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Food Safety ♦ QA ♦ Regulatory

January 20, 1999

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USDA – FSIS  
Via Fax: 202-690-0486  
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Follow up questions to this afternoon's *E. coli* 0157:H7 clarification conference call:

**Scenario #1**

A slaughter/boning establishment sends 20 combos of trim to a grinding establishment that produces raw, frozen patties. The s/b establishment uses an *E. coli* 0157:H7 sampling protocol on those 20 combos that includes sublotting into four, 5 combo sublots. Each sublot has a small amount of trim removed from each combo within that sublot which is then composited with the trim from the other 4 combos within that sublot, so there are four composited samples for the load.

**Question set #1 - 1 of the 4 sublots tests positive:**

1. Can the grinder use the 3 sublots that tested negative?
2. Does the grinder need to notify the USDA?
3. Does the s/b establishment need to take further action on other non-tested trim products produced from that same production day that may already be in commerce as trim material or have already been further processed into ground beef chubs at a different location?

**Question set #2 - 2 of the 4 sublots tests positive:**

1. Can the grinder use the 2 sublots that tested negative?
2. Does the grinder need to notify the USDA?
3. Does the s/b establishment need to take further action on other non-tested trim products produced from that same production day that may already be in commerce as trim material or have already been further processed into ground beef chubs at a different location?

**Question set #3 - 3 of the 4 sublots tests positive:**

1. Can the grinder use the 1 sublot that tested negative?
2. Does the grinder need to notify the USDA?
3. Does the s/b establishment need to take further action on other non-tested trim products produced from that same production day that may already be in commerce as trim material or have already been further processed into ground beef chubs at a different location?

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**Scenario #2**

A s/b establishment sends combos of trim to various grinding customers at different locations that produce retail and/or food service ground beef (uncooked). Customers A, B, C have *E. coli* 0157:H7 testing programs on the pre-grind trim similar to the customer in Scenario #1. Customer D does not have a sampling program.

**Question set #1**

1. If Customer A has a positive subplot(s) and Customers B&C do not, is Customer B&C's product subject to a recall or diversion to a cooking operation?
2. Is Customer D's product subject to a recall or be diverted to a cooking operation?

Your quick response to these questions is appreciated. If you need further clarification, please give me a call at 402-241-3261. Thanks!

Sincerely,



Sharon K. K. Beals

Director

Food Safety, Regulatory, Processing QA

CC: Dean Danilson