Guide to Mobile Units
INTRODUCTION

The following Guide is meant to compile some of the more unique aspects of owning, operating, and constructing a mobile unit. This Guide is not meant as a replacement for the Alaska Food Code, 18 AAC 31. For additional food safety requirements, please review the Alaska Food Code 18 AAC 31.

For newly constructed or newly permitted mobile units a complete plan review and menu review may be necessary. Consult with your local Environmental Health Officer for more information.
Chapter 1 What is a Mobile Unit?

A mobile unit is defined as a type of food service that is located in a vehicle, trailer, or cart and is capable of moving easily daily. These units, unless they are a pushcart, must be capable of being licensed by the state as a motor vehicle, and can be moved without special conditions (such as a pilot car, flagging, or restricted hours of movement). Mobile units must completely retain their mobility at all times.

**TYPES OF MOBILE UNITS**

There are four types of mobile units. The mobile unit type is based on the menu and equipment provided on the unit.

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pushcart</strong></td>
<td>This type of unit is a wheeled, nonmotorized, mobile food unit which is manually moveable by one or two persons. A pushcart must contain on or within the cart sufficient food, utensils, paper products, cleaning supplies, potable water supply, and wastewater holding capacity for daily operations.</td>
</tr>
<tr>
<td><strong>Mobile Unit- not self contained</strong></td>
<td>This type of unit requires the support of a commissary or warehouse. Menu may be limited.</td>
</tr>
<tr>
<td><strong>Mobile Unit – self contained</strong></td>
<td>These types of units are constructed with all of the equipment and storage necessary to carry out day to day operations without the support of a commissary or warehouse.</td>
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<tr>
<td><strong>Mobile Retail Vendor</strong></td>
<td>These units sell packaged retail food items or whole or packaged seafood. The market is operated out a vehicle or trailer which is registered by the state as a motor vehicle.</td>
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*These mobile units are required to have a commissary or warehouse.*

**SELF CONTAINED MOBILE UNITS**

A self contained mobile unit is not required to operate out of an approved commissary as long as the unit has:

- installed potable water tanks and wastewater holding tanks;
- handwashing sinks, warewashing facilities, and utility sink; and
- adequate storage facilities on the unit for all food, equipment, utensils, including single service items and supplies used in operation.
Due to their limited storage capacity, there are very specific restrictions on what can be done on the pushcart and what must be done at the commissary. These guidelines are noted in the table below.

| Commissary | • All pre-preparation for menu items (including washing, slicing, peeling, cutting, and assembly);  
|            | • All pre-preparation of any non-potentially hazardous beverages;  
|            | • storage of food, paper products, or equipment; and  
|            | • washing of equipment or dishes.  
| Pushcart   | • must hold sufficient food, utensils, paper products, cleaning supplies, potable water supply, and wastewater holding capacity necessary for daily operations;  
|            | • all food and equipment must be contained on or within the cart;  
|            | • water tanks for handwashing must be at least 5 gallon capacity; and  
|            | • **NO cooling or reheating of leftovers** is allowed.  

**MOBILE RETAIL VENDORS**

All mobile retail vendors must store excess food and supplies at a commissary or warehouse, provide equipment as needed to maintain potentially hazardous foods at the temperatures required by 18 AAC 31.232, and keep the unit clean. However, specific types of mobile retail vendors have additional requirements.

**MOBILE SEAFOOD VENDOR**

If the vendor plans on obtaining whole, gutted, or gilled seafood that has not been further processed the seafood must be washed at a seafood processing facility permitted under 18 AAC 34 or a commissary. **No seafood processing may take place on the mobile unit.** In addition the operator must:

- have adequate refrigerator, freezer, or ice chests with adequate capacity to store all seafood products and maintain refrigeration temperatures of 41° F or freezer temperatures of 0° F or below;
- wash, rinse, and sanitize refrigerators/freezers/ice chests after each day's operation;
- use single-service gloves, tongs, tissues, or other utensils to minimize hand contact with the unpackaged product; and
- store excess seafood at a commissary.

If the operator plans on selling unpackaged, processed seafood, the mobile unit must operate out of a seafood processing facility permitted under 18 AAC 34 or a permitted commissary and return daily for cleaning and sanitizing of food contact surfaces. In addition, the operator must provide handwashing that includes, at a minimum:

- a container with a minimum capacity of two gallons, equipped with a faucet-type spigot, and filled with warm water;
- a container to catch wastewater from handwashing;
- soap and single service towels; and
- use single service gloves or tissues, to minimize bare hand contact with unpackaged product.

**ACTIVITIES OUTSIDE OF THE UNIT**  
18 AAC 31.620(f)

All operations and equipment must be an integral part of the mobile food unit, unless your proposed activity is one of these exceptions:

- one BBQ Grill if placed immediately next to the unit;
- one ice chest if placed immediately next to the BBQ Grill; and
- outside seating.

Local city or borough ordinances may still restrict activities allowed outside of the unit. Check with your local authorities for more details.

**NOTE:** If you intend to operate outside of your mobile unit during an event, doing activities other than those cited above, an additional temporary event permit may be required.

**BASE OF OPERATION**  
18 AAC 31.620(b)(3)

*Self contained mobile units may not need a base of operation if they have all of the equipment and utensils that a commissary would provide.*

Mobile units must operate from a licensed restaurant, commissary, or warehouse. A warehouse may be accepted as a base of operation if prepackaged goods are sold. If
a commissary is used, a completed [Commissary Letter of Agreement](#) will need to signed and submitted to DEC Food Safety and Sanitation Program.

