



## Retail Cooling: Beyond the Code

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- Improper cooling of hot foods is a significant cause of outbreaks
  - Nationally 10% of outbreaks cooling too slow identified as top contributing factor
  - 10% outbreaks in Minnesota are bacterial intoxications
- Even with current code requirements for cooling, restaurants are struggling.
  - FDA Risk Factor study 78% restaurants were failing

# Cooling is Difficult

- Requires extensive monitoring over a six-hour period
- Restaurants are a dynamic setting and difficult to monitor times and temps
- Multiple method options for cooling, varying results of success
- Inspectors have a hard time verifying if proper cooling occurred

# You can't inspect what you can't see

Minneapolis (3,532 inspections):

- 71.4% routine inspections cooling was “not observed”
- 15.1% out of compliance

MDH (42,000 inspections):

- 82% of routine inspections cooling was “not observed”
- 20% out of compliance

Violation  
Called More

● **Cooling  
Requirements**

●  
Date mark house-  
made foods

●  
Shellfish  
tags system

●  
Hot holding

●  
Parasite  
destruction letter

●  
Discard foods  
over 7 day date  
mark

●  
Reheat previously  
cooked foods

●  
Date mark  
commercial  
foods

Violation  
Called Less

●  
Cook shell  
eggs to 145

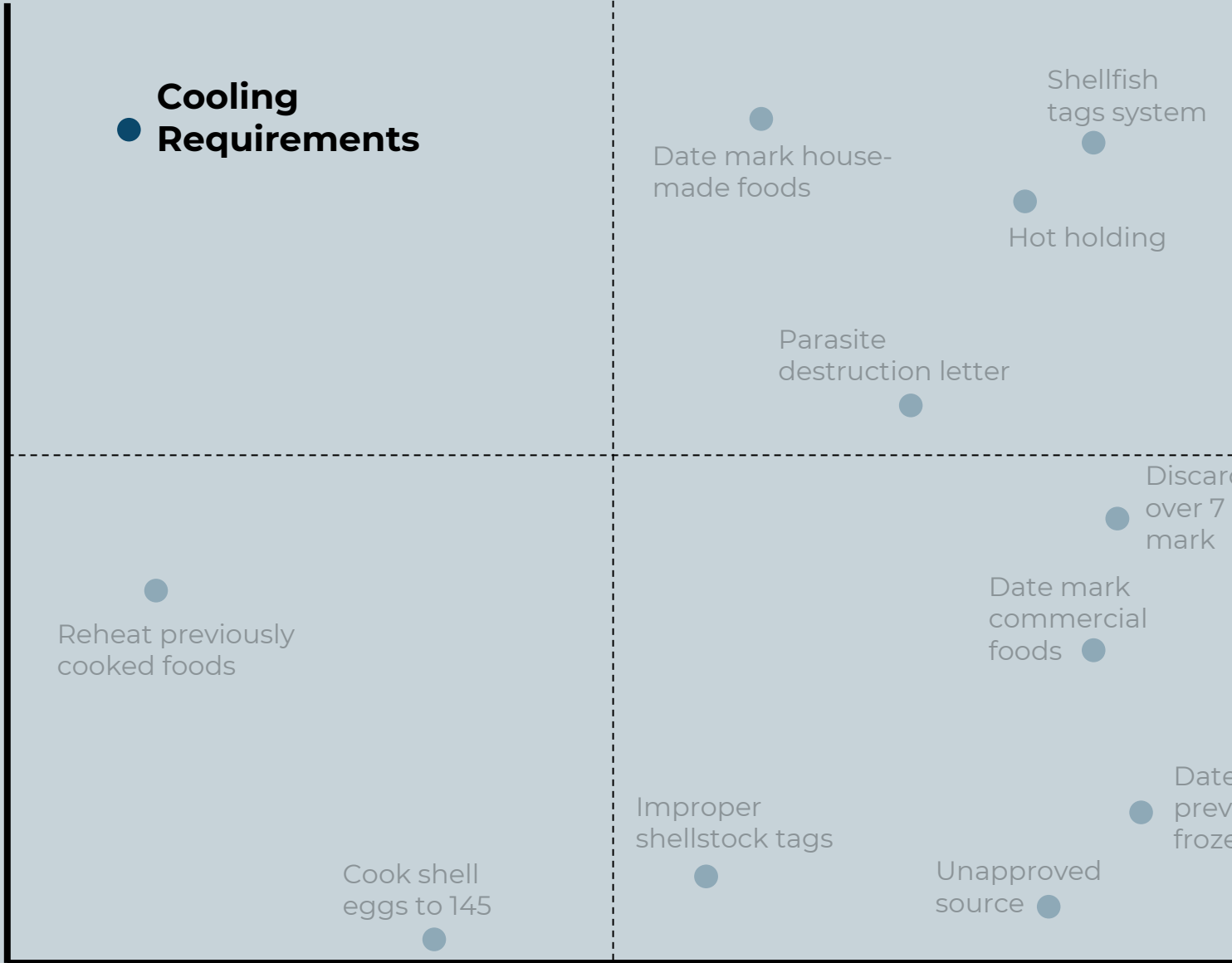
●  
Improper  
shellstock tags

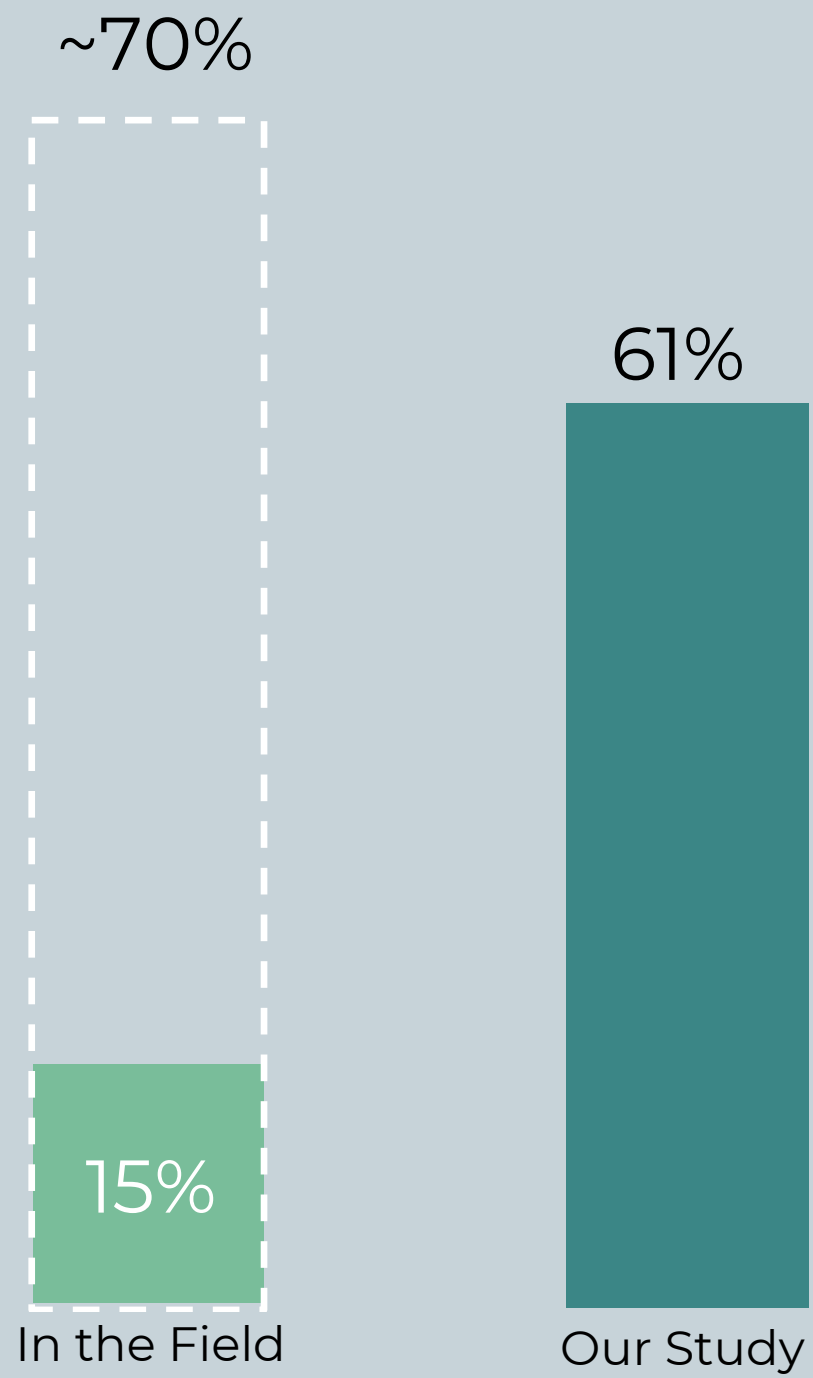
●  
Unapproved  
source

●  
Date mark  
previously  
frozen foods

Observed Less

Observed More





The basis for determining IN or OUT of compliance can also be supported through discussion and/or record review which would provide the inspector reliable data of the “start time” for cooling.


