

**Establishment Inspection Report**

Bravo Farms Cheese, LLC

Traver, CA 93673

FEI: 3003550969

EI Start: 11/04/2010

EI End: 12/01/2010

**ADDENDUM**

DATE: 12/29/10

The following addendum was created to add additional information to the section title in the EIR as Supporting Evidence and Relevance of Objectionable Conditions and Management's Response:

**OBSERVATION 1 (Page Numbers 27 through 29)**

Supporting Evidence and Relevance:

- The diagram of the processing/packaging facility demonstrates the potential for cross contamination between processing of cheese and the packaging of aged, ready-to-eat cheese.

We were informed by management that the firm manufactures raw milk cheese at the same time that they package aged, ready-to-eat cheese. The processing employees were observed using the door near the packaging area to exit the processing/packaging room while cheese was being packaged. This double door is opened with bare hand contact by both processing and packaging employees due to its heavy weight.

The primary door used by cheese processing and packaging employees is the double door in the packaging area. Employees working in the processing area must pass through the packaging area to exit the room. We observed processing and packaging employees throughout the inspection using this same double door in the packaging area a majority of the time to leave and return from breaks, transport young cheese and aged, ready-to-eat cheese, and bring equipment into the processing area. These double doors are made of heavy plastic and we observed employees using their bare hands or body to open the doors on 11/5/10.

Since there is no hand washing station in the packaging area, the employees packaging cheese must use the hand washing sink in the processing area then cross back into the packaging area to return to work. The sanitizing bath that we observed employees using was also located in the processing area of the room.

All of the processing and packaging of young and aged, ready-to-eat cheese is done with employee's bare hands (**Exhibit #25**). During the cheddaring process, employees with observable hair on their forearms were observed mixing cheese with their bare hands, including their forearms in direct contact with the cheese curds. Mr. Boersma informed us that there is no practical way to use gloves during this process of mixing the curds.

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There is only a single hand washing station located in the processing area near the pasteurizer. Please see the diagram below.

(b) (4)



- The photograph below illustrates the areas, outside of the facility where employees must cross with uncovered cheese to access the brining room.

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(b) (4)



IMG\_0490.jpg-Copy of photograph taken of storage trailer. Roll-up door observed open through-out the inspection

Exhibit #36, Photo #0490

Discussion with Management:

Mr. Van Ryn stated the brining operation has been moved from the outside room into the facility. This is the only statement made by Mr. Van Ryn on this observation.

**OBSERVATION 2 (Page Numbers 30 and 31)**

Supporting Evidence and Relevance:

Review of the copies of the breakdown of the Packaging Log to determine 60 day aging requirement (**Attachment #17**) demonstrates the discrepancies indicated above. The table above represents instances where cheese was packaged prior to 60 days of aging as determined by a review of the Packaging Log.

Discussion with Management:

Mr. Van Ryn stated that cheese will not be cut prior to the 60 days of aging and that the firm will implement a verification step. This will be implemented as of 12/1/10. This was the extent of the discussion of this point by the firm's management.

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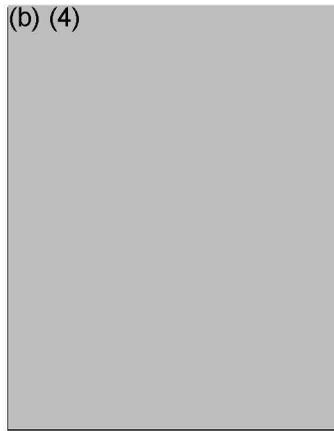
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**OBSERVATION 3 (Page Numbers 32 to 34)**

Supporting Evidence and Relevance:

- Below are the photographs of one of the carts used to transport young unpackaged cheese and aged, ready-to-eat cheese, in the hallway leading to the hallway packaging area.



IMG\_0555.jpg-Copy of photograph taken of cart used to transport young cheese to the brining room, processing room, and aging rooms.

Exhibit 37, Photo #0555

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(b) (4)



IMG\_0525.jpg-Copy of photograph taken of cart used to transport young cheese to the brining room, processing room, and aging rooms.

