

2016 Processing Plant Superintendent Updates

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Items to Discuss

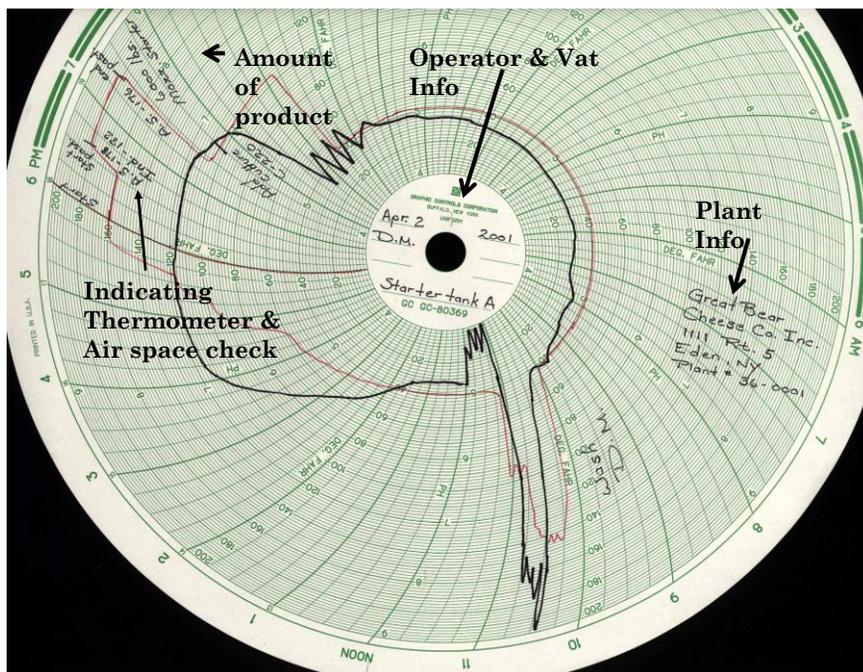
- Vat Pasteurizer Charts
- Equipment Design and Construction
- Product storage tank records
- 2015 NCIMS – PMO Changes
- Ratings
- Pest Control Issues

Vat Pasteurizer Chart Information – NOT LESS than the following:

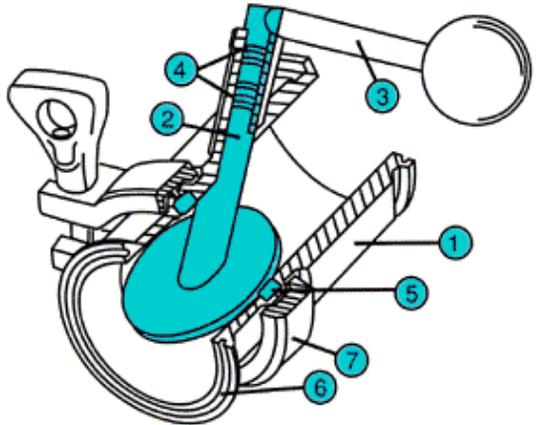
- Date
 - Vat Identification
 - Name of Dairy Plant
 - Signature or Initials of Operator
 - Name and volume of each product processed
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- Continuous record of the product temperature
 - Extent of holding time including fill and emptying times for HOT fill and emptying (cooled outside vat)
 - Air Space thermometer reading at start & end of holding period
 - Mark beginning of hold time – exact time
 - Reading of the indicating thermometer at the start of holding at a given time or reference point as indicated on chart
 - Record of any unusual occurrences
 - Pin hole in center of chart

Notations must be legible
otherwise they are not meaningful

Your chart, ***with proper notation***, is ***your*** proof that you properly pasteurized ***your*** product



Equipment Construction





Equipment Construction

- Materials:

- 300 series Stainless Steel 304 or 316 (not 301 / 302)

- **Surface Texture**

- **$R_a < 32\mu\text{in. (0.8}\mu\text{m)}$ = No. 4 Finish = 150 grit**

- **R_a = Average Roughness**

Note: Pasta Filata / Mozzarella – surfaces may be modified to

R_a 125 $\mu\text{in. (3.2}\mu\text{m)}$

- Aluminum & Copper (limited use)
- NO LEAD – white “dairy metal” contains up to 5%

- **Brass & Bronze not acceptable**

- Rubber & Plastic Materials – 3A Std. 18-03 and 20-20, also CFR 177.xxx

Equipment Construction

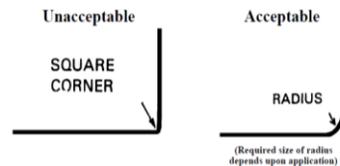
- Food contact surfaces free of sharp corners & crevices
- **Easily disassembled for cleaning**
- **Self draining**

There should be no threads on product contact surfaces except where necessary for non-permanent joints in piping and for making various attachments to equipment.

