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January 1, 2013

TO WHOM IT MAY CONCERN:

Please be advised that Innophos has adopted a new General Format for Lot Code Identification on Innophos' Product and it is as follows:

Lot XXXXXX XXX, where XXXXXX is a sequential six digit lot number, and XXX is the sequential three digit pallet number within the lot. This identification appears on individual pallet labels

The Certificate of Analysis which accompanies each lot in the shipment contains the manufacturing date and the retest (shelf life) date. The lot number on COA's is six digits XXXXXX, followed by a pallet range of 6 digits XXXXXX: the first 3 digits are the first pallet in the lot and the next 3 digits are the last pallet in the lot.

Please advise if you have any questions or need further information regarding this matter.

Regards,

A handwritten signature in blue ink, appearing to read "Roy Lyon".

Roy Lyon
Quality/Regulatory Assurance Manager

Approved

INNOPHOS- NASHVILLE PLANT

Revision: 2

NAS 1 Procedure

Effective Date: Apr 18, 2011

Review Date : Apr 18, 2013

Food Safety Manual

Document #: FOOD SAFETY MANUAL

Food Safety Manual



Innophos, Inc.
Nashville Plant
4600 Centennial Blvd.
Nashville, TN 37209

Approved

INNOFOS- NASHVILLE PLANT

Revision: 2	NAS 1 Procedure	Effective Date: Apr 18, 2011
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This handbook contains general Food Safety Policies. All employees must know and follow these rules and policies. There are specific departmental rules and job procedures in other plant documents that must be followed where applicable.

The rules, statements and contents of this booklet are not intended to cover all possible situations and conditions. Changes may be required and will be made as needed and warranted. The company may establish additional rules as deemed necessary.

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Revision: 2	NAS 1 Procedure	Effective Date: Apr 18, 2011
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I. GENERAL GUIDELINES

1. The Nashville Plant manufactures phosphoric acid based products that are used in food applications. Therefore, the Nashville plant and all employees must adhere to the current Good Manufacturing Practices (GMP's) as established by the Food and Drug Administration (FDA) in CFR 21 – Part 110.
2. Appropriate Quality Control operations shall be employed to ensure that products (and all packaging materials) are free from contamination and suitable for human consumption.
3. All equipment shall be designed, installed, operated and maintained in such condition so as to minimize product spills or leaks, to prevent product contamination, to facilitate sanitation and cleaning, and to eliminate any possible breeding places or harborage for insects, rodents, or birds.
4. All operations in the receiving, inspecting, transporting, packaging, processing, storage and shipment of product shall be done following Good Manufacturing Practices.
5. The requirements stated in this handbook are minimum standards for the plant. In the event that a plant or departmental rule is more stringent - it shall take precedence.

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II. PEST CONTROL PRINCIPLES

1. Pests including (but not limited to) birds, rodents, and insects shall not be allowed in any area of a food plant.
2. The following preventive steps shall be followed to exclude pests from the buildings :
 - a. Build them out - This includes providing protection over any opening in the exterior of a structure through which rodents, birds, or insects are likely to enter. This also includes keeping all doors and windows shut or properly screened.
 - b. Eliminate harborage areas - This includes eliminating cracks, crevices, holes or any other areas where pests may seek shelter.
 - c. Eliminate the food supply - Areas are to be kept clean and free of any spillage, dust, water, refuse or any other material on which pests might feed.
 - d. Utilize proper pest control practices - rodent traps, pesticides, and other pest control measures shall be used to eliminate any pests that may have gotten into the structures. Bait stations shall be used in outside areas only - primarily around #1 Warehouse, food phosphate process buildings, acid plant, and along perimeter fence lines.
 - e. Ground areas in the vicinity of food grade areas, storage and loading facilities shall be kept free of weeds, grass, and standing water.
3. Only approved pesticides and herbicides are to be used in the plant. Pesticides must be used only according to the instructions on the label and they must be applied by a Certified Pest Control Technician. Amounts of pesticides used, where used, and how often, are to be recorded and maintained on the Pesticide Usage Log located at the guard station and are to be readily available for inspection by internal and external audit functions. MSDS sheets and product labels will be available for any pesticide or herbicide used in the plant.
4. Weed control - Since weeds and foliage tend to attract and provide harborage for pests, it is necessary to control weeds by spraying with approved chemicals. Initial spraying will be done in the spring with follow up inspections and re-treatment if necessary.
5. All employees are responsible for the observance and notification of infestation problems in the plant. A pest control log book is located at the security desk in the front lobby into which entries may be made specifying problem, location, and date. The pest control technician makes weekly inspections and part of their duties is to check the log book and take corrective action for any pest problem reported.

