

BIOSOLIDS EMS — ELEMENT 9.0

COMMUNICATIONS & PUBLIC OUTREACH



REVISION	EFFECTIVE DATE	APPROVAL SIGNATURE
16	10/06/2021	

PURPOSE

A Biosolids Management Program that is accepted and supported by the public, depends on the effective flow of information between the biosolids organization and interested parties. Access to information about biosolids management activities and goals can significantly reduce public perceptions of risk. Furthermore, employees and contractors need certain information to perform their jobs in a safe and environmentally sound manner. Program procedures must communicate relevant information about biosolids management activities, policies and goals to employees and contractors, consistent with assigned roles and responsibilities. Established procedures must also describe how to establish and maintain a proactive Communications Program that provides critical information and timely response to inquiries and complaints from interested parties. Element 9.0 outlines the standard operating procedures and work management practices used to accomplish these Communication and Public Outreach objectives for the benefit of all employees, contractors and interested parties.

SCOPE

This document applies to all communication concerning the biosolids value chain and EMS elements.

KEY WORDS

- Internal Communication
- External Communication
- City Employees
- Contractors
- Interested Parties

RESPONSIBILITY

The following individuals are responsible for developing and implementing clear and concise procedures for effective internal and external communication within the biosolids beneficial reuse/recycling program: Assistant Director (Plant Operations), Media Relations and Communications Coordinator, Biosolids EMS Manager, Biosolids EMS Coordinator and the Biosolids Manager (Contractor). In addition, all EMS Team members, VCWRF staff and City contractors are encouraged to provide suggestions that will improve communications and public outreach within the biosolids value chain.

PROCEDURE

Internal Communication

In order to inform employees of changes in policies, procedures, regulations, legal requirements and other important matters, the City promotes an open and effective communication process within and between divisions and departments within the City.

Information is exchanged between City personnel using the following methods:

- Phone calls
- Letters, memorandums, faxes and email
- Staff meetings
- Presentations
- Internal Newsletters
- City Intranet
- Updates To The City website

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Interactive, internal communication is also used to convey key information between the City and the Biosolids Contractor. The City's Biosolids EMS Manager administers the biosolids contract and is in direct contact with the Biosolids Contractor (Manager) on a daily basis. In addition to phone, email, fax and letter correspondence, staff meetings are an important means to exchange internal information, update procedures and document courses of action.

- **Monthly Biosolids O&M Meetings**

The City conducts regularly monthly scheduled operation and maintenance (O&M) meetings with the Biosolids Contractor, as needed. Attendees discuss program activities such as O&M issues, land application schedules, odor complaints, upcoming meetings, and any outstanding issues associated with O&M and land application activities. During each meeting the Biosolids Contractor presents a copy of the Monthly Invoice and O&M Report detailing biosolids related activities. A copy of each monthly report is maintained on File by the City.

External Communication

External communication is the conveyance of internal information to an external audience, and is used by the City of Fort Worth and Biosolids Contractor to inform interested parties of current Biosolids Program activities and goals. The City and Biosolids Contractor use the following methods to promote a dialogue of interactive two-way communication:

- **Phone Calls**

The Biosolids EMS Manager (City) and the Biosolids Manager (Contractor) are responsible for ensuring that designated staff members are available at all times to receive phone calls. The Biosolids EMS Coordinator maintains a list of important phone numbers for the Water Department, the Biosolids Contractor, and other agencies, as necessary to facilitate communication.

- **City of Fort Worth Website (<http://fortworthtexas.gov/water/>)**

The Communications and Public Engagement office maintains and manages content on the city's website to provide the public with accurate and current information regarding the Water Department's biosolids program. The City of Fort Worth's EMS Manual, Annual Performance Reports, upcoming audit information and audit results are posted on the website for interested parties to review. Information regarding environmental health and safety is also included to address common questions and concerns (e.g. odors, stormwater runoff, monitoring requirements) regarding the land application of biosolids.

- **City of Fort Worth Biosolids Email (biosolids@fortworthtexas.gov)**

The biosolids email address was created to promptly direct inquiries and complaints from the website to City personnel regarding the land application of biosolids. As discussed in Element 6.0, timely response to complaints, questions, and comments about biosolids is a critical aspect of the City's Communication and Public Outreach Program.

