

Using a Corrective Action Process - Yes You CAN

Presented by Greg Gilani

Summary

- Importance of a corrective action process
- ARB's Corrective Action Notification (CAN) process
- Examples of when to initiate a CAN form

Background

- 2011 U.S. EPA TSA Finding G5 -

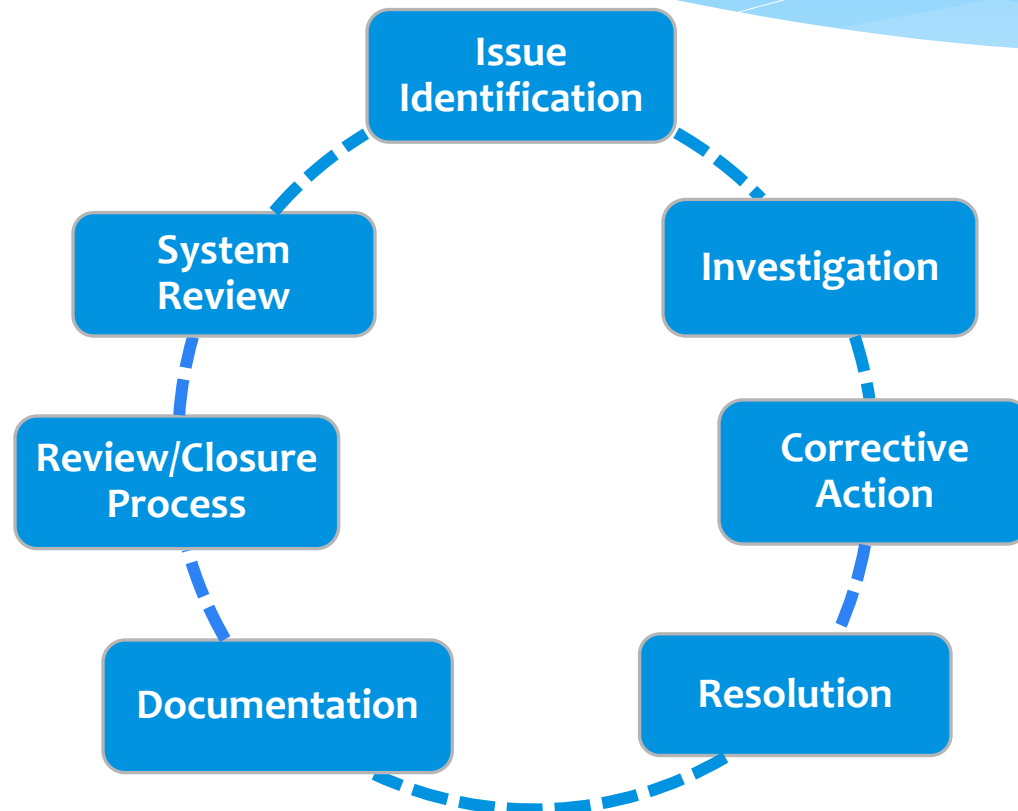
“CARB PQAQO has not established a corrective action process that is comprehensive and can be initiated by CARB or district staff.”

- The Air Quality Data Action Request (AQDA) process was the only formal corrective action process in place

What are important components of a corrective action process?



Major Components of a Corrective Action Process



ARB's Corrective Action Notification (CAN) Process

- ARB's CAN form and SOP are available on the QA website here:
http://www.arb.ca.gov/aaqm/qa/pqao/pqao_can.htm
- Before using the CAN process, read the SOP
 - SOP Questions: Greg Gilani – (916) 445-9391

The image shows a sample of the California Air Resources Board's Corrective Action Notification (CAN) form. The form is titled "California Environmental Protection Agency Air Resources Board Corrective Action Notification". It includes sections for "Section I: (to be completed by initiator)" and "Section II: (to be completed by responsible action or organization)". Section I contains fields for Initiator, Subject, Date, Agency, Reason for Corrective Action Notification, Start Date & Time, Parameter(s) affected, Supervisor, End Date & Time, Expected Completion Date, and Estimated? Section II contains fields for Corrective Action Taken, Action taken by, Resolution, Resolved by, Forward to, and CAN # assigned. The form also includes a footer with contact information for Michael Miguel, PQAO Point of Contact, and the form number MLD/QMS-004 (new).

ARB's Corrective Action Notification (CAN) Process

- Using CANs for internal issues? – follow the steps that keep ARB in the loop
- The CAN SOP was recently updated to allow for anonymous initiation

California Environmental Protection Agency
Air Resources Board
Corrective Action Notification

This form is used to document issues that may impact or potentially impact data quality, completeness, storage, or reporting.

