

DRAFT

**Greetings.** Thank you for reviewing this draft document. The Washington State Retail [Food Safety Advisory Council](#) (FSAC) is drafting guidance for implementing mobile food unit requirements to help encourage consistent standards for mobile food units across the state. It is a compilation of current practices, input from stakeholders, and review of guidelines and state food safety codes in the United States.

Contents

**About this document** ..... 2

**Glossary**..... 3

**Physical Facility and Capacity** ..... 5

    Handwashing Facilities ..... 5

    Refrigeration Requirements ..... 5

    Hot Holding Capacity ..... 5

    Fresh Water Capacity and Maintenance ..... 6

    Power Capacity ..... 7

    Floors, Walls, and Ceilings ..... 8

**Advanced Food Preparation Processes, Risks, and Controls**..... 9

    Cooling..... 9

    Produce Washing..... 9

    Using additional equipment ..... 10

    Raw meat handling..... 10

    Deep fat Frying ..... 10

    Advance Preparation ..... 11

**Cleaning and Sanitizing**..... 11

    Dishwashing..... 11

    Hood filters and other pieces of equipment ..... 11

    Floors, non-food contact surfaces, and exterior of mobile ..... 11

**Support Units** ..... 11

    Commissary ..... 11

    Commissary Capacity..... 12

    Servicing Area ..... 12

    Restroom Availability..... 13

    Mobile Name and Route Posting..... 13

**Self-Contained or Commissary Exempt Mobiles** ..... 13

**Mobile Food Unit Plan Review Materials** ..... 15

**Plan Review Reciprocity.** ..... 15

    Application of RCW 43.20.120..... 15

    Last Inspection Report..... 15

**Mobile Food Unit Equipment Requirements** ..... 18

## About this document

The *Mobile Operating Guide* represents a collaborative effort of retail food safety partners and the members of the Washington State Retail Food Safety Advisory Council. This guidance was prepared with input from industry and regulators in response to changing retail food practices in the state and changing state laws. It is designed to assist local regulatory officials and mobile food operators address the approval and operating requirements to help ensure safer food and increase consistency across the state.

These guidelines were designed with oversight by the Washington Retail Food Safety Advisory Council to help ensure a broad spectrum of stakeholders. Participants that provided comment or reviewed the material will be included at the end of this document. The guidelines are encouraged for use in Washington and incorporate state rule requirements as well as best practice from around the United States. While this document includes specific information about the rules for the construction and operation of mobiles, it does not contain all requirements in Chapter 246-215 Washington Administrative Code. Operators must have plans and specifications for the construction or alteration of mobile food units approved by the local regulatory authority.

## Planning for Success

Plan Review is designed to optimize the functionality of a food establishment while ensuring an efficient flow of food and a safe experience for the consumer. It will help management and staff better understand and comply with industry desires and regulatory requirements. A thorough Plan Review will justify the location, type and utility of equipment, outline traffic patterns in the production and service areas and review the diagramming specifications for electrical, mechanical and plumbing systems. Yes, a Plan Review seeks code compliance, but more importantly, it realistically helps ensure the public health and safety of a facility without undue financial burdens.

The approach is one of objectivity where menu items are qualified and quantified to determine the facility layout and operating systems.

## Glossary

### Commissary

Commissary means an approved food establishment where food is stored, prepared, portioned or packaged for service elsewhere.

**Floor Plan:** A detailed drawing to scale of the layout of the mobile food unit including identification and location of the following:

- Equipment (stove, steamtable, refrigeration)
- Power sources (generator, LP gas containers, batteries)
- Water (fresh and gray water tanks, plumbing fixtures, sinks)
- Doors, windows
- Counters, storage
- Other features available for the food establishment

### L&I

New or altered mobile food units, also called conversion vendor units, undergo plan review by Labor and Industries ("L&I") for structural, fire, and other health and safety concerns ([RCW 43.22.340](#)). L&I approval is required by RCW prior to operation as a mobile food truck in the state, regardless if the mobile is operated on a temporary or permanent (annual) basis.

Vehicles meeting each of the following conditions must be inspected and approved by Washington State Department of Labor and Industries Factory Assembled Structures prior to use as a mobile food unit in the state:

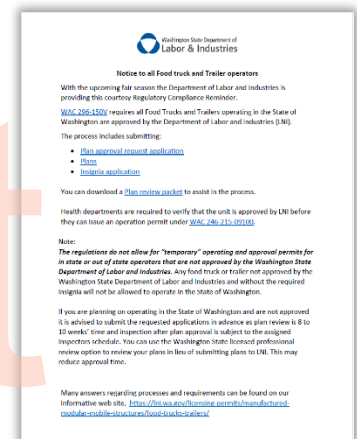
- Vehicle is licensed and street/highway ready
- Less than 8.5 feet wide with an inside work area less than 40 feet long
- Used to sell food
- Boarded or temporarily occupied by workers, but not customers
- Built on a permanent chassis
- With water plumbing, propane gas piping, or an electrical system (120v or greater)

Structures not meeting the above parameters will need review from L&I, local building department, or other jurisdictional authority. More details here: [Chapter 296-150W WAC](#)

### Mobile Food Unit

Mobile food unit means a readily movable structure that meets the definition of a food establishment. Readily movable indicates the unit is able to be moved during the operating period if needed and to the commissary daily or other regular frequency as approved. As a food establishment, mobile food units are required to meet chapter 246-215 WAC, including the physical facility requirements for floors, walls, and ceilings in Part 6.

