

ERU ACTIVITY SUMMARY REPORT

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|---|--|-------------------------------------|----------------------------|
| INVESTIGATION NAME: J:\ERU\Investigations\Investigations 2012\PeterRabbit_Romaine_EcoliO157H7_OC&Canada_050112\Reports | | ASSIGNMENT DATE: 06/01/12 | |
| ERU LEAD: Birusingh, Karl #191 | | | |
| FIRM NAME: Curry House | | | |
| ADDRESS: 10953 Meridian Drive, Suite P | | CITY: Cypress | ZIP CODE: 90630 |
| FIRM CONTACT: Ria Gonzalez, Manager | | PHONE: 714-527-6224 | OTHER CONTACT INFO: |
| REPORTING PERSON/AGENCY: Canadian Food Inspection Agency | | PHONE: n/a | |
| ACTIVITY: <input checked="" type="checkbox"/> PRODUCE 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: | | | |
| BACKGROUND: <p>In early May 2012, the California Department of Public Health (CDPH), Food and Drug Branch (FDB), was notified of a cluster of <i>E. coli</i> O157:H7 cases (6) with matching Pulsed Field Gel Electrophoresis (PFGE) patterns identified as; EXHX01.0074 / EXHA26.0569. The cases were reported to have worked or consumed food at a single Curry House restaurant in Cypress, CA on 4/11/2012 or 4/12/2012. Two of the case patients were reported as food handlers at the Curry House location. An epidemiological investigation completed by Orange County Health Care Agency (OCHCA), identified the consumption of side salad, which included romaine lettuce, to be associated with illness. Considering exposure was limited to a single restaurant amongst a chain and ill food handlers worked at the facility during the exposure time, the <i>E. coli</i> illnesses were thought to have been associated with ill food handlers. Orange County closed the investigation after three weeks had passed and no additional cases were identified.</p> <p>On May 18, 2012, FDB was informed by the CDPH, Infectious Diseases Branch (IDB) of an <i>E. coli</i> O157 illness outbreak in Canada that matched the outbreak strain associated with the Curry House in California. Canada reported 23 confirmed cases as of June 1st, 2012 in two provinces – New Brunswick (Jungle Jim's restaurant / 14 cases) and Quebec (Mother Nature restaurant / 9 cases). Illness onsets were between 4/19 – 5/9, with a sharp peak in cases around 4/28. At least 70% of the ill patients reported consuming romaine lettuce. All of the cases had PFGE patterns that matched the California cases and 22 of the 23 Canadian cases had a matching multiple-locus variable number tandem repeat analysis (MLVA) profile. Epidemiological data collected by the Canadian Food Inspection Agency (CFIA) implicated romaine lettuce as the source of the illness.</p> | | | |
| SUMMARY OF ACTIVITY: <p>Traceback data supplied by CFIA indicated Jungle Jim's in New Brunswick had received romaine lettuce from Amazing Coachella Inc. (DBA Peter Rabbit Farms) and Dole during the time period of interest. Mother Nature in Quebec had also received romaine lettuce from Amazing Coachella Inc.</p> <p>Traceback data collected by FDB indicated that the Curry House restaurant in Cypress had received romaine lettuce from Andy Boy and Amazing Coachella Inc. during the period of interest. Considering delivery dates and consumption rates at Curry House, the romaine lettuce likely served to cases was from Amazing Coachella Inc.</p> <p>The romaine lettuce in common between Curry House in California, Jungle Jim's in Canada, and Mother Nature in Canada was supplied by Amazing Coachella Inc. in Coachella, California.</p> <p>Traceback documents were collected from Amazing Coachella, Inc. in Coachella, CA, Regan Distributors in Santa Ana, CA, Times Produce Inc. in Los Angeles, CA, and ICREST Int. LLC in Carson, CA. The following summarizes romaine lettuce movement from Amazing Coachella Inc. to Curry House in Cypress, CA:</p> <ul style="list-style-type: none"> • Romaine lettuce was packed by Amazing Coachella Inc. on 3/30/2012, 4/2/2012, and 4/3/2012 from fields A7 and A15. • Amazing Coachella Inc. shipped 260 cases of romaine lettuce on 3/31/2012, 35 cases on 4/2/2012, and 210 cases on 4/5/2012 to Regan Distributors in Santa Ana, CA. (exhibit A) • Regan Distributors shipped 70 cases of Peter Rabbit romaine lettuce to Times Produce Inc. in Los Ang | | | |

