



United States  
Department of  
Agriculture

Food Safety and  
Inspection Service

Washington, D. C.  
20250

To: RICARDO DE LOS SANTOS

From: [REDACTED]

Date: 3/16/2012

Meeting Start Time: 11:00 AM

FSA:

Open NRs:

NRs Under Appeal:

Subject: Establishment Awareness Meeting Agenda

Sampling:

FSIS: Directed – MT43/43S – collected and submitted 3/9 on ground beef, reported negative/acceptable to the company on 3/12.

Establishment: E. coli O157:H7 negative for beef trim sample 12/15/11. Ground product last sampled in 11/2011. During the meeting Mr. Rick De Los Santos reported a sample would be collected next week.

Old Business:

1. NR status: 0 new NRs, 1 Under Appeal, 2 in verification, In total, 8 OPEN noncompliance records.

New: None

Open and no written response yet provided:

YJL4710033109N: SSOP records not completed by the next day of operations 3/8. OPEN. No written response yet received.

YJL3909032601N: Rust on carcass wash walls 3/1. OPEN. No written response yet provided.

YJL0216021924N: Humane handling slips and falls of 3 beef cows 2/24: OPEN. No written response yet provided. During the meeting, Mr. De Los Santos reported the company is planning on using black rubber mats in the area.

Open and written response needed additional information provided by the establishment:

YJL4712025829N: No ground beef product temperature CCP taken on 2/28, 2/29. OPEN. Ground product produced 2/28/12 released 3/9. Mr. Rick De Los Santos had provided SPHV [REDACTED] with a written corrective action response on 3/8; however the company had not completed the written response on the noncompliance record, and SPHV [REDACTED] requested the NR be completed. During the meeting, Mr. Rick De Los Santos provided SPHV [REDACTED] with the NR and a copy of the corrective actions page. SPHV [REDACTED] observed employee training was written as the plant's further planned actions and she requested to review the training log. Upon review of the training log, SPHV [REDACTED] noted to Mr. De Los Santos, the training sheet for Mr. Eddie De Los Santos left the "Employee Responsibilities" section blank. Mr. Rick De Los Santos then filled in HACCP and SSOP monitoring and verification, and SPHV

█████ pointed out that Mr. Eddie De Los Santos had not received that information or training on those responsibilities during his training as indicated by the record. Mr. Rick De Los Santos had Mr. Eddie De Los Santos enter the office and Mr. Rick De Los Santos informed Mr. Eddie De Los Santos of the responsibilities. SPHV █████ asked if Mr. Rick De Los Santos should clarify the training given the recent issues (Mr. Eddie De Los Santos had not recorded the HACCP monitoring at the time of event on 3/14 and Mr. Rick De Los Santos had to retake the CCPs). Mr. Rick De Los Santos explained to Eddie De Los Santos the HACCP records needed to be completed at the time of event with values and times written in and the SSOP records have a longer window to record, but Mr. Rick De Los Santos would prefer SSOP records also be completed at the time the monitoring occurs. Mr. Eddie De Los Santos indicated he understood and resigned the training record. The NR will be left open to verify the further planned action is effective.

YJL4913034807N: Raw intact critical limit deviation 3/7. OPEN. Product released 3/9. Mr. Rick De Los Santos had provided SPHV █████ with a written corrective action response; however the company had not completed the written response on the noncompliance record, and SPHV █████ requested the NR be completed. During the meeting, Mr. Rick De Los Santos returned the NR and a copy of the corrective actions document to SPHV █████. Upon review of the document, SPHV █████ informed Mr. De Los Santos the document would remain open in verification to verify two product temperatures are taken per shift has identified. Mr. De Los Santos replied that was only applicable to Boning Room 1 and SPHV █████ gave Mr. De Los Santos the corrective actions document back which did not specify a processing room. SPHV █████ reviewed the written response on the NR and observed the company had specified Boning Room 1 under further planned actions and reported this to Mr. De Los Santos. Mr. De Los Santos changed the written response on the NR to match the corrective actions document. SPHV █████ stated the documents needed to be consistent.

Open and under appeal:

YJL4616124628N: Processing hand saw hung on cooler door latch 12/28. UNDER APPEAL. Mr. De Los Santos provided SPHV █████ with the NR with written appeal

12/29/11. SPHV █████ provided a written response on 1/4/12 denying the appeal. Mr. De Los Santos reported he would accept; however no written acceptance has been received by FSIS. During the meeting, Mr. Rick De Los Santos provided SPHV █████ with a written response accepting the original noncompliance record. SPHV █████ reported she would return the original NR document after the meeting for Mr. De Los Santos to complete.

Open and in verification:

YJL011113528N: Ice condensate on freezer curtains and floor 11/28: OPEN. A written response has been provided; however SPHV █████ has observed the continued presence of ice condensate on curtain flaps and freezer floor. As of the time of the meeting, SPHV █████ has observed significant ice condensate on the curtains and floor around the access door, but noted no product to yet be directly affected.