Not too  
long ago...

Maybe an  
hour...

## Cooling Log


The total cooling time for time/temperature control for safety (TCS) foods may not exceed 6 hours.








TCS foods must be cooled from 135 °F to 70 °F WITHIN 2 hours, and from 70 °F to 41 °F WITHIN the remaining 4 hours.

  
Check TCS food temperatures  
BEFORE 2 hour limit and  
BEFORE 6 hour limit.

  
TCS foods may be reheated to  
165°F ONLY if reheating is done  
before 2 hours.

  
After 2 hours, TCS foods not cooled to 70°F  
must be discarded to prevent foodborne  
illness from spore-forming bacteria.

  
TCS foods which do not  
cool to 41°F or below in  
6 hours must be  
discarded to prevent  
foodborne illness.

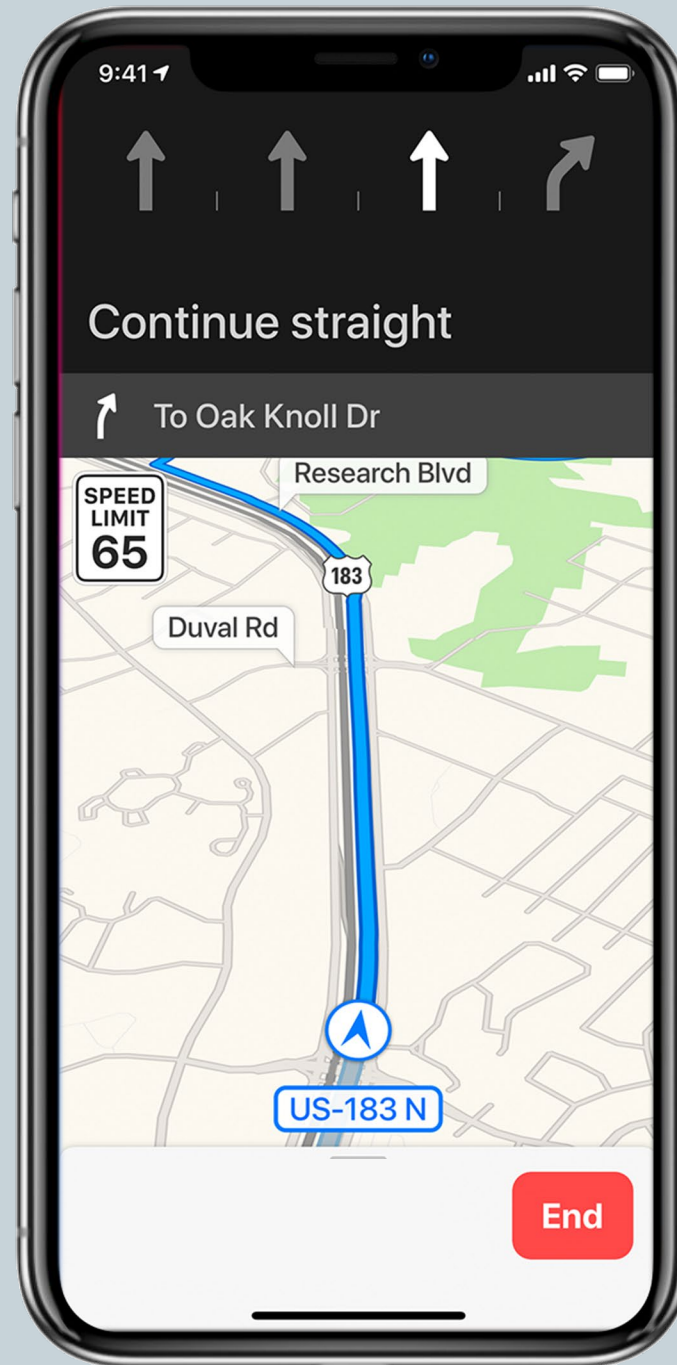
| Date  | Food | Cooling Temps<br>BEFORE 135°F<br>↓ | Time Food is<br>135 °F<br> | 135°F - 70°F within<br>2 hours  |                                       | Correct-<br>Reheat<br> | 70°F - 41°F within 4 hours  |   |   |                                       | Correct-<br>Discard<br> | Initials | Verified<br>By /<br>Date |
|-------|------|------------------------------------|---|---|---------------------------------------|---|---|---|---|---------------------------------------|--|----------|--------------------------|
|       |      |                                    |   | 1 Hour<br> | 2 Hour<br>must be<br>70°F or<br>lower |   | 3 Hour<br> | 4 Hour<br> | 5 Hour<br> | 6 Hour<br>must be<br>41°F or<br>lower |  |          |                          |
| 1-Jun | RICE | 192°, 167°, 151°                   | time: 2:10<br>temp: 135°  | 3:10<br>84°   | 4:10<br>62°                           | none<br>needed  | 5:10<br>55°   | 6:10<br>47°   | 7:10<br>43°   | 8:10<br>39°                           | none<br>needed   | L.P.     | S.N.<br>1 Jun            |
|       |      |                                    | time:<br>temp 135°  |   |                                       |   |   |   |   |                                       |  |          |                          |
|       |      |                                    | time:<br>temp 135°  |   |                                       |   |   |   |   |                                       |  |          |                          |
|       |      |                                    | time:<br>temp 135°  |   |                                       |   |   |   |   |                                       |  |          |                          |
|       |      |                                    | time:<br>temp 135°  |   |                                       |   |   |   |   |                                       |  |          |                          |

Cooling Methods: Ice bath Ice wands Metal containers Stirring Food in shallow pans Add ice to food



3-501.15A Cooling must be accomplished according to the time and temperature criteria in part [4626.0385](#) by using one or more of the following methods based on the type of food being cooled:

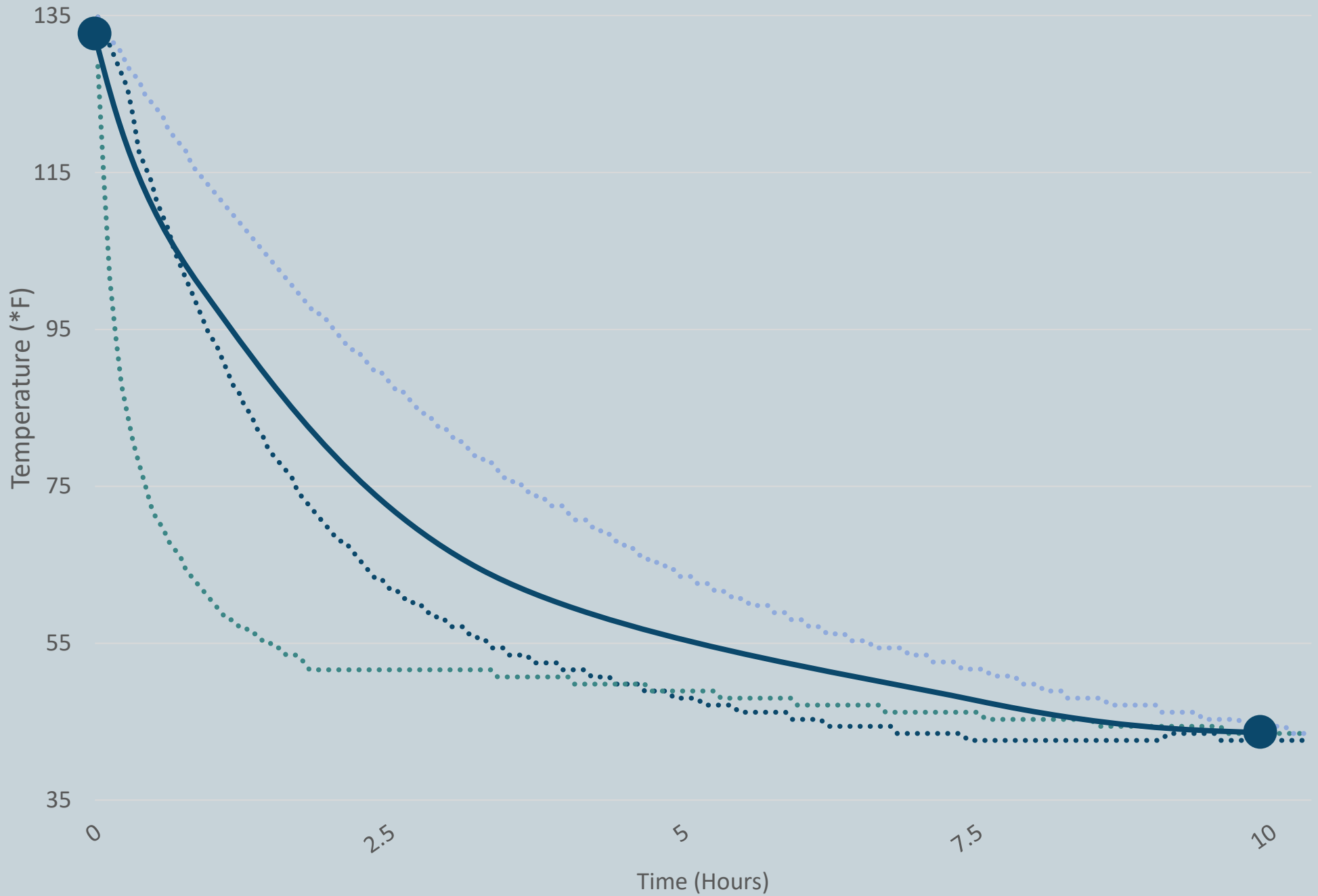
- (1) placing the food in **shallow** pans;<sub>P2</sub>
- (2) separating the food into **smaller** or **thinner** portions;<sub>P2</sub>
- (3) using **rapid cooling equipment**;<sub>P2</sub>
- (4) stirring the food in a container placed in an ice water bath;<sub>P2</sub>
- (5) using **containers that facilitate** heat transfer;<sub>P2</sub>
- (6) adding ice as an ingredient;<sub>P2</sub> or
- (7) **other** effective methods.<sub>P2</sub>





