



FLUID  FORMS

Hazard Analysis Risk-based Preventive Control

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FLUID FORMS

PREVENTIVE CONTROL PROGRAM

UNITED PACKAGING GROUP, LLC/PENTA, LLC

The purpose of this program is to monitor factors, both external and internal in the processing operation that without proper control could lead to unsafe and unwholesome products to consumers.

This program does not focus on health hazards alone, but also on critical control points related to economic fraud, such as adulteration, substitution, dilution and the like.

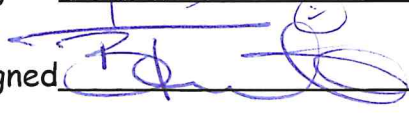
This program is designed to include all products manufactured at UNITED PACKAGING GROUP, LLC/PENTA, LLC. Encompassing all stages of production from raw material receiving to finished product storage and distribution.

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IMPLEMENTATION OF PREVENTIVE CONTROL PROGRAM for UNITED PACKAGING GROUP, LLC/PENTA, LLC

The following PREVENTIVE CONTROL PROGRAM has been implemented for UNITED PACKAGING GROUP, LLC/PENTA, LLC. The undersigned certifies that the plan conforms to 21 CFR 110, 21 CFR 111 and 21 CFR 129.

Signed Maria Salazar Title QA Manager Date 08.20.2020

Signed  Title QA Document Controller Date 08.20.2020

August 08/20/2020



FLUID  **FORMS**

NAME OF COMPANY: UNITED PACKAGING GROUP, LLC/Fluid Forms Inc./PENTA, LLC

ADDRESS: 1601 E. STEEL RD.
COLTON, CA 92324

TELEPHONE: (951) 340-4400

FAX: (951) 340-4422

HACCP TEAM

Maria Salazar

HACCP COORDINATOR

Team Members:

1. Maria Salazar*
2. Oscar Chavez*
3. Lynette Lemus
4. Bianca Faurrieta*
5. Freddie Estremera
6. Temo Blass
7. Alex Miller

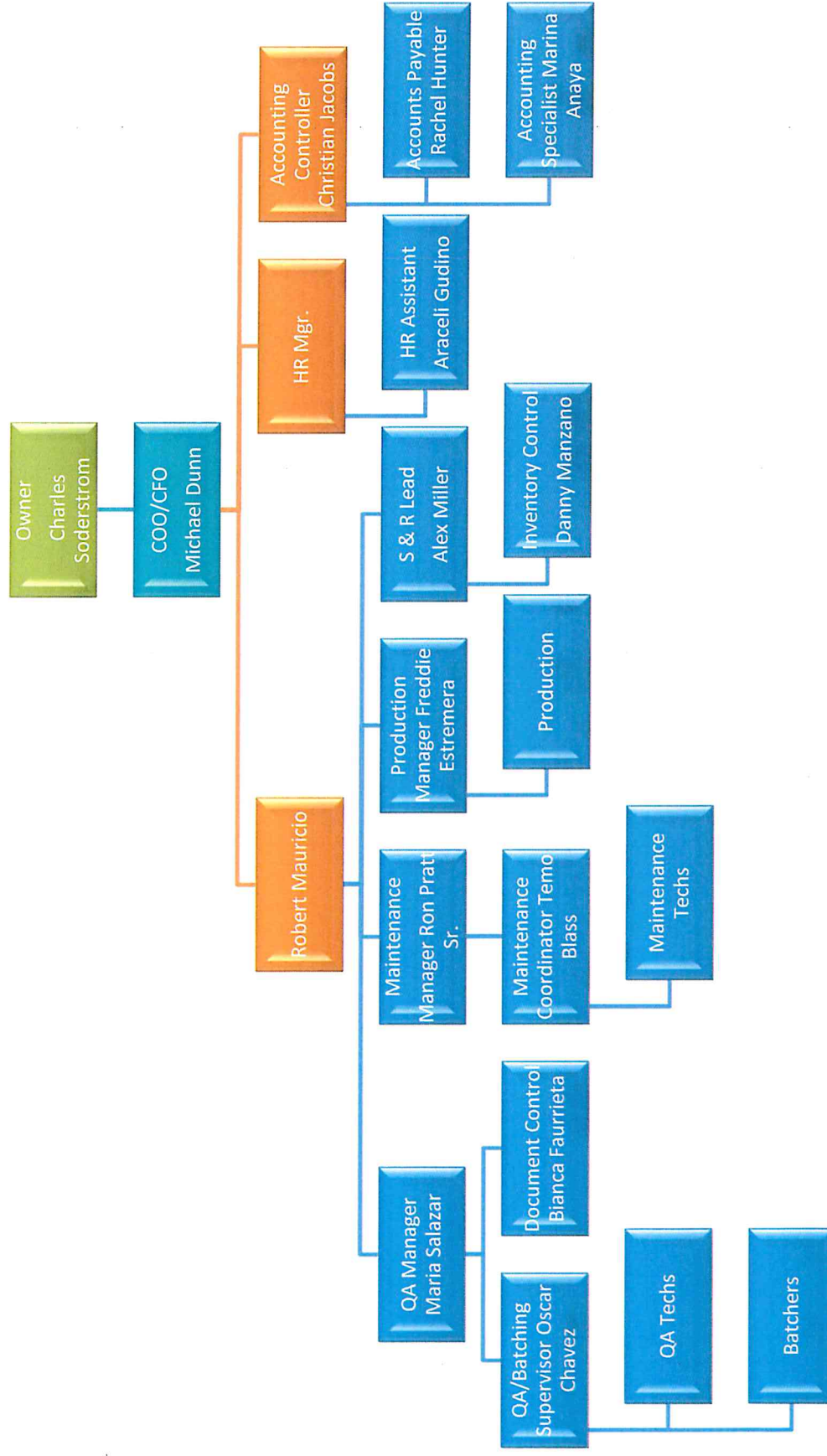
QA Manager
QA Supervisor
Safety Manager
Document Control
Production Manager
Maintenance Manager
Warehouse Supervisor

