Task Group on Warewashing Equipment  
Teleconference Meeting Summary  
April 26, 2007

Participants
Joel Hipp and Zane Michael (Hobart Corp), Jim Whitehead and Kirk Northcut (Auto-Chlor Systems), Tony Gagliardi (Forsyth Co. Health Department), Rick Yanez (Knight Equipment.), Wilbur Haag (A.O. Smith Water Products Co.), Joseph (Dema Engineering Company), Michael Belleville (CMA Dishmachines), Adrian Hartz (Ecolab, Inc.), Mike Kohler, & Lorna Badman (NSF).

Discussion
L. Badman read the antitrust statement.  J. Hipp welcomed everyone.  J. Hipp read the following excerpt from the March 2007 Meeting Summary:

C.  Potable water rinse (FE-2007-10)
It is being recommended that a post sanitizing rinse be added for warewashing equipment to allow hot dishes to be handled sooner or to remove the chemical sanitizer.  This rinse would be cool potable water.  An option would be available to turn off the post sanitizing rinse. Concerns were raised over the additional water usage, drying time of the ware, sanitizer concentration measurement by the operator and slip hazard in kitchen.  The post sanitizing rinse uses only 20% of the water from the final rinse.  Sanitization occurs in 7 to 10 seconds, diluting of the sanitizer in the post sanitizing rinse will not affect the inactivation of the microbes.

Motion: Accept proposal as written in FE-2007-10.  T. Johnson moved. D. Bottens seconded

Discussion: This is a move backwards from the existing standards.  The rinse is potable water used strictly for cooling.  As proposed, this would be in conflict with the Food Code.  The Conference would need to be approached and agree with the proposal.

12 members were in favor of the motion and 7 members were opposed.

J. Hipp then read R. Payzant (American Dish Service) concerns, which were similar to the issues raised at the JC meeting.  The following is an excerpt from R. Payzant’s e-mail:

The comments from the owners of American Dish Service are that they do not feel a potable water post rinse is in the spirit of conservational designs.  Also, it seems that testing would be needed to determine the impact on the loss of post sanitizing seconds in calculating the HUE requirement.  Regardless of the pro and cons, it was felt that changing the standard to include potable water rinse implies that NSF #3 promotes the increase of water usage.  It was not understood how such an additional water feature would benefit the advancement of water saving
or what it might offer the enduser in compensation for the increased cost. Thank you for letting us comment.

R. Payzant’s comments regarding the spirit of conservational design and usage is outside of the scope of NSF/ANSI 3. The Standard addresses the public health safety of the equipment. The potable water rinse would be an option for manufacturers to install on machines. The Machine would still need to meet the requirements of NSF/ANSI 3. This proposed change is not promoting increased water usage, it will only be an option on machines. The Energy Star work might help to address this concern and it is outside of the scope of NSF International.

The Regulatory Sector of the Joint Committee had several concerns, which include, drying time of ware, non-compliance with the Food Code and State Codes, and the potable rinse not always using potable water.

Sanitizers or hot water can be used to disinfect the ware. The sanitizers are registered with the EPA office of Pesticides and require the sanitizer to air dry (the label does not specify the time needed to allow the sanitizer to air dry). The sanitizer needs to be used according to the manufacturer’s recommendations. These requirements are in conflict the requirements in the Food Code (7-204-11¶4-703). The sanitizer is applied for 7 to 10 seconds (not 30 seconds) and then lays on the surface of the ware while it is air drying. The Food Code requires ware to be air dried (4-501.114). However the Food Code does not specifically exclude a potable water rinse. The CFP will need to address the issue.

CFR 21 173.325 allows a potable water rinse for produce with a 24 hr holding period after the rinse. The rinse is allowed to remove the residual of the sanitizer for toxicity reasons.

Research needs to be completed to determine if sanitizers exist that do not require air drying. If a proposal was submitted for a potable water rinse and could demonstrate a 5 – log kill, would this address EPA’s concern?

Some members of the TG had the same concerns with the hot water rinse. With a hot water rinse, the water is elevated to ~180°, which allows the ware to dry quickly when taken out of the dish machine. A potable water rinse would be ~ 75° and ware would dry slower (some states might request the water to be warmer). Whether the rinse is warm or cool, the issue is space for drying the ware. There is limited space in a kitchen and a potable water rinse would require more space for drying the wares. Some kitchens utilize air circulating systems to help dry the ware.

Generally speaking, the TG members had less of a concern on a potable water rinse on a hot water sanitized ware vs a potable water rinse on a chemical sanitizer.

NSF does not want a NSF Standard to be in conflict with EPA or FDA codes.

The 3 main issues with the current proposal are:

1. Conflict with the EPA labeling requirement
2. Drying time of ware and space for drying the ware.
3. Conflict with the Food Code

Individual state codes lag behind the Food Code. Even if the code is changed to allow a potable water rinse, the states might not allow a potable rinse. The TG was reminded this was outside of the scope of the Standard but a good point had been made.

It was suggested that labeling be included for potable water rinse machines.

It was suggested to have the FDA present at the next teleconference.

NSF has been requested to use their contacts in the EPA to answer the following concern:

Does the EPA have an issue if a post sanitizing potable water rinse is used after a sanitizer if a 5-log kill is achieved? Would this be a conflict with the EPA labeling for a sanitizer?