Exhibit #37. Photo #525

- On 11/4/10, Investigator Centeno observed (b) (4) processing/packaging employees transporting young, unpackaged Tulare Cannonball cheese on a grey colored plastic, two-tiered cart to the brining room. This cart was then observed on 11/5/10, in the aging cellar where young and aged, ready-to-eat cheese is stored.
- On 11/10/10, Investigator Galvez observed the four tiered cart in the packaging area being used to transport young cheese. See photograph above.
- Review of “Make Sheet” records and “Packaging Log” records 6/1/10 through 9/2/10 show the firm is packaging young cheese on the same day, in the same room, and using the same equipment to packaged aged, ready-to-eat cheese (**Exhibit #12 and #32**). The firm’s “Make Sheets” dated 6/1/10, 6/8/10, 6/16/10, 7/7/10, 7/13/10, 7/20/10, and 9/1/10 for Dutch Style Gouda show that the firm brines cheese for (b) (4) hours and then package the cheese after the (b) (4) hours. The firm’s “Packaging Log” shows that on 6/2/10, 6/9/10, 6/17/10, 7/8/10, 7/14/10, 7/21/10, 9/2/10 the firm packaged aged, ready-to-eat cheese.
- On 11/5/10, Investigator Centeno observed condensation on the ceiling of the Processing room while product was being manufactured in uncovered Vat (b) (4). The firm was processing chipotle flavored cheese at the time of this observation. The product was then placed in hoops for pressing. Then the product was prepared for aging. The vat has no cover over it as to protect product.
- Photographs below illustrate the close proximity of the open public men’s restroom door which may be accessible to free roaming animals as shown by the cat in the photograph.

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This restroom is for public use not for processing/packaging employees. The red door is an employee entry to the facility.



IMG\_0586 jpg-Copy of Photograph taken of cat roaming freely near the processing facility

IMG\_2055 jpg-Copy of photograph of public men's restroom near the door to the processing facility. This restroom was regularly used by employees



Employee door is kept unlocked

Exhibit #37, Photo #0586

Exhibit #35, Photo #2055

- Investigator Fukuda tested the chlorine levels in the footbaths located at both entrances of the processing/packaging room with chlorine test strips, they both tested with 0ppm for chlorine.
- Investigator Galvez observed the relocated foot bath and watched employees moving the cart through the doorway.

**Discussion with Management:**

Mr. Van Ryn stated there will be a new COP list and a segregated cart for aged cheeses and unaged cheeses. He stated that he would start working on this as of 12/1/10. There were no responses to the other items within this observation.

**OBSERVATION 4 (Page numbers 34 to 38)**

**Supporting Evidence and Relevance:**

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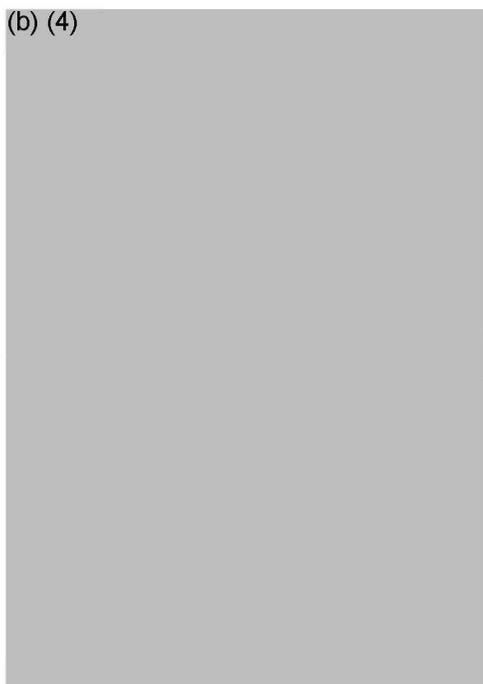
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- The photographs below illustrate the observable gaps on both entry doors. This door leads to the processing area, it is the door located near vat <sup>(b)(4)</sup> The third photograph is the fly observed during the environmental sampling on 11/5/10, at the time the firm was processing chipotle flavored cheese. The firm's vats are not covered; cheese is exposed to the processing area environment. When asked about the excessive fly activity observed on 11/4/10, Mr. Van Ryn replied to Investigators Centeno and Fukuda that fly activity heightens during warmer weather and activity was much higher during August when the weather got very hot. There were no observations of any controls for fly activity, such as fly screens.

(b) (4)



IMG\_2047.jpg-Copy of photograph taken of gap around the door near cheese Vat <sup>(b)(4)</sup>

Gap, ~1"

Exhibit #35, Photo #2047

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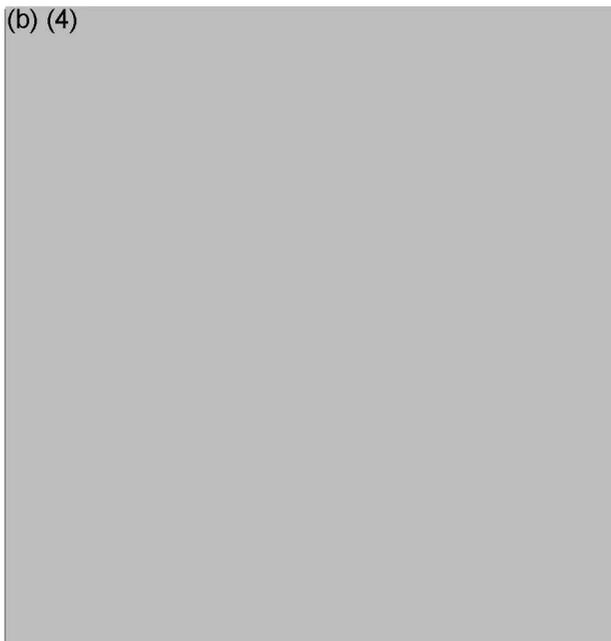
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(b) (4)



IMG\_2044.jpg-Copy of photograph taken of the gaps at the bottom hinges of the double door near the packaging area.