*HACCP Certified

Prepared by:
Maria Salazar*
Quality Assurance Manager
SQF Practitioner
PCQI

Approved: 

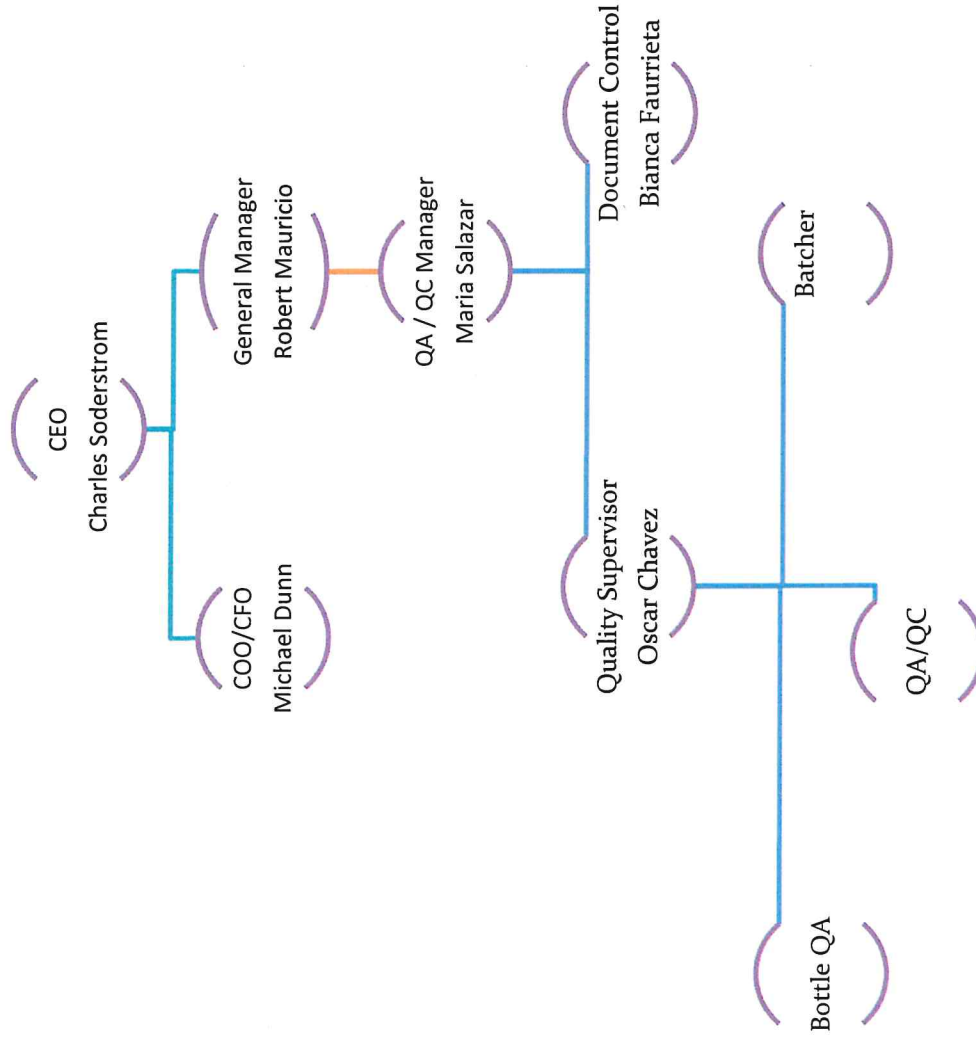
United Packaging Group



1.002 Organizational Chart
Effective: August 20, 2020

Approved By: Maria Salazar
Approval Date: 08-20-2020

United Packaging Group Quality Department



1.002A Organizational Chart
Effective: August 20, 2020

Approved By: Maria Salazar
Approval Date: 08.20.2020

United Packaging Group, LLC
Fluid Forms Inc.
1601 E. Steel Rd.
Colton, CA 92324

HARPC PROCESS DESCRIPTION

PRODUCT:	Injection Molding
Product:	Injection Molding
Brand Name:	N/A
Product Description:	PET (Polyethylene terephthalate) Preforms
Intended Use:	For blow molding
Type of Package:	Bulk Packaging (Gay Lords)
Shelf Life:	12 Months to 18 Months
Where Sold:	CO-Packers; Blow molding facilities
Labeling Instructions:	Gay Lord Tags with Lot Codes
Special Distribution Controls:	Lot Code Control needed for traceability. Storage under ambient conditions. Dry shipping; BOLs; Enclosed Containers.

United Packaging Group, LLC
Fluid Forms Inc.
1601 E. Steel Rd.
Colton, CA 92324

HARPC PROCESS DESCRIPTION

PRODUCT:

Blow Molding

-
- | | |
|-----------------------------------|--|
| 1. BRAND NAME: | VARIOUS |
| 2. PRODUCT DESCRIPTION: | PET (polyethylene terephthalate) |
| 3. INTENDED USE: | Non-Carbonated Beverages/Carbonated |
| 4. TYPE OF PACKAGE: | Pallet, Bulk Packaging (Gaylords) |
| 5. SHELF LIFE: | Twelve months to (2) YEARS |
| 6. WHERE SOLD: | Co-Packers, Filling Lines |
