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Food and Drug Administration
Seattle District
Pacific Region
22201 23rd Drive S.E.
P.O. Box 3012
Bothell WA 98041-3012

August 7, 1997

Telephone: 206-486-8788
Fax: 206-483-4996

VIA FEDERAL EXPRESS

In reply refer to Warning Letter SEA 97-24

WARNING LETTER

Walter J. Houser
Walt's Wholesale Meats-Royal City Feedlot
350 South Pekin Road
Woodland, Washington 98674

Dear Mr. Houser:

An investigation at the Royal City Feedlot located at #8 Road 13 S. W., Royal City, Washington, conducted on June 25, July 2, 3, and 23, 1997, confirmed that you offered animals for sale for food in violation of Sections 402(a)(2)(D) and 402(a)(4) of the Federal Food, Drug and Cosmetic Act (the Act), and that you caused animal drugs to become adulterated within the meaning of Section 501(a)(5).

On April 1, 1997, April 23, 1997 and May 20, 1997 you offered animals for slaughter as human food at Walt's Wholesale Meats, Woodland, Washington. USDA analysis of tissue samples collected from six of those animals revealed the presence of illegal drug residues as follows:

<u>Date</u>	<u>Drug</u>	<u>Quantity</u>	<u>Tissue</u>
May 20, 1997	Sulfamethazine	0.17 ppm	Liver
May 20, 1997	Sulfamethazine	0.50 ppm	Liver
	Sulfamethazine	0.26 ppm	Muscle
May 20, 1997	Sulfamethazine	2.30 ppm	Liver
	Sulfamethazine	1.30 ppm	Muscle
April 23, 1997	Sulfamethazine	80.0 ppm	Liver
	Sulfamethazine	40.0 ppm	Muscle
April 23, 1997	Sulfamethazine	32.0 ppm	Liver
	Sulfamethazine	44.0 ppm	Muscle
April 1, 1997	Sulfamethazine	0.38 ppm	Liver
	Sulfamethazine	0.51 ppm	Muscle

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A tolerance of 0.10 ppm has been established for residues of sulfamethazine in the edible tissues of cattle, Code of Federal Regulations, Title 21, Part 556.670 (21 CFR 556.670).

Our investigation also found that you hold animals under conditions which allow medicated animals bearing potentially harmful drug residues to enter the food supply. For example, you lack an adequate system for: a) maintaining medication/treatment records which identify the animal, the date medicated, the drug, the dosage administered, and the pre-slaughter withdrawal time; b) reviewing treatment records prior to offering an animal for slaughter for human food to assure drugs are used as directed; c) assuring that drugs are used in a manner not contrary to the directions contained in the labeling; d) and holding expired drugs in the daily use drug storage area. Foods from animals held under such conditions are adulterated within the meaning of Section 402(a)(4) of the Act.

You are adulterating the drug [REDACTED] brand of sulfamethazine that your firm uses on cattle within the meaning of Section 501(a)(5) when you fail to use the drug in conformance with its approved labeling. Your practice of administering the drug up to four treatments and 48 hours apart is contrary to the label directions of only administering it twice, 72 hours apart, and if signs are still present to consult a veterinarian. Your failure to follow labeled directions causes the drug to be unsafe to use.

The above is not intended to be an all-inclusive list of violations. As a producer of animals offered for food, you are responsible for assuring that your overall operation and the foods you distribute are in compliance with the law.

You should take prompt action to correct the above violations and to establish procedures whereby such violations do not recur. Failure to do so may result in regulatory action without further notice, such as seizure and/or injunction.

It is not necessary for you to personally ship an adulterated animal in interstate commerce to be responsible for a violation of the Act. The fact that you caused the adulteration of an animal that was sold and subsequently offered for sale to a slaughterhouse that ships in interstate commerce is sufficient to hold you responsible for a violation of the Act.

- You should notify this office in writing within 15 working days of the steps you have taken to bring your feedlot into compliance

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with the law. Your response should include each step being taken or will be taken to correct the violations and prevent their recurrence. If corrective action cannot be completed within 15 working days, state the reason for the delay and the time frame within which the corrections will be completed. Please include copies of any available documentation demonstrating that corrections have been made.

Your reply should be directed to Richard S. Andros, Compliance Officer, at the above address.

Sincerely yours,

Celeste M. Corcoran
Roger L. Lowell ^{for}
District Director