

#### HALLMARK/WESTLAND MEAT COMPANY

- Coliform/E. coli Meat Sample coliform <100 MPN/gm E. coli <10 MPN/gm
  - E. coli 0157 Meat Sample Zero Tolerance
  - Salmonella Meat Sample Zero Tolerance
  - Total Plate Count Meat Sample <50,000 MPN/gm
  - Coliform/E.coli Beef Carcass Swab Samples Coliform <100 MPN/gm E. coli <5 MPN/gm
9. All aggregated offal items are stored in a separated refrigerated cooler and sprayed with USDA approved Inspexx 200.
10. The company has in place and operational an integrated Workplace & Food Security Program to help augment our Total Food Safety Systems.

#### MARKET WITHDRAW AND RECALL ACTION TEAM

In the event of a product recall/withdraw, the following information should be noted by your Quality Control Personnel.

- Steve Mendell, C.F.O.  
13677 Yorba Ave.  
Chino, CA 91710  
909 590-3340
- Tony Magdow, Purchasing/Sales/Office Manager  
13677 Yorba Ave.  
Chino, CA 91710  
909 590-3340 E-Mail [tonymag@earthlink.net](mailto:tonymag@earthlink.net)
- Stan Mendell, Plant Manager, Processing  
13677 Yorba Ave.  
Chino, CA 91710  
909 590-3340 E-Mail [stanwestland@earthlink.net](mailto:stanwestland@earthlink.net)
- Pablo Salas, Plant Manager, Slaughter  
13677 Yorba Ave.  
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909 590-3340
- Juan Acevedo, Controller/Office Manager  
13677 Yorba Ave.  
Chino, CA 91710  
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#### LOTTING SYSTEM

Carcass halves are individually weighed on a rail scale that records the date, starting time, specific tag numbers, ending time and piece count. Every 60 whole beef carcasses are considered to be an individual lot regardless of time. Each half carcass is individually weighed and then transferred to the fabrication room for further processing. Each lot of beef is completely processed into combo bins or boxed containers. Both the combo bins and boxes contain the date, time of process, lot number, (when applicable) bin number item and are marked as they are filled. When a lot is completely processed another lot is started and the lotting identification system as described above is repeated.

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To Whom It May Concern:

With regards to the USDA mandatory reassessment to eliminate or reduce the risk of E. coli 0157:H7, the following text is our rejoinder:

1. Hallmark/Westland utilizes five (5) science based pathogen reduction/elimination interventions in our state-of-the-art beef carcass process. These well-documented and verified pathogen reduction/elimination interventions are applied to our carcasses prior to our fabrication process. The five stages are listed directly below.
  - a. Three 2-stage Steam Vacuums
  - b. Lactic Acid Cabinet
  - c. Lactic Acid Spray
  - d. Hot Water Pasteurization Cabinet
  - e. Application of the USDA approved Inspexx 200
2. The critical limits for the above interventions are:
  - a. 180 degrees F. for the Steam Vacuum interventions.
  - b. 1.5% minimum to 2.5 % maximum as per the manufactures specifications for both the Lactic Acid Cabinet and Lactic Spray.
  - c. 165 degrees F. minimum to 210 degrees F. maximum for the Hot Water Pasteurization Cabinet.
  - d. As per the manufactures specifications the concentration mix of Inspexx 200 is never to exceed 220 PPM.
3. Daily in-house microbiological testing that is AOAC approved. All test results are filed in chronological order for any needed future references.
4. The interventions that are listed on line #1 have shown to reduce/eliminate pathogens on perishable products. In addition maintaining a surface temperature of 44.6 degrees F. and lower will prohibit the growth of both E. coli 0157:H7 and Salmonella respectfully.
5. Cattle water troughs are washed and cleaned daily, salt licks are re-stocked and the cows are washed down prior to entry to slaughter.
6. Ten (10) carcasses are checked for temperature control after 12 hours following the end of the previous day's kill. The temperature on the surface of the carcass is not to exceed 44.6 degrees F. A laser thermometer is directed onto 3 separate areas on the carcass side with the highest temperature thereafter recorded.
7. As per our written SSOP Program with the USDA all equipment is disassembled for cleaning and sanitizing and are re-assembled following the next days pre-operational inspection by the USDA Inspector-In-Charge.
8. Listed directly below is our established microbial specifications involving both environmental and product testing limits:
  - > Total Plate Counts Pre-op Environmental Samples <=75 MPN/cm<sup>2</sup> B.
  - > Coliform/E. Coli Pre-op Environmental Samples <5 MPN/cm<sup>2</sup>
  - > E. Coli 0157 Environmental Samples Zero Tolerance
  - > Salmonella Environmental Samples Zero Tolerance