



QUALITY MANUAL

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1.0 MANAGEMENT RESPONSIBILITY

1.1 QUALITY POLICY

THI vows to diligently work to deliver error-free products and services as defined by our customers. The processes and controls shall be implemented that ensure all tasks are performed to allow all products and services provided to our customers and to THI internal operations meet established requirements. Quality, continual improvement and customer satisfaction are the personal responsibility of every employee. THI will also strive to be the leader for the industry benchmarking standards.

1.2 ORGANIZATION

The President and Vice President of Tomco-Harwel Industries Inc. have the ultimate responsibility for establishing, implementing and maintaining the quality system for products and services, formulating the quality policy, defining the organization, and reviewing the quality system. The President and Vice President ensure that the quality policy is understood, implemented and maintained at all levels of Tomco-Harwel Industries Inc. through employee training.

1.3 RESPONSIBILITY AND AUTHORITY

Tomco-Harwel Industries Inc. is a flexible, evolving company that functions as a single team. Each person working at Tomco-Harwel Industries Inc. is a team member.

Everyone is responsible for all activities of his/her area, especially for ensuring that the quality system is observed and that all ideas regarding improvements are given careful consideration.

The concept of “not my job” is foreign to Tomco-Harwel Industries Inc. We each must fill a variety of positions on the team during the normal course of our day. Everyone is expected to assist other members of the team in whatever way may be needed.

Within every department of Tomco-Harwel Industries Inc., all individuals have full authority to take necessary steps to prevent the occurrence of product non-conformity. The authority includes:

1. Necessary steps to identify and record or report any product quality problems,
2. Recommend solutions,
3. Verify the implementation of solutions
4. Ensure products are not delivered to customers that fail to meet requirements without correction or appropriate customer consideration.
5. Nonconforming product must be designated as nonconforming and segregated in order to prevent accidental shipment to customer of the nonconforming product.

Tomco-Harwel Industries Inc. has an open door policy. A team member is empowered to inform the President or Vice President with any problem at any time, especially if a violation of the Quality Manual has occurred.

1.4 RESOURCES

Management is committed to providing adequate resources essential to the implementation of the quality policy, quality objectives, and the quality plan.

Tomco-Harwel Industries Inc. identifies resource requirements and provides adequate resources for management, performance of work, and verification activities as described in the Quality Procedures Manual.

Everyone is responsible for maintaining adequate resources to verify that within his/her area of responsibility all materials, services, processes and products conform to their specifications. Verification activities include inspection, testing, production monitoring and audits of systems, processes or products.

Everyone is in the "quality assurance department." Through the quality system and our individual and group efforts we must always be sure that we:

- Know what to verify
- Use the tools necessary to make the verification
- Ensure that whoever is doing the verification is properly trained

2.0 QUALITY SYSTEM

The quality system is documented and implemented to meet or exceed customer requirements. The quality system is reviewed annually by the President. Quality system documentation consists of a Quality Procedures Manual, and Process Sheets.

2.1 QUALITY PROCEDURES MANUAL

Tomco-Harwel Industries Inc. will provide a copy of Quality Procedures Manual to those customers whom request a copy of them for their internal records and/ or quality audits.

2.2 PROCESS SHEETS

Process Sheets are detailed work instructions for each product manufactured and/or packaged at Tomco-Harwel Industries Inc. Each employee is required to have a process sheet for every product being produced. A Bill of Materials is also considered a process sheet. (Reference section 9.0)

2.3 QUALITY PLANNING

Tomco-Harwel Industries Inc. quality planning addresses the specified requirements for products, projects, and contracts, as follows:

- a. The President and Vice President will oversee the preparation of a quality plan and direct activities to ensure conformance.
- b. All controls, processes, equipment (including inspection and test equipment), fixtures, resources and skills to meet the requirements will be identified by reviewing all applicable specifications as noted on the Sales Order and/or Process Sheets or Bills of Materials.
- c. Suitable verification at appropriate stages during the manufacturing of the product will be identified and noted on the Sales Order and formally updated on Process Sheet.

3.0 CONTRACT AND ORDER REVIEW

This section describes the methods and techniques used by Tomco-Harwel Industries Inc. for contract and order review and planning. It is intended to describe the processing necessary to assure that all requirements are met in the production and delivery of products that conform to contract or order requirements.

