



North American
TESTING

Quality Manual

201 A Plank Road
Norwalk, OH, USA 44857

Written per ISO/IEC GUIDE 65:1996 (E)

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1.0 Scope

North American Testing (NAT) is committed to a policy of providing exemplary service with respect to wastewater treatment product certification. This includes certifying new products and components, continuing product compliance and engineering evaluations of system modification as well as alternative materials for products/components previously certified by NAT.

2.0 References

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| 1. ISO/IEC Guide 65:1996 (E) | General Requirements for the Bodies Operating Product Certification Systems. |
| 2. ANSI/NSF Standard 40 (2005) | Residential Wastewater Treatment Systems (hereafter referred to as ANSI/NSF Standard 40). |
| 3. ANSI/NSF Standard 245 (2007) | Wastewater Treatment Systems - Nitrogen Reduction (hereafter referred to as ANSI/NSF Standard 245). |
| 4. ISO/IEC Standard 17020 (1998) | General criteria for the operation of various types of bodies performing inspections. |
| 5. ISO/IEC Standard 17025 (2005) | General Requirements for the competence of testing and calibration laboratories. |
| 6. Standard Methods for the Examination of Water and Wastewater (21st edition). | |
| 7. ISO Standard 19011 (2002) | Guidelines for quality and/or environmental management systems auditing. |

3.0 Definitions

The following definitions apply for the purpose of this manual.

3.1 Applicant

The Applicant is the entity requesting certification of conformity to the appropriate standards and NAT's policies and procedures.

3.2 Certification Body

The Certification Body is the party that is responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which certification is based according to ISO/IEC Guide 65.

3.3 Conformity

Fulfillment by a product, process or service of specified requirements.

3.4 Deficiency

Lack of a specified requirement.

3.5 Design Evaluation

Systematic examination of the extent to which the design fulfills specified requirements.

3.6 Exception

Limited non-compliance with applied standards and/or procedures.

3.7 Laboratory

Body that calibrates and/or performs tests.

3.8 Non-Conformity

The absence of one or more specified requirements.

3.9 Manufacturer

The distributor, supplier or other party providing the product who is responsible for assuring conformity with all requirements, particular standards or specifications and who desires to participate in the certification program and have its product(s) certified, and

1. Has qualified and trained staff capable of handling the administrative capabilities required to provide the product; and
2. Has facilities and instrumentation adequate and appropriate for providing the product.

3.10 Qualified Personnel

Personnel that have demonstrated the capability of fulfilling specified requirements.

3.11 Quality Manual

A document stating the quality policy, quality system and quality practices of an organization.

3.12 Quality Assurance Officer

The Quality Assurance Officer assesses NAT's compliance with its policies and procedures and reports to the NAT Program Manager.

3.13 Quality System

The quality system is the organizational structure, responsibilities, procedures, processes and resources for implementing quality management.

3.14 Sponsor

An organization under whose authority a certification program is developed, promulgated and financed, and with whose name the certification program is identified, and

1. Is an independent third-party organization;
2. Has a structure, and fiscal and operational controls that enable it to be impartial and completely free from control or influence by producers or buyers of the products being certified, and by other persons having a commercial interest in the products;
3. Is fiscally responsible and capable of maintaining its financial viability through the loss of a given program or client, and of financing the legal defense of its certification mark;
4. Has sufficient and qualified staffing to provide the service, inspection activities and results;

5. Has full comprehension of all technical and administrative aspects of the program and has the trust and respect of producers and producers' suppliers; and
6. Owns and controls a certification mark (symbol or sign) that is registered as a certification mark with the U.S. Patent Office under the Trade Mark Act of 1946.

3.15 Supplier

A company that provides products to the general public.

3.16 Test

A test is a technical operation that consists of the determination of one or more characteristic or performance of a given product, material, equipment, organism, physical phenomenon, process or service according to a specified procedure.

3.17 Verification

Verification is confirmation by examination and provision of evidence that specified requirements have been met.

4.0 Certification Body

NAT is a certifying body which performs evaluations for new certifications and for continuing compliance of existing certifications.