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III. PERSONNEL PRACTICES

All employees and supervisors working in the plant shall be trained in proper food handling techniques and food safety principles. All employees are responsible for recognizing potential product contamination sources; and, for correcting or initiating corrective actions as soon as possible. Employees, who are likely to contact food grade chemicals, food packaging materials or food processing equipment shall observe the following rules:

1. Employees, visitors, and contractors must be free of boils, sores or wounds or any other infectious or communicable disease. Employees shall notify their supervisor of such condition. Visitors and contractors will be advised of this requirement and shall report such condition to their plant contact. Each case will be reviewed and appropriate action taken to ensure disease is not transmitted.
2. All cuts and grazes on exposed skin shall be covered by a detectable blue metal strip bandage that is company issued. These can be obtained from the First Aid Station located in the QC Lab.
3. A sample from each batch of metal strip bandages shall be successfully tested through a metal detector and records shall be kept by the QC Lab.
4. Wear clean outer garments, free of loose fibers. Employees shall maintain good personal hygiene standards. Gloves, if worn, should be maintained in an intact, clean and sanitary condition to avoid product contamination. Uniforms shall be visually checked for cleanliness and defects by the employee. If the uniform is not suitable for use, the garment will have a repair tag applied and given to the service representative. Uniforms should not be worn home.
5. Wash hands thoroughly in an adequate hand wash facility before starting work, after each absence from the workstation, after going to the toilet, eating, smoking, or blowing noses and any other time that the hands may have been soiled or contaminated.
6. Remove any exposed or unsecured jewelry or other items that might fall into processing equipment, product or product packaging materials, including watches, rings, necklaces, bracelets or dangling jewelry. This will be for all areas of the plant except the administration building.
7. Fingernails shall be kept short, clean and unvarnished. False fingernails shall not be permitted. Where visitor's cannot comply, suitable control measures shall be in place, e.g. use of gloves.
8. Excessive perfume or aftershave shall not be worn.
9. Items such as pens, pencils, etc. shall be carried in pockets or pouches below the waist when employees are working in production areas.
10. Storing food, drink, gum, tobacco, or personal clothing in the immediate work area, which includes areas outside the control room, lockers and jobboxes, is not acceptable. Refrigerators that are to be used for food storage must be clearly marked "FOR FOOD ONLY". Chemicals and food products are not to be stored in the same refrigerators.
11. No eating, drinking, chewing gum, or use of tobacco products is allowed in any areas where food grade products, packaging materials, or processing equipment are present. Open food or drink containers are not allowed in the plant. Food can be transferred to control rooms or designated lunchrooms in closed sacks, lunch boxes or closed styrofoam containers.

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Personal Medicines

Medicines, such as aspirin, Tylenol, etc., are distributed and accounted for by the First Aid Room in the QC Lab. Where persons have specific conditions that may require urgent taking of medicine, the medication can be transferred to and stored in control rooms or designated break rooms in closed sacks, or lunch boxes.

Designated Smoking/Tobacco use Areas

Smoking/Tobacco use is permitted in designated smoking areas only. Smoking outside these designated areas will be considered a violation of the Nashville Plant's Food Safety Rules. Adequate smoke break time will be given for meetings that last more than one hour. Cigarette butts must be discarded into approved containers and not thrown onto floors or yard grounds.

