



FOOD SAFETY AUDIT REPORT

DRAFT REPORT

#12352

Bender Warehouse Co.
345 Parr Circle
Reno, NV 89512

By

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Food Safety Auditor

August 9, 2006

AIB International

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RATING

A food safety audit was conducted at this distribution facility on August 9, 2006.

The writer was accompanied throughout the audit by Mr. David Hulsizer, Assistant Manager of Operations.

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 with Mr. David Hulsizer, Assistant Manager of Operations to discuss the observations, recommendations, and rating.

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

SUPERIOR

(975)

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.

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RATING ANALYSIS

DATE OF AUDIT: August 9, 2006

TYPE OF AUDIT: Announced

OVERALL RATING: **SUPERIOR**

ADEQUACY OF FOOD SAFETY PROGRAM 195

PEST CONTROL 195

OPERATIONAL METHODS AND PERSONNEL PRACTICES 200

MAINTENANCE FOR FOOD SAFETY 195

CLEANING PRACTICES 190

TOTAL: 975

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FACTUAL OBSERVATIONS AND SPECIFIC RECOMMENDATIONS

ADEQUACY OF FOOD SAFETY PROGRAM

1. A current organizational chart 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.
2. The department responsible for maintaining the distribution center's food safety program had established written procedures outlining the specific responsibilities of each department manager and employee in a procedure or operations manual. This manual included a statement defining the company's intention to meet its obligations to keep the products safe.
3. This facility had established a multidisciplinary food safety committee to conduct monthly inspections (July 6, 2006 and August 3, 2006) of the entire distribution center. Documentation of monthly inspections included identified deficiencies, specific assignments, and actual accomplishments. Follow-up inspections were done to ensure that the items were corrected. It was recommended that the facility continues to train the food safety committee ability to identify food safety issues, develop corrective plans to eliminate the food safety issue.
4. 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. A daily housekeeping schedule and a Master Cleaning Schedule (MCS) for periodic cleaning assignments were developed as a formalized, written plan and carried out 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 warehouse 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.
6. Detailed, written cleaning procedures were developed and on file for all cleaning tasks in the facility relating to the cleaning of food storage equipment, the building, and the exterior grounds. The facility has cleaning procedures for the cleaning of overhead doors and racks.

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7. All incoming material entering the facility was inspected for objectionable material according to a written procedure. This procedure included a visual inspection for pests, damage, cleanliness, and product integrity. In addition, receiving records were maintained that included the date of receipt, carrier, quantity, and information to ease a recall. Seal numbers were recorded when applicable.
8. This distribution center did not handle any fresh or frozen seafood items and, therefore, was not required to maintain a Hazard Analysis Critical Control Point (HACCP) Program. As a matter of good practice, rather than regulation, it was suggested that a hazard analysis be conducted to determine if there were any critical control points and to ensure that all potential hazards were controlled. If hazards were found the program would include the following components:
Description of the products manufactured and hazards inherent to them;
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; and Documentation of procedures, records of conformance, and corrective actions.
9. The company had established written employee guidelines and food safety policies. Specific written procedures were on file for providing food safety training to all employees, including temporary workers and contractor. Records of training completion for new employees and annual refresher training (July 10, 2006) documentation were maintained for all workers.
10. Customer complaints were addressed through the Process Improvement Program. A form for documenting the investigation and root cause was available. No complaints related to product safety had been made.
11. A written recall program was on file and routinely reviewed. Distribution records were maintained to identify the initial point of distribution to ease segregation and recall of specific lots. While performing the survey, a test trace and mock recall was conducted on product 41609, code 200551110 in which 100% was accounted for in approximately five minutes. It was recommended that test traces and mock recalls be conducted every six months with appropriate documentation maintained on file.

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12. Written procedures were in place to control damaged and held product. Damaged product was disposed of and inventory adjustments were made. The disposition of held product was determined by the suppliers of the product.
13. 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. Approval for records and samples was made through the suppliers of the products in question.
14. A written policy stating that glass was not to be used in the facility, unless it must be 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.
15. Preventive maintenance for forklifts and the HVAC in the temperature-controlled room were contracted to outside sources. An internal work order system was in place for work that the company's mechanic could address. A program to ensure that the safety of the product was not jeopardized during maintenance operations was implemented at this facility.

PEST CONTROL

16. 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.
17. Facility management contracted the Pest Master Services Company to provide monthly pest control services. A copy of the service agreement that included materials to be used, methods, and precautions was maintained on file. Copies of the current liability insurance that expires 12/31/06 and current applicator's license that expires 12/31/2006 were maintained on file.
18. Material Safety Data Sheet(s) (MSDS) and sample labels were maintained on file for all pesticides applied on the premises. The following pesticides used during the past year were: Suspend SC (EPA number 432-763), Generation (EPA number 7173-218), Tempo (EPA number 3125-380), and Phantom (EPA 214-392).

