Catering and Host Facilities

JOEL WRIGHT, REHS
COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH
San Diego’s Catering Ordinance and Assembly Bill 2524

A Unique Challenge
Overview of presentation

- Growing Trends in SD lead to public health concern
- Political interest in trend
- Pilot Project
- One County approach, TEAM approach
- Creation of an ordinance
- Implementation
- State AB created
- Lessons learned
- Next steps
Exploding Craft Brewery Industry
Exploding Craft Brewery Industry

• Over 200 Breweries in San Diego County
• Calcode’s Food Facility Exemption for breweries
• Brewery Customers wanted food!
Local Agricultural Ordinance Allows New Wineries
Local Agricultural Ordinance Allows New Wineries

- Ordinance loosened Zoning and Code restrictions
- CRFC exemption for winery tasting rooms
- Winery customers wanted food!
Catering Wasn’t Previously Defined in CRFC

113737  Definition of $a_w$

113739  Definition of Beverage

113740  Definition of CCR
Conduct pilot project to study catered food service for public events held at local breweries and wineries.

Explore options for developing a catering ordinance setting clear rules and food safety standards for catering.

Return to the Board within 210 days with pilot project results and recommendations for a local catering ordinance that would implement food safety standards in alignment with the CRFC.
Pilot Project Initiation

- Break up time – 3 months for study and 3 months to analyze
- First month, met with stakeholders, Building and Codes
- Breweries/wineries apprehensive of regulation
- Zoning
- Illegal operations
- Food trucks didn’t work

Game Plan – Observe, Educate, Address
Pilot Project

- Couldn’t get volunteers
- Only able to do 3 inspections in the first month
- Soft Approach
- Unannounced Inspections

Inspected 13 breweries and 12 wineries
Pilot Project Results: Food Safety

Most common risk factor violations observed:

- **Cold Holding Temperatures**: 84% of cold holding violations were found in ice chests, not refrigeration.
- **Food Contact Surfaces**: Only 44% of foodhandlers had access to a sink to wash and sanitize utensils that could become contaminated.
- **Handwashing**: 50% of foodhandlers did not have access to a hand sink.
Pilot Project Results: Sales Model

- Direct Food Sales Model
- Participant Feedback

- Most food was sold directly to the public instead of to a pre-determined number of guests
- Risk factors did not increase with direct sales
Creation of an Ordinance

- Subject Matter Experts
- Food Vendors
- Zoning, Building and Codes
- Brewery and Winery Stakeholders
- Cities
- County Counsel
- Board Aids and County Executive Groups
San Diego County Ordinance

Direct Sales Catering and Host Facility Must Operate in Conjunction

- Prepare food at a permitted commissary
- Commercial mechanical, portable refrigeration
- Full enclosure
- Utilize Host Facility 3-compartment sink
- Safe food transport
- Handwashing sink in their catering booth
- Serve directly to the public at host facility

Direct Sales Caterer
San Diego County Ordinance

Direct Sales Catering and Host Facility Must Operate in Conjunction

- Host Facility provides infrastructure to support Direct Sales Caterer
  - Potable water
  - 3-compartment sink
  - Water heater
  - Mop sink
  - Hand sink
  - Electricity
  - Commercial restroom

- Brewery or Winery
- Undergo plan review
Modernize Existing Catering Program

**IMPROVEMENTS**

1. Use of commercial refrigeration
2. Commissary and field food safety inspections
3. Provide food safety instructions when only delivering food
4. Retention of records help food traceback
Implementation

The ordinance was unanimously approved!

- Educational approach
- Development of guidelines
- Forms
- Website
- More outreach

Catering Publications

- Catering Ordinance Clean Version: PDF
- County News Center: Article
- Catering Pilot Study Findings and Recommendations: PDF
- Commissary Letter of Agreement Form: PDF
- Food Options at Breweries and Urban Wineries: PDF
- Food Options at Unincorporated Wineries: PDF
- Host Facility Requirements for Breweries: PDF
- Host Facility Plan Check Flow Chart: PDF
- Host Facility Plan Submittal Guidance and Checklist: PDF
- Direct Sales Catering - Standard Operating Procedures Worksheet: PDF
Implementation of the Program

• Soft rollout for 6 months
  • [https://www.sandiegocounty.gov/content/sdc/deh/fhd/food/catering.html](https://www.sandiegocounty.gov/content/sdc/deh/fhd/food/catering.html)
• Posted documents
• Meetings with stakeholders, Brewery Guild, operators

• Grease trap problem
• Warewashing sink
Assembly Bill 2524
AB 2524 – Catering and Host Facilities

- Statewide issue
- Assembly Bill (AB) sponsored by CA State Assemblyman Wood
- Catering Working Group
  - How long could the caterers operate?
  - Level of food preparation?
  - Host facility business type?