## EHS Net Study

“Quantitative Data Analysis To  
Determine Best Food Cooling  
Practices in U.S. Restaurants”  
Schaffner, Hedeem, et al., 2013





|  |                      |   |                      |
|--|----------------------|---|----------------------|
| Type of Cooling Unit                   | <input type="text"/> | Container Type<br>(Metal or Plastic)          | <input type="text"/> |
| Covered? (Yes, No, Partial)            | <input type="text"/> | Mixed? **                                     | <input type="text"/> |
| Ice as Ingredient?<br>**               | <input type="text"/> | 2 Inch Air Gap?                               | <input type="text"/> |
| Ice Wand<br>Used? **                   | <input type="text"/> | If so, used correctly?                        | <input type="text"/> |
| Ice Bath<br>Used? **                   | <input type="text"/> | If so, used correctly?                        | <input type="text"/> |
| Substance<br>(Solid or<br>Liquid)      | <input type="text"/> | If liquid, consistency?<br>(smooth or chunky) | <input type="text"/> |
| Food Depth<br>(In.)                    | <input type="text"/> | Surface Area (Sq. In.)                        | <input type="text"/> |
| Sample<br>Volume (mL)                  | <input type="text"/> | Sample Mass (g)                               | <input type="text"/> |
| Ambient Air<br>Temp of<br>Cooling Unit | <input type="text"/> |   |                      |