This section is applicable to all contracts and orders issued to Tomco-Harwel Industries Inc. and includes all materials to be delivered to the Customer or drop shipped per customer request.

3.1 CONTRACT AND ORDER REVIEW GENERAL

Contracts, written orders and verbal orders are reviewed to verify the customer requirements are adequately defined and well understood.

1. Each order, when received, is checked to ensure that the specifics are documented and are identical to any previous customer verbal quotation.
2. When there is a discrepancy or the order is not the same, the discrepancy is reconciled with the customer before any work is done. Revisions or changes to the contract order and process sheets are reviewed before acceptance.
3. Before production begins, every order is checked to ensure that all pertinent information is available to production and Tomco-Harwel Industries Inc. has the capacity to meet contractual or order requirements.

The President is responsible for contract and order review and amendments.

3.2 AMENDMENT TO CONTRACTS AND ORDERS

Amendments to contracts and orders are processed by the President and circulated to Vice President and personnel impacted by these changes. Any updates made to Process sheets will be documented and performed under the direction of the President.

3.3 CUSTOMER REQUIREMENTS

Since Tomco-Harwel Industries Inc. provides a manufacturing service, it is critical that we understand exactly what our customers' need for us to provide. A primary purpose of Tomco-Harwel Industries Inc. operating procedures are therefore to ensure that for every customer order we:

- Review the requirements of the order
- Make appropriate coordination with the customer
- See that all requirements are clearly defined and documented on the sales order or process sheet
- Resolve all differences between our proposal and the customer's requirements
- Ensure THI has the capability to meet the requirements
- Have a method for amending the order
- Maintain records and document the requirements through the process sheets

Train appropriate production personnel.

When product is produced per customer specifications, THI assumes no liability for the finished materials.

4.0 DESIGN CONTROL

Design functions performed at THI are limited to new products development on an individual customer basis. When a new product is developed the following procedures will be followed:

- Customer requirements for the new products are understood
- Customer is given several product samples for review
- THI documents sample information and insures that each sample is accurate to actual manufactured product
- Customer approval is required before orders are filled on new products, *THIS APPROVAL MUST BE IN WRITING*
- Costs are determined and pricing set on new products; customer must approve pricing before manufacturing begins.

We do not perform design functions on any current customer products (materials and processes) without their written instructions to do so and without the above processes being followed.

5.0 DOCUMENT AND DATA CONTROL

5.1 GENERAL

The purpose of this section is to provide a method of assuring that the authorized versions of process sheets and other documents are used to produce products by Tomco-Harwel Industries Inc. This section is applicable to all specifications used by Tomco-Harwel Industries Inc.

5.2 DOCUMENT APPROVAL AND ISSUE

Tomco-Harwel Industries Inc. will maintain the master file of all documents in a computer file, there will only be copies released when needed. The only version kept in the system is the most current, obsolete versions are deleted from the system or archived to avoid accidental usage.

The following are primary and not exclusive methods for releasing and updating documents for use:

- a. New specifications received with the customer purchase order are reviewed for changes; changes are made on customer process sheets and bills of materials and sales orders and then placed in the Customer File.
- b. Process Sheets and Sales Orders will be controlled and released to Vice President for Production by the order processor, generally, the Office Manager or President
- c. A copy of the Process Sheet is included with the Sales Order in the work packet for the production process.
- d. The copy of the Process Sheet is returned to the Customer File with the copy of the Sales Order upon completion of the Order. Customer files are kept in the office file cabinets for a minimum of seven (7) years.
- e. The Customer File is maintained in the front office.
- f. A master list of all Customers and the Process Sheets are kept in the computer system and backed up on a regular basis.

5.3 PROCESS SHEETS

A process sheet is a list of specific ingredients, production directions, corrective actions of past problems or concerns by the customer and inventory counts on each order produced.

To make a process sheet:

- 1) Determine batch size of product to be produced.
- 2) Refer to customer specifications for ingredients list, including containers, labels, boxes, and special additions to finished product. List these items under "ingredients" and "quantities" sections of the process sheet.
- 3) Determine instructions for producing based on customer specifications and work experience with the type of product. List these items under "instructions" section of the process sheet.
- 4) List any corrective actions that have occurred with the product in "special instructions" section of process sheet.

