

INVESTIGATION REPORT COVER SHEET

INVESTIGATION NAME: Fazolli_E.coliO145_Lettuce		ASSIGNMENT DATE: 12/11/2012
ERU LEAD: Nicole Zugsmith		
FIRM NAME: Shiffrar Farms		
ADDRESS: 21-27 Bailey Avenue	CITY: Lompoc	ZIP CODE: 93436
FIRM CONTACT: Richard Shiffrar	POSITION: owner	PHONE: 805-929-8045
E-MAIL ADDRESS:	FAX:	CELL PHONE: [REDACTED]
REPORTING PERSON:	AGENCY: FDA CORE	PHONE:
ACTIVITY: <input checked="" type="checkbox"/> OUTBREAK INVESTIGATION <input type="checkbox"/> PRODUCT CONTAMINATION INVESTIGATION <input type="checkbox"/> PFR ENVIRONMENTAL <input type="checkbox"/> RETAIL ENVIRONMENTAL <input checked="" type="checkbox"/> TRACEBACK INVESTIGATION <input type="checkbox"/> TAMPERING <input type="checkbox"/> COMPLAINT <input type="checkbox"/> SAMPLING <input type="checkbox"/> TECHNICAL ASSISTANCE <input type="checkbox"/> OTHER:		
ERU ELECTRONIC FILE LOCATION: J:\ERU\Investigations\Investigations 2012\FazolliN_Romaine_EcoliO145_113012		
ATTACHMENTS: Attachment 1: Incident Action Summary (10 pages) Attachment 2: General Farm Questionnaire w/attachments (26 pages)		

ENFORCEMENT ACTIONS: <input type="checkbox"/> NOV ISSUED <input type="checkbox"/> EMBARGO <input type="checkbox"/> VC & D <input type="checkbox"/> REG. LETTER <input type="checkbox"/> REFERRAL <input type="checkbox"/> OTHER:		
RECOMMENDATIONS: <input checked="" type="checkbox"/> NAI <input type="checkbox"/> MINOR VIOLATIONS / FIRM CORRECTING <input type="checkbox"/> OTHER:		
COMMENTS / FOLLOW-UP ACTION: Field 9NA-12 was planted with broccoli at the time of this investigation. The field investigation did not result in any significant findings regarding recent weather conditions, water usage, soil amendments, pesticide use, or animal intrusion. During this investigation, significant conditions were not observed at Shiffrar Farms 9NA-12 that could have related to product contamination with <i>E. coli</i> during the growing and harvesting time period.		
ERU LEAD SIGNATURE: Nicole Zugsmith	INV.# 054	REPORT DATE: 3/11/2013
SUPERVISOR SIGNATURE: Michael D. Needham #094	[REDACTED]	DATE REVIEWED: 3/12/2013
SUPERVISOR DISPOSITION: [REDACTED]	NAI	

Fazolis_40/60Romaine/Iceberg_E.coliO145_113012

Incident Action Summary

Date Initiated: 11/30/2012

X	Form
	ICS 204
	ICS 205
	ICS 206/208
	ICS 214
	Map/Chart
	Weather/Forecast
	Other

Approved by: Mike Needham, FDB, Incident Command

Approved by:

1. Incident Name: FreshwayFoods_40/60Romaine/Iceberg_E.coliO145_113012	2. Incident Number:	3. Date/Time Initiated: Date: 11/30/2012 Time: 0800
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Incident Action Plan (ICS 201)

4. Firm Information:

Firm Name	Address	City	State	County	Zip	Lat / Long
Sunterra Produce • Shiffar Farm • San Ysidro Farms	696 N. 8 th Street	Brawley	CA	Imperial		36°54'7.45"N 121°26'54.32"W 36°54'7.45"N 121°26'54.32"W
Contact	Position	Phone				
Garret Fargo garret@sunterraonline.com	Food Safety	760-344-9600				
Vince Vioria vince@sunterraonline.com		760-344-9600				

