

**ENVIRONMENTAL MANAGEMENT SYSTEM
 OPERATING PROCEDURE**

Internal and External Communication

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ATTACHMENTS: None

A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish uniform methods for conducting internal communications between various levels and functions within Region 7 related to the Region's environmental management system (EMS) and for conducting similar communications between the Region and its external stakeholders. Per ISO 14004:2004(E), the benefits of effective internal and external communications include:

- Demonstrating the Region's commitment and efforts to improve environmental performance, as well as the results of such efforts; and
- Raising awareness and encouraging dialogue about the Region's environmental policy, environmental performance, and other relevant achievements.

This OP applies to all Region 7 personnel and on-site grantees and contractors.

B. DEFINITIONS

All definitions may be found in the document titled *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* (SHEMS 007.9000.02) contained in the EMS Manual. For the purposes of this OP, the following terms apply:

- Environmentally Preferable
- Environmental Policy
- External Communications
- External Stakeholder
- Facility-Related Goods and Services
- Interested Party
- Internal Communications
- Management Program (MP)
- Senior Management
- Significant Environmental Aspect

C. PROCEDURAL STEPS

1. Internal Communications

Effective internal EMS communications are considered crucial to the effectiveness of the system. These communications serve to encourage individuals who work within the Region to accept the Region's efforts to improve its environmental performance and to motivate them to fulfill their obligations towards achieving the environmental

objectives and targets. Officially, overall responsibility for effective EMS communications rests with the EMS Coordinator; however, from a practical perspective, this responsibility is shared by all within the Region who communicate concerning the EMS – particularly those who work on behalf of the EMS such as members of the EMS Sustainment Team. Everyone who communicates EMS information should keep in mind that the EMS Coordinator generally needs to be aware of all matters involving the EMS to insure proper documentation is obtained and maintained. In some instances after-the-fact notification to the EMS Coordinator of communications may suffice, while in other instances prior concurrence or approval by the EMS Coordinator may be required. There are three primary mechanisms for communicating EMS-related information throughout the Region:

- a. Training. The Region provides employees and on-site contractors and grantees with EMS awareness and/or refresher level training in accordance with the most current version of EMS 006.7210.07, *EMS Awareness and Competency Training*. This training includes information on the Region’s policy, significant aspects, objectives and targets, management programs, and how their activities impact the Region’s environmental performance.
- b. LAN Bulletin Board and Email. These forms of communication are typically used to provide periodic updates and convey time sensitive information relevant to the Region’s EMS. LAN Bulletin Board messages will be developed, reviewed, approved, and posted in accordance with the guidance published on the bulletin board Intranet site. This type of information may also be transmitted via posters/signs placed in various locations around the Region’s facilities and by “pop-ups” that are displayed when someone logs in to the Region’s network. Most of the bulletin board messages, emails, posters/signs, and pop-ups will originate from the EMS Coordinator; those that originate from others who work on the EMS must be coordinated through the EMS Coordinator or their designee prior to distribution.
- c. Internet and Intranet. In accordance with procedures listed in Paragraph 2b below, various EMS-related documents (*i.e.*, the policy statement, EMS OPs, significant aspect lists, and the management programs) are posted to the Internet in order to make them available to external stakeholders. This site will also serve as the primary means for Region 7 staff and on-site grantees and contractors to receive copies of these documents. An Intranet site, part of the Region’s R7@Work site, will also be developed and maintained by the EMS Coordinator to house information, forms, and other materials not suited for inclusion on the Internet site.

2. External Communications

Effective environmental communications are extremely important in fostering mutually affirming and respectful relationships with the Region's partners in the public and private sectors. The Region's Office of Public Affairs (OPA) has overall responsibility for coordinating external communications related to the Region's environmental performance; serving as the official conduit through which all such information flows out from and into the Region subject to the following understandings:

