July 14, 1971

Mr. Doyle Golden, Chief
Pesticide Residue Laboratories
Division of Chemistry
State Department of Agriculture
Mayo Building
Tallahassee, Florida 32304

Dear Doyle:

Thanks very much for throwing egg on me in the PCB-chicken caper from Holly Farms Poultry.

As we were unable to obtain a lot or plant number, we were able to only ascertain the following. They believe the product to have originated from their Monroe, North Carolina, plant between the dates of May 31 and June 4. The Monroe plant is only one of four plants, however, and if they are unable to supply an order, chickens may come out of one of the other three plants to supplement same for your area.

During the particular week, Holly Farms purchased chickens from five outside concerns. They also slaughtered chickens from 11 of their own farms (contract growers), which totaled about 260,000 birds.

We had a long talk with their director of research and quality assurance, as I am almost certain that we would be unable to run down the source of the high level of PCB's for your sample. This outfit makes 1800 tons of feed per day for their own flocks. In addition, they purchase about 25 percent of their birds from outside sources.

We probably will be reduced to looking at ingredients samples rather than trying to go to individual farms, as we couldn't get around in a month of Sundays to test all of them.

Further complicating the matter is the fact that when Holly Farms takes birds from any particular farm, they take all birds. Thus, on any of the farms mentioned they would have a new flock well along by now.

I have presented this in a somewhat facetious manner, as you can well recognize, but it is a problem that we are going to have to face

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and look into. At any rate, we are going to try to impress upon Holly Farms to get clean bills of health for their ingredients. They already have an agreement with their supplier of bakery meal that he will periodically have this tested and certified to them the absence of PCB's. I would suspect they might want to do this with their rendered fat, which is used in the feed also. I don't know for what reason, but Joe Conrey of C&MS, Washington, indicated that we would not find PCB's in rendered animal fat. This doesn't particularly set well, as my information is that these products are not steam deodorized; thus if PCB's were present in the rendered tissue they would end up in the fat used for feed manufacture.

Thanks for bringing the matter up, and if you people find any more samples of this level of PCB's (or any level for that matter), please let me know. Also, it would be a real help if you could give us a plant and lot number.

Yours very truly,

W. Y. Cobb
State Chemist

WYC/pg

P.S.: We have now acquired about ten samples of poultry byproduct meal rendered poultry grease, rendered animal fat, bakery meal and fish meal to chew on for awhile.

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