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Operation: Packinghouse CB Registration No. PA-PGFS-5413-2 PrimusGFS
Corrective Action Report PrimusGFS ID #72744 – Cert:3 Version 2.1
 Audited by Primus Auditing Operations

Organization: **Nickey Gregory Company LLC**
Contact(s): Vicki Gilbert
Address: 16 Forest Pkwy. Bldg. N 30297
Location: Forest Park, Georgia, United States
Phone: 404-366-7410

Packinghouse: **Nickey Gregory Company-Miami**
Contact: Vicki Gilbert
Location: 1930 NW 23rd St. Miami, Florida 33142, United States

Shipper: Nickey Gregory Company LLC
Operation Type: **Packinghouse**
Date FSMS Started: 23 Sep 2015 13:30
Date FSMS Finished: 23 Sep 2015 14:45
Date Operation Started: 23 Sep 2015 07:15
Date Operation Finished: 23 Sep 2015 15:15

Product(s) Observed During Audit:
 Lettuce, Romaine Lettuce, Bananas, Broccoli, Strawberries, Celery, Cabbage, Fruits, Peaches, Bell Peppers, Cucumbers, Raspberries, Artichokes, Squash, Kale, Cauliflower, Parsley, Cilantro, Blackberries, Radish, Anise, Apples, Asparagus, Avocados, Bok Choy, Carrots, Beans, Chard, Peas, Dates, Garlic, Grapefruit, Green Beans, Onions, Honeydew Melons, Kiwi Fruit, Leeks, Lemons, Mangoes, Mushrooms, Mustard Greens, Cabbage Napa / Celery Cabbage, Okra, Oranges, Papayas, Pineapples, Plums, Winter Squash (Hard Squash), Watermelons, Watercress, Collard Greens, Nectarines, Blueberries, Cantaloupe Melons, Sweet Potatoes, Vegetables, Lemon Grass, Table Grapes, Peppers, Chili Pepper, Microgreens, Radish Sprouts, Parsnips, Coconuts, Ginger, Rhubarb, Tomatillo, Dragon Fruit (Pithaya), Rambutan, Sweet Corn, Edible Flowers, Speciality Lettuce, Cabbage Chinese, Chili Pepper Dried, Bulb Onions, Limes, Brussels Sprouts, Endive, Culinary Herbs, Jicama Frozen, Broccoli Rabe/Rapinni, Turnip Greens / Turnip Tops, Green Onions/Salad Onions/Scallions, Mandarins/Tangerines, Eggplant / Aubergine, Beets / Beetroot, Daikon / Lo Bok Mooli / White Radish, Rutabagas / Swedes, Potatoes, Summer Squash (Soft Squash)

Similar Product(s) Not Observed:
Product(s) Applied for but Not Observed:
Auditor: [Galen Frantz](#) (Primus Auditing Operations)
Audit Percentage Score: **97%**
Score after acceptance of corrective actions: **99%**
GPS Coordinates: **Latitude:** **Longitude:**
 25° 47' 53" 80° 13' 40"

Certificate Link: [View Certificate](#)

Audit Scoring Summary	Pre-Corrective Action Review	Post-Corrective Action Review
Food Safety Management System Requirements	Score: 204 Possible Points: 204 Percent Score: 100%	Score: 204 Possible Points: 204 Percent Score: 100%
Good Manufacturing Practices Requirements	Score: 1013 Possible Points: 1045 Percent Score: 96%	Score: 1042 Possible Points: 1045 Percent Score: 99%
HACCP System Requirements	Score: 60 Possible Points: 60 Percent Score: 100%	Score: 60 Possible Points: 60 Percent Score: 100%
Total:	Score: 1277 Possible Points: 1309 Percent Score: 97%	Score: 1306 Possible Points: 1309 Percent Score: 99%

Non-Conformance Summary By Count	Pre-Corrective Action Non-Conformances	Post-Corrective Action Non-Conformances (NC's without completed CA's)
Food Safety Management System Requirements	0	0
Good Manufacturing Practices Requirements	10	1
HACCP System Requirements	0	0
Total:	10	1

GMP – Pest Control

2.17.07 Are pest control devices maintained in a clean and intact condition and marked as monitored (or bar code scanned) on a regular basis?