Biosolids Complaints and Requests for Information

The Biosolids Contractor is actively involved with City personnel in responding to biosolids complaints and requests for information (Refer to Element 6.0 and 7.0). Information obtained from complaints are shared between City personnel and the Biosolids Contractor. For complaints received by the Biosolids Contractor, the resulting complaint information shall be forwarded to the City *by the end of the business day*. The approved procedures for addressing biosolids complaints and requests for information provide valuable public feedback and function as a tool to record historical data for future reference (Refer to Appendix 9.A in this element and City SOPs BSLD 7.001 and 7.002).

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Both the City and the Biosolids Contractor maintain complaint forms to record, track and log information about specific issues of concern, contact information for the complainant and any responses or corrective actions needed to appropriately resolve the matter. For the City, all complaint information will be recorded in the Biosolids Complaint Log and used to complete a Biosolids Complaint Form.

The Biosolids Contractor is responsible for contacting each complainant to understand the root cause of the issue/problem. This shall be done by phone, email, or written correspondence as soon as practicable but no later than one business day after the complaint is received. The Biosolids Contractor, in consultation with the City as necessary, will evaluate if any corrective actions are feasible and necessary to address the problem in a timely manner. The Biosolids Contractor shall notify the complainant of any corrective actions that have been or will be implemented.

Public information requests will be evaluated by the EMS Manager and the Biosolids Manager (Contractor) to determine if the inquiry needs to be handled as a formal records request. Such requests will be processed by the City Secretary's Office according to established procedures.

Regulatory/Environmental Compliance and Outreach

One important aspect of the Biosolids Management Program for the City of Fort Worth is compliance with all federal, state and local regulations. The Regulatory/Environmental Administrator, Biosolids EMS Manager and Biosolids EMS Coordinator are responsible for tracking the current regulatory requirements that apply to biosolids production and disposal, such as beneficial reuse through land application (refer to Element 4.0). In addition, City employees are encouraged to provide regulatory information they have obtained (from professional organizations, such as the Water Environment Federation (WEF), American Water Works Association (AWWA), Water Environment Associate of Texas (WEAT), contacts at local regulatory agencies, contractors and vendors, etc.) to the Water Department's Regulatory/Environmental Administrator for review and comment.

Other City of Fort Worth departments are also involved in regulatory compliance and outreach efforts that affect the production and management of biosolids. The Pretreatment Services Department works closely with the Biosolids Management Division to permit commercial and industrial discharges into the wastewater system and to enforce water quality limits. The Pretreatment Program is designed to protect the wastewater infrastructure and the health of employees at the Village Creek Water Reclamation Facility (VCWRF). Pretreatment standards reduce conventional and toxic pollutant levels discharged by industries and other nondomestic wastewater sources into the municipal sewer system and the environment.

One of the most effective ways that the City of Fort Worth communicates the importance of ongoing compliance with water quality and environmental standards is through the Annual Awards Luncheon. The Pretreatment Services Department uses this event to publically recognize local commercial and industrial facilities that consistently prevent or remove harmful pollutants (including oil and grease) from their processes, before they are discharged to the City's sewer system.

- **Industry Compliance Awards**

Awards for compliance with environmental ordinances and pollution prevention are presented to qualifying businesses as follows:

- Pretreatment Star Award— 1 year of 100% compliance
- Pretreatment Associate Award— 2 years of 100% compliance
- Pretreatment Partnership Award— 3-10 years of 100% compliance
- Pretreatment Stewardship Award— 11+ years of 100% compliance

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- Pretreatment Pollution Prevention Award—significant strides in pollution prevention
 - Pretreatment Industry of the Year Award-- 5 or more years of consistent compliance and significant pollution prevention activities.

Additional public outreach and pollution control efforts that support the Biosolids Management Program include the following:

