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# Audit Report

## FSNS Beef Trim CCP Addendum

**Harris Ranch Beef Company**  
16277 South McCall Avenue  
Selma, California 93662

**Audit Date:** September 19, 2023  
**Auditor:** Rudy Hernandez



## Audit Summary

Company Name:	Harris Ranch Beef Company	Company ID:	AUHARRIS
Address:	16277 South McCall Avenue Selma, California 93662		

Contact Name:	Emily Krage
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Audit ID:	AO-007040
Audit Date:	September 19, 2023
Audit Type:	Annual audit
Audit Result:	Completed

Auditor Name:	Rudy Hernandez
Auditor Phone Number:	970-405-0369
Auditor Email Address:	rudy.hernandez@fsns.com

Definitions for the purpose of this Addendum:

Validation - Data that demonstrates there is a pathogen kill when an intervention is operating within specified parameters.

Verification - Demonstration of a microbiological reduction by an intervention when operating in validated parameter(s).

Monitoring - Checking / reading of intervention parameters / measurements (ex. Temperature, concentration, etc.).

PLEASE NOTE: A "NO" answer does not necessarily represent a deficiency in a facility's programs or processes.



# Beef Trim - CCP Addendum

## 1 HACCP

		Result
<b>1.1</b>	Adequacy of the HACCP plan is reassessed by the establishment on an annual basis or whenever changes occur that could affect the hazard analysis or alter the HACCP plan. Review the establishment's HACCP reassessment log to identify the last reassessment.	yes
Comment: HACCP plans were reassessed annually or when changes occurred, most recently on 09/07/2023.		
<b>1.2</b>	The establishment maintains records to demonstrate that responsible personnel have been trained in monitoring activities as described in their HACCP plan.	yes
Comment: Employees were trained at hire, when entering the position, and annually for monitoring activities as described in the HACCP Plan. Training records from YTD 2023 were reviewed.		
<b>1.3</b>	The establishment maintains records that confirm corrective actions are taken when there is a deviation from a critical limit.	yes
Comment: Corrective action procedures were referenced and established, which met requirements identified within 9 CFR 417.3. In the event of a CCP deviation, the implicated product was isolated, root cause analysis performed, and corrective actions and preventive measures completed. Corrective actions for zero tolerance and CCP C-1B failures were reviewed and evidenced program compliance.		

## 2 Interventions/Process Aids - Steam Vacuum

		Result
<b>2.1</b>	The establishment uses the steam vacuum intervention method.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.2</b>	The establishment identified this intervention as a CCP.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.3</b>	If the Steam Vacuum is a CCP, can the line run if this intervention is not operational or not in specification.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.4.1</b>	None	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.4.2</b>	Validated Third Party Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.4.3</b>	In-house Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not utilized.		



<b>2.4.4</b>	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.4.5</b>	Resource white paper (Published Journal Article)	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.4.6</b>	Resource white paper with third party review (peer reviewed paper - not published)	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.4.7</b>	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.5.1</b>	A specific set of samples were chosen to support the validation hypothesis (objective).	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.5.2</b>	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.5.3</b>	Scientific support documentation.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.5.4</b>	Validation study was prepared by a third party. List the name of the third party in comments.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.5.5</b>	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.6</b>	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.7.1</b>	The establishment has documented procedures that include the following:  Operation of this intervention method	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.7.2</b>	Temperature monitoring	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.7.3</b>	Vacuum monitoring	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.7.4</b>	Steam pressure monitoring	Not Applicable
Comment: Steam vacuums were not utilized.		
<b>2.7.5</b>	Removal of contamination (Must follow regulatory guidelines of 'less than one inch')	Not Applicable

Comment: Steam vacuums were not utilized.

<b>2.7.6</b>	Maintenance of the intervention equipment	Not Applicable
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Comment: Steam vacuums were not utilized.

<b>2.7.7</b>	Observation of the intervention in operation	Not Applicable
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Comment: Steam vacuums were not utilized.

<b>2.7.8</b>	None of the above.	Not Applicable
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Comment: Steam vacuums were not utilized.

<b>2.8</b>	Operators of the steam vacuum(s) are following documented procedures as written for this intervention. If no, list findings in comments.	Not Applicable
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Comment: Steam vacuums were not utilized.

<b>2.9</b>	The establishment's intervention operating parameters fall within the validation supporting documentation parameters	Not Applicable
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Comment: Steam vacuums were not utilized.