Mobile food units are generally licensed annually and driven, pulled, or pushed down a sidewalk or street. To meet the need of the customer and community, mobile food units vary in capacity from foot-powered pushcarts to street-ready full-service units. Mobile food units are not limited to a fixed



location, and as such, do not have permanent water, power, or sewer connections. Due to the capacity that varies with each mobile, there are different support requirements for mobiles in order to support food safety while operating without fixed facilities and utilities. Mobile food units that do not meet the full requirements of WAC 246-215 may be evaluated for variance of the affected rule provision. As required by WAC 246-215-08110 and 08115, waivers must be evaluated by the regulatory authority to ensure the proposal does not likely cause health hazards or nuisances.

### **Plan Review Reciprocity (RCW 43.20.120)**

Beginning May 1, 2020, a regulatory authority must accept a completed and approved plan review of a mobile food unit from another regulatory authority if:

- The applicant has obtained a valid permit to operate the mobile food unit from another regulatory authority; and
- The applicant provides the following to the regulatory authority from which the applicant is seeking a permit:
  - A copy of the current operating permit from the original regulatory authority;
  - A copy of the complete approved plan review from the original regulatory authority;
  - The most recent inspection report of the mobile food unit from the original regulatory authority that demonstrates compliance with food safety standards; and
  - Any commissary agreements that the applicant was required to maintain under the permit from the original regulatory authority.
- Except as provided below, the regulatory authority may not require an applicant to submit any additional documents or inspections to obtain a permit to operate the mobile food unit.
  - The regulatory authority may require an applicant to submit any restroom agreements the regulatory authority determines are necessary to comply with department and state board regulations.
  - The regulatory authority may require an applicant to submit additional commissary agreements as required by department and state board regulations unless:
    - A mobile food unit is exempt from the use of a commissary under RCW 43.20.148; or
    - A mobile food unit returns to its approved commissary after each day of service as described in the approved plan.
- A regulatory authority may charge the applicant an annual permit fee, but may not charge a plan review or inspection fee.

### **Time/Temperature Control for Safety Food (TCS)**

Time/Temperature Control for Safety Food means food that requires time or temperature control for limit pathogenic bacterial growth or toxin formation.

### **Servicing Area**

Servicing Area means an operating base location to which a mobile food unit or transportation vehicle returns regularly for such things as vehicle and equipment cleaning, discharging liquid or solid wastes, refilling water tanks and ice bins, and boarding food.

## Physical Facility and Capacity

### Handwashing Facilities

All licensed food establishments are required to have handwashing facilities in both food preparation and restroom areas.

**Onboard capacity:** A convenient, dedicated handwashing sink must be available on the mobile for employees whenever handling unpackaged foods. This sink must have warm running water, soap and paper towels at all times.

The following method is recommended to determine water capacity needed for handwashing:

Maximum number of onboard workers x 1 gph x maximum hours of operation between water access = water tank storage capacity needed. Minimum of 5 gallons at the beginning of the workday is recommended.

**Restroom capacity:** A plumbed handwashing sink is required at locations used for mobile operations. See section on Restrooms.

### Refrigeration Requirements

Except during active preparation, cooking, or cooling, cold Time/Temperature Control for Safety Foods are required to be stored 41°F or colder. Unless otherwise approved by a local authority for operation within that jurisdiction, mechanical refrigeration must be used to maintain product temperature for TCS which are required to be held at or below 41°F. The storage of food in contact with water or undrained ice is not permitted.

Unless otherwise approved by a local authority to use propane power for operation within that jurisdiction, mobiles approved to store TCS overnight must have refrigeration equipment continuously powered by electrical, generator, or battery sources.

**Commercial.** Refrigeration equipment meeting cleanability and performance standards must be used to maintain product temperature for TCS foods required to be held at or below 41°F. Commercial equipment meeting NSF/ANSI Standard 4 or 6 must be used for cooling of TCS foods or for storage of TCS foods over 24 hours.

**Domestic.** Household freezer units capable of maintaining TCS in the frozen state may be used. Domestic refrigerators may be used to store nonTCS. Unless approved by local authority for use within that jurisdiction, domestic refrigeration may not be used to store TCS. These units must meet cleanability and temperature standards.

**Insulated Coolers.** Insulated coolers may be used to store nonTCS as long as food contamination does not result. Materials and construction must meet cleanability standards. Insulated coolers may be approved for storage of TCS on a case-by-case basis for operation within a jurisdiction.

### Hot Holding Capacity

Consumer-level equipment such as roasters, crockpots, and approved containers on the stove may be used to keep TCS hot at 135°F or above as long as they are functional and able to be cleaned as

required. Materials and construction must meet cleanability standards. Each planned piece of electrical equipment will be considered for the maximum power usage (see Power Section).

### **Fresh Water Capacity and Maintenance**

**Source.** Fresh drinking water must be from an approved public water connection. Hoses used to fill onboard tanks must be food grade. Domestic/home sources of water that are on an unapproved supply or garden hoses are not permitted. Filling water tanks from an approved public water supply (verified by utility bill or other proof) at a private residence or similar is approvable.

**Hot water.** Wash water for dishwashing must be 110°F. One 3-compartment sink basin must be able to be filled at 110°F and still allow for at least 1 gpm of warm water at the handwashing sink within the recovery rate listed for the hot water heater.

**Water tank sizing.** The fresh water tank must be large enough to hold all water needed for an operation cycle (from time of fill of fresh water to disposal of wastewater). The following must be considered when sizing the needs for fresh water. **Note:** This list is cumulative and shall be added to determine max usage.

**Handwashing sink(s).** If unwrapped food is handled onboard, enough water must be available to allow for each food worker onboard to wash routinely and as required by code.

- ☐ Allow for at least 1 gallon per food worker per hour of operation cycle.
- ☐ Allow 2 gallons per food worker per hour with on-demand (rather than batched) raw meat prep.

**Three compartment sinks.** If TCS are prepared onboard, enough water must be available to fill two of the sinks to submerge on-board utensils every 4 hours. Operators that prepare (such as mix, cut, form) raw meat on-board will need to have one additional warewashing for batch operations or every 4 hours for on-demand raw meat preparation.

