



Environmental Assessment

Request

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As Governed by Pima County Code 8.08 3950 S. Country Club Rd, Ste 2301 Tucson AZ 85714 Phone 520-724-7908, Fax 520-724-9597		Purpose of Inspection Environmental Assessment - Request	Est. Type and Risk Category Hotel Greater than 76 Rooms (5000A)	Date 11/23/2021 Time in 11:10 AM Time out 02:11 PM
Establishment Red Roof Inn Tucson Downtown - University	Address 1300 N STONE AVE TUCSON AZ 85705	Permit Number 3181109	Assessment Observations/Site Visit	
		Permit Holder JNML LLC		

R = Request OBS = Observations C = Complaint

Environmental Assessment

- Reason for environmental assessment:
Observations: Environmental Assessment requested to evaluate food service at Red Roof (RR) location for clients placed by International Rescue Committee (IRC). Assessment was requested by the Pima County Health Department Epidemiology team and senior leadership due to concern over rapid onset of vomiting illness 3-4 hours after consuming suspected lunch meal on 11.22 that was prepared by volunteers with the organization ELFA on 11.21 in a non-permitted kitchen.

R

- Employee health policy/personal hygiene practices:
Observations: No handwashing sinks in a convenient location relative to where the food is served. There is a handwashing sink present in the previously permitted kitchen. Employees onsite use hand sanitizer frequently. Gloves and hand sanitizer are the primary methods for handwashing based on observations.

OBS

No employee oversight of food preparation personnel, food operations, cleaning and sanitizing food distribution, storage, and disposition procedures according to accounts from RR employees and IRC employees due to meal services being provided by volunteers from ELFA most often. According to RR employees, they are not involved in the food service process for clients. IRC PIC stated that they tend to discard the TCS foods sitting out after meal service has ended. No assigned employee to discard unsafe food for catered meals.

RR Employees:

- Posted signage in area that used to be used as a commercial kitchen that identifies the foodborne illness symptoms and reportable illnesses.
- No employees observed ill. PIC stated that no employees were out due to illness in the week prior to the event.

RR employees store some of the catered meals after service and may save some leftovers. Observed RR employees had saved dinner leftovers from day prior. RR PIC stated that food from meal services is not normally saved.

IRC Employees:

- PIC of food operation provides hand sanitizers in locations where food is plated and served to clients.
- No employees observed ill. PIC of food operation stated that no employees were out due to illness in the week prior to event.

IRC employees clean food preparation equipment and RR employees clean areas where dining occurs: floors, dining tables, and kitchen areas. IRC employees occasionally help with plating and serving. Observed IRC employees distribute oranges and beverages in an outdoor area with no handwashing sink. Food was set out on a outdoor table and clients lined up to receive the food and take back to their rooms with a handful staying near the outdoor area to eat and talk.

Corrective Action: Indicate clear person in charge for RR, IRC, and ELFA and ensure that food is safe and so that sick or ill employees do NOT work with foods in order to prevent foodborne illness.



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Due to the lack of the refrigeration holding equipment onsite to cold hold temperature controlled for safety (TCS) foods, facility is required to discard food after service in order to prevent foodborne illness.

Catered food shall be:

- obtained from an approved source
- pre-plated at the approved catering kitchen location to eliminate food handling onsite
- received at the required temperature (135 F if hot and 41 F or below if cold)
- discarded at the required time- at end of meal service

3. Area description:

OBS

Observations: Hotel location operates as a catered feeding site for IRC clients. ELFA volunteer organization provides/ prepares the food obtained from approved sources and individuals from the general public that have provided private donations which are not approved sources to obtain food. Food enters via hotel lobby and is primarily transported via personal vehicles and, according to IRC and ELFA, the food is always covered but insulated bags are not normally used. According to the IRC, food is served out of the main room the majority of the time.

RR employees and IRC employees do not oversee when the food arrived, no temperature is taken when the food is delivered, and IRC employee overseeing meal services cleans the utensils used to plate and handle the meals. Food is normally served in the main room- a large carpeted room with: hand sanitizers, gloves, and eating utensils. No handwashing sinks in area main room.

Facility has a kitchen area that was previously a permitted commercial kitchen. One overfilled commercial refrigerator containing a large amount of personal food and two residential type units (fridge and freezer) comprise the holding equipment onsite. Kitchen has handwashing facilities as well as the three compartment sink (1 large 3-comp in main kitchen and one for beverages in smaller beverage dispensing area), but lacks available surfaces that could be utilized by volunteers delivering meals as a better location to plate meals for clients.

