



Title:

**ENVIRONMENTAL, SAFETY, AND
HEALTH COMMUNICATIONS PLAN**

Manual Number:

Manual 450.4-04J

Date of Approval:

07/12/17

Responsible Organization:

LABORATORY OPERATIONS CENTER

Approved by:

Associate Director, Facility Operations

A handwritten signature in blue ink, reading 'Linda S. Kimberley', is positioned below the title 'Associate Director, Facility Operations'.

Corresponding DOE
Directives:

See Section IX

Related NETL
Directives:

**NETL Order 440.1,
ES&H Management
System**

**Form 450.4-13/1,
Documentation and
Tracking of External
Environmental
Correspondence/Inq
uiries**

I. **PURPOSE**

- A. To describe the organizational framework, roles and responsibilities, and strategy for handling environmental, safety, and health (ES&H) communications related to the environmental, safety, and health management system (ES&HMS), as well as NETL's ES&H aspects and impacts, performance, activities, programs, policies, and procedures.

II. **APPLICABILITY**

- A. This manual applies to all employees, research associates, and visitors at NETL.

III. **EXEMPTIONS**

There are no exemptions to this manual.

IV. **DEFINITIONS**

- A. Communications — A system for exchanging information by personal conversation, meetings, mail, telephone, facsimile, electronic mail, intranet, and Internet.
- B. Correspondence — Communication by exchange of letters or other forms of written documentation (e.g., electronic mail or facsimile).
- C. Environmental, Safety, and Health Management System (ES&HMS) — The organizational structure, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining NETL's environmental, safety, and health policy.
- D. External Interested Parties — NETL's off-site stakeholders.
- E. Inquiry — A request from an external interested party for information related to NETL's EMS and/or its ES&H aspects, impacts, performance, activities, programs, policies, and procedures. Inquiries can be conveyed through a variety of communication mechanisms, including via telephone, facsimile, letter, and electronic-mail messaging.
- F. ISM — Integrated safety management.
- G. ISO 14001 — International Organization for Standardization for environmental management systems intended to help organizations control environmental aspects.

- G. OHSAS 18001 — An Occupation Health and Safety Assessment Series for health and safety management systems intended to help organizations control occupational health and safety risks.

V. PROCEDURE

A. Internal Communications Processes

- (1) NETL's intranet/SharePoint site will be the primary internal communication tool.
- (2) The ES&H Team homepage will be used as the primary source of online information related to integrated safety management (ISM) and ES&H processes, documents, and performance.
- (3) NETL employees, contractors, and research associates may communicate ES&H concerns to their supervisors or host, the ES&H Team leads, or anyone in the NETL management.
 - (a) The anonymous on-line employees' concern program is available to all employees, on-site contractors, and research associates. Employees can submit anonymous concerns through this [link](#).
 - (b) All employees, on-site contractors, research associates, and visitors at NETL are expected to report issues that may have impacts on the environment, safety, or health of NETL.
- (4) The ISO 14001/OHSAS 18001 Roadmap will be linked to the ES&H Team homepage and will be used to describe the laboratory's ES&H policy; directives and standards; significant ES&H aspects; assessments; related communications; support documentation; and certification status. This roadmap will provide references to directives addressing communications.
- (5) As appropriate, electronic mail related to ES&H and ISM activities will provide targeted communication to NETL's federal and contractor workforce.
- (6) Periodic meetings will be conducted by the designated ES&HMS representative with the management review board to discuss issues regarding the Management System. The management review team will forward any resulting action items to the appropriate line managers and responsible parties for implementation.
- (7) Line managers, supervisors, and responsible persons will reinforce communications related to ES&H directives and initiatives during group meetings and one-on-one conversations with employees and staff in their charge so that employees and staff have appropriate awareness of how to perform their jobs safely.

- (8) All-employee meetings will be used by the NETL director to routinely address the environmental, safety, and health aspects of NETL's operations. Approved [presentation materials](#) are posted to the NETL intranet for employees to view.

