

Attachment 6



Procedure Name: Pre-op Micro Testing - Environmental			
Procedure # 2.4.8-03	SQF# 2.4.8 and 9.2.5	Date: 07/1/21	Created by: AW
Page 1 of 2	Facility: San Diego, CA	Revision #: 5	Approval: DD

MICROBIOLOGICAL STANDARDS FOR ENVIRONMENTAL TESTING FOR PRE-OP

The QA Department performs a daily organoleptic pre-operational sanitation inspection after equipment cleaning and sanitizing and will perform random microbial swab testing for: Aerobic Plate Count (APC).

2.4.8.1 A risk-based environmental monitoring program shall be in place for all food and pet food manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

2.4.8.3 An environmental sampling and testing schedule shall be prepared, detailing the applicable pathogens or indicator organisms to test for that industry, the number of samples to be taken, the frequency of sampling, and the methods to handle elevated or undesirable results.

2.4.8.4 Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

Procedures:

- Swabs will be taken after pre-operational inspection has been completed
- Areas of food contact surfaces (Zone 1) will be swabbed, conveyor belts, inside buggies, hoppers, grinding blades, inside paddle mixers.
- Random equipment will be swab each time. Use Swab Test Sheet to record date test were performed.
- Each equipment is to be swabbed at least once every 6 months.

Frequency

- Four swabs will be taken on first round, per week.
- If action level is reached on a swab, then the re-tested swab is added to the four swabs next week.

Environmental Guide Line:

Micro

Target

Action Level

APC

100/area sampled

1000/ area sampled

Date	History of changes: Reason of change	Changed by	Comments
9/14/18	Changed SQF# per edition 8,V2	NB	
9/16/18	Update per SQF, Ed 8	DD	
9/24/18	Replaced with APC testing, added corrective action	LN	
7/1/21	Updated to SQF Ed. 9, r5	DD	



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Action Level:

In case of any Action Level have been reached, these actions will be taken:

- Sanitation and night Production will be notified immediately.
- Corrective action will be issued to Sanitation.
- The area or item will be re-tested within a week, result will be reviewed and decision will be made base on final results.

Responsibility:

QA Supervisor

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Procedure Name: ATP MONITORING PROGRAM		
Procedure : 9.2.5-02 SQF 9.2.5	Date: 07/1/21	Created by: CM
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		Approval: DD

Purpose:

Assure that an adequate Sanitation Program is taking place by an effective verification process after cleaning and sanitation is completed, and before starting operations.

Reference:

- CHARM-Novalum and Pocket Swab methodology
- 9.2.5-24 ATP Novalum Daily Result Log- Zone 1 (Electronic Log QA Drive)
- 9.2.5-18 ATP Novalum Daily Result Log- Zones 2 & 3 (Electronic Log QA Drive)
- 9.2.5-12 Master Cleaning Schedule
- 9.2.5-19 ATP Zones 2 & 3 Presentation (with Swab Sites)
- 9.2.5-20 Swab Sites List

Responsibilities:

During pre-operations and after the Sanitation process have been completed, QA Supervisor or designee will take ATP swab samples according to program. The Supervisor or designee may also participate in taking swabs, so they can also check sanitation status when they need to. The Sanitation Supervisor or designee will be responsible for the sanitation prior to ATP test, and for re-cleaning in the case ATP results are above limits.

Procedure:

Area must have been cleaned and sanitized prior to taking swabs. The sanitizer, if applied in the proper concentration shall not impact swabs results. **Do not take swabs if plant is not running production.**

The QA Supervisor will select at least eight food contact surfaces on a weekly basis from the Plant Master Site List. There are 4 main areas in the Factory: Grinding area, former patty machine area, process fresh area, packaging frozen area. The QA designated employee will randomly choose one swab per area, until all weekly planned areas are covered.

Sites selected will be divided into different days throughout the week (**i.e. Monday, Tuesday, Wednesday, Thursday, and Friday**)

A designated employee will send sites selected daily via email to: Sanitation Supervisor & Leads along with a physical print out (which in a designated in box located inside the micro-lab).

The sanitation lead of the area will ensure any equipment surface to be tested, is clean and notify personnel when equipment is ready.



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On non-contact surfaces is monitoring using ATP Novalum

The QA Supervisor or employee designee will select at least four non-food contact surfaces on a weekly basis from the Swabs site Zone #2 and #3 (see 9.2.5-20 Swab sites). The QA designated employee will randomly choose one swab per area, until all weekly planned areas are covered. (See 9.2.5-19 ATP Zones 2&3 Presentation for pictures of swab sites).

Testing with Charm Novalum:

The designated employee taking the swabs must gather and prepare the following supplies:

1. Vinyl gloves,
2. ATP Pocket Swab-Plus,
3. ATP *CHARM NovaLum* machine.
4. Daily ATP count data log

Pocketswab plus:

- Identify Pocket swab plus with site numbers on it
- Swab the 4” x 4” area selected to be tested. Twirl the swab to achieve full contact with the surface.
- Reinsert swab into body and engage the threads. Screw the swab all the way down.
- Snap the liquid down into the bottom of the clear tube and make sure tablet is dissolved.
- Immediately insert pocket swab into Novalum chamber,
- Identify location of test area using the novalum keypad
- Press ok to initiate count.
- If limit are above allowable limits, process to notify Sanitation to re-clean and sanitize. Then retest again and document results on pocketswab itself
- Fill out data log form

Note: A test resulting in a value $\geq 5,000$ for the tested material is deemed a “Fail” and equipment will need to be re-cleaned then retested until an acceptable value is achieved.

A test resulting in values $< 5,000$ than the established limit, for the tested material, is deemed a “Pass” and Sanitation is notified to proceed with sanitizer.

Place data sheet in QA Lab ATP binder for verification.

The Quality Assurance Supervisor or designee will verify, and input data electronically.



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Results are placed in the Daily ATP Binder for USDA review weekly and a monthly graph showing supporting results will be sent to Sanitation Manager & QA Manager/Supervisor.

Calibration:

Once quarterly, the QA Supervisor will perform a calibration of the Novalum unit, by following the “PocketSwab Plus Calibration Check procedure.

Document Control:

Date	History of changes: Reason of change	Changed by	Comments
6/26/15	New Rev1	CM	
8/19/15	Made Changes to Calibration – changed per month to quarterly,r5	LW	
8/16/16	Added Ref numbers, and non-contact surface area information, r6	LW and MM	
7/1/21	Updated to SQF Ed. 9, was 11.2.13, Ed 8.1, r7	DD	