

# **MOBILE FOOD UNIT OPERATION GUIDE**

## Guidelines for Mobile Food Unit Establishments



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## **Definitions**

***Approved:*** Means acceptable to the Regulatory Authority based on a determination of conformity with principles, practices, and generally recognized standards that protect public health.

***Commissary:*** A food establishment used for preparing, fabricating, packaging, and storage of food or food products for distribution and sale through the food establishment's own food establishment outlets

***Consumer:*** A person who is a member of the public, takes possession of food, is not functioning in the capacity of an operator of a food establishment or food processing plant, and does not offer the food for resale.

***Easily Cleanable:*** A non-absorbent surface that allows effective removal of soil by normal cleaning methods.

***Equipment:*** An article that is used in the operation of a food establishment. Includes, but is not limited to, items such as a freezer, grinder, hood, ice maker, meat block, mixer, oven, cooler, scale, sink, slicer, stove, table, thermometer, and vending machine.

***Food:*** A raw, cooked, or processed edible substance, ice, a beverage, an ingredient used or intended for use or sale in whole or in part for human consumption, or chewing gum

***Food-Contact Surface:*** A surface of equipment or a utensil with which food normally comes into contact with and from which may drain, drip, or splash into a food, or onto a surface normally in contact with food.

***Food Establishment:*** An operation that stores, prepares, packages, serves, vends or otherwise provides food for human consumption. Further defined in IAC 481-30.2

***Hazard:*** A biological (microorganism), chemical (cleansers, pesticides), or physical (fingernail, plastic) property that may cause an unacceptable consumer health risk.

***Home Base of Operation:*** Where the licensed mobile unit will be stored when not in operation.

***License holder:*** An individual, corporation, partnership, governmental unit, association or any other entity to whom a license was issued under Iowa Code chapter 137C, 137D or 137F.

***Mobile food unit:*** A food establishment that is self-contained, with the exception of grills and smokers, and readily movable, which either operates up to three consecutive days at one location or returns to a home base of operation at the end of each day.

***Packaged:*** Means Bottled, canned, cartoned, securely bagged, or securely wrapped, whether packaged in a food establishment or a food processing plant.

***Permit:*** The document issued by the Regulatory Authority that authorizes a person to operate a food establishment.

**Plan Review:** Conducted by the Regulatory Authority by reviewing the menu, equipment list, and layout of the unit for several reasons; 1) To make sure the unit will be in compliance with the regulations, 2) to prevent any misunderstandings by the applicant/owner, and 3) allows the RA to become familiar with the operation, the owner, and potential for future problems before the unit is permitted.

**Potentially hazardous food:** A food that is natural or synthetic and is in a form capable of supporting the rapid and progressive growth of infectious or toxigenic microorganisms, or the growth and toxin production of clostridium botulinum. “Potentially hazardous food” includes an animal food that is raw or heat-treated, a food of plant origin that is heat-treated or consists of raw seed sprouts, cut melons, and garlic and oil mixtures.

**Pushcart:** A non-self-propelled vehicle food establishment limited to serving non-potentially hazardous foods or commissary-wrapped foods maintained at proper temperatures or precooked foods that require limited assembly, such as frankfurters.

**Pre-packaged Food:** Food that is packaged or made up in advance in a container, or wrapped and ready for offer to the consumer. Additional licensure may be needed.

**Ready-To-Eat Food:** Food that is in a form that is edible without washing, cooking, or additional preparation. Examples are sandwiches, uncooked fruits and vegetables, foods on a buffet, and sushi.

**Regulatory Authority:** The local, state, or federal enforcement body or authorized representative having jurisdiction over the food establishment.

**Self-contained mobile food unit:** A vehicle on wheels which meets the same requirements as a permanent facility where all the food preparation is done on the unit. At a minimum the unit must have: Mechanical hot and cold holding units, gas or electric cooking equipment, water tanks, hand sinks, three compartment sinks, storage for all food, single service items, and cleaning supplies.

**Servicing Area:** An operation base location to which a mobile food establishment returns regularly for such things as vehicle and equipment cleaning, discharging liquid or solid wastes, and refilling water tanks.

**Temporary food establishment:** means a food establishment that operates for a period of no more than 14 consecutive days in conjunction with a single event or celebration. An “event or celebration” is a significant occurrence or happening sponsored by a civic, business, educational, government, community, or veterans’ organization and may include athletic contests. For example, an event does not include a single store’s grand opening or sale

**Warehouse:** A commercial operation that stores food for human consumption, and provides food for sale or distribution to other business entities such as food processing plants or food establishments. Potentially hazardous, as well as non-potentially hazardous food may be stored.

**Utensil:** A food-contact tool or container used in the storage, preparation, transportation, dispensing, sale, or service of food. Examples are tongs, ladles, gloves, thermometers, and deli paper.

# Chapter 1: Basic Information

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## **A summary of the Food Sanitation Rules relating to mobile food units**

The Mobile Food Unit Operational Guide is intended to help you set up and operate your mobile food unit in a safe and sanitary manner. By focusing on foodborne illness risk factors and public health interventions the possibility of foodborne illnesses will be greatly reduced in your operation. While this guide provides some detailed information about operating a mobile food unit, it does not contain all the requirements for your unit. Inspection standards for Food Establishments can be found in the Iowa Code Chapter 137F and Iowa Administrative Code Chapter 481-30 and 481-31 and is available at: <http://www.dia.iowa.gov/page29.html>

## **What is a Mobile Food Unit?**

Mobile food units are a type of annually licensed food establishment that are a readily movable vehicle (on wheels) that is self-propelled (driven), or can be pulled or pushed down a sidewalk or street. They vary in equipment and design, depending upon the type of food and service intended by the operator. Pre-approved menu items may be prepared or processed on the vehicle which is used to sell and dispense food to the consumer. Mobile food units may park and operate up to three consecutive days at one location or return to a home base of operation at the end of each day.

## **Home Base and Service Area Requirements**

Mobile food units must return to their Home Base of Operation a minimum of every three days for thorough cleaning and sanitizing of the facility, disposal of waste water, and general maintenance of the unit. Mobile units may need to return to their home base of operation on a more frequent basis depending on business demands. Water supplied to the mobile food unit shall be from a public water source. If water is supplied from a private source, the water must be tested annually with test results provided to the regulatory authority. If on-site power is required for the mobile unit to function overnight, then the plug shall be secured to an outlet to prevent loss of power. If not secured, all perishable foods shall be removed and stored in a licensed commissary. Any storage or handling of food at a home base would require a license.

A home base of operation may include a licensed Commissary or licensed Warehouse. The mobile unit permit holder and the commissary or warehouse permit holder must be the same person or company.

A home base of operation may include a servicing area. A servicing area may be an unlicensed facility if there is no food preparation or storage of any kind. This type of service area must be pre-approved by the regulatory authority during the plan review and pre-operational inspection. A mobile food unit may have the ability to operate without a commissary. The decision will be made by the Environmental Health Specialist during the plan review and pre-operational inspection.

