THE DAIRY PRACTICES COUNCIL®

GUIDELINE FOR SEALING BULK MILK TRUCK TANKS

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APPROVED COPY
EXCEPTIONS FOR INDIVIDUAL STATES NOTED IN TEXT OR FOOTNOTES
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https://www.dairypc.org
evp@dairypc.org

Guideline Preparation and Review Process

Guideline development within Dairy Practices Council (DPC) is unique and requires several levels of peer review. The first step in the process of guideline development starts with a Task Force subcommittee comprised of individuals from industry, regulatory and education interested in and knowledgeable about the subject to be addressed. Drafts, referred to as 'white copies,' are circulated until all members are satisfied with the text. The final white copy may then be distributed to the entire Task Force, DPC Executive Vice President and whoever the Task Force Director feels would add to the strength of the review. Following final white copy review and correction, the next step in the process requires a yellow cover draft that is circulated to the member Regulatory Agency representatives that are referred to as "Key Sanitarians." The Key Sanitarians may suggest changes and insert footnotes if their state standards and regulations differ from the text. After final review and editing the guideline is distributed in the distinctive DPC green cover to people worldwide. These guidelines represent the state of the knowledge at the time they are written.

Disclaimer

The DPC is not responsible for the use or application of the information provided in this Guideline. It is the responsibility of the user to ensure that the information addresses their needs and that any action taken complies with appropriate regulations and standards.

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INTRODUCTION

Security of raw milk in transit from the farm to the milk plant is a concern for the dairy industry that provides the public with safe wholesome milk products. Consumer groups are also demanding increased security on the milk supply leaving the farm in route to the plant. Since we live in a world of tamper-proof packaged goods, the direction for milk tank trucks to become tamper-proof evident is also being asked for. This will be accomplished by the industry deploying a milk tank truck security sealing guideline that can be effective for all to use and create uniformity throughout the industry.

In practice, appropriate sealing procedures will include sealing all milk tank truck openings with wire or plastic strips attached to identifying tags. Seals must be broken to be removed. Each tag will be pre-printed with identifiers. As an opening is sealed, the tag number should be recorded on a "wash tag" specific to that day's load. Each milk tank truck will be sealed immediately after washing and sanitizing. Seals will be broken by the hauler/sampler at the first stop on their route. New seals will be attached after the collection of milk at the last stop of the route. Unsealed openings should be padlocked between route stops. When the load is received, seals will be checked against the hauler/sampler's paperwork. Discrepancies shall be investigated. Seals need to be sealed tight and not left loose.

It is the intent of this guideline to provide direction in accomplishing all of these objectives. However, it is not the intent of this guideline to address the security of milk being produced and stored on the farm and in the plant after it has been received. Also, of concern, is the contract between the plant and the hauler/sampler, designating who is responsible for the sealing of the milk tank truck openings. The hauler/sampler can be directed to several different plants and, therefore, require standardization of sealing procedures to ensure that each load of milk is handled according to acceptable protocol. Hauler/samplers need to be aware that plants may have a policy that is more stringent than the procedures set out in this guideline.

DEFINITIONS

PMO– Pasteurized Milk Ordinance.

GUIDELINE CONTENT

Purpose For Milk Tank Truck Sealing

Establish a Standard throughout the Industry on Security

Many food manufacturers have already implemented procedures to safeguard ingredients they purchase in bulk and products they package for sale to the public against unauthorized entry. Having these requirements in place and functioning has become a standard operating procedure. In addition to giving greater protection to the milk supply in transit from the farm to the plant, establishing a standard for sealing of milk tank trucks will also help keep the dairy industry in pace with other food industries who already have these practices in place.

Develop Stronger Consumer Confidence

As acts and threats of terrorism increase in today's world, measures must be taken to protect our nation's food supply. The dairy industry has known this and continues to move in the direction of establishing a milk tank truck sealing protocol to help accomplish this task.

