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Food Safety  
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### Memorandum of Interview

On Monday, March 12, 2012, at approximately 0900 hours Frontline Supervisor (FLS) [REDACTED] and Supervisory Public Health Veterinarian (SPHV) [REDACTED] conducted a walkthrough of the facilities for equine slaughter with Mr. Rick De Los Santos, Owner, [REDACTED], Mr. Eddie De Los Santos, Slaughter Q.C., and [REDACTED] Employee/Owners son. Also in attendance was [REDACTED], Intermittent 7. FLS [REDACTED] asked Mr. Rick De Los Santos if he could show Dr. [REDACTED] and FLS [REDACTED] the basic equine slaughter process from start of operations until the end of operations.

Mr. Rick De Los Santos first showed FLS [REDACTED] and Dr. [REDACTED] the pen area and pointed out where the equine would be unloaded and in which pen the equine would stay in prior to slaughter. Dr. [REDACTED] asked Mr. Rick De Los Santos how many equine the establishment plans to slaughter a day and Mr. Rick De Los Santos stated he plans to slaughter [REDACTED] a day and possibly more if his business picks up. FLS [REDACTED] asked Mr. Rick De Los Santos where the suspect pen will be and Mr. Rick De Los Santos hesitated and stated that he could use the front pen area as the suspect pen. Dr. [REDACTED] asked where the access to water would be provided in the antemortem holding area once the horses were moved. Mr. Rick and Eddie De Los Santos conferred and decided they would leave the gate area open to the pen and Mr. Eddie De Los Santos reported the company could line the horses up for slaughter and according to Dr. [REDACTED] (DVMS), the horse would not need to be provided access to water for four hours if they were in line for slaughter. Dr. [REDACTED] reported she would consult with Dr. [REDACTED] on the time animals may go without water. Dr. [REDACTED] asked if the establishment was also going to be using the side knocking area for crippled equine since the establishment has been using it for cattle (the access to the side knocking area is from one of the pens which the company indicated will be used to hold horses and move them for antemortem inspection) and Mr. Eddie De Los Santos reported the company could put a lock on the gate which leads from the pen to the side area. Mr. Rick De Los Santos then said that he does plan to use the side knocking area as well. FLS [REDACTED] and Dr. [REDACTED] walked over to the side knocking area and observed construction debris piled in the area and that it needs to be adjusted to accommodate equine since the height of the steel poles at this time only could accommodate cattle. Dr. [REDACTED] asked Mr. Rick De Los Santos how the establishment plans to knock the equine on this side knocking chute area since the equine will be able to see the person standing in front of them. Mr. Rick De Los Santos said that knocking will be done in front of the animal and all employees will be trained in knocking and that the [REDACTED] will be used with [REDACTED] as a back up. Mr. De Los Santos reported the horses will be knocked in the forehead at the "X's" like cattle.

FLS [REDACTED] and Dr. [REDACTED] moved into the main knocking chute area and as FLS [REDACTED] and Dr. [REDACTED] walked up into the chute entrance, Dr. [REDACTED] observed the footing in the chute entrance might be difficult for equine since they have different shaped hooves than cattle. Dr. [REDACTED] informed Mr. Rick De Los Santos that she would ask Dr. [REDACTED] District Veterinary Medical Specialist about that and get back to him. Mr. Rick De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the top horizontal rail leading into the knocking chute area had been raised and explained that knocking will be on the forehead and will knock at [REDACTED] with one knock with security in the back. FLS [REDACTED] and SPHV [REDACTED] observed a silver chest piece in the knocking chute and Mr. De Los Santos explained it could be moved forward for smaller animals and backward for larger animals.

At the bleed rail step, Mr. Rick De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the establishment will hang equine at knee if the equine are long. Dr. [REDACTED] asked Mr. Rick De Los Santos where the employee will be making the sticking into the equine and Mr. Rick De Los Santos said sticking will be made in the neck. SPHV [REDACTED] explained equine necks are long and where exactly does the company intent to stick the animal. Mr. Rick De Los Santos stated the neck behind the cheek and then sliced upwards toward the chest. Dr. [REDACTED] asked Mr. Rick De Los Santos approximately how long will the process of knocking to sticking take and Mr. Rick De Los Santos said that it should take approximately [REDACTED]. Dr. [REDACTED] asked how long would the side knocking and sticking for the crippled equine take and Mr. Rick De Los Santos said that it would take approximately [REDACTED]. FLS [REDACTED] and Dr. [REDACTED] informed Mr. Rick De Los Santos that there was no soap dispenser at the steps of bleeding/removing head station area.