# How is a Mobile Food Unit Classified?

There are four types of mobile food units. The mobile food unit classifications are based on the menu. A mobile unit can serve menu items within its classification number or below. For example a Class III unit may also sell items allowed in a Class II and Class I.

A mobile unit cannot serve menu items from a higher classification number. Example, a Class III unit cannot serve menu items from a Class IV unit.

Training and equipment requirements are located in table 1.

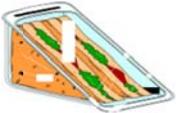
## **Class I Non-Refrigerated Vending Units-** These units can serve **only intact, non-potentially hazardous commercially prepackaged food and drinks.**



No preparation or assembly of food or drinks may take place on the unit.

Examples include chips, crackers, cookies, soda, and sweets in manufacturers packaging. These units **DO NOT** require a permit to operate but may require an additional warehouse license.

## **Class II Refrigerated or Hot Vending Units-** These units serve **potentially and non-potentially hazardous commercially Prepackaged foods.**



No preparation, assembly, cooking, or open packages of food or beverage on the unit is allowed. The food items may be prepared commercially or in the permit holder's licensed restaurant or commissary. Examples: packaged sandwiches, ice cream bars, individually wrapped and cooked hot dogs.

## **Class III** These units serve **potentially and non-potentially hazardous packaged foods and unpackaged foods with limited assembly.** Preparation, assembly, or cooking of raw animal foods is *not allowed* on this unit. Commercial or Commissary prepared foods may be *reheated* on the unit. Self-service by customers of unpackaged food is *not allowed*. Menu items must be approved and processes must be reviewed at a pre-operational inspection. Examples: Pushcart Operations, packaged salads, hot dogs, shaved ice.



## **Class IV** These units serve **potentially and non-potentially hazardous foods that are prepared, cooked, cooled, or reheated, and assembled on the unit** using pre-cooked and/or raw products. The menu is unlimited, but processes must be reviewed at a pre-operational inspection. Examples: Self-Contained Mobile Food Units, Food Trucks. All meats, fish, poultry, plant foods, and dairy products.



**Table 1: Mobile Food Unit General Requirements and Limitations**

<b>Requirements</b>	<b>Class I</b>	<b>Class II</b>	<b>Class III</b>	<b>Class IV</b>
Plan Review	NO	YES	YES	YES
Commissary or Warehouse	*	*	*	*
CFPM	NO	NO	YES	YES
Employee Health Policy	NO	NO	YES	YES
Assembly or preparation allowed	NO	NO	***YES (Limited)	YES
Cooking allowed	NO	NO	(Reheating ONLY)	YES
Barbecue operation allowed	NO	NO	NO	YES
Cold holding equipment	NO	**YES	**YES	**YES
Hot holding equipment	NO	**YES	**YES	**YES
Water supply required hot & cold	NO	NO	YES	YES
Waste water tank	NO	NO	YES	YES
Hand washing sink required	NO	NO	YES	YES
Dish washing sinks required	NO	NO	*YES	*YES
Adequate Ventilation	NO	NO	YES	YES
Examples	Pre-packaged non-potentially hazardous foods. Snacks, sodas, cookies, chips, crackers	Pre-packaged potentially hazardous foods. Ice cream, frozen meats, sandwiches	Pre-cooked foods with limited assembly. Hot dogs, shaved ice, coffee	No Menu Limitations

\* An additional licensed commissary or warehouse may be required based upon the Environmental Health Specialist's plan and menu review and pre-operational inspection.

\*\* Holding equipment is based on food type.

\*\*\*Limited food assembly. On site- menu and processes shall be provided at plan review and pre-operational inspection for approval.

## There is no size limit to mobile food units, but they must meet the following basic requirements:

1. A non-mobile unit, or structure, cannot be licensed as a mobile unit. The intention is to be mobile and not a permanent fixture. For example, a temporary food establishment set up using tables and tents cannot be licensed as a mobile unit.
2. All self-contained mobile units and pushcarts, Class III and IV, must have a hand washing sink equipped to provide water at a temperature of at least 38°C (100°F) through a mixing valve or combination faucet. Sinks must be stocked with hand washing soap and disposable towels or other approved means of hand drying.
3. A mobile food unit can serve at a temporary event lasting 3 or less days without the issuance of a separate permit.
4. Additional coolers (igloos) that are not attached to the unit may **ONLY** be used to store bottled drinks and ice.
5. Cleaning supplies and soiled utensils may be stored in additional tubs or containers that are non-absorbent, covered and stored in a manner as to prevent contamination or infestation.
6. A smooth and easily cleanable table may be assembled next to the unit **ONLY** for the purpose of serving condiments, napkins, and straws. This table must be visible from inside the mobile unit so it can be visually monitored.
7. Mobile units **must** be positioned to keep the general public away from the food preparation and cooking areas of the unit.
8. Mobile units **do not** include automobiles, trucks, or vans not designed for food preparation (this includes the trunk of your car). No food products may be stored in your vehicle such as extra supplies of breads, packaged hotdogs in a cooler, or prepared foods stored in insulated units. You may be required to return to your commissary several times a day.
9. Class IV Mobile Food Units may cook on a covered grill or smoker that is set up outside of the unit. *No other outside cooking equipment or food preparation is allowed.*

## Example of a Class III Push Cart

Food prepared on a push cart is limited to non-potentially hazardous foods or commissary-wrapped foods maintained at proper temperatures or precooked foods that require limited assembly, such as frankfurters.



The push cart is self-contained and readily movable. All equipment is attached to the unit.

Overhead protection is required to protect food from contamination.

Cold holding equipment shall be approved and easily cleanable. Cold holding may be mechanical or done by an approved method. Equipment must be capable of holding foods below 41° even on the hottest days or conditions. Additional cold holding equipment that is not attached to the unit is not allowed.

Equipment used to reheat and hot hold commercially processed or commissary prepared foods shall be approved and easily cleanable. Additional hot holding or reheating equipment that is not attached to the unit is not allowed.

Water tanks shall be large enough to supply fresh water for the duration of service times. Waste water tanks shall be 15% larger than fresh water tanks. A working water heater shall be installed. Water may be pressurized or gravity fed.

A separate hand washing sink shall be used for hand washing only. It shall have 100° water and be stocked with soap and disposable hand drying.

Each compartment in the 3 compartment sink needs to be large enough to submerge the biggest utensil that is used. If the pushcart is commissary based, a 3 compartment sink is not required as long as replacement utensils are available.

## **Push Cart Requirements (Class III)**

Menu is limited to non-potentially hazardous foods or commissary-wrapped foods maintained at proper temperatures or precooked foods that require limited assembly, such as frankfurters.

