



FOOD SAFETY AUDIT REPORT

#12714

Taylor Warehouse Corp.
2875 E Sharon Road
Cincinnati, OH 45241

By
BRAD FISHER
Food Safety Auditor

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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>

RATING

A food safety audit was conducted at this facility on April 27, 2007.

The writer was accompanied throughout the audit by Mr. Keith Swensen, General Manager; Mr. Rick Johnson, Food Safety Manager; Mr. Tim Paff, Facility Manager.

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 with Mr. Brian Burkhart, Human Resource Manager; Mr. Keith Swensen, General Manager; Mr. Rex Taylor, President; Mr. Rick Johnson, Food Safety Manager; Mr. Tim Paff, Facility Manager.

The roof was not accessible due to safety reasons. The ladder to the roof was understood to be approximately 25 feet high and should not be climbed due to plant safety considerations. Also, building #3 was requested to not be included in the audit. It was understood that this warehouse stored equipment for other facilities.

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 (925)

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: April 27, 2007
TYPE OF AUDIT: Announced
OVERALL RATING: **SUPERIOR**

ADEQUACY OF FOOD SAFETY PROGRAM	175
PEST CONTROL	195
OPERATIONAL METHODS AND PERSONNEL PRACTICES	195
MAINTENANCE FOR FOOD SAFETY	175
CLEANING PRACTICES	<u>185</u>
TOTAL:	925

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 Food Safety 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 of the entire plant. Documentation of the monthly inspections included identified deficiencies, specific assignments, and actual accomplishments. Follow-up inspections were done to ensure that the items were corrected. The records reviewed for the self-inspection program were relatively detailed. However, it was recommended to continue to provide education and training for the food safety team to help provide more detailed and thorough inspections.
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 and signed off by the Food Safety Manager. The schedules were documented as current, and the conditions observed in the warehouse supported the documentation, except for the minor issues noted. The schedule included the outside grounds, buildings, and equipment. It was recommended to add the ceiling on the MCS to strengthen the program. It was also suggested to review periodically the cleaning program to ensure all items/areas were included.
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.

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. There was a bird dropping noted on the plastic wrap of a pallet located in building #2. After discussion, no bird activity had been noted inside and this appeared to have been received with this issue. No other droppings were noted. It was recommended to remove the stretch wrap and rewrap as well as thoroughly inspect all other pallets in this area. It was also recommended to inform the receiving personnel of the supplier and more closely monitor goods received from this supplier. In addition, it was recommended to contact the supplier and communicate this issue to help prevent further issues. (IMPROVEMENT NEEDED)**
8. A hazard analysis for all products being stored or shipped from the center had been conducted. This facility currently does not store fish; however, the HACCP program indicated that fish was occasionally cross-docked. It was understood that fish cross-docking was a new part of the warehouse function and had not yet begun; however, addressed in the HACCP program for preparation of this process. The program had a HACCP team, flow chart, hazard analysis, and reviewed whenever any changes were made or at least annually. The program indicated that there were no Critical Control Points (CCP) and last reviewed on April 11, 2007. The Food Safety Manager was the Team Leader and had formal HACCP training.
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 personnel, including temporary personnel and contractors. Records of training completion for new employees and annual refresher training documentation were maintained for all personnel. The last refresher training had been conducted on April 14, 2007. Also, GMP training records were maintained at the plant for temporary personnel. In addition, each contractor had signed the GMP policies and records maintained.
10. A formalized, written program for evaluating customer complaints, particularly those related to adulteration, was established at this location.
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. Test traces and mock recalls were conducted at least every six months with appropriate documentation maintained on file. The date of the last such exercise was April 10, 2007 and the previous mock recall in February 2007.