| 7. LABELING INSTRUCTIONS: | Pallet Tags, Gaylord Tags, with Lot Codes |
| 8. SPECIAL DISTRIBUTION CONTROLS: | LOT CODE CONTROL NEEDED FOR TRACEABILITY. DISTRIBUTION AND STORAGE UNDER AMBIENT CONDITIONS. |

United Packaging Group, LLC
Fluid Forms Inc.
1601 E. Steel Rd.
Colton, CA 92324

HARPC PROCESS DESCRIPTION

PRODUCT:

BATCHED WATER

-
- | | |
|--------------------------------------|---|
| 1. BRAND NAME: | VARIOUS |
| 2. PRODUCT DESCRIPTION: | ALKALINE WATER |
| 3. INTENDED USE: | CONSUMED AS PURCHASED |
| 4. TYPE OF PACKAGE: | PET PLASTIC BOTTLE AND HDPE CAP;
PACKED IN CORRUGATED TRAY OR CASE
AND OVERWRAPPED W/SHRINK FILM. |
| 5. SHELF LIFE: | TWO (2) YEARS |
| 6. WHERE SOLD: | RETAIL & FOOD SERVICE SALES |
| 7. LABELING INSTRUCTIONS: | EXPIRATION DATE OR DATE OF
MANUFACTURE ON EACH CONTAINER. |
| 8. SPECIAL DISTRIBUTION
CONTROLS: | LOT CODE CONTROL NEEDED FOR
TRACEABILITY. DISTRIBUTION AND
STORAGE UNDER AMBIENT CONDITIONS. |

United Packaging Group, LLC
1601 E. Steel Rd.
Colton, CA 92324

HACCP PROCESS DESCRIPTION

PRODUCT: **Preforms/ Bottles Ingredients**

Resin:

- PET/PETE (polyethylene terephthalate) IN USE
- 100% virgin
- BPA FREE
- SDS Available

Bottles:

- PET/PETE (polyethylene terephthalate) IN USE
- 100% Virgin
- BPA FREE
- SDS Available

Batched Waters Active Ingredients

Minerals

- Magnesium Chloride (Mineral Enhanced Purified Water)
- Potassium Bicarbonate (Mineral Enhanced Water)
- Potassium Chloride (Mineral Enhanced Purified Water)
- MBO (Perfect)

Water Base

- Alkaline Water Base (AURA/POSITIVE BEVERAGE)