- The unit shall be self-contained. One piece. All equipment shall be enclosed within the unit or mounted to the unit. Unit shall be readily moveable (on wheels).
- No Cooking of raw animal foods is allowed
- A hand washing sink is required.
- Warewashing sinks (if required) shall meet code requirements for depth and fixtures. Each compartment in the 3 compartment sink needs to be large enough to submerge the biggest utensil that is used. If the pushcart is commissary based, a 3 compartment sink is not required as long as replacement utensils are available and washing utensils on the cart is not necessary.
- Water supply hot/cold shall be adequate for the operation. A general rule of thumb for a supply would be 2 gallons/employee for handwashing as defined in the temporary rules. A tank or an on demand system could be used for hot water.
- Water pressure hot/cold shall be adequate for the operation. Gravity fed systems may be approved on Pushcarts if they are able to provide adequate water pressure.
- Pushcarts are exempt from floors, walls, and ceilings requirements. Overhead protection is required by environmental factors. The food shall be protected
- If clean in place equipment is allowed then items to be cleaned shall be limited and process shall be demonstrated to be adequate.
- Cold holding (if required) shall be adequate. Non mechanical means of temperature control may be approved if the time products are held is limited, adequate temperatures are maintained, and the unit remains self-contained.
- Hot holding (if required) shall be done by mechanical means and must be adequate to maintain product temperatures for the duration of service. Grills, fryers, microwaves, etc. may be used to reheat commercially processed foods if 135\* can be achieved within 2 hours, or commissary prepared food if 165\* can be achieved within 2 hours.
- Pushcarts are exempt from restroom requirements.
- Pre-opening inspections shall include a menu and documentation of any limitations of the unit (refrigeration/cold holding, water supply, etc.).

# Example of a Class IV Self-Contained Mobile Food Truck or Trailer

Water tanks shall be large enough to supply fresh water for the duration of service times. Waste water tanks shall be 15% larger than fresh water tanks. A working water heater shall be installed. Water shall be pressurized.

Refrigeration must be mechanical and capable of maintaining food temperatures below 41° even on the hottest days or conditions.

Each compartment in the 3 compartment sink needs to be large enough to submerge the biggest pot or utensil that is used.

Hand washing sink is for hand washing only. The sink should be stocked with soap and disposable hand drying.

Serving windows and doors shall be equipped with tight fitting screens, air curtains, or another (preapproved) adequate means to prevent the entry of pests while in operation.

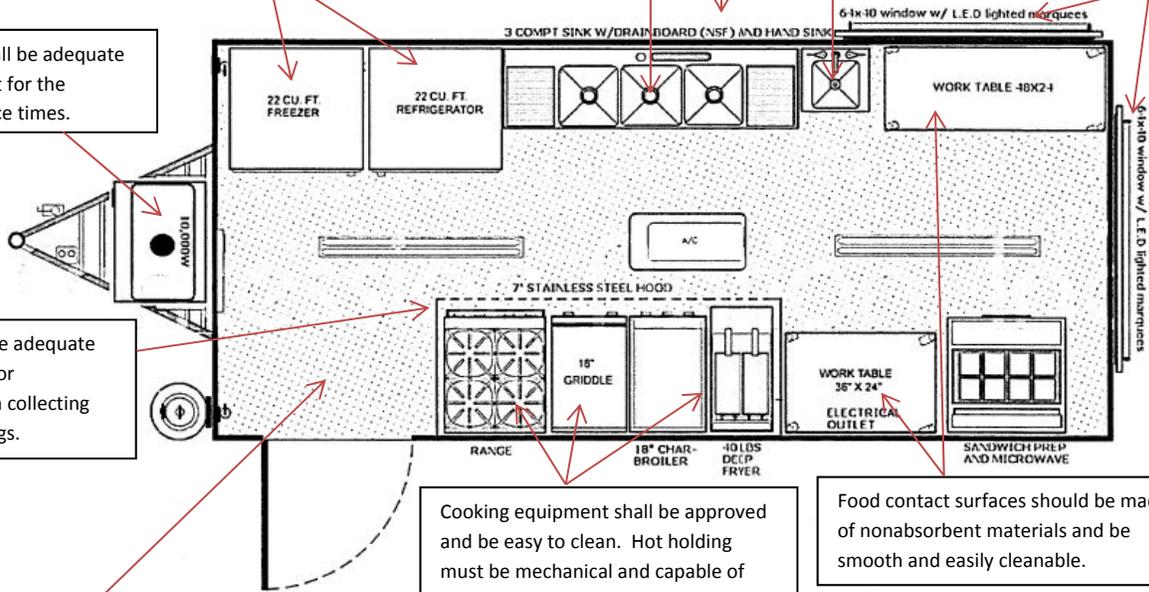
Power supply shall be adequate to power the unit for the duration of service times.

Ventilation must be adequate to prevent grease or condensation from collecting on walls and ceilings.

Wall, floor, and ceiling coverings shall be smooth and easily cleanable.

Cooking equipment shall be approved and be easy to clean. Hot holding must be mechanical and capable of maintaining food temperatures above 135\* - even on the coldest days or conditions.

Food contact surfaces should be made of nonabsorbent materials and be smooth and easily cleanable.



## Mobile Food Units (Class IV)

- Physical Facilities for mobile units shall meet Food Code requirements for floors, walls, and ceilings. This includes protection of outer openings.
- Unit must be self-contained aside from a grill or smoker. All equipment including dry, freezer, and refrigerated storage shall be on one unit.
- Refrigeration (if required) shall be mechanical. Refrigeration units shall be provided to keep potentially hazardous food (Time/Temperature Control for Food Safety) at 41°F or below and shall be equipped with thermometers to monitor holding temperatures.
- Hot holding (if required) shall be done by mechanical means. Hot food storage units shall be used to keep potentially hazardous food (Time/Temperature Control for Food Safety) at 135°F or above.
- All food, equipment and supplies must be stored on the unit and at least 6 inches off the ground and must have overhead protection such as a truck ceiling, umbrella, canopy, awning, etc. Self-service condiments must be on display in covered containers, squeeze bottles, or packets to protect against contamination.
- A designated hand washing sink equipped to provide water of at least 100° shall be provided.
- A pressurized water supply (hot/cold) and water tanks shall be adequate for operation. There should be enough water to fill each compartment of the three-compartment sink and enough water for each employee to wash hands as needed throughout the day- a general rule is 2 gallons/person for handwashing.
- Units that handle unpackaged food shall have a three-compartment warewashing sink or have daily access to a three-compartment sink located in the owner's licensed commissary, where utensils can be adequately washed and sanitized. Three compartment sinks shall meet code requirements for depth and fixtures as well as have water of at least 110° and drainboards that are sloped to drain. Sink compartments shall be large enough to accommodate immersion of the largest piece of equipment or utensil.
- Restrooms: In the case of a temporary event, the mass gathering criteria (IAC Chapter 19) can apply which would allow the use of port-a-potties. In the event of a mobile unit setting up at a fixed location, a plumbed restroom shall be required. A written agreement with a neighboring business is required.
- A home base of operation needs to be adequate and free of gross insanitary conditions.
- A plan review and pre-operational inspection, including menu review, shall occur prior to a license approval.

## Water Supply and Sewage

An adequate supply of clean water (potable) shall be provided from an approved source.