- Catalyst, P2O5, SALP/Shipping and the Acid Plant all have established smoking areas outside the process buildings, which are marked with signs.
- A shelter is located in the following areas: Southeast corner of the old machine shop; Southeast wall of the No. 2 warehouse; North wall of the administration building.
- A shelter is located at the contractor's area on the Kaiser property.

Hair Nets and Facial Hair

Based on risk assessment, hair nets are not required in production and packaging areas by employees, contractors or visitors unless they have long hair that would extend past the neck collar area. If a hair net is not worn, hair must be placed within the protection of the hard hat. Hair nets will be worn by anyone entering the process equipment (ex. dryer, hydrator, dust collector).

Facial Hair must be kept to a minimum. Full beards are forbidden. If an outside contractor has a beard, he will not be allowed to work inside process equipment in a Food Grade Area unless he wears a snood to cover the beard.

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IV. SANITARY GUIDELINES

1. Water that contacts food grade product surfaces shall be microbiologically safe.
2. An adequate supply of running water at suitable temperatures and pressure shall be provided in all areas.
3. Adequate toilet and hand washing facilities shall be provided for employees.
 - a. Bathrooms shall be kept clean, in good repair, supplied with toilet tissue.
 - b. Signs shall be posted in bathrooms directing employees to wash hands before returning to work.
4. An adequate sewage disposal system shall be provided.
5. Potable and non-potable water systems shall not be joined unless adequate safeguards are provided to prevent the mixing of the two streams.
6. Refuse receptacles shall be maintained in a manner to protect against leakage and contamination. Refuse containers should be emptied when full or on a daily basis, which ever comes first.

V. QUALITY CONTROL GUIDELINES

A. TESTING

1. All Quality Assurance testing shall be in compliance with FDA requirements.
2. Quality Assurance Laboratory findings of product contamination should be immediately investigated and corrective action taken by the appropriate area supervision. Customer complaints regarding product contamination also should be immediately investigated and corrective action taken as soon as possible.

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VI. PRODUCTION GUIDELINES

A. RECEIVING INBOUND MATERIALS

1. Raw materials should be sampled and tested as required. Supplier certificates of analysis should be reviewed prior to use.
2. Raw materials shall be stored in conditions that will prevent deterioration and protect against rodent, bird, insecticide, odor or other contaminants.
3. Rail cars and trucks delivering raw materials and packaging materials shall be inspected by unloading personnel at the receiving point to assure that the material received has not been contaminated in any manner. The material being received shall be examined for signs of contamination or damage.
4. Material scheduled for rework shall be labeled as rework and segregated from finish product.

B. PROCESSING GUIDELINES

1. All food grade product surfaces and utensils shall be cleaned as often as necessary to prevent contamination. Utensils shall be stored off the floor.
2. Separate and distinct cleaning utensils shall be utilized for cleaning. Proper identification by identification and segregation shall be maintained.
 - a) Green Bristle Floor Brush w/fiberglass handle- used for cleaning floor surfaces.
 - b) Orange Bristle Counter Brush- used for cleaning equipment and counter tops.
3. A written procedure should be maintained in each food production area to:

Clean equipment as frequently as necessary to prevent contamination of the product and to minimize the accumulation of dust, dirt, and other debris on equipment or building structures
4. Product, ingredients, and packaging that have become contaminated shall be rejected and properly disposed of.
5. All chemicals, including cleaning and maintenance compounds, shall be segregated from all food ingredients and packaging supplies. Only lubricating materials suitable for use in food processing areas should be used and containers should be properly labeled and stored.
6. Meaningful codes shall be applied to products sold or distributed from a manufacturing, processing, or repacking operation. Such codes shall enable positive lot identification. Legible records shall be maintained by each facility or production area.
7. Equipment is to be enclosed during product processing so as to protect the product from all possible outside contamination.
8. Packaging operations shall be performed in such a way as to protect the product against contamination.