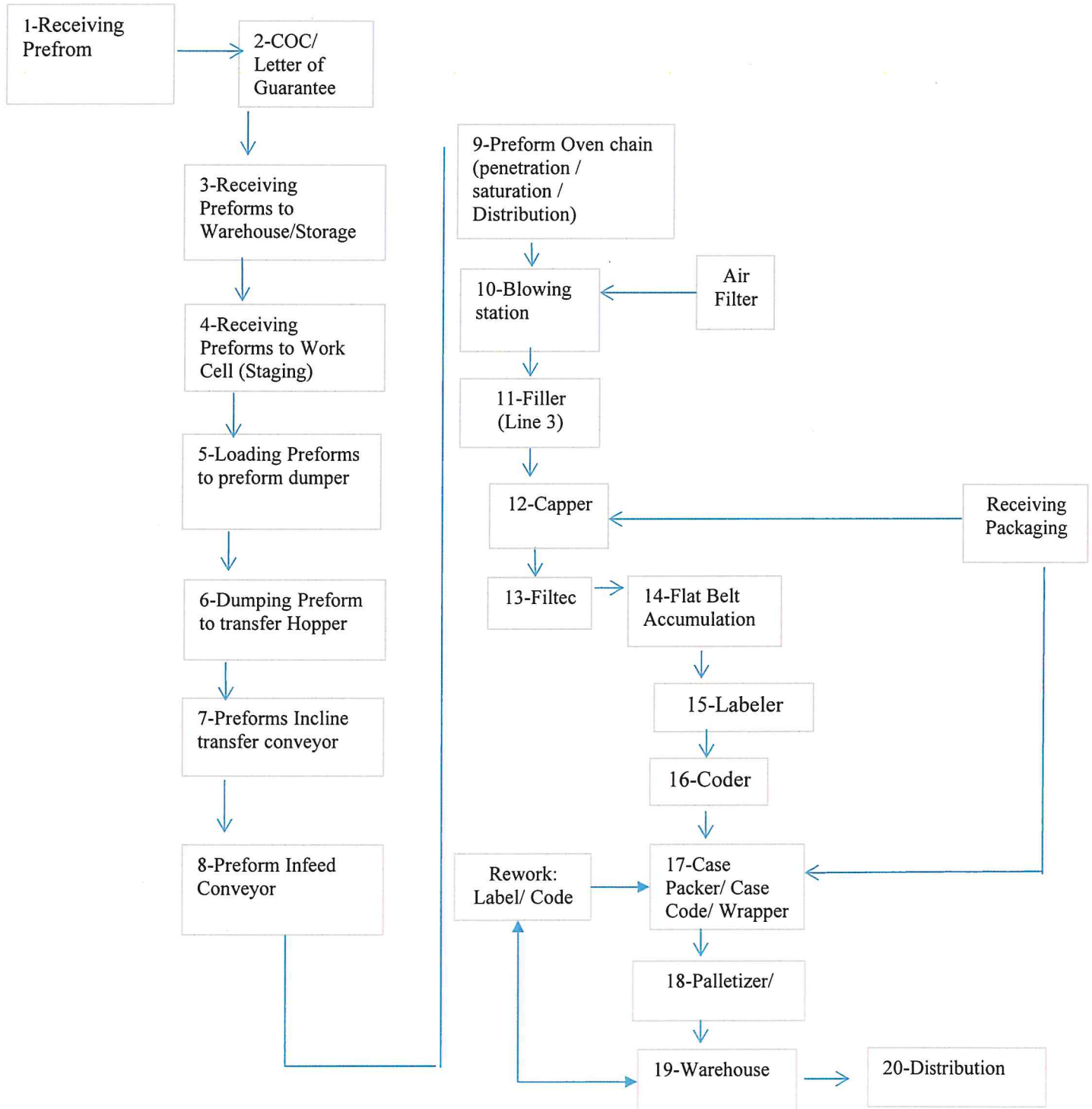
Water

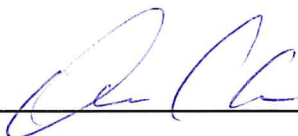
- Purified Water
- Ultra-Purified Water (Penta)

Beverage (CSD)

- Water (Spring Water)
- Flavoring:
 - Lemon Zest FLV # 43896828
 - Mixed Berry FLV #43896829
 - Raspberry Lime FLV #43896823
 - Lemon Lime FLV #43896827
 - Lime FLV #46896825
 - Black Cherry #43896751
 - Orange FLV #43896826
- CO2