Firm Name	Address	City	State	County	Zip	Lat / Long

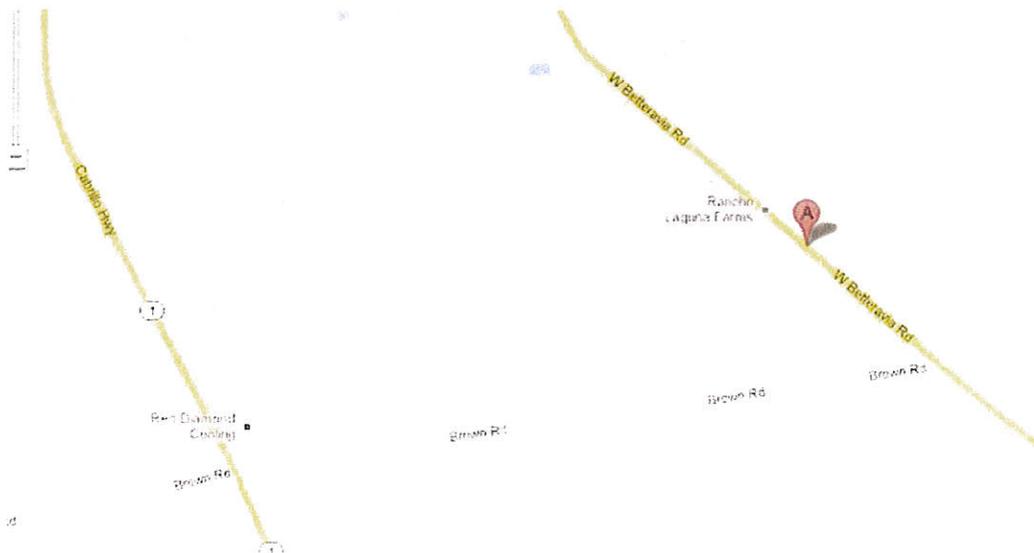
Prepared by: Mike Needham ICS 201	Position/Title: Unified Command Date/Time:	Signature:
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1. Incident Name:
FreshwayFoods_40/60Romaine/Iceberg_E.coliO145_113012

2. Incident Number:

3. Date/Time Initiated:
Date: 11/30/2012 Time: 0800

5. Map/Sketch Deployment Area(s):
San Ysidro Farms – Ranch 8:



Prepared by: Mike Needham
ICS 201

Position/Title: Unified Command
Date/Time:

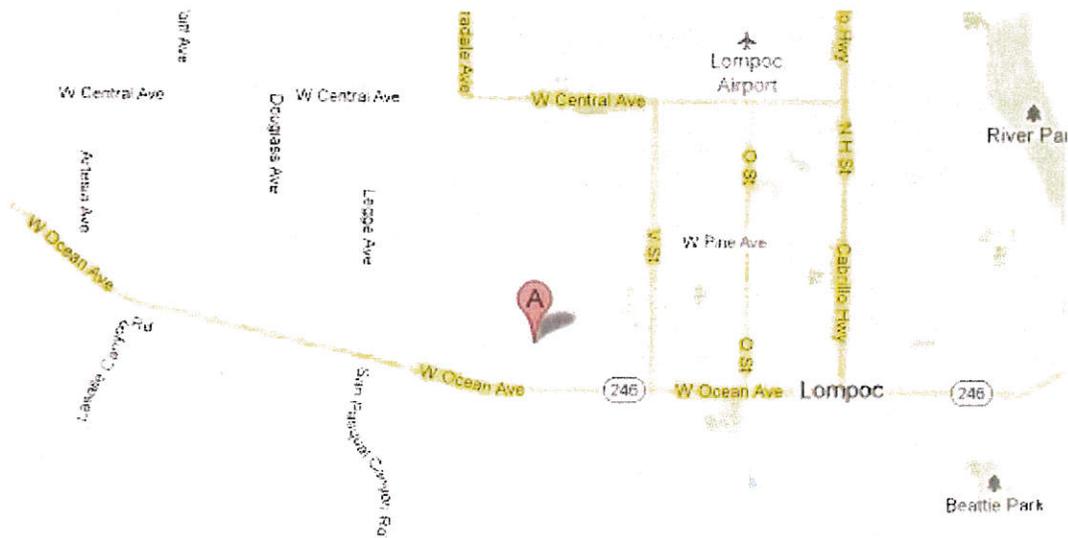
Signature:

