Chapter 5
Protection from Adulterants

Introduction

This chapter covers protection of food, food-packaging materials and food contact surfaces from various microbiological, chemical and physical contaminants, such as lubricants, fuel, pesticides, cleaning compounds, sanitizing agents, condensate and floor splash. Seafood can be considered ‘adulterated’ if they become contaminated by such substances.

5-1. Key Sanitation Concern No. 5:
To ensure that the food, food-packaging material and food contact surfaces are protected from various microbiological, chemical and physical contaminants, such as lubricants, fuel, pesticides, cleaning compounds, sanitizing agents, condensate and floor splash.

Any fishery product, component and/or ingredient is deemed to be adulterated if it meets the definition of an adulterated food under Section 402 of the Food Drug and Cosmetic Act and its related regulations under 21 CFR. While the legal definition is quite detailed, this chapter will focus on the parts of this legal definition that relate to sanitary practices. Interestingly, this definition requires scrutiny of sanitary practices because the adulterant ‘may’ be present due to improper sanitary practices. Foods processed in unsanitary conditions can be considered adulterated even without any evidence or measures of a contaminant.

5-2. Definition: Adulterated Food:

◆ If it (food) bears or contains any poisonous or deleterious substance which may render it injurious to health; . . .

◆ If it (food) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health;

Source: Section 402 of the Food, Drug and Cosmetic Act, items (a) 1 and (a) 4
The fishery product processor needs to be aware of all avenues which would cause a food product to be adulterated such that it may be unsafe to eat due to possible indirect or unforeseen contamination from such things as lubricants, fuel, pesticides, condensate, and residues or aerosols from toxic cleaning compounds. Plant employees must be trained to anticipate and recognize these possible indirect routes of contamination.

The possible causes are listed below.

*Contamination from toxic compounds*

1. Non-food grade lubricants in seafood products are considered adulterants because they may contain harmful substances.

2. Fuel contamination of seafood renders the product adulterated.

3. Only approved pesticides and rodenticides should be used to control pests in the plant and these compounds should only be applied as stated on the label.

4. Improper use of chemicals, cleaners, and sanitizers can cause adulteration of product directly through splash or spillage, or indirectly through aerosols and mist. Food, food contact surfaces and packaging materials should be removed, covered, or rinsed thoroughly when exposure to contaminants is possible.

5. Employees should be alert for toxic aerosols from non-food areas (outside the premises) or adjacent processing rooms.

*Contamination from insanitary condensate or standing pools of water*

1. Contaminated drips or condensate may contain pathogens, chemical residues, and filth that may render a product adulterated.

2. The lack of proper ventilation may cause condensation and drips to fall on the product, product contact surfaces and packaging materials.

3. Pooled or standing water could splash on the product or product contact surfaces, rendering the product adulterated. Splashing could be caused by foot or vehicle traffic through the standing water.

(Note: Condensation collecting on a sanitary surface (such as the clean, inside surface of a kettle lid) or in areas where product contact is highly unlikely (finished packaged product cooler) does not have to be addressed during the monitoring of this sanitation concern.)
Monitoring

The goal to monitoring this area is to ensure that the food, food-packaging material and food contact surfaces are protected from various microbiological, chemical and physical contaminants. As discussed in the next chapter (Chapter 6), the use of toxic compounds – pesticides, cleaning and sanitizing agents, fuel and lubricants – are frequently necessary in the seafood processing environment. In addition to these compounds, condensate forming on insanitary surfaces and water pooling on the floor are potential sources of microbial contamination of food products.

5-3. Goal:
To ensure that the food, food-packaging material and food contact surfaces are protected from various microbiological, chemical and physical contaminants.

When determining what to monitor, the seafood processor needs to be aware of how toxic compounds and condensate forming on insanitary surfaces and floor splash could potentially contaminate product. Processors must remember that contaminating product contact surfaces, ingredients and packaging materials is equivalent to contaminating the finished product.

5-4. What to monitor:
Any possible adulterant that could contaminate the food or food contact surfaces including:

◆ potential toxic compounds; and

◆ insanitary water (e.g., condensate forming on insanitary surfaces and standing pools of water).

A recommended monitoring frequency is at Pre-op or start-up and every four hours thereafter. The processor should be aware of the potential for product adulteration during the entire day’s operation from pre-op through processing and sanitation activities. Proper corrections would need to be taken when deviations from the established sanitation practices are noticed.

