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The information provided in this publication is intended as a guide and does not replace state or federal laws. Individuals should continue to reference currently published laws for legal requirements.

**Introduction**

This publication is to help maple syrup processors meet the requirements for state laws for processing maple syrup. These laws include Wis. Admin. Code §§ ATCP 70 (Food Processing Plants), 75 (Retail Food Establishments) and 87 (Honey and Maple Syrup). The Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP) is the state regulatory agency responsible for managing these laws. More information is available on DATCP’s website at https://datcp.wi.gov/Pages/Programs_Services/FSMapleSyrup.aspx.

**Definitions**

**Degrees Brix:** The sugar content of a liquid.

**Maple Syrup:** The liquid food from concentrating and heating sap from a maple tree. Solids content is 66 percent or more by weight, or 66 degrees Brix, and does not contain added sweeteners.

Maple syrup can only contain salt, chemical preservatives, and defoaming agents. If there are any other flavorings or additives, it is not considered maple syrup. Products that are not considered maple syrup can be, but are not limited to: bourbon maple syrup, maple syrup candy, maple syrup fudge, cane syrup, sorghum syrup, table syrup, etc.

**Liquid maple products:** Contains maple syrup, concentrated maple sap (whether or not it is shelf-stable), and maple sap water (maple sap that has not been concentrated or has been concentrated to not more than 4 degrees Brix; this is a potentially hazardous food).

**Maple-derived water:** Water removed from maple sap by reverse osmosis or other methods.
Maple sap water: Sap from maple trees not concentrated to a solids content of more than 4 percent, or 4 degrees Brix, and is potentially hazardous food.

Potentially hazardous food: A food that requires time or temperature control for safety to limit pathogenic microorganism growth or toxin formation [Wis. Admin. Code § ATCP 70.02(22)].

Licensing

Food Processing Plant License
Facilities that make maple syrup and sell it wholesale to another processor or entity must have a food processing license unless it is exempt. Gathering maple sap water is not considered food processing and does not require a license.

Exemption
Your facility does not need a food processing plant license if the processor does all of the following:

- Sells the maple syrup or concentrated maple sap only to other processors for further processing.
- Sells less than $5,000 during the license year. This includes sales for the combined gross receipts from all maple syrup, non-shelf-stable concentrated maple sap, and shelf-stable concentrated maple sap.

  Note: This covers only wholesale product and the $5,000 does not include retail sales.

- Keeps a written record of every sale and retains that record for at least two years.
  - The record must be available for inspection and copying by DATCP upon request.
  - The record shall include the name and address of the purchasing processor, the date of sale, the amount of maple syrup or concentrated maple sap sold, and the sale price.
• Registers with DATCP before engaging in any processing activities in any license year ending March 31. A registration expires at the end of the license year. A processor shall register in writing using the maple sap processor registration form (F-fd-346).

**Retail Food Establishment License**
If you sell maple syrup to a consumer, you must have a retail food establishment license. You do not need a license if all of the following apply:

- The establishment only sells fresh fruits and vegetables, honey, cider, sorghum, or maple syrup.
- The operator of the establishment produces the product sold to the consumer.

**Food Warehouse License**
A processor must have a food warehouse license if it holds liquid maple product or maple-derived water for more than 24 hours at a location other than the food processing plant.

**General Requirements**
This section only applies to processors who are selling maple syrup for further processing or packaging. If a facility is pre-packaging or bottling maple syrup or shelf-stable concentrated maple sap that is intended to be sold at retail or directly to the consumer they shall follow Wis. Admin. Code § ATCP 70.04 (Food Processing Plants: Construction and maintenance) for general requirements.

Processors may apply for a variance for toilet facilities, handwash sinks in toilet facilities, handwash facilities for processing areas, and for cleaning facilities. Refer to the variance request section on page 11 for the common variance requests, how to file for a variance request, and what DATCP expects from the facility for a variance approval.

**Construction and Maintenance**
No requirements for impervious materials, floor coving, or light-colored walls. Coving means that the floor wall junctures are not at a 90-degree angle but cove for easier cleaning. The standard is a smooth, cleanable, and durable floor (gravel floors are not allowed as the processor must be able to effectively clean the floors). The facility must also have tightly sealed walls and ceiling.

