Gulf Coast Testing, LLC

GCT GULF COAST TESTING, LLC

Certification Program Quality Manual

ANAB
ANSI *National Accreditation Board*
A C C R E D I T E D
ISO/IEC 17065
PRODUCT CERTIFICATION BODY
Accreditation ID 203

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Written per
ISO/IEC 17065:2012 (E)
ISO/IEC 17025:2017
ISO/IEC 17020:2012

June 1, 2022

	GULF COAST TESTING, LLC	DOCUMENT CODE	GCT-DOC001
		REVISION	03
	QUALITY MANUAL	EFFECTIVE DATE	06/01/2022

PREFACE

Introduction

Gulf Coast Testing, LLC is an ANSI accredited third party certification and testing company. Established in 1996, as a division of C-KA Associates, the division was spun off in 2002 to become Gulf Coast Testing, LLC. Gulf Coast Testing, LLC works with manufacturers and public health officials to ensure wastewater treatment systems protect the health of the public and the environment.

Mission – Quality Policy Statement

Gulf Coast Testing, LLC's mission is to protect the environment and the health, safety, and welfare of the public.

Gulf Coast Testing, LLC's staff is committed to continually improve the effectiveness of its quality Management System through review and training for all employees.

Core Values

At Gulf Coast Testing, LLC, we hold the following principles and values to be the most important, and we consider these values in making decisions:

Honesty   Safety of our Employees and Community

Good Science   Fairness   Quality

Ethics Policy

Ethics is a set of moral principles, a code for right and wrong, or behavior which conforms to accepted professional practices. ***All employees, at all times, shall conduct themselves in an honest and ethical manner.***

Confidentiality

Client information is confidential and will not be discussed with anyone, even those affiliated with the client not designated as a contact, without permission from the client. Confidential information includes test results, business relationships with the client, any testing that they conduct or investigate, and information about their certification activities.

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1.0 SCOPE

Gulf Coast Testing, LLC (GCT) is committed to its policy of providing high quality services with respect to residential wastewater treatment unit and component certification. This includes certifying new products, certifying previously certified products including those by other accredited organizations, changes in scope for units previously certified by GCT, continuing compliance, and environmental testing.

To ensure that GCT's policy of providing high quality service is realized, GCT has a "Quality Procedures" document and "Quality Forms" applicable to the activities of GCT as referenced by this document. These procedures and the related forms state the objectives of GCT in its commitment to providing high quality service and are readily available to GCT's employees.

2.0 NORMATIVE REFERENCES

a) NSF/ANSI Standard 40 (2020) - Residential Wastewater Treatment Systems (hereafter referred to as Standard 40)

b) NSF/ANSI Standard 245 (2020) - Wastewater Treatment Systems – Nitrogen Reduction (hereafter referred to as Standard 245)

c) NSF/ANSI Standard 46 (2021) - Evaluation of Components and Devices Used in Wastewater Treatment Systems (hereafter referred to Standard 46)

d) NSF/ANSI Standard 350 (2019) - Onsite Residential and Commercial Water Reuse Treatment Systems (hereafter referred to as Standard 350)

e) NSF/ANSI Standard 385 (2021) – Disinfection Mechanics (hereinafter referred to as Standard 385)

f) ISO/IEC 17000 (2020) - Conformity assessment -- Vocabulary and general principles

g) ISO/IEC 17020 (2012) - General criteria for the operation of various types of bodies performing inspections

h) ISO/IEC 17025 (2017) - General Requirements for the competence of testing and calibration laboratories

i) ISO/IEC 17065 (2012) - General Requirements for the Bodies Operating Product Certification Systems

j) Standard Methods for the Examination of Water and Wastewater (23rd edition)

k) ISO/IEC 17030 (2021) - General Requirements for Third-Party Marks of Conformity

l) ISO/IEC Guide 99 (2007) - International vocabulary of metrology — Basic and general concepts and associated terms (VIM)

m) ISO/IEC 31000 (2018) – Risk Management - Guidelines

3.0 TERMS AND DEFINITIONS

The relevant terms and definitions are quoted below for the purposes of this document.

1.1. Client

The Client is the entity conducting the certification of conformity to the requirements of any referenced standard and GCT's policies and procedures. The Client may be the manufacturer distributor, supplier, or other party providing the product who is responsible for assuring conformity with all requirements of any of the referenced standards or specifications, and who desires to participate in the certification program and have its product(s) certified. The Client shall have a qualified and trained staff capable of handling the administrative functions required to provide the service, the facilities and instrumentation adequate and appropriate for handling the service.

1.2. Consultancy

Consultancy refers to the personnel employed or contracted by GCT responsible for ensuring that products meet and, if applicable, continue to meet, the requirements on which certification is based according to ISO/IEC 17065. In this manual, consultancy refers to the activities of GCT and organizations related or linked to GCT.

a) Designing, manufacturing, installing, maintaining, or distributing of a certified product or a product to be certified

b) Designing, implementing, operating, or maintaining of a certified process or process to be certified

c) Designing, implementing, providing, or maintaining of a certified service or service to be certified

1.3. Evaluation

Evaluation includes all GCT's planning and preparation activities needed for product certification, including conformity to the Standards. Evaluation refers to the systematic examination of the extent to which the design fulfills specified requirements as specified in ISO/IEC 17000:2004, Clauses A.2 and A.3.

1.4. Product

The product is a result of a process. GCT reviews the processes of residential wastewater systems and components to determine if the product of the system or component conforms to the Standards.

1.5. Process

A process is a set of interrelated activities which transforms inputs into outputs.

GCT reviews the process of residential wastewater systems and components.

1.6. Service

Service is the result of the activities performed between the supplier and client. GCT reviews the activities of the supplier performed for the client to ensure compliance with the Standard.

1.7. Certification Requirements

A certification requirement is a specified requirement that is fulfilled by the Client as a condition of establishing or maintaining certification. GCT's certification requirements are listed in GCT's Quality Procedures.

1.8. Product Requirement

A product requirement is a specified requirement that is fulfilled by the Client as a condition of establishing or maintaining certification. GCT's certification requirements are the criteria established in the Standards.

1.9. Certification Scheme

A certification scheme is the organizational structure, responsibilities, procedures, processes, and resources for implementing product certification. GCT has Quality Procedures and Quality Forms as part of its certification scheme.

1.10. Scopes of Certification

The scope of certification is the identification of the products for which certification is granted, the applicable certification scheme, and the Standards used to ensure the products comply. GCT's scopes of certification are residential wastewater treatment unit and component certification. This includes certifying new products, continuing compliance, certifying previously certified products including those by other accredited organizations and changes in scope for units previously certified by GCT.

1.11. Scheme Owner

The scheme owner is the organization responsible for maintaining the certification scheme.

1.12. 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 17065. GCT is the certification body.

1.13. Impartiality

Impartiality means the certification body should be free from biases and conflicts of interest so that it can make objective decisions regarding certification. GCT's certification scheme, Quality Procedures, and Quality Forms insures its impartiality.

1.14. Standard

A Standard is a format that has been approved by a recognized standards organization. GCT uses standard developed by NSF. NSF is accredited by the American National Standards Institute (ANSI) to develop and publish American National Standards and has published numerous standards for residential wastewater and wastewater components. The standards used by GCT are listed in the Reference Section of Chapter 2 of this Quality Manual. Collectively, they are referred to as the Standards.

1.15. Supplier

A supplier can be a client, manufacturer, or an agent of the manufacturer that offers certified products to the public.

1.16. Test

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

1.17. Conformity

Conformity is the fulfillment by a product, process, or service of specified requirements. The purpose of the GCT scheme is ensuring conformity to the Standards.

1.18. Nonconformity

Non-conformity is the absence of one or more specified requirements of the Standards or of GCT's Quality Procedures.

1.19. Quality Manual

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

organization.

1.20. Deputy Program Manager

The Deputy Program Manager manages the day to day operations of the certification program and assumes the responsibility of the Program Manager if he is unavailable.

1.21. QA/QC Officer

The QA/QC officer assesses GCT's compliance with its policies and procedures and reports to the GCT Program Manager.

1.22. Qualified Personnel

Personnel that have demonstrated the capability of fulfilling specified requirements.

1.23. Model

A model is a type or version of a product submitted to GCT for evaluation.

1.24. Accreditation Body

The territorial, state, or federal agency having responsibility and accountability for environmental laboratory accreditation and which grants accreditation. GCT is an accreditation body for on-site wastewater accreditation.

1.25. Acceptance Criteria

Specified limits placed on the characteristics of an item, process, or service defined in requirement documents.

1.26. Calibration

A set of operations that establish, under specified conditions, the relationship between values of quantities indicated by a measuring instrument or measuring system, or values represented by a material measure or a reference material, and the corresponding values realized by standards.

  a) In calibration of support equipment, the values realized by the standards are established using reference standards that are traceable to the International System of Units (SI).

  b) In calibration according to methods, the values realized by standards are typically established using Reference Materials that are either purchased by GCT's laboratory with a certificate of analysis, purity, or prepared by the

laboratory using support equipment that has been calibrated or verified to meet specifications.

