

CERTIFIED MILK INSPECTOR NEWSLETTER

September 2014

Issue 117

NEW YORK STATE
DEPARTMENT OF AGRICULTURE & MARKETS
DIVISION OF MILK CONTROL & DAIRY SERVICES
10 B AIRLINE DRIVE
ALBANY, NEW YORK 12235

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Editor's Note:

There have been many changes in Division of Milk Control staff in the over two years since the last edition of the CMI Newsletter was published. First, Dairy Products Specialists Mike Lennon and Bernie Cheney have retired; Mike in February of this year and Bernie in August. Their many combined years of service to the Division and to the dairy industry will be greatly missed. On the other hand we have been fortunate to be able to fill several DPS positions over the past two years. Patrick Mest (Region 1), Lyndsay Perryman (Region 1), Eric Glaude (Region 2), Heather Spraker (Region 3), Heather Torino (Region 5), Natasha Fay (Region 6), and Jacqueline Burke (Region 7) have all started working for the Division within the past two years and are proving to be outstanding hires for us who will hopefully be serving the industry for many years to come. If you get a chance, please introduce yourself to our newest staff members. Lastly in regards to Milk Control personnel changes, I was promoted to Program Manager in March after eleven years as a Regional Supervisor and Kennedy (Skip) Wilson has recently been promoted to Region 1 Supervisor to backfill that position. Skip has many years of experience and will be a great resource for CMIs in Western New York and the entire state.

Finally, I want to welcome all new Certified Milk Inspectors to the program. You are the regulatory authorities for dairy farm sanitation in New York and, as such, are a very important part of the overall dairy compliance program. I encourage you to communicate freely with your assigned DPS as open lines of communication will foster an attitude of cooperation which will benefit milk producers and processors in New York.

Sample Dipper Holders

Below is a letter which was sent to all bulk milk haulers and CMIs in early July. I have included it again in this newsletter as a reminder.

On August 13, 2013 FDA's Center for Science and Applied Nutrition (CFSAN) published a Memorandum of Interpretation (M-I-13-6) which contained questions from dairy regulators throughout the US and answers from CFSAN. One of those questions addressed the construction of holders used to store sampling instruments and sanitizing solution and is printed in its entirety below.

77. PMO-Appendix B, Section I

Would a sampling instrument (dipper) container, constructed from a three inch (3") diameter PVC pipe and capped at one (1) end, be acceptable for the storage of the sanitizing solution and the metal dipper used by the bulk milk hauler/sampler to collect the universal milk sample at individual dairy farms?

No. One (1) end of the PVC pipe container would be uncapped thus exposing the sanitizing solution and dipper to potential contamination during storage on the milk tank truck and when being used at the dairy farm. Also, the construction of the PVC pipe container, as observed, created an open seam that was not smooth and was not easily cleanable.

In the past New York's Department of Agriculture and Markets has taken no issue with PVC sampling

instrument containers as long as they were covered, clean, and in acceptable condition. However, given FDA's interpretation of acceptable construction and the fact that it is impossible to affix a bottom cap over a PVC pipe without creating a seam, the Department will no longer be able to accept the use of sampling instrument containers constructed of PVC pipe and caps. While there have been some discussions between Department personnel and samplers regarding this policy change no actual informational notice has been released until now, so the Department will accept a six (6) month period for milk receivers/samplers to transition to an acceptable sampling instrument holder. **After January 1, 2015 the use of PVC holders will be debited under *Sampling Instrument Case/Container – Proper Design, Construction, and Repair (Item 4 on Dairy Plant Milk Sampling Report or Item 14a on Bulk Milk Pick-up Sampling Report)*.**

Farm Equipment Application and Guidelines Update

Chris Hylkema, Dairy Equipment Specialist

At this time the form DMC 1517 Application to Install or Modify a Pipeline Milk or Transfer System and the form DMC 1569 Application to Install Milk Related Equipment are undergoing updating and revising. The final revised forms will also include supplemental applications for Direct Loading Operations as well as Automatic Milking Installations (a.k.a. robots). Also being revised are the documents "Installation of Farm Milk Pipelines" and "Refrigerated Bulk Milk Storage Tanks Installation Requirements". These documents are going to be combined into one document that will serve as a guideline for installers, CMI's and inspectors with information on applications, interpretations of Pasteurized Milk Ordinance (PMO) requirements and will include some reference material and links to information sources. However, until all of this is done we have what we have and we still need to make sure that applications are being submitted prior to the start of installations. If information is necessary for a particular installation but it is not listed on the application please be sure it is submitted as an attachment to the application. Some of this is highlighted in the following sections.