**Lighting:** Must have at least 10-foot candles (108 lux) in all areas.

**Ventilation:** Ventilation must prevent condensation.

**Toilet facilities:** Each facility must have convenient access to a sanitary toilet, complying with applicable local law, or a self-contained portable toilet maintained in compliance with [Wis. Admin. Code § NR 113](https://law.legis.wisconsin.gov/adminRules/113) (Servicing Septic or Holding Tanks, Pumping Chamber, Grease Interceptors, Seepage Beds, Seepage Pits, Seepage Trenches, Privies, or Portable Restrooms).

**Handwashing:** Each facility must have a handwash sink. It must be conveniently located and shall be provided at all times with drinkable water under pressure, soap in a soap dispenser, a sanitary single service means of drying hands, and an easily cleanable covered trash bin.

**Cleaning facilities:** If equipment, utensils, or containers are cleaned or sanitized manually, a 3-compartment sink is required in the food processing area. This 3-compartment sink must be conveniently located. With the issuance of a variance, the operator may wash equipment in a 3-compartment sink at another DATCP or a DATCP agent-licensed location as long as all of the following are met:

- Written standard operating procedure including the following:
  - Name and location of the licensed facility.
  - Procedure for washing, rinsing, and sanitizing equipment.
- Procedure for sanitary transport of clean equipment back to the food processing plant.
- Maintain records documenting date, time, and concentration of sanitizer used when sanitizing equipment. Records shall be retained for at least one year after they are made and shall be available to DATCP for inspection and copying upon request.

**Plumbing systems and sewage disposal:** Wastewater with detergents (soap, and other cleaners) also known as greywater (does not contain fecal contamination) shall not be disposed of directly onto the ground. Greywater must be disposed of in a sanitary manner. This may include private on-site wastewater treatment system or a port-a-potty. Greywater in a facility may include water from a handwash sink or a 3-compartment wash sink.

  **Note:** If a facility is disposing of grey water directly onto the ground they must contact a DNR Wastewater Specialist to receive a permit. They can visit the following website for contact information: [https://dnr.wi.gov/topic/wastewater/PermitsStaff.html](https://dnr.wi.gov/topic/wastewater/PermitsStaff.html)

**Control of pests:** Insect, rodents, and other pests (including pets) shall be kept out of food processing areas.

**Fuel storage:** Fuel must be stored outside the facility.

  **Note:** Bulk fuel must be stored outside the facility. Enough fuel for one day’s production can be stored inside the facility if it is stored in a sanitary manner.

**Equipment and Utensils**

**General construction and maintenance:**

- Lead or lead-alloy soldering may not be used in the construction or repair of food-contact surfaces.
• Use of copper or brass: Copper and copper alloys such as brass and bronze may not be used in contact with a food that has a pH below 6. Maple syrup and some saps have a pH less than 6.

• A frame encasing an evaporator hood connected to a vent shall be made of smooth, cleanable, food-grade material.

• Filtering material such as socks and presses shall be in a clean condition before use. Filter papers may not be re-used.

**Covering of vessels containing maple products:** Vessels only holding maple sap before concentration of maple syrup do not need to be covered.

**Filtering and defoaming agents:** Filtering agents such as diatomaceous earth shall be non-toxic. If filtering agents or defoaming agents contain any of the major food allergens a processor must identify them on the label.

**Personnel Standards**

**Cleanliness:** Personnel are not required to wear hair or beard restraints.

**Processing, Storing, and Packaging Liquid Maple Product or Maple-derived Water**

**Temperature control:** Non-shelf-stable concentrated maple sap, maple sap water, and maple-derived water are potentially hazardous foods. These shall be handled, stored, and processed under temperature control if not being used to produce maple syrup (maple sap or maple sap water) or for cleaning as described in maple-derived water obtained by reverse osmosis treatment of maple sap.

**Maple-derived Water:** Maple-derived water obtained by the reverse osmosis treatment of maple sap may be used to clean evaporators or other equipment surfaces that contact maple sap before the maple sap is subjected to concentration by heating, if all of the following apply:
• The water does not have any objectionable odors, flavors, or slime. The sap shall be sampled daily for a physical evaluation but no record is required.

• Chemical treatment of maple-derived water may not use any chemical to suppress bacterial growth in water, or to prevent off-tastes or odors in water, unless that chemical is approved for that purpose by the U.S. Food and Drug Administration. Neither the chemical as applied, nor any compound produced by the chemical application, may contribute to the adulteration of food.

• The storage tank shall be emptied, cleaned, and sanitized at least once every 24 hours. If you are storing for more than 24 hours, the temperature of the maple-derived water must be less than 45°F or greater than 145°F.

• Hoses used in conjunction with this type of water shall be clearly identified.

