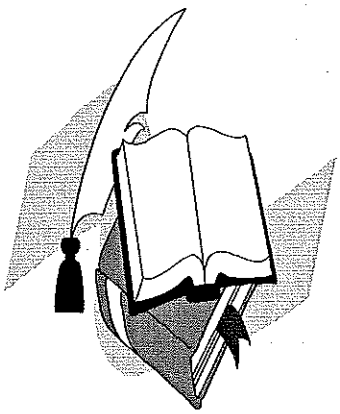
Office of State Fire Marshal

Topic:

Mobil Food Units

April 1, 2016 General Information Notice 2016-01



With the warmer weather approaching, the Office of State Fire Marshal has been fielding many questions regarding mobile food units and the application of the Connecticut State Fire Safety (CSFSC) and Prevention Codes (CSFPC) to them.

First, let's start out by defining what we are addressing. This General Information Notice covers both motorized style food units i.e. food trucks as well as food carts with a means of cooking that is fueled from LP-Gas cylinder(s) of greater than 16.8 oz. nominal capacity mounted on the cooking appliance, vehicle or cart.

The CSFSC does not apply to mobile style food trucks or carts. This is articulated out in 29-292-14e which states that Part III of the code 'shall apply to all buildings and structures'. Discussions with the Deputy State Building Inspector, in which he concurs, that the State Building Code would not look at these units as a building or structure either. Additionally in Part IV of the CSFSC section 1.3.2 states that this portion of the code only applies to vehicles and vessels that are immobile, attached to a building, or permanently fixed to a foundation.

Section 29-291-2a (c) of the CSFPC is the enabling factor for that code; since the CSFSC and the CSBC are not applicable to the issue, the CSFPC applies. The scope of the code under 29-291-3a articulates in subsection (a) (1) inspections of permanent and temporary systems and other fire and related life safety situations; and in (a) (9) storage, use, processing, handling of flammable gasses. Based on this we are concerned with the LP-Gas system(s) on the unit and not the unit itself (construction, egress, etc.).

Chapter 69 of the CSFPC addresses LP-Gas systems, and based on section 69.1.1.1the application of this chapter, sections 60.1 through 60.4 of the CSFPC in addition to NFPA 58 apply as applicable. Section 69.3.12 addresses LP-Gas Systems on Vehicles (Other Than Engine Fuel Systems) is an appropriate section to refer to.

Some major areas addressed within Chapter 69 are: container installation requirements (69.3.12.3), installation of container appurtenances (69.3.12.4), piping (69.3.12.3.5), equipment installations (69.3.12.3.6), appliance installation on vehicles (69.3.12.3.7), general precautions [fire extinguishers] (69.3.12.3.8), and lastly parking [garaging], servicing and repair (69.3.12.9).

From Section 69.3.12.1.1.1, the requirements of the U.S. DOT apply, most applicably 49 CFR 180.205(d) and 180.209. These sections deal with the refilling and requalification of LP-Gas cylinders. The USDOT has an excellent handout for mobile food vendor operators to educate them on the requalification requirements for the LP-Gas cylinders. Also, there is a website available from U.S. DOT, htpps://phmsa.dot.gov/hazmat/regs/sp-a/approvals/cylinders where one can check on the validity of either a RIN (Requalifier Identification Number) or VIN (Visual Identification Number) used by the requalifying firm.

With respect to the cooking operation itself, commercial cooking equipment is addressed in Chapter 50 of the CSFPC. Section 50.1.1, application, articulates that the operation, inspection, and maintenance of commercial cooking equipment. Since the CSFSC and CSBC do not address these types of units, there is no requirement for the installation of a hood system and as such it is not the intent of the State Fire Marshal to require a hood and extinguishing system to be installed. Section 13.6.1.2.6 does require portable fire extinguishers where commercial cooking equipment is utilized.

While portable electric generators are not specifically addressed in the CSFPC for this type of a unit, section 11.7.2.1.2 gives some practical guidance. As a reminder the manufacturer's instructions shall to be followed specifically with respect to locations, clearances, fueling, etc. For liquid fueled units, Section 66.9.4 covers the portable containers used for storage of the fuel, while section 11.7.2.1.2 as stated previously gives some practical guidance on refueling.

The National Fire Protection Association (NFPA) website has printable material on fire safety tips and U.S. DOT requalification guidelines for propane cylinders for food truck/mobile cooking operators. The site is: http://www.nfpa.org/safety-information/for-consumers/vehicles/food-truck-safety.

Thank you,

William Abbott

William Abbott
State Fire Marshal
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