1. Incident Name:
FreshwayFoods_40/60Romaine/Iceberg_E.coliO145_113012

2. Incident Number:

3. Date/Time Initiated:
Date: 11/30/2012 Time: 0800

Shiffrar Farms:



Prepared by: Mike Needham
ICS 201

Position/Title: Unified Command
Date/Time:

Signature:

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6. Situation Summary:

- **Background** – FDA was aware of only one E. coli O145 outbreak (different pattern) attributed to romaine lettuce in 2010. This outbreak was ultimately traced back to a single farm in Yuma, Arizona. Another E. coli O145 outbreak in the Southeast in spring/summer 2012 could not be linked to a food item.
- **11/2/2012** – CDC cluster code: 1210MLENM-1 - FDA reported an outbreak of E. coli O145 with PFGE pattern ENMX01.0149 / ENMA26.0166 in the following states: Georgia (1), Illinois (2), Indiana (7), and Michigan (3). Case count was listed as 13 with illness onset between 9/14/2012 and 10/25/2012. Two hospitalizations were reported and zero deaths. The case patient in Georgia was reported as a possible outlier with onset in mid September 2012. If Georgia was excluded the illness onset dates were 10/11/2012 through 10/25/2012.
 - **Epidemiology** – Early signals suggesting some type of produce. Several locations of a chain restaurant, Fazoli's, were identified as a common point of service for multiple cases.
 - **Traceback** – state of Indiana started traceback for several produce items at Fazoli's including 40/60 romaine/iceberg, dimare tomatoes, and fire roasted tomatoes. Indiana identified Sygma (3600 Southgate Dr., Danville, IL 61834) as the supplier of salad blend.
- **11/28/2012** – FDA updated FDB regarding the E. coli O145 outbreak. Case count had increased to a total of 16: Illinois (2), Indiana (8), and Michigan (6).
 - **Epidemiology** – 10 of 12 case patients reported eating at Fazoli's and the majority consumed 40/60 blend of romaine and iceberg.
 - **Inspection** – FDA was assigned to inspect Sygma on 11/8/2012 and Freshway on 11/16/2012. Product and Environmental samples collected at Freshway and were reported as negative for E. coli O145.
 - **Traceback** – FDA provided a traceback diagram for four case patients that consumed the implicated product at Fazoli's and identified 8 farms in California and 1 farm in Michigan.



DRAFT E.coli O145
Traceback flow diagram

○ Traceback diagram

Grower	Ranch	Location	Product	Quantity	Harvest Date
San Felipe Farms	San Benito	Hollister, CA	romaine	68 bins	9/26/2012, 9/27/2012
San Felipe Farms	Hudner	Hollister, CA	romaine	100 bins	9/26/2012, 9/27/2012
Ed Borchard & Son	Home	Salinas, CA	romaine	27? bins	9/28/2012
Van Dyk Farms		Imlay, Michigan	romaine	836 cases	10/5/2012
D'Arrigo Bros.	Ranch 22	Salinas, CA	romaine	60 bins	9/21/2012
Rancho Guadalupe		Santa Maria, CA	iceberg	232 bins	9/26/2012, 9/27/2012, 9/28/2012, 9/29/2012, 10/4/2012
Sunterra	Shiffrar Farms	Lompoc, CA	iceberg	12 bins	9/27/2012
Sunterra	San Ysidro	Nipomo, CA	iceberg	44 bins	9/28/2012
Joe Panziera Farms	Albertoni Ranch	Soledad, CA	iceberg	22 bins	10/3/2012
Major Farms	Los Coches	Salinas, CA	Iceberg	22 bins	10/3/2012

Prepared by: Mike Needham ICS 201	Position/Title: Unified Command Date/Time:	Signature:
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Major Farms	Los Coches	Salinas, CA	Romaine	?	?
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- 11/30/2012 – Nicole Yuen completed a review of all documents supplied along with the FDA traceback diagram (documents had to be picked up by FDB on 12/3/2012 due to the size of the file). The PO numbers of most interest (315894 and 316307) were supplied by Sygma to Fazoli's #1787, Fazoli's #5044, and Fazoli's #1634. These PO numbers were traced back to San Felipe Farms (romaine), Rancho Guadalupe (iceberg), and Sunterra/Shiffrar and San Ysidro (iceberg).
- 12/2/2012 – FDB contacted Sunterra and collected preliminary farm information for Shiffrar Farms and San Ysidro Farms. Both farms are located in the Santa Barbara area and are planted with broccoli. Farm information was provided by Sunterra on 12/3/2012. See following