**\*\* No, Observed,  
or PIC COnfirmed**

Notes/  
Narrative

MINNICO

NSP

C  
b

K  
50

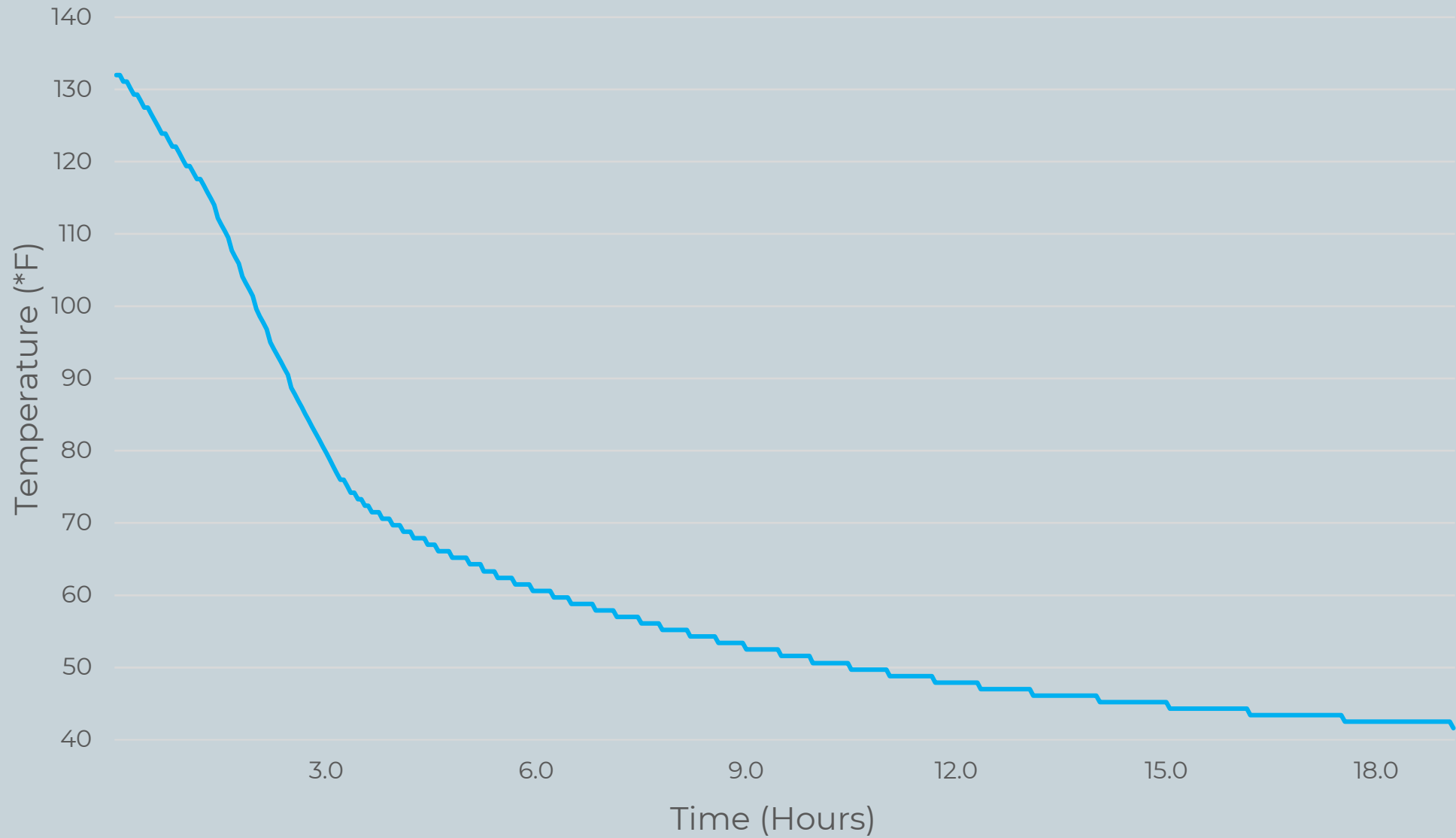




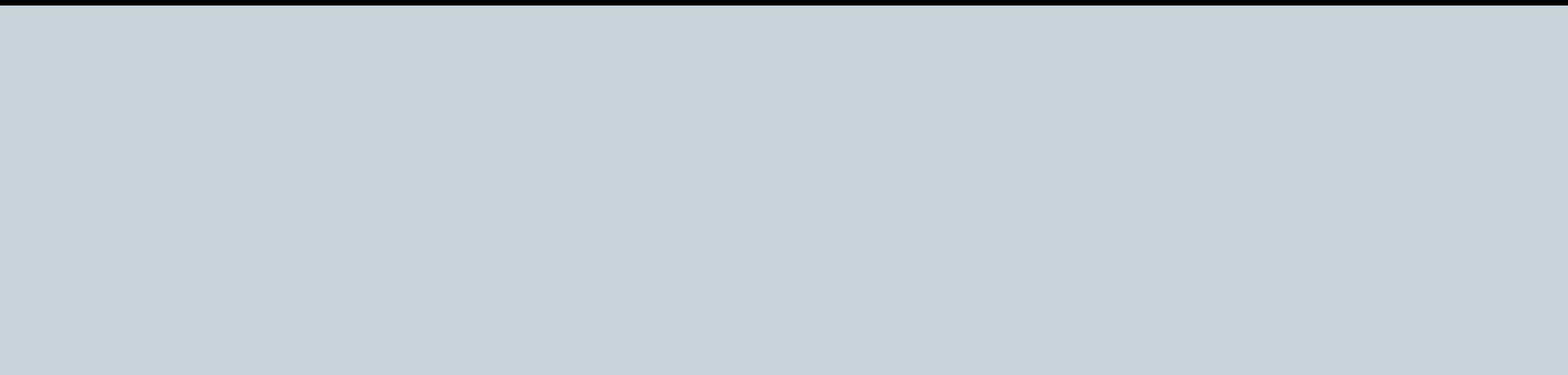
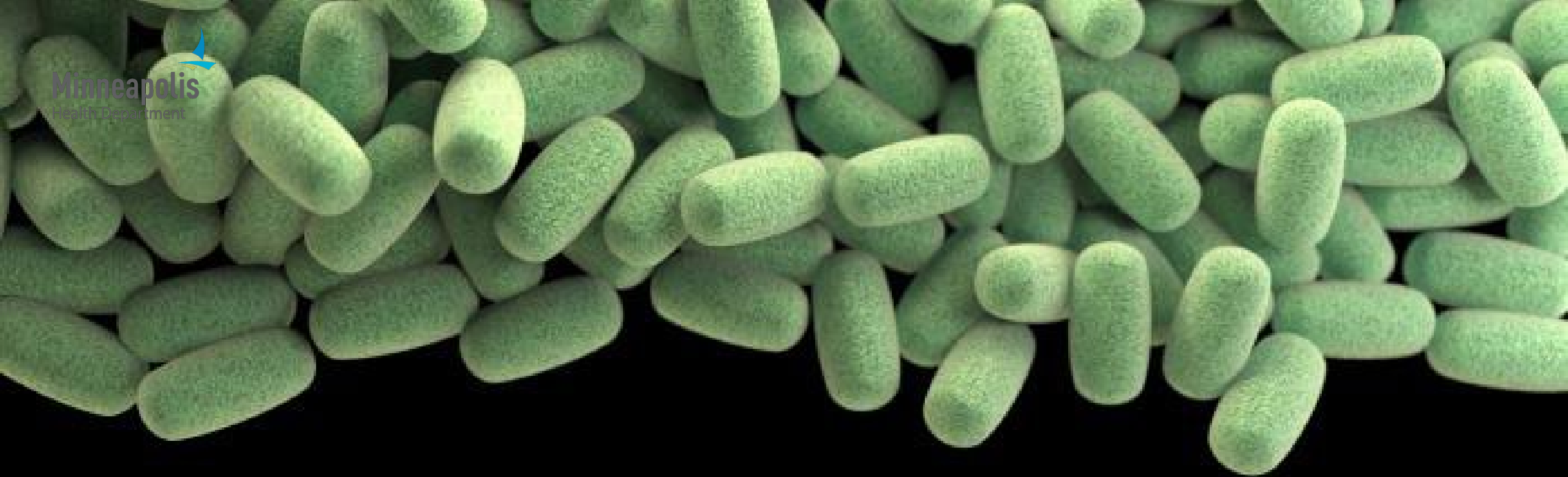