If the facility does not follow all of the above requirements and wants to use maple-derived water to clean evaporators or other equipment they must meet the rules for reclaimed water found in Wis. Admin. Code § ATCP 70.07(3)(b).

Transferring Water to Maple Syrup Facility

If a facility is transferring water to be used at their facility for operations water or ingredient water from another location, the processor must follow requirements for water and drinkable liquids transferred in bulk.

Water and drinkable liquids transferred in bulk:

• Water transported to a food processing plant in a bulk tanker or bulk container, for use as an ingredient or in other plant operations shall be drinkable and shall be obtained from a source that complies with Wis. Admin. Code §§ NR 811 (Requirements for the Operation and Design of Community Water Systems) or 812 (Well Construction and Pump Installation).
• Whenever drinkable water or another drinkable liquid is transported to or from a food processing plant in a bulk tanker or bulk container:
  o It shall be loaded, transported, and unloaded in a sanitary manner that prevents contamination. The bulk tanker or bulk container shall be thoroughly cleaned and sanitized before being filled. Suitable pumps, hoses, and fittings shall be used to transfer drinkable water and drinkable liquids to and from bulk tankers and bulk containers.
  o The bulk tanker or bulk container and each of its fittings and equipment shall meet all of the following requirements:
    ▪ Constructed properly and maintained to prevent contamination of the drinkable water and liquid. Food contact surfaces shall comply with Wis. Admin. Code § ATCP 70.06(2).
    ▪ Cleaned, sanitized, and inspected on a routine basis.
    ▪ May not transport materials that may contaminate drinkable water or liquid that is subsequently transported in the bulk tanker or bulk container.
    ▪ Sealed to protect the drinkable water or liquid from contamination during transit.
    ▪ Stored properly and serviced to prevent contamination. When not in use, pumps, hoses, and fittings shall be properly maintained, capped, stored, and protected from contamination.

Recall Plan
All food processing plants are required to have a written recall plan.

Grading Requirement
If a facility has a food processing plant license, they must label their maple syrup product as one of the following: Grade A, processing grade, or substandard.
Note: If the product is being sold as bulk to be further processed it may be labeled as ungraded.

If a facility does not hold a food processing plant license, they must label their product as one of the following: Grade A, processing grade, substandard, or ungraded.

**Grade A requirements:** Maple syrup labeled as Grade A must meet the following characteristics:

- Is not more than 68.9 percent solids content by weight, or 68.9 degrees Brix.
- Has good uniform color.
- Has good flavor and odor, and intensity of flavor, or maple taste, normally associated with the color class for Grade A maple syrup.
- Is free from off flavors and odors considered as damage.
- Is free from cloudiness, turbidity, sediment, and is clean.

**Grade A must be accompanied by descriptive information:** The color class of Grade A maple syrup is determined by the percent of transmittance of light at a wavelength of 560 nanometers through the syrup, as measured with a spectrophotometer using matched square optical cells having a 10 mm light path. The color value is expressed as percent of light transmission, as compared to analytical grade glycerol fixed at 100 percent. Percent transmittance is denoted by %Tc. Any method that provides equivalent results may be used to determine Grade A maple syrup color class. Grade A maple syrup color classes and corresponding flavor descriptors are shown in Table 1.

<table>
<thead>
<tr>
<th>Grade A Color Class</th>
<th>Flavor Descriptor</th>
<th>Percent Light Transmittance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Golden</td>
<td>Delicate</td>
<td>At least 75.0</td>
</tr>
<tr>
<td>Grade</td>
<td>Color Class</td>
<td>Flavor</td>
</tr>
<tr>
<td>------------</td>
<td>-------------</td>
<td>---------</td>
</tr>
<tr>
<td>Amber</td>
<td>Rich</td>
<td>50.0–74.9</td>
</tr>
<tr>
<td>Dark</td>
<td>Robust</td>
<td>25.0–49.9</td>
</tr>
<tr>
<td>Very Dark</td>
<td>Strong</td>
<td>Less than 25.0</td>
</tr>
</tbody>
</table>

**Processing grade:** Maple syrup labeled as processing grade shall be packed in containers holding at least 5 gallons (18.925 liters) and shall not be packaged in containers smaller than 5 gallons (18.925 liters) for retail sale. Processing grade maple syrup has all of the following characteristics:

- Fails to meet the requirements for Grade A maple syrup.
- Possesses a fairly good characteristic maple taste.
- Is fairly clean and fairly free of damage, turbidity, or cloudiness.
- May be in any color class and have any percent light transmittance.
- Has not more than 68.9 percent solids content by weight, or not more than 68.9 degrees Brix.
- May contain off flavors and odors.
- May have a very strong taste.

