

**Establishment Inspection Report**

National Food Corporation  
Everett, WA 98203-5897

FEI: **3003622898**  
EI Start: 11/29/2010  
EI End: 12/16/2010

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**SUMMARY (GTW)**

This comprehensive inspection was conducted according to DFPG Assignment # 10-29, Inspection of Egg Farms for Monitoring Compliance with Egg Safety Rule, and in accordance with 21 CFR 118 - Production, Storage, and Transportation of Shell Eggs, for the Prevention of Salmonella Enteritidis (SE). This team inspection included FDA and Washington State Department of Agriculture (WSDA) members. These inspections were conducted as five separate farm visits which are owned and operated under the corporate structure of National Food Corporation (NFC). A consolidated inspectional close-out of all five farms was held with the President of NFC at the corporate headquarters (FEI: 3003622898) located in Everett, Washington, on December 16, 2010.

The following shell egg producing farms were inspected as part of Seattle Districts Fiscal Year 2010 Phase I of this assignment.

Hilltop Farm – FEI: 3003961513 (Hilltop)

Stanwood Farm – FEI: 3003959978 (Stanwood)

Marysville Farm – FEI: 3007670421 (Marysville) - previous FDA inspection under FEI: 3003303630

Yelm Farms 1 & 2 – FEI: 3003961433 (Yelm 1 & 2 or Yelm 1 or Yelm 2) – registered as one farm

Lind Farm – FEI: 3003961518 (Lind)

A previous inspection of four NFC farms, concluded on March 20, 2003, was limited to the CFSAN compliance assignment in response to a traceback investigation following an SE outbreak. A total of 21 samples were collected from the four farms and included tap water, feed, and environmental swabs of contact surfaces and manure. Eight subsamples from the environmental swabs collected from Lind Farm were found to be positive for SE. Three of the four farms (Stanwood, Yelm, and Lind) were issued a Form FDA 483, Inspectional Observations, for deficiencies found during the inspections and each were classified Voluntary Action Indicated (VAI). No refusals were encountered.

The previous inspection at the NFC corporate location was conducted on February 26, 2010, and was limited to the BSE Inspection Program/Ruminant Feed Ban Rule (Compliance Program 7371.009). No Form FDA 483 was issued, no samples were collected and no refusals were encountered. This inspection was classified No Action Indicated (NAI).

The current inspections consisted of reviewing the SE preventative procedures, monitoring records, and collection of FDA environmental swab samples at each farm. At the conclusion of these inspections and sample collection the following ten items were discussed with the NFC President and Management:

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- 1) Moderate fly activity in laying houses (Stanwood, Yelm 2, and Lind).
- 2) Wild birds on roof top of laying hen houses and the adjacent properties (Marysville). Concern was for the potential of interaction between hens located at this organic facility with the wild birds when the hens are permitted outside.
- 3) Moderate to Low rodent activity inside two laying houses (Marysville and Yelm 2).
- 4) Unscreened openings to the outside environment in laying houses (Stanwood and Yelm 2).
- 5) Minor recordkeeping concerns identified at each farm.
- 6) Sanitization precautions when using shared equipment (Yelm 2 and Lind).
- 7) Unidentified "green slush" (not extensive amount) found on the cement walkway outside a laying house (Stanwood).
- 8) Liquid/fluid/wet manure observed inside the laying hen houses (Marysville).
- 9) Lack of complete investigation for control of documents found to have out-of-limit refrigerated transport temperatures recorded (Hilltop).
- 10) Lack of a site-specific SE Prevention Plan, with approval date and signature on the plan by the Administrator or Management personnel responsible for implementation.

A total of 17 samples were collected from 17 individual hen houses (Hilltop - 1, Stanwood - 4, Marysville - 4, Yelm 1 & 2 - 4, Lind - 4). The total environmental swabs from all five farms inspected consisted of 416 subsamples. The results of all samples collected have been classified as either Lab Class 1 (In Compliance) or Lab Class 4 (No Classification). No Form FDA 483 was issued, and no refusals were encountered. The President of NFC promised to correct most discussion items within 30 days of this inspection close-out.

**ADMINISTRATIVE DATA (GTW)**

Inspected firm: National Food Corporation  
Location: 1930 Merrill Creek Pkwy Ste A  
Everett, WA 98203-5897  
Phone: 425-349-4257  
FAX: 425-349-4336  
Mailing address: 1930 Merrill Creek Pkwy Ste A  
Everett, WA 98203-5897  
Web Site: [www.natlfood.com](http://www.natlfood.com)

"P" numbers: P - 1264 Marysville Breaking Operation  
P - 1264A Marysville Processing  
P - 1747 Lind Processing

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Forms Issued: To Whom:  
 FDA 482 Mr. Brian V. Bookey, President (2)  
 Mr. Roger L. Edwards, Safety Coordinator (4)  
 Mr. Luis A. Riofrio, Food Safety and QA (4)  
 FDA 484 Mr. Brian V. Bookey, President (6)

Samples Collected: Farm and sample numbers:  
 Hilltop (1) – INV 647367  
 Stanwood (4) – INV 604000 through 604003  
 Marysville (4) – INV 635818 through 635821  
 Yelm 1 (2) – INV 647368 and 647369  
 Yelm 2 (2) – INV 647370 and 647371  
 Lind (4) – INV 647372 through 647375

Present at Close-out: Mr. Brian V. Bookey, President  
 Mr. Roger Deffner, Vice President  
 Mr. Randy G. Hansey, Operations Manager  
 Mr. Luis A. Riofrio, Food Safety and QA  
 Mr. Roger L. Edwards, Safety Coordinator  
 Mr. Scott H. Vessel, Production Manager

Dates of inspections: NFC corporate – 11/29/2010 and 12/16/2010  
 Hilltop – 11/29/2010 and 12/1/2010  
 Stanwood – 11/29/2010 and 11/30/2010  
 Marysville (lab) – 11/30/2010 and 12/6/2010  
 Marysville – 12/6/2010 and 12/7/2010  
 Yelm 1 – 12/6/2010 and 12/7/2010  
 Yelm 2 – 12/9/2010  
 Lind – 12/13/2010 and 12/14/2010

Days in all facilities: 15

These were team inspections with the following members from FDA - Consumer Safety Officer (CSO) and or Investigator, and Washington State Department of Agriculture (WSDA); individual participants for each farm inspection will be listed with each farm's section:

FDA

Dirk L. Lincoln (DLL), Lead  
 CSO/Investigator  
 Thomas C. McLean (TCM), Lead CSO  
 Gordon T. Wales (GTW), CSO/Investigator  
 John W. Banks (JWB), Investigator  
 Katherine L. Ernest (KLE), Investigator

WSDA

Daniel J. Maxson, WSDA Food Safety  
 Elaine M. Hagedorn, WSDA Food Safety  
 Lyndon M. Badcoe, WSDA Avian Health Vet  
 Julia K. Neil, WSDA Food Safety  
 Julie A. Walker, WSDA Food Safety  
 Walter R. Strong, WSDA Food Safety

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Scott W. Fox (SWF), CSO  
Jean R. McCurry (JRM), CSO  
Mikel T. Wright (MTW), Supervisory CSO

Claudia G. Coles, WSDA Director of Food Safety, was provided notification of this assignment on or around 11/03/2010, via the assignment e-mail.

Investigators/CSO's that contributed narrative sections and/or attachments to this report are indicated by the individual's initials after the heading of each section. Within this report, "we" and "us" indicates the Investigators that participated at the farm or site being discussed, and "I" indicates the Investigator that composed the section. This final report was written by CSO McLean and approved by SCSO Wright.

