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SETTING THE STANDARD IN SEAFOOD SAFETY



Packaging Warehouse Review

Company Name: Frontier Packaging Inc.

Company Location: 1201 Andover Park East, Suite 101, Tukwila, WA 98188

Contacts:

Michelle Talley, Customer Service Supervisor
Sharon Olanrewaju, Purchasing and Cred Manager
Chris Moore, Production Manager

Date of Review: June 15, 2018

Products:

Packaging Materials
Salt Products

Reviewer:

Christopher E. Rezendes
President
Seafood Products Association

Summary:

Since the last review in June 2016, the company has made great strides in establishing written standard operating procedures covering the warehouse and distribution operations. The company is not audited under the BRC Global and Distribution Standard Issue 2; however, the company's standard operating procedures address virtually all elements. The Company's practices applicable to warehouse and distribution operations were reviewed and determined to be in good standing to ensure safe, quality and legal products to their customers.

A handwritten signature in black ink, appearing to read 'C. Rezendes', is written in a cursive style.

Key:

- Yes = Yes, satisfactory and/or no recommendation made
 No = No, needs improvement and/or recommendation made
 N/A = Not applicable and/or not available for assessment and/or not covered

	Yes	No	N/A
1 Hazard and Risk Assessment			
a. HACCP team in place	x		
b. HACCP team represents all appropriate multidisciplinary components of the plant	x		
c. HACCP team meets periodically	x		
d. HACCP team meetings are documented	x		
e. There is a current flow chart of the process			x
f. The flow chart is reviewed, signed and dated on an annual basis			x
g. The company has conducted a hazard analysis	x		
h. Significant hazards have been identified by the hazard analysis		x	
i. Company operates under a written HACCP Plan			x
j. Plan includes all critical control points identified by the hazard analysis			x
k. Plan includes critical limits for each critical control point in the plan			x
l. Critical limits are appropriate for the hazard identified at the critical control point			x
m. Plan includes monitoring procedures for the critical control point			x
n. Monitoring procedures are appropriate for the critical control point			x
o. Critical limit monitoring forms are appropriate for monitoring the critical control point			x
p. Critical control point monitoring is documented and records maintained			x
q. Verification procedures are appropriate for the critical control point			x
r. HACCP plan has been implemented as written			x
<p>Comments/Notes:</p> <p>a. Team includes Michelle Talley, Chris Moore and Sharon Olanrewaju.</p> <p>c. Any issues would be discussed at safety meetings. Meeting notes are maintained</p> <p>e. and f. Products are simply received, stored and shipped.</p> <p>g. and h. No food safety hazards were identified in the warehousing and distribution of packaging materials and packaged salt. No HACCP plan is required.</p> <p>i.-r. Not required since no HACCP plan is required for food safety hazards.</p>			

		Yes	No	N/A
2	Building			
	a. A plant diagram is available	X		
	b. Interior floors, walls, ceilings, overhead pipes and other structures are clean and in good repair	X		
	c. Ceilings, walls and overhead pipes are free of flacking paint, condensate and other contaminants	X		
	d. Storage areas are clean and organized	X		
	e. Vehicles and other conveyances used in the facility, e.g., forklifts, are clean and in good repair	X		
	f. Floor drains are protected to prevent entry of pests			X
	g. Floor drains are clean and unblocked			X
	h. Trash receptacles are properly maintained	X		
	i. Receiving and shipping dock areas are clean	X		
	j. Products protected from glass breakage	X		
	k. Adequate lighting is available to enable effective operations	X		
	l. Adequate ventilation is available	X		
	m. Doors and windows to the exterior are maintained to exclude pests	X		
	n. Door and window screens are in place and in good repair	X		
	o. An 18-inch perimeter is maintained in the storage areas	X		
	p. Sufficient work space exists to enable operations	X		
	q. Position of machinery and equipment does not jeopardize products	X		
	r. Battery charging area is ventilated and segregated from products			X
	s. Cleaning facilities are segregated from products	X		
	t. Loading doors are protected from weather damage, i.e., covered bays	X		
<p>Comments/Notes:</p> <p>f. and g. There are no floor drains.</p> <p>j. Written Glass and Brittle Plastic Breakage Program in place.</p> <p>m. New, flexible rubber seals have been installed on the roll-up doors. Man doors have no gaps at base.</p> <p>o. Concrete perimeter barriers are in place to prevent storage directly against the walls.</p> <p>r. Forklifts operate on propane, not batteries.</p>				