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19. 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.
20. 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 showed that the applications were made in accordance with the label directions.
21. A schematic (November 17, 2001 for rodent traps and July 17, 2006 for bait stations) depicting the locations of the interior and exterior pest control devices, including mechanical rodent traps, glue boards, pheromone lures, and bait stations, was maintained on file and appeared current.
22. 110 mechanical Tin-cat 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 (August 7, 2006; July 31, 2006) by company employees and monthly by the PCO (July 14, 2006), and a record was maintained of service and cleaning of each rodent control device. A rodent activity log was used to record captures and help direct any necessary corrective actions. The traps randomly examined appeared properly maintained.
23. 47 protecta bait stations for rodent control was 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. The service and results of the checks were documented on July 14, 2006. It was observed the block in some of the traps were not fresh and it was recommended that these be replaced to ensure that any feeding occurs at the bait stations to facilitate the pest control program.
24. 103 pheromone lures or traps (red flour beetle, warehouse beetle, and Indian Meal Moths) were used in this facility as a means of monitoring insect activity. These traps were checked regularly, and records were maintained of the findings.
25. No evidence of insect, rodent, or bird activity was noted in or around the facility.

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OPERATIONAL METHODS AND PERSONNEL PRACTICES

26. Damaged or soiled materials and any materials shipped in dirty or infested trailers or containers were rejected at the time of receipt.
27. Eighteen-inch perimeters were maintained in all storage areas to provide cleaning and inspection access. Adequate space for cleaning was maintained amid rows of stored products.
28. Pallet racking was used to maintain storage conditions. Each pallet of merchandise was identified with the appropriate information to ensure "first-in, first-out" rotation.
29. Any toxic chemicals, including the cleaning solutions, maintenance compounds, and non-food-related materials, were completely segregated from all food ingredients and packaging materials.
30. Rubbish and waste materials were properly stored outside the facility in a suitable dumpster, which was emptied as necessary. The area was generally well maintained and free of excessive spillage.
31. The washrooms were maintained in an acceptable sanitary condition. The lockers were inspected monthly as a sanitary control, and no open food or drink was allowed. "Wash Hands" signs were displayed in the rest rooms, lunchroom, and smoking areas.
32. Shipping vehicles were inspected before loading for cleanliness and structural defects that could jeopardize product integrity. Issues that were found were documented.
33. All employees observed during the survey appeared to be practicing good individual hygiene habits. Eating, drinking, and smoking were restricted to designated areas.

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MAINTENANCE FOR FOOD SAFETY

34. The site was maintained and located to prevent contamination and enable the storage of safe and legal products. Site security strategies included controlled parking, locked doors, employee screening, and a visitor policy and visitor registration.
35. The exterior grounds were maintained in a manner that prevented pest harborage. Litter and waste were not evident and weed growth was controlled. The south side was asphalt with rail line on the backside. The other two sides were gravel and were properly maintained to prevent pest harborage.
36. The building was appropriate in size and layout to ease the maintenance and sanitary operation for food storage.
37. The floors, walls, and ceilings (throughout the plant) were of sound construction and well maintained. No roof leakage was evident.
38. Adequate lighting was provided in all areas. Overhead lighting was not shatter shielded to protect against accidental breakage, but it was located at heights that were out of range for the lift trucks. In addition, the integrity of all bulbs was checked monthly glass audits.
39. Overhead door for forklifts out of 15 doors had been damaged and had a gap greater than ¼". It was recommended that the facility repair the dock door to prevent pest egress in to facility.

CLEANING PRACTICES

40. Adequate cleaning equipment and tools were available and stored away from the production areas.
41. The overhead areas were cleaned frequently enough to prevent insects or filth from contaminating the food products in storage.

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42. Dock levelers number nine and ten had dog food pellets and plastic wrap on dock levelers on the east side was observed. It was recommended that the dock levelers be cleaned regularly to prevent excessive soil, litter accumulations and Pest harborage. It was recommended that these be added to the MCS schedule to ensure cleaning on a given frequency.
43. The pallet racks and storage shelves were cleaned frequently enough to remove spillage and dirt buildups and prevent pest development.
44. The floor areas were cleaned on a regular schedule to eliminate food residues and maintain a good cosmetic appearance.
45. The painted white perimeters were cleaned and mopped at least monthly or more often, if necessary, to maintain a good appearance.
46. The facility grounds were well maintained and free of miscellaneous trash and debris.
47. The trash dumpster area was maintained in an acceptable sanitary condition.