FDA Report Update
120512.docx

document for Shiffrar and San Ysidro Farms:

7. Current and Planned Objectives:

- Develop an ICS structure to investigate the incident.
- Deploy staff to Shiffrar Farm and San Ysidro Farms

8. Current and Planned Actions, Strategies, and Tactics:

- Conduct farm investigations at Shiffrar Farms and San Ysidro Farms
- Collect appropriate farm documentation to support observations and statements
- Communicate information to Unified Command as appropriate.

9. Current Organization

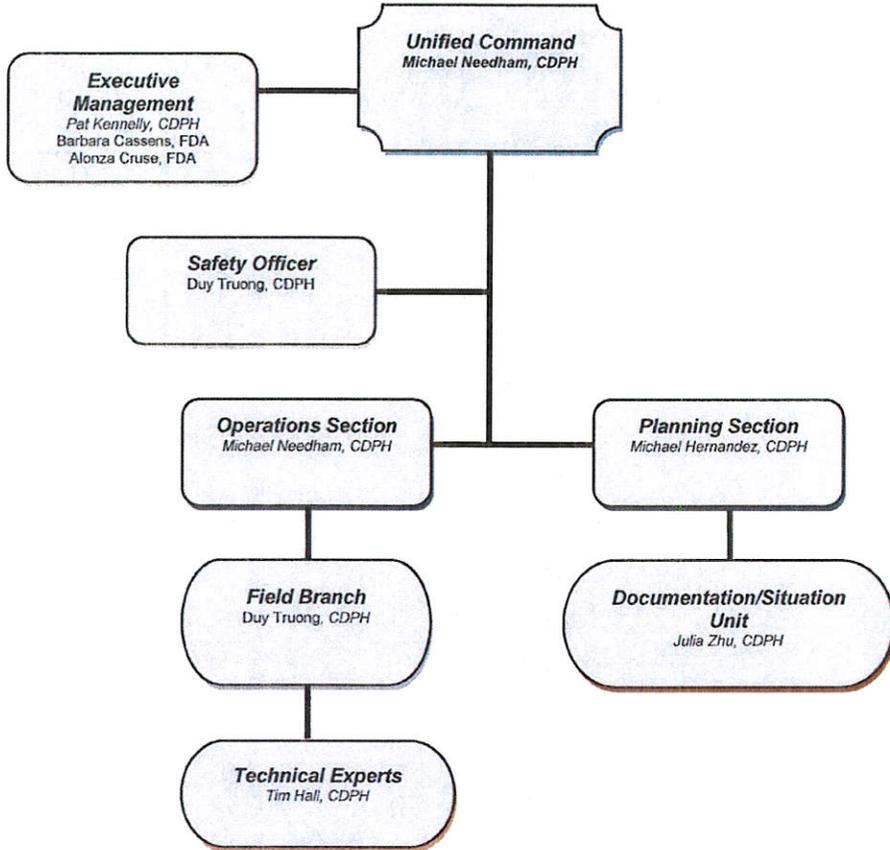
ICS – Command and General Staff

Position	Name	Agency	Office	Cell	Email
Incident Command	Mike Needham	FDB	Sacramento		Michael.needham@cdph.ca.gov
Deputy	Michael Hernandez	FDB	Sacramento		Michael.hernandez@cdph.ca.gov
Operations	Mike Needham	FDB	Sacramento		Michael.needham@cdph.ca.gov
Planning	Michael Hernandez	FDB	Sacramento		Michael.hernandez@cdph.ca.gov

Prepared by: Mike Needham ICS 201	Position/Title: Unified Command Date/Time:	Signature:
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ICS – Command and General Staff



Prepared by: Mike Needham ICS 201	Position/Title: Unified Command Date/Time:	Signature:
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Food Product Report

Firm Information

IncidentName: *E. coli* O145 outbreak – Illinois, Indiana, Michigan

Date: 12/3/2012

Firm Name: Sunterra

Address: 696 N. 8th Street, Brawley, CA

Contact: Vince Vioria

Phone: 760-344-9600

Contact: Garret Fargo

Phone:

