

**U.S. Environmental Protection Agency
ENVIRONMENTAL SCIENCE CENTER, FORT MEADE, MARYLAND**

**ESC EP09.03
Environmental Management System Procedure for:**

**Handling Non-conformances and
Preventive and Corrective Actions**

Effective Date: August 31, 2005

Issued by:

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Review Date: 7/11/07	EP09.03
By: Rebecca Pines	
Changes: edited the suggestion memo for clarity	

1. Purpose

To define the responsibility and authority for handling and investigating Environmental Management System (EMS) non-conformances, for taking action to mitigate any impacts caused, for initiating and completing corrective and preventive action, and for reporting trends in nonconformance to management during management review.

2. Scope

Non-conformance is any deviation from established procedures, programs and other arrangements related to the EMS. They may include non-compliances to regulations, but not all non-compliances are necessarily non-conformances.

3. Procedure

a) Specific Procedure

- Whenever a non-conformance in the EMS is detected, the EMS Coordinator shall be notified about the nonconformance through the use of one of two corrective action forms (Attachments 1 and 2).
- Procedural gaps, non-conformances, or suggestions resulting from management review are tracked using the ESC EMS Corrective Action Forms (Attachment 1).
- Observed non-conformances and suggestions that result from an internal or external audit are tracked using the EMS Audit Corrective Action Form (Attachment 2).
- A third form called the Suggestion and Idea Form (Attachment 3) is available to any individual who would like to submit ideas, suggestions or document any problems they see. The submitter does not need to make any determinations as to non-conformance, etc. Once the form has been submitted, the EMS Team will discuss it at a followup meeting and make that decision if necessary. The form will be tracked and the outcome of the Team's discussions and actions will be documented on the form.
- EMS system-level corrective actions are the responsibility of the EMS Coordinator and are tracked using the ESC EMS Corrective Action Forms.
- When the Facility Manager or Safety, Health, and Environmental Management (SHEM) Manager detect the need for corrective action within the scope of their official duties and responsibilities, they initiate and document the corrective action using work assignments, written procedures, work group meeting notes, and/or training.
- Corrective actions that require resource allocations will be made through the existing Environmental Science Center (ESC) Board.

- Any corrective action taken to eliminate the causes of actual and potential nonconformance shall be appropriate to the magnitude of problems and commensurate with the environmental impact encountered.
- The EMS Coordinator will confer with the affected line manager to take all necessary steps to ensure that the nonconformance does not recur.

b) Responsibilities

- The EMS Coordinator shall confer with the affected line manager on actions to take to mitigate any impacts caused and for initiating and completing corrective action.
- The affected line manager is responsible to ensure that the correction is completed as agreed
- The EMS Coordinator shall record any changes to the documented procedures from corrective action.
- The EMS Coordinator shall record any changes to the documented procedures from preventive action.
- The affected line manager is responsible to ensure that the preventive action is completed as agreed.

4 Documentation

All actions related to EMS non-conformances shall be documented and retained in accordance with EPA's records retention policy and procedures.

Attachment 1

Environmental Science Center EMS Corrective Action Form

Corrective Action Control Number: ESC CAxxx	
Completed by:	Date recorded:
Observed Nonconformance:	
Cause of Nonconformance:	
Corrective Action Needed:	
Projected Date(s) for completion:	
Responsible Individuals:	
Corrective Actions Completed:	
Date(s) Completed:	
Completion Determined by:	Date:

Attachment 2

Environmental Science Center EMS Audit Corrective Action Form

Audit Type: _____

Document Control Number: ESC ACxx

Audit Date: _____

Form Completed by:

Auditors and Affiliation: _____

Status : _____

Audit Findings				
Observed nonconformance	Cause of nonconformance	Corrective Action Needed and Date Completed	Responsible Person/Group	Objective Evidence

Attachment 3

Environmental Science Center EMS Suggestion and Idea Form

Suggestion and Idea Control Number: ESC SI-	
Completed by:	Date recorded:
Suggestion / Idea <i>(include cost information where appropriate):</i>	
<i>The rest of the form can be filled out by the EMS Team</i>	
Action plan be developed by the EMS Team? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, complete below.</i>	
Projected Date(s) for Completion:	
Responsible Individuals:	
Actions Completed:	
Date(s) Completed:	