Increased Emphasis on Hauler/Sampler Safeguarding Milk from Farm to Plant

When a milk tank truck sealing protocol is in place, and farm pickup hauler/samplers are trained in their added duties of securing the milk tank truck before leaving the plant, receiving station or transfer station emphasis will be placed on procedures for the hauler/samplers securing their milk tank truck. The hauler/sampler realizes the responsibility of seeing that all openings to the milk tank truck are secured. Emphasis on milk tank truck security ensures that the raw milk that the plant receives was properly secured between the farm and the plant.

Chain of Custody

Chain of custody becomes more formal with a milk tank truck sealing program. The hauler/sampler has the responsibility to see that their milk tank truck is properly sealed and that all seals are accounted for and recorded on the "wash tag". The receiver also has the responsibility to inspect all seals when the milk tank truck arrives at the receiving bay and to ensure that these requirements have been met before any seals are removed. The chain of custody is designed as a cross-reference, verification, and/or validation of a sealing program.

Regulatory Requirements

Grade "A" Pasteurized Milk Ordinance

The PMO currently does not address the requirement that milk tank trucks that are used for farm route pickups be sealed. However, milk tank trucks are required to be properly sealed when used in plant-to- plant shipments. These seals should be numbered and used to seal all openings. Hauler/samplers and processors should consult with regulatory officials in their respective states on milk tank truck sealing requirements outside of the PMO requirements.

Contract Hauler/Processor Hauler

Transportation Yard Properly Secured

Transportation yards should be properly secured to protect the integrity of the milk tank truck. This responsibility to secure hauling equipment applies equally to contract haulers and processors. These areas should have secured perimeters, adequate lighting and should also be monitored for day and night activities. Tankers need to be investigated even if empty and tag is missing.

Developing A Chain Of Custody Procedure

The chain of custody principle demonstrates the responsibilities for each party who handle the product through the steps of receiving milk from the farm to accepting it at the plant, receiving station or transfer station. Raw milk receiving personnel working in the receiving bay,

hauler/sampler, and laboratory personnel should understand the principle of a chain of custody, how it applies to them and also the facilities they work for as it applies to milk tank truck and product security.

Milk Tank Truck Properly Sealed and Numbers Documented

Seal numbers are recorded on the back of the tank wash tag which is then attached to the milk tank truck in a protected site before the numbered seal(s) are applied to all openings in the milk tank truck, including hose compartment doors, and transfer hose storage tubes. This may be done either by the receiver or by the hauler/sampler but must be done immediately after cleaning/sanitizing. Clean milk tank trucks should not sit unsealed and unattended for any length of time. The hauler/sampler must verify and validate the milk tank truck was sealed and that the seal numbers are accurately recorded on the back of the milk tank truck wash tag, or other appropriate document, before they take possession of it for the next pickup. Considerations should be made by milk tank truck manufacturers to minimize the number of seals needed to properly secure the milk tank truck for everyday use. "Tabs" at seal sites should be made of stainless steel and the welds ground and polished. These sites should also be user friendly and easy to see. Milk tank truck seals should be made so they have to be broken when removed. Since milk tank trucks vary in construction, the number of seals needed to properly secure all milk tank truck openings will also vary. Hauler/samplers and receiver personnel should know all seal sites for each milk tank truck they use. All seals should be drawn tight, so no loose loops exist. A loose-looped seal can create the potential for the seal to be broken and resealed without evidence that it had been removed. Also, plants should consider a color-coded system for identifying seals used on farm routes and inter-plant shipments. Even if color-coded seals are used, they should still be numbered.