Contact:

Phone:

Production Information

1. Product Name Lettuce Clean and Core

2. Sampling location N/A

3. Ingredients/Components (organic/conventional) Lettuce Clean and Core

4. Reporting Lab N/A

5. Product Lot Code N/A

6. Product Code Description Sunterra order #77239 / Freshway Foods PO 139106
Shiffar Farm – 12 bins / harvest 9/27/2012 - Field lot #9NA-12
San Ysidro Farms – 44 bins / harvest 9/28/2012 - Field lot #0804X-12

7. Best if Used by/Expiration date N/A

8. Product container size(s) bins

9. Brand Name(s) N/A

10. UPC code N/A

Processor Information

11. Processor/Manufacturer N/A

12. Processor Location N/A

13. Date(s) of production for affected lots N/A

14. Production line(s) N/A

15. Other products produced on same production line(s) on day(s) as affected product(s) N/A

16. Processing flow description or diagram - from receipt to shipping N/A

17. Daily sanitation procedures on affected production line(s) N/A

18. Sanitation schedules on affected production line(s) N/A

Food Product Report

19. Environmental monitoring: pathogens tested and frequency	N/A
20. Contract laboratory:	N/A
21. Lot testing conducted	N/A
22. Retain samples available	N/A
Farm / Field Information	
23. Date of Planting	Shiffrar 9N – 7-13-2012 San Ysidro Farms 0804X – 7-13-2012
24. Soil Amendments/conditioners - dates of application and sources	See attached grower letter of guaranty
25. Harvest date(s) of affected products	Shiffrar – Order # 77239. 8 bins harvested 9/27/2012. 2 bins harvested 9/28/2012. San Ysidro Farms – Order # 77239. 42 bins harvested 9/28/2012.
26. Farm address and GPS coordinates	San Ysidro Farms Office – 2299 Bonita School Road 93444. Nipomo, California USA. 34 (degrees) 59'43.02"N 120 (degrees) 30'49.31" W Elevation 132 ft San Ysidro Farms Ranch 8 – Betteravia and Brown Road. 93454 Santa Maria, CA USA 34 (degrees) 56'20.63" N 120 (degrees) 32' 59. 07" W Elevation 107 ft. Shiffrar Ranch – 21-27 Bailey Ave 93436 Lompoc, CA USA. 34 (degrees) 38' 35.61 N 120 (degrees) 29' 13.35" W Elevation 76 ft
27. Harvest amounts for field and affected products	Shiffrar – Order # 77239. 10 bins with 7, 098 lbs. Total Harvest of 300 bins with 217, 883 lbs. San Ysidro Farms – Order # 77239. 42 bins with 32, 342 lbs. Total Harvest of 826 bins with 707, 522 lbs.
28. Field Assessments – LGMA or other – any pre or post harvest testing (provide results)	See attached documents
29. Grower and address	San Ysidro Farms Office – 2299 Bonita School Road 93444 Nipomo, CA USA Shiffrar – 21-27 Bailey Ave 93436 Lompoc, CA USA
30. Harvester(s) and address	United Ag - 301 West Church Road, Salinas, CA
31. Cooler name and address	Guadalupe Cooling - 2040 Guadalupe Rd. 93444 Nipomo, CA USA
32. Irrigation water supply	Well
33. Irrigation water testing and frequency	Generic E. Coli done monthly
34. Irrigation method	Overhead sprinkler
35. Current condition of field	Broccoli
36. Comments	

Cal FERT General Farm Questionnaire

Outbreak/Investigation Name: Fazolis_IN_Romaine_EcoliO145_113012

Date of onsite visit: 12/11/2012 Time: 1200

I. Investigators / Agencies:

a) Nicole Zugsmith / CDPH	b)
c)	d)

Reason for investigation: Conduct farm investigation – Shiffrar Farms

Person interviewed: Richard Shiffrar	Company: Shiffrar Farms	Phone: 805-929-8045
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II. Crop Information

Ranch Name: Ranch 1
 Directions to the ranch/field(s): North of West Ocean Avenue (246), West of Bailey Avenue

