



**FOOD SAFETY AUDIT REPORT**

**#19408-A**

Peanut Corporation of America  
14075 Magnolia St.  
Blakely, GA 39823-0448

By

**EUGENE A. HATFIELD**

Food Safety Auditor

March 27, 2008

**AIB International**

1213 Bakers Way • PO Box 3999 • Manhattan, KS 66505-3999  
(785-537-4750) • (800-633-5137) • Fax (785-537-1493)

<http://www.aibonline.org>

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## RATING

A food safety audit was conducted at this facility on March 27, 2008.

The writer was accompanied throughout the audit by Mr. Danny Kilgore, Operations Manager; and Ms. Annie Bristow, Janitorial and Sanitation Director.

Excellent cooperation was received by the writer, and on some occasions, the items were immediately corrected.

At the conclusion of the audit, a meeting was held to discuss the observations, recommendations, and rating. The meeting was held with Mr. Danny Kilgore, Operations Manager.

Based on the observations made, the information obtained, and the criteria set forth in the *AIB Consolidated Standards for Food Safety*, the overall food safety level of this facility was considered to be:

## SUPERIOR (910)

**The “serious” or “unsatisfactory” items are shaded, boxed, and bolded in the text of the report. Refer to the definitions in the AIB Consolidated Standards.**

**The “improvement needed” items are designated in bold type and require prompt attention.**

The AIB International states that the report as given herein is to be construed as its findings and recommendations as of the date of this report. The AIB International accepts no responsibility and does not assume any responsibility for the food safety program in effect with (customer). That further AIB International is only making report of the food safety conditions of (customer) as of the date of this report and assumes no responsibility or liability as to whether (customer) carries out the recommendations as contained in this report or does not carry out the recommendations as contained in this report.

## RATING ANALYSIS

DATE OF AUDIT: March 27, 2008  
TYPE OF AUDIT: Announced  
OVERALL RATING: **SUPERIOR**

ADEQUACY OF FOOD SAFETY PROGRAM	175
PEST CONTROL	195
OPERATIONAL METHODS AND PERSONNEL PRACTICES	175
MAINTENANCE FOR FOOD SAFETY	175
CLEANING PRACTICES	<u>190</u>
<b>TOTAL:</b>	<b>910</b>

**INCIDENCE FREQUENCY REPORT (IFR)**

	AP	PC	OP	MS	CP	*TBA	UN	SER
PLANT OVERVIEW	3	2	1	0	1	7	0	0
EXTERIOR AND ROOF	0	0	0	1	0	1	0	0
SUPPORT AREAS	0	0	0	1	0	1	0	0
MAINTENANCE AREAS	0	0	1	0	0	1	0	0
WAREHOUSE	0	0	0	0	0	0	0	0
PEANUT BUTTER AND PASTE OPERATIONS	0	0	1	2	2	5	0	0
TOTAL ITEMS BY CATEGORY	3	2	3	4	3		0	0

\*TBA = TOTAL ITEMS BY AREA

AP = Adequacy of Food Safety Program

PC = Pest Control

OP = Operational Methods and Personnel Practices

MS = Maintenance for Food Safety

CP = Cleaning Practices

UN = Unsatisfactory

SER = Serious

## FACTUAL OBSERVATIONS AND SPECIFIC RECOMMENDATIONS

### PLANT OVERVIEW

1. COM A current organizational chart dated January 12, 2008, was maintained. The responsibility and authority for ensuring food safety and security, and the facility's compliance with federal, state, governmental, and/or any other appropriate regulatory laws or guidelines were clearly assigned to the Operations Manager. This responsible person remains up to date on regulatory issues and has obtained the required regulatory food security registration dated 11/0/03.
2. COM A Food Safety Manual had been developed. This manual included work instructions and/or job descriptions outlining the specific responsibilities of each department manager and employees, a Quality Policy signed by the Company President with a revision date of January 28, 2006, and written policies for the programs listed in the *AIB Consolidated Standards for Food Safety*.
3. AP **This facility had established a multidisciplinary food safety committee to conduct monthly inspections of the entire plant. Inspections were generally performed by the Operations Manager and/or Janitorial/Sanitation Director. Documentation of the monthly inspections included identified deficiencies, specific assignments, and actual accomplishments. Inspections reviewed included January, 2008, February, 2008, and March, 2008. Follow-up inspections were done to ensure that the items were corrected. In addition, systems and procedures critical to product safety and quality were audited to ensure they were in place, appropriate, and complied with. This audit was performed by the Quality Assurance Manager and Operations Manager annually, most recently on January 12, 2008, by the Operations Manager. Continued attention to items that had the potential to impact product zones was recommended. Items such as the paste room hoist maintenance, cleaning and sealing gaps in vertical support beams, and open ingredient containers in the peanut butter mixing area. (IMPROVEMENT NEEDED)**
4. COM The facility appeared to maintain an adequate budget and support to maintain the proper and timely acquisition of appropriate tools, materials, equipment, monitoring devices, chemicals, and pest control materials.

5. AP A Master Cleaning Schedule (MCS) and a daily housekeeping schedule were developed as a formalized, written plan and implemented in this facility. This MCS specified frequency and responsibility. Postcleaning evaluations were conducted. The schedules were documented as current, and the conditions observed in the plant supported the documentation. The schedule included the outside grounds, buildings, drains, and equipment. The schedule was reviewed periodically to ensure that it was still applicable. Continued emphasis on cleaning the edges around the peanut butter pour-up stations and the floor/wall junctions and gaps in the paste room were needed.
6. COM Detailed, written cleaning procedures were developed and on file for all cleaning tasks in the facility. These procedures included the chemicals, concentrations, tools, and disassembly instructions for equipment at the level needed to facilitate the appropriate sanitation maintenance of the processing and packaging equipment, building areas, and outside grounds. Specific cleaning procedures were developed to prevent cross-contamination amid allergen and non-allergen-containing products.
7. COM Incoming goods and ingredients received into the facility were inspected according to established written procedures. The incoming goods were checked for damage, cleanliness, and pest activity. The receiving records included date of receipt, carrier, lot number, amount, seal numbers (when applicable), and product and vehicle conditions. Raw materials that contain allergens or are susceptible to mycotoxins, autolysis from temperature abuse, or pathogenic microorganisms were segregated and covered by a separate written procedure with appropriate documentation.
8. COM Bulk deliveries of liquid materials included a visual inspection both before and after unloading. Verification was conducted that hatch and hose seals matched those listed on the bill of lading to ensure load integrity in transit. The findings were documented.
9. COM Appropriate specifications were on file for the raw materials, packaging materials, finished products, and intermediate/semiprocessed products. These specifications were detailed to ensure compliance with relevant food safety and legislative requirements. These specifications were periodically reviewed and formally agreed upon with relevant parties.
10. COM Certificates of analysis and/or supplier guarantees for raw materials, food packaging, and finished products were maintained on file.

11. COM A Hazard Analysis Critical Control Point (HACCP) program had been developed and implemented for all processes and process lines. The program included the following components: Description of the products manufactured and hazards inherent to them, determined through risk assessment; Identification of critical control points (CCP) and critical limits; Procedures to control the CCPs; Determination of the monitoring frequency for the CCPs and designation of the person(s) responsible for testing; Established and documented deviation procedures; Written verification program, with proper documentation; Documentation of procedures, records of conformance, and corrective actions. This facility had evaluated the processes and procedures and determined that no critical control points were present in the operation. The designated monitoring control points (MCPs) were specified and described. The most recent program reassessment had been performed by the Operations Manager on January 12, 2008.
12. COM The company had established written employee and Good Manufacturing Practices (GMPs) policies. Specific written procedures were on file for providing food safety training to all personnel, including temporary personnel and contractors. Employees also attended monthly food safety meetings that reviewed different aspects of food safety and GMPs. Records of training completion for new employees and annual refresher training documentation were maintained for all personnel. The most recent employee meeting was held on 03/05/08. Items covered included AIB, GMP, hand sanitation, spillage and clean-up. The annual employee training was held in January and February, 2008.
13. COM A written program for evaluating consumer complaints was established at this location. This program included the rapid dissemination of complaint information to all departments responsible for implementing the food safety program. Complaint information was used, where appropriate, to avoid recurrence and implement ongoing improvements to product safety, legality, and quality. Actions appropriate to the seriousness and frequency of the problems identified appeared to be carried out promptly and effectively.
14. COM A written recall program was on file. All finished products were coded. Product traceability was accomplished through the recording of raw material lot numbers on production records, and included source identification for work in progress and rework. Distribution records were maintained to identify the initial point of distribution to facilitate segregation and recall of specific lots. The recall program was tested every six months with appropriate documentation maintained on file. The most recent mock recall was done on January 15, 2008. The incoming peanut lot number tracked was 14675 received on October 18, 2007, from a known supplier. The peanut lot number was used in a number of manufactured products, manufacturing codes for 7 items were provided. The mock recall was completed in two hours and 15 minutes with 100 % effectiveness documented.

15. COM Written procedures were in place to control nonconforming product, including work in progress, finished product, and returned goods. Corrective actions equal to the seriousness of the risk appeared to be taken. Records were kept of the corrective actions and disposition of the product. The disposition records account for the total quantity of the nonconforming material produced.
16. COM A written policy on how to handle regulatory and third party inspections was on file. These procedures included the person(s) delegated to accompany all inspectors and company policies regarding photographs, records, and samples. The most recent regulatory inspection was done by the Georgia Department of Agriculture, Consumer Protection Division, on December 14, 2007. No violations were noted.
17. COM A written program to evaluate and select suppliers of goods and services that affect product quality and food safety had been implemented. An approved list of these suppliers was maintained. An approved list of these suppliers dated December 29, 2005, was maintained.
18. AP A written policy stating that no glass or brittle plastics were to be used in the facility, except where absolutely necessary, was in place. Included in the policy was a procedure on how to handle any glass breakage in the facility. A list of all essential glass had been developed and was audited on a routine frequency to ensure that any accidental breakage was found and addressed. The most recent audit was done on March 1, 2008. One deficiency was observed during this audit. Additional attention to cracked light covers was recommended.
19. COM A formal preventive maintenance program and work order system was in use to prioritize the elements of identified structural, equipment, or utensil maintenance problems that could cause food adulteration. The program listed the equipment and frequency of the work required to keep the equipment and facility well maintained and in good order. A program to ensure that the safety and legality of product were not jeopardized during maintenance operations was implemented at this facility.
20. COM This operation had established a formalized program for the control of bacteria, yeast, and mold as required. Records of laboratory analysis and/or environmental sampling were maintained. Environmental samples were sent to an approved, outside laboratory for testing. Finished product testing was determined by customer requirements and could include total plate count, coliforms, E. coli, Salmonella, and Staphylococcus aureus. All microbiological testing would be performed by an approved, outside laboratory. The on-site laboratory was maintained in such a manner as not to jeopardize the safety of product.

