

April, 2021



MONTANA
FOOD & CONSUMER
SAFETY PROGRAM



Articles This Month

1. Training Updates and Opportunities
2. Licensing Update
3. Inspection Marking Challenge: Bakery Adventure II
4. Cottage Food Applications: What To Do When They Cross Your Desk
5. Outbreak: Pseudomonas Aeruginosa
6. Pool Updates
7. History of Public Health: Forming the Rocky Mountain Labs in Hamilton
8. Fun Facts: Crossword



MONTHLY FCSS CONFERENCE CALL
Every 2nd Tuesday at 9AM!!

CLICK HERE TO JOIN ON YOUR COMPUTER, TABLET, OR SMARTPHONE!

Join us to stay informed and up to date!!

OR dial in using your phone:
US (TOLL FREE): 1 (877) 568-4106
US: (646) 749-3129
ACCESS CODE: 818 968 973

ORIGINAL ART BY JOHN FALTER

1. TRAINING OPPORTUNITIES



Join us on Tuesday, May 18th at 9 am for May's webinar. Justan Baker, from Riverstone Health (Yellowstone County), will present "The Impact of COVID-19 on Reported Gastrointestinal (GI) Illness Incidence in Montana in 2020". His presentation summarizes his study examining Montana's GI data for 2019 and 2020. He will include data related to GI complaints and emergency department data as well. Justan conducted this study as part of his Masters in Public Health program. He will provide information on how this data is collected, and what GI illnesses are tracked in Montana.

We are in the planning stages for Summer Institute. More details and a survey will follow soon. This training will focus on topics for new and somewhat new sanitarians, including rules and laws governing sanitarians, inspection activities, and other agencies with which sanitarians may interact such as DEQ.

Remember to mark your calendars for Sept. 20-22 for the MEHA conference which will be held in Helena. More details to follow.

-Nina

2. LICENSING UPDATE



The final payment for 2020 has been made, please check to make sure you received what you expected.

Unpaid licenses will be inactivated on May 26th, please remember that after that date you will need to collect license fees and submit them with the change form. We are not collecting 2021 late fees at this time.

-Gail

3. Inspection Marking Challenge



Bakery Adventures II

As a member of an intrepid food inspection team, you are conducting a joint inspection with your supervisor of a problematic bakery that specializes in manufacturing various breads and bagels. You arrive to introduce yourself and your

boss to the person in-charge (PIC) who allows you to conduct the inspection unescorted, after showing your identification to the PIC.

The firm has a vast array of bulk food ingredients in the processing area including sugar, salt, cereal flours, yeast, poppy seeds and sesame seeds, among other ingredients stored in 20-gallon plastic bins with lids. Staff regularly scoop bulk ingredients from the bin into a mixing bowl. Regular cleaning of processing and packaging equipment and food-contact and non-food-contact surfaces is not a very high priority for management or staff. This fact is evident in the large amount of encrusted food debris on finished product conveyor belts (see photo example),

product slicing machines, raw ingredient mixing units and even the floor junction where the concrete floor meets the reinforced fiberglass wall on the south side of the processing area. Amid all the food debris along the south side wall near the bulk sesame seed bin, your supervisor observes suspect 27 units of black material that he identifies as mice fecal matter, and advises you to write this as a violation on the written inspection report as evidence of a mice infestation. Based on this limited information, how would you document the two general findings that are of the most public health significance with regard to writing the observation, issuing a correction order, citing a code section and assigning a correction date?



~Best answer for inspection challenge~

The final food products are considered ready-to-eat and are low risk for transmitting foodborne illness from biologic hazards. Other potential hazards for these products include a low risk for chemical and physical dangers, such as metal or plastic fragments from broken equipment or utensils. Therefore, after the baking process and prior to packaging, the food should be regarded as ready-to-eat and there should not be bare-hand contact with the food. In addition, most bigger bakery operations run the final product through a metal detector prior to packaging.

