

Cal Code Tutorial

A simplified guide to the new California Retail Food Code.

Introduction to the New California "Cal Code" Laws for Mobile Food Facilities.

The state of California recently changed the rules governing hot dog carts in that state. The new rules are under the California Retail Food Code (CRFC) or Cal Code for short. They came into effect on July 1, 2007. These new laws are much more stringent and restrictive than the previous code (the former California Uniform Retail Food Facilities law or CURFFL). Under the new Cal Code, equipment and procedures that were previously acceptable for many years are now longer allowed.

In addition to having the design of the cart and its equipment approved by the state and county health departments, the operator of the cart must also use the equipment in a manner that meets the approval of the California Retail Food Code. The cart operator must store, prepare and serve food in a way that meets with health department approval. This is the focus of the bulk of the information in this guide.

The Cal Code document itself uses legal language that is often difficult to understand. It also applies to all kinds of different food facilities besides hot dog carts. We have prepared this manual as a plain language summary of the Cal Code as it applies specifically to hot dog carts, their use and operation in California.

All new hot dog carts in California must meet the new codes. All old carts that are sold to a new owner must be upgraded to meet the new codes. Due to the extensive changes to the Retail Food Laws, updating an old cart would likely be very expensive and may even be physically impossible.

Hot dog carts come under the definition of a "Mobile Food Facility" in the new Cal Code. The Cal Code specifies both the design requirements for a hot dog cart as well as the training requirements for the owner / operator and the operating procedures for running such a cart.

Certification and Training Requirements for Hot Dog Cart Operators.

All hot dog cart owners must have a permit from the local County Health Department to operate the cart. The permit holder is legally responsible for the correct healthy operation of the hot dog cart. This means that the cart owner must ensure that any other employees are fully trained regarding food safety procedures. Each employee must be able to demonstrate their knowledge of food safety as it relates to their job to the health inspector. The holder of the health permit must designate one person to be the "Person in Charge" of the hot dog cart when they are not themselves present. In most cases though, the hot dog cart owner is also the sole operator of a cart.

If the cart owner has a number of employees operating one or more carts, then there are special training requirements. At least one person for each Food Facility, the owner or an employee, must have passed an approved Food Safety Certification Exam. This certified person must train all other employees regarding personal hygiene, food safety, and healthy hot dog cart operational procedures. This person does not, however, have to be present at all times during the operation of the hot dog cart. This certification must be renewed every 5 years. A copy of the certificate must be kept on hand to be available for inspection by the health department inspector. If the certified person leaves the company, or if the hot dog cart changes ownership, the permit holder has 60 days to hire or train a new certified person. If the cart owner is the sole operator of the cart, then he is required to have passed the Food Safety Certification Exam.

Food safety training courses are often hosted by non-governmental food companies. These courses may cost several hundred dollars and last a few days. The county health department usually has a list of approved companies hosting such courses that you can contact for courses prices and a schedule.

The certification course will include training regarding:

- foodborne illnesses
- micro-organisms
- contamination and toxins
- the terminology used regarding contamination, disease and toxins
- methods to prevent cross contamination
- methods for good facility housekeeping and maintenance
- the relationship between food temperature and time with respect to the growth of micro-organisms
- use of thermometers and methods of temperature control
- the relationship between personal hygiene and food safety
- how proper procedures contribute to improved food safety
- methods of preventing food contamination
- procedures for cleaning and sanitizing utensils and equipment

The certification course exam will not cost more than \$60.00 and no city or county government agency can require additional certifications above and beyond the one approved by state of California.

Operational Guidelines

Each new cart must have its design approved by the local county health department. In addition to this, the health department requires that the owner / operator be trained in food safety. The cart must then be operated under strict guidelines as a mobile food facility.

A hot dog cart in California must be based out of an approved Commissary. A Commissary is a food establishment such as a restaurant, market, or deli that has a Food Facility permit. The Commissary provides an approved place for safe and healthy food preparation and storage. It also provides a place to store utensils, containers and other supplies. It is where the cart is loaded with food and water and is later emptied of liquid and solid wastes. A private home is not allowed to function as a commissary.

The local health department often has a list of approved commissaries posted on their web site.

The county health department will want to see and keep a record of the official signed agreement between the hot dog cart operator and the commissary. The county health department usually have a blank copy of a commissary agreement on their website that the cart operator will fill out and return to the health officials.