1.27. Chain of Custody

Record that documents the possession of the samples from the time of collection to receipt in GCT's laboratory. This record generally includes: the number and types of containers; the mode of collection; the collector; time of collection; preservation; and requested analyses.

1.28. Field of Accreditation

Those matrix, technology/method, and analyte combinations for which the accreditation body offers accreditation.

1.29. Finding

An assessment conclusion referenced to a laboratory accreditation standard and supported by objective evidence that identifies a deviation from a laboratory accreditation standard requirement.

1.30. Legal Chain of Custody Protocols

Procedures employed to record the possession of samples from the time of sampling through the retention time specified by the client or program. These procedures are performed at the special request of the client and include the use of a Chain of Custody Form that documents the collection, transport, and receipt of compliance samples by GCT. In addition, these protocols document all handling of the samples within the laboratory.

1.31. Method

A body of procedures and techniques for performing an activity (e.g., sampling, chemical analysis, quantification), systematically presented in the order in which they are to be executed.

1.32. Preservation

Any conditions under which a sample must be kept to maintain chemical and/or biological integrity prior to analysis.

1.33. Procedure

A specified way to conduct an activity or process. Procedures can be documented or not.

1.34. Quality Assurance

An integrated system of management activities involving planning, implementation, assessment, reporting, and quality improvement to ensure that a process, item, or service is of the type and quality needed and expected by the client.

1.35. Quality Control

The overall system of technical activities that measures the attributes and performance of a process, item, or service against defined standards to verify that they meet the stated requirements established by the client; operational techniques and activities that are used to fulfill requirements for quality; also the system of activities and checks used to ensure that measurement systems are maintained within prescribed limits, providing protection against "out of control" conditions and ensuring that the results are of acceptable quality.

1.36. Raw Data

The documentation generated during sampling and analysis. This documentation includes, but is not limited to, field notes, electronic data, magnetic tapes, un-tabulated sample results, QC sample results, print outs of chromatograms, instrument outputs, and handwritten records.

1.37. Sampling

Activity related to obtaining a representative sample of the object of conformity assessment, according to a procedure.

1.38. Complaint

An expression of dissatisfaction by any person or organization to a laboratory, relating to the activities or results of that laboratory, where a response is expected by the complainant.

1.39. Traceability

The ability to trace the history, application, or location of an entity by means of recorded identifications. Traceability relates calculations and data generated throughout the project back to the requirements for the quality of the project.

1.40. Verification

Confirmation by examination and objective evidence that specified requirements have been met. In connection with the management of measuring equipment, verification provides a means for checking that the deviations between values

indicated by a measuring instrument and corresponding known values of a measured quantity are consistently smaller than the maximum allowable error defined in a standard, regulation, or specification peculiar to the management of the measuring equipment.

4.0 GENERAL REQUIREMENTS

4.1 Legal and Contractual Matters

4.1.1 Legal Responsibility

Gulf Coast Testing, LLC is a legal entity registered as a Limited Liability Company to do business in the State of Louisiana as of August 9, 2002 with Articles of Organization filed with the Louisiana Secretary of State's Office. The Program Manager/Owner has responsibility for all activities of GCT.

4.1.2 Certification Agreement

4.1.2.1 Contract

a) GCT has Quality Form (QF031) called Contract for Standard Performance Evaluation which the client is required to execute as part of the certification process. The contract takes into account the responsibilities of GCT and the client and is legally enforceable.

b) Any differences between the request and the contract shall be resolved before certification activities commence. Each contract shall be acceptable both to GCT and the client.

c) The client shall be informed of any deviation from the contract.

d) If a contract is amended after work has commenced, the contract review shall be repeated, and any amendments shall be communicated to all affected personnel.

4.1.2.2 Continuing Compliance

The contract for Standard Performance Evaluation and GCT's Quality Procedures ensure the client complies with the following:

a. Fulfils the certification requirements

b. Continues to fulfil the product requirements for ongoing certification

c. Makes the necessary arrangements for the conduct of the evaluation including the conduct of the evaluation, examining documents and records, access to relevant equipment, investigation of complaints, and participation of observers

d. Makes claims regarding certification consistent with the scope of certification

e. Does not use its product certification in such a manner as to bring the certification body into disrepute and makes no misleading or unauthorized claims

f. Discontinues use of all advertising material for its certified product upon reducing scope or suspension of the certification

g. Follows GCT's Quality Procedure 007 for distributing certification documents

h. Follows GCT's procedures for distributing advertising brochures or other documents

i. Follows GCT's procedures for the Use of the Mark and on other information related to conformity

j. Keeps a record of all complaints regarding its certified products and makes those records available to the certification body and takes and documents the action taken to resolve the complaint

k. Informs GCT of any changes that may affect its ability to conform with the certification requirements, including but not limited to:

      i. The legal, commercial, organizational status or ownership

      ii. Organization and management, modifications to the product, or production method

      iii. Contact address or production sites

      iv. Major changes to the quality management system

4.1.3 Use of License, Certification, and Marks of Conformity

4.1.3.1 Use of License

GCT exercises control over the use and ownership over any licenses, certificates, marks of conformity, and any other mechanisms for product certification pursuant to GCT's Quality Procedure QP15 - Marking the Product Procedure

4.1.3.2 Misuse of Mark

Incorrect references to GCT's certification scheme or misleading use of GCT's Mark or any other document or mechanism indicating a product is certified shall be dealt with pursuant to GCT Quality Procedure 15 – Marking the Product Procedure.

4.2 Management of Impartiality

4.2.1 Impartiality

GCT is committed to impartiality. GCT's commitment to impartiality is reflected in its certification activities as evidenced through this Quality Manual, Quality Forms, and Quality Procedures.

4.2.2 Responsibility

Overall structural impartiality is insured through GCT Quality Procedures and Quality Forms regarding final approval of data, test reports and evaluation reports. Participants in GCT certification testing and design evaluation activities must sign a contract to commit to being free from any commercial, financial, and other internal and external pressures that may adversely affect the quality of their work. GCT employee salaries and promotion are not dependent upon the commercial or technical success of any specific commercial activity.

4.2.3 Risks to Impartiality

GCT identifies risks to impartiality on an ongoing basis. GCT uses its Quality Procedures and Quality Forms to control risk and insure impartiality. GCT performs an impartiality assessment annually.

4.2.4 Minimizing Risk to Impartiality

GCT manages all risks to impartiality through its Quality Procedures and Quality Forms. See Section 5.2 of this document.

4.2.5 Impartiality of Management

GCT's management is committed to impartiality. No single person within GCT has the authority to approve data, evaluations, or test reports.

4.2.6 GCT Consultants and Impartiality

GCT requires its employees and contractor to sign documents prohibiting the employee or consultant from:

a) Designing, manufacturing, installing, distributing, or maintaining a certified product.

b) Designing, implementing, providing, or maintaining a certified process

c) Designing, implementing, providing, or maintaining a certified service

d) Offering consultancy to any GCT client.

e) Offering or providing management system consultancy or internal auditing to GCT's clients where the certification scheme requires the evaluation of client's management system. This does not preclude the following:

    i. the possibility of exchange of information between the GCT and its clients

    ii. Using, installing, and maintaining certified products for the operation of the certification body

4.2.7 Other Entities

GCT has no other legal entities or relationships with other legal entities that would compromise the impartiality of its certification activities.

4.2.8 Separate Legal Entities

GCT has no separate legal entities or relationships with other separate legal entities that would compromise the impartiality of its certification activates.

4.2.9 Consultancy

GCT does not market or link its activities with an organization that provides consultancy.

4.2.10 Prohibition of Consultancy

GCT does not allow employees or contract personnel to make decisions for a product for which they have ever provided consultancy for two years after the end of the consultancy as evidenced by GCT's Confidentiality and Disclosure Agreement.

4.2.11 Response to Risks of Impartiality

GCT shall respond to all risks to impartiality pursuant to its Quality

Procedures and Quality Forms.

4.2.12 Actions of Employees and Consultants

GCT, through its Quality Procedures and Quality Forms, ensures its employees and consultants act impartial and free from any commercial, financial and/or other pressures which might influence the results of the certification process.

4.3 Liability and Financing

4.3.1 Liability from Operations

GCT is a privately-owned corporation that carries liability insurance.

4.3.2 Financial Resources

Customer's fees fund GCT. GCT has been in existence since the year 2002 and supports its certification activities with funds from certification activities, including research and development. These funds are adequate to cover all required activities to meet the certification processes and other related business expenses.

4.4 Non-Discriminatory Conditions

4.4.1 Policy

GCT's Quality Procedures and the administration of those procedures ensures GCT does not discriminate against applicants in any way other than what is outlined in ISO/IEC 17065 and ISO/IEC 17025.

4.4.2 Access to Certification

GCT makes its services accessible to all applicants whose activities fall within its scope of operation.

4.4.3 Non-Conditional Access

Access is not conditional upon the size of the client 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 monthly as services are performed. The procedures by which GCT administers engineering evaluations and annual continuing compliance audits are detailed in GCT's Quality Procedure for Evaluation Process and New and Continuing Compliance Reports.

4.4.4 Scope of Certification

GCT confines its certification activities to residential wastewater treatment and components of residential wastewater treatment.