On November 29, 2010, the FDA and WSDA team initiated this inspection at the NFC corporate headquarters in Everett, Washington. We presented our credentials and issued a Form FDA 482, Notice of Inspection, to Mr. Brian V. Bookey, President of NFC. On December 16, 2010, another Form FDA 482 was issued to Mr. Bookey to refresh the Notice of Inspection at the NFC corporate headquarters prior to the inspectional close-out meeting. During these inspections at each of the five shell egg producing farms, credentials were displayed, and a farm specific Form FDA 482 was issued as listed below:

Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director

On 11/29/2010, at Stanwood Farm  
On 12/06/2010, at Marysville Farm  
On 12/06/2010, at Marysville Laboratory  
On 12/13/2010, at Lind Farm

Mr. Roger L. Edwards, Safety Director

On 11/29/2010, at Hilltop Farm  
On 11/30/2010, at Marysville Laboratory  
On 12/06/2010, at Yelm 1 Farm  
On 12/09/2010, at Yelm 2 Farm

Six, Form FDA 484, Receipt for Samples, were issued to Mr. Brian V. Bookey, President. The receipts were for Environmental Swab Samples collected during these farm inspections. The Form FDA 484's were issued at the consolidated inspectional close-out on December 16, 2010, at the NFC corporate headquarters in Everett, Washington.

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**HISTORY (GTW)**

According to Mr. Bookey, National Food Corporation (NFC) is a Washington State Corporation that was incorporated on April 26, 1956. The firm's corporate office hours are Monday through Friday 6:00 AM to 4:00 PM. Hours at each farm location vary according to each location; however, typical hours for these facilities are (b) (4) daily. Mr. Bookey stated that NFC has not had the need to conduct a recall since the previous recall and SE trace back inspection conducted in 2003.

(b) (3) (A)

(b) (3) (A). The firm is also currently licensed as an FDA Medicated Feed manufacturer. According to Mr. Bookey, NFC's SE Preventative Plans have been implemented universally at each egg production facility since July 2010; please refer to **Exhibits 1 through 18** for a copy of their SE plan.

FDA Egg Registration Numbers for the individual shell egg production sites inspected and covered in this report:

<u>NFC Farm name</u>	<u>Registration #</u>
Hilltop Farm	21548827716
Stanwood Farm	23648660382
Marysville Farm	22815844414
Yelm Farms (Farm 1 & 2)	23346620344
Lind Farm	28582822098

Other non-egg production sites operated by NFC are the firm's corporate office which includes warehousing and distribution for eggs and as a contract trucking distribution system, corporate laboratory located adjacent to the Marysville complex, Arlington, Washington; Feed Mills located in Arlington and Spokane, Washington; and additional brooding facilities located in Plankinton, South Dakota and Tenino, Washington. Since the previous inspections, two NFC farms have sustained damage from fires, Hilltop Farm (2008) and Marysville processing plant (2010).

Due to the Marysville 2010 fire, NFC is shipping table eggs produced by each of their western farms to the Lind Farm processing plant for grading, packing, and distribution. In addition shell eggs from these western farms are also being shipped to and processed by (b) (4)

(b) (4), subject to processing capacity of co-packers, market needs, and production schedules.

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All post inspectional correspondence regarding these inspections should be addressed to:

Mr. Brian V. Bookey, President  
National Food Corporation  
1930 Merrill Creek Parkway, Suite A  
Everett, Washington 98203-5897

**INTERSTATE COMMERCE / JURISDICTION (JRM)**

According to Mr. Bookey, NFC produces and packages eggs for a variety of private labels for local and national supermarket retailers. Prior to the 2010 fire of the Marysville processing facility, eggs from all the NFC western egg laying facilities were processed at the Marysville facility (Lind has their own processing operation). Processing consisted of washing, grading (AMS), packing, refrigerating, and holding for distribution and if needed Marysville had an egg breaking and treatment capability.

Currently, most of the shell eggs from NFC western farms are trucked to their Lind facility for processing, refer to **Exhibits 24 and 27**, for out going shipping records to Lind. Organic eggs produced at the Marysville Farm are trucked to an organic processing co-packer, such as (b) (4) (b) (4) for cleaning, grading, and packing. The eggs are then either trucked back to the Marysville facility for distribution or directly to other NFC distributors.

Mr. Bookey explained that NFC has approximately (b) (4) customers predominately located in (b) (4) (b) (4) NFC packs for (b) (4) (b) (4) (b) (4) Mr. Riofrio stated that there are other co-packers for NFC either due to the fire or on exchange and trading of eggs between regional egg corporations when they are long or short on supplies; these include competitors (b) (4) (b) (4)

Mr. Riofrio explained that pullets are supplied to the different farms from four NFC brooding locations. The current pullet brooding locations are Lind (for Lind only), Marysville (organic for Marysville only), Tenino, Washington, and Plankinton, South Dakota facility for all other lay house locations.

Hilltop received pullet chicks from (b) (4) Refer to **Exhibit 21, pages 1 through 3** for copies of NPIP Form 9.

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Stanwood received pullet chicks from (b) (4) Refer to **Exhibit 39** for a copy of NPIP Form 9.

Marysville received pullet chicks from (b) (4) Refer to **Exhibit 38, Pages 2,3,5, and 7** for copies of NPIP Form 9. These day old chicks are raised in pullet house # 9 until ready to be populated into the laying houses next in rotation.

Mr. Riofrio stated that (b) (4) % of the one-day-old chicks come from (b) (4)

Mr. Riofrio told us that feed for all western NFC farms is produced at the NFC Feed Mill located near the Marysville Farm operation. The source of the materials used to make this feed can be sourced from many locations.

NFC operates shell egg producing farms with greater than 50,000 laying hens per farm and therefore is subject to the 21 CFR part 118. The eggs and feed handled by NFC meet the definition of food under the Food, Drug, and Cosmetic Act and are subject to the provisions of the FD&C Act as well as the Public Health Service Act.

**INDIVIDUAL RESPONSIBILITY AND PERSONS INTERVIEWED (GTW/DLL)**

Brian V. Bookey, President  
Roger Deffner, Vice President  
Randy G. Hansey, Operations Manager  
Scott H. Vessel, Production Manager  
Roger L. Edwards, Safety Director  
Luis A. Riofrio, Food Safety & Quality Assurance Director

Mr. Bookey explained that the NFC Board of Directors are; Mr. Roger Deffner, Mr. Vince Bookey, Mr. Dean Fox, Mr. Shaun McCann, and himself. He stated that he is the most responsible individual for NFC. As President, Mr. Bookey has the ultimate responsibility for the firm; he has the knowledge, power and duty to detect, prevent and correct any problems at the firm. Each of the key personnel interviewed were observed to defer authority to Mr. Bookey. He has the ultimate authority to hire and fire personnel, however, he stated that he has also delegated this authority to the individual farm managers. He demonstrated knowledge and understanding about the firm, personnel, operations and products handled by NFC. He provided us with information at the beginning and close-out of this inspection. He assigned his key personnel to accompany us

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throughout the on-farm inspections and was available and present during much of the inspection. Mr. Bookey reports to the NFC Board of Directors, of which he is the Chairman.

According to Mr. Riofrio, he reports directly to Mr. Bookey. He is responsible for creating and implementing the NFC SE plan and general quality assurance (QA) issues at all NFC locations. He provided information on all aspects of the NFC Egg Rule Standard Operating Procedures (SOP) and Biosecurity plan. Mr. Riofrio was present at the onset of this inspection and participated in the inspections and sample collections at the following farms; Stanwood, Marysville, and Lind.

According to Mr. Vessel he reports directly to Mr. Bookey. He is responsible for the operational procedures at NFC locations. He provided information about the different farm sites including: population amounts, size and location. Mr. Vessel was present at the onset of this inspection and during the inspections and sample collections at the following farms: Hilltop, Yelm 1 & 2, and Lind.

According to Mr. Edwards he reports directly to Mr. Bookey. He is responsible for all safety concerns at each NFC location and is responsible for safety oversight during most FDA inspections. He provided information to us about the NFC laboratory operations and provided business information about the locations where he was an active participant. He was present at the onset of this inspection and during the inspections and sample collections at the following farms: Hilltop, and Yelm 1 & 2.

**FIRM'S TRAINING PROGRAM (DLL)**

Mr. Riofrio explained to us that employee training at the NFC locations that were visited during this assignment varied by each location. The primary source of training has come from on the job training and experiences for each employee. Management staff has reviewed their bio-security plan and determined what personnel protective equipment (PPE) was needed. All employees have been trained in Good Agricultural Practices (GAPs) as part of their employment. Mr. Riofrio stated that employee training is documented in each employee's personnel folder. The shell egg regulations (21 CFR 118) require that managers must have completed training in SE prevention measures equivalent to the FDA shell egg training program or through on the job experience. We observed evidence that the NFC management had received sufficient job experiences to meet this requirement.