The county health department will want to see and keep a record of the hot dog cart operational procedures. This procedures form details to the health department such things as what foods you will be serving from your hot dog cart (your menu), where you buy your food supplies, where you fill your water tanks, and what method of food preparation (ie reheating hot dogs) you will be using.

Again, the local health department will likely have a blank copy of the operation procedures form listed on their website that can be easily printed off and filled out.

Each day the cart will be cleaned, prepared and loaded with food and water at the commissary, and then towed to its vending location. At the conclusion of the day's business, the cart must be returned to the commissary for emptying of food and waste, cleaning, and overnight storage.

Hot Dog Cart Design Guidelines

The Cal Code specifies the design requirements of a hot dog cart so as to ensure that it can safely prepare food for the public at a remote location. The Cal Code specifies design details including the type of equipment used for storing and preparing food, the necessary equipment approvals, the materials that can be used in construction, what equipment must be included on the cart, the layout of the equipment, and so on.

Our hot dog carts are designed in such a way so that they meet the California Retail Food Code guidelines for Mobile Food Facilities such as hot dog carts. They have all the necessary equipment and are laid out to meet health department standards.

Each cart design must be submitted to the local county health department for design approval. Then each cart must be physically inspected by a county health department inspector for conformance to the California Retail Food Code and the design submitted.

Our website enables you to print off our design and the equipment specification details

so that you can easily submit this to your local health department.

The Cal Code also requires that each hot dog cart has the business name or name of the cart operator displayed on the side of the cart in letters that are at least 3" high. Also displayed in 1" high lettering should be the city, state, Zip code and name of the permit holder.

Employee Health Guidelines

These guidelines are designed to prevent a food service employee such as a hot dog cart operator from passing on an illness through food contact.

A county health inspector can close down a hot dog cart or stop a cart operator or employee from serving or preparing food or working with food equipment and utensils including cleaning if they determine that such a person or the equipment being used is in danger of causing or passing on a food borne illness.

The person in charge must notify the Local Health Department if a food service employee is diagnosed with Salmonella, Shigella, Entamoeba Histolytica, Enterohemorrhagic or Shiga toxin producing E-coli, Hepatitis A, Norovirus, or any other diseases transmissible through food. The person in charge must notify the Local Health Department if 2 or more employees are experiencing acute gastrointestinal illness at the same time. A county health inspector can close down a hot dog cart or stop a cart operator or employee from serving or preparing food or using food equipment including cleaning if they determine that a person with these conditions or symptoms is still infectious and a danger to the public. The person in charge of the hot dog cart should prevent any such infected employees from working with food or food equipment or even entering a food facility.

Hand Washing

All hot dog carts must have a dedicated hand washing facility (water faucet and sink) available to employees at all times that provides pressurized warm water through a mixing valve or combination faucet for at least 15 seconds. The hand washing sink must not be located immediately next to the food preparation area.

The hand washing sink, if it is located immediately beside the ware washing (dish and utensil washing and sanitizing) sinks or drain boards, it must have a metal splashguard at least 6 inches high with rounded corners. This splashguard must extend from the front edge to the back edge of the drain board. No splashguard is required if the distance between the hand washing sink and the ware washing sink drain boards is more than 24 inches.

The hand washing sink must only be used for hand washing and no other purpose. The food preparation and ware washing sinks must not be used for hand washing. The hand washing facility must be kept clean. The hand washing facility must be provided with a dispenser for hand washing soap and a dispenser for sanitary single use towels.

Employees must thoroughly wash their hands and any portion of their arms that are exposed to direct food contact. They must always wash with soap and warm water for 10 - 15 seconds by vigorously lathering and rubbing their hands together and including the necessary area of their arms. They must then rinse these areas with clean running water and dry these areas using a sanitary single use towel. Special care must be taken to thoroughly clean underneath finger nails and between the fingers.

Hands must be washed in all of the following instances:

- Immediately before preparing food, cleaning equipment and utensils, and unwrapping single use food containers and utensils.
- After touching bare body parts other than clean hands and clean portions of the arms.
- After using the toilet.
- After touching or caring for any animal.
- After coughing, sneezing, using a handkerchief or disposable tissue (kleenex)
- After using tobacco, eating or drinking.
- After handling soiled equipment or utensils.
- As often as necessary to remove contamination during the food preparation process or to prevent cross contamination.
- When changing from working with raw or uncooked food to working with cooked or ready-to-eat food.
- Before putting on gloves to work with food.
- Before dispensing or serving food or handling clean food utensils or tableware.
- After handling trash or a trash container.
- After engaging in any activity that would contaminate the hands.