4.5 Confidentiality

4.5.1 Confidential Information of Clients

GCT shall be responsible, through its contract, for the management of all information obtained or created during the performance of certification activities. Except for information GCT's client makes publicly available, or when agreed between GCT and its client, (such as responding to complaints), all other information is considered proprietary information and shall be regarded as confidential. GCT shall inform its client, in advance, of the information it intends to place in the public domain.

4.5.2 Legal Documents

When GCT is required by law or authorized by contractual arrangements to release confidential information, the client shall, unless prohibited by law, be notified of the information provided.

4.5.3 Additional Client Information

During its certification activities, GCT may obtain information from other sources than the client. Any information, except as noted in 4.5.1 and 4.5.2, will be treated as confidential.

4.6 Publicly Available Information

GCT shall maintain and provide information on the company website, http://www.gctla.com, and update them as necessary on the following topics.

    a) Certification Authority, Certification System, Evaluation Procedures, Quality Manual

    b) Financial Support and Fees

    c) Rights and Duties of Applicants

    d) Complaints and Appeals Procedure

4.7 Agreement with ANSI

GCT warrants that it will fully comply with its Program documents submitted to ANSI under the Program and agrees to promptly inform ANSI of any substantive changes relevant to its accreditation, including with respect to its status, operation, or Program Documents, and further including:

a) its legal, commercial, ownership or organizational status.

b) the organization, top management, and key personnel.

c) main policies.

d) resources and premises.

e) scope of accreditation; and

f) other such matters that may affect the ability of the GCT to fulfill requirements for accreditation.

5.0 STRUCTURAL REQUIREMENTS

5.1 Organization Structure and Top Management

5.1.1 Certification and Impartiality

Participants in GCT certification testing and design evaluation activities must sign a contract 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 GCT 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. GCT employees are evaluated on a yearly basis pursuant to performance-based criteria.

5.1.2 Organizational Structure

GCT maintains an organization chart and job descriptions. The organizational chart can be found in Annex A.

5.1.3 Organizational Responsibility

The GCT organization chart and job descriptions identify the authority and responsibility for each of the following:

5.1.3.1 GCT Program Manager

a) The GCT Program Manager is responsible for the GCT's management system and maintaining the integrity of the management system when changes to the management system are planned and implemented.

b) The Program Manager along with input from GCT employees, manufacturers, and other ANSI accredited third party certifiers, formulates the policies and procedures relating to the operation of the certification body.

c) The Program Manager, along with the QA/QC Manager, is responsible for personnel competence requirements.

d) The Program Manager supervises the implementation of all policies and procedures relating to new certifications.

e) The Program Manager is responsible for the supervision of the finances of the certification body.

f) The Program Manager, along with the QA/QC Manager, maintains the confidential files.

g) The Program Manager is responsible for all contractual arrangements.

h) The Program Manager is responsible for the provision of adequate resources for certification activities.

i) The Program Manager shall ensure that the personnel are aware of the relevance and importance of their activities and how they contribute to the management system.

j) The Program Manager is responsible for the decision on certification and shall use the Standards as the technical basis for all evaluation reports, test reports, and for granting certification.

k) The Program Manager is responsible for technical performance and quality management of all testing and evaluation as defined in by ISO/IEC Guide 17065, ISO/IEC 17020, ISO/IEC 17021, and ISO/IEC 17025.

l) The Program Manager is responsible for certification requirements. Certification requirements are referenced in GCT's Normative References and are developed by entities accredited by the American National Standards Institute (ANSI). NSF International has published numerous standards for residential wastewater and wastewater components.

m) The Program Manager appoints an employee or consultant to be responsible for the review and evaluation process.

n) The Program Manager shall form a Complaint Appeals Committee to manage complaints filed against Manufacturers, pursuant to GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation. The Program Manager shall appoint three qualified and impartial members to the committee.

o) The Program Manager is a required signatory for all certification reports and makes the final decision regarding certification.

p) The GCT Program Manager is responsible for responsiveness to complaints and appeals.

q) The Program Manager shall meet the appropriate requirements as specified in Annex B of this Quality Manual.

5.1.3.2 GCT Deputy Program Manager

a) The Deputy Program Manager is responsible for the day-to-day management of the certification Program.

b) The Deputy Program Manager is responsible for ensuring sample collection and pick-up are done pursuant to the testing requirements.

c) The Deputy Program Manager is responsible for recording the analyzed test data and transmitting data to the clients.

d) The Deputy Program Manager shall assume the responsibility of the Program Manager in the event he is unable to perform his duties.

e) Supervises all testing and ensures proper procedures are followed.

f) Maintains a variety of records and reports in manual and computerized format relative to lab results, calibration results, entry/exit logs, repairs, etc.

5.1.3.2 GCT QA/QC Manager

a) The Quality Assurance Manager is responsible for the review of the data and the data integrity process.

b) The QA/QC Manager shall have functions independent of the certification functions.

d) The QA/QC Manager shall serve as the focal point for QA/QC and be responsible for oversight and/or review of quality control data.

e) The QA/QC Manager shall be able to evaluate data objectively and perform assessments with outside (e.g., managerial) influence.

f) The QA/QC Manager shall have documented training and/or experience in QA/QC procedures and GCT's certification quality system.

g) The QA/QC Manager shall arrange for or conduct internal audits.

h) The QA/QC Manager shall monitor corrective actions.

i) The QA/QC Manager shall be familiar with all the applicable Standards used by GCT and their respective requirements.

j) The QA/QC Manager shall be a co-signatory on all certification reports.

5.1.3.3 GCT Engineering Manager

a) The GCT Engineering Manager shall perform engineering work regarding the operation and design of certified treatment systems.

b) The Engineering Manager shall perform analysis of the data relating to a specific Standard and making a recommendation whether the data conforms to the requirements of the Standard.

c) The Engineering Manager shall be familiar with all the applicable Standards used by GCT and their respective requirements.

d) The Engineering Manager shall meet the appropriate requirements as specified in Annex B.

5.1.4 Committees

GCT currently has no standing committees. However, in the event of a complaint, an appeals committee may be formed as per GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation.

5.2 Mechanism for Safeguarding Impartiality

5.2.1 Mechanism

GCT safeguards impartiality using its Quality Manual, Quality Procedures, particularly the Internal Audit and Management Review, and Quality Forms. GCT identifies risks to its impartiality on an ongoing basis with the Quality Procedure on Impartiality. This includes those risks that arise from our activities, from our relationships, or from the relationships of our personnel; however, such relationships do not necessarily present a certification body with a risk to impartiality. It is understood that a relationship that threatens

the impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients.

a) GCT is impartial as required by ISO/IEC 17065, ISO/IEC 17020, ISO/IEC 17021, and ISO/IEC 17025. For every service offered by GCT, there is a unique procedure for working with all the applicants and a universally applicable Confidentiality and Disclosure Agreement.

b) Employees and consultants shall disclose to GCT any commercial interest or financial interest outside of their association with GCT in connection with any manufacturers associated with GCT.

c) An employee's or consultant's failure to disclose a relationship with a client will result in immediate termination and a possible suspension of the certification of the manufacturer.

5.2.2 Documentation of Impartiality

GCT documents its impartiality by having its employees sign the following documents:

a) GCT's quality management ensures no single employee shall predominate the certification process. Every employee has a role in the certification process such that no one employee can determine whether certification is granted.

b) GCT employees have access to all the information necessary to fulfill their functions. All the data is located on the GCT server and available to employees.

5.2.3 Impartiality of Management

In the event management is not impartial in GCT's scheme, employees shall take independent action to preserve impartiality while respecting the client's right to confidentiality. Such independent may include, but is not limited to, reporting to other management, regulators, auditors, and accreditors. Additionally, directives from management in conflict with the impartiality requirements of ISO/IEC 17065 shall not be followed.

5.2.4 Interested Parties

During the internal audit, GCT shall identify and invite the comments of significantly interested parties. Interested parties may include clients, clients of clients, manufacturers, and governmental regulatory bodies.

6.0 RESOURCE REQUIREMENTS

6.1 Certification Body and Laboratory Personnel

6.1.1 General

6.1.1.1 Sufficient Personnel

GCT clearly documents job descriptions, duties, and the minimum qualifications for each job at GCT to ensure sufficient personnel are in place to cover its certification activities.

6.1.1.2 Qualified and Competent Personnel

GCT testing and evaluation personnel are competent for the functions they perform, including making required technical judgments by completing an apprenticeship under a GCT employee or prior experience. GCT's Quality Procedure 13 Recruitment and Monitoring of Personnel guides the hiring and evaluation of GCT's employees. The Program Manager leads the GCT quality organization and shall be the sole judge of an employee's competence. The Program Manager shall communicate to all personnel their duties, responsibilities, and authorities.

6.1.1.3 Confidentiality

All GCT personnel, including committee members, shall sign GCT's Confidentiality and Disclosure Agreement. Except as required in ISO/IEC 17065 and ISO/IEC 17025 or by law, information gained during certification activities about a particular product or applicant shall not be disclosed to a third party without the written consent of the applicant and client.