B. External Communications Processes

- (1) NETL's external [Site Environmental Quality](#) webpage will be the primary tool for communicating with external interested parties. The Site Environmental Quality webpage will be used to describe the laboratory's environmental, safety, and health policy and significant environment, safety, and health aspects. This webpage provides information on the Albany site's Groundwater Monitoring Program.
 - (a) On a semi-annual basis, the federal ES&H communications program manager, or designee, will review the webpage to ensure that it is current and accurate. This review will typically be completed prior to each management review team meeting.
 - (b) If modifications are necessary, they will be made by the ES&H communications program manager, or designee, or if another party makes the modifications, they will be provided to the federal ES&H communications program manager or designee prior to posting.
- (2) Correspondence and inquiries from external interested parties (e.g., the public) will include letters, phone calls, personal visits, electronic mail, placements in newspapers or magazines in the geographic vicinity of an NETL project that merit public notice, conference/workshop presentations by NETL staff, and feedback on articles authored by NETL staff in technical journals. This includes contact to any NETL employee or contractor.
 - (a) All ES&H-related inquiries from external parties to any NETL employee or contractor will be referred to NETL's ES&HMS representative.
 - (b) If an interview is requested for an external publication or media-related event, the NETL media and public information manager will coordinate with the ES&HMS representative to determine the appropriate response. If no interview is requested, the ES&HMS representative will assign an individual within the ES&H Team to provide a response.
 - (c) In each instance (except for regulatory-based correspondence), Form 450.4-13/1, Documentation and Tracking of External Environmental Correspondence/Inquiries, will be completed by the ES&HMS representative, the federal ES&H communications program manager, or a designee.
 - (d) Important: Regulatory-based correspondence will be handled via standard protocols for official correspondence, with the NETL official response being archived in the records center.

- (3) NETL will obtain, as appropriate, local community advice relevant to NETL's ES&HMS and related environmental, safety, and health aspects.
- (4) NETL maintains a procedure for handling requests submitted in accordance with the Freedom of Information Act (FOIA). This process is managed by the Office of Chief Counsel and is documented in Procedure 513.1-00.01.
- (5) NETL maintains an emergency response communications process, which is documented in Procedure 151.1-01.01. This process ensures that the appropriate NETL officials properly handle communications related to emergency situations. The process is maintained by the emergency response program manager and the Public Affairs and Strategic Outreach coordinator. The public information officer has the primary responsibility for managing communications during an emergency.
- (6) NETL maintains a system for managing and implementing the requirements of NEPA, which is documented in NETL Manual 451.1-00.01, NEPA Implementation. Specifically, NEPA requires federal agencies to ensure public involvement when the environmental impacts of a federally funded project are being considered. Public involvement may include holding public scoping meetings and public hearings and making documents available in public reading rooms and on websites. The NEPA compliance officer has the primary responsibility for ensuring that these activities are performed by the appropriate NEPA document managers.
- (7) NETL maintains a system for managing and implementing security at the NETL sites, which is documented in NETL Order 470.4, Safeguards and Security Program. While most security issues would be considered as information protected from release to the public or for official use only (OUO), the federal security program manager will coordinate the response to security-related communications.

VI. RESPONSIBILITIES

A. ES&HMS Representative, or Designee

- (1) Periodically hold meetings with the ES&H program managers to provide general guidance and a forum to discuss issues.
- (2) Address specific ES&H and ES&HMS correspondence and inquiries from external parties, including participating in interviews, as appropriate.
- (3) Complete, or designate someone else to complete, Form 450.4-13/1, Documentation and Tracking of External Environmental Correspondence/Inquiries, for all communications with external interested parties (e.g., the public) and archive the form in the records center.
- (4) Archive official regulatory correspondence in the records center.

- (5) Meet with NETL's management review team on a semi-annual basis to present issues regarding the ES&HMS.

B. ES&H Communications Program Manager

- (1) Review and approve all information posted to the ES&H Team webpage on NETL's intranet and the Site Environmental Quality webpage on NETL's external website.
- (2) Oversee the maintenance of the ES&HMS roadmap as part of conformance with the ISO 14001 and OHSAS 18001 standards.
- (3) Complete [NETL Form 450.4-13/1, Documentation and Tracking of External Environmental Correspondence/Inquiries](#), for communications with external interested parties referred by the ES&H Team Leads and archive the form in the record center.
- (4) Act as a representative on ES&H communications issues.

C. Director, Public Affairs and Strategic Outreach

- (1) Designate an emergency public information officer to interact with the public and media on emergency response issues.
- (2) Designate a media and public information manager to coordinate ES&H media inquiries.

D. Emergency Public Information Officer

- (1) Coordinate with the emergency response program manager during a site emergency.
- (2) Have primary responsibility for managing the communication functions during a site emergency.

E. Media and Public Information Manager

- (1) Coordinate with the ES&HMS representative in the handling of all ES&H media inquiries.
- (2) Arrange for interviews, as appropriate.

F. FOIA Officer

- (1) Handle all requests submitted in accordance with the Freedom of Information Act.

G. NEPA Compliance Officer/s

- (1) Maintain NETL's system for NEPA implementation.
- (2) Coordinate with the NEPA document managers to ensure that public involvement and document availability requirements associated with NEPA are met.

H. ES&H Program Managers

- (1) Use feedback to develop and implement corrective and improvement actions in their assigned ES&H programs.

I. Line Manager/s and Responsible Person/s

- (1) Inform and reinforce communications related to ES&H issues to employees, contractors, and research associates.
- (2) Collect feedback from employees and other parties and pass along to the appropriate ES&H program manager.