- ☐ Operators that do not prepare raw meat and are able to maintain sufficient equipment to batch wash or use a commissary for warewashing may be considered for 1 full wash at end of day.
- ☐ Operators using a commissary or servicing area for warewashing may be approved to batch utensils.

**Produce prep sink.** Self-contained mobiles and other units must purchase ready-to-eat fruits and vegetables or provide a dedicated sink for produce washing. Allow for 15 gallons per hour for continuous produce preparation; can be batched to once per day. Sink must be indirectly drained to the waste stream.

**Meat prep sink.** Self-contained mobiles marinating or preparing (mixing, cutting, or forming) raw meat in a sink basin will provide a sink dedicated for meat prep. Allow for 15 gallons per hour, batched to once per day or less frequent procedure if possible. Sink must be indirectly drained to the waste stream.

**Additional fixtures.** When other fixtures such as toilets, drink machines, running water dipper wells, or ice makers are provided, the water supply shall be sized to include the manufacturer specification for each figure.

**Water system flushing.** The fresh water tank will be flushed and sanitized according to manufacturer suggested specifications and at least annually or after usage disruptions of 14 days or more.

General water system flushing guidelines (provided for basic understanding, follow manufacturer directions):

1. Drain the fresh water tank, hot water tank, and all water lines.
2. Determine the size of your water system—add the size of fresh water tank, the size of hot water tank storage, and 2-3 gallons for the water lines servicing your mobile unit.
3. Mix food grade chlorine bleach with water prior to adding to the fresh water tank. For pressurized systems, add the bleach water solution to the food grade hose before connecting to the approved water supply.

Fresh water size	Amount of Chlorine Bleach	Mix with water
40 gallons	1 cup	4 gallons
50 gallons	1.25 cup	5 gallons
60 gallons	1.5 cup	6 gallons

4. Continue to fill the tank with fresh water.
5. Open all faucets (hot and cold) and run the water until the smell of chlorine bleach is noted. Turn off the faucets.
6. Allow the system to sit for at least 4 hours or overnight.
7. Drain and rinse the water lines with fresh water until the smell of chlorine bleach is not noted.
8. Fill the tank to resume food service.

### Water pressure.

Water under pressure must be provided to all fixtures and equipment required to use water (WAC 246-215-05140). Water pressure of at least 20 PSI is required for sufficient handwashing and to ensure basic performance within the mobile food unit. Additionally, equipment such as ice makers, water heaters, water softeners, water filters, refrigerators often have elevated water pressure demand as listed in manufacturer specifications.

A performance measure for water pressure at the handwashing sink is to fully open the taps and fill a 32-ounce container with warm water. The container should fill within 15 seconds.

### Wastewater Collection and Disposal

**Wastewater tank sizing.** The wastewater tank must be sized at least 15% larger than the freshwater tank. This tank size does not include water requirements for ice machines, espresso units, and other fixtures that use water consumed as an ingredient.

**Disposal.** Liquid waste shall be emptied from the retention tank to an approved sewage disposal system every time the fresh water is filled. Wastewater must be removed so that a public health hazard or nuisance is not created. Dumping wastewater onto the ground, storm drainage, carwash facility, or other non-approved sanitary sewage system is not allowed. Written records of disposal (including date, location of disposal, and quantity emptied) must be maintained onboard for at least 6 months.

### Power Capacity

TCS food must be maintained at proper temperatures at all times during storage, transport, operation, and service. Electrical power supplied must meet the maximum output desired.

*Wattage determination.* The maximum wattage for all electrical equipment will be determined to verify sufficient capacity on the unit. To determine wattage, appliance voltage (most equipment used on mobile units is likely 120V) will be multiplied by its required current in Amps. For example, a 120V



refrigerator may need 10 Amps of current, which equals 1200 Watts needed to operate. All of the wattages of permanent and removable equipment (such as blenders, electric roasters, portable griddles) will be added to determine maximum. Also include planned nonfood equipment, such as AC units and televisions, in the calculation.

Electrical Appliance	Running	Surge/Reactive
Blender	350 W	500 W
Color TV	160 W	160 W
Coffee Maker	1,000 W	0 W
Deep Freezer	500 W	1,500 W
Electric Kettle	1,200 W	3,000 W
Electric Stove (8" Element)	2,100 W	0 W
Electric Water Heater (6 gal)	1,440 W	1,440 W
Food Dehydrator	800 W	0 W
Food Processor	400 W	0 W
Fryer	1,000 W	0 W
Light bulbs (75W)	75 W	75W
Microwave	1,000 W	0 W
Pressure Cooker	700 W	0 W
Refrigerator / Freezer	700 W	2,200 W
Rice Cooker	200 W	500 W
Roof-Top AC (13,500 BTU)	1,500 W	2,000 W
Toaster	850 W	0 W

*Maximum amperage.* The most amperage available for mobile units is generally 50 Amps and this is not necessarily available. Mobile units planning to use this much current will need to ensure access to a power line rated for 50A.

*Confirmation of connection.* Power outlet adaptors vary with configuration and amperage. Mobile food unit operators must be prepared to ensure proper connections are provided prior to beginning food service.

### Floors, Walls, and Ceilings

*Exterior.* Exterior surfaces of mobile food units must be weather-resistant (06100) and effectively protect the establishment from unauthorized access from people (02115) and entry of pests (06265).

*Interior.* Like all non-temporary food establishments, the indoor areas of food preparation and storage areas (except for dry storage which may have unsealed porous surfaces) for mobile food units must be smooth, durable, and easily cleanable. There may not be exposed utility service lines or pipes on the floor.