5-5. When to monitor:
◆ With sufficient frequency to ensure conformance;
◆ Recommend at start-up and every four hours during work hours; and
◆ Observe conditions and activities throughout the day.
Corrections to any unsatisfactory activity which could result in product adulteration should be made in a timely fashion to prevent potential contamination of food, food contact surfaces or packaging materials. The following list outlines some possible corrections to inappropriate activities (5-6).

5-6. Possible Corrections:

- Remove condensate from insanitary surfaces;
- Correct air flow and room temperatures to reduce condensation;
- Install covers to prevent condensation from falling on food, packaging materials or food contact surfaces;
- “Squeegee” floor to remove standing water;
- Direct foot or vehicle traffic around pools of standing water;
- Wash food contact surfaces inadvertently exposed to chemical adulterants;
- Erect screens to protect product when working with a toxic compound in a non-product area;
- Evaluate impact of improper use of toxic compounds to assess whether or not food has been contaminated;
- Reinforce training of employees to correct inappropriate activities; and
- Discard unlabeled chemicals.

Records

The records used to document conformance to protecting food, food packaging material, and food contact surfaces from adulteration do not have to be complicated. The example Daily Sanitation Control Record (5-7) combines the monitoring activity for two key sanitation conditions. The general statements on the recording forms can be very inclusive and can appear redundant with other listed monitoring concerns for cleanliness and sanitation. The distinction is to prevent a substance from adulterating the food. More detailed explanations can be part of a written SSOP plan. Likewise, some firms may customize their Daily Sanitation Control Records to specify checks for particular areas or procedures in processing, i.e.,

- no accumulation of condensate on the ceiling;
- location of hand dips or sanitizers relative to food and immediate food contact surfaces to prevent contamination from splashing; and
- no wash waters and residue runoff near food and food packaging.
Background

Protection from adulteration can be considered a 3-step process – before, during and after processing. Protection from adulteration before processing is best accomplished with a written SSOP plan. This plan should describe the requirements for receipt, handling and storage of packaging material, dry food ingredients, and fishery products to ensure they are not adulterated with non-food grade lubricants, fuel, chemicals, pathogens, sanitizer residues, condensate, through insect or rodent infestation, condensate, drip, aerosols, sanitizer residues or other deleterious substances. This plan should be communicated to the suppliers of food products, ingredients and packaging materials. Also, preliminary considerations for plant design and operation can reduce concerns for adulteration. Operating conditions should consider personnel flow, equipment layout and design, product flow, and ventilation controls that could influence surface condensation, and water and waste disposal.

The same SSOP plan can detail the required monitoring procedures to prevent adulteration during processing. The FDA regulations for HACCP compliance require routine sanitation monitoring to prevent adulteration during the actual processing procedures. The monitoring records will demonstrate that practices are adequate to prevent and correct potential adulteration.

Finally, the processor can not be responsible for all possible sources and causes of adulteration after the product leaves the processing operation, but prior considerations could influence product adulteration after processing. Selection of packaging materials, package integrity, cleanliness of transport vehicles, and further handling instructions can prevent potential contamination from both biological (microbial and pests) and chemical adulteration by persons and conditions used in transport, storage, display and consumer use. For example, selection of packaging materials should consider potential exposure to adulterants, the packaging operation should be monitored for integrity and proper components (i.e., inks, glues, etc.) and handling instructions should be communicated to handlers and buyers through product labeling and/or prior agreements.

Condensation

Condensation is a common problem in seafood processing environments and can lead to adulteration. Condensation dripping onto products in food handling or storage areas must also be prevented or controlled. Seafood processing and handling frequently occurs in a “wet” environment and moisture can collect or condense on ceilings, walls, overhead fixtures, pipes, and condenser coils or refrigeration units in coolers. Any area where moisture collects can provide a good environment for spoilage bacteria and pathogens such as Listeria monocytogenes to grow and multiply. Cross contamination can occur when dripping water or condensate from the plant facility or equipment is allowed to drip or splash onto ready-to-eat products.

