Truck Tank Sealing Program (TTSP)

Milk Tanker Security Measures for Ontario

Truck Tank Sealing Manual

Developed by
Dairy Farmers of Ontario (DFO)
February 2004
## CONTENTS

**THE TRUCK TANK SEALING PROGRAM**  
3

Security  
3
- General Security “Rules of Thumb”  
3
- Tanker Security  
4
- En Route Tanker Security  
4

Seals and Daily Seal Log Sheets  
5
- Broken Seals  
5

Incident Response  
6

Communications  
7

Standard Operating Procedures  
7
- SOP #1 - Standard Operating Procedure for Sealing Milk Tanker Access Points  
8
- SOP #2 - Standard Operating Procedure for Suspected Contaminated Milk  
9
- Checklist #1: Security Review  
10

Three-part Daily Seal Log Sheet  
11

Four-part Daily Seal Log Sheet  
12
THE TRUCK TANK SEALING PROGRAM

The food processing and retailing industry is increasingly demanding that their raw materials be of the highest quality and free from any contamination. In the past, the dairy industry’s reputation and verbal assertions on their level of commitment was sufficient to maintain customer trust. However, today’s buyers want and need more assurance. In addition, many processors have adapted Hazard Analysis Critical Control Points (HACCP) programs, or other similar programs, which require the sealing of all raw material trucks.

The goal of Dairy Farmers of Ontario’s (DFO) Truck Tank Sealing Program (TTSP) is to begin a process of increasing awareness of potential security risks while milk is in transit and to introduce methods to reduce the risk. No milk transporter will be able to protect the cargo against all possible risks. Reducing risk, however, can be achieved by anticipating or recognizing risks in the day-to-day operation and intervene, where possible, to decrease the risk to an acceptable level.

This program has evolved since its inception and will continue to do so as improvements in the program are implemented or new potential risks are identified.

There are three basic principles with respect to the Truck Tank Sealing Program that BTMGs must be cognizant of at all times:

• Seals must be on the vehicle whenever the truck is left unattended (out of sight) for some minutes.

• DFO has established the following standards with respect to tank sealing. However, the truck can be sealed and re-sealed as often as necessary in any given work period but all sealing and breaking of seals must be recorded in the daily seal log sheet.

• All seals that are removed from a truck during a continuous work period must remain with that truck. The removed seals will be disposed of by the BTMG at the end of the daily cycle for that truck.

Security and communications will be addressed in the balance of this document.

Security

General Security “Rules of Thumb”

• All transporter employees should be made aware, by the transport Manager/Supervisor, of the potential signs of tampering with the product or equipment, the areas that may be vulnerable to tampering, and what is an unusual situation. All transporter employees should always report any suspicious findings to their supervisor and the DFO Marketing Office.

• Always evaluate any request for information about your task/operation. Never provide information without approval from your supervisor.
• A daily seal log sheet must be available for each load.

Tanker Security

To ensure the security of milk on trucks, seals must be used on all access points to the milk and/or milk contact surfaces within the truck tank i.e., manholes, CIP connection points, and the pump/valve compartments. Dairy Farmers of Ontario will supply all milk transporters, on a continual basis, with plastic seals. Each seal will have a unique identification number, which must be recorded, as outlined below, on the daily seal log sheet. Seals should not be shared with other transporters as the seals are allocated to transporters based on the seal identification number.

En Route Tanker Security

• It is the BTMG’s responsibility to ensure that seals are attached to the manhole covers, pump/valve compartment and CIP connection points when the vehicle is left unattended and at the end of the day. A daily seal log sheet must be maintained at all times.

• The BTMG, prior to leaving for the collection route, must check to verify all seals are in place and show no evidence of tampering and, the numbers on the seals correspond to the numbers that were entered in the daily seal log sheet.

• At the start of the day if the BTMG is picking up milk, the BTMG breaks and removes the seal to the pump/valve compartment, to install the sample case, and notes this with the corresponding seal number, in the appropriate place on the daily seal log sheet.

• If, at any time, the BTMG finds that a seal has been broken without their knowledge or that a seal is missing, they must immediately notify their supervisor who will notify the local marketing office. Do not pick up or deliver any more milk until instructed by a Marketing Officer.