*Walls.* Unless operated in a larger structure, a mobile food unit's outer openings must be protected against the entry of insects, rodents, and the weather through the use of windows, doors, screens, or other effective means.

*Variances.* Like all food establishments, the physical structure must be evaluated for code compliance. Each food establishment deviating from code requirements and allowances may apply for variance, but must satisfactorily prove to the regulatory authority of safe operation equal to the code.



Examples of mobile food unit modifications that might need unique operating plans, variances, or additional jurisdictional approvals include:

- **Walls, Floors, and Ceilings.** Carts and other open-air establishments must provide the same level of food safety required by a fully-enclosed food establishment to protect food, food contact surfaces, and equipment.
  - Establishments requesting variance of sections 06100 and 06265 will need to detail suitable protections, such as integrated food covers, menu restrictions, or limited food preparation on board.
- **Ventilation and Fire Safety.** Establishments using non-integrated grills, deep fat fryers, smokers, generators, and similar pieces of equipment that generate heat, smoke, fumes, and grease-laden vapors meet fire marshal and other jurisdictional requirements for ventilation, distance clearances, and fire suppression. Like all food establishments, equipment should be used according to the manufacturer's operating requirements. Cooking equipment should be segregated from the public for a recommended distance of at least 4 feet (OSHA Standard 1910).
  - Establishments using non-integrated cooking equipment or fuels must confirm operating requirements with the jurisdictional authorities. Satisfactory compliance includes letters, attestations, or similar information from the jurisdictional authority with inclusion of the safety requirements in the operating plan.
- **Lighting.** Adequate lighting by artificial or natural means is required during all hours of operation. Establishments requesting a variance of 06340 will need to provide a safe alternative, such as no nighttime food service.
- **Plumbing and Waste Disposal.** Fresh water, wastewater, grease disposal, and garbage control must follow code requirements and allowances.

## Advanced Food Preparation Processes, Risks, and Controls

### Cooling

Operators may only cool TCS on the mobile food unit as approved by the regulatory authority that issued the operating permit. In addition to limited refrigerated space, cooling of nonTCS should not be approved in prep tables or other frequently accessed pieces of equipment.

Mobiles with reach-in refrigeration able to be dedicated to cooling (such as top-shelf cooling) may be used for cooling TCS in shallow pans within the amount of area dedicated to cooling. Ambient equipment temperatures must be electronically monitored or recorded twice per day for cold-holding unit used to store or cool TCS overnight. Temperature logs must be maintained for 6 months.

Detailed procedures and monitoring must be included in the written plan of operation.

### Produce Washing

All fruits and vegetables, unless received as a ready-to-eat product, need to be rinsed under running water before cutting, preparing, combining with other ingredients, serving, or cooking. A dedicated sink is required for produce rinsing. If the regulatory authority approves minimal produce washing in the three-compartment sink using a colander or other system, the detailed approval must be written in the plan of operation.

### Using additional equipment

Pieces of equipment used for food preparation such as blenders, slicers, large cutting boards, large bowls, and mixers require frequent washing when used with Time/Temperature Control for Safety food. In addition to needing a dedicated food prep area, the pieces of equipment will require a full sanitizing cycle every four hours of use and will be considered in the water capacity requirements.

### Raw meat handling

Separation of raw animal foods (meat, fish, poultry, etc.) is critical on mobile units with limited floor space that handle raw meat onboard. Raw meat handling (thawing, grinding, forming patties, etc.) also requires an additional amount of water needed to wash utensils.

*Raw meat sink.* If raw meat products need preparation in a sink basin (such as thawing, repackaging, rinsing under water) a separate sink basin dedicated for raw meat prep is needed. This sink may not be used for produce, utensil, or other purposes.

*Grinding.* Purchasing pre-ground meats reduces the risk of employee, equipment, and surface contamination for retail food operators. Mobile operators that grind whole cuts of meat onboard will need a dedicated prep surface away from ready to eat food and preparation areas. Additionally, grinding of raw meat may only occur during closed hours while no other food is prepared to reduce the risk of cross contamination. All food equipment, surfaces, refrigerator handles, etc. used during the grinding process must be washed, rinsed, and sanitized and employee hands must be washed prior to moving to other food preparation.

Due to the high risk involved, this menu item and a written SOP prepared by the operator must be reviewed by the regulatory authority prior to adding to the menu.

*Cooking >1" thick meat.* In addition to being a cross-contamination risk while raw, meat is energy-dependent to cook and time-consuming to cool, especially large cuts. Also, due to size, large cuts are not generally cooked-to-order and need plans and equipment for hot holding. Due to the potential for leftover meat products at the end of the serving day, meats thicker than one inch in thickness need review from the regulatory authority prior to being added to the menu. An SOP that describes how the meat will be thawed prior to cooking, how and where the meat will be cooked, and how the meat will be served or hot held and discarded or cooled at the end of the day must be provided to the regulatory authority for consideration of approval.

### Deep fat Frying

Deep frying in grease or oil generates additional equipment needs for the mobile operator. In addition to a Type 1 hood over the entire cooking surface, the presence of fats, oils and grease require a standard operating procedure for handling grease in a mobile unit. While most grease-generating food facilities have access to high pressure or high temperature hoses to clean floor and wall surfaces, the mobile operator will need to have alternate plans to maintain a clean trailer. For self-sufficient mobiles, a 20-pound grease collection unit between the 3-compartment sink and the wastewater tank or alternative cleaning procedure should be required. In addition, an SOP indicating cleaning frequency, procedures, and location must be provided.