NAT is located at 201 A Plank Road, Norwalk, OH 44857.

4.1 General Provisions

4.1.1 Non-Discrimination Policy

NAT does not discriminate against applicants in any way other than what is outlined in ISO/IEC Guide 65 to ensure high quality results in certification. All applicants that meet the criteria outlined in this Quality Manual are eligible for certification. The success of NAT depends on the fair and equitable treatment of all applicants.

4.1.2 Accessibility Policy

NAT's services are available to all applicants whose activities fall within the residential wastewater treatment system industry. There are no undue financial conditions and access is not conditional upon the size of the applicant or membership of any association or group, nor is certification conditional upon the number of certificates already issued.

4.1.3 Criteria

Specific Standards outline the criteria used in certifying products, components and devices. NAT certifies products to NSF/ANSI Standards 40-2005 and 245-2007.

4.1.4 Scope

NAT confines its requirements, evaluation and decision on certification to the scope defined in appropriate ANSI/NSF Standards, specifically NSF/ANSI Standards 40-2005 and 245-2007.

4.2 Organization

NAT intends to operate as a certification body that will make all final decisions on certification.

The services of NAT are product testing, system design evaluation and evaluation of components and devices used in water and wastewater treatment systems. In general, these services will provide design evaluation and test reports that NAT will use in making their final decision regarding certification of an applicant.

4.2.a Impartiality

NAT is an independent entity focusing on product certification services to the manufacturer of a product through a defined contract.

NAT may, from time to time, lease space to manufacturers for Research & Development purposes. These R&D functions are separate from certification functions through various safeguards including computer passwords, locked filing cabinets, limited access to testing areas and observation by NAT employees of non-NAT personnel while on the NAT grounds performing R&D work. If a NAT employee is involved in the R&D of a particular product, they shall not be involved in the certification of that specific product. Specifically:

1. The Program Manager shall not be involved in the R&D of any product at any time.
2. If the Field Technical Manager assists any manufacturer with the R&D of a product, the Program Manager shall be responsible for the inspection, evaluation and sampling of that particular product.
3. If the Lab General Manager assists any manufacturer with the R&D of a product, the testing of that particular product shall be performed by an outside lab. The outside lab shall be a certified lab determined by the Program Manager to be competent to perform the necessary testing.

4.2.b Responsibility

NAT is solely responsible for its decisions to grant, maintain, extend, suspend or withdraw certificates. See QSP4.6.1, Sections 1, 10 and 11.

4.2.c Identification of Management

The following activities have a person, group or committee responsible for them:

1. The NAT Lab General Manager is responsible for technical performance of all testing as defined in ISO/IEC Standard 17025. The NAT Program Manager is responsible for quality management of testing, inspection and evaluation and shall use published standards as the technical basis for all evaluation reports, test reports, and for granting certification. The Certification Committee has the final decision on certification issues.
2. The Policy Development Committee formulates new policies and policy revisions relating to the operation of the Certification Body.
3. The Certification Committee has the final decision on certification issues. The Board of Directors authorizes the Program Manager to sign certification documents upon approval of certification by the Certification Committee.
4. The Program Manager supervises the implementation of policies.
5. The Board of Directors supervises the finances of NAT.
6. The Board of Directors delegates authority to committees or individuals as required to undertake activities on behalf of NAT.
7. Certain qualified members of the Board of Directors and the Certification Committee provide technical basis for granting certification.

4.2.d Documented Legal Identity

NAT is a legal entity registered as a Limited Liability Company to do business in the State of Ohio.

4.2.e Structural Impartiality

Overall structural impartiality is insured through the NAT Quality Manual and the Certification Committee that issues the final approval of test reports and evaluation reports. See QF4.2.2.

The Policy Development Committee is responsible for formulation of policy matters and is represented by all concerned parties.

4.2.f Separation of Powers

The NAT Quality System assures that a person different from the one who performed an evaluation, inspection or test reviews each decision on evaluations, inspections and tests.