Hand sanitizing solutions must only be used after washing hands as prescribed above. Hand sanitizing agents must be FDA approved, have anti-microbial ingredients, and be safe for use with food. If the sanitizer does not meet these requirements, the hands should be thoroughly rinsed in clean running water after using the sanitizing agent. If the sanitizing agent is being used as a hand dip solution, it must be kept clean and have a strength of at least 100mg Chlorine per Liter.

A sign must be clearly posted to notify food service employees to wash their hands.

Food service employees must keep to a minimum the contact between their bare hands or arms and any non-prepackaged food. They should use clean utensils including tongs, forks, gloves, paper wrappers and any other necessary implements in order to do this. Any utensils that handle food after it has been served to a customer must be washed and sanitized before being used again.

Personal Cleanliness

No employee should do anything that may result in the contamination of food, food contact surfaces, equipment or utensils.

Food service workers must keep their fingernails trimmed and smooth so that they are easily cleaned and will not hold contamination.

All hot dog cart food service workers must wear hair restraints such as hats, hair coverings, or hair nets, that are designed to prevent hair from falling into food or onto food equipment, utensils, linens, or unwrapped single use items.

Food service workers must wear clean outer clothing to prevent contamination of food, food equipment, utensils, linens and unwrapped single use items.

Gloves should be worn if an employee has any cuts, sores, rashes, artificial nails, nail polish, rings, uncleanable orthopedic support devices, or unclean finger nails. Gloves should be changed, replaced or washed as often as hand washing is required as outlined above. Single use gloves must only be used for one task and then discarded. If a task is interrupted or if the gloves become soiled, damaged or contaminated, single use gloves must be discarded.

No food service employee shall work with food, clean equipment, utensils or linens, if experiencing persistent sneezing, coughing, or runny nose, having discharges from the eyes, nose or mouth.

A utensil used to test food must not be used more than once. It must be washed and sanitized before re-use.

A food employee can not eat, drink or smoke in the food preparation or serving area, or where such activities may contaminate food or food equipment. Eating, drinking, and smoking must be done away from the hot dog cart. Hands must be washed upon returning to the cart. Drinking at the cart may be done if it is done from a closed beverage container and in a way that prevents the employee's hands, as well as the food, food preparation areas and equipment, from being contaminated.

A food service worker should not handle animals such as pets when working with food. If an animal is touched, the person must wash their hands before handling food or equipment again.

The hot dog cart must be located within 200 feet of a toilet facility with hand washing facilities that is available for use to the cart operators.

A no smoking sign must be posted on the cart.

Food Safety Requirements.

Food must always be handled, transported, stored, prepared, cooked, held, and served in a way that is free from spoilage and contamination. This includes protecting

the food, food preparation surfaces, food equipment and utensils, from dirt, vermin (including insects, mice, rats, birds, etc), droplets (including rain and spray), overhead leakage (such as from thawing meat), chemical contamination (such as from cleaning agents and pesticides), and unnecessary handling.

Food must be protected from cross contamination during storage, handling and preparation. Cross contamination can occur when a food ready to serve touches a food or food surface that has touched raw or uncooked food or any other contaminated substance.

To prevent cross contamination different types of food must be kept separate when storing, transporting, preparing and holding.

Meat, especially, must be kept separate from other food types as it is considered a potentially hazardous food because it can support rapidly growing bacteria that harm human consumers. Raw meat should be kept only on shelves underneath other foods so that it does not drip on and contaminate the other foods. Food preparation utensils and surfaces must be washed and sanitized after being used to prepare raw meats.

Uncooked vegetables and fruits can also carry contamination such as bacteria or pesticides. Therefore any food surfaces or utensils used in preparing uncooked vegetables must also be washed and sanitized before being used to prepare other foods.

Fruits and vegetables should be washed in clean potable water before being cut, peeled, chopped, served or combined with other foods.

Food containers can become contaminated if exposed to external contamination such as meat drippings, dirt, or chemicals. Therefore, any container containing food that becomes pierced or punctured should be discarded. A container that has become dirty on its exterior should be washed before opening to prevent cross contamination.

The food displays and entire food storage and preparation areas must be protected from overhead contamination such as bird droppings, dust, rain and leaves, by the use of a canopy or umbrella. The operator should periodically check these areas to ensure that they are clean and no contamination has occurred.

