

DATE: October 2, 2000

TO: All Local Health Departments
Attn.: Health Officer/Director of Environmental Health/Chief Sanitarian

FROM: Allen Anderson
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Food Service Sanitation Section
Food and Dairy Division

SUBJECT: Reclaimed Oil Drum Cookers for Food Service Cooking/Hot holding Equipment

Background:

Recently, the Food Service Sanitation Section was asked to comment on the use of reclaimed oil drums for outdoor grilling in temporary food service establishments. Many issues come into question when these types of cookers are used. What metals were they made of? What type of materials did they contain previously? Do they meet the requirements of the 1999 FDA Food Code as it relates to both food contact and non-food contact surfaces? Would these meet the requirements of NSF Standard 4, for food cooking, and hot-holding devices? Should it be the owner's responsibility to provide documentation of the equipment's safety?

Purpose:

The purpose of this memorandum is to provide guidance on the types of equipment that should be allowed for use in temporary food service settings.

Criteria:

To be consistent with the 1999 FDA Food Code, food contact surfaces of equipment used in the cooking, broiling, or grilling of food may not allow the migration of deleterious substances or impart colors, odors, or tastes to food. They shall also, under normal conditions, be safe; durable, corrosion-resistant, and nonabsorbent; sufficient in weight and thickness to withstand repeated cleaning; be finished to have a smooth, easily cleanable surface; and be resistant to pitting, chipping, crazing, scratching, scoring, distortion, and decomposition.

Non food contact surfaces of equipment that are exposed to splash, spillage, or other food soiling, or that require frequent cleaning shall be constructed of a corrosion-resistant, non-absorbent, and smooth material.

New drums that have never been used or painted may fit the criteria listed above. These should also fit the criteria of NSF standard four.

Drums that have been previously used cannot be approved for use due to potential contaminants within the drums unless verified as safe. It is the responsibility of the operator to demonstrate such equipment is safe. The most credible means of verification is through a third party by a certified testing process.

Also, it shall be the responsibility of the permit holder to replace existing facilities and equipment if that equipment constitutes a public health hazard, or no longer complies with the criteria upon which the equipment was accepted. In the case of drums that contained potential contaminants, these would need to be replaced.

If you have questions please feel free to contact me at (517) 241-0934.

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