**Substandard grade:** Maple syrup labeled as substandard does not meet the requirements for processing grade.

**Ungraded:** Any maple syrup that does not have a grade designation.

**Geographical Designation**

Providing a geographical designation for your product is optional.

**Made in Wisconsin:** A facility may label their product with a Wisconsin designation (such as “Made in Wisconsin”) if the maple sap was concentrated in Wisconsin to meet the definition of maple syrup.

**Bottled or Packaged in Wisconsin:** A facility may label their product as “Bottled in Wisconsin” or “Packaged in Wisconsin” if bottling or packaging were done in Wisconsin.

**Food Packaging and Labeling**
Packaged food shall be packaged and labeled according to all of the following, as applicable:

- If the packaged food contains a major food allergen, the ingredient statement on the package shall disclose the common name of the major food allergen. The disclosure shall be equivalent in size and prominence to the rest of the ingredient statement. If an allergen originates from fish, crustacean shellfish, or tree nuts, the disclosure shall include the common name of the source species.

**Note:** For example, if a food product includes an allergen that originates from fish, the ingredient statement must disclose the common species name such as bass, flounder, or cod. If the allergen originates from crustacean shellfish, the ingredient statement must disclose the common species name such as crab, lobster, or shrimp. If the allergen originates from tree nuts, the ingredient statement must disclose the common species name such as almond, pecan, walnut, or coconut.

More information about the legal requirements for packaging and labeling can be found in Wis. Admin. Code § ATCP 70.10(5).

**How to Request a Variance for Maple Syrup Processing Facilities**

If you cannot meet a requirement, work with your assigned sanitarian to see if you can request a variance. Listed below are examples of common variances related to a maple syrup facility, including the minimal expectation from the facility for an approval.

**Using a Portable Toilet or Port-a-Potty**

Cite the specific state administrative code you are requesting a variance for.

Wis. Admin. Code § ATCP 70.04(7)(a)(1-3) indicates the toilet rooms constructed, substantially reconstructed, or extensively altered after June 30, 1989, shall be separately vented to the outside, shall be
equipped with an exhaust fan capable of creating negative pressure within the toilet facility, and shall not open directly into a food processing area.

**Explain the specific practice, construction, and other conditions you are requesting be covered with this request.**
Using a portable toilet or port-a-potty in a room that is not separately vented to the outside, does not have an exhaust fan or create negative pressure and does not open directly into the food processing area.

**List the products and product lines or equipment to be included in this variance:**
Portable toilet or port-a-potty.

**Justification: Clearly state why compliance with the code cannot be obtained without a variance.**
With the rustic location of our facility, it is not feasible to construct a toilet room to meet the requirements listed above.

**Demonstrate how your request provides an equivalent degree of food safety as the code cited above.**
Our portable toilet or port-a-potty meets the requirements of NR 113. The portable toilet or port-a-potty is located in a toilet room or outside so that it does not open directly into the processing area.

**Toilet Room Does Not Contain a Handwash Sink**
*Cite the specific state administrative code you are requesting a variance for.*
Wis. Admin. Code § ATCP 70.04(7)(b) indicates that handwashing facilities shall be located in or adjacent to every toilet room.

**Explain the specific practice, construction, and other conditions you are requesting be covered with this request.**
Facility does not have a handwash sink adjacent to or in the toilet room.

**List the products and product lines or equipment to be included in this variance:**
Handwash sink in the processing area.
Justification: Clearly state why compliance with the code cannot be obtained without a variance.
Toilet room is located outside of the facility. The room does not have running water or room for a handwash sink.

Demonstrate how your request provides an equivalent degree of food safety as the code cited above.
Either of the following can be done to meet this section:
• Facility has a handwash sink in the processing area that meets requirements of Wis. Admin. Code § ATCP 87.14(5), including the following:
  o Handwash sink located in the processing room
  o Drinkable water under pressure
  o Soap in a soap dispenser
  o Sanitary single-service means of drying the hands
  o Easily cleanable covered trash bin
  o Sink is designated for washing hands and cannot be used to clean, sanitize, or store equipment of utensils
  o Water used must meet the requirements of Wis. Admin. Code §§ ATCP 87.22 or 87.24.
• Facility has a handwash sink in the processing area that meets requirements of Wis. Admin. Code § ATCP 70.04(9). Including the following:
  o Handwash sink located in the processing area
  o Serviced by hot and cold running water provided under pressure through a mixing valve or combination faucet, or by drinkable and tempered water
  o Sink that is not hand-operated. If a self-closing or metering faucet is used, that faucet shall provide a flow of water for at least 15 seconds without any need to reactivate the faucet
  o Soap in a soap dispenser
  o Sanitary single-service means of drying hands
  o Easily cleanable covered trash bin
  o Sink is designated for washing hands and cannot be used to clean, sanitize, or store equipment of utensils