Gaps

Exhibit #35, Photo #2044

(b) (4)



IMG\_2028.jpg-Copy of photograph of fly observed on Va (b) (4) during cheese production on 11/05/10.

Exhibit #35, Photo #2028

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- The photograph below is the rabbit that Investigator Galvez witnessed coming out of the storage trailer. This was the same rabbit observed in the donkey corral and in the picnic area, as the photographs indicate below. One pallet was observed in brining room containing items to be destroyed.



IMG\_0487.jpg-Copy of photograph taken of black rabbit roaming freely near the brining room and storage trailer.

**Exhibit #36, Photo #0487**

- The photographs below, taken on 11/10/10, is of the same rabbit seen coming out of the storage trailer.

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IMG\_0575 jpg-Copy of photograph taken of black rabbit roaming freely in the donkey pen.

MG\_0589 jpg-Copy of photograph taken of black rabbit roaming in the picnic area used by the public.

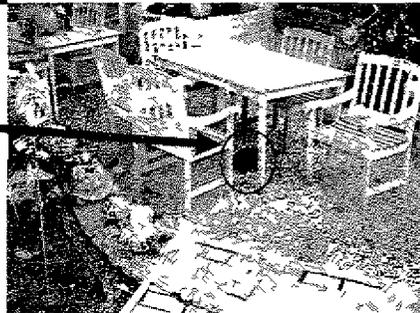


Exhibit #37. Photo #0575

Exhibit #37, Photo #0589

**OBSERVATION 5 (Page number 39)**

Supporting Evidence and Relevance:

- On 11/5/10, during the environmental sampling of the firm, Investigators Centeno and Galvez observed an employee improperly washing and sanitizing his apron. Employees splashed water from the utensil sanitizing vat located in the processing onto their aprons prior to returning to vat <sup>(b) (4)</sup> where chipotle flavored cheese was being manufactured.
- On 11/29/10, processing/packaging employees stated to Investigators Fukuda and Galvez that aprons were not to be worn outside of the processing/packing area, but these employees admitted that they may wear their aprons to pick-up raw materials outside of the processing/packaging area.

**OBSERVATION 6 (Page 40)**

Supporting Evidence and Relevance:

As per the firm's Personal Hygiene guideline #4 (**Exhibit #8**), employees are required to use a clean apron because the aprons may become a food contact surface. When employees were

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processing cheese on 11/5/10, we observed aprons coming into direct contact with young cheese being mixed in Vat<sup>(b) (4)</sup>

**OBSERVATION 7 (Page number 40)**

Supporting Evidence and Relevance:

As per the firm's Personal Hygiene guideline #1 (**Exhibit #8**), employees are required to always wash hands: After touching the face, hair (including a beard or moustache), or any unwashed body part; after smoking, eating, drinking, or taking any break; after any other activity that could potentially contaminate hands. It is important for employees to properly wash and sanitize their hands, since their hands come into direct contact with young and aged ready-to-eat cheese during processing and packaging.

**OBSERVATION 8 (Page number 41)**

Supporting Evidence and Relevance:

As per the firm's Personal Hygiene guideline #1 (**Exhibit #8**), employees are required to always wash hands: After any other activity that could potentially contaminate hands. Employees must use door handles to open doors when exiting the facility and entering the brining room. Employees must handle young cheese during the brining process with their bare hands. Employees must use door handles to enter and exit the brining room. The entrance door to the brining room is exposed to the open environment near the shipping and receiving dock area.

Discussion with Management:

Mr. Van Ryn stated the brining operation has been moved from the outside room into the facility. This was Mr. Van Ryn's only statement.

**OBSERVATION 9 (Page number 41)**

Supporting Evidence and Relevance:

As per the firm's Personal Hygiene guideline #5 (**Exhibit #8**), Keep hair neat and clean; use hair restraints (caps/hairnets). No loose, long hair. Beards and moustaches kept trimmed. Employee's unrestrained facial hair has the potential for contaminating the aged, ready-to-eat cheese during packaging.

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Joanne M. Fukuda, Investigator



Steven M. Galvez, Investigator



Elva M. Centeno, Investigator



Reviewed By: James C. Henry, SCSO