In addition, with the exception of a self contained mobile unit, the operator will ensure that the unit is taken at least once each day to the commissary for support services such as cleaning the unit or food-contact surfaces, servicing potable water and wastewater tanks, and restocking food and supplies.
Chapter 2 – Food Sanitation Requirements

EMPLOYEE KNOWLEDGE

Either a designated Person in Charge or a Certified Food Protection Manager must be in charge during all hours of operation. This person is responsible for knowing the food sanitation rules and procedures within your unit and must be able to provide employees with information they need to perform their job.

CERTIFIED FOOD PROTECTION MANAGER (CFPM) 18 AAC 31.320

The mobile unit must employ at least one Certified Food Protection Manager (CFPM) who is involved in the daily operations of the establishment. Upon opening a CFPM must be hired or an existing employee that is designated must be signed up to take the CFPM class within 90 days of beginning operation.

FOOD WORKER CARDS 18 AAC 31.330

All employees must have Food Worker Cards within 30 days after hire. The copies of the Food Worker Cards must be kept on site and available for Department Review.

SICK EMPLOYEES MUST NOT WORK 18 AAC 31.300

Any person who is infected with a communicable disease or an infected wound may not work in the mobile unit in any capacity that may contaminate food or equipment.

EXCLUDE

Employees that experience the following symptoms may not work:

- Vomiting
- Diarrhea
- Jaundice (yellowing of the skin or eyes)

RESTRICT

Employees with the following symptoms Restrict employees from working with food if they have the following symptoms: sore throat with fever or lesion containing pus.
HANDWASHING

Handwashing facilities must have warm running water, dispensed soap, paper towels, and a wastebasket.

Handwashing is very important when working with food and drinks. Handwashing removes microorganisms that are known to cause illness. Food workers need to wash hands between changing gloves, changing tasks, after handling raw meats, and anytime hands may have been contaminated. (18 AAC 31.525)

NO BARE HAND CONTACT

Bare hand contact of ready to eat foods is not allowed. An operator of a mobile food unit must make sure that ready to eat food is prepared without bare hand contact by using gloves, tongs, and the proper use of utensils. (18 AAC 31.220)

FOOD SOURCE

All food must be wholesome and free of spoilage, microorganisms, toxic chemicals, and other harmful substances that can make people sick. All food products must be prepared, stored, handled, or displayed so that it is safe for people to eat.

Home canned or home processed foods are not allowed. All food must be either prepared in the unit or obtained from an approved source. Home prepared foods (with the exception of those lined out in 18 AAC 31.012) must not be stored on the unit or served to the public. The only alternative to preparing the food in the unit is to prepare the food in an approved licensed facility such as commissary.

For more information on Cottage Foods please visit: http://www.dec.alaska.gov/eh/fss/Food/Cottage_Foods.htm

WATER SOURCE AND TESTING

This section does not apply to a mobile unit that only dispenses prepackaged goods.

A mobile food unit must be able to provide clean water for handwashing, cooking, and cleaning. The water tanks must be of adequate size to hold at least one day’s supply of fresh water.

PORTABLE WATER TANKS

Portable water tanks must meet the following requirements:
- all materials must be NSF (or equivalent) certified;
- cannot be used for any other purpose other than to carry, hold, or dispense potable water;
- are protected from contamination during storage;
- the water inlet must be ¾ of an inch in diameter or less;
- the inlet must be capped and cannot be contaminated by waste discharge, road dust, or grease.

**SUPERCHLORINATION**

At least annually and before seasonal start up the operator of a mobile food unit (except a pushcart) will need to do the following:

- superchlorinate each potable water tank for at least two hours with 50ppm chlorine solution;
- drain, thoroughly rinse, refill the tank; and
- submit water samples to a certified laboratory for coliform analysis.

**WATER SAMPLES**

Water samples need to be submitted to a certified laboratory for coliform analysis before initial startup (after superchlorination) and every three months during operation. Records should be retained on site for review by an Environmental Health Officer during an inspection.

If a sample exceeds the maximum contaminant level for total coliform bacteria the following action must be taken:

- immediately superchlorinate the tank as described above; and
- submit another water sample to a certified laboratory for total coliform analysis within 24 hours after superchlorination.

**WASTEWATER**

*This section does not apply to a mobile unit that only dispenses prepackaged goods.*

The operator of a food establishment shall make sure that wastewater from the facility is discarded into a public sewer or a wastewater disposal system built and operated as required by 18 AAC 72.
**WASTEWATER TANK**

The mobile unit shall be constructed with a wastewater tank that:

- is permanently installed;
- has a volume that exceeds by 15% the volume of the potable water tank; and
- the wastewater discharge connection is lower than the potable water inlet.

**DISHWASHING**

A three-compartment sink must be used to wash, rinse, and sanitize all equipment and utensils. You will need to wash equipment and utensils with soapy hot water, rinse with hot water, immerse in sanitizer, and air dry. Sanitizer can be made up of 50-100 ppm of chlorine bleach or 200ppm quaternary ammonium. Use test strips that are made for the sanitizer you are using.

For units that do not have dishwashing, you must bring multiple clean utensils to replace any that have been in use for four hours or utensils that have been dropped or contaminated.

**RESTROOMS**

Toilet facilities for employees must be available within 200 feet of the unit while it is operating. Restroom facilities may be supplied by a port-a-potty or restroom in a neighboring building. Handwashing must be available in the restroom facilities.

**GARBAGE AND REFUSE**

The operator of a mobile food unit shall provide sufficient containers inside or next to the mobile unit while the unit is operating. Containers must be easily cleanable.