**1) Water Supply Tanks** - Standards for water supply tanks are as follows:

- a) The materials that are used in the construction of a mobile food unit water tank and accessories shall be safe, durable, corrosion resistant, nonabsorbent, and finished to have a smooth and easily cleanable surface.
- b) The water supply tank shall be sloped to drain at a discharge outlet that allows complete drainage of the tank.
- c) An access port for inspection and cleaning shall open at the top of the tank, flanged upward at least one-half inch and equipped with a secure port cover, which is sloped to drain.
- d) A fitting with V-type threads is allowed only when the hose is permanently attached.
- e) If provided, a water tank vent shall end in a downward direction and be covered with 16 mesh when the vent is not exposed to dust or debris or with a protective filter when the vent is exposed to dust or debris.
- f) The tank and its inlet and outlet shall be sloped to drain. The inlet shall be designed so that it is protected from waste discharge, dust, oil or grease.
- g) Hoses used to fill potable water tanks should be dedicated for that one task and should be identified for that use to prevent contaminating the water. The hoses are usually clear, white with a blue stripe, or labeled by the manufacturer as “food grade”.
- h) A filter that does not pass oil or oil vapors shall be installed in the air supply line between the compressor and the drinking water system.
- i) The water inlet, outlet or hose shall be equipped with a cap and keeper chain or other adequate protective device. This device must be attached when the system is not in use.
- j) The water tank, pump and hoses shall be flushed and sanitized before being placed into service after construction, repair, modification or periods of nonuse.
- k) Water supply systems shall be protected against backflow or contamination of the water supply. Backflow prevention devices, if required, shall be maintained and adequate for their intended purpose.
- l) The water supply tank, pump and hoses shall be used to convey drinking water and shall be used for no other purpose.

**2) Wastewater Disposal.** The sewage holding tank shall be 15 percent larger in volume than the water supply tank and shall be sloped to drain. The drain hose (1inch) shall be larger than the supply hose (3/4 inch). Liquid waste shall be removed at an approved servicing area. The liquid waste retention tank shall be thoroughly flushed and drained during the servicing operation. Wastewater shall be disposed of in an approved wastewater disposal system sized, constructed, maintained and operated according to law.

## **5-3 MOBILE WATER TANK AND MOBILE FOOD ESTABLISHMENT WATER TANK**

### **MATERIALS**

#### **5-301.11 *Approved.***

Materials that are used in the construction of a mobile water tank, mobile food establishment water tank and appurtenances shall be:

- (A) Safe;
- (B) Durable, corrosion resistant and nonabsorbent; and
- (C) Finished to have a smooth, easily cleanable surface.

### **DESIGN AND CONSTRUCTION**

#### **5-302.11 *Enclosed System, Sloped to Drain.***

A mobile water tank shall be:

- (A) Enclosed from the filling inlet to the discharge outlet; and
- (B) Sloped to an outlet that allows complete drainage of the tank.

#### **5-302.12 *Inspection and Cleaning Port, Protected and Secured.***

If a water tank is designed with an access port for inspection and cleaning, the opening shall be in the top of the tank and:

- (A) Flanged upward at least 13 mm (one-half inch); and
- (B) Equipped with a port cover assembly that is:
  - (1) Provided with a gasket and a device for securing the cover in place, and
  - (2) Flanged to overlap the opening and sloped to drain.

#### **5-302.13 *“V” Type Threads, Use Limitation.***

A fitting with “V” type threads on a water tank inlet or outlet shall be allowed only when a hose is permanently attached.

#### **503.14 *Tank Vent, Protected.***

If provided, a water tank vent shall terminate in a downward direction and shall be covered with:

- (A) 16 mesh to 25.4 mm (16 mesh to 1 inch) screen or equivalent when the vent is in a protected area; or
- (B) A protective filter when the vent is in an area that is not protected from windblown dirt and debris.

#### **5-302.15 *Inlet and Outlet, Sloped to Drain.***

- (A) A water tank and its inlet and outlet shall be sloped to drain.

- (B) A water tank inlet shall be positioned so that it is protected from contaminants such as waste discharge, road dust, oil or grease.

**5-302.16 *Hose, Construction and Identification.***

A hose used for conveying drinking water from a water tank shall be:

- (A) Safe;
- (B) Durable, corrosion-resistant and nonabsorbent;
- (C) Resistant to pitting, chipping, crazing, scratching, scoring, distortion and decomposition;
- (D) Finished with a smooth interior surface; and
- (E) Clearly and durably identified as to its use if not permanently attached.

**NUMBERS AND CAPACITIES**

**5-303.11 *Filter, Compressed Air.***

A filter that does not pass oil or oil vapor shall be installed in the air supply line between the compressor and drinking water system when compressed air is used to pressurize the water tank system.

**5-303.12 *Protective Cover or Device.***

A cap and keeper chain, closed cabinet, closed storage tube or other approved protective cover or device shall be provided for a water inlet, outlet and hose.

**5-303.13 *Mobile Food Establishment Tank Inlet***

A mobile food establishment's water tank inlet shall be:

- (A) 19.1 mm (three-fourths inch) in inner diameter or less; and
- (B) Provided with a hose connection of a size or type that will prevent its use for any other service.

**OPERATION AND MAINTENANCE**

**5-304.11 *System Flushing and Sanitation.***

A water tank, pump and hoses shall be flushed and sanitized before being placed in service after construction, repair, modification and periods of nonuse.

**5-304.12 *Using a Pump and Hoses, Backflow Prevention***

A person shall operate a water tank, pump and hoses so that backflow and other contamination of the water supply are prevented.

**5-304.13 *Protecting Inlet, Outlet and Hose Fitting.***

If not in use, a water tank and hose inlet and outlet fitting shall be protected using a cover or device as specified under § 5-303.12.

**5-304.14.1 Tank, Pump and Hoses, Dedication.**

- (A) Except as specified in ¶ (B) of this section, a water tank, pump and hoses used for conveying drinking water shall be used for no other purpose.
- (B) Water tanks, pumps and hoses approved for liquid foods may be used for conveying drinking water if they are cleaned and sanitized before they are used to convey water.

**Chart 4-D FDA Food Code Mobile Food Establishment Matrix**

This table is a plan review and inspectional guide for mobile food establishments based on the mobile unit's menu and operation. Mobile units range in type from push carts to food preparation catering vehicles.

To use the table, read down the columns based on the menu and operation in use. For example, if only prepackaged potentially hazardous food (time/temperature control for safety food) is served, then requirements listed in the Potentially Hazardous (TCS food) Menu - *Prepackaged* column apply. Likewise, if only food that is not potentially hazardous (time/temperature control for safety food) is prepared on board, then requirements listed in the Not Potentially Hazardous Menu (TCS) - *Food Preparation* column apply. Note that if a mobile food establishment has available for sale to the consumer both prepackaged potentially hazardous food (time/temperature control for safety food) and potentially hazardous food (time/temperature control for safety food) prepared on board, then the more stringent requirements of the Potentially Hazardous (TCS) Menu- *Food Preparation* column apply.

It is important to remember that mobile units may also be subject to all Food Code provisions that apply to food establishments. Consult the local regulatory authority for specific local requirements.