6.1.2 Management of Competence for GCT Certification Personnel

6.1.2.1 Training of Personnel

GCT has procedures to ensure the competencies of its personnel. The procedures require GCT to:

a) Maintain job descriptions with competence requirements for all its employees.

b) Select the most qualified employees.

c) Identify training needs and maintain a training record for

personnel in the Training Documentation Log.

d) Maintain a functional Organization Chart for authorization in the certification process and laboratory process.

e) Monitor the performance of personnel with annual reviews using the Annual Review Form

6.1.2.2 Training Records

GCT maintains the following records on all personnel involved in the certification process:

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) training log

f) personnel evaluation

g) authorizations held at GCT

h) date of the most recent updating of the employee records

6.1.3 Contract with the Personnel

GCT requires all employees and consultants involved in the certification process to sign Confidentiality and Non-Disclosure Agreements by which they commit themselves to the following:

a) To comply with all GCT's rules, especially those regarding confidentiality

b) To disclose any prior and/or present relationship with any clients or client's consultancy

c) To reveal any situation known to them to be a conflict of interest regarding the certification activities

6.2 Resources for Evaluation

6.2.1 Internal Resources

When GCT performs evaluation activities pursuant to ISO/IEC 17065, either with GCT personnel or consultants, the personnel shall meet the applicable requirements of ISO/IEC 17025 and ISO/IEC 17020 for inspection.

6.2.2 External Resources

6.2.2.1 Outsourcing

GCT only outsources evaluation activities to independent bodies that meet the applicable requirements of ISO/IEC 17025 and ISO/IEC 17020 for inspection.

6.2.2.2 Outsourcing to Non-independent bodies

GCT does not outsource to non-independent bodies.

6.2.2.3 Contract for Outsourcing

GCT shall have a legally binding contract with any independent body that provides an outsourced service.

6.2.2.4 Responsibility for Outsourcing

GCT has developed Quality Procedures to:

a) Accept responsibility for all activities outsourced.

b) Ensure the outsourced body is impartial.

c) Assess and monitor all outsourced activities.

d) Maintain a list of approved consultants.

e) Implement corrective action for breaches of contract or other issues.

f) Inform the client in advance of using a consultant, in the event the client may object.

7.0 PROCESS REQUIREMENTS

7.1 General

7.1.1 Certification Scheme

GCT certifies to the NSF/ANSI Standards referenced in Section 2.0 of this document. GCT has developed Quality Procedures, Quality Forms, and for its certification activities relating to these Standards.

7.1.2 Certification Requirements

GCT certifies pursuant to the Standards referenced in Section 2 of this document and the GCT Quality Procedures for the Standards.

7.1.3 Certification Explanations

The criteria contained in the STANDARDS require no explanation as to the certification theme.

7.2 Application

GCT requires an Application for Certification before GCT can initiate the certification process. The application is available on the website or by request from GCT. The application must be signed by a duly authorized representative of the client, in which the following information is specified:

a) Corporate entity, name, address, and legal status

b) Description of the residential wastewater treatment system or component

c) Scope of certification services

d) An agreement by the client to provide 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 Standards, GCT's Quality Manual, and all contractual requirements included in the Contract for Standard Performance Evaluation

e) An agreement the client will adhere to the policies and procedures of GCT

7.3 Application Review

7.3.1 Review of Application Information

GCT conducts a review of the application using GCT's Quality Procedures

and Quality Forms to determine:

a) The client information is sufficient to conduct the certification process

b) Any differences in understanding between the GCT and the client is resolved

c) The scope of the certification is defined

d) GCT has the means available to perform the certification

e) GCT has the competence and capability to perform the certification activity

7.3.2 Certification of Products with no prior experience

GCT has Quality Procedures and Quality Forms to identify when a client's request for certification includes a scope or product for which GCT has no prior experience. The Program Manager, after consultation with the Lab Manager, shall then decide as to whether GCT has the competence to evaluate the product.

7.3.3 Certification Justification of a Product

GCT shall maintain records of its competence and capability for all certification activities. The information shall be readily available and shall include the date on when the competence is confirmed.

7.3.4 Declining Certification of a Product

GCT reserves the right to decline to undertake a specific certification if it lacks competence or the capability for the certification activity.

7.3.5 Certification of Similar Products

GCT shall consider past certifications or certifications granted to other clients and may omit certain activities in the certification process if it does not compromise the certification process. GCT shall document these omissions pursuant to its Quality Procedures and provide justification if requested.

7.4 Evaluation

7.4.1 Evaluation Plan

GCT, pursuant to its Quality Procedures and Quality Forms, develops an evaluation plan for all certification activities.

7.4.2 Assignment of Personnel

GCT assigns personnel to each activity.

7.4.3 Documentation for Evaluation

GCT uses Quality Forms to ensure the necessary information is available for performing the evaluation tasks.

7.4.4 Evaluation Process

Pursuant to GCT's Quality Procedures, GCT shall evaluate the product in accordance with the evaluation plan to the criteria of the Standard.

7.4.5 Evaluation Results

GCT only relies on the evaluation results related to the certification prior to the application for certification and ensures the results are in accordance with certification scheme.

7.4.6 Evaluation Non-Conformities

GCT shall inform the client of all non-conformities documented by the evaluation process.

7.4.7 Evaluation Process with Non-Conformities

GCT shall allow the client to address any non-conformity and continue the evaluation process.

7.4.8 Documentation of Evaluation Process with Non-Conformities

If the client agrees to address the non-conformity, the evaluation process shall continue pursuant to GCT's Quality Procedures.

7.4.9 Documentation of Evaluation Activities Prior to Review

GCT shall document all the evaluation activities prior to the evaluation review.

7.5 Review

7.5.1 Certification Review

GCT assigns one person to review the certification information and results who was not involved in the evaluation. The evaluator makes a recommendation to the GCT Program Manager regarding certification.

7.5.2 Documentation of Review

A recommendation regarding certification based on the review shall be documented using GCT's Quality Form 054.

7.6 Certification Decision

7.6.1 Responsibility for Certification

GCT is responsible for all decisions on certification. GCT shall make decisions on certification based exclusively on the information gathered during the evaluation process and any other relevant information as determined exclusively by GTC. Should GCT discover information relevant to the certification outside of the certification process, the applicant shall have the opportunity to comment on the information.

7.6.2 Personnel Responsible for Certification

The Program Manager shall make all decisions on certification. The GCT personnel responsible for the evaluation shall not be involved in making the decision on certification.

7.6.3 Employment by GCT

The Program Manager, the 100% owner of GCT, makes all decisions on certification.

7.6.4 Organization Control

GCT is 100% owned by the Program Manager.

7.6.5 Personnel with entities under Organizational Control

GCT is not part of a larger entity.

7.6.6 Declining to grant certification

 In the event the decision by the GCT Program Manager is not to grant certification, GCT shall specifically identify the reasons for the decision. GCT shall allow the client to correct the non-conformity and continue testing pursuant to GCT's Quality Procedures.

7.7 Certification Documentation

7.7.1 GCT's Certification Documents

GCT shall provide the client with a GCT's Certification Certificate with the

following information:

    a) GCT's name and address

    b) The date the certification was granted

    c) The name and address of the client

    d) The scope of the certification

    e) The expiration of the certification

    f) Any other information required by the certification process, including laboratory data

7.7.2 Signing of Certification Documents

The certification certificate shall be signed by the GCT Program Manager and the Quality Assurance Officer

7.7.3 Timing of Release of Certification Documentation

GCT will only issue certification documents after the following:

    a) The decision to grant or extend the scope of certification has been made

    b) The certification requirements have been fulfilled

    c) The certification certificate has been signed

7.8 Directory of Certified Products

Pursuant to the Standards, GCT maintains all the information for its certified products on GCT website. GCT shall provide any information regarding the validity of a certification by request, but provides the following information on its website:

  a) Identification of the Product

  b) The standard to which the product has been certified

  c) Identification of the client

7.9 Surveillance

7.9.1 Annual Compliance Audits

GCT's scope of certification includes annual compliance audits. The audits determine the continuing compliance by the Client with the certification scheme and GCT's standards and policies.

7.9.2 Evaluation, Review, and Certification

GCT does not evaluate, review, or certify during annual compliance audits.

7.9.3 Compliance Audits and Certification

Annual compliance audits determine the continuing compliance by the Client with the program standards and policies. A GCT inspector conducts the audit pursuant to GCT's Program and Policies Manual using the Manufacturer's Audit Checklist. The Client shall make available to the GCT inspector 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 to guide the process including the In-Plant Audit Form, the Equipment Evaluation Form, Authorized Representative Inspection Report, Site Visit Inspection Report, and the Narrative Page. If a Supplier is found in non-compliance with the requirements given by GCT's ANSI Certification Program, the GCT inspector will note the non-compliance on the Corrective Action form and the Supplier will be given an opportunity to correct deficiencies. The auditor may or may not choose to return for a second audit. More information regarding annual compliance audits can be found in GCT's procedure for New and Continuing Compliance Reports.

7.9.4 Annual Compliance Audits for Process or Service

GCT does not certify processes or services.

7.10. Changes Affecting Certification

7.10.1 Changes in Standards

When Standards change, GCT shall immediately inform the client of the change. The client must implement the changes in the Standard in time determined by GCT's Quality Procedures. Gulf Coast Testing will review the implemented changes and will evaluate the changes as per GCT's Evaluation Procedure.