		Yes	No	N/A
3	Exterior			
	a. Exterior of the building is free of litter and trash	X		
	b. Exterior of the building is free of weeds, vegetation and other harborage areas	X		
	c. Exterior of the building is free of standing water	X		
	d. Pallets, equipment and other materials are properly stored to prevent pest harborage	X		
	e. Building location is free of adverse environmental factors that could impact on products	X		
Comments/Notes: d. The dumpster is located on the West side of the building and was closed. It was an attractant or harborage for pests. Large bags of salt destine for destruction are stored adjacent to the dumpstter. e. The building is surrounded by other large business buildings with no impact on the products.				

		Yes	No	N/A
4	Staff Facilities			
	a. Good Manufacturing Practices (GMP) guidance provided	X		
	b. GMP program covers wearing of jewelry, no smoking/eating/drinking, etc., as applicable	X		
	c. GMPs are communicated to the employees, contractors, visitors	X		
	d. Employees exhibit good GMPs	X		
	e. Restrooms are supplied with adequate hot water, soap, towels or other means to dry hands and trash receptacles; signage in appropriate languages	X		
	f. Restrooms are easily accessible to staff and vehicle drivers	X		
	g. Protective clothing is provided to the employees, contractors, visitors			X
	h. Changing facilities are provided for employees, contractors, visitors			X
	i. Designated area established for smoking	X		
	j. Employees do not store personal items in processing area	X		
Comments/Notes: a-b. These issues are discussed during safety meetings, as deemed necessary. Last monthly safety meeting was on 5/31/2018. e. and f. Restrooms are provided in office area, shipping area and south end of the warehouse. Handwashing Policy is in place. g. There is a Safety PPE Program in place. i. Smoking is only allowed on exterior of the building. Ash tray devices are provided for smokers.				

	Yes	No	N/A
5 Pest Control			
a. Pest control program in place	X		
b. Frequency of contracted service is:	Monthly		
c. Contracted service includes interior,	X		
d. Contracted service includes exterior	X		
e. Contracted service includes rodents	X		
f. Contracted service includes insects	X		
g. Contracted service includes birds		X	
h. Contracted service includes insect light traps or devices	X		
i. Pest Control Official's (PCO) manual is current, e.g., contract, dated map, license, insurance, SDS, labels, pesticide usage, service reports		X	
j. Interior traps are numbered and location identified	X		
k. Exterior traps are numbered and location identified	X		
l. Insect light traps are numbered and location identified			X
m. Bulbs in insect light traps are changed out annually			X
n. PCO service reports are reviewed by management	X		
o. PCO observations are corrected and documented	X		
p. Pest control chemicals are properly stored			X
q. Warehouse observed to be free of pests	X		
r. Trend analysis is completed	X		

Comments/Notes:

a. A Pest Program is in place.

e. 36 rodent traps and 9 bait stations. No evidence of activity was observed.

f. Ants are included in the pest monitoring program.

g. If necessary, contracted pest control company will provide service for birds. No evidence of activity was observed.

i. Company is serviced by Sprague. The program was last reviewed on 1/6/2017. A review of the documents in the manual determined several had expiration dates:

- License 8/31/2017
- Insurance 1/1/2015
- Pest Control Officers license 12/31/2017
- Map 3/4/2016

Also, the service report for 3/29/2018 indicated 3 bait stations have rodent and/or mice activity but the affected bait stations were not identified nor whether control chemicals had been applied.

Approved Chemical List was dated 1/8/2016 and identified four chemicals; SDS documents were in the manual for the items.

Recommend reviewing deficiencies with Pest Control Officer.

l. and m. Insect light traps are not used. Insect sticky traps are used in select area.

p. Pesticides are not stored at the warehouse. The PCO administers any required items.

	Yes	No	N/A
6 Employee Break/Lunch Room and Locker Rooms			
a. Break room conditions are acceptable	X		
b. Pest control device is present in the room	X		
c. Locker room conditions are acceptable	X		
Comments/Notes:			
a. Covered by written Housekeeping Program.			
b. Each break room has a rodent trap and insect device.			