Food handling and storage areas should be routinely monitored to ensure that these products are not exposed to this type of contamination. Plant equipment or conditions that cause dripping or condensation should be fixed or corrected as soon as they are observed, and products and ingredients should be covered or otherwise protected from this type of contamination until repairs are completed. Drip pans or other devices used to collect condensation in coolers or other areas should be drained frequently and cleaned and sanitized regularly. Mishandling of hoses during production hours often results in splash from floors onto food contact surfaces.
Work and storage areas must also be kept clean and free of standing puddles of water that could splash onto products and contaminate them with bacteria. These conditions should be monitored both inside and outside the plant. Monitoring should include loading docks and receiving areas, storage areas and coolers, as well as food-handling and production areas.
### Daily Sanitation Control Record

**Report Date:** 10/22/99

**Firm Name:** Any Seafood Co., Inc.

**Firm Address:** Anywhere, USA

<table>
<thead>
<tr>
<th>Sanitation Area and Goal</th>
<th>Pre-Op Time</th>
<th>Start Time</th>
<th>4 Hour Time</th>
<th>8 Hour Time</th>
<th>Post-Op Time</th>
<th>Comments and Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Safety of Water</td>
<td>7:35 AM</td>
<td>8:10 AM</td>
<td>12:15 PM</td>
<td>4:26 PM</td>
<td>6:00 PM</td>
<td>Replaced backflow preventon on hose faucet</td>
</tr>
<tr>
<td>(See Monthly Sanitation Control Record)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Back Siphonage-Hoses (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2) Condition and Cleanliness of Food Contact Surfaces</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(See Monthly Sanitation Control Record)</td>
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<td></td>
</tr>
<tr>
<td>- Equipment cleaned and sanitized Line 1: (S/U)</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td></td>
<td></td>
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<tr>
<td>Line 2: (S/U)</td>
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<tr>
<td>- Sanitizer Strength Sanitizer Type: Chlorine Strength: 100-200 ppm</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 1: (ppm)</td>
<td>100</td>
<td></td>
<td>100</td>
<td>50</td>
<td></td>
<td>Adjusted to 100 ppm before use (4:40 PM) Replace 10 pairs of gloves (8:30 AM)</td>
</tr>
<tr>
<td>Line 2: (ppm)</td>
<td>100</td>
<td></td>
<td>100</td>
<td>50</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Gloves and aprons clean and in good repair Line 1: (S/U)</td>
<td>U</td>
<td>S</td>
<td>S</td>
<td>N</td>
<td></td>
<td></td>
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<tr>
<td>Line 2: (S/U)</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>3) Prevention of Cross-Contamination (See Monthly Sanitation Control Record)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>- Hands, gloves, equipment, and utensils washed/sanitized after contact with unsanitary objects (S/U)</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>U</td>
<td>Two staff told to change apron before changing work stations</td>
<td></td>
</tr>
<tr>
<td>- Employees working on raw products, wash and sanitize hands/gloves/outwear before working with cooked products (S/U)</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>U</td>
<td>Raw fillets stored above &amp; stripping onto boxed smoked fish. Product checked and reworked</td>
<td></td>
</tr>
<tr>
<td>- Unpackaged cooked products separated from raw products (S/U)</td>
<td>S</td>
<td>S</td>
<td>S</td>
<td>U</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sanitation Area and Goal</td>
<td>Pré-Op Time:</td>
<td>Start Time:</td>
<td>4 Hour Time:</td>
<td>8 Hour Time:</td>
<td>Post-Op Time:</td>
<td>Comments and Corrections</td>
</tr>
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<tr>
<td></td>
<td>7:35A</td>
<td>8:10A</td>
<td>12:15</td>
<td>4:26P</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4) Maintenance of Hand-washing, Hand-sanitizing, and Toilet Facilities
   - Hand-washing and hand-sanitizing stations adequate
     - Hand-washing station
       Line 1: (S/U)  
       Line 2: (S/U)  
     - Hand-sanitizing station
     Sanitizer Type: Iodine
     Strength: 12.5 - 25 ppm
       Line 2: (ppm)  25 25 25  

5) Protection from adulterants and
6) Labeling, Storage, and Use of Toxic Compounds
   - Product protected from contamination (S/U)  5 5 5
   - Cleaning compounds, lubricants, and pesticides labeled and stored properly (S/U)  

7) Employee Health Conditions
   - Employees do not show signs of medical problems (S/U)  

8) Exclusion of Pests
   - Pests excluded from processing area (S/U)  

S = Satisfactory / U = Unsatisfactory  
Signature or initials: BSJ
Sanitation Control Guide

<table>
<thead>
<tr>
<th>Entry date:</th>
<th>Adulteration</th>
<th>FDA Key Condition No. 5</th>
</tr>
</thead>
</table>

**Concern:** Adulteration of Food Products

**Examples:**
Pest strips hung over food packaging area. Non-food-grade lubricants used on equipment. Condensation falling from ceiling, rafters, pipes and cooling coils above food handling area can drip onto foods, packing materials and work surfaces causing contamination.