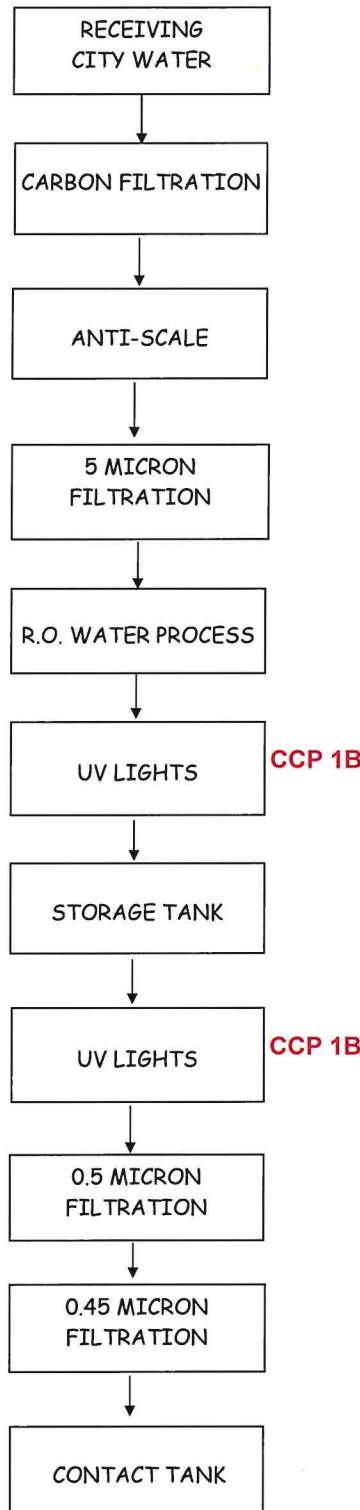
Bottle Production Process Flow Chart



Reviewed By:  Date: 08/20/20

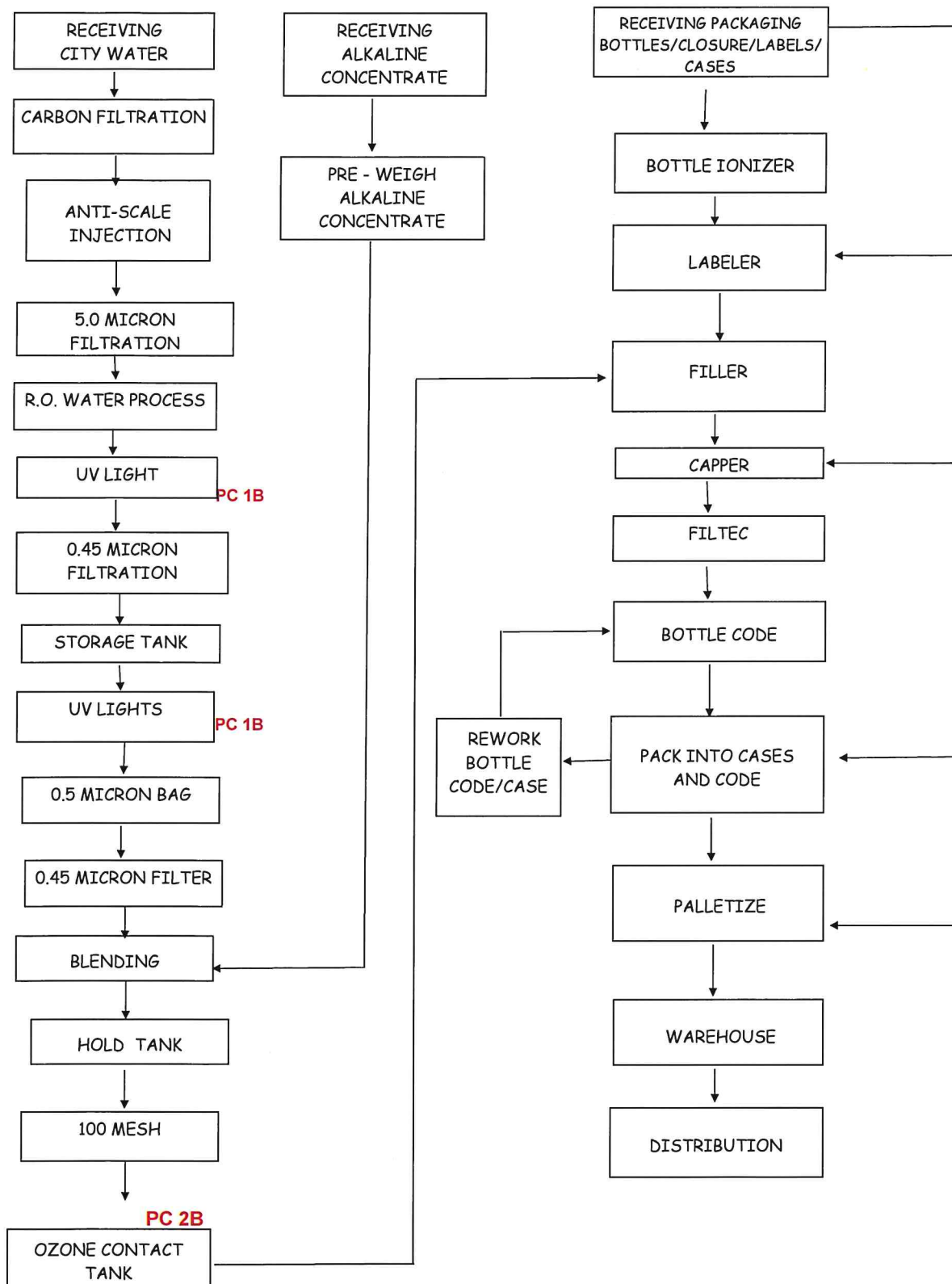


RO WATER PROCESS FLOW CHART





POSITIVE BEVERAGE WATER PROCESS FLOW CHART



Preventive Control - Batched Water (Alkaline)

	Processing Step	Hazard Type	Potential Hazards introduced, controlled or enhanced at this step	Does this hazard need to be addressed in PC plan (YES/NO)	Justification for decision made in previous column	Consequence	Frequency Value	Significance	What PC measures can be applied to prevent the food safety hazard	Is the Preventive Control applied at this step (Yes/No)
1	Receiving City Water	B	Microbial Pathogens	YES	Literatures states pathogens may occur in municipal water sources and have caused foodborne illness. City water supply is filtered to remove parasites. Low likelihood of pathogens existing in source water. No history of contamination.	5	D	24	Ultraviolet treatment and filtration at later steps further control any potential hazard	NO
		P	Extraneous Matter	NO	Incoming water from municipal source passed several filtration processes before public consumption	4	D	21		NO
		C	Chemical	NO	Water is being treated for drinking standard	3	C	13		NO
2	Carbon Filtration	B	Microbial Pathogens	YES	The potential existence of microbial pathogens in Carbon or RO filtered water, however this hazard is not likely to occur in the finished product because carbon filtration is cleaned to maintain acceptable micro result.	4	D	21	Ultraviolet treatment and filtration at later steps further control any potential hazard	NO
		P	Extraneous Matter (Carbon)	NO	Incoming water from municipal source passes several filtration processes before public consumption	5	D	24		NO
		C	None identified	NO	Incoming water from municipal source passed several filtration process before public consumption	5	E	25		NO
3	Anti- Scale	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
4	5 Micron Filtration	B	Microbial Pathogens	YES	Literatures state pathogens may occur in municipal water sources and have caused foodborne illness. City water supply is filtered to remove parasites. Low likelihood of pathogens existing in source water. No history of contamination.	5	D	24	Ultraviolet treatment and filtration at later steps further control any potential hazard	NO
