



FOOD SAFETY AUDIT REPORT

#6951-A

Sun Glo of Idaho, Inc.
378 S. 7th Avenue
Sugar City, ID 83448-0300

TYPE OF AUDIT

ANNOUNCED

INSPECTION DATE

April 13, 2011

AIB International Inc.

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RATING

A food safety audit was conducted at this facility on April 13, 2011.

The writer was accompanied throughout the audit by Mr. Curtis Parkinson, Plant Manager; Ms. Melissa Coles, Human Resources Manager.

At the conclusion of the audit, a meeting was held to discuss the observations, recommendations, and rating.

Based on the observations made, the information obtained, and the criteria set forth in the *AIB International Consolidated Standards for Inspection: Fresh Produce & Fruit Packinghouses*, the overall food safety level of this facility was considered to be:

**SUPERIOR
(940)**

The "Serious" or "Unsatisfactory" items are shaded, boxed, and bolded in the text of the report. Refer to the definitions in the AIB International Consolidated Standards for Inspection.

The "Improvement Needed" items are designated in bold type and require prompt attention.

AIB International Inc. states that this report as dated and provided herein is to be construed as its findings and recommendations, category scores, total score, and rating. A passing score of 700 and above is not a certification of the facility, products or programs. AIB International Inc. does not accept or assume responsibility for the Prerequisite and Food Safety Programs in effect with (customer). AIB International Inc. is only reporting the food safety conditions of (customer) as of the date of this report and assumes no responsibility or liability as to whether (customer) does or does not carry out the recommendations as contained in this report.

RATING ANALYSIS

DATE OF INSPECTION: April 13, 2011

TYPE OF INSPECTION: Announced

OVERALL RATING: **SUPERIOR**

OPERATIONAL METHODS AND PERSONNEL PRACTICES	195
MAINTENANCE FOR FOOD SAFETY	170
CLEANING PRACTICES	200
INTEGRATED PEST MANAGEMENT	200
ADEQUACY OF PREREQUISITE AND FOOD SAFETY PROGRAMS	<u>175</u>
TOTAL:	940

FACTUAL OBSERVATIONS AND SPECIFIC RECOMMENDATIONS

OPERATIONAL METHODS AND PERSONNEL PRACTICES

1. 1.1.0.0 Transports/containers and raw materials were inspected upon receipt for cleanliness, pest activity, structural defects, or other issues that could jeopardize product integrity. Inspection documentation, including rejected shipments, was maintained. A SOP was in place stating the measures to be taken in the case of product contamination by chemicals, petroleum, pesticides and other contaminants. Produce was received in accordance with USDA guidelines. The potatoes were inspected under the guidelines of the in house USDA inspector. Documentation indicated that produce was received in accordance with specified conditions.
2. 1.2.0.0 Food products were stored and removed from storage to prevent product contamination. Materials were stored off the floor and 18 inches (45 cm) away from the wall to facilitate cleaning, inspection and pest control activities.
3. 1.3.0.0 Storage areas were clean, well ventilated and dry. Materials in storage were protected against contamination. Packaging materials, toxic chemicals, and non-product materials were segregated.
4. 1.4.0.0 Ingredients, packaging supplies, and other materials were rotated on a "First-In, First-Out" basis or other verifiable method to ensure stock rotation. The scale ticket was used to identify lot numbers to facilitate stock rotation.
5. 1.5.0.0 Pallets and produce bins were clean, dry and in good repair. Slip sheets were used by customer request. Plastic bins were not used.
6. 1.6.0.0 A designated rework area was provided to segregate rework materials. The facility had a written policy that defined how contaminated product was reconditioned or disposed of after coming in contact with the floor or other surfaces. Rework was processed on a daily basis to prevent product build up.
7. 1.7.0.0 Release procedures were defined for the raw materials, work-in-progress and/or finished products produced at this facility. Materials were released by authorized personnel, USDA and CAP inspectors.
8. 1.10.0.0 Sampling of incoming raw materials for testing was conducted at this facility. Procedures were in place to ensure compliance to grade standards. Procedures were in place and followed for sampling and testing raw materials to meet the USDA guidelines.