21. COM A formalized pest control program was established with written procedures outlining the requirements of the program to reduce the potential for product contamination from pest activity or use of materials and/or procedures designed to control pest activity.
22. COM Facility management contracted the McCall Services, Inc., Company to provide weekly pest control services for the exterior of the facility and the interior rodent control program. Also, McCall Services, Inc., provided weekly service for the interior insect light traps. A copy of the service agreement that included materials to be used, methods, and precautions was maintained on file. Copies of the current Georgia State Department of Agriculture license with an expiration date of 06/30/09, liability insurance with expiration date of 08/01/08, and current applicator's license with an expiration date of 06/30/09 were maintained on file. In addition, Adams Pest Control was contracted to perform weekly interior crack and crevice pesticide applications in the facility and offices. Copies of the Georgia State Department of Agriculture license with an expiration date of 06/30/09, liability insurance with expiration date of 03/01/09, and current applicator's license with an expiration date of 06/30/09.
23. COM Material Safety Data Sheets (MSDS) and sample labels were maintained on file for all pesticides applied and/or stored on the premises.
24. COM A service report was left after each visit by the outside pest control service. These records included the treatments and tasks carried out, documentation of the checks and findings for the pest monitoring devices, descriptions of the current levels of pest activity, and recommendations for actions needed to correct conditions allowing a potential for pest activity. The most recent interior service date was March 25, 2008, the most recent exterior service date was March 26, 2008.
25. COM Documentation of all pesticides applied on the premises, including rodenticides, included materials applied, target organism, amount applied, specific area where pesticide was applied, method of application, rate of application or dosage, date and time treated, and applicator's signature. This documentation indicated that the applications were made in accordance with the label directions. A pesticide list was provided. Pesticides used since the previous audit included Generation mini blocks, EPA registration number 7173-218 and Niban Granular Bait, # 64405-2. Entech Fog 5, # 40391-3, was used in the automatic fogging system on-site when needed. This system was operated by facility personnel. The Adams Pest Control pesticide being used for crack and crevice treatment was Bifen I/T, EPA registration # 53883-118.

26. COM Schematics depicting the locations of the interior and exterior pest control devices, including 60 mechanical Tin Cat rodent traps, four insect light traps, and 28 bait stations, were maintained on file and appeared current.
27. PC Mechanical mousetraps were installed to monitor for rodent activity inside the facility. These traps were properly positioned along walls and beside doors to the outside. The traps were inspected on a weekly basis, and a record was maintained of service and cleaning of each rodent control device. A rodent activity log used to record captures and help direct any necessary corrective actions. The traps randomly examined appeared properly maintained. During the interior inspection, it was noted that several Tin Cats were found to be moved out of position. Employees should be reminded to replace a trap when it is moved due to cleaning or maintenance in order to maintain an effective rodent control program.
28. COM Bait stations for rodent control were installed around the exterior perimeter of the facility at appropriate intervals. These stations were tamper resistant, properly positioned, anchored in place, locked, and properly labeled in compliance with regulatory requirements. All stations were serviced at least monthly. Fresh bait had been supplied in the stations randomly examined. The service and results of the checks were documented on plastic punch cards inside each trap and on the pesticide usage sheets provided.
29. PC Electronic flying insect light traps (ILT's) were used in the facility to aid in monitoring insect activity. These traps were more than ten feet (three meters) from exposed product. The traps were scheduled for weekly cleaning in the summer and monthly cleaning in the winter. A record of the service and cleaning of each ILT was maintained, and the activity levels documented. The light tubes were replaced annually and supporting documentation was maintained. The insect light trap located inside the caged ingredient storage room had one light not working and a glue board with many insects on it. The light bulb should be replaced and a new glue board should be installed.
30. COM Pheromone lures or traps were not currently in use in this facility.
31. COM All pesticides and application equipment used as part of the on-site automatic fogging system were stored in a locked and ventilated room identified with appropriate signage. Materials to control spills or leakage were provided in the storage enclosure. All other pesticides and application equipment were provided by the contract PCOs. No deviations were noted during the facility inspection.
32. COM No evidence of rodent or bird activity was noted in or around the facility.

33. OP Eighteen-inch perimeters were generally maintained in all storage areas to provide cleaning and inspection access. Adequate space for cleaning was maintained between rows of stored products. However, several cardboard boxes were stored on the perimeter in the UPS shipping corner and several buckets and containers on the perimeter inside the chemical storage cage. Items stored on the perimeter in the UPS shipping corner and the chemical cage should be elevated to allow inspection and cleaning.
34. COM All incoming ingredients and packaging materials were dated on receipt to ease 'first-in, first-out' stock rotation. A formal program was in place to monitor and repalletize raw materials susceptible to stored product pest activity that were in storage for more than four weeks. Ingredients noted included stabilizer, flour salt, and molasses powder.
35. COM Materials in storage were adequately segregated to prevent contamination. Segregated storage was provided for allergen containing ingredients, packaging materials, Research and Development items, cleaning and maintenance chemicals, nonconforming stock, and nonproduct related materials, such as parts and equipment.
36. COM Metal detection equipment was provided on each product line. The metal detectors were checked regularly throughout the shift using the relevant test pieces for 2.0 mm ferrous, 2.0 mm nonferrous, and 2.0 mm 316 stainless steel. The detectors employed the use of both an alarm and a positive reject mechanism. Rejected material was diverted into a secured container or was removed from the line. Documentation of the checks was maintained. The detectors were checked during the survey and found properly to detect and reject the provided test pieces. It was noted that the case metal detectors did not reject product but used a belt stop as the rejection method. This was due to the size of the container and the loose product involved. The peanut butter metal detector was a flow-thru unit and rejected into a container.
37. COM Procedures for corrective actions to respond to any failure of the metal detectors were on file. These included training, isolation, quarantining, and reinspection of all food produced since the last acceptable test of the metal detector.
38. COM Company policy required that all employees' cuts and grazes on exposed skin be covered by a company-issued metal detectable metal strip bandage. These bandages were tested on a predetermined frequency through a metal detector and supporting documentation was maintained.
39. COM All outside receiving lines or caps for bulk liquid ingredients were locked and identified. The liquid nitrogen tank and receiving line were located inside a locked fence enclosure.

40. COM Accessible and cleanable in-line receiving strainers had been provided for the bulk liquid ingredients. The strainer was examined on a per load basis, and documentation was maintained. The receiving strainer was checked during the survey and found clean and in good condition.
41. COM Adequate hand washing and sanitizing stations were located at appropriate locations and used properly by the employees. "Wash Hands" signs were displayed in the rest rooms, lunchroom, and by sinks and entryways to production areas.
42. COM The washrooms and locker rooms were maintained in an acceptable sanitary condition. The lockers were inspected monthly as a sanitary control, and no open food or drink was allowed.
43. COM A formal allergen program dated January 18, 2005, and reviewed on January 12, 2008, was in place that included written policies and procedures. Effective measures were undertaken to prevent cross contamination amid incompatible materials.
44. COM All shipping vehicles were inspected before loading for cleanliness and structural defects that could jeopardize product integrity, and documentation was maintained. Security seals were provided on and documented for all outbound vehicles.
45. COM Employees observed in the facility were wearing adequate hair and beard restraints. Their clothing and uniforms were clean and well maintained. No evidence of loose or unsecured jewelry was noted.
46. COM No evidence of eating, drinking, or smoking in unauthorized areas was observed. No smoking was allowed except on the exterior of the facility.
47. COM All personal property was stored in appropriate locations defined by company policy.
48. COM Some measures were undertaken to maintain site security. Site security strategies included fencing, controlled gate access at night, parking outside the fenced area, locked doors at night, employee entrance had keypad entry, interior and exterior surveillance cameras, truck seals, employee screening, and awareness and training programs.
49. COM The exterior grounds were adequately maintained to prevent pest harborage. Waste collection containers were located approximately 100 feet behind the facility and spillage was kept to a minimum.

50. COM Fixtures, ducts, and pipes were generally properly installed and maintained to prevent contamination from leaks, condensation, or insulating material.
51. COM Adequate ventilation was provided in the facility. Filters were in place in air make up units. Fans were maintained and operated in a manner to avoid product contamination.
52. COM A calibration program was in place for all regulating and recording controls. This was included as part of the facility Standard Operating Procedures. Accurate Scale Company, also the Georgia Department of Agriculture, Scales and Measures Division, tested the facility scales. The roaster companies, Proctor, AeroGlide, and Pittman oil roasters were used to standardize the roaster control systems. Temperatures were monitored internally to assure proper temperature control.
53. COM Compressed air used in processing was properly filtered, and a program was in place to inspect and replace traps and/or filters.
54. COM Only food grade lubricants were used on food processing machines. These lubricants were fully segregated in a designated location, the maintenance shop.
55. COM Potable water was supplied from an appropriate source, the Blakely City Water System. A program was in place to monitor water quality. The facility had a report from the city based on the Clean Water Act requirements.
56. COM Devices were installed and maintained where appropriate to prevent backflow and/or back siphonage. While the facility did not have in-line back flow prevention devices, anti-siphon devices were observed on faucets located around and inside the facility.
57. COM All fluorescent light tubes, essential glass, and brittle plastic in the facility appeared to be protected from accidental breakage, or were accounted for in the Glass and Brittle Plastics Management Program.
58. COM The floors, walls, and ceilings throughout the plant were generally of sound construction and well maintained. No roof leakage was evident.
59. COM An ongoing housekeeping program was in place throughout the hours of operation so that operational debris was kept to a minimum.

60. CP Adequate cleaning equipment and tools were available and stored away from the production areas. During the facility inspection, several wooden-handled utensils were observed, such as scrapers and sweepers. It was recommended that no wooden-handled utensils be used in food production areas due to the possibility of splintering or breakage.
61. COM The equipment was cleaned according to the MCS to prevent the development of microorganisms, insects, or foreign material.
62. COM Food contact cleaning surfaces and utensils were cleaned often enough to remove food residue and maintain a good cosmetic appearance.
63. COM Only cleaning compounds and sanitizers that are authorized for use on food contact surfaces were used for cleaning. The chemical control program consisted of purchasing from approved vendors only. Materials purchased were approved by the sanitation Director or maintenance manager prior to purchase. In addition, chemicals used for cleaning were kept in a locked cage inside the plant warehouse.
64. COM The maintenance cleaning practices were found satisfactory. The maintenance debris, tools, and other items generated during maintenance activities were removed from the work area.
65. COM This facility had an automated Entech fogging system for fogging the interior of the plant. This system was operated inside a fenced, gated and locked enclosure inside the facility. It was noted that the plant used a pre-operational inspection procedure that included additional cleaning when noted on the inspection checklist. The pre-operational inspector would be notified when fogging had occurred and would require cleaning of product zones prior to releasing the equipment for operation. This general program was documented for review.