		P	Extraneous Matter	NO	Potential carbon residual from carbon filtration, which could be captured through filtration at later step.	5	E	25		NO
		C	None identified	NO						

Preventive Control - Batched Water (Alkaline)

5	R.O. Water Process	B	Microbial Pathogens	YES	Microbial pathogens filtered by the membrane. Low likelihood of pathogen existing in municipal water due to the filtering process before public consumption.	5	D	24	Ultraviolet treatment and filtration at later steps further control any potential hazard	NO
		P	None identified	NO						
		C	None identified	NO						
6	UV Lights	B	Microbial Pathogens	YES	Literatures state pathogens may occur in municipal water sources and have caused foodborne illness. City water supply is filtered to remove parasites. Low likelihood of pathogens existing in source water. No history of contamination.	5	D	24	Ultraviolet treatment inactivates microbial pathogens and control hazard	YES
		P	Glass fragments/residual	NO	Hazard not likely to occur. PM program for UV system. Hourly checks to ensure equipment is working at optimum level.	5	E	25		NO
		C	None identified	NO		5	E	25		NO
7	0.45 Micron Filter	B	Microbial Pathogens	NO	Microbial pathogens killed from ultraviolet filtration will be filtered during this process	5	D	24		NO
		P	Extraneous Matter	NO	Potential foreign material, which could be captured in this process	5	E	25		NO
		C	None identified	NO						
8	Storage Tank	B	Microbial Pathogens	NO	Microbial pathogens killed from ultraviolet filtration will be filtered during this process	5	D	24		NO
		P	Extraneous Matter	NO	Potential foreign material, which could be captured in this process	5	E	25		NO
		C	None identified	NO						
9	UV Lights	B	Microbial Pathogens	YES	Literatures state pathogens may occur in municipal water sources and have caused foodborne illness. City water supply is filtered to remove parasites. Low likelihood of pathogens existing in source water. No history of contamination.	5	D	24	Ultraviolet treatment inactivates microbial pathogens and control hazard	YES
		P	Glass fragments/residual	NO	Hazard not likely to occur. PM program for UV system. Hourly checks to ensure equipment is working at optimum level.	5	E	25		NO
		C	None identified	NO		5	E	25		NO
		B	Microbial Pathogens	NO	Microbial pathogens killed from ultraviolet filtration will be filtered during this process	5	E	25		NO

