



Massachusetts Department of Public Health
Bureau of Environmental Health
305 South Street
Jamaica Plain, MA 02130-3597
(617) 983-6712 (617) 983-6770 - Fax

Food Protection Program Policies, Procedures and Guidelines

Issue: Exposed Ceiling Construction in Retail Food Establishments No: RF-11

Background:

In a letter dated July 2, 1991, the Department's interpretation regarding construction of ceilings in food storage areas was based on section 590.022 (G) Exposed Construction of 105 CMR 590.000 - Minimum Sanitation Standards for Food Establishments – Article X which were the regulations that were in effect at that time and consistent with the federal Food and Drug Administration's (FDA) ceiling construction requirements outlined in section 7-203 of the FDA 1982 – Retail Food Store Sanitation Code. The letter stated that “studs, joists and rafters cannot be exposed in food preparation, food storage and warewashing areas, walk-ins, dressing rooms, locker rooms, toilet rooms and vestibules. However, ceilings in areas where foods are stored in master cartons, or protected by shrink wrap such as in receiving and back storage areas in large retail food establishments, may be exempt from section .022 (G). Exposed ceiling construction is not acceptable in areas where food is exposed such as in salad bar or produce repacking operations and in areas where individually packaged foods are stored.” A similar response was published in the Fall 1991 Food & Drug Reporter Q & A published by the Department.

In the 1997 Reporter, formerly the Food & Drug Reporter, a similar response was published regarding ceiling construction in warehouse-style retail food operations which stated that “the Department was in the process of adopting provisions of the U.S. Food and Drug Administration (FDA) 1997 Food Code which will likely include those sections relative to ceiling construction. Section 6-101.11 (A) (3) and 6-201.18 of the FDA Food Code contain specific language which exempts such operations from having smooth and easily cleanable ceilings in areas where packaged food is displayed. Smooth and easily cleanable ceilings must be present in food preparation areas, walk-in refrigerators, warewashing areas, toilet rooms, mobile food establishments servicing areas and areas subject to flushing or spray cleaning methods. We also recommend that smooth and easily cleanable ceilings be located over unpackaged produce areas. The “Division” (currently Food Protection Program) is unaware of any significant health hazards associated with such warehouse-style retail food establishments currently operating in Massachusetts. FDA representatives on the national Conference for Food Protection Plan Review Committee reaffirmed the Food Code requirement and indicated that this was not a significant public health issue. They suggested the use of air curtains at loading docks to prevent the entry of birds. Also, air ducts, vents and any opening created during construction and maintenance should be kept covered to prevent the entry of pests and excessive dust. In reference to cleaning schedules, there is no recommendation since the quality of construction

and environmental conditions could vary from facility to facility. The rafters and beams must be cleaned when there is dust accumulation.”

Issue:

There currently are supermarkets in Massachusetts that are not considered to be “warehouse-style” retail food operations that have exposed ceiling construction in areas where there are individually packaged foods on display. There are local health departments that allow the exposed ceiling construction in supermarkets as long as there are finished ceilings in areas where food is unprotected. This is creating a problem in one Massachusetts jurisdiction because they follow the Department’s interpretation dated 1991 that does not allow this in non-“warehouse-style” retail food operations and this jurisdiction has observed accumulated dust and dirt, peeling paint and birds roosting on beams and rafters.

Regulation:

In accordance with 105 CMR 590.000 - State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments which adopts by reference the FDA 1999 Food Code, the Department’s interpretation regarding section 6-101.11 (A) (3) and 6-201.18 relative to ceiling construction is the same reason as stated above for the 1997 Food Code, which exempts such operations from having smooth and easily cleanable ceilings in areas where packaged food is displayed.

In accordance with 1999 Food Code section 6-501.11 and 6-501.12, the physical facilities shall be maintained in good repair and cleaned as often as necessary to keep them clean. Section 6-501.111 requires that the presence of insects, rodents, and other pests be controlled to minimize their presence on the premises. Retail establishment operators should have standard operating procedures (SOPs) in place that are adhered to that addresses the cleaning & maintenance of overhead structures and procedures of controlling pests in situations where there is an exposed ceiling construction.