



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Office of Field  
Operations

Denver District Office  
Denver Federal Center  
Bldg 45  
P.O. Box 25387  
Denver, CO 80225-0387  
Telephone: (303) 236-9800  
Fax: (303) 236-9794

March 13, 2012

Valley Meat Co., Est. 07299  
3845 Cedarvale  
Roswell, New Mexico 88203

### Memorandum of Interview

On Tuesday, March 13, 2012, at approximately 0925 hours Frontline Supervisor (FLS) [REDACTED] and Supervisory Public Health Veterinarian (SPHV) [REDACTED] conducted a meeting with Mr. Rick De Los Santos, Owner, Mr. [REDACTED], Mr. Eddie De Los Santos, Slaughter Q.C., and [REDACTED]. The meeting was to discuss items that were noted during the walkthrough that the establishment did not comply with for equine slaughter.

The following items were discussed with Mr. Rick De Los Santos, Owner, Mr. [REDACTED], Mr. Eddie De Los Santos, Slaughter Q.C., and Mr. [REDACTED].

#### SSOP – Introduction Page:

- The written program identifies cull dairy cows.
- The written program uses the names of record forms without identifying what documents are being referred to via the abbreviations (e.g. KF-1, KF-2).
- The written program does not specify what type of approved cleaner will be used, only “approved cleaner”.
- The written program does not address sanitation of product handling/operations.
- The written program does not indicate how temperature control will be monitored when the product trailer is loaded with multiple day’s production, particularly weekends, and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the trailer may be used to transport product from multiple days of production.
- The written program addresses pre-operation sanitation of the finished product trailer, but does not address sanitation once the product is loaded and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the trailer may be used to transport product from multiple days of production.
- The finished product trailer pre-operational sanitation states the surfaces will be dried before product is loaded into the trailer, but does not address how sanitation will occur if previous day’s product is already loaded and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the trailer may be used to transport multiple days of production product.

- The written program does not identify when the monthly selection of verification and then subsequent random selection of verification procedures will occur (e.g first day of the month, etc.).
- The written program describes frequencies of verification and monitoring which contradict written frequencies in other pages in the SSOP plan.
- The written program does not identify an actual value for an acceptable temperature for the hot water sanitizer.
- The written program does not identify when the daily pre-operational sanitation of the hotbox will occur and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported that slaughter will be a continuous process and processing will also be occurring thus blocking access to the hotbox for sanitation.

#### Slaughter Written SSOPs:

- The written program does not identify sanitation procedures for the alternative knocking procedure and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported that some horses may be knocked using the chute outside the facility.
- The written program does not identify an actual value for an acceptable temperature for the hot water sanitizer.
- The written program states hand soap is to be used at the hand sink during sticking/bleeding/head removal; however during the review of the facilities no hand soap was observed at this sink.
- The written program addresses the use of blood barrels during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the blood from the animal will be rinsed with a hose, draining through the floor drain in the landing/sticking area to prepare the area for the next animal.
- The written program identifies that the air knife will be sanitized at the siding step and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported a hock cutter is used to remove legs; an air knife was not mentioned.
- The written program does not address the sanitation of the inspection station for heads during the walkthrough and verbal description of the processes, Mr. De Los Santos reported and demonstrated where FSIS will inspect heads following their removal from the carcass and prior to disposal.
- The written program does not address the sanitation of the anti-microbial spray container, hot water bath container, or hot water bath.

#### Processing Pre-operational Written SSOPs:

- The written program identifies electric equipment which is to be monitored and the lockout/tagout written program does not address these items. Additionally, during the walkthrough and verbal description of the processes, Mr. De Los Santos reported a hand saw will be used to break the carcass halves into quarters and the hand saw is not identified in the written program.
- The written program identifies the use of footbaths, but does not identify what agents will be used or the locations of the baths.
- The written program does not identify an actual value for an acceptable temperature for the hot water sanitizer.
- The written program does not specify when verification selection will occur.

#### Processing Operational SSOPs:

- The written program states employees will be issued clean frocks and gloves each day. During the walkthrough and verbal description of the processes, Mr. De Los Santos reported the one employee will be quartering each of the carcasses and carrying it from the processing room to the finished product trailer and the written program does not address monitoring the frocks or gloves during operations.

