

Element 14 – Non-conformances: Preventative and Corrective Action

Version Number: 9
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Purpose

The following describes the District's procedures for preventing, investigating, and correcting non-conformances with EMS procedures and/or regulatory requirements related to the District's biosolids program.

Responsible Parties

EMS Coordinator
Division Heads
Director of Monitoring & Research
Field EMS Representative

Procedure

1. Upon identification of a minor non-conformance as a result of a verification, internal, interim audit, the EMS Coordinator will detail the non-conformance in a memo to the respective Division Head. The EMS Coordinator will work with the appropriate personnel to perform the corrective action and prepare a work plan to track completion of the necessary corrective actions as described in Document 14.1.
2. Upon identification of a major non-conformance as a result of a verification, internal, or interim audit, the EMS Coordinator will detail the non-conformance in a memo from the Director of M&O to the respective Division Head and/or Director of Monitoring & Research notifying them of the nature of the non-conformance, and directing them to initiate an investigation into the cause of the non-conformance and submit the results of the investigation to the Director of M&O. The memo will also require that a corrective action plan be submitted for resolving and preventing the reoccurrence of the non-conformance as described in Document 14.1.

If the major non-conformance is to be handled by the EMS Coordinator, he/she will detail the non-conformance in a memo from the Division Head to the Director of M&O detailing the nature of the non-conformance and submit the results of the investigation of the cause. The memo will also include a corrective action plan for resolving and preventing the reoccurrence of the non-conformance as described in Document 14.1.

3. The EMS coordinator will review and approve the correction action plans. After the EMS coordinator has approved them, he/she will send a memo to the field notifying them to commence the plan.
4. The EMS Coordinator will track the progress of any corrective action and maintain documentation of tracking with a spreadsheet. The EMS Coordinator will send a memo or email to the Division Head or Director of Monitoring & Research asking for a corrective action progress reports. For minor non-conformances, updates will be sent every two weeks; for major non-conformances, updates will be sent every four weeks.

5. Upon completion of the corrective action for any non-conformance, the division head responsible for implementing the corrective action will notify the Director of M&O. This procedure will be transmitted to the field in the memo that is sent in item 3. The EMS Coordinator or, if the EMS Coordinator is responsible for implementing the corrective action, a designee will provide an independent verification that the corrective action has been implemented.
6. Upon the identification of a major or minor non-conformance during routine monitoring and measurements, the employee who identifies the non-conformance will notify the EMS Coordinator via email or memo. The EMS Coordinator will follow the above procedures. The EMS Coordinator will discuss Element 14 during the EMS Awareness Training to remind employees to follow this procedure.
7. Definitions of major and minor nonconformance's can be found in Document 00.4 – Definitions.
8. Records of preventive and corrective action for potential and/or actual non-conformances will be maintained by the Field EMS Representative and the EMS Coordinator.
9. Upon the occurrence of an NPDES violation, the District will follow the *Protocol for Verification, Investigation and Reporting of NPDES Permit Violations for Water Reclamation Plant*, June 2001, located in the Analytical Laboratory Division of the R&D Department.
10. Identifications of a biosolids non-compliance with regulatory requirements for other than reporting requirements will follow the procedures of major non-conformances (items 2 through 5 above).
11. A summary of identified major and minor non-conformances and respective corrective action(s) related to the District's biosolids management program will be published in the *Biosolids Program and EMS performance Report*, described in Element 15.

References

Document 0.4 - Definitions

Document 14.1 – Corrective Action Plan Guidance

Element 15 – Biosolids Program and EMS Performance Report

Element 16 – Biosolids EMS Internal Audit Guidance

Protocol for Verification, Investigation and Reporting of NPDES Permit Violations for Water Reclamation Plant

Revision History

Version Number	Version Date	Description of Revision
0	7/28/05	Original Issue
1	10/14/05	Revised procedures to clarify between major and minor non-conformances Added procedure to define major and minor non-conformances. Added procedure to address corrective action plans to address nonconformance's identified during routine monitoring and measurements. Added procedure to detail the investigation of noncompliance with regulatory requirements other than reporting requirements
2	12/12/06	Revised procedure 2 to capture the responsibilities of the EMS Coordinator in handling the non-conformance and the corrective action plan. Revised procedure 10 to include procedures for non-compliance with biosolids regulatory requirements. Revised procedure 5 to address who will provide an independent verification that the corrective action has been implemented.
3	3/6/07	Revised Procedure 5 to distinguish procedures for notification of completing a corrective action for major and minor non-conformances.
4	01/23/09	Revised Procedure 5 to state that notification of completion of all non-conformances is to be sent to the Director of M&O.
5	4/22/09	Updated Position Titles for Division Heads
6	10/8/09	Updated footer
7	7/8/11	Procedure 4. Added "maintain documentation of tracking with a spreadsheet". Procedure 11. Changed title of report
8	10/17/11	Edited Footer with Official Document Location
9	3/16/15	Revised References to read Biosolids Program and EMS Performance Report.