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
2011 U.S. EPA TSA Finding G5 -

“CARB PQAO 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

- Issue Identification
- Investigation
- Corrective Action
- Resolution
- Documentation
- Review/Closure Process
- System Review
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
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
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?

- Issue Identified
- Could issue impact data?
  - No
  - Yes
    - Other adequate corrective action process
    - or
Major Components of a Corrective Action Process

1. Issue Identification
2. System Review
3. Review/Closure Process
4. Documentation
5. Investigation
6. Corrective Action
7. Resolution
8. Process System Review
9. Review/Closure Process
10. Documentation

11. Issue Identification
12. System Review
13. Review/Closure Process
14. Documentation
15. Investigation
16. Corrective Action
17. Resolution
18. Process System Review
19. Review/Closure Process
20. Documentation

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Using a CAN Form

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: ________________
• 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
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
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.
Scenarios 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
Questions?

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