



Process Flow Narrative

Description of Operations:

Proper Beverage is a processor of private label co packed beverages. Beverages include Cold Filled Carbonated Formula Preserved Beverages and Tunnel Pasteurized beverages (Carbonated). Products are produced to customer specifications. Beverages can be produced in a variety of packaging including, aluminum cans, one-way kegs and commercial totes. At Proper Beverage we believe that beverages should be made the proper way — with pure ingredients, natural flavors, and creative integrity. That's why we created Proper Beverage Co., to empower visionaries like you with the tools you need to bring your beverage dreams to life. And because we believe in our process, we produce sodas and cocktails of our own using simple ingredients and a spark of creativity to create a taste you can trust. That's the Proper difference.

Food Safety

Food Safety is always at the forefront at Proper Beverage. Upper Management plays a key role in providing all necessary resources to carry out a successful Food Safety program. A Food Safety team has been created. A globally benchmarked Food Safety program has been created including a Food Safety Management System, Good Manufacturing Practices and HACCP Programs. Upper management takes a pro-active approach to providing training for its food safety team above and beyond requirements set forth by regulatory guidelines. The food safety team takes pride in providing quality employee food safety trainings for all of its employees. Proper Beverage upper management and the Proper Beverage food safety team are extremely proud of its food safety program and continually strive to improve and meet the needs of their clients.

Ingredient Receiving

The operation is segregated into 3 areas 1) receiving, storage and shipping. 2) The Production. 3) Offices, employee rest areas and lab.

Ingredients are received from Co-pack clients and approved suppliers. Ingredients include flavorings alcoholic ingredients, packaging, sanitation chemicals, CO2 and water. There are allergens handled on site.

All incoming ingredients and packaging are inspected upon receiving. Product is assigned a designated storage areas awaiting use.

Storage

Client owned ingredients are assigned designated storage, (ambient, refrigerated) with special attention to not co-mingle company owned products. Alcohol based ingredients are stored in secure storage. Allergen based ingredients are given special attention in order to prevent cross contact. An allergen management program has been developed. Chemicals used for sanitation are stored in a dedicated and locked rooms which are sufficiently segregated from any products. Spill containment is in place.

Storage areas are maintained under sanitation and maintenance programs. All sanitation and maintenance work is documented based on schedules.

All temperature and climate requirements are monitored and documented. Wet and high humidity environments are under a Microbiological testing program, including a zonal schedule and swabbing program based on common pathogens related to those specific environments. Swabbing is conducted by an independent lab microbiologist.

Municipal water In addition, Municipal water is tested in multiple locations within the facility. The operation has an allergen Management program to address the receiving, storage and production of products. Employees are trained in proper allergen handling upon hiring and at least annually.

Processing of Beverages

(Cold Filled Carbonated Formula Acidified Preserved Beverages)

- 1) Ingredients are received, from the client or approved supplier into the warehouse.
- 2) Product is inspected per customer specifications and stored in designated areas.
- 3) As orders are scheduled for production, a batch ingredients and step log is generated. Ingredients for that production enter the production room through a specific receiving entrance. All ingredients are lot coded for traceability.
- 4) Ingredients are staged in a designated storage racking or refrigerator prior to batch formulation.
- 5) Based on customer formulation, a trained employee portions the batch formulas.
- 6) Each batch is documented on a Batch Ingredient and Step Log. Details include ingredients needed, the customer, batch size, date code, Product, can size, mix tank used. BRIX, ph., temperature and carbonation level are also documented. When batch ingredients are complete the qualified employee signs off on the batch including the date. See sample document attached. Samples of each batch are documented hourly.
- 7) Batch tanks are identified by number. Batch tanks are cleaned, sanitized and verified with an ATP swab device by qualified individuals. Tanks are cleaned by means of a Clean in Place System. Sanitation records are maintained.
- 8) Ingredients and filtered chilled water are added to the designated pre-batch tank(s)
- 9) An automated mixing of the ingredients takes place supervised by a qualified individual.
- 10) Once mixed the pre-batch is transferred to the larger designated batch tank(s) Measured amounts of filtered chilled water is added to the tank(s)
- 11) Controlled carbonation is added to the batch and measured
- 12) While the batch is being mixed, at another location of the production room qualified individuals prepare for the filling process. Preprinted cans supplied by the customer are

being staged for filling. The filling of the cans with the mixed product occurs in the upcoming automated steps.

- a) Cans are staged on a conveyor and inverted. Cans pass through an automated ionized air can cleaner/sanitizer.
- b) Cans pass through a Date Code Wheel which applies customer specified lot and date coding.
- c) Cans then pass through the automated filler which controls the portion of beverage per can.
- d) Filled cans pass under a capper, where can caps are applied and the can is sealed
- e) Sealed cans are rinsed and are conveyor guided under a blower to remove excess liquid. Quality inspections are documented at this step.
- f) Filled and sealed cans pass through a tunnel system where cans are air dried.

The area and equipment are cleaned and sanitized after each batch run by qualified individuals and CIP. Verification of the cleaning process is performed with an ATP monitoring device.

Processing of Beverages

(Carbonated – Tunnel Pasteurized Preserved Beverages)

- 1) Ingredients are received, from the client or approved supplier into the warehouse.
- 2) Product is inspected per customer specifications and stored in designated areas.
- 3) As orders are scheduled for production, a batch ingredients and step log is generated. Ingredients for that production enter the production room through a specific receiving entrance. All ingredients are lot coded for traceability.
- 4) Ingredients are staged in a designated storage racking or refrigerator prior to batch formulation.
- 5) Based on customer formulation, a trained employee portions the batch formulas.
- 6) Each batch is documented on a Batch Ingredient and Step Log. Details include ingredients needed, the customer, batch size, date code, Product, can size, mix tank used. BRIX, ph., temperature and carbonation level are also documented. When batch ingredients are complete the qualified employee signs off on the batch including the date. See sample document attached. Samples of each batch are documented hourly.
- 7) Batch tanks are identified by number. Batch tanks are cleaned, sanitized and verified with an ATP swab device by qualified individuals. Tanks are cleaned by means of a Clean in Place System. Sanitation records are maintained.
- 8) Ingredients and filtered chilled water are added to the designated pre-batch tank(s)
- 9) An automated mixing of the ingredients takes place supervised by a qualified individual.
- 10) Once mixed the pre-batch is transferred to the larger designated batch tank(s) Measured amounts of filtered chilled water is added to the tank(s)
- 11) Controlled carbonation is added to the batch and measured
- 12) While the batch is being mixed, at another location of the production room qualified individuals prepare for the filling process. Preprinted cans supplied by the customer are being staged for filling. The filling of the cans with the mixed product occurs in the upcoming automated steps.

- g) Cans are staged on a conveyor and inverted. Cans pass through an automated ionized air can cleaner/sanitizer.
- h) Cans pass through a Date Code Wheel which applies customer specified lot and date coding.
- i) Cans then pass through the automated filler which controls the portion of beverage per can.
- j) Filled cans pass under a capper, where can caps are applied and the can is sealed
- k) Sealed cans are rinsed and are conveyor guided under a blower to remove excess liquid. Quality inspections are documented at this step.
- l) Filled and sealed cans pass through a tunnel pasteurizer system where cans heated to the required temperature, held at temperature, cooled and dried.
 - a. Temperature verification checks are made of beverage 3-times an hour to ensure proper pasteurization.

The area and equipment are cleaned and sanitized after each batch run by qualified individuals and CIP. Verification of the cleaning process is performed with an ATP monitoring device.

Finished Product and Quality Control

- 13) The finished product is packed into assembled cartons. The cases are conveyed through a shrink tunnel for plastic sealing. The sealed cases emerge in the warehouse. A case lot/ identification code is applied to each case detailing; product description, pack count, SKU #, Lot Code and Bar code.
- 14) Finished cases are palletized and shrink wrapped. A label is applied to each pallet detailing the production.
- 15) Each production is documented on the production report by the qualified batch foreman. See attached sample report.
- 16) Two random samples from each batch are sent to an independent lab for food safety integrity testing. Acceptable lab tests must be received in order for the batch to be released to the customer

Storage, Staging and Product Release

Sample description. As product is sold, invoices are generated and entered into the software system. Each ingredient of every batch is lot coded. These individual lot codes follow through the entire formulating, batching, filling and final packing. All lot code documents are joined in the batch lot code paperwork. Every batch is given a lot code that is displayed on the finished product. Mock recall/traceability exercises are documented every six months minimum.

Forklift or pallet jack operators are given a copy of the order. They then select products and deliver to a general 'staging' area. As products are picked from the storage, they are visually inspected for quality, foreign material issues, and customer specifications. Any deficiencies are noted. If items are not deemed "saleable", they are placed on hold. Once products are picked and delivered to staging areas, the 'picker' signs or initials the order.

Distribution

As product is sold, the product is shipped via Contracted carrier supplied by the client or Proper Beverage Co.

All PBC contracted carriers must be approved through the operations supplier approval program. A specific set of requirements must be met before the carrier is permitted to transport any product from Proper Beverage. Visual truck inspection is in place for all shipments and documented.

Shipping personnel inspect delivery vehicles for integrity, cleanliness, pest activity, odors, and temperature if required. They also conduct one last visual inspection of the product. When trailers and products are deemed "acceptable" for shipping, the shipping personnel also initial or sign the order, indicating that items meet customer specifications and are acceptable for release. Trailer seals are documented.

Returns

Returns are rare given the finished product is processed per customer specifications. If in the event of returned product, instructions are directed by the client. No re-working of batched product is performed unless simple carton repacking is required. Original traceability is documented.



HACCP PLAN OVERVIEW

BACKGROUND INFORMATION

Plant Description and Background:

Proper Beverage Co. is in the business of manufacturing of cold filled carbonated formula acidified preserved beverages and carbonated cold filled tunnel pasteurized beverages. The format of this HACCP plan is the traditional USDA/FSIS/FDA templates traditionally used in this country. The risk assessment model is the one is provided in the BSI training. This plan follows the traditional Management System of Codex Alimentarius and the guidance document of NACMCF (The National Advisory Committee on Microbiological Criteria for Foods) for the Development of HACCP Plans.

Prerequisite programs and activities:

Before implementing this HACCP plan, the following plant-wide programs and activities were evaluated and maintained. The plant conducts routine audits of the prerequisite programs/Preventive Controls. Programs include but are **NOT** limited to;

- Current diagram of layout indicating product flow (blueprint diagram);
- Supplier Specification (certification) Requirements;
- Plant construction and maintenance (materials, waste disposal, toilet, and hand washing facilities etc.);
- Potable water supply;
- Cleaning and sanitizing procedures, including Schedules, SSOP's and completion logs;
- Preventive maintenance documentation for equipment, including calibrations;
- Training management Matrix;
- Procedures for receiving and storing and manufacturing of products;
- Shipping/distribution procedures, including specifications for trucks;
- Recall procedures including, traceability of raw materials to suppliers, coding of finished product, traceability through distribution and periodic mock recalls to verify that it works in the event of an actual recall;
- Supplier Approval and Monitoring program (e.g. supplier audits, licenses, proof of insurance, letters of guarantee).
- Microbiological testing program for water, environment and equipment.
- Allergen program identifying of allergens and employee trainings.

Document: Plan Overview	Page 1 of 3	Authorized by: Brian Hirsch
All Process Categories Manufacturing of Cold Filled Carbonated Formula Acidified Preserved Beverages & Carbonated Tunnel Pasteurized Beverages	Plant Address: Proper Beverage Co. Hudsonville, Michigan	Date of Issue: New 08/01/2021

These programs are the foundation on which the HACCP plan was developed and are important to the reliable functioning of the HACCP plan. The procedures for these programs are outside the scope of the HACCP plan.

Company commitment:

We at Proper Beverage Co. are proud of the products we produce and are committed to producing the highest quality and safest product in the industry. When developing these HACCP plans food safety is our primary concern. The HACCP concept deals with food safety and every effort has been made to evaluate all such hazards.