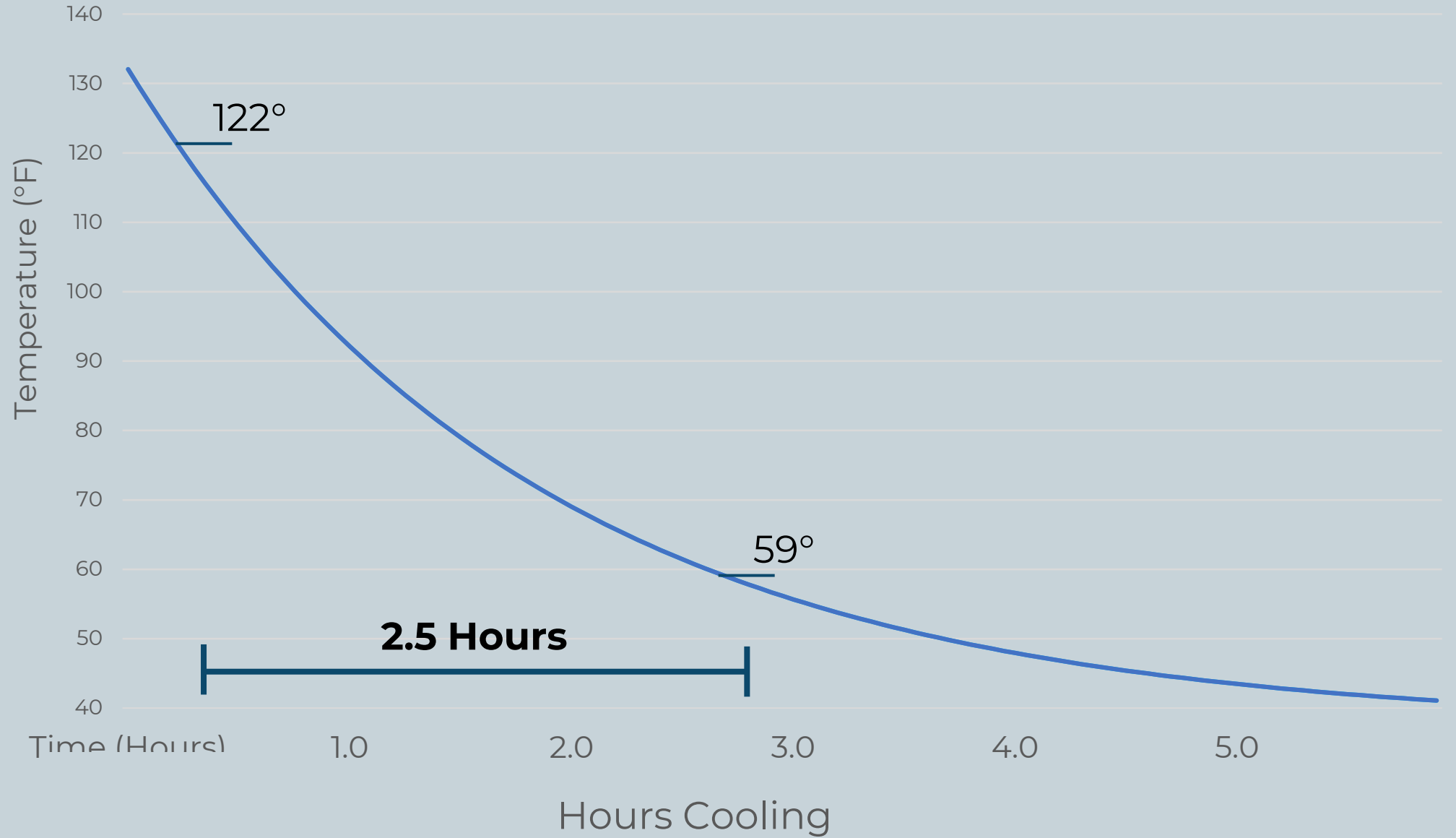
# Chicken Curry Cooling Curve

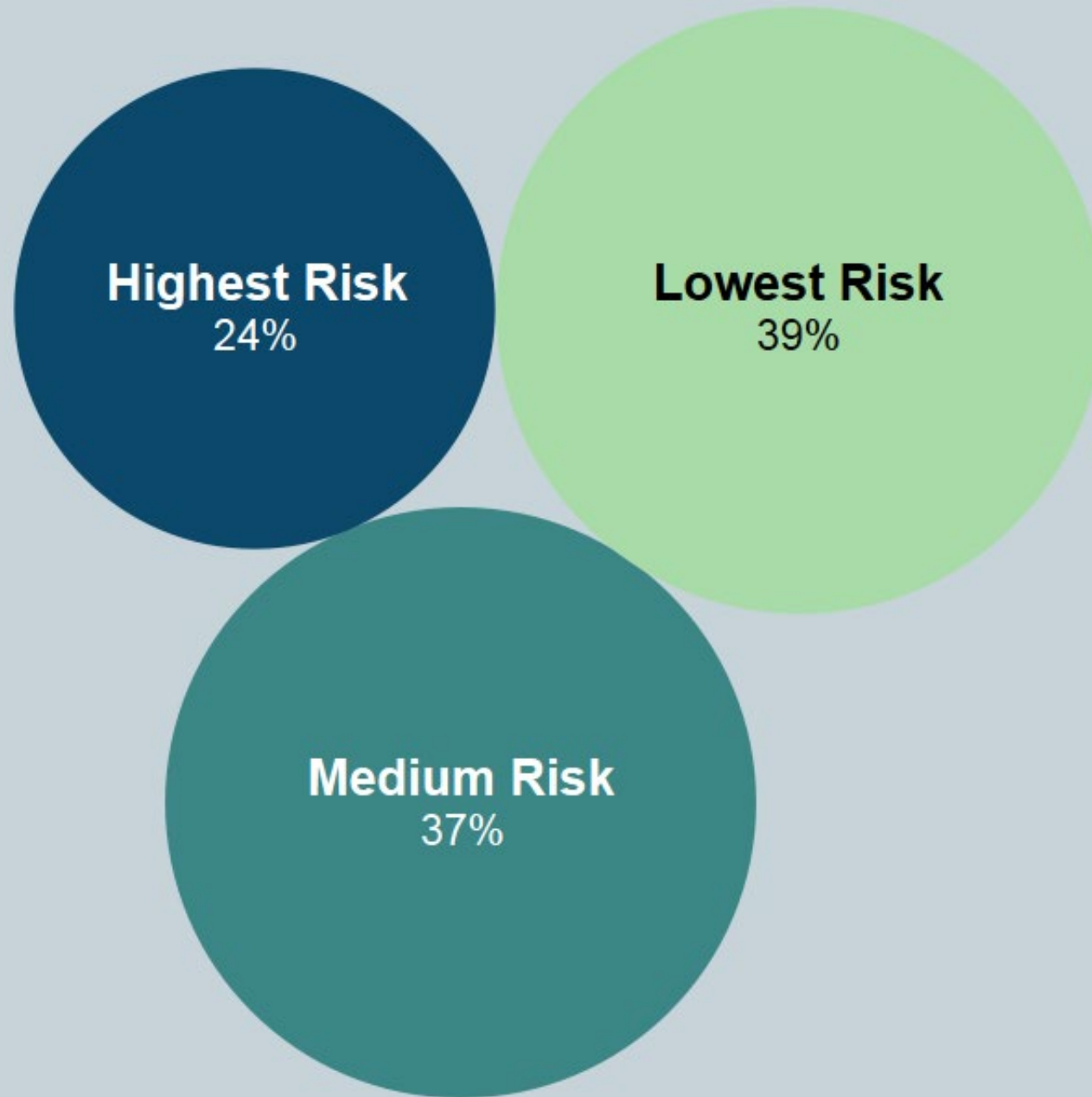


— Your Cooling Curve



# Food Code Minimum Required Cooling Curve





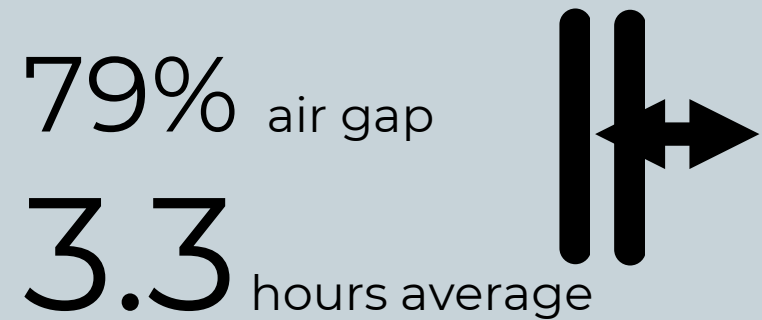
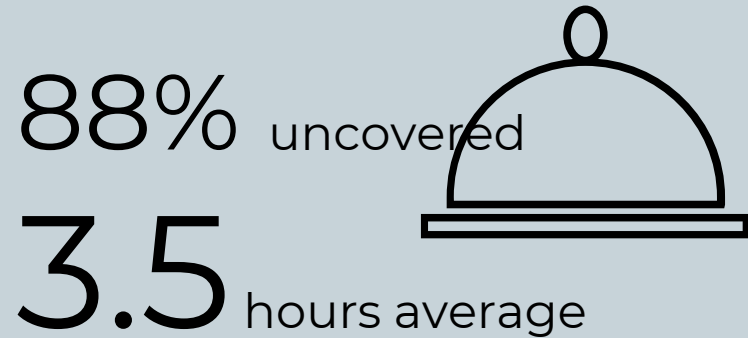
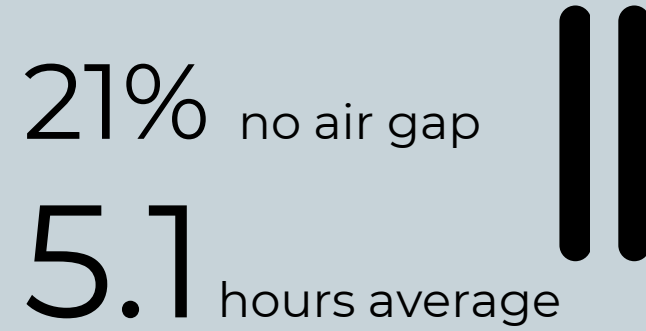
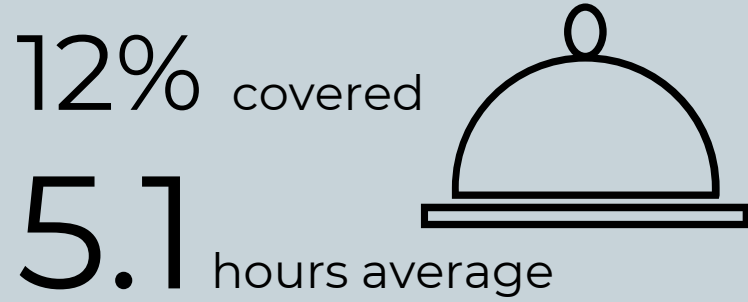
- Highest Risk  
>5 hours in high risk
- Medium-most Risk  
2.5-5 hours in high risk
- Lowest Risk  
<2.5 hours in high risk

## 3-501.15B (Cooling Methods Subpart B)

B. When placed in cooling or cold holding equipment, food containers in which food is being cooled must be:

- (1) arranged in the equipment to provide maximum heat transfer through the container walls; and
- (2) loosely covered or uncovered if protected from overhead contamination as specified in part [4626.0300](#), item A, subitem (2), during the cooling period to facilitate heat transfer from the surface of the food.

# 3-501.15B (Cover & Gap)





# Two Cooling Concepts



Passive  
65%



Active  
35%

# Summary of Passive Data

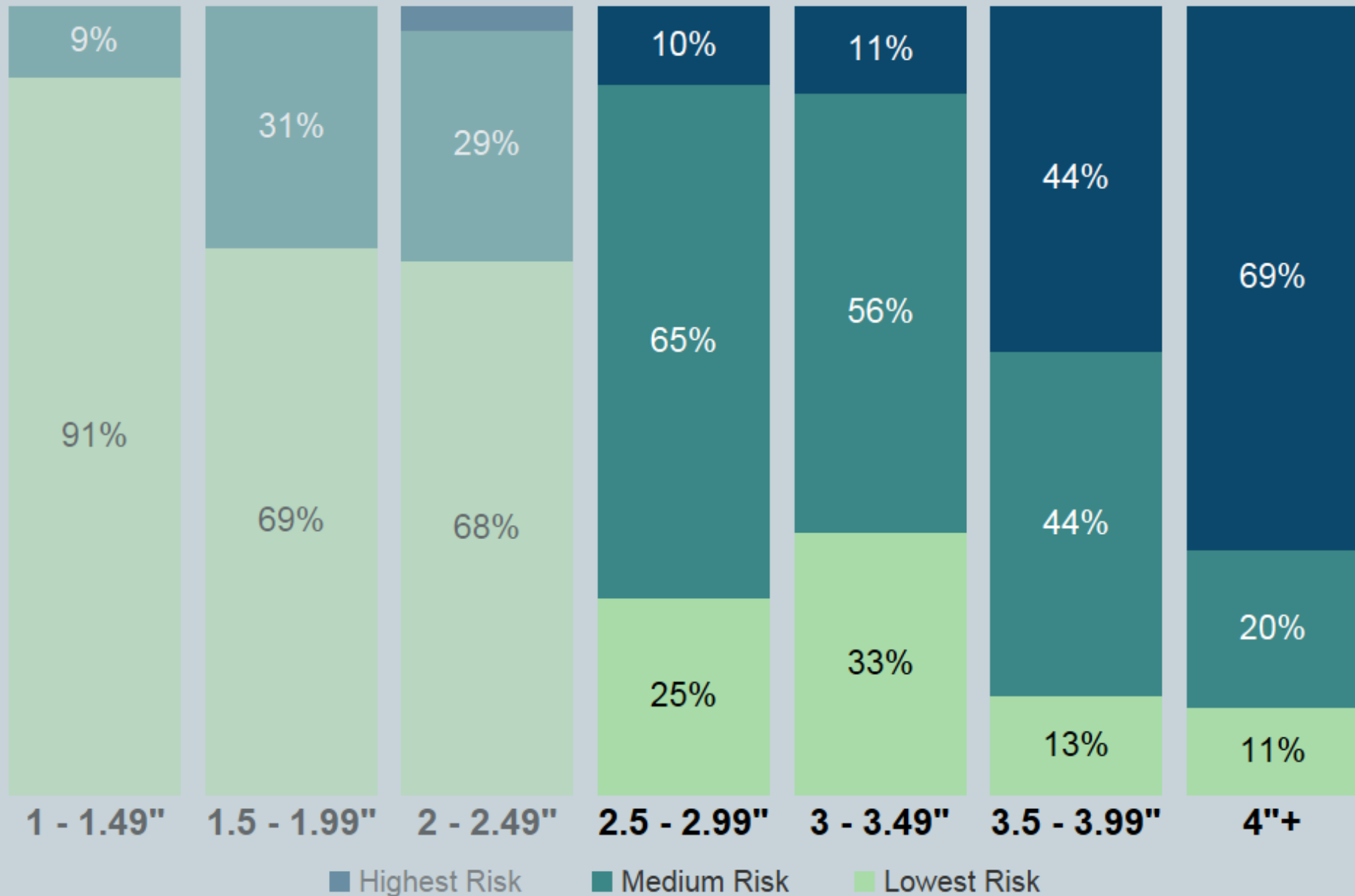
- It's popular
  - Minneapolis survey
  - Washington State risk factor
- 143 total curves
  - 76 Complete FDA cooling curves
  - 103 Complete *C. perfringens* growth range curves
- Industry already skews greatly to metal
- 36% filled to depths at or below 2 inches

