

**REQUEST FOR VARIANCE**State Form 51184 (R / 5-13)
Food Protection Program**RECEIVED**

MAR 03 2015

INDIANA STATE DEPARTMENT OF HEALTH
Telephone: 317/234-8569 FAX: 317/233-9200**FOOD PROTECTION PROGRAM
INDIANA STATE DEPT OF HEALTH**

1. Individual Submitting Request:		Date: <u>02 / 27 / 2015</u>	
Name: <u>SAIKOU INC.</u>		Telephone: <u>(443) 415-8683</u> Fax: <u>(717) 918-5443</u>	
Mailing Address: <u>1 VETERANS WAY, STE 105</u>		Email: <u>gumsan@saikousushi.com</u>	
<small>Number and Street</small>			
<u>CARLISLE</u>	<u>PA</u>	<u>17013</u>	
<small>P.O. Box</small>	<small>City</small>	<small>State</small>	<small>ZIP Code</small>
2. Person/Organization Seeking Variance:			
Name: <u>GUM SAN NSANG</u>		Email: <u>gumsan@saikousushi.com</u>	
Mailing Address: <u>1 VETERANS WAY, STE. 105</u>			
<small>Number and Street</small>			
<u>CARLISLE</u>	<u>PA</u>	<u>17013</u>	
<small>P.O. Box</small>	<small>City</small>	<small>State</small>	<small>ZIP Code</small>
3. Food Establishment(s) for Which Variance is Sought			
Include the following information for each food establishment: <i>(List here or attach additional pages if necessary.)</i>			
• Physical Location <i>(if different than mailing address):</i> <u>see attached</u>			
• Mailing Address: <u>1 Veterans Way, Ste. 105, Carlisle, PA 17013</u>			
<small>(Number, Street, City, State, and ZIP Code)</small>			
• Telephone Number: <u>(443) 415-8683</u>		Fax Number: <u>(717) 918-5443</u>	
• Person at each retail food establishment most responsible for supervising: <u>BRANG SENG</u>			
4. State how the proposal varies from each rule requirement, citing relevant rule sections by number:			
<i>(Attach additional pages if necessary.)</i>			
Section 187 of 410 IAC 7-24, "Retail Food Establishment Sanitation Requirements" relating to the production of sushi rice as a non-potentially hazardous food (non-TCS: non-Time/Temperature controlled for safety food) from a potentially hazardous food (TCS: Time/Temperature Controlled for Safety Food) by a process of acidification. The method of holding food colder than 41F or hotter than 135F is altered by acidifying rice at pH level 4.1 and below.			
5. Explain how the potential public health hazards and/or nuisances will be alternatively addressed by the proposal. Include supporting studies, Hazard Analysis Critical Control Point (HACCP) Plan(s), standard sanitation operating procedures, and/or any other evidence: <i>(Attach additional pages, if necessary.)</i>			
Every batch of sushi rice cooked in the morning are measured by calibrated digital pH meter to ensure acidity level is below 4.1pH. Critical analysis and studies show acidified sushi rice with pH value of 4.1 or less and holding at room temperature is safe and the acidity control the growth of bacteria. Sushi rice pH level is logged on every batch cooked and maintains at non-hazardous food condition. Rice is completely used or discarded within 6 hours at room temperature. Sushi rice is used in Saikou sushi contains rice and vinegar with 3.2% or 3.4% acidity.			

6. List how the proposal demonstrates the following (if applicable to the request):

- A) How the proposal differs from what is common and usual in similar industry situations:
It is industry practice to roll sushi using room temperature sushi rice. Most if not all mitigate risk by ensuring proper pH level, below critical limit, as a control method.
- B) How the proposal is unique and not addressed in existing rules or law:
Existing law requires holding outside of 41F and 135F and a variance for any method of altering process. By holding sushi rice between 3.3 to 4.1pH, it becomes safe to remain at room temperature.
- C) How the proposal does not diminish the protection of public health:
Under compliance with the HACCP plan, sushi rice at pH level 4.1 or less is safe to holding at room temperature.
- D) How the proposal is based on new scientific or technological principle(s):
To discourage bacteria growth, sushi rice must be between pH range: 3.3 - 4.10, below critical limit; hence, avoiding pH danger zone: 4.60 - 7.50.
- E) How the implementation of the variance would be practical:
The quality of product and service will greatly be enhanced and consistent by implementing the variance. Logging of every batch of sushi rice, taking corrective action when necessary, will maintain the acidity level of sushi rice.