- Unique relationships exist between members of the Region's Senior Management and public and private organizations, as well as with OPA, that allows them to use their discretion in deciding what and how to communicate environmental performance information.
 - The EMS Coordinator maintains working relationships with EPA Headquarters personnel and individuals from other regions within the Agency that may require the frequent exchange of environmental performance information. It is not expected that these exchanges would pass through OPA.
 - Information pertaining to the Region's EMS may be passed to grantees and contractors who work on-site within the Region. It is expected that this information is provided to allow these individuals to participate within the EMS; thus, this information is considered internal communications and is subject to Paragraph C1 above.
- a. Responsive External Communications: It is anticipated that most environmental performance-related information requests received from external stakeholders will be received by OPA. Individuals who receive requests for environmental performance-related information directly from an external stakeholder must forward the request to OPA as soon as possible. Information requests from external stakeholders shall be managed as much as possible through procedures established for specific categories of requests such as the Freedom of Information Act, Congressional correspondence, and other controlled correspondence. OPA will determine who is best qualified to prepare and coordinate the response, track the response coordination process, and ensure the response is provided to the requestor. The EMS Coordinator's involvement may not be needed to respond to some environmental performance-related information requests. In these instances, OPA should provide the Coordinator with a courtesy copy of the response.
- b. Proactive External Communications: Environmental performance-related information could also be provided to external stakeholders through direct mailings, phone calls, email messages, and the Region's Internet site. The EMS Coordinator will maintain an EMS section on the Region's Internet site in order to provide

external stakeholders, as well as Region 7 employees and on-site grantees and contractors, with access to information relevant to the Region's EMS and its environmental performance. This site will include, at a minimum, information in the following areas:

- Environmental Policy and Scope
- Roles and Responsibilities
- Definitions
- Legal and Other Requirements
- Significant Environmental Aspects
- Objectives and Targets
- Management Programs
- Operational Controls
- Training
- Document Control
- Operating Procedures
- Compliance Assessments and Conformance Audits
- Corrective/Preventive Actions
- Management Review

This site will also include basic information on the structure and attributes of an ISO 14001-based EMS and a link to the Headquarters EPA EMS Internet site.

- c. Facility-Related Communications: It is Region 7's policy to influence, to the extent allowed by contracts and/or lease documents, suppliers and on-site contractors who provide facility-related goods and services such that they provide these in a manner that is as protective of the environment as is possible.
- (1) The Facility Manager and EMS Coordinator will ensure the facility owner and their management representative, along with the General Services Administration (GSA) representative (the facility lease holder), are aware of the Region's EMS and its tenants. They will also convey, to the extent allowed by the lease, the Region's preferences for ensuring the facilities are operated, maintained, repaired, and modified in an environmentally preferable manner.
 - (2) The Facility Manager, EMS Coordinator, and applicable Contracting Officers (CO) and Contracting Officer Representatives (COR) will ensure representatives from companies who provide goods and services that interact with the Region's significant environmental aspects are aware of the Region's EMS and its tenants. They will also convey, to the extent allowed by the individual contracts, the Region's preferences for purchased supplies and services to ensure they are as environmentally preferable as practical.

D. RECORDS MANAGEMENT

This OP may require the generation of the following records:

<u>Record</u>	<u>Responsible Person</u>	<u>Record Location</u>
Facility Owner and GSA Discussion Notes	Facility Manager	Facility Manager Office
CO, COR, and Contractor Discussion Notes	Facility Manager	Facility Manager Office

This OP may also result in the creation of additional EMS records. Any records created will be managed in accordance with the most current versions of SHEMS 006.7210.02, *Document Control* and SHEMS 006.7210.17, *Records Management*.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The quality assurance and quality control (QA/QC) success of the internal and external communication process and this OP will be determined through the internal and external EMS conformance audit processes. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of EMS 006.7210.12.

F. REFERENCES

Current versions of the following references are assumed if no date is provided.

1. ISO 14004:2004(E); *Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques*; November 15, 2004
2. US EPA R7, *Document Control*, SHEMS 006.7210.02
3. US EPA R7, *EMS Awareness and Competency Training*, EMS 006.7210.07
4. US EPA R7, *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions*, SHEMS 007.9000.02
5. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 006.7210.12
6. US EPA R7, *Records Management*, SHEMS 006.7210.17
7. Region 7 Order, R VII 5200.3, *Regional Policy for Dealing with Inquiries from State and Congressional Offices*
8. Region 7 Policy, *Freedom of Information Act Procedures*

9. Region 7 Policy, *Controlled Correspondence*