Section I: (to be completed by initiator)

Initiator: _____ Date: _____
Subject: _____ Agency: _____
Reason for Corrective Action Notification (continue on an attachment if needed): _____
Start Date & Time: _____ End Date & Time: _____
Parameter(s) affected: _____ Expected Completion Date: _____
Supervisor: _____ Date: _____
Estimated? ☐

Section II: (to be completed by responsible section or organization)

Corrective Action Taken (continue on an attachment if needed): _____
Action taken by: _____ Date: _____
Resolution (continue on an attachment if needed): _____
Resolved by: _____ Date: _____

Forward to: Michael Miguel, PQAO Point of Contact, PO BOX 2815, Sacramento, California 95812;
mmiguel@arb.ca.gov
For questions regarding the CAN process, contact PQAO@arb.ca.gov

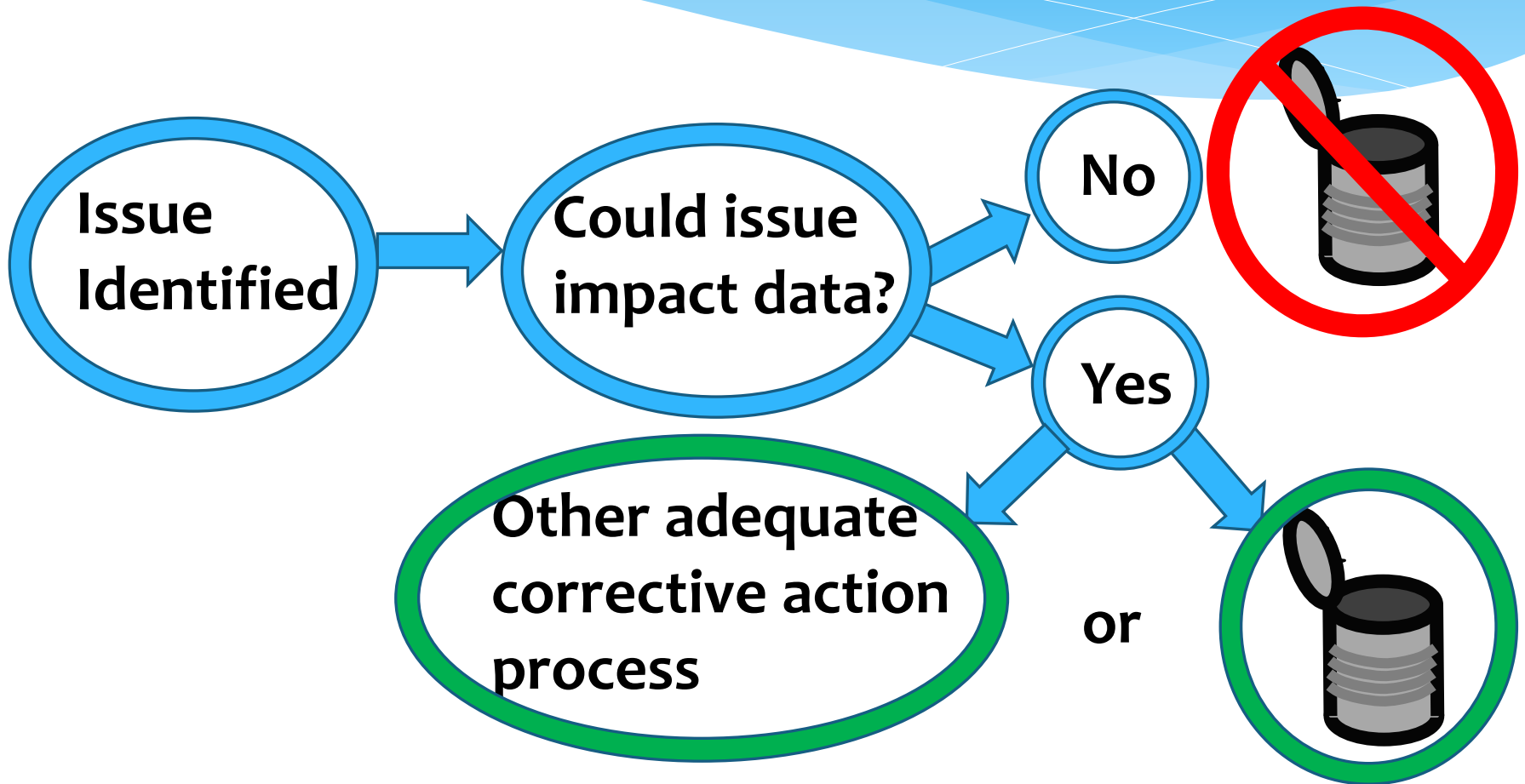
California Air Resources Board CAN # assigned: _____
MLD/QMS-004 (new)

When to initiate a CAN?