To use a process sheet OFFICE:

- 1) Enter amount in "quantity to produce" box, based on customer's order.
- 2) Print copy and insert into work packet.
- 3) Get batch numbers and produce labels (where applicable)

- 4) Insert labels into work packet

| To use a process sheet PRODUCTION:

- 1) Read process sheet thoroughly **before** beginning.
- 2) Verify that all paperwork, especially labels, is included in the work packet.
- 3) Verify that all ingredients are in stock and write lot numbers on process sheet in appropriate blanks.
- 4) Begin processing following instructions and special instructions.
- 5) When completed, sign and date bottom of process sheet and then give paperwork to Plant manager/ Dave Crow and return label spools.

DO NOT MAKE ANY ASSUMPTIONS OR DECISIONS, IF ANY PART OF THE PROCESS IS NOT UNDERSTOOD OR INCOMPLETE, EMPLOYEE MUST ASK PLANT MANAGER/DAVE CROW TO VERIFY PROCESS.

NEVER CHANGE A PROCESS WITHOUT APPROVAL FROM PRESIDENT OR VICE PRESIDENT.

5.4 OTHER DOCUMENTS

All other documents used by THI are kept in the computer system and used according to their purpose; all documents are considered confidential to THI and should be shredded after use or filed in secure and appropriate files. Files are kept for seven (7) years and then destroyed or shredded.

6.0 PURCHASING

This section is to establish a procedure for assuring that all supplies and services procured by Tomco-Harwel Industries Inc. conform to all Customer requirements. This section is applicable to all supplies and services procured for use in products produced by Tomco-Harwel Industries Inc.

6.1 EVALUATION OF SUPPLIERS AND SUBCONTRACTORS

A Qualified Supplier is any vendor listed as active in the Supplier List in the computer system. If a vendor is not listed as "active", the President or Vice President must approve the use of that supplier for any purchase.

6.2 PURCHASE ORDERS

Purchase order forms used by Tomco-Harwel Industries Inc. will be numbered for control and will contain Tomco-Harwel Industries Inc. name and address. Completed purchase orders will contain:

- a. Name of the supplier.
- b. Detailed description of the supplies or services using part numbers as set up in the inventory control system.
- c. Quality requirements when required.
- d. Type and kind of inspection, when required.
- e. Type and kind of certification, when required

Upon receipt of product Purchase orders will be attached to bills of lading or receipts from vendors. These are kept in files and stored for seven (7) years.

6.2.1 RECEIVERS

Receivers are issued when a product is received from a purchase order. A receiver is used to match the supplier invoice to the purchase order for accuracy. These are attached to the supplier invoice and kept in the files for payment. After payment is made, they are moved to the payables archives for storage for seven (7) years.

6.3 AUTHORIZED PURCHASING

Only those authorized by the President and/or Vice President can purchase products for Tomco-Harwel Industries Inc. Tomco-Harwel Industries Inc. will not be responsible for unauthorized purchases. Authorized buyers include President, Vice President. and Purchasing manager up to \$5,000.00, Office Manager up to \$250.00; there are no other authorized buyers at THI.

7.0 CONTROL OF CUSTOMER SUPPLIED PRODUCT

This section is to provide guidance for inspection and control of Customer furnished material. This section is applicable to any contract or order that specifically involves material furnished by the Customer.

7.1 PROCEDURE

7.1.1 When material is furnished by the Customer, receiving inspection will accomplish as a minimum:

- a. Examination upon receipt to detect damage in transit.
- b. Inspection for completeness and proper type.
- c. Identification and protection from improper use or disposition
- d. Verification of quantity

7.1.2 Tomco-Harwel Industries Inc. will report to the Customer any Customer-furnished material found damaged, malfunctioning, or otherwise unsuitable for use. In the event of damage or malfunction during or after blending and/or packaging the President or Vice President will determine probable cause and necessity for withholding material from use.

7.1.3 All Customer-Furnished Material will be properly stored and identified to prevent damage and unauthorized use or disposition.

7.1.4 Periodic inspection of count and condition will be made of stored material, as requested by customer.

8.0 PRODUCT IDENTIFICATION AND TRACEABILITY

During the entire processing cycle (receiving, production, storage, and shipping), procedures are maintained to ensure materials, components, and products are identified. It is critical that at all points in our process until the product is in the customer's hands we track which specification, grade, and lot that raw materials, containers, tools, documents and products represent.