**Controls and Monitoring:**
Check the type, use and positioning of pest control devices relative to food processing and storage. **Frequency: Daily, pre-op.**

 Routinely check that only food grade lubricants are used whenever moving machine parts are in contact with food. **Frequency: Daily, pre-op.**

 Check for ceiling and structure condensation before and during processing. **Frequency: Daily, pre-op and every 4 hours.**

**Recommended Corrections:**
Remove or re-position pest control devices in non-food handling area. Replace non-food grade lubricants (e.g., motor oil) with approved lubricants and evaluate any exposed product. Correct air flow and room temperatures to reduce condensation. Consider insulation to reduce surface temperature differences that cause condensation. Provide covers to prevent any condensation from falling on foods, packaging or work surfaces. Swab condensate in a manner so as not to contaminate foods. Evaluate any exposed product.

**Records:**
Daily Sanitation Control Record
Chapter 6
Proper Labeling, Storage and Use of Toxic Compounds

Introduction

This chapter covers labeling, storage and use of toxic compounds. It is important to note that improper use of toxic compounds is a frequent cause of product adulteration.

6-1. Key Sanitation Condition No. 6:

Proper labeling, storage and use of potentially toxic compounds.

Chemicals used in most food processing plants include compounds such as cleaners, sanitizers, rodenticides, insecticides, machine lubricants and some food additives. Without them the facility cannot operate. But they must be used wisely and carefully. They must be used according to manufacturer’s instructions, have proper labeling, and be stored in a safe manner; otherwise, they will pose a risk of contamination of the food products that the establishment is handling or manufacturing. All relevant government regulations relating to the application, use, or holding of these products should be followed. Due to the large number of different compounds available for use in facilities today, this chapter will not discuss specific information for each compound. Instead a general overview will be provided. Processors are encouraged to obtain additional information on compounds and solutions used in their processing operations.

Monitoring

6-2. Goal:

To ensure that the labeling, storage and use of toxic compounds are adequate to protect food from contamination.
The goal in monitoring this condition is to ensure that the labeling, storage and use of toxic compounds are adequate to protect food from contamination by toxic compounds. Areas of concern include food contact surfaces, packaging materials, and ingredients used both in processing and contained in finished products. Toxic compounds include cleaners, sanitizers, pesticides (for both insects and rodents), machine lubricants and other compounds needed to clean and maintain the seafood-processing environment.

When determining what to monitor, the seafood processor needs to consider the proper storage, proper labeling, as well as proper usage of toxic compounds.

6-3. 'What' to Monitor:

Are toxic compounds:
- properly labeled?
- properly stored?
- properly used?

The original containers for all chemicals must be labeled to show the name of the manufacturer, instructions for use, and the appropriate approvals (i.e., EPA registration). They should be enclosed in sanitary containers bearing the name and address of manufacturers or other qualifying phrases such as "manufactured for," "packed for," or "distributed by" if the substance is marketed by a firm other than the manufacturer. Often, it is necessary to take portions of the compound from the original container for use in the facility, since the original container is typically much too large and heavy for ease of use on the plant floor. Therefore, the working containers used for storing or using compounds such as cleaners and sanitizers which are routinely taken from the bulk supplies must also be clearly and individually identified with the common name of the material.

6-4. Proper Labeling of Containers:

- Original container labels should show:
  - Name of compound or solution in the container;
  - Name and address of manufacturers or "Manufactured for" or "Packed for" or "Distributed by" and appropriate approvals; and
  - Instructions for proper use.

