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Kelly Bacon, CDS
Ref application: CU-23-00001 3 BR Custom Cuts
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Dear Kelly Bacon,

As the advisor on the 3 BR Custom Cuts project specializing in the operations of inspected meat processing facilities, I want to take the opportunity to write to you detailing our plans for Water, Offal & Inedible Product disposal.

Water, Offal & Inedible Product Mitigation Plan for 3BR Custom Cuts

Wastewater:

Wastewater will come from typical office personnel lavatory and sink use and from the processing side of the building. The wastewater treatment and septic system will be engineered to handle the water and waste from the restrooms and breakroom, as well as water containing some blood, liquid fat, and/or cleaning solutions that will be carefully captured on the processing side of the building. All water and waste will be monitored and managed according to permit requirements and county regulations. To accomplish proper processing of wastewater, there will be a strong mitigation system in place to keep solids and biochemical oxygen demand (BOD) components from reaching the treatment system.

<u>Blood</u> – blood will be captured during harvest before it reaches the engineered floor drains. The facility is designed to capture blood in a way that helps keep it from flowing into the drains, thus also keeping the blood from reaching the treatment system.

<u>Fat & Liquid Fat</u> — fat will be properly disposed of by simply removing solids from the floor and placing them into, covered and refrigerated, holding barrels for inedible by-products. Solid fat will not be allowed to reach the floor drains. The systems and processes are created to have employees gather fat during processing. In addition, each drain has a grate to keep fat solids and meat scraps out. Liquid fat will be present during cooking operations. As some "grease" may flow into a floor drain, a grease trap will be installed to keep any fats, oils, and grease from reaching the treatment system. This trap will be serviced by a company that specializes in maintaining and cleaning these purposeful tools.

Manure – there will be manure present in the animal handling pens, as well as some areas of the harvest facility floor. Manure will be physically removed from those areas often, throughout the day. Some traces of manure may enter the wastewater system, but not in an amount that will hinder the ability of the system to treat the water properly.



<u>Cleaning Solutions</u> – cleaning and sanitizing solutions used in the facility will be organic grade and designed for sanitizing the food processing environment, as well as being antimicrobial to greatly minimize any risk of food borne illness. These cleaning and sanitizing solutions are approved by the FDA and USDA to be used in meat processing facilities, and the wastewater treatment system is designed to handle processing them.

Offal:

Proper and sanitary disposal of offal and inedible by-products is not only a regulatory matter enforced by the USDA, it is also the commitment of 3BR Custom Cuts to dispose of these materials properly for environmental reasons and community responsibility.

Inedible materials from harvest and meat cutting processes include solid waste such as hides, gristle, viscera and feces. 3BR Custom Cuts is acutely aware of the influence our business can have on the surrounding area if these materials are not disposed of in the proper fashion to keep the property and facility clean and sanitary.

The first step in the inedible materials disposal plan includes placing these materials in sealed containers, in an indoor refrigerated unit, to limit leakage and/or odor. Once properly stored, a licensed disposal company will pick up these materials, multiple times a week, so that there is no aging at the facility. The disposal company hauls these materials away and renders them into usable ingredients in the cosmetics, pharmaceutical and food manufacturing industries. They have a long-standing history of good service to the meat processing industry. The USDA also requires the proper disposal of inedible material and that the professional rendering company's information and license remain on file in the facility.

3BR Custom Cuts understands how to properly store and remove solid inedible waste from the facility and implement proven training, monitoring and management of the integrated systems, tools and procedures necessary to prevent any potentially concerning sights, sounds or odors.

If there are any concerns or questions related to the disposal of the solid waste or wastewater that is to be produced during processing at the 3 BR facility, please don't hesitate to reach out.

Best Regards,

Christopher Fuller Fuller Consulting