9. 1.11.0.0 Food approval documentation was on file for processing aids. This facility used a sprout nip chemical, Biox and Shield 3EC; and Paraclean and Chlorine acutabs, for water sanitizing. These materials were segregated from non food-grade materials in storage.
10. 1.12.0.0 Procedures were provided for transferring and handling food materials. Containers were stored off the ground, in good condition, identified. There was no evidence of personnel walking, stepping or lying on produce or packaging materials. Containers used for product were only used for this designated purpose.
11. 1.15.0.0 Rock traps and visual inspection devices were used for foreign material control. A Preventive Maintenance (PM) Program was in place to inspect and maintain foreign material control devices. PM records were current.
12. 1.16.0.0 Trash or inedible waste was stored in properly identified and covered containers. Waste was removed by a licensed contractor. However, it was observed that fifty-five gallon drums were used outside the building as trash containers, but did not have lids to prevent the attraction of pests. It was recommended that the outside trash containers be equipped with lids. (MINOR ISSUE)
13. 1.18.0.0 Carry-over produce was not stored at this facility.
14. 1.19.0.0 Housekeeping activities were ongoing throughout the hours of operation in production, raw material, and support areas to maintain a sanitary working environment. Production equipment and supplies were neatly arranged. Space and storage were adequate. Portable or infrequently used equipment was not stored in production areas.
15. 1.20.0.0 Single-service containers were not reused at this facility.
16. 1.22.0.0 Materials, work-in-progress, and finished products capable of supporting the rapid growth of undesirable microorganisms were not stored at this facility.
17. 1.23.0.0 Incompatible materials were stored under conditions that prevented cross contamination. No iced product, and no allergens were stored in this facility.

18. 1.26.0.0 All shipping vehicles were inspected prior to loading for cleanliness and structural defects that could jeopardize product integrity. Inspection documentation was maintained and included lot code designation, amounts, and the point of distribution to ensure traceability and recall. Security seals were provided and documented for outbound materials. Temperature documentation was provided for quality issues only. Trailers were pre-cooled to 42°F or to the customer's specified temperature.
19. 1.27.0.0 Adequate hand washing stations were located at appropriate locations and were stocked with single-use towels. "Wash hands" signs were displayed by sinks and entries into production areas.
20. 1.28.0.0 Washrooms and lockers were maintained in an acceptable sanitary condition. "Wash hands" signs were displayed in restrooms, lunchrooms, and smoking areas. Lockers were inspected on a defined monthly frequency and no open food or drink was allowed.
21. 1.29.0.0 Trained supervisors were in place to monitor compliance to personnel practices. Personnel were observed washing hands appropriately and good personal hygiene practices were observed. Hand washing procedures were monitored periodically for effectiveness.
22. 1.30.0.0 Personnel in the facility were wearing adequate hair and beard restraints in compliance with the written policy. Employees were required to have the hair pulled back away from the face. Their clothing and uniforms were clean and well maintained. Tools were stored below the waist to prevent product contamination issues.
23. 1.32.0.0 Loose or insecure jewelry was not observed. Personnel were not observed eating, drinking or smoking in unauthorized areas. Personnel property was stored in appropriate locations defined by company policy. No glass or ceramic items were observed in operational areas.
24. 1.33.0.0 Effective procedures were in place to ensure that personnel with boils, sores, infected wounds, infections or other communicable diseases were not permitted to come in contact with food as required by law. Cuts and grazes were covered by bandages and gloves. There was documented supervisor training regarding signs and symptoms of infectious disease, in the CPR and First Aid training that was presented by the American Red Cross. Clean first aid supplies were provided.
25. 1.34.0.0 All non-facility personnel, including visitors and contractors, followed the facility personnel practices requirements. Appropriate training was provided prior to entry into the manufacturing and storage areas.

- 26. 1.44.0.0 Chemicals including sanitizing agents were used according to label directions. Documentation of monitoring indicated compliance to label requirements. No regulated chemicals were used at this facility.
- 27. 1.45.0.0 Recycled process water was not used at this facility, only fresh water was used.

