Guideline: Mobile Food Services

Issue Date: March 19, 2024
Revision: N/A

Applies to: Any persons making a request to operate a mobile food service on University of Michigan owned property on the Ann Arbor, Dearborn, Flint, and Michigan Medicine campuses.

Summary

To accommodate requests for mobile food service operations on University of Michigan campuses. Only mobile food service vendors that have been inspected by University of Michigan Environment, Health, & Safety (EHS) Fire Safety Services (FSS) and a County Health Department or their designee are authorized to operate on University of Michigan campuses.

Failure to follow this guideline may result in the immediate closure and removal of the mobile food service vendor from University of Michigan property until the Owner / Operator secures a permit. University of Michigan Department of Public Safety and Security agencies are available to assist, if needed.

There are no service fees charged for these inspections conducted by EHS FSS and Food Safety. Service fees may be involved from respective County Health Departments.

Vendors that desire to operate more than one food mobile food service vehicle on University of Michigan property shall have each food mobile food service vehicle complete this inspection process. Issued permits must be clearly displayed within the immediate area of the sales counter on the assigned vehicle. EHS reserves the right to conduct additional inspections at any time for any reason.

Scope

This Guideline addresses mobile food service operations on all University of Michigan properties. The EHS FSS inspection program addresses items that are related to fire safety measures that are not addressed by any County Health Department.

A minimum 7-business day notification prior to the scheduled event is required for EHS FSS to schedule the respective mobile food service fire safety inspection. EHS FSS mobile food service inspections will be conducted Monday through Friday from 7AM to 3PM at the Ann Arbor campus, unless previously arranged by EHS FSS. Inspection locations for Dearborn and Flint will be coordinated with the respective EHS campus directors.
Additional inspection services will be conducted on the Ann Arbor campus, while at the discretion and availability of the assigned fire inspector, additional on-site inspections are possible. EHS FSS encourages all prospective vendors to self-inspect their vehicle(s) with the attached informational material prior to the scheduled inspection.

Based on the 6-month permit schedule, EHS will schedule one day in December and June to be on the campuses of Dearborn and Flint to conduct mobile food service inspections.

Fire Inspector Ira Harrison (irac@umich.edu) is the mobile food service coordinator for EHS FSS. As part of Fire Inspector Harrison’s responsibilities as the mobile food service coordinator are to establish and maintain a vendor database that can be shared within the EHS community.

Upon completion of the EHS FSS inspection, respective County Health Departments or their designees shall complete a food safety inspection of each mobile food service vehicle. Vendors operating on the Ann Arbor campus will be inspected by EHS Food Safety, while mobile food service vendors operating on the Flint and Dearborn campuses are individually responsible to schedule and complete food safety inspections with the Genesee and Wayne County Health Departments, respectively.

Permits are available in pre-determined 6-month durations (January-June or July-January) or an annual permit if there is no cooking equipment on the vehicle. Warming equipment is recognized as cooking equipment.

EHS FSS requires all mobile food service vehicles / apparatus to be thoroughly cleaned prior to the scheduled inspection. EHS FSS possesses the right to reschedule an inspection, if an EHS fire inspector determines the mobile food service vehicles / apparatus is not clean.

Procedure

1. Any person(s) wishing to operate a mobile food service operation on University of Michigan property must follow the procedures as outlined below.
   a. Ann Arbor Campus Events
      - A special event request form [http://fo.umich.edu/outdoor_events/index.php](http://fo.umich.edu/outdoor_events/index.php) must be filled out and submitted for review and approval. If you have any questions, please contact University of Michigan Facilities and Operations Special Events Office at 734-615-9075 and/or [fo-events@umich.edu](mailto:fo-events@umich.edu)
   b. Dearborn Campus Events
      - All event requests for the University of Michigan Dearborn campus are managed by [University Unions and Events](http://fo.umich.edu/outdoor_events/index.php). Questions can be directed to (313) 583-6330.
   c. Flint Campus Events
      - All event requests for the University of Michigan Flint campus are managed by [Conferences & Events](http://fo.umich.edu/outdoor_events/index.php). Office located at 172 Harding Mott University Center. Questions can be directed to (810) 762-3436.
2. Regardless of campus location, mobile food vendors shall complete and submit the Food Truck Safety Application at least 7-business days in advance of the event date.

3. After submitting the Food Truck Safety Application Form, a representative from the EHS FSS will contact the mobile food service vendor to schedule an inspection.

4. After approval from EHS FSS, the Special Transitory Food Unit (STFU) or Mobile Food Establishment (MFE) licensed food truck operator will need to fill out and submit the Notification of Intent to Operate at least 7-business days prior to each event.