## **EXTERIOR AND ROOF**

66. COM No issues were observed on the roof of the facility. All air intakes were properly screened to prevent any pest access into the facility.
67. MS A break in the concrete block wall was observed next to dock door 5 on the north exterior wall of the facility. The break in the concrete block should be properly sealed to prevent any possible pest entry or harborage in the block wall.
68. COM The paved areas around the facility had been repaired since the previous audit. No issues with standing water or potholes were noted.

69. COM During the exterior inspection, it was noted that the dumpsters used for trash or garbage were located away from the building. The dumpsters were open, but all trash in the dumpsters was being secured inside tied plastic bags. This would prevent possible pest (bird) attraction to the dumpsters.

## **SUPPORT AREAS**

70. COM The employee break room and employee rest rooms were inspected and found to be properly cleaned and maintained.
71. MS In the wash room, a broken plastic light shield was observed. It was noted that all fluorescent lights in the facility were shatter-resistant. However, the broken plastic should be removed to prevent possible fragmentation into the wash room. This was not an open product area.

## **MAINTENANCE AREAS**

72. OP Maintenance areas inspected during the audit were found to be generally clean and maintained. Continued attention to storing items so that perimeter inspections can be performed was recommended.

## **WAREHOUSE**

73. COM In the warehouse caged area, the insect light trap had a bulb that was not working. Also the glue board had a number of insects trapped. The light bulb should be replaced and the glue board should be replaced to provide an effective insect monitoring program in this storage area.
74. COM The top of the break room was inspected and found to be generally clean and properly maintained.
75. COM The general warehouse storage areas were inspected and found to be properly organized and well maintained. No spillage or torn ingredient containers were observed.

## PEANUT BUTTER AND PASTE OPERATIONS

76. OP **In the peanut butter mixing operation, several instances of open ingredient containers were observed in the area of the mixer located on the roof of the peanut butter room. Ingredient containers should be closed or secured when not in use in order to prevent possible product contamination due to materials falling into the ingredients being used. (IMPROVEMENT NEEDED)**
77. MS In the peanut butter room, the plastic motor fan cover for the blender motor was broken and damaged. While the blender was covered, the plastic cover could fragment and should be replaced.
78. COM In the votator room, the peanut butter transfer piping passageway had loosened and created a gap in the wall seal. In order to prevent any possibility of insect harborage, the wall opening should be re-sealed.
79. CP In the corner by the peanut butter peanut pour-up stations, product residue accumulation was noted on the horizontal beams and in the corner at the floor/wall junction. Several live sawtooth grain beetles were noted in the residue. This area should be thoroughly cleaned and monitored to prevent further buildup and possible insect development.
80. MS **In the paste room, the hoist cable had a label located above the peanut hopper that was peeling and could fall into the peanut hopper. The label was immediately removed. Attention should be paid to all items located above open zones. (IMPROVEMENT NEEDED)**
81. CP In the northeast corner of the paste room, a gap was noted between vertical roof support beams. This gap had product residue accumulated in the small opening between the beams. A live sawtooth grain beetle was found in the residue. This gap should be thoroughly cleaned to remove all product residue. In addition, it was recommended that the gap be sealed with concrete to remove the gap and provide a cleanable surface.

## Food Safety & Quality Audit With Security

Company Information	Audit Information
<p>Facility: C0000058 - PEANUT CORPORATION OF AMERICA</p> <p>Address: HIGHWAY 62 E BLAKELY, GEORGIA UNITED STATES , 39823</p> <p>Contact: MR. DANNY KILGORE</p> <p>Title:</p> <p>Phone: 229-723-3411</p> <p>Fax:</p> <p>Email: danny.kilgore@peanutcorp.com</p>	<p>Audit#-Visit#: 156233 - 116355</p> <p>Audit Type: BASE1SEC-Food Safety &amp; Quality Audit With Security</p> <p>Template Version: 1.1</p> <p>Audit Category: REGULAR</p> <p>Auditor: BILL BURGESS</p> <p>Auditor Phone: 912-634-8531</p> <p>Audit Start Time: 29-APR-2008 08:00:00 AM</p> <p>Audit End Time: 30-APR-2008 05:00:00 PM</p>

### Facility And Operating Profile

No	Question/Notes
1	<p>Facility and Operations Description:</p> <p>Auditor's Notes: The facility, originally built in 1982, is located in a light Industrial area east of Blakely, GA. With a trucking company and nut blanching operation on either side, the facility has a fenced perimeter and a 32,000 square feet building (20,000 production). Operating with 50 employees, there are two producing shifts (roasting on second) over a 5 day schedule.</p>
2	<p>Regulatory Inspection Type: FDA, Georgia State Dept. of Agriculture, USDA Vendor Programs</p>
3	<p>Products made at this facility: Peanut products</p>
4	<p>Products made for the client: Raw, Oil Roast, Dry Roast, Granulated, and Peanut Butter</p>
5	<p>What is the average lot size in pounds (coded and identifiable)? 20,000</p>
6	<p>What is the most probable cause of accidental product contamination? Field related items (sticks, stems, rocks)</p>
7	<p>The following departments and individuals participated in the audit process: Operations Manager, Danny Kilgore.</p>
Section Notes:	

### Score Summary By Section

Section Name	Section Score
Section A - Administration and Regulatory Compliance	87.00%
Section B - HACCP Management	89.00%
Section C - Facilities and Equipment	85.00%
Section D - Sanitation, Housekeeping and Hygiene	85.00%
Section E - Rodent and Pest Control Management	87.00%
Section F - Receiving and Inventory Control	94.00%
Section G - Process and Product Evaluation	94.00%
Section H - Packaging and Labeling	96.00%
Section I - Storage and Shipping	96.00%
Section J - Analytical Records and Laboratory Support	95.00%
Section K - Food Defense	95.00%
Food Safety, Quality and Food Defense Audit Average Score:	91.18%
Section 2.A - Awareness	94.00%
Section 3.A - Employees, Contractors and Visitors	87.69%
Section 4.A - Plant Security Measures	100.00%
Section 5.A - Ingredient Safety	100.00%
Section 6.A - Utilities	100.00%
Section 7.A - In-Plant Hazardous Materials	100.00%
Section 8.A - Process Security	98.75%
Section 9.A - Warehouse and Transportation	91.67%
Section 10.A - Traceability	100.00%
Section 11.A - Tamper Evident Packaging	100.00%
Section 12.A - Crisis Management	90.00%
Security Audit Average Score:	96.61%

#### Category Scoring Guide

95-100 = Meet or Exceeds Audit Expectations ( Acceptable - Excellent )  
 85-94 = Opportunity For Improvement ( Minor )  
 75-84 = Needs Improvement ( Major )  
 <75 = Immediate Improvement Needed ( Critical )

#### Automatic Audit Failure

Direct Product Contamination.  
 Adulterated or Misbranded product .  
 Facility was not operating in sanitary condition.  
 HACCP System Failure - Plant was producing product that did not meet critical limit(s); appropriate corrective action was not taken; or no HACCP Plan if mandated by regulations.  
 Critical Deficiency in any one category.

### Overview

No	Question/Notes
	<p>Notes from the auditor: See Notes</p> <p>This is the first NSF Food Processing and Product Security Audit for the Blakely, GA facility of Peanut Corporation of America. Plant management is shorthanded as they have been without a Quality Assurance Manager since December, 2007. The top management person at the facility, the Operations Manager, has assumed the QA role until a new Quality Manager has been hired. This is a small facility with 50 employees that operates with managers assuming more than their primary role.</p> <p>The facility has basic security through personnel policies, cameras, key lock doors and fenced perimeter. Product security includes: receiving policies, transport inspections, minor ingredient security and sealed full shipments. Continued periodic security reviews for facility and product are important.</p> <p>As the findings show, documentation of present programs for consistency and continuity are important. Details for the Recall program, Crisis Management, Allergen management, and sanitation reports are examples.</p> <p>Management has an understanding of the quality and security needs for a food processing facility, yet, there are details as indicated in the report, that need to be corrected. Primary areas are facility condition, sanitation and pest control, along with documentation of major programs that need attention. Details in the report point out specific findings for correction which can be the basis for daily facility review to determine if similar situations exist. While there were no critical items observed, the potential exists for more serious issues.</p> <p>Product traceability exercises are conducted twice per year with a review of the process. Changes have been implemented to better identify the use of rework in production and speed up the tracing process. Two tracings conducted this year have been successful during the required time period.</p>
Section Notes:	

### Non-Compliance Summary

No	Question/Notes	Answer
Section A /4	<p><b>Recall Plan and Procedures</b></p> <p>A plant specific Recall Plan must be available. The plan must include all necessary contact information. All documentation related to product traceability must be available. A traceability exercise must be conducted at least twice per year.</p> <p>The recall procedure lacks a designated recall coordinator and a public relations spokesperson.</p>	Minor*
Section A /7	<p><b>Change Management</b></p> <p>There must be a policy in place to manage and communicates changes in specifications, policies and procedures in order to maintain continuity and the control of systems.</p> <p>A procedure for change management has not been developed.</p>	Minor*
Section A /10	<p><b>Crisis and Natural Disaster Management</b></p> <p>A crisis management plan must be in place that defines emergency procedures, outlines the crisis team members and provides key contacts with 24/7 access.</p> <p>A Crisis Management team handles recalls with a documented procedure. There is not a procedure to handle emergencies, natural disasters or other such events.</p>	Minor*
Section B /2	<p><b>Preliminary HACCP Tasks</b></p> <p>A HACCP team must be assembled with team member responsibilities clearly identified. Process flow diagrams outlining each step in the process must be constructed by the HACCP Team and they must perform an on site review to verify its accuracy.</p> <p>There have not been team member responsibilities established or team meetings.</p>	Minor*
Section B /3	<p><b>Hazard Analysis (HACCP Principle 1)</b></p> <p>The HACCP team must prepare a list of all chemical, physical and biological hazards that may occur and conduct a hazard analysis to identify the hazards that are critical and controllable.</p> <p>There is not a documented detail of Hazard Analysis for each of the process steps.</p>	Minor*