Mr. Eddie De Los Santos, Slaughter Q.C. described the next couple of slaughter steps to FLS [REDACTED] and Dr. [REDACTED]. Mr. Eddie De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the next steps in the process will be to take off the right leg by cutting between the hoof and the hock, and once this is done will cut open the hide to the back and will then cut the front legs off at the knees. Mr. Eddie De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that once this is all done the hide will be taken off by the automatic hide puller, the hides will then be taken into the inedible room where they will salt the hides. Mr. Eddie De Los Santos showed FLS [REDACTED] and Dr. [REDACTED] the inedible room. Dr. [REDACTED] asked Mr. Eddie De Los Santos what the establishment will do with the hides and Mr. Eddie De Los Santos said that the establishment plans to sell the hides. Mr. Eddie De Los Santos showed FLS [REDACTED] and Dr. [REDACTED] where the split brisket step will be and informed FLS [REDACTED] and Dr. [REDACTED] that the establishment will sanitize the saw in between each equine carcass and will use extra sanitizer if there is fecal matter observed. SPHV [REDACTED] asked if the brisket will be split from neck to chest or chest toward next, and Mr. Eddie De Los Santos reported from chest to neck.

At the evisceration step, Mr. Eddie De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the establishment will have three buggy's for the guts to go into and will have an inspection station on the top part of the buggy's for inspection personnel. Dr. [REDACTED] asked Mr. Rick De Los Santos if the establishment was going to save any viscera and Mr. Rick De Los Santos that at this time they plan to not save any viscera. 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. Mr. Eddie De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the establishment was going to sanitize each buggy in between each equine carcass.

At the step of split carcass, Dr. [REDACTED] asked Mr. Eddie De Los Santos how the establishment was going to accommodate equine carcasses at this step since the way the establishment has it set up right now on the slaughter floor, the platform to stand on would not be able to reach the top of the equine carcass. Mr. Eddie De Los Santos informed Dr. [REDACTED] that the establishment would make sure the employee performing this step would be tall enough to reach the top of the equine carcass. Mr. Eddie De Los Santos informed Dr. [REDACTED] that the establishment has one employee right now that will be tall enough to perform the split carcass step.

Mr. Eddie De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the next couple of steps in the process will be the trim step and Mr. Eddie De Los Santos said that the establishment would keep inedible barrels by the trim station to put trim in, then the establishment will weigh carcass, and perform the zero tolerance check. The next steps in the process will be carcass wash where carcasses will be sprayed with hot water and the establishment will wash one carcass at a time. SPHV [REDACTED] asked Mr. Rick De Los Santos if the company intended on having a continuous flow and Mr. Rick De Los Santos reported they did. SPHV [REDACTED] asked how the company was going to accommodate a trimmer, inspection, and a bogey during evisceration in the same space at the same time. SPHV [REDACTED] also asked how the bogey would be able to be driven back to the inedible room if carcasses were blocking the exit. Mr. Eddie De Los Santos stated the company could do final inspection at the company trim section and SPHV [REDACTED] pointed out the employees would then be reaching over Inspection with their knives to reach the sanitizer and that the lighting would need to be moved for final rail inspection. Mr. Rick De Los Santos reported the company would keep the steps as they are and just operate without contaminating. SPHV [REDACTED] asked if the company was going to wash each carcass as it passed final rail or multiple carcasses at a time. Mr. Rick De Los Santos reported one at a time and SPHV [REDACTED] stated the current practice by the company is up to five at a time. Mr. Eddie De Los Santos then stated the company might wash more than one carcass at a time. Mr. Eddie De Los Santos stated that each carcass will drip for [REDACTED] and will then be sprayed with [REDACTED] from top to bottom and side to side. Mr. Eddie De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that once the carcasses are sprayed with [REDACTED] they are then moved into the hot box for 24 hours. Dr. [REDACTED] asked how many carcasses can the hot box hold and Mr. Rick De Los Santos said that the hot box can hold approximately [REDACTED] and mentioned if they were to have more equine carcasses that the establishment would move the carcasses into the cooler.