- Bill passed in September, 2018
- Went into effect January 1, 2019
Catering and Host Facilities

- Catering Operation is now defined in CRFC!
  - §113739.1 – a food service that is conducted by a permanent food facility approved for food preparation where food is served, or limited food preparation is conducted, at a location other than its permitted location, in either of the following circumstances:
    - (1) As part of a contracted offsite food service event
    - (2) When operating in conjunction with a host facility with direct food sales

- §113789 – Catering Operation added to definition of a Food Facility
Limited Food Preparation §113818

YES:

- Heat, fry, bake, roast, pop corn, shave ice, blend, steam/boil hot dogs, assemble food
- Dispense and portion nonpotentially hazardous food
- Hold, portion and dispense foods for Satellite Food Service
- Slice and chop on heated cooking surface only
- Cook to order
- Beverages for immediate service (no frozen milk)
Limited Food Preparation §113818

NO:

- Slice and chop food, unless on heated cooking surface only
- Thaw
- Cooling potentially hazardous food (PHF)
- Grinding raw PHF
- Reheat PHF for hot holding, except hot dogs and tamales
- Wash food
- Cook PHF for later use
- Frozen milk products
Catering and Host Facilities

• Host Facility also defined in CRFC

  • §113806.1 – a facility located in a brewery, winery, commercial building, or another location as approved by the local enforcement agency, that meets applicable requirements to support a catering operation that provides food directly to individual consumers for a limited period of time, up to four hours, in any one 12-hour period and that has a permit pursuant to Section 114328.1.

  • §113789 – Host Facility also added to definition of a Food Facility

AB 2524
Catering and Host Facilities

- Catering Operation must provide written SOPs
  - §114328

  - Transportation of Food
  - Food types – Limited Food Preparation
  - Holding temperatures
  - Cleaning
  - Trash
  - Handwashing

AB 2524
Host Facility
(CRFC §114328.1)

• Show locations of:
  • Food service operation
  • Handsinks
  • Restrooms
  • Garbage
  • Waste water disposal facilities
**Host Facility Requirements**

A brewery, winery, commercial building or other location approved by Environmental Health that meets specified infrastructure and operational requirements has the option to obtain a Host Facility Permit. This permit allows for expanded food options by hosting a catering operation who can sell and serve food at this approved site. A Host Facility Permit is not required for sites that only utilize catering for private events or that only host food trucks.

### Operational Requirements for a Host Facility Permit

**Restrooms (Toilet and Handwashing):** An approved restroom facility in the Host Facility that the catering operation will be using is required. The restroom must be located within 200 feet of the area where the catering operation prepares the food and must be accessible to all food handlers. The restroom must meet all local building and plumbing code standards. A common use restroom agreement must be submitted if a restroom is to be utilized outside of the Host Facility.

**Additional Handwashing:** A permanently plumbed handwashing sink, in addition to the restroom handsink, for Caterer’s use may be required. All handwashing sinks shall have a minimum of 100°F-108°F warm water under pressure for a minimum of 15 seconds. Handsinks must have hand soap and single use paper towels in dispensers.

**Refuse and Liquid Waste:** The Host Facility must have approved methods for disposal of refuse and liquid waste. A curbed janitorial sink equipped with hot and cold water and an atmospheric vacuum breaker or other approved backflow device the faucet may be required.

**Potable Hot and Cold Water:** Host facility must have a hot water heater that consistently supplies hot water at a minimum 120°F, and that is available at one of the sink fixtures at a peak demand rate.

**Location for Catering Operation:** Host facility must provide a suitable location where the caterer will set up their equipment. The Host facility must ensure that operations comply with all jurisdiction, including but not limited to Zoning and Fire Department.

**Annual Inspection:** Host facilities are inspected annually by Environmental Health.

**Standard Operational Procedures:** Host Facilities must maintain operating procedures, methods, and schedules for cleaning food related equipment, specifically, provided by the Host Facility to support the catering operation and how it will be maintained, hazardous foods will be maintained and how you will maintain a list of catering operating Facility with their menus, dates and times of their operations.

### Plan Check and Permit Application Process for a Host Facility

1. Use the Host Facility Flow Chart to determine if your facility is eligible for a consultation or plan submission.
2. Once you determine whether you qualify for a consultation or plan submission, complete the correct application and submit to the appropriate Environmental Health office.
3. Include with submission, a Standard Operating Procedure that includes: procedures, methods, cleaning equipment and structures, and for disposal of refuse, and list of catering operations that meet the Host Facility with proposed menus.
4. If your application is for plan submission, include three (3) sets of plans with your application.
5. After receiving approval from Environmental Health, you may then apply for your Host Facility Permit.