## **Advance Preparation**

Time/Temperature Control for Safety foods need temperature control for safety and are generally safer if they are consumed as close to preparation as possible. In addition, temperatures are easier to maintain in environments without temperature extremes and in equipment that is not opened frequently. **TCS prepared on the mobile must be served the same day they are prepared.**

*Variance consideration:* Mobiles that are able to maintain TCS in proper temperature ranges are able to apply for a variance to the regulatory authority within its jurisdiction. Verification procedures for ensuring temperature control for overnight should need to include temperature monitoring and logging via electronic methods or manual methods at least twice per day.

## **Cleaning and Sanitizing**

### **Dishwashing**

Like all food establishments, all utensils used to prepare Time/Temperature Control for Safety food must be washed, rinsed, and sanitized every 4 hours of use or after each use with raw meat. Due to space and water limitations, most mobile operators bulk wash their utensils at the commissary location. Self-contained mobiles that do not use a commissary will need to address the potential increase in water usage.

### **Hood filters and other pieces of equipment**

Operators that need to clean hood filters, grease traps, or other grease-laden equipment will need to have a plan for cleanout following the manufacturer recommendations for cleaning frequency with a method of disposal for the wastewater. (Note: domestic or Type II hood filters do not need a specialized cleaning protocol.)

### **Floors, non-food contact surfaces, and exterior of mobile**

Mobile food units are required to keep the working environment clean and clear of excessive debris, grease, noxious fumes, and dirt. Unlike food establishments with dedicated plumbing, recycling, and garbage units, mobiles must have partnerships with other locations to properly wash their units and dispose of garbage and surface water. All equipment needed for cleaning the mobile must be maintained away from food and food contact surfaces on the mobile unless they are stored at an approved commissary or servicing location.

## **Support Units**

### **Commissary**

A commissary is an approved food establishment or other approved facility in which food, containers, or supplies are kept, handled, prepared, or stored. The commissary must be equipped with facilities needed for servicing the needs of each type of operation.

If a written operation plan is approved by the regulatory authority and followed by the operator, a mobile food establishment may not need to report to the commissary daily or on a regular basis. Additionally, self-contained mobile food units with approved procedures for water collection, water

discharge, supply storage, equipment maintenance and cleaning, and food delivery frequency and storage, may reduce the frequency of commissary use and rely on servicing areas.

### **Commissary Capacity**

Depending on the menu and plan of operation, the mobile food unit operator must have access to the following in the commissary:

*Any food handling, shelf-stable dry storage, or cleaning of equipment.*

- ☐ At least one handwashing with pressurized hot and cold water that is conveniently located and used exclusively for handwashing.
- ☐ A conveniently located toilet room.
- ☐ Adequate space for the sanitary storage of food, equipment, utensils, linens and single-service, or single-use articles.
- ☐ Approved connection to approved water supply.

*Food contact utensil washing.*

- ☐ A three-compartment sink.
- ☐ Other approved equipment for warewashing.

*Equipment cleaning, fresh water connection, or wastewater disposal.*

- ☐ Potable water connection and/or sanitary water dump station.
- ☐ A service sink with hot and cold water under pressure.

*Storage or preparation of TCS foods.*

- ☐ Cold holding capacity for long-term storage
- ☐ Adequate hot and cold holding equipment as necessary for needed food preparation
  - Food stored unattended in the commissary must be protected from incidental or purposeful contamination such as in locked storage containers.

*Unique operating needs as determined by the operator.*

- ☐ Secure location to store the mobile food unit
- ☐ Capacity to operate a portable piece of cooking equipment, such as a smoker

*Commissary use verification.* The mobile food unit person in charge must document each presence at the commissary on a written log. The records must be maintained for at least one year and available for inspection upon request.

### **Servicing Area**

Any food operations not conducted on the mobile food unit or approved commissary must be completed at an approved servicing area and listed in the plan of operation.

## Restroom Availability

*Distance.* Current rule requires an accessible restroom within 500 feet at all times for mobile units at any one location for more than one hour.

*Restroom agreement.* Either a restroom agreement with the restroom owner must be submitted to the regulatory authority or an identified available public restroom location, such as available for customers at the event location, must be available to the mobile operator at all times of operation. Pushcarts are exempt from the restroom agreement requirement.

*Facilities.* Restroom must have soap and running, tempered and pressurized water, and a single-use drying device. If operators need to supply their own soap and paper towels for a public-access restroom, the materials must be readily available in the mobile unit and taken each time to the restroom.

*Private/Domestic.* Operators with a completed restroom agreement may use a private restroom. Operators must confirm soap, running water, and disposable paper towels are available at all times of operation.

*Onboard.* Mobile food units with onboard toilet capacity may be approved with the following conditions:

- a. Space dedication for toilet room does not limit or contaminate food preparation space
- b. Additional water supply is available to meet usage demand. Estimated usage is 1 use per employee every four hours. Manufacturer usage information will indicate the gallons of water used per flush.
- c. Dedicated handwash sink in toilet room/immediately adjacent (second handwash sink needed on-board)
- d. Dedicated holding tanks for sewage are separate from food preparation water storage
- e. Approval by Labor and Industries and other jurisdictional agencies
- f. Confirmed contract for disposal with septic pumper, or
  - i. Written procedures and staff training on draining sewage tanks
  - ii. Written location plan for disposal
  - iii. Dedicated drainage hoses and dedicated storage when stowed
  - iv. Dedicated time or employee (rather than food worker) for disposal

## Mobile Name and Route Posting

Mobile food units are required to permanently display the business name on the exterior of the unit in printed letters at least four inches in height in a manner easily visible during operation.

Additionally, mobile food units are required to notify the days, hours and locations of operation in a manner acceptable to the regulatory authority, such as by telephone, electronic mail, written correspondence, or social media link

## Self-Contained or Commissary Exempt Mobiles

Self-Contained Mobiles units are able to support the safe storage, preparation, and service of the entire menu. This includes safety of TCS and non-TCS foods, cooking, hot and cold storage, dry storage, utensil washing, handwashing, and all food handling activities on the unit. The unit must have a self-contained potable water supply, wastewater storage system, and sustainable mechanical refrigeration capable of

sustaining the menu. In addition, approved plans for restroom availability, fresh water replenishment and disposal, cleaning and maintenance must be followed.