The local regulatory authority's decision to require auxiliary support services such as a commissary or servicing area should be based on the menu, type of operation, and availability of on-board or on-site equipment.

NOTE: The Food Code definition of "Food Establishment" does not include an establishment that offers only prepackaged foods that are not potentially hazardous (time/temperature control for safety foods). Example: Class I Units

**FDA FOOD CODE MOBILE FOOD ESTABLISHMENT MATRIX**

<i>Food Code</i>	<i>Potentially Hazardous Food (TCS food) Menu</i>		<i>Not Potentially Hazardous Food (TCS Food) Menu</i>
<i>Areas/Chapter</i>	<i>Food Preparation</i>	<i>Prepackaged</i>	<i>Food Preparation</i>
Personnel	Applicable Sections of Parts 2-2 - 2-4	Applicable Sections of Parts 2-2 - 2-4	Applicable Sections of Parts 2-2 - 2-4
Food	3-101.11 3-201.11-.16 3-202.16; Applicable Sections of Part 3-3; 3-501.16 3-501.18(A)	3-101.11 3-201.11-.16 3-303.12(A) 3-501.16 3-305.11; 3-305.12 (Applicable to Service Area or Commissary)	3-101.11; 3-201.11 3-202.16; Applicable Sections of Part 3-3
Temperature Requirements	3-202.11; Applicable Sections of Parts 3-4 & 3-5	3-202.11 3-501.16	NONE
Equipment Requirements	Applicable Sections of Parts 4-1 - 4-9 and 5-5	Applicable Sections of Parts 4-1 - 4-2; 4-6 and 5-5	Applicable Sections of Parts 4-1 - 4-2; 4-5 - 4-6 and 5-5
Water & Sewage	5-104.12 5-203.11(A) & (C) Part 5-3; 5-401.11 5-402.13-.15	5-104.12 5-203.11(A) & (C) Part 5-3; 5-401.11 5-402.13-.15	5-104.12 5-203.11(A) & (C) Part 5-3; 5-401.11 5-402.13-.15
Physical Facility	6-101.11; 6-201.11 6-102.11(A) & (B) 6-202.15; 6-501.11 6-501.12; 6-501.111	6-101.11 6-102.11(A) & (B) 6-202.15 6-501.111	6-101.11; 6-201.11 6-102.11(A) & (B) 6-202.15; 6-501.11 6-501.12; 6-501.111
Toxic Materials	Applicable Sections of Chapter 7	Applicable Sections of Chapter 7	Applicable Sections of Chapter 7
Servicing	6-202.18/ As necessary to comply with the Food Code	6-202.18/ As necessary to comply with the Food Code	6-202.18 / As necessary to comply with the Food Code
Compliance and Enforcement	Applicable Sections of Chapter 8 and Annex 1	Applicable Sections of Chapter 8 and Annex 1	Applicable Sections of Chapter 8 and Annex 1

# **Mobile Food Establishments**

## **Q&A**

**Q: What foods can be prepared with a Mobile Food Unit License?**

A: A Class I Mobile Food Unit is exempt from licensing. A Class II Mobile Food Unit may not cook, prepare, or handle unpackaged food. These units are licensed to sell only prepackaged foods that come from an approved source. A Class III Mobile Food Unit is limited to pre-cooked foods or pre-package foods from an approved source. No cooking of any foods is allowed in a Class III Mobile Unit. A Class IV Mobile Food Unit may prepare any food that is capable of being produced in the mobile unit or its licensed commissary.

**Q: Do menus need to be approved and do menu changes need to be submitted for approval?**

A: All menus will be reviewed for approval during a pre-open inspection. Class I Units are not required to submit a menu for approval. Class II Units are required to submit menu changes if the type of food for sale changes. Class III Units are required to submit all menu item changes due to the limitations of their units. Class IV Units are required to submit menu changes only if the changes require equipment changes.

**Q: Can food that is prepared or stored in my home be used or sold in my licensed mobile food unit?**

A: No, all ingredients and foods must come from, be prepped, or be stored in, a licensed and approved facility except for whole uncut fruits and vegetables and honey.

**Q: What type of facility is required to obtain a Mobile Food Establishment License?**

A: An easily movable fully enclosed truck, pull behind enclosed trailer, or a pushcart can be licensed as a mobile unit as long as the facility meets all requirements.

**Q: Can I obtain a mobile food establishment license for my mobile tent and table set up?**

A: No- A tent and table set up is not a permanent structure and cannot be licensed as a mobile food establishment. A table and tent set up may apply for a Temporary Food Establishment license if it is operating in conjunction with an event.

**Q: I live in a rural area. Can I fill my mobile unit water tanks from my private well?**

A: Hot and cold water under pressure must be provided from a public water system or private well that is tested annually for nitrates and coliform and must meet Iowa drinking water standards. Records of water tests must be maintained in the mobile unit and made available to the regulatory authority.

**Q: Can I use the same water from my home (that I use to fill my water tanks) to make ice to use in my mobile unit?**

A: Ice may be made inside the licensed mobile unit (using the water from the water tanks) or purchased from an approved source. Ice may not be made inside a home kitchen and used by the licensed mobile unit.

**Q: Can I use my home kitchen as my commissary or home base of operation?**

A: Your home kitchen cannot be licensed as a food preparation commissary because it does not meet the requirements of a food establishment. Your home address may be used as your home base of operation for cleaning, servicing, and storage of your mobile unit.

**Q: What are the health and hygiene requirements for a Mobile Food Establishment?**

A: A Certified Food Protection Manager must work in the mobile unit. There must be a verifiable employee health policy in place for all employees. The mobile establishment is required to have procedures for employees to follow when responding to vomiting or diarrheal events that involve the discharge of vomitus or fecal matter onto surfaces in the food establishment. Food handlers must be free of contagious or communicable diseases, sores or infected wounds. Hair restraints must be worn. Food handlers must keep themselves clean and wear clean outer clothing. Smoking is not permitted while handling or preparing food. Hands must be washed as frequently as necessary to maintain good sanitation.

**Q: Do I need a restroom in my mobile unit?**

A: If a mobile unit is operating at a temporary event, the mass gathering criteria (IAC Chapter 19) can apply which would allow the use of port-a-potties. If the mobile unit is operating at a fixed location, a plumbed restroom is required. A restroom *inside* the mobile unit is not required. An agreement with a neighboring business would be acceptable. Pushcarts are exempt from restroom requirements.

**Q: Can I use my licensed Mobile Food Unit as a commissary kitchen for my catering operation?**

A: Mobile Food Units are somewhat restricted in their operations due to equipment and space limitations. Contact your local regulatory authority with any changes in your business that was not approved during the plan review and pre-operational inspection.

**Q: Can I operate my Mobile Food Unit in a state other than Iowa?**

A: The Mobile Food Unit license is issued for operation in the State of Iowa. Contact the Regulatory Authority in the state you wish to operate if you have further questions.