- on 4/5/2012. (exhibit B)
- Times Produce Inc. shipped 14 cases of Peter Rabbit romaine lettuce to ICREST Int. LLC in Carson, CA on 4/9/2012. (exhibit C)
- ICREST Int. LLC shipped 1.5 cases of romaine lettuce to Curry House in Cypress, CA on 4/10/2012. (exhibit D)

The ICREST Int. LLC invoice #188074 (exhibit D) shows 1.5 boxes of "Lettuce Romaine 24 USA" being shipped to Curry House in Cypress, CA on 4/10/2012. Although this invoice did not specify Peter Rabbit romaine lettuce, a review of shipping practices and product turnover rate indicated that the most likely source of the 1.5 boxes of "Lettuce Romaine 24 USA" was Amazing Coachella Inc.

FINDINGS AND CONCLUSIONS:

Epidemiological investigations conducted by OCHCA in California and CIFA determined that case patient illness was linked to the consumption of romaine lettuce. Amazing Coachella Inc. shipped Peter Rabbit Farms branded romaine lettuce to each of the three restaurants associated with illness in California and Canada during the periods of interest. Peter Rabbit Farms romaine lettuce was the only brand of romaine lettuce common between the three restaurants. The case patients at all three restaurants were infected with *E. coli* O157:H7 with matching PFGE patterns.

SUPPORTING DOCUMENTATION:

- Exhibit A – Invoices and Bills of Lading from Peter Rabbit Farms to Regan Distributors
- Exhibit B – Invoices from Regan Distributors to Times Produce showing Peter Rabbit romaine
- Exhibit C – Invoices from Times Produce to ICREST Int. LLC showing Peter Rabbit romaine
- Exhibit D– Invoice from ICREST Int. LLC to Curry House showing "lettuce romaine 24 USA"
- Exhibit E – Photograph of the case packaging – Peter Rabbit Farms California Romaine
- Exhibit F – Traceback timeline

ERU ELECTRONIC FILE LOCATION: J:\ERU\Investigations\Investigations 2012\CurryHouse_Romaine_EcoliO157H7_OC_050112

ENFORCEMENT ACTIONS: NOV ISSUED EMBARGO VC&D REG LETTER REFERRAL OTHER:

RECOMMENDATIONS: NAI MINOR VIOLATIONS / FIRM CORRECTING OTHER:

COMMENTS / FOLLOW-UP ACTION: Conduct a farm field investigation at Amazing Coachella, Inc. dba Peter Rabbit Farms.

| | | |
|---|---------------------|------------------------------------|
| ERU LEAD SIGNATURE: Karl Birusingh | INV.# 191 | REPORT DATE: 8/16/2013 |
| SUPERVISOR SIGNATURE: Michael D. Needham #094 | | DATE REVIEWED: 4/10/2013 |
| SUPERVISOR DISPOSITION: | | |

*NAI - no significant finding at implicated fields
- monitor for any additional E. coli illnesses*

(8/28/08- ERU ACTIVITY SUMMARY FORM)



Cal FERT General Farm Questionnaire

Outbreak/Investigation Name: Amazing Coachella, Inc.; DBA: Peter Rabbit Farms

Date of onsite visit: 06/12, 06/13/2012 Time: 0700-1530

I. Investigators / Agencies:

a) Marcus Yambot/USFDA

b) James Barreto/USFDA

c) **Duy Truong/CDPH-FDB**

d)

Reason for Investigation:

In early May 2012, the California Department of Public Health (CDPH), Food and Drug Branch (FDB), was notified of a cluster of *E. coli* O157:H7 cases (6) with matching PFGE patterns in Orange County. On May 18, 2012, FDB was informed by the CDPH-Infectious Diseases Branch (IDB) of an *E. coli* O157 illness outbreak in Canada that matched the outbreak strain of the Orange County outbreak. The Canadian Food Inspection Agency (CFIA) reported 23 confirmed cases in two provinces – New Brunswick (Jungle Jim's restaurant / 14 cases) and Quebec (Mother Nature restaurant / 9 cases). Orange County Health Care Agency and CFIA implicated romaine lettuce as the likely source of the illnesses. An investigation conducted by FDB traced the source of romaine to Amazing Coachella (DBA: Peter Rabbit Farms), "Ranch A North, Block 7" (A7) and "Ranch A South, Block 15" (A15), as the source of head romaine lettuce during the period of interest.