HACCP Team members:

Our HACCP Team members include people from all segments of production and administration. They are:

- 1. Larry Griesbach — HACCP Coordinator/VP of Operations/Ultimately Responsible for FSMS System
- 2. Dylan Lucas — Production
- 3. Drew Martinie — Maintenance
- 4. Mason Opple — Production/Asst. Plant Manager
- 5. Al Poschke — Quality Control
- 6. Cody Vannoord — Production/Plant Manager
- 7. Andrew Vredeveld — Warehouse Manager

Training and HACCP Team Meetings:

The HACCP coordinator and team have attended a class on the Development and Implementation of HACCP which is accredited by the International HACCP Alliance, Texas A & M University, located in College Station Texas.

Monitoring training for Control Points and on-going training will be conducted as changes to the plan dictate.

HACCP team meetings and re-assessment meetings are held and documented.

Process categories:

All products are produced under one process category. It is:

Manufacturing of Cold Filled Carbonated Formula Acidified Preserved Beverages

Control Points:

Control points for process control are incorporated into the plants GMP'S and SOP'S

Critical Control Points:

Ongoing determination

Document: Plan Overview	Page 2 of 3	Authorized by: Brian Hirsch
All Process Categories Manufacturing of Cold Filled Carbonated Formula Acidified Preserved Beverages & Carbonated Tunnel Pasteurized Beverages	Plant Address: Proper Beverage Co. Hudsonville, Michigan	Date of Issue: New 08/01/2021

General Information:

- I signify, on this date, that this establishment accepts and will implement the system. Our HACCP System will be signed and dated whenever it is reassessed and/or modified.
- HACCP records will be maintained for two years and will be made available to interested parties upon request.

DATE _____

APPROVED BY _____

Document: Plan Overview	Page 3 of 3	Authorized by: Brian Hirsch
All Process Categories Manufacturing of Cold Filled Carbonated Formula Acidified Preserved Beverages & Carbonated Tunnel Pasteurized Beverages	Plant Address: Proper Beverage Co. Hudsonville, Michigan	Date of Issue: New 08/01/2021



Doc #: 11.1	Title: Traceability System SOP	Date Created: 10/1/2020
Rev #:	Prepared By: Larry Griesbach	Date Revised: 08/01/2021

Traceability System SOP

Policy: Proper Beverage Co. co-packs Cold Filtered Carbonated Formula Acidified Preserved Beverages and Carbonated Tunnel Pasteurized Beverages. The majority of ingredients are supplied by the customer. All incoming ingredients are assigned lot codes and documented. The ingredients are documented during production and shipping.

Purpose: Traceability is a key requirement in the production of our products. This SOP gives an overview of the traceability system in the form of a flow process diagram. ***Note: All supporting traceability documents can be found in any of the mock recalls performed by the operation.***

Scope: Raw material, production through to finished goods.

Responsibility: The Food Safety Manager is responsible for the development of this SOP. All personnel are responsible for SOP enforcement.

Procedure:

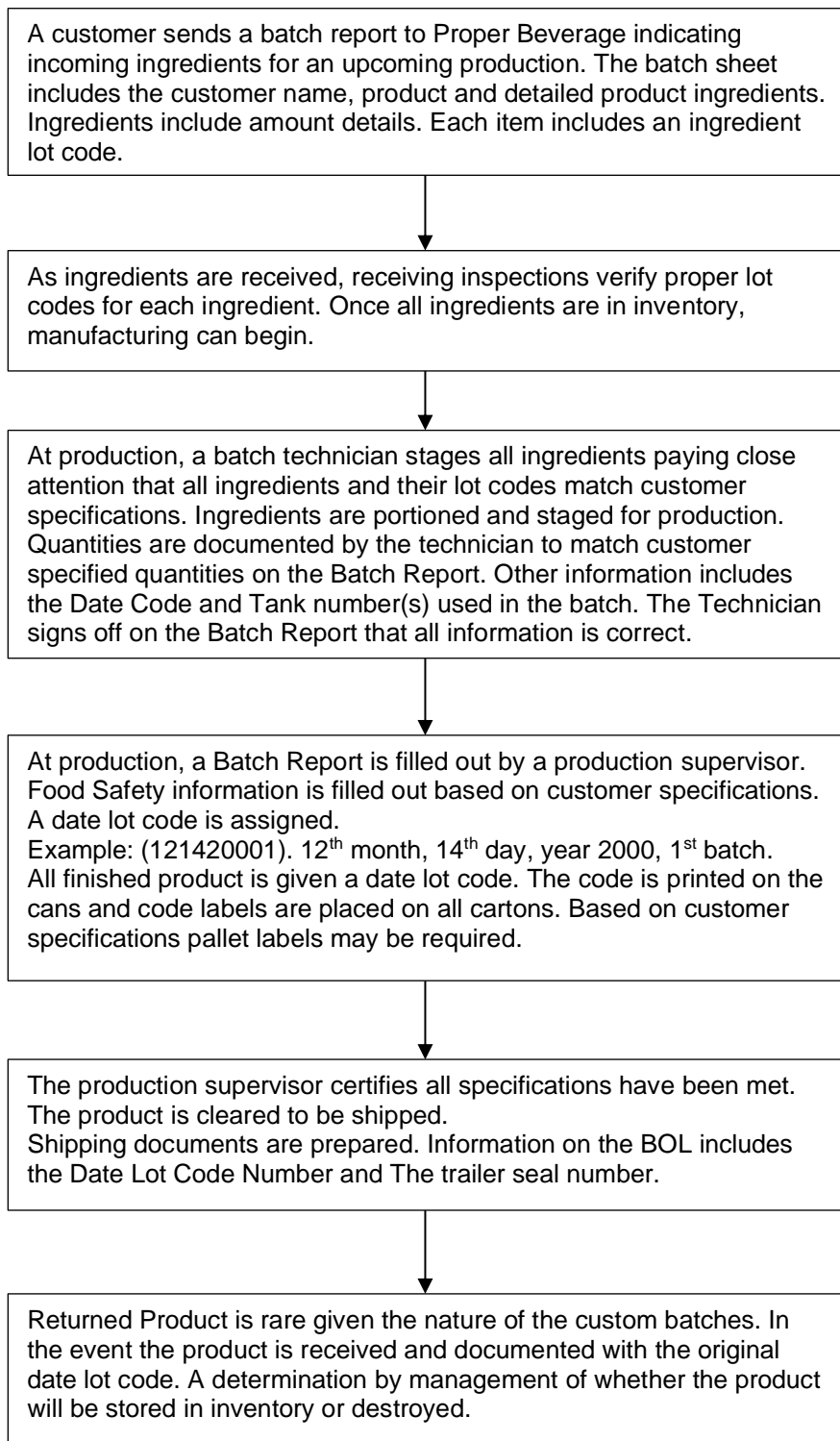
1. Process Flow Diagram Showing Traceability Program

- 1.1. The following process flow shows the company traceability from raw material receiving through to shipping.
- 1.2. Work in progress (i.e. partially processed goods) occurs rarely (e.g. when the can printer or label machine breaks down). Work in progress is required to be fully labeled to ensure traceability and to be used as soon as possible.
- 1.3. Rework is rare due to food safety and quality issues, but where allowed by management, details are recorded to ensure traceability is maintained.
- 1.4. Packaging date codes are also recorded on the production reports.

2. Testing the Traceability System

- 2.1. The traceability system is tested at minimum twice annually by means of mock recalls

Traceability Process Flow Diagram





Doc #: 12.1	Title: Traceback Recall SOP	Date Created: 10/1/2020
Rev #:	Prepared By: Larry Griesbach	Date Revised: 08/01/2021

Proper Beverage, Co.'s Product Recall Plan

Policy: Proper Beverage, Co. has an implemented traceability system which tracks raw materials, through processing to the finished goods. This system allows Proper Beverage, Co. to initiate recalls when required.

Purpose: To outline the recall process within Proper Beverage, Co.

Scope: This procedure applies to all receiving, storage, manufacturing and shipping of:
Cold Filtered Carbonated Formula Acidified Preserved Beverages and Carbonated
Tunnel Pasteurized Beverages

Proper. Beverage, Co.

Table of Contents

Section 1 - Recall Concept and Classification	3
Authority	4
Definitions.....	5
Recall Classification Categories	7
Section 2 - Traceback Procedure.....	8
Notification.....	9
Fact and Data Acquisition	9
Assemble Traceback/Product Recall Team.....	10
Traceback Review.....	11
If A Product Recall Is Not Warranted	12
Section 3 - Recall Procedure	13
Figure 1. Product Recall Flow Chart	15
Figure 2. Examples of Data & Documentation Required for Product Traceback & Forward. 17	
Section 4 – Individual Responsibilities of Product Traceback/Recall Team.....	18
Traceback/Product Recall Coordinator	19
Sales Manager	20
Distribution/Shipping Manager.....	21
Production Manager(s) And Production Supervisor(s)	21
Quality Control Supervisor	21
Receiving.....	21
Procurement/Buyer Manager.....	22
Management	22
Table 1. Traceback/Product Recall Team Contact Information	22
Section 5 - Model Forms	25
Figure 3. Customer Contact Form.....	26
Figure 4. Recall Communication Letter	28
Figure 5. Status Check Questionnaire	29
Figure 6. Media Request Form	31
Figure 7. Customer Feedback Form.....	31
Figure 8. Traceback/Product Recall Information Form	32
Figure 9. Traceback/Product Recall Action Log.....	33
Table 2. Product Recall Inventory Log.....	34
Figure 10. Mock Recall Summary Form (Form FAF001)	35

References

- <http://vm.cfsan.fda.gov/~lrd/recall2.html>
- <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm?CFRPart=7>
- http://www.fda.gov/fdac/features/895_recalls.html
- http://www.fsis.usda.gov/Fsis_Recalls/index.asp
- <http://www.fda.gov/oc/bioterrorism/bioact.html>
- http://www.fda.gov/ora/compliance_ref/recalls/ggp_recall.htm
- http://www.fda.gov/ora/compliance_ref/recalls/recallpg.html
- <http://www.recalls.gov>
- <http://www.fda.gov/consumer/updates/recalls123107.html>
- <http://www.cfsan.fda.gov/~furls/ovffreq.html>
- <http://www.cfsan.fda.gov/~pn/pnoview.html>

Section 1 - Recall Concept and Classification

RECALL PROGRAM

Authority

The Food and Drug Administration has established voluntary guidelines for conducting product recalls related to all foods. The product manufacturers or distributors carry out most recalls of products regulated by FDA voluntarily. In some instances, a company discovers that one of its products is defective (adulterated or misbranded) and recalls it entirely on its own. In others, FDA informs a company of findings that one of its products is defective and suggests or requests a recall.

FDA guidelines for companies to follow when recalling defective products under the Agency's jurisdiction are published in Title 21 of the Code of Federal Regulations, Part 117 Subpart B. <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=117&showFR=1&subpartNode=21:2.0.1.1.16.2> These guidelines make clear that FDA expects these firms to take full responsibility for product recalls, including follow-up checks to assure that recalls are successful. Under the guidelines, companies are expected to notify FDA when recalls are started, to make progress reports to FDA on recalls, and to undertake recalls when asked to do so by the Agency.

The guidelines also call on manufacturers and distributors to develop contingency plans for product recalls that can be put into effect if, and when needed. FDA's role under the guidelines is to monitor company recalls and assess the adequacy of a firm's action. After a recall is completed, FDA makes sure that the product is destroyed or suitably reconditioned and investigates why the product was defective.