Preventive Control - Batched Water (Alkaline)

10	0.5 Micron Bag	P	Extraneous Matter	NO	Potential foreign material, which could be captured in this process	5	E	25		NO
		C	None identified	NO		5	E	25		NO
11	0.45 Micron Filter	B	Microbial Pathogens	NO	Microbial pathogens killed from ultraviolet filtration will be filtered during this process	5	E	25		NO
		P	Extraneous Matter	NO	Potential foreign material, which could be captured in this process	5	E	25		NO
		C	None identified	NO		5	E	25		NO
		B	None identified	NO		5	E	25		NO
12	Weight/Measure Ingredients	P	Extraneous Matter	NO	Potential existence of foreign materials during pre weigh process will not reasonably likely to occur due to GMPs and further filtration process.	5	D	24		NO
		C	Cleaning chemicals	NO	Introduction of cleaning chemicals will not reasonably likely to occur due to hazards being controlled under our SSOP Program	5	D	24		NO
		B	None identified	NO		5	E	25		NO
13	Blending	P	Extraneous Matter	NO	Potential existence of foreign material that could enter batch storage tank which will not reasonably likely to occur and would be address at further processing step.	5	D	24		NO
		C	Cleaning chemicals	NO	Introduction of cleaning chemicals will not reasonably likely to occur due to hazards being controlled under our SSOP Program	5	D	24		NO
		B	None identified	NO		5	E	25		NO
14	Batch Hold Tank	P	Extraneous Matter	NO	Potential existence of foreign material that could enter batch storage tank which will not reasonably likely to occur and would be address at further processing step.	5	D	24		NO
		C	Cleaning chemicals	NO	Introduction of cleaning chemicals will not reasonably likely to occur due to hazards being controlled under our SSOP Program	5	D	24		NO
		B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
15	100 Mesh Filtration	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
16	Ozone Contact Tank	B	Microbial Pathogens	YES	Micro organism not killed on previous process	5	D	24	Ozonation at proper levels kills microorganism	YES
		P	None identified	NO		5	E	25		NO

Preventive Control - Batched Water (Alkaline)

		C	None identified	NO			5	E	25		NO
		B	Microbial Pathogens	NO	Literature states pathogens may occur on hands. Hazard not reasonably likely to occur. Prerequisite GMPs and SOPs for material handling, storage and hand washing. No history of contamination.		5	D	24		NO
17	Filler	P	Extraneous Matter	NO	Hazard not reasonably likely to occur. No history of contamination. Containers are rinsed and inverted prior to filling. GMPs and SOPs for product handling.						
		C	None identified	NO			5	E	25		NO
		B	Microbial Pathogens	NO	Not reasonably likely to receive packaging materials with microbial pathogen due to prerequisite program. Materials are purchased from approved supplier. Letter of guarantee on file		5	D	24		NO
18	Receiving Packaging Materials	P	Extraneous Matter	NO	Not reasonably likely to receive packaging materials with extraneous matter due to prerequisite program. Materials are purchased from approved supplier. Letter of guarantee on file		5	D	24		NO
		C	Non food grade material	NO	Not reasonably likely to receive packaging materials with non food grade material due to prerequisite program. Materials are purchased from approved supplier. Letter of guarantee on file		5	D	24		NO
		B	None identified	NO			5	E	25		NO
19	Bottle Ionizer	P	Extraneous Matter	NO	Potential extraneous material could exist, however hazard will be address in GMP and SOP program		4	D	21		
		C	None identified	NO			5	E	25		NO
		B	Microbial Pathogens	NO	Not reasonably likely to receive packaging materials with microbial pathogen due to prerequisite program. Materials are purchased from approved supplier. Letter of guarantee on file		5	D	24		NO
20	Cap	P	Extraneous Matter	NO	Not reasonably likely to receive packaging materials with extraneous matter due to prerequisite program. Materials are purchased from approved supplier. Letter of guarantee on file		5	D	24		NO
		C	None identified	NO			5	E	25		NO

Preventive Control - Batched Water (Alkaline)