### Non-Compliance Summary

No	Question/Notes	Answer
Section C /1	<p><b>Potable Water, Ice, Backflow Prevention, Steam and Waste Water Management</b></p> <p>The plant must demonstrate that the water supply is potable and that potability is maintained at all times. Potability must meet local requirements at a minimum. Water lines and hose drops must be fitted with backflow prevention devices that are tested by a trained inspector at least annually. There can be no dead ends on potable water lines. Hose nozzles must not be submerged in water reservoirs or left laying on the floor. An adequate supply of hot and cold water must be readily available for production, sanitation and handwashing. The facility must have a procedure for handling backed up drains.</p> <p>Backflow devices are in place yet are not verified on an annual basis</p>	Minor*
Section C /2	<p><b>Plant Construction and Design</b></p> <p>The construction of the facility must be such that it facilitates the production of wholesome product and that it meets the customer and regulatory food safety and quality requirements. Materials must be easily cleanable, floors well drained and drains must have traps and covers. The plant must be designed in a manner appropriate to prevent the contamination of product. A glass and brittle plastic program must be in place.</p> <p>The platform over the two product lines leading to the dry roast swing arm only has "toe" height board around the edges. The floor is chipped near the end of the oil roast line. Tape over a Bin on the mezzanine is fraying.</p>	Minor*
Section C /3	<p><b>Plant Condition (Walls, Ceilings, Floors, etc.)</b></p> <p>Walls, ceilings and floors must be well maintained, orderly, clean and sealed. No evidence of water leakage, rust or flaking paint. No string, rope, wire or tape used as supports or temporary repairs. Overhead structures must be clean and free of buildup.</p> <p>Numerous screw holes are in the metal wall near the Peanut Butter Kettle and in the packaging storeroom. The cloth gasket on the edges at the end of the Dry Roast belt is beginning to fray. Duct tape is used on the seams for the wall panels in the cool room.</p>	Minor*
Section C /4	<p><b>Ready To Eat (RTE) Operational Areas</b></p> <p>Ready to Eat areas must be separated and effectively isolated from other operations. Filtered air supplies must provide a positive room air pressure and filters must be routinely inspected and maintained for maximum efficiency.</p> <p>The plant air flow is negative bringing outside air into an area where Ready-To-Eat products that have already been through a kill step are exposed to the plant environment.</p>	Minor*
Section C /7	<p><b>Equipment Layout, Design and Conditions</b></p> <p>Equipment must be designed, installed and maintained in a manner that provides a safe, wholesome and quality product with easy access for cleaning and sanitizing. Product contact surfaces must be constructed with materials that are smooth, impervious, non-toxic, non-absorbent and corrosion resistant with appropriate covers and no metal-to-metal contact between moving parts.</p> <p>The sweep arm depositing peanuts on a belt is rusty. Clear tape is used to hold a plastic pipe directing granular peanuts to further conveyance.</p>	Minor*
Section C /9	<p><b>Maintenance Standard (Support of GMPs, Housekeeping, Lubricants)</b></p> <p>There must be a documented preventative maintenance program that covers the equipment and facilities. Permanent repairs must be made promptly. Food-grade and non-food grade lubricants can not be stored together.</p> <p>No Preventative Maintenance or work order program is documented.</p>	Minor*
Section D /1	<p><b>Master Sanitation List and Monitoring</b></p> <p>There must be a documented cleaning procedure for operational areas, equipment, warehouse, storage, maintenance, employee support areas and other plant areas. There must be scheduled tasks for all cleaning procedures that are monitored and documented.</p> <p>The Master Sanitation List does not cover the process or warehouse areas.</p>	Minor*
Section D /2	<p><b>Standard Sanitation Operating Procedures and Monitoring</b></p> <p>There must be documented Standard Sanitation Operation Procedures detailing the cleaning methods and frequency of cleaning for all equipment and facility structures. All cleaning and sanitizing must be documented and monitored. Records must be kept of all deficiencies found and the corrective action that is taken to bring the equipment into a sanitary condition and prevent a reoccurrence.</p> <p>Standard Operating Procedures for cleaning were not available.</p>	Minor*

### Non-Compliance Summary

No	Question/Notes	Answer
Section D /4	<p><b>Pre Op Monitoring and Corrective Action</b></p> <p>A routine documented inspection program must be in place to assess sanitation practices and conditions prior to daily operation. Deficiencies must be noted and corrective actions taken.</p> <p>In a review of the Pre-Op documents for the Dry Roast line for March 2008, there were numerous documents that indicated additional cleaning was needed, yet no corrective action was documented. Also signatures for verification of the Pre-Op monitoring were inconsistent.</p>	Minor*
Section D /6	<p><b>Operational Housekeeping and Monitoring</b></p> <p>All areas of the plant must be kept clean, orderly and free from accumulation of litter. Garbage, trash and waste materials must be accumulated in identified containers and disposed of properly. Floor drains must be kept clean, odor free and covered. No tool storage or materials on top of equipment, electrical boxes or window ledges.</p> <p>A fan in the Peanut Butter packaging area had dusty blades and grill. A wrench and scraper were stored on a shelf over the processing line. Per the management, the white buckets are to be used for edible materials and red buckets for inedible materials. Observations indicate the white and red buckets are both used for trash and inedible materials.</p>	Minor*
Section D /8	<p><b>RTE Sanitation and Corrective Action</b></p> <p>Employees working in Ready to Eat (RTE) areas must take additional precautions to protect product from microbiological cross contamination. Personnel handling RTE food must wear sanitary gloves.</p> <p>Outer clothing in Ready-To-Eat processing areas is to be dedicated to that area. Note the conditions indicated in C.4.</p>	Minor*
Section E /1	<p><b>Documented and Specific Pest Control Program</b></p> <p>There must be a pest management program in place that is overseen by a licensed Pest Control Operator (PCO). Site maps for all traps and bait stations, documentation of services, Material Safety Data Sheet (MSDS), the PCO applicators license and letter of insurance must be current and on file.</p> <p>Non-certified personnel are applying pesticides (herbicide Round-Up / Honcho Plus).</p>	Minor*
Section E /4	<p><b>Pest Tight Doors and Entrance Closures</b></p> <p>All doors must be tight closing and no exterior holes/cracks in walls, pipe chase, vent openings, windows, etc., to provide easy access to pests.</p> <p>Dock doors (3 and 4) and personnel doors (SE corner of building and at Bulk Peanut Butter loading) did not have a good seal.</p>	Minor*
Section E /5	<p><b>Secure Storage and Documentation of Pest Related Chemicals</b></p> <p>If pest related chemicals are stored on site, they must be stored in a secured location with limited access. An up to date inventory log of chemicals must be maintained. Containers must be destroyed once empty. Safety precautions for storage of pest related chemicals must be available.</p> <p>There was a container of herbicide unsecured on an outside table.</p>	Minor*
Section F /4	<p><b>Storage and Handling Policies and Practices</b></p> <p>There must be established procedures to assure that ingredients and supplies do not become a source of contamination. Receiving areas and storage locations must be maintained in a clean and sanitary manner. All ingredients and supplies must be held under conditions necessary to maintain product integrity.</p> <p>Condensation from an air conditioner is draining to the floor of the secured ingredient area.</p>	Minor*
Section G /6	<p><b>Allergen and Sensitive Ingredient Controls</b></p> <p>In facilities where allergens or sensitive ingredients are present, there must be detailed procedures to prevent the contamination of other products. Products containing allergens must be labeled as required by regulations.</p> <p>A detailed documented allergen program for production and training is needed since there are different allergenic ingredients potentially used in addition to the primary peanut products.</p>	Minor*

### Section A Administration and Regulatory Compliance

No	Question/Notes	Answer
1	<p><b>Food Safety, Quality and Food Defense Organization and Responsibilities</b></p> <p>There must be a plant management organization chart that shows the reporting structure of the plant operating departments. The chart must clearly show the reporting relationship of the Quality Manager.</p>	Acceptable
2	<p><b>Food Safety, Quality and Food Defense Policies and Procedures</b></p> <p>There must be policies and procedures that address relevant food safety, quality and security requirements for the receiving, handling, manufacturing and shipping of product. The expectations should be defined through product and process specifications, testing procedures, sampling programs and accept/reject criteria.</p>	Acceptable
3	<p><b>Specific Training Goals and Programs for Management and Operating Personnel</b></p> <p>Documents must be available to demonstrate managements commitment to a planned training program for both management and food production personnel. The plan must include training of all new employees and refresher training for all current employees on a regular basis.</p>	Acceptable
4	<p><b>Recall Plan and Procedures</b></p> <p>A plant specific Recall Plan must be available. The plan must include all necessary contact information. All documentation related to product traceability must be available. A traceability exercise must be conducted at least twice per year.</p> <p>The recall procedure lacks a designated recall coordinator and a public relations spokesperson.</p>	Minor*
5	<p><b>Regulatory Compliance</b></p> <p>The facility must maintain a file of regulatory actions, visits, reports or other notifications received from any regulatory agency. Written responses with appropriate corrective actions must be documented. A log of samples submitted for pathogen, antibiotic or environmental testing must be maintained.</p>	Acceptable
6	<p><b>Document and Records Management</b></p> <p>A document control policy must be in place that covers all aspects of creating, storing and disposing of documents.</p>	Acceptable
7	<p><b>Change Management</b></p> <p>There must be a policy in place to manage and communicates changes in specifications, policies and procedures in order to maintain continuity and the control of systems.</p> <p>A procedure for change management has not been developed.</p>	Minor*
8	<p><b>Documentation to Track Effectiveness of Policies</b></p> <p>Management reviews must take place to evaluate the level of conformance to operational policies.</p>	Acceptable
9	<p><b>Management Awareness and Commitment to Food Safety, Quality &amp; Food Defense</b></p> <p>Management must be committed to food safety and quality. There active support should be shown through training programs, auditing for compliance to policies and provision of corrective actions.</p>	Acceptable
10	<p><b>Crisis and Natural Disaster Management</b></p> <p>A crisis management plan must be in place that defines emergency procedures, outlines the crisis team members and provides key contacts with 24/7 access.</p> <p>A Crisis Management team handles recalls with a documented procedure. There is not a procedure to handle emergencies, natural disasters or other such events.</p>	Minor*
11	<p><b>Customer/Consumer Complaints (Policies, Follow Up and Response)</b></p> <p>There must be a customer complaint program in place that addresses responsibilities, response time and corrective actions based on the investigation of a complaint.</p>	Acceptable
Section notes:		