Update on Requirements for Direct Loading

Chris Hylkema, Dairy Equipment Specialist

All direct loading installations must meet the requirements of Item 5r and Appendix B of the PMO. An application to install equipment for a direct loading operation must be submitted for review by the Division of Milk Control prior to the start of the installation. When submitting an application for a direct load be sure that all of the required information is sent in including the line diagram, method for cooling the milk, temperature recording and monitoring system, the SOP for obtaining samples and the method for obtaining the milk weights. Also, there must be a description of the exterior conditions of the building including the length of the concrete pad, the drainage on the pad and the type of enclosure whether it be a full enclosure or a dock seal at the milk house.

There are some key points that need to be highlighted with regard to direct load operations. The first is the Standard Operating Procedure (SOP) for obtaining the producer's official sample. An SOP must be developed that is detailed and clearly outlines the process for obtaining a sample. This development can take some time and will need to be reviewed. It is important that you, as the CMI, get us involved early in the review process because there will most likely need to be revisions. We do not want to get into a situation where we are waiting to review revisions while the producer is trying to start up their operation. All of the information regarding sampling should be kept in a secure location where it is available to those that need access. A suggestion is that this information be kept in a binder. This binder could also serve to maintain milk temperature history records and accuracy checks of the thermometers used in the sampler refrigerator. More information and requirements for approved in-line samplers can be found in the FDA document M-I-06-6.

Another key point is obtaining milk weights. There has been much discussion in the last year with regard to the use of magnetic flow meters on direct load farms and who is responsible for validating these units. The NYS Dept. of Agriculture and Markets Division of Weights & Measures will not be conducting any initial or routine validation work on these flow meters. They have offered a draft of the requirements for the use of these on direct load operations which states, in part,

Bureau of Weights & Measures Requirements

1. Direct bulk milk metering systems used for commercial transactions shall meet the following requirements:
 - a. The measuring device shall meet the type approval requirements as described in 1 NYCRR part 220.1.
 - b. The appropriate municipal director of weights and measures is notified before use.
 - c. The measuring device and related accessories shall be installed, tested and maintained as per the requirements of National Institute of Standards and Technology (NIST) Handbook 44 "Specifications and Tolerances for Commercial Weighing and Measuring Devices".

Editor's note: On farms utilizing direct loading, the CMI is responsible for ensuring producer samples are taken, handled, and stored properly. Validation of proper sample handling equipment and records must be part of a CMI's inspection of direct loading farms.

Update on Automatic Milking Installations

Chris Hylkema, Dairy Equipment Specialist

All AMIs must meet the requirements of Appendix Q of the PMO as well as any other applicable requirements related to dairy farms listed in Section 7 of the PMO. As stated in the direct load update, an application must be submitted for the installation of an AMI. The forms currently in use are the DMC 1517 and DMC 1569 as already mentioned. As with the direct loads, neither of these forms is very specific to AMIs and they are currently being revised. In addition to the application the following information must be submitted for review: a detailed line drawing including the AMI room, milkhouse and facility showing access to the AMI room. Hot water requirements for washing the AMI as well as the bulk tank and the means to provide positive air pressure to the AMI room during all washes. Other information that will need to be accessible to regulatory at the farm includes the teat prep acceptance (FDA M-I), the block and bleed valve position test procedure, the milk hauler pick up procedure and the procedure for accessing milk temperature and wash history data. As with the

direct loads it is important that this information is maintained in a secure location while being readily accessible to those that need access. A well labeled binder is a suggestion for this maintenance.

There has been much discussion lately with regard to AMI operations revolving around the use of butterfly valves and the requirement for positive air pressure in the AMI room. In May 2014 FDA issued the final revision of their guidance document for AMIs, M-I-14-8. This M-I lists some very specific criteria with regard to interpretation of Appendix Q and how AMIs are to be evaluated by regulatory. One such statement prohibits the use of butterfly style valves in the block and bleed set up at the bulk milk storage tank. This set up protects the milk in the tank from CIP solution during an automated wash of the milk line and robot unit. The main reason for this is that butterfly valves are not designed to be CIP cleaned, they must be disassembled for proper cleaning. This brings up many questions with regard to their use on conventional systems but for now we need to deal with them on AMIs. We have been engaged in communication with the installers to come up with acceptable alternatives and for the most part we have been able to come to some agreement on what types of valves will be acceptable in these designs. At this time the NYS Dept. of Agriculture & Markets, Division of Milk Control has no intention of requiring any already completed and approved installation to change out their current block and bleed set up to eliminate the use of butterfly valves. This may of course change, but that is our stance for the time being.

