



Verification	Originator	Approved	Issued
Initials	SS	ST	ST
Date	09/26/2014	12/15/2014	12/15/2014

### Title: COFL-GTL-EP- 4.5.3-1 Nonconformity, Corrective Action and Preventive Action Procedure

<b>Person responsible:</b>	<b>Regional Wastewater Facility Manager</b>		
<b>Area of application:</b>	George T Lohmeyer Wastewater Treatment Plant (GTL)		
<b>Document location:</b>	<a href="http://www.fortlauderdale.gov/ESMS">www.fortlauderdale.gov/ESMS</a>		
<b>Revisions</b>			
<b>Rev. No.</b>	<b>Date</b>	<b>Description</b>	
001	8/7/15	Minor text update.	
002	1/7/16	Added time frames for verification of CAR and PAP.	
003	7/29/16	Minor text updates.	
<b>Recurring action items</b>			
<b>Activity</b>	<b>Responsibility</b>	<b>Frequency</b>	
1. Identify Corrective Action Requests (CARs) and Preventive Action Request (PAPs) based upon findings of audit it conducts, or audits of second or third party.	GTL Team	As necessary	
2. Implement corrective action schedules, and ensure nonconformance is resolved (closed)	GTL Team / Regional Chief Wastewater Operator	As necessary	
3. Correct nonconformance identified in his/her department or area	Regional Chief Wastewater Operator	As necessary	

#### Procedure Index

1.0 Purpose

2.0 Scope



### 3.0 Responsibility

### 4.0 Definitions

### 5.0 Process

### 6.0 References / Related Documents

#### 1.0 Purpose

- 1.1 The purpose of this procedure is to establish practices related to the identification, implementation and tracking of corrective and preventive actions for GTL.
- 1.2 This procedure describes the process to **investigate** nonconformities, to determine their causes, to **mitigate** the environmental impact that nonconformities, to avoid their reoccurrence and to record the results achieved.

#### 2.0 Scope

- 2.1 This procedure is responsive to element 4.5.3, Nonconformity, Corrective Action and Preventive Action, of the ISO 14001:2004 standard and covers operations of GTL.
- 2.2 The corrective action process includes two types of **preventive action** – one to prevent re-occurrence and one to prevent potential nonconformities.

#### 3.0 Responsibility

- 3.1 The **Regional Wastewater Facility Manager** will coordinate the *Corrective and Preventive Action Program* by:
  - 3.1.1 Maintaining documentation of Corrective Action Requests (CARs), Preventive Action Proposals (PAPs) and other related documents obtained during Internal ESMS Audits, Environmental Compliance Evaluations, Inspections or any other environmental issue;
  - 3.1.2 Reviewing and signing all CARs and PAPs;
  - 3.1.3 Distributing any changes to procedures or documents resulting from the CARs or PAPs.
- 3.2 The **ESMS Internal Self-Audit Team** members will initiate the Corrective Action Requests (CARs) and Preventive Action Proposals (PAPs) based upon audit findings. ESMS Audit Teams are also responsible for:
  - 3.2.1 Recording any nonconformance findings during an audit on the proper forms described in this procedure;
  - 3.2.2 Verifying the effectiveness and completion of the CARs or PAPs with the ESMS Management Representative.
- 3.3 The **Regional Chief Wastewater Operator** is responsible for:
  - 3.3.1 Promptly correcting findings and nonconformance's identified.
  - 3.3.2 Documenting corrective action and preventive action results on the proper forms and communicating progress to the Regional Wastewater Facility Manager.



3.3.3 Assisting the Regional Wastewater Facility Manager with the evaluation of training needs when corrective or preventive action requires a process change.

3.4 **Water and Wastewater Treatment Manager** is responsible for:

3.4.1 Keeping informed of the *Internal ESMS Audit* findings and nonconformances and following up on the corrective actions.

#### 4.0 Definitions

##### 4.1 COFL-GTL-EP-4.4.4-2 Related Definitions Procedure

4.1.1 **Internal ESMS Audit** – refer to ESMS document **COFL-GTL-EP 4.5.5-1 Internal ESMS Auditing** procedure;

4.1.2 **Environmental Compliance Evaluation** – refer to ESMS document **COFL-GTL-EP 4.5.2-1 Evaluation of Compliance** procedure.