Mr. Rick De Los Santos showed FLS [REDACTED] and Dr. [REDACTED] the head wash station area and informed FLS [REDACTED] and Dr. [REDACTED] that the establishment does not plan to save the heads of the equine. Mr. Rick De Los Santos stated that the heads will be denatured and will be put in the inedible room. Mr. Rick De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that the head wash station table will be raised waist high for inspection personnel to inspect the heads and will add additional sterilizers behind the head wash station. SPHV [REDACTED] asked if the head inspection table, although lower than the company has planned, will be oriented in the same way, which is directly in front of the kill floor entrance door and the inspector is standing in the footbath. Mr. Rick De Los Santos reported the company would move the footbath to outside the kill floor endurance door.

Mr. Rick De Los Santos informed FLS [REDACTED] and Dr. [REDACTED] that once the equine carcasses are in the cooler, the establishment will process the carcasses into quarters in the cooler and carry the quarters through the processing room, bisecting the hallway to the other processing room (approximately three feet) and load into the trailer backed up to the loading dock door. SPHV

█████ asked how the carcasses would be quartered and Mr. Rick De Los Santos reported with a hand saw. SPHV █████ how many employees will be working on each carcass and Mr. De Los Santos reported one. FLS █████ informed Mr. Rick De Los Santos he would need to have a hand sink and hot water sanitizer in the cooler/cold storage room if the company was going to process product in there. Mr. De Los Santos then stated the processing room in front of the loading area will be used to quarter the carcasses. FLS █████ and Dr. █████ pointed out to Mr. Rick De Los Santos that there was no hot water sterilizer in the processing room and this is where the establishment plans to quarter the equine carcasses. Mr. Rick De Los Santos stated that once the carcasses are quartered, the employee will carry the quarters into the trailer which will be the finished product storage area. Dr. █████ asked Mr. Rick De Los Santos about the plastic striping that is currently on the doors in the processing room and stated since the employees will be going in and out of the processing room moving the carcass quarters into the trailer how will the plastic striping be kept cleaned and sanitized. Mr. Rick De Los Santos informed Dr. █████ 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. SPHV █████ asked if Mr. De Los Santos intended to leave the swinging doors open during processing and said yes. Mr. Rick De Los Santos reported it should only take about one hour to quarter the previous day's slaughter and load. FLS █████ and Dr. █████ 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 the █████. No trailer was available for review. SPHV █████ asked Mr. Rick De Los Santos if the company was not going to use the processing room which had recently been added to the facility. Mr. De Los Santos questioned that it would need to be reviewed if he wanted to use it and FLS █████ stated all rooms needed to be reviewed if they were part of the process. While reviewing the larger processing room, Mr. Rick De Los Santos stated halves would be quartered and carried through the swinging double doors left open during processing and loaded into a product trailer parked at the loading dock on this side of the building (there is a small area between the swinging double doors to the processing area, entrance to the large freezer, and access to the loading dock; approximately fifteen feet wide by twenty five feet long). FLS █████ pointed out the plastic striping at the loading dock door and asked how the company would address the plastic strips. Mr. █████ reported the company would just sanitize the strips each day. Mr. Rick De Los Santos stated that is not what the company would do; the company would tie the strips out of the way during processing or replace the strips with solid doors. SPHV █████ asked if the solid doors would be left open during processing and Mr. Rick De Los Santos reported yes.

Upon exiting the large processing area, SPHV █████ asked Mr. Rick De Los Santos where footbaths would be placed around the processing areas. Mr. De Los Santos reported he did not intend to use footbaths and they were not in the SSOP. SPHV █████ stated she had thought they were part of the current program and Mr. Rick De Los Santos reported he could use footbaths at the entrance to the processing area as he does now.

The walkthrough of the facilities for equine slaughter ended at approximately 1045 hours.

FLS █████ and Dr. █████ reviewed the SSOP program, HACCP program, *E. coli* Sampling program, Composting program, Fly and Pest Control program, supporting documentation for the

critical control points, water potability certification, sewage certification, and EPA for composting certification for the rest of the day.

Approximately one hour after the guided walkthrough, [REDACTED], Intermittent 7 informed Dr. [REDACTED] and FLS [REDACTED] that a cow did not fit in the newly constructed knocking area. The establishment had to make adjustments to the knocking area to accommodate the cow.

On March 13, 2012, at approximately 0855 hours, FLS [REDACTED] reviewed the establishment's Lock Out/Tag Out program and the Hazard Communication program.