



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 03/01/10

Procedure EIP-13

Revision: 3.1

Nonconformity, Preventive, and Corrective Action

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PURPOSE:

The purpose of this Environmental Implementation Procedure (EIP) is to establish processes for initiating corrective and preventive actions to correct instances of nonconformance, reduce the potential for recurrence, mitigate adverse impacts, and initiate environmental improvements.

DEFINITIONS:

Nonconformity - any deficiency in parts of the EMS framework and/or a deviation from legal and regulatory requirements.

Corrective actions - systematic procedures to address deficiencies and reduce the potential for the recurrence of previous instances of nonconformance.

Preventive actions - systematic procedures to address and reduce the potential for an instance of nonconformance before it happens.

RESPONSIBILITY:

Office of Stewardship and Compliance (OSC):

- Provide oversight and assist Bureaus investigate nonconformities and implementing preventive and corrective actions to address them.
- Track nonconformities, share lessons learned, and communicate resulting preventive and corrective actions between Bureaus.

Director/Bureau Administrator:

- Advocate that the Bureau responds appropriately to identified nonconformities.
- Advocate that Bureau employees understand the consequences of nonconformity.
- Coordinate with OSC, Bureau management, and the EMS Team to evaluate and document nonconformity, investigate their causes, and mitigate their impacts.
- Provide management support and adequate resources to implement preventive and corrective actions.

Bureau EMS Coordinator:

- Lead Bureau efforts to identify and implement preventive and corrective actions for identified nonconformities.

Bureau Employees:



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- Understand the consequences of nonconformity.
- Report nonconformities to Bureau management and the EMS Team.
- Be aware of and follow preventive and corrective action plans, policies, and procedures.

DOCUMENTS AND RECORDS:

- EIP-13-Form 13a Nonconformity, Preventive, and Corrective Action Log

PROCEDURE:

1. OSC and the Bureau EMS Team identify instances of potential or real nonconformity during all stages of EMS implementation. Information about nonconformity can be obtained from:
 - Reviewing objectives, targets, and environmental action plans.
 - EMS and regulatory data collected during monitoring and measurement.
 - Operational controls, particularly if those controls fail.
 - Internal and external audit findings.
 - Emergency plans, emergency events, and noncompliance incidents.
2. When a nonconformity or deficiency is identified, OSC and the Bureau EMS Coordinator take immediate and appropriate action to minimize its impact and to protect human health and the environment. Make necessary notifications to regulatory agencies, as required.
3. Once the situation is stabilized, the Bureau EMS Coordinator should gather a group of individuals to investigate the root cause(s) of the occurrence.
4. OSC and the Bureau EMS Team use root cause analysis to identify those immediate and longer-term actions necessary to correct the problem. Refer to the Contributing Cause Categories in EIP-13-Form 13a to help identify root causes of the nonconformity. Identify the actions needed to reduce the potential for the problem occurring again in the future.
5. The Bureau EMS Team assigns responsibility and authority to implement the corrective and preventive actions. The Team defines a schedule to implement the corrective and preventive actions. The Bureau EMS Coordinator tracks progress toward completion of the actions.



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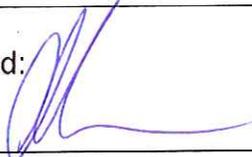
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- 6. OSC and the Bureau EMS Team review and revise applicable operating procedures, work instructions, policies, and the EMS to reflect the implemented corrective and preventive actions. Document all changes, and communicate them to affected employees, onsite service providers and contractors.
- 7. The Bureau EMS Coordinator records all actions taken in the steps above in the Nonconformity, Preventive, and Corrective Action Log (EIP-13-Form 13a).
- 8. OSC and the Bureau EMS Coordinator periodically check to confirm the corrective and preventive actions put in place continue to be effective. This can be accomplished by conducting drills or exercises, internal self-assessments, and by reviewing pertinent documents and records.
- 9. OSC and the Bureau EMS Coordinator share the lessons learned and the corrective and preventive actions taken to reduce the potential for recurrence with other Bureaus. Include discussion of nonconformities and corrective and preventive actions in the annual management review meeting with Bureau and NHDOT management (see EIP-16: Management Review).
- 10. The Bureau EMS Coordinator maintains all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.

<p>Approved: </p> <hr/> <p>Name <u>State Maint Engineer</u></p> <hr/> <p>Title _____</p> <hr/> <p>Date <u>2/15/11</u></p>	<p>Revision #: <u>3.1</u></p> <p>Revision Date: <u>2/10/11</u></p> <p>Supersedes Revision #: <u>3.0</u></p>
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