**Q: How is a Mobile Food Unit License obtained?**

A: A completed application with appropriate fee must be received by the food inspection agency covering your geographic region at least 30 days prior to the intended opening date. Once the application is processed your unit and commissary (if applicable) must be inspected and approved to operate before production begins.

# CHAPTER 2: Administrative Requirements

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## Licensing Your Mobile Food Unit- Class II, III, & IV

A license is required for all Class II, III, and IV units. Before a Mobile Food Establishment is licensed, it must go through a plan review and pre-operational inspection. Contact your local Regulatory Authority early in your planning process. Determine the county where your home base of operation will be located and contact that county's Environmental Health Program.

<http://dia.iowa.gov/page27.html>

Prior to licensing, there may be other local agencies from which you will be required to obtain approvals. These include, but are not limited to planning (zoning), building codes (structural, electric, plumbing), Fire Marshall, and other city or county authorities.

Licenses are valid for one year and must be posted in public view during all hours of operation along with the most recent inspection report. Mobile unit licenses are non-transferable.

## Certified Food Protection Manager (CFPM)-Class III&IV

A Certified Food Protection Manager is required for all Class III and IV Mobile Units.

As of January 1, 2014, Iowa requires that there be at least one Person in Charge in each food establishment who has completed a Certified Food Protection Manager course and shows food safety proficiency by passing a test that is part of an accredited program.

*Class I and II Mobile units are not required to have a CFPM.*

## Person-In-Charge (PIC)- Class II, III, & IV

Someone in the mobile unit must be in charge during all hours of operation. This person is responsible for knowing the food sanitation rules and the procedures within your unit. This person needs to be able to provide employees with information they need to perform their job. The Person-In-Charge (PIC) must inform employees to notify the PIC when the employee is experiencing fever, sore throat, or gastrointestinal symptoms such as vomiting, diarrhea, and nausea. The PIC must have the authority to send an employee home (Sections 2-101.11; 2-201.12). The PIC must also be able to describe the major food allergens and the symptoms that they could cause if a customer had an allergic reaction.

All employees shall be under the direction of the person in charge. The person in charge is required to demonstrate knowledge of rules applicable to the food service operation. The person in charge shall ensure that workers are effectively cleaning their hands, that potentially hazardous food is adequately cooked, held or cooled, and that all multiuse equipment or utensils are adequately washed, rinsed and sanitized.

Demonstration of knowledge can be met by having no violations of Risk Factor Priority Items during the current inspection, being a CFPM, or by correctly answering the inspector's food safety questions.

## **Employee Health Policy- Class III & IV**

All food establishments and Mobile Food Units are required to have a verifiable employee health policy. Employees that are ill with diarrhea, fever, vomiting, jaundice, sore throat with fever, or discharges from the eyes, nose or mouth may not work with exposed food, clean equipment, utensils, linens or unwrapped single service items.

## **Clean-up of Vomiting and Diarrheal Events- Class III & IV**

A food establishment shall have procedures for employees to follow when responding to vomiting or diarrheal events that involve the discharge of vomitus or fecal matter onto surfaces in the food establishment. The procedures shall address the specific actions employees must take to minimize the spread of contamination.

# Chapter 3: Personal Hygiene Requirements

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## Employee Hygiene

- Hand-washing is very important when working with food and drinks. Twenty (20) seconds of proper hand washing removes microorganisms that are known to cause illness.
- Hand sinks must have running water of at least 38° (100°F), dispensed soap, disposable hand drying, a hand washing sign, and wastebasket. Class III and IV mobile unit must be plumbed to provide hot and cold running water at hand sinks.
- No jewelry on the arms or hands should be worn with the exception of a plain wedding band.
- Employees shall have clean garments, aprons and effective hair restraints.
- Cuts must be kept covered with an impermeable clean cover such as a finger cot or bandage and a single-use glove over the impermeable cover.
- Smoking, eating or drinking in the mobile food unit/pushcart is not allowed
- An employee may drink from a closed beverage container if the container is handled to prevent contamination of the employee's hands, the beverage container, and exposed food, equipment, utensils, and single service/use articles. Example: a drink with a lid and a straw.
- All unauthorized persons are to be kept out of the mobile food unit/pushcart.



## Handling of Ready-To-Eat Foods

Employees may not handle ready to eat food with their bare hands. In place of hands, use suitable utensils such as deli tissue, spatulas, tongs, single-use-gloves, or dispensing equipment.

\*Single used gloves shall be used for only one task such as working with ready-to-eat food or working with raw animal food, used for no other purpose, and discarded when damaged or soiled, or when interruptions occur during the operation. Hand washing shall occur prior to putting on new gloves.

# CHAPTER 4: Food Source and Temperatures

## Food Source

All food products must be wholesome and free of spoilage, microorganisms, toxic chemicals, and other harmful substances that can make people sick. All food must either be prepared in the unit or obtained from an approved source. All food supplies shall come from a commercial manufacturer or a source that complies with both state and federal laws. Home canned or home processed foods are not allowed and cannot be stored in the unit or served to the public. The use of food in hermetically sealed containers that is not prepared in an approved food processing plant is prohibited. The only alternative to preparing the food in the unit is to prepare the food in an approved licensed facility such as the owner's commissary. If you plan to prepare food off the unit, a separate commissary license is required.

## Potentially Hazardous Foods/Time Temperature Control for Safety

Potentially hazardous foods are:

- Food of an animal origin (raw or cooked)
- Cooked plant products
- Raw seed sprouts, cut melons, garlic and oil mixtures, cut leafy greens and tomatoes

Potentially Hazardous Foods require FATTOM in order to survive and multiply. Food borne illnesses can be prevented by removing one of these elements and monitoring time and temperature. FATTOM stands for:



- F - food (nutrients)
- A - acidity (pH >= 4.6)
- T - time (10-20 minutes)
- T - temperature (food in TDZ, 4 hour rule)
- O - oxygen (aerobic, anaerobic, facultative)
- M - moisture (Aw >= .85)

The following foods are identified by the FDA Model Food Code as potentially hazardous foods (PHF)		
Milk and Milk Products	Shell eggs-except those heat treated to eliminate salmonella app.	Meats-Beef, Pork, and Lamb
Poultry	Fish	Shellfish and Crustacea
Tofu	Garlic in oil Mixtures	Sliced Melon
Baked or Boiled Potatoes	Raw Sprouts and Seeds	Soy-Protein Foods
Cooked Rice and Cooked Beans	Sliced Tomatoes or Cut Leafy Greens	Other Heat-Treated Plant Foods

# Chapter 5: Cleaning and Sanitizing Requirements

## Dishwashing

A three compartment sink with drain boards is required for Class III and IV mobile food units.

