

**NQS Level 1 - Food Safety Audit Report**  
**Peanut Corporation of America, Plainview, Texas**  
**January 5, 2006**

There is a remote building on the north side of the plant, which contains what appears to be excess equipment and items removed from the plant. There is a large amount of items stored in piles on the ground. This creates potential harborage areas for insects, rodents, and birds. The building on the southwest corner of the plant used to park the skins collection trailer has unacceptable amounts of product skins accumulated on the floor areas.

Food contact tools and non-food contact tools were separated and appropriately maintained. A number of brooms and shovels have wooden handles. Any tools with wooden handles in the manufacturing areas of the plant should be replaced with non-wooden handled items.

Employees were continually sweeping the floor areas around equipment as needed during the audit.

All packaging materials (cartons, totes, liners, etc.) were covered as appropriate and stored in a designated warehouse area. All items observed stored in the warehouse areas (ambient) were stored on pallets in floor locations.

There was no idle equipment stored in the warehouse areas of the plant.

There was a designated perimeter painted white about 18 inches wide maintained around the warehouse areas. This perimeter was free and clear of product storage, equipment storage, and any other unwanted dirt or debris. Along the exterior southwest wall of the pre-clean room, the concrete at the floor / wall juncture is eroded to a depth of 1 to 2 inches. This area was collecting dirt and debris and is not readily cleanable.

Brooms and other cleaning tools were observed stored hanging on designated racks in designated areas when not in use.

The plant GMPs state that food, beverage, gum, and tobacco products are acceptable in designated areas and are not allowed in the processing and / or warehouse areas of the plant. There were no food, beverage, gum or tobacco items observed in any areas of the plant other than the designated area observed.

There are hand-sanitizing stations located at the entryways to the production areas.

**GMPs – Sanitation**  
**Complying**

The general overall sanitary condition of the interior of the plant was good. There was minimal product build up on the overhead piping and walls in the pre-clean room. Any product accumulation provides a good environment for potential food source and harborage areas for pests, and a potential foreign material source for any product or equipment that might be located below it when it sloughs off.

The plant is both dry and wet cleaned. Hand tools, brooms, etc., and portable vacuums are used in the facility for some of the dry cleaning requirements. Sanitizer is applied for food contact surfaces after dry cleaning. For wet cleaning, there are no CIP systems in this facility. Some equipment is disassembled and washed in a COP tank.

The plant has established basic cleaning procedures and instructions for the pieces of equipment in the operation. These procedures are developed only for the major tasks. The cleaning standard operating procedures (SOPs) need to be developed throughout the plant to address all wet and dry cleaning. SOPs should be written to outline each task, the cleaning frequency, who is responsible for cleaning, chemicals to be used, chemical concentrations, personal protective equipment, tools needed to complete the task, and anything other information the plant personnel might need for these tasks.

The Master Cleaning Schedule is very basic, and does not include a number of items in the plant such as walls, ceilings, air vents, electrical panels, floor drains, etc. All exterior areas of the plant should be added to master cleaning schedules as poor conditions can lead to potential infestations issues. All of these items should also have procedures developed as described above.

The plant maintains a pre-operational inspection of the processing lines and equipment to assure cleanliness and functionality. Equipment operators are responsible for the sanitation of the equipment they operate. Production supervisors and operators are responsible for ensuring equipment is clean and properly set up prior to start-up.

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There are no bulk chemicals for cleaning received at this site.

Janitorial supplies are on hand for cleaning the office area and facility restrooms. These are stored in a designated location away from the production areas.

Overall, good sanitation was evident throughout the interior of the facility.

**GMPs – Pest Control**  
**Not Complying**

The facility uses a 3<sup>rd</sup> party pest control service – McIlroy's Pest Control – for pest control services. The plant has a basic pest control policy (dated December 29, 2005) around which the 3<sup>rd</sup> party program is designed. There is a pest control manual in which the business license, PCO certification, device schematics, services reports, and MSDS sheets are contained. There is no written description of the service that McIlroy's is to provide. McIlroy provides service every 2 weeks. All pest control devices are inspected each service. The frequency of device inspection may be increased if determined necessary. A site map, service reports with general or vague inspection comments, PCO certification, company business license, and chemical MSDS sheets are all in order and current. The plant quality control manager is the primary contact for the pest control operator, before, during, and following each service call.

