



INSTRUCTION FOR ESTABLISHING THE REASONS FOR THE ESTABLISHED NON-COMPLIANCES AND TAKING CORRECTIVE ACTIONS

EA-I 10

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1.0 Aim/Scope

This instruction defines the ways and responsibilities for establishing the reasons for the established non-compliances and taking corrective actions.

2.0 Affected activities

- Collection and temporary storage of hazardous waste – used oils.

3.0 Records form

EA-R 16 - Non-compliance register
EA-R 17 - Corrective actions register

4.0 References

Waste Permit (not yet issued)

5.0 Definitions

- Non-compliance – non-fulfilment of a regulatory requirement regarding the environment or a condition set in the Waste Permit.
- Short-term corrective action - Action to limit or stop the environmental impact after caused non-compliance (including spills or leakages)
- Long-term corrective action - Action to remove the reason of the non-compliance.
- Preventive action – Actions to implement a technique or production practice to prevent re-occurring of the same or similar non-compliance.

6.0 Instruction

6.1 Identification of a non-compliance - All employees of the Company have an obligation to inform the Site Operational Manager in case of doubts or findings of non-compliances with the conditions of the Waste Permit. Upon receipt of information about the existence of a non-compliance, the Site Operational Manager is obliged to check the signal.



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- 6.2 Registration of a non-compliance** - for each detected non-compliance the Site Operational Manager must fill in *EA-R 16 - Non-compliance register*, including:
- Affected area/unit.
 - Description of the non-compliance.
 - Date of the finding.
 - The names of the person who has been registered the non-compliance.
- 6.3 Description of the non-compliance** - The Site Operational Manager, together with the person responsible for the violated condition of the Waste Permit and, if necessary, other persons, become familiar with the non-compliance. They analyse the reasons for reaching the discrepancy.
- 6.4 Corrective actions** - The Site Operational Manager, together with the responsible person for the non-compliance and, if necessary, other persons, determine:
- Short-term corrective action
 - Long-term corrective action
 - Preventive action
- The Site Operational Manager sets deadlines and appoints responsible persons for the implementation of the corrective measures.
- 6.5 Control of the implementation of the corrective actions** - The Site Operational Manager, after completion of the relevant corrective actions, check their effectiveness and fills in *EA-R 17 - Corrective actions register*

7 Records

- 7.1 Type of Records** – All records are kept electronically. They shall be printed out at the end of each year or upon request by the competent authority.
- 7.2 Compliance** – The records must be stored in accordance with Procedure EA-P 04 – Documents management