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GDF SUEZ

Appendix 10.

Communications Procedure

Reference: HCF Procedure A-29

	Environmental Procedure	Number: A-29	Date: August 3, 2004 R-July 20, 2006
		Revision Number: 01	Approval: Charles Davis
		Title: Communications Procedure	Author: Harry C. Barnes Jr.

Communications Procedure

1.0 **Purpose:**

The purpose of this procedure is to provide a system and instructions of how communications both internal and external are conducted at Hopewell Cogeneration Facility. This is in order to conform to a specific way of performing the communications activities.

2.0 **Scope:**

This procedure covers all communications activities associated with Hopewell Cogeneration Facility. And comply with directives from Suez Energy Generation NA (SAP's)

3.0 **Reference Documents:**

Document Name

ANSI/ISO 14001-2004 section 4.4.3 Communications
SAP – 018 Records and Files
SAP – 041 Environmental Communications
A-27 Program Revision Procedures

4.0 **Procedure (General):**

- 4.1 The Hopewell Cogeneration Facility (HCF) uses a number of mechanisms to ensure effective communication with interested parties. These mechanisms include regulatory filings (such as permits, applications and reports), informational meetings and briefings, through Suez's Web Site, press releases, public meetings, plant tours and conferences.

Inquiries and other communications (received by mail, email, fax, telephone, or in person) from external or internal parties concerning HCF's environmental performance may be received by a number of HCF representatives. Written communications on EMS matters are maintained under the HCF document control system and filed in HCF's environmental files (14.0). HCF respects the views of interested parties on its EMS; its environmental performance and other related matters. Responses to these matters are normally handled on the plant level with conference with SUEZ Environmental and SUEZ Public Relations.

5.0 **Procedure (External Communication):**

- 5.1 All inquiries/communications regarding HCF's EMS program shall be referred to the Technical Support Supervisor, the Environmental Site Representative who will use Ciber-Regs for tracking, resolution, and retention as EMS records.
- 5.2 General rules for external communication require that the information provided by the organization be understandable and adequately explained to the recipients and presents an accurate and verifiable picture of the organization and its EMS, its environmental performance or other related matters. Outreach is conducted after achieving milestones during EMS development or when considering changes at the facility that could have potential environmental impacts.

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5.3 For outside communications the following information should be taken from the caller:

- 5.3.1 Tactfully be sure that they have the correct plant.
- 5.3.2 The Compliant or Request for Information
- 5.3.3 Caller's Name
- 5.3.4 Caller's Address
- 5.3.5 Caller's Phone Number
- 5.3.6 Caller's Fax Number (optional)
- 5.3.7 Caller's e-mail Address (optional)
- 5.3.8 Caller's Affiliation (Are they with the Serra Club, another power plant, one of the other plants in Hopewell, or just a concerned citizen)

5.4 Hopewell Cogeneration Facility will give out Environmental, Safety, and Plant Information after the following considerations are taken into account:

- 5.4.1 Plant and Local Security
- 5.4.2 Economic advantage to be gained by other companies
- 5.4.3 Information that would misrepresent the Plant and or Company

6.0 Procedure (Internal Communication):

- 6.1 HCF utilizes a variety of methods to communicate EMS protocols internally including LAN postings; emails; bulletin board postings; staff/shift meetings, and training meetings. General rules for internal communications require that the information provided be understandable and adequately explained to the recipients while presenting an accurate and verifiable picture of HCF and its EMS, its environmental performance or other related matters.
- 6.2 Ongoing EMS communications are conducted by emails, phone, memos, and at EMS meetings and ensures appropriate responses for the various levels of HCF's operations.
- 6.3 For longer retention two databases have been established. For general information an Interim Operating Guideline database was setup. For specific Environmental information an EMS Communications Log database was setup.
- 6.4 To aid with plant communications an update of EMS will be presented at the Steering Committee Meetings.
- 6.5 An Environmental Bulletin Board will also be used to track Objectives and Targets as well as any information.

7.0 Roles and Responsibilities:

- 7.1 This is the responsibility of the Site Environmental Representative or their designee.

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8.0 Attachments:

- 8.1 Complaint or Request for Information Form
- 8.2 Change of Procedure Form

9.0 Distribution:

- 9.1 In the computer under Z:\company\Public\EMS\Procedures\A-29 Communication Procedure.doc
- 9.2 In the control room in the procedure Books under A-29 Communication Procedure.
- 9.3 EMS manual in Safety and Environmental office Tab 10

10.0 Revision/Review History:

Revision/Review	Editor	Edit Date
R-01	Chuck Barnes	7/20/06
Review	Chuck Barnes	4/2/07
Review	Chuck Barnes	3/14/08
Review	Taylor Dunford	8/15/08
Review	Chuck Barnes	7/16/09
Review	Chuck Barnes	9/7/2010
Review & Update	Chuck Barnes	2/25/2011

As of 2010 Procedure and Checklist Reviews will be conducted every other year; the even numbered procedures/checklist on the even years and the others on the odd years. Updates and Revisions should be done soon after the change has been made.