YJL5510013305N: Cracks and gouges with meat particles and residue observed during pre-operational sanitation verification 1/5. OPEN. Written response provided 2/6 and will be left open to verify the table belt is repaired or replaced. Mr. De Los Santos had reported the belt will be replaced with the facility upgrades for equine operations.

2. Horse Slaughter. Facility review and walkthrough performed by FSIS 3/12-3/13/12. FLS █████ with generate a Memorandum of Interview (MOI) from the exit meeting.

3. Slaughter volume: During the 3/13 exit meeting regarding FLS █████ review of the facilities and equine operations programs, Mr. De Los Santos reported he would update SPHV █████ with a date when inspection would no longer be needed. On 3/15, Mr. De Los Santos reported the company would need inspection to slaughter 2 beef cows and 14 sheep on Tuesday 3/20. During the meeting, SPHV █████ asked if this was still correct. Mr. De Los Santos reported yes. SPHV █████ asked if the company knew which days they would be processing the beef slaughtered on 3/12. Mr. De Los Santos reported processing would occur on Thursday and Friday next week and Mr. De Los Santos should have a plan regarding future operation activities next week.

4. NSOA: The company verification plan has not been altered to reflect changes in ammunition choices. During the meeting Mr. De Los Santos reported he would bring [REDACTED] for slaughter next Tuesday and then discuss with Dr. Wagner changing the verification plan.

**New Business:**

1. During the meeting, SPHV [REDACTED] asked Mr. De Los Santos if he had completed the pre-shipment review for ground product produced on 3/8 and 3/9. On 3/15, when asked for the pre-shipment reviews for those dates, Mr. De Los Santos reported the record keeping had been recorded on the raw intact HACCP documents and no pre-shipment review had yet been completed; the raw intact record was reviewed by SPHV [REDACTED]. During the meeting, Mr. De Los Santos reported he had completed the reviews and showed SPHV [REDACTED] the records. SPHV [REDACTED] reminded Mr. De Los Santos to maintain the raw intact records on file as these were the official records for the raw ground product on 3/8 and 3/9.

2. During the meeting, SPHV [REDACTED] supplied Mr. De Los Santos with the email received by SPHV [REDACTED] from Ms. [REDACTED] regarding the reservation of E 371 for Valley Meat Company to use for equine operations. SPHV [REDACTED] stated Mr. De Los Santos could contact Ms. [REDACTED] with any questions, as the email was the extent of the information SPHV [REDACTED] had received on the matter. Mr. De Los Santos reported he had submitted the original grant of inspection for equine as requested by the Denver District Office on 3/13 and SPHV [REDACTED] had provided the company with a blank 5200-1 form per their request 3/13.

3. On 3/12-3/13/12, FLS [REDACTED] with assistance from FLS [REDACTED] reviewed the establishment's facilities and written programs for equine slaughter and processing operations. An exit meeting was held 3/13/12 and FLS [REDACTED] will be preparing a memorandum of interview (MOI).

4. Immediately following the exit meeting 3/13, Mr. De Los Santos verbally presented the company concern SPHV [REDACTED] will not be able to perform equine inspection in an unbiased manner. A separate MOI will be generated by FLS [REDACTED] to document this meeting topic.

5. Plant Business: On 3/15, at approximately 1050 hours MDT, Mr. Rick De Los Santos had asked SPHV [REDACTED] a question pertaining to the next FSIS review for equine operations. SPHV [REDACTED] advised Mr. De Los Santos to contact FLS [REDACTED] with any questions because SPHV [REDACTED] was no longer independently participating in the establishment equine operations proposals, given the company's concerns reported 3/13. SPHV [REDACTED] asked Mr. De Los Santos if he needed the email contact for FLS [REDACTED] and Mr. De Los Santos reported he would appreciate if SPHV [REDACTED] would write it down. The government email address for FLS [REDACTED] is: [REDACTED]@fsis.usda.gov

During the meeting, Mr. De Los Santos asked if he should ask SPHV [REDACTED] any questions first or just defer all equine questions to FLS [REDACTED]. SPHV [REDACTED] reported Mr. De Los Santos could ask SPHV [REDACTED] however, it is unlikely to be appropriate SPHV [REDACTED] provide an answer given the company's concerns with SPHV [REDACTED]. SPHV [REDACTED] reported the email for FLS [REDACTED] would go to her blackberry and FLS [REDACTED] could provide a phone number if needed. Mr. De Los Santos indicated he understood by nodding.

Mr. De Los Santos reported no further plant business.

The meeting closed at 1125 hours MDT

**ADDENDUM:** SPHV [REDACTED] provided Mr. De Los Santos with the original noncompliance record YJL4616124628N for Mr. De Los Santos to complete the written response at the same time as deliver of this MOI on 3/16/12.