• Any time the tanker is not in the control of the BTMG, e.g. out of sight, gone for a meal, in the depot, etc. all access points on the tanker must be secured with a seal.

• All Pumpover loads must be sealed at all access points before the load departs from the depot.

• Once the tanker arrives at the receiving location, authorized receiving personnel will compare the numbers on all the seals to the numbers in the daily seal log sheet and sign the sheet. Both the driver and the receiver must maintain a copy of the tanker daily seal log sheet.

• Decision to seal or not:
  − Tanker is returning for reloading – not necessary to seal access points as long as the BTMG remains with the vehicle.
  − Tankers must always be in the control of the BTMG – if at any time it is not, then all access points must be resealed.
– Insuring the tanker is resealed at the end of the day is the responsibility of the BTMG.

• Drivers should expect security spot checks, by DFO, at transporter depots or processor facilities.

Seals and Daily Seal Log Sheets

The placement of seals on all access points reduces the risk of deliberate contamination of the milk during the various steps in the collection and delivery process. The goal is to have all openings on the milk tankers sealed at all times, except when the tanker is being loaded, unloaded, sampled, washed or is in the control of the driver.

• A daily seal log sheet must be kept with the unit at all times. It will record the date, driver/receiver who installed/removed the seal(s), tanker numbers, and seal numbers. Recording seal numbers will provide a chain of custody for each delivery of milk.

• On multi-trip days the BTMG will leave the bottom copy of the daily seal log sheet at the first plant, the middle copy shall be left at the second plant and the top copy will be retained by the transporter (special four-part daily seal log sheets available for triple-tripping vehicles).

• Seals will be placed at access points to milk:
  – manhole
  – pump/valve compartment
  – wash line connection

• Seals are installed:
  – whenever the tanker is finished for the day
  – when a BTMG is not in attendance or in control e.g. tanker parked overnight, driver goes for a meal, tanker in repair shop, etc.

• Seals not in use must be stored in a secure environment at the depot, in the truck or in the driver's possession.

• It is the responsibility of the BTMG to ensure all broken seals are carefully discarded in waste bins, or recycled, at the end of the daily cycle.

• The transporter must keep daily seal log sheets for a period of six months.

Broken Seals

If a seal is broken, missing, damaged or does not correspond with the seal log the following applies.

• If a seal is broken in order to complete a repair, maintenance, or inspection task (e.g. changing pump or motor, entering tank for inspection, etc.), the access points must be resealed after the task is done. The new seal number and the date/time it was installed must be recorded on the daily seal log sheet. The broken seal must be retained until the next load is delivered.
• If a seal is broken without any known cause, the transport supervisor and a DFO Marketing Officer must be notified immediately. If the tanker is:
  – empty – tanker must be re-washed (as instructed by supervisor) before the next milk pick-up and investigate as requested;
  – full or partially loaded – milk is not to be unloaded, and the tanker must be identified. Driver awaits further instructions re unloading/disposal;
  – contaminated, full or empty – wait for further instructions regarding any special disposal/washing requirements from DFO/OMAF.

• The Marketing Officer will investigate with the transporter to determine if there is a known or probable cause for a missing or cut seal. If a logical explanation is forthcoming from the investigation the processor, where the load is being delivered, will be given the option of accepting or rejecting the load based on the explanation. If the load is rejected by the plant it is disposed of. No attempt will be made to market the milk elsewhere. If there is no explanation as to why the seal is missing or cut the load will be disposed of.

**Incident Response**

If a tanker that contains milk has been identified as suspect contaminated, based on missing or broken seal(s), the following steps must be taken.

• Immediately notify the local DFO Marketing Office as well as the transport company supervisor so that an investigation can be completed as quickly as possible.

• If a suspect tanker is to be parked in a transporter depot or plant facility, identification of the suspect tanker must be clearly visible (e.g. markers, signs, etc.).

• Do not release any of the contaminated milk or milk samples until instructed by DFO.

• Keep all daily seal log sheets, and any broken seals until instructed by DFO. Always maintain a copy of the daily seal log sheet with you.

• Do not attempt to identify any hazardous material by smell or touch. Reseal the tanker (if unsealed) and note the seal numbers.

• Keep all unauthorized persons away from the tanker.

• Transfer contents from the tanker only if instructed by DFO.