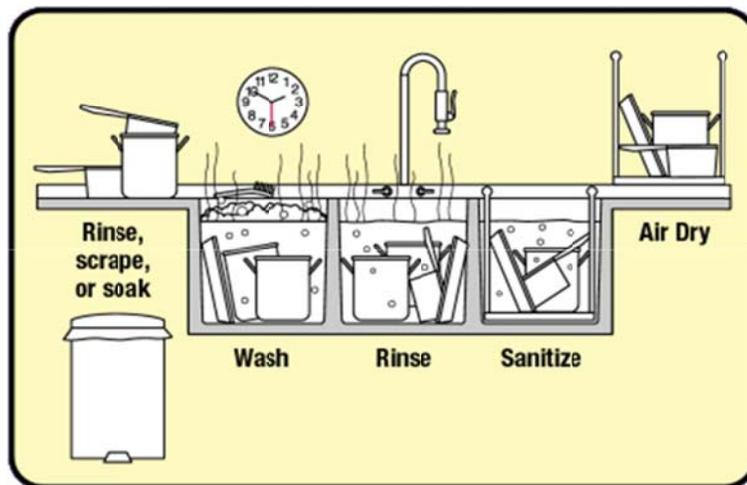
All food contact surfaces shall be washed, rinsed, and sanitized at least every four (4) hours.



The approved chemical sanitizers are Chlorine, Quaternary Ammonium Compounds (Quat), and Iodine. Surfaces may be sanitized using a clean wiping cloth stored in a sanitizing solution bucket or a spray bottle of sanitizer (as long as it is used with a disposable towel or the towel is stored in sanitizer solution between uses.)

Use test strips that are made for the sanitizer that you are using. The test strips will ensure that the sanitizer has been mixed according to the manufacturer's directions.

Do not use sponges to clean a food contact surface.



## Toxic Materials

- Only those toxic items necessary for the operation of the mobile food unit/pushcart shall be maintained or used.
- Toxic materials and poisonous materials shall bear the manufacturer's label. Working containers of toxic items shall be identified with the common name of the material.
- Toxic materials and poisons shall be adequately separated from food, equipment, utensils, linens, and single-service and single-use items.
- Only those toxic materials or poisons permitted by law in food establishments shall be used. These materials shall be used according to the manufacturer's use instructions.

# Chapter 6: General Food Protection

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- Store food and utensils at least six inches off the ground/floor.
- Store food only in food grade containers.
- Keep ready-to-eat foods away from raw food products.
- All mobile food units must have overhead protection (truck roof, umbrella, canvas, canopy)
- Store chemicals such as detergents and sanitizers below and separate from the food and utensils.
- Properly label all chemical containers.
- Keep all garbage in a water tight container with lid.
- Protect food, equipment, and outer openings from insects, rodents, and other environmental contamination.
- The food products storage and preparation areas of the mobile unit must be protected from public access.
- Condiments shall be dispensed in individual packets, squeeze bottles, or served by the employee.



## **Food Protection**

All food shall be covered and stored off the floor. During operation, food shall not be displayed or stored in or served from any place other than the licensed mobile food unit/pushcart. Condiments such as ketchup, mustard, coffee creamer and sugar shall be served in individual packets or from squeeze containers or pump bottles. Milk shall be dispensed from the original container or from an approved dispenser. Ice used as a food ingredient or a cooling medium shall be made of drinking water and be obtained from an approved source. Fruits and vegetables must be washed before used or sold. All food shall be protected from customer handling, coughing or sneezing by wrapping, sneeze guards or other effective means. All cooking and serving areas shall be adequately protected from contamination.

## **Lighting**

Adequate lighting shall be provided. Lights above exposed food preparation areas shall be shielded.

## **Garbage Containers**

An adequate number of cleanable garbage containers with covers shall be provided.

## **Thawing Foods**

Foods may be thawed under refrigeration, under cool running water, as part of the cooking process, or in a microwave if it will be cooked immediately.

## **Date Marking**

Date mark all ready-to-eat potentially hazardous foods that will be kept longer than 24 hours at 41°F or lower with a date of preparation or expiration. Date marks shall not exceed 7 days, including the preparation day. Discard foods held longer than 7 days.

## **Consumer Advisory**

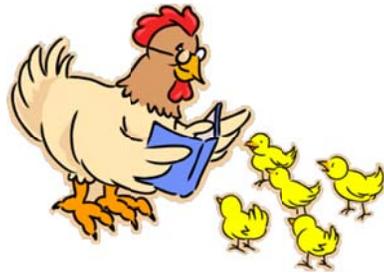
If raw or undercooked animal food such as beef, eggs, fish, lamb, poultry or shellfish is offered in ready-to-eat form, the license holder (or person in charge) shall post the following language as a reminder to consumers:

*“Thoroughly cooking foods of animal origin such as beef, eggs, fish, lamb, pork, poultry, or shellfish reduces the risk of food are consumed raw or undercooked. Consult your physician or public health official for further information.”*

Identification of the animal-derived foods shall be disclosed by asterisking them to a footnote on the menu that states that the items are served raw or undercooked, or contain (or may contain) raw or undercooked ingredients.

# Cooking

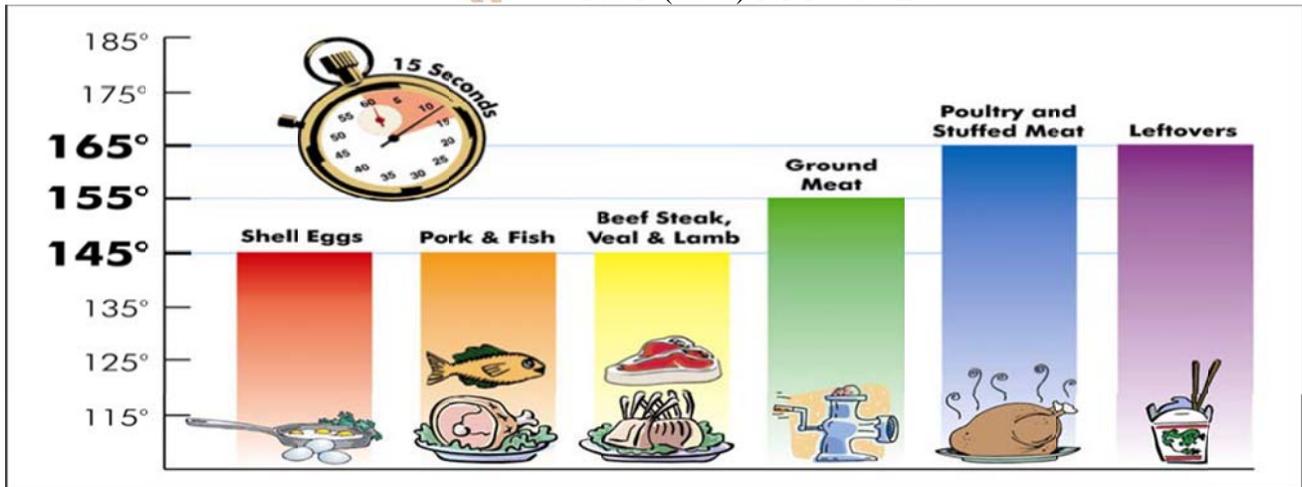
Cook raw animal products to the following internal temperatures:



Poultry, stuffed meats, stuffed fish, stuffed pasta 165° (74°) for 15 seconds

Ground beef and other ground meats 155°F (68°C) for 15 seconds

Beef steak, veal, lamb, pork, fish, shell eggs 145°F (63°C) for 15 seconds



# Hot and Cold Holding

Potentially hazardous foods must be kept cold at 41°F or colder or kept hot at 135°F or hotter. Temperatures between 41°F and 135°F allow for the rapid growth of bacteria that can make people sick.