Person interviewed:

John Powell, Jr., President & CEO
Pablo Molina, Dir. of Food Safety
John Burton, Plant Manager

Company:

Peter Rabbit Farms
Peter Rabbit Farms
Peter Rabbit Farms

Phone:

760-398-0151, [REDACTED] (cell)
760-398-0151, [REDACTED] (cell)
760-398-0151

II. Crop Information

Ranch Name:

Ranch A South, Block 15 consisted of approximately [REDACTED] acres of which 6, Western acres, were used to grow romaine lettuce. The remaining acreage was used to grow soft, leaf and red leaf lettuce. Ranch A north, Block 7 consisted of approximately [REDACTED] acres of which 18, eastern acres, were used to grow romaine lettuce. The remaining acreage was used to grow broccoli.

Directions to the ranch/field(s):

The firm farmed all products within a 15 mile radius. The implicated fields were:
Ranch A South, block 15 was located at corner of 58th Ave. and Harrison St.
Ranch A North, block 7 was located North of 58th Ave., between Harrison St. and Van Buren St.

Crop Harvested: Implicated product: Romaine lettuce Variety: Unknown
Organic Conventional Transitional

Harvesting Method:

Field Packed Bin Packed Totes
Whole Head Cored Trimmed
Mechanical Hand Other

Grower Name: Peter Rabbit Farms Phone: 760-398-0151

Address: 85-810 Peter Rabbit Lane, Coachella, CA 92236 Cell: [REDACTED] John Powell Jr.
Pablo Molina

Buyer Name: n/a Phone: n/a

Address: n/a Cell: n/a

Cooler Name: Peter Rabbit Farms Phone: 760-398-0151
 Address: 85-810 Peter Rabbit Lane, Coachella, CA 92236 Cell: [Redacted] John Powell Jr.
 Pablo Molina
 Years Farming Ranch: 20+ Own Lease Owner: E. D. Mitchell.
 Note that the firm owned A7 and leased A15.
 Time Period for lease: 20+ Rotate Lease: Yes No Crop:
 If lease rotated, name of other grower: n/a

Rotate Crop: Yes No Crop: Lettuce in winter & fall; eggplants in fall & spring; broccoli in winter; cauliflower in winter, peppers in fall & spring. Growing Dates: See left

Cover Crop: Yes No Crop: n/a Growing Dates: n/a

Third Party Audit: Yes Company: LGMA Last Audit: 03/28/2012 No
 Requested Copy: Yes No Only requested summary page. See Exhibit 1a.
 Other Audits: Yes Company: [Redacted] Last Audit: 12/23/2012 No
 Requested Copy: Yes No Only requested summary page. See Exhibit 1b.
 Requested a ranch map: Yes No See Exhibit 6.

III. Planting / Harvest Information:

| | | |
|------------------|---|--------------------------------|
| Field & Lot: A15 | Planting Date: 12/26/2011, 6 acres | Harvest Date: 04/02-04/04/2012 |
| Field & Lot: A7 | Planting Date: 12/12, 12/13, 12/20/2011, 6 acres each day | Harvest Date: 03/26-03/30/12 |
| 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: Rancho Harvest, Inc. Contact: Louise Reyes
 Address: 125 W. Mill Street, Santa Maria, 93458
 Phone: 805-390-3567 Cell: n/a

V. Weather Conditions within last year:

Flooding: Yes No Date: _____ Fields Affected: _____
 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: Colorado River → American Canal → Coachella Water District → Reservoir → Irrigation

Reservoirs on ranch: Yes No

Describe uses for reservoirs: Water was used for irrigation.

