

## Simmons, Liz - FSIS

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**From:** Kiecker, Paul - FSIS  
**Sent:** Monday, April 22, 2013 7:52 AM  
**To:** Gilmore, Keith - FSIS  
**Cc:** Tawadrous, Armia - FSIS; Bane, Robert - FSIS; Thompson, Eric - FSIS; Cornett, Julie - FSIS  
**Subject:** FW: EST 20575 Rains Natural Meats Gallatin MO, 2013-04-17 FLS-EIAO-DVMS review reports

Attached is the information regarding the applied horse slaughter facility in the Springdale District. The responses below are from the FLS, SEIAO, and DVMS who were on hand. Please forward and use the information as needed for completion of the NEPA analysis.

Let me know if you have any additional questions.

Thanks,

Paul Kiecker  
District Manager  
Springdale District Office  
Office of Field Operations  
Food Safety and Inspection Service  
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[paul.kiecker@fsis.usda.gov](mailto:paul.kiecker@fsis.usda.gov)

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**From:** Thompson, Eric - FSIS  
**Sent:** Friday, April 19, 2013 4:07 PM  
**To:** Kiecker, Paul - FSIS  
**Cc:** Thompson, Eric - FSIS; Bane, Robert - FSIS; Cornett, Julie - FSIS  
**Subject:** EST 20575 Rains Natural Meats Gallatin MO, 2013-04-17 FLS-EIAO-DVMS review reports

Good Afternoon Paul,

Below are the reports from the three district personnel that visited Rains Natural Meats on 2013-04-17. It includes the NEPA information gathered, along with the EIAO and DVMS assessment of the plans and facilities. If you need any more information please let me know. Thank you.

Eric Thompson  
Deputy District Manager  
United States Department of Agriculture  
Springdale District Office  
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**From:** Clarkson, Robert - FSIS  
**Sent:** Thursday, April 18, 2013 5:10 PM  
**To:** Thompson, Eric - FSIS  
**Cc:** Bane, Robert - FSIS; Cornett, Julie - FSIS; Kiecker, Paul - FSIS; Trout, Bryan - FSIS  
**Subject:** 2013-04-17 EIAO and FLS review of Rains Natural Meat-Equine Slaughter est. 20575

Good Evening Mr. Thompson,

We visited Est. 20575-Rain's Natural Meats and I was able to verify the following info yesterday. I made sure they were aware it was not a final walk thru. They were informed a final walk thru would be completed when the residue issues were sorted out and their grant could be processed. Dr. Trout handled the HACCP issues. Dr. Ganzel handled the HH components.

The facility is approximately 5300 square feet and was built in 1998. The address for the facility is 23795 260<sup>th</sup> Street, Gallatin, MO 64640. The plant sits on a 5 acre site owned by Pro-Show Enterprises, a corporation involving the Rain's family, and does business as Rain's Natural Meats. The plant is located in Davies County. In discussion with the owner, he stated Davies County has no zoning or special permit requirements that govern his location and that he has not received any citations or nuisance complaints from Local, State, or Federal authorities. He also stated no Historic sites or protected areas adjoined his property. I do not know if the county contains any. I verified the following information off of permits and approvals available in his HACCP paperwork:

The facilities waste system includes a septic system and a lagoon. Sewage proceeds to the lagoon after passing through a septic system along with other effluent from the plant. The lagoon permit states it is "An anaerobic lagoon with a grease trap to serve a slaughterhouse/meat processing plant and a beef feedlot." A beef feedlot has not been added to the load of the lagoon, it never commenced operation. The legal description for the location is SE1/4, SE1/4, SE1/4, Sec. 10, T59N, R27W, Davies County. The lagoon capacity is [REDACTED]. It was approved on Dec. 19, 2006 by Missouri Department of Natural Resources-Water Protection Program, P.O. Box 176, Jefferson City, MO 65102. The closest receiving stream is an unnamed tributary of the Grand River. The first classified body of water is the Grand River. Prior to installation of the lagoon, effluent was hauled into the City of Gallatin for treatment under permit.

No wells serve the facility, potable water is provided by Davies Co Public Water Supply District #2. The most recent test result present was collected 3/12/2013. The test result stated coliforms were absent and the sample was considered safe. In 2008, Davies Co certified that the meter on the property contained a backflow device.