1. Evaluations and tests are conducted by the Laboratory Technician. These evaluations and/or tests are reviewed by the Lab General Manager.
2. Inspections are conducted by the Certification Compliance and Field Auditor and reviewed by the Program Manager.
3. The Certification Committee has the final decision on all certification issues.
4. The Program Manager transfers all information to the Certification Committee.
5. If an employee assists a client in the R&D of a product to be certified, that employee shall not participate in the certification process.

4.2.g Rights and Responsibilities Relevant to Activities

The right to perform design evaluations and/or tests is granted by the applicant. NAT will also accept the right granted by other certification bodies to perform design evaluations and/or tests. The responsibility of NAT is to produce unbiased and accurate design evaluations, test reports and certifications according to the applicable standards, procedures and instructions defined in this manual.

4.2.h Liability Coverage

NAT is a privately owned facility that carries liability insurance.

4.2.i Financial Resources

The individual applicants' fees fund NAT. This facility has been in existence since the year 2006 and intends to support the certification activities with funds from certification applicants and research and development. These funds will be adequate for covering all required activities to meet the procedures defined in the NAT Quality Manual.

4.2.j Personnel Resources

The Program Manager ensures that NAT has enough qualified personnel available to test and/or evaluate services defined in this manual. The NAT training log is a record of NAT's commitment to quality. See QF4.2.5.

4.2.k Have a Quality System

This document, plus other documents described herein, defines a quality system supporting the activities required for final issuance of a certification certificate. This quality system covers all certification, inspection and testing work performed at NAT's facilities as well as all field activities.

4.2.l Certification Support Versus Other Activities

This quality system governs activities that result in certification and certification-related reports and assures objectivity of the information contained in the reports. Furthermore, the certification body acts as a third party review of objective treatment of the client.

In addition to its function as a certification body, NAT also provides research and development services. Clients involved in research and development activities are not permitted access to certification activities. Confidentiality is maintained by the use of computer passwords, locks on doors and filing cabinets, padlocked covers on equipment under test as well as observation by NAT personnel. Employees involved in the R&D operations of particular products shall not be involved in the certification of those products.

4.2.m Freedom from Commercial Pressures

NAT ensures its senior executives and staff are free from any commercial, financial and other pressures which might influence the results of the certification process. Measures that assure independence from such pressures are defined within this Quality Manual in section 5.2.2.

4.2.n Committee Operation

NAT currently has 2 standing committees.

1. The Policy Development Committee is responsible for formulation of new policies and policy revisions and is represented by all concerned parties including:
 - a. A member of the Board of Directors
 - b. A member of the Certification Committee
 - c. The Program Manager
 - d. The Lab General Manager
 - e. The Field Technical Manager
 - f. A representative from each supplier

A majority vote is required to change NAT policy regarding certification activities.

2. The Certification Committee is composed of area business people free from any commercial, financial or other pressures that might influence decisions and sign Conflict of Interest agreements stating as such.

4.2.o Assure Confidentiality, Objectivity, Impartiality

The NAT Certification Body does not:

1. Supply or design products of the type it evaluates.
2. Advise or provide consultancy services to the applicant as to methods of dealing with barriers to the certification requested.
3. Provide any other products or services which could compromise the confidentiality, objectivity or

impartiality of its evaluation processes and decisions.

4.2.p Policies for Handling Complaints, Appeals, Disputes

Quality System Procedure 7.1.1 defines methods for addressing complaints, appeals and resolving disputes.

4.3 Operations

NAT follows the requirements of ISO/IEC Guide 65 for all its certification activities.

NAT remains in compliance with the relevant standards within the scope as defined in Section 2 of this manual.

NAT follows the technical requirements of ISO/IEC Standard 17025-2005 to ensure suitability and competence for all testing activities. NAT follows Standard Methods for Examination of Water and Wastewater (21st edition) or equipment manufacturer's instructions for its laboratory test methods.

The NAT lab performs all testing functions.

Inspections of suppliers are done in conformance with ISO/IEC Standard 17020-1998.