Meals are available for a timeframe of 1 hour. Breakfast is normally provided in the form of sealed, non-TCS items. Lunch is normally TCS foods served between 1-2pm. Dinner is normally a TCS food. Food for various meals can be delivered at any time prior to the meals being served according to RR/ IRC employees.

Corrective Action: Ensure that IRC and RR employees are made aware of when food is delivered and that employees oversee delivery of meals by noting time and temperature of delivered food. Inspector recommends using a log and occasionally verifying that temperatures of delivered food is observed each time food is delivered. Have a backup food service plan if food is out of temperature.

Provide an approved surface in kitchen area (sealed, smooth, and easily cleanable folding table could be used as a temporary solution) to set the food down so that hands can be washed prior to plating the meals.

4. Sanitization products and protocol:

OBS

Observations: Tables are wiped down by RR staff using a quaternary ammonia based sanitizer at full strength, Members Mark Sanitizer (EPA Reg: 6836-302). RR staff supplies the handwashing sink in the kitchen area with the required handwashing aids.

Discussed cleaning of food contact equipment process and procedures with IRC employee. RR employees provided a brief summary of the cleaning process for the beverage machine and igloo water dispensers. Both IRC and RR employees are not doing a sanitizer step in the ware washing process. RR has supplied the three compartment sink with soap, hot water, test strips, and sanitizer. Educated employees on the ware washing process involving sanitization of food contact surfaces of equipment/ equipment used in food preparation.

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Corrective Action: Ensure that facility RR/ IRC employees are properly cleaning food contact surfaces of equipment using a wash, rinse, and sanitize procedure involving the use of test strips to verify that proper sanitization is occurring such that sanitizer concentration does not exceed food safe levels. Ensure that staff is educated on proper ware washing procedures including using a wash water temperature of at least 110 F and that facility follows the posted ware washing handout at the three compartment sink.

Ensure that all basins are washed, rinsed, and sanitized prior to doing any ware washing to prevent cross contamination if basins were used as food preparation sinks. Do not use the three compartment sink as a handwashing sink. Ensure that the basins at the three compartment sink are in the approved indirectly plumbed basins. If needing to wash minimal amounts of produce, ensure that the sanitize basin is washed, rinsed, and sanitized before and after use. Additionally, ensure that the basins are washed, rinsed, and sanitized prior to and after any ware washing occurring in the approved indirectly plumbed basins.

5. Outbreak control measures:

Observations: None. IRC and RR employees stated that they do not check the temperature of TCS foods delivered to ensure that food is received safe. ELFA organization stated that they provide volunteers to prepare the food at the private residence of the individual who volunteered to provide the meals.

Prior to the suspected outbreak, foods from ELFA were made by the same two at a private residence who had some food safety knowledge and a thermometer according to ELFA. Suspect meal prepared at a different residential location by one routine volunteer and at the residence of a new volunteer.

Corrective Action: Pima County Code requires observing the temperature of TCS foods upon delivery and when using time as a public health control (TAC) prior to TCS foods going into TAC.

Use food: from approved sources, prepared by a permitted company/ facility, at a permitted site location. ELFA PIC should obtain a certified food protection manager (CFPM) certification from a nationally accredited organization and volunteers should take a food handlers course and demonstrate competency. Selected location of food preparation shall be permitted to ensure compliance with the food code and that employees and equipment at selected location can be routinely inspected.

6. Observations:

Observations: -Meal distribution location has soiled utensil holder with single-use utensils stored and the food contact portion of the utensils sticking up and out of the holder so that when utensils are retrieved from holder hands contaminate single-use equipment when each individual retrieves a utensil from holder.

-Site does not have a designated food service table and tables are cleaned to site and touch infrequently and on an as needed basis but wiped down often with various products to ensure surface is disinfected. Surfaces with visible soils after cleaning:

-Inspector asked IRC PIC to indicate where the clean utensils are stored after they have been washed with soap and water then allowed to air dry. IRC PIC identified the bin storing clean utensils and inspector observed bin had visible food soils and general soils in addition to safety goggles that PIC indicated may have been PPE from when clients fell ill the day prior. Container and food equipment were relocated to the ware washing area to be rewashed, rinsed, and sanitized. Discussed with IRC PIC that food contact surfaces and equipment holding clean food equipment needed to be cleaned to sight and touch to prevent contamination of clean food equipment.

-ELFA volunteer stated that when lunch meal was brought to the site location breakfast items remained on table as well as visible food soils.

-Three compartment sink in kitchen area is indirectly plumbed however, there is an insufficient air break above the sewage drain line that could result in an increased risk of backflow into 3-comp sink equipment used to hold food preparation equipment and potentially to wash produce.