#### Pre-operational and Operational SSOP Records:

- Establishment did not provide SSOP records for review.

#### Composting Program:

- The composting program states that composting is done immediately and does not mention who the "designated person" at the establishment is going to be to perform the composting.
- The composting program states that there is a certified operator who is at the establishment at all times while the facility is operating and again does not mention who the "certified operator" at the establishment is.

#### Fly and Pest Control Program:

- The establishment does not describe how many flies is too many before the employee monitoring the flies will take action to control the flies.
- The program states that livestock pens will be washed daily, but the program does not designate if this will be done when there is no animals in the livestock pens and where will this be documented.

#### Flow Chart:

- Establishment has the brisket and evisceration steps together in one step as well as the final wash and antimicrobial spray steps together in the flow chart. Should be separate steps in the process since they have different hazards associated with them.
- Establishment did not address the quartering step in the flow chart.

#### Hazard Analysis:

- In Hazard Analysis, at the step of receiving live equine, the establishment addressed the chemical hazard of residues as reasonably likely to occur, but does not have a CCP for this hazard.
- At the step of stunning/bleeding/removing head, the establishment addressed the biological hazard as None, but states the hazard is reasonably likely to occur.
- The brisket step should be a separate step in Hazard Analysis and need to address contamination of saw. Also address the biological hazard of BSE for this step.
- At the step of splitting, the establishment does not address any biological hazards, but then at the step of trim rail all of a sudden hazards are introduced and referenced to have come from the previous step.
- At the step of QC inspection, there are no biological hazards addressed and it is CCP 1 [REDACTED]
- At the final wash step, the establishment does not address biological hazards nor justification.
- Establishment does not address the quartering step in Hazard Analysis.

- At the step of antimicrobial spray, the biological hazard should not be reasonably likely to occur. The est. can address at the prior step (at the step of final wash, the biological hazard as reasonably likely to occur).
- At the step of finished product storage, the establishment addresses BSE.
- In the remaining steps in the process (ex. Finished product storage), there are no biological hazards addressed and no support for GMPs/Temperature Control.

#### HACCP Plan Monitoring and Verification Procedures:

- For CCP 1 [REDACTED] the establishment addresses Head Inspection Table for Location and during the walk-thru Mr. Rick De Los Santos, Owner informed FLS [REDACTED] and Dr. [REDACTED] that no heads would be saved for equine.
- In the monitoring procedures for CCP 1 [REDACTED] the establishment mentions variety meats in the monitoring procedures and during walk thru Mr. De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the establishment was not going to process the variety meats.
- For CCP 1 [REDACTED] the establishment does not mention what the quantifiable values will be and what they are.
- For CCP 2 [REDACTED] the establishment addresses variety meats in the monitoring procedures and during walk thru Mr. De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the establishment was not going to process the variety meats.
- For CCP 2 [REDACTED], there is no procedure for how the [REDACTED] concentration will be tested.
- For CCP 2 [REDACTED] the establishment needs to add thermometer calibration record under the records column.
- For CCP 3 [REDACTED] the establishment addresses variety meats in the monitoring procedures and during walk thru Mr. De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the establishment was not going to process the variety meats.
- For CCP 3 [REDACTED] the establishment states this temperature will be monitored to meet critical limits within 24 hours. This prevents inspection of monitoring verification of a Friday slaughter given the establishment cannot/does not operate on Saturday.
- For CCP 3B [REDACTED] the establishment does not address CCP 3B ([REDACTED]) in the Hazard Analysis.
- Under corrective actions for CCP 3B ([REDACTED]) the establishment does not state how long the deviation will be monitored; only states every 2 hours, but not for what period of time.
- CCP 3B [REDACTED] does not identify specifically what location is the cold storage area for finished product and during the walkthrough and verbal description of processes, Mr. De Los Santos had indicated the cold storage area would be the product trailer.
- Product temperature is not addressed again after CCP 3 is taken to ensure temperature is within limits within a time frame from slaughter and during the walkthrough and verbal description of processes, Mr. De Los Santos reported finished product might be held overnight on the product trailer. Finished product temperature is not addressed.

