



SEMP-15		U.S. Army-Hawaii	
PROCEDURE: Nonconformity, Corrective Action and Preventive Action		DATE: 24 June 2010	Page 1 of 4
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1. Purpose

This procedure establishes a standardized process for defining, identifying, and investigating Sustainable Environmental Management (SEM) actual and potential nonconformities at U.S. Army Hawaii. It also establishes a process to mitigate, prevent, and implement corrective actions related to SEM nonconformities.

2. Definitions

Definitions and acronyms are included in the SEM Manual.

3. Requirement [ISO 14001:4.5.3] and Procedure

ISO Requirement	Procedure
The organization shall establish, implement and maintain a procedure for dealing with actual and potential nonconformity and for taking corrective action and preventive action. The procedure shall define requirements for	The results of monitoring and measurement (SEMP-13), evaluation of compliance (SEMP-14), internal audit (SEMP-17) and other systemic procedures are evaluated by appropriate personnel.
a) identifying and correcting nonconformity and taking action to mitigate their environmental impacts,	For identified nonconformities, corrective actions are taken appropriate to their level of significance. Corrective action plans may be created to ensure that corrective actions needing long term resolution are implemented.
b) investigating nonconformity, determining their cause and taking actions in order to avoid their recurrence,	Corrective actions can include the following: on-the-spot fix, inspection follow-up, verbal direction, written direction, informal acknowledgement, formal agreement, enforcement requirement, project execution, in-house labor/material, or contract work. Actions are usually dealt with at the lowest level possible, however repeat violations and more serious issues are elevated to the highest levels.
c) evaluating the need for action to prevent nonconformity and implementing appropriate actions designed to avoid their occurrence,	Unlike corrective actions, which imply a reactive practice used to address problems after they have occurred, preventive actions imply a proactive practice intended to prevent potential problems before they occur or become significant. Preventive action focuses on identifying negative trends and addressing them before they become problems. Events that may trigger a preventive action include the results of monitoring and measurement, trend analysis, tracking of progress at achieving objectives and targets, response to emergencies, and community complaints.

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d) recording the results of corrective action and preventive action taken, and	Records of results can include the following: photograph, email message, memorandum, checklist, analysis, survey, report, project or contract. A record of the corrective or preventive action taken will be kept on the Environmental Division shared drive.
e) reviewing the effectiveness of corrective action and preventive action taken.	Corrective actions are followed up, as appropriate, by future reviews to gauge the effectiveness of corrective and preventive actions.
Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.	An incremental step approach is followed. For less serious or potential nonconformities, a verbal warning can be issued. For serious, repeated or purposeful nonconformities, written actions involving the appropriate level within the Chain of Command for person or department that is not conforming can be initiated.
The organization shall ensure that any necessary changes are made to environmental management system documentation.	Required changes to the SEM documentation, identified as part of this corrective and preventive action process, are scheduled and coordinated as described in the Responsibilities section below.

4. Responsibilities

Responsible Party	Responsibilities
Installation Management Command (IMCOM), Army Environmental Command (AEC)	<ul style="list-style-type: none"> • Reviews/tracks status of corrective and preventive actions identified as part of external EPAS evaluations and SEM audits.
Garrison Commander (GC)/ Sustainable Environmental Management Representative (SEMR)	<ul style="list-style-type: none"> • Reviews nonconformity issues that have been forwarded by the IEDC and directs units/organizations to implement changes as necessary. • Ensures appropriate Command emphasis and resources are allocated to implement corrective and preventive actions and promote continual improvement of the SEM.
Installation Environmental Division Chief (IEDC)	<ul style="list-style-type: none"> • Reviews any documented corrective action requests and forwards nonconformity issues to top management and the GC as required. • If deemed necessary, will pursue written action against a party that is not in conformance while weighing the seriousness and frequency of occurrence of the nonconformity.
SEM Program Manager (SEMPM)	<ul style="list-style-type: none"> • Makes changes in SEM procedures and documentation resulting from a corrective and preventive action, as necessary. • Submits the documentation to the IEDC for review and approval. • Tracks and reports, to higher Commands (e.g. IMCOM, AEC), the status of corrective and preventive actions identified as part of external EPAS

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	evaluations and SEM audits.
Environmental Division Staff	<ul style="list-style-type: none"> • Maintains a record of all corrective and preventive actions that result in action plans for their respective program areas. • Investigates documented nonconformities to determine cause and identifies possible steps to prevent recurrence. • Follows-up with affected units/organizations to ensure that the corrective and preventive actions were completed. • Evaluates the effectiveness of corrective and preventive actions taken and recommends changes as necessary. • Brief the GC and EQCC members, as necessary, on the status of corrective and preventive actions identified as part of internal and external compliance evaluations and SEM audits.
Environmental Quality Control Committee (EQCC) Members	<ul style="list-style-type: none"> • Review nonconformity issues within their respective unit/organizations and implement changes as necessary.
Cross Functional Team (CFT) Members	<ul style="list-style-type: none"> • Review nonconformity issues within their respective unit/organizations and implement changes as necessary. • Report successes or challenges in implementing corrective and preventive actions to their Supervisors, SEMPM or the Environmental Division. • Provide inputs for management reviews during the CFT meetings.
Unit Commanders, Department Heads, Directors and Supervisors	<ul style="list-style-type: none"> • Review nonconformity issues within their respective unit/organizations and implement changes as necessary.
Environmental Compliance Officers (ECOs)	<ul style="list-style-type: none"> • Review nonconformity issues within their respective facility and implement changes as necessary. • Report any successes or challenges in implementing corrective and preventive actions to their Supervisors, CFT representatives or the Environmental Division.
Activity and Process Owners	<ul style="list-style-type: none"> • Implement changes in work practices as identified in corrective and preventive action plans. • Report any successes or challenges in implementing corrective and preventive actions to their Supervisors, ECOs, CFT representatives or the Environmental Division.
General Workforce (Military, Civilian, and other employees)	<ul style="list-style-type: none"> • Implement changes in work practices as identified in corrective and preventive action plans. • Report any successes or challenges in implementing corrective and preventive actions to their Supervisors, ECOs, CFT representatives or the Environmental Division.

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Contractors	<ul style="list-style-type: none"> • Responsible for knowing and abiding by the environmental regulations and installation applicable operational controls pertaining to the activities, product and/or services provided to the U.S. Army-Hawaii as part of their contracts. • Conduct applicable internal environmental compliance inspections of their operations.
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5. References

- ISO 14001:2004(E), 4.5. Nonconformity, Corrective Action and Preventive Action
- U.S. Army Hawaii SEM Manual
- SEMP-13, Monitoring and Measurement
- SEMP-14, Evaluation of Compliance
- SEMP-17, Internal Audit

Revision Date	Nature of Revision	Document Review Participants
24 Jun 10	Updated to address internal audit finding	Jeff Stefani

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