Section 303(a) of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (the Bioterrorism Act) <http://www.cfsan.fda.gov/~dms/sec-ltr.html#sec303> adds section 304(h) to the Federal Food, Drug, and Cosmetic Act to authorize FDA to detain an article of food for which there is credible evidence or information indicating such article presents a threat of serious adverse health consequences or death to humans or animals. This authority is self-executing and provides an added measure to ensure the safety of the nation's food supply. The Bioterrorism Act also requires FDA to provide by regulation, procedures for instituting on an expedited basis certain enforcement actions against perishable foods subject to a detention order. Section 305 <http://www.cfsan.fda.gov/~dms/sec-ltr.html#sec305> of the Bioterrorism Act requires owners, operators, or agents in charge of domestic and foreign facilities that manufacture, process, pack, or hold food for human or animal consumption in the United States to register their facilities with FDA (unless the facility is exempt).

Definitions

A **product recall** is the removal or correction from the channels of distribution and consumption of any product deemed to be potentially hazardous or defective. A true recall of a food product occurs only when the product violates the law and is a likely candidate for seizure, condemnation or other legal action by the government. A food product may violate the law if it is “adulterated” or “misbranded”. Whether a product defect is likely to result in government action will depend on the particular food product and the potential risk to the consuming public. Recall does not include a market withdrawal or a stock recovery.

1. A food product is **adulterated** if it:
 - Contains a poisonous (e.g. Salmonella, E. coli O157: H7, cyanide) or deleterious substance (e.g. a piece of glass);
 - Contains an unapproved pesticide or a pesticide in excess of a specific legal tolerance set by the FDA and/or the Environmental Protection Agency (EPA);
 - Contains an unauthorized food or color additive;
 - Contains filth (e.g. insect parts, rodent excreta) or a decomposed substance or is otherwise unfit for food;
 - Was produced, prepared, packed, or stored under unsanitary conditions in which it may have become contaminated.
2. A food is **misbranded** if its labeling is false, misleading or does not contain information required by law. A product may be misbranded if:
 - The components of the food are not fully identified in the statement of ingredients;
 - The weight or volume is inaccurate or not declared properly; or
 - The label does not bear the nutritional facts panel.

Market withdrawal of a product is the removal or correction from channels of distribution and consumption of any product where no legal violations have occurred, or only minor violations that under normal circumstances would not be subject to legal action, e.g. normal stock rotation practices, incorrect barcode, tampering without evidence of manufacturing or distribution problems, etc.

Stock recovery is a firm's removal or correction of a product that has not been marketed or that has not left the direct control of the firm. For example, the product is located on the premises owned by, or under the control of the firm, and no portions of that lot have been released for sale or use.

A **product safety investigation** is an internal trace of product origin/history prompted by notification by the FDA or a state health department, a customer or quality control/production personnel that there may be a potential food safety or physical defect in a specific product. The facts of the investigation will determine if a product recall, market withdrawal or stock recovery is warranted.

A **mock recall** is an internal exercise to test your company's ability to trace and recall product. Mock recall exercises are scheduled on a semiannual basis (at least) using differing scenarios to ensure the mock recalls run smoothly. This exercise shall be documented to measure the effectiveness of the mock recall process then reviewed to identify and correct any internal problems discovered. [It is the company's mission to conduct mock recalls as a team effort to ensure the recall program has been effectively challenged. The team continually implements new challenges based on current food safety events. It is the company's mission to account for 100% of all recalled product.](#) Key elements [demonstrating effectiveness](#) of the mock recall documentation include scenario, time taken, accounting for affected product, documenting time

line, copies of [supporting](#) documentation that show the traceback and any lessons learned from the exercise.

Mock recall exercises allow you to "fine-tune" your system. How easily can you trace and recover your products? How long does it take from deciding to carry out a recall to actually being able to inform the affected customers? How easily can you traceback the origin of a particular packaging item? How much product is accounted for? This might include culled materials. If a supplier or grower detects a recall issue, they should contact all affected operations to which they have sold their products. This initiates a trace forward from raw material through to finish. Mocking one of these different scenarios is also useful sometimes.

Have an **emergency management communication strategy** in place as advance preparation for unexpected events e.g. a positive *L. monocytogenes* or Salmonella sample, a food-borne outbreak, a natural disaster, product tampering or a bomb threat. Form a crisis communications team and give each member specific tasks. Designate a leader who will be your media spokesperson. Another person will notify customers (via telephone, letter, and e-mail), another team member will focus on interacting with regulatory personnel. Someone must be carefully trained to answer the calls that come to the company, following a media announcement, who may or may not be legitimately reporting illnesses, or simply regular customers who become irate or overly concerned about the safety of their family. Clearly describe each person's role and designate alternates (in case the designate is unavailable) in the emergency management plan. Keep all the information you need to know in the event of a recall in one place.

A **product code** is required under Good Manufacturing Practices and provides meaningful information regarding product lot number, packing date and packing location. The product code needs to be entered on all appropriate quality control records, production reports, procurement reports and shipping reports so that the product can be traced at a later date if necessary. The out-loading product code(s) is/are usually the first step back in the traceback process through the production and storage processes, through to incoming lot or lots and vice versa in a trace forward scenario

Recall Classification Categories

There are three **FDA recall classification categories**:

Class I: there is a reasonable probability that eating the product will cause death or serious health problems.

Pathogenic organisms such as *Listeria monocytogenes*, *Clostridium botulinum*, *E. coli* 0157:H7, *Salmonella enteritidis*, undeclared peanuts or tree nuts (pecans, hazelnuts, filberts, walnuts, cashews, and brazil nuts), undeclared eggs and undeclared sulfites (10 mg or more per serving), in the product would be given this classification. Other pathogenic organisms may also be considered in this classification depending upon the specific situation, amount of product distributed, extent of product consumed, age and health of the individuals exposed, etc.

Class II: there is a remote probability that eating the product will cause serious health problems; or products that could cause temporary, reversible health problems.

Examples for this classification would be product that had pathogenic organisms, such as most *Salmonella* species, *Shigella*, *Staphylococcus aureus*, or indicator organisms such as generic *E. coli*, non-FD&C certified colors and undeclared FD&C Yellow #5 and #6, undeclared sulfites (3.7-9.9 mg per serving), undeclared wheat, oats, or corn, undeclared fish, unapproved additives, undeclared pistachios or almonds, undeclared soy (soybeans, soy protein, and soy flour), and undeclared dairy products (milk, cream, dry milk, whey). Again, depending on the specific situation, amount of product distributed, extent of the product consumed, age, and health of the individuals exposed, other pathogenic organisms may also be considered in this classification.

Class III: eating the product is not likely to cause serious health problems.

Adulterated or misbranded products that do not involve a health hazard would be given this classification. For example, undeclared certified colors (other than Yellow #5 and #6), undeclared sulfites (less than 3.7 mg per serving) and minor labeling problems (e.g. identification of a container as having 14 ounces of a product when in reality it contains only 10 ounces of product).

Any **unclassified and voluntary situation** of product withdrawal in which no violations are involved, or are of such a minor nature, will not place them under FDA guidelines. Examples may include product quality, non-food safety labeling etc.

Section 2 - Traceback Procedure

Notification

The initial notification of a potential health hazard can come from a variety of sources including the FDA, State Health Departments, Proper Beverage, Co.'s customers and Proper Beverage, Co.'s employees, contractors or suppliers (packaging, ingredients, raw materials etc.). In the vast majority of cases, notification of potential foodborne illness or contamination from product in commerce will come from either the FDA or a State Health Department. Regardless of the source, all food safety or health hazard inquiries are routed immediately to the Traceback/Product Recall Coordinator (see Table 1) without exception. Proper Beverage, Co.'s reception is trained to identify these calls and transfer them to the Traceback/Product Recall Coordinator. If the Traceback/Product Recall Coordinator is off site, reception will immediately locate the Traceback/Product Recall Coordinator to apprise him/her of the situation. In those instances when the Traceback/Product Recall Coordinator is unavailable, the alternate Traceback/Product Recall Coordinator (see Table 1) will assume responsibility for addressing the initial notification.

Fact and Data Acquisition

In the initial conversation with the FDA, State Health Department or Proper Beverage, Co.'s customer, contractor or employee, the Traceback/Product Recall Coordinator will ascertain the available facts associated with the potential health hazard. The Customer Contact and Feedback Forms (Figure 3, Figure 7) are used to organize the pertinent facts and create an official record of the issue. Regardless of where the issue originates, the Traceback/Product Recall Coordinator or his/her designate will keep careful, detailed notes of the initial conversation and all subsequent activities associated with the traceback/recall process. The Traceback/Product Recall Coordinator will include in these notations the **time and date of each event** to aid in the preparation of a final report and measure the effectiveness and timeliness of the response. These facts and related information will include **product type and label, product codes, type of defect or health hazard, location(s) involved, invoice numbers, customer(s), number of people affected and their condition**. The Traceback/Product Recall Coordinator will also obtain the name, agency/customer and phone numbers of the person making the notification. A general outline detailing the types of information needed is included in Figure 2. If the notification is coming from the FDA or a State Department of Health, it is important to determine the status of the investigation. Owing to the perishable nature of some products, by the time a state or federal investigation of food safety mobilizes, the product may have moved through the distribution system and been consumed. This situation obviates a product recall but merits swift action to assist the governmental agency in their investigation, so that the cause of the health hazard can be identified and, if found to be a Proper Beverage, Co.'s problem, corrected immediately.

The Traceback/Product Recall Coordinator will also inquire as to whether other products are being investigated as a source of the health hazard and if other companies have been contacted. Often in the initial stages of a food safety or epidemiological study more than one potential source is under consideration. This is especially relevant when dealing with health hazards that trace to restaurants, catering companies or other public food providers. In these cases, cross contamination in the food preparation establishment or contamination by ill food handlers has to be carefully considered.

If the potential health hazard is a physical or chemical rather than biological contamination, i.e. pieces of glass, metal, wood, contamination with petroleum products or other chemical agents, the Traceback/Product Recall Coordinator will attempt to get a sample of the physical hazard to assist in the internal investigation. The sample can be used in tracing the origin of the contamination, determining how the problem arose and developing procedures to mitigate future contamination.

Regardless of the nature of the potential health hazard (physical, chemical or biological), the notification that a potentially widespread health hazard exists and is a concern to the FDA, State Health Department or a customer, will trigger an internal investigation Proper Beverage, Co.'s Traceback/Product Recall Team.

The summary for this phase of the process is as follows:

- Outline of the facts and circumstances related to the potential health hazard.
- Product codes and invoice numbers for product(s) in question.
- Initial evaluation of scope of problem and focus of FDA, State Health Department or customer's ongoing investigative efforts.
- Key contact identification and phone numbers.
- Identification of information needed by investigating agency or customer.

Assemble Traceback/Product Recall Team

The Traceback/Product Recall Coordinator will immediately review the facts and hazard status as determined from the communication with the notifying party. The Traceback/Product Recall Coordinator will then assemble the Traceback/Product Recall Team to inform them of the potential health hazard and to initiate the product trace and accumulate pertinent production, harvesting, cooling, processing, quality, shipping and sales information. Table 1 shows the members of the Traceback/Product Recall team and their alternates. The specific responsibilities for these individuals are outlined in the next section. It is imperative that the Recall Team is composed of individuals who best know their area and product.

The Traceback/Product Recall Coordinator has responsibility for coordinating and managing all aspects of the traceback and recall activity. The Coordinator will keep a log of all actions taken during the traceback/product recall (Figure 9). This log will be used in the preparation of status reports and for measuring the effectiveness of Proper Beverage, Co.'s response. It is understood that each representative on the Traceback/Product Recall Team will use all the personnel and other resources available to them to carry out their responsibilities.