Crop Harvested: Lettuce Variety: Iceberg
 Organic Conventional Transitional

Harvesting Method:
 Field Packed Bin Packed Totes
 Whole Head Cored Trimmed
 Mechanical Hand Other

Grower Name: Shiffrar Farms Phone: 805-680-4643

Address: 21-27 Bailey Ave., Lompoc, CA 93436 Cell: [REDACTED]

Buyer Name: Sunterra Produce Phone: 760-344-9600

Address: 696 N 8th St., Brawley, 92227 Cell: N/A

Cooler Name: Guadalupe Cooling Co. Phone: 805-343-2331

Address: 2024 Guadalupe, Nipomo, 93444 Cell: N/A

Years Farming Ranch: 22 years Own Lease Owner: Edward Wineman
 Time Period for lease: annual Rotate Lease: Yes No Crop: Lettuce, broccoli

If lease rotated, name of other grower:

Rotate Crop: Yes No Crop: Growing Dates:

Cover Crop: Yes No Crop: Growing Dates:

Third Party Audit: Yes Company: [REDACTED] Last Audit: 4/13-15/12 No

Requested Copy: Yes No

Other Audits: Yes Company: Last Audit: No

Requested Copy: Yes No

Requested a ranch map: Yes No

III. Planting / Harvest Information:

Field & Lot: 9NA-12	Planting Date: 7/13/2012	Harvest Date: 9/27-28/12
Field & Lot: N/A	Planting Date: N/A	Harvest Date: N/A
Field & Lot: N/A	Planting Date: N/A	Harvest Date: N/A

Requested copy of planting/harvest schedule: Yes No

IV. Harvesting:

Do you perform your own harvesting: Yes No

Harvest Company: Sunterra Produce Contact: Garret Fargo

Address: 696 N 8th St., Brawley, 92227

Phone: 760-344-9600 Cell: N/A

V. Weather Conditions within last year:

Flooding: Yes No Date: N/A Fields Affected: N/A

Cause: N/A

Samples/testing and results done: Yes No

Requested Copy: Yes No

Contamination (sewage, compost, waste) from runoff: Yes No

Describe: N/A

VI. Water:

Irrigation Source: Well 1

Reservoirs on ranch: Yes No

Describe uses for reservoirs: N/A

Open ditches / canals: Yes No Describe Uses: runoff

Number of Wells: 2

Well / irrigation water testing: Yes No

Requested Copy: Yes No

Well SOPs for microbiological test results: Yes No

Requested Copy: Yes No

Irrigation Methods: sprinkler

Recycled Water: Yes No

Source: N/A Describe Use: N/A

Sanitizer Used for Irrigation Water: Yes No

Describe: Potable water

VII. Farm Equipment

Shared with Others: Ranches: Yes No Growers: Yes No

Used for Compost: Hauling: Yes No Spreading: Yes No

Cleaned: Yes No

Describe Method of Cleaning:

VIII. Manure / Compost:

Raw Manure: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Manure Type:
Last Application Date: N/A	Supplier: N/A
Address: N/A	Phone: N/A
Compost Used: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Type: Green waste <input type="checkbox"/> Mushroom compost <input type="checkbox"/> Biosolids <input type="checkbox"/> Other: N/A	
Manure/compost stored onsite: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Describe Where & Concerns: N/A	
Last Application Date: N/A	Compost Type applied: N/A
Supplier: N/A	
Address: N/A	Phone: N/A
Last Application Date: N/A	Compost Type applied: N/A
Supplier: N/A	
Address: N/A	Phone: N/A
Who owned compost hauling equipment: N/A	Phone: N/A
Who owned compost spreading equipment: N/A	Phone: N/A
Requested Copy of manure / compost COAs and application logs: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

IX. Applications and Water Source:

Fertilizers:

Nitrogen, phosphorous, potassium (synthetic)

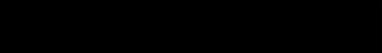
Type:

<u>Water Source:</u>	
Always Suppliers: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Sometimes Suppliers: Yes <input type="checkbox"/> No <input type="checkbox"/>
Always well: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Sometimes well: Yes <input type="checkbox"/> No <input type="checkbox"/>
Always ditch/drainage: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Sometimes ditch/drainage: Yes <input type="checkbox"/> No <input type="checkbox"/>
Type:	Supplier:
	Phone:

Water Source:

Always Suppliers: Yes <input type="checkbox"/> No <input type="checkbox"/>	Sometimes Suppliers: Yes <input type="checkbox"/> No <input type="checkbox"/>
Always well: Yes <input type="checkbox"/> No <input type="checkbox"/>	Sometimes well: Yes <input type="checkbox"/> No <input type="checkbox"/>
Always Ditch/drainage: Yes <input type="checkbox"/> No <input type="checkbox"/>	Sometimes ditch/drainage: Yes <input type="checkbox"/> No <input type="checkbox"/>

Pesticides:

	Supplier: 
	Phone: 

<u>Water Source:</u>									
Always Suppliers:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Sometimes Suppliers:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Always well:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Sometimes well:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Always Ditch/drainage:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Sometimes ditch/drainage:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Type:	Municipal – City of Guadalupe			Supplier:					
				Phone:					

<u>Water Source:</u>									
Always Suppliers:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Sometimes Suppliers:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Always well:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Sometimes well:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Always Ditch/drainage:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Sometimes ditch/drainage:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Type:				Supplier:					
				Phone:					

Requested copy of letter of guarantee for all application water: Yes No

X. Animals:

Wild: Pigs Geese Deer Coyote Rodents Birds Other gophers

Frequency: Daily Occurrence time / date:

Discouragement Tactics: Macabe traps, screamers

Domestic: Dogs Horses Cows Pigs Chickens Other cats

Animals grazing on ranch: Yes No Describe:

Animals nearby: Yes No Describe: Three cats were observed on a porch at a house on Bailey Avenue. One fenced dog was observed in the rear of the house

List and describe observations relating to evidence of animal activity (feces, tracks, foraging) and compost (smell, piles, equipment) *continue on page 8 if needed

Birds were flying over the ranch and bird tracks were observed in the dirt of the runoff ditch NW of Lot 9N.

XI. Farm Workers (not harvest crews):

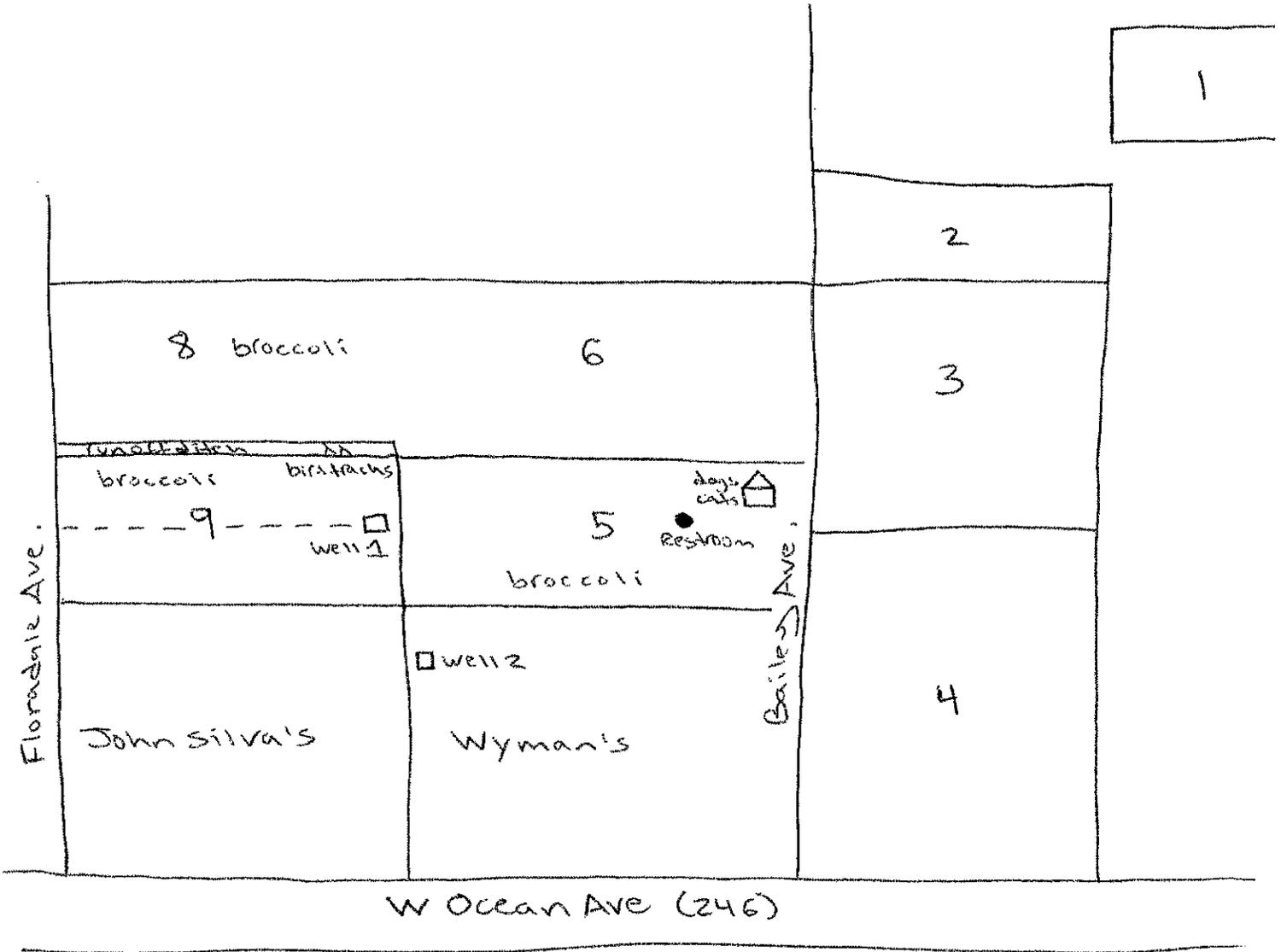
Training in workers' language:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>					
GAPS:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Sanitation:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	SOPs:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Requested copy of employee "sign-off" sheets for above trainings:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>					
Illness records maintained:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Requested Copy:		Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Farm workers present during investigation visit:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>					

