

**Report on Requested Feed Inspection Conducted at Pony Express Foods LLC**

**Pony Express Foods LLC  
1016 E Main St.  
Blue Ball, PA 17557**

**Date of Inspection:  
October 9, 2018**

**Performed by:  
Darryl Dressler  
Pennsylvania Department of Agriculture  
Region 6  
2301 N Cameron St.  
Harrisburg, PA 17110**

**The Pennsylvania Commercial Feed Act Inspection Report**

**Objective: This inspection was a follow-up to an ongoing investigation at Pony Express Foods LLC and Green Dragon. The objective was to collect resamples of Earth Animal Ventures No-Hide Chews for starch and protein analysis; and to resolve unanswered questions from the previous inspections.**

On 10/09/2018 at approximately 9:30a.m., Darryl Dressler, Plant Industry Inspection Technician, conducted a follow-up inspection at Pony Express Foods LLC, 1016 E Main St., Blue Ball, PA 17557. Dressler entered the office where he was met by Casey Martin, Plant Manager, presented PDA credentials, and issued a Notice of Inspection. Dressler explained to Mr. Martin that there are additional questions that have arisen from the previous inspections, and samples of the No-Hide Chews in production need to be retaken due to mold growth in the lab.

At that time, Mr. Martin called Travis Cundiff, Chief Operating Officer, to join the inspection to provide help with answering questions. Mr. Cundiff arrived shortly thereafter, and Dressler proceeded to address questions that need clarification.

[REDACTED]

Dressler explained that previous inspection findings do not show that products other than Earth Animal Ventures No-Hide Chews are manufactured at this location. Dressler asked Mr. Martin and Mr. Cundiff for clarification of all products, other than Earth Animal Venture No-Hide Chews, manufactured at the Pony Express Foods facility at 1016 E Main St., Blue Ball, PA 17557. Mr. Martin listed both animal and human foods that the business manufactures:

- Animal Food
  - Wild Bone Co. dog treats. [REDACTED]
- Human Food
  - Smoked sausage, kielbasa, sweet bologna, scrapple, pudding, ring bologna (original, [REDACTED]), meat sticks (original, [REDACTED])
  - Extruded products ([REDACTED])

Dressler asked if the manufacturing facility is cleaned between producing pet treats and human food. Mr. Martin stated that third shift conducts a cleanout procedure of the facility and all equipment.

Dressler explained that the inspection at the Green Dragon market on 10/05/2018, determined that the stand selling Pony Express Foods raw hides, and the Wild Bone Co. dog treats, displayed signage with name "Ameri-Pet". Dressler asked for the business relationship of Pony Express Foods LLC to Ameri-Pet or Wild Bone Dog Co. Mr. Cundiff clarified that both Ameri-Pet and Wild Bone Co. are brand names associated under Pony Express Foods LLC, and are not separate businesses. Mr. Cundiff added that the name "New Holland Meats" is also a brand under Pony Express Foods LLC. Dressler asked Mr. Cundiff if Pony Express Foods LLC is the guarantor of all pet food products branded as Ameri-Pet or Wild Bone Co. Mr. Cundiff confirmed that Pony Express Foods LLC is the guarantor. Dressler requested labeling for the Wild Bone Co. dog treats that are manufactured by the facility (Exhibit A).

Dressler explained that the inspection at the Green Dragon market on 10/05/2018 determined that unlabeled No-Hide Chews were offered for sale. Dressler asked Mr. Cundiff and Mr. Martin if the No-Hide Chews at the Green Dragon were the same as those manufactured for Earth Animal Ventures. Mr. Cundiff said he was not informed that No-Hide Chews were sent to the Green Dragon Market on that date, and that he should have been told of any volume of the chews before they were placed on the delivery truck going to the market. Mr. Cundiff continued to explain that the only way No-Hide Chews would go to the Green Dragon market is if they were rejects or products from research and development. Mr. Cundiff said that any rejects produced are offered to Earth Animal first, and can be sent to Green Dragon only after Earth Animal refuses the rejected volume. Mr. Cundiff and Mr. Martin did not recall the last time that No-Hide Chew rejects were sold at the Green Dragon. Dressler asked if the rejects are sold or distributed to any other location or business, and Mr. Cundiff replied that the Green Dragon is the only location that rejects would be sent for sale.

Dressler explained that the inspection on 09/18/2018 determined that some rawhide products are sold to local distributors that resell the products. Dressler asked Mr. Cundiff and Mr. Martin for clarification on the names of the distributors or retailers of the rawhides, as well as sales receipts for 2018 and labeling of rawhides provided from Pony Express Foods LLC. Mr. Martin clarified that the Green Dragon is the only place that rawhides are sold, and the box truck that delivers the product is own by Pony Express. Mr. Cundiff contacted his office to provide sales receipts for rawhides from the Green Dragon market. Dressler was given sales receipts for Green Dragon market (open Fridays only) from 01/04/2018 through 04/27/2018 (Exhibit B). Also provided to Dressler, were copies of labels that are placed on the boxes of rawhides prior to sale (Exhibit C).

At that time, Dressler explained that 2 resamples are needed of the No-Hide Chews from the production line, due to samples from the inspection on 09/18/2018 becoming moldy in laboratory storage. Dressler stated that previous observations show that Pony Express Foods LLC packages some No-Hide Chews in plastic bags, and asked Mr. Cundiff and Mr. Martin if there is a preservation method used. Mr. Cundiff explained that No-Hide packaging is either aerobic or anaerobic. Mr. Cundiff said the aerobic No-Hide product is not placed in a container, but rather banded with a label, while the anaerobic product is cooled to room temperature and placed in plastic packaging with an oxygen desiccant packet to promote oxygen absorption. Dressler requested a desiccant packet (Exhibit D).

Dressler explained that the samples obtained during the inspection will be placed in a paper bag, rather than a plastic bag. Dressler requested to take samples of a No-Hide prior to addition of batter, and a No-Hide finished product. Mr. Martin said he would escort Dressler through the facility for sample grabs, and asked Dressler to meet him at the front door to the manufacturing facility.

Dressler gathered sampling supplies, and met Mr. Martin and Mr. Cundiff at the entrance to the facility. At that time, Mr. Cundiff said he would excuse himself from the inspection, unless he was further needed. Dressler asked Mr. Cundiff if he had any questions or concerns, and Mr. Cundiff said he did not. Dressler thanked Mr. Cundiff for his time, and Mr. Cundiff left the facility.

Mr. Martin escorted Dressler to the production area where workers were applying batter to the No-Hide Chews. Dressler noted that beef batter was being applied at the time of inspection. Dressler obtained a sample of a No-Hide Chew without batter from a bin. Mr. Martin then led Dressler to a room with finished No-Hide Chews (with the batter baked on). Dressler took a sample. Each sample contains 3 subsamples.

Upon completion of sampling, Mr. Martin directed Dressler back to the entrance. Before departure, Dressler asked Mr. Martin if he had any questions or concerns. Mr. Martin stated that he had none, and Dressler departed the premises at approximately 1:00p.m.

**Attachments:**

PDA Notice of Inspection Issued to Casey Martin

Labels for all flavors of Wild Bone Co. dog treats (Exhibit A)

Sales Receipts for Rawhides sold at Green Dragon 01/04/2018-04/27/2018, 58 pages (Exhibit B)

Labels for boxes of Rawhides sold by Pony Express LLC (Exhibit C)

Packet of Oxygen Desiccant (Exhibit D)

October 11, 2018

Darryl Dressler  
Plant Industry Inspection Technician