



STANDARD OPERATING PROCEDURE

Time as Public Health Control Using Color-Coded Dots

Establishment: Walker Rotary Club Cooking Trailer

SOP number: TPHC-01

Effective date: 7/1/2026

Approved by: Douglas Cook

Person in Charge: Douglas Cook, CFPM

1. Purpose

This procedure establishes a safe and consistent method for using **Time as Public Health Control (TPHC)** for cooked food placed in serving chafers.

Colored dots will be used as the sole identifier on each food pan. Each dot color will correspond to a specific mandatory discard time shown on a posted daily color-time chart.

Food placed under this procedure must be served or discarded within four hours after it is removed from temperature control.

2. Foods Covered

This procedure applies only to the following approved cooked foods:

- Breaded pollock
 - Chicken tenders
 - Chicken drumettes
 - Cheese curds
 - French fries
 - Other foods approved by the regulatory authority and added to this SOP
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3. Definitions

Time as Public Health Control: A food-safety method in which elapsed time, rather than continuous temperature control, is used to limit bacterial growth.

Start time: The time food is removed from temperature control and placed into a chafer pan under TPHC.

Discard time: The latest time by which the food must be served or discarded.

Color dot: A removable, solid-color adhesive dot attached to the outside flange of the food pan.

Daily color-time chart: The posted chart that assigns each dot color to a specific discard time for that event.

4. Required Materials

The following materials must be available before TPHC is used:

- Clean and sanitized food pans
- Clean and calibrated food thermometer
- Removable solid-color adhesive dots
- Laminated daily color-time chart
- Dry-erase marker
- Accurate clock visible to workers
- Waste container for discarded food
- Copy of this SOP

Dots must be large enough to be plainly visible. One-inch dots are preferred.

5. Establishing the Daily Color Schedule

Before food service begins, the Person in Charge will complete and post the daily color-time chart at the chafer station.

Each color will represent one specific discard time.

Sample Daily Color-Time Chart

Dot color	Mandatory discard time
Yellow	1:00 p.m.
Orange	1:30 p.m.
Red	2:00 p.m.
Pink	2:30 p.m.
Purple	3:00 p.m.
Blue	3:30 p.m.
Green	4:00 p.m.
White	4:30 p.m.

The actual times will be entered for each event based on the anticipated service period.

The chart must include:

- Event name
- Event date
- Color assignments
- Discard times
- Person in Charge's initials

The chart must remain posted and visible throughout food service.

A color may not represent more than one discard time during the same event unless:

1. Every pan bearing that color from the earlier period has been removed;
2. Every earlier dot of that color has been discarded;
3. The Person in Charge changes the posted chart; and
4. All affected workers are informed of the new assignment.

Whenever practical, colors will not be reused during the same event.

6. Beginning TPHC

The fryer operator or designated food worker will complete the following steps for each new pan:

1. Cook the food to its required final cooking temperature.
2. Place the cooked food into a clean and sanitized food pan.
3. Measure the temperature of a representative piece of food with a clean and sanitized probe thermometer.
4. Confirm that the food is **135°F or above** when TPHC begins.
5. Note the actual time that the food is placed under TPHC.
6. Add four hours to determine the maximum legal discard time.
7. Round the discard time down to the nearest time shown on the daily color chart.
8. Select the dot color corresponding to that discard time.
9. Attach the colored dot to the outside flange of the actual food pan.
10. Place the pan into the chafer.

No time or other information will be written on the dot.

Example

Food is placed under TPHC at 11:12 a.m.

- Four-hour limit: 3:12 p.m.
- Available chart times: 3:00 p.m. and 3:30 p.m.
- The deadline must be rounded down to 3:00 p.m.
- If purple represents 3:00 p.m., a purple dot is applied.

The 3:30 p.m. color may not be used because it would exceed four hours.

7. Dot Placement

The colored dot must be placed:

- On the outside flange or rim of the removable food pan;
- Where it is visible to the chafer attendant;
- Away from the food-contact surface;
- Away from direct flame;
- Where steam or condensation is least likely to loosen it.

The controlling dot must be attached to the food pan.

Dots placed only on the following are not acceptable:

- Chafer lid
- Chafer frame
- Serving utensil
- Table
- Product sign
- Fuel holder

This prevents the food from becoming separated from its time identifier if lids or utensils are exchanged.

8. Food Below 135°F at the Start

Food below 135°F may not begin the four-hour hot-food TPHC procedure.

The worker must immediately notify the Person in Charge.

The food must be:

- Correctly reheated using approved cooking equipment, when permitted;
- Immediately served if appropriate and approved by the Person in Charge; or
- Discarded.

A chafer may not be used to slowly reheat food.

The four-hour clock may not begin until the food meets the required starting condition.

9. Monitoring During Service

The chafer attendant will:

1. Keep the daily color-time chart posted and visible.
2. Observe the clock throughout service.
3. Check that every TPHC food pan has a visible colored dot.
4. Confirm that every color in use appears on the daily chart.
5. Keep lids closed except during active service.

6. Use a separate serving utensil for each product.
7. Prevent workers from changing or removing dots.
8. Notify the Person in Charge before each discard deadline.
9. Remove all pans bearing an expiring color at the designated time.

Temperatures may be taken for operational or quality purposes, but a later temperature reading does not:

- Restart the four-hour period;
- Extend the discard time;
- Permit a new color to be assigned; or
- Return the food to conventional hot holding.

Time remains the controlling food-safety measure once TPHC begins.