XII. Restroom Facilities:

Portable Restrooms:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Distance from field(s):	1300 feet
Service Company:		Central Coast Industries		City: Nipomo, CA	
Service Schedule:		weekly			
Service Log:		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Last service date: 12/11/12	
Adequately supplied (soap, towels, water, etc.):		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Describe condition of portable restrooms:		Acceptable			
Permanent Restrooms:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Distance from field(s):	
Adequately supplied (soap, towels, water):		Yes <input type="checkbox"/>	No <input type="checkbox"/>		
Describe condition of permanent restrooms:					

Ranch Diagram:

Draw a diagram that shows the surrounding area of the ranch:



Include:

- Perimeter (roads, other ranches/fields, grazing animals, farmland, domestic animals, dairies, composting, water)
- Houses on ranch if not on ranch map
- All nearby (within 1/2 mile) creeks, agriculture ditches, rivers, reservoirs, lakes)
- Anything that could contribute to a contamination of water, pathogens, or manure to ranch
- Include the GPS for the corners of all fields
- Include GPS for wells supply water to fields

XIII. Field GPS:

Field & lot:	Latitude (N):	Longitude (W):
NE Corner:		-
NW Corner:		-
SW Corner:		-
SE Corner:		-
Field & lot:	Latitude (N):	Longitude (W):
NE Corner:		-
NW Corner:		-
SW Corner:		-
SE Corner:		-
Field & lot:	Latitude (N):	Longitude (W):
NE Corner:		-
NW Corner:		-
SW Corner:		-
SE Corner:		-

XIV. Water GPS:

Remember to identify wells in same manner as on ranch map.	Latitude (N):	Longitude (W):
Well name:		-
Wellhead #:		
Well name:		-
Wellhead #:		

Field 9NA-12 was planted with broccoli at the time of this investigation. During the time of this investigation, significant conditions were not observed that could have been attributed to product contamination with *E. coli*.

Attachments:

- A. Ranch #1 map
- B. Iceberg lettuce testing – pre-harvest
- C. Pre-harvest field inspection dated 9/22/2012
- D. Shiffrar Farms compost and fertilizer statement
- E. Documents submitted by Shiffrar Farms – training and water testing
- F. Photographs