7. Explain how the person/organization seeking the variance will assure that all provisions of a granted variance will be enacted at each food establishment for which a variance has been granted:

Saikou Inc records pH level of each batch of rice via digital meter and paper test strips as backup. The log also includes daily calibration schedule and corrective action measures. The log book records date, time, and pH values of every batch of sushi rice made.

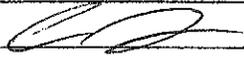
8. List all affected parties known by the person/organization seeking a variance, including all affected regulatory authorities: (Attach additional pages if necessary.)

Marion County Health Department, Hamilton County Health Department, and Indiana State Department of Health

9. Attach copies of any related variances, waivers or opinions issued by other governmental agencies.

For Office Use Only

10. Signature of Individual Making Request:



Printed Name, Title: GUM SAN NSANG, Owner

1. IU Health – North
11700 N. Meridian St.
Carmel, IN 46032

2. IU Health – Methodist
1701 N Senate Ave
Indianapolis, IN 46202

3. IU Health – University
550 University Blvd.
Indianapolis, IN 46202

4. IU Health – Riley
705 Riley Hospital Dr.
Indianapolis, IN 46202

Sushi Rice HACCP

The following pages include the HACCP plan for sushi rice. Keep this in your Operation Manual at all times.

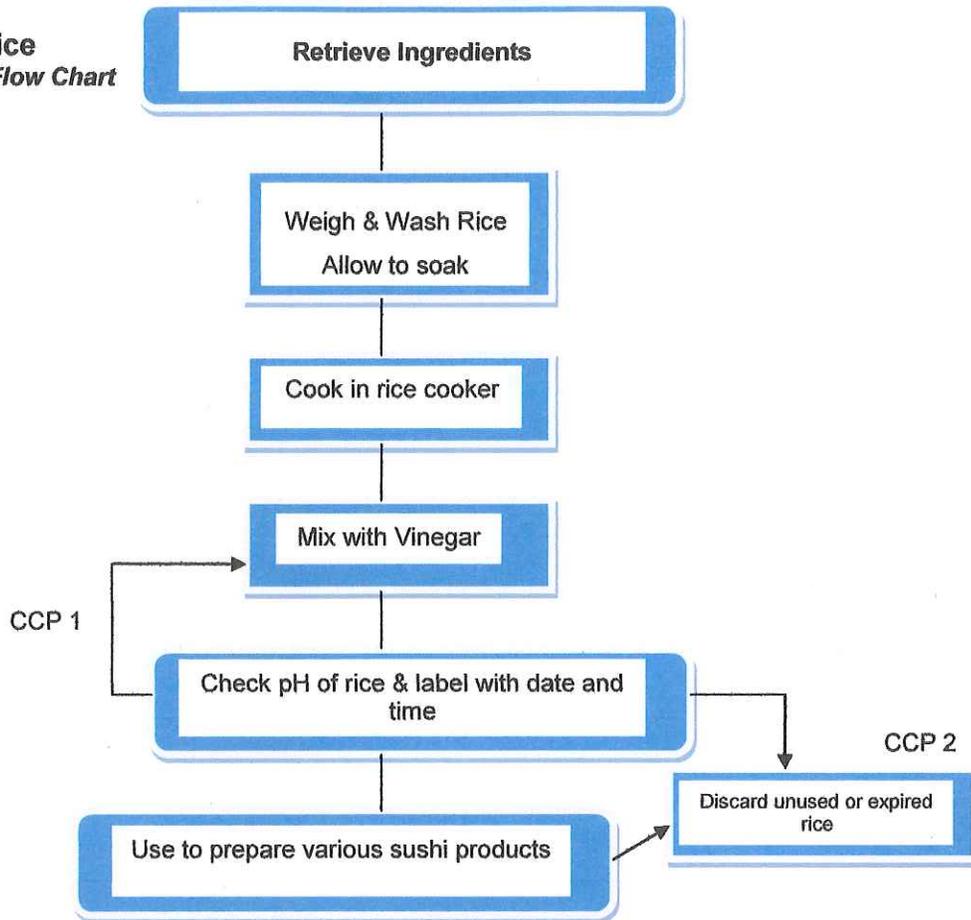
Remember: You sushi rice HACCP must be approved by your state or local Health Department.

If your local Sanitarian requires a complete HACCP plan for sushi products, please instruct them contact the Legal Department for an official copy.