In this scenario, the less urgent concern is the absence of regular cleaning and sanitizing of food contact surfaces comprising processing equipment and utensils. Cleaning priority should be focused on equipment and utensils used between the end of the baking process and prior to packaging final product. To document these observations for the report, something to the effect of: "Inordinate quantity of dried food debris accumulation between conveyor belt seams," etc., would suffice for written documentation. But if enforcement action is anticipated for a problematic operator, it would be wise to also include photos or video of the violation. In addition, you should decide on an appropriate correction date and include management in on the decision making process, if possible. In this circumstance, such cleaning should be, at the latest frequency, between workdays or change in

products, especially if major allergens are a concern. With regard to code citation for the aforementioned conveyor belt seam, the best code citation would be item 47, paragraph 4-601.11 (A). However, a better argument could be made to mark as item 37, paragraph 3-305.14 for unpackaged food being protected from environmental contamination, if you observed food being conveyed by the belt during the inspection.

But this is the bookkeeping portion of the inspection. The important point is to recognize the potential hazards and be able to place them in perspective of urgency.

The elephant in the room of more urgent concern appears to be the supervisor's observation of a suspected mice infestation. However, sometimes appearances can be deceptive, based on biases and assumptions. A pest infestation that is out of control in a food processing plant can occasionally be as serious and difficult to mitigate as a resident *Listeria* bacterial colony. Therefore, extra caution and supporting evidence would be wise to investigate and document before concluding to issue a correction order.

What alternative hypothesis might explain the supervisor's observation, based on the information provided in paragraph two in the scenario? What equipment might aid in confirming or possibly call into question the allegation? What other investigative or interview techniques might be used to test an alternative hypothesis?

Best answers to this scenario next month.

-Jeff

4. Cottage Food Applications



What To Do When They Cross Your Desk

There have been several new cottage food applications in the last few months. A few simple steps can make it go smoothly. First, the \$40 payment stays at the county--no need to send it to FCSS. After you review the application, submit the first page and attach the approved cottage food products list (available on the Sanitarian resource page--Forms) indicating the approved items by initialing each one. Some counties prefer to issue a letter that lists the approved products; this can be attached to the application front page, rather than the approved cottage food products list. These should be submitted by email to Gail Macklin and copied to Nina Heinzinger. They may also be mailed, but this can cause delays. There is no need to mail the recipes or labels with the application.

If your operator submits recipes for items that you are not sure if they qualify for cottage food, please feel free to forward the information to me for additional review and advice. This is especially important for ingredients you do not recognize. Teas have been submitted with ingredients that are considered dietary supplements and

not food, so it is important to check. I will reach out to you if there are items on the approved list that do not sound like a cottage food item. Items may be approved on a case by case basis, if someone proposes a product that is not on the list but sounds like it is not potentially hazardous. This was recently the case with freeze dried candy, which is now being made as a cottage food in a couple of counties.

The operator should provide you with the labels for their products. These need to meet the cottage food label requirement, containing the following information: statement of identity (i.e. cookie, candy), ingredients, allergens (if any), name and address, net quantity, and the disclosure statement about made in a home kitchen. If they are selling different amounts of the same product, they may put a line for net weight and complete it upon packaging.

Once the application is received by our office, Gail will generate a registration certificate and mail it back to the county for your signature. You can then send it on to the cottage food operator. We sometimes get questions if they need to wait for their certificate to sell their product. The certificate confirms the items approved, so if they have the application front page and the list of approved items signed by the sanitarian, the operator may use these until the certificate arrives, as they contain the same information as the certificate, similar to the license application copy you provide establishments.

In summary--

1. Receive application--keep the check
2. Review application for approved products, ingredients, labels--have questions, contact Nina
3. Email 1st page and approved product list to Gail and Nina
4. Certificate generated and mailed to county for signature

Thanks for all you do in this area and reach out for guidance as needed.