The pest control operator (PCO) is certified in Texas, and has license number 22365 PTLW, which expires March 23, 2006.

The pest control program is supplemented by an in-house warehouse-fogging program utilized during the warmer season. This program consists of routine fogging of the plant warehouse areas utilizing a central system applying Entech Fog 5 (pyrethrum). This pesticide is stored in a locked cage within the maintenance shop. This locked cage area also contains some maintenance items. The pesticide storage area needs to be separated from a routine maintenance use and storage area.

The plant utilizes 36 multi-catch traps (and glue boards) on the interior of the building, and 36 rodent bait stations on the exterior of the building. Pheromone monitors are utilized for stored product pests in the warehouse areas of the plant during the warmer season. Each device is inspected by the PCO during the site visit. All results are documented on the service reports. The plant should work with the PCO to develop a sheet that documents pest activity in a manner that trends can easily be seen. The sheets should be able to easily indicate problem areas or areas of concerns.

The pest control logs for the past 10 months were reviewed with varying levels of rodent activity noted on every report. The activity was primarily noted on the exterior of the building, but there were also concerns in the interior areas of the building. The pest control reports indicate that the plant has an on-going concern with rodent activity occurring at varying levels. The number of devices originally utilized in the service program were doubled after about 5 months of service. The service reports reviewed also say, "seal all voids around doors to prevent pest entry", without noting for which door is a concern. The PCO has utilized a straight line out to indicate some of the devices are being inspected. Each and every device that is inspected should be marked on the log sheet with an individual mark.

The plant maintains asphalt / concrete perimeter on all sides of the building. This area was completely clear except for the pest control devices that had been installed, and the dirt and product debris referenced in the sanitation section above. The paved portions of the property around surrounded by vacant fields. The fields currently contained minimal vegetation and dirt.

During the audit of the exterior of the building, the following was observed:

- 1) A bait box on north side of building near ramp was missing the top. The rodenticide was on the ground about 2 feet from the stations. There was another bait station installed about 4 feet away from the damaged bait station.
- 2) The partition walls around the exterior compressor room on the south west corner of the building are constructed of 2 layers of metal with about 3 inches of space in-between the layers. The area inside of this wall was easy viewed (due to the way they had been cut off) contained about 8 to 10 inches of dirt, product debris (skins), and mice carcasses.
- 3) Mouse carcass lying near bait station #10.
- 4) 3 mice carcasses and burrows under the grating located near on the wall near the shipping doors.
- 5) 3 mice carcasses in varying stages of decay lying near bait station #11.

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- 6) 4 mice carcasses in varying stages of decay lying near bait station #12.
- 7) > 14 mice carcasses in varying stages of decay lying near bait station #13.
- 8) 5 mice carcasses in varying stages of decay lying near bait station #14.
- 9) > 10 mice carcasses in varying stages of decay lying near bait station #15.
- 10) 1 mice carcass in varying stages of decay lying near bait station #18.
- 11) 3 mice carcasses and 1 rat carcass in varying stages of decay lying near bait station #20.
- 12) 5 mice carcasses and 1 rat carcass in varying stages of decay lying near bait station #21.
- 13) 1 mouse carcass in the foam insulation near the corner of the building (area near emergency exit door on the south wall for the pre-clean room).
- 14) Numerous burrows along area on south side of plant where asphalt ends and dirt begin.
- 15) A dead pigeon was lying on the ground near the peanut-receiving door.
- 16) 4 pigeons roosting on the iron support structure inside the skin collection building. The doors to this outside building were hanging open, as the trailer was not completely backed into the building. Based on the feces observed, and by building design, it appears as if bird activity is a problem (and a potential problem) for this building.
- 17) A lot of rodenticide was scattered loosely on the ground on the south and southwest exterior of the building.

There were no insects or rodent activity observed in the interior areas of the plant during the audit.

