

1 Intent

This program will establish a procedure for timely notifications and communications required in a potential load contamination or off spec product, where it is believed Qualawash may have some liability.

2 Accountability

All locations will utilize this procedure. Deviation will only be permitted if a written request to deviate is made to the Qualawash Risk Management Department.

3 Procedures

The following steps will be followed to allow Qualawash timely notification of a potential contamination or load rejection due to off-spec products:

- 3.1 Transporter to notify Qualawash within 24 hours of rejection at the address indicated below in section 3.4
- 3.2 If Facility Managers is notified, immediately notify Paige Hodgkin and Beverly Burton, and provide the Transporter with the following list of required documentation:
 - 3.2.1 Written description of all specifics known regarding alleged contamination
 - 3.2.2 Qualawash service center work order
 - 3.2.3 MSDS for contaminated product
 - 3.2.4 MSDS for prior three loads hauled by trailer
 - 3.2.5 Maintenance history of trailer for the last 90 days
 - 3.2.6 History of tractor and onboard pump, including date pump last cleaned and prior three loads hauled by tractor
 - 3.2.7 MSDS for prior three loads hauled by tractor
 - 3.2.8 History of hoses used, including cleaning record and past three products in contact with hoses
 - 3.2.9 Shipper C of A and / or any available lab analysis
 - 3.2.10 Copy of Bill of Lading
 - 3.2.11 Present location of the loaded trailer and contact information to obtain necessary samples prior to disposal
 - 3.2.12 Estimated quantity and approximate cost value of the product at issue
 - 3.2.13 Copy of consignee NCR form indicating the load rejection and reason

- 3.3 Above documentation to be sent electronically or via Facsimile to:
Paige Hodgkin
Qualawash Sales Coordinator
Email: phodgin@qualawash.com
Fax: 803.324.2355
Phone: 803.324.5310
- 3.4 Qualawash Sales Coordinator will obtain all contact information for the notifying party and immediately notify the appropriate service center manager, area manager, Ops VP, sales department, and Safety/Risk Management of the incident.
- 3.5 Transporter will be contacted within 24 hours (or next business day) after receipt of notification by the appropriate Qualawash area manager to:
- 3.5.1 Acknowledge receipt of the preliminary documentation
 - 3.5.2 Provide contact information for subsequent communications
 - 3.5.3 Discuss and determine the requirements for next steps in the process, such as the requirement for samples, equipment inspections, etc.
 - 3.5.4 Discuss and determine an estimated amount of the claim
- 3.6 Qualawash will conduct internal investigation of the events and document on NCR form circumstances potentially impacting situation. Qualawash will provide transporter with this information via copy of updated NCR
- 3.7 Based on the data collected by all parties involved, Qualawash and Transporter will determine best course of action to resolve the incident.
- 3.8 Additional Information
As indicated in the opening paragraph of this document, and according to the terms outlined on the Qualawash service center work order, "Qualawash makes no guarantees with respect to the completeness of the washing process or the complete elimination of all residue and/or moisture." It is impossible to guarantee a process where there are many variables that can be introduced into the cycle either before or after the wash is complete; such as incomplete documentation detailing the specifics of the last contained product, hoses that were not requested to be cleaned at the same timer as the trailer, a tractor mounted pump not cleaned from a prior load, internal valves that are not properly seating, moisture introduced into the tank after it is cleaned and dried, etc.
- 3.9 Documentation
Form 80 - Qualawash NCR Report Form