

Tennessee Department of Transportation Division of Materials and Tests

Procedure for Corrective Action Response to Ready Mix Deficiencies

Purpose - The purpose of this document is to provide a procedure for corrective actions to ready mix deficiencies and how they are applied within the TDOT Ready Mix Concrete Program.

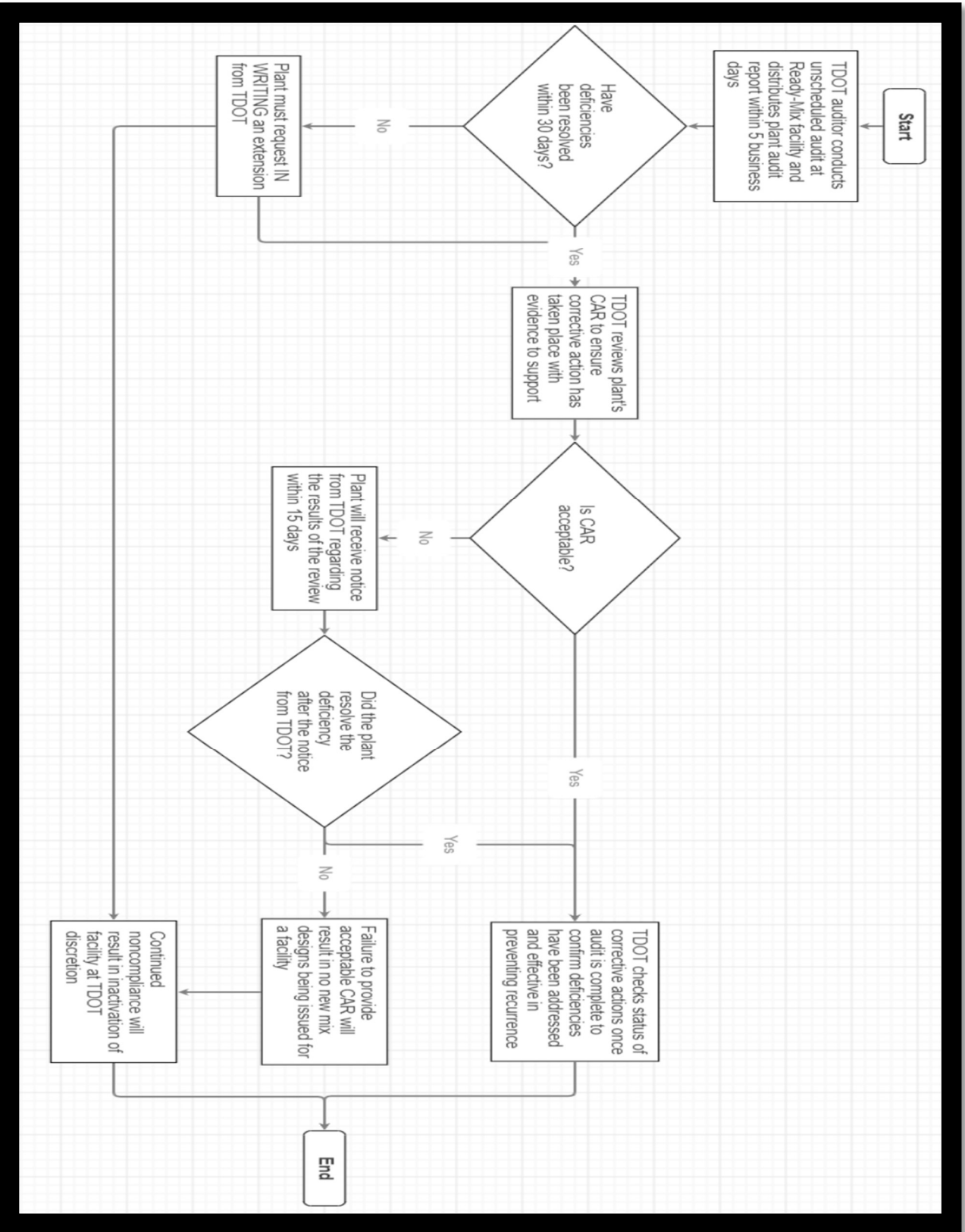
Background - TDOT Materials and Tests' periodic plant audits are only one important facet of ensuring compliance with TDOT Standard Specifications (Spec) and Standard Operating Procedures (SOP's). To be fully effective, the audit must be followed by an evaluation of the findings, identification of areas requiring improvement, implementation of appropriate and long-lasting corrective actions addressing the root causes of any noncompliant areas, and annual audits from Regional Materials and Tests staff to ensure the corrective actions are effective.