With regard to positive air pressure, there currently is no standard and each installation is handled case by case. The only items that are certain is that the air system must run during all washes and the system must provide over pressure within the AMI room (higher pressure in the AMI room than in the animal housing area). This requirement will continue to be developed and hopefully we can come up with some standard evaluation practices that will satisfy everyone involved with the installations.

We will notify all of the CMIs and installers once the new applications and equipment installer guideline are ready for use. In the meantime, please contact the Regional DPS 2 supervisor in your area or the Division Equipment Specialist, Chris Hylkema (716-725-5080; Christopher.hylkema@agriculture.ny.gov), with any questions you may have.

Producer Reinstatement Following a Positive

Appendix N Test

Although thankfully it doesn't happen very often these days, when a load of milk is rejected by a processing plant due to a detected animal drug residue it is most often the CMI who must follow up with the offending producer. Over the past year, I have noticed a few instances where this follow up was not done properly so I would like to review the correct procedure. After the producer who created the positive load is identified during trace back testing, an inspection of the farm must be conducted to try and determine what procedural breakdown occurred which caused the drug to enter the bulk tank and what corrective action should be taken to prevent its reoccurrence. Next a reinstatement sample is taken by a licensed milk receiver (often the CMI) who then transports the sample with a temperature control and chain of custody documentation to a certified laboratory. The sample must then be tested **by the same or equivalent method** as the original test method used during the trace back testing. What this means is that if a producer is found positive during trace back testing on a test method that is able to detect six beta-lactam drugs, such as the Charm SL-3, then the reinstatement sample must be tested by a method which also detects six beta-lactam drugs. The Charm SLBL and Idexx Snap methods only detect five beta-lactam drugs and thus would not be suitable for reinstatement testing in the example above. FDA's M-a-85 (revision 14) gives a table of approved drug residue tests and the types and concentrations of drugs they detect but if you are in any doubt about test method equivalency, contact your assigned DPS.

Plastic Buckets Used as Milk Pails

According to one of our rating officers the re-use of plastic buckets for transporting (saleable) milk from the milking stable to the milkhouse is becoming increasingly common especially on small or non-electric farms. These buckets may be used to transport milk to calves or other animals but may not be used to transport or store saleable milk. Milk pails for transporting milk to the bulk tank (or cans) must be constructed of smooth, nonabsorbent, corrosion resistant, non-toxic material and must be of an easily cleanable design. Pails must also be properly covered during transport. Single service plastic buckets do not meet this criteria.

CMI Update Schedule- Mark your Calendars

September 29, 2014 – Monday – 1:00pm to 4:00pm

Cornell Cooperative Extension (2nd floor meeting room)
21 South Grove St., East Aurora, NY 14052

September 30, 2014 – Tuesday – 9:00am to 12:00pm

NYS Fairgrounds – Art & Home Center (Broadway Bistro Room)
581 State Fair Blvd., Syracuse, NY 13209

October 1, 2014 – Wednesday – 9:00am to 12:00pm

St. Lawrence – Lewis BOCES Building (Conference Room A)
40 West Main St., Canton NY 13617
(Rt.68 before SUNY Canton entrance if headed toward Ogdensburg)

October 2, 2014 – Thursday – 9:00am to 12:00pm

NYS Dept. of Agriculture & Markets
10 B Airline Drive, Albany, NY 12235
Directions: Take I-87 to Exit 4 to Albany Shaker Rd, go West to the 3rd light, (just past Airport). Take left onto Rte. 155, take left at Airline Drive (10B is ¼ mile on left).

****All attendees must sign in at Receptionist desk****

Program Agenda

Steve Murphy – Sr. Extension Associate, Cornell University
Standards for Raw Milk Beyond the Regulations - Thermotolerant, Spores, Sediment & Drugs

Kennedy "Skip" Wilson – Dairy Products Specialist, NYS Dept. of Ag & Mkts.
Certified Milk Inspectors Role & Standard Operating Procedures for Sampling

Chris Hylkema – Dairy Products Specialist, NYS Dept. of Ag & Mkts.
IMS Rating Issues / Review of new Farm Equipment Installation Applications & Guidelines