

## 01B02 Procedure

The 01B02 SSOP procedure is a review and observation procedure for verifying pre-operational sanitation. When performing the review and observation procedure, you should verify all four requirements: implementation (monitoring), maintenance, corrective actions, and recordkeeping.

You must understand the procedures in the SSOP that the establishment is implementing to prevent direct contamination or adulteration of product to effectively verify that the establishment is meeting the regulatory requirements. Therefore you should review the SSOP to ensure that you are familiar with the current written pre-operational sanitation procedures and become familiar with any monitoring procedures and frequencies that may be included in the SSOP.

If you perform the 01B02 procedure and have reviewed the SSOP, you should verify the pre-operational sanitation requirements by: 1) observing the establishment conducting its monitoring, 2) performing an organoleptic examination of some of the establishment's facilities, equipment, and utensils to assess sanitary conditions (hands-on), and 3) comparing your findings with the plant records.

NOTE: On Saturdays, Sundays, and Holidays, CSIs are to conduct pre-operational sanitation procedures in the same manner and frequency as they do during the week.

Before going into the establishment to assess the sanitation in one or more areas by performing the 01B02 procedure you should:

- Select the area or areas of the plant where you will perform the inspection.
- In processing departments, select a piece or pieces of equipment in one or more rooms or departments of the establishment.
- If you select a part of the establishment where ready-to-eat product is prepared as one of the departments where you will perform this procedure, you should start in that part of the plant first to prevent spreading microorganisms from the raw product departments of the plant.
- In slaughter operations, you select inspection units. Selecting inspection units in slaughter operations will not be discussed in this training.
- Have a good flashlight.
- Have a pen or pencil.

- Have U.S. Rejected/U.S. Retained tags and some means (tape, string, rubber bands) of affixing these tags to equipment, departments, product, etc.
- Have a notepad to record your pre-operational findings.

If you have not been properly trained in lockout/tagout, you must not perform pre-operational sanitation procedure 01B02 on any machine or piece of equipment that must be locked out.

When you go to an area of the establishment to perform the 01B02 procedure, you should inspect direct contact surfaces of equipment, facilities, and utensils after the establishment has completed its monitoring. It is possible that you and the establishment might be in the same area at the same time. This provides you an excellent opportunity to observe the establishment conducting its monitoring. When you are observing the establishment conducting its monitoring procedures, you should verify that the monitor is inspecting to find problems and not just going through the motions. You should be verifying that the monitoring activity is being conducted as is written in the SSOP.

In some cases, the establishment might conduct monitoring of the implementation of the SSOP procedures before inspection personnel arrive at the establishment. In these situations, you should ask your supervisor how frequently you should directly observe the establishment conduct the monitoring. The supervisor will consider several factors when making this decision: 1) establishment compliance history, 2) documentation in the FSIS file, and 3) information from SSOP records.

When you have determined the equipment, facilities, and utensils that you will inspect, you should examine direct contact surfaces to determine that they are organoleptically clean. This means that the direct contact surfaces look clean, feel clean, and smell clean. You should visually examine the contact surfaces for product residues that might be left from previous days' operations. You should feel the contact surfaces to determine if there are residues present from previous days' operations that are not visible. You should be aware of any odors in these areas that may represent insanitary conditions.

Direct contact surfaces must be clean prior to operations to ensure the food that is produced is safe, wholesome, and unadulterated. If direct contact surfaces are contaminated with residues from previous days' operations, it is likely that these conditions will harbor microorganisms as well. Clean means that the contact surfaces are free of foreign material such as fat, blood, hair, rust, grease, and cleaning chemicals.

When you are assessing the sanitary condition of equipment and utensils prior to operation, you should look at those areas that are the most difficult to clean.

These are the areas that are most likely to be missed when the establishment implements the procedures in its SSOP. These difficult areas are the areas that are also likely to be overlooked by the establishment's monitoring procedures. Other areas that are not direct contact surfaces can also be a source of product contamination and should be inspected. For example, condensation, peeling paint, and scaling rust from overheads where products are processed, handled, or stored can contaminate products. In other words, you should inspect the environment in those areas you have selected to verify the products can be produced safely.

When you have completed your assessment of the sanitation in one or more areas of the plant, you should compare your findings to the establishment's sanitation findings. If the written records are not completed at the time you have completed this procedure, you may ask the establishment about its preoperational findings and any actions taken.

If, after the establishment has completed its monitoring, you find any direct product contact surfaces or product that is contaminated, you should take a regulatory control action on that equipment or product. The establishment has the responsibility to take corrective actions that meet the requirements in §416.15. You should not remove the regulatory control actions until the establishment has proposed corrective actions, either verbally or in writing, that meet these requirements.

You should be aware that there are times the responsible plant employee might not be able to propose permanent preventive measures immediately. However, in these situations, the establishment should propose what they will do to determine a remedy.

**Example:**

For example, you identify a condensation problem in an area of the establishment that is contaminating product. You retain the product in the area and reject that area for use. When you notify the responsible establishment employee of the problem, he tells you that there is a structural problem in that area that will cost several thousand dollars to repair. He further explains that he does not have the authority to have the structure repaired. He states he will bring it to the attention of the plant owner and will inform you of the preventive measures that the owner proposes. You agree this is logical and when the appropriate disposition is made on the product and sanitary conditions in that area are restored, you relinquish the regulatory control actions. All of these corrective actions should be recorded in the plant records. You should keep notes of your findings while performing this procedure so that you can accurately document them on the NR.