The Traceback/Product Recall Team will trace the product back from the customer to the origin. If possible (based on the time interval from production/distribution to notification of the existence of the problem), an immediate hold will be placed on all suspect products Proper Beverage, Co.'s control. All important documentation will be collected from Production/Sales/Distribution including **invoices, bills of lading, pick tickets, transfers, receiving tags and export documents, customer contact details** (if appropriate). **Supplier details, Inventory listings, production records and harvest schedules** will also be collected. The Traceback/Product Recall Coordinator and the other Team members assemble the necessary documentation and organize it by order. The Team members will also collect pertinent quality control and safety documentation (e.g. GAP, HACCP). Other documents **raw product quality control documents, lot numbers, receiving information, HACCP verification logs and other process control documentation and finished product quality control logs** where relevant will be assembled and evaluated.

The Traceback/Product Recall Coordinator will consider the need for external advice and services e.g. consultants, laboratories, lawyers, public relations/crisis management personnel, etc.

The summary for the initial trace activity is as follows:

- Notification of top management of the potential health hazard.
- Recall Team assembled and knowledgeable of situation
- Hold placed on product that might still be in Proper Beverage, Co.'s control
- Product in question traced to origin.
- Documentation in place to verify origination of product.
- Pertinent QC logs or receiving reports, process control logs, HACCP verification (if appropriate) and GAP audits assembled (if available).
- Outside technical, (e.g. PrimusLabs.com) public relations and legal experts appraised of situation.
- Supplier contact details
- Customer contact details

Traceback Review

The Traceback/Product Recall Coordinator will reassemble the full Traceback/Product Recall Team for a review of the Traceback activity. The review will include the results of the traceback, a summation of the traceback and safety-related documentation and any further communications between the Traceback/Product Recall Coordinator and the investigating agency or customer. This meeting will then move to a discussion and determination of next steps. The issues to be decided include:

- Should current product sales be halted?
- Is a recall, market withdrawal or stock recovery warranted?
- If a recall is necessary, what classification, and what is the appropriate depth of recall?
- If the FDA is not involved at this point, do they need to be notified?
- What further steps does Proper Beverage, Co.'s need to take in its internal investigation?
- Should the corporate insurance carrier be notified?
- What is the message Proper Beverage, Co.'s wishes to convey to the media, customers and employees?

Communications with the media, customers and employees is a critical issue during a food safety or potential health hazard situation. It is important that the message be clear, concise and factual. It is equally important that the company uses a **single spokesperson** so that the message stays consistent.

The summary from this phase will be:

- A summation of the traceback activity
- Traceback documentation from product back to the farm
- A determination if a recall and its depth or other action is warranted.
- A decision to notify the FDA (if appropriate).
- A Proper Beverage, Co.'s position statement to be used for public inquiries and for communication to other Proper Beverage, Co.'s employees
- A priority list for media responses

If A Product Recall Is Not Warranted

A product traceback activity can have a number of different outcomes depending on the nature of the traceback. Some traceback exercises *will not* be followed by a recall activity owing to the highly perishable nature of produce. The following are potential end scenarios of a traceback investigation:

- It is determined that the nature of the potential hazard does not pose a public health risk. An example of this situation might be the detection of a pesticide (due to an inadvertent over-spray) not labeled for that particular product, but which is found in other foods and is at a level not above legal tolerances.
- Epidemiologists cannot unequivocally determine the source of the contamination.
- Proper Beverage, Co.'s product is found not to be the source of the contamination. An example might be the determination of cross-contamination at a restaurant by an ill food handler or from another food type.
- Proper Beverage, Co.'s product may or may not be linked to the contamination, but the time interval between the actual event and notification of Proper Beverage, Co.'s precludes a recall since the perishable nature of a product means the product in question would have already been consumed.

In these instances when a recall is not appropriate, the focus of Proper Beverage, Co.'s efforts will be directed toward assisting investigating government agencies and/or customers in isolating the likely source of the contamination and evaluating mechanisms to prevent further occurrences. The Traceback/Product Recall Coordinator will continue to work with growers, suppliers, customers, vendors and government agencies to establish the likely cause of the problem and develop preventative measures. This activity will culminate in a **final report** that will be reviewed with the full Traceback/Product Recall Team. This report will also outline any changes that need to be made to Proper Beverage, Co.'s food safety program.

Section 3 - Recall Procedure

Recall Procedure

Should circumstances warrant a product recall, an **immediate hold** will be placed on all products that may be potentially contaminated or deemed unsafe. Proper Beverage, Co.'s will clearly label all products still in the company's possession as 'On Hold' and place them in an area of the storage facility where they cannot be mistakenly distributed. The Hold Tags will be dated, state the reason for being on hold and the person responsible for placing the product hold. For product outside the company's possession, Proper Beverage, Co.'s will instruct the customer to isolate the product and clearly label the product as 'On Hold' Proper Beverage, Co.'s will tabulate product on hold and evaluate relative to the total amount of potentially contaminated distributed product. Proper Beverage, Co. will strive to recover as much product as possible. A recalled product inventory log is illustrated in Table 2. The Traceback/Product Recall Team will assist FDA and/or other investigative agencies in obtaining samples for microbial or chemical testing. Proper Beverage, Co.'s employees will be present during sampling. Duplicate samples will be taken and Proper Beverage, Co.'s will engage a certified analytical laboratory (e.g. PrimusLabs.com) to replicate any tests performed in government laboratories.

Product disposal will be supervised by Proper Beverage, Co.'s designates in conjunction with the FDA or appropriate state health departments. The Traceback/Product Recall Team will determine whether to ship the product to a central site for disposal or to dispose of product at multiple sites based on the characteristics of the potential hazard.

Proper Beverage, Co.'s will move quickly to notify appropriate government agencies (FDA and State public health departments) and affected customers. The Traceback/Product Recall Coordinator will notify and liaise with the appropriate regulatory agencies while the sales and marketing representatives on the Traceback/Product Recall Team will notify customers that may have received the contaminated product by telephone. The Proper Beverage, Co.'s caller will note the date, time and name of the person contacted. A form to help guide this telephone call is included as Figure 3. Fax or e-mail using a letter formatted similarly to Figure 4 to follow up all telephone calls. The Traceback/Product Recall Coordinator will keep a copy of this written confirmation letter and the telephone record on file. Additionally, a Status Check Questionnaire (Figure 5) will be sent with the follow up letter. The customer will be asked to fill out this questionnaire as soon as possible and return it to Proper Beverage, Co.'s the data collected from this form will assist Proper Beverage, Co.'s efforts in tracking the product.

Throughout the Recall process, the Traceback/Product Recall Team will:

- Update relevant information pertaining to the traceback and recall
- Analyze incoming information and update the Management of Proper Beverage, Co.'s
- Communicate with customers and Proper Beverage, Co.'s employees regarding the recall status
- Update suppliers and other Proper Beverage, Co.'s business partners regarding the recall activities
- Develop messages and strategy for dealing with public/media concerns
- Assist in product recovery/disposal activities
- Assist FDA or other appropriate public health agencies in the outbreak investigation.

Once the product recall has been concluded and the product in question disposed of, the Traceback/Product Recall Coordinator will prepare a report summarizing the events of the traceback and recall activities. This report will be including an evaluation of the efficiency of Proper Beverage, Co.'s response and recommend any improvements that might be needed.

Figure 1. Product Recall Flow Chart

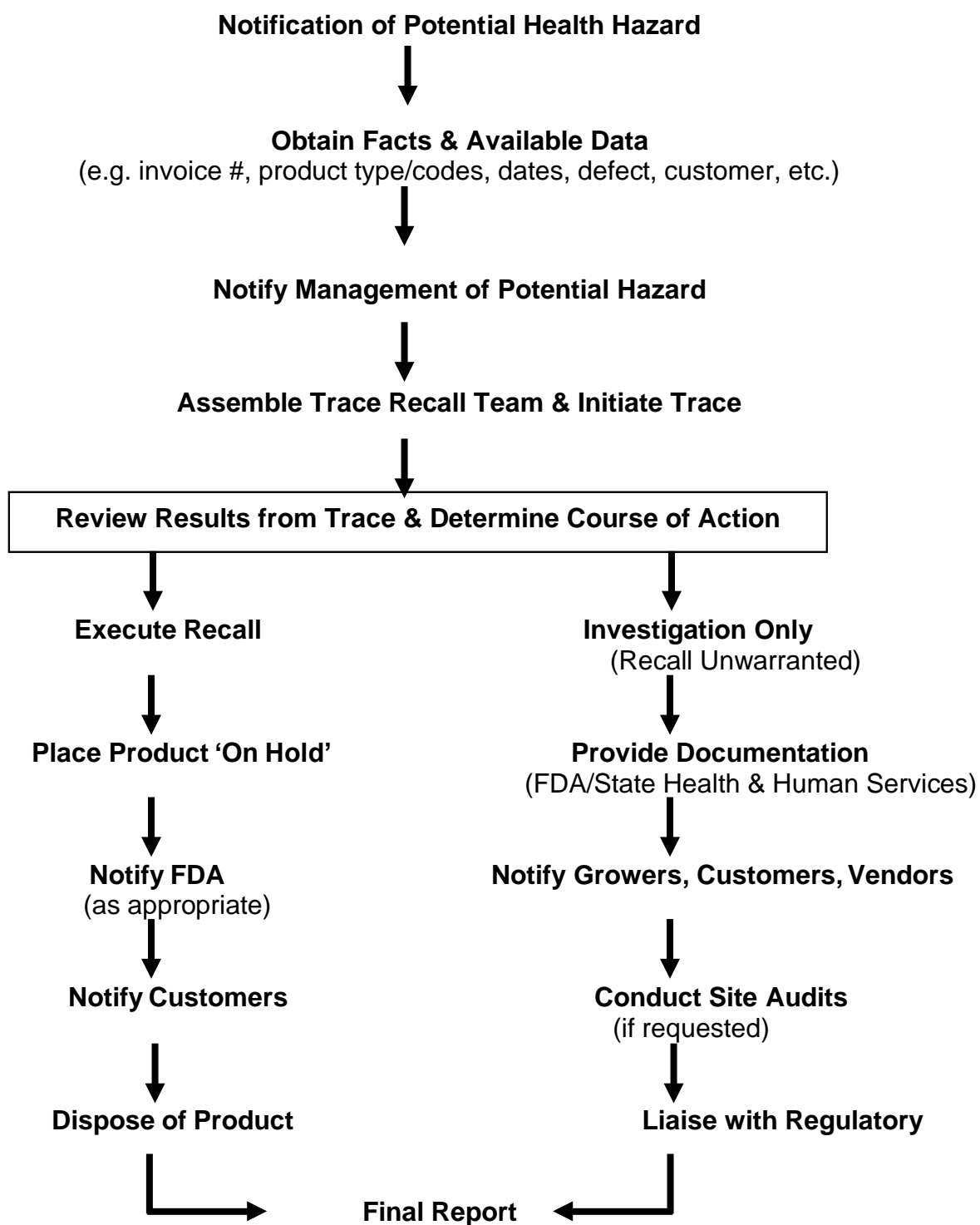
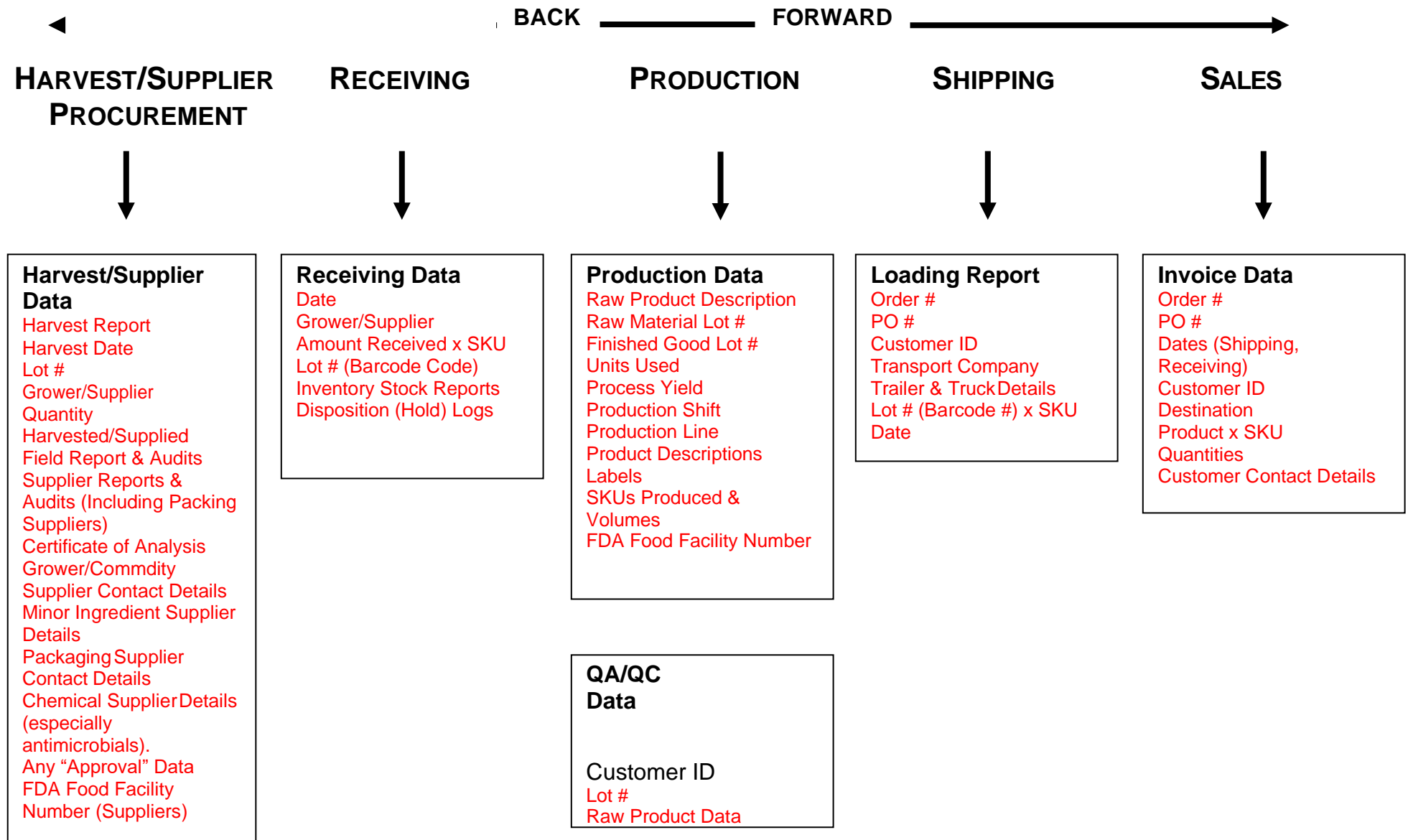