5. All STFU or MFE licensed food truck operators must follow and be in compliance with the respective local and state health department requirements, including but not limited with being up to date on required inspections and postings, training, other food preparedness and food safety requirements.
FOOD TRUCK SAFETY

General Safety Checklist

- Obtain license or permits from the local authorities. [1:13.8] G1
- Ensure there is no public seating within the mobile food truck. [1:50.8.3.2] G2
- Check that there is a clearance of at least 10 ft away from buildings, structures, vehicles, and any combustible materials or as prescribed by the AHJ. [96:17.2] G3
- Verify fire department vehicular access is provided for fire lanes and access roads. [1:18.2.4] G4
- Ensure clearance is provided for the fire department to access fire hydrants and access fire department connections. [1:13.1.4; 1:13.1.5] G5
- Check that appliances that produce grease-laden vapors and that might be a source of grease in the hood, grease removal device, or duct are protected by fire-extinguishing equipment. [96:10.1.2] G6
- Verify portable fire extinguishers have been selected and installed in kitchen cooking areas in accordance with NFPA 10. [96:10.9] G7a
- Where cooking appliances that use solid fuel, such as charcoal or wood, produce grease-laden vapors, make sure the appliances are protected by listed fire-extinguishing equipment. [96:15.7.1] G7b
- Ensure that workers are trained in the following: [96:17.11] G8
  - Proper use of portable fire extinguishers and extinguishing systems [96:17.11.1(1)] G8a
  - Proper method of shutting off fuel sources [96:17.11.1(2)] G8b
  - Proper procedure for notifying the local fire department [96:17.11.1(3)] G8c
  - Proper procedure for how to perform simple leak test on LP-Gas connections [96:17.11.1(5)] G8d

NFPA code references are provided at the end of each item. The red keys correspond to the NFPA food truck safety diagram. For more detailed information, see NFPA 1, Chapter 17 in NFPA 96, and Chapter 16 in NFPA 58.
Food Truck Safety

Fuel & Power Sources Checklist
- Verify that fuel tanks are filled to the capacity needed for uninterrupted operation during normal operating hours. [1:10.14.11.1 for carnivals only] F1a
- Ensure that refueling is conducted only during non-operating hours. [96:17.8.3] [1:10.14.11.2 for carnivals only] F1b
- Check that any engine-driven source of power is separated from the public by barriers, such as physical guards, fencing, or enclosures. [96:17.6.2.2] F2
- Ensure that any engine-driven source of power is shut down prior to refueling from a portable container. [1:10.15.4] F3
- Check that surfaces of engine-driven source of power are cool to the touch prior to refueling from a portable container. F3a
- Make sure that exhaust from engine-driven source of power complies with the following: F4
  - At least 12 ft in all directions from openings, air intakes, and means of egress. [96:17.6.2.3(1)] F4a
  - Directed away from all buildings. [96:17.6.2.3(2)] F4b
  - Directed away from any mobile or temporary cooking operations. [96:17.6.2.3(3)] F4c
- Ensure that all electrical appliances, fixtures, equipment, and wiring complies with the NFPA 70®. [96:17.9.1] F5

Propane System Integrity Checklist
- The main shutoff valves on a container for liquid and vapor are either accessible without the use of tools, or other equipment is provided to shut off the container valve. [58:16.3.4] P1
- Ensure that during cooking operations at least one person is trained in emergency response procedures and knows how to shut off fuel sources, change out LP-Gas containers, and the properties of LP-Gas. [58:16.8.1] P2
- Visually inspect LP-Gas systems daily for damage and proper operation prior to each use. [96:17.8.2.3] P3
- Perform pressure testing on all new or modified piping systems. [58:16.6.10] P4
- Perform leak testing on cylinder connections with a noncorrosive leak-detecting fluid or other approved leak detection method each time a cylinder(s) is replaced. [58:16.11.5] P5
- Document leak testing and keep documentation in the mobile food facility. [58:16.11.3, 16.11.3.1] P6
- Ensure that on gas system piping, a flexible connector is installed between the regulator outlet and the fixed piping system. [58:16.6.8.1] P7
- Where a gas detection system is installed, ensure that it is tested monthly. [96:17.8.2.2] P8

Operational Safety Checklist
- Do not leave cooking equipment unattended while it is still hot. (This is the leading cause of home structure fires and home fire injuries.) OA
- Operate cooking equipment only when exhaust systems are on. [96:12.1.1] OB
- Close LP-Gas container valves when system is not in use. [58:6.26.3.3] OC
- Keep cooking equipment, including the cooking ventilation system, clean by regularly removing grease. [96:12.4] OD