### Section B HACCP Management

No	Question/Notes	Answer
1	<p><b>Prerequisite Programs</b></p> <p>Prerequisite programs must be well developed, documented and monitored.</p>	Acceptable

### Section B HACCP Management

No	Question/Notes	Answer
2	<p><b>Preliminary HACCP Tasks</b> A HACCP team must be assembled with team member responsibilities clearly identified. Process flow diagrams outlining each step in the process must be constructed by the HACCP Team and they must perform an on site review to verify its accuracy. There have not been team member responsibilities established or team meetings.</p>	Minor*
3	<p><b>Hazard Analysis (HACCP Principle 1)</b> The HACCP team must prepare a list of all chemical, physical and biological hazards that may occur and conduct a hazard analysis to identify the hazards that are critical and controllable. There is not a documented detail of Hazard Analysis for each of the process steps.</p>	Minor*
4	<p><b>Critical Control Points (HACCP Principle 2)</b> Documentation for determining a step or process as a CCP or not, must be clearly explained. Meetings must be conducted on a regular basis by the HACCP team to review any changes in the process that might affect the CCP determination. No Critical Control Points have been established.</p>	N/A
5	<p><b>Critical Limits (HACCP Principle 3)</b> Control measures identifying operating and critical limits must be established and for each CCP. All critical limits must be measurable. Process capabilities must be documented to establish that CCP limits are compatible with the plant process and that limits are attainable. No Critical Control Points have been established. for which to develop critical limits.</p>	N/A
6	<p><b>CCP Monitoring (HACCP Principle 4)</b> CCP monitoring procedures must be conducted at a frequency sufficient enough to detect any loss of control. The data must be evaluated by those empowered to implement corrective actions and must be documented on HACCP records. No monitoring has been established since no Critical Control Points have been established.</p>	N/A
7	<p><b>Corrective Actions (HACCP Principle 5)</b> Corrective actions must be developed for each CCP including instructions with the necessary actions to take to secure product and bring the CCP under control in the event a critical limit is exceeded. No corrective actions have been established since no Critical Control Points have been established.</p>	N/A
8	<p><b>Verification and Validation (HACCP Principle 6)</b> Documentation must be available confirming the HACCP plan is scientifically and technically sound. The documentation should also confirm that all hazards have been identified and CCPs are effective and valid. Validation of the plan must be performed and documented on an annual basis. No verification of CCP monitoring has been established.</p>	N/A
9	<p><b>Documentation and Record Keeping (HACCP Principle 7)</b> HACCP procedures must be documented with detailed corrective actions and product dispositions. Final records must be in ink, signed by the appropriate personnel and without missing data or blanks. Records must be securely stored and easily retrievable. The HACCP Plan has been reviewed and documented on an annual basis.</p>	Acceptable
<p><b>Section notes:</b> A HACCP program even if voluntary has a specific format such as a detailed Hazard Analysis based on items that include chemical, physical, biological hazards of a process flow chart. The consideration of a CCP can be based on current scientific studies (temperatures of similar processes) or existing regulatory statements (FDA documents for metal detection).</p>		

### Section C Facilities and Equipment

No	Question/Notes	Answer
1	<p><b>Potable Water, Ice, Backflow Prevention, Steam and Waste Water Management</b> The plant must demonstrate that the water supply is potable and that potability is maintained at all times. Potability must meet local requirements at a minimum. Water lines and hose drops must be fitted with backflow prevention devices that are tested by a trained inspector at least annually. There can be no dead ends on potable water lines. Hose nozzles must not be submerged in water reservoirs or left laying on the floor. An adequate supply of hot and cold water must be readily available for production, sanitation and handwashing. The facility must have a procedure for handling backed up drains. Backflow devices are in place yet are not verified on an annual basis</p>	Minor*

### Section C Facilities and Equipment

No	Question/Notes	Answer
2	<p><b>Plant Construction and Design</b></p> <p>The construction of the facility must be such that it facilitates the production of wholesome product and that it meets the customer and regulatory food safety and quality requirements. Materials must be easily cleanable, floors well drained and drains must have traps and covers. The plant must be designed in a manner appropriate to prevent the contamination of product. A glass and brittle plastic program must be in place. The platform over the two product lines leading to the dry roast swing arm only has "toe" height board around the edges. The floor is chipped near the end of the oil roast line. Tape over a Bin on the mezzanine is fraying.</p>	Minor*
3	<p><b>Plant Condition (Walls, Ceilings, Floors, etc.)</b></p> <p>Walls, ceilings and floors must be well maintained, orderly, clean and sealed. No evidence of water leakage, rust or flaking paint. No string, rope, wire or tape used as supports or temporary repairs. Overhead structures must be clean and free of buildup.</p> <p>Numerous screw holes are in the metal wall near the Peanut Butter Kettle and in the packaging storeroom. The cloth gasket on the edges at the end of the Dry Roast belt is beginning to fray. Duct tape is used on the seams for the wall panels in the cool room.</p>	Minor*
4	<p><b>Ready To Eat (RTE) Operational Areas</b></p> <p>Ready to Eat areas must be separated and effectively isolated from other operations. Filtered air supplies must provide a positive room air pressure and filters must be routinely inspected and maintained for maximum efficiency.</p> <p>The plant air flow is negative bringing outside air into an area where Ready-To-Eat products that have already been through a kill step are exposed to the plant environment.</p>	Minor*
5	<p><b>Employee Support Facilities</b></p> <p>The cafeteria, locker room and toilet facilities must be adequately sized, physically separated from food production areas and maintained in a sanitary condition. Toilet facilities must be well ventilated, doors must be self-closing and can not open directly into the production areas. Signs must be clearly posted in locker rooms, toilet facilities and at entrances to work areas reminding employees to wash and sanitize their hands before starting work and when leaving toilet facilities.</p>	Acceptable
6	<p><b>Handwashing Facilities</b></p> <p>Hand washing facilities must be provided in locker rooms, toilet facilities and at entrances to work areas. They must be adequate in size, quickly deliver tempered water and maintained with hand soap and single service towels. Hands-free activated faucets must be available in and adjacent to processing areas.</p>	Acceptable
7	<p><b>Equipment Layout, Design and Conditions</b></p> <p>Equipment must be designed, installed and maintained in a manner that provides a safe, wholesome and quality product with easy access for cleaning and sanitizing. Product contact surfaces must be constructed with materials that are smooth, impervious, non-toxic, non-absorbent and corrosion resistant with appropriate covers and no metal-to-metal contact between moving parts.</p> <p>The sweep arm depositing peanuts on a belt is rusty. Clear tape is used to hold a plastic pipe directing granular peanuts to further conveyance.</p>	Minor*
8	<p><b>Plant Lighting and Protection</b></p> <p>Adequate illumination must be provided and lighting must be protected from breakage and possible contamination. Light fixtures must be maintained clean, free of cracks, dust or other materials that could cause contamination.</p>	Acceptable
9	<p><b>Maintenance Standard (Support of GMPs, Housekeeping, Lubricants)</b></p> <p>There must be a documented preventative maintenance program that covers the equipment and facilities. Permanent repairs must be made promptly. Food-grade and non-food grade lubricants can not be stored together.</p> <p>No Preventative Maintenance or work order program is documented.</p>	Minor*
<p><b>Section notes:</b> Peanut products as produced at this facility are a direct consumable product without further treatment by the consumer. Considerations as a Ready-To-Eat Product need to be kept in mind for the production and storage environment.</p>		

### Section D Sanitation, Housekeeping and Hygiene

No	Question/Notes	Answer
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### Section D Sanitation, Housekeeping and Hygiene

No	Question/Notes	Answer
1	<p><b>Master Sanitation List and Monitoring</b> There must be a documented cleaning procedure for operational areas, equipment, warehouse, storage, maintenance, employee support areas and other plant areas. There must be scheduled tasks for all cleaning procedures that are monitored and documented. The Master Sanitation List does not cover the process or warehouse areas.</p>	Minor*
2	<p><b>Standard Sanitation Operating Procedures and Monitoring</b> There must be documented Standard Sanitation Operation Procedures detailing the cleaning methods and frequency of cleaning for all equipment and facility structures. All cleaning and sanitizing must be documented and monitored. Records must be kept of all deficiencies found and the corrective action that is taken to bring the equipment into a sanitary condition and prevent a reoccurrence. Standard Operating Procedures for cleaning were not available.</p>	Minor*
3	<p><b>Cleaning Chemical and Sanitizer Control</b> There must be procedures that specify the proper dilution of chemicals and/or sanitizers. All chemical containers must be properly labeled and used for their intended purpose only. Chemicals must be securely stored during periods of non-use.</p>	Acceptable
4	<p><b>Pre Op Monitoring and Corrective Action</b> A routine documented inspection program must be in place to assess sanitation practices and conditions prior to daily operation. Deficiencies must be noted and corrective actions taken. In a review of the Pre-Op documents for the Dry Roast line for March 2008, there were numerous documents that indicated additional cleaning was needed, yet no corrective action was documented. Also signatures for verification of the Pre-Op monitoring were inconsistent.</p>	Minor*
5	<p><b>Verification of Cleaning Effectiveness</b> The effectiveness of the sanitation program must be monitored visually prior to production and supplemented with an objective measurement at a frequency that demonstrates effectiveness.</p>	Acceptable
6	<p><b>Operational Housekeeping and Monitoring</b> All areas of the plant must be kept clean, orderly and free from accumulation of litter. Garbage, trash and waste materials must be accumulated in identified containers and disposed of properly. Floor drains must be kept clean, odor free and covered. No tool storage or materials on top of equipment, electrical boxes or window ledges. A fan in the Peanut Butter packaging area had dusty blades and grill. A wrench and scraper were stored on a shelf over the processing line. Per the management, the white buckets are to be used for edible materials and red buckets for inedible materials. Observations indicate the white and red buckets are both used for trash and inedible materials.</p>	Minor*
7	<p><b>Personal Hygiene and Good Manufacturing Practices</b> There must be a dress code that is enforced for everyone entering the facility. Employees must wear clean clothing and shoes appropriate for the working conditions. Hair restraints must be worn in all processing and warehouse areas. Employees working in production areas must not wear fake fingernails, fingernail polish, jewelry, rings, or watches, etc. Employees cannot work in food processing areas if they have a communicable illness, or open sores. Employees must wash their hands before starting work and any time necessary to avoid product contamination. If gloves are worn, they must be intact, with no holes, and kept clean. There must be a means to avoid contamination of outer clothing when using the toilet facilities. Eating, drinking or using tobacco products must not be permitted except in designated areas.</p>	Acceptable
8	<p><b>RTE Sanitation and Corrective Action</b> Employees working in Ready to Eat (RTE) areas must take additional precautions to protect product from microbiological cross contamination. Personnel handling RTE food must wear sanitary gloves. Outer clothing in Ready-To-Eat processing areas is to be dedicated to that area. Note the conditions indicated in C.4.</p>	Minor*
9	<p><b>GMP Self Inspections and Corrective Actions</b> Internal GMP self-inspections must be conducted to verify compliance to policies and to evaluate the effectiveness of the policies. Follow-up audit activities must be conducted to record the effectiveness of corrective actions for deficiencies and repeat items.</p>	Acceptable
Section notes:		

