



## REQUEST FOR INTERPRETATION OF 3-A SANITARY STANDARDS OR 3-A ACCEPTED PRACTICE CRITERIA

<b>Requester Name and Address:</b>  Mark Ream Alfa Laval Inc. 8201 104 <sup>th</sup> Street P.O. Box 581909 Pleasant Prairie, WI 53158-0909	<b>Standard/Practice Name and Number:</b>  53-02, Compression Type Valves for Milk and Milk Products
<b>Requester Telephone No.:</b>  262-947-3712 mark.ream@alfalaval.com	<b>Criteria Paragraph Number:</b>  B3.1 and D4.1

Specific wording requested for interpretation:

**“B3.1 *Product Contact Surfaces*: Shall mean all surfaces that are exposed to the product or from which liquid may drain, drop or be drawn into the product.”**

and

**“D4.1 *Product contact surfaces shall be self-draining when properly installed.*”**

Supporting Comments:

The stem seal design of several manufacturers' single seat compression valves could be subjectively interpreted as non-compliant with the standard. The stem seal of most single seat compression valves consists of some type of removable elastomeric barrier (o-ring, lip seal, etc.) surrounding the stem that allows it to pass through the valve body without product leakage. Some designs maintain a guide bushing above the stem seal, while others do not. Where the confusion over interpretation seems to lie as to whether or not the area above the lip seal is a true Product Contact Surface as defined by the standard, and if so, how does it relate to paragraph D4.1.

### **Interpretations Committee Response:**

The Interpretations Committee finds that 3-A Sanitary Standard #53-02 does not adequately address/convey stem seal design criteria (o-ring, lip seal, etc.). The Standard is silent to both elastomeric barrier fabrication criteria and stem seal location requirements (bonnet or shaft). Although the Standard does not appear to address the area above a stem seal, that may or may not include: the guide bushing, stem or the area around the stem (depending upon the valve design). Because the stem rises and falls through this area, the Interpretations Committee is of the opinion that this area would be considered product contact surface as defined in B3.1 and therefore would have to comply with the drainage requirements specified in D4.1.

Because 3-A Sanitary Standard #53-02 lacks critical stem seal design criteria which is necessary to assure a valid TPV of Compression –Type Valves. Pending revision of the standard, the committee recommends the 3-A SSI Board of Directors defer this standard from TPV program integration until the revision is complete.\*

*\* The 3-A SSI Board of Directors considered the recommendation in a special meeting on January 10, 2005 and agreed to defer 3-A Sanitary Standard #53-2 from the TPV program pending revision at the earliest possible date, but not later than August 1, 2005.*

Date Received by 3-A SSI: 8/12/04	IC Chairperson Signature:
Date Reviewed: 12/16/04	
Date of Response: 1/11/05	Date: