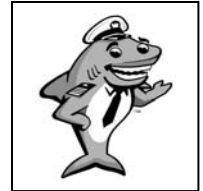


PROCEDURE FOR CORRECTIVE ACTION



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Signature & Date:

Prepared By: EAD
Reviewed By: EMS Core Team
Approved By: Wade Battles



1.0 Policy Reference

Continually evaluate and improve activities and practices to achieve our established goals or meeting and/or exceeding all current Federal and State standards and regulations.

2.0 Purpose

The purpose of this procedure is to establish and outline the process for identifying, documenting, analyzing and implementing preventative and corrective action. The intent of this procedure is to ensure the PHA's EMS contains a process for investigation (audit) and corrective action.

3.0 Scope

Preventative or corrective actions may be initiated using this procedure for any environmental problem affecting the PHA's EMS.

4.0 Responsibility & Authority

4.1 Senior Management

- Responsible for reviewing summary of the Corrective Action Notices (CAN) and/or Preventative Action Notices (PAN) in the senior management review meeting.

4.2 EMS Audit Manager

- Reviewing all CAN/PAN's.
- Authorizing the completion of a CAN/PAN and distributing to the affected facility manager and EAD staff.
- Reviews all CAN/PAN's that have not been completed by the specified due date and meets with the affected facility manager.

4.3 Environmental Affairs Manager/EMS Management Representative

- Assigning EAD staff for investigation of CAN/PANs.
- Reviewing CAN/PAN's with the EMS Audit Manager.

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4.4 Environmental Affairs Department

- ❑ Enters CAN/PAN's into database once authorized by the Environmental Affairs Manager.
- ❑ Determines appropriate due date for resolution and assignment of any additional staff or financial resource identified on a CAN/PAN request.
- ❑ Maintaining all documentation for CAN/PAN's up to two years.
- ❑ Completes CAN/PAN's assigned to the EAD.

4.5 EMS Core Team

- ❑ Responsible for reviewing CAN/PAN's at EMS Core Team meetings.

4.6 Facility Manager

- ❑ Assists the EAD in determining an appropriate due date for the resolution and assignment of any additional staff or financial resources identified on a CAN/PAN request.
- ❑ Completes CAN/PAN's assigned to their Department.

4.7 Public Relations Director

- ❑ Meets with the Environmental Affairs Manager and/or Senior Management when required.

5.0 Procedures

- 5.1 Preventative action is a proactive process intended to prevent potential concerns before they occur or become severe. Preventative actions address the underlying cause(s) of the non-conformance, and are longer-term solutions and typically take more time to implement. Preventative action is initiated by completing a preventative action notice (PAN).
- 5.2 Corrective action is a reactive process to address concerns or issues after they have occurred. A corrective action is initiated by filling out the CAN. The CAN may be the end result of internal or external audits, management, review, and employee request, monitoring, or neighbor complaints.
- 5.3 All CAN or PAN's will be submitted to the Audit Manager. The Environmental Affairs Manager is responsible for determining if the CAN/PAN is appropriate

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- and enters the data into the CAN/PAN database. Responsibility for resolving the CAN/PAN is assigned to a member of the Environmental Affairs Department and a copy of the CAN/PAN request is forwarded to the affected Department Manager.
- 5.4 The EAD and affected department manager(s) will determine an appropriate due date for resolution and assignment of any additional staff or financial resources.
 - 5.5 CAN/PAN's may also be forwarded to senior management and/or the Public Affairs Department, if necessary, for action.
 - 5.6 The CAN/PAN information is entered into the database, which tracks progress and resolution of the CAN/PAN. The Environmental Affairs Manager is responsible for authorizing the completion of the CAN/PAN. The originator of the CAN/PAN will be notified of the completion.
 - 5.7 If a CAN/PAN cannot be resolved by the specified due date, the Environmental Affairs Manager and affected department manager will review the information and assign an alternative due date.
 - 5.8 If the resolution of the CAN/PAN are later deemed not effective, the CAN/PAN will be re-issued by the EAD or the affected department manager.
 - 5.9 PAN/CAN's will be retained by the EAD for at least two years after final resolution.
 - 5.10 During the first EMS Core Team meeting of each year, the Environmental Affairs Manager will review all CAN/PAN's from the previous year.

ALL INCIDENTS, ACCIDENTS, SPILLS, RELEASES AND EMERGENCIES SHALL BE DEALT WITH THROUGH THE EMERGENCY RESPONSE PROCEDURES.

6.0 Related Documentation

- 4.2.51 EAD Compliance Manual
- 4.3.12 Legal and Other Requirements Procedure
- 4.5.11 Corrective Action Form
Preventative Action Form