Milk Tank Trucks en Route to Farm(s)/Plant, Receiving Station or Transfer Station

Before the milk tank truck leaves the receiving bay, it should have been washed, sanitized, tagged, properly sealed and the seal numbers recorded on the back of the milk tank truck wash tag and/or on the bill of lading. Again, it is the responsibility of the hauler/sampler to verify and validate this before leaving the facility. When the milk tank truck arrives at its first farm pickup, only those seals needed to allow access to the cabinet should be removed. These broken seals must be accounted for when the hauler/sampler arrives back at the receiving bay and, therefore, must be saved. When the farm pickup is completed, the openings that were previously sealed can be padlocked and reopened at the next farm pickup. This practice should continue until the last farm pickup is completed at which time new numbered seals must be attached to the openings that were padlocked. The removed seal numbers on the back of the wash tag should be crossed off and the new seal numbers recorded. Care should be taken by the hauler/sampler to remove only those seals actually required. If additional seals are removed, an accounting of those broken seals will need to be made at the receiving bay. Failure to provide adequate information and proper care of the assigned numbered seals could result in the milk tank truck being rejected. This could create liability to the owner, hauler/sampler, and processing facility.

Milk Tank Truck and Product at Receiving Bay

After the hauler/sampler has attached new numbered seals to the openings following the last farm pickup, documentation should be made on the back of the wash tag of the broken seals, and or, on the bill of lading. Recording all broken seal numbers used on a route on the back of

the wash tag is the most effective approach for the hauler/sampler and for the receiving personnel to use. When recording the replacement seal numbers on the back of the wash tag, the broken seal numbers should be crossed out to avoid confusion as to what seals were broken. This helps the receiving personnel and hauler/samplers in accounting for the seals removed and replaced during the route. However, all seals need to be accounted for even if they are not removed during the farm route.

Some hauling companies use a preprinted logbook with seals numbered and identified separately. This approach creates more work and responsibility for the hauler/sampler because he has to make sure all numbered seals are recorded next to each identified seal in the log book, and when a seal is broken, the log has to show which seal was removed and its replacement. Listed below is an example of a typical seal logbook format.

Standard protocol for the raw milk receiving personnel when the milk tank truck arrives at the plant, receiving station or transfer station shall be to conduct an inspection to assure that all seals are in place. Seals currently on the milk tank truck must be inspected and checked against the records before they are broken. An inspection and accounting is also conducted at this time by the hauler/sampler of broken seals returned back to the receiving bay. Broken seals and seal documents should be stored at a minimum of 15 days before being discarded. Issues with damaged or missing seals should be immediately referred to management. Unloading of the milk tank truck shall not occur until management approval has been granted.

Chain of Custody of Seals and Records

The chain of custody of seals used for each load or route should be accounted for by not only the hauler/sampler who delivered the milk to the plant, receiving station, or transfer station, but also by the receiver. This also applies to the transferring of the manifest or bill of lading for the route or load, respectively as well as the seals that were removed during the farm pickup and the seals removed in the receiving bay.

Contractual Agreements

Procedure for When a Seal Problem has Occurred

Care shall always be exercised when applying, recording, and accounting for all security seals used on milk tank trucks. Contract haulers and process haulers must ensure that their drivers will follow the protocol established by the receiving plant or facility and the policy established by the contract hauler for the loads they transport to these facilities.

Loads received with broken seals, missing seals, improperly recorded seals, or those that are suspect for any other reason should be held and the supervisor shall be immediately notified. These procedures should be followed:

1. The driver shall be interviewed by plant management using the attached form, **"Milk Tank Truck Seal Problem Survey."**

2. If there is reasonable belief that the "Chain of Custody" has been broken, the load shall be rejected.

A Milk Tank Seal Problem Survey form should be provided and used for incidents that involve missing or broken seals. When developing this form, it is recommended that legal obligations

of individuals involved be addressed. Listed on the following page is an example of a Milk Tank Truck Seal Problem Survey Form.

REFERENCES

- None.