#### HACCP Record Keeping Documents:

- CCP 2 [REDACTED] Monitoring Record does not have a space for temperature recording
- Thermometer calibration record must record both hot and cold calibrations.

- No document was presented as the pre-shipment review record.

Supporting Documentation:

- Unsure if supporting documentation for other red meat species will be acceptable for equine species when equine is not specifically cited in the reference material

HACCP Process Category Description Outline:

- Product description identifies whole carcass and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the carcasses will be split in halves during slaughter and quartered before loading onto the trailer.
- Packaging material identifies boxes and vacuum seal bags and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the finished product will not be packaged and if it is, the quarters will be placed in lined combo boxes.
- The shelf life is provided and includes for freezing duration and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the slaughtered product is to be quartered the next day of operations and loaded on the trailer (no freezing).
- The company plan states export and Mr. De Los Santos has reported the company will be shipping the product to another inspected establishment [REDACTED].
- The company lists [REDACTED] under other ingredients and during the walkthrough and review the materials indicate the plant intends to use this product below the concentration required for an ingredient declaration.
- The company plan lists meat and variety meats and the ingredients are live horses and during the walkthrough and verbal description of the processes, Mr. De Los Santos reported the company would only be producing carcass quarters.

*E. coli* and *Salmonella* Sampling Program:

- The program does not state when the establishment will be sampling carcasses (for ex., before quartering carcasses or after quartering carcasses).
- The way the establishment is going to sponge the carcass when collecting the sample was unclear. The establishment stated that they were going to sponge from the flank, brisket, and "inside round". Was unclear what the establishment meant by the "inside round".
- *Salmonella* was included in the title of the *E. coli* program and it was unclear if the establishment was going to also perform *Salmonella* sampling procedures as well.
- The Hazard Analysis identifies *E. coli* O157:H7 as reasonably likely to occur, but the sampling program does not identify any verification procedures for controlling this hazard.

Outside and Inside Tour of Establishment:

- The alternative side knocking area for crippled equine is still under construction. The knocking area needs to be adjusted to accommodate equine.
- The knocking area needs to be adjusted. On Monday, March 12, 2012, a cow did not fit in the newly constructed knocking area. The establishment has to make adjustments to accommodate equine.
- The establishment needs to add soap dispensers at the steps of bleeding/removing head station. Establishment will add additional sterilizers behind the head wash station. The head wash station table will be raised waist high.

- At the step of evisceration, Dr. [REDACTED] and FLS [REDACTED] had concerns how the establishment was going to perform this step without contaminating the equine carcass since the necks on the equine are longer than cattle and will have to be turned in a way so that they don't get contaminated by the gut buggy.
- During the tour, Mr. Rick De Los Santos, Owner informed FLS [REDACTED] and Dr. [REDACTED] that he plans to take out all the plastic strips on the doors in the processing room and will replace with doors since employees will be going in and out of door areas in the processing room when carrying the carcass quarters and taking them into the trailer which will be the finished product storage area. FLS [REDACTED] and Dr. [REDACTED] observed that the plastic strips were still on all the doors in the processing room.
- There is no hot water sterilizer in the processing room and this is where the establishment plans to quarter the equine carcasses.
- Unsure if the flooring in the pen areas will be acceptable as well as the footing in the chute entrance. FLS [REDACTED] and Dr. [REDACTED] would like to ask Dr. [REDACTED] about the flooring that the establishment currently has.
- FLS [REDACTED] and Dr. [REDACTED] had concerns with the trailer which will be the finished product storage area. The way the establishment's process is written, the trailer is considered a part of their establishment right now. According to Mr. Rick De Los Santos, Owner, the trailer will be transporting product from his establishment to [REDACTED].

Mr. Rick De Los Santos, Owner informed FLS [REDACTED] and Dr. [REDACTED] that he would work on the items noted above and would let Dr. [REDACTED] know when they would be ready for FLS [REDACTED] to come back and do another walk through of the establishment.

The meeting ended at 1100 hours.