7.10.2 Changes by Client

Changes initiated by the client shall be evaluated pursuant to GCT's Quality Procedures.

7.10.3 Implementation of Changes affecting certification

GCT shall perform the following actions for all changes in the certification Standard or changes requested by the client:

a)   Evaluation

b)   Review

c)   Decision

d)   Issuance of Certification Documentation

e)   Performance of Annual Compliance Audits

These actions shall be completed in accordance with the applicable parts of Sections 7.4, 7.5, 7.6, 7.7, and 7.8 of the Quality Manual. GCT will document any decisions for excluding the above activities when a certification that is not a product requirement changes, and no evaluation, review, or decision activities are necessary.

7.11 Termination, reduction, suspension, or withdrawal of certification

7.11.1 Action on Substantiated Nonconformance

When GCT identifies a non-conformance with certification requirements through surveillance or otherwise, GCT has procedures to re-evaluate certification.

7.11.2 Action on Nonconformance with Evaluation, Review, or Certification Decision

GCT's has procedures for termination, reducing scope, or withdrawal which include the requirements of 7.4, 7.5, and 7.6.

7.11.3 Termination, Suspension or Withdrawal of Certification

GCT does not suspend certification. If certification is terminated or withdrawn, GCT will issue a Revocation of Certified Mark® to the client pursuant to its procedures. If certification is reduced, GCT has procedures to ensure the reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information.

7.11.4 Suspension of Certification

If Printed May Be Out of Date

GCT does not suspend certification. GCT only terminates the certification pursuant to its procedures.

7.11.5 Resolution of Suspension of Certification

GCT does not suspend certification. GCT only terminates the certification pursuant to its procedures.

7.11.6 Reinstatement of Suspended Certification

GCT does not suspend certification. GCT only terminates the certification pursuant to its procedures.

7.12 Records

7.12.1 Records Retention Policy

GCT's records policy is outlined in GCT's Document Control and Retention Procedure and supports its certification scheme and the requirements of ISO/IEC 17065 and ISO/IEC 17025.

GCT maintains three types of documents in its quality system:

a) QA Documents include all quality system documents such as this manual, the Quality Procedures Manual with all the associated instructions and forms.

b) Project Documents include all documents associated with a particular certification test or design evaluation and the associated laboratory documents.

c) Correspondence includes communication between GCT members and clients.

7.12.2 Confidentiality of Records

Pursuant to its records policy, GCT keeps some records confidential.

a) For electronic records, confidential records are stored on the cloud and only authorized GCT employees have access to the records.

b) For paper records, the confidential records are stored in locked file cabinets in a locked office and only authorized GCT personnel have access to the records.

7.12.3 Re-evaluation of Certification Records

GCT keeps all records for re-evaluation for the required re-evaluation pursuant to the Standard or a minimum of seven years. Upon completion of a project, the electronic documents, organized in project files, are copied into an archiving area on the disk. A cyclic backup is conducted as necessary, and the backup copies are maintained on a cloud server. Long-term archiving is the responsibility of the GCT Program Manager who stores test and project records in accordance with the Standards. Additionally, GCT shall follow all legal requirements (state and federal) regarding the control of documents.

7.12.4 Correcting Mistakes in Records

Mistakes in records are corrected pursuant to GCT's Document Control and Retention Procedure.

7.13 Complaints and Appeals

7.13.1 Complaint and Appeals Process

GCT has a complaint and appeal process available to all clients to fairly and equitable handle disputes.

7.13.2 Complaints and Appeals Applicability

GCT, upon receiving a complaint, shall confirm if the complaint is within GCT's scope of certification. Upon determination the complaint relates to those activities, GCT shall address the complaint pursuant to GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation.

7.13.3 Formal and Informal Complaints and Appeals

GCT recognizes two types of complaints, formal and informal. A formal complaint is submitted in writing or using the complaint form on the GCT website. Informal complaints are complaints received verbally. GCT will document and investigate all complaints, formal and informal. Informal complaints are investigated as deemed appropriate by GCT personnel. Formal complaints and appeals are acknowledged in writing and managed pursuant to GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation.

7.13.4. Information for Complaints and Appeals

GCT shall be responsible for gathering and verifying all necessary and available information to process the complaint or appeal to a decision.

7.13.5. Decisions on Complaints and Appeals

The decision resolving the complaint or appeal shall be reviewed and approved by the GCT Program Manager.

7.13.6. Conflicts of Interest

Except for the GCT Program Manager and Quality Assurance Officer, GCT personnel who have provided consultancy to a client or been employed by the client shall not be used by the GCT to investigate or review a complaint or appeal for two years following the end of the consultancy or employment.

7.13.7. Notification for Outcome of Complaints

GCT acknowledges the outcome of all formal complaints pursuant to GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation.

7.13.8. Notification of Outcome of Appeals

In the event of an appeal, the GCT Program Manager shall follow the procedures in GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation. GCT shall respond to both the complainant and appellant in writing with the results of the appeal.

7.13.9. Resolution

Upon resolution of the complaint or appeal, GCT shall perform all action necessary to resolve the complaint or appeal pursuant to GCT's Quality Procedure for Complaints, Disputes, and Appeals Documentation.

8. MANAGEMENT SYSTEM REQUIREMENTS

8.1 Options

8.1.1 "Option A" CB

Pursuant to ISO/IEC 17065, GCT is an "Option A" Certification Body. GCT's written Quality Procedures, and Quality Forms are consistent with fulfillment of the requirements of ISO/IEC 17065 and ISO/IEC 17025.

8.1.2 Management System Information

GCT's management system addresses the following:

a) General Management System Documentation

b) Control of Documents

c) Control of Records

d) Management Review

e) Internal Audit

f) Corrective Actions

g) Preventive Actions

8.1.3 "Option B" CB

GCT has not established a management system in accordance with requirements of ISO 9001.

8.2 General Management System Documentation

8.2.1 Policies and Objectives

It is the policy of GCT to achieve and maintain the highest standard of quality in all aspects of its work. The purpose of the GCT quality system is to:

a) Ensure the requirements of ISO 17065 and ISO 17025 are met daily for all certification activities for which GCT accreditation is held.

b) Ensure the needs of clients, the regulatory authorities and any other organizations that provide recognition are fully understood and met.

GCT has written Quality Procedures and Quality Forms that establish, document, and maintain policies and objectives of the ISO/IEC 17065, ISO/IEC 17025 and GCT's certification scheme. The GCT Program Manager ensures that the management system is understood, implemented, and maintained at all levels of the operations. The documents are available to all personnel on the website. The Program Manager shall update the website when any changes to the Quality Manual have been made.

The objectives of the quality management system are to:

a) Ensure the continued development, implementation, and maintenance of the quality system and to continually seek improvements in the effectiveness of the quality system.

b) Report results accurately and unambiguously in a timely manner; to seek improvements in the service provided to clients; to continually review the determinations offered to all clients to continue to meet the needs of the testing and certification industry.

c) Meet client requirements in terms of turn-around time, sample collection, reliability of service, and reporting.

d) Ensure tests are performed by suitably trained and qualified staff and provide opportunities for staff to extend their knowledge and competency and gain relevant professional qualifications.

e) To challenge the business to seek improvements in the equipment, its capability and methodology used.

f) Use internal audits, external proficiency, and other checks to ensure the quality system continues to comply with requirements; to ensure problems are investigated promptly, the root cause established, and effective action taken to prevent a recurrence.

g) Seek to improve communication (internal and with clients) to ensure information is made available as rapidly and as accurately as possible to those who need it, while ensuring confidentiality of the client is maintained.

h) Monitor subcontractors and suppliers to ensure quality standards are maintained in line with GCT expectations.

i) Ensure the system is maintained when changes to the management system are planned and implemented

8.2.2 Commitment to Management System

The GCT Program Manager evidences his commitment to the development and implementation of the management system by demanding strict adherence to the procedures and instructions of the system. The GCT Program Manager further evidences his commitment to a quality management system by periodically reviewing and revising the Quality Manual, Quality Procedures, and Quality Forms to meet the objectives of ISO/IEC 17065 and ISO/IEC 17025. GCT shall strive to continually improve the effectiveness of its management system using the Quality Policy, Quality Procedures, Internal Audits, Management Reviews, Corrective Actions, and Preventive Actions. The GCT Program Manager shall communicate to the entire organization the importance of meeting client requirements as well as statutory and regulatory requirements.

8.2.3 Responsibility to Maintain Management System

The GCT Program Manager has the responsibility to:

a) Ensure that processes and procedures for the management system are established, implemented, and maintained.

b) Continually evaluate the performance of the management system and any need for improvement.

c) Ensures the integrity of the management system is maintained when changes to the management system are planned and implemented.

d) Communication

8.2.4 Documentation of Management System

GCT's Quality Procedures and Quality Forms are related to the fulfillment of the requirements of ISO/IEC 17065 and ISO/IEC 17025.

8.2.5. Access to Documents

All GCT employees have access to the documents of the quality management system located on GCT's server.