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**MANUFACTURING/DESIGN OPERATIONS****Hilltop Farm - Hilltop (DLL)**

**Inspection Participants: FDA – Dirk L. Lincoln, Gordon T. Wales, and Scott W. Fox  
WSDA – Daniel J. Maxon, and Elaine M. Hagedorn**

**Inspection Dates: November 29, 2010 and December 1, 2010**

**Samples Collected: INV 647367 (96 subs)**

Mr. Barnaby (NMI) Cruz, Farm Manager, has the responsibility to operate and manage this facility; he provided some of the information found below. During our inspection and sample collection we were accompanied and assisted by Mr. Cruz, Mr. Vessel, and Mr. Edwards.

A vehicle sanitizing station is located in the driveway leading to this farm however it was not used during this inspection. Our vehicles were parked in the employee parking area and did not enter within firm's bio-security boundaries.

This site consists of (b) (4) houses, refer to **Exhibit 19** for a rodent control diagram marking glue and bait stations as well as the building orientation. The houses are each (b) (4) feet by (b) (4) feet. The hen houses are numbered 71 through 73. Two of the hen houses were populated with (b) (4) during this inspection but only house 71 had hens that were in production. House 71 had been populated April 19 – 22, 2010 with pullet chicks from (b) (4) (b) (4); Refer to **Exhibit 21** for copies of NPIP Form 9. House 72 had been recently populated with pullets that were about (b) (4) weeks old. The third house, number 73, is still under construction in the final stages of being built. When fully operational each house will be stocked with approximately (b) (4) traditional (b) (4). These houses are constructed to have (b) (4) rows with (b) (4) tiers per row. The houses have belted egg and manure handling systems. Feeding is accomplished with (b) (4) feeding system and water is delivered via (b) (4) system. Mr. Cruz explained that they have about (b) (4) hens per cage, daily mortality is (b) (4) – (b) (4) per day and carcasses are cremated on site. He told us that currently they produce about (b) (4) eggs per week and expects about (b) (4) eggs per week once all three houses are in production.

House 71 was inspected during this inspection. We observed that this house has (b) (4) rows, (b) (4) tiers high of caged hens. Each tier had a manure belt that ran the length of the row to the back of the house and dropped the manure down to a (b) (4) belt that then took the combined manure from all belts to the exterior of the building to the manure holding area. These manure belts are run (b) (4) times each day. We observed egg belts (b) (4) (b) (4) to a common egg belt that transported the eggs into the adjoining building. In this adjoining building the eggs were placed in re-usable plastic trays. An identifying card was used to indicate the source of these eggs and date of collection. The palletized eggs were placed in the on-site cooler to be held for shipping to the NFC processing plant or designated co-packer. Refer to **Exhibit 23** for the records of eggs being held for

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shipment during this inspection. Rodents are controlled by the use of b4 around the perimeter and b4 and b4 on the inside. Refer to **Exhibit 19** for a diagram indicating b4 locations. (b) (4) is rodent check b4. Flies are monitored with b4 located at both ends of the hen house.

There is space on the property for a fourth house. This site has a written SE Prevention Plan with environmental sampling and testing procedures. No SE positive samples have been documented at this location or in hens destined for this location; refer to **Exhibit 22** for SE test results for this farm and Stanwood.

**See Additional Information section - Attachment B: Hilltop Farm (FEI #3003961513), Pages 22 through 30**

**Stanwood Farm - Stanwood (TCM)**

**Inspection Participants: FDA – Thomas C. McLean, John W. Banks, and Jean R. McCurry  
WSDA – Lyndon M. Badcoe, and Julia K. Neil**

**Inspection Dates: November 29, 2010 and November 30, 2010**

**Samples Collected: INV 604000 through 604003 (40 subs)**

Mr. Michael E. West, Farm Manager, has the responsibility to operate and manage this facility. Mr. West provided most of the information found below. This farm is on a (b)(4) acre site, there are b4 wells that supply the on-site residence and the hen houses. We were accompanied and assisted in this inspection by Mr. West and Mr. Riofrio who also provided information including copies of released documents that we collected.

A vehicle sanitizing station is located on the driveway approaching this farm. This was a motorized hand wand spraying system used to sanitize each vehicles tires, wheel wells, and lower sides of the vehicles. This site consists of (b) (4) “shallow pit” houses. The houses are (b)(4) feet wide containing hen cage rows that are (b)(4) feet long with an additional (b)(4) feet at the end of each row. The space between each house is approximately (b)(4) feet. There is a three foot wide gravel barrier along the lengthwise side of each house and a cement connecting pathway at both ends. The houses are numbered 51 through 55. Houses 51 through 54 were covered during this inspection.

Prior to stocking these houses with new hens the structures were cleaned and disinfected in accordance with the NFC bio-security plan. Refer to **Exhibit 33**, which consists of records for the cleaning and disinfection process that was performed, starting on August 16, 2010, and prior to the current flock of hens being moved in September 4 – 11, 2010; move in is documented in **Exhibit 29**.

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Each house is stocked with approximately (b) (4) (b) (4). All of the houses at this location have hens of about the same age, which were approximately (b) (4) weeks old during this inspection. Refer to **Exhibit 29** for the move in records and **Exhibit 39** for the NPIP Form 9 record indicating that (b) (4) was their supplier.

Mr. West told us the hens at this location are molted b4 at approximately b4 of age. Inside each house there are (b) (4) rows of hen cages (b) (4) (b) (4). The rows along each exterior wall consist of b4 hen cages, which face the center of the house. The (b) (4) rows in the middle are (b) (4) (b) (4). Each row has (b) (4) tiers of cages with (b) (4). Manure (b) (4) falls into a "shallow pit". The pit was about b4 deep.

Manure is removed from each house on a rotating basis every (b) (4). The manure removal process starts with the shelf being scrapped toward the center and drops down to the pit below.

(b) (4)  
(b) (4) moves the manure to a waiting dump truck. Each house will generate (b) (4) dump truck loads per cleaning.

The hens are fed proprietary feed formulations made by the NFC feed mill located at a separate facility east of the b4 (b) (4) feed silo (b) (4) that holds (b) (4) pounds of feed that will last approximately (b) (4). Feed is moved (b) (4) (b) (4) into the feed trough (b) (4) per day. At this facility the hens started receiving a new b4 feed blend (formula (b) (4)) comprised of high levels of b4. The eggs will be marketed accordingly. The hens are given water from one of b4 onsite wells that also provide water to the adjacent farm house. Mr. West told us there is no treatment or testing of the water.

As eggs are laid, (b) (4) (b) (4). Eggs are hand picked (b) (4) day on a shift that runs from (b) (4). As the eggs are collected they are placed into plastic trays on a motorized cart, these trays are then moved into the holding cooler. A pink date tag, marked as "Stanwood", is placed on each pallet of collected eggs; refer to **Exhibit 25** for an example of one card. The eggs are stored in (b) (4) feet refrigerated building maintained at (b) (4) F. There is room in the building for (b) (4) pallets, or about (b) (4) holding capacity. Eggs are shipped within b4 hours of collection to the final grading and packaging plant, normally at the Marysville facility. Since the recent fire at the Marysville processing plant there are currently multiple locations these eggs may be sent to be packed, graded and stored under refrigeration; refer to **Exhibits 27 and 28** for documents showing the holding and movement of eggs out of this facility.

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Rodents are controlled by the use of b4 around the perimeter, and b4 and b4 on the inside of the houses. (b) (4) is rodent check b4 refer to Exhibits 30 and 31 for examples of the rodent monitoring records. Flies are monitored with (b) (4) located at the ends of the hen house; refer to the documents in Exhibit 32 for fly monitoring records. Mr. West told us he is responsible for the development of fly monitoring at all NFC farms and that (b) (4) is fly monitoring b4 for all NFC operations. Dead and or depopulated birds are sent to and rendered by (b) (4)

This site has a written SE Prevention Plan with environmental sampling and testing procedures. Mr. Riofrio and Mr. Bookey told us that no SE positives have been documented in the testing performed by NFC; refer to Exhibits 22 and 26 for the pullet SE test records for this farm and Hilltop.

