



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Food and Drug Administration
T1402 M

San Francisco District
1431 Harbor Bay Parkway
Alameda, California 94102-7070
Telephone: 510-337-6700

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Our Reference: 29-50063

February 2, 1998

Whit Haguley, President and CEO
Westway Trading Corporation
365 Canal Street, Suite 2200
New Orleans, Louisiana 70130

WARNING LETTER

Dear Mr. Haguley:

An inspection of your medicated feed mill located at 2130 West Washington Street, Stockton, California, during the period of January 21 through 23, 1997, by Food and Drug Administration (FDA) Investigator Alice A. Blair found significant deviations from Current Good Manufacturing Practice (CGMP) regulations for Medicated Feeds (Title 21, Code of Federal Regulations, Part 225). Such deviations cause medicated feeds being manufactured at this facility to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act (the Act).

Our inspection found that for a period of two years and five months your firm has failed to maintain a drug inventory system which shows the expiration dates of the drugs used in the manufacture of liquid feeds; the firm has failed to record any actions taken to reconcile discrepancies on the daily inventory record; there has been a failure to follow your SOP's to investigate a variance of 0.5 pounds on the daily drug inventory record; there was a failure to institute corrective action as a result of an out of limit assay for Tylan 40 which includes provisions for discontinuing distribution; your firm has manufactured and distributed a medicated liquid feed using an expired drug; and your firm has failed to check, date and initial batch production records on a daily basis.

Whit Haguley
New Orleans, Louisiana

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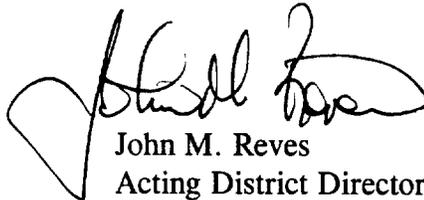
Adulterating or causing the adulteration of drugs after receipt in interstate commerce, and delivering for introduction into interstate commerce of any article in violation of Section 501 or 502, are violations of Section 301(k) of the Act.

You should take prompt action to correct these CGMP violations, and you should establish procedures whereby such violations do not recur. Failure to promptly correct these CGMP violations may result in regulatory and/or administrative sanctions. These sanctions include, but are not limited to, seizure, injunction and/or notice of an opportunity for a hearing on a proposal to withdraw approval of your Medicated Feed Application under Section 512(m)(4)(B)(ii) of the Act and 21 CFR 514.115(c)(2).

This is not intended to be an all-inclusive list of violations. It is your responsibility to ensure that all requirements of the Act are being met.

Within fifteen (15) days of the receipt of this letter, notify this office in writing of the specific steps you have taken to correct these violations and preclude their recurrence. If corrective action cannot be completed within fifteen working days, state the reason for the delay and the time frame within which corrections will be completed. Your response should address each discrepancy brought to your attention during the inspection and in this letter, and should include copies of any documentation demonstrating that corrections have been made. Please direct your reply to Alice A. Blair, Investigator, Food and Drug Administration, P.O. Box 1179, Stockton, California 95201.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John M. Reves". The signature is fluid and cursive, with a large initial "J" and "R".

John M. Reves
Acting District Director
San Francisco District

cc: Bryan Shoemaker Vice President
Westway Trading Corporation
14015 Park Drive, Suite 217
Tomall, Texas 77375

Jack Holm, Terminal Manager
2130 West Washington Street
Stockton, California 95302