five days.
<b>NPDES Permit Effluent Discharge Exceedance</b>	<ul style="list-style-type: none"> <li>We Energies Environ. Water Quality Manager</li> <li>PIPP Environ. Staff</li> </ul>	<ul style="list-style-type: none"> <li>MDEQ Marquette — Water Quality</li> </ul>	Verbally inform MDEQ Water Quality group of NPDES permit exceedance, including duration, material, and follow up action. Follow up with confirmation letter within five days.
<b>Spill or Release</b>	<ul style="list-style-type: none"> <li>PIPP Emergency Coordinator</li> <li>Operating Team Leader</li> </ul>	<ul style="list-style-type: none"> <li>MDEQ Marquette (if available), or</li> <li>MDEQ Spills Hotline</li> </ul>	Accidental spill or release of fuel oil, chemicals, solvents or other hazardous substances or wastes <sup>2</sup>

<sup>2</sup> Plant IPT Leaders and Plant Team Leader 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.



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<b>Action or Condition</b>	<b>Initiator</b>	<b>Recipient</b>	<b>Description</b>
<b>Change in Ownership or Responsible Official</b>	<ul style="list-style-type: none"><li>We Energies Environ. Air Quality Manager</li></ul>	<ul style="list-style-type: none"><li>MDEQ Lansing — Air Quality</li></ul>	Inform MDEQ Air Quality group of any transfer of operation or ownership of the air emission source, or change in Responsible Official.



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**Table 9-3**

**Presque Isle Power Plant  
General and Environmental Community Outreach**  
(During 1999-2002)

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General Community Communication & Outreach	<ul style="list-style-type: none"><li>• General public plant open house and tours</li></ul>
Educational Institutions	<ul style="list-style-type: none"><li>• Northern Michigan University</li><li>• Michigan Technological University</li><li>• University of Guelph</li><li>• Marquette School District</li><li>• Negaunee School District</li><li>• Other local school districts</li></ul>
Environmental	<ul style="list-style-type: none"><li>• 4-H Club — Green Sprouts Program and Junior Master Gardener Project</li><li>• North Country Trail — Multi-use nature trail and cooperative activity across PIPP lands</li><li>• Trees for Tomorrow — Workshop for high school students</li><li>• Ducks Unlimited</li><li>• Moosewood Nature Center</li><li>• Upper Peninsula Recycling Coalition</li></ul>
Specialized Groups	<ul style="list-style-type: none"><li>• Boy Scouts of America, Hiawatha Council</li><li>• Girl Scouts of America, Peninsula Waters Council</li><li>• Young Women in Math and Science</li><li>• Upper Peninsula Childrens Museum –Educational display</li><li>• Noquemanon Cross Country Ski Race</li><li>• Lake Superior Economic Partnership</li></ul>
Agencies (Non-Regulatory Activities)	<ul style="list-style-type: none"><li>• U.S. Forest Service — Native wildflower / greenhouse project</li><li>• U.S. Fish &amp; Wildlife Service</li><li>• Wisconsin Department of Natural Resources — Atmospheric mercury studies</li><li>• Marquette Solid Waste Planning Committee</li><li>• Local Emergency Planning Committee</li><li>• Michigan Business Pollution Prevention Partnership (MBP3)</li></ul>







## 8.3 EMS Procedure for External Communication

A procedure for external 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 External Communication for Joseph's Forklift and Hauling Company's EMS. Also, included in Section 7 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 8.2

### Joseph's Forklift and Hauling Company

#### EMS Procedure No. EMS-7 External Communication

##### I. Purpose

This procedure is to establish and maintain external 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 to the public and regulating agencies.

##### III. Definitions

N/A

##### IV. Procedures

###### A. Identify Communication Methods

Identify external communications for EMS status, environmental status and issues, and public dialog. Include the following types of communications:

- Participation in local action groups that focus on the environment,
- Sponsorship of community events,
- Open house for the community and the families of employees,
- Press releases,
- Hotline for neighbors to call with questions and complaints (odor, noise, etc.) regarding the facility,
- Industry associations,
- Correspondence with the MDEQ and local regulatory agencies.

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

###### B. Primary Contact

The primary contact and originator for external communication is the EMS Manager. In the event the EMS Manager is unavailable, the office administration staff will handle the inquiry.

**V. Records**

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

**VI. Updates and Reviews**

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

**VII. Responsibilities**

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

**VIII. Related Documentation**

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

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## 8.4 External Communication Completion Checklist

### Check Box

- 1. Have you identified what you want to communicate?
- 2. Have you determined who makes up your audience?
- 3. Have you determined how to reach your audience?
- 4. Have you designated a primary contact for external communications?
- 5. Have you written a procedure for external communication for your EMS which includes recording/logging communications?
- 6. Have you established your external communications?