The procedure is followed using four main steps:

1. TDOT auditor distributes plant audit reports within 5 business days from the date the audit was conducted. The audit report includes a detailed checklist of required equipment and documentation as well as a summary of deficiencies found. The audit reports also include a request for the plant to take appropriate corrective actions and provide a Corrective Action Response (CAR) for any deficiencies noted in the report.
2. Effective immediately, TDOT requires that a CAR form listing each deficiency be submitted to Headquarters Materials and Tests (HQMT) and Regional Materials and Tests Staff within 30 days of receipt of the audit report.
 - a. For all deficiencies, the plant must detail the corrective actions taken or planned to be taken and include objective evidence substantiating the action(s) taken to resolve the deficiencies. Corrective actions must be documented on TDOT's Standard Plant Certification Program Corrective Action Response (CAR) Form.
 - i. In general, the plant's CARs should describe: the immediate actions taken to eliminate the current deficiencies; any controls the plant has established or intends to establish to mitigate/prevent recurrence, such as substituting or upgrading equipment, revisions to the quality system, or additional employee training; and an appropriate solution that should prevent the problem(s) from happening again, which could include what actions will be taken, who will implement those actions, where the actions will take place, and how often the actions will occur.

- ii. Resolution of deficiencies requires that the plant provide objective evidence fully documenting resolution. Objective evidence may be in the form of revisions to procedures, photos, personnel certification records, or other data.
 - b. All corrective actions must be established, implemented, and documented to resolve open deficiencies. The plant must consider the immediate actions they will take to satisfy TDOT standards, intermediate actions to help eliminate deficiencies, and long-term actions to ensure the problem does not happen again.
 - c. If more than 30 days are needed to resolve deficiencies, the plant must request, **in writing**, an extension from TDOT. Requests for an extension must be accompanied by a schedule for resolving the deficiencies that includes a reasonable estimate of when they will be resolved and a brief description of how they will be resolved. In all cases, deficiencies are expected to be resolved before the next TDOT audit. If the plant cannot meet this requirement, then the reasons must be fully explained.
- 3. TDOT will review the plant's CAR's to ensure the plant has established a corrective action/preventive action plan and included any applicable objective evidence that supports the corrective actions taken to verify the plant has addressed each current or unresolved deficiency.
 - a. TDOT communicates to the plant whether their submitted CAR's are acceptable and tracks all open nonconformances to ensure they are resolved in a timely manner.
 - b. If the plant's CAR was not approved by TDOT, the corrective action and any required objective evidence should be reevaluated. The plant will receive a notice from TDOT regarding the results of the review of their planned corrective actions within 15 calendar days of TDOT's receipt of the CAR form. If the CAR is not accepted or did not adequately address all deficiencies, the plant is given another 5 calendar days to resubmit the CAR form and provide TDOT with enough documentation of actions to resolve deficiencies.
- 4. The auditor will follow up on all corrective actions. TDOT checks the status of corrective actions once this audit is complete to confirm that the plant's established corrective actions have been effective in preventing recurrence of the deficiency. If the deficiency recurs during the subsequent audit, the corrective action must be reevaluated, and the plant must complete an additional CAR form. TDOT reserves the right to conduct separate follow-up audits of plants to determine that deficiencies have been satisfactorily resolved.
 - a. Failure to comply will ultimately result in no new mix designs being issued to the facility.
 - b. **Continued noncompliance will result in inactivation of facility at TDOT discretion.**

Figure 1: A simplified visual flow chart overview of the process





Ready Mix Deficiency Corrective Action Response Form

Date: _____

Producer: _____ Location: _____

Plant QC Technician: _____ Certification Number: _____ Region: _____

Plant Address: _____

TDOT Deficiency No.	Brief Description of Deficiency	Producers Corrective Action(s)*	Resolved (To be determined by TDOT Auditor)	
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No

TDOT Deficiency No.	Brief Description of Deficiency	Producers Corrective Action(s)*	Resolved (To be determined by TDOT Auditor)	
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No
			<input type="checkbox"/> Yes	<input type="checkbox"/> No

****Please include objective evidence with the form. Objective evidence may be in the form of revisions to procedures, photos, personnel certification records, or other data as attachments in the email. This is to be supplemented with the Producers Corrective Actions section. The attachments should be clearly labeled to correspond with the relative TDOT deficiency number.***