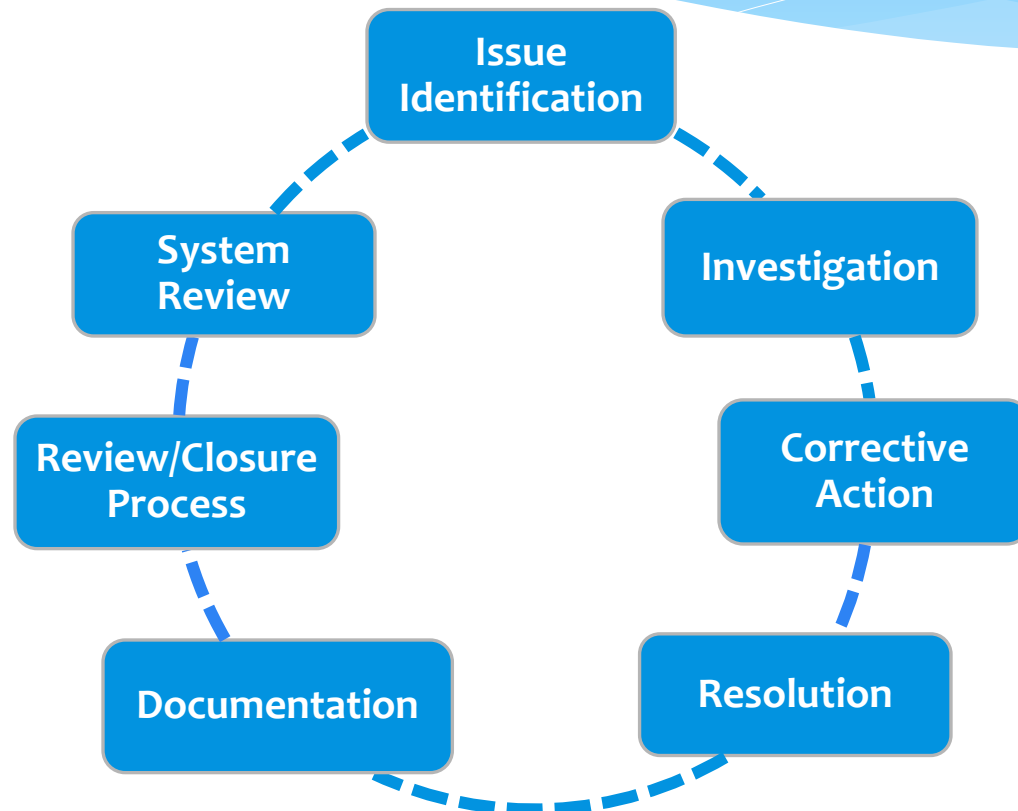
- Anyone in the ARB PQAO may initiate a CAN.
- Do not initiate a CAN for common issues with an adequate corrective action process already in place.
- All issues that may impact data need to be resolved using an adequate corrective action process.



When to initiate a CAN?



Major Components of a Corrective Action Process



Using a CAN Form

California Environmental Protection Agency
Air Resources Board

This form is used to report requests that may impact or potentially impact data quality, compliance, or other issues that may be completed by Initiator.

Initiator: _____ Date: _____
Subject: _____ Agency: _____

Reason for Corrective Action Notification (continue on an attachment if needed):

Start Date & Time: _____ End Date & Time: _____ Estimated? ☐
Parameter(s) affected: _____ Expected Completion Date: _____
*Up to 45 days from Initiation Date

Supervisor: _____ Date: _____

Section II: Resolution

Corrective Action Taken (continue on an attachment if needed):

Action taken by: _____ Date: _____

Resolution (continue on an attachment if needed): *Include changes to permit, instrument, and any other data.

Resolved by: _____ Date: _____

Forward to: Michael Miguel, PQAO Point of Contact, PO BOX 2815, Sacramento, California 95812;
mmiguel@arb.ca.gov

For questions regarding the CAN process, contact PQAO@arb.ca.gov CAN # assigned: _____

California Air Resources Board MLD/QMS-064 (new)

Section I: (to be completed by Initiator)

Initiator: _____ Date: _____
Subject: _____ Agency: _____

Reason for Corrective Action Notification (continue on an attachment if needed):

Start Date & Time: _____ End Date & Time: _____ Estimated? ☐
Parameter(s) affected: _____ Expected Completion Date: _____
*Up to 45 days from Initiation Date