MAINTENANCE FOR FOOD SAFETY

- 28. 2.1.0.0 Facility boundaries were defined and controlled. Measures were in place to prevent contamination from local activities or neighboring properties that could impact the facility. The facility was located in a rural agricultural setting.
- 29. 2.2.0.0 Outside grounds were maintained in a way that prevents product contamination. Measures included, but were not limited to, managing drainage, litter, weeds, and dust and maintaining waste and equipment graveyards to eliminate pest attraction to the facility.
- 30. 2.3.0.0 Some measures were taken to maintain facility security. Security strategies included locked doors, limited access to sensitive areas, surveillance cameras, controlled bulk storage areas, truck seals, employee screening, awareness and training programs.
- 31. 2.4.0.0 Adequate space was observed between equipment and structures to facilitate access for cleaning and maintenance activities.
- 32. 2.5.0.0 Floors, walls, and ceilings throughout the facility were well constructed and maintained. Floor drainage was designed and maintained to allow access for cleaning and to prevent product contamination. There was no evidence of roof leakage.
- 33. 2.6.0.0 **Fixtures, ducts, and pipes were properly installed and maintained to prevent contamination from leaks, condensation, or loose material. There was no evidence of loose materials such as insulation, flaking rust, and paint in the overheads or from production equipment in or above the product zone. However, peeling paint was observed over the product zones at the discharge end of the Baby-B bins. Peeling paint can be a potential source of foreign material contamination. A recommendation was offered that the peeling paint be removed, and the PM program be reviewed to address peeling paint in the facility. (IMPROVEMENT NEEDED)**

34. 2.7.0.0 Fluorescent light tubes, light bulbs, essential glass, brittle plastics, and ceramics in the facility were of the safety type or otherwise protected from accidental breakage. Those that could not be protected were accounted for in the Glass, Brittle Plastics, and Ceramics Program. Lighting levels were adequate.
35. 2.9.0.0 Adequate barriers were in place to prevent rodents, insects, and birds from entering the facility. Cracks, crevices, and other pest harborages were eliminated and doors were pest-proofed to prevent pest entry.
36. 2.10.0.0 **There was no evidence of leaks or excessive lubrication in product zones where contamination was likely. In areas where drive motors or gearboxes were mounted over product zones, deflector plates or catch pans were intact and maintained to prevent product contamination. However, catch pans were not in place at the flume line conveyor, and the Exeter feed gear box. Also exposed bearings with no catch pans were observed in various locations that were pointed out to managers during this survey, including the location over the Baby-B bins. Exposed sprockets and chain drives were observed over the product line of the Wyma line. A recommendation was offered that catch pans be provided to shield the product zones from the potential of contamination from the gear boxes and bearings. (IMPROVEMENT NEEDED)**
37. 2.11.0.0 Food-grade lubricants were used on food processing equipment. Food-grade and non food-grade lubricants were labeled and segregated from each other in a designated secure location. Compressed air did not blow onto the product at any point during this operation.
38. 2.14.0.0 Equipment and utensils were designed and constructed of materials that were easily cleaned and maintained. Wood was used in the pallets that were well maintained. There were catwalks above product zones after the final wash and they were covered. Dryers or air blowing equipment was not used.
39. 2.15.0.0 The facility followed a written Temporary Repair Program that defined food-grade materials appropriate for use as temporary repair materials. Repairs were properly dated and replaced ASAP. No temporary repairs were observed during this inspection.
40. 2.17.0.0 Temperature measuring devices were used to take the internal temperature of the product, for a specific customer. A calibration program was not in place for these thermometers. A recommendation was offered that a calibration program be implemented and the program traceable to a national standard. (MINOR ISSUE)