Solid Waste is intended to be handled via re-establishment of an agreement with [REDACTED]. The address for this facility is [REDACTED], [REDACTED] Des Moines, IA 50317. [REDACTED] provides inedible receptacles. 4 barrels labeled 'inedible' were on site.

The facility is located on Hwy 6. Traffic on this highway can be heavy at times due to a tourist destination (Jamesport, MO) approximately 20 miles east of the facility. This is mostly weekend traffic. The retail business from this traffic was part of the original reason the plant was located where it is. The facility plans to slaughter between 5-20 horses per day. I do not see a significant impact on traffic. They are aware the horses have special transport requirements and are not sure exactly what style of vehicle or trailer that will be yet.

Relative to the facility I went through 416.1-416.6. Mainly this was over 416.2 since the plant isn't operating, but I also looked at inedible receptacles and non-food contact surfaces. Here are the findings:

Rodent and Pest control: establishment implements its own rodent and pest control via bait stations and flying insect traps. I did not see any evidence it was ineffective.

Construction: Walls, floors, ceilings appear to meet the requirements of 416.2(b). Rust from lack of use has been removed from rails, freezer latches, etc. Dents and defects in the walls were repaired as needed. Flooring is concrete and is in serviceable condition though a few dings and chips are present around. Coolers were clean;

refrigeration units were not on making it difficult to assess ventilation. The freezer still contained NFS product and deer product; they were informed it would need to be removed.

Lighting: I assessed the lighting in all departments and it was adequate.

Plumbing and Bathrooms: Two bathrooms are present in the facility. Both had hot and cold water and necessary items. The hand wash sinks on the processing floors/slaughter floors needed new valves from lack of use. The establishment stated they were on site to be installed. Floor drains appeared adequate.

Cleaning compounds [REDACTED] use is included in the SSOPS.

Overall, the facility is very close to being ready to operate. I will assess food contact surfaces, utensils, etc. during the final walk through. Please let me know if you have any other questions. Thank you,

**Rob Clarkson, DVM**  
Frontline Supervisor  
Springdale District, Circuit 06  
bb 785-764-9945

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**From:** Trout, Bryan - FSIS  
**Sent:** Thursday, April 18, 2013 7:56 AM  
**To:** Clarkson, Robert - FSIS  
**Cc:** Bane, Robert - FSIS; Thompson, Eric - FSIS; Cornett, Julie - FSIS; Kiecker, Paul - FSIS  
**Subject:** Rains Natural Meat-Equine Slaughter est. 20575

Greetings,

On April 17, 2013, I conducted a follow-up review of the HACCP plan in place at Rain's Natural Meat est. 20575 for Equine Slaughter. The previous review was conducted on March 12, 2013. Several of the previously identified issues had not been corrected.

The establishment has a HACCP plan for Equine Slaughter, it is pretty basic as there are 10 Steps in the Flow Chart and 9 in the Hazard Analysis (two flow chart steps were combined in the hazard analysis). The plan has three CCPs. They are; [REDACTED]. These are pretty similar to what most slaughter HACCP plans would contain and the overall design is sufficient. However there are specific issues that still remain.

- The product description page included the intent to produce "variety meats" for which Cheek meat was listed. However, the establishment indicated that they were going to use a [REDACTED] as their means of stunning the animal. 9 CFR 310.18(b) prohibits the use of cheek meat from animals that were stunned with [REDACTED].
- At the Splitting/quartering step the establishment lists SRMs as a potential biological hazard and indicates that it is not reasonably likely to occur as the spinal cord is removed. SRMs are not associated with equine only beef, so this is probably less than perfect but you could make a point that the establishment is unable to support the decision to include SRMs as a potential hazard. This was previously identified and discussed during the March 12<sup>th</sup> visit. 9 CFR 417.5(a)(1) is the regulatory concern.
- In order to support the critical limits for hot water and chilling, the establishment references articles related to beef production. These articles study the effect of [REDACTED] on beef carcasses. The establishment does not have any supporting documentation to support why these articles would be sufficient to demonstrate control of the pathogen of concern for equine slaughter (Salmonella). This was discussed with the establishment on March 12<sup>th</sup> and the establishment indicated that they would update these articles for equine specific studies. The requirements of 9 CFR 417.5(a)(2) have not been met.
- The establishment does not have supporting documentation for the monitoring and verification procedures and frequencies. I found no supporting documentation specific for the three CCPs for equine slaughter. The establishments bovine slaughter HACCP plan had supporting documentation for beef slaughter CCPs and were thinking that they would apply to the equine slaughter. However, the monitoring/verification procedure and

frequencies listed are not the same for the two different slaughter plans. In addition, the establishment has not conducted beef slaughter in an extended period of time (months) so their old justifications are probably no longer pertinent. This was previously discussed on March 12<sup>th</sup>. The requirements of 9 CFR 417.5(a)(2) have not been met.