**Prior to considering a mobile food unit self-contained, the following must be confirmed.** Any function not able to be conducted on a mobile food unit may be allowed to occur at a servicing area or other base of operation.

- All equipment and utensils needed for complete preparation of the approved menu are contained on the mobile unit.
  - All storage containers, serving utensils, preparation equipment must be able to be stored and washed on the mobile food unit.
- The mobile food unit is able to be protected from accidental and intentional contamination of food, especially when the unit is not staffed.
  - The mobile food unit may not be parked at a private residence during its permit period except as approved on a temporary basis by the regulatory authority.
- The mobile food unit can maintain required food storage temperatures during storage, preparation, service, and transit.
  - Temperature control for Time/Temperature Control for Safety Foods stored on board for more than eight hours must be verified.
    1. Manual temperature logs after unmonitored storage or disruption of power for transit;
    2. Electronic system that continuously monitors time and temperature and is visually examined for proper operation at least twice daily; or
    3. Other verifiable system approved by the regulatory authority.
- The mobile food unit has a dedicated handwashing sink to allow frequent handwashing at all times.
- Potable water supplies meet calculated maximum need based on equipment usage, menu, and time between operational periods.
- All planned food preparation for the approved menu can be prepared on the unit.
- All equipment, tools, and equipment needed for cleaning and sanitizing the unit are safely stored on the mobile unit.
  - Materials must be stored to prevent contamination of food supplies and food contact surfaces.
  - Operating plan must include cleaning procedures to clean food contact surfaces used with Time/Temperature Control for Safety food every four hours, clean equipment surfaces and remove debris daily, and thoroughly wash floors, walls and ceilings monthly.
    1. Cleaning schedules should follow manufacturer recommendations.
      - a. Examples of equipment with unique cleaning schedules include:
        - i. Hood filters
        - ii. Hot water heater descaling
        - iii. Refrigeration unit coils
        - iv. Fans
      2. Cleaning of Exhaust Hood should follow cleaning schedule as outlined in NFPA 96:
        - a. Monthly: Solid Fuel Cooking appliances
        - b. Quarterly: High volume/24-hour
        - c. Semi-Annually: Moderate/routine volume operations
        - d. Annually: Low volume/seasonal operations
        - e. Cleaning protocol may indicate a service provider if cleaning records are maintained.

- ☐ All food, water, and ice are prepared on-board the mobile or obtained from an approved source.
- ☐ Private residences may be approved for storage of a mobile food unit when not in use. Preparation or storage of food, water, ice, or equipment used for the food operation is not permitted inside a domestic residence.
- ☐ Wastewater and garbage must be sanitarily removed following an approved written plan or by a licensed service provider.

### **Mobile Food Unit Plan Review Materials**

A complete mobile food unit plan must include the following material supplied by the applicant.

- ☐ Menu and food preparation steps
- ☐ Floor plan
- ☐ Equipment specifications and location
- ☐ Finish schedule
- ☐ Source of water and specifications of the on-board plumbing
- ☐ Site used for sewage disposal
- ☐ Availability of restrooms for employee
- ☐ Operating procedures
- ☐ Cleaning schedule

### **Plan Review Reciprocity.**

Mobile food unit operators applying for plan review reciprocity intend to use the plan review completed by another Washington local health jurisdiction. All materials must be complete and provided by the applicant (see table on next page). Following state law, no additional plan review or inspection fees may be charged if the operator meets the conditions of RCW 43.20.120.

If the mobile food unit continues to meet all the requirements for commissary exemption or returns to their commissary each day of service as in the operating plan, the secondary county may not require additional commissary agreements. The secondary county may require additional restroom agreements.

### **Application of RCW 43.20.120**

The statute does not include prescriptive language limiting the plan review reciprocity or approved plans – as such, current guidance (as of June 2024) is for the secondary jurisdiction to accept complete plan reviews (including those approved before May 1, 2020) and approved plans of operation (even if original approvals include code variances) that meet the required submissions listed in RCW 43.20.120 and WAC 246-215-09115.

### **Last Inspection Report.**

The most recent routine operating inspection report from the primary regulatory authority must be provided as part of a secondary permit application to demonstrate compliance with food safety standards. The routine inspection should be a measure of the facility, equipment, food worker, and management performance. Any marked red or blue item risk factors would indicate the mobile food unit operation is not in compliance with food safety standards.

Regulatory authorities considering a secondary permit application should only accept an inspection report with no demerits. The applicant should work with the primary regulatory authority to permanently correct any food safety gaps prior to continuing application with the secondary regulatory



authority or may consider pursuing the routine mobile food unit plan review process in the new jurisdiction.

To ensure consistent application around the state, new mobile food units should be inspected for routine operating standards within 60 days of beginning operation.