4.4 Sub-Contracting

NAT contracts with external consultants as necessary for design reviews, testing, information technology, and:

- a. Uses policies and procedures (QSP4.4.1) to ensure that sub-contracted laborers are qualified to perform their work assignments;
- b. Requires all sub-contractors to read the quality assurance documents applicable to their work assignments;
- c. Requires all sub-contractors sign a Confidentiality Agreement (QF4.4.1);
- d. Maintains a list (QF4.4.2) of authorized and qualified sub-contractors. Sub-contractors used for testing services shall conform to ISO/IEC Standard 17025;
- e. Shall be responsible to the customer for all work performed by sub-contractors and maintains its responsibility for granting, maintaining, extending, reducing, suspending or withdrawing certification; and
- f. Shall inform the client in writing (QF4.4.3) if a sub-contractor is used for testing.

4.5 Quality System

4.5.1 Management and the Quality System

The NAT Program Manager has defined and documented a policy and objectives for quality by producing this and every other document in the QA system. The NAT Program Manager ensures that this policy is understood, implemented and maintained at all levels of the operations by demanding strict adherence to the procedures and instructions of the quality system, which are available to all personnel. Management shall notify all employees when any changes to the Quality Manual have been made. Completed test and evaluation records prove that the quality system is being followed. All employees are encouraged to report any improprieties by management to either the Certification Committee, the Board of Directors or ANSI.

4.5.2 General Quality System Issues

The NAT Program Manager has responsibility for the quality system company wide. The Program Manager also is the task leader for certification activities, and therefore has direct control over the certification activities of all employees. All authority of the Program Manager is used in accordance with this document.

The Program Manager shall ensure that all employees are made aware of the relevance and importance of their activities and how they contribute to the achievement of quality objectives. All employees shall read the Quality Manual. An acknowledgment of their strict adherence to following the procedures and instructions contained in the Quality Manual is evidenced by their signature on QF4.5.1.1. QSP4.7.2.1 defines the procedure for reporting on performance of the quality system to executive management.

4.5.3 Quality System Contents

The quality system is documented herein and contains or refers to the following:

4.5.3a Quality Policy Statement

A quality policy statement is in section 1.0 of this document.

4.5.3b Legal Status

NAT is its own legal entity registered as a Limited Liability Company to do business in the State of Ohio. Davess Holding, LLC is the sole owner of NAT.

4.5.3c Senior Executive Personnel and Staff

The Program Manager is the Senior Executive and reports to the Board of Directors. He/she is a key member of the personnel review team and, as such, has significant influence in hiring, firing and disciplinary actions. He/she also has authority to direct the activities of team members on a day-to-day basis. For more information on job qualification, experience and company organization, refer to QF4.2.2 and QF4.2.5.

4.5.3d Organizational Charts

QF4.2.2 is the company organizational chart.

4.5.3e Organization Description

Section 4.2.c describes the Certification Body. NAT makes its services accessible to all applicants whose activities fall within its declared field of operation. Access is not conditional upon the size of the supplier or membership in any association or group, nor is certification conditional upon the number of certificates already issued. There are no undue financial conditions; specifically, fees are invoiced on a monthly basis as services are performed. The scope of NAT’s services with respect to water and wastewater treatment unit certification includes certification of new products, verification of continuing compliance of certified units, engineering evaluations of scale-ups, alternate materials and modifications regarding certified units.

4.5.3f Management Reviews

The procedure for Management Reviews is QSP4.7.2.1.

4.5.3g Administrative Procedures

NAT has administrative procedures for a variety of activities, including document control as detailed in QSP4.8.2.1.

1. The Program Manager will convey all Quality System, document, or standard changes to NAT personnel via an interoffice memo.

2. The Program Manager assures continued competency of NAT personnel by observing their work. Once each quarter, the Program Manager observes all certification activities to ensure continued competency of each employee. QF4.5.3.2 is utilized for this process.
3. Once each year, the Program Manager will witness a supplier site inspection to ensure continued competency of the Certification Compliance Field Auditor.

4.5.3h Responsibilities and Duties of Personnel

All NAT test personnel are trained as “apprentices” under qualified NAT veterans and approved for their jobs by the NAT Program Manager.

Product Certification personnel are approved for work on projects according to the NAT Program Manager’s judgment of their qualifications and experience in the residential wastewater treatment system industry. Specific personnel duties can be found in the Job Descriptions, QF4.5.3.3.