Figure 2. Examples of Data & Documentation Required for Product Traceback & Forward



Section 4 – Individual Responsibilities of Product Traceback/Recall Team

Traceback/Product Recall Coordinator

1. Upon receiving information that a Proper Beverage, Co.'s product may pose a potential health hazard to consumers, or may be defective, the Product Traceback/Recall Coordinator and the Product Traceback/Recall Team will immediately begin investigating the suspected product and the events leading to its suspected status. They will determine if the product(s) is indeed a potential health hazard to the consumer.
2. Informs the Proper Beverage, Co.'s Management immediately, presents all factual data regarding the suspected product, and keeps them informed as events unfold regardless of whether a recall will become necessary or not.
3. Keeps an official record of all activities related to the traceback activity and recall should events move to that level (Figure 8).
4. Obtains and interprets all pertinent data and communicates directly with the Management of the company and all other appropriate individuals on the Traceback/Product Recall Team.
 - Obtains all pertinent production data necessary for the suspected product(s) recall from the Production Manager(s) and Production Supervisor(s).
 - Provides the Shipping/Receiving Manager(s) with the suspected product (s) code date and any other required information necessary for the hold, traceback or recall.
 - Obtains an inventory of the suspected product(s) that may remain at the Proper Beverage, Co.'s cold storage/distribution facilities from the Shipping/Receiving Manager(s) and a complete list of clients who were shipped suspected product(s) from the Production Manager(s), Shipping Manager(s) and/or the Sales Manager(s).
5. Is the primary contact if it becomes necessary to involve the FDA in the product(s) recall? FDA notification of your intent to initiate a product recall includes:
 - Identity of the product involved.
 - Reason for the removal or correction, and the date and circumstances under which the product (s) deficiency or possible deficiency was discovered.
 - Evaluation of the risk associated with the deficiency or possible deficiency.
 - Total amount of suspected product produced and/or times span of the production.
 - Total amount of the suspected product estimated to be in distribution channels.
 - Distribution information, including number of direct accounts and, where necessary, the identity of the direct accounts.
 - A copy of the firm's Recall Communication if any has been issued, or a proposed communication if none has been issued.
 - Proposed strategy for conducting the recall.
 - FDA Food Facility Registration Number (sometimes referred to as the FDA Food Security Registration Number).
 - Name, title and telephone number of the firm official who is to be contacted concerning the recall.
6. Shall prepare recall status reports as well as a final report at the conclusion of the recall process. See Termination of a Recall (21CFR 7.55 (a) & (b)) for these requirements.
7. Provides the Processing Facility/Packhouse Manager, the Shipping/Receiving Manager, Production Supervisor and/or Proper Beverage, Co.'s Accounting with a Purchase order number, code date or lot number of the suspected product(s) and obtains all the pertinent production data necessary for the product(s) recall to the Traceback/Product Recall Coordinator.

Sales Manager

1. Sales department ensures that the customer contact details are both up to date and available to all key members of the recall team. Contact details are either in the recall program file or referred to in the texts of the recall file.
2. Based on purchase orders and the data provided by Shipping/Receiving/Distribution Manager and other appropriate ordering and shipping forms, co-ordinates the sales staff to contact all clients who received shipment of suspected product(s). Informs clients of the Traceback/Recall effort in progress first by telephone (Figure 3) and confirms by the written communication of a Recall Letter (Figure 4) and follows-up with telephone calls verifying the receipt of the recall letter.
3. If the customer is distributing the suspected product(s), Proper Beverage, Co.'s will have the customer utilize the code date and their own appropriate shipping forms to determine the following information, and perform the following tasks as quickly and accurately as possible:
 - The current location(s) and total volume (cases, pallets, etc.) of all suspected product(s) within the client's cold storage, dry storage and distribution center(s).
 - The total volume (cases) of suspected product(s) shipped and a list of affected clients.
 - The individual total volume (cases) of suspected product(s) shipped to each client.
 - Have the client(s) cease all further distribution of the suspected product(s).
 - Have the client(s) gather together and isolate all suspected product within their cold holding facility
 - Work out the necessary arrangement with the client(s) to return suspected product(s) to Proper Beverage, Co.'s or dispose of it in an appropriate manner. If the decision is made to dispose of the suspected product(s), Proper Beverage, Co.'s must send a representative of the company to verify the appropriate disposal of the product. Photographic evidence thereof, or photos and landfill receipts provided by the client shall evidence and verify the appropriate disposal of the suspected product(s).
4. If the customer is ***not*** distributing the suspected product(s), Proper Beverage, Co.'s will have the client utilize the code date and/or purchase order and their own appropriate receiving forms to determine the following information and perform the following tasks as quickly and as accurately as possible.
 - The current location(s) and total volume (cases, pallets, etc.) of all suspected product(s) within the client's store(s).
 - The total volume (cases) of suspected product(s) sold at consumer level.
 - Have the client(s) cease all further distributing and use of the suspected product(s).
 - Have the client gather together and isolate all suspected product(s) within their store(s) and tag it, "Hold - Do Not Use."
 - Work out the necessary arrangements with the client to return the suspected product(s) to Proper Beverage, Co.'s or dispose of it in an appropriate manner. Once the decision is made to dispose of the suspected product(s), Proper Beverage, Co.'s will send a representative from the company to verify the appropriate disposal of the product. Photographic evidence thereof, or photos and landfill receipts provided by the client shall evidence and verify the appropriate disposal of the suspected product(s).
5. Provides the information gathered to the Traceback/Product recall Coordinator as it is retrieved.
6. Recall effectiveness checks may be carried out by telephone calls, facsimile transmissions, or personal visits as often as is necessary to accomplish their intended purpose (note that this is not mandated when performing mock recalls). The objective of the follow-up is to

verify that all the consignees are taking the appropriate actions and that all, or as much as is humanly possible, of the suspected product(s) has been accounted for.

Distribution/Shipping Manager

1. Utilizing the code date, purchase orders and the appropriate shipping forms, determines the following information as quickly and as accurately as possible:
 - The current location(s) and total volume (cases) of all suspected product(s) within Proper Beverage, Co.'s cooler/distribution facilities.
 - The total volume (cases) of suspected product(s) shipped to each client based on packing lists and bills of lading.
2. Has all suspected product(s) within Proper Beverage, Co.'s distribution facilities gathered together, isolated and then tagged, "Hold - Do not Ship." Any suspected raw materials also be placed on hold.
3. Provides the information gathered to the Traceback/Product Recall Coordinator as it is retrieved.

Production Manager(s) And Production Supervisor(s)

1. Utilizing the code date of the suspected product(s) and appropriate production forms, obtains all the pertinent production data necessary as quickly and as accurately as possible for the Traceback/Product Recall Coordinator.
 - The time period, day(s) during which the suspected product(s) was processed and/or packed.
 - The raw material affected lot(s) (which leads to location(s), suppliers, grower, ranch(es) and production block(s)).
 - The total volume of finished product cases manufactured (and recorded wastage and work in progress if applicable).
 - Process data, HACCP verification logs, sanitation logs, raw and finished product QC evaluations, production shift, trans-shipment information.
 - Any special orders, their total and individual finished product volumes (cases), and the lot(s).
 - The different types of cases and case sizes and identification markings utilized and their individual finished product volumes (cases, pallets, etc.).
 - All pertinent product codes/use by dates used and affected labels.

Provides the information gathered to the Traceback/Product Recall Coordinator as it is retrieved.

Quality Control Supervisor

1. Assists the Processing Plant/Packinghouse Manager with the gathering of Quality Control data:
 - Incoming raw material and final product QC evaluations
 - Process control (monitoring) data/logs (e.g. pH, chlorine or ORP, temperature, etc.)
 - Transfer dates, timing, etc.

Receiving

1. Utilizing the delivery notes, delivery tags, harvest reports and computerized data gathering, determines the following information as quickly and as accurately as possible:

- The current location(s) and total volume (cases) of all suspected product(s) within Proper Beverage, Co.'s cooler/distribution facilities.
 - The total volume (cases) of suspected product(s) already passed onto the production department (or to shipping if production is not involved, e.g. cross docked, field packed product).
2. Any suspected raw materials are also be placed on hold.
 3. Provides the information gathered to the Traceback/Product Recall Coordinator as it is retrieved.

Procurement/Buyer Manager

1. Maintains and can access the following records as quickly as possible:
 - Up-to-date contact details of all suppliers that are used for raw materials including, commodities, ingredients, chemicals and packaging materials.
 - Records that show any supplier approval system documentation (letters of guarantee, certificates of analysis, third party audit information and contracts).
 - An inventory of goods received, any off-site storage.
2. Informs supplier(s) of their involvement in a recall process.
3. Provides assistance and advice if the recall issue is traced back to the raw materials that are used to produce the products.
4. Is the contact point for the supplier(s), if the supplier is the point of origin for a recall (i.e. a trace forward recall)?

Provides the information gathered to the Traceback/Product Recall Coordinator as it is retrieved.

Management

1. The Proper Beverage, Co.'s Management bears the ultimate responsibility for determining the necessity for a product recall. This decision to be made with the input of the Traceback/Product Recall Team and legal counsel. Upon being informed that a Proper Beverage, Co.'s product poses a potential health hazard to consumers, the Management of the company will work directly with the Traceback/Product Recall Team to determine the necessity for a product(s) recall, its interim classification and depth.
2. Instructs the Traceback/Product Recall Coordinator to initiate a recall.
3. Maintains contact with legal counsel throughout the recall process.
4. Works with legal counsel, the Team and the PR firm to develop press releases/public statements.