- Working container labels must show:
  - Name of compound or solution in the container; and
  - Instructions for proper use.
Chemicals used in cleaning and sanitizing treatments, as well as pesticides and rodenticides, must be properly stored in an area of limited access away from food handling or manufacturing. Usually this means in a locked room or cage, with the keys or combinations given only to necessary personnel. Cleaning chemicals should be segregated from insecticides and rodenticides to prevent accidental mixing or misuse. Likewise, food-grade chemicals should be stored away from nonfood-grade compounds. Typically, the original containers of the compounds are sufficient and well designed for this specific purpose.

6-5. **Proper Storage of Toxic Compounds:**
- room with limited access;
- segregate food grade from non-food grade; and
- keep away from food equipment, utensils and other food contact items.

These chemicals of concern should not be stored above food, equipment, utensils, or packaging materials. Working containers used for storing these materials, such as cleaners and sanitizers, that have been taken from the bulk supplies must also be sanitary and cleanable. A container previously used to store poisonous or toxic materials must not be used to store, transport, or dispense food or food ingredients, and should also not be used to store cleaners and sanitizers that would come into contact with food-contact surfaces. Likewise, the working container for using cleaners and sanitizers must not be a food container which could inadvertently be used to pack a food product.

6-6. **NEVER!**
Containers used to hold cleaners and sanitizers must not be food containers that could inadvertently be used to pack a food product.

Only those chemicals that are necessary for the operation and maintenance of a food establishment should be allowed in the facility. The proper use and handling of these chemicals, including cleaners, and detergents, is necessary to reduce the possibility of cross-contamination, adulteration, and ultimately illness. Compounds must be used in accordance to the manufacturer’s instructions or recommendations. All substances must be used in a manner that will not result in the adulteration of food products. Compounds must always be used according to applicable directions provided on the EPA registered label. The Material Safety Data Sheets (MSDS) supplied with the compound by the manufacturer or the supplier will provide information on its safe use.
6-7. Proper Use of Compounds:
- According to manufacturer’s instructions; and
- Procedure will not result in adulteration of products.

The storage, use and labeling of toxic compounds should be monitored with sufficient frequency to ensure conformance with this sanitation condition and practice. A recommended monitoring frequency is at least once per day. A “pre-op” inspection may be appropriate to ensure chemicals used for the previous day’s cleanup have been properly returned to storage. Processors should be continuously aware of the usage of toxic compounds during the entire day’s operation - from pre-op through processing and sanitation activities.

6-8. ‘When’ to Monitor:
- with sufficient frequency to ensure conformance;
- recommend at least once per working day; and
- observe conditions and activities throughout the day.

Corrections
Corrections to an unsatisfactory activity involving toxic compounds should be made in a timely fashion to prevent potential contamination of food, ingredients, food contact surfaces or packaging materials. The following list outlines some possible corrections to inappropriate activities:

- move incorrectly stored toxic compounds to proper storage location;
- return compounds with inadequate labeling back to supplier;
- relabel working containers which incorrectly identify compounds contained within;
- destroy or discard inappropriate or damaged working containers;
- evaluate impact of improper use of toxic compounds to assess whether or not food has been contaminated (in some cases destruction of the food may be necessary); and
- reinforce training of employees to correct inappropriate activities.
6-9. **Possible Corrections:**
- move incorrectly stored toxic compounds;
- return to supplier if inadequately labeled;
- correct labeling;
- destroy damaged containers;
- assess safety of food; and
- reinforce training of employees.

**Records**

The records used to document conformance to the proper labeling, storage, and use of toxic compounds do not have to be complicated. Example 6-10 shows an excerpt from a sample “Daily Sanitation Control Record” which groups concerns for all possible adulterations with monitoring for potential adulteration from toxic compounds. Obviously, potential adulteration from toxic compounds deserves specific attention. The monitoring activity suggested by this form is for a designated plant employee to observe that cleaning compounds, lubricants, and pesticides are labeled and stored properly. This monitoring activity, which is conducted at pre-op, can be judged satisfactory or unsatisfactory. Obviously an unsatisfactory rating would require some corrections. Other types of documentation can be just as effective to show compliance with the regulation. Another type of record is a “log” which would contain multiple days of monitoring information on one form (see I-25 and I-26, Introduction). A log, posted by the chemical storeroom, would keep a running history of conformance to this sanitation concern.

**Background**

It is important that the following serve as a general discussion only and that more detailed information applicable to the specific compounds can be found on the label as well as with the material data safety sheets (MSDS) required with potential toxic substances.

