



Maricopa County
subscription service



Standards Committee Meeting – April 6, 2016

Please [subscribe](#) if you would like to receive future agendas directly to your Inbox.



Date: April 6, 2016

**ENVIRONMENTAL HEALTH DIVISION
STANDARDS COMMITTEE MEETING**



Time: 9:30 am - 11:30 pm

Where:
1001 North Central Avenue
5th Floor Conference Room
Phoenix, AZ 85004

Meeting Minutes

The mission of the Environmental Services Department (Department) Standards Committee is to provide a time for standards to come together and discuss food code and to help our staff members provide consistent documentation of violations, and ensuring that our stakeholders understand the reasoning behind the decisions.

The vision is that all field inspectors and supervisors have a place to go with their questions and know that each item will be discussed with the division as a whole, that feedback (both discussion and code references) will be brought back to each office and inspectors will be consistently giving the same message to operators.

The Department currently has three (3) staff members that have been standardized by the FDA. Those staff members then standardize supervisors in each office who then will standardize their staff.

The procedure is that each Environmental Health Specialist (EHS) field staff notifies their supervisor of any code questions or interpretations that they may have. If supervisors are unable to give an answer or want more clarification, they will then send that information to the training officers and training supervisor. Once received, the question is sent to everyone on the standards committee so that they can start researching it and discussing it in their office. The question is also added to the

agenda for the next Standards Committee meeting.

We also welcome questions from establishments/stakeholders if there are any topics that need to be brought up.

The members will then meet and use codes, Department policies, and any supporting documentation to come up with a decision collaboratively and by consensus as to how the issue will be addressed by the Division. If the issue cannot be resolved, the committee may seek guidance from the FDA, USDA, ADA, Management team and/or Director if needed.

Any recent changes to local, State or Federal codes may also be discussed.

Topics discussed at this meeting:

Are microgreens a Time/Temperature Control for Safety (TCS) food?

Question/Issue:

The 2013 FDA Food Code defines CUT LEAFY GREENS to be fresh leafy greens whose leaves have been cut, shredded, sliced, chopped, or torn. The term encompasses, amongst other greens, iceberg lettuce, romaine lettuce, leaf lettuce, butter lettuce, and baby leaf lettuce (i.e., immature lettuce or leafy greens). The question posed is whether or not microgreens would fall under the immature lettuce or leafy greens designation? The department has been finding microgreens being used in various food establishments for garnish and/or part of a salad.

Response:

The FDA has been contacted and Microgreens are TCS and should be held at temperature. We'll consider it immature lettuce for now as described in the definitions section of the 2013 FDA Food Code. The inspectors should be asking the establishment(s) questions such as how the product is being received and how it's stored. If the establishment(s) are having a difficult time meeting the 41°F, they are allowed to use time as a control for this as long as they have a written policy in place.

Code Reference: 3-502.16

Violation(s): Time/Temperature Control for Food Safety Food shall be held at 41°F or less

Clarification on the use of "Sanisave" products

Question/Issue:

"SaniSave" is an industry brand of no rinse sanitizer being used in some establishments as a solution for cleaning and sanitizing deli slicers. Some questions have come up from department staff on how to properly assess "SaniSave's" proper use during inspections. Can it be used on deli slicers without ever having to break down the equipment into smaller components to be taken to the 3-compartment sink? What kind QT test strip should be used to measure is it a QT-40 test strip?

Response:

SaniSave does meet the FDA code and EPA labeling requirements, and does qualify for a "clean in place" product. In between the 4 hour window SaniSave may be used to wipe down a slicer of food contact surface like other sanitizers. Every 4 hours all removable parts (if any) must be taken off the base and all parts including the base must be cleaned properly. Think of SaniSave as a wash, rinse and sanitize solution all in one that requires at a minimum two uses. The first use is to clean off all the organic matter, and the second use is to sanitize the food contact surface (there is no need for a true rinse step). With the second use the contact time must be 60 seconds and allowed to air dry. Having said that, if the first use did not remove all the organic matter, the first step may have to be repeated (making it a total of three cleanings with the same product). Finally, best practices would suggest

that all removable parts be taken to be washed in the dish-room, but when using SaniSave it is not required. Technically they could remove all removable parts and clean them there on the counter, although not recommended.

Note: SaniSave is a broad range quat, the company provides its customers with QT-40 test strips. The product is dispensed via an automatic mixing dispenser via concentrate mixed with water. The dispenser is set to dispense at 300ppm by the company (anything between 150-400ppm is good).

Tips to the inspector:

Code Reference: 4-602.11(C)

Violation(s): If equipment is used with TIME/TEMPERATURE CONTROL FOR SAFETY FOOD, EQUIPMENT FOOD CONTACT SURFACES and UTENSILS shall be cleaned throughout the day at least every 4 hours.

Handwashing and glove use violations

Question/Issue:

There has been a debate on which violation to write when a food employee is observed handling equipment with his or her contaminated hands or gloved hands. For instance, an employee was observed with gloved hands handling raw chicken. The employee handles a walk-in door handle with the same contaminated gloves. Is this a matter of writing a "When to Wash" violation (2-301.14) or a "Gloves, Use Limitation" violation (3-304.15 (A))?

