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MARTIN'S ABATTOIR
& WHOLESALE MEATS, INC.
WE SPECIALIZE IN BONELESS BEEF - U S D A INSPECTED

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January 20, 1999

97-068N
97-068N-10
W. A. Bullard, Jr.

Dan Inglehart
United States Department of Agriculture
Food Safety and Inspection Service
Room 0157 - South Building
Washington, D.C. 20250

Dear Mr. Inglehart,

First let me introduce myself. I am W.A. Bullard, Jr., Plant Manager of Martin's Abattoir & Wholesale Meats, Inc. (establishment # 6547). Following are some scenarios and questions concerning adulterated product. I urge you to please provide us with clear answers to our questions as soon as possible.

1st Scenario

We slaughter cows and bulls on one day and the next day all are deboned. All carcasses are divided into fore quarters and hind quarters. Front quarters are deboned on flat table tops with a conveyor in the center. Hind quarters are deboned on a separate rail. Conveyors from both the flat top table and the hind rail carry trimmings from both fore quarters and hind quarters to one central conveyor that empties into cardboard vats. Vats of trimmings are identified by labeling and loaded for individual customers.

All cuts from fore quarters and hind quarters including ribeyes, strips, top rounds, flats, eye rounds, sirloin tips, sirloin butts, and tenderloins travel by separate conveyor to a packing room where each are packed separately.

Questions:

1. One load of these trimmings consists of 20 vats. The load is broken down into 4 lots of 5 vats each. Each lot has samples taken from each of the 5 vats and samples are tested for Ecoli O157:H7. If any of the lots are conferred positive, how much of the total production is considered adulterated?

2. If we obtain negative Ecoli O157:H7 test results on a load, then after receiving the product our customer also tests each of the 4 lots for Ecoli O157:H7 and obtains a positive result on any of the lots - is any of our production considered adulterated?

2nd Scenario

Production from one day's deboning is delivered to individual customers. Ecoli O157:H7 testing was not required by any customer. Upon receiving the delivery, one customer tests for Ecoli O157:H7 and obtains a confirmed positive result on the 15th vat from this one day's production.

Questions:

1. At what point in production is our product considered adulterated?

Follow Up

If our customer does not test any of our meat, then delivers product to their customer (containing our product) and at that point USDA confirms a positive Ecoli O157:H7 - will our product be considered as a source of the adulterated product?

Sincerely,

W.A. Bullard, Jr.