### Section E Rodent and Pest Control Management

No	Question/Notes	Answer
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### Section E Rodent and Pest Control Management

No	Question/Notes	Answer
1	<b>Documented and Specific Pest Control Program</b> There must be a pest management program in place that is overseen by a licensed Pest Control Operator (PCO). Site maps for all traps and bait stations, documentation of services, Material Safety Data Sheet (MSDS), the PCO applicators license and letter of insurance must be current and on file. Non-certified personnel are applying pesticides (herbicide Round-Up / Honcho Plus).	Minor*
2	<b>Outside Premises Management (Grounds, Waste Disposal Areas)</b> The buildings exterior and grounds must be well maintained and free from pest harborages. Adequate trash and waste disposal facilities must be available and the premises must be free from standing water that could attract pests.	Acceptable
3	<b>Inside Premises Management</b> Interior conditions must be orderly, clean throughout and allow for easy access and evaluation along walls. Control measures must be used at distances from food or food contact surfaces to avoid any potential for contamination. Trapping devices must be in proper working condition and no bait stations can be used inside the plant or warehouse.	Acceptable
4	<b>Pest Tight Doors and Entrance Closures</b> All doors must be tight closing and no exterior holes/cracks in walls, pipe chase, vent openings, windows, etc., to provide easy access to pests. Dock doors (3 and 4) and personnel doors (SE corner of building and at Bulk Peanut Butter loading) did not have a good seal.	Minor*
5	<b>Secure Storage and Documentation of Pest Related Chemicals</b> If pest related chemicals are stored on site, they must be stored in a secured location with limited access. An up to date inventory log of chemicals must be maintained. Containers must be destroyed once empty. Safety precautions for storage of pest related chemicals must be available. There was a container of herbicide unsecured on an outside table.	Minor*
6	<b>Activity Reports Detailed with Corrective Actions</b> Activity reports must be available with specific details about all pest activity observed. Recommended corrective actions should be included on the reports as well as details about the chemicals used in response to the observed activity. Activity reports must be signed by the PCO and by a designated plant representative. All deficiencies require documented corrective action.	Acceptable
Section notes:		

### Section F Receiving and Inventory Control

No	Question/Notes	Answer
1	<b>Incoming Vehicle Review and Documentation</b> There must be a written inspection program that describes acceptable and/or unacceptable conditions for all inbound carriers. All inbound carriers must be inspected for food safety, quality and security related concerns at the time of receiving.	Acceptable
2	<b>Specific Receiving Policies with Inspection and Acceptance Plans</b> All ingredients and supplies must be purchased from approved vendors. Current specifications for purchased ingredients and supplies must be available. Incoming materials and ingredients must be inspected for damage, contamination and other unacceptable conditions as described by the receiving policy. Records must be maintained along with supplier codes for lot traceability.	Acceptable
3	<b>Release Criteria for Ingredients</b> All ingredients must be maintained in a secure fashion and released for use against a defined approval program. An inventory management system must be in place to assure proper rotation.	Acceptable
4	<b>Storage and Handling Policies and Practices</b> There must be established procedures to assure that ingredients and supplies do not become a source of contamination. Receiving areas and storage locations must be maintained in a clean and sanitary manner. All ingredients and supplies must be held under conditions necessary to maintain product integrity. Condensation from an air conditioner is draining to the floor of the secured ingredient area.	Minor*
5	<b>Bulk Receiving Systems Sanitation and Monitoring</b> Bulk ingredient handling and storage equipment must be maintained in a sanitary and secure manner. The cleaning procedures and frequencies must be documented.	Acceptable

### Section F Receiving and Inventory Control

No	Question/Notes	Answer
6	<b>Restricted and/or Sensitive Ingredient Control, Including Chemical Compounds</b> All restricted or sensitive ingredients, potentially toxic chemicals and allergenic materials must be maintained under strict control and stored separately to minimize the potential for accidental product contamination.	Acceptable

Section notes:

### Section G Process and Product Evaluation

No	Question/Notes	Answer
1	<b>Process Control and Documentation Procedures</b> There must be established process control procedures to assure products meets all food safety requirements. In-process ingredients and products must be adequately protected and properly labeled with date and lot number.	Acceptable
2	<b>Specification and Formulation Control and Accuracy</b> Records must be available that demonstrate compliance to product formulations and finished product specifications. Test protocols and frequencies must be followed as identified in the specification. Production records must be maintained for twelve months beyond product shelf life.	Acceptable
3	<b>Routine Calibration of Operational Equipment and Measuring Devices (such as thermometers, scales, flow meters, counters, metal detectors, etc.)</b> Key process control devices must be calibrated by an outside contractor at least annually. All devices must also be monitored internally at a frequency adequate to verify accuracy during day to day usage. Corrective actions must be documented when measuring devices are found to be out of calibration.	Acceptable
4	<b>Foreign Material Control</b> All finished product must be scanned through an instrument calibrated to identify and separate contaminated product. There must be a written procedure describing the maintenance, set-up and verification tests of detector systems with documentation to show the procedures are being followed. The cause for any rejection must be recorded on a calibration/test log.	Acceptable
5	<b>Application of Statistical Control</b> Statistical control must be used to determine the capability of the process equipment and the setting of critical limits for critical control points.	N/A
6	<b>Allergen and Sensitive Ingredient Controls</b> In facilities where allergens or sensitive ingredients are present, there must be detailed procedures to prevent the contamination of other products. Products containing allergens must be labeled as required by regulations.  A detailed documented allergen program for production and training is needed since there are different allergenic ingredients potentially used in addition to the primary peanut products.	Minor*
7	<b>Documentation Showing Product Meets Specifications</b> Records must be maintained to assure that the appropriate product attributes were evaluated and that the results were consistent over time.	Acceptable
8	<b>Rework and Carryover Products</b> There must be a documented procedure for managing rework and carry over products. Rework must be traceable to its original production and to finished product. Production dates and original lot numbers must be carried forward in production documents. Rework and carry-over must be kept to a minimum and used promptly at the first opportunity. There must be a routine and documented "clean break" in the rework/carryover cycle.	Acceptable
9	<b>Analytical Records Management</b> Established systems must be used to properly store and retrieve analytical information, documents, reports, records, etc.	Acceptable

Section notes:

### Section H Packaging and Labeling

No	Question/Notes	Answer
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### Section H Packaging and Labeling

No	Question/Notes	Answer
1	<b>Label Accuracy and Regulatory Compliance</b> There must be procedures in place to assure products are labeled properly and that the labels meet regulatory requirements.	Acceptable
2	<b>Documented Net Weight or Count Compliance Policy and Performance</b> Plants must have a documented policy for net weight, liquid contents or product count to verify compliance to label requirements and/or specifications.	Acceptable
3	<b>Clear Manufacturing Codes on Individual and Cased Product</b> All product must have a code date that is of such size, color and contrast to afford easy legibility at a reasonable distance. Each individual sell unit must have a production or lot code. Packages within the sell unit must have a lot code. The individual package code dates and the case codes dates must be the same.	Acceptable
4	<b>Package Integrity and Function for Distribution</b> All packaging must be designed and assembled to provide protection for the product from environmental and shipping conditions. Verification of proper sealing and closure of the packaging must be conducted.	Acceptable
5	<b>Label Security and Obsolete Label Controls</b> There must be a written plan in place to prevent the use of unauthorized or incorrect labels.	Acceptable
6	<b>Tamper Evident Packaging</b> Tamper evident packaging must be used and a documented monitoring program must be in place.	Acceptable

Section notes:

### Section I Storage and Shipping

No	Question/Notes	Answer
1	<b>Warehouse and Finished Product Management</b> Warehouse conditions must be maintained in a manner to assure product integrity. Finished product and packaging materials must be held separated and away from chemicals. Product not "cleared" for shipment must be clearly identified and stored in a location where it is not likely to be shipped in error.	Acceptable
2	<b>Retained and Returned Products</b> There must be documented procedures requiring identification, secured segregation, documentation, evaluation, disposition and reconciliation of non-conforming retained and returned products that is placed on hold. Returned products must be placed on hold immediately, designated areas must be established for retained and returned products and an inventory log must be maintained showing current product on hold and the disposition of all released product with proper authorization.	Acceptable
3	<b>Storage Facility and Dock Maintenance</b> Warehouse storage areas must be clean and orderly and have adequate space around the periphery for access, inspection and cleaning. Items must be stored off the floor, floors and walls must be in good condition and emergency doors must be tight fitting. Shipping docks, dock plates and levelers must be clean and kept orderly.	Acceptable
4	<b>Transport Condition</b> There must be written procedures for acceptable carrier conditions available to shipping personnel. Outbound trailers must be inspected and results must be documented. No product can be loaded into unacceptable carriers. When non-dedicated carriers are used, trailer logs must be assessed to determine if unacceptable materials had been present.	Acceptable
5	<b>Release Authorization to Ship Product</b> Release authorization must be required before any product is shipped.	Acceptable
6	<b>Product Traceability</b> Procedures must be established to effectively trace specific lots of ingredients, food contact packaging and finished products through the shipping and distribution channels. Traceability exercises must be conducted at least twice per year to the first level of distribution. Management assessments of each traceability exercise must be conducted. The most recent traceability exercise must demonstrated a 99.5% to 105% level of accountability within 4 hours.  During the audit, a traceability exercise was conducted on a by-product and its use in a Peanut Butter product. The exercise traced 100% of the resulting finished product in 5 minutes. An earlier tracing in January, 2008, was also successful in 2 hours and 15 minutes.	Acceptable

### Section I Storage and Shipping

No	Question/Notes	Answer
Section notes:		

### Section J Analytical Records and Laboratory Support

No	Question/Notes	Answer
1	<b>Laboratory Facility and Staffing</b> Laboratories must be adequately equipped and staffed to provide the essential technical support. Lab staff qualifications must be documented, toxic supplies must be securely stored and properly labeled and the laboratory must be clean, orderly and well lit.	Acceptable
2	<b>Laboratory Procedures and Documentation</b> Laboratory procedures must be documented, authorized and dated. Testing procedures must be based on recognized and approved procedures and documentation of all testing must be available.	Acceptable
3	<b>Laboratory Equipment Calibration</b> Calibration records must be maintained for all laboratory balances and test equipment for calibrations performed by a certifying company as well as all internal calibration check.	Acceptable
4	<b>Analytical Accuracy Verification</b> Documented evidence must be available that demonstrates laboratory test results are accurate and reliable.	Acceptable
Section notes: JL and Dibel Labs are used as contract labs for microbiological testing.		