**See Additional Information section - Attachment B: Stanwood Farm (FEI #3003959978), Pages 30 through 38**

**Marysville Farm - Marysville (TCM)**

**Inspection Participants: FDA – Thomas C. McLean, John W. Banks, and Jean R. McCurry  
WSDA – Daniel J. Maxon**

**Inspection Dates: December 6, 2010 and December 7, 2010**

**Samples Collected: INV 635818 through 635821 (24 subs)**

Mr. Cornelio (NMI) Guerra, Farm Manager, operates this facility and provided most of the information for the Marysville facility. This farm is located adjacent to the NFC processing plant and laboratory facility. The farm includes adjoining farm land also owned by NFC. The eggs produced at this site are brown shelled organic and are raised in a “cage free” manner. Refer to Exhibit 40, pages 1 and 2 for a diagram used for b4 that shows the general house layout, a more detailed description is found below. We were accompanied and assisted in this inspection by Mr. Guerra and Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director. Mr. Guerra and Mr. Riofrio suggested and assisted in using a method of (b) (4) at the back of the house where they were more accessible than at the front of the house.

A vehicle sanitizing station is located on the driveway approaching the hen houses. Only vehicles going past the processing facility to the hen houses are required to sanitize the vehicles tires and wheel wells. Our inspection team used only one vehicle inside their bio-security zone. This site consists of seven houses with each one measuring (b) (4) feet by (b) (4) feet and approximately (b) (4) feet apart from each other. The houses are numbered/identified 4 through 10. Houses 1 through 3 were west of the current group of houses but no longer exist. A house numbered 11 burned down several years ago and NFC has no plans rebuild (a cement slab remains). House number eight is the pullet house. Between houses numbered five and six there is a covered manure holding pen. This cement

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walled and floor area can hold (b) (4) manure collected from the houses on this site. We noted that the gravel barrier along the length of each building was still being applied. Surface water flows in a north to south direction along the houses and empties into an open culvert along the south property line.

The on-site pullet house (number 8) raises all of the birds needed for this operation, starting with day old chicks. These chicks were last obtained from (b) (4) For copies of receipts and the NPIP form 9's refer to **Exhibit 38, pages 2, 3, 5, and 7**. This pullet house contained (b) (4) pullets. These pullets will be used to restock two houses when they mature. The pullets are (b) (4) They were acquired from (b) (4) at the age of one day old. There are b4 pullet cycles per year. Each laying house is stocked with approximately (b) (4) We did not conduct an inspection of this house. **Exhibit 38, pages 1, 4, and 6** consist of chick history and vaccination records for these pullets.

At this location there are usually two houses with the same age birds. At the time of this inspection, the ages were:

(b) (4)

We inspected houses in the following order, youngest to oldest (this pullet house was not inspected); (b) (4). The hens in these houses are (b) (4)

These houses are divided into (b) (4) sections, (b) (4) (b) (4) where the feed, water, and nesting are located along with most of the hens. Most of the eggs are laid (b) (4) and then removed using an egg belt that delivers the eggs to (b) (4) (b) (4) section is a "scratch" area that is at ground level and covered with approximately three to four inch layer of wood chips/sawdust. The hens have access to the scratch area and will make nests where they also lay eggs. The eggs laid in this section are b4

During warmer months, the hens have access to an outdoor penned area located between hen houses. The outside area is located between the houses and is shared by the adjacent house with a chain link fence dividing the pens lengthwise. The hens for each house are contained and kept separate. These birds have the potential to come into contact with wild birds while outdoors. We observed numerous pigeons and seagulls on the house roofs. The exterior access doors were closed and no hens were observed in the outside pens during this inspection.

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These hens are fed and organic feed that is held in a silo on (b) (4)  
(b) (4) The feed is mechanically moved directly to the feeders in the center section of each house. The information about the feed components used by the farm was not provided, other than Mr. Riofrio and Mr. Guerra stated that the feed is organic.

Daily, (b) (4) the eggs are collected from the end of the egg belt and placed into plastic trays and palletized. In the scratch area any eggs laid in this area are (b) (4)  
(b) (4) After collection the eggs are tagged with a pink card marked as originating at the Marysville facility and dated with the collection date; refer to **Exhibit 36**, for an example of this card. The eggs are then moved to an on-site cooler and held for processing and shipping (this product cooler was not involved with the recent fire). Since the fire in the processing plant the eggs from this farm go different directions depending upon which co-packer can process their eggs. Currently (b) (4) per week eggs are sent to (b) (4) for processing, packing and distribution. (b) (4)  
(b) (4) may also be recipients of eggs to be processed

Under the raised sections of the houses there is (b) (4)  
(b) (4)  
(b) (4) moves the collected manure to the exterior of the building where it falls into a motorized dumpster that hauls the manure to the manure shed (located between houses five and six).

NFC is limited in the methods of control they may use for pest control due to their organic classification. The exterior of the houses have (b) (4) for rodent control. Inside the houses are limited to (b) (4) **Exhibit 41, pages 9 and 10**, depict the location of exterior (b) (4) and interior (b) (4) NFC relies on efficient and complete (b) (4) removal of manure to control fly population. The manure exterior (b) (4) is completely sealed from potential entry of flies. Flies are monitored with (b) (4) refer to **Exhibit 40, pages 1 and 2** for the diagram showing placement of cards and **Exhibit 40, pages 3 through 6** for fly index reports.

This site has a written SE Prevention Plan with environmental sampling and testing procedures. According to Mr. Bookey and Mr. Riofrio no SE positives have been documented in the testing performed by NFC, refer to **Exhibit 42** for the results of SE testing at this location, they are negative at 14 and 40 – 41 weeks.

**See Additional Information section - Attachment B: Marysville Farm (FEI # 3007670421), Pages 39 through 47**

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**Yelm Farms 1 & 2 – Yelm 1 & 2 (DLL)**

Mr. Houston A. Thompson, Farm Manager, and Ms. Carol Thompson, Production Manager, operate this facility and provided some of the information for these Yelm 1 & 2 Farms. We were accompanied and assisted in this inspection by Mr. Thompson, Mr. Scott H. Vessel, Production Manager and Mr. Roger L. Edwards, Safety Director.

This site is comprised of two co-located farms, Yelm 1 Farm and Yelm 2 Farm. A vehicle sanitizing station is required to be passed through for visits to both farms. The sanitizing station consisted of a pumping station with a hand held spray wand used to sanitize the vehicles tires and wheel wells.

Rodents are controlled by the use of [redacted] around the external (outside) perimeter, and [redacted] on the inside. (b) (4) is rodent check [redacted] Flies are monitored with [redacted] There are (b) (4) cards per house mounted vertically and located at both ends of the hen (b) (4)

In general, eggs are collected (b) (4) and cooled overnight in a refrigerator at approximately 45° F prior to being transported to a grading, packing and/or breaking facility. Eggs from separate houses are not commingled; refer to **Exhibit 46** for the color pallet tags used to mark each pallet of eggs from each house. Diverted eggs (if necessary) are segregated and identified by pallet and kept apart from non-diverted eggs within the same cooler. Diverted eggs are shipped unprocessed to a breaker facility. Not all of the eggs from these farms are USDA graded; however some customers require USDA grading. Packing and grading takes place at one of the NFC processing facilities or at a contract processor.

These farms have a written SE Prevention Plan with environmental sampling and testing procedures. According to Mr. Bookey and Mr. Riofrio no SE positives have been documented. **Exhibits 20 and 34** depict dates of pullet swab collection but no results were provided.

**Yelm 1:**

**Inspection Participants: FDA – Dirk L. Lincoln, Gordon T. Wales, and Scott W. Fox  
WSDA – Lyndon M. Badcoe, and Julie A. Walker**

**Inspection Dates: December 6 and 7, 2010**

**Samples Collected: INV 647368 and 647369 (160 subs)**

Yelm 1 consists of three houses, numbered 61, 62, and 63; refer to **Exhibit 43** for a house layout and bait station location diagram. The (b) (4) cage system is designed to fit (b) (4) (b) (4). Each house consists of (b) (4) rows with varying heights from (b) (4) tiers (b) (4) (b) (4) to a pair of (b) (4) tiers in the middle; refer to **Exhibit 44**.