8.3 Control of Documents

8.3.1 Records Retention Procedure

GCT has a Document Control and Retention Procedure for the control of documents and related information for the fulfillment of ISO/IEC 17065 and ISO/IEC 17025.

8.3.2 Records and Documents Policy

The Document Control and Retention Procedure defines controls needed to:

a) Approve documents for adequacy prior to issue; and

b) Review and update documents as necessary and re-approve documents; and

c) Ensure that changes and the current revision status of documents are identified; and

d) Ensure that relevant versions of applicable documents are available at points of use; and

e) Ensure that documents remain legible and readily identifiable; and

f) Ensure that documents of external origin are identified, and their distribution controlled; and

g) Prevent the unintended use of obsolete documents, and to apply suitable identification to them if they are retained for any purpose.

8.4 Control of Records

8.4.1 Records and Documents Control Policy

GCT has a Document Control and Retention Procedure for the control of documents and related information for the fulfillment of ISO/IEC 17065, and ISO/IEC 17025.

8.4.2 Records and Documents Retention Policy

The Document Control and Retention Procedure controls the retention and disposition of all documents with contractual and legal obligations and ensures confidentiality of the documents.

8.5 Management Review

8.5.1 General

8.5.1.1 Management Review

GCT has a management review procedure to review its management system on annual intervals or as necessary to ensure the continuing suitability, adequacy, and effectiveness, including stated policies and objectives related to the fulfillment of ISO/IEC 17065 and ISO/IEC 17025.

8.5.1.2 Annual Reviews

GCT conducts, at a minimum, annual reviews. All records from the annual reviews are maintained pursuant to GCT's Document Control and Retention Procedure.

8.5.2 Review of Inputs to Management Review

GCT incorporates the following information into the Management Review pursuant to GCT's Management Review Procedure:

a) Results of Internal and External Audits

b) Feedback from clients and interested parties

c) Feedback from Impartiality Procedure

d) Status of Preventive and Corrective Actions

e) Follow-Up actions from previous management reviews

f) Fulfilment of Objectives

g) Changes affecting the management system

h) Appeals and complaints

8.5.3 Review Outputs

GCT uses the information from the management reviews for the following actions and decisions:

a) Improvement of the effectiveness of the management system and its processes

b) Improvement of the certification body related to the fulfillment of ISO/IEC 17065

c) Identifying present and future resource needs

8.6. Internal Audits

8.6.1 Internal Audit Procedure

GCT's management system is effectively implemented and maintained using GCT's Internal Quality Assurance Audit Procedure that fulfills the requirements of its management system, ISO/IEC 17065, and ISO/IEC 17025.

8.6.2 Audit Assurance Procedure

The GCT Internal Quality Assurance Audit Procedure takes into consideration the importance of the GCT's certification processes, areas to be audited, and the results of previous audits.

8.6.3 Audit Frequency

GCT performs an internal audit on an annual basis.

8.6.4 Audit Requirements and Outcomes

The GCT Internal Quality Assurance Audit Procedure ensures:

a) Personnel conducting the audit are knowledgeable in certification, auditing, and the requirements of ISO/IEC 17065 and ISO/IEC 170025

b) Auditors do not audit their own work.

c) All GCT personnel are notified of the results of the audit.

d) Any actions taken from the internal audits are implemented timely and in an appropriate manner.

e) Any opportunities for improvement are identified

8.7 Corrective Actions

8.7.1 Corrective Actions

GCT has a Corrective Action Procedure for the identification and management of nonconformities in its certification operations.

8.7.2 Nonconformities

GCT takes actions to eliminate the causes of nonconformities to prevent recurrence. The QA/QC Manager shall determine the root cause of the nonconformity. Root cause analysis is a process by which GCT employees identify the true cause of a nonconformance.

8.7.3 Appropriateness of Corrective Actions

GCT applies corrective actions appropriate to the impact of the problems encountered.

8.7.4 Corrective Action Procedure Requirements

GCT's procedure for corrective actions shall define the following requirements:

   a) Identifying nonconformities

   b) Determining the causes of nonconformity

   c) Correcting nonconformities

   d) Evaluating the need for actions to ensure that nonconformities do not recur

   e) Determining and implementing the actions needed in a timely manner

   f) Recording the results of the actions taken and retain the records per GCT's document and retention policy

   g) Reviewing the effectiveness of corrective actions and are appropriate to the effects of the nonconformities encountered

8.8 Preventive Actions

8.8.1 Preventive Actions

GCT has a Preventive Action Procedure for taking preventive actions to eliminate the causes of potential nonconformities in the certification program.

8.8.2 Appropriateness of Preventive Actions

GCT evaluates the appropriateness of actions to the probable impact of the potential problem and the validity of results.

8.8.3 Preventive Action Procedure Requirements

GCT's procedure for preventive actions shall define the following requirements:

   a) Identifying potential nonconformities and their causes

b) Evaluating the need for actions to prevent the occurrence of nonconformities

c) Integrating and implementing the actions needed

d) Recording the results of the actions taken

e) Reviewing the effectiveness of the preventive action taken

ANNEX A – ORGANIZATION CHART

GCT, LLC Organizational Chart

William Daniel, PE *Program Manager*	→ **Ann Herring** *QA/QC Manager*

↓

Jill Ratcliff
Deputy Program
Manager

↓

Gary Beard
Engineering Manager
Responsibilities: Certification
Recommendation
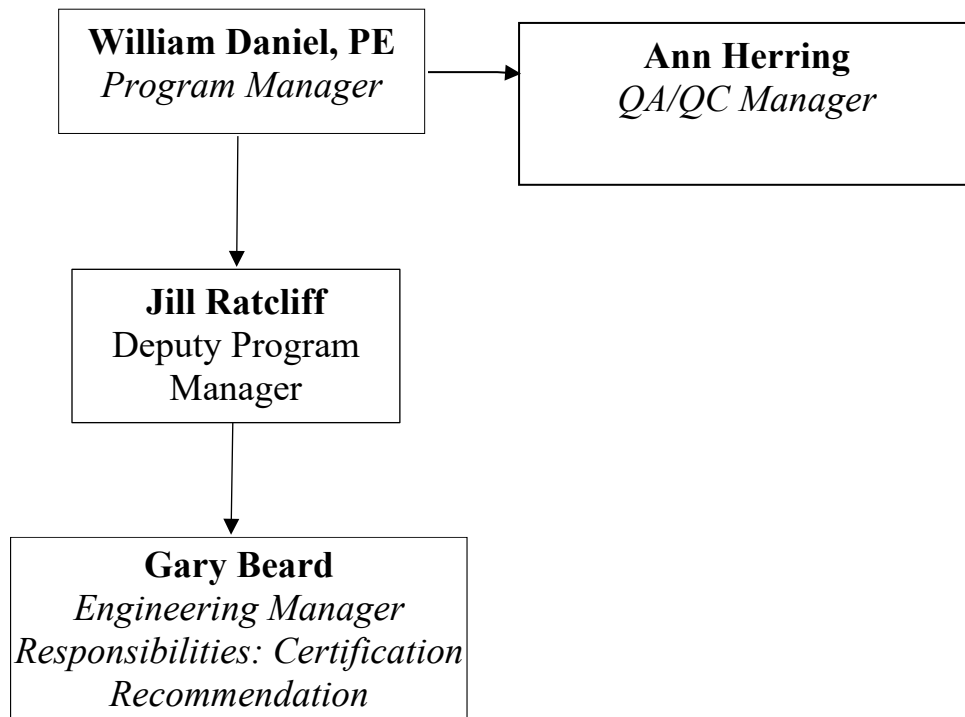
ANNEX B – JOB DESCRIPTIONS

Program Manager

Job Description:

Responsible for:

1. All aspects of GCT's Quality Management System.

2. All aspects of GCT's operations including but not limited to:
   a. Decisions on certification including new products and the approval/denial of request for engineering services such as evaluation of alternative materials, components and scale-up of certified wastewater treatment systems.
   b. Sub-contractor selection.
   c. Submittal of clients' requests to subcontractor.
   d. Supervision of the implementation of the program's policies through management reviews.
   e. Resolution of complaints.
   f. Planning and coordination of evaluations and task activities on a project basis and serving as project manager on each; responsible for client interface, budget/schedule tracking, and invoicing.
   g. Formulation of policy matters relating to the operation of the certification body including the updating of the ANSI Certification Program Manual. Responsible for monitoring for ANSI's periodic updates to the requirements for accreditation and incorporating these requirements into the Program Manual.

3. Supervision of the finances.

4. Activities of all employees.

Minimum Job Qualifications:
Engineering Degree and/or Master's Degree in Business Administration
10 years working experience, preferably in engineering with Professional Engineer Certification
10 years management experience

QA/QC Officer

Job Description:

Responsible for:

1. Implements Quality Assurance Programs

2. Maintenance of Confidential files.

3. Distribution of the ANSI Certification Program Manual.

4. Administration of the annual audits.

5. Appoint lead auditor for annual internal audit
.
6. Submit a report of the findings from the audit.

7. Verify that corrective actions are implemented.

8. Respond to audits with Program Manager

Minimum Qualifications:

Bachelor of Science in Science or Administrative Related Field
10 years working experience in Environmental Management

Engineering Manager

Job Description:

Responsible for:

1. Performing engineering work in regard to the design and operation of certified treatment systems.

2. Investigating and inspecting through site visits the quality of the operations and activities carried out by the Laboratory and Field Technical Manager to ensure compliance with approved codes of practice and standards.