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METAL CONTROL POLICY

The use of cutting blades on equipment and needles, as well as utility knives with snap-off blades are not used in the plant. Standard utility knives are used to cut bags to reprocess product or cut the stretch wrapping as needed, etc. The knives are inspected for breakage. Wires supplied with the safety permits are used to hang the work permits at the job site. When the permit is removed, the wire is removed as well.

GLASS POLICY

The presence of glass in the plant is to be minimized. Employees are not allowed to bring glass containers into the plant. Any glass that is present (i.e. light bulbs) must be shielded so as to prevent entry into any process equipment, product stream or into packaging materials. Broken or missing window panes should be temporarily covered until permanently replaced. An audit of glass, brittle and hard plastic, ceramics and similar materials are being performed quarterly. Broken glass shall be cleaned up immediately and disposed of properly in an outside receptacle. If product contamination is suspected, product should be isolated and area supervisor notified. **The Production Supervisor or his designee will authorize to continue production. Personnel are responsible for checking footwear for broken glass after breakage to prevent any further contamination. Incidents of glass breakage will be reported in EtQ incident database or on HK Inspections.**

C. GENERAL MAINTENANCE

1. All outside doors should be kept closed or screened when not in use to help prevent pests from entering a building. Any crack or opening larger than 0.25" around a door should be eliminated.
2. Holes, cracks, and crevices in walls, floors, and ceilings should be patched with a smooth cleanable finish where necessary to eliminate rodent and insect harborage areas.
3. Holes and openings around pipes and equipment that passes through outside walls should be sealed shut to prevent pests (rodents, insects, birds) from entering the building.
4. Mechanics should keep the process area in which they are working cleared of debris, broken parts, nuts, bolts, oil, grease, etc. on a daily basis. Mechanics should leave the process area clean and free of maintenance items when the job is complete.
5. Process leaks in piping, ducts, and equipment should not be allowed to continue beyond the normal time required to make permanent repairs.
6. Ceilings, walls, and floors should be designed so as to be easily cleaned and maintained.
7. Peeling paint, splintering concrete and process material build up should be removed from equipment, walls, and ceilings to prevent possible product contamination.
8. Electrical boxes should be kept closed and sealed tight to eliminate insect harborage.

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VII. PRODUCT PACKAGING AND BULK LOADING

1. Packaging materials shall be kept clean so as to not transmit contaminants or other objectionable substances to the products.
2. Packaging and bulk loading equipment shall be designed and maintained to adequately protect the product against possible contamination during the packaging or bulk loading process. This includes but is not limited to contaminants such as dust, dirt, peeling paint, water and any other items that could get into the product container or the product.
3. Lot numbers shall be legibly printed on all finished product containers and records should be maintained as to where each product lot is stored and shipped so that the product can be retrieved or recalled if ever necessary.
4. All trucks and rail cars and associated loading or unloading equipment used to transport finished food grade products shall be visually inspected and found to be clean & suitable prior to loading.
5. Spillage shall be cleaned up around all loading and unloading areas as soon as possible after each occurrence and definitely during the same shift that they occur.
6. Any product spillage on the top of rail cars or trucks should be cleaned off prior to shipment.

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VIII. WAREHOUSE AND STORAGE GUIDELINES

1. Warehouse and process area doors and windows should be kept closed or screened to help prevent pests from entering the building.
2. Leaking product from damaged product containers shall be cleaned up immediately. The leaking container shall be patched immediately to avoid additional spillage. Leaking containers should be removed from the warehouse and disposed of or reworked as soon as possible.
3. Where possible, product and supplies must be stored at least 18" from the wall or nearest obstruction to allow access for cleaning, inspection and pest control.
4. Receiving/shipping areas should be cleaned up daily and free of any damaged or irregular pallets and other waste products.
5. Incoming supplies/products shall be inspected to avoid accepting items already damaged or contaminated.
6. Oldest products/supplies should be shipped/used first (FIFO), unless customer specifications dictate otherwise.
7. Mixing different products on the same pallet or same stack should be avoided.
8. Damaged or dirty pallets shall not be used for handling food grade products or supplies.
9. Floors, walls, overheads, ledges, and stored materials should be cleaned as necessary to minimize the accumulation of dust, dirt, or other debris.