# How is passive cooling regulated?

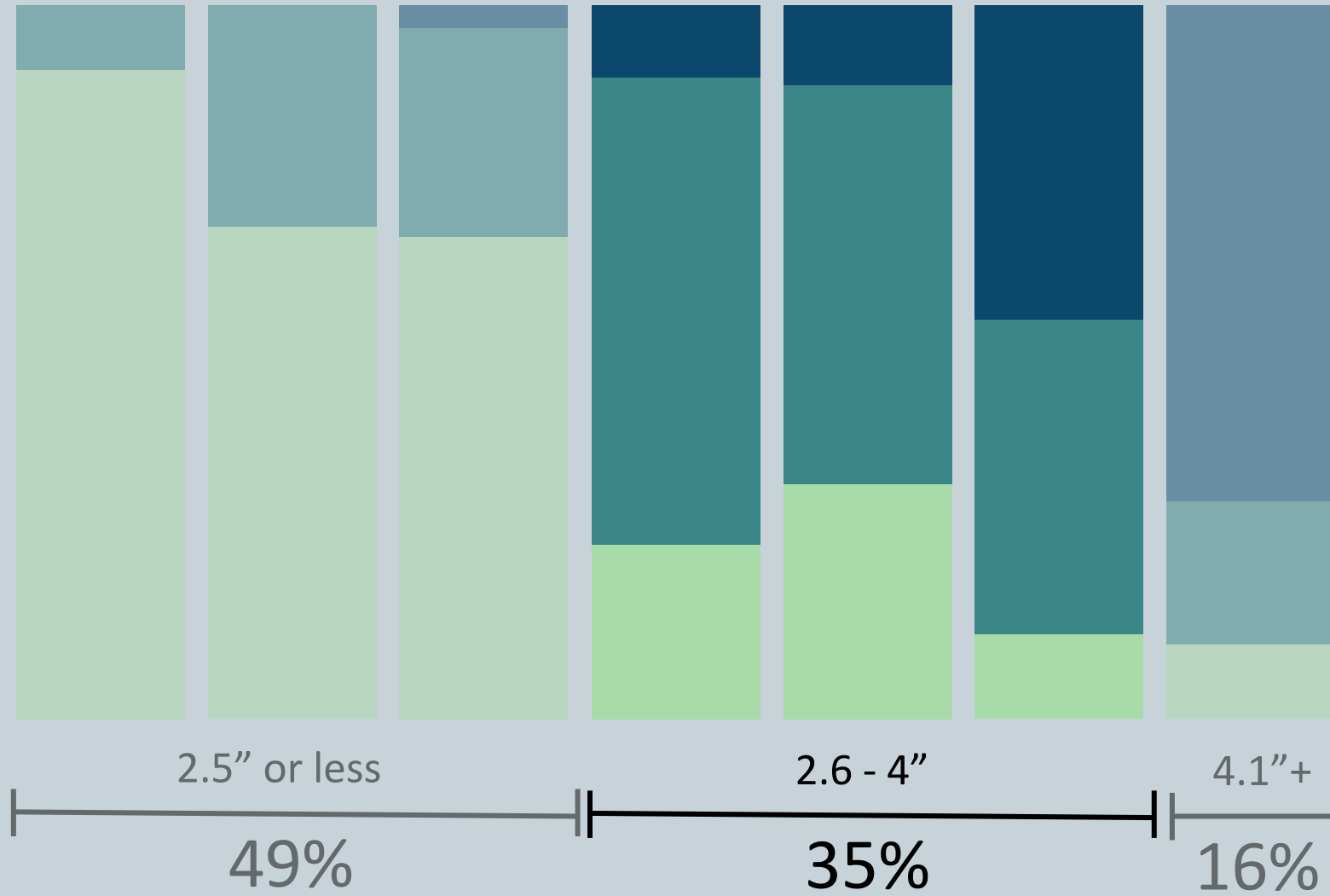
- Program Manager Survey
  - ~60% don't suggest a max fill depth
  - ~40% do suggest a max fill depth
  - **Equally distribution from 2-4 inches**
- Factsheet summary (multiple sources)
  - 66% suggest a max fill depth
  - 33% don't suggest a max fill depth
  - **Equally distribution from 2-4 inches**
- Everyone is guessing = dangerous consequences
  - 2 inches = very low risk, if any at all
  - 4 inches = Almost 90% failure rate and roughly 50% chance of double failure
  - **High occurrence rate = 50%!**

# Passive Technique and Fill

## Depth



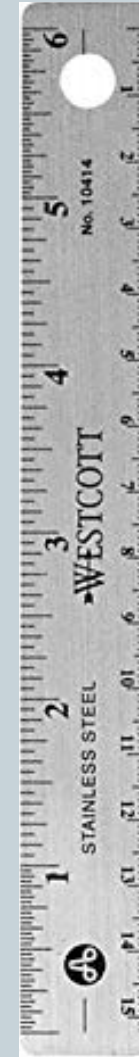
# Shallow Defined



9.2 Hours Avg. Cooling Time  
3.5 Hours Avg. High Risk Time  
88% Failure Rate

# Which Variables Matter?

- Required Variables (Subpart B reminder)
  - Uncovered = .646
  - Air Gap = .112
- Variables impacting passive technique
  - **Depth = .001**
  - Container Type = .629
  - Mixing = .798
  - Air Temperature = .305



# Washington as a Model

## 3-501.14 Cooling.

(A) Except as specified under (B) of this section, cooked TCS food must be cooled:

within 2 hours from 135 degrees F (57 degrees C) to 70 degrees F (21 degrees C);<sub>p1</sub> and

(2) within a total of 6 hours from 135 degrees F (57 degrees C) to 41 degrees F (5 degrees C) or less.<sub>p1</sub>

(B) As an alternative to the cooling provisions of subsection A of this section, cooked TCS food must be cooled at a depth of two inches or less, uncovered, in refrigerated equipment that maintains an ambient air temperature of 41 degrees F (5 degrees C).

# 2-inch Support

| Food Depth (Inches) | Perf predictor<br>Log Increase | Recipe                   |
|---------------------|--------------------------------|--------------------------|
| 2                   | <b>1.87</b>                    | <b>Sausage Gravy*</b>    |
| 2                   | 0.652                          | Garden Veggie Soup       |
| 2                   | 0.18                           | Chicken Curry            |
| 2                   | 0.081                          | Tomato Soup              |
| 2                   | 0.242                          | Corn Chowder             |
| 2                   | 0.479                          | Chorizo                  |
| 2                   | 0.028                          | Cherry Compote           |
| 2                   | 0.028                          | Black Beans              |
| 1.75                | 0.11                           | Chicken Rice             |
| 1.5                 | 0.02                           | Empanadas                |
| 1.5                 | 0.011                          | Ground Beef              |
| 1.5                 | 0.018                          | Mushroom Sauce           |
| 1.5                 | 0.013                          | Mushroom Sauce #2        |
| <b>1.5</b>          | <b>1.28</b>                    | <b>Shallow Kraut*</b>    |
| 1.5                 | 0.138                          | Marinara                 |
| 1.5                 | 0.202                          | Marinara                 |
| 1.5                 | 0.123                          | Au Jus                   |
| 1.5                 | 0.115                          | Cheese Sauce             |
| 1.5                 | 0.089                          | Squash Soup              |
| 1.5                 | 0.008                          | Butternut Squash<br>Soup |
| 1.5                 | 0.005                          | Mashed Potatoes          |
| 1.5                 | 0.004                          | Turkey Chili             |
| 1.5                 | 0.167                          | Refried Beans            |





# Cooling in Shallow Pans

The most effective method to cool food is in shallow pans. Fill the pan two inches deep or less.



## When cooling in a shallow pan:

- Fill the pan two inches deep or less.
- Keep food uncovered while it is cooling.
- Keep two inches of space around the pan.