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All houses are stocked with (b) (4) hens. House 61 has hens that are (b) (4) (b) (4) are (b) (4) weeks old. Hens are fed a (b) (4) mixture with (b) (4) feeding system and well water is provided through (b) (4).

(b) (4) egg belt to move eggs to the front of the house. The eggs are conveyed by egg belt to a central collection site between house 61 and 62; refer to **Exhibit 43**. The eggs are placed into plastic trays, palletized, and a color coded card is used to identify each pallets source and date. These eggs are moved to the on-site cooler and held for shipping to the NFC Lind Farm, which is currently designated to process eggs from houses 61 and 62. The eggs from house 63 are collected each day and packed to go to a breaking operation since eggs from (b) (4) old hens are generally larger and more fragile than eggs from younger birds. (b) (4)  
(b) (4)

Each tier for each row has (b) (4) (b) (4) (b) (4) a day (b) (4) the manure belts are, run delivering the manure to the back of the house, where it drops down to a (b) (4) and then takes manure outside to an exterior covered pit. Collected manure from this pit is spread on acreage surrounding this complex of farms.

**Yelm 2:**

**Inspection Participants: FDA – Dirk L. Lincoln, Gordon T. Wales, Scott W. Fox, and Katherine L. Ernest**

**WSDA – Lyndon M. Badcoe, and Julie A. Walker**

**Inspection Date: December 9, 2010**

**Samples Collected: INV 647370 and 647371 (48 subs)**

Yelm 2 consists of four houses numbered 64, 65, 66, and 67. They are (b) (4) with (b) (4) rows and (b) (4) tiers per row; refer to **Exhibit 45** for a diagram of rows and tiers. The houses are stocked with (b) (4) hens ranging from (b) (4) old to (b) (4) old. Feed is distributed manually and consist of a (b) (4) product. Well water is distributed through (b) (4). Eggs are collected and handled similarly to Yelm 1.

Manure is removed by (b) (4) (b) (4) The manure from each house is initially dumped into an external open air pit. Manure is subsequently hauled away by truck.

**See Additional Information section - Attachment B: Yelm Farms (FEI # 3003961433), Pages 47 through 55**

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**Lind Farm - Lind (DLL)**

**Inspection Participants: FDA – Dirk L. Lincoln, Gordon T. Wales, and  
Katherine L. Ernest**

**WSDA – Walter R. Strong, and Julie A. Walker**

**Inspection Date: December 13 and 14, 2010**

**Samples Collected: INV 647372 through 647375 (48 subs)**

Mr. Larry Wippert, Farm Manager, and Ms. Adriana Wippert, Pest Management, operate this facility and provided most of the information for in this report. We were accompanied and assisted in this inspection by Mr. Wippert, Mr. Scott H. Vessel, Production Manager, and Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director, on both days of this inspection; Mr. Bookey was present on the first day.

A vehicle sanitizing station is located on the driveway just outside of the gated entry to the back of the farm. It is accessed from the parking lot near the office. The sanitizing station consisted of a pumping station with a hand held spray wand used to sanitize the vehicles tires and wheel wells. One FDA vehicle was taken into the bio-security zone. Only the manure pits were inspected and swabbed, we did not visit the top side where the hens are housed.

This site consists of ten laying houses numbered one through ten and four pullet houses. The pullet houses at this location raises and provides all of the birds needed for this operation. The pullets are (b) (4) they were acquired from (b) (4) (b) (4) at the age of one day old chicks. There are (b) (4) pullet cycles per year. These pullet houses will be used to restock (b) (4) laying houses when they reach laying maturity.

A (b) (4) feed is conveyed to the cages by (b) (4) Feed is obtained from a mill located in (b) (4) Well water is distributed to the hens through (b) (4) system in each of the houses.

Eggs belts collect the eggs daily and convey them to the processing area. The eggs are cleaned, graded and packed for delivery to customers. Eggs from separate houses are not blended. After processing and packing, the eggs are held refrigerated for distribution in a warehouse. Not all of the eggs are USDA graded; however some customers require USDA grading.

Eggs diverted for any reason are segregated and identified by pallet and kept apart from non-diverted eggs, but within the same cooler. These diverted eggs are shipped unprocessed to a breaker facility. There is no breaker facility at this location. Since the fire at the Marysville processing plant breaker eggs are sent to (b) (4)

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Rodents are controlled by the use of b4 around the perimeter, and b4 and b4 on the inside. (b) (4) is rodent check b4 Flies are monitored with b4 located at (b) (4) Monitoring records from August 11, 2010 through December 8, 2010 are contained in **Exhibit 47**.

Each laying house has (b) (4) rows with a manure pit (b) (4) (b) (4) allowed to drop down through the center falling beneath the caged hens above to the deep pits below. Each house has a manure pit below; manure is removed from the pits (b) (4) using a (b) (4) The manure is trucked offsite. The (b) (4) used for cleaning the pits are common to all of the houses.

This farm has a written SE Prevention Plan with environmental sampling and testing procedures. Mr. Riofrio and Mr. Bookey told us that the only SE positive results documented for this farm were during the previous FDA outbreak trace back and multi site NFC inspection; the inspection concluded on March 20, 2003. Subsequent to finding SE positive samples at this facility egg sampling was performed multiple times until cleared for shell egg distribution.

**See Additional Information section - Attachment B: Lind Farm (FEI # 3003961518), Pages 56 through 64**

**MANUFACTURING CODES (DLL)**

There are no specific codes placed on the items that were produced during this inspection. However, each farm places a color coded tag on the outside of each pallet of eggs. The tag is used by the packing house to provide a tracking system for each shipment of eggs; refer to **Exhibits 25, 36, and 46** for examples of the cards in-use during this inspection.

When these eggs are processed the processing plant is usually operating under USDA jurisdiction. The USDA grading is voluntary and is performed under the Agricultural Marketing Service (AMS). If USDA graded, the package receives a USDA seal and a "P" number, which is a number assigned by USDA indicating the firm is a poultry processor. When eggs are broken and processed as liquid eggs or egg products (usually pasteurized) this processing is performed under continuous USDA inspection and these plants also have a "P" number. The "P" number is stamped or printed on any USDA inspected poultry products that are distributed as a USDA product.

NFC "P" numbers: Lind - P-1747 (processing)  
Marysville - P-1264 (breaking)  
Marysville - P-1264A (processing)

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**COMPLAINTS/ RECALL PROCEDURES (DLL)**

According to Mr. Riofrio, complaints are handled by their corporate office located in Everett, Washington, he told us the firm has not had a complaint for the last few years. Based on the information obtained in FACTS there have been no filed complaints against this firm. Mr. Bookey told us NFC management would handle all recalls. NFC has a formal recall policy and conducts mock recalls (b) (4)

**REFUSALS (DLL)**

We did not encounter any refusals during any of these inspections.

**GENERAL DISCUSSION WITH MANAGEMENT (KLE)**

On December 16, 2010, CSO's Lincoln, McLean, and SCSO Wright discussed the following ten observations that were not listed on a Form FDA 483, Inspectional Observations, with Mr. Bookey, Mr. Deffner, Mr. Riofrio, Mr. Edwards, Mr. Vessel, and Mr. Hansey.

1) Flies – Moderate level of fly activity was observed inside of laying houses at the Stanwood, Yelm 2 and Lind facilities; refer to **Exhibits 32 and 47**. Specifically, at Stanwood, fly activity was observed in greater numbers surrounding the (b) (4) and at openings to the exterior where the (b) (4) exits the laying house. At Yelm 2, fly activity was observed in greater numbers towards the middle of the houses. At Lind, minimal fly activity was observed within the manure pit at house number four, however, houses with older flocks had more manure present and greater fly activity observed. CSOs McLean and Lincoln discussed the firm's current measures of placing fly (b) (4) at the front and back (ends) of each house and suggested that placing (b) (4) along the sides within each house may be more representative of fly activity. NFC's management agreed to reconsider placement of fly (b) (4)

Mr. Bookey stated that it is difficult to manage flies within deep pits. He stated that for fly management the firm's belted houses, such as Hilltop, are superior. He stated that he was (b) (4) (b) (4) Investigator Lincoln discussed that the farm manager in Lind had stated the manure may have been (b) (4) Mr. Bookey agreed that NFC's (b) (4) system within deep pit houses reduces the fly larvae population.