Draft

**Mobile Food Unit Application Checklist for Plan Review Reciprocity**

<i>Item</i>	<i>Description</i>
1	<p>Application</p> <p>Provide completed application</p> <p><b>Applicant:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Name</li> <li><input type="checkbox"/> DOB or UBI</li> <li><input type="checkbox"/> Mailing Address</li> <li><input type="checkbox"/> Telephone</li> <li><input type="checkbox"/> Signature of applicant</li> <li><input type="checkbox"/> Contact information for persons responsible for food establishment</li> </ul> <p><b>Food establishment:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Name</li> <li><input type="checkbox"/> Mailing Address/Facility Location</li> </ul>
2	<p>Plan Review Documents</p> <p>Provide the following information</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Menu and food preparation steps</li> <li><input type="checkbox"/> Floor plan</li> <li><input type="checkbox"/> Equipment specification and location</li> <li><input type="checkbox"/> Finish schedule</li> <li><input type="checkbox"/> Source of water and on-board plumbing specifications</li> <li><input type="checkbox"/> Employee restroom location (500' feet)</li> <li><input type="checkbox"/> Operating procedures</li> <li><input type="checkbox"/> Cleaning Schedule</li> </ul>
3	<p>Commissary, Servicing Area, or Exemption</p> <p>Conducted at Commissary or Servicing Area or Exemption</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Storage: Unit, refrigerated food, dry goods, utensils, cleaning supplies</li> <li><input type="checkbox"/> Source: Fresh water, ice</li> <li><input type="checkbox"/> Preparation: Cooking, cooling, thawing, produce wash</li> <li><input type="checkbox"/> Sanitation: Cleaning and washing of smallwares, utensils, unit</li> <li><input type="checkbox"/> Disposal: Wastewater, garbage</li> <li><input type="checkbox"/> Power: Electrical connections available</li> <li><input type="checkbox"/> Availability: Frequency needed, times open, equipment used</li> <li><input type="checkbox"/> Functionality: Restroom, handwashing</li> </ul>
4	<p>Photos (Recommended)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Interior: Images should show all equipment as installed</li> <li><input type="checkbox"/> Exterior: L&amp;I insignia for all boarded units, side panels for identification</li> </ul>
5	<p>Application</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Completed application for operating permit</li> <li><input type="checkbox"/> Materials listed in Items 2-3 above</li> <li><input type="checkbox"/> Proposed itinerary (such as social media account, StreetFoodFinder)</li> </ul>
6	<p>Approval Letter</p> <p>Provide a copy of the approval plan review letter.</p> <p><i>Note: Variances listed on approval letter are likely transferrable</i></p>
7	<p>Current Permits</p> <p>Provide a copy of the valid permit for:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Mobile food unit</li> <li><input type="checkbox"/> Commissary kitchen (unless exempt)</li> </ul>
8	<p>Inspection Report</p> <p>Provide a copy of the most recent routine inspection report from the original permitting agency that demonstrated compliance with food safety standards</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Mobile food unit</li> <li><input type="checkbox"/> Commissary kitchen (or proof of exemption)</li> </ul>
9	<p>Restroom Form</p> <p>Restrooms must be available for employees within 500 feet of the mobile if in one location for one hour or more.</p>
10	<p>Commissary Form</p> <p>A secondary commissary is required if original commissary plan of operation is not able to be followed.</p>

## Mobile Food Unit Equipment Requirements

Mobile Food Unit Equipment Requirements Consideration of Commissary Usage			
Risk Factor	Self-Sufficient Mobile with Reduced Servicing Access Mobile Type	Mobile with Daily Servicing Access Mobile Type	Food Protection
Employee Hygiene & Handwashing	<ul style="list-style-type: none"> <li><input type="checkbox"/> Dedicated handwash sink</li> <li><input type="checkbox"/> Tempered heat source</li> <li><input type="checkbox"/> 1 gallon of water per hour of operation available per worker</li> <li><input type="checkbox"/> Water pressure ~1 gal per minute</li> <li><input type="checkbox"/> Hands-free flow</li> <li><input type="checkbox"/> Water capacity included in requirement until next service connection</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Dedicated handwash sink</li> <li><input type="checkbox"/> Tempered heat source</li> <li><input type="checkbox"/> 1 gallon of water per hour of operation available per worker</li> <li><input type="checkbox"/> Water pressure ~1 gal per minute</li> <li><input type="checkbox"/> Hands-free flow</li> <li><input type="checkbox"/> Water capacity for daily service</li> </ul>	Hot, running water, soap, and single use~ towels are required. If no hot, running water, soap, or paper towels: immediately close the food establishment until repaired.
TCS Proper Temperature: Cold Holding	<ul style="list-style-type: none"> <li><input type="checkbox"/> Commercial refrigeration for TCS</li> <li><input type="checkbox"/> domestic freezers approvable for frozen TCS</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Commercial refrigeration for TCS</li> <li><input type="checkbox"/> domestic freezers approvable for frozen TCS</li> </ul>	Food must be covered and TCS held at 41°F or colder. Frozen TCS must be maintained frozen.
TCS Proper Temperature: Transit	<ul style="list-style-type: none"> <li><input type="checkbox"/> All TCS must be 41°F or colder when received at mobile</li> <li><input type="checkbox"/> Mobile food units travelling greater than 2 hours must have equipment capable of maintaining temp control</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> All TCS must be 41°F or colder when received at mobile</li> <li><input type="checkbox"/> Mobile food units travelling greater than 2 hours must have equipment capable of maintaining temp control</li> </ul>	Bacteria grow when temperatures are not controlled. Food in vehicles can warm to unsafe temperatures due to traffic conditions, equipment limitations, and other factors.
TCS Proper Temperature: Cooling	<ul style="list-style-type: none"> <li><input type="checkbox"/> Top shelf or dedicated commercial reach-in</li> <li><input type="checkbox"/> Not in prep table</li> <li><input type="checkbox"/> Not in beverage cooler</li> <li><input type="checkbox"/> Twice daily ambient temp logs required for cooling or overnight TCS storage</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Top shelf or dedicated commercial reach-in</li> <li><input type="checkbox"/> Not in prep table</li> <li><input type="checkbox"/> Not in beverage cooler</li> <li><input type="checkbox"/> Twice daily ambient temp logs required for cooling or overnight TCS storage</li> </ul>	Unless specialized cooling procedures are approved, food may only be cooled in 2" uncovered containers in equipment operating at 41°F or colder
Proper Temperature: Hot Holding	<ul style="list-style-type: none"> <li><input type="checkbox"/> Domestic/stovetop equipment as electrical and space capacity permits</li> <li><input type="checkbox"/> Integrated steam table recommended for 3+ hot held</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Domestic/stovetop equipment as electrical and space capacity permits</li> <li><input type="checkbox"/> Integrated steam table recommended for 3+ hot held</li> </ul>	Hot TCS must be maintained at 135°F or above.
Protection from Environmental Contamination: Floors, Walls, Ceilings	<ul style="list-style-type: none"> <li><input type="checkbox"/> Enclosed truck or trailer with service windows</li> <li><input type="checkbox"/> Pushcarts or other units with non-permanent walls and ceilings (such as umbrella or canopy) may be approved by variance.</li> </ul>		Food must be protected from outdoor weather conditions and contamination from water, insects, rodents, pests, dust, dirt, and bird droppings.