21	Filter	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
22	Label/Code	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
23	Pack Into Cases/Trays and Coding	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
24	Palletize	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
25	Dry Storage	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
26	Distribution	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO
27	Rework Label/Code	B	None identified	NO		5	E	25		NO
		P	None identified	NO		5	E	25		NO
		C	None identified	NO		5	E	25		NO

CRITICAL LIMITS, MONITORING AND CORRECTIVE ACTIONS

PROCESS STEP	CCP	HAZARD DESCRIPTION	CRITICAL LIMITS	MONITORING			RESPONSIBLE PERSON	CORRECTIVE ACTION	RECORDS	VERIFICATION
				WHAT	HOW	FREQUENCY				
UV LIGHTS INFEBD	CCP 1	REDUCTION OF BACTERIAL LOAD	UV LIGHTS ARE ON	INDICATOR LIGHTS/METER	VISUALLY CONFIRM THAT ALL INDICATOR LIGHTS ARE ON AND/OR METER READS 100%	AT START-UP AND EVERY HOUR OF PROCESSING ± 15 MINS.	TRAINED TECHNICIAN	PRODUCT WILL BE REJECTED OR HELD. SAFETY OF PRODUCT WILL BE EVALUATED AND IF NOT REJECTED, DISPOSITION WILL BE MADE ACCORDING TO QA HOLD PROGRAM	UV AND CONTACT TANK CCP FORM	DIRECT OBSERVATION OF MONITORING ACTIVITIES BY TRAINED TECHNICIAN DAILY
									CORRECTIVE ACTION LOG	HACCP CERTIFIED PERSONNEL WILL CONDUCT REVIEWS OF MONITORING, CORRECTIVE ACTION AND APPLICABLE VERIFICATION RECORDS AT LEAST WEEKLY.
									QA HOLD LOG	
UV LIGHTS OUTFEED	CCP 2	REDUCTION OF BACTERIAL LOAD	UV LIGHTS ARE ON	INDICATOR LIGHTS/METER	VISUALLY CONFIRM THAT ALL INDICATOR LIGHTS ARE ON AND/OR METER READS 100%	AT START-UP AND EVERY HOUR OF PROCESSING ± 15 MINS.	TRAINED TECHNICIAN	PRODUCT WILL BE REJECTED OR HELD. SAFETY OF PRODUCT WILL BE EVALUATED AND IF NOT REJECTED, DISPOSITION WILL BE MADE ACCORDING TO QA HOLD PROGRAM	UV AND CONTACT TANK CCP FORM	DIRECT OBSERVATION OF MONITORING ACTIVITIES BY TRAINED TECHNICIAN DAILY
									CORRECTIVE ACTION LOG	HACCP CERTIFIED PERSONNEL WILL CONDUCT REVIEWS OF MONITORING, CORRECTIVE ACTION AND APPLICABLE VERIFICATION RECORDS AT LEAST WEEKLY.
									QA HOLD LOG	
MICRON FILTER	CCP 3	PREVENT GROWTH OF PATHOGENS	pH 4.2 OR BELOW	pH OF COMPLETED BATCH	pH METER	EVERY BATCH	TRAINED TECHNICIAN	ADJUST pH TO CORRECT LEVEL	BATCH pH FORM	DIRECT OBSERVATION OF MONITORING ACTIVITIES BY TRAINED TECHNICIAN DAILY
										HACCP CERTIFIED PERSONNEL WILL CONDUCT REVIEWS OF MONITORING, CORRECTIVE ACTION AND APPLICABLE VERIFICATION RECORDS AT LEAST WEEKLY.
OZONE-CONTACT TANK	CCP 4	REDUCTION OF BACTERIAL LOAD	≥0.1 PPM	OZONE CONCENTRATION IN CONTACT TANK	COLOR COMPARISON	AT START-UP AND EVERY HOUR OF PROCESSING ± 15 MINS.	TRAINED TECHNICIAN	ADJUST STRENGTH TO CORRECT LEVEL	UV AND CONTACT TANK CCP FORM	DIRECT OBSERVATION OF MONITORING ACTIVITIES BY TRAINED TECHNICIAN DAILY
			≤ 0.4 PPM					REJECT OR HOLD PRODUCT SINCE LAST CONFORMING RESULT. SAFETY OF PRODUCT WILL BE EVALUATED AND IF NOT REJECTED, DISPOSITION WILL BE MADE ACCORDING TO QA HOLD PROGRAM	CORRECTIVE ACTION LOG	HACCP CERTIFIED PERSONNEL WILL CONDUCT REVIEWS OF MONITORING, CORRECTIVE ACTION AND APPLICABLE VERIFICATION RECORDS AT LEAST WEEKLY.
									QA HOLD LOG	