Open ditches / canals: Yes No Describe Uses: n/a

Number of Wells: For the implicated fields, there was one well close to A7. This well was not used to supply irrigation water to fields A7 and A15.

Well / irrigation water testing: Yes No

Requested Copy: Yes No See Exhibit 4.

Well SOPs for microbiological test results: Yes No

Requested Copy: Yes No See Exhibit 3.

Irrigation Methods: Furrow and sprinkler for A15. Furrow for A7.

Recycled Water: Yes No

Source: n/a Describe Use: n/a

Sanitizer Used for Irrigation Water: Yes No

Describe: No treatment was used for the reservoir 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
 If yes, when: Harvest equipment was owned by Rancho Harvest. Per Mr. Molina, knives were cleaned daily. Machinery was cleaned every 15 days or sooner. Planting equipment was owned by Peter Rabbit Farms. Cleaning was before the season and as often as necessary.

Describe Method of Cleaning: Harvest equipment: powerwash and scrubbing and rinsed with chlorinated water between [redacted] ppm. See Exhibit 8.

VIII. Manure / Compost:

| | | | |
|---|---|------------------------------------|--------|
| Raw Manure: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | | Manure Type: No manure was used. | |
| 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: |
| 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:

Only synthetic fertilizers were used. See Exhibit 5.

Type: The supplier was [REDACTED]

| | | | |
|---|---|--|--|
| <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 checked="" 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: n/a | Supplier: n/a | | |
| | Phone: n/a | | |

| | | | |
|---|--|--|--|
| <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"/> | | |

Pesticides:

| | |
|----------------------|--|
| Type: See Exhibit 5. | Supplier: Foster-Gardener, Inc., 1 st St., Coachella, 92236 |
| | Phone: 760-398-6151 |

| | | | | | | | | | |
|---|---------------|-------------------------------------|----|--------------------------|---------------------------|-----|--------------------------|----|--------------------------|
| 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 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 type="checkbox"/> | Sometimes ditch/drainage: | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| Type: | Supplier: n/a | | | | | | | | |
| n/a | Phone: n/a | | | | | | | | |
| 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"/> |
| Type: | Supplier: n/a | | | | | | | | |
| n/a | Phone: n/a | | | | | | | | |
| Requested copy of letter of guarantee for all application water: Yes <input type="checkbox"/> No <input type="checkbox"/> | | | | | | | | | |

X. Animals:

Wild: Pigs Geese Deer Coyote Rodents Birds Other

Frequency: Four birds were observed at a reservoir near block A15. Occurrence time / date: ~0930, 06/12/2012

Discouragement Tactics: Bird bombs were used during germination periods.

Domestic: Dogs Horses Cows Pigs Chickens Other Unknown

Animals grazing on ranch: Yes No Describe:

Animals grazing nearby: Yes No Describe: Per Mr. Molina, horses and cows were maintained at adjacent ranches. These animals were maintained inside fenced enclosures.

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

Block A15 and A7 were fallow at the time of this investigation.

Bird food prints and paw prints (possibly canine) were observed at the reservoir edge (adjacent to A15). Four birds were also observed on the ground at this reservoir. Horse prints and paw prints were observed along the west dirt road of A15. Droppings (possibly of a horse) were observed on the north side, outside the fence adjacent to A15. Paw prints were observed on the east dirt road of A7. Mr. Molina reported that

the firm finished installing fences around the reservoirs on 4/12/2012. This action was taken as a result of a Leafy Green Marketing Agreement (LGMA) audit observation.

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 type="checkbox"/> | No | <input checked="" type="checkbox"/> | | | | | | |
| Illness records maintained: | | | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | Requested Copy: | | | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | | |
| Farm workers present during investigation visit: | | | | | | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | The fields were empty during the investigation. Mr. Molina provided training for Peter Rabbit Farms' employees. | | | | | |