**Always Remember**

**Keep Hot Foods Hot!**  
Maintain hot foods at a temperature of 135° F or hotter

**Keep Cold Foods Cold!**  
Maintain cold foods at a temperature of 41° F or colder

Section 3-501.16, 2005 Food Code

For Additional Information Contact  
Your Local Health Department

Two vertical thermometers are shown. The left one has a red liquid level at 135°F and is labeled 'Hot'. The right one has a blue liquid level at 41°F and is labeled 'Cold'.

## Cooling

The best way to keep food safe is to make it fresh each day before you serve it. If you have food that has been held hot and is left over or cooked in advance, you must cool it from 135\* to 70\* within the first 2 hours. Food must then be cooled from 70\* to 41\* or below within the next 4 hours, for a total of 6 hours. If the food does not reach 70\* within the first 2 hours it must be reheated to 165\* (within 2 hours) and the cooling process may start again. If the food takes longer than two hours to reheat to 165°F or takes longer than four hours to drop from 70°F to 41°F it must be disposed of.

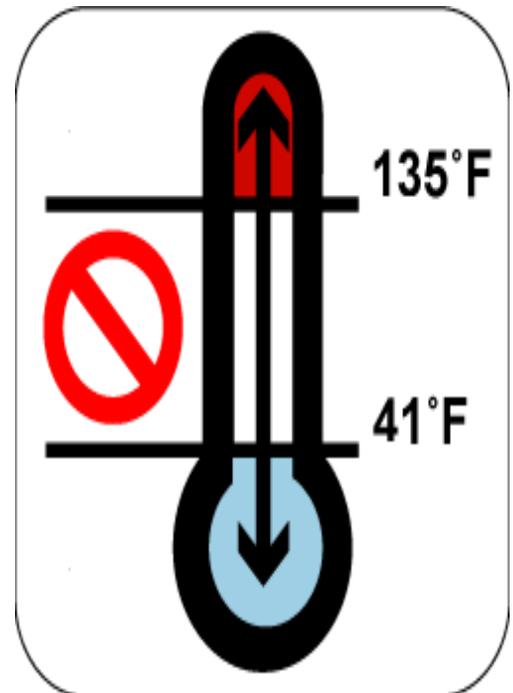
### Acceptable method of cooling food:

Cool hot cooked food from:

- 135<sup>o</sup>F to 70<sup>o</sup>F within two hours, and then 41<sup>o</sup>F or lower within in an additional four hours for a total cooling time of up to six hours.

### Methods of cooling:

- Reduce the quantity of the food you are cooling – fill pans no deeper than two-inches.
- Stir foods to cool them faster and more evenly.
- Use ice wands and ice-water baths.
- Add ice or cool water as an ingredient.
- Loosely cover, or leave uncovered if protected from overhead contamination.
- Use metal pans rather than plastic, when possible.
- Use a steam jacket kettle as a cooler.
- Use blast chillers before placing food into refrigerated storage



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## Reheating

All potentially hazardous foods that have been cooked, and cooled must be reheated to at least 165°F within two hours before being placed in hot holding. Commercial made products (precooked and canned items) reheated for hot holding must be reheated to at least 135°.

## Ventilation

Ventilation hood systems and devices shall be sufficient in number and capacity to prevent grease or condensation from collecting on walls and ceilings.

**The State Fire Marshal Division has implemented the following policy regarding ventilation in Mobile Units:**

 <p>Division Order Bureau Order Special Order</p> <p>Order No.: <b>SFM 15-03</b></p> <p>-----  <input checked="" type="checkbox"/> Procedure  <input type="checkbox"/> Plan  <input type="checkbox"/> Rule</p>	<b>Iowa Department of Public Safety State Fire Marshal Division</b>	
	<b>TITLE/SUBJECT: Mobile Food Vendor Enforcement</b>	<b>IDENTIFIER: 46-03.11</b>
	<b>TO: SFM Fire Inspectors &amp; Building Code Construction Design Engineers</b>	<b>CC: SFM Supervisors</b>
	<b>RELATED DIRECTIVES/FORMS:</b>	
	<b>APPLICABLE CALEA STANDARD(S):</b>	
	<b>EFFECTIVE DATE: February 1, 2015</b>	<b>REVISION #: New</b>
	<b>INSTRUCTIONS:</b>	
	<b>APPROVED BY:</b>  <b>James J. Saunders, Director</b>	<b>DATE:</b>  <b>February 1, 2015</b>

### I. Purpose

The purpose of this policy is to give all State Fire Marshal Division Construction Design Engineers and Fire Inspectors guidance on enforcement of new and existing mobile food vendors.

### II. Policy

It is the policy of this Division to regulate fire safety for all mobile vendors in the State of Iowa. This policy outlines a minimum standard of what is required for mobile food vendors and their operations. Local jurisdictions have the authority to be more restrictive in enforcement.

### III. Definitions

- A. *UL 300 System* - extinguishing units for commercial cook top stoves.
- B. *New Mobile Food Vendor* - any vendor starting their service after February 1, 2015.
- C. *Existing Mobile Food Vendor* - any vendor already in service before February 1, 2015.

### IV. Procedure

- A. New mobile food vendors who will be commercial cooking, creating grease laden vapors and smoke shall have at a minimum a Type I hood with suppression in compliance with UL 300 or another nationally recognized code or standard. A K rated extinguisher for the commercial cooking operation and an ABC extinguisher for other hazards shall be provided in accordance with National Fire Protection Association (NFPA) 10, *Standard for Portable Fire Extinguishers*. The ABC extinguisher at a minimum shall be a 2A:10BC.
- B. Existing mobile food vendors who do not perform commercial cooking with grease laden vapors and smoke, shall have an ABC rated extinguisher in compliance with National Fire Protection Association (NFPA) 10, *Standard for Portable Fire Extinguishers*. The ABC

extinguisher at a minimum shall be a 2A:10BC.

- C. Existing mobile food vendors who do not utilize deep fryers but still fry food, shall have at a minimum a Class K extinguisher for cooking operations and an ABC extinguisher in compliance with National Fire Protection Association (NFPA 10) for other hazards. The ABC extinguisher at a minimum shall be a 2A:10BC.
- D. All mobile food vendors shall have extinguishers that have a current inspection tag. These tags shall be from an extinguisher maintenance company. The State Fire Marshal Division realizes that some cities require their city tags to be used. If a city that requires the local tag is a city in which the vendor is operating, the vendor shall comply with this requirement.
- E. All mobile food vendors utilizing deep fat fryers or open flame cooking shall be located 20 feet from any business unless an exemption is granted from the Authority Having Jurisdiction (AHJ).
- F. Compressed gas cylinders and piping systems shall be installed, secured, and inspected in compliance with NFPA 54 or other nationally recognized standard.