Products which are labeled with lot numbers for traceability back to the manufacturer of the raw materials are maintained in THI records. All other materials are inspected upon receipt to insure they conform to proper product specification.

Any material that does not pass inspection or is incorrect, must be segregated from the manufacturing process and the supplier notified by purchasing immediately for replacement. If it is customer owned material and does not pass inspection, the customer must be notified by Tracy Crow or Sales Manager immediately to allow the customer to correct the mistake and make appropriate corrective action.

THI will not be responsible for customer owned materials that are shipped to THI incorrectly or defective. See Section 10.0 Inspection and Testing more details.

9.0 PROCESS CONTROL REQUIREMENTS

This section is to provide guidance in the preparation and control of Process Sheets used by Tomco-Harwel Industries Inc. This section is applicable to all processes and testing required by contracts or customer requirements.

9.1 PROCESS SPECIFICATION REQUIREMENTS

Tomco-Harwel Industries Inc. will monitor and control the Process Sheets.

9.2 PROCESS SHEETS

A process sheet is a list of specific ingredients, production directions, corrective actions of past problems or concerns by the customer and inventory counts on each order produced.

To make a process sheet:

- 1) Determine batch size of product to be produced.
- 2) Refer to customer specifications for ingredients list, including containers, labels, boxes, and special additions to finished product. List these items under “ingredients” and “quantities” sections of the process sheet.
- 3) Determine instructions for producing based on customer specifications and work experience with the type of product. List these items under “instructions” section of the process sheet.
- 4) List any corrective actions that have occurred with the product in “special instructions” section of process sheet.

To use a process sheet OFFICE:

- 1) Enter amount in “quantity to produce” box, based on customer’s order.
- 2) Print copy and insert into work packet.
- 3) Get batch numbers and produce labels (where applicable)
- 4) Insert labels into work packet

To use a process sheet PRODUCTION:

- 1) Read process sheet thoroughly before beginning.
- 2) Verify that all paperwork, especially labels, is included in the work packet.
- 3) Verify that all ingredients are in stock and write lot numbers on paperwork.
- 4) Begin processing following instructions and special instructions.
- 5) When completed give paperwork to Plant manager/ Dave Crow and return label spools.

DO NOT MAKE ANY ASSUMPTIONS, IF ANY PART OF THE PROCESS IS NOT UNDERSTOOD, EMPLOYEE MUST ASK PLANT MANAGER/DAVE CROW TO VERIFY PROCESS BEFORE PROCEEDING.

9.3 PREVENTIVE MAINTENANCE

All machines used in production will be maintained on a preventative basis. Maintenance will occur as suggested by equipment manuals or common accepted practices.

10.0 INSPECTION AND TESTING

This section is to provide guidance for the inspection, documentation, and control of supplies and/or services procured by Tomco-Harwel Industries Inc. for the use in products produced by Tomco-Harwel Industries Inc. for the Customer.

10.1 APPROVED INSPECTION AND TEST SOURCES

Tomco-Harwel Industries Inc. may procure inspection or test services from a qualified outside source at any time as deemed necessary or appropriate.

10.2 RECEIVING INSPECTION

10.2.1 All supplies will be inspected for shipping damage or deterioration and conformance to requirements upon receipt. The receiving inspector will indicate results if any then signing and dating the Bill of Lading.

10.2.2 All items found to be nonconforming will be placed in a controlled area and marked as nonconforming until disposition has been determined. The receiving inspector also has the right to refuse nonconforming products at time of delivery.

10.2.3 The President or Vice President will be notified when items (including certifications) are found to be non-conforming.

10.3 IN-PROCESS INSPECTION

This section is to provide guidance for the orderly accomplishment of required in-process inspections and tests. Such inspections are required to assure that all non-conformances are detected early in the manufacturing process.

10.3.1 All items require in-process inspections or visual examination as stated by the Process Sheet. Each process sheet will have specific requirements based on the product and customer requirements.

10.3.2 Items found to be non-conforming will be removed from the manufacturing process until a decision can be made on the item and corrective action taken to prevent recurrence.

10.3.3 When required by customer, Sampling Plans will be implemented by Tomco-Harwel Industries Inc. such plans will be included in the process sheet instructions.

10.4 FINAL INSPECTION

This section is to provide Guidance for the orderly accomplishment of required final inspections and tests.

