

**Conference for Food Protection  
2016 Issue Form**

**Issue: 2016 I-042**

<b>Council Recommendation:</b>	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
<b>Delegate Action:</b>	Accepted _____	Rejected _____	

*All information above the line is for conference use only.*

---

**Issue History:**

This is a brand new Issue.

**Title:**

Towel Drying Exception For Equipment Removed From High-Temp Dish Machines

**Issue you would like the Conference to consider:**

Wet stacking of equipment and utensils is a common issue and cause of concern in many food service establishments. Most facilities lack the space or time to adequately air dry utensils and equipment; therefore, stacking items while wet is frequently observed.

Single-use disposable towels, if used and stored appropriately, are sanitary. A single-use disposable towel could be used to dry equipment and then be discarded. Towel drying would also give the employee another chance to discern whether the items may need to be rewashed.

**Public Health Significance:**

Wet stacking prevents equipment from drying and increases the potential for bacterial growth. When food particles are not sufficiently removed in the washing process, the equipment, utensils, and food contact surfaces stacked wet support the growth of microorganisms, thus risking the public's health.

When utilizing a high-temperature sanitizing warewashing machine that reaches a temperature of at least 71°C(165°F) for a stationary rack warewashing machine or 82°C(180°F) for all other mechanical hot water sanitizing machines, the final rinse of the high temperature sanitizing warewashing machine should not exceed 90°C(194°F). If the high temperature sanitizing warewashing machine is operating according to manufacturer's specifications, and temperature limits have been met according to 4-501.112 to ensure surfaces of multiuse utensils and equipment accumulate enough heat to destroy pathogens, then single-use disposable towels used to remove remaining moisture should not pose a public health risk.

**Recommended Solution: The Conference recommends...:**

that a letter be sent to the FDA recommending the 2013 Food Code be amended as follows (language to be added is underlined; language to be deleted is in strikethrough format):

[4-901.11] Equipment and utensils, ~~Air-drying required,~~ Drying

After cleaning and sanitizing, equipment and utensils:

(A) Shall be air-dried or used after adequate draining as specified in the first paragraph of 40 CFR 180.940 Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations (food-contact surface sanitizing solutions), before contact with food. Stacking of wet items shall be prohibited; *OR*

(B) May not be cloth dried except that UTENSILS have been air-dried may be polished with cloths that are maintained clean and dry, *OR*

(C) May be hand-dried using individual, single-use disposable towels after removal from a high-temperature sanitizing warewashing machine operated as specified under 4-501.112

**Submitter Information 1:**

Name: Megan Calahan  
Organization: Tulsa City-County Health Department  
Address: 5051 S 129th E Ave  
City/State/Zip: Tulsa, OK 74134  
Telephone: 918-595-4311  
E-mail: mcalahan@tulsa-health.org

**Submitter Information 2:**

Name: DeBrena Hilton  
Organization: Tulsa City-County Health Department  
Address: 5051 S 129th E Ave  
City/State/Zip: Tulsa, OK 74134  
Telephone: 918-595-4302  
E-mail: dhilton@tulsa-health.org

*It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.*