

Mobile Food Service, Part 1
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Questions and Answers

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Below you will find the summary of the questions and answers (Q & A) from the live Webinar Series. For clarity and brevity, the live session of Q & A was trimmed from the original recording. Please keep in mind that this document is meant as a job aide. It does not create or confer any right for or on any person and does not operate to bind federal, state, or local food safety regulatory agencies. If you have questions concerning interpretation or application of various portions, please reach out to your District Supervisor for assistance. A current District Map is posted at the top of the page where you found the recording and Q & A document.

Q: Is servicing area the same as a commissary?

- The servicing area doesn't have to necessarily be a commissary, but it can be.
- Commissary is typically used by multiple businesses; servicing area may not have to be inspected.
- A service area can be a storage building that holds food supplies – if all supplies can be held on the truck or mobile unit there isn't a need for a servicing area.
- Mobile units can use a shared kitchen; however, it will still need to be inspected.
- A servicing area could just be the place they dispose of waste and refill potable water tanks.
- To confirm they are disposing waste and refilling potable water tanks in appropriate areas/sources if they do not have a service area, they will have to submit an SOP (standard operating procedure) form.

Q: Can they use their house as a servicing area?

- Some people have converted a garage or separate building that is not mixed with private supplies.
- The Missouri Food Code states, "6-202.111 Private Homes and Living or Sleeping Quarters, Use Prohibition. A private home, a room used as living or sleeping quarters, or an area directly opening into a room used as living or sleeping quarters may not be used for conducting food establishment operations."
 - For example, they cannot use their private kitchen to prepare ingredients, ware washing or store supplies.

Q: If there isn't a service area required, how can you make sure they're doing that correctly?

- If wash, rinse, sanitize sinks are on the mobile unit, you will inspect on mobile unit. If they conduct any aspect of food preparation, clean-up, or storage outside of the mobile unit, you will need to go that location to inspect. This should be documented in their standard operating procedures as to where this process takes place.

- If all the mobile food establishments operations take place of the mobile unit, you will need to have that documented in the establishment file.

Q: Does a food truck that only makes non-potentially hazardous food such as kettle corn, cotton candy or sno-cones need to be licensed?

- Yes, if the product meets the definition of a food establishment. See Missouri Food Code for definition.
- For sno-cones, the establishment will need to make sure ice is from a potable water source. This would be considered a low priority inspection if the only food items sold were sno-cones.
- It is recommended to ask about all menu items that will be sold and understand how they are made. For example, sno-cones are predominately made with shaved ice and syrup flavoring. There are sno-cones with cream. They are made with shaved ice, milk/sugar mixture and syrup flavoring.

Q: Who determines what is "adequate" sizing for a potable water tank for the mobile unit? Is that subjective to the inspector or is there guidance provided similar to what we have for OWTs systems?

- You want proof of NSF/approved potable water tank. It should have documentation or a label to prove that is an approved tank.
- An adequate size will depend on the foods they're retailing. Many manufacturers are recommending a 40-gallon freshwater tank as being fine to operate a mobile food unit.
- For the potable water that will be needed each day, it is important to know the menu items and the operations of the mobile unit. For example, how much water is needed to prepare the food on the menu? If the water is needed for washing of produce, boiling water pots and ware washing more water will need to be available for food preparation. Another consideration will be the number of customers that are served during the day. The greater the volume of customers, the greater the volume of water usage. The number of employees need to be considered in the volume of water usage due to frequent hand washing. The duration of time that the mobile food unit is in operation between servicing will need to be considered as well. For a larger mobile operation with a complex food menu, tanks the size of 100-gallons or greater may be needed.
- If the mobile unit has a servicing area that they prepare and cook foods and their mobile unit is mostly used for hot holding while they go out to serve, the mobile unit will not need as much water as a mobile unit preparing/washing vegetables on the mobile unit.
- If their fresh water supply capacity will not last for all day service, the mobile unit will need to prepare to dispose of wastewater and refill with freshwater during a slow time of the day.

Q: What if a mobile trailer unit basically becomes a permanent establishment of sorts by tying into city water and sewer and drags in a large metal storage unit out back for all their stuff but still works off the "mobile" unit? Any different inspection needs?

- If they are tied into permanent utilities (like sewer) it would not be considered mobile anymore. That would just be using the structure as their business.
- This can be classified as a fixed unit and would also depend on how local food ordinances define a mobile unit.

Q: How long can it sit in one place and still be mobile?

- Local ordinances will dictate this.

Q: What about the PEX hose handling freezing conditions?

- Cross-linked polyethylene (PEX) hose handles freezing conditions well. Manufacture recommendation is that when the outside temperatures are 20-degrees F or below, the PEX hose should be held in a 55-degree F environment to keep from being damaged.
- Because PEX is flexible, it can handle freezing and thawing without cracking.
- These degrade over time and will depend on the environment they're used in. PEX pipe can be damaged if exposed overtime to sunlight.

Q: Is it required to inspect based on risk level? We currently treat all our mobile units as the same with one annual inspection.

- They're no different than any other food establishment. The majority will need to be inspected more than one time per year. Your risk assessment form should determine how often the mobile food establishment should be inspected (should fit into a medium or high priority).
- Some counties will have the mobile food establishment come to the health department to be inspected for the pre-opening inspections.
- Pre-opening is fine at the local health department, but you do not see their procedures or employees' actions, hot and cold holding, etc. All other inspections should be where the mobile food establishment is operating for business and where they may be preparing/storing food and supplies.
- Use social media and websites to find the mobile food establishments schedule and do an unannounced inspection.

Useful links:

<https://www.foodprotect.org/guides-documents/recommended-guidance-for-mobile-food-establishments/>

<https://health.mo.gov/safety/foodsafety/industryfoods/retailfoods/appsforms.php>

<https://health.mo.gov/atoz/ehog/>