### 3 Interventions/Process Aids - Thermal Intervention

		Result
<b>3.1</b>	The establishment uses the Thermal (hot water or steam pasteurization) intervention method.	yes
Comment:	The facility used a 180°F hot water pre-evisceration carcass wash, and a hot water pasteurization cabinet.	
<b>3.2</b>	The establishment identified this intervention as a CCP.	yes
Comment:	Hot water pasteurization was a CCP.	
<b>3.3</b>	If the Thermal (hot water or steam pasteurization) intervention is a CCP, can the line run if this intervention is not operational or not in specification.	no
Comment:	The line could not operate without hot water pasteurization.	
<b>3.4.1</b>	None	Not Applicable
<b>3.4.2</b>	Validated Third Party Challenge Study or Validation Study	yes
Comment:	Investigation of the use of 1,3-Dibromo-5,5-Dimethyl Hydantoin (DBDMH) In Beef Harvest Interventions. Bullard et. al. (2018)	
	In house Study -Scott et al., 2014 Bullard et al., 2018 Validation of Changes to HACCP CCP-S-1 Operating Parameters Due to Facility and Equipment Improvements.	
<b>3.4.3</b>	In-house Challenge Study or Validation Study	yes
Comment:	Shaving cream 2/23/2023 and food-grade ink study 4/13/2023.	
<b>3.4.4</b>	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	Not Applicable
<b>3.4.5</b>	Resource white paper (Published Journal Article)	yes

Comment: Comparison of Water Wash, Trimming, and Combined Hot Water and Lactic Acid Treatments for Reducing Bacteria of Fecal Origin on Beef Carcasses - Journal of Food Protection, Vol. 61, No 7, 1998, Pages 823-828.

<b>3.4.6</b>	Resource white paper with third party review (peer reviewed paper - not published)	no
<b>3.4.7</b>	Other -- List in comments	yes
Comment:	Castillo et al., 1998 Kochevar et al., 1997 Scott et al., 2015 Kalahayand et al., 2006 Bosilevac et al., 2006 USDA-FSIS Inspection Procedures 6350.1, 1996 Manufacturer's Calculations	
<b>3.5.1</b>	A specific set of samples were chosen to support the validation hypothesis (objective).	yes
Comment:	Specific sample sets were utilized.	
<b>3.5.2</b>	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	yes
Comment:	Log reduction of <i>Salmonella typhimurium</i> , <i>Escherichia coli</i> O157:H7, Aerobic Plate Counts, Enterobacteriaceae, total Coliforms, Thermotolerant Coliforms, and generic <i>E. coli</i> supported the conclusion.	
<b>3.5.3</b>	Scientific support documentation.	yes
Comment:	Microbiological test results supported the conclusion.	
<b>3.5.4</b>	Validation study was prepared by a third party. List the name of the third party in comments.	yes
Comment:	Dr. Brittny Bullard - Colorado State University.	
<b>3.5.5</b>	Other -- List in comments	Not Applicable
<b>3.6</b>	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	yes
Comment:	Ongoing verification included CCP monitoring, shaving cream tests, ink tests, temperature data recording device attached to a carcass passed through the cabinet minimally twice daily, temperature decals attached to carcasses passed through the cabinet randomly, daily carcass mapping (sampling of carcasses post hide removal, pre and post evisceration, and post interventions) for APC, generic <i>E. coli</i> , and Coliforms, and sampling of one out of every 300 carcasses for generic <i>E. coli</i> .	
<b>3.7.1</b>	Operation of this intervention method.	yes
Comment:	Preventive maintenance instructions documented operation methods.	
<b>3.7.2</b>	Training records for the maintenance of this intervention equipment.	yes
Comment:	Training records were available for the maintenance of the pre-evisceration and hot carcass washes.	
<b>3.7.3</b>	Checking the nozzles to ensure that they are not plugged and that they are all functioning.	yes
Comment:	Nozzle function was observed during CCP monitoring.	