Table 1. Traceback/Product Recall Team Contact Information

Traceback/ Product Recall Coordinator Name: Larry Griesbach Office Phone Number: 616-820-0328 Cellular: 616-414-2463	Alternate: Traceback/Product Recall Coordinator Name: Kevin Clement Office Phone Number: 616-820-0328 Cellular: 248-974-4008
Sales Name: Brian Hirsch Office Phone Number: 616-820-0328 Cellular: 414-731-1663	Alternate: Sales Name: Kevin Clement Office Phone Number: 616-820-0328 Cellular: 248-974-4008
Shipping/Receiving Name: Andrew Vredevelt Office Phone Number: 616-820-0328 Cellular: 616-826-2244	Alternate: Shipping/Receiving Name: Larry Griesbach Office Phone Number: 616-820-0328 Cellular: 616-414-2463
Production Name: Cody VanNoord Office Phone Number: 616-820-0328 Cellular: 616-745-5440	Alternate: Production Name: Andrew Vredevelt Office Phone Number: 616-820-0328 Cellular: 616-826-2244
QA (if different from Recall Coordinator) Name: Dylan Lucas Office Phone Number: 616-820-0328	Alternate QA Name: Cody VanNoord Office Phone Number: 616-820-0328 Cellular: 616-745-5440
Procurement Name: Brian Hirsch Office Phone Number: 616-820-0328 Cellular: 414-731-1663	Alternate: Procurement Name: Kevin Clement Office Phone Number: 616-820-0328 Cellular: 248-974-4008
Legal Name: CBH Attorneys & Counselors Office Phone Number: 616-608-3061	Alternate: Other Name: Mitch Iwan Office Phone Number: 773-821-1943 Cellular: 616-218-3378
:	
Third Party Auditor Name: SQF Office Phone Number: 877-277-2635	
MDARD Name: Casey Wagner Office Phone Number : 616-558-4614	POLICE DEPARTMENT Name: Ottawa County Sheriff Office Phone Number: 616-738-4000 Cellular: 911

FIRE DEPARTMENT

Name: Hudsonville Fire Department
Office Phone Number: 616-669-0200
Cellular: 911

Section 5 - Model Forms

Figure 3. Customer Contact Form Example

Customer Contact Form

Telephone or Personal Visit (circle one)

Date: _____

Time: _____ a.m. / p.m.

Contact Name: _____

Title: _____

Company: _____

Subject: **Product Hold and/or Recall Notification via Telephone or Personal Visit**

This is (Name of Marketing/Sales Interviewer) with Proper Beverage, Co.'s. I am calling to notify you have that we are requesting that you isolate and hold (product name and description, including the code date). We are calling all of our customers that might have received (product name and code date). We currently believe that this product may represent a public health hazard. We believe the product [ISSUE] (e.g. may have an illegal pesticide residue [NAME], be contaminated with a pathogenic microorganism [NAME], etc.). Please clearly mark the product as on hold and do not distribute this product under any circumstances Proper Beverage, Co.'s will contact you within the next few days with further information regarding compensation for the product and whether to return the product to Proper Beverage, Co.'s or to an alternative site for disposal. If you will allow me, I have a few questions to ask you regarding this product hold and/or recall.

1. Did your firm receive shipments of the product being recalled (If the answer is **NO**, terminate the questioning and go to the closing statement)?

☐

Yes

☐

No

2. Do you have any of the recalled products on hand? Please check your inventories before answering. This is very important.

☐

Yes

☐

No

3. How much product do you have in inventory? _____

4. If the answer to question 2 is **YES**, do you intend to return the product to Proper Beverage, Co.'s if requested?

☐

Yes

☐

No

5. If the answer to question 4 is **NO**, please explain your intentions: _____

6. Have you received any reports of illness or injury related to this product? If the answer to question 6 is **YES**, please provide details.

☐

Yes

☐

No

Thank you for your cooperation in this matter. We will follow up this telephone conversation with a written notification and a Status Questionnaire. Please fill out the Questionnaire and return it to Proper Beverage, Co.'s as soon as possible. Instructions are provided with the Questionnaire.

We will be back in touch with you as soon as possible with information regarding the disposition of the product. If you have any questions, please give us a call.

Name of Proper Beverage, Co.'s caller,

Figure 4. Recall Communication Letter Example

Recall Communication Letter

Date: _____

Customer Name: _____

Title: _____

Address: _____

Email (or Fax): _____

Attn: *Customer Name*

Proper Beverage, Co.'s is voluntarily recalling (*product name*), (*container size*), etc. Enclosed is a copy of the original customer invoice, listing the quantity of product shipped to you on (*date*), the product label _____ and the code date _____ which is located _____ on the package (box).

The voluntary recall is being initiated following the discovery of [*ISSUE*] (e.g. *detection of an unregistered pesticide, [NAME] by our pesticide residue analysis-testing program/a potentially pathogenic microorganism, [NAME] by our microbial screening program*) in our [*PRODUCT NAME AND DESCRIPTION*]. Our concern is that your company has received, or may have received, similarly contaminated product. Consumption of this product by consumers represents a potential health hazard.

Proper Beverage, Co.'s requests all consignees (wholesalers and retailers) to hold and discontinue selling their existing stock of this product. Please contact *Proper Beverage, Co.'s* at (*telephone #*) and ask for *CONTACT NAME* for instructions regarding returning or destroying any remaining inventories of the recalled products you may have. If you have redistributed or sold this product to other retailers, please notify your clients as to the status of this product and whom they may contact for further information at *Proper Beverage, Co.'s*.

Enclosed is a recall effectiveness questionnaire. We are requesting that you complete it promptly and return the questionnaire by fax transmission (*fax #*) or scan and e-mail to (*e-mail address*). If you have any questions regarding this request, please call *CONTACT NAME (phone#)*.

Thank you for your cooperation in this matter.

Sincerely,

NAME
TITLE

Figure 5. Status Check Questionnaire Example

Status Check Questionnaire

E-mail or Fax Transmission (circle one)

Date: _____

To: (Name, Title and Company)

From: _____ (Name), Proper Beverage, Co.'s

Subject: **Recall Effectiveness Check**

E-mail / Fax: _____

Proper Beverage, Co.'s **Product Recall**

Please read each question, check the appropriate answer, and return immediately.

1. Did your firm receive notification that Proper Beverage, Co.'s is requesting a product hold and/or recalling its (product name and description) product?

☐ Yes ☐ No
2. Who contacted your firm and when? _____
3. Did your firm receive shipments of the product being placed on hold and/or recalled?

☐ Yes ☐ No
4. Do you now have any of the recalled products on hand? Please check your inventories before answering. This is very important.

☐ Yes ☐ No
5. If the answer to question 4 is **YES**, do you intend to return the product to Proper Beverage, Co.'s if so requested?

☐ Yes ☐ No
6. If the answer to question 5 is **NO**, please explain your intentions _____
7. How much of this product do you currently have on hand? _____
8. Have you distributed this product to any of your customers?

☐ Yes ☐ No
9. If the answer to question 8 is YES, to whom (*name, address, telephone*) and how much? _____
10. Have received any reports of illness or injury related to this product?

☐ Yes ☐ No
11. If the answer to question 7 is **YES**, please provide details: _____
12. Name and title of the person completing this questionnaire.

Return Immediately To:

Proper Beverage, Co.'s

E-mail: NAME@YOUR COMPANY NAME.com

PHONE:

Figure 6. Media Request Form Example

Media Request Form

This form is to be used in the event that a member of the news media requests an interview via telephone, facsimile, e-mail or in person. This information is then be transmitted to *NAME and/or ALTERNATE NAME* for review **prior** to granting the interview. *NAME (Media Firm)* will review the request; research the author with regard to their history/experience in covering food safety issues and provide direction prior to conducting the interview.

Date: _____

Time: _____

Proper Beverage, Co.'s Employee Contacted: _____

Person Requesting Information: _____

Organization Represented: _____

Deadline: _____

Type (*e.g. newspaper, radio, television, trade publication, magazine, etc.*):

How is the interview to take place? _____

Is background information required? _____

General (*e.g. scope of article, angle, etc.*):

Forward to:

NAME
MEDIA FIRM
Telephone:
Fax:

Figure 7. Customer Feedback Form Example

Customer Feedback Form

Date/Time of Feedback: _____

Feedback From: _____

Address: _____

Telephone Number: _____

Product Description: _____

Where was product purchased? _____

Amount of Product Involved: _____

Product Code/Date: _____

Issue: _____

Call Back Needed: ☐ **Yes** ☐ **No** Date: _____

Actions: ☐ **Letter** ☐ **Notify Managers**
 ☐ **Money Back** ☐ **Investigate**
 ☐ **Coupons**

Managers' Notified: _____

Investigative Findings/Comments:

Action taken to correct issue and to prevent its recurrence:

Signature: _____ **Date:** _____

Figure 8. Traceback/Product Recall Information Form Example

Traceback/Product Recall Information Form

Date/time of notification or complaint: _____

Notification or complaint made by: _____

Telephone number/fax/e-mail of contact: _____

Agency or Proper Beverage, Co.'s: _____

Address: _____

Product description/label: _____

Date(s) of occurrence? _____

Purchase Order/Invoice Number(s): _____

Product Code(s) or Use by Date(s): _____

Amount of product involved: _____

Type of health hazard: _____ Sample (physical/chemical) _____

Number of people affected/condition? _____

Location(s): _____

Current status of Agency investigation: _____

Are other products/grower/shippers involved? _____

If so, what/who? _____

Are food handlers or other cross contamination points considered? _____

Are other agencies/companies involved? Who? _____

What action does the Agency/Company recommend? _____

Signature: _____

Figure 9. Traceback/Product Recall Action Log Example

Traceback/Product Recall Action Log

Activity:____Traceback:_____Trace/Recall:_____Mock Recall:_____Mock Traceback:_____

Where applicable Class of Recall (I, II or III): _____

Date:_____Time of Notification/Initiation: _____

Summary of Situation:

Product(s):_____Code(s): _____

Date	Time	Who	Action Taken

Signature:_____Date:_____

TRACE /RECALL PROGRAM EXAMPLE

Table 2. Product Recall Inventory Log

Customer	Product(s)	Ship Dates	Product Code(s)	Invoice Numbers	Total Boxes Shipped	Total Boxes Received	Total Boxes on Hold
TOTAL							

Mock Recall Summary Form

Mock Recall Initiation Date: _____ Start Time: _____ Finish Time: _____

Product(s) Involved: _____

Shipping Product Code(s) that started the issue: _____ Class of Recall: _____

Personnel Involved: _____

Mock Scenario Description (include cause for the mock recall and where the mock recall originated):

Time taken to discover where the affected product might have been sent: _____

Product Shipping Consolidation	Result Comments
Amount of product shipped	
Amount of product still in inventory	
Amount of product produced	
Amount of product not accounted for	
<i>Where relevant, culls and byproducts sent for further processing into human food and animal feed might need accounting for.</i>	

Lessons learned from the Mock Recall:

Notes:

- 1) ***Attach to the mock recall, copies of records that prove the trace back or trace forward from the given scenario or actual event information leading to which customers and/or suppliers are involved (depending on scenario). Refer to Figure 2.***
- 2) ***Ensure that all key documents used in a mock recall state "Mock Recall" on them, so that no party ever considers these to be documents for a real recall.***
- 3) ***Do not call customers or suppliers when carrying out mock recalls unless they have offered this service. Usually take the mock recall as far as proving that the contact details are on file.***
- 4) ***Choose mock scenarios that are realistic, challenging and vary the mock scenario so that over time the range of products, sources and issues covered test the system in as many ways as possible.***

Proper Soda Company

Jenison, MI

Date Modified

August 1, 2020

Date Created

August 1, 2020

Procedure Number

Sanitation Standard Operating Procedure

Product System - Passivation CIP

Product	Concentration
Microlox Special 70 LF	24gallons per 100 gallons of water

Product	Special Precautions
Microlox Special 70 LF	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with caustic or chlorine solutions.