-Nina



Pseudomonas Aeruginosa Outbreak at Body Art Studio

You are contacted by the local health nurse. She tells you that there have been several confirmed cases of ear piercings developing Pseudomonas infections linked to a local body art shop. You go the shop for a follow up. The shop is clean, staff is knowledgeable, and helpful. Sanitization procedures are in place and appear to be followed. They have been diligent about sending in spore tests. All of which have passed.

Staff walks you through procedures. They are using Purklenz (active ingredient Chloroxylonol) to prep skin for piercing. This is an approved antiseptic. Unfortunately, per the CDC, [a number of investigators have since reported that Pseudomonas are resistant to Chloroxylonol and Chloroxylonol-based disinfectants.](#)

ARM 37.112.132 specifies that all non-disposable instruments must be “cleaned thoroughly with an appropriate soap or detergent and rinsed completely with potable water.” They are using Green Soap to accomplish this. Once again, this is an approved item. The rule in its current state does not specify that sanitization must be done.

As Pseudomonas are commonly found in water systems, you collect water samples from the sinks. One of these samples comes back positive.

Recommendations are as follows:

1. A weekly hot water flush. This is **every** sink in the facility turned on to the hottest setting and ran for at least 5 minutes;
2. Using extra caution around the sink such as watching for water splashing up;
3. Using the 3 foot splash zone recommendation - making sure everything is at least 3 feet from all sinks;
4. Using a cleaning product on reusable equipment that is effective against pseudomonas;
5. Extra hand hygiene practices;
6. Switch to 70% isopropyl alcohol for skin prep

-Staci



The state office will be responsible for inspections of at least 127 licensed public pools this year. It looks like our longest drive will be 493 miles from Helena out to Plentywood, MT. Let me know if your county may be interested in conducting your own pool inspections and we can discuss conducting a joint training this summer. Much thanks to Liberty, Riverstone, and Dawson counties for picking up some extra inspections to help us out.

CDC’s national Healthy and Safe Swimming Week is usually the week before Memorial Day, May 24 through May 28. The CDC is working to update their safe swimming communication toolkits and has promised new information for 2021. You can currently find their 2020 website [here](#).

We will also be working to provide some simple messages, press releases, and hopefully educational materials or maybe even posters. Many recreational facilities are not open for swimming in Montana until late June. So we would like to participate in the national safe swimming week and then continue our outreach into June to keep it fresh for those facilities. Please let me know if you have any ideas for how we can help promote safe swimming in your jurisdictions.

There appears to be the potential for a national shortage of trained lifeguards. We are also seeing a strong national push for virtual, or remote training courses. So I want to remind everyone that lifeguard training must be conducted in person with effective one-on-one personal skills practice and evaluation. CPO, and CPR training may be conducted remotely if the trainer can provide a remote experience that meets the same level of training standards as the standard classroom. We have not received any submittals for approval of online training and do not currently have any virtual courses approved for use with public swimming pools.

I am aware of some virtual training courses that do not include one-on-one skills practice and evaluation. These are mostly provisional certificates that are intended as a refresher for somebody that has recently been certified. The students are generally required to return to a secondary training course for the one-on-one skills practice and evaluation to gain full recertification. Studies by the American Red Cross show that students tend to retain lifeguard training skills for only the first year, and by two years they have lost a significant amount of the technical knowledge. This is why a provisional certification is not generally acceptable for use in a public facility. As we approach summer and opening season of our recreational facilities, you may find facilities that do not have trained staff. Please work with these facilities to ensure they get the required trained staff, and maintain a safe atmosphere for the public. This may require closure of some areas of the facility, or restricted occupancy, so existing trained staff can efficiently cover their responsibilities. I do not recommend opening of a facility that does not have properly trained staff.