- **Information Clearinghouse** This program provides information on a variety of pollution prevention opportunities for the City's Significant Industrial Users and other interested parties. The information includes surveys, permit applications and inspections, EPA Pollution Prevention Guidance manuals for specific industry types, case studies, websites, and videos. The TCEQ Office of Small Business and Local Government Assistance (TexasEnviroHelp) also provides resources specifically tailored to help small businesses and local governments comply with environmental air, water and waste regulations (<https://www.tceq.texas.gov/assistance>).
- **Pretreatment/Pollution Prevention Incorporated Into The Annual Inspection**
The City of Fort Worth incorporates pollution prevention as part of the annual Significant Industrial User (SIU) pretreatment inspections. This program was jointly developed by Pretreatment Services and the TCEQ.
- **Outreach Efforts Regarding Grease for Residential Communities**
Door hangers are distributed to residential communities to provide information regarding proper grease disposal and to encourage residents to adopt Best Management Practices that can help minimize sanitary sewer overflows.
- **Outreach Efforts to New and Change of Ownership Food Establishments**
The City extends public outreach activities to food service establishments (FSEs) for grease abatement training. The City inspects and permits food service establishments to determine the necessary size and pumping frequency of grease traps. Information regarding proper grease disposal is distributed with each permit, to new and change-of-ownership FSEs.
- **Environmental Collection Center**
The City encourages residents in Fort Worth and participating cities to bring household hazardous wastes to the collection centers. The City recycles useable items (grease, paint, metals, etc.) to eliminate waste and reduce disposal costs.
- **Take Back Meds Program**
Each year, The City of Fort Worth sponsors Take Back Meds Events (In Spring and Fall) that provide a safe and environmentally-conscious method for disposal of unwanted pharmaceutical products and medications. Locations are also available throughout the City year round for product drop-off. Acceptable items include prescription, over-the-counter and veterinary medications, vitamins, supplements and minerals.

Biosolids Communication Plan

In spring 2018, a Biosolids Communication Plan was drafted to introduce the public to the importance of the beneficial reuse process and to correct misinformation regarding the safety and environmental impact of biosolids. The Biosolids Communication Plan includes strategies for public outreach, which includes the use of informational videos, social media platforms, City website updates, facility tours, and translation of biosolids information into Spanish for people and communities with limited English proficiency.

Public Outreach Program

The City and the Biosolids Contractor take an active role in public participation and communication with interested parties, as discussed in EMS Element 6.0-Public Participation. The Biosolids Communications Program provides relevant information consistent with local circumstances, methods of biosolids management, public communications history, and degree of current interest in biosolids management activities. Specific projects are tracked and recorded in a "Public Outreach Activities" binder located in the office of the Biosolids Public Outreach

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Coordinator. Annually (end of the TPDES Sludge Year on July 31st), the activities will be enumerated and summarized, with the summary sheet going into the “Public Outreach Activities” binder. The following are activities that fall under public outreach:

- **Facility Tours**

Village Creek Water Reclamation Facility (VCWRF) staff and the Biosolids Contractor offer facility tours to the public upon request. Tours may be customized for specific groups, including school children and university students. A Biosolids Survey is used to obtain opinions and feedback regarding biosolids from tour participants. A tour handout provides attendees with an overview of the VCWRF treatment processes and how biosolids are beneficially recycled for use in land application.

- **Brochures, Pamphlets and Posters**

A biosolids brochure has been developed for use at outreach events and facility tours. The target audience of the brochure are VCWRF tour groups, residents of customer cities, the general public, and other interested parties. Pamphlets and posters may also be utilized to communicate important information during public events and activities.

- **Frequently Asked Questions (FAQ) With QR Code**

An FAQ sheet is distributed to interested parties via an infotube attached to signs posted at land application sites. The FAQ sheet and the notification signs also contain a QR code that may be scanned to access a feedback survey. The target audience of the FAQ and QR code is citizens who live near sites where biosolids are beneficially reused.

- **About Biosolids Handout**

An “About Biosolids” handout was developed as supplemental material to provide interesting and relevant information that is not included in the FAQ sheet or biosolids brochure. The target audience is the general public attending City outreach events, such as the Earth Day Festival. The “About Biosolids” handout may be posted on the City’s website and used in social media posts, with a link leading back to the City’s biosolids webpages. In addition, a reference list of scientific journal articles supporting the benefits and safety of beneficial reuse of biosolids is available on the City’s website and may also be requested via email.

- **Water Department Social Media Platforms**

Social media posts about biosolids provide a mechanism to share biosolids information with interested parties, initiate conversations, engage with site users, respond to comments, and evaluate the impact of content on the target audience.

- **News Releases**

The Water Department may periodically provide biosolids information to news outlets to notify the public about important program developments and upcoming events. A well-written news release offers reporters something interesting and timely to share with audiences, and may help populate search engines that direct visitors to the City’s website for additional information.

- **Public Meetings**

Presentations and on-on-one meetings are another opportunity to provide factual biosolids information, encourage feedback, and maintain a fair, open and respectful forum for interested parties to comment.