Product	Test Kits
Microlox Special 70 LF	Acid

Safety Equipment				
Product	Eye Protection	Apron/ Rainsuit	Gloves	Respirator
Microlox Special 70 LF	Yes	Yes	Yes	refer to Section 8 on SDS

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Larry Griesbach

616-610-6174

Modified By

Proper Soda

Corporate Office:(800) 366-2477

Corporate FAX:(320) 693-8238

Instructions

Responsible - Trained Employees

Frequency - Initial start-up, after maintenance and as needed.

Prior to cleaning;

Prior to any cleaning in this area please remove any items that cannot get wet, this includes cardboard, wash, packaging supplies and product. If there are any electrical items that cannot get wet they will need to be covered with plastic.

Procedure for: **Product System - Passivation CIP**

Caution:

When handling nitric acid, extreme care must be taken. This solution, may be detrimental to certain gasket material, floors, tile, grouting, or materials other than stainless steel. Operators must wear protective clothing, rubber gloves, and eye protection (goggles and face shield). If the nitric acid solution gets on the skin, clothing, etc., immediately wash with copious amounts of clean running water. Seek medical attention. Failure to do so may result in severe chemical burns.

Passivate;

Prior to passivation on the equipment it must be cleaned using the "wash" step of the "Product tank CIP" cleaning procedure.

Passivation (By CIP Only):

- Fill the product tank with 150 gallons of water.
- Add 24 gallons of **Microlox Special 70 LF**. Re-circulate this solution for 40 to 45 minutes at 145-150°F.
- Rinse with fresh water until a neutral PH is received in the discharge.

The equipment, including piping, needs to air dry and time to sit idle while dry. The minimum time needed is 8 hours after the equipment is dry. Equipment can be assisted in drying by an air blow after initial draining or dumpdown. The equipment must have the proper dry time in order for the passive chromium oxide and nickel oxide layers to form.

Clean;

- After the system has had time to completely dry the system must be cleaned using the "Product tank CIP" cleaning procedure. It is then ready for normal production

Proper Soda Company

Jenison, MI

Date Modified **August 3, 2020**

Date Created **August 1, 2020**

Procedure Number

Sanitation Standard Operating Procedure

Product Tanks CIP

Product	Concentration
Super Alk HD	2-4ozs per gallon of water
Tec-An OX-50	12-24ozs per 100 gallons of water
San-Tec 6	1-6.1ozs per 6 gallons of water or 82-500ppm

Product	Test Kits
Super Alk HD	Alkaline
Tec-An OX-50	Acid
San-Tec 6	Acid

Safety Equipment				
Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Super Alk HD	Yes	Yes	Yes	refer to Section 8 on SDS
Tec-An OX-50	Yes	Yes	Yes	refer to Section 8 on SDS
San-Tec 6	Yes	Yes	Yes	refer to Section 8 on SDS

Product	Special Precautions
Super Alk HD	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with acids.
Tec-An OX-50	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management.
San-Tec 6	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with chlorinated solutions. Avoid breathing vapors.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Larry Griesbach

Modified By

Proper Soda

616-610-6174

Corporate Office:(800) 366-2477

Corporate FAX:(320) 693-8238

Instructions

Responsible - Trained Employees

Frequency - Between products or at least once every 24 hours.

Prior to cleaning;

Prior to any cleaning in this area please remove any items that cannot get wet, this includes cardboard, trash, packaging supplies and product. If there are any electrical items that cannot get wet they will need to be covered with plastic.

Procedure for: **Product Tanks CIP**

Rinse;

- Once production is done rinse the product tank with fresh water until all visible food residue is removed. Drain the system.

Wash;

- Fill the product tank with 75 gallons of fresh water.
- Add 2.5 gallons of **Super Alk HD** to the product tank
- Add 24 ounces of **Tec-An OX-50** to the product tank.
- Please add both of these products to the water in the product tank ensuring that the 2 chemicals are mixed together without water. Solution can handle temperatures to 130 degrees and should be heated to that temperature if available.
- Turn on re-circulation and allow to run for 25-35 minutes.
- After 35 minutes drain the system.

Rinse;

- Once production is done rinse the product tank with fresh water until a neutral PH is achieved in the discharge water.

Sanitize;

- Fill the product tank with 75 gallons of fresh water.
- Add 7.5-10 ounces of **San Tec 6** to the product tank.
- Turn on re-circulation and allow to run for 5 minutes.
- After 5 minutes drain the system.
- **San Tec 6** is a no rinse product so the system can be left alone until it is dry. If it is needed for production right away it can be rinsed after 60 seconds and used for production.

Proper Soda Company

Jenison, MI

Date Modified

August 3, 2020

Date Created

August 1, 2020

Procedure Number

Sanitation Standard Operating Procedure

Product Tanks - Exterior Cleaning

Product	Concentration
Superlox X-40	4-8ozs per gallon of water
San-Tec 6	1-6.1 ozs per 6 gallons of water or 82-500ppm

Product	Test Kits
Superlox X-40	Acid
San-Tec 6	Acid

Safety Equipment				
Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Superlox X-40	Yes	Yes	Yes	refer to Section 8 on SDS
San-Tec 6	Yes	Yes	Yes	refer to Section 8 on SDS

Product	Special Precautions
Superlox X-40	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with caustic or chlorine solutions.
San-Tec 6	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with chlorinated solutions. Avoid breathing vapors.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Larry Griesbach

Modified By

Corporate Office:(800) 366-2477

Corporate FAX:(320) 693-8238

Instructions

Responsible - Trained Employees

Frequency - At least once every 24 hours.

Prior to cleaning;

Prior to any cleaning in this area please remove any items that cannot get wet, this includes cardboard, trash, packaging supplies and product. If there are any electrical items that cannot get wet they will need to be covered with plastic.

Procedure for: **Product Tanks - Exterior Cleaning**

Rinse;

- Rinse the product tank with fresh water until all visible food residue is removed. When rinsing start at the top and work your way down

Wash;

- Using the wall mounted foam generator apply **Superlox X-40** to all surfaces of the tank. When applying the foam start at the bottom and work your way up ensuring all surfaces are covered. Allow the foam to work for 5-10 but do not allow it to dry, if it should dry a second coat will need to be applied for removal.

Rinse;

- After 5-10 minutes rinse the tank with fresh water removing all the chemical residue. When rinsing start at the top and work your way down.

Sanitize;

- Using the wall mounted generator apply **San Tec 6** to the tank. This product is a spray and does not foam, when applying start at the bottom and work your way up. **San Tec 6** is a no rinse product so it can be left alone until it is dry.

Proper Soda Company

Jenison, MI

Date Modified

August 3, 2020

Date Created

August 3, 2020

Procedure Number

Sanitation Standard Operating Procedure Production Room Drains

Product	Concentration
Superlox X-40	4-8ozs per gallon of water
San-Tec 6	1-6.1ozs per 6 gallons of water or 82-500ppm
Sterilex Ultra Step	Ready to use

Product	Test Kits
Superlox X-40	Acid
San-Tec 6	Acid
Sterilex Ultra Step	Alkaline

Safety Equipment				
Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Superlox X-40	Yes	Yes	Yes	refer to Section 8 on SDS
San-Tec 6	Yes	Yes	Yes	refer to Section 8 on SDS
Sterilex Ultra Step	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Superlox X-40	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with caustic or chlorine solutions.
San-Tec 6	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with chlorinated solutions. Avoid breathing vapors.
Sterilex Ultra Step	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with acid, foodstuffs or combustible substances.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Larry Griesbach

616-610-6174

Modified By

Proper Soda

Corporate Office:(800) 366-2477

Corporate FAX:(320) 693-8238

Instructions

Responsible - Trained Employees

Frequency - At least once every 24 hours.

Prior to cleaning;

Prior to any cleaning in this area please remove any items that cannot get wet, this includes cardboard, trash, packaging supplies and product. If there are any electrical items that cannot get wet they will need to be covered with plastic.

Procedure for: **Production Room Drains**

Rinse;

- Rinse the drain with fresh water until all visible food residue is removed. If grain grates are removable they should be removed for proper rinsing.

Wash;

- Using the wall mounted foam generator apply **Superlox X-40** to all surfaces of the drains and grates. Allow the foam to work for 5-10 but do not allow it to dry, if it should dry a second coat will need to be applied for removal.

Rinse;

- After 5-10 minutes rinse the drain and grates with fresh water removing all the chemical residue.

Sanitize;

- Using the wall mounted generator apply **San Tec 6** to the drain and grates. This product is a spray and does not foam. **San Tec 6** is a no rinse product so it can be left alone until it is dry.

Note;

- When disposing of used **Sterilex Ultra Step** pour it into the drain and rinse. This will help eliminate pathogens and contaminants from growing in the drain pipe.

Proper Soda Company

Jenison, MI

Date Modified

August 1, 2020

Date Created

August 1, 2020

Procedure Number

Sanitation Standard Operating Procedure

Sterilex Ultra Step - Doorway Treatment

Product	Concentration
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Sterilex Ultra Step	Ready to use
---------------------	--------------

Product	Test Kits
---------	-----------

Sterilex Ultra Step	N/A
---------------------	-----

Safety Equipment

Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Sterilex Ultra Step	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
---------	---------------------

Sterilex Ultra Step	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix with acid, foodstuffs or combustible substances.
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Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Larry Griesbach

616-610-6174

Modified By

Proper Soda

Corporate Office:(800) 366-2477

Corporate FAX:(320) 693-8238

Instructions

Man Doors;

- Doors that are walk through doors should have a single mat placed in front of them as close to the entrance of production as possible without allowing people to walk around them. If carpet is available the mat should be placed at the end of the carpet to allow excess moisture to be removed from shoes to avoid clumping in the mats.

- Mats should be filled with **Sterilex Ultra Step** so that the fingers on the bottom of the mat are not visible. Mats should be monitored regularly to ensure the product level does not drop below this point and that the product in the mat does not become heavily soiled. If the product level should drop please add more, for heavily soiled product remove the product and replace with fresh **Sterilex Ultra Step**.

Procedure for: **Sterilex Ultra Step - Doorway Treatment**

Forklift Doors;

- For the forklift doors *Sterilex Ultra Step* should be spread on the floor to ensure full coverage of these doors. The powder should be spread wide enough to ensure a full tire rotation from the forklift.

Clean Up;

Any *Sterilex Ultra Step* that is to be disposed of should be via the drain system as this will help with the contamination in the drains.

Proper Soda Company

Jenison, MI

Date Modified

August 3, 2020

Date Created

August 1, 2020

Procedure Number

Sanitation Standard Operating Procedure Restrooms, Break Room and Office Areas

Product	Concentration
Defend	0.5ozs per 32oz spray bottle
Bio Clean	2-4ozs per gallon of water
Brilliant	1.5ozs per 32oz spray bottle

Product	Test Kits
Defend	Quat
Bio Clean	N/A
Brilliant	N/A

Safety Equipment				
Product	Eye Protection	Apron/ Rainsuit	Gloves	Respirator
Defend	Yes	No	Yes	refer to Section 8 on SDS
Bio Clean	Yes	No	Yes	refer to Section 8 on SDS
Brilliant	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Defend	Causes irritation (possibly severe), burns to the eyes. May cause skin irritation. May irritate the respiratory tract. Avoid contact with skin and eyes.
Bio Clean	May cause skin and eye irritation. Wear appropriate personal protective equipment when handling this product as determined by management.
Brilliant	May cause skin and eye irritation. Wear appropriate personal protective equipment when handling this product as determined by management.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Larry Griesbach

616-610-6174

Modified By

Proper Soda

Corporate Office:(800) 366-2477

Corporate FAX:(320) 693-8238

Instructions

- Fill a spray bottle from the dispensing unit with **Defend**. Clean all surfaces except glass and floors with **Defend** using the spray and wipe method.
- Fill a spray bottle from the dispensing unit with **Brilliant**. Clean all glass and mirrors with **Brilliant** using the spray and wipe method.