**Cleaners and Sanitizers**

Food products and packaging materials must be removed from the room or carefully protected. Before using compounds such as general cleaning agents, compounds for use with steam or mechanical cleaning devices, acid cleaners, and floor and wall cleaners. After using these compounds, surfaces must be thoroughly rinsed with potable water. When using floor and wall cleaners in areas with subfreezing temperatures, potable water rinsing is not required following their use, provided the solution and the soil it contains are effectively removed by wiping or wet vacuuming.

Residues resulting from the use of scouring cleaners should be carefully removed from surfaces by thoroughly rinsing with potable water. Metal cleaners and polishes for nonfood contact surfaces should be used in a manner so that all odors associated with the compounds are dissipated before food products or packaging materials are exposed again in the area.
Before using degreasers or carbon removers for food cooking or smoking equipment and utensils, food products and packaging materials should be removed from the room or carefully protected. After using these compounds, surfaces must be thoroughly rinsed with potable water and the compounds should be used in a manner so that all odors are dissipated before food products or packaging materials are exposed in the area. Laundry detergents, bleaches, and scouring powders may be used on fabrics that contact food products, directly or indirectly, provided that the fabric is thoroughly rinsed with potable water at the end of the laundering operation. Metal cleaners and polishes for nonfood contact surfaces and paint removers for use in nonprocessing areas should be handled similarly.

Compounds for use on all surfaces in inedible product processing areas, nonprocessing areas, and/or exterior areas must not be used to mask odors resulting from unsanitary conditions. They must be used in a manner that prevents penetration of any characteristic odor or fragrance into edible product areas. Compounds containing isomers of dichlorobenzene, or other substances toxic by inhalation, may be used only in areas where there is adequate ventilation to prevent accumulation of hazardous vapors.

Hand-washing compounds should be dispensed from adequate dispensers located a sufficient distance from the processing line to prevent accidental product contamination. Under conditions of use, there should be no odor or fragrance left on the hands. When using combination hand-washing and sanitizing compounds, the hands need not be washed prior to the use of the compounds. After the use of the compounds, the hands should also be thoroughly rinsed with potable water. When using hand-sanitizing compounds, the hands should be washed and thoroughly rinsed prior to sanitizing with the compound. The compound may be injected directly into the wash and rinse water and the hands need not be rinsed with potable water following the use of the compound. The use of hand creams and lotions should be limited to toilets and dressing rooms. Employees who handle edible products may use the lotions only when leaving the plant.
# Daily Sanitation Monitoring Form

**Daily Sanitation Control Record**

**Report Date:** 10/22/99  
**Firm Name:** Any Seafood Co., Inc.  
**Firm Address:** Anywhere, USA

<table>
<thead>
<tr>
<th>Sanitation Area and Goal</th>
<th>Pre-Op Time:</th>
<th>Start Time:</th>
<th>4 Hour Time:</th>
<th>8 Hour Time:</th>
<th>Post-Op Time:</th>
<th>Comments and Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Safety of Water</td>
<td></td>
<td>7:35A</td>
<td>8:10A</td>
<td>12:15</td>
<td>4:26P</td>
<td>6:00P</td>
</tr>
<tr>
<td>(See Monthly Sanitation Control Record)</td>
<td></td>
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<tr>
<td>◆ Back Siphonage-Hoses (S/U)</td>
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<tr>
<td>2) Condition and Cleanliness of Food Contact Surfaces (See Monthly Sanitation Control Record)</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>◆ Equipment cleaned and sanitized</td>
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<tr>
<td>Line 1: (S/U)</td>
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<td>Line 2: (S/U)</td>
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<tr>
<td>◆ Sanitizer Strength</td>
<td></td>
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<tr>
<td>Sanitizer Type: Chlorine</td>
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</tr>
<tr>
<td>Strength: 100-200 ppm</td>
<td>Line 1: (ppm)</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Line 2: (ppm)</td>
<td>100</td>
<td>100</td>
<td>50</td>
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<tr>
<td>◆ Gloves and aprons clean and in good repair</td>
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</tr>
<tr>
<td>Line 1: (S/U)</td>
<td></td>
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<tr>
<td>Line 2: (S/U)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3) Prevention of Cross-Contamination (See Monthly Sanitation Control Record)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>◆ Hands, gloves, equipment, and utensils washed/sanitized after contact with unsanitary objects (S/U)</td>
<td>S</td>
<td>S</td>
<td>U</td>
<td></td>
<td>Two staff told to change apron before changing work stations</td>
<td></td>
</tr>
<tr>
<td>◆ Employees working on raw products, wash and sanitize hands/gloves/outerwear before working with cooked products (S/U)</td>
<td>S</td>
<td>S</td>
<td></td>
<td></td>
<td>Raw fillets stored above &amp; dripping onto boxed smoked fish. Product checked and repacked.</td>
<td></td>
</tr>
<tr>
<td>◆ Unpackaged cooked products separated from raw products (S/U)</td>
<td>S</td>
<td>S</td>
<td>U</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Daily Sanitation Control Record (page 2)