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REFERENCES

- BMP Guidance Manual, (NBP, June 2011)
- Code of Good Practice, (NBP, June 2011)
- Manual of Good Practice for Biosolids, (NBP, June 2011)
- Public Outreach Activities Binder
- City of Fort Worth Water Department website: <http://www.fortworthgov.org/water>

EMS Cross References:

- Element 4.0 Legal and Other Requirements
- Element 6.0 Public Participation in Planning
- Element 7.0 Roles and Responsibilities
- Element 12.0 Documentation and Document Control

ATTACHMENTS

- Appendix 9.A
- Biosolids Complaint Form
- Biosolids Complaint Log
- Tour handout
- Biosolids Brochure
- Biosolids FAQ
- Tour Survey

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REVISION HISTORY

Revision #	Date	Revision Description
16	10/06/2021	Update to Purpose, Responsibility, Procedure, Internal and External Communication, Regulatory Communication, Public Outreach and Attachment sections, removed Field Observation Report Forms and Close-out Site Visit Form
15	10/15/2020	Update to Public Outreach Program and Attachments sections
14	03/31/2020	Update to Procedure section
13	09/26/2018	Update to Responsibility and Procedure sections
12	08/03/2016	Merged element to new format, updated Public Outreach Program, updated attachments
11	10/06/2014	Referred to SOPs BSLD 07.001 and 07.002 under Biosolids Complaints and Requests for Information section.
10	02/17/2014	Procedure updated to include new biosolids@fortworthtexas.gov address, emailed complaint information, and reference to environmental health and safety info. on the City's webpage.
09	10/03/2013	Updated City and Contractor Communication and complaint procedure
08	08/05/2013	Updated references, included an attachments list
07	02/08/2012	Update internal communication procedures
06	07/29/2011	Update public participation program, typographical errors and internal/external communication
05	11/16/2010	Update responsibilities, references, as well as procedures in Appendix 9a
04	05/15/2008	Audit (YR2) 2007
03	06/29/2007	Audit (YR1) 2006
02	11/29/2004	2004 Issue
01	10/01/2004	Approval Draft
SR	01/30/2004	Issued for Status Review

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APPENDIX 9.A — COMPLAINTS & INFORMATION REQUESTS



Procedure for Addressing Biosolids Complaints and Requests for Information

Interested parties may contact personnel at any of the following organizations with biosolids complaints or requests for information:

- 1) Village Creek Water Reclamation Facility (VCWRF- Biosolids Management Program)
City of Fort Worth Public Information Office or City of Fort Worth Environmental Division
- 2) Biosolids Contractor
- 3) Regional Office of the Texas Commission on Environmental Quality (TCEQ).

If City of Fort Worth departments are contacted, the issue is directed to the Biosolids EMS Manager at VCWRF, who then promptly shares this information with the Biosolids Contractor. For complaints received by the Biosolids Contractor, the resulting complaint information shall be forwarded to the City by the end of the business day.

Requests For Information

The City's Biosolids EMS Manager and Biosolids Manager (Contractor) discuss the issue and determine the appropriate action. If general information is requested, the City and/or Biosolids Manager (Contractor) will transmit the requested information, (EMS, land application and biosolids program details, etc.) *within 10 working days* of the date the request was received. Some requests for public information may be subject to provisions within the Freedom of Information Act. Such requests would be processed by the City Secretary's Office according to established procedures.

Biosolids Complaint

If a complaint is filed by an interested party, the City and Biosolids Contractor will complete a complaint form for their respective organizations. (Refer to SOP BSLD 07.001).

The City and Biosolids Contractor shall discuss the complaint. The Biosolids Contractor, in consultation with the City, will evaluate if any corrective actions are feasible and necessary to address the problem in a timely manner. All corrective actions taken will be recorded with the completion date on the complaint form. (Refer to SOP BSLD 07.002)

If needed, the City and/or Biosolids Contractor will follow up with the TCEQ and/or EPA to ensure that no additional actions are required. The Biosolids Contractor shall notify the complainant of any corrective actions that have been or will be implemented.

Complaints are closed and recorded in the City's Biosolids Complaint Log on the VCWRF network and hard copies of the complaint are filed in the Biosolids Complaint Log Binder. (Refer to SOP BSLD 07.001). The Biosolids Contractor records the complaint in the Contractor's Complaint Information database.