2) Wild birds – At the Marysville (organic facility) wild birds were observed on the roof of laying houses and the potential for interaction with hens in outdoor access areas at Marysville facility.

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Wild birds were observed in a nearby pond adjacent to Yelm 2. Specifically, at Marysville Farm, Investigator McLean stated that no less than 200 pigeons and seagulls were observed roosting on the rooftop of laying houses. Investigator McLean explained the potential for wild birds to interact with chickens in the outdoor access area. SCSO Wright explained if wild birds were observed interacting with the hens that are allowed into the caged area connected to the hen house, there may be a potential for SE to be communicable through this avenue of interaction. CSO McLean also discussed the potential for birds to roost at the cupola and bird excreta to enter into the house through the cupola.

Mr. Bookey stated that the firm had noticed increased wild bird activity after the recent fire at this farm and that the farm has kept feed spills to a minimum. Mr. Bookey agreed that the potential for interaction with wild birds is the biggest challenge about organic growing operations. Mr. Bookey agreed to discuss solutions with WSDA Daniel Maxson after this inspection. Mr. Vessel stated that there are screens inside the cupola and Mr. Bookey stated that wild birds cannot enter the house through the cupola.

3) Rodents – Live and dead mice, low activity, was observed inside the laying houses at Marysville and Yelm 1. Specifically, at Marysville three live mice were observed around the (b) (4). At Yelm 1, one dead mouse was observed inside of a (b) (4) which was within the actionable levels as defined by NFC's pest control monitoring protocol. Mr. Bookey stated that as an organic facility, Marysville is a challenge and that the firm has limited measures that they can take, however, they are controlling rodent activity to the extent possible under the constraints of the rules and regulations for organic status of this farm.

4) Pest Access - Unscreened openings leading to the outside were observed in laying houses at Stanwood and Yelm 2. Specifically, at Stanwood an approximately one foot square unscreened opening surrounding (b) (4) was observed, during pressure differentials a sliding door that moves off its rail/threshold in the hen house resulting in an unscreened two inch gap, and an unscreened two inch diameter hole on one hen access door was observed. At Yelm 2, an unscreened ridgeline along the roof, unscreened smaller rust holes in flashing along the wall, and unscreened air vents on the sides of the houses were observed. Mr. Bookey stated that Yelm 2 was constructed over 35 years ago, however, the firm's management agreed to address each item observed.

5) Records – Recordkeeping practices were discussed with the firm's management. Specifically, at the Hilltop, Yelm 1 and 2, and Lind, "white-out" was observed to have been used on records to make corrections; refer to **Exhibits 23, page 1, 24, page 2 and 3, 47, pages 1, 4, 5 and 8** for examples. SCSO Wright explained that records should reflect raw data and that if a mistake was made on a record the mistake should be lined out and initialed instead of erased entirely. At Hilltop, CSO Lincoln observed that corrective actions were written in Spanish, without English translation. He also discussed that records at each farm did not include initials and dates by the firm's official reviewer as well as the name and address of the farm where the records were created; refer to **Exhibit 47**. The firm's management agreed to address each item observed.

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6) Shared equipment – Shared equipment was observed being used between houses at Yelm 2 and Lind. Specifically, at Yelm 2, CSO Lincoln noted that the egg cart wheels may need closer attention such as sanitizing when used between the four hen houses that are connected by an internal walkway. At Lind, CSO Lincoln discussed cleaning and sanitizing before using the (b) (4) (b) (4) between each hen house when used to turn the manure. No cleaning and sanitizing records for these (b) (4) are currently being maintained.

Mr. Bookey explained that each of the four houses at Yelm 2 have flocks that are the same age and that the firm manages this farm as one flock. Mr. Bookey stated that any positive environmental samples would implicate all four hen houses. Mr. Bookey asked whether 21 CFR 118 defines a house. Mr. Deffner explained that Yelm 2 is like a (b) (4) bedroom house that is under one roof. Mr. Bookey agreed that, regarding documentation of (b) (4) cleaning and sanitation, the effectiveness of cleaning and sanitizing the (b) (4) are questionable if they do not maintain records.

7) Exterior contaminants – A green slush material was observed on the cement outside of the laying houses at Stanwood. Mr. Deffner identified the material as feed residue and stated that the residue is cleaned up (b) (4) per week. The firm's management promised to clean the area more often to prevent this from being a pest attractant.

8) Manure Management – The manure under the Marysville houses feeding and laying deck appeared to be more liquid/fluid. CSO McLean asked if there may be a water leak in those specific houses. Mr. Bookey explained that increased water is the result of the (b) (4) (b) (4) chickens that play with water (b) (4) more often than other breeds.

9) Egg Temperature – Egg transport trailer temperatures were observed to be recorded above 45° F at Hilltop; refer to **Exhibit 24, pages 1 and 3**. Mr. Riofrio explained that drivers are generally conservative in temperature settings so that the eggs do not freeze. Mr. Bookey stated that the trailers are never set above 45 °F. Mr. Bookey explained that every plant has a receiving log where employees record the temperature of the incoming trailer. He agreed that the firm failed to investigate the cause of this deviation; however, the transportation of breaker and table eggs in these trailers does not exceed (b) (4) hours. Mr. Riofrio explained that they will consider using (b) (4) (b) (4) to document the internal temperature of the trailers or data logger to document the temperatures in the future to demonstrate that the trailers do not exceed critical temperatures and/or non-refrigeration limits during handling. Mr. Bookey explained that investigations and corrective actions for such deviations will be fully documented in the future.

10) SE Plan – Portions of the NFC's SE prevention plan lacked site specific elements, such as the general Bio-security requirements which apply to all NFC farms. Mr. Riofrio explained that the firm's SE plan was officially implemented/revised on July 09, 2010, with farm specific elements. However, some general elements are shared and implemented uniformly throughout all NFC operated poultry farms. We identified that the SE Prevention Plan was not signed with the complete signature (not initials) and dated by the approving official or Administrator of the plan, for each farm, signifying the date the plan was initiated at each farm. Mr. Bookey signed the NFC general

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SE prevention plan on December 16, 2010 with a statement describing that the firm adopted the plan on July 9, 2010. He provided us with a copy of this statement, found in **Exhibit 48**.