IX. TRASH AND WASTE HANDLING

1. Trash containers should be placed at locations throughout the plant (both inside and outside) where needed for employees to deposit trash and other waste materials. All trash containers should be properly identified.
2. Trash containers shall be kept in good repair with no holes which would allow product to spill out.
3. Trash containers should be replaced as often as necessary to minimize the development of odors and the build up of waste inside them.
4. Trash containers should be emptied when full or on a daily basis, whichever comes first.

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X. PLANT GROUNDS

1. Ground areas in the vicinity of food grade areas, storage and loading facilities shall be kept free of weeds, grass, and standing water.
2. Plant boundaries lines shall be monitored routinely and appropriate steps taken to exclude pests, and other accumulations that might be a source of product contamination.
3. All approaches to food grade area entrances should be hard surfaced and kept clean to minimize dirt and airborne contaminants.
4. Small equipment, supplies, and miscellaneous items should be stored on shelves, racks, or pallets in good repair.
5. The floor under storage areas should be relatively flat surfaced to provide for proper cleaning of the area.
6. Systems for waste treatment or disposal shall be operated in a manner such that they do not constitute a source of contamination for any food products.

XI. BUILDING AND EQUIPMENT DESIGN AND CONSTRUCTION

1. A clear space adequate for cleaning, inspection and pest control shall be maintained around all equipment including incoming and outgoing product lines and utilities whenever facilities are changed or added.
2. Floors, walls, and ceilings of food grade production, storage and loading facilities should be constructed of smooth, cleanable, crevice free materials.
3. Equipment shall be designed and installed to be adequately cleaned.
4. Lights, fixtures, skylights, or other glass suspended over areas where food products might be exposed are to be of the safety type, a plastic substitute or otherwise protected so as to prevent product contamination in case of breakage.
5. Ventilation equipment shall be designed and installed as necessary to prevent contamination of food grade products with odors, vapors (including steam), and other airborne contaminants.
6. Proper ventilation should also be provided in all necessary areas so as to eliminate the need to open doors and windows in food grade areas.

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Innophos, Inc.

HACCP Plan

Phosphoric Acid, Food Grade

- I. Product description, Ingredient Hazard Analysis, Process Hazard Analysis
- II. Master Plan
- III. Corrective & Preventative Action
- IV. Flow Diagram

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I. Product description, Ingredient hazard analysis, Process hazard analysis

HACCP FINISHED PRODUCT PROFILE

Product Description: Phosphoric Acid, 35%-85% (Food Grade)
Method of Storage and Distribution: Storage Tank - distributed in 15 gallon & 55 gallon Polyethylene drums, 275 gallon totes, railcars and bulk trucks.
Intended Use and Consumer: Acidulation of soft drinks, Manufacture of processed cheese, fats, shortenings, Nutrient in production yeast, Manufacture of phosphate salts, Drinking water, pH control in manufacture of imitation jellies.

Composition	<u>Phosphoric Acid, water</u>
Origin of Ingredients	<u>Refer to Approved Supplier List</u>
Treatment and Processing	<u>Dilution with water</u>
Preservative tolerance/DAL	<u>0</u>
Water activity (a _w)	<u>0</u>
pH/Titratable acidity	<u>1</u>
Storage requirements (temperature/humidity)	<u>Storage tanks, stored in tight containers at above product freezing points</u>
Shelf-life/Manufacture code	<u>5 years from date of manufacture</u>
Potential for customer misuse	<u>Product is Corrosive</u>

Can this product cause food borne illness or injury? Corrosive, cause tissue destruction, permanent damage to the cornea, blindness. Causes irritation and burns to skin. Mist may Cause lung irritation, shortness of breath. Can cause nausea, vomiting, diarrhea, abdominal Pain, chest pain, shortness of breath, seizures, death.

Comment: (Explain any product or ingredient parameter essential to preventing, controlling, or eliminating food hazards) _____

Handle using current GMP rules.