See section 5.0 for more details.

4.5.3i Recruitment, Selection, and Training Procedures

Personnel employed by the company shall have qualifications for their positions. Such qualifications shall be consistent with the duties of the positions as described in the Job Descriptions. Information on the qualifications and subsequent training of all personnel shall be kept in personnel files. See Section 5.0 for more details.

4.5.3j Sub-Contractors

NAT may use sub-contractors for testing and evaluating design of products. The qualifications and required expertise for these sub-contractors are defined in QSP4.4.1.

4.5.3k Handling Non-Conformities and Corrective Actions

The NAT Program Manager addresses any general quality system non-conformities as well as potential causes of non-conformance and needed improvements. The Program Manager will perform a root cause analysis for all quality system non-conformities. The NAT Program Manager judges whether the quality system needs to be altered to address the specific non-conformity or whether the non-conformity can be handled individually. NAT monitors the results of all corrective and preventive actions to ensure they are effective. Where appropriate, NAT will perform additional audits to ensure compliance with the quality system. See QSP4.5.3.3.

4.5.3l Evaluating Products

NAT has procedures (QSP4.6.1 and QSP10.1) for evaluating products and implementing the process of certification. These procedures include the following:

1. The product must meet all the requirements noted by the specific standards regarding conditions of issue of certification documents. Retention of a product certification is maintained by passing an annual on-site continuing compliance audit and verification that there have been no changes.
2. The signature of the Program Manager controls the use and application of certification documents.
3. Conditions for granting, maintaining, extending, suspending and withdrawing certification can be found in QSP4.6.1.

4.5.3m Appeals, Complaints, Disputes

See QSP7.1.1.

4.5.3n Internal Audits

See QSP4.7.1.

4.6 Conditions and Procedures for Granting, Maintaining, Suspending and Withdrawing Certification

See QSP4.6.1.

4.7 Internal Audits and Management Reviews

4.7.1 Audits

Two types of audits are conducted on NAT:

1. Annual NAT Quality Assurance Internal Audits of the certification quality system. See QSP4.7.1.1.
2. Audits by accreditation bodies deemed to accept NAT test and evaluation reports.

4.7.2 Management Reviews

NAT management reviews NAT's quality system on an annual basis shortly after completion of the NAT Quality Assurance Internal Audit. NAT management follows QSP4.7.2.1 to conduct this management review. Management review ensures continuing suitability and effectiveness in satisfying the requirements of NAT's stated quality policy and objectives and its effectiveness and its adherence to ISO/IEC Guide 65, ANSI/NSF Standard 40 and 245, ISO/IEC Standard 17025, and ISO/IEC Standard 17020.

4.8 Documentation

4.8.1 Information Availability

NAT shall provide information upon request or on the company website www.northamericantesting.org on the following topics and update them a minimum of every 12 months, or as necessary.

- a. Certification Authority
- b. Certification System
- c. Evaluation Procedures
- d. Financial Support and Fees
- e. Rights and Duties of Applicants
- f. Complaints, Appeals, Disputes
- g. Management of Certified Products

4.8.2 NAT Documentation

NAT maintains three types of documents in the quality system:

1. QA documents including all quality system documents such as this manual, procedures and all associated instructions, attachments and forms. QF4.8.2.1 is the master document list. QSP4.8.2.1 is the Document Control Procedure.
2. Project documents including all documents associated with a particular certification test or design evaluation.

3. Correspondence including communication between NAT employees and clients.

All types of documents are kept in a secure file cabinet, in case of paper copy, and/or on the NAT server, in case of electronic documents. Both the file cabinet and the area on the server have restricted access.

Upon completion of a project, the electronic documents, organized in project files, are copied into an archiving area on the disk. A cyclic backup, at least every week, is carried out and the backup copies are maintained in a different building for increased data safety, e.g. to prevent damage by fire. Long-term archiving is the responsibility of the NAT Program Manager who stores test and project records in accordance with ANSI/NSF Standard policy.

NAT shall follow all legal requirements (state and federal) regarding the control of documents.