• Thread angle less than 60° and no more than 8 threads per inch (JP or John Perry fittings / bevel seat fittings) – manual clean

- **Proper radii on internal angles**

(1/4" on angles 135° or less)



- **Welds are continuous** / Surfaces not overlapped

Product Storage Records

- Cooling vs. Cleaning
 - Product not held at correct temperature for any period of time is a cooling violation (item 17p) – 5 points on rating
 - Product held in a storage tank longer than 72 hours is a cleaning violation (item 12a and 12c on inspection form) – 10 points on rating
 - Charts overlapped / incorrect notations – item 12b – 5 points on rating

Items from 2015 NCIMS

NCIMS Proposal 226

Updates PMO & 2400 Forms to Address EPA's new water std. that establishes a Maximum Contamination Level for E. coli




Revised Total Coliform Rule: A Quick Reference Guide

Overview of the Rule

Title*	Revised Total Coliform Rule (RTCR) 78 FR 10269, February 13, 2013, Vol. 78, No. 30
Purpose	Increase public health protection through the reduction of potential pathways of entry for fecal contamination into distribution systems.
General Description	The RTCR establishes a maximum contaminant level (MCL) for <i>E. coli</i> and uses <i>E. coli</i> and total coliforms to initiate a "find and fix" approach to address fecal contamination that could enter into the distribution system. It requires public water systems (PWSs) to perform assessments to identify sanitary defects and subsequently take action to correct them.
Utilities Covered	The RTCR applies to all PWSs.

* This document provides a summary of federal drinking water requirements; to ensure full compliance, please consult the federal regulations at 40 CFR 141 and any approved state requirements.

Public Health Benefits

Implementation of the RTCR will result in:

- ▶ A decrease in the pathways by which fecal contamination can enter the drinking water distribution system.
- ▶ Reduction in fecal contamination *should* reduce the potential risk from all waterborne pathogens including bacteria, viruses, parasitic protozoa, and their associated illnesses.

**Critical Deadlines and Requirements
For Public Water Systems**

Before April 1, 2016	<ul style="list-style-type: none"> ▶ PWSs must develop a written sample siting plan that identifies the system's sample collection schedule and all sample sites, including sites for routine and repeat monitoring. ▶ PWSs monitoring quarterly or annually must also identify additional routine monitoring sites in their sample siting plans. ▶ Sample siting plans are subject to state review and revision.
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NCIMS Proposal 226

Updates PMO & 2400 Forms to Address EPA's new water std.

Section 8r: Replaces "coliform bacteria with "E. coli"

Section 15p: Pasteurized Equivalent Water based on E. coli std.

Appendix G: Includes E. coli in testing protocol

"Water shall be tested for the presence of **total coliform & E. coli.**"

Corrective Action: When the laboratory report on the **sample is positive for total coliform but negative for the presence of E. coli** or indicates a Heterotrophic Plate Count of > 500 CFU/mL on a sample that had previously been invalidated, the water supply in question **shall be considered at risk for pathogenic contamination** and shall again be physically inspected & necessary corrections made until subsequent samples are bacteriologically satisfactory.

Corrective action - See Appendix G 2015 PMO pg. 222

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Appendix G: Includes E. coli in testing protocol

"Water shall be tested for the presence of **total coliform & E. coli.**"

•**Pasteurized Equivalent Water treatment systems that have undergone the "Hazard Evaluation and Safety Assessment" of subpart d. of this section prior to December 31, 2015 shall review their assessment based on the new E. coli water standards and submit any revisions or a statement that no revisions were needed to the Regulatory Agency by ~~April 1, 2016~~ October 1, 2016.**

NCIMS Proposals 211 & 213

DRUG RESIDUE TESTING:

- 211 is frame work for what will most likely be mandatory Non-Beta lactam testing
- 213 will cover any Non-Beta Lactam testing with unapproved test methods.
- This discussion is to introduce you to the language and concepts.
- **When 211 Pilot is complete and the details are finalized we'll have meetings to address the program changes.**
- ***Testing for drugs other than Beta Lactams will happen.***
- **Be careful buying anything before you are sure of the program details.**
- There shall be a documented agreement between Industry, Milk handlers and Regulatory.

