

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

**OPERATING PROCEDURE**


**Title: Control of Nonconforming Work**

**Effective Date:** July 8, 2010

**Number:** SESDPROC-019-R2


**Authors**

Name: Liza Montalvo  
Title: Environmental Engineer

Signature:  Date: 7/6/2010

**Approvals**

Name: Archie Lee  
Title: Chief, Enforcement and Investigations Branch

Signature:  Date: 7/6/2010

Name: Bill Cosgrove  
Title: Chief, Ecological Assessment Branch

Signature:  Date: 7/6/10

Name: Liza Montalvo  
Title: Field Quality Manager, Science and Ecosystem Support Division

Signature:  Date: 7/6/2010

## Revision History

---

This table shows changes to this controlled document over time. The most recent version is presented in the top row of the table. Previous versions of the document are maintained by the SESD Document Control Coordinator.

History	Effective Date
<p>SESDPROC-019-R2, <i>Control of Nonconforming Work</i>, replaces, SESDPROC-019-R1</p> <p><b>Title Page:</b> Changed the following: Author from Laura Ackerman to Liza Montalvo; Enforcement and Investigations Branch Chief from Antonio Quinones to Archie Lee; and Field Quality Manager from Laura Ackerman to Liza Montalvo.</p> <p><b>Section 1.3:</b> Omitted reference to the H: drive.</p> <p><b>Section 2.3:</b> In the third sentence changed Section 2.5 to 4.2.</p>	<p>July 8, 2010</p>
<p>SESDPROC-019-R1, <i>Control of Nonconforming Work</i>, replaces SESDPROC-019-R0.</p> <p><b>Revision History</b>            Changed Field Quality Manager to Document Control Coordinator.</p> <p><b>Section 1.3</b>            Changed Field Quality Manager to Document Control Coordinator.</p> <p><b>Section 2.1</b>            Editorial changes. No change to content.</p> <p><b>Section 2.2</b>            Editorial changes to first paragraph.</p> <p>Amended stop work authority to include project leaders, laboratory analysts and management as well as the FQM. Added Notes 1 and 2.</p> <p>Deleted language regarding suspected nonconformances and determination of whether a suspected nonconformances is deemed a nonconformance. Replaced with current items 3, 4, 5, and 6.</p>	<p>February 11, 2008</p>

Deleted requirement to notify affected management and staff verbally, via email or memorandum when notifying individuals when it is appropriate to resume work.  <b>Section 2.3</b> Deleted verbally from second sentence.	
SESDPROC-019-R0, <i>Control of Nonconforming Work</i> , Original Issue	October 10, 2007

## TABLE OF CONTENTS

<b>1</b>	<b>General Information.....</b>	<b>5</b>
1.1	Purpose .....	5
1.2	Scope/Application .....	5
1.3	Documentation and Verification .....	5
1.4	References.....	5
<b>2</b>	<b>Methodology.....</b>	<b>6</b>
2.1	General.....	6
2.2	Control of Nonconforming Work.....	6
2.3	Recalled Data.....	7
2.4	Records .....	7

# 1 General Information

---

## 1.1 Purpose

This document defines the procedure used to identify, evaluate, and address any aspect of work conducted by the SESD field branches or results of work conducted by the SESD field branches which does not conform to the policies and procedures in the field branches quality system or the agreed upon requirements of the customer.

## 1.2 Scope/Application

This procedure applies to all work conducted by personnel within the SESD field branches.

## 1.3 Documentation and 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 References

SESD Operating Procedure for Corrective Action (SESDPROC-009, most recent version)

Control of Nonconforming Work Form (SESDFORM-027, most recent version)

SESD Operating Procedure for Preventive Action and Quality Improvement (SESDPROC-017, most recent version)

SESD Operating Procedure for Report Preparation and Distribution (SESDPROC-003, most recent version)

## 2 Methodology

---

### 2.1 General

Identification of nonconforming work or problems with the management system or sampling, measurement or analytical activities can occur at various points within the management system and technical operations. Nonconforming work may be identified several ways including, customer complaints, quality control, instrument calibration, checking of consumable supplies, staff observations, report reviews, management reviews and internal and external audits.

### 2.2 Control of Nonconforming Work

A nonconformance occurs anytime there is a departure from the policies and procedures in the SESD quality system or technical operations or when there is an absence of a specified requirement. Nonconformances will require a formal corrective action if 1) there is potential for the nonconformance to recur somewhere else in the quality system or, 2) if there is an adverse impact on the quality of the work generated. The corrective action will explore the root cause of the nonconformance and provide a plan for eliminating the root cause.

Personnel within the field branches will address nonconformances according to the following procedure.

1. When nonconforming work occurs within the field branches, project leaders, laboratory analysts, management and the Field Quality Manager (FQM) have the authority and responsibility to stop work if appropriate.

**NOTE 1: Field investigators that identify nonconforming work during field operations will notify the Project Leader as soon as possible. Project Leaders will determine if it is necessary to stop work during field operations.**

**NOTE 2: All field investigators are authorized to stop work due to safety concerns.**

2. Whenever a nonconformance occurs, field and laboratory personnel will take immediate action to correct the issue if appropriate.
3. The individual who identified the nonconformance will complete the Control of Nonconforming Work Form (SESDFORM-027) and notify the Field Quality Manager as soon as possible.
4. The Field Quality Manager in consultation with management will evaluate the significance of the nonconformance.
5. The FQM will determine if there is potential for the nonconformance to recur somewhere else in the quality system or if there is an adverse impact on the quality of the work generated. If so, it will be addressed through formal corrective action.

6. If the nonconformance is not addressed through the corrective action process, it will be evaluated by the FQM to determine if it is an opportunity for a Preventive Action or Quality Improvement.
7. Affected management and the Field Quality Manager in consultation with the project leader or laboratory analyst will determine if the results generated from the nonconforming work are acceptable or if the work should be repeated.
8. Affected management and the Field Quality Manager will also determine if the customer should be notified of the nonconformance and if any previously released data should be recalled.
9. If work was stopped due to the nonconformance, the Field Quality Manager or management will determine when it is appropriate for work to resume.

### **2.3 Recalled Data**

If it is necessary to recall data due to a nonconformance, it will be the responsibility of the affected management to contact the customer and notify them of the recalled data. This may be done via email or a memorandum. If it is necessary to issue another report, this will be handled in accordance with Section 4.2 of the SESD Operating Procedure for Report Preparation and Distribution (SESDPROC-003). Copies of any correspondence with the customer regarding recalled data should be forwarded to the Field Quality Manager.

### **2.4 Records**

Information related to occurrences of nonconforming work will be recorded on the SESD Control of Nonconforming Work Form (SESDFORM-027). The FQM will maintain all records associated with occurrences of nonconforming work. These records may include:

1. SESD Control of Nonconforming Work Form (SESDFORM-027)
2. Notification for stopping work (emails, memos, verbal communication)
3. Records of customer notification (emails, memos, verbal communication)
4. Records of recalled data (emails, memos, verbal communication)
5. Notification for resuming work (emails, verbal communication).