4.9 Records

4.9.1 Record System Procedure

NAT creates a project directory on the server as well as a hard copy for each client. All data, correspondence, notes and records related to the client are maintained in this directory. The Program Manager is responsible for the proper archiving and tracing of the documents pertaining to the relevant testing and design evaluation. Paper originals are archived in separate file folders for each certification application and stored in a lockable file cabinet in the Program Manager's office. See QSP4.9.1.1.

Paper records generated on-site or at the NAT test site (i.e., by filling out preprinted forms) shall be completed in ink and shall be protected from the weather as much as practical, so they will not be obliterated by rain, etc.

Records generated on-site or at NAT shall be maintained so as to protect sensitive information in accordance with procedures described in Section 4.10.

4.9.2 Retaining Records and Access to Records

All records are retained for at least 7 years after the date of receipt of the material. After this period, the materials are returned to the client or destroyed with written notice in advance thereof. See QSP4.9.1.1 for the record systems procedure.

4.10 Confidentiality

4.10.1 Arrangements

Every person working for NAT and involved in inspection, testing or evaluation activities must sign a Certificate of Confidentiality, Impartiality and Disclosure that resides in their personnel files.

4.10.2 Disclosure

Except as required in ISO/IEC Guide 65 or by law, information gained in the course of certification activities about a particular product or applicant shall not be disclosed to a third party without the written consent of the client. Where the law requires information to be disclosed to a third party, the client shall be informed of the information provided as permitted by law.

5.0 NAT Personnel

5.1 General

The NAT Program Manager establishes annual training goals and maintains a training record for personnel.

5.1.1 Assurance of Competency

NAT testing and evaluation personnel are competent for the functions they perform, including making required technical judgments, because the Program Manager deems them to be competent after they have either been apprenticed under a qualified NAT member or have acquired the necessary qualifications and experience. The Program Manager shall record the date personnel are approved for performing tests and inspections. This information shall be readily available.

5.1.2 Job Descriptions

NAT clearly documents job descriptions, duties and the minimum qualifications for each job at NAT. The job descriptions are available to NAT personnel as QF4.5.3.3.

5.2 Qualification Criteria

5.2.1 Minimum Relevant Criteria

See the previous sections 5.1, 5.1.1 and 5.1.2.

5.2.2 Compliance and Conflicts of Interest

Participants in NAT inspection, testing and evaluation activities must sign a contract (QF5.2.2.1) to commit to being free from any commercial, financial and other internal and external pressures that may adversely affect the quality of their work. While NAT program goals include objectives for the broad commercialization of residential wastewater treatment systems, employee salaries and promotion are not dependent upon the commercial or technical success of any specific commercial activity.

No single person within NAT has the authority to approve design evaluations or test reports. Multiple signatures are required for test and design evaluation reports.

5.2.3 Training and Qualifications

The following information is available in the Personnel Records for each employee:

- a. Name and address;
- b. Organization affiliation and position held;
- c. Educational qualification and professional status;
- d. Experience and training in each field of the testing and design evaluation;
- e. Date of most recent updating of records;
- f. Personnel evaluation/review; and
- g. The appropriate signed and dated personnel forms.

6.0 Changes in the Certification Requirements

The certification requirements are established through the appropriate published standards. When the requirements or interpretations of the requirements thereof change, NAT’s clients will be informed through the NAT website and in writing. The NAT Program Manager will evaluate the changes to the appropriate published standards to determine the time period for the manufacturer to meet the additional requirement. The Policy Development Committee formulates and approves policy revisions.

7.0 Appeals, Complaints and Disputes

7.1 Procedures

Appeals, complaints and disputes may be brought before the Certification Body by suppliers or other concerned parties. See QSP7.1.1.

7.2 When Receiving Complaints

The company must take appropriate subsequent action. A quality system complaint is one that raises doubt concerning NAT’s compliance with its policies or procedures or with the requirements of the NAT Quality System or otherwise concerning the quality of the laboratory’s tests and design evaluations.

The NAT Program Manager shall document all appeals, complaints and disputes and remedial actions relative to NAT’s support of certification activities. Also, the Program Manager shall take and/or initiate the actions described above and document the results of those actions. See QSP7.1.1.