10. Batch Handling and Pan Replacement

Preferred procedure

Food will be produced in small batches.

When a pan becomes low:

1. Stop adding food to that pan.
2. Serve the remaining food before its color deadline.
3. Remove the pan.
4. Replace it with a clean pan containing a new batch.
5. Assign the new batch its own color based on its own discard deadline.

Topping off pans

Fresh food should not be placed on top of older food.

If fresh food is added to an existing pan:

- The entire pan retains the older color;
- The older discard deadline applies to all food in the pan; and
- A later color may not be substituted.

Example

An existing pan has a purple dot representing a 3:00 p.m. discard time.

Fresh food that would normally receive a green dot is added to the pan.

The entire pan remains purple and must be served or discarded by 3:00 p.m.

11. Transferring Food Between Pans

Food should not be transferred from one pan to another once TPHC has begun.

If a transfer is necessary:

1. The original color must remain with the food.
2. The same color dot must be placed on the receiving pan before the food is transferred.
3. The original discard deadline remains unchanged.

A transfer does not restart or extend the time period.

If the original color cannot be verified, the food must be discarded.

12. Discard Procedure

At each posted discard time, the chafer attendant or Person in Charge will:

1. Announce the expiring color.
2. Inspect every chafer and serving pan.
3. Remove every pan bearing that color.
4. Discard all food remaining in those pans.
5. Remove and discard the colored dots.
6. Send reusable pans for washing, rinsing and sanitizing.

Example:

“It is 3:00 p.m. All purple-dot pans must be removed now.”

Food may not remain in service after its assigned color deadline.

13. Mandatory Corrective Actions

Condition	Required action
Pan has no colored dot	Discard the food
Dot color is not on the posted chart	Discard the food
Daily color chart is missing	Stop using TPHC until the chart is posted; discard food whose deadline cannot be verified
Dot has fallen off and the color cannot be conclusively verified	Discard the food
Two colors appear on one pan	Use the earlier discard deadline
Earlier color cannot be determined	Discard the food
Discard deadline has passed	Discard immediately
Worker changes a dot to a later color	Discard unless the original earlier deadline is conclusively known and has not passed
Fresh food is added to older food	Retain the older color and earlier deadline
Food starts below 135°F	Do not begin TPHC; correct immediately or discard
Color would allow more than four hours	Assign an earlier color or discard
Food is moved to another pan without its color	Discard unless the original color can be conclusively verified
Worker is uncertain about the color	Stop service from the pan and contact the Person in Charge

When in doubt, discard the food.

14. Prohibited Practices

Workers may not:

- Remove a dot before the pan is empty or discarded;
 - Replace a dot with a later color;
 - Reset the four-hour period;
 - Assign a new color after checking the food temperature;
 - Refrigerate expired food for later use;
 - Reheat food to restart the time period;
 - Return food to conventional hot holding after TPHC has begun;
 - Carry food over to another event;
 - Take expired food home;
 - Donate expired food;
 - Serve food after the color deadline;
 - Use an unmarked pan.
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15. Chafer Heat

Once a pan is placed under TPHC, elapsed time is the controlling food-safety measure.

Any heat supplied by the chafer is for food quality only and does not:

- Extend the four-hour limit;
- Restart the holding period;
- Change the assigned color; or
- Eliminate the discard requirement.

Chafer operation will follow the direction accepted by the regulatory authority.

16. Employee Training

Before working at the chafer station, each worker must be trained to understand:

- What TPHC means;
- That the dot represents the mandatory discard time;

- How to read the daily color-time chart;
- That dots may not be changed;
- That fresh food does not reset an older pan;
- That no dot means discard;
- That passed colors must be discarded;
- That questions must be referred to the Person in Charge.

Training may be provided verbally at the pre-event meeting.

The Person in Charge will verify understanding before assigning a worker to the chafer station.

17. Person in Charge Responsibilities

The Person in Charge will:

- Ensure this SOP is available at the trailer;
- Complete and post the daily color-time chart;
- Confirm that the food list is approved;
- Confirm thermometer accuracy;
- Ensure adequate dot colors are available;
- Assign trained workers;
- Monitor compliance during service;
- Enforce all discard deadlines;
- Prevent colors from being changed or reused incorrectly;
- Take corrective action when the procedure is not followed;
- Make the SOP available to the regulatory authority upon request.

18. Records

The following will be retained with the trailer's food-safety records:

- Current TPHC SOP;
- Approved food list;
- Blank daily color-time charts;
- Completed daily color-time charts, when required by the Person in Charge or regulatory authority;

- Employee training records, if maintained.

Unless otherwise directed by the inspector, the colored dot and posted daily chart constitute the operational identification system.

DAILY TPHC COLOR-TIME CHART

Event: _____

Date: _____

Person in Charge: _____

Dot color	Discard by	In use
Yellow	_____	☐
Orange	_____	☐
Red	_____	☐
Pink	_____	☐
Purple	_____	☐
Blue	_____	☐
Green	_____	☐
White	_____	☐
Brown	_____	☐
Black	_____	☐

PIC initials: _____

CHAFER-STATION POSTING

COLOR DOT TIME CONTROL

- Check the color chart.
- The dot shows when the pan must be discarded.
- Never remove or change a dot.
- Never replace an old color with a later color.
- Do not top off an older pan.
- No dot means discard.
- At the designated time, remove every pan with that color.
- When uncertain, stop serving and contact the Person in Charge.