#### 5.0 Process

- 5.1 The ESMS Audit Team will record any nonconformance findings identified during an *Internal ESMS Audit* on **COFL-GTL-EP 4.5.3-1FA Corrective Action Request (CAR)** form. The element within the ISO 14001:2004 Standard associated with the nonconformance finding should also be recorded if applicable. For example, 4.6 Management Review.
- 5.2 The ESMS Audit Team will keep a listing of Corrective Action Requests (CARs) issued during the audit and the **Regional Wastewater Facility Manager** records them on **COFL-GTL-EP 4.5.3-1FB Corrective Action Request Log** form.
- 5.3 The ESMS Audit Team member discovering the findings will describe the nature of the nonconformance. Based on the audit report, the **Regional Wastewater Facility Manager** initiates a CAR form with the findings, and forwards it to the **Regional Chief Wastewater Operator** .. The **Regional Wastewater Facility Manager** will keep a copy of the CAR form and forward it to the Water and Wastewater Treatment Manager with other relevant documentation at the end of the ESMS audit.
- 5.4 The **Regional Chief Wastewater Operator** will complete the CAR form by identifying the root cause, developing short and long term corrective actions, and preventive actions, as appropriate.
- 5.4.1 The **Regional Chief Wastewater Operator** that receives the CARs is responsible for returning them to the GTL Team.
- 5.5 Steps taken in the corrective action are documented on the CAR. Additional information can be attained to provide supporting documentation.
- 5.6 Upon receiving a response to the CAR the GTL Team will contact the relevant ESMS Audit Team members to verify the completion and effectiveness of the long term action. After an appropriate trial period (not to exceed 80 business days), verification will be documented on the original CAR then returned and maintained by the ESMS Coordinator.
- 5.7 The **COFL-GTL-EP 4.5.3-1FC Preventive Action Proposal (PAP)** form will be used to document observations, employee concerns or suggestions for an area to prevent a nonconformance from occurring. The PAP form will be issued to and completed by the **Regional Chief Wastewater Operator** of the area where the preventive action is needed. The **Regional Chief Wastewater Operator** will forward the PAP response to the



### **Regional Wastewater Facility Manager.**

- 5.8 The Preventive Action Proposal (PAP) will be reviewed by the GTL Team to determine if the proposed preventive action and target dates are appropriate and to avoid their reoccurrence. After an appropriate trial period (not to exceed 90 business days), verification will be documented and a copy of the form will be returned to the **Regional Chief Wastewater Operator**. The original form will be maintained by the **ESMS Coordinator**.
- 5.9 The **GTL Team** will ensure that nonconformance has been resolved (closed) and verification will be documented on the original CAR and PAP forms. The **ESMS Coordinator** will maintain documentation.
- 5.10 In addition to Internal Self-Audits, the following will also be incorporated into GTL's Corrective and Preventive Action Program, as appropriate: Compliance Evaluations, second- and third-party (outside) audits, inspections by regulatory agencies and other authorities, certain internal observations, and any situations which impact the environment.
- 5.11 Nonconformance findings and CARs from *Internal ESMS Audits, Compliance Evaluations*, inspections, accidents, and other observations will receive timely corrective action. CARs requiring **more than 90 business days** to complete will have Water and Wastewater Treatment Manager approval.
- 5.12 The ESMS Coordinator is responsible for recording and distributing any changes to documented procedures resulting from corrective and preventive action. This will be done in accordance with **COFL-GTL-EP 4.4.22-1 Competence, Training and Awareness** procedure if additional training is needed.
- 5.13 CARs and PAPs generated as a result of regulatory and compliance nonconformance are distributed to responsible management as appropriate. Appropriate distribution is the responsibility of the ESMS Coordinator.
- 5.14 During Management Reviews, the **Water and Wastewater Treatment Manager** will brief **City Manager and Management Representative** on progress toward resolution (closure) of corrective and preventive action. Emergencies will be communicated via the chain of command. Refer to **COFL-GTL-EP 4.5.5-1 Internal Audit Procedure** and **COFL-GTL-EP 4.6-1 Management Review Procedure**.

### **6.0 References / Related Documents**

- 6.1 COFL-GTL-EP 4.5.5-1 Internal ESMS Auditing procedure
- 6.2 COFL-GTL-EP 4.5.3-1FA Corrective Action Request (CAR) form
- 6.3 COFL-GTL-EP 4.5.3-1FB Corrective Action Request Log form
- 6.4 COFL-GTL-EP 4.5.3-1FC Preventive Action Proposal (PAP) form
- 6.5 COFL-GTL-EP 4.4.22-1 Competence, Training and Awareness procedure
- 6.6 COFL-GTL-EP 4.6.12-1 Management Review procedure
- 6.7 COFL-GTL-EP 4.5.2-1 Evaluation of Compliance procedure
- 6.8 COFL-GTL-ED-4.5.4-3 Nonconformity, Corrective Action and Preventive Action Annual



Review Maintenance