XII. Restroom Facilities:

| | | | | | | | | | | | | |
|---|--|-----|-------------------------------------|-----------|-------------------------------------|-----------------------------|--|----|--------------------------|--|--|--|
| Portable Restrooms: | | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | Distance from field(s): | Per Mr. Molina, restroom trailers were parked on the road as close to the workers as possible. | | | | | |
| The restrooms were owned by Rancho Harvest, Inc. Rancho Harvest managed services with local companies. There was no harvest at the time of this investigation. Mr. Molina reported that the restrooms were adequately supplied and clean. | | | | | | | | | | | | |
| Service Company: | | | | See above | | City: n/a | | | | | | |
| Service Schedule: | | | | n/a | | | | | | | | |
| Service Log: | | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | Last service date: n/a | | | | | | |
| Adequately supplied (soap, towels, water, etc.): | | | | | | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | | | |
| Describe condition of portable restrooms: | | | | See above | | | | | | | | |
| Permanent Restrooms: | | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | Distance from field(s): n/a | | | | | | |
| Adequately supplied (soap, towels, water): | | | | | | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | | | |
| Describe condition of permanent restrooms: | | | | n/a | | | | | | | | |

Ranch Diagram:

Draw a diagram that shows the surrounding area of the ranch:
See Exhibit 6.

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 ½ 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): |
|-------------------------|----------------------|-----------------------|
| A South block A15 | | |
| NE Corner: | 33.627235 | - 116.181235 |
| NW Corner: | 33.627502 | - 116.185752 |
| SW Corner: | 33.623804 | - 116.185720 |
| SE Corner: | 33.623831 | - 116.181386 |
| Field & lot: | Latitude (N): | Longitude (W): |
| A North block A7 | | |
| NE Corner: | 33.631058 | - 116.189979 |
| NW Corner: | 33.631138 | - 116.194249 |
| SW Corner: | 33.627547 | - 116.194228 |
| SE Corner: | 33.627601 | - 116.3189872 |
| Field & lot: | Latitude (N): | Longitude (W): |
| n/a | | |
| NE Corner: | n/a | - n/a |
| NW Corner: | n/a | - n/a |
| SW Corner: | n/a | - n/a |

| | | |
|------------|-----|-------|
| SE Corner: | n/a | - n/a |
|------------|-----|-------|

XIV. Water GPS:

| Remember to identify wells in same manner as on ranch map. | | Latitude (N): | Longitude (W): |
|--|------|---------------|----------------|
| Well name: | WWA7 | 33.631049 | - 116.193702 |
| Wellhead #: | WWA7 | | |
| Well name: | n/a | n/a | - n/a |
| Wellhead #: | n/a | | |
| Well name: | n/a | n/a | - n/a |
| Wellhead #: | n/a | | |
| Well name: | n/a | n/a | - n/a |
| Wellhead #: | n/a | | |
| Well name: | n/a | n/a | - n/a |
| Wellhead #: | n/a | | |
| Well name: | n/a | n/a | - n/a |
| Wellhead #: | n/a | | |

Additional information (e.g., if more than two fertilizer or pesticide suppliers are used, animal/compost observations):

Other information:

The facility was approximately [redacted] square feet and employed [redacted] employees. Business hours were 0700-1700, Monday to Friday. Manufacturing was 0700-0200, running two shifts. The facility was a cooling warehouse storing products before shipping.

No harvesting took place at the time of the investigation. Both fields (A7 and A15) were fallow. The firm worked with Rancho Harvest Inc. for about a year. Mr. Molina stated that the firm chose this contractor because of its more stringent food safety policies. He explained that Rancho Harvest employees wore gloves, hairnets, beard nets and aprons when working. Knives and gloves were not allowed to leave the field. The knives had plastic handles and stainless steel blades; these were left in chlorine solutions [redacted] ppm when not in use. Knives were cleaned in the morning and as needed. Gloves must be dipped in chlorine before work or when resuming work.

Rancho Harvest provided GAP training to its employees in Spanish and English. The foreman was responsible for monitoring employee health daily.

Packaging boxes had a wax liner and were non-reusable. Unused boxes were stored on site under cover. Boxes were only brought to the field to be formed and used when needed.

When cleaning, harvest equipment was brought out of the field, washed with a power washer using well water and then rinsed with chlorine [REDACTED] ppm. Equipment such as tractors were washed every 15 days or more often if needed.