3. Keeping abreast with the latest requirements of NSF/ANSI standards used by GCT.

Minimum Qualifications:

Bachelor's degree in Engineering
Professional Engineer Certification
10 years working experience in design and maintenance of wastewater treatment systems

Deputy Manager

Job Description:

Responsible for:

1. The Deputy Program Manager is responsible for the day-to-day management of the certification Program.

2. The Deputy Program Manager is responsible for ensuring sample collection and pick-up are done pursuant to the testing requirements.

3. The Deputy Program Manager is responsible for recording the analyzed test data and transmitting data to the clients.

4. The Deputy Program Manager shall assume the responsibility of the Program Manager in the event he is unable to perform his duties.

5. Supervises all testing and ensures proper procedures are followed.

6. Maintains a variety of records and reports in manual and computerized format relative to lab results, calibration results, entry/exit logs, repairs, etc.

Minimum Qualifications:

College Degree
Ten years working experience
Knowledge of Testing Standards

ANNEX C – ISO/IEC CROSS REFERENCE

GULF COAST TESTING, LLC

GCT Quality Manual Title	ISO 17065 Par.	ISO 17025 Par.	ISO 17020 Par.
1.0 Scope	**1.0**	**1.0**	**1.0**
2.0 Normative References	**2.0**	**2.0**	**2.0**
3.0 Terms and Definitions	**3.0**	**3.0**	**3.0**
3.1. Client	3.1	NA	NA
3.2. Consultancy	3.2	NA	NA
3.3. Evaluation	3.3	NA	NA
3.4. Product	3.4	NA	NA
3.5. Process	3.5	NA	NA
3.6. Service	3.6	NA	NA
3.7. Certification Requirements	3.7	NA	NA
3.8. Product Requirement	3.8	NA	NA
3.9. Certification Scheme	3.9	NA	NA
3.10. Scopes of Certification	3.10	NA	NA
3.11. Scheme Owner	3.11	NA	NA
3.12. Certification Body	3.12	NA	NA
3.13. Impartiality	3.13	3.1	NA
3.14. Standard	NA	NA	NA
3.15. Supplier	NA	NA	NA
3.16. Test	NA	NA	NA
3.17. Conformity	NA	NA	NA
3.18. Nonconformity	NA	NA	NA
3.19. Quality Manual	NA	NA	NA
3.20. Deputy Program Manager			
3.21. QA/QC Officer (Certification)	NA	NA	NA
3.22. Qualified Personnel	NA	NA	NA
3.23. Model	NA	NA	NA
3.24. Accreditation Body	NA	NA	NA
3.25. Acceptance Criteria	3.1	NA	NA
3.26. Calibration	3.7	NA	NA
3.27. Chain of Custody	3.10	NA	NA
3.28. Field of Accreditation	3.12	NA	NA
3.29. Finding	3.13	NA	NA
3.30. Legal Chain of Custody Protocols	NA	NA	NA
3.31. Method	NA	NA	NA
3.32. Preservation	NA	NA	NA
3.33. Procedure	3.1	NA	NA

ANNEX C

Nominal Cross -References to ISO 17065:2012, ISO 17025:2017, and 17020:2012

GCT Quality Manual Title	Par.	ISO 17065 Par.	ISO 17025 Par.	ISO 17020 Par.
3.34. Quality Assurance	3.5	NA	NA	NA
3.35. Quality Control	3.6	NA	NA	NA
3.36. Raw Data	3.8	NA	NA	NA
3.37. Sampling	3.12	NA	NA	NA
3.38. Complaint	3.13	3.2	NA	NA
3.39. Traceability	NA	NA	NA	NA
3.40. Verification	NA	3.8	NA	NA
4.0 General Requirements	**4.0**	**4.0**	NA	**4.0**
4.1 Legal and Contractual Matters	4.1	NA	NA	NA
4.1.1 Legal Responsibility	4.1.1	5.1, 5.5	NA	NA
4.1.2 Certification Agreement	4.1.2	7.1.4, 7.1.5, 7.1.6	NA	NA
4.1.3 Use of License, Certification, and Marks of Conformity	4.1.3	NA	NA	NA
4.2 Management of Impartiality	4.2	4.1	NA	NA
4.2.1 Impartiality	4.2.1	4.1.1	4.1.1	
4.2.2 Responsibility	4.2.2	4.1.3	4.1.2	
4.2.3 Risks to Impartiality	4.2.3	4.1.4	4.1.3	
4.2.4 Minimizing Risk to Impartiality	4.2.4	4.1.5, 5.2	4.1.4	
4.2.5 Impartiality of Management	4.2.5	4.1.2	4.1.5	
4.2.6 GCT Consultants and Impartiality	4.2.6	4.1.5	4.1.6 a)	
4.2.7 Other Entities	4.2.7	NA	4.1.6 b)	
4.2.8 Separate Legal Entities	4.2.8	NA	4.1.6 c)	
4.2.9 Consultancy	4.2.9	NA	NA	
4.2.10 Prohibition of Consultancy	4.2.10	NA	NA	
4.2.11 Response to Risks of Impartiality	4.2.11	4.1.5	NA	
4.1.12 Actions of Employees and Consultants	4.1.12	NA	NA	
4.3 Liability and Financing	4.3	NA	NA	NA
4.3.1 Ownership	4.3.1	NA	NA	NA
4.3.2 Financial Resources	4.3.2	NA	NA	NA
4.4 Non-Discriminatory Conditions	4.4	NA	NA	NA
4.4.1 Policy	4.4.1	NA	NA	NA
4.4.2 Access to Certification	4.4.2	NA	NA	NA
4.4.3 Non-Conditional Access	4.4.3	NA	NA	NA

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GCT Quality Manual		ISO 17065	ISO 17025	ISO 17020
Title	Par.	Par.	Par.	Par.
4.4.4 Scope of Certification	4.4.4	5.3	5.3	NA
4.5 Confidentiality	4.5	4.2	4.2	4.2
4.5.1 Confidential Information of Clients	4.5.1	4.2.1	4.2.1	4.2.1
4.5.2 Legal Documents	4.5.2	4.2.2	4.2.2	4.2.2
4.5.3 Additional Client Information	4.5.3	4.2.3	4.2.3	4.2.3
4.6 Publicly Available Information	4.6	NA	NA	7.5.2
4.78 Agreement with ANSI	NA	NA	NA	NA
5.0 Structural Requirements	**5.0**	NA	NA	NA
5.1 Organization Structure and Top Management	5.1	5.2, 5.7(a), 5.7(b)	NA	5.2.2
5.1.1 Certification and Impartiality	5.1.1	NA	NA	5.2.1
5.1.2 Organizational Structure	5.1.2	5.5(a)	NA	5.1.1, 5.1.2, 5.2.3, 5.2.4, 5.2.7
5.1.3 Organizational Responsibility	5.1.3	5.5(b), 5.5(c), 5.6(a), 5.6(b), 5.6(c), 5.6(d), 5.6(e), 6.2.6	NA	5.1.3, 5.1.4, 5.1.5, 5.2.5, 5.2.6
5.1.4 Committees	5.1.4	NA	NA	NA
5.2 Mechanism for Safeguarding Impartiality	5.2	NA	NA	5.2.1
5.2.1 Mechanism	5.2.1	NA	NA	5.2.1
5.2.2 Documentation of Impartiality	5.2.2	NA	NA	5.2.2
5.2.3 Impartiality of Management	5.2.3	NA	NA	NA
5.2.4 Interested Parties	5.2.4	NA	NA	NA
6.0 Resource Requirements	**6.0**	6.0	6.0	NA
6.1 Certification Body	6.1	NA	NA	NA
6.1.1 General	6.1.1	6.1, 6.2.1, 6.2.2, 6.2.4	NA	6.1.1, 6.1.2, 6.1.3, 6.1.4
6.1.2 Management of Competence for GCT Certification Personnel	6.1.2	6.2.3, 6.2.5	NA	6.1.5, 6.1.6, 6.1.7, 6.1.8, 6.1.9, 6.1.10
6.1.3 Contract with the Personnel	6.1.3	NA	NA	6.1.11, 6.1.12, 6.1.13
6.2 Resources for Evaluation	6.2	NA	NA	6.2
6.2.1 Internal Resources	6.2.1	6.2.3	NA	6.2.1, 6.2.2, 6.2.3, 6.2.4
6.2.2 External Resources	6.2.2	6.6	NA	NA
7.0 Process Requirements	**7.0**	7.0	7.0	7.0
7.1 General	7.1	NA	NA	7.1
7.1.1 Certification Scheme	7.1.1	NA	NA	7.1.1
7.1.2 Certification Requirements	7.1.2	NA	NA	7.1.2
7.1.3 Certification Explanations	7.1.3	NA	NA	7.1.3