Signature of Company Official: _____ Title: _____ Date: _____

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INGREDIENT HAZARD ANALYSIS

Product or Process Name: Phosphoric Acid, Food Grade

List all ingredients used in the product, process, or plant	Identify known hazards	Likely Risk (likelihood & severity) H = High, M = Medium, L = Low		Is this a Critical Ingredient (1) (Yes/No)	Identify Prerequisite Programs or process steps to reduce or eliminate known hazards
		Likelihood	Severity		
Phosphoric Acid Railcars	B No	--	--	--	--
	C Yes	L	M	Yes	Raw Material Receiving Process
	P Yes	L	M	Yes	Raw Material Receiving Process, strainer
RO Water	B Yes	H	L	Yes	Finished product does not support microbial growth
	C Yes	L	L	--	--
	P No	--	--	--	--
City Water	B Yes	L	L	--	--
	C Yes	L	L	--	--
	P Yes	L	L	--	--
Compressed Air	B Yes	H	L	Yes	Finished product does not support microbial growth
	C No	--	--	--	--
	P Yes	L	L	--	--
Atmospheric Air	B Yes	L	L	--	--
	C No	--	--	--	--
	P Yes	L	L	--	--

B = Biological, C = Chemical, P = Physical

Instructions: Identify any likely potential hazards associated with incoming material (ingredients or packaging material), rework, and preservatives, then assess to the best of your knowledge the likely risk associated with these materials and identify any specific preventive programs or corrective steps that eliminate or reduce to an acceptable level those risks in the finished product.

(1) Critical Ingredient: Any ingredient, packaging material, rework, or preservative that has a High (H) and/or Medium (M) likelihood or severity risk factor. Any item identified as "Critical" must be brought forward to Receiving on the Process Hazard Analysis Form.

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INGREDIENT HAZARD ANALYSIS

Product or Process Name: Phosphoric Acid, Food Grade

List all ingredients used in the product, process, or plant	Identify known hazards	Likely Risk (likelihood & severity) H = High, M = Medium, L = Low		Is this a Critical Ingredient (1) (Yes/No)	Identify Prerequisite Programs or process steps to reduce or eliminate known hazards
		Likelihood	Severity		
Drums	B No	--	--	--	--
	C Yes	L	M	Yes	Raw Material receiving process
	P Yes	L	M	Yes	Raw Material receiving process
Bulk Truck	B Yes	L	M	Yes	Truck inspection procedure
	C Yes	L	M	Yes	Truck inspection procedure
	P Yes	L	M	Yes	Truck inspection procedure
Wood Pallets (Heat Treated by Supplier)	B Yes	L	M	--	Raw Material receiving process
	C No	--	--	--	--
	P Yes	L	L	--	Raw Material receiving process
Totes	B No	--	--	--	--
	C Yes	L	M	Yes	FDA Guarantee Letter
	P Yes	L	M	Yes	FDA Guarantee Letter

B = Biological, C = Chemical, P = Physical

Instructions: Identify any likely potential hazards associated with incoming material (ingredients or packaging material), rework, and preservatives, then assess to the best of your knowledge the likely risk associated with these materials and identify any specific preventive programs or corrective steps that eliminate or reduce to an acceptable level those risks in the finished product.