[www.minneapolismn.gov/FoodSafety](http://www.minneapolismn.gov/FoodSafety)

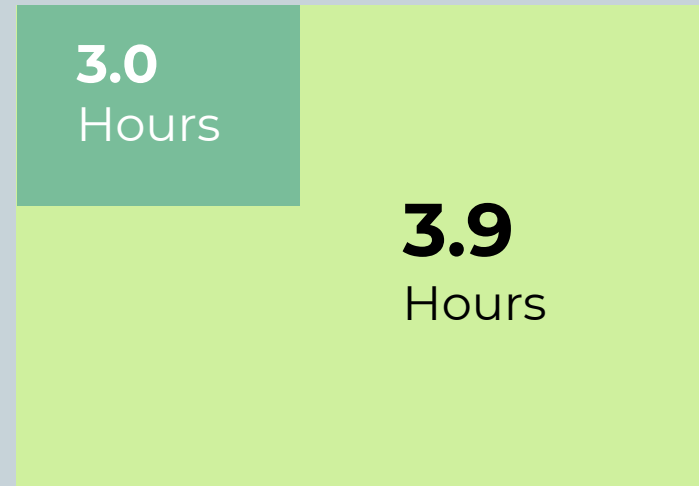
For reasonable accommodations or alternative formats please contact the Minneapolis Health Department at 612-673-3000. People who are deaf or hard of hearing can use a relay service to call 311 agents at 612-673-3000.  
TTY users call 612-673-3157 or 612-673-2626.  
Para asistencia 612-673-2700, Rzu kev pab 612-673-2800  
Hadli aad Caawimaad u baxantahay 612-673-3500

# Active Technique Options

24% of  
recipes used  
an **Ice Bath**



19% of  
recipes used  
an **Ice Wand**



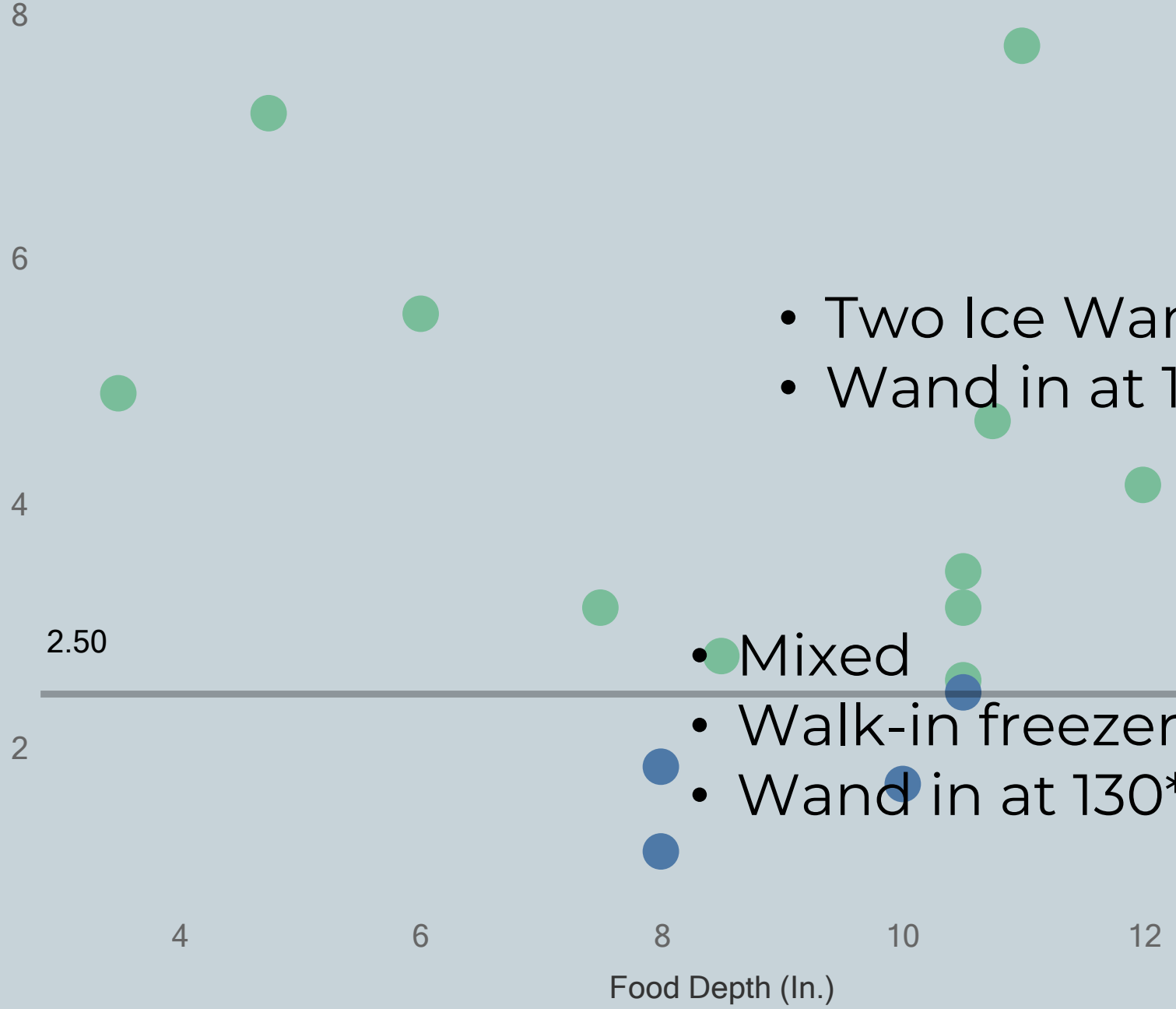
# How do we inspect ice baths?

- **Ice Bath without a wand at depths above 4 inches**
  - This is the riskiest method we observed.
    - Median total cooling 11.6 hours
    - 94% failure rate
    - Negatively associated with success
  - But what if they mix it?
    - No mathematical support
    - Insignificant P value
    - Inconsistent

# How do we regulate ice wands?

- Very inconsistent results by themselves (no ice bath)
- **Ice bath without a wand above 6 inches:**
  - Food fill depths above 6 inches without a significant help.
  - Melted wands
  - Premature storage mode (probably calling both 3-501.15 A and B).

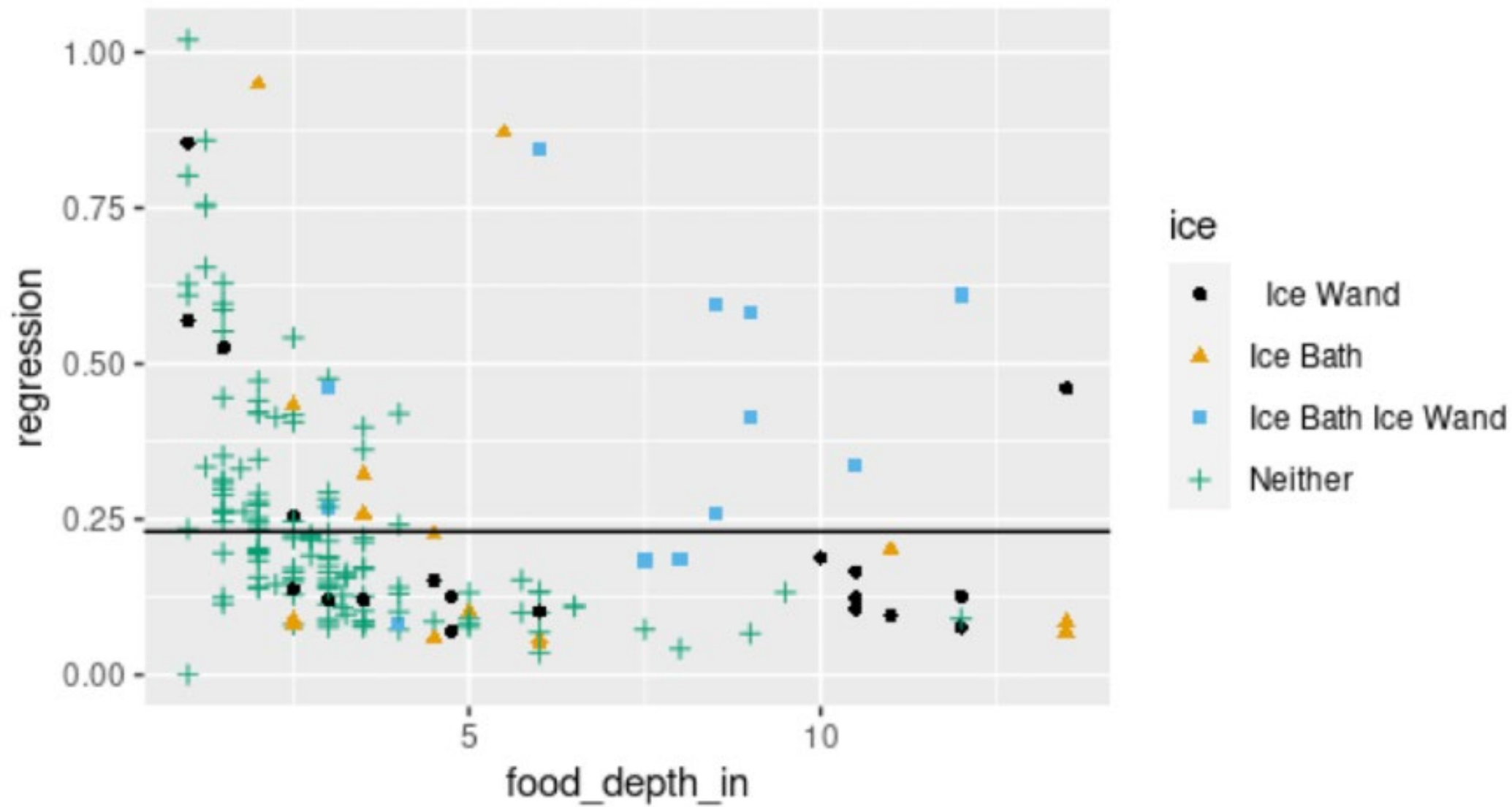
- Same operator
- Add ice
- Walk-in freezer
- Half size Cambro



- Two Ice Wands
- Wand in at 135°F

- Mixed
- Walk-in freezer
- Wand in at 130°F

Regression Coefficient by food\_depth\_in  
and by ice



# Recommended Active Cooling Method

- Combine Wand with Bath
- Replace the wand as it melts
  - First hour
- Replenish the bath as it melts
  - First hour
- Stick with the method until food is completely cooled
  - Reintroduces the need to monitor (therefore passive is considered the best way to rapidly cool foods)
  - This will take 4-6 hours to complete (premature storage mode was commonly seen)

# Cooling with Ice

Cooling food with ice needs regular attention  
and will take several hours.



