



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Denver District Office of Field Operations
Denver Federal Center, Building 45
PO Box 25387
Denver, Colorado 80225-0387
Telephone: (303) 236-9800
Fax: (303) 236-9794

1-22-2010

Director
New Mexico State Government
Health Department: Roswell Health Office
200 East Chisum Street
Roswell, New Mexico 88203-5412
575-624-6050

Dear Mr./ Ms. :

I am the District Manager for the Denver District of the Food Safety Inspection Service (FSIS). We regulate meat, poultry, and egg products for 10 States and 3 territories out of this office including New Mexico. This week I was in Roswell and made a plant review of Est. 7299, Pecos Valley Meats, located at 3845 Cedarvale Road, Roswell, N.M. 88203-9020. The plant is operated by Mr. Ricardo De Los Santos. Plant phone is 575-662-1214.

The establishment is a slaughter and processing operation primarily for Beef. At this time the firm does custom exempt slaughter and also slaughters and processes under federal inspection. My concern is with his disposal of dead animals. Approximately 200 yards behind the facility, Mr. De Los Santos drags dead cattle (mostly old dairy cows) and piles them on a concrete pad where he leaves them to rot. He calls it "composting", but by all appearances rotting would be more accurate. I am told that during fly season the pile literally moves due to maggots. At some point, he then moves the pile a little further back on his property where there are massive piles with hooves, legs, etc. sticking out. These piles are high-perhaps 15 feet. These piles seem extensive and run along his back property line.

The animals for the most part are dairy cows over 30 months of age. These animals are restricted by our Agency in commerce because of the possibility of Specified Risk Materials (SRMs) that can occur in all beef of any age in tonsils and the distal ileum, and occur in higher percentages in cows over 30 months in brain, skull, eyes, dorsal root ganglia, spinal cord, vertebral column, tonsils, and distal ileum. Inverted Prions in these SRMs may be the causative agent of Bovine Spongiform Encephalitis (BSE) ("Mad Cow Disease"). There are still many things not known for sure about BSE but current science causes us to restrict movement of SRMs. Just behind Mr. De Los Santos's property is an earthen berm and then immediately adjacent is a number of silage pits for a dairy. Science believes that SRMs are accumulated in certain feedstuffs (rendered animal tissue) and are extremely resistant to heat. As cattle ingest SRMs, their potential for developing BSE increases.

RECEIVED

FEB 02 2010

Page 2- De Los Santos-1-22-2010

Our concern is SRMs leached through the soil into feedstuffs could be a problem. In addition, the potential for extensive fly problems is obvious. Rodents could also be a problem although we have not observed that.

There is also a settling pond regulated by the EPA on this property about 100-125 yards behind the facility. The liquid is red. I assume that is blood from the slaughter plant. Again the fly problem will be extensive and has been extensive in previous years according to reports I receive.

We control the flies immediately adjacent to and in the federal facility. If flies are present, the operation is stopped until the problem is eliminated.

We have discussed this issue with Mr. De Los Santos. He says he will get a front end loader to remove the first pile within 45 days of 1-20-2010. We are doubtful if this will occur. Since his dead pile is off the federal premise, our authority is lessened. We would appreciate your assessment of this problem and any regulation you can impose to get this health hazard eliminated.

Many States have extensive regulations concerning disposal of dead animals, particularly with the advent of Bovine Spongiform Encephalitis and possible human involvement (Creutzfeldt Jacobs Disease- CJD). Lined or lined pits are two alternatives.

In any case, I want to make you aware of the situation, hope you will evaluate it further, and let me know if there is anything you can do to regulate the situation. Thank you for your time.

Sincerely:



Dr. Ron Nelson
Denver District Manager
USDA, FSIS, FO

Ron. NELSON @ FSIS. USDA -