12. Written procedures were in place to control damaged or returned product. Records were kept of the corrective actions and disposition of the product and adjustments were made to the product inventory records to account accurately for the damaged or destroyed materials.
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. The last regulatory inspection had been conducted by the Ohio Department of Agriculture on November 15, 2006.
14. A written policy stating that no glass was 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 monthly frequency to ensure that any accidental breakage was found and addressed. Also included was a map that had glass and brittle plastics identified as to the locations. However, it was recommended to include in the policy that the warehouse had some products that were in glass containers and these would also be inspected on the monthly audits.
15. **A formal preventive maintenance program and work order system was in use to order the elements of identified structural, equipment, or utensil maintenance problems that could cause food adulteration. This included such systems as the fork lifts, cooling units, dock doors, etc. Due to the significant issue relating to condensate dripping onto product, it was recommended to more readily identify and timely address the structural maintenance problems that could cause food adulteration. (IMPROVEMENT NEEDED)**

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 Terminix Pest Control 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 (with expiration on January 1, 2009) and current applicator's license (by the State of Ohio with expiration on September 30, 2007) were maintained on file. The pest control company only provided service for the outside bait stations and monthly service for the interior traps.

18. The pest control services at this location were conducted in-house under the supervision of a currently licensed or trained Pest Control Operator (PCO). This person was the Food Safety Manager with license from the State of Ohio with expiration on September 30, 2007. The in-house personnel applied pesticides that may be needed inside the plant as well as monitored the internal rodent traps and electric light traps.
19. All service records were reviewed for the last 13 months and the Material Safety Data Sheets (MSDS) and sample labels were maintained on file for all pesticides applied and/or stored on the premises.
20. 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.
21. 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.
22. A schematic depicting the locations of the interior and exterior pest control devices, including mechanical rodent traps, pheromone lures, insect light traps, and bait stations, was maintained on file and appeared current.
23. Mechanical mousetraps were installed to monitor for rodent activity inside the facility. These traps were properly positioned along walls and next to doors to the outside. The traps were inspected on a monthly basis by the PCO and by the in-house personnel on the off weeks. 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, except for the minor issue noted.
24. 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 monthly. Fresh bait had been supplied in the stations randomly examined. The service and results of the checks were documented on the laminated cards inside each unit, the service reports, and trend logs.

25. Electronic flying insect light traps (ILTs) were used in the facility to aid in monitoring insect activity. These traps were more than ten feet from exposed product. The traps were serviced by the in-house personnel and 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.
26. Pheromone lures or traps were used in this facility as a means of monitoring Indian Meal Moth and grain beetle insect activity. These traps were checked weekly, and records were maintained of the findings.
27. All pesticides and application equipment were stored in a locked cabinet located in the maintenance shop and was identified with appropriate signage. Materials to control spills or leakage were provided in the storage enclosure.
28. Trap #32 would not trip when this writer inspected the unit. After investigation, the laminated label inside was glued to a piece of cardboard for easier marking. The cardboard stopped the mechanism from working and properly functioned after repositioning the cardboard. It was recommended to provide small pieces of cardboard to help prevent the mechanism from working.

OPERATIONAL METHODS AND PERSONNEL PRACTICES

29. Damaged or soiled materials and any materials shipped in dirty or infested trailers or containers were rejected at the time of receipt.
30. Eighteen-inch perimeters, which were painted white, were maintained in all storage areas to provide cleaning and inspection access. Adequate space for cleaning was maintained amid rows of stored products.
31. 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. This was maintained on a computer database.
32. All perishable materials were stored at or below 40 degrees F (4 degrees C), and the frozen materials were at or below zero degrees F (-18 degrees C). The refrigerated and frozen storage areas were fitted with quick-opening doors to maintain proper temperatures.
33. Toxic chemicals, including the cleaning solutions, maintenance compounds, and non-food-related materials, were completely segregated from all food ingredients and packaging materials.

34. Rubbish and waste materials were properly stored outside the facility in a suitable compactor/dumpster, which was emptied as necessary. The area was generally well maintained and free of excessive spillage.
35. Damaged goods were removed to an identified recoup area for repacking or eventual disposal. Damaged items were removed for suitable disposal weekly. Repacked materials were identified to maintain traceability.
36. 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 and lunchroom. Smoking was only permitted outside.
37. Shipping vehicles were inspected before loading for cleanliness and structural defects that could jeopardize product integrity. Temperatures of precooled vehicles to transport refrigerated or frozen product were checked before loading. Issues that were found were documented.
38. All employees observed during the survey appeared to be practicing good personal hygiene habits. Eating, drinking, and smoking were restricted to designated areas.
39. There were two recoup rooms and a radio was noted stored on top of a case of food product in building #2. This currently did not pose a risk due to the case was completely closed. However, it was recommended to store the radio on the table to help prevent any broken pieces that may occur to pose a risk.