### Contact Information

For more information regarding options to serve food at your businesses, please contact our office during

- **Temperature Holding**
- **Cleaning**
- **Garbage**
Host Facility – §114328.1

- Provide list of Catering Operations supported by Host Facility
- Enforcement Agency may establish additional structural or operational requirements (fryers, etc…)
- 4 hours max in 12 hour period
- Food, utensils, equipment, tableware and linen returned to Catering Operation for cleaning, sanitizing and storage
- Toilet and handwashing within 200 feet of food service
Catering Operations

May use open-air barbecues (CRFC §113843) or Outdoor wood-burning ovens (CRFC §113846)
Catering Standard Operating Procedures

This document will help you prepare the required written description of your proposed catering activities and the equipment and standard operating procedures that you propose to use for your catering operation. All documents required will be reviewed and when these procedures and/or standards are approved, a field inspection will be required at the proposed host facility location. A signed and APPROVED copy of this document must be maintained with your catering operation during all operating hours.

Please note that any changes to the menu, equipment, or procedures listed on your approved form will require another review and written approval by Environmental Health.

Catering Operations Name ____________________________
Contact Information ____________________________
Address: ____________________________
City: ____________________________
State: ____________________________
Zip: ____________________________

HOST FACILITY REQUIREMENTS

A brewery, winery, commercial bakery or other location approved by Environmental Health that meets specified infrastructure and operational requirements has the option to obtain a Host Facility Permit. This permit allows for expanded food options for hosting a catering operation that can sell and serve food at this approved site. A Host Facility Permit is not required for events that only utilize catering for private events or that only host food trucks.

OPERATIONAL REQUIREMENTS FOR A HOST FACILITY PERMIT

RESTRICTIONS (FOODS AND HANDLING):

1. An approved food facility in the Host Facility that the catering operation will use for food preparation is required. The facility must be located within 200 feet of the area where the catering operation prepares the food and must be accessible to all food handlers. The restroom must meet all local building and plumbing code standards. A common use restroom agreement must be submitted if a restroom is to be utilized outside of the Host Facility.

2. ADDITIONAL HANDLING:

- A permanent food service kitchen, with all plumbing, electrical and air conditioning equipment supplied by the Host Facility, is required for food service preparation, the kitchen of the Off-Site Food Service operation must be within 200 feet of the area where the catering operations prepare the food.
- A separate hand-washing sink equipped with hot and cold water and an automatic soap and hand sanitizer station with soap and hand sanitizer supplies is required in addition to all hand washing sinks within the catering operation's kitchen.

POTABLE HOT AND COLD WATER: Host facility must have a hot water heater that consistently supplies hot water at a minimum 130°F, and that is available at one of the sink outlets at a faucet demand rate.

LOCATION FOR CATERING OPERATION: Host facility must provide a suitable location where the catering operation can set up its operations. The type of food service provided by the catering operation is contingent upon the location where they will set up their operation. The Host facility must ensure that operations comply with all applicable codes in their jurisdiction, including but not limited to Zoning and Fire Department.

ANNUAL INSPECTION: Host facility is inspected annually by Environmental Health.

STANDARD OPERATIONAL PROCEDURES: Host Facilities must maintain operating procedures that describes the procedures, methods, and schedules for cleaning food related equipment; specifications for equipment that will be supplied by the Host Facility to support the food handling operations; and how the cleaning operations are being maintained in good repair; how potentially hazardous foods will be maintained and how you will maintain a list of catering operations that will operate at the Host Facility with their menus, dates and times of their operations.

The following is the application process for a Host Facility Permit:

1. Use the Host Facility Flow Chart to determine if your facility is eligible for a consultation or plan submission.
2. Once you determine whether your facility qualifies for a consultation or plan submission, complete the corresponding application and submit to the appropriate Environmental Health office.
3. Include with submission a Standard Operating Procedure that includes procedures, methods, schedules and instructions for cleaning and maintenance of the equipment, storage, disposal of refuse; and a list of catering operations that will be supported by the Host Facility with proposed menus.
4. If your application is for plan submission, include three (3) sets of plans with your application.
5. After receiving approval from Environmental Health, you may then apply for your Host Facility Permit.

Contact Information

Additional information regarding options to serve food at your brewery/winery, please contact our offices during normal business hours or by email at info@nameyourcounty.ca.gov. You can also visit Environmental Health’s website at https://www.gencivic.gov/catering.
Lessons learned
Lessons Learned

• Include State and other jurisdictions earlier
• Grease trap issue
• Mop sink
• Limited Food Preparation
• Getting SOP’s
What's next?
NEW MINDSET
NEW RESULTS
Thank you!

Joel Wright
County of San Diego
Department of Environmental Health
joel.wright@sdcounty.ca.gov
(858) 505-6879