8.0 Application for Certification Services

8.1 Information on the Procedure

8.1.1 Description of Procedures

The NAT Program Manager provides the interested potential client with a description of the certification services, containing a contract, a price schedule, and a Certification Guide outlining the particular standards, testing procedures and requirements. Upon completion of particular standards and any corrective actions, a certification certificate is issued. See QSP4.6.1.

8.1.2 Applicant Requirements

NAT requires that the potential client:

- a. Comply with relevant certification program provisions, as stated by the particular standard, the Certification Guide and NAT’s contractual provisions.
- b. Make necessary arrangements for the conducting of the site evaluation, which includes the continuing compliance audit, testing records, audit reports, personnel and resolution of complaints.
- c. Make claims regarding the certification only for applicable scope, making certain that the product is only used in the manner for which it is certified.
- d. Never use its product certification in misleading or unauthorized ways.
- e. Discontinue use of certification upon suspension or cancellation.
- f. Certify that products conform with specific standards.
- g. Certify that product references in media comply with the requirements of NAT. Annual site inspections will be conducted by the NAT Certification Compliance Field Auditor to ensure supplier compliance with the above requirements.

8.1.3 Certification Scope

All NAT certification services are based on the current version of appropriate published standards. The scope of each service is described in the related part of the standard and this information is available to the applicant.

8.1.4 More Information for Applicants

If requested, additional application information will be provided to the applicant to clarify any questions.

8.2 The Application

8.2.1 Official Application Form

NAT requires an official application, signed by a duly authorized representative of the client, in which:

- a. The scope of certification services is specified;
- b. The client agrees to supply any information needed for evaluation of products to be evaluated and/or tested and agrees to comply with the requirements for certification including but not limited to the requirements of the particular standard, NAT's Quality Manual, Certification Guide and all contractual requirements included in the contract.

8.2.2 What the Applicant Provides

As a minimum, the client shall provide:

- a. Corporate entity, name, address and legal status;
- b. A description of the product or component and all standards in addition to standards against which the product or component is to be evaluated.

9.0 Preparation for Evaluation

9.1 Reviewing the Application

The NAT Program Manager will review the application (See QSP9.1) prior to the evaluation to insure that:

- a. The requirements for certification are clearly defined, documented and understood.
- b. Any differences are resolved.
- c. NAT has the capability to perform the work with respect to the scope.

9.2 Activity Planning

The NAT Program Manager will prepare an evaluation plan (QSP9.1) for the evaluation activities. The NAT Program Manager will further develop a time schedule to implement the evaluation plan considering the availability of personnel and facilities. NAT shall inform the customer of any deviations from planned activities. Amendments to the application or planned activities shall be reviewed using the procedures for new or initial applications. An evaluation plan will be documented and forwarded to the client. A copy is placed in the client's file.

9.3 Assignment of Personnel

The Program Manager assigns the different activities to appropriately qualified personnel based on their qualifications and experience. The Confidentiality, Impartiality, Disclosure and Conflict of Interest Statement (QF5.2.2.1) must be signed by all NAT staff to assure impartiality. The Program Manager shall ensure that any personnel that may have been involved in product design or R&D will not be involved in the testing, evaluation or inspection of that product.

9.4 Document Deployment

To ensure that a comprehensive and correct evaluation or test is carried out, the Program Manager provides the appropriate working documents to NAT personnel involved in the evaluation and testing according to QSP10.1.

10.0 Evaluation

NAT evaluates the products of the applicant against the current standard as defined in its application against all certification criteria specified in the rules of the standard. All non-conformities noted by NAT shall be reported to the applicant and their resolution documented in the evaluation report. See QSP10.1.

