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3-A SSI Interpretations Group Ruling on RAN Submitted Against Carollo srl

Dated 2/22/2018

The 3-A SSI Interpretations Group (IG) met via Webinar Session on February 22, 2018 to discuss and rule on the December 17, 2016 Report of Alleged Nonconformance (RAN) submitted by Idaho Department of Agriculture.

The subject RAN includes multiple alleged nonconformities with Carollo srl Check Valve models DN10-DN100 per criteria found in the *3-A Sanitary Standards for Vacuum Breakers & Check Valves, Number 58-01*.

According to 3-A SSI procedures an informal resolution was attempted between the RAN submitter and the equipment fabricator. The equipment fabricator did not accept the terms of the informal resolution. Idaho Department of Agriculture rejected the terms as well. Therefore, the RAN issues requiring interpretation of the Standard criteria were forwarded to the IG for resolution. The following table is excerpted from the RAN as filed to indicate the statements to be reviewed by the IG.

3-A Sanitary Standard Section and Paragraph(s)	Reason for Nonconformance
58-01; D10 There shall be no threads on product contact surfaces	Internal shutter is a 2 piece threaded halves with a captured seal.
General Standards state “E9.2 Enclosed Threads E9.2.1 When permitted by specific equipment 3-A Sanitary Standards or 3-A Accepted Practices, enclosed threads shall conform to all of the following:”	58-01 does not state the allowance of said threads or captured seal

The IG made the following rulings on the RAN allegations after reviewing all of the evidence from both parties, reviewing the criteria within 3-A Sanitary Standard and reviewing previous formal Interpretation Decisions:

1. With respect to the first alleged nonconformity, the 3-A SSI IG agreed that the construction of a component in a product contact area employing enclosed threads are not allowed as there is no specific allowance for enclosed threads in Standard 58-01. When the seal (O-ring) fails, the void behind the seal without any leakage detection or leakage pathway would become a soiled area within a product contact surface. Furthermore, the IG has reaffirmed a formal Interpretation Decision made May 25, 2004 whereby enclosed threads are not allowed per Clause D10. This decision can be found on the 3-A SSI website:

<http://www.3-a.org/Standards-Committees/Interpretations-and-Public-Review-Drafts>

and specifically:

<http://www.3-a.org/Portals/57/Documents/Interpretations/intercomdecision504.pdf>.

IG Ruling: The RAN concern is sustained. Construction does not meet Standard 58-01

2. The second observation alleges the check valve component is not conforming with criteria from the *3-A Sanitary Standard for General Requirements, ANSI/3-A 00-01-2018*.

IG Ruling: The second RAN item is not sustained since the General Requirements are not included as a Normative Reference in the *3-A Sanitary Standard for Vacuum Breakers and Check Valves, 58-01* at the time the RAN was submitted.

It should be further noted that the *3-A Sanitary Standard for Vacuum Breakers and Check Valves, 58-01* was revised and is effective on March 18, 2018 as *3-A 58-02*. This second edition revision does utilize the *3-A Sanitary Standard for General Requirements, ANSI/3-A 00-01-2018* and does not allow for the use of exposed or enclosed threads on product contact surfaces.

Date Received by 3-A SSI: 12/17/2016	IG Chair: Lyle Clem
Date Received by 3-A SSI IG: 1/25/2018	
Date of 3-A SSI IG Decision: 2/22/2018	Date: 2/22/2018