- 41. 2.19.0.0 Transporting equipment such as forklifts and pallet jacks were maintained to prevent contamination of materials. Forklifts were maintained on a PM program by an outside contractor.
- 42. 2.20.0.0 Food contact parts were stored off the floor in a clean environment. No parts or soiled belts were observed in storage.
- 43. 2.21.0.0 A Program was in place to monitor water quality and records were provided. The water was supplied by a private well. The well was secured by a concrete building. Water samples were sent to an outside laboratory for analysis. Test were conducted for coliform and nitrates, bacteria, and nitrite. The Program included water used for food contact. Back siphonage devices were provided and records of checks of the devices was current. Potable water was available to all employees.
- 44. 2.27.0.0 Field Sanitation Units (FSUs) were not required at this facility.
- 45. 2.28.0.0 Monitoring and measuring devices for regulating and recording pH, acidity, and water activity were not in use at the facility. Water was not recycled, and the waste water did not go to the city sewage system.

CLEANING PRACTICES

- 46. 3.1.0.0 Cleaning was done in a way that prevents contamination of raw materials, products, and equipment.
- 47. 3.2.0.0 Food approval documentation was provided for cleaning chemicals and sanitizers used to clean produce contact surfaces. This facility used Bay Soft, a cleaning chemical to clean food contact surfaces. Cleaning chemicals were diluted in compliance with the label direction.
- 48. 3.3.0.0 Adequate cleaning equipment and tools were available and stored away from production areas. Cleaning tools were labeled or color-coded to separate them based on their intended use. Separate and distinct utensils were used to clean food contact surfaces (product zones), structures (product areas), restrooms, and floor drains. Cleaning utensils were cleaned and properly stored after use. Tools were segregated in storage to prevent cross contamination.
- 49. 3.4.0.0 Daily housekeeping cleaning activities were carried out in a way that prevented contamination. Daily cleaning tasks were carried out so that work and support areas remained clean during the hours of operation. Water used for housekeeping activities was restricted to prevent product contamination.

- 50. 3.5.0.0 Deep cleaning of equipment and structures was conducted according to the Master Cleaning Schedule to prevent the development of microorganisms, insects, or foreign material. Periodic cleaning tasks complied with written procedures. There were no issues with the use of air hoses. Rack, dock leveler and perimeter cleaning activities were adequate.
- 51. 3.6.0.0 Maintenance cleaning appeared to be completed in a way that prevented product contamination. There was a presence or absence of tools, debris, lubrication or other potential contaminants. Visual inspection to identify contaminants after maintenance activities were conducted, and appeared to be adequate for this facility. GMPs were followed during maintenance activities.
- 52. 3.7.0.0 Product contact surfaces and utensils were cleaned and sanitized as appropriate to remove contaminants. Utensils, containers, and product zones were cleaned to prevent residues from being transferred to other products. No ice was used that required ice making equipment to be cleaned.

INTEGRATED PEST MANAGEMENT

- 53. 4.1.0.0 A formal Integrated Pest Management (IPM) Program with written procedures that included requirements of the facility's Prerequisite Programs was in place. The program was written by trained personnel from Steritech Brand Protection Services.
- 54. 4.2.0.0 An annual facility assessment that addressed all areas inside and outside of the facility was documented. Assessments were conducted by trained personnel from Steritech. The assessment was conducted on February 2, 2011. No corrective actions were required.
- 55. 4.3.0.0 The facility did not manage the IPM Program under an alternative guideline.
- 56. 4.4.0.0 A signed agreement was in place with the Steritech Company to provide IPM services. A copy of the service agreement included: materials, the facility name, facility contact person, frequency of services, description of services, term of contract, a current list of approved chemicals, emergency call procedures, service records to be maintained, and notification requirements for changes in materials or services.

57. 4.5.0.0 Current copies of certification (Expiration Date: December 11, 2011) were on file for all persons providing IPM services for the facility. Documents also observed were the Liability Insurance (Expiration Date: March 31, 2012) and Business License (Expiration Date: December 31, 2013). The service technician receive GMP training from this facility, January 10, 2011.
58. 4.6.0.0 Current copies of the pesticide specimen labels and Material Safety Data Sheets (MSDS) were on file for pesticides listed as being applied at the facility. (Confrac Blox, EPA #12455-79.)
59. 4.7.0.0 Documentation of all pesticides, including rodenticides, applied on the premises included: materials applied, registration number, target pest, amount applied, specific area where pesticide was applied, method of application, rate of application or dosage, date and time treated, and applicator's signature. Documentation indicated that the applications were made according to label directions. PCO's certification number was provided. The lot numbers of pesticides were recorded.
60. 4.8.0.0 Pesticides and application equipment were not stored at the facility.
61. 4.9.0.0 The outside IPM service provider left a service report after each visit. These records provided documentation of the checks and findings for 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. Pest sighting log was used and corrective Action was documented. Records were reviewed on a quarterly basis for evidence of trends in pest activity. Responses were appropriate to the findings.
62. 4.10.0.0 A detailed facility survey was documented and used to determine placement of all pest monitoring devices. A current site map that lists the locations of interior and exterior pest control devices was on file. No temporary traps were observed.
63. 4.11.0.0 Exterior pest monitoring devices, such as traps and bait stations were provided for exterior rodent control. Exterior rodent monitoring devices were installed around the exterior perimeter of the facility at appropriate intervals. These stations were tamper resistant, properly positioned, anchored in place, secured, and properly labeled in compliance with regulatory requirements. Pest monitoring devices were serviced at least monthly. Fresh bait had been supplied in the stations that were randomly examined.

- 64. 4.12.0.0 Mechanical rodent traps were installed to monitor rodent activity inside the facility and were properly positioned. The randomly examined traps appeared to be properly maintained. Traps were inspected on a weekly frequency.
- 65. 4.13.0.0 Insect light traps (ILTs) were used in the facility to aid in monitoring insect activity. These traps were more than 10 feet (3 meters) from exposed products. The traps were scheduled for weekly cleaning in the summer and monthly cleaning in the winter, or as dictated by climate. A record of the service, cleaning and activity levels of each ILT was maintained. Light tubes were shatter resistant and were changed out annually.
- 66. 4.15.0.0 Bird activity was not noted in or around the facility.
- 67. 4.16.0.0 Wildlife, including domestic animals, was not observed at the time of the survey.
- 68. 4.17.0.0 Pest habitats and pest activity were identified and eliminated. No evidence of rodent or insect activity was noted in or around the facility.

ADEQUACY OF PREREQUISITE AND FOOD SAFETY PROGRAMS

- 69. 5.1.0.0 The facility had a documented policy statement outlining its commitment to produce safe and legal products. Policy was signed reviewed and communicated to staff.
- 70. 5.2.0.0 A current organizational chart was maintained. Responsibility and authority for ensuring food safety and defense and compliance with federal, state, local, and any other appropriate regulatory laws or guidelines were clearly assigned to the General Manager/ CEO. This person stays current of regulatory issues through in house education programs. This facility was licensed by the State of Idaho and was current.
- 71. 5.3.0.0 Based on a review of the facility and related documentation, an appropriate budget and adequate labor support appeared to be in place to maintain the timely acquisition of tools, equipment, monitoring devices, chemicals, and other required resources.
- 72. 5.4.0.0 Written procedures were established to define step-by-step processes to ensure product safety. Job descriptions were maintained for all job positions. The job description for laborer was observed. Alternates were in place for key positions.