From my observations during the audit walk through and from the pest control program records, plant management needs to review and revise the current program to incorporate more Integrated Pest Management techniques. This plant has a serious on-going problem with rodents on the exterior portions of the building that must be resolved. Although there were no observations of rodents or rodent activity in the interior of the plant noted during this audit, the levels of dead rodents observed, coupled with voids noted around some doorways, indicate there are potential concerns for the interior areas of the plant.

Overall, the current pest control program appears to be less than effective and is unacceptable.

**GMPs - Other**  
**Complying with Major Improvement Needed**

All areas of the plant observed are in age appropriate condition and maintained in an acceptable manner. Floors (concrete), walls (concrete / metal siding) and ceilings (drop, concrete, metal) were mostly in good repair, with no major cracking or breaks noted. There were no open holes observed in the walls or floors from previous installations, however there were several pipe penetrations through interior walls in the pre-clean room that had not yet been sealed around. Some of the concrete flooring was cracked and broken. This was in particularly poor condition where previous existing walls had been removed. The concrete at the floor / wall juncture on the west side of the pre-clean room was eroded to a depth of 1 – 2 inches.

The paint is peeling on the walls in the pre-clean room. The areas in the corners of the room seem to be in the worst condition.

All manufacturing equipment viewed was in acceptable condition, of sanitary design, and was appropriately clean. A number of pieces of equipment had been transferred to this location from the Blakely facility. No poorly constructed or inadequately designed pieces of equipment were observed. All equipment observed was permanently installed (bolted to floor or a platform), and appropriately sealed with caulking material. There were no poorly welded areas on the equipment observed. The weld on the chute at the peanut dump station in the pre-clean room was broken and in need of repair. No open ended unused conduits or piping was observed.

All hoppers for peanut storage and transport are open top vessels. There were no areas of dirt or debris accumulated on overhead piping or conduits above any of these vessels noted during this audit. The conveyor above the #13 Roka de-stoner had been equipped with a cardboard top held on with duct tape to attempt to control product from blowing into the air and out of the conveyor. This conveyor had also been labeled as #1 using paper and duct tape. This was noted on several different pieces of equipment in the facility. It was understood that these were used as equipment identification markers during installation and were being replaced with metal tags.

A delron guide rail cover above the bucket elevator near the raw nut dumper was damaged and coming loose from the equipment.

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All sides of exterior of the building are surrounded by asphalt. The areas along the south and west sides of the plant had significant amounts of dirt and product debris piled up along the building. This creates a potential food source and harborage for insects and rodents and should be maintained clean.

All exterior doors were closed with marginal seals in place. There were a number of small gaps noted in the seals of a number of the doors. Each emergency exit door is maintained closed but not locked. Each door utilized for access by plant employees is equipped with a mechanical lock and is of a self-closing design.

There were hand-sanitizing stations located in the production areas of the facility. There are hand-washing facilities in the employee bathrooms. No employees were observed wearing gloves while working in this operation. No gloves were noted stored in non-designated locations.

Items requiring maintenance attention are noted during daily inspections of the equipment. There was no preventive maintenance database reviewed. The plant needs to consider developing a formal program which includes a complete list of items requiring maintenance, tasks by item, frequencies, issuance of work schedules, input of maintenance work performed, maintenance history, inventory of equipment, etc., and parts and control of stock in maintenance stores.

The plant restrooms and break room were clean and no issues were noted. Employees currently wear their own clothing and shoes to work in all areas of the facility. Employees wear hairnets and beardnets when in the plant. The plant needs to institute a written uniform policy where no employee street clothes would be exposed to product. The plant should also implement a plant designated shoe program with provisions for keeping the shoes in the plant. Employee clothing and shoes could potentially ring unwanted microorganisms, dirt, and debris into the operation. It was understood that most employees leave their shoes at the plant when not in use. The plant should define guidelines requiring that all plant shoes be kept at the plant when not in use. No employees were observed carrying items that could become potential foreign material in pockets above the waist. As a visitor, I was required to wear a hairnet.

There are currently no written plant guidelines for traffic control from raw to further processed. These requirements should include traffic patterns, uniform requirements (needs, changes, etc.), hairnet requirements, shoe requirements, fork truck controls, etc. It was understood that the operators typically work in one area.