Condiments must be protected from contamination by being kept in containers with self closing lids, dispensing units such as pumps or squeeze bottles, or supplied in individual serving packages. Screw top jars are not acceptable for condiments on a hot dog stand. The condiment containers and utensils must be checked regularly to ensure that they are clean and free from contamination.

Any tableware such as take away plastic spoons, knives or forks to be used by the customer must be either wrapped or presented so that only the handles are touched by the food stand operator or the consumer.

Spoiled, recalled or damaged food must be stored separately from uncontaminated foods.

Ice used to cool foods such as canned sodas in an ice box must not be used as an ingredient in foods such as in a cold drink.

All food must be supplied only from approved sources that conform to safe food handling practices. Food may not be prepared in a private home. Always load your cart at the approved commissary. Only prepare and sell approved foods that you have listed in your operations procedures on record with the health department.

Liquid wastes such as waste water may not be drained from the hot dog cart onto the street or sidewalk. The cart should be only loaded with potable water at the commissary. At the end of the day, it should only be drained of waste water at the commissary.

Food must be reheated and maintained at the proper holding temperatures using approved methods.

Potentially hazardous foods such as hot dog meat must be stored continually at under 41 degrees F. The Cal Code requires meat to be stored on a cart only using an electric NSF approved refrigerator. Ice chests are not to be used to store potentially hazardous foods such as meat. A thermometer must be on hand dedicated only to monitoring the cold holding temperature of the meat.

Hot dog sausages or wieners must first be reheated so that all parts of the food reach at least 165 degrees F for at least 15 seconds before being served to a customer. This temperature must be done rapidly to prevent bacterial growth. The time between the food being reheated from 41 degrees F to 165 degrees F must not exceed 2 hours. A food probe thermometer must be on hand to verify that the meat had achieved this reheating temperature.

Once reheated for serving and having achieved the correct temperature, potentially hazardous foods such as hot dog wieners must be kept at a holding temperature of at least 135 degrees F or above. Any left over hot food must be destroyed and disposed of at the end of the day. A thermometer must be on hand for the express purpose of monitoring the hot holding temperature.

Food Thermometers must be on hand for checking the temperature of hot and cold foods and verifying the temperatures achieved by the refrigeration and heating equipment. These thermometers must only be scaled in degrees Fahrenheit and should be accurate to +/-2 degrees F. These thermometers must not have sensors or stems made from glass unless these are encased in a shatterproof coating.

Any coffee, cocoa, or other beverage containing a dairy product such as milk or cream must only be made to order and served to the customer immediately. Dairy products are considered to be potentially hazardous foods as they can easily support rapidly

growing bacteria that would harm human consumers.

If potentially hazardous foods are to be transported from the commissary to the hot dog cart by use of a Mobile Support Unit, these foods must be kept at a holding temperature of above 135 degrees F or below 41 degrees F if the transportation time will last longer than 30 minutes. Only a health department approved Mobile Support Unit should be used to transport foods and supplies from the commissary to the hot dog cart.

Potentially hazardous foods such as meats can only be thawed using approved methods and within a certain time period. Such foods can be thawed in a refrigerator at 41 degrees F or below, submerged in running water that is 70 degrees F or below and is accomplished in less than 2 hours, in a microwave oven if the food is to be cooked immediately, or thawed in part of the cooking process.

Food should be inspected upon receipt to ensure that it is from an approved source, is properly packaged, is not contaminated in any way and is in good wholesome condition. Frozen potentially hazardous foods such as meats should be received at a temperature of 45 degrees F or below and should then be cooled to less than 41 degrees F within 4 hours or cooked. Potentially hazardous foods that are received hot should be received at a temperature of at least 135 degrees F or more.

Foods should not be stored in areas where they may be subjected to contamination. Prohibited food storage areas include toilet rooms, locker rooms, garbage rooms, mechanical rooms, under open stairwells, under leaking water lines or under sewage lines that are not protected from drips.

Prepackaged food must not be stored in ice or water if the water can enter the food through the packaging or container.

Any poisonous or toxic chemicals such as cleaning fluids must be transported, stored and used in a way that prevents them from contaminating food, utensils, equipment, linens and single use items such as paper towels or plastic cutlery.

Water Requirements and Safe Usage

Hot dog carts are required to have a supply of fresh potable hot and cold water on board. This water supply must be pressurized and the hot water must be at least 120 degrees F when it comes out the faucet. A thermometer must be on hand to verify that this temperature is being achieved. The carts are designed to have the required volume of fresh water tanks as well as waste water tanks on board.