MAINTENANCE FOR FOOD SAFETY

40. The location was maintained and located to prevent contamination and enable the storage of safe and legal products. Location security plans included controlled parking, locked doors, surveillance cameras, guard services or security patrols, and truck seals. There was a security program in place that included visitor badges, sign-in before entering, and all doors were either locked or required swipe cards to enter.
41. The exterior grounds were maintained in a manner that prevented pest harborage. Litter and waste were not evident and weed growth was controlled.
42. The building was appropriate in size and layout to ease the maintenance and sanitary operation for food storage.
43. The floors, walls, and ceilings throughout the plant were of sound construction and well maintained. No roof leakage was evident.

44. Adequate lighting was provided in all areas, and the light bulbs, fixtures, mirrors, skylights, or other glass suspended over the general stock storage and exposed product areas were of the safety type or noted on the essential glass list. Protected lights were noted in the recoup areas and all of building #2 warehouse storage. It was understood that as lights needed replacing, the lights would have coated or protected bulbs.
45. The physical building was maintained to provide necessary barriers for effective protection against rodent, birds, and insects. Close fitting external doors were noted.
46. Constant recording thermometers or indicating thermometers were used in all rooms or areas where perishable or frozen foods were stored or handled. Documentation of the temperatures, either through constant temperature monitoring systems or manual checks, was maintained and was readily available.
47. **There was a pallet of cheese located in cooler #100 that had a small amount of water noted on the top case. After investigation, the ceiling had condensate in this area and had dripped onto the case. The corrugated case was completely enclosed and the cheese packets inside were sealed with plastic. There was no other condensate noted, except for the opposite side of this cooler where condensate had dripped onto the floor. However, it was recommended to investigate the reason for the condensate to help prevent any cross contamination issues. A fan had been installed to help blow air across the ceiling, however, this was currently note turned on. It was further recommended to keep the fan on during more humid times and consider providing additional fans, if needed. (IMPROVEMENT NEEDED)**
48. Some of the cement floor expansion joints needed sealed. There were some wood chips noted inside the areas near 001-011-1, 491, and 4344. It was recommended to vacuum the void and seal to prevent wood chips, possible mold, or pest harborage. This should also help provide easier cleaning. There were several rooms of the warehouse and further suggested considering a scheduled frequency to monitor expansion joints on a room-by-room basis on a regular schedule.
49. Some of the fork lifts had cardboard and tape for a makeshift pen holder. Tape and cardboard cannot be cleaned and it was possible that dust or insects could stick to the tape. It was recommended to provide a permanent repair such as PVC pipe and secure with zip ties or other design.
50. The facility used propane fork lifts. An outside contractor would conduct propane checks every six months to help prevent any leaks. This helped maintain employee safety as well as possible propane odors getting into the stored products.
51. There were guard rails located around many of the cooler perimeters to help prevent fork lifts from damage to the structure. The exception was cooler #200 and there were plans to install guard along the perimeters in this area in the near future.

52. Several of the docks had new cushions installed to help maintain a good seal and help prevent insect or other pest entry concerns.

CLEANING PRACTICES

53. Adequate cleaning equipment and tools were available and stored away from the production areas.
54. The overhead areas were cleaned frequently enough to prevent insects or filth from contaminating the food products in storage.
55. The pallet racks and storage shelves were cleaned frequently enough to remove spillage and dirt buildups and prevent pest development.
56. The floor areas were cleaned on a regular schedule to eliminate food residues and maintain a good cosmetic appearance.
57. The painted perimeters were cleaned and mopped at least monthly or more often, if necessary, to maintain a good appearance.
58. The facility grounds were well maintained and free of miscellaneous trash and debris, except for the minor issue noted.
59. The trash compactor area was maintained in an acceptable sanitary condition.
60. There was some minor webbing noted on the ceiling/wall junction above some of the shipping/receiving docks as well as the east ceiling/wall junction in the candy room. All other areas of the inside of the plant were very clean. However, it was recommended to provide more detailed cleaning in these areas and add the ceilings to the MCS.
61. There was a dead bird noted on the east side outside grounds near the building. It appeared that possibly the wind had blown the bird into the wall. It was recommended to remove the bird to help prevent any other pest attraction concerns.