Handwash Sink using a Container for Handwashing instead of Hot and Cold Running Water
Cite the specific state administrative code you are requesting a variance for.
Wis. Admin. Code § ATCP 70.04(9)(a) indicates that handwashing sinks with available hot and cold running water shall be provided for use by all persons working in food processing areas.

Explain the specific practice, construction, and other conditions you are requesting be covered with this request.
Facility does not have a handwash sink with hot and cold running water.

List the products and product lines or equipment to be included in this variance:
Container with water that will provide water for the handwashing sink.

Justification: Clearly state why compliance with the code cannot be obtained without a variance.
Facility does not have a well or municipal water system on site.

 Demonstrate how your request provides an equivalent degree of food safety as the code cited above.
Facility has a water container of at least a 5 gallon capacity with non-self-closing spigot or valve that allows for a continuous flow of water over hands.

The facility can transfer water in bulk from another location or they may use maple-derived water. Below are the requirements for each:
• Transfer of water in bulk from another location requires the facility to follow Wis. Admin. Code §§ ATCP 87.22 and 70.07(6). The requirements are:
  o Water from a source that complies with Wis. Admin. Code §§ NR 811 or 812, and 809.
  o If a privately owned water system is used, the operator shall sample that water at least once annually for compliance with microbiological drinking water standards and keep records for at least one year.
  o Meet requirements of Wis. Admin. Code § ATCP 70.07(6)
    ▪ Water shall be loaded, transported, and unloaded in a sanitary manner that prevents contamination. The bulk tanker or bulk container shall be thoroughly
cleaned and sanitized before being filled. Suitable pumps, hoses, and fittings shall be used to transfer drinkable water and liquids to and from bulk tankers and bulk containers.

- Whenever drinkable water or another drinkable liquid is transported to or from a food processing plant in a bulk tanker or bulk container, the bulk tanker or bulk container and each of its fittings and equipment shall meet all of the following requirements:
  - It shall be properly constructed and maintained to prevent contamination of the drinkable water and liquid. Food contact surfaces shall comply with Wis. Admin. Code § ATCP 70.06(2).
  - It shall be cleaned, sanitized, and inspected on a routine basis.

The facility can transfer water in bulk from another location or they may use maple-derived water. Below are the requirements for each:

- Transfer of water in bulk from another location requires the facility to follow Wis. Admin. Code §§ ATCP 87.22 and ATCP 70.07(6). The requirements are:
  - Water from a source that complies with Wis. Admin. Code §§ NR 811 or 812, and 809
  - If a privately owned water system is used, the operator shall sample that water at least once annually for compliance with microbiological drinking water standards and keep records for at least one year
  - Meet requirements of Wis. Admin. Code § ATCP 70.07(6)
    - Water shall be loaded, transported, and unloaded in a sanitary manner that prevents contamination. The bulk tanker or bulk container shall be thoroughly cleaned and sanitized before being filled. Suitable pumps, hoses, and fittings shall be used to transfer drinkable water and liquids to and from bulk tankers and bulk containers.
    - Whenever drinkable water or another drinkable liquid is transported to or from a food processing
plant in a bulk tanker or bulk container, the bulk tanker or bulk container and each of its fittings and equipment shall meet all of the following requirements:

- It shall be properly constructed and maintained to prevent contamination of the drinkable water and liquid. Food contact surfaces shall comply with Wis. Admin. Code § ATCP 70.06(2).
- It shall be cleaned, sanitized, and inspected on a routine basis.
- It may not be used to transport materials that may contaminate drinkable water or liquid that is subsequently transported in the bulk tanker or bulk container.
- It shall be effectively sealed to protect the drinkable water or liquid from contamination during transit.
- It shall be properly stored and serviced to prevent contamination. When not in use, pumps, hoses, and fittings shall be properly maintained, capped, stored, and protected from contamination.

