

**BMP Element 14 — Nonconformance:
Preventive and Corrective Action
City of Richmond Public Utilities – Wastewater Treatment**

Date of Last Review 11/11/16	Revision 14	Revised By Biosolids Team	Revision Date 10/28/15	Supersedes all previous versions
		Approved By Biosolids Supervisor	Approval Date 10/28/15	

Purpose

The purpose of this BMP element is to develop procedures for identifying, investigating, and taking corrective action(s) for nonconformance.

Scope

This procedure addresses preventive and corrective action(s) to address nonconformances identified during routine monitoring and measurement, audits, and other inspections.

Responsible Staff

The Biosolids Supervisor, in conjunction with the Utility Plant Superintendents I & II are responsible for addressing and tracking identified nonconformance and corrective actions within the biosolids value chain. Utility Plant Operators are responsible for carrying out corrective and preventive actions (CAPAs) related to their job functions.

Procedure

This element is an important key to continual improvement. When elements of the biosolids value chain deviate from requirements, it is necessary to determine the cause, change operating procedures or objectives, change training requirements, and/or address any environmental impacts that may have occurred as a result of the problem. Nonconformance conditions may be discovered in the course of day-to-day biosolids management activities or through a systematic BMP audit process.

1. Legal and regulatory noncompliance that affects, or may potentially affect, the biosolids value chain is dealt with according to the applicable regulatory requirements. Noncompliance also is considered a BMP nonconformance and processed in the same manner as other nonconformance. Deadlines to meet compliance requirements identified

Print date:
4/17/2017

WARNING! This document should be checked against the electronic version to make sure it is the newest version when printed.

Page 1 of 2

*Previous versions or printed copies may be obsolete. Verify current revisions using the "P drive.
P:\BMP - Biosolids\17 Elements\Element 14 - Nonconformance - Preventive and Corrective Actions\Element 14 - Nonconformance - Preventive and Corrective Actions Procedure.doc*

- as nonconformance are strictly enforced. The responsible supervisor must coordinate with the appropriate regulatory agency to request extensions if the supervisor anticipates problems meeting the deadline.
2. Nonconformance identified during internal or third-party audits is addressed using the BMP [Corrective Action Form](#). This form requires a description of the nonconformance, including the root cause of the condition, any applicable regulatory or other requirements, proposed corrective actions, and a description of the action taken to correct the nonconformance, among other information. Nonconformance identified during routine operations is addressed using the corrective action report.
 3. Once information is filled out in the Corrective Action Form, it is considered a Corrective Action Report (CAR).
 4. The Corrective Action Report is given to the appropriate supervisor and he/she will assign responsibility to ensure appropriate steps are taken to correct the nonconformance. The corrective action will be reviewed at subsequent meetings of the BMP Team until the action is verified and accepted and the nonconformance is closed. Review of the nonconformance includes taking steps to prevent any future recurrence of the same or similar nonconformance, such as identifying the root cause, providing additional training, etc. Any required changes to procedures, training, or other processes that are designed to prevent recurrence will be performed and documented before the nonconformance may be considered closed. Steps taken to prevent recurrence will be documented on the CAR. If the deadline for correcting a nonconformance is missed, the Biosolids Supervisor will work with the responsible supervisor to identify any resources required and to resolve the nonconformance as quickly as possible.
 5. Nonconformance associated with equipment or machinery will be assigned, documented, and tracked using the main data saver (Mainsaver). The appropriate supervisor is responsible for identifying the problem, and will notify the Biosolids Supervisor. The Biosolids Supervisor will be notified with updates on the corrective action until the nonconformance is closed.
 6. The Biosolids Supervisor is responsible for verifying the nonconformance has been completed and closed.
 7. Once a year, at a minimum, the effectiveness of all preventive and corrective actions taken will be evaluated. This will normally be performed as part of the annual Biosolids Management Program Performance Report.