-Erik

7. History of Public Health: Rocky Mountain Labs in Hamilton

Missoula's Role in Identifying Rocky Mountain Spotted Fever and the Formation of Rocky Mountain Labs in Hamilton

Spring is approaching. That time of year when we must get the snow tested as [Rocky Mountain Spotted Fever](#) (RMSF) is caused by drinking the water from bad melting snow, at least that was the prevailing theory in 1901. That year, Montana State Board of Health was created. Its top priority was to bring health scientists in to investigate the cause, treatment, and prevention of the disease (much to the chagrin to snake oil salesmen who "tested" the snow).

[Howard Ricketts](#), a pathologist, was among the first to arrive in the Bitterroot Valley. With the help of two doctors, [who theorized that ticks were the vector of RMSF](#), he set up a tent in Missoula to use as a lab. In this lab, they were able to prove that ticks could cause the infection by attaching one to a guinea pig. By 1909, he had isolated the organism that was responsible for RMSF. It was later named *Rickettsia rickettsii* in his honor.

Following Ricketts death in 1910, research on RMSF was split between an entomologist and a doctor, both of whom would die of RMSF. The entomologist was attempting to identify the reservoir animal by destroying small mammal populations. The doctor turned to protecting cattle and sheep by dipping them in pesticide. Neither of these methods was effective and local ranchers were not keen on dipping their livestock. Research on a vaccine began.

Drs. Spencer and Parker produced the first effective vaccine. In 1921, Parker found an abandoned schoolhouse near Hamilton. The "Schoolhouse Lab," as it was known, was the facility where ground up tick tissue was used to produce a vaccine.

In the spring of 1927, Montana legislature appropriated \$60,000 for a new building. A site in Hamilton was chosen. [Rocky Mountain Labs \(RML\) was completed in early 1928.](#)

Since its inception, RML has played a key role in protecting our nation's health and wellbeing. During World War II, the laboratory became a "national vaccine factory," producing vaccines to protect soldiers against spotted fever, typhus, and yellow fever. Currently, its one of only nine [biosafety level 4 labs](#) in the United States. [Research and vaccine development for Ebola was conducted there.](#) [More recently, they have been at the forefront of COVID-19 vaccine development.](#)