Auditor Answer: Minor Deficiency **Approved**

Auditor Comments: Minor. Bait station # 17 was broken. Other traps and bait stations were clean and intact. Monitoring cardss were up to date.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Because of ongoing issues, Nickey Gregory Company–Miami has changed pest control vendors as of 10–1–15. Outside bait station #17 has been replaced. Please see attached picture

[File 1](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes. Following replacement of bait station #17, all traps and bait stations were clean and intact. Monitoring cards were up to date.

2.17.09 Are all pest control devices identified by a number or other code (e.g. barcode) ?

Auditor Answer: Minor Deficiency **Approved**

Auditor Comments: Minor. Bait station #6 was incorrectly marked. Tin cats 12 and 87 lacked identifiers. Remaining devices were marked with identifiers that corresponded to wall placards indicating their intended locations.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Bait station #6 is now correctly marked and also tin cats 12 and 87. I met with our new pest control technician who will be responsible for servicing our facility to let him know our expectations along with the documentation requirements. Please see the attached pictures of 6, 12 and 87.

[File 1](#)

[File 2](#)

[File 3](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes, following re-marking of bait station #6 and tin cats 12 and 87 all devices were marked with identifiers that corresponded to wall placards indicating their intended locations.

GMP – Operational Practices

2.19.02 Are all exposed materials (product, packaging etc.) protected from overhead contamination (e.g. ladders, motors, condensation, lubricants, walkways, loose panels, degrading insulation, etc.)?

Auditor Answer: Minor Deficiency **Approved**

Auditor Comments: Minor. Packing materials, including pre-made cartons, stored just outside the repacking room were not kept covered. Overhead contamination risks were not observed in other parts of the facility.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Repack boxes, flats and folded, located on the back dock outside of the repack room are now being covered with banana bags until they are moved into the repack room. The repack associates have been trained – training documents attached.

- [File 1](#)
- [File 2](#)
- [File 3](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes. Packing materials, including pre-made cartons, stored just outside the repacking room are now kept covered with plastic sheets. Overhead contamination risks were not observed in other parts of the facility.

GMP – Buildings and Grounds

2.24.03 Has the facility eliminated the use of wooden items or surfaces?

Auditor Answer: Minor Deficiency **Approved**

Auditor Comments: Minor. A single instance of a wooden handle on a toilet plunger.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

The plunger with the wooden handle that was located in the restroom downstairs has been replaced with one with a thick plastic handle. Please see attached picture.

- [File 1](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes. With the replacement of a wooden handled toilet plunger, all wooden items or surfaces have been eliminated.

2.24.06 Are floor surfaces in good condition, with no standing water, no debris trapping cracks and are they easy to clean?

Auditor Answer: Major Deficiency **Approved**

Auditor Comments: Major. Standing water was noted beside the ice machine in the forklift path at the entrance to the wet room. This created a splashing hazard. Product stored near that location did not appear to have been impacted by splashing water. Unsealed post holes were found in the floor beside tin cat 67

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

The sanitation crew are now using the floor scrubber at least 2–3 times a day to vacuum up water in doorway to wet box. Also, to prevent any product from being splashed or possible contamination, the floor in corner near doorway has been painted yellow with signs that product CANNOT be stored in that area (see attached pictures). Employees have been trained NOT to put any product in this area (see attached documentation). Also the post holes near tin cat 67 have been sealed (see attached picture)

- [File 1](#)
- [File 2](#)
- [File 3](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Minor Deficiency

CB Comments

Minor. A small area of standing water in the doorway to the wet box presents risks of splashing or tracking waterborne contaminants to other parts of the facility. These risks are mitigated, but not eliminated, by frequent water removal, and by not storing food items within the splash zone around the standing water. Unsealed post holes have been sealed.