Fill the mop bucket from the dispensing unit with **Bio Clean**. Clean the floors with **Bio Clean** by mopping or hand wiping.

Proper Soda

Jenison, MI

Date Modified **April 14, 2021**

Date Created **April 4, 2021**

Procedure Number

Sanitation Standard Operating Procedure

Floor Scrubber

Product	Concentration
Rub Out	1-2ozs per gallon of water

Product	Special Precautions
Rub Out	Corrosive! Causes severe burns. Avoid contact with skin, eyes, clothing, mucous membranes. Wear appropriate personal protective equipment when handling this product as determined by management. Do not mix

Product	Test Kits
Rub Out	Alkaline

Safety Equipment				
Product	Eye Protection	Apron/ Rainsuit	Gloves	Respirator
Rub Out	Yes	Yes	Yes	NO

Please refer to MSDS for further safety information.

Service Representative
Ethan Wiskur

Modified By

24 Hour Emergency Telephone Number
CHEM-TREC (800) 424-9300

Corporate Office: (800) 366-2477
Corporate FAX: (320) 693-8238

Home Phone:

Instructions

1. Sweep floor to remove any trash or loose debris.
2. Add **Rub Out** at a concentration of 1-2ozs per gallon of water to the floor scrubber.
3. Use the floor scrubber to scrub the floors.

Proper Soda

Hudsonville, MI

Date Modified

April 15, 2021

Date Created

April 4, 2021

Procedure Number

Sanitation Standard Operating Procedure

General Cleaning

Product	Concentration
Defy	1.5ozs per quart of water
Sani Quik	0.5ozs per quart of water

Product	Test Kits
Defy	Acid
Sani Quik	Quat

Safety Equipment				
Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Defy	Yes	No	Yes	refer to Section 8 on SDS
Sani Quik	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Defy	Contact with eyes will cause severe irritation. Prolonged or repeated exposure will irritate the skin. May irritate upper respiratory tract. Avoid contact with skin and eyes.
Sani Quik	Causes irritation (possibly severe), burns to the eyes. May cause skin irritation. May irritate the respiratory tract. Avoid contact with skin and eyes.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Modified By

Ethan Wiskur

Corporate Office: (800) 366-2477

Corporate FAX: (320) 693-8238

Instructions

- Fill a quart spray bottle from the dispensing unit with **Defy**. Clean surfaces with **Defy** using the spray and wipe method for general cleaning purposes.
- Fill a quart spray bottle from the dispensing unit with **Sani-Quik** to prepare a 200ppm active quaternary solution. This product is a no rinse sanitizer. Spray **Sani-Quik** on cleaning surfaces and let air dry.

Proper Soda

Hudsonville, MI

Date Modified

April 15, 2021

Date Created

April 4, 2021

Procedure Number

Sanitation Standard Operating Procedure

Walls, Ceilings, Lights

Product	Concentration
Defy	1.5ozs per quart of water
Sani Quik	0.5ozs per quart of water

Product	Test Kits
Defy	Acid
Sani Quik	Quat

Safety Equipment				
Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Defy	Yes	No	Yes	refer to Section 8 on SDS
Sani Quik	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Defy	Contact with eyes will cause severe irritation. Prolonged or repeated exposure will irritate the skin. May irritate upper respiratory tract. Avoid contact with skin and eyes.
Sani Quik	Causes irritation (possibly severe), burns to the eyes. May cause skin irritation. May irritate the respiratory tract. Avoid contact with skin and eyes.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Modified By

Ethan Wiskur

Corporate Office: (800) 366-2477

Corporate FAX: (320) 693-8238

Instructions

- Fill a quart spray bottle from the dispensing unit with **Defy**. Clean wall, ceiling, and light surfaces with **Defy** using the spray and wipe method.
- Fill a quart spray bottle from the dispensing unit with **Sani-Quik** to prepare a 200ppm active quaternary solution. This product is a no rinse sanitizer. Spray **Sani-Quik** on wall, ceiling, and light surfaces and let air dry.

Proper Soda

Hudsonville, MI

Date Modified

April 15, 2021

Date Created

April 4, 2021

Procedure Number

Sanitation Standard Operating Procedure

Depalletizer

Product	Concentration
Defy	1.5ozs per quart of water
Sani Quik	0.5ozs per quart of water

Product	Test Kits
Defy	Acid
Sani Quik	Quat

Safety Equipment				
Product	Eye Protection	Apron/ Rainsuit	Gloves	Respirator
Defy	Yes	No	Yes	refer to Section 8 on SDS
Sani Quik	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Defy	Contact with eyes will cause severe irritation. Prolonged or repeated exposure will irritate the skin. May irritate upper respiratory tract. Avoid contact with skin and eyes.
Sani Quik	Causes irritation (possibly severe), burns to the eyes. May cause skin irritation. May irritate the respiratory tract. Avoid contact with skin and eyes.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Modified By

Ethan Wiskur

Corporate Office: (800) 366-2477

Corporate FAX: (320) 693-8238

Instructions

- Fill a quart spray bottle from the dispensing unit with **Defy**. Clean depalletizer surfaces with **Defy** using the spray and wipe method.

- Fill a quart spray bottle from the dispensing unit with **Sani-Quik** to prepare a 200ppm active quaternary solution. This product is a no rinse sanitizer. Spray **Sani-Quik** on depalletizer surfaces and let air dry.

Proper Soda

Hudsonville, MI

Date Modified

April 15, 2021

Date Created

April 4, 2021

Procedure Number

Sanitation Standard Operating Procedure

Palmer

Product	Concentration
Defy	1.5ozs per quart of water
Sani Quik	0.5ozs per quart of water

Product	Test Kits
Defy	Acid
Sani Quik	Quat

Safety Equipment				
Product	Eye Protection	Apron/Rainsuit	Gloves	Respirator
Defy	Yes	No	Yes	refer to Section 8 on SDS
Sani Quik	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Defy	Contact with eyes will cause severe irritation. Prolonged or repeated exposure will irritate the skin. May irritate upper respiratory tract. Avoid contact with skin and eyes.
Sani Quik	Causes irritation (possibly severe), burns to the eyes. May cause skin irritation. May irritate the respiratory tract. Avoid contact with skin and eyes.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Modified By

Ethan Wiskur

Corporate Office: (800) 366-2477

Corporate FAX: (320) 693-8238

Instructions

- Fill a quart spray bottle from the dispensing unit with **Defy**. Clean palmer surfaces with **Defy** using the spray and wipe method.
- Fill a quart spray bottle from the dispensing unit with **Sani-Quik** to prepare a 200ppm active quaternary solution. This product is a no rinse sanitizer. Spray **Sani-Quik** on palmer surfaces and let air dry.

Proper Soda

Hudsonville, MI

Date Modified

April 15, 2021

Date Created

April 4, 2021

Procedure Number

Sanitation Standard Operating Procedure

Micro-Canner

Product	Concentration
Defy	1.5ozs per quart of water
Sani Quik	0.5ozs per quart of water

Product	Test Kits
Defy	Acid
Sani Quik	Quat

Safety Equipment				
Product	Eye Protection	Apron/ Rainsuit	Gloves	Respirator
Defy	Yes	No	Yes	refer to Section 8 on SDS
Sani Quik	Yes	No	Yes	refer to Section 8 on SDS

Product	Special Precautions
Defy	Contact with eyes will cause severe irritation. Prolonged or repeated exposure will irritate the skin. May irritate upper respiratory tract. Avoid contact with skin and eyes.
Sani Quik	Causes irritation (possibly severe), burns to the eyes. May cause skin irritation. May irritate the respiratory tract. Avoid contact with skin and eyes.

Please refer to SDS for further safety information.

24 Hour Emergency Telephone Number:

CHEM-TREC (800) 424-9300

Service Representative

Modified By

Ethan Wiskur

Corporate Office: (800) 366-2477

Corporate FAX: (320) 693-8238

Instructions

- Fill a quart spray bottle from the dispensing unit with **Defy**. Clean micro-canner surfaces with **Defy** using the spray and wipe method.
- Fill a quart spray bottle from the dispensing unit with **Sani-Quik** to prepare a 200ppm active quaternary solution. This product is a no rinse sanitizer. Spray **Sani-Quik** on micro-canner surfaces and let air dry.



Batch Tank CIP Concentration Tracking

Tank ID: _____

Date: _____

<u>Chemical</u>	<u>Target</u>	<u>Actual</u>	<u>Time</u>	<u>Actual</u>	<u>Concentration Test Results</u>
Rinse Water	35 gallon		15 min		Water Temp 120-140
Wash Water	35 Gallons		N/A		Water Temp 120-140
Super Alk HD	120 ounces		N/A		
Tec An OX-50	8 ozs		25-35 min		
Rinse Water	35 Gallons		15 min		
Sanitizer Water	35 gallons		N/A		
San Tec 6	8 ozs		10 min		
ATP Performed?	Y / N	Pass / Fail			

Batch Tank CIP Instructions

Step 1 - Fill the Batch Tank with the rinse water, confirm gallons and time above. Drain the system.

Step 2 - Fill the Batch Tank with wash water, add Super Alk HD and Tec An OX-50 to the wash water. after 10 mins stop the CIP, pull a sample and test for Sper Alk HD concentration.

If test results are between 1.0-3.0% resatrt the CIP. If they are low recharge the system with Super Alk HD. Confirm water, Super Alk HD, Tec An OX-50 above. Drain the system.

Step 3 - Fill the Batch Tank with the rinse water, confirm gallons and time above. Drain the system.

Step 4 - Fill the Batch Tank with Sanitizer water, add San Tec 6 water. After 5 mins stop the CIP, pull a sample and test for San Tec 6 concentration. If sample is between 82-500ppm restart the CIP, if it is low recahrge and start the CIP.

Step 5 - Drain the system, leave the valves and door open to allow it to dry



Product Tank CIP Concentration Tracking

Tank ID: _____

Date: _____

<u>Chemical</u>	<u>Target</u>	<u>Actual</u>	<u>Time</u>	<u>Actual</u>	<u>Concentration Test Results</u>
Rinse Water	75 gallon		15 min		Water Temp 120-140
Wash Water	75 Gallons		N/A		Water Temp 120-140
Super Alk HD	1.5 Gallons		N/A		
Tec An OX-50	12 ozs		25-35 min		
Rinse Water	75 Gallons		15 min		
Sanitizer Water	75 gallons		N/A		
San Tec 6	12 ozs		10 min		
ATP Performed?	Y / N	Pass / Fail			

Product Tank CIP Instructions

Step 1 - Fill the Product Tank with the rinse water, confirm gallons and time above. Drain the system.

Step 2 - Fill the Product Tank with wash water, add Super Alk HD and Tec An OX-50 to the wash water.
after 10 mins stop the CIP, pull a sample and test for Super Alk HD concentration.

If test results are between 1.0-3.0% restart the CIP. If they are low recharge the system with Super Alk HD.
Confirm water, Super Alk HD, Tec An OX-50 above. Drain the system.

Step 3 - Fill the Product Tank with the rinse water, confirm gallons and time above. Drain the system.

Step 4 - Fill the Product Tank with Sanitizer water, add San Tec 6 water. After 5 mins stop the CIP, pull a sample and test for San Tec 6 concentration. If sample is between 82-500ppm restart the CIP, if it is low recharge and start the CIP.

Step 5 - Drain the system, leave the valves and door open to allow it to dry