Kachin International Sushi Products

Process Flow Diagram

Sushi Rice
Process Flow Chart



HAACP Plan

Product: Sushi Rice

CCP2 -- Discard unused or expired rice	CCPI -- Check pH of rice and label with time completed	(CCP)
B -- pathogen growth, contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella, Hepatitis A, Norwalk)	B -- Pathogen growth (Bacillus cereus, Clostridium botulinum), contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella Hepatitis A, Norwalk)	Hazards Addressed
B -- Proper documentation and employee training. Respect for SSOP	B -- pH level at or below 4.1. Respect for SSOP	Preventive Measures
Discarded after 10 hours at room temperature	ph 4.1 or lower	Critical Limits
Rice used for preparing sushi	pH level of rice after vinegar is applied	What
Check time labeled on rice container	Calibrated pH meter	How
Every day	Every batch	Frequency
Trained sushi chef or employee	Trained sushi chef or employee	Who
1. Immediately discard rice and any sushi that was prepared after the expired time.	1. Mix rice again to ensure even distribution of vinegar. Blend in small amount of vinegar and recheck pH until it reaches a pH of 4.1 or below	Corrective Action
Periodic observation of monitoring. Daily observations of documentation to ensure critical limits have not been exceeded.	Daily calibration of pH meter. Periodic observation of monitoring. Daily observations of documentation to ensure critical limits have not been exceeded.	Verification
	Rice pH log also containing corrective action pH and time of rice discarded.	Record Keeping

Product: Sushi Rice
 Hazard Analysis and CCPs

Ingredient / Process Step	Potential hazards introduced, or controlled, or enhanced at this step (B) Biological	Is there a severe hazard likely to occur? (Y/N)	Justification for decision	Question 1 Do preventative measures exist for the identified hazards? What?	Question 2 Does this step eliminate or reduce the likely occurrence of hazards to an acceptable level? (Y/N)	Question 3 Could identified hazard(s) occur in the excess of acceptable levels, or could those increase to unacceptable levels?	Question 4 Will a subsequent step eliminate hazard(s) or reduce the likely occurrence to an acceptable level?	Is this a CCP?
Weigh and wash rice. Allow to soak	B -- pathogen growth, contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella, Hepatitis A, Norwalk) C -- chemical contamination (cleaners/sanitizers) P -- foreign objects (glass, hair, metal, jewelry, stones, dirt, etc.)	B -- no C -- no P -- no	B -- SSOP calls for proper personal hygiene, and ill employees are not permitted to food handling. Employee training and SSOP cover proper product handling. C -- Compliance with product specifications. SSOP covers use of approved chemicals only and proper storage away from food area to prevent contamination. P -- Glass policy and employee vigilance.					
Receive ingredients	B -- pathogen growth C -- chemical contamination (cleaners/sanitizers) P -- foreign objects (stones, dirt, wood, insects, broken glass, metal fragments, ect.)	B -- no C -- no P -- no	B -- Low risk product; pathogen growth not likely to occur. SSOP and employee training address proper handling & storage. Compliance with product specifications. C -- Compliance with product specifications. SSOP covers use of approved chemicals only and proper storage away from food area to prevent contamination. P -- Compliance with product specifications. Packaged product.					

<p>Mix with vinegar</p>	<p>Cook in rice cooker</p>
<p>B – pathogen growth, contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella, Hepatitis A, Norwalk) C – chemical contamination (cleaners/sanitizers) P – Foreign objects (glass, hair, metal, jewelry, stones, dirt, etc.)</p>	<p>B – pathogen growth, contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella, Hepatitis A, Norwalk) C – pathogen growth, contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella, Hepatitis A, Norwalk) P – Foreign objects (glass, hair, metal, jewelry, stones, dirt, etc.)</p>
<p>B -- no C -- no P -- no</p>	<p>B -- no C -- no P -- no</p>
<p>B – Cooking the rice at boiling point will reduce all vegetative pathogens to a safe level. SSOP calls for proper personal hygiene, and ill employees are not permitted to food handling. Employee training and SSOP cover proper product handling. C – SSOP covers use of only approved chemicals for cleaning / sanitizing food contact surfaces/equipment and proper storage away for food to prevent contamination. P – Glass policy and employee vigilance</p>	<p>B – Cooking the rice at boiling point will reduce all vegetative pathogens to a safe level. SSOP calls for proper personal hygiene, and ill employees are not permitted to food handling. Employee training and SSOP cover proper product cooking instructions. C – SSOP use of approved chemicals for cleaning and sanitizing food contact surfaces/equipment. SSOP covers proper storage away from food area to prevent contamination. P – Glass policy and employee vigilance</p>

