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Division of Operations Environmental Implementation Procedure  
Bureau: Highway Maintenance

Date: 5/4/17

**Procedure EIP-8**  
**Internal and External Communication and Reporting**

Revision: 3.2

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**PURPOSE:**

The purpose of this Environmental Implementation Procedure (EIP) is to establish, maintain, and document a program for internal and external communications related to NHDOT's environmental performance, legal and regulatory compliance, environmental incidents occurring at NHDOT facilities and EMS status.

**RESPONSIBILITY:**

Commissioner/ Division Director:

- Ensure Department policies, and directives are clearly and appropriately communicated to Bureaus.
- Advocate and provide direction for effective communications among appropriate levels of Department staff, contractors, suppliers, regulatory agencies, and external stakeholders.
- Review and approve annual reporting to external parties including administrative order of consent (AOC) required reporting

Office of Stewardship and Compliance (OSC):

- Communicate new regulatory and policy information to Bureaus.
- Develop and implement a plan for annual reporting to internal and external parties including administrative order of consent (AOC) required reporting.

Director/Bureau Administrator:

- Advocate effective communications among appropriate levels of Bureau staff, Bureau contractors, suppliers, regulatory agencies, and external stakeholders.
- Respond to inquiries or complaints received from regulatory agencies, the public and stakeholders when necessary.
- Encourage all employees to provide feedback and recommendations related to environmental performance and EMS.

Bureau EMS Coordinator:

- Develop a Bureau Environmental Communications Plan with the Bureau EMS Team.
- Evaluate and address feedback, recommendations, and concerns brought forward by District Engineers, Bureau Administrator, bureau employees, contractors, suppliers, regulatory agencies, and external stakeholders.
- Respond to inquiries and communicate NHDOT environmental information to external parties including stakeholders and the public.



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- Coordinate with OSC, Bureau Administrator, and involved District Engineer/Designee, to disseminate information to internal and external parties about EMS implementation status and progress.

**Bureau Safety & Environmental Coordinator/Bureau EMS Team:**

- Participate in the development of the Bureau Environmental Communications Plan.
- Track, and maintain a file of, all internal and external communications related to the applicable District's environmental performance, legal and regulatory compliance, environmental incidents occurring at NHDOT facilities and EMS status.

**Bureau Employees:**

- Communicate environmental concerns, problems, and suggestions to Bureau Management and Bureau EMS Team.
- Relay environmental related public inquiries received during the course of work to Bureau Management and Bureau EMS Team.

**DOCUMENTS AND RECORDS:**

- EIP-8-Form 8a Communication Plan Matrix
- EIP-8-Form 8b Environmental Event Log
- EIP-6-Form-6c Contractor Safety & Environmental ChecklistEIP-8-Form 8b External Communications Log
- EIP-9-Form 9b Environmental Records List
- District Environmental Files

**PROCEDURE:**

1. Outline of specific strategies for:

**Internal Communications**

The Director, Bureau Administrator, OSC, and Bureau EMS Coordinator develop this strategy collectively. Topics to be communicated internally may include:

- The Environmental Policy.
- Each Bureau's significant aspects and impacts, current objectives and targets, and progress toward their implementation.
- Operational control procedures and work instructions related to EMS.



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- Legal and regulatory requirements and the potential consequences of regulatory noncompliance.
- Pollution prevention policies and initiatives.
- Employee reporting of environmental concerns and suggestions for improvement.

The level of internal communication and understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities.

**Communications external to NHDOT**

The Director, Bureau Administrator, OSC, and Public Information Officer develop this strategy collectively. Topics to communicate externally may include:

- The Environmental Policy.
- Information about NHDOT environmental performance.
- Environmental Records List (see EIP-9-Form 9b)
- Pollution prevention policies and initiatives.
- Legal and regulatory requirements, compliance status, regulatory reporting, and the annual report required by Administrative Order of Consent.
- Complaints from the public, inquiries, and inspections from regulatory agencies.

**Communications with Contractors and suppliers**

OSC and the Bureau EMS Team develop this strategy collectively. Topics to be communicated may include:

- The Environmental Policy and NHDOT environmental performance expectations.
- Legal and regulatory requirements related to contractor/supplier activities.
- Pollution prevention policies and initiatives affecting contractor/supplier activities.
- Reporting of environmental concerns and setbacks within NHDOT facility properties (e.g. contractor-caused spills).

The level of communication is commensurate with type of service and activity on Bureau facilities.

2. OSC and/or the Bureau EMS Team shall define the target audience(s) for each type of information communicated.



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- 3. The Bureau EMS Team determines the preferred modes of communication for each element in the Communication Plan Matrix. These may include email communications, bulletin board postings, intranet and internet communications, written or verbal communications, formal and informal training sessions, on-the-job coaching, and contract language.
- 4. The Bureau will respond to external inquiries and complaints in a timely manner.
- 5. The Bureau uses and maintains The Environmental Event Log (EIP8-Form 8b) in each district to indicate the status and location of files containing e-mail or written communications regarding public and stakeholder inquiries, complaints, and document any other related communications. The status of each issue shall be monitored until the issue is sufficiently resolved.
- 6. The Bureau EMS Coordinator and District Safety & Environmental Coordinator maintain all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.

<p>Approved: </p> <hr/> <p>Name</p> <p>STATE MAINT EMS</p> <hr/> <p>Title</p> <p>Date 10/4/17</p> <hr/>	<p>Revision #: <u>3.2</u></p> <p>Revision Date: <u>5/4/2017</u></p> <p>Supersedes Revision #: <u>3.1</u></p>
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