



NONCONFORMITY, CORRECTIVE & PREVENTIVE ACTION

STANDARD ENVIRONMENTAL OPERATING PROCEDURE

WASTE
REDUCTION
& DISPOSAL
DIVISION

ISO 14001 - 4.5.3

1.0 PURPOSE AND SCOPE

This procedure describes a controlled process for initiating and completing corrective or preventive action in response to reported non-conformances that relate to the operation of the ISO 14001-compliant Environmental Management System (EMS) within the City of San Diego, Environmental Services Department, Waste Reduction and Disposal Division (WRAD). This SEOP also describes the process for presenting ideas for continuous improvement of the Division's EMS.

2.0 DEFINITIONS

2.1 Non-conformance - For the purposes of this procedure, a **non-conformance** is defined as a demonstrated lack of compliance with the environmental policy and other mandatory provisions of the WRAD's EMS, as documented by WRAD's Environmental Management System Manual (EMS-M) and the supporting plans and procedures referenced therein.

2.2 Corrective and Preventive Action Requests - Corrective and Preventive Action Request (C/PAR) forms may be initiated by any WRAD employee who believes a non-conformance situation exists within the division. The forms can be sent directly to the Environmental Management Representative (EMR) or forwarded to the EMR via a Supervisor or Section Manager. These forms are also used to recommend ways in which the WRAD can improve upon its EMS.

2.3 Corrective Action Requests - Corrective Action Request (CAR) forms are initiated by internal or third party Auditors who identify a non-conformance situation within WRAD during the course of an EMS audit. The forms are sent directly to the EMR for corrective action.

3.0 RESPONSIBILITY AND AUTHORITY

Deputy Director - is responsible for reviewing open C/PARs and CARs, monitoring their progress and ensuring that the Section Managers respond to and resolve their non-conformances in a timely manner.

3.1 Environmental Management Representative (EMR) - is responsible for receiving, documenting and responding to C/PARs and CARs, forwarding them to the appropriate section and tracking them throughout their lifecycle.

3.2 Section Managers - Section Managers and/or Supervisors of the sections determined to have primary responsibility for a non-conformance shall participate with the EMR in the evaluation of the non-conformance, determination of the root cause, determination of appropriate measures to be taken to correct the immediate situation, and the determination of appropriate preventive measures that could reasonably be taken to reduce or preclude the likelihood for recurrence of the non-conformance. It is the responsibility of the Section

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Manager to ensure these corrective and preventive actions are completed within the determined timeframe or report a revision to the EMR, immediately following the acknowledgement for a need to revise a completion date. Section Managers are also responsible for forwarding C/PARs, initiated by their staff, to the EMR for documentation, response, and retention.

3.3 WRAD Employees – all personnel are responsible for bringing suspected non-conformances to the attention of their Supervisors and/or the EMR. All personnel are also encouraged to recommend ways in which the Division might improve upon its EMS in an effort to further reduce impacts on the environment as a result of activities, processes or products.

4.0 PROCEDURE

4.1 Upon receipt of environmental communications (C/PAR, CAR, e-mail, etc.) that indicate a potential non-conforming condition, or upon review of internal or external EMS audit reports, or management review reports that indicate a potential non-conforming condition, the EMR shall make a preliminary determination of whether or not a non-conformance exists.

4.2 When no non-conformance is determined to exist, the EMR shall make an appropriate verbal or written response to the originator through the processes defined in WRAD-SEOP 4.4.3, Communication, and maintain documentation of such action as an environmental record in compliance with WRAD-SEOP 4.5.4, Control of Records.

If a non-conformance is determined to exist:

4.3 The EMR shall document the non-conformance on a C/PAR form, assign the C/PAR a control number and enter basic C/PAR information on the C/PAR-CAR Tracking Sheet. In the event a CAR is generated as a result of an audit, the Lead Auditor shall document the non-conformance on a CAR form and forward the CAR to the EMR. The EMR will enter basic CAR information on the C/PAR-CAR Tracking Sheet.

The EMR shall forward a copy of the open C/PAR or CAR to the Deputy Director and the Section Manager with primary responsibility for the non-conforming condition. The Section Manager will develop appropriate corrective and preventive actions that can be taken to correct the near-term condition, as well as preventive measures that could reasonably be expected to reduce or preclude the likelihood of the recurrence of the non-conformance. Root cause determination and proposed corrective and preventive actions shall be briefly summarized on the C/PAR or CAR Action Plan. Due dates for completion of the proposed corrective and preventive actions shall be established, and the C/PAR or CAR Action Plan updated as appropriate to document the responsible Section Manager's recommendations. Due dates may be extended as determined necessary by the Section Manager or Supervisor with EMR approval. These extended dates will be noted on the C/PAR or CAR Action Plan in addition to an explanation for the extension.

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4.4 The responsible Section Manager will also identify the means for reviewing the effectiveness of the corrective and/or preventive action and indicate such on the corrective action plan.

4.5 The EMR shall track the progress of corrective and preventive action until completion using the C/PAR-CAR Tracking Sheet, and verify completion of all required actions. Once corrective action has been completed, the EMR shall indicate C/PAR closure by signature while the Lead Auditor shall indicate CAR closure by signature, and the completed C/PAR or CAR, with any attachments, shall be retained as an environmental record in compliance with WRAD-SEOP 4.5.4 and the WRAD EMS-Manual. The Deputy Director will be notified upon closure of all C/PARs and CARs. Notification may be by e-mail, phone or copy of closed C/PAR or CAR form.

Note: This procedure is not to be confused with the site specific corrective action that is driven by process control, safety inspections, and other agency facility inspections. The site staff will initiate corrective action and maintain records for these site specific corrective actions.

5.0 REFERENCES

EMS - Manual Section: 4.4.3 Communication

EMS - Manual Section: 4.5.3 Nonconformity, Corrective and Preventive Action

WRAD-SEOP 4.4.3 "Communication"

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The on-line version located on the WRAD EMS Website is the control document. Controlled hardcopies will be identified by a "Controlled Copy" stamp (in red). All other hard copies are uncontrolled. For all hardcopy versions verify revision level status on-line or contact the EMR.