Response:

Inspectors should use "When to Wash" when an employee with or without gloves fails to wash their hands when they should.

Use the "Glove, Use Limitation" only for employees who are using the double glove method where the second glove is used as a "utensil" and they are doing it incorrectly thus causing contamination.

Code Reference:

2-301.14 – When to Wash

3-304.15(A) Gloves, Use Limitation

Violation(s): **2-301.14 – When to Wash** - FOOD EMPLOYEES shall clean their hands and exposed portions of their arms as specified under § 2-301.12 immediately before engaging in FOOD preparation including working with exposed FOOD, clean EQUIPMENT and UTENSILS, and unwrapped SINGLE-SERVICE and SINGLE-USE ARTICLES and:

- (A) After touching bare human body parts other than clean hands and clean, exposed portions of arms;
- (B) After using the toilet room;
- (C) After caring for or handling SERVICE ANIMALS or aquatic animals as specified in ¶ 2-403.11(B);
- (D) Except as specified in ¶ 2-401.11(B), after coughing, sneezing, using a handkerchief or disposable tissue, using tobacco, eating, or drinking;
- (E) After handling soiled EQUIPMENT or UTENSILS;
- (F) During FOOD preparation, as often as necessary to remove soil and contamination and to prevent cross contamination when changing tasks;
- (G) When switching between working with raw FOOD and working with READY-TO-EAT FOOD;
- (H) Before donning gloves to initiate a task that involves working with FOOD; and
- (I) After engaging in other activities that contaminate the hands.

3-304.15(A) Gloves, Use Limitation - If used, SINGLE-USE gloves shall be used for only one task such as working with READY-TO-EAT FOOD or with raw animal FOOD, used for no other purpose, and discarded when damaged or soiled, or when interruptions occur in the operation.

Discussion of interpretations

Question/Issue:

Jar and spoon condiment containers (for condiments such as chili paste, mustards, relishes, etc.) that are left in self-serve areas to be taken to dining tables or left on dining tables from seating to seating do not meet the intent of the 2013 FDA Food Code. Please see images below:



Response:

Jar and spoon condiment containers are not allowed and will be written up as a violation, since they do not meet the definition of narrow-neck bottles. Single serve container is ok.

Code Reference: 3-306.14(B1) Food Protected from Contamination

Violation(s): (3-306.14 B1) *The FOOD is dispensed so that it is protected from contamination and the container is closed between uses, such as a narrow-neck bottle containing catsup, steak sauce, or wine;*

Note: *we will be working with the Chinese restaurant association and also with the major players to get the word out to them about this change. Liaisons will be creating handout with this info.*

Question/Issue:

Tapioca pearls, otherwise known as Boba, are they being considered a TCS product?

Response:

Since tapioca pearls are plant derived it is considered a TCS food. Tapioca pearls usually come in as a dehydrated product, at this point it is non TCS food. When it is rehydrated at the establishment then it becomes TCS Time as a Control can be offered as needed. If the establishment(s) claims that their boba is a non TCS product, then they must provide proof to show that.

Code Reference: 3-502.16

Inspector tip: *Time/Temperature Control for Food Safety Food shall be held at 41°F or less*

Vomit/Fecal Accident Guidelines (Follow-up)

Question/Issue:

Discussion was had at the last Standards Committee meeting in January about implementation of this new 2013 FDA Food Code requirement. It was decided more information needed to be disseminated to stakeholders. Discussion will be had on how inspectors are to be documenting the violation, what questions inspectors can ask to assess compliance, and what documentation would be sufficient for an establishment to be in compliance with the code requirement.

Response:

A violation should be documented if an establishment does not have procedures for employees to follow when responding to vomiting or diarrheal events as described in 2-501-11. Information was sent out in the last EnviroConnection newsletter and guidelines were placed on our website, as recommended in the last meeting. The procedure does not have to be in writing – as long as all of their employees are familiar with what to do or where to get the information.

Inspector Tip: Some establishments have a “blood borne Pathogens/hazardous material” clean-up kit and this kit may have information on vomit/fecal cleanup. Inspectors should ask about this kit. The

establishment does not need to open the kit (even if the instructions are inside the kit), as long as they have it and know what it can be used for.

Code Reference: 2-501.11

Violation(s): A FOOD ESTABLISHMENT shall have procedures for EMPLOYEES to follow when responding to vomiting or diarrheal events that involve the discharge of vomitus or fecal matter onto surfaces in the FOOD ESTABLISHMENT. The procedures shall address the specific actions EMPLOYEES must take to minimize the spread of contamination and the exposure of EMPLOYEES, consumers, FOOD, and surfaces to vomitus or fecal matter.

Maricopa County Services Department

Working with our community to ensure a safe and healthy environment

Please [subscribe](#) if you would like to receive future agendas directly to your Inbox.