The fresh water supply tanks should only be filled at the commissary. The filling process must be done in a way that makes sure the water remains uncontaminated and no dirt or insects enter the storage tanks.

The waste water tanks, steamer tables, ice bins, and refrigerators should be drained

of waste water at the end of the work day and only back at the commissary. They should be drained into approved waste drains such as a floor sink. They must never be drained onto the street or down a street sewer drain as this is a health code violation.

Equipment Cleaning and Sanitizing

The cart must be equipped with 3 ware washing sinks and a separate hand washing sink. These facilities must be kept clean. The hand washing sink must only be used for washing hands and the ware washing sinks must only be used for washing and sanitizing dishes and utensils. A sanitizing solution should be kept on hand in the cart to be used for the proper sanitizing of the dishes and utensils. This solution can be made with chlorine bleach and water at a level of 100 ppm. This is made by adding 1 teaspoon (5mL) of chlorine bleach to 1 quart (1L) of water. The hot water must be checked with a thermometer to make sure it is a least 120 degrees F.

Utensils and equipment should be air dried and stored inverted in a place or container that allows self draining and air drying and is clean and protected from dust, splashes and other forms of contamination.

Food should only ever come into contact with utensils and surfaces that have been cleaned and sanitized.

Food preparation surfaces, equipment, and utensils must be cleaned before each use of a different type of raw meat, after changing from working with raw meats or vegetables and ready to eat or cooked food, after and before using any potentially hazardous foods, and after any time where contamination may have occurred.

Condiment containers should be emptied and cleaned before restocking or refilling.

Utensils such as tongs should only be stored between uses in a clean container or on a clean surface.

The ware washing and hand washing sinks must never be used to clean maintenance tools, hold such tools, or to dispose of mop water or other such liquid wastes.

Wiping cloths that are used to clean up food spills should only be used for that purpose and not for any other purpose. If such cloths are to be used repeatedly, they must be held in a sanitizing solution between uses. These cloths should be free of food debris and not visibly dirty. Any wiping cloths used to clean up raw uncooked meats or meat drippings should not be used for any other purpose and should be kept in a separate sanitizing solution from general purpose wiping cloths. The sanitizing storage containers for these wiping cloths should be made and used so that they do not contaminate other equipment, utensils, food, or linens.

Clean linens must be free of food residue and other matter and should look clean. Soiled dirty linens should be kept separately in clean, non-absorbent containers and must be stored and transported so that they do not contaminate other equipment,

utensils, food or linens.

All clean utensils, linens and single use articles such as paper towels and cutlery must be stored in a clean dry place protected from dust, splashing, or other contamination. Prohibited storage areas include toilet rooms, locker rooms, garbage rooms, mechanical rooms, under open stairwells, under leaking water lines or under sewage lines that are not protected from drips.

Customer Health Requirements

Provision must be made to prevent customers from contaminating food, utensils, or the food preparation or storage area. If the cart operator determines that a customer has contaminated food, a food storage container or utensil, the food should be disposed of and the container or utensil washed and sanitized. The customer should be tactfully advised and educated so as to prevent a reoccurrence.

The line of site between a customers mouth and the food storage, display or preparation area must be blocked in some way such as by a sneeze guard so as to prevent any possible contamination. Food items on display must be protected from contamination by customers by secure packaging, tight fitting lids, self closing lids or mechanical dispensers.

Garbage containers must be provided for customers to dispose of food waste, wrappings, or other trash. These trash containers must be emptied to prevent overflowing.

The hot dog cart operator is not to provide any seating for customers.

Summary

The Cal Code gives California the most stringent and in depth set of laws in the country governing mobile food facilities including hot dog carts. Yet any law is only as effective to the extent to which it is applied and enforced. This guide has been composed to help the typical hot dog cart operator understand and apply the Cal Code when operating an approved hot dog vending cart. In order to prepare this guide, much of the Cal Code has been edited so as to remove reference material that simply did not apply to a hot dog vending cart or its operation. The intent was to make the Cal Code more understandable.

California Hot Dog Carts and its affiliated companies do not warrant that all the information included above is free from error. Under the Cal Code, each hot dog cart owner and operator is required to attend and pass approved food safety training course. Attending such a course will no doubt aid the cart operator in understanding and applying the Cal Code. It is the responsibility of each hot dog cart operator to fully understand and apply the California Retail Food Code.