## When cooling with ice:

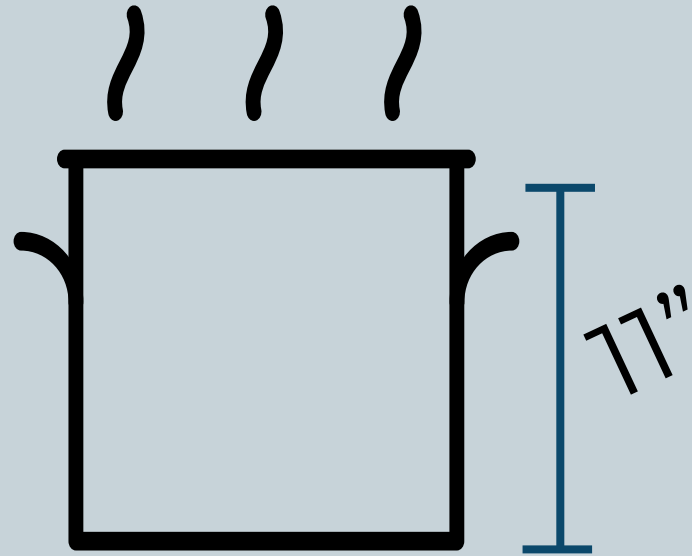
- Use both an ice wand and an ice bath.
- Add more ice as the ice bath melts.
- Replace the ice wand as it melts.
- Keep using this process until the food is 41° F or below.

[www.minneapolismn.gov/FoodSafety](http://www.minneapolismn.gov/FoodSafety)

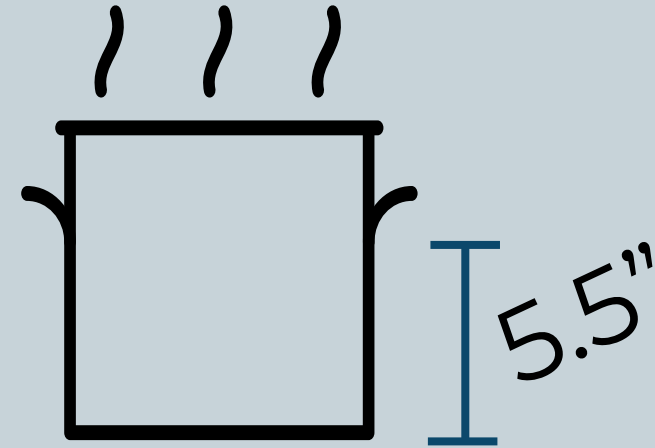
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TTY users call 612-673-3157 or 612-673-2625.  
Para asistencia 612-673-2700, Rau kev pob 612-673-2800  
Hadli'ad Caawimaad u baxantahay 612-673-3500



# Should I Vent?



190°F-135°F  
**6 hours**



160°F-135°F  
**3 hours**

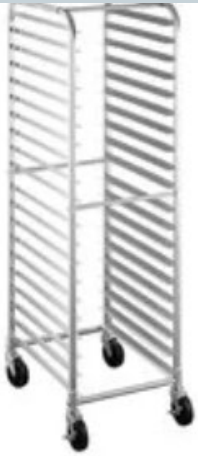
# Should I Vent?



First Attempt:  
Walk-in  
90 minutes  
135-75 F

Second Attempt:  
Vented  
45 minutes  
135-75 F

# Are Cooling Modifications Expensive?

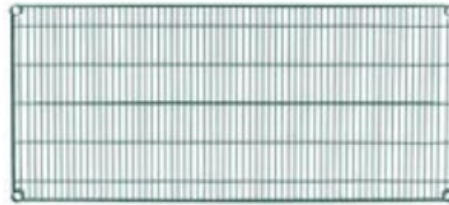


Steelton 20 Pan End Load Bun / Sheet Pan Rack - Unassembled

plus ★★★★★

#109RACKECON

**\$119.99**/Each



COLORS

Metro 2448NK3 Super Erecta Metroseal 3 Wire Shelf - 24" x 48"

plus ★★★★★

#4612448NK3

**\$82.50**/Each



Choice Full Size 2 1/2" Deep 24 Gauge Anti-Jam Stainless Steel Steam Table / Hotel Pan

plus ★★★★★

#4070029

FROM  
**\$9.47**/Each

That's going to take so many pans though...

| Steam Table Pan Capacity |       |                          |     |       |              |      |      |
|--------------------------|-------|--------------------------|-----|-------|--------------|------|------|
| Pan Size                 | Depth | Full Topped-off Capacity |     |       | 85% Capacity |      |      |
|                          |       | Cup                      | Qt  | Ltr   | Cup          | Qt   | Ltr  |
| Full/Hotel Pan           | 2"    | 33.2                     | 8.3 | 7.9   | 28.2         | 7.1  | 6.7  |
|                          | 4"    | 56.0                     | 14  | 13.25 | 47.6         | 11.9 | 11.3 |
|                          | 6"    | 84.0                     | 21  | 19.87 | 71.4         | 17.9 | 16.9 |
| Half Pan                 | 2"    | 17.2                     | 4.3 | 4.07  | 14.6         | 3.7  | 3.5  |
|                          | 4"    | 26.8                     | 6.7 | 6.34  | 22.8         | 5.7  | 5.4  |
|                          | 6"    | 40.0                     | 10  | 9.46  | 34.0         | 8.5  | 8.0  |
| Torpedo Pan              | 1"    | 8.4                      | 2.1 | 1.99  | 7.1          | 1.8  | 1.7  |
|                          | 2"    | 14.8                     | 3.7 | 3.5   | 12.6         | 3.1  | 3.0  |
|                          | 4"    | 22.8                     | 5.7 | 5.39  | 19.4         | 4.8  | 4.6  |
|                          | 6"    | 32.8                     | 8.2 | 7.76  | 27.9         | 7.0  | 6.6  |
| Two-thirds Pan           | 1"    | 16.0                     | 4   | 3.79  | 13.6         | 3.4  | 3.2  |
|                          | 2"    | 22.4                     | 5.6 | 5.3   | 19.0         | 4.8  | 4.5  |
|                          | 4"    | 37.2                     | 9.3 | 8.8   | 31.6         | 7.9  | 7.5  |
|                          | 6"    | 56.0                     | 14  | 13.25 | 47.6         | 11.9 | 11.3 |
| Third Pan                | 2"    | 10.4                     | 2.6 | 2.46  | 8.8          | 2.2  | 2.1  |
|                          | 4"    | 16.4                     | 4.1 | 3.88  | 13.9         | 3.5  | 3.3  |
|                          | 6"    | 24.4                     | 6.1 | 5.77  | 20.7         | 5.2  | 4.9  |

2-inch fill = ~ 2 Gallons

Convert a full 22 Quart Cambro into 3 hotel pans



# Strengthen Your Inspections Through Observations

- Conduct initial walkthrough
- Review all cooling steps
- Temp food with a purpose
  - Consider temperature variance
- Small wares inventory

# Strengthen Your Inspections Through Observations

- Supporting data and questions
- Be patient with data points
- Avoid asking “When did you cook this?”
- Ask When and Who?
- Discuss recipe yield and frequency
- Be confident!

# Approaching Department Changes: Policy

Interpret 3-501.15A in a way that defines shallow

Call method violations without cooling data points

Clarify your marking instructions

Measure your success

# Approaching Department Changes: Procedural

Call both 3-501.15A and 3-501.15B when applicable

Active Managerial Control violation

Call insufficient cooling equipment for lack of smallwares

Rethink the value of cooling logs



# Thank You!

**Nick Koreen**

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612-505-9014