

Chapter 6 Communication, Nonconformity, Corrective and Preventive Actions, Environmental Performance

6.1 Overview

Introduction Elements of the EMS, including communication, nonconformity, corrective and prevention actions, and environmental performance are presented in this chapter.

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6.2 Internal Communication

Background Effective communication with both internal and external stakeholders is an essential component of the WSDOT EMS. Internal and external communication is used to disseminate information relevant to the EMS and its requirements, and WSDOT environmental compliance and performance. Additionally, it is critical to implement systems that allow key stakeholders, both internal and external, to provide recommendations or comments regarding WSDOT's EMS or this EMP. This input is important for establishing or revising environmental practices. Systems are in place to provide information about the EMS and for WSDOT to receive, document, and respond to relevant inquiries or comments from staff.

Application This procedure applies to all Materials Lab staff.

Policy Through effective internal communication, WSDOT is committed to increasing employee awareness, understanding, cooperation, involvement, and ownership of key environmental aspects associated with the day-to-day and long-term compliant operation of the Materials Lab.

Means of Internal Communication Internal communication is accomplished at WSDOT through both formal and informal means. Formal internal communication includes Employee Orientation, training, meetings, and Reports. Informal internal communication includes electronic mail and open discussion. Each of these means of communication are further discussed below:

Communication	Function
Employee Orientation	New employees at the Materials Lab will receive basic awareness orientation training that includes the following: <ul style="list-style-type: none"> • Legal requirements, roles and responsibilities • Operating policies and procedures • Opportunities to obtain more information or formal training • Contents of this Environmental Health and Safety Manual • Hazard communication • Basic lab safety

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6.2 Internal Communication, Continued

Means of Internal Communication (continued)

Communication	Function
Meetings	<p>Meetings are employee gatherings that normally follow a specific agenda and may have minutes prepared. Meetings are formal methods of directly communicating information and can be held for a variety of purposes, including coordinating job-related activities, conducting strategic planning, and discussing critical health and safety awareness issues. Examples of internal meetings at the Materials Lab include:</p> <ul style="list-style-type: none"> • Safety meetings where employees and management discuss safety-related incidents and practices in order to promote awareness and foster a safer work environment • Section and staff meetings, where team members gather to coordinate job-related activities • Leadership meetings where senior management discusses, organizes, and plan activities related to planning and environmental compliance.
Reports	<p>Reports are formal written documents prepared to communicate specific ideas, information, or topics. Reports are used to provide periodic updates, communicate required or requested information, or present a plan of action.</p>
Bulletin Boards	<p>Facility personnel can view Materials Lab announcements on bulletin boards. Bulletin boards are also used to convey labor law and safety-related communications. Employees are encouraged to view the bulletin boards periodically and are held accountable for the information posted.</p>
Electronic Mail	<p>Materials Lab personnel use electronic mail to quickly convey and share information (for example, reports, notices, announcements, etc), and schedule and confirm meetings.</p>
Open Discussion	<p>Open discussion is direct communication between employees and is used as a first choice for conveying information. Open discussion is encouraged between all employees to communicate and share ideas and information.</p>

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6.2 Internal Communication, Continued

Training	Lab employees will be informed of this policy during the Environmental Health and Safety Manual Training course.
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Records	Records of training will be maintained in the WSDOT Automated Training Management System (ATMS).
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6.3 External Communication

Background	<p>Effective communication with both internal and external stakeholders is an essential component of the WSDOT EMS. Internal and external communications are used to disseminate information relevant to the EMS and its requirements, and WSDOT environmental compliance and performance. Additionally, it is critical to implement systems that key stakeholders, both internal and external, can use to provide recommendations or comments regarding WSDOT EMS or this EMP. This input is important for establishing or revising environmental practices.</p> <p>Systems are in place to provide information about the EMS and for WSDOT to receive, document, and respond to relevant inquiries or comments from staff and the public related to environmental performance or the EMS. As part of its overall EMS implementation, WSDOT has developed a system to communicate with other interested parties outside the agency.</p>
Application	<p>This procedure applies to all Materials Lab staff who receive and distribute information related to environmental management between the Materials Lab and external interested parties.</p>
External Interested Parties	<p>Stakeholders such as WSDOT customers, regulatory agencies, environmental groups, and the public.</p>
Policy	<p>WSDOT is committed to providing timely responses to external queries or requests for information. Responses will be provided in accordance with the WSDOT Communication Policies. Any questions should be forwarded to the Lab Administrative Officer for handling.</p>
Procedure	<p>Refer to the WSDOT Communications Office for guidance.</p>
Training	<p>Lab employees will be informed of this policy.</p>
Records	<p>Records of external communication will be maintained by the Lab Administrative Officer.</p>

6.4 Nonconformity, Corrective Action, and Preventive Action

Background	As part of its EMS implementation, WSDOT has developed a process by which deviations from the EMS or difficulties in implementing the EMS can be identified and corrected.
Application	It is the responsibility of all Lab employees involved with the implementation of the EMS to follow the “Nonconformance and Corrective and Preventive Action” procedures to report any EMS problems or improvement opportunities. Knowledge of various problems or improvement opportunities could come about through internal audits, external audits, environmental incidents, complaints, inspections, failures to meet objectives and/or targets, preventive action suggestions, and other employee input.
Definitions	<p>The terms non-conformance and non-compliance are defined as follows:</p> <ul style="list-style-type: none">• Non-conformance: Any deviation from established procedures, programs, and other arrangement related to the EMS. It may include non-compliance with regulations, but not every situation of non-compliance is necessarily non-conformance with the EMS. An EMS audit (internal or third-party) makes findings of non-conformance.• Non-compliance: Failure to meet regulatory or other requirements that have been imposed on the Materials Lab. A compliance audit makes findings of non-compliance.
Policy	All employees will inform their supervisor of environmental issues or concerns (for example, faulty or unsafe process, suggested improvements to the process, etc.). If appropriate, employees will submit a Corrective and Preventive Action Request Form. Whenever a compliance assurance procedure is triggered, that procedure shall be followed.
Corrective Action Procedure	Implement appropriate actions to avoid their recurrence, such as informing the responsible party, providing additional training, and instituting additional safeguards.
Training	Lab employees will be informed of this policy during the periodic staff and/or safety meetings.
Records	Records of corrective actions or recommendations and the actions taken with regard to each will be maintained by the WSDOT Materials Engineer.