<table>
<thead>
<tr>
<th>Sanitation Area and Goal</th>
<th>Pre-Op Time</th>
<th>Start Time</th>
<th>4 Hour Time</th>
<th>8 Hour Time</th>
<th>Post-Op Time</th>
<th>Comments and Corrections</th>
</tr>
</thead>
<tbody>
<tr>
<td>4) Maintenance of Hand-washing, Hand-sanitizing, and Toilet Facilities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>◦ Hand-washing and hand-sanitizing stations adequate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Hand-washing station</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Line 1: (S/U)</td>
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</tr>
<tr>
<td>Line 2: (S/U)</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>● Hand-sanitizing station</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sanitizer Type: Iodine</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Strength: 12.5-25 ppm</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Line 2: (ppm)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>◦ Toilets clean, properly functioning, and adequately supplied (S/U)</td>
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<tr>
<td></td>
<td>25  ()</td>
<td>25  ()</td>
<td>25  ()</td>
<td></td>
<td></td>
<td>Filled empty soap dispensers in men's bathroom ()</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5) Protection from Adulterants and</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Fan repositioned to prevent condensation on ceiling.</td>
</tr>
<tr>
<td>6) Labeling, Storage, and Use of Toxic Compounds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Unlabeled yellow liquid in chemical storage discarded.</td>
</tr>
<tr>
<td>◦ Product protected from contamination (S/U)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>◦ Cleaning compounds, lubricants, and pesticides labeled and stored properly (S/U)</td>
<td></td>
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<tr>
<td>7) Employee Health Conditions</td>
<td></td>
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</tr>
<tr>
<td>◦ Employees do not show signs of medical problems (S/U)</td>
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<td></td>
</tr>
<tr>
<td>8) Exclusion of Pests</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>◦ Pests excluded from processing area (S/U)</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

\(S = \text{Satisfactory} / U = \text{Unsatisfactory}\)

Signature or initials: BSJ
Water and Septic Tank Additives

Compounds used for water treatment should not remain in the water in concentrations greater than required by good practice. Chemical agents may be added to water used to cook and cool containers of food products to prevent staining of containers and to control corrosion and deposit formation on surfaces of processing equipment. The amount used should be the minimum sufficient for the purpose. Chemicals used as boiler water additives must meet the requirements specified in 21 CFR 173.301 – Boiler Water Additives.

Lubricants

Lubricants designed for incidental contact may be used on food processing equipment as a protective antirust film, as a release agent on gaskets or seals of tank closures, and as a lubricant for machine parts and equipment in locations in which there is potential exposure of the lubricated part to food. The amount used should be the minimum required to accomplish the desired technical effect on the equipment. If used as an antirust film, the compounds should be removed from the equipment surface, by washing or wiping, as required to leave the surface effectively free of any substance that could be transferred to food being processed. Lubricants designed for no contact may be used as a lubricant, release agent, or antirust film on equipment and machine parts or in closed systems (e.g., hydraulic systems) in locations in which there is no possibility of the lubricant or lubricated part contacting edible products.

Soluble oil products are chemically acceptable for application to hooks, trolleys, and similar equipment to clean and prevent rust. Those portions of the equipment that contact edible products must be made clean and free of the mixture before reuse.

If lubricants can contaminate food contact surfaces, they must meet the requirements specified in 21 CFR 178.3570 – Lubricants with Incidental Food Contact. These regulatory references can be confusing. For questionable substances, processors should seek advice from local authorities. The lubricant should be considered a potential contaminant if it is used on food-contact surfaces, on bearings and gears located on or within food-contact surfaces, or on bearings and gears that are located so that lubricants may leak, drip, or be forced into food or onto food-contact surfaces.