2.24.12 Are interior walls and ceilings free of cracks and crevices to prevent pest harborage and allow proper sanitation?

Auditor Answer: Minor Deficiency

Approved

Auditor Comments: Minor. A gap behind the wall panel in the corner beside tin cat 53 presented potential pest harborage.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

The wall panel with the gap in it has been screwed in closing the gap. Please see attached picture

[File 1](#)

[File 2](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes, the wall gap has been repaired.

2.24.15 Is the exterior area immediately outside the facility free of litter, weeds and standing water?

Auditor Answer: Major Deficiency

Approved

Auditor Comments: Major. Weeds and litter were present along the rear (south) side of the building. Litter and debris were present in the parking lot in front of the loading dock area on the north side.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Weeds and trash were picked up & cleared from behind the building (see attached pictures) and litter and debris was picked up in front of the building (see attached pictures). Outside of the building, front and back, have been added to the Master Sanitation List (see attached) to keep it neat, tidy and free from debris to prevent the attraction of pests, rodents, etc.

[File 1](#)

[File 2](#)

[File 3](#)

[File 4](#)

[File 5](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes, exterior areas, notably around the rear of the building and in front of the loading dock are now clean and free of weeds and litter.

GMP – Operation Monitoring Records

2.27.05 Are there records (with corrective actions) that show anti-microbial strength testing of hand/foot/tool dip stations? Are there stock check and replenishment records for gel and spray stations?

Auditor Answer: Major Deficiency

Approved

Auditor Comments: Major. Records of sanitizer gel dispenser stock checks and replenishment are not maintained for dispensers in the main facility. These records are maintained on a separate log for the single dispenser located in the repack room.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

The sanitizer gel dispenser checks have been added to the Pre Operation Check List (see attached) to make sure they are stocked and if not then the corrective action is done to make sure the dispenser(s) are filled and this is documented under the Corrective Action section of the Pre Operation Check List form, matching what is done in repack department which has their own Pre Operation Check List. Employees responsible for the form and corrective action have been trained (see attached documentation)

[File 1](#)

[File 2](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes, records of sanitizer gel dispenser stock checks and replenishment are maintained as part of the daily pre-operation inspections for all units throughout the facility.

GMP – Maintenance & Sanitation Files

2.28.01 Does the facility have a preventative maintenance program and a documented schedule?

Auditor Answer: Minor Deficiency

Approved

Auditor Comments: Minor. Shipping trucks are included in the preventive maintenance schedule, but are not listed in the preventive maintenance program outlined in document 2.6.1 (7 MAY 2013, Vicki Gilbert). Maintenance of forklifts and refrigeration equipment is outsourced. Floor scrubber machines are maintained in-house.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

Shipping trucks have been added to the Preventive Maintenance SOP (see attached). The shipping trucks are leased from Ryder and they handle all the preventative maintenance and have the documentation on file.

[File 1](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes, the preventive maintenance program outlined in document 2.6.1 rev 2 (05 OCT 2015, Vicki Gilbert) now indicates that maintenance of forklifts and refrigeration equipment is outsourced to Ryder, the company that own's these pieces of leased equipment. Floor scrubber machines are maintained in-house.

2.28.04 Is there a written cleaning schedule (Master Sanitation Schedule) that shows what and where is to be cleaned and how often?

Auditor Answer: Minor Deficiency

Approved

Auditor Comments: Minor, the master sanitation schedule does not include the parking lot area in front of the open dock area.

Organization Corrective Action Response:

The following Corrective Action has been performed

Organization Corrective Action Comments:

The front outside of the facility and the back outside facility has been added to the Master Sanitation Schedule to help prevent the attraction of pests, rodents, etc. Please see attached.

[File 1](#)

Decision for Corrective Action?

Accepted

New Answer after Corrective Actions Acceptance:

Total Compliance

CB Comments

Yes, the master sanitation schedule (revised 05 OCT 2015) includes all parts of the facility, including the exterior front and rear of the building.
