



Maricopa County

Environmental Services

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TOPIC: Guidance for standardizing violations documented for wiping cloths and sanitizing solutions associated with the use of wiping cloths.

BACKGROUND: This tip is a refresher and update from a tip of the week on this topic from 2005. The use of moist wiping cloths to sanitize food contact surfaces in food establishments is a common practice. There are several scenarios that the EH Specialist will see such as cloths left out of the sanitizing solution bucket, unlabelled sanitizer buckets and sanitizer concentrations that are either too high or too low. Another scenario is the improper use of a wiping cloth with a food contact surface resulting in the potential for cross contamination of RTE foods.

SCENARIOS (most often observed):

19C: (3-304.11) {10 points} Food contact surfaces have not been cleaned and sanitized prior to use. Example:

- A food contact surface such as a cutting board is wiped off using a moist wiping cloth which is not at the proper sanitizer concentration. The cutting board is subsequently used once again for food preparation. The key here is the observation of food in contact with the food contact surface of the utensil or equipment.

21B: (4-701.10/4-702.11) {5 points} Utensils and food contact surfaces of equipment not sanitized before use AFTER cleaning.

- A food contact surface such as a cutting board simply washed and rinsed but not sanitized prior to use. This refers to the cutting board not being sanitized after cleaning with the intent of it being used for food preparation.

21C: (4-501.114 A-Chlorine; B-Iodine; C-Quats) {5 points} Chemical sanitizer not at proper concentration. Examples:

- Sanitizer solutions for wiping cloths that is lower than the acceptable range.
- Sanitizer solutions that is higher than the acceptable range.

FDA Guidance: Sanitizers can work well in a wide range of temperatures and pH concentrations. Since operators do not have good knowledge of pH and we do not commonly test the pH of these concentrations we rely on sanitizer test strips to check the range of concentration. If there is any doubt about the proper concentration for a specific sanitizer check the product label. This will be most applicable for Quats and Iodine. If the EH Specialist determines that the operator is not following the directions on the label they are in violation of Federal Law (4-501.114 E). Violation 21C still applies.

28C: (7-102.11) {5 points} Toxic materials not properly labeled. Examples:

- An unlabeled sanitizer bucket.

FDA Guidance: The labeling provision applies not only to original containers of sanitizers/chemicals but also to "working containers". The sanitizer buckets in food service operations are working containers.

C2: (3-304.14) {1 point} Cloths in use for wiping spills are not stored in a sanitizer solution of proper concentration and/or are used for other purposes. Examples:

- A moist wiping cloth (with sanitizer residual) that is left on a counter or other area outside the sanitizing solution.
- A moist wiping cloth that is used for wiping a non-food contact surface and subsequently a food-contact surface.
- Moist or dry wiping cloths that are used for raw animal foods are subsequently used for a different purpose.
- A moist wiping cloth used for raw animal food and is not kept in a separate sanitizing solution from cloths used for other purposes.
- A soiled wiping cloth.
- Soiled/dirty sanitizing solution for wiping cloths.

SPECIAL NOTE: The food establishment does not have any sanitizer solution for wiping cloths set up at the time of inspection. THIS IS NOT A VIOLATION. The EH Specialist shall then ask the PIC if wiping cloths are used in their establishment. If so, have the establishment make a fresh solution that can be checked.

POINTS TO PONDER: The EH Specialist should be aware of the proper use of wiping cloths to prevent cross contamination and the scenarios in which their use shall be deemed inadequate. Any assessment should begin with identifying the "Hazard of Concern". For example, anytime raw animal products are used on a food contact surface such as a cutting board or slicing machine the operator cannot just use a wiping cloth to now prep RTE's such as chopping lettuce on the same board. The hazard of concern with raw animal foods would be vegetative pathogens such as Salmonella. In this case, the cutting board must be washed-rinsed-sanitized prior to switching to produce.

Think of another scenario. The operator has color-coded cutting boards and uses only green boards for cutting produce. The idea of color coded cutting boards is to eliminate cross contamination issues note in our first scenario. Is there a hazard of concern? The answer is yes but to a smaller degree. The hazard of concern once again is vegetative pathogens. However, it is less likely that produce would accumulate as many such pathogens in comparison to raw animal products. As a result, the intermittent use of a wiping cloth to sanitize the cutting board would suffice.

Let's look at one last scenario. In a deli an employee is using a meat slicer for processed meats. The hazard of concern would be Listeria. The code allows the use of the slicer for four hours before it needs to be thoroughly broken down and washed-rinsed-sanitized. The intermittent use of a wiping cloth to sanitize the meat slicer within the four hour period is sufficient to reduce the possible bacterial load.

There are many other scenarios. Once again think about the hazard of concern. If you have a question, please consult the training team.