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**IC Ruling on RAN Submitted Against  
Wilden Pump Co.  
Dated 02/26/2013**

The 3-A SSI Interpretations Committee (IC) met via Conference Call on July 9, 2013 to discuss and rule on the February 26, 2013 RAN submitted by the Dairy Grading Branch, United States Department of Agriculture (USDA). The RAN alleged multiple issue of nonconformance with the criteria of *3-A Sanitary Standards for Diaphragm Pumps, Number 44-03*.

According to 3-A SSI procedures an informal resolution was attempted between the RAN submitter and the equipment fabricator. The equipment fabricator accepted the terms of the informal resolution. USDA rejected the terms. Therefore, the RAN was forwarded to the IC for resolution.

The IC made the following rulings on the RAN allegations after reviewing all of the evidence from both parties, reviewing the criteria within 3-A Standard 44-03, and consultation with a technical expert representing the Working Group that developed the standard.

**RAN Allegation 1**

The glass beaded surfaces did not comply with the RA 32 µin surface finish requirement.

Relevant Standard section: D1

**IC Ruling: The RAN concern is not sustained. The standard section D1 requires the surface finish to be the equivalent to a RA 32 µin. The fabricator stated that the surfaces had not been treated with the glass beading process but by another surface treatment. The RAN submitter provided no documentation of the surface finish other than a visual observation. Whereas, the fabricator provided profilometer readings that demonstrated the surface finish conformed to the RA 32 µin requirement.**

**RAN Allegation 2**

There are some screw plugs that are used to cover counter sunk screw hole. The OD of the plug does not fit tight in the hole, creating a crevice.

Relevant Standard section: D13

**IC Ruling: The RAN concern is sustained. The fabricator acknowledged the defect was present.**

**RAN Allegation 3**

There is a fabric core material used in the black rubber diaphragms that is exposed and wicks liquid.

Relevant Standard section: C and/or D (as stated by the submitter)

**IC Ruling: The RAN concern is not sustained. The standard allows for rubber and rubber-like materials to be used as a product contact surface of the diaphragm. The fabricator stated the diaphragm material is a molded construction that utilizes a fiber reinforcement layer and is the industry standard. The potential area of exposed fiber is in a non-product area beyond the clamping point of the diaphragm.**

**RAN Allegation 4**

There is a muffler used for the exhaust air that does not comply.

Relevant Standard section: A1

**IC Ruling: The RAN concern is not sustained. The standard scope speaks only to the diaphragm pump. The Scope does not identify drive power connections or discharges as part of the document. The Working Group Technical Advisor stated that the muffler is normally sold as an accessory, add-on item by the Fabricator.**

**RAN Allegation 5**

There is a small step in the end of the small diaphragms that is lacking a radius.

Relevant Standard section: D7 and D7.1

**IC Ruling: The RAN concern is sustained. The fabricator acknowledged the defect was present.**

The IC also expressed the opinion that RAN issues in which the equipment fabricator acknowledges and concedes that the noted defect is present should not be forwarded to the IC for additional judgment.

Date received by 3-A SSI: February 26, 2013	IC Chair:  Randy Elsberry
Date Received by IC: June 1, 2013	
Date of IC Decision: July 9, 2013	Date: July 12, 2013