**ADDITIONAL INFORMATION (DLL & TCM)**

**Attachment B: Hilltop Farm (FEI # 3003961513)**

**b5 & b7e**

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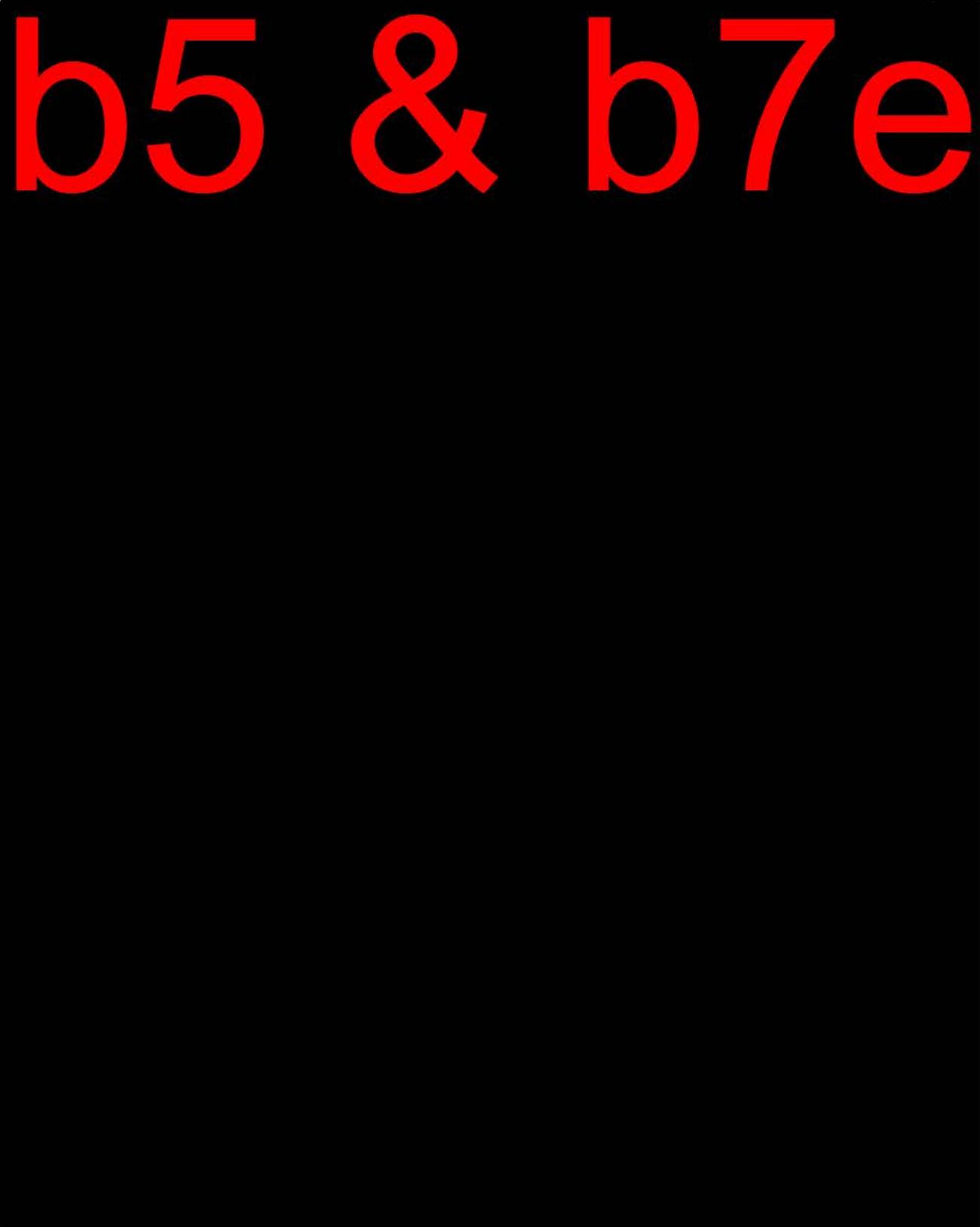
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**Attachment B: Stanwood Farm (FEI # 3003959978)**

**b5 & b7e**

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**Attachment B: Marysville Farm (FEI # 3007670421)**

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Everett, WA 98203-5897

FEI:

**3003622898**

EI Start:

11/29/2010

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12/16/2010

**b5 & b7e**

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**Attachment B: Yelm Farms 1 & 2 (FEI # 3003961433)**

**b5 & b7e**

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**Attachment B: Lind Farm (FEI # 3003961518)**

**b5 & b7e**



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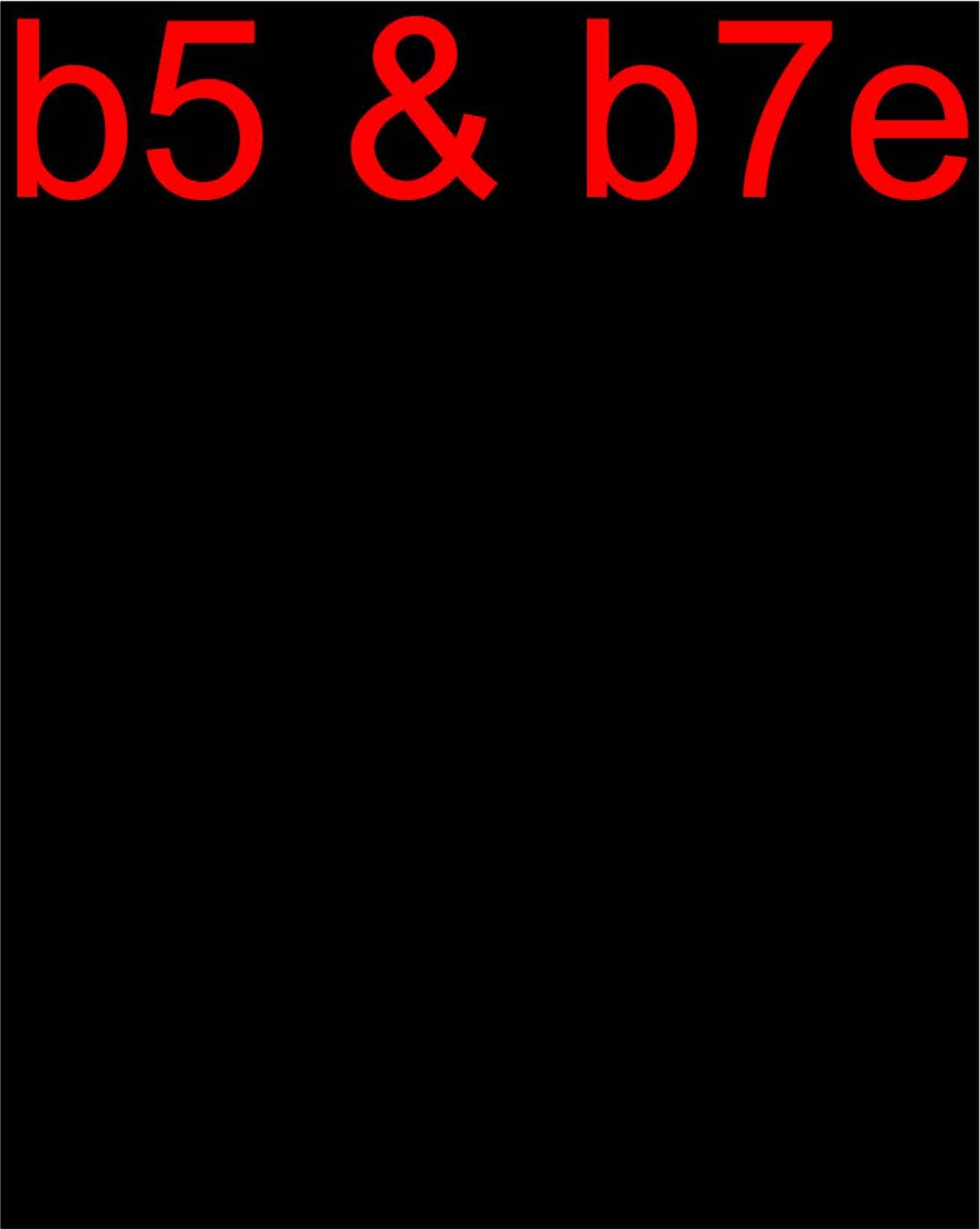
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**SAMPLES COLLECTED (GTW)**

During these current inspections, the following Environmental Samples were collected:

**Hilltop Farm**

INV647367 – 96 swabs of manure from house 71

**Stanwood Farm**

INV604000 – 10 swabs of manure from house 51

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INV604001 – 10 swabs of manure from house 52  
INV604002 – 10 swabs of manure from house 53  
INV604003 – 10 swabs of manure from house 54

Marysville Farm

INV635818 – 6 swabs of manure from house 7  
INV635819 – 6 swabs of manure from house 9  
INV635820 – 6 swabs of manure from house 4  
INV635821 – 6 swabs of manure from house 6

Yelm Farm 1

INV647368 – 80 swabs of manure from house 61  
INV647369 – 80 swabs of manure from house 62

Yelm Farm 2

INV647370 – 24 swabs of manure from house 65  
INV647371 – 24 swabs of manure from house 67

Lind Farm

INV647372 – 12 swabs of manure pit from house 4  
INV647373 – 12 swabs of manure pit from house 8  
INV647374 – 12 swabs of manure pit from house 3  
INV647375 – 12 swabs of manure pit from house 1