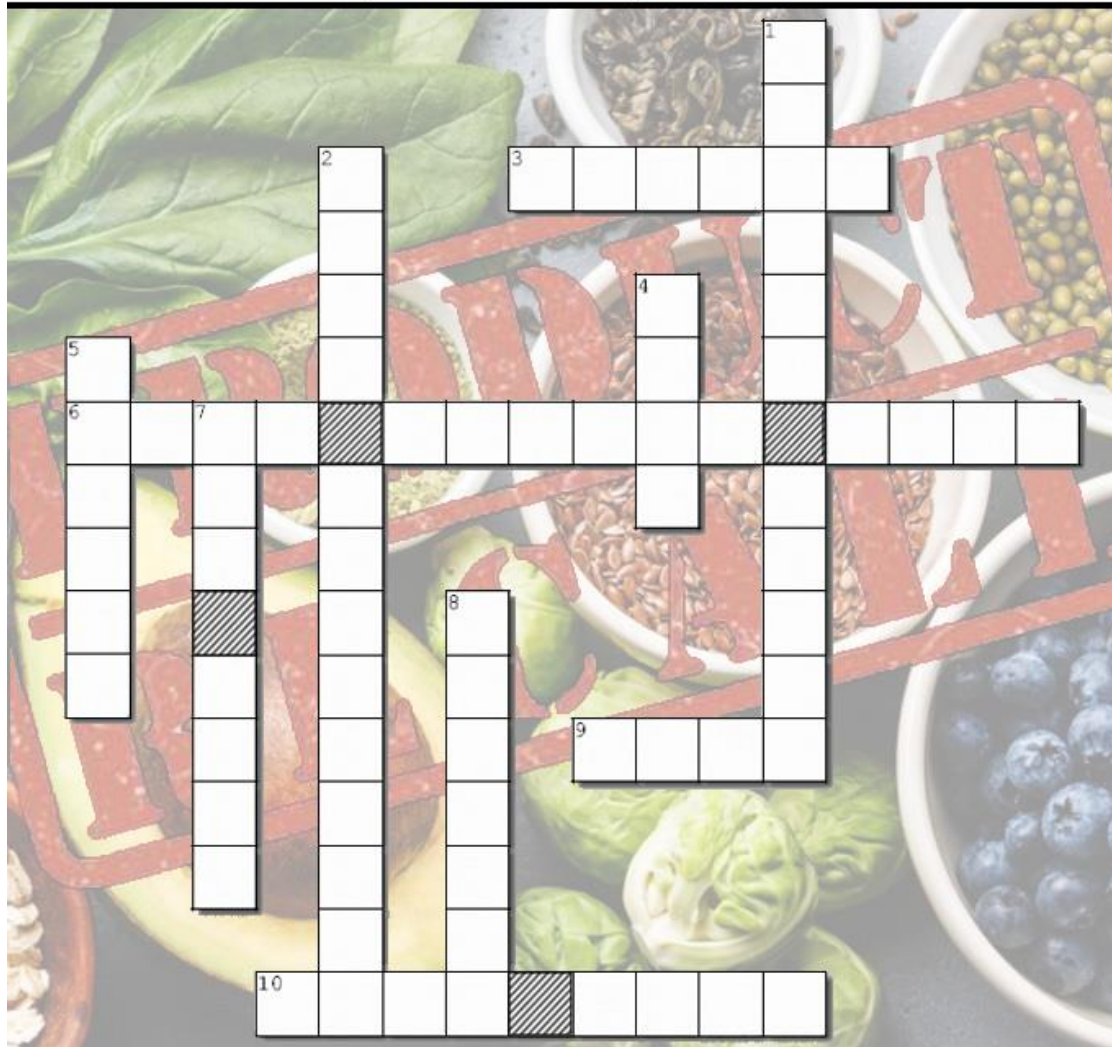
-Staci

8. FUN FACTS



#1 Offenders

Complete the crossword puzzle below



Across

3. I'm a drug used for opioid withdrawal & tend to have a Salmonella presence
6. I have been linked to a deadly 2019 *Listeria* outbreak; found in salads whole or sliced
9. I have been recalled due to elevated levels of histamine
10. Often I am not declared on the package label as a major allergen

Down

1. Though tempting, I may make you sick if you don't bake me; I am also your favorite ice cream flavor
2. Selling out in stores everywhere; I have been recalled due to levels of methanol
4. As a whole I am usually safe, ground up I may cause illness due to E.coli; Moo!
5. Spring time I am found in farm stores, causing salmonella in children who handle me; I'm super cute!
7. I'm straight from the source; not currently legal for sale in Montana
8. I've been the culprit causing illness from E.coli; Your caesar salad isn't the same without me

Click here for
answers to last week's puzzle
and a printable version of our
fun fact!

Contact Information

FCS Staff Listing

Name	Email	Phone
Ed Evanson	eevanson@mt.gov	444-5309
Erik Leigh	eleigh@mt.gov	444-5306
Gail Macklin	gmacklin@mt.gov	444-2415
Jeff Havens	jhavens@mt.gov	444-5302
Keturah Fortner	Keturah.Fortner2@mt.gov	444-2837
Nina Heinzinger	nheinzinger@mt.gov	444-0067
Sadie Overlie	sadie.overlie@mt.gov	444-2823
Staci Evangeline	staci.evangeline@mt.gov	444-2089

FCSS | Phone: (406) 444-2837 | Fax: (406) 444-5055

hhsfcs@mt.gov | <http://fcss.mt.gov>

If you are in crisis and want help, call the Montana Suicide Prevention Lifeline, 24/7, at 1-800-273-TALK (1-800-273-8255) or text 'MT' to 741-741.

Stay Connected with the Montana Department of Public Health and Human Services



SUBSCRIBER SERVICES:
[Manage Subscriptions](#) | [Help](#)