10.4.1 Final inspection will be accomplished on all completed items as they are prepared for shipment or delivery. The inspector or person loading the finished product for delivery or shipment will thoroughly inspect to ensure correct product is loaded, in the exact quantity, the proper paperwork is included, labels are on securely, lids are tight and product appears in good condition. Product not meeting these requirements WILL NOT BE SHIPPED.

10.4.2 Products found to be non-conforming will be removed to a controlled area until disposition is determined. Sales will be notified immediately to inform customer of a revised shipment date due to non-conformance.

11.0 CONTROL OF INSPECTION, MEASURING AND TEST EQUIPMENT

This section is to provide a system for the control of all measurement and test equipment used by Tomco-Harwel Industries Inc. to assure product conformance are calibrated.

The accuracy of the equipment is known, and appropriate equipment is selected for the required measurements. The equipment is identified with its calibration status and records are maintained. The equipment is properly maintained and stored to preserve its accuracy and fitness for use. This section is applicable to all measurement devices used by Tomco-Harwel Industries Inc.

11.1 CONTROL PROCEDURE

11.1.1 All measurement devices will be labeled to show date calibrated, date due, and by whom certified.

11.1.2 All measurement equipment will be used, handled, stored, and transported in a manner that will not affect the calibrated condition.

11.1.3 Calibration records will be maintained on all measurement equipment and standards. Records will be kept in a file in the office. They will contain:

- a. Serial or identification number
- b. Description
- c. Date of Last Calibration
- d. Results of Last Calibration

11.1.4 Any item of measurement equipment that cannot be calibrated by Tomco-Harwel Industries Inc. will be calibrated by an outside source. Reliable calibration sources will be used and required standards, generally ASTM, will be included on the *purchase order*.

11.1.5 Certificates, reports, or data sheets supplied on all measurement equipment (including standards) calibrated by outside sources will show compliance with required standards.

11.1.6 Measuring and testing equipment and/or documentation will be made available to the Customer as required.

12.0 CONTROL OF NON-CONFORMING PRODUCT

12.1 GENERAL

This section is to provide the procedures for controlling material found to be non-conforming. Non-conforming products are controlled to prevent inadvertent usage or shipment to the customer. This section is applicable to purchased material, processed material, and completed items.

12.2 REVIEW AND DISPOSITION

Purchased material found to be non-conforming when:

- a. It shows evidence of damage or deterioration.
- b. Does not conform to specification or marking requirements contained in the purchase order.

12.2.1 Purchased material found to be non-conforming will be Labeled and placed in a secure area to prevent its use.

12.2.2 The President or Vice President will be notified and non-conforming material will be returned to vendor.

12.3 ITEMS FOUND TO BE NON-CONFORMING DURING TEST AND INSPECTION

12.3.1 Processed material and completed items are considered non-conforming when it is determined the item does not conform to the Customer requirements, as specified on the Process Sheet.

12.3.2 Non-conforming items or material will be Labeled and segregated for rework or disposal.

12.4 CUSTOMER RETURNED PRODUCTS

Products rejected by the customer are processed as follows:

1. Product is Labeled accordingly and placed in a segregated area.
2. Customer is contacted by the President or Vice President to determine why the product was returned. Results are documented in Customer file.
3. Disposition is then determined.
4. Product may be reworked or disposed pending review with customer.
5. If deemed necessary by THI President or Vice President corrective action will be made and process sheets updated to prevent reoccurrence. (See section 13.0)

13.0 CORRECTIVE AND PREVENTIVE ACTION

13.1 GENERAL

The purpose of this section is to provide an effective corrective and preventive action plan that provides for the correction of defects and to prevent their recurrence. This provision is to help eliminate work and waste.

This section is applicable to all products produced by Tomco-Harwel Industries Inc. Processes, work operations, quality records, service reports, and customer complaints are analyzed to detect and eliminate potential causes of non-conforming product. Causes are investigated and corrective action taken to prevent recurrence.

13.2 CORRECTIVE ACTION

Corrective actions are taken when product non-conformity is identified, quality problems are detected in the process, non-conformances are revealed, or customer complaints are received. The President and Vice President are responsible for follow up to determine if the corrective action has been implemented and if it is effective.

