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ATTACHMENTS: None

A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform process for collecting (submitting and receiving), evaluating, and, when appropriate, implementing suggestions to improve on the Region's environmental performance.

B. DEFINITIONS

All definitions may be found in the document titled *US Environmental Protection Agency Region 7 Environmental Management System Terms and Definitions* contained in the EMS Manual. For the purposes of this OP, the following terms apply:

- EMS Document
- EMS Record
- Noncompliance
- Nonconformance
- Senior Management
- Significant Environmental Aspect

C. PROCEDURAL STEPS

1. The EMS Coordinator and other members of the EMS Sustainment Team will encourage Region 7 employees, grantees, and on-site contractors to submit suggestions through informal discussion and through any/all of the following formal mechanisms:
 - a. EMS training courses such as the EMS General Awareness Course and the EMS Refresher Training Course;
 - b. Local Area Network (LAN) bulletin board messages;
 - c. Posters and fliers;
 - d. Information placed on the EMS R7@Work Intranet site; and
 - e. Other occasions, such as division / branch staff meetings, during which the EMS is discussed.
2. All suggestions may be submitted to the EMS Coordinator or members of the EMS Sustainment Team.
 - a. It is preferred that suggestions be completed electronically by completing Section I of the EMS Suggestion Form Template (EMS 401-187.8000.00A).

- b. Suggestions submitted by any other means (*i.e.*, hard copy or an email that doesn't include the Template), must be copied onto the Template so that the suggestion can be tracked. This should be done by the individual receiving the suggestion and forwarded to the EMS Coordinator for processing. Completed Templates are EMS documents; therefore, the EMS Coordinator will add a document control code to the Template per EMS 006.7210.02, *EMS Document Control and Records Management*.
 - c. Suggestions may be submitted anonymously and will be processed in accordance with Paragraph b above.
 3. The EMS Coordinator will begin completing Section II of the Template by identifying if any significant aspects are involved and determining if the suggestion addresses a noncompliance and/or nonconformance issue. If it does, the suggestion will be managed instead through the Region's corrective / preventive action process in accordance with EMS 006.7210.12.
 4. Depending on the complexity of the suggestion, the EMS Coordinator may complete the assessment of the suggestion's validity / feasibility or they may ask for assistance from personnel with more technical knowledge and / or experience with the issue involved with the suggestion. The individual who completes the assessment will enter their name and date completed on the Template.
 5. To determine if the suggestion will be implemented or not, the EMS Coordinator may need to consult with members of the EMS Sustainment Team, members of Senior Management, and / or other technical experts.
 - a. If it is determined that the suggestion will be implemented, the EMS Coordinator may do so independently, in coordination with others in the organization, or by establishing an implementation team. The EMS Coordinator will ensure pertinent entries are made in Section III of the Template by the Implementation Lead (if not the EMS Coordinator) concerning the implementation progress. The Implementation Lead will enter their name and date in Section III when the implementation process is completed.
 - b. If the decision is made not to implement the suggestion, the EMS Coordinator, or their designee, will inform the individual(s) who submitted the suggestion as to the reason(s) why the suggestion is not being implemented.
 6. Individuals who submit suggestions will normally be presented a certificate of acknowledgement if their suggestion is not implemented. Individuals whose suggestions are implemented will normally be considered for a non-monetary award or other recognition.

D. RECORDS MANAGEMENT

This OP may result in the generation of EMS records. Any records created will be managed in accordance with the most current version of EMS 006.7210.02, *EMS Document Control & Records Management*.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The quality assurance and quality control (QA/QC) success of the procedure for implementing EMS suggestions, as detailed in this OP, will be determined through the internal and external EMS conformance audit processes. Deficiencies noted during these audits will be managed through the Region's EMS Corrective/Preventive Action Process as defined in the current version of EMS 007.7210.12.

F. REFERENCES

Current versions of the following references are assumed if no date is provided.

1. ISO 14004:2004(E); *Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques*; November 15, 2004
2. *US Environmental Protection Agency Region 7 Environmental Management System Terms and Definitions*
3. US EPA R7, *EMS Document Control and Records Management*, EMS 006.7210.02
4. US EPA R7, *Corrective/Preventive Action Process*, EMS 006.7210.12
5. US EPA R7, *EMS Suggestion / Improvement Form Template*, EMS 401-187.8000.00