73. 5.5.0.0 **Specific written procedures were on file for providing food safety training to all personnel and contractors. Records of new employee training and annual refresher training were maintained for all personnel. Exit criteria was not established. A recommendation was offered that exit criteria be provided for food safety training, to verify that employees understand the material presented. (IMPROVEMENT NEEDED)**
74. 5.6.0.0 Monthly facility inspections were documented and included participation by key personnel. Documentation of the monthly inspections included identified observations, specific assignments, Corrective Actions, and actual accomplishments.
75. 5.8.0.0 A written Program for evaluating Customer Complaints was established. This Program included a plan for quick distribution of complaint information to all departments responsible for implementing Prerequisite and Food Safety Programs. Complaint information was used, where appropriate, to avoid recurrence and implement ongoing improvements to product safety. Actions appropriate to the seriousness and frequency of the identified problems appeared to be carried out promptly and effectively.
76. 5.9.0.0 A written Chemical Control Program that addresses all chemicals used in the facility was established. The program addressed adequately the requirements of the consolidated standards, including contractor chemicals.
77. 5.11.0.0 A documented Allergen Control Program was not needed as there were no identified allergens in use at this facility.
78. 5.12.0.0 The facility had a written policy stating that no glass, brittle plastics, or ceramics were to be used in the facility, except where absolutely necessary. Included in the policy was a procedure to handle any breakage in the facility. A list of all essential glass brittle plastics and ceramics was developed. The facility was inspected on a routine frequency to ensure that any accidental breakage was found and addressed.
79. 5.13.0.0 A formal documented Cleaning Program that included a Master Cleaning Schedule (MCS) for periodic cleaning assignments as well as a daily housekeeping schedule was developed and implemented in this facility. The MCS specified frequency, responsibility, post-cleaning evaluation and Corrective Actions. Written cleaning procedures were developed for all equipment, structures, and grounds that impacted storage, processing and packaging of food products.

80. 5.14.0.0 A formal Preventive Maintenance Program and work order system was used to prioritize problems in structural, equipment, or utensil maintenance. A recommendation was offered that the PM program be reviewed to address issues noted in the body of this report, like the catch pans under gearboxes and bearings in the processing area. (MINOR ISSUE)
81. 5.15.0.0 Incoming ingredients, packaging, and transports received into the facility were inspected by trained personnel according to established written procedures. Personnel in this facility were trained on the inspections of tractor trailer trucks and rail cars. Inspections were documented and current and included the date of receipt, carrier, lot numbers, amount, seal numbers, product condition, and trailer condition.
82. 5.16.0.0 A written Regulatory Affairs and Inspections Program was on file. The Program included a list of personnel delegated to accompany all inspectors along with the company policy regarding recording devices, cameras, records, and sample taking. No regulatory inspections had been conducted in the last year.
83. 5.17.0.0 Evidence of registration under the FDA Bioterrorism Act was on file at the facility. The facility had conducted a Vulnerability Assessment to identify food defense risks. A trained food defense coordinator was in place with a food defense team, and met the requirements of the Minor Requirements of the consolidated standards. The program was reviewed annually.
84. 5.18.0.0 A documented Traceability Program that addressed identification of lot numbers of raw materials, rework, food contact packaging materials, work-in-progress, finished product, distribution, and processing aids was developed and in place. All finished products were coded and recorded.
85. 5.19.0.0 A written Recall/Withdrawal Program was on file. Distribution records were maintained to identify the initial point of distribution to facilitate segregation and recall of specific lots. The Recall Program was tested twice annually and test results were documented. March 19, 2011 was the date of the last mock recall exercise. In this exercise, a particular lot was traced, with 100% accountability.
86. 5.20.0.0 A written Program was in place to control nonconforming products, including work-in-progress, finished products, and returned goods. Corrective Actions equal to the seriousness of the risk appeared to be taken. Records included disposition of products and if amounts were accounted for. Returned goods were not accepted at the facility.

87. 5.23.0.0 Letters of Guarantee or Certifications for received materials and finished products were on file and current. Letters of Guarantee indicated compliance to Defect Action Levels (DALs) for raw materials, finished product and packaging, as applicable.
88. 5.25.0.0 A Hazard Analysis Critical Control Point (HACCP) Program was developed and implemented for processes and process lines. The HACCP Plan was signed and was managed by a trained HACCP team leader with assistance of HACCP trained team members. Finished Product Profiles were provided for each product produced. A current Process Flow Diagram was in place. The seven principles of HACCP were followed in the development of the HACCP Program and included a risk assessment for both the ingredients and the process. Documented training was current for management and non-management personnel and for those with designated CCP responsibilities. The HACCP Plan was validated by the in house HACCP team. No CCPs were identified.
89. 5.28.0.0 Field and/or Supplier Certification Programs were not applicable to this facility.