Pesticides and Rodenticides

Residual pesticide compounds must be used in a manner that prevents their entry into edible product areas through open windows, ventilating systems, etc. Before using controlled fumigants, all edible products and packaging materials must be removed from the room to be fumigated. After fumigation, the treated equipment and space must be thoroughly aerated to remove all vapors before personnel reenter the area. Food contact surfaces must be rinsed with potable water before edible products are returned to the room.

Restricted use pesticides shall meet the requirements specified in 40 CFR 152 Subpart I – Classification of Pesticides. Rodent bait shall be contained in a covered, tamper-resistant bait station. A tracking powder pesticide should not be used in a food establishment. Only a nontoxic tracking powder such as talcum or flour that will not contaminate food, equipment, utensils, and packaging materials may be used.
Other Compounds

Absorbents or antislip agents for spot application to floors may be used in all areas provided that use is limited to the portion of the floor area where the danger of slipping exists, and that such use does not result in dusting, tracking, or other objectionable conditions. Compounds should not be used as a substitute for good sanitation. They must be removed as a part of the routine floor cleaning operation.

Following the use of cleaning and/or degreasing solvents in nonprocessing areas, equipment and utensils must be thoroughly washed and rinsed with potable water before being returned to a processing area. Before using solvents for cleaning electronic instruments, adhesives and glue removers, food products, and packaging materials must be removed from the area or carefully protected. These compounds must be used in a manner so that all odors associated with the compound are dissipated before food products or packaging materials are in the area.

First aid supplies that are in a food establishment for the employees’ use shall be labeled and stored in a kit or a container that is located to prevent the contamination of food, equipment, utensils, and packaging materials. Only those medicines that are necessary for the health of employees shall be allowed in a food establishment. Medicines that are in a food establishment for the employees’ use shall be labeled as such and located in a manner to prevent the contamination of food, equipment, utensils, and packaging materials.

Employees should store their personal care items in facilities designed and set aside specifically for such uses.
Reference and Further Reading


### Sanitation Control Guide

<table>
<thead>
<tr>
<th>Entry date:</th>
<th>Toxic Compounds</th>
<th>FDA Key Condition No. 6</th>
</tr>
</thead>
</table>

**Concern:** Proper Labeling, Storage, and Use of Toxic Compounds

**Examples:**
A chlorine-based sanitizer is being poured into a bottle labeled as detergent. A finished product tray is being used as a “drip catch pan” during the application of a lubricant. The contaminated tray could inadvertently be used for packaging a seafood product. An employee applying insecticide in a dry storage room is using a chemical insecticide that according to the manufacturer’s instruction is only intended for outside use. A pallet of detergent is stored on top of a pallet of breading.

**Controls and Monitoring:**
All chemicals, including those used for cleaning the restrooms and office areas, shall be stored in a closed and locked cage in dry storage away from food packaging materials. Only authorized quality assurance and maintenance personnel will have access to the cage. All chemicals purchased for use in the facility must either be labeled to show the name of the manufacturer, instructions for use, and the appropriate EPA approval or documentation provided with the necessary information. Smaller working containers, such as used for hand sanitizing compounds, will be filled by authorized quality assurance or maintenance personnel only. Such containers will be properly marked with the common name of the substance and will not be stored in any way that may cause the compound to fall or drip into food or onto food packaging materials. **Frequency:** Daily, pre-op.

**Recommended Corrections:**
Improperly labeled, stored, or used working containers will be corrected immediately. Food containers or packaging materials should not be used for storing or handling toxic compounds. Any chemical compound not having label instructions or document instructions for proper storage and use will be placed on hold until such documentation may be obtained. If such documentation cannot be obtained, the compound will be returned to the supplier. Leaking containers shall be resealed or replaced as necessary. Order of the storage cage will be corrected by the next working day. Any misuse of chemical compounds will result in corrections and retraining as determined necessary. If potential contamination of food product or food packaging material is present, the affected material or product will be removed from the area and discarded or destroyed as applicable. Employees found not adhering to the policy on personal care items and medicines will be retrained.

**Records:**
Daily Sanitation Control Record Employee Training Records