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PROCESS HAZARD ANALYSIS

(1)	(2)	(3)	(4)	(5)	(6)
List each process step from the Process Flow Diagram. (For Receiving only, bring forward each ingredient from the Ingredient Hazard Analysis that was determined to be a Critical Ingredient.)	Does this ingredient or process step INTRODUCE a potential food safety hazard. Identify here. (Be as specific as possible when listing the hazard.)	Is this hazard CONTROLLED by a Prerequisite Program or process step? If YES , identify the Program or process. If a Prerequisite Program or process is identified, do not complete Columns 4-6 and go to next process step. If NO , go to Column 4.	Is this hazard ELIMINATED by a subsequent (later) process step? If YES , this step is NOT a CCP. Identify the subsequent process step in Column 5 and proceed to the next process step. If the hazard is eliminated at this step (no subsequent elimination step) enter NO and go to Column 6 and assign a CCP number.	Identify the last process step that will eliminate the potential hazard. (Example: metal detector, filter, cooking, pasteurizing, etc.).	Assign a CCP number when the answer in Column 4 is NO . Otherwise leave blank.
Phosphoric Acid Railcars	B No	-- --	--	--	
	C Yes	Yes, COA, QA Testing	--	--	
	P Yes	Yes, COA, QA Testing /Dispositioning	--	--	
Storage Tanks	B No	---	---	---	---
	C No	---	---	---	---
	P Yes, foreign contamination	Yes, GMP procedures, QA Testing	---	---	---
Filtration (Cartridge)	B No	---	---	---	---
	C No	--	---	---	---
	P Yes, foreign contamination	No	No	Filter Changes	CCP #1
Bulk Truck	B Yes	Yes, phosphoric acid does not support microbial growth	---	---	---
	C Yes, previous contents	Yes, preloading sample, QA Testing	---	---	---
	P Yes, foreign contamination	Yes, wash ticket, preloading inspection	--	--	--

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PROCESS HAZARD ANALYSIS

(1)	(2)	(3)	(4)	(5)	(6)
List each process step from the Process Flow Diagram. (For Receiving only, bring forward each ingredient from the Ingredient Hazard Analysis that was determined to be a Critical Ingredient.)	Does this ingredient or process step INTRODUCE a potential food safety hazard. Identify here. (Be as specific as possible when listing the hazard.)	Is this hazard CONTROLLED by a Prerequisite Program or process step? If YES , identify the Program or process. If a Prerequisite Program or process is identified, do not complete Columns 4-6 and go to next process step. If NO , go to Column 4.	Is this hazard ELIMINATED by a subsequent (later) process step? If YES , this step is NOT a CCP. Identify the subsequent process step in Column 5 and proceed to the next process step. If the hazard is eliminated at this step (no subsequent elimination step) enter NO and go to Column 6 and assign a CCP number.	Identify the last process step that will eliminate the potential hazard. (Example: metal detector, filter, cooking, pasteurizing, etc.).	Assign a CCP number when the answer in Column 4 is NO . Otherwise leave blank.
Check & Blow	B No	---	---	---	---
	C Yes, As	Yes, QA Testing	---	---	---
	P Yes, foreign contamination	Yes, GMP procedures, QA Testing	---	---	---
Bag Filter	B No	---	---	---	---
	C No	--	---	---	---
	P Yes, foreign contamination	No	No	Filter Changes	CCP #2
Totes/Drums	B Yes	Yes, phosphoric acid does not support microbial growth	---	---	---
	C Yes	Yes, pre-drumming sample, QA Testing	---	---	---
	P Yes, foreign contamination	Yes, FDA guarantee letter, seals	--	--	--

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**II. Master Plan
HACCP MASTER PLAN**

(1)	(2)	(3)	(4) Monitoring				(8)	(9)	(10)
CCP	Significant Hazard	Critical Limits	What	How	Frequency	Who	Corrective Action(s)	Verification	Records
CCP#1	Foreign Contamination	Cartridge Filter	Foreign Matter	Spreadsheet	Every 9 months	Acid Treater	Resample/Reject Truck	Visual inspection per procedure NAS_534000	Spreadsheet
CCP#2	Foreign Contamination	Bag Filter	Foreign Matter	Spreadsheet	Every 3 months	Acid Treater	Resample/Reject	Visual inspection per procedure NAS_534000	Spreadsheet

Signature of Company Official: _____ Title: _____ Date: _____

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III. Corrective & Preventative Action

A CAI must be completed anytime there is a failure at a CCP.

The procedure for filing a Corrective /Preventative action is located in the Plant Quality Procedures Manual, document number 690100-691400.

The form can be obtained from the EtQ Database.

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IV. INSERT ACID PLANT FLOW DIAGRAM FROM PROCEDURES MANUAL