11.0 Evaluation Report

NAT reporting procedures (See QSP11.1) will comply with the requirements of the specific standard and, at a minimum, ensure certain factors:

- a. Personnel appointed to evaluate the conformance of the products provide the Certification Committee with a report of findings as to the conformity with all the certification requirements;
- b. A full report on the outcome of the evaluation is promptly brought to the clients notice by the Program Manager, identifying any non-conformity that has to be discharged to comply with all the certification requirements and the extent of further evaluation or testing required. If the client can show that remedial action has been taken, if necessary, to meet all the requirements within a specified time limit, NAT repeats only the necessary parts of the initial procedure.
- c. A copy of the Evaluation Report is placed in the client's file.

12.0 Decision on Certification

12.1 Decision by Certification Body

NAT shall make decisions on certification based exclusively on the information gathered during the evaluation process and any other relevant information as determined exclusively by NAT. The NAT Certification Committee shall have the final decision on certification.

12.2 Delegating Authority

NAT shall not delegate authority for granting, maintaining, extending, suspending, or withdrawing certification.

12.3 Formal Certification Documents

NAT shall provide formal certification documents to each supplier achieving certification. These documents include, but are not limited to, a Product Evaluation Report, Certificate of Conformity and a License of Authority to Use the Certification Mark. The Board of Directors authorizes the Program Manager to sign these documents upon approval of certification by the Certification Committee.

12.4 Request for Amendment

In response to an application for amendment to the scope of a certificate already granted, the Certification Committee shall assemble and decide what, if any, evaluation procedure is appropriate in order to determine whether or not the amendment should be made and shall act accordingly.

13.0 Surveillance

13.1 Surveillance Procedure

Annual compliance audits determine the continuing compliance by the supplier with the program standards and policies. A NAT inspector will visit the facility in the presence of the supplier and conduct an audit. The inspector needs to have access to all records, product literature, on-site tanks, personnel and all other areas of the facility, except those where safety does not permit. The inspector uses inspection worksheets (QF4.6.1) to guide the process. If a supplier is found in non-compliance with the requirements given by NAT's certification program, the supplier will be given an opportunity to correct deficiencies. The auditor

may or may not choose to return for follow-up audits. See QSP4.6.1, Section 10. The supplier is required to conduct surveillance on its authorized representatives. See QSP4.6.1, Section 3.

13.2 Changes by the Supplier

When a supplier proposes a change in an approved system or requests approval of a scaled-up system within an approved series, the request must be made in writing and documentation and/or proposed drawings will be provided by the supplier showing these changes. NAT will review the requests in accordance with the appropriate standards and will evaluate the changes. The supplier shall not release the modified product using the mark until a letter from NAT approving the change is received by the supplier. See QSP4.6.1, Section 11.c.

13.3 Documentation

A copy of the Surveillance Report (QF13.1.1) shall be issued to the client and a copy placed in the client's file.

13.4 Periodic Evaluation

NAT shall periodically evaluate the marked products to confirm that they continue to conform to the standards. NAT shall implement reevaluation and retesting as required by the specific standards.

14.0 Use of Licenses, Certificates and Marks of Conformity

14.1 Control Over Ownership, Use and Display of Mark of Conformity

NAT owns and maintains control of the use of its certification Mark through the contractual agreement, policies and monitoring of Mark use. Prompt and well-defined action based on options defined in the contract and the associated policies is carried out for any misuse or unauthorized use of the Mark. Appropriate legal action will be taken for any misuse of Mark, not bound by the contract in place. In addition, NAT will obtain advice from legal counsel and notify appropriate governmental, regulatory and public bodies with regard to the misuse of the Mark. The Mark is affixed to the product by means of a data plate. See QSP4.6.1, Sections 8 and 11 and the applicable Standard.

15.0 Complaints to Suppliers

See QSP4.6.1, Section 9.

- a. Records of complaints to suppliers regarding compliance with relevant standards will be filed and retained by suppliers for review by NAT when requested.
- b. NAT will review suppliers' complaint records and ensure that the appropriate actions were taken in response to complaints.
- c. Records of actions taken by suppliers to correct any deficiencies with their products and services that would prevent meeting full requirements for certification will be filed and retained by suppliers for review by NAT when requested.
- d. NAT will review the suppliers' records of deficiencies with their products and services to ensure that the appropriate actions were taken in response to the recorded deficiencies.
- e. NAT will document its findings, and a report of these will be filed and retained for future reference.