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Ohio Department of Agriculture & Ohio Department of Health



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• LETTER OF OPINION •

To: Health Commissioners, Environmental Health Directors, Nursing Directors, ODA Food Safety Specialists, and Other Interested Parties

Subject: LETTER OF OPINION #2002-02

Date: January 23, 2002

Media Contact: [Paul Panico](#), ODA Chief of [Food Safety](#), (614) 728-6250

Warewashing Machines, Sanitizer Level Indicator

This "Letter of Opinion" was reviewed and recommended by the [Retail Food Safety Advisory Council](#) at their January 23, 2002 meeting.

The Ohio Administrative Code (OAC) section 3717-1-04.1(DD) states "A warewashing machine that uses a chemical for sanitization and that is installed after adoption of this chapter, shall be equipped with a device that indicates audibly or visually when more chemical sanitizer needs to be added." This section of the *Ohio Uniform Food Safety Code* is consistent with the 1999 *U.S. Food and Drug Administration (FDA) Food Code*.

Currently, an National Sanitation Foundation approved machine may not meet this section of the food code. The American National Standard Institute (ANSI)/ National Sanitation Foundation International (NSF) Standard for Food Equipment Standard 3 for Commercial Spray-Type Dishwashing and Glasswashing Machines requires, that if provided by the manufacturer, a chemical feeder is to conform to ANSI/NSF Standard 29 "Detergent and Chemical Feeders for Commercial Spray-type Dishwashing Machines." If the feeder is not provided, the manufacturer must provide information needed to identify and install an appropriate and functional chemical feeder. It is the ANSI/NSF Standard 29 that states "an obvious method (visual or audible, or both) to indicate the delivery and supply of the solution shall be provided. A flow indicating device, open air delivery of chemical, or similar easily discernible method shall be acceptable."

At the present time, some dishwashers are designed with open air delivery of the sanitizer while others are provided with a clear sight tube in order to comply with the standard. Although both are consistent with NSF Standards, FDA considers that the sight tube does not meet the intent of the code in alerting the operator of the lack of sanitizer injection into the final rinse cycle (It is not discernable if sanitizer is entering the machine, only that sanitizer is in the injection line).

It is our understanding that some manufacturers are currently developing devices that will meet the intent of the code. The issue will also be considered at the 2002 Conference for Food Protection. Until manufacturers' technology meets the intent of the code or this issue is otherwise resolved at the national level, it is our opinion that restraint should be applied in enforcement of this section of the code.

If you have any questions regarding this matter, please contact the Ohio Department of Agriculture, Division of Food Safety or the Ohio Department of Health, Bureau of Environmental Health.