The operator in the sizing room that was operating the filler was observed touching the product and then handling the exterior of the new boxes to be filled. The employee was touching product to help top of the box to attain the correct weight. This employee should wear clean gloves to touch product, or an appropriate tool should be designated for this operation.

The pre-clean room was of negative air pressure to the further processing areas.

All areas of the product handling areas of the plant were adequately lighted with lights that were shielded or contained shatterproof bulbs.

Two wire brushes were observed near the blanchers (34 B / 34 A) roaster and under the hoppers in the pack out room. Wire brushes can be an excellent source of metal foreign material in a process and should be eliminated.

No non-cleaning chemicals items observed in the plant. The plant does not have a policy for these types of items. All approved non-cleaning chemicals should be included in a written control program that lists the item, the usage point (and amount if appropriate), and the storage location when not in use. Compliance to this should be part of the on-going internal plant inspections. There were no non-cleaning chemicals observed in locations they did not belong.

There were no temporary repairs of tape, wires, strings, etc., observed, but tape was used in the operational areas as mentioned above. There should be minimal use of tape in the operating areas and when used, it should be controlled – dated of application, inspected regularly for condition, and a plan of action to eliminate its need. With the exception of 1 electrical transfer / control panel in the pre-clean on the south wall with parts stored on top of it, I did not observe any items being stored in or on locations they did not belong (electrical cabinets, control panels, etc.)

Wooden handled brooms and other cleaning tools were observed in the plant operating areas. Efforts need to be made to eliminate wood from the product processing areas.

The plant operators conduct daily inspections of equipment and areas prior to starting up, and throughout operations.

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Plant supervisors and managers conduct monthly internal audits. The entire plant interior and exterior is audited each month. These audits cover GMPs, housekeeping, operations, and sanitation. Any concerns are documented and corrective actions are assigned. Follow up occurs during future audits.

The granulation or sizing room is a separate room located adjacent to the finished product warehouse and has plastic strip curtain doors. Product is granulated and packed into finished product packages in this area. The airflow in the room was positive to the warehouse. There was some peeling paint observed on the housing of the bucket elevator by the sifter in this room.

The plant is in the process of adding an oil roasting line. The roasting equipment observed is in one corner of the finished product warehouse and the bulk infeed dump station (is same room as and) is about 30 feet from the pack-off station for blanched or roasted nuts. This process will need to be reviewed very closely prior to any start up to be sure that raw nuts are isolated from further processed nuts – this includes air flow, traffic flow, etc.

The plant has no documented supplier approval program. There are very few raw materials and packaging materials used in this facility. The plant sources raw materials and packaging materials from supplier that have long-term relationships with PCA and the other operating facilities.

The plant water is sourced from a municipal system. Water is primary for sanitation in this plant. The water is test annually by the city of Plainview for compliance to national drinking water standards. No testing results were reviewed as part of this audit. No additional testing is conducted on this water.

There are no bulk liquid ingredients received or utilized at this facility.

**Allergen Control**  
**Complying**

The plant has an allergen statement in place and recognizes peanuts as allergens. The allergen statement is a general overview of allergens and includes a list of the top 8 allergens. Only peanuts are processed in this facility.

PCA would be responsible to notify Nestlé if there are any potential changes to the allergen status.

**Bio-Security**  
**Complying with Major Improvement Needed**

The plant does have a brief general plant safety policy. The plant has not completed any formal assessment of the site for bio-security. A formal assessment should be completed of the site and appropriate action taken against concerns noted.

The plant is located in a rural agricultural area about 40 miles north of Lubbock, Texas.

The site is fenced on 3 sides with the front of the building not being fenced. The front of the building has one entry door. There is one main gate for entering the fenced shipping and receiving areas. An employee must manually open this gate. The gate was noted standing open during the audit. The plant indicated a truck had just entered the site and the supervisor was going to close the gate. The supervisor was noted closing gate a few minutes later.

There are no security camera systems monitoring any areas of the building or grounds.

Employees and visitors must enter the building through one front door. Once in the building, you must walk past the plant offices to gain access to the production areas.

No employee is issued any type of identification badge, and there are no electronic locks. All visitors are escorted while on site.

All plant access doors were closed and not locked during the audit. Truck drivers may enter the building near the shipping / receiving office and must stay in this area.