Hazard Analysis and CCPs
Product: Sushi Rice

Hazard Analysis and CCPs

Product: Sushi Rice

	Check pH of rice and label with date and time completed		
<p>Discard expired or unused rice</p> <p>B – Pathogen growth, contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella Hepatitis A, Norwalk)</p> <p>C – chemical contamination (cleaners/sanitizers)</p> <p>P – Foreign objects (glass, hair, metal, jewelry, stones, dirt, etc.)</p> <p>B – yes C – no P – no</p>	<p>B – Pathogen growth (Bacillus cerus, Clostridium botulinum), contamination (Listeria monocytogenes, Staphylococcus aureus, Shigella Hepatitis A, Norwalk)</p> <p>C – chemical contamination (cleaners/sanitizers)</p> <p>P – Foreign objects (glass, hair, metal, jewelry, stones, dirt, etc.)</p> <p>B – yes C – no P – no</p>	<p style="text-align: center;">See Process Flow diagram</p>	<p>B – At an increased time, pathogen growth can occur. Respect for SSOP food handling.</p> <p>C – Compliance with product specifications. SSOP covers use of only approved chemicals for cleaning/sanitizing food contact surfaces/equipment and proper storage away from food to prevent contamination.</p> <p>P – Glass policy and employee vigilance</p> <p>B – yes B – yes</p>
<p>Use to prepare various sushi products</p>	<p>B – If the correct amount of vinegar is not blended properly into the cooked rice, the pH may not reach 4.1 or below. In this case, blend in a small additional amount of vinegar. The final pH must reach 4.1 or lower to control Bacillus Cereus. Clostridium botulinum can be controlled with a pH below 4.6. SSOP calls for proper personal hygiene, and ill employees are not permitted to food handling. Employee training and SSOP cover proper product handling.</p> <p>X – SSOP covers use of only approved chemicals for cleaning/sanitizing food contact surfaces/equipment and proper storage away from food to prevent contamination.</p> <p>P – Glass policy and employee vigilance</p> <p>B – yes B – yes</p>	<p>B – yes B – yes</p>	<p>CCP 3</p>
<p>CCP 4</p>			

Sushi bar Daily Checklist – Preparation Area

Week Ending: _____

	M	T	W	Th	F	S	S
Item Description							
Initials							
Morning 8:00 - 10:00 AM							
Hand sink noted with hot water Soap and paper towels available.							
Separate Bamboo mats available for raw and ready to eat products.							
Paper towels available for wiping food contact surfaces with spray sanitizer							
Cutting boards sanitized before beginning operation							
Alcohol wipes available to sanitize thermometer							
Sanitizer test kit available							
Initials							
Mid-day 12:00 – 2:00 PM							
Hand sink noted with hot water							
Soap and paper towels available							
Cutting boards, knives, counters and cart cleaned and sanitized							
Plastic wrap on mats changed							
Initials							
Closing 4:00 – 6:00 PM							
Cutting boards, knives, counters and cart cleaned and sanitized							
Plastic wrap on bamboo mats changed							

Sushi Bar Daily Operating Procedures

*****All finished products are always held at or below 41°F*****

Opening 8:00 – 10:00 a.m.

- Pull previous day's products from the display case.

- Document on the Daily Production Worksheet - discard waste.

- Transfer rice into *rice container*.

- Prepare a second batch of rice as needed.

- Separate bamboo mats available for raw and ready-to-eat products.

- Bamboo mats covered with plastic wrap. Food contact surfaces cleaned and sanitized.

- Rice scoop is stored so handle is not touching the product.

- Personal items stored away from food area.

Mid-day 12:00-2:00 p.m.

- If necessary, a third batch may be cooked.

- Plastic wrap on bamboo mats changed.

- Food contact surfaces cleaned and sanitized.

Closing 4:00 – 6:00 p.m.

- Pull and pre-chill all ingredients to be used for next day's sushi production.

- Prepare products for use the next day.

- Pull fish to be used tomorrow. Thaw by placing it on the bottom shelf in cooler.

- Discard all unused and/or leftover rice.

Labeling and Shelf Life

- Sushi products that contain acidified rice or raw fish have a maximum 2 day shelf life.

- Products that do not contain acidified rice or raw fish such as Seaweed Salad, Squid Salad, and Edamame have a 5 day shelf life.

- All packages have the "Keep Refrigerated" warning on the label.