**EXHIBITS COLLECTED (DLL)**

NFC Headquarters

- Exhibit 1:** On farm audit document (2 pages)
- Exhibit 2:** NFC SE Prevention Program (10 pages)
- Exhibit 3:** NFC Ownership of Farm and Domestic Fowl (1 page)
- Exhibit 4:** NFC Egg Sampling Plan (1 page)
- Exhibit 5:** NFC Fly Management Program (3 pages)
- Exhibit 6:** NFC Rodent Management Program (4 pages)
- Exhibit 7:** NFC Environmental Sampling of Poultry Houses (5 pages)

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**Exhibit 8:** NFC Plankinton, Plankinton Layer, Heichels, Yelm, and Lind Pullet Swabbing Procedure (2 pages)

**Exhibit 9:** NFC Arlington, Yelm and Stanwood Swabbing Procedure (2 pages)

**Exhibit 10:** NFC Lind Swabbing Procedure (2 pages)

**Exhibit 11:** NFC Marysville and Tenino Swabbing Procedure (2 pages)

**Exhibit 12:** NFC Farm Listing (1 page)

**Exhibit 13:** NFC Feed Truck Delivery sheet (1 page)

**Exhibit 14:** NFC Fly Level Index (1 page)

**Exhibit 15:** NFC Divert Pallet Tag (1 page)

**Exhibit 16:** NFC Farm Daily Disinfection and Security Sheet (1 page)

**Exhibit 17:** NFC Visitors Log (1 page)

**Exhibit 18:** NFC Rodent Management Plan (5 pages)

Hilltop Farm

**Exhibit 19:** Hilltop Farm Layout (1 page)

**Exhibit 20:** Hilltop Farm Plankinton Pullet Swab Dates (2 pages)

**Exhibit 21:** Hilltop Farm VS 9-3 Reports (3 pages)

**Exhibit 22:** Hilltop Farm SE testing page (1 page)

**Exhibit 23:** Hilltop Farm Inventory (3 pages)

**Exhibit 24:** Hilltop Farm Outgoing Records (3 pages)

Stanwood Farm

**Exhibit 25:** Stanwood Farm House Tags (1 page)

**Exhibit 26:** Stanwood Farm SE testing page (1 page)

**Exhibit 27:** Stanwood Farm Outgoing Records (2 pages)

**Exhibit 28:** Stanwood Farm Inventory Record (2 pages)

**Exhibit 29:** Stanwood Farm Animal Husbandry Guidelines

**Exhibit 30:** Stanwood Farm Pest Control Operation Report

**Exhibit 31:** Stanwood Farm Pest and Vermin Control Log

**Exhibit 32:** Stanwood Farm Fly Index report

**Exhibit 33:** Stanwood Farm Cleaning and Disinfection Report

**Exhibit 34:** Stanwood Farm Plankinton Pullet Swab Dates

Marysville Farm

**Exhibit 35:** Marysville Farm photo disk (Photos not used)

**Exhibit 36:** Marysville Farm House Tags (1 page)

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- Exhibit 37:** Marysville Farm Inventory Record
- Exhibit 38:** Marysville Farm Organic Brood Planner
- Exhibit 39:** Marysville Farm VS 9-3 Reports
- Exhibit 40:** Marysville Farm Fly Index report
- Exhibit 41:** Marysville Farm Pest Control Operation Report
- Exhibit 42:** Marysville Farm Plankinton Pullet Swab Dates

Yelm Farms #1 and #2

- Exhibit 43:** Yelm Farm #1 layout (1 page)
- Exhibit 44:** Yelm Farm #1 House Description (1 page)
- Exhibit 45:** Yelm Farm #2 House Description (1 page)
- Exhibit 46:** Yelm Farm #1 House Tags (1 page)

Lind Farm

- Exhibit 47:** Lind Farm Fly Index report (18 pages)

NFC Headquarters (12/16/10)

- Exhibit 48:** NFC signature page for Bio-security plan

**ATTACHMENTS (DLL)**

Form FDA 482, Notice of Inspection, issued to Mr. Brian V. Bookey, President, dated 11/29/10, for Initial NFC Head Quarters

Form FDA 482, Notice of Inspection, issued to Mr. Roger L. Edwards, Safety Director, dated 11/29/10, for Hilltop Farm

Form FDA 482, Notice of Inspection, issued to Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director, dated 11/29/10, for Stanwood Farm

Form FDA 482, Notice of Inspection, issued to Mr. Roger L. Edwards, Safety Director, dated 11/30/10, for Marysville Lab

Form FDA 482, Notice of Inspection, issued to Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director, dated 12/6/10, for Marysville Farm

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Form FDA 482, Notice of Inspection, issued to Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director, dated 12/6/10, for Marysville Lab

Form FDA 482, Notice of Inspection, issued to Mr. Roger L. Edwards, Safety Director, dated 12/6/10, for Yelm 1 & 2 Farms

Form FDA 482, Notice of Inspection, issued to Mr. Roger L. Edwards, Safety Director, dated 12/9/10, for Yelm 2 Farm (new Investigator added)

Form FDA 482, Notice of Inspection, issued to Mr. Luis A. Riofrio, Food Safety & Quality Assurance Director, dated 12/13/10, for Lind Farm

Form FDA 482, Notice of Inspection, issued to Mr. Brian V. Bookey, President, dated 12/16/10, for NFC HQ close-out

Form FDA 484, Receipt for Samples, Issued to Mr. Brian V. Bookey, President, Dated 12/1/10 (Hilltop Farm, Sample # 647367)

Form FDA 484, Receipt for Samples, Issued to Mr. Brian V. Bookey, President, Dated 12/6/10 (Stanwood Farm, Samples # 604000-604003)

Form FDA 484, Receipt for Samples, Issued to Mr. Brian V. Bookey, President, Dated 12/6/10 (Marysville Farm, Samples # 635818-635821)

Form FDA 484, Receipt for Samples, Issued to Mr. Brian V. Bookey, President, Dated 12/7/10 (Yelm Farm 1, Samples # 647368-647369)

Form FDA 484, Receipt for Samples, Issued to Mr. Brian V. Bookey, President, Dated 12/9/10 (Yelm Farm 2, Samples # 647370-647371)

Form FDA 484, Receipt for Samples, Issued to Mr. Brian V. Bookey, President, Dated 12/14/10 (Lind Farm, Samples # 647372-647375)

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**FMD 145**

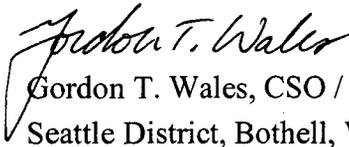
Mr. Brian V. Bookey, President  
National Food Corporation  
1930 Merrill Creek Parkway, Suite A  
Everett, Washington 98203-5897



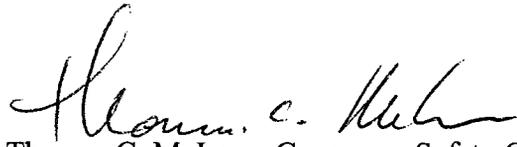
Dirk L. Lincoln, CSO / Investigator  
Seattle District, Spokane, Washington



John W. Banks, Investigator  
Seattle District, Boise, Idaho



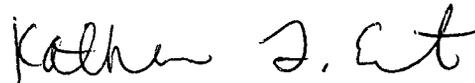
Gordon T. Wales, CSO / Investigator  
Seattle District, Bothell, Washington



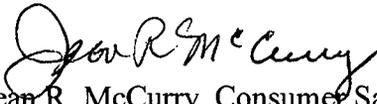
Thomas C. McLean, Consumer Safety Officer  
Seattle District, Bothell, Washington



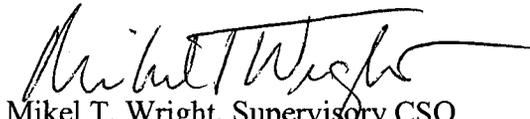
Scott W. Fox, Consumer Safety Officer  
Seattle District, Bothell, Washington



Katherine L. Ernest, Investigator  
Seattle District, Bothell, Washington



Jean R. McCurry, Consumer Safety Officer  
Seattle District, Bothell, Washington



Mikel T. Wright, Supervisory CSO  
Seattle District, Tacoma, Washington