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GCT Quality Manual Title	Par.	ISO 17065 Par.	ISO 17025 Par.	ISO 17020 Par.
7.1.4 Laboratory Capabilities	NA	NA	5.4, 7.1.1(a), (b), (c), (d), 7.1.2, 7.1.3	NA
7.2 Application	7.2	NA	NA	NA
7.3 Application Review	7.3	NA	NA	NA
7.3.1 Review of Application Information	7.3.1	NA	NA	7.1.4, 7.1.5
7.3.2 Certification of Products with no prior experience	7.3.2	NA	NA	NA
7.3.3 Certification Justification of a Product	7.3.3	NA	NA	NA
7.3.4 Declining Certification of a Product	7.3.4	NA	NA	NA
7.3.5 Certification of Similar Products	7.3.5	NA	NA	NA
7.4 Evaluation	7.4	NA	NA	NA
7.4.1 Evaluation Plan	7.4.1	NA	NA	NA
7.4.2 Assignment of Personnel	7.4.2	NA	NA	NA
7.4.3 Documentation for Evaluation	7.4.3	NA	NA	NA
7.4.4 Evaluation Process	7.4.4	NA	NA	7.1.6, 7.1.7, 7.1.9
7.4.5 Evaluation Results	7.4.5	NA	NA	7.1.8
7.4.6 Evaluation Non-Conformities	7.4.6	NA	NA	NA
7.4.7 Evaluation Process with Non-Conformities	7.4.7	NA	NA	NA
7.4.8 Documentation of Evaluation Process with Non-Conformities	7.4.8	NA	NA	NA
7.4.9 Documentation of Evaluation Activities Prior to Review	7.4.9	NA	NA	7.3.1, 7.3.2
7.5 Review	7.5	NA	NA	NA
7.5.1 Certification Review	7.5.1	NA	NA	NA
7.5.2 Documentation of Review	7.5.2	NA	NA	7.4.1, 7.4.2, 7.4.3, 7.4.4, 7.4.5
7.6 Certification Decision	7.6	NA	NA	NA
7.6.1 Responsibility for Certification	7.6.1	NA	NA	NA
7.6.2 Personnel Responsible for Certification	7.6.2	NA	NA	NA
7.6.3 Employment by GCT	7.6.3	NA	NA	NA
7.6.4 Organization Control	7.6.4	NA	NA	NA

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GCT Quality Manual Title	Par.	ISO 17065 Par.	ISO 17025 Par.	ISO 17020 Par.
7.6.5 Personnel with entities under Organizational Control	7.6.5	NA	NA	NA
7.6.6 Declining to grant certification	7.6.6	NA	NA	NA
7.7 Certification Documentation	7.7	NA	NA	NA
7.7.1 GCT's Certification Documents	7.7.1	NA	NA	NA
7.7.2 Signing of Certification Documents	7.7.2	NA	NA	NA
7.7.3 Timing of Release of Certification Documentation	7.7.3	NA	NA	NA
7.8 Directory of Certified Products	7.8	NA	NA	NA
7.9 Surveillance	7.9	NA	NA	NA
7.9.1 Annual Compliance Audits	7.9.1	NA	NA	NA
7.9.2 Evaluation, Review, and Certification	7.9.2	NA	NA	NA
7.9.3 Compliance Audits and Certification	7.9.3	NA	NA	NA
7.9.4 Annual Compliance Audits for Process or Service	7.9.4	NA	NA	NA
7.10. Changes Affecting Certification	7.10	NA	NA	NA
7.10.1 Changes in Standards	7.10.1	NA	NA	NA
7.10.2 Changes by Client	7.10.2	NA	NA	NA
7.10.3 Implementation of Changes affecting certification	7.10.3	NA	NA	NA
7.11 Termination, reduction, suspension, or withdrawal of certification	7.11	NA	NA	NA
7.11.1 Action on Nonconformance	7.11.1	NA	NA	NA
7.11.2 Action on Nonconformance with Evaluation	7.11.2	NA	NA	NA
7.11.3 Termination or Withdrawal of Certification	7.11.3	NA	NA	NA
7.11.4 Suspension of Certification	7.11.4	NA	NA	NA
7.11.5 Resolution of Suspension of Certification	7.11.5	NA	NA	NA
7.11.6 Reinstatement of Suspended Certification	7.11.6	NA	NA	NA

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7.12 Records	7.12	7.12	NA	NA
7.12.1 Records Retention Policy	7.12.1	7.12.1	NA	NA
7.12.2 Confidentiality of Records	7.12.2	7.12.2	NA	NA
7.12.3 Re-evaluation of Certification Records	7.12.3	7.12.3	NA	NA
7.12.4 Correcting Mistakes in Records	NA	NA	NA	NA
7.13 Complaints and Appeals	7.13	7.13	7.9	NA
7.13.1 Complaint and Appeals Process	7.13.1	7.13.1	7.9.1, 7.9.2	7.5.1, 7.6.1
7.13.2 Complaints and Appeals Applicability	7.13.2	7.13.2	7.9.3	7.5.3
7.13.3 Formal and Informal Complaints and Appeals	7.13.3	7.13.3	7.9.3	NA
7.13.4. Information for Complaints and Appeals	7.13.4	7.13.4	7.9.4, 7.9.5	7.6.2
7.13.5. Decisions on Complaints and Appeals	7.13.5	7.13.5	7.9.6	7.5.4
7.13.6. Conflicts of Interest	7.13.6	7.13.6	NA	7.13.4
7.13.7. Notice for Outcome of Complaints	7.13.7	7.13.7	NA	NA
7.13.8. Notification of Outcome of Appeals	7.13.8	7.13.8	7.9.7	7.5.5, 7.6.3, 7.6.5
7.13.9. Resolution	7.13.9	7.13.9	NA	NA
8.0 Management System Requirements	**8.0**	8.0	8.0	NA
8.1. Options	8.1.	8.1.	8.1.	NA
8.1.1. "Option A" CB	8.1.1.	8.1.1.	8.1.1	8.1.1
8.1.2 Management System Information	8.1.2	8.1.2	8.1.2	8.1.2
8.1.3. ISO/IEC 9001	8.1.3.	8.1.3.	8.1.3	8.1.3
8.2. General Management System Documentation	8.2.	8.2.	5.6, 8.2	NA
8.2.1. Policies and Objectives	8.2.1.	8.2.1.	5.7(a), 5.7(b), 8.2.1, 8.2.2, 8.5	8.2.1
8.2.2. Commitment to Management System	8.2.2.	8.2.2.	5.6(a), 5.6(b), 5.6(c), 5.6(d), 5.6(e), 8.2.3	8.2.2

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8.2.3. Responsibility to Maintain Management System	8.2.3.		5.6, 8.2.5, 8.5.2, 8.5.3	8.2.3
8.2.4. Documentation of Management System	8.2.4.		8.2.4	8.2.4
8.2.5 Access to Documents	8.2.5		8.2.5	8.2.5
8.3. Control of Documents	8.3.		8.3.	8.3
8.3.1. Records Retention Procedure	8.3.1.		8.3.1.	8.3.1
8.3.2. Records and Documents Policy	8.3.2.		8.3.2.	8.3.2
8.4. Control of Records	8.4.		8.4.	8.4
8.4.1. Records and Documents Control Policy	8.4.1.		8.4.1.	8.4.1
8.4.2. Records and Documents Retention Policy	8.4.2.		8.4.2.	8.4.2
8.5. Management Review	8.5.		8.9	8.5
8.5.1. General	8.5.1.		8.9.1	8.5.1
8.5.2. Review of Inputs to Management Review	8.5.2.		8.9.2	8.5.2
8.5.3. Review Outputs	8.5.3.		8.9.3	8.5.3
8.5.4 Data Integrity Investigations	NA		NA	NA
8.6. Internal Audits	8.6.		8.8	8.6
8.6.1. Internal Audit Procedure	8.6.1.		8.8.1	8.6.1
8.6.2. Audit Assurance Procedure	8.6.2.		8.8.2	8.6.2
8.6.3. Audit Frequency	8.6.3.		8.8.2	8.6.3, 8.6.4
8.6.4. Audit Requirements and Outcomes	8.6.4.		8.8.2	8.6.5
8.6.5 Notification of Clients	NA		8.8.2	8.6.5
8.7. Corrective Actions	8.7.		8.7	8.7
8.7.1. Corrective Actions	8.7.1.		8.7.1	8.7.1
8.7.2. Nonconformities	8.7.2.		8.7.1(a), 8.7.1(b), 8.7.1(c)	8.7.2
8.7.3. Appropriateness of Corrective Actions	8.7.3.		8.7.1(d), 8.7.1(e), 8.7.1(f)	8.7.3
8.7.4. Corrective Action Procedure Requirements	8.7.4.		8.7.1, 8.7.2, 8.7.3	8.7.4
8.8. Preventative Actions	8.8.		8.5	8.8
8.8.1. Preventative Actions	8.8.1.		8.5.1	8.8.1

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Title	**Par.**		**Par.**		**Par.**		**Par.**
8.8.2. Appropriateness of Preventative Actions	8.8.2.		8.5.3		8.8.2		
8.8.3. Preventative Action Procedure Requirements	8.8.3.		8.5.2		8.8.3		

NA - Not Applicable

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