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-Water lines connected to the juice machine supplying water to the coolers, for staff and clients based on observations, had an open water line sitting on the floor with the line less than 1 inch above the floor with a ball valve 6 inches up from open and exposed water line that could potentially increase the risk of water contamination.

-Main room where food service occurs, will need to be professional cleaned. Ensure that treatment is effective to remove bodily fluid soils due to vomiting occurring in the food service area.

-Site does not have the capacity to cold or hot hold TCS foods. Going forward facility will need to use time as a public health control for all catered meals and will need to obtain a permit due to the fact that location is operating as an unapproved catered feeding site.

Corrective Action: Ensure that individual single-use utensils are held in equipment that is maintained clean to site and touch with the handles up to prevent contamination of utensils.

Ensure that staff has implemented a washing and sanitizing step as part of the ware washing process. Discontinue to practice is rinsing out igloo water dispensers and other self service food equipment.

Treatment for carpet in main room should include products with registered EPA No. that is effective for removing pathogen to prevent future illness.

7. Recommendations:

Observations: Set up a portable handwashing station or, as a temporary solution, a gravity flow handwashing station during food service operations that may occur outdoors until carpeted room is sufficiently cleaned.

TEMPORARY SOLUTION for outdoor handwashing station: Gravity Flow Setup

Hand wash setup shall have a large igloo filled with warm water (preferably a minimum of 100F) and is equipped with a continuous flow spigot that allows the water flow to be turned on and off. Recommend to have hand washing stations in areas where food is served and distributed. Ensure hand washing stations are accessible for staff to wash hands prior to handling any open food.

Provide a portable hand sink equipped with the required handwashing provisions to the location where food will be distributed to clients. Ensure that a PIC is designated to supply handwashing sink with soap and paper towels as needed as well as to ensure that portable sink is maintained with water of at least 100 F to ensure that lather is created using friction between hands for a more effective handwashing procedure and based on soap label recommendation. Have a handwashing procedure in place and review with food handling staff/ volunteers and staff that could fill in for food handlers on when, where, and how to wash hands.

Start a record keeping log to document all Time/Temperature Control for Safety (TCS) foods that are delivered onsite. Have a receiving procedures for time/temperature controlled for safety (TCS) foods and have attainable corrective actions based on supplied equipment and/ or a contingency plan in the event that unsafe food is delivered. Per PCC 8.04.110, operation should consider receiving hot held TCS food at 135F or above and 41F or below for cold TCS foods. TCS food items that have been temperature abused should not be accepted due to the fact that the extent of the temperature abuse and/ or unsafe food handling is unknown. Operation PICs should consider obtaining a probing thermometer for staff from any segment of the operation tasked with food safety and/ or meal services in order to use when TCS foods are received at site location.

Ensure no self-service of food. Have permitted commercial kitchen pre-plate all open food items until site location distributing the foods has obtained a permit.

All TCS food must come from approved sources such as restaurants, grocery stores, and any other

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permitted commercial kitchen. Recommend to discontinue receiving and providing foods that are prepared in a private come. Recommend to not accept foods that come from unknown sources. Recommend to discard all leftover food after each meal service.

Ensure that food contact surfaces (such as serving utensils) are cleaned, washed, and sanitized after each food service. Recommend to obtain sanitizing test strips to measure the concentration of sanitizing solution.

Ensure that all vomit/fecal incident areas are properly cleaned and disinfected. Recommend to follow the Clean Up Procedures for Vomit/Fecal Accident handout that was provided to facility. Recommend to review procedures with staff.

The large meeting room was a largely affected area, inspector recommends that carpet in the large meeting room be professionally steamed cleaned.

Provided the following handouts to PIC:

- Clean Up Procedures for Vomit/Fecal Accidents
- Wash Your Hands Signs (English, Spanish, Farsi, and Pashto versions)
- Nasty 5 and Big 6 Illnesses
- Think to Yourself Posters (FDA)

Inspector will email additional food safety handouts and temperature logs sheets to facility.

Corrective Action: Consider requiring organizations involved that have PICs in positions involving oversight of meal service, nutritional services, cleaning dining areas, and site directors to take a food handler course on basic food safety in order to better understand how to prepare food safely.

Action(s) Taken

Educational Material
Provided

Educational Material
Provided

General Actions Taken

Educational Material Provided: Handwashing handout provided. , When to Wash Hands handout provided. ; General Actions Taken: Photos/Video Taken for File

Closing Comments:

SIGNATURES:

N/A

N/A, Person in charge

LA-RS

Lauren Dinuer, Environmental Health Specialist