The lettuce received a chlorine [REDACTED] ppm rinse in the field before boxing and taken back to the firm. Each box contained 24 heads. The flatbed truck transported 12 pallets each time. Products were cooled with a Hydro-Vac for approximately [REDACTED] minutes to drop the temperature to approximately [REDACTED] F and then stored in the cooler. The Hydro-Vac was rented annually during season; and was not on-site at the time of the inspection. Per Mr. Powell, the Hydro-Vac was swabbed once per month for *Listeria*. Water was used in the Hydro-Vac to control humidity but did not contact the product.

The cooler was observed at 36°F. Ice topping was not used. Temperature alarm was set at [REDACTED] F. Product may stay on site 0-5 days, but typically was shipped in 1-2 days. The romaine lettuce had a 15 day shelf life under optimal conditions. Outbound trucks were inspected for proper temperature and cleanliness prior to loading. The lot code had 7 digits; for example: 8910952 (89-crew identification, 1-crew location for the day, 095-Julian date, 2-year).

Mr. Molina inspected the fields 7 days prior to harvest and completed a check list looking for potential sources of contamination. See Exhibit 12.

Mr. Molina provided training to the employees. New employees received GAP training upon hire and refreshed at least annually. The firm typically had quarterly safety meetings and covered food safety topics.

Water was tested every month for *E. coli* by [REDACTED] in Santa Maria. The firm had a water usage policy and testing program. See Exhibit 3 & 4. Well water used by Rancho Harvest was from the well located inside the facility. [REDACTED] results were as follows.

- 02/27/12, Shed well behind office ≤ 1 MPN for *E. coli*.
- 03/27/12, Cooler old well at PRF shop ≤ 1 MPN for *E. coli*.

Three water samples were collected during this investigation. The first sample was collected at the "Shed Receiving Blue Hose" in the staging area. The second was collected at the reservoir supplying irrigation water to block A15. The third was collected at the reservoir supplying irrigation water to block A7. These were sent to the United States Food and Drug Administration (FDA), Pacific Region Laboratory Southwest for Enterohaemorrhagic Escherichia coli (EHEC) analysis and the results were negative.

The romaine lettuce fields were fallow at the time of this investigation. Harvest crew and harvest equipment were not on site to be evaluated for sanitary conditions and practices. A route or source of contamination could not be determined based on the conditions and observations made at the time of the investigation.

Attached are pictures taken during this investigation.



View of A15, corner of Harrison St. and 58th Ave.



Animal prints at reservoir supplying irrigation water to A15



Animal prints on dirt road West of A15



Birds at reservoir supplying irrigation water to A15



Old manure on dirt road located between A15 and the reservoir



Property North of A15 on other side of 58th Ave. - no animal activity observed



Reservoir supplying irrigation water to A15



Animal prints at reservoir supplying irrigation water to A7



More animal prints at reservoir supplying irrigation water to A7



Animal prints on dirt road between private property and East of A7



Trash at fence of the private property East of A7



Reservoir supplying irrigation water to A7



View of A7 from South end



View comparing elevation between A15 and private property on North side



Well head which supplied water to Harvest Team

Amazing Coachella, Inc. dba Peter Rabbit Farms

Romaine – Blocks A15 and A7 – 2012

Response to Request for Information

6-13-12
[Signature]

- 1a Third Party Audit – LGMA
- 1b Third Party Audit – Primus GFS
- 2a Planting Schedule
 - A7 – 12/12/11, 12/13/11, 12/20/11 (6 acres each day)
 - A15 – 12/26/11 (6 acres)
- 2b Harvest Schedule
- 3 Water Sampling Procedure
- 4 Water Test Results
- 5 Pesticide and Fertilizer Use
- 6 Ranch Maps
- 7 Amount of Romaine produced annually and how much product overall.
 - Romaine [redacted] ctns. Overall = [redacted] ctns.
- 8 Rancho Harvesting GAPs
- 9 Regan B of L and Invoices
- 10 Product sampling results
- 11 Daily Pre Harvest
- 12 7-Day Pre Harvest
- 13 Percent of Product shipped outside Ca. = 85%

| | |
|---------|------------------|
| Exhibit | <u>1-13</u> |
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| Date | <u>6/13/2012</u> |