	Yes	No	N/A
7 Raw Materials and Packaging Materials			
a. Vendor approval program in place	X		
b. There is an official list of approved vendors	X		
c. Alternate vendors are allowed in emergencies	X		
d. There are written raw material specifications	X		
e. There are written packaging material specifications	X		
f. Vendors are periodically audited	X		
g. Vendor audit procedures are: A Certificate of Compliance is received with each delivery of salt. Product specifications and/or SDS documents are received for products.			
h. Water is from an approved source	X		
i. First-in, first-out (FIFO) policy practiced	X		
Comments/Notes:			
a. Written Supplier Approval Program has been implemented. Company has had the same vendors of packaging materials and salt for many years and a list is maintained.			
b. List of vendors documents whether they operate under HACCP, have a recall program, etc.			
d. and e. Product specifications are obtained and placed on file before any actual purchasing.			
h. No water is used in the operation of the warehouse. Potable water source is from the City of Tukwila.			

		Yes	No	N/A
8	Receipt of Goods			
	a. Receipt of goods program in place	X		
	b. Procedures are in place to ensure temperature requirements of goods have been meet before accepting into warehouse			X
	c. Products are inspected upon receipt for pest infestation, contamination, or damage	X		
	d. Inspections are documented in records	X		
Comments/Notes: a. A written Receiving Program is in place. b. Warehoused products do not have any special temperature requirements. c. and d. Vehicle inspection program covered by written Housekeeping and Workplace Safety Program. Adverse conditions documented on Bill of Lading, by exception.				

		Yes	No	N/A
9	Product Handling			
	a. Product handling program in place	X		
	b. Personnel are aware of products requiring special handling and are trained in appropriate procedures	X		
	c. Products are loaded in a manner that prevents damage and secured to prevent movement during transit	X		
	d. Products are stored off the floor on pallets and/or racks	X		
Comments/Notes: a. and b. Loading procedures are only performed by experienced personnel. Extensive training required for the position.				

		Yes	No	N/A
10	Records			
	a. Records program in place	X		
	b. There is a version control process	X		
	c. The reason for change is documented	X		
	d. There is a record retention period established for records	X		
	e. Records are completed in blue or black ink	X		
	f. White-out is not allowed	X		
	g. Records show management's review and date, if applicable	X		
Comments/Notes: a. Written program is in place. d. Company policy is to retain records for five years. Documents associated with food potentially subject to a recall by the vendor are retained indefinitely.				

		Yes	No	N/A
11	Chemical and Lubricant Controls			
	a. Chemical program in place	X		
	b. Chemicals are inspected upon receipt for condition	X		
	c. Chemical inspections are documented in records	X		
	d. Chemicals are properly stored under secured conditions	X		
	e. Chemicals are properly labeled	X		
	f. Material Safety Data Sheets are on file for all required materials	X		
	g. Chemicals are used in accordance with manufacturer's recommendations	X		
<p>Comments/Notes:</p> <p>a. Company has a written Hazard Communication program. No toxic chemicals are used or stored in the warehouse. A Lubrication Program is also in place.</p> <p>f. SDS documents are on file for ink, silicon spray and other non-toxic materials; 13 for warehouse items, 24 for housekeeping and one for propane.</p>				

		Yes	No	N/A
12	Physical Controls			
	a. Glass and other physical hazards program in place	X		
	b. Glass inspections are conducted on a periodic basis	X		
	c. Glass inspections and incidents are documented in records	X		
	d. Snap-blade knives are prohibited in the warehouse	X		
	e. Spill control procedures are in place to prevent cross-contamination	X		
	f. Procedures in place to prevent cross-contamination of allergens			X
	g. Wooden pallets used for finished products are managed to eliminate staples and other potential contaminants	X		
<p>Comments/Notes:</p> <p>a.-c. A written Glass and Brittle Plastic Breakage Control Program is in place.</p> <p>f. No allergens are stored in the warehouse.</p> <p>g. Heat treated pallets are used, as specified by customers. Pallet repair is completed by employees.</p>				