Solid Fuel Safety Checklist (Where Wood, Charcoal, Or Other Solid Fuel Is Used)
- Fuel is not stored above any heat-producing appliance or vent. [96:15.9.2.2] SA
- Fuel is not stored closer than 3 ft to any cooking appliance. [96:15.9.2.2] SB
- Fuel is not stored near any combustible flammable liquids, ignition sources, chemicals, and food supplies and packaged goods. [96:15.9.2.7] SC
- Fuel is not stored in the path of the ash removal or near removed ashes. [96:15.9.2.4] SD
- Ash, cinders, and other fire debris should be removed from the firebox at regular intervals and at least once a day. [96:15.9.3.6.1, 15.9.3.6.2] SE
- Removed ashes, cinders, and other removed fire debris should be placed in a closed, metal container. [96:15.9.3.8.1] SF

Learn More
- Get free digital access to NFPA codes and standards at: nfpa.org/docinfo
- Read the latest news and updates at: nfpa.org/foodtrucksafety
- Review the following and other NFPA resources at: nfpa.org
  - NFPA 1, Fire Code, 2024 Edition
  - NFPA 10, Standard for Portable Fire Extinguishers, 2022 Edition
  - NFPA 70®, National Electrical Code®, 2023 Edition

NOTE: This information is provided to help advance safety of mobile and temporary cooking operations. It is not intended to be a comprehensive list of requirements for mobile and temporary cooking operations. Check with the local jurisdiction for specific requirements. This safety sheet does not represent the official position of the NFPA or its Technical Committees. The NFPA disclaims liability for any personal injury, property, or other damages of any nature whatsoever resulting from the use of this information. For more information, go to nfpa.org/foodtrucksafety.

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Propane cylinders have identifying marks on the cylinder neckring (collar), or cylinder shoulder depending on the cylinder type. The diagram below depicts examples of several of the required markings.

**Requalification/Retesting (49 CFR § 180.205)**

The "requalification" date, also known as the "retest" date, is an important marking for fillers and/or consumers. Propane cylinders must be requalified or replaced every 5-12 years depending on the cylinder type, condition, and previous requalification method. (Ref. 49 CFR § 180.205(d) and 180.209)

The original manufacture/test date and any requalification/retest date(s) must be presented in a specific manner, reviewed, and determined to be within test prior to filling.

**Visual Cylinder Inspection**

In accordance with 49 CFR § 173.301(a)(2), cylinders must undergo a visual inspection prior to being filled. If any of the defects noted in items 1 through 4 below are present, the cylinder must not be filled and may only be repaired, requalified, or rebuilt by an authorized U.S. DOT facility (see authorized RIN and VIN holders below):

1. Damage to the cylinder's exterior including dents; bulges; cuts; or cracks on the cylinder's surface, or to welds; and any evidence of physical abuse; fire; or heat damage.
2. Detrimental rust, corrosion, or pitting on the cylinder, particularly on the bottom.
3. Absence of/damage to a cylinder footring, cylinder neckring (collar), or valve cover.
4. A leaking or defective valve or leaking or defective pressure relief device.

A cylinder conforming to the Visual Inspection criteria also must be examined for the most recent repair, requalification, or rebuild date prior to filling. Cylinders that are overdue for requalification must NOT be refilled.

- DOT 4-series propane cylinders must be requalified 12 years following their manufacture date and every 5, 7, or 12 years thereafter depending on how the last requalification, if any, was completed.
  - If no requalification date is present, 12 years from the date of manufacture.
  - If requalification was completed by the "Volumetric Expansion" method, as indicated by a valid RIN holder's requalification mark, 12 years after that date.
  - If requalification was completed by the "Proof-Pressure" method, as indicated by a valid RIN holder's requalification mark followed by an "S" 7-years after that date.
  - If requalification was completed by the "External Visual" method, as indicated by a valid VIN or VIN holder's requalification mark followed by an "E" 5-years after that date.

**Sample Requalification Marks (49 CFR § 180.213)**

- **01 A 1 3 2 07**
  - An approved RIN holder's marking "A123" certifying a 12-year Volumetric Expansion test conducted in January 2007

- **01 A 1 3 2 07 "X"**
  - The same RIN holder's marking where "X" represents the symbol of the testing method used for requalification: "E": 5-Year External Visual Method; "S": 7-Year Proof-Pressure Method

- **V123456 0107 E**
  - An External Visual marking for an approved VIN holder denoting the 5-Year External Visual method conducted in January 2007 (Ref. VIN Approval Letter)

**NOTE:** Requalification Marks may only be applied by valid U.S. DOT RIN (Requalifier Identification Number) or VIN (Visual Identification Number) holders!

Authorized RIN and VIN holders are listed: http://phmsa.dot.gov/hazmat/req/sp-a/approvals/cylinders