### Section K Food Defense

No	Question/Notes	Answer
1	<b>Management</b> A risk assessment must be conducted by an established Food Defense team to evaluate all vulnerabilities and risks that exist in the facilities process. A documented Food Defense program must be in place. The facility must have a registration number from the applicable regulatory agency and unusual occurrences must be documented and assessed by management.	Acceptable
2	<b>Human Element</b> All individuals entering the facility must show proof of identification. A screening program must be in place for all employees. Temporary employees must be fully supervised at all times. Contractors and visitors must be required to show identification and sign in and out. Visitors must be accompanied while in the facility. A current roster of employees and work assignments must be maintained and employees must be prohibited from bringing personal items into processing areas. There must be a program in place to train Food Defense rules at the facility with documentation for each individual.	Acceptable
3	<b>Facility</b> Procedures must be in place to address access to and from the plant grounds and facility. A schematic of the facility and outside grounds must be available that identifies all entrances into the building, accesses to the roof and sensitive areas. Access to sensitive areas and utilities must be restricted. There must be a documented process for issuing, tracking and retrieving keys, identification badges and passes for the buildings and for secure areas.	Acceptable
4	<b>Operations</b> The facility must be evaluated for vulnerability to sabotage with documented procedures developed to address areas of concern. Non-employee drivers and delivery personnel must have a designated waiting areas. Trucks and/or trailers must be inspected before unloading. There must be a procedure for the receipt of damaged product. Vehicles must be kept secured when not in use and after loading is completed. Seal numbers must be recorded.	Acceptable
Section notes:		

### Section 2.A Awareness

No	Question/Notes	Answer
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### Section 2.A Awareness

No	Question/Notes	Answer
1	Product Security Review team designated by management with written responsibilities. A production team consisting of the Operations Manager, 4 department managers and the Quality Assurance Manager. In this small facility, this group, also acts as Product Security Team. Responsibilities need to be documented for each title or person in the Team.	Minor
2	Policies and procedures organized and maintained as controlled documents.	Acceptable
3	Team meets at least quarterly to review compliance to policies and procedures. Through daily staff meetings, the Team includes security issues on the agenda and logs the details the Production Managers log book.	Acceptable
4	All elements of process from ingredients through to finished product shipping have been evaluated for potential malicious product tampering.	Acceptable
5	Product Security program is effectively communicated to suppliers, customers and employees. Verification is documented. For employees there are training sessions, supplier contracts and customer surveys that include security information.	Acceptable
Section notes:		

### Section 3.A Employees, Contractors and Visitors

No	Question/Notes	Answer
1	Employee applications contain full personal, employment and legal history of applicant.	Acceptable
2	A current roster of employees is maintained, including their current work assignments.	Acceptable
3	All employees have a photo identification issued by the facility, and this ID is used to gain entrance. In this small facility, personal recognition is used as identification by managers and supervisors. Facility access is by key-coded doorways including the employee entrance.	NA
4	Critical processing areas with respect to product security have been identified, and access is limited to designated employees. Critical areas such as minor ingredients and sanitation chemicals are accessed by designated employees.	Acceptable
5	Personal items and/or containers are not brought into the operating areas by employees.	Acceptable
6	The plant has an employee termination process which includes immediate escort from the facility and the accounting for plant issued Identification, keys, etc.	Acceptable
7	The plant has a documented process for managing Product Security issues with temporary employees in the same manner as with permanent employees. A hiring is conducted through a temporary agency for background and drug testing as well as a probationary period. Orientation and periodic training is provided to all temporary and full time employees.	Acceptable
8	Plant has a documented policy for management of contractors, which includes method to ID contractor's employees, and a sign-in log. Contractors receive the same training as employees in addition to sign in and are escorted	Acceptable
9	Contractors have an ID badge or other designation and are signed in and out of the plant. Contractors are escorted while in the facility..	Acceptable
10	Tool boxes and other containers undergo inspection as contractors enter the plant each day. No toolbox or containers are inspected.	Unacceptable
11	The plant has a documented process for managing all visitors, which includes verification of ID and a sign-in process. There is sign in process for all visitors with escort. No ID verification was conducted for the auditor.	Minor
12	Visitors are always accompanied by a designated plant employee.	Acceptable
13	Visitor vehicles are subject to inspection. License information is logged. Visitor vehicles do not enter the fenced area of the physical building.	NA

### Section 3.A Employees, Contractors and Visitors

No	Question/Notes	Answer
14	There is documented evidence the visitor log is reviewed each day to insure all visitors have signed out. This is inconsistent since there are few visitors.	Minor
15	Plant has documented training elements focusing on security guidelines, suspicious activities and criminal consequences.	Acceptable
Section notes:		

### Section 4.A Plant Security Measures

No	Question/Notes	Answer
1	Policies address authorized access to grounds, plant, manufacturing and storage areas. A Bio-Security and visitor policy are in effect.	Acceptable
2	All entrances have individual authorization controls--electronic or by individual ID. All entrances to the building are key coded with limited employee authority. Key codes are changed each month.	Acceptable
3	The plant must have a documented process for issuing keys for the building and for secure areas: - Secure key system that is resistant to unauthorized copying of keys - Complete listing of all issued keys - Process for changing all keyed systems as needed. An issuance of numbered keys is documented.	Acceptable
4	All employees have photo ID badge. Personal recognition is used for employee entry so no badges are issued.	NA
5	Photo ID badges have electronic scan strips to control access to specific areas of facility and document arrival and departure. Personal recognition is used for employee entry so no badges are issued.	NA
6	Emergency exits are alarmed and verified.	Acceptable
7	Employees access is restricted to assigned areas of the plant.	Acceptable
8	Water source, private or municipal is securely protected and access strictly controlled.	Acceptable
9	Spice & condiment weighing and batching area secured and access controlled.	Acceptable
10	Bulk mixing & storage areas secured.	Acceptable
11	Evening, weekend, holiday security for ingredient. areas.	Acceptable
12	TV monitoring or controlled access of minimally supervised areas.	Acceptable
13	Plant grounds are fenced and provide perimeter security.	Acceptable
14	Outside facility and grounds are illuminated.	Acceptable
Section notes:		

### Section 5.A Ingredient Safety

No	Question/Notes	Answer
1	Plant must have a documented supplier management procedure which addresses issues of Product Security.	Acceptable
2	Plant is aware of significant changes with ingredient suppliers, including change of management, ownership, labor disputes, etc.	Acceptable
3	Shipping trailers, bulk trailers/cars or containers are sealed, and the plant documents seal numbers and compares the numbers to supplier shipping manifests.	Acceptable
4	Bulk shipping containers have records of previous hauls, cleaning and inspections.	Acceptable
5	Incoming shipping vehicles are thoroughly inspected, and this inspection is documented by the plant.	Acceptable

### Section 5.A Ingredient Safety

No	Question/Notes	Answer
6	Incoming goods undergo inspection to assure general wholesomeness and packaging integrity.	Acceptable
7	The plant has a policy that addresses the handling of ingredients or packaging materials that have damaged packaging.	Acceptable
8	Lot identification procedures are followed.	Acceptable
9	There are separate storage areas for food and non-food items.	Acceptable
10	Bulk tanks are secured by locked hatches or rooms.	Acceptable
11	Packaging storage areas are controlled and secured.	Acceptable
12	Labeling security controls to prevent unauthorized usage of labels and procedures for timely isolation and destruction of obsolete labels. Labels are produced as needed at the production line.	Acceptable
13	Access to storage areas is limited to authorized personnel.	Acceptable
14	The plant has a procedure for managing damaged or returned ingredients or packaging, or for damaged Work-in-Process.	Acceptable
15	No opened ingredients are stored in warehouse areas. Ingredient packages that are opened are placed in closed top plastic containers for additional holding in a secured area of the warehouse.	Acceptable
16	Policy to address risk of imported ingredients.	Acceptable
Section notes:		

### Section 6.A Utilities

No	Question/Notes	Answer
1	Water is tested annually at a minimum for chemical and microbiological potability. The water source is municipal and water test results are provided.	Acceptable
2	Plant wells are secured by a locked building or wellhead. The water source is municipal.	NA
3	Water storage tanks are locked. No water storage tanks are used.	NA
4	Plant water filters are cleaned and inspected regularly and are securely protected. The water source is municipal.	NA
5	Water is evaluated routinely for pH and Cl and unusual observations of water quality are documented. The water source is municipal.	NA
6	Plant chlorination of water is monitored. Chlorinating equipment is secured. The water source is municipal. There is no plant chlorination of water.	NA
7	Filter houses for incoming environmental air are locked, and are serviced and inspected periodically.	Acceptable
8	Air intakes, air distribution systems and ducting are inspected periodically.	Acceptable
9	Product contact high pressure plant air systems are equipped with a 0.5 micron filter at point of use. No high pressure or HVAC air system is used.	NA
10	MSDS are available for all chemicals used for water and boiler treatment. No boiler is used at this facility.	NA
11	Chemical levels in boiler water are monitored. No boiler is used at this facility.	NA
12	Boiler additives are on the approved list (NSF). No boiler is used at this facility.	NA

### Section 6.A Utilities

No	Question/Notes	Answer
13	Chemicals and containers for boiler chemicals are secured. No boiler is used at this facility.	NA

Section notes:

### Section 7.A In-Plant Hazardous Materials

No	Question/Notes	Answer
1	The laboratory maintains a current inventory of all laboratory chemicals and solvents. Only physical testing is conducting with no chemicals involved.	NA
2	MSDS are available for all laboratory chemicals. Only physical testing is conducting with no chemicals involved.	NA
3	All stored laboratory chemicals are secured. Only physical testing is conducting with no chemicals involved.	NA
4	Access to the laboratory is restricted to authorized personnel.	Acceptable
5	Culture wastes from the microbiological laboratory are autoclaved. No microbiological testing is conducted at this facility.	NA
6	Glass containers are not allowed on the factory floor.	Acceptable
7	The laboratory has a procedure for controlling broken glass. The laboratory uses a disposable plastic dish for peanut butter testing in the lab. These dishes are enclosed in packaging when entering the lab for use or leaving the lab after usage.	Acceptable
8	Mercury-in-glass thermometers are inventoried, and kept inside the laboratory. No mercury-in-glass thermometers are inside the plant. or laboratory.	NA
9	Cleaning chemicals are stored in locked areas, and inventories are maintained.	Acceptable
10	MSDS are maintained for cleaning janitorial chemicals.	Acceptable
11	CIP systems are isolated from production piping during plant operations. No CIP system exists at the facility.	NA
12	Lubricants should have approval for incidental contacts with food. (NSF Listing)	Acceptable
13	MSDS are maintained for all maintenance chemicals and solvents.	Acceptable
14	Scrap in the maintenance shop is regularly discarded.	Acceptable
15	Access to the maintenance shop is restricted to authorized personnel.	Acceptable
16	Pest control chemicals are either stored off-site by a contracted PCO, or stored in a locked, isolated room if managed by in-house PCO's.	Acceptable
17	Rodenticides or pesticides are not used in plant operating areas.	Acceptable
18	Exterior bait stations are secured to the ground or wall, and are locked or sealed.	Acceptable
19	Trapped pests are immediately disposed.	Acceptable
20	MSDS are maintained for pest control chemicals.	Acceptable
21	A plant employee accompanies the contracted PCO on their rounds.	Acceptable

Section notes:

### Section 8.A Process Security

No	Question/Notes	Answer
1	Computer security programs for processing controls, formulation and ingredient management. No computer system is used for process control or formulation or ingredient management.	NA
2	Only the ingredients in the product recipe should be staged in the blending area.	Acceptable
3	Containers, implements and tools shall be clean before the start of operations.	Acceptable
4	All ingredients are properly identified.	Acceptable

### Section 8.A Process Security

No	Question/Notes	Answer
5	Small tools, such as scoops, scrapers, knives, etc. shall be inventoried and accounted for at the end of the shift. No documentation is established as to small tool accountability.	Minor
6	Sifters and in-line screens should be used for all applicable granular or liquid ingredients. This equipment is used during batch preparation.	Acceptable
7	Equipment, such as dicers, grinders, mixers, etc. shall be inspected for condition, and this inspection documented, prior to use and after use. This is part of the Pre-Op inspection at the beginning of each shift.	Acceptable
8	All unusual events during the production shift are documented. Events are noted in the plant manager's log.	Acceptable
9	The spice and condiment preparation area should be secure with access restricted to assigned employees. This area should be locked when not attended. Seasoning are kept locked until use in the secured ingredient area with only limited key issuance.	Acceptable
10	All formulated spice mixes shall be identified.	Acceptable
11	Screens shall be used to sieve spice ingredients where appropriate.	Acceptable
12	All unusual events in the spice preparatory area during the production shift are documented. Events are noted in the plant manager's log.	Acceptable
13	Storage tanks in the production area must have lids, and must be inspected before use.	Acceptable
14	CIP systems on tanks must be disconnected prior to production. No CIP systems are used at this facility.	NA
15	Storage tanks in remote locations should be alarmed and/or locked. No storage bins or tanks are in remote locations.	NA
16	In the filling and packaging areas, metal detectors, magnets, screens/sieves should be applied as appropriate. Both magnets and metal detectors are used in the process as appropriate.	Acceptable
17	Pumps, conveyors and filling/depositing/packaging equipment must be inspected prior to use and at the end of the shift, and this inspection documented. Equipment checks are conducted each shift.	Acceptable
18	All unusual events in the filling area during the production shift are documented. Events are noted in the plant manager's log.	Acceptable
19	Empty containers should be effectively cleaned and protected by covers during transit to filling and prior to closing.	Acceptable
20	In the processing, freezing, drying, cooking, pasteurizing step, the registered process is posted at the processing step controls. There are no registered processes.	NA
21	Authorized operators are identified by license, certification or other plant designation. There are no registered processes for operator license or certification.	NA
22	Production processing records must be reviewed by responsible management at the prescribed frequency.	Acceptable
23	Controllers for critical process factors must be locked. These are located in locked cabinets with key codes locks for limited access.	Acceptable
24	Critical instruments must be calibrated at the designated frequency.	Acceptable
25	Post processing controls must be identified in plant procedures.	Acceptable
26	Controls must be in place to prevent unauthorized switching or change of processing systems.	Acceptable
27	Labeling controls must effectively prevent the mis-labeling of products. Labels are applied as printed on the production line.	Acceptable
28	All unusual events in the processing area during the production shift must be documented. Events are noted in the plant manager's log.	Acceptable

### Section 8.A Process Security

No	Question/Notes	Answer
29	Documented control of rework, carry-over ingredients and product must be available.	Acceptable
Section notes:		

### Section 9.A Warehouse and Transportation

No	Question/Notes	Answer
1	Clear policy defining authorized access to warehouse Clear policy defining authorized access to warehouse for ingredients & finished product.	Acceptable
2	Non-employees (truck drivers) limited to office or designated area only. No access to warehouse or plant. Drivers only enter with escort.	Acceptable
3	Clear policy defining acceptable condition of ingredient packaging and integrity.	Acceptable
4	No damaged containers accepted if product is exposed to contamination.	Acceptable
5	Policy addressing damage to ingredients after receiving-- must be handled immediately.	Acceptable
6	Product not in original unopened package should not be stored in warehouse.	Acceptable
7	Returns, rework & withheld clearly marked in designated area. Individual pallets clearly marked.	Acceptable
8	Weekly accounting for all returns, rework & withheld. This is conducted daily.	Acceptable
9	Transport evaluated for condition	Acceptable
10	Transport evaluated for temperature maintenance. Most products are shipped in ambient conditions. Temperature conditions are evaluated per customer requests.	Acceptable
11	Procedures for transport companies covering driver ID, changes, stops, seal authentication, breakdowns and recognizing and reporting suspicious activities.	Acceptable
12	Documented procedures for maintaining equivalent security at all outside warehouse facilities. No documented procedures have been established.	Unacceptable
Section notes:		

### Section 10.A Traceability

No	Question/Notes	Answer
1	All ingredients assigned individual lot numbers with vendor lot or batch numbers identified.	Acceptable
2	Bulk ingredients traceable by lot with no commingling of lots.	Acceptable
3	Packaging lot numbers documented for each lot.	Acceptable
4	Individual container units clearly identified with lot numbers and time or sequence.	Acceptable
5	Shipping case units clearly identified with lot numbers and time or sequence.	Acceptable
6	Damaged, destroyed, reworked or sample cases of finished product documented.	Acceptable
7	Daily accounting and balance of cases produced vs. cases to warehouse, destroyed, reworked, withheld or sampled.	Acceptable
8	Inclusion of records of production irregularities or unusual events (glass breakage).	Acceptable
9	Mock recalls through distribution system semi-annually.	Acceptable
Section notes:		

### Section 11.A Tamper Evident Packaging

No	Question/Notes	Answer
1	Risk assessment document addressing product and it's packaging. This is conducted when packaging changes are contemplated.	Acceptable

### Section 11.A Tamper Evident Packaging

No	Question/Notes	Answer
2	If used, effective monitoring programs in place to assure proper application. This is verified by QA personnel.	Acceptable
3	Tamper evident review of ingredient packaging and containers-- bulk materials, drums, pallets. During receiving, the packaging is reviewed with rejection of torn or opened containers.	Acceptable
Section notes:		

### Section 12.A Crisis Management

No	Question/Notes	Answer
1	Crisis Management team identified with responsibility in writing. This exists as the Recall Team for which responsibilities are defined.	Acceptable
2	Crisis management procedures cover food security, recalls, emergency and disaster possibilities For areas other than recalls, procedures need to be developed.	Minor
3	Team members have specific training and protocol procedures to address each crisis. For areas other than recalls, training needs to be conducted.	Minor
4	Crisis management policies and procedures reviewed with team members semi-annually. For areas other than recalls, reviews need to be conducted.	Minor
5	Current contact lists for all team members, regulatory contacts, clients, suppliers, corporate & other key. As per the Recall procedures.	Acceptable
6	Current contact list available to responsible personnel on all shifts, weekends & holidays.	Acceptable
7	Recall plan tested to assure 99.5 % recovery within 4 hours quarterly. During the audit, a traceability exercise was conducted on a by-product and its use in a Peanut Butter product. The exercise traced 100% of the resulting finished product in 5 minutes. An earlier tracing in January, 2008, was also successful in 2 hours and 15 minutes.	Acceptable
8	Plan to isolate and remove potentially compromised material and restore security to manufacturing process to facilitate timely return to safe production of wholesome product.	Acceptable
9	Plan requires review by QA or food safety group prior to resumption of activities following incident.	Acceptable
Section notes:		

### Section 1.A Ingredients of Concern

No	Question/Notes	Answer
1	Does the plant use or store Peanuts or Peanut Products?	Yes
2	Does the plant use or store Tree Nuts?	Yes
3	Does the plant use or store Crustacea?	No
4	Does the plant use or store Fish?	No
5	Does the plant use or store Egg or Egg Products?	No
6	Does the plant use or store Milk or Milk Products? Ranch flavor, Nacho Cheese flavor	Yes
7	Does the plant use or store Soybean or Soy Products? Soy Oil	Yes
8	Does the plant use or store Wheat, Corn (Maize) or Related Grains?	No
9	Does the plant use or store Mollusks?	No
10	Does the plant use or store Seeds?	No

**Section 1.A Ingredients of Concern**

No	Question/Notes	Answer
11	Does the plant use or store Cottonseed Products? Cottonseed Oil	Yes
12	Does the plant use or store Legumes?	No
13	Does the plant use or store Sulfites?	No
14	Does the plant use or store FD&C Yellow #5 or #6?	No
15	Does the plant use or store Monosodium Glutamate, Autolyzed yeast, Hydrolyzed protein? Spice contains Torula yeast	Yes
16	Does the plant use or store Meat?	No
17	Does the plant use or store Poultry?	No
Section notes:		

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If you have any questions about this report, please contact your NSF Project Manager, Betty Teasdale, at 734-913-5767 or bteasdale@nsf.org.