13.2.1 Identification of defects:

- a. When a product does not meet specifications stated on the Process Sheet it is determined to be defective or non-conforming.
- b. The product will be labeled.
- c. The President or Vice President will then determine disposition.

13.2.2 Investigation as to Cause:

- a. The President or Vice President will investigate the defect to determine the most probable cause.
- b. If defect cannot be determined, the customer will be consulted as to the defect and a change may be required by the customer on the Process Sheet.
- c. If the defect was caused by a purchased product, all products in stock will be examined for the defect.

13.2.3 Corrective Action of Defects:

- a. Simple defects that can be corrected without altering the item will be reworked and rework will be documented on the Process Sheet.
- b. When President or Vice President are authorized by customer or contract, and the defect does not alter form, fit, or function, item will be excepted.
- c. Significant defects are labeled and segregated to prevent shipment to the customer.

13.2.4 Correction as to Cause

- a. Corrective action to prevent recurrence will include but not be limited to:
 1. Improved procedures
 2. Training of Personnel
 3. Repair or calibration of equipment
 4. Change made to Process Sheet
- b. When Corrective action is initiated by the Customer, Tomco-Harwel Industries Inc. will respond on a timely basis, to the satisfaction of the customer.

13.3 PREVENTIVE ACTION

Preventive action focuses on the longer range and may include any of the following, according to the situation:

- a. Reviewing previous corrective actions, solution results, and risk to future operations.
- b. Analyzing all processes, work operations, concessions, quality records, and customer complaints to detect and eliminate potential causes of non-conforming products or services.
- c. Verifying that actions taken to deal with problems are at a level corresponding to the risk encountered.
- d. Recording changes on the Process Sheets resulting from the corrective actions.

14.0 HANDLING, STORAGE, PACKAGING, PRESERVATION, and DELIVERY

14.1 GENERAL

Throughout their processing, materials and finished products are handled, stored, and transported in such a way as to prevent damage, risk, and/or deterioration. Products are protected prior to and during delivery.

14.2 HANDLING

All employees are responsible for preserving the quality of received materials. Material handling requirements are detailed in this procedure. Receiving verifies the delivered material or products as follows:

- a. The material is unloaded from the truck and inspected to verify count and general specifications.
- b. The material is verified against the Bill of Lading.
- c. The material is stored at point of use in the operation to avoid further transportation and possible damage.

14.3 STORAGE

The material is normally stored at point of use in the operation to avoid further transportation and possible damage.

14.4 CONTROL OF EXCESS INVENTORY

Tomco-Harwel Industries Inc. will strictly control all inventory of the customer proprietary product that is in excess of contract quantity in order to prevent product from being sold or provided to any third party without prior written authorization from the customer.

14.5 PACKAGING

Production is responsible for packaging items for customer delivery. Standard packing will be stated on the Process sheet.

14.6 PRESERVATION

All products are protected from deterioration during receiving, production, and delivery.

14.7 DELIVERY

Tomco-Harwel Industries Inc. protects product quality during the shipping process, when delivered via Tomco-Harwel Industries Inc. owned vehicle.

When shipped via common carrier Tomco-Harwel Industries Inc. does what is deemed necessary to insure delivery of undamaged products to the customer, however, we do not take responsibility for the shipment once it has left our premise via common carrier, unless specifically stated by customer contract.

15.0 CONTROL OF QUALITY RECORDS

Quality records are maintained as objective evidence that the required quality has been achieved and the operation of the quality system is effective. Quality records are kept in the appropriate files maintained by Office Manager.

Retained samples are kept per special request by customer, normally up to 60 days.

15.1 LIST OF QUALITY RECORDS

Quality records include:

1. Customer File
 - a. Sales Order and/or Process sheets
 - b. inspection reports as required
2. Materials test reports
3. Shipping and receiving reports
4. Special tracking
5. Purchase orders

16.0 TRAINING

Training needs of all personnel are identified and required training is provided. Records of personnel qualifications and training are maintained.

President and Vice President are responsible for compiling training information about each employee regarding the employee's qualifications for performing his/her specific duties. Information includes education, training, and/or experience as it relates to the employee's job.

President and Vice President are responsible for locating appropriate training program trainers, instructors, etc., and arranging for requested training to be provided to employees. As additional employee training is completed, training records are updated accordingly.

Training records are normally maintained in the employee's personnel file or master training file by subject.