



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 5/10/2017

Procedure EIP-13

Revision: 3.2

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.

RESPONSIBILITY:

Commissioner/Division Director:

- Ensure the Department addresses administrative orders and other actions against the Department from external agencies appropriately, and resolves these items in a timely manner.
- Ensure that the Department Staff & Bureaus respond appropriately to internal nonconformities.

Office of Stewardship and Compliance (OSC):

- Identify and classify nonconformities to bureau staff during EMS and Compliance Evaluations
- Provides recommendations for corrective actions, and schedules for completion in writing following Compliance Evaluations.
- Report nonconformities to Bureau Management, and appropriate Bureau staff including but not limited to Administrators, EMS/S&E Coordinator, District Engineer.
- Track nonconformities identified in compliance evaluations, adjust programs and training as appropriate to reflect changes in practices, and communicate resulting preventive and corrective actions within the Departments Bureaus.

Bureau Administrator:

- Ensure that the Bureau and Districts respond appropriately to nonconformities and other actions as necessary.
- Advocate that Bureau employees understand the consequences of nonconformity.
- Provide support and adequate resources to implement preventive and corrective actions for nonconformities identified during Peer Reviews and Compliance Evaluations at the bureau level.
- Make requests and recommendations to Front office staff regarding resources required to implement preventative and corrective actions related to Administrative Orders or other actions against the department from external agencies.

District Engineer:

- Oversees the district response to nonconformities when identified.



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- Ensure that District employees understand the consequences of nonconformity.
- Provide support and adequate resources to implement preventive and corrective actions at the district level.

District Environmental & Safety Coordinator

- Share lessons learned, and communicate resulting preventive and corrective actions between Patrol Sheds, and Districts.
- Coordinates facility response to nonconformities when identified.

Bureau EMS Coordinator:

- Coordinate with OSC, Bureau management, and the EMS Team to evaluate and document nonconformity, investigate their causes, and mitigate their impacts.

Bureau Employees:

- Understand the consequences of nonconformity.
- Report potential 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
- EIP-13-Form 13b Corrective Action & Root Cause Analysis Form

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 findings.
 - Emergency plans, emergency events, and noncompliance incidents.
2. When a nonconformity or deficiency is identified, OSC and the Bureau EMS Coordinator and or the Safety and Environmental Coordinator shall take appropriate action to minimize any impact and to protect human health and the environment that the nonconformity may cause. Notifications to regulatory agencies will be made as required.



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3. Once the situation is stabilized, the Bureau EMS Coordinator will organize a group of individuals, including but not limited to appropriate members of the EMS Team, to investigate all incidents of non-conformity classified as major or urgent.
4. During the review, EMS Team members from the appropriate district evaluate the nature of the non-conformity and provide a recommendation through the District Engineer to the Bureau Administrator, whether a root cause analysis with a corresponding corrective action plan should be performed.
5. The Bureau Administrator reviews the recommendation with the EMS Coordinator and determines the concurrence with the district EMS Team recommendation.
6. If a Corrective Action or Root Cause Analysis is required, EIP-13-Form 13b shall be completed by appropriate members of the EMS Team.
7. District Engineer/Bureau Administrator assigns responsibility and authority to implement the necessary corrective and preventive actions and define a schedule to implement the corrective and preventive actions. The Bureau EMS Coordinator makes recommendations as necessary and tracks progress toward completion of the actions. Corrective Action Plans, if any, shall be documented on the Corrective Action Plan EIP-13-Form 13b.
8. During EMS Quarterly Meetings The Bureau EMS Team reviews and revises 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.
9. The Bureau EMS Coordinator records all actions taken in the steps above in the Nonconformity, Preventive, and Corrective Action Log (EIP-13-Form 13a).
10. 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.
11. The EMS Coordinator shares the lessons learned and the corrective and preventive actions taken to reduce the potential for recurrence within the Bureau. Include discussion of nonconformities and corrective and preventive actions in the annual



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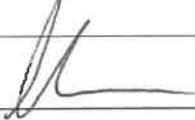
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management review meeting with Bureau and NHDOT management (see EIP-16: Management Review).

12. 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.

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