

**BMP Element 9 — Communication**  
**City of Richmond Public Utilities – Wastewater Treatment**

Date of Last Review 09/30/11	Revision 9	Revised By Biosolids Team	Revision Date 09/26/11	Supersedes all previous versions
		Approved By Biosolids Supervisor	Approval Date 09/30/11	

**Purpose**

The purpose of this procedure is to describe the communication and public outreach program surrounding the City’s Biosolids Management Program.

**Scope**

This element applies to all communication concerning the biosolids value chain and all BMP elements.

**Responsible Staff**

The Deputy Director II, Biosolids Supervisor, Utility Plant Superintendents I & II, Public Information Manager, Department of Information Technology, Environmental Compliance Officer, Administrative Program Support Assistant, and hauling/land application contractor are primarily responsible for communication.

**Procedure**

The Public Information Manager is responsible for the process of reviewing and updating the City’s website.

Communication and public outreach may be achieved as described below.

1. Public participation in planning is also listed in BMP Element 6 and reference should be made to these items. Element 6 also describes how the interested party list is generated and maintained. Public meetings are scheduled to address any concerns.
2. General regulatory and legal information is available to the public on the city’s website. A pamphlet printed by the National Biosolids Partnership (NBP) is available to provide information on biosolids.

3. The City's Public Information Manager will issue press releases as appropriate, regarding developments in the City's BMP. Completion of key BMP stages, including completion of a third-party audit and attainment of BMP certification, will result in press releases to update the public on the City's BMP.
4. City of Richmond staff will promote the biosolids program through tours of the WWTP, targeting the general public and/or specific school, industrial, and business sectors.
5. Staff maintains records of all public outreach including presentations, facility tours, and/or public meetings. Records of attendees are used to update the active list of interested parties.
6. Internal communication is critical to facilitate effective biosolids treatment, transfer, biosolids application, and compliance with regulations. The key treatment sections are listed below, with critical communication pathways noted.
  - A. Pretreatment (Environmental Compliance)
    - (1) Pretreatment informs WWTP staff and the Biosolids Supervisor of new industries that could affect the treatment system and/or biosolids.
    - (2) Pretreatment informs WWTP staff and the Biosolids Supervisor of industrial problems and high influent samples.
    - (3) Pretreatment informs WWTP staff and the Biosolids Supervisor of changes in metals loading and changes in local limits.
  - B. Operations
    - (1) WWTP staff informs pretreatment of plant problems or upsets that could have been caused by industrial discharges.
    - (2) WWTP staff informs the Biosolids Supervisor of any problems or changes regarding quality of digested biosolids, as well as fluctuations in quantity of biosolids generated.
    - (3) WWTP staff informs the Biosolids Supervisor and pretreatment of major maintenance items scheduled, including digester cleaning, clarifier takedowns, or other items that could affect treatment plant operations.
  - C. Biosolids Supervisor
    - (1) Biosolids Supervisor informs WWTP staff and pretreatment of any changes in biosolids quality, including odor, appearance, solids concentrations, or regulated test parameters.
    - (2) Biosolids Supervisor informs WWTP staff of any problems with application sites, (e.g., loss of sites, complaints from the public or farm owners).
7. Internal communication with employees in the biosolids value chain also provides input on the BMP.

- A. Communication to biosolids value chain employees includes regular training on the City's current biosolids policy, legal and other regulatory requirements, and on other issues relevant to biosolids. Training is fully addressed in Element 8.
  - B. Biosolids value chain employees receive other biosolids related information at regularly scheduled staff meetings and other means of communication.
  - C. The BMP Team also seeks input from biosolids value chain employees on the BMP including the BMP manual, biosolids goals and objectives, and internal audit procedures.
8. The City's biosolids policy will be communicated to value chain staff through presentations at staff meetings, utility review, on signs placed throughout the workplace, and regular BMP training. For more information on the City's biosolids policy, see Element 2.
  9. To ensure interested parties become familiar with the biosolids policy, it is posted on the City's biosolids website, and included in presentations on the City's biosolids program.
  10. The hauling/land application contractor is responsible for communicating the City's biosolids policy to it staff and subcontractors. It also will respond in writing to all questions from regulatory agencies and site owners and will supply the City with copies of all related correspondence. The contractor also communicates with interested parties during the course of its operations, at industry, state, and local events, during permit hearings, and through its membership in the Virginia Biosolids Council, among other venues.
  11. The following methods will be used to communicate with interested parties:
    - A. The City's webpage
    - B. Tours of the WWTP
    - C. Correspondence with regulatory and state, city, and county officials
    - D. Annual biosolids report to Virginia Department of Environmental Quality (DEQ) and Environmental Protection Agency (EPA).
    - E. Annual Biosolids Management Program Performance Report (BMPPR)
    - F. Through its relationship with the hauling/land application contractor.
    - G. Face book, blog and Tweets

12. Third-party audit results will be made available to the public primarily through the City's website. A summary as well as the full audit report will be posted on the website as soon as they are made available to the City. The Public Information Manager will provide a press release announcing the availability of the third-party audit results.