APPENDIX

Log Format Date/Time		Example Format Date/Time (same as wash tag)	
Seal	Log	Seal	Log
Seal #1		Seal #1	1230
Seal #2		Seal #2	1231
Seal #3		Seal #3	1232
Seal #4		Seal #4	1233
Seal #5		Seal #5	1234
Seal #6		Seal #6	1235
Seal #7		Seal #7	1236
Seal #8		Seal #8	1237
Seal #9		Seal #9	1238
Seal #10		Seal #10	1239
Seal #Broken	(Date/Time)	Seal #Broken_1	5/04/04,0700
Replaced with		Replaced with_1240	5/04/04,1145
Seal #Broken		Seal #Broken_3	5/04/04,0700
Replaced with		Replaced with_1241	5/04/04,1145
Seal #Broken		Seal #Broken	
Replaced with		Replaced with	
Seal #Broken		Seal #Broken	
Replaced with		Replaced with	

MILK TANK TRUCK SEAL PROBLEM SURVEY

Incident Date _____ Time _____ Location _____

Interviewed by _____ Title _____

Employed by _____

HAULING COMPANY/HAULER INFORMATION

Company's Name _____ Tank# _____

Driver's Name (responsible for tank with problem) _____

Address _____

Telephone # _____

Plant problem occurred at _____

TYPE OF PROBLEM

Equipment seal provision problem _____ Location _____

Missing seal _____ Location _____

No seal numbers recorded on seal document _____

Seal numbers do not match _____ Location _____

Other _____

*Even if the tank is empty and seal is broke, before milk is used in it should be rejected.

DRIVER INTERVIEW - what about unlicensed haulers?

Please explain the seal problem _____

Was the milk tank truck secure at all times since it was washed/sanitized?
Please explain _____

_____

Did you pick up all of the milk on this truck? _____

Did you notice a broken or missing seal? _____

Time noticed _____

If not, who did? _____

If you are the transport driver, did you inspect the seals when you took control of the load?

Was the truck out of your immediate supervision at any time? _____

Did you notice any unusual or suspicious activities? _____

If so, explain _____

At which location was the tank last unloaded or washed/sanitized? _____

Does the milk tank truck have a wash tag? _____ Date _____ Time _____

Plant _____

Driver's Name _____

Sampling License # _____

State _____

Expiration Date _____

Driver Signature _____

Date _____

CURRENT ACKNOWLEDGEMENTS

**This guideline was developed by contributors who are of experienced individuals in a related field(s). The acknowledged persons are included with their professional affiliations and may be contacted via a DPC Officer(s) and/or Task Force Director(s) for questions or concerns.*

Officers

Name	Position
Chris Hylkema	President
Keith Hay	Vice President
Mary Wilcox	Executive Vice President

Task Force Director

Jessica Smith, Laboratory and Quality Control Procedures Task Force

Lead Author(s)

Carli Peskar, USDA-FMMA

Contributor(s)

- George Mikolaj *(USDA-FMMA)*
- Jessica Smith *(USDA-FMMA)*

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- Patrick Boyle *(Readington Farms, Inc.)*
- Les Wood *(California Department of Food and Agriculture, Milk and Dairy Foods Safety Branch)*
- John Johnston *(Ontario Milk Transport Association)*
- Neil Bendixen *(Dairy Marketing Services, LLC)*
- Myron Bozel *(Purdue University)*
- Mike Damon *(Parmalat USA)*
- Michelle Fenton *(USDA-FMMA)*
- Grant Gayman *(MD & VA Milk Producers Cooperative)*
- Robert Gilchrist *(Agri-Mark, Inc.)*
- Keith Hay *(Pennsylvania Milk Marketing Board)*
- Mike Kidd *(MD & VA Milk Producers Cooperative)*
- Gaylord Smith *(Mohawk Associates, Inc.)*
- Chris Thompson
- Rick Wadham
- George Wilcox

(Division of Regulatory Services)	*(Earl T. Wadhams, Inc.)*	*(Agri-Mark, Inc.)*
• Bebe Zabilansky *(Bruns Bros. Process Equipment)*		