		Yes	No	N/A
13	Sanitation Program			
	a. Sanitation program in place	X		
	b. Sanitation procedures cover the major areas of the warehouse	X		
	c. Sanitation procedures cover vehicles and other conveyances used in the facility, e.g., forklifts	X		
	d. Sanitation inspections are performed on a periodic basis	X		
	e. Sanitation inspections are documented and records maintained	X		
	f. Cleaning equipment and chemicals are properly stored between uses	X		
<p>Comments/Notes:</p> <p>a. Company has written Housekeeping and Workplace Safety Programs in place. Daily items include sweeping warehouse floor, cleaning bay door levelers, emptying trash cans, breakroom conditions and checking the exterior.</p> <p>c. Company has a forklifts inspection program based on manufacturer's recommendations.</p> <p>d. and e. Daily inspections are conducted pre-operations, during operations and post operations by the managers. Any adverse conditions identified are discussed with appropriate personnel, responsibility for correction assigned and correction verified. Typically, events are documented in e-mails.</p>				

		Yes	No	N/A
14	Customer Complaints			
	a. Customer complaint program in place	X		
	b. Customer complaints are investigated	X		
	c. Customer complaint investigations are documented and records maintained	X		
	d. Trend analysis is conducted on customer complaints			X
<p>Comments/Notes:</p> <p>a. Company has a written Customer Complaint Program for of investigating and responding to customer complaints. Management personnel are responsible for investigating and resolving complaints.</p> <p>d. Trend analysis unnecessary due to no food safety complaints. No food safety complaints reportedly received in past year.</p>				

		Yes	No	N/A
15	Recall and Traceability			
	a. Recall program in place	X		
	b. Recall program is written document	X		
	b. Recall team represents all multidisciplinary components	X		
	c. Recall team meets at least annually	X		
	d. Recall team meetings are documented and records maintained	X		
	e. Recall program identifies team member responsibilities	X		
	f. Mock recalls are conducted at least annually	X		
	g. Goals are established for mock recalls	X		
	h. Mock recalls are documented and records maintained	X		
	i. There are procedures to trace back raw materials	X		
	j. Mock traceability exercises are conducted at least annually	X		
	k. Mock traceability exercises are documented and records maintained	X		
	l. Goals are established for mock trace backs	X		
<p>Comments/Notes:</p> <p>a. Company has written programs for conducting recall and trace back for food products: Salt Trace Procedure and Traceability and Recall Procedure. Program includes recovery percentage and retrieval time goals (90% in 8 hours). Recall team consists of Sharon Olanrewaju, Chris Moore and Amandeep Kaur. Program was successfully implemented for the Cargill market withdraw of 2017.</p> <p>Mock recalls are conducted at least annually. The last exercises was conducted on 6/12/2018:</p> <p>Item 519-06-004, Medium Salt 50 lbs. KD Lot No. 26017ADBAA Start 2:50pm, End 3:17pm=12 minutes 784 units received on 3/19&2018 via P.O. 4016596 and 4016623 449 units shipped via P.O. 2033378, 2034503, 2034881, 2035287 and 2034932 335 in inventory 100% recovery Completed documentation collected and on file.</p> <p>On-Site mock exercise conducted during the review:</p> <p>Item 519-06-006, Flow-Ever Fine Blending Lot 22716ADBAA Start 11:07am; End 11:30am=23 minutes 343 units received on 7/10/17 and 4/23/2018 via P.O. 4013659 and 407174 294 units shipped via P.O. 2027157 and 2027902 49 in inventory 100% recovery</p>				

		Yes	No	N/A
16	Preventative Maintenance			
	a. Preventative maintenance program in place	X		
	b. There is a master schedule for all equipment requiring preventative maintenance, e.g., forklifts, fire devices and dock plates	X		
	c. Preventative maintenance requirements are identified for each item	X		
	d. There are means to track and document completion of preventative maintenance	X		
Comments/Notes: a. Written program is in place. Forklifts are the primary equipment used in the warehouse operations. A pre-inspection checklist is completed as per a written Pre-Inspection Checklist Program. b. – d. Preventative maintenance is performed on the propane-driven fork lifts and records maintained. Comprehensive report received from Toyota-Lift after each service for each unit. Last service was performed on 6/19/18.				