#### Drug Residues.

The establishment has changed their drug residue program slightly since the previous visit. Horses will be purchased from individuals/salebarns etc. by members of an Equine Business Group (EBG). Each horse is individually identified and would be able to be traced back to the farm of origin. EGB members will then background (or hold) the horses for 45 days (on March 12<sup>th</sup> they indicated 6 months) after 45 days the animal may be slaughtered. The EGB member will sign an affidavit that no antibiotics have been given in the previous 45 days. Each horse will be blood tested at slaughter to determine ivermectin and phenylbutazone blood levels. Carcasses will be held until negative results are received. Two violations (I don't believe that a time period was specified) and the EGB will be removed from the program. The establishment did not have any information that linked the blood levels of ivermectin and phenylbutazone to the tissue levels. Therefore, a negative blood level may or may not indicate that the tissues levels were also negative. The establishment indicated on March 12<sup>th</sup> that they were going to conduct a study to link blood and tissue levels. On April 17<sup>th</sup>, they indicated that they still intended to conduct this study.

If you have any questions, please let me know.

Respectfully submitted,  
Bryan Trout, D.V.M.  
Supervisory Enforcement Investigations and Analysis Officer  
Springdale District  
USDA/FSIS  
785-806-5842 Blackberry

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**From:** Ganzel, David - FSIS  
**Sent:** Friday, April 19, 2013 1:57 PM  
**To:** Thompson, Eric - FSIS  
**Cc:** Clarkon, Robert - FSIS; Trout, Bryan - FSIS  
**Subject:** Rains Natural Meat-Equine Slaughter est. 20575

Mr. Thompson:

On Wednesday, April 17, 2013 I visited Rains natural Meat-equine slaughter facility to review facilities improvements that could allow for the humane handling and humane slaughter of equines at this facility.

This facility has the following features:

- A dirt livestock receiving pad that has a set of panels arranged to allow the unloading of a small number of horses. They are opened to accommodate the back gates of a low-delivery stock trailer or horse trailer.
- There is no drive alley at this facility; one pen opens to the next pen and so on so horses must be unloaded one or two at a time, moved to the last empty pen, the gates secured and then another set of horses can be unloaded and penned. There are [REDACTED] that could accommodate as many as [REDACTED].
- 1/2inch plywood sheets cover the outside of pen panels that form the set of pens used to secure livestock. Foam insulation padding has been applied to overhead structures and sharp corners where appropriate; to protect animals from injury.
- Plywood has also been used to cover pens.
- Pens have a dirt floor.
- Water will be provided in steel tubs that can be cleaned and refilled between use-if appropriate.
- The only driving aid noted were old fishing poles with flags attached to direct horses.
- The final drive and knock box has a concrete floor that has bar cleats attached to the surface to provide footing and prevent slips or falls.
- The owner indicates he intends to use a [REDACTED] to stun horses--- during this review I advised him to select [REDACTED]

- The knock box is constructed of steel panels and appears sturdy and durable enough to protect animals entering the knock box. There are over-head cross bars that are padded. These were added to this knock box to prevent an animal from rearing in attempts to escape confinement.
- A designated suspect pen is available to hold [REDACTED] animals.

These facilities meet the core requirements for livestock slaughter and the owner understands his obligation to meet all appropriate sections of 9 CFR 313.

These pens are small for horses and will require diligence to insure humane treatment of animals during the unloading, penning and movement of animals from pens to the knock box. This DVMS noted some safety concerns for our inspection team during the stun process with the use of [REDACTED] in the tight quarters of the stun room. It was suggested to Dr. Clarkson that inspection personnel be behind a solid wall when the stun procedure is being performed.

There were no other issues discussed.

Respectfully:

Dave

Dave Ganzel, DVM  
District Veterinary Medical Specialist  
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