

**Region 4**  
**U.S. Environmental Protection Agency**  
**Science and Ecosystem Support Division**  
**Athens, Georgia**

**OPERATING PROCEDURE**

**Title: Corrective Action**

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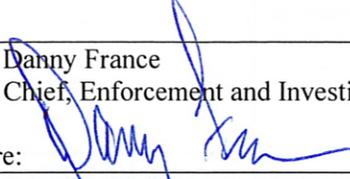
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## Revision History

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The top row of this table shows the most recent changes to this controlled document. For previous revision history information, archived versions of this document are maintained by the SESD Document Control Coordinator on the SESD local area network (LAN).

History	Effective Date
<p><b>SESDPROC-009-R4, Corrective Action, Replaces SESDPROC-009-R3</b></p> <p><b>General:</b> Corrected any typographical, grammatical, and/or editorial errors.</p> <p><b>Cover Page:</b> Changed the Author from Laura Ackerman to Bobby Lewis. Changed the Enforcement and Investigations Branch Chief from Archie Lee to Danny France. Changed the Ecological Assessment Branch Chief from Bill Cosgrove to John Deatruck. Changed the FQM from Laura Ackerman to Bobby Lewis.</p> <p><b>Revision History:</b> Changes were made to reflect the current practice of only including the most recent changes in the revision history.</p> <p><b>Section 1.2:</b> Added the following statement - Mention of trade names or commercial products in this operating procedure does not constitute endorsement or recommendation for use.</p>	<p><b>February 28, 2013</b></p>
<p><b>SESDPROC-009-R3, Corrective Action, Replaces SESDPROC-009-R2</b></p>	<p><b>August 10, 2009</b></p>
<p><b>SESDPROC-009-R2, Corrective Action, Replaces SESDPROC-009-R1</b></p>	<p><b>November 1, 2007</b></p>
<p><b>SESDPROC-009-R1, Corrective Action, Replaces SESDPROC-009-R0</b></p>	<p><b>October 1, 2007</b></p>
<p><b>SESDPROC-009-R0, Corrective Action Associated with External Complaints and Quality System Assessments, Original Issue</b></p>	<p><b>February 5, 2007</b></p>

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# **1 General Information**

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## **1.1 Purpose**

This document defines the procedure used to handle corrective action within the SESD field branches.

## **1.2 Scope/Application**

This procedure applies to managers, the branch Quality Assurance Officers (QAOs) within the field branches and the Field Quality Manager (FQM) who are the focal points for handling corrective action within the field branches. Mention of trade names or commercial products in this operating procedure does not constitute endorsement or recommendation for use.

## **1.3 Documentation/Verification**

This procedure was prepared by persons deemed technically competent by SESD management, based on their knowledge, skills and abilities. The official copy of this procedure resides on the SESD local area network (LAN). The Document Control Coordinator (DCC) is responsible for ensuring the most recent version of the procedure is placed on the LAN and for maintaining records of review conducted prior to its issuance.

## **1.4 Definitions**

### ***1.4.1 Corrective Action***

An action initiated in response to an identified nonconformance, in order to define a problem, attempt to identify the root cause and determine how to prevent the problem from recurring.

### ***1.4.2 Corrective Action Team***

A corrective action team is designated by management and the FQM to investigate the root cause of a nonconformance and to propose a solution to the problem. The corrective action team may consist of one or more people and management may be part of the team if appropriate.

### ***1.4.3 Nonconformance***

Departure from the policies and procedures in the SESD Field Branches Quality System or technical operations, or the absence of a specified requirement.

## 1.5 References

SESD Corrective Action Form (SESDFORM-006, most recent version)

SESD Corrective Action Tracking Log (SESDFORM-028, most recent version)

SESD Operating Procedure for Document Control (SESDPROC-001, most recent version)

## **2 Methodology**

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### **2.1 General**

This procedure discusses how corrective action will be handled to address nonconforming work within the SESD field branches.

### **2.2 Corrective Action Initiation and Tracking**

Once the need for a corrective action has been identified, anyone within the field branches can initiate a corrective action request through the Field Quality Manager (FQM).

Corrective actions will be uniquely identified to facilitate tracking. A seven digit identification number will be assigned to each corrective action by the FQM. Tracking numbers will begin with CA. The first four digits will represent the fiscal year. The last three digits will begin at 001 and increase sequentially with each additional corrective action. The last three digits will start over at 001 at the beginning of each fiscal year (Ex. CA2007-001). The FQM will track corrective actions using the Corrective Action Tracking Log (SESDFORM-028).

Corrective actions will be documented using the SESD Corrective Action Form (SESDFORM-006).

### **2.3 Corrective Action Process**

The following procedure will be followed for addressing corrective actions.

1. Upon identification or notification of the need for a corrective action, the FQM will assign a corrective action identification number and begin documentation of the corrective action on the SESD Corrective Action Form (SESDFORM-006).
2. The FQM in consultation with the affected management will designate a Corrective Action Team (CAT) to assess the issues surrounding the problem. Members of the CAT will be noted on the SESD Corrective Action Form (SESDFORM-006).
3. The CAT will investigate the issue and determine the root cause of the problem. A summary of the assessment will be included on the SESD Corrective Action Form (SESDFORM-006).
4. Once the root cause of the problem has been identified, the CAT will determine how to correct the problem and prevent it from recurring. A summary of the cause and solution will be included on the SESD Corrective Action Form (SESDFORM-006).
5. The CAT will present the proposed solution to the affected management and the FQM for approval.

6. Upon approval of the solution, if any policies or procedures require updates, the FQM will ensure they are conducted in accordance with the SESD Operating Procedure for Document Control (SESDPROC-001).
7. The FQM will notify all affected personnel either verbally or in writing (email or memo) of any changes that result from the corrective action process.
8. Management is responsible for ensuring all affected personnel are implementing any changes. Some ways that management may do this is through direct communication with their staff and reviews of project records.
9. The FQM, or their designee will formally monitor the effectiveness of corrective actions by conducting a review of the corrective action. The time frame for reviews will be determined by the FQM and will be based on the magnitude and risk of the problem. Multiple follow-ups may be conducted to ensure the effectiveness of the corrective action.
10. If the FQM determines that the corrective action is not effective, based on the magnitude and risk of the problem, the CAT or management may be tasked with re-evaluating the problem and proposing another solution. If so, steps 5-9 above may be repeated. There may be situations where management needs to reassign members of the CAT due to expertise with a specific issue or to bring new perspective to a problem. In those situations, Steps 2-9 may be repeated.
11. Once the problem has been adequately addressed, the FQM will close-out the corrective action as shown in Section 4 of the SESD Corrective Action Form (SESDFORM-006).

Based on identified areas of nonconformance, SESD will conduct internal audits of appropriate areas of activity, as needed, to ensure compliance with SESD policies and procedures and ISO 17025.

The FQM will summarize corrective actions generated during the year and report them to management for inclusion in the annual management review.

## **2.4 Records**

The FQM will maintain all records associated with corrective actions. The records may include but are not limited to:

1. SESD Corrective Action Tracking Log (SESDFORM-028)
2. SESD Corrective Action Form (SESDFORM-006)
3. Documentation associated with root cause analysis
4. Documentation associated with solutions to the problem.