

**From:** Lori Johnson <lorij@wafoodtrucks.org>  
**Sent:** Tuesday, June 11, 2019 7:14 AM  
**To:** DES SBCC <sbcc@des.wa.gov>  
**Subject:** Testimony on the adoption of the 2018 IFC

Regarding the Implementation of the 2018 IFC and adoption of the new section 319 for mobile food vendors:

319.3 - Exhaust Hood Cooking equipment that produces grease-laden vapors shall be provided with a kitchen exhaust hood in accordance with Section 607. (Section 607 indicates professional hood cleaning required every 6-months with professional tags posted by approved service provider.) *Has the building code council researched who in Washington are "approved" service providers? Has the building code council addressed the fact that many of these mobile food vendors are seasonal and only vend for 5-months or less or just for the "event" season? This every 6-month requirement would cause a hardship unnecessarily on these seasonal vendors.*

319.5 Appliance Connection to Fuel Supply Piping Gas cooking appliances shall be secured in place and connected to fuel-supply piping with an appliance connector complying with ANSI Z21.69/CSA 6.16. The connector installation shall be configured in accordance with the manufacturer's installation instructions. Movement of appliances shall be limited by restraining devices installed in accordance with the connector and appliance manufacturers' instructions. *Has the building code council addressed this item with our state's FAS department of Labor and Industry? Many vendors will be temporarily shut down to go back through the L & I approval process to meet this requirement and put several out of business. These vendors with trucks or trailers have already met the L & I build standards.*

319.10.3 Fuel Gas Systems LP-gas containers installed on the vehicle and fuel-gas piping systems shall be inspected annually by an approved inspection agency or a company that is registered with the U.S. Department of Transportation to requalify LP-gas cylinders, to ensure that system components are free from damage, suitable for the intended service and not subject to leaking. CNG containers shall be inspected every 3 years in a qualified service facility. CNG containers shall not be used past their expiration date as listed on the manufacturer's container label. Upon satisfactory inspection, the approved inspection agency shall affix a tag on the fuel gas system or within the vehicle indicating the name of the inspection agency and the date of satisfactory inspection. *Has the building code council researched if our state has any service providers that are considered an "approved inspection agency" to requalify gas cylinders? This is already looked at by fire and it is not necessary to add this extra service cost on for vendors.*

*Is the building code council aware of our bill to standardize fire code for the mobile food industry introduced in 2019?*

*If this 2018 version of the code is adopted "as is", this will severely and negatively impact our industry.*

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*"The punishment of wise men who refuse to take part in the affairs of their government is to live under the government of unwise men." ~ Plato*