NCIMS Proposal 211

DRUG RESIDUE TESTING – PILOT PROGRAM:

The Appendix N Modification Committee is charged to develop a pilot program, establishing a regulatory framework by which testing raw milk for veterinary drugs would be required for drugs other than beta-lactams. The program would include:

1. Drugs to be tested; based on FDA's risk-ranking (20/54)
2. Testing methodology; methods evaluated and accepted
3. Available methods; drugs tested for as methods avail.
4. Number of samples (no less than 1 in 15 bulk milk tankers)
5. Reduction of beta-lactam testing has been considered
6. National Milk Drug Residue Data Based reporting
7. Report of challenges of program implementation
8. A complete report to with recommendations by 2017 conf.

NCIMS Proposal 211

The Appendix N Modification Committee (ANMC) so Far

Specifics of the pilot that the ANMC are solid on **at this point in time**:

1. Tetracycline [may] the first drug of choice
2. Tests [might] occur on 1 in 15 loads of milk at any given facility at a minimum, however there is nothing to prohibit more testing if desired
3. All states and Puerto Rico are expected to participate
4. The testing regimen is anticipated to begin by the end of 2016 or beginning of 2017
5. The pilot is initially for bovine milk only

The committee is currently deeply entrenched in developing the remaining particulars of the pilot.

Hope this helps, ... Anonymous

NCIMS Proposal 213

DRUG RESIDUE TESTING:

- Addresses the procedure to follow when using a drug testing method that has NOT been evaluated and accepted by FDA and the NCIMS when there is a drug testing method AVAILABLE that has been evaluated and accepted by FDA and the NCIMS
 - M-a-85, latest revision; M-I-92-11
- Primarily addresses **Non-Beta Lactam** test methods
 - Ex. Charm Sulfa strip test method
- Add a new section to Appendix-N, “ VI “

Note: This Proposal shall take effect one (1) year from the issuance of the [IMS-a-50](#), Actions from the 2015 National Conference on Interstate Milk Shipment. ***IMS-a-50 was issued 11-16-15***

NCIMS Proposal 213

DRUG RESIDUE TESTING

Changes to Section 6

- Adds words “Beta Lactams” and term “Drug Test Kits” to Test Methods

Appendix N. II.

- sub-section a. modified - There ~~should~~ **shall** be ~~an~~ a documented agreement between the Regulatory Agency and industry that specifies how this notification is to take place. This notification shall be “timely” for example by telephone or fax, and supported in writing
- Sub-section d. All verified screening test positive loads using test methods not evaluated by FDA and accepted by the NCIMS without additional confirmation required shall be broken down (producer trace back) using the same test method.

Pest Control Issues

Notations made on inspections:

- Mouse droppings found on shelves in ingredient storage room
- Observed numerous flies in pasteurizer room
- Rat droppings were noted on the floor throughout the back storage room
- Spiders and cobwebs in processing area

Pest Control

- **Maintain a proper pest control program** - Contract with a reputable pest control company
- Reduce entrance areas
 - **Reduce openings** – use self closing doors, air curtains at receiving areas when doors are open
 - **Evaluate doors** – are they tight fitting all the way around the door
 - Windows properly screened if opened during warm weather – consider casement (non-opening) windows
 - **Lighting above doors should be avoided** – if it cannot then use low UV lights
- Maintain storage areas – items stacked and stored neatly, boxes sealed – reduces nesting / harborage areas
- Items on pallets and storage shelves are off the wall – allows for cleaning and keeps rodents from climbing over items
- Properly ventilate all storage rooms to reduce moisture

- **Maintain exterior** – keep weeds and other vegetation to a minimum, avoid landscaping within 30 feet of the facility
 - Avoid storing old equipment or other items outside of your facility – creates nesting / hiding / harborage areas for insects and rodents
- **Feed Storage** - minimize spillage