- If using maple-derived water the water must meet the following requirements for Wis. Admin. Code § ATCP 87.24:
  - Maple-derived water obtained by the reverse osmosis treatment of maple sap may be used to clean evaporators or other equipment surfaces that contact maple sap before the maple sap is subjected to concentration by heating if all of the following apply:
    - The water does not have any objectionable odors, flavors, or slime. The sap shall be sampled daily for physical evaluation but no record is required.
    - Chemical treatment of maple-derived water shall comply with Wis. Admin. Code § ATCP 70.07(4).
    - The storage tank shall be emptied, cleaned, and sanitized at least once every 24 hours or if storing more than 24 hours the temperature of the maple-
derived water must be less than 45°F or greater than 145°F
- Hoses used in conjunction with this type of water shall be clearly identified.

If the facility does not follow all of the above requirements and wants to use maple-derived water to clean evaporators or other equipment they must meet Wis. Admin. Code § ATCP 70.07(3)(b).

Facility does not have a 3-Compartment Sink on Site

Cite the specific state administrative code you are requesting a variance for.
Wis. Admin. Code § ATCP 70.04(10)(a) indicates that if equipment, utensils, or food packages are cleaned or sanitized manually, the food processing plant shall be equipped with a sink that has at least 3 compartments for washing, rinsing, and sanitizing equipment and utensils.

Explain the specific practice, construction, and other conditions you are requesting be covered with this request.
Facility does not have a 3-compartment sink in the processing area.

List the products and product lines or equipment to be included in this variance:
Equipment that needs to be manually washed in a 3-compartment sink.

Justification: Clearly state why compliance with the code cannot be obtained without a variance.
Facility does not have hot and cold running water to properly wash, rinse, and sanitize equipment.

Demonstrate how your request provides an equivalent degree of food safety as the code cited above.
Facility is using a 3-compartment sink at another facility in Wisconsin that is licensed by DATCP or a DATCP agent.

The facility has a written standard operating procedure that includes the following:
- Name and location of the licensed facility.
- Procedure for washing, rinsing, and sanitizing equipment.
• Procedure for sanitary transfer of clean equipment back to the food processing plant. Maintain records documenting date, time, and concentration of sanitizer used when sanitizing equipment. Records shall be retained for at least one year after they are made and shall be available to DATCP for inspection and copying upon request.

Using a 2-Compartment Sink for Washing and Rinsing Equipment and a Finishing Pan for Sanitizing

Cite the specific state administrative code you are requesting a variance for.
Wis. Admin. Code § ATCP 70.04(10)(a) indicates that if equipment, utensils, or food packages are cleaned or sanitized manually, the food processing plant shall be equipped with a sink that has at least 3 compartments for washing, rinsing, and sanitizing equipment and utensils.

Explain the specific practice, construction, and other conditions you are requesting be covered with this request.
Facility does not have a 3-compartment sink in the processing area.

List the products and product lines or equipment to be included in this variance:
Equipment that needs to be manually washed in a 3-compartment stainless steel sink, 2-compartment handwash sink, and finishing pans.

Justification: Clearly state why compliance with the code cannot be obtained without a variance.
An effective way of sanitizing equipment according to Wis. Admin. Code § ATCP 70.11(1)(a) is immersion for at least 30 seconds in clean water at a temperature of at least 170°F. Without having hot running water at this facility using a 3-compartment is not adequate.

Demonstrate how your request provides an equivalent degree of food safety as the code cited above.
Water used must meet the requirements of Wis. Admin. Code §§ ATCP 87.22 or 87.24.
Facility has a 2-compartment sink that meets requirements of Wis. Admin. Code § ATCP 70.04(1)(a) including the following:
• Sinks shall be conveniently located and adequate in number.
• Sinks shall be constructed of stainless steel or other approved materials.
• Finishing pans meet the following requirements:
  o The finishing pan meets requirements of Wis. Admin. Code § ATCP 70.06(2), meaning there are no scratches, blemishes, or defects in the finishing pan that could harbor bacteria during processing.
  o Prior to cleaning and sanitizing equipment the finishing pans must be cleaned and sanitized. The operator may not sanitize equipment while processing sap.
  o Equipment shall be cleaned and sanitized to meet Wis. Admin. Code § ATCP 87.26(6)(a) meaning the equipment is cleaned as often as necessary to remove visible debris.

The equipment shall be sanitized in compliance with Wis. Admin. Code § ATCP 70.11(1)(a), meaning it is exposed to 170°F (77°C) water for no less than 30 seconds – or another sanitizing treatment specified in Wis. Admin. Code § ATCP 75 Appendix – Wisconsin Food Code.