J. Employees (Federal, Contractor, Research Associate, or Visitor)

- (1) Consult intranet, supervisor, host, etc., for the ES&H information.
- (2) Follow ES&H instructions.
- (3) Provide feedback to the appropriate parties using available resources.

VII. TRAINING

NONE

VIII. RECORD CONTROL

- A. [NETL Form 450.4-13/1, Documentation and Tracking of External Environmental Correspondence/Inquiries](#) are ES&H records. All ES&H communications records will be retained according to the DOE Environmental Records Schedule, Item 2(a) (3) (b). Destroy 75 years after action is taken (N1-434-98-28).

IX. REFERENCES

- A. NETL Operating Plan 151.1-01, [Comprehensive Emergency Management System](#).
- B. NETL Manual 151.1-01.01, [Emergency Preparedness Drills and Exercises](#).

- C. NETL Procedure 202.1-00.06, [Intranet Content Creation, Review, and Update](#).
- D. NETL Manual 442.1-00.01, [Employee Concerns Program](#).
- E. NETL Procedure 451.1-00.01, [NEPA Implementation](#)
- F. NETL Procedure 513.1-00.01, [Freedom of Information Act \(FOIA\) Requests](#).
- G. [NETL's external website](#).

10. **REVISION HISTORY**

VERSION	DATE	SUMMARY OF CHANGES
P 450.4-13	8/16/01	To describe the process for receiving, documenting, and responding to relevant correspondence and inquiries from external interested parties regarding NETL's environmental management system and/or its ES&H aspects and impacts, performance, activities, programs, policies, and procedures. This process will guide an NETL employee who receives ES&H-related correspondence or inquiries to the appropriate NETL person for responding. For communications required and generated under the National Environmental Policy Act (NEPA) process, please refer to the specific NEPA directives (NETL Operating Plan 451.1-1, NETL Management of NEPA Requirements, and NETL Procedure 451.1-1, NETL NEPA Implementation).
P 450.4-13A	12/19/01	These revisions include describing internal mechanisms for communicating NETL's environmental management system (EMS) information to NETL employees and an elaboration of processes for external EMS communications.
O 450.4-4	1/31/03	To describe the organizational framework, roles and responsibilities, and strategy for handling environment, safety, and health (ES&H) communications. This plan addresses both internal and external communications related to NETL's environmental management system (EMS) and its environment, safety, and health (ES&H) aspects and impacts, performance, activities, programs, policies, and procedures.
O 450.4-4A	5/29/03	The operating plan has been modified to delineate the roles of the ES&H division director, EMS representative, and communications program manager in dealing with external inquiries, and to define the two grapevine systems, the grapevine system for all issues and the ES&H grapevine system.
O 450.4-4B	11/5/03	The reference to the "roadmap to EMS documentation" was moved from external communications processes to internal communications processes and a description of the information contained on NETL's external webpage for ISO 14001 has been added. In addition, the operating plan also has been modified based on current site-wide security measures. This particular revision removes the requirement to convene open-forum community interest group meetings.
O 450.4-4C	6/7/04	The responsibilities of the ES&H division director have been modified to reflect that the division director serves as a member of site-wide ES&H committee rather than chairperson.

VERSION	DATE	SUMMARY OF CHANGES
O 450.4-4D	1/19/05	Changes were made to indicate that the ES&H communications manager is a federal position. Additional changes were made to reinforce this change. In addition, information was added regarding the role of the NEPA document manager. Other titles and office name changes were also made.
O 450.4-4E	7/21/06	Changes were made regarding external ES&H communications, in particular, the information related to ISO 14001 webpage on NETL's external website. These included renaming the webpage as the Site Environmental Quality webpage and outlining the procedure used to update the webpage. Additional changes were made to eliminate references that are no longer used in or relevant to the plan, as well as eliminating the grapevine and the ES&H grapevine and adding "Frequently Asked Questions."
O 450.4-4F	7/10/07	Changes were made regarding external ES&H communications; in the information related to ISO 14001 webpage on NETL's external website. These included adding information about conformance with the Occupation Health and Safety Assessment Series (OHSAS 18001) and to incorporate communication requirements related to the Albany site. In addition, changes were made to incorporate safety management system requirements into the plan.
O 450.4-4G	8/27/09	The plan was modified to change references to the Environment, Safety, and Health Division to the Environment, Safety, Security, and Health Division. References to the Albany Management System, the Frequently Asked Questions page, and the Continuous Improvement Process were deleted, since they no longer exist, and a finding concerning the need to get local community advice relevant to the EMS, as appropriate, was also addressed.
O 450.4-4H	8/13/12	Changes include combining the environmental management system and the safety management system into the environmental, safety, and health management system.
O 450.4-04I	12/13/13	Changes were made to address making NETL employees and contractors aware of the requirement concerning documentation of external interactions.
M 450.4-04G	07/ /17	Operating Plan was converted to a manual and changes were made to address finding within AIIS, regarding links to directives and the form.