<b>3.7.4</b>	Checking the position of the arbors (are they moving correctly, or if stationary, are they aimed correctly).	yes
Comment: Nozzle function was observed during CCP monitoring.		
<b>3.7.5</b>	Start-up and shut-down procedures.	yes
Comment: Pre-Evisceration/Hot Beef Wash/Lactic Acid Startup and Shut Down Process defined startup and shut down procedures.		
<b>3.7.6</b>	There is documentation of a monitoring process that assures that the water or steam is as least 160°F at the carcass surface.	yes
Comment: A temperature data recording device attached to a carcass was passed through the cabinet minimally twice daily to verify minimum 160°F water temperature for 14 seconds and 170°F for 10 seconds. Temperature decals attached to carcasses were passed through the cabinet randomly to verify 170°F at the carcass surface.		
<b>3.7.7</b>	The establishment monitors dwell time.	yes
Comment: Dwell time was monitored.		
<b>3.7.8</b>	The establishment ensures that all areas and/or surfaces of the carcass are adequately covered by water or steam.	yes
Comment: Carcass coverage was verified during shaving cream tests and CCP monitoring		
<b>3.7.8</b>	The establishment documents monitoring of start-up and shut-down.	yes
Comment: Start up and shut down were monitored and documented during preventive maintenance.		
<b>3.8</b>	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	yes
Comment: Hot water temperature was 207°F during the assessment, with nozzles functioning properly.		

#### 4 Interventions / Process Aids -- Chemical Applications

		Result
<b>4.1</b>	The establishment uses Chemical Application(s) as an intervention method.	yes
Comment: The facility used lactic acid and Bovibrom.		
<b>4.2</b>	NOTE: Answer the following questions for each designated CCP.	yes
The establishment identified this intervention as a CCP. If YES, identify the location of the application (ex. Post-evis lactic acid).		
Comment: Lactic acid on carcasses post hot water pasteurization was a CCP.		
List each intervention chemical (ex. Lactic acid, peracetic acid, chlorine, Sanova, SYNTRx) being utilized and the location of use. Verify that the establishment has FSIS Regulatory approval or other record of approval for the chemical(s) in use. Identify CCPs with parentheses.		

Lactic acid was applied to the carcass after the hot water beef wash (CCP). Bovibrom was applied before the carcass was chilled and before entering fabrication. Lactic was applied on the midline during hide removal and on the heads/tongues/tails/hearts/check meat/head meat. Lactic acid was used in fabrication on trimmings, belts, and primals. These were approved through FSIS Directive 7120.1.

**4.3** If the Chemical Application is a CCP, can the line run if this intervention is not operational or not in specification. no

Comment: The line could not run without the carcass lactic acid application.

**4.4.1** None Not Applicable

**4.4.2** Validated Third Party Challenge Study or Validation Study yes

Comment: Investigation of the use of 1,3-Dibromo-5,5-Dimethyl Hydantoin (DBDMH) In Beef Harvest Interventions. Bullard et. al. (2018)

In house Study -Scott et al., 2014 Bullard et al., 2018 Validation of Changes to HACCP CCP-S-1 Operating Parameters Due to Facility and Equipment Improvements.

**4.4.3** In-house Challenge Study or Validation Study no

**4.4.4** Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments. no

**4.4.5** Resource white paper (Published Journal Article) yes

Comment: Antimicrobial Efficacy of a Lactic Acid and Citric Acid Blend Against Shiga Toxin-Producing *Escherichia coli*, *Salmonella*, and Nonpathogenic *Escherichia coli* Biotype I on inoculated Pre-rigor Beef Carcass Surface Tissue - Journal of Food Protection, Vol 78, No 12, 2015, pages 2136-2142

**4.4.6** Resource white paper with third party review (peer reviewed paper - not published) no

**4.4.7** Other -- List in comments Not Applicable

**1** A specific set of samples were chosen to support the validation hypothesis (objective). yes

Comment: Specific sample sets were chosen for the study.

**2** Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion. yes

Comment: Statistical parameters were used in the validation to demonstrate a log reduction of pathogenic strains of *E. coli*.

**3** Scientific support documentation. yes

Comment: Microbiological test results supported the conclusion.

**4** Validation study was prepared by a third party. List the name of the third party in comments. yes

Comment: Dr. Britney Bullard - Colorado State University.

**5** Other -- List in comments Not Applicable

**4.5.1** The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments. yes



Comment: Ongoing verification included CCP monitoring, shaving cream tests, ink tests, temperature data recording device attached to a carcass passed through the cabinet minimally twice daily, temperature decals attached to carcasses passed through the cabinet randomly, daily carcass mapping (sampling of carcasses post hide removal, pre and post evisceration, and post interventions) for APC, generic *E. coli*, and coliforms, and sampling of one out of every 300 carcasses for generic *E. coli*.

<b>1</b>	The establishment has documented procedures that include the following:  Operation of this intervention method, including application of the treatment	yes
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Comment: Preventive maintenance records documented operational parameters for the intervention including preparation of solutions, start up, and shut down tasks.