• Follow all instructions on where/how to wash the tanker and re-enter into regular use.

• Do not dump the load until approval has been given. Always confirm the location of the dumping site.
Communications

- Managers, Supervisors and BTMGs should network with others to share information to determine if there is a pattern of activities that, when taken alone are not significant, but when taken as a whole generate concern.
- Communication within the depot and while drivers are in the truck should be maintained to ensure that all key personnel can be reached at all times.
- Transporters should develop an information/feedback system for BTMGs to report discrepancies, inefficiencies or improvement ideas. BTMGs should report back to their manager and DFO as soon as possible.

Standard Operating Procedures

Transporters should complete the attached Standard Operating Procedure (SOP) forms. These forms outline for transporter employees the step by step procedure that should be followed in sealing milk tanks/trailers and action to be taken with respect to suspected tampering with a tank/trailer.

Also attached is a copy of the type of checklist the Marketing Officer will use when evaluating whether transporters/BTMGs are adhering to the proper procedures.
SOP # 1 - Standard Operating Procedure for Sealing Milk Tanker Access Points

In order to ensure that milk is secure from tampering, describe step by step the actions taken to seal a tanker.

Step 1

________________________________________________________________________

________________________________________________________________________

Step 2

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Step 3

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Step 4

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Step 5

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Step 6

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SOP #2 - Standard Operating Procedure for Suspected Contaminated Milk

In order to ensure that any contaminated milk is not accidentally added to the system, describe step by step, the various steps that should be taken:

Step 1_____________________________________________________________________

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Step 2_____________________________________________________________________

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Step 3_____________________________________________________________________

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Step 4_____________________________________________________________________

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Step 5_____________________________________________________________________

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Step 6_____________________________________________________________________

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Checklist #1: Security Review

To ensure security efforts are being maintained spot checks will be performed on a regular basis.

<table>
<thead>
<tr>
<th>Practice</th>
<th>Verified</th>
<th>Problem/Corrective Action</th>
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</thead>
<tbody>
<tr>
<td>Facilities</td>
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<tr>
<td>Are seals and seal logs easily accessible to anyone other than the drivers?</td>
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<tr>
<td>Are tankers in the depot always visible/secure and if not are they sealed?</td>
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<tr>
<td>People</td>
<td></td>
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<tr>
<td>Have standard operating procedures been developed and implemented by drivers for when the tanker is not under their control i.e. stopping for meals, fuel, breakdowns, etc?</td>
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<tr>
<td>Are there SOPs in place and known by drivers when faced with suspicious circumstances?</td>
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<tr>
<td>Do employees know how to and do they feel comfortable about reporting suspicious activity to management? Is there a recall plan in place?</td>
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<tr>
<td>Trucks/Tankers</td>
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<td>Is there a SOP outlining the requirement and steps to keep tankers sealed?</td>
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<td>Is there a communication method between drivers and supervisors at any time?</td>
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<td>Incidence Response</td>
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<td>Are specific procedures outlined for investigating any food security situation that might be identified inside the plant and are the drivers aware of what to do?</td>
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<td>Is there a detailed written plan in place and available to identify who does what, where, how and when? Are crisis procedures known by someone on duty at all times?</td>
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<td>Are mock crises ever done to test specific procedures and employee awareness?</td>
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</table>
# Three-part Daily Seal Log Sheet

## DAILY SEAL LOG SHEET

<table>
<thead>
<tr>
<th>SEAL #</th>
<th>SEAL ON</th>
<th>SEAL OFF</th>
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<tbody>
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<td>DATE MTH/DAY</td>
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### COMMENTS

- Receiving Location #1
- Receiver Signature
- Receiving Location #2
- Receiver Signature

*White Copy – Transporter*
*Yellow Copies – Plants*

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rev 12/03
### Daily Seal Log Sheet

**Transporter #**

**Truck #**

**Trailer #**

1st BTMG #

BTMG Signature

2nd BTMG #

BTMG Signature

<table>
<thead>
<tr>
<th>SEAL #</th>
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**Comments**

Receiving Location #1

Receiver Signature

Receiving Location #2

Receiver Signature

Receiving Location #3

Receiver Signature

*White Copy – Transporter*

*Yellow Copies – Plants*

rev. 12/03