		Yes	No	N/A
17	Training			
	a. Training program is in place	X		
	b. All employees receive training before starting work and are supervised	X		
	c. Employee training is documented	X		
	d. HACCP critical control monitors receive specific training			X
	e. Staff competency is periodically evaluated to determine need for training, refresher training, coaching, mentoring or on-the-job training	X		
Comments/Notes: a. Company has a training program for warehouse related issues to meet requirements of basic GMPs, sanitation, safety and security (OSHA, L & I, etc.). Training is provided by managers and/or contracted service providers during safety meetings. Last monthly safety meeting was on 5/31/2018 (Chris Moore, Jerry Hagerstrom, Chris Pierce and Sharon Olanrewajn). d. No HACCP plan required for warehouse operations.				

		Yes	No	N/A
18	Internal Audit			
	a. Internal audit program in place	X		
	b. Internal audits are performed on a periodic basis	X		
	c. Internal audits are documented and records maintained	X		
	d. Auditors are independent of activity being audited	X		
	e. Audits are performed by qualified personnel	X		
	f. Corrective action taken for deficiencies	X		
	g. The warehouse is audited by a GFSI third-party company		X	
Comments/Notes: c. The company's internal audit consists of the annual mock recall and traceability exercise for salt products. Internal audit is conducted annually by SPA that covers food safety, traceability and good manufacturing practices.				

	Yes	No	N/A
19 Waste Disposal			
a. Containers are in place to collect waste materials	X		
b. Compactor and/or dumpster is kept closed	X		
c. Area around the compactor and/or dumpster is clean	X		
d. Licensed contractor is used for disposal of waste	X		
e. Products requiring special handling are separated and disposed legally			X
Comments/Notes:			
b. Compactor used for recycling cardboard and in located in the south end of the warehouse.			
e. No special handling of waste items is required. Waste is limited to cardboard, paper and plastic strapping and similar items.			

	Yes	No	N/A
20 Food Defense Program			
a. Plant defense (security) program in place	X		
b. There are procedures for:			
Employee entry controls	X		
Visitor sign-in/sign-out	X		
Procedures to accompany visitors	X		
Identification of visitors, e.g., badge		X	
Door security procedures, e.g., lock keys, keypads, keycards)	X		
Computer security	X		
c. A site assessment has been completed		X	
d. The firm conducts periodic security inspections	X		
e. Monitoring cameras, motion detectors and/or other security systems are in use	X		
f. Background checks are performed on new employees	X		
g. Warehouse has fenced perimeters		X	
h. Defense Team represents all multidisciplinary	X		
i. Defense Team meetings are held on a periodic basis	X		
j. Defense Team meetings are documented and records maintained	X		
k. Program has list of emergency contacts for utility and government contacts in the event of product tampering, natural disaster, etc.	X		
Comments/Notes:			
d. Doors are checked at the close of business.			
e. Company has an internal motion detection system in place and is monitored by Washington Alarm.			
a., h. – j. Company has a safety team. Warehouse security is discussed during periodic management meetings.			
A warehouse door on the East side of the warehouse was left open.			
Recommend reminding employees to secure all doors when not in use.			

Firm Name: Frontier Packaging, LLC
 Date: June15, 2018

		Yes	No	N/A
21	Senior Management			
	a. Dated organization document that defines the company structure and responsibilities	X		
	b. Senior management provides human and financial resources to operate the warehouse	X		
	c. Senior management ensures objectives are established for storage and distribution of products to maintain product safety, quality and legality	X		
	d. Senior management holds meetings with key staff members to review and discuss (1) resources; (2) results of internal, customer and independent external audits; (3) complaints; (4) corrective actions; and/or (5) incidents/ rejections/returns	X		
	e. Management meetings are documented	X		
	f. Meeting decisions are communicated to appropriate staff and corrective action documented, when necessary	X		
Comments/Notes:				
Senior management meets on a quarterly basis and on an ad hoc basis to address specific problems.				

Firm Name: Frontier Packaging, LLC
Date: June 15, 2018

Concrete barriers are in place along perimeter of warehouse



Man doors were tight fitting with no gaps.



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Bags of salt are properly stored on good pallet boards.



Salt destined for destruction are stored on the West side of the facility.



Firm Name: Frontier Packaging, LLC
Date: June15, 2018

A man door on the East side of the warehouse was left open.