<b>2</b>	Preparation of the treatment solution(s)	yes
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Comment: Preventive maintenance records documented operational parameters for the intervention including preparation of solutions, start up, and shut down tasks.

<b>3</b>	Start up of the intervention equipment	yes
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Comment: Preventive maintenance records documented operational parameters for the intervention including preparation of solutions, start up, and shut down tasks.

<b>4</b>	Shut down of the intervention equipment	yes
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Comment: Preventive maintenance records documented operational parameters for the intervention including preparation of solutions, start up, and shut down tasks.

<b>4.6.1</b>	The establishment monitors and has set lower limits on the concentration of the treatment solution. Specify in the comments if TITRATION or CONDUCTIVITY is used to monitor the solution concentration.	yes
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Comment: Chemical concentrations were verified by titration. Lower and upper limits were established and monitored by FSQA.

<b>4.6.2</b>	The establishment monitors the temperature of the treatment solutions.	yes
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Comment: Temperature monitoring was a part of CCP monitoring.

<b>4.6.3</b>	The establishment monitors the flow / volume	no
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Comment: Such was not monitored.

<b>4.6.4</b>	The establishment monitors the nozzle pressure.	yes
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Comment: Nozzle pressure was included in CCP monitoring.

<b>4.6.5</b>	The establishment ensures all areas and/or surfaces of the carcass are adequately covered by the chemical application.	yes
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Comment: Coverage was included in CCP monitoring.

<b>4.6.6</b>	The intervention method is implemented as written in the documented procedure.	yes
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Comment: Lactic acid concentration, pressure, and temperature were within acceptable limits at the time of this assessment.

<b>4.7</b>	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	yes
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Comment: Operating parameters were within validated limits.

**4.8.1** Is / Are there alternative intervention methods(s) being utilized other than those listed in the previous pages no

Comment: Novel interventions were not utilized.

## 5 Dressing Procedures / Critical Job Tasks

		Result
<b>5.1</b>	Is there an intervention or process aid utilized upon entering or exiting the out rail.	yes
Comment: Bovibrom was applied to carcasses exiting the out rail.		
<b>5.2</b>	The establishment designates and has documented descriptions of critical job tasks (i.e., skinning line, evisceration, etc.).	yes
Comment: Critical job tasks were defined in Work Instructions which were developed for each carcass dressing position.		
<b>5.3</b>	The establishment uses hot water or chemical solution to sanitize equipment (i.e., knife, steel, hook, etc.) during operations.	yes
Comment: 180°F hot water sterilizers were used to sanitize equipment during operations.		
<b>5.4.1</b>	The establishment uses the following to ensure that knives are in the sanitizer dip long enough to sanitize: List which methods are utilized in which process i.e. multiple knife rotation on skinning line, 1-2 second dip post skinning, etc.  Knife blade stays in the dip 1-2 seconds.	yes
Comment: Multiple knife rotation was used throughout the process		
<b>5.4.2</b>	Knife blade stays in the dip 2-3 seconds.	no
Comment: Multiple knife rotation was used throughout the process		
<b>5.4.3</b>	Knife blade stays in the dip for 4-6 seconds.	no
Comment: Multiple knife rotation was used throughout the process		
<b>5.4.4</b>	Multiple knife rotation.	yes
Comment: Dual knife rotation was used from initial sticking through final carcass trim out.		
<b>5.5</b>	The establishment sanitizes all equipment (hooks and knives) between each use to reduce cross contamination in the process when trimming visible contamination (i.e., fecal, hair, or dirt.).	yes
Comment: Tools and equipment were sanitized between carcasses or when trimming visible contamination.		
<b>5.6</b>	There is an auditing / observation process for monitoring of critical job tasks	yes
Comment: Job Performance Training Checklist were completed four times per shift.		
<b>5.7.1</b>	Type(s) of monitoring at the establishment:  Auditor	yes



Comment: QA monitored dressing procedures.

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<b>5.7.2</b>	Supervisor	no
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Comment: Supervisor audits were not conducted.

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<b>5.7.3</b>	Video	yes
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Comment: Job performance audits using cameras were completed on each position minimally daily and recorded on the Job Performance Training Checklist. Records reviewed from the week of 4/24/2023 demonstrated compliance.

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<b>5.7.4</b>	Other -- List in Comments	Not Applicable
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<b>5.8</b>	The Auditor declares that he/ she does not have a conflict of interest with this auditee and the audit has been carried out independently and impartially.	yes
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Comment: I, Rudy Hernandez, do not have a conflict of interest with the auditee.