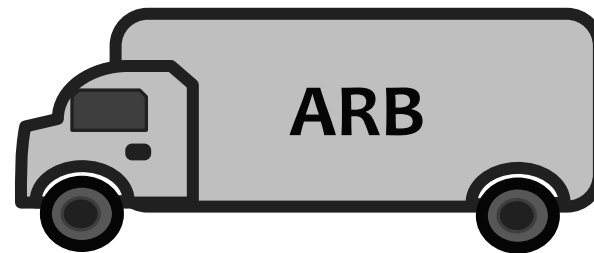
Supervisor: _____ Date: _____

CAN Initiation - Example Issues

- Anomalous trends in data
- Instrument malfunctions (monitors, data loggers, etc.)
- PM monitors reporting in the wrong conditions (STP vs LC)
- U.S. EPA and/or ARB recommended practices (identified in the QA Handbook and ARB quality management documents) not followed
- Critical or operational criteria not being met

Auditors Use AQDAs and CANs

- ARB auditors will use:
 - Internal AQDA request process when audit criteria or critical criteria are not met
 - CANs when other issues that may impact data are observed





Don't Play Kick the CAN

- Address the issue in a timely manner
- If you aren't the appropriate contact, let ARB and the initiating group know



Annual CAN Report

- The 2013 CAN report was sent to PQAO Contacts in May 2014
- In 2013:
 - 54 CANs were initiated
 - 10 CANs led to invalidation or flagging of data
 - PQAO wide need to review quality assurance requirements and documentation practices
- The 2014 CAN summary report is being developed

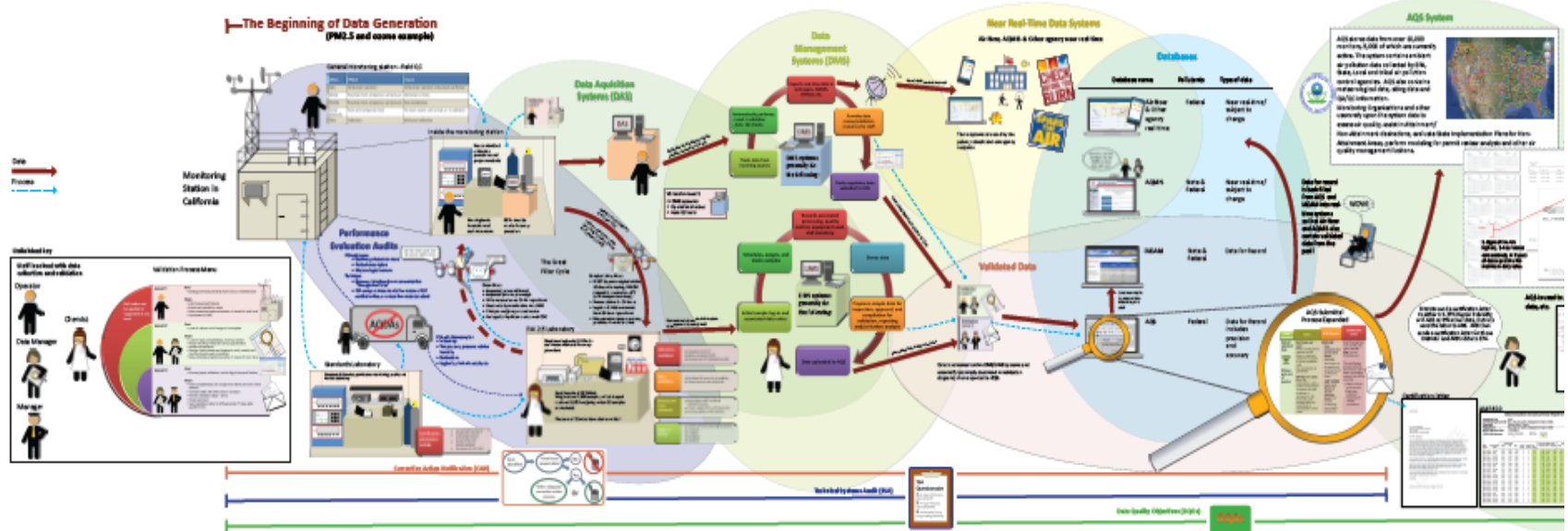
Scenario 1

- Ozone data missing from a nearby site in AQMIS2
- Should a CAN be initiated?
 - Call the site supervisor to gather information on the issue
 - Ensure the current corrective action process is adequate

Scenario 2

- The flow rate on your BAM repeatedly drops down below the allowable range and you have to invalidate multiple hours of data.
- Should a CAN be initiated? Yes

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Questions?

- Greg Gilani – Contact Information:
 - (916) 445-9391
 - greg.gilani@arb.ca.gov