Mobile Food Unit Equipment Requirements Consideration of Commissary Usage			
Risk Factor	Self-Sufficient Mobile with Reduced Servicing Access Mobile Type	Mobile with Daily Servicing Access Mobile Type	Food Protection
Ingredient Storage	<ul style="list-style-type: none"> <li>□ All storage on approved mobile establishment.</li> <li>□ Storage not allowed at private residence.</li> <li>□ See calculation below</li> </ul> <p>Required storage area for onboard ingredient storage for self-contained mobiles: Required area = [Volume per meal (0.25ft<sup>3</sup>) x Number of Meals between deliveries] / Height in feet x 0.3 (multiplier used for Usable Space)</p>	<ul style="list-style-type: none"> <li>□ Supplemental storage in an approved commissary or servicing area.</li> <li>□ Storage not allowed at private residence</li> </ul>	All food and equipment must be protected from accidental, incidental, and purposeful contamination at all times.
Equipment and Utensil Storage	<ul style="list-style-type: none"> <li>□ All equipment used for food prep and cleaning <b>must be stored onboard</b>.</li> <li>□ Separation of cleaning chemicals from food and food contact surfaces.</li> </ul>	<ul style="list-style-type: none"> <li>□ Separation of cleaning chemicals from food and food contact surfaces.</li> </ul>	All food and equipment must be protected from accidental, incidental, and purposeful contamination at all times.
Water Capacity	<ul style="list-style-type: none"> <li>□ Maximum water usage between operation cycles</li> <li>□ Handwashing: 1 gallon per hour of operation per worker</li> <li>□ HW Pressure: ~1 gpm (32oz/15 seconds)</li> <li>□ Warewashing: Able to fill 2 compartments of sink high enough to submerge utensils twice/day (or every 4 hours if onboard TCS prep)</li> <li>□ Temperature: 110°F for onboard warewashing</li> </ul>	<ul style="list-style-type: none"> <li>□ Handwashing: 1 gallon per hour of operation per worker</li> <li>□ HW Pressure: ~1 gpm (32oz/15 seconds)</li> <li>□ Warewashing: Able to fill 2 compartments of sink high enough to submerge utensils twice/day (or every 4 hours if onboard TCS prep)</li> <li>□ Temperature: 110°F for onboard warewashing</li> </ul>	Potable water is needed for proper food preparation, handwashing, and utensil cleaning. Water may not be rationed on a mobile unit. A readily-available and approved source of water is required.
Three Compartment Sinks	<ul style="list-style-type: none"> <li>□ 3-compartment sink installed on unit</li> </ul>	<ul style="list-style-type: none"> <li>□ 3-compartment sink onboard or approved with limited menu and sufficient utensils onboard with warewashing at commissary</li> </ul>	Equipment used with TCS must be washed, rinsed, and sanitized every 4 hours or after use with raw meat.
Food Prep Sinks	<ul style="list-style-type: none"> <li>□ Produce prep for non-meat ingredients requiring rinsing onboard.</li> <li>□ Dedicated meat prep sink required for raw meat ingredients prepared (cut, ground, etc) onboard.</li> </ul>	<ul style="list-style-type: none"> <li>□ Produce prep for non-meat ingredients requiring rinsing onboard.</li> <li>□ Dedicated meat prep sink required for raw meat ingredients prepared (cut, ground, etc) onboard.</li> </ul>	Raw, non ready-to-eat foods, may have surface contamination that can spread in food service. Raw produce must be rinsed under running water before preparation. Due to the potential surface contamination on meat and limited water availability on mobiles, all meat prep requiring sink prep must be in a dedicated sink.

Mobile Food Unit Equipment Requirements Consideration of Commissary Usage			
Risk Factor	Self-Sufficient Mobile with Reduced Servicing Access Mobile Type	Mobile with Daily Servicing Access Mobile Type	Food Protection
Cleaning of Mobile	SOP for cleaning unit at approved facility	SOP for cleaning unit at approved facility	Cleaning of facility can be gauged based on menu and use of the mobile. However, all cleaning agents, water, and debris will need to be properly disposed and may require a servicing area.
Food Preparation Area	<input type="checkbox"/> Adequate space on mobile must be provided for all food preparation.	<input type="checkbox"/> Adequate space on mobile must be provided for all food preparation not completed in commissary.	Food must be protected from sources of contamination during preparation.
Raw Meat Prep/Cutting Onboard	<input type="checkbox"/> 20-pound grease trap installed. <input type="checkbox"/> Requires additional water capacity for an additional cycle of the 3-compartment sink.	<input type="checkbox"/> 20-pound grease trap installed. <input type="checkbox"/> Requires additional water capacity for an additional cycle of the 3-compartment sink.	Additional meat prep generates fats and greases that can solidify in the water lines and must be removed prior to wastewater disposal. All equipment used for raw meat must be washed, rinsed and sanitized after use.