



3-A Sanitary Standards, Inc.
6888 Elm Street, Suite 2D
McLean, Virginia, USA 22101-3829
Phone: (703) 790-0295

**IC Ruling on RAN Submitted Against
LIAG, Laeuffer International AG
Dated 5/07/2013**

The 3-A SSI Interpretations Committee (IC) met via Conference Call on August 28, 2013 to discuss and rule on the May 7, 2013 RAN Submitted by the Dairy Grading Branch, United States Department of Agriculture (USDA). The RAN alleged multiple issues of nonconformance with the criteria of the *3-A Sanitary Standards for Plug-Type Valves for Milk and Milk Products, Number 51-01*.

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 issues requiring interpretation of the standard criteria was forwarded to the IC for resolution.

The IC made the following rulings on the RAN allegations requiring interpretation of criteria after reviewing all of the evidence from both parties, reviewing the criteria within 3-A Standard Number 51-01, and consultation with a technical expert representing the Working Group that developed the standard.

The IC expressed concern that due to the age of the standard and its out-dated presentation of criteria, the review and interpretations were difficult to conduct. The IC strongly encourages 3-A SSI to instruct the appropriate Working Group to up-date the standard as quickly as practical. **Of significant concern were section D12.1 and the words “free of pockets and crevices”.** These words imply that there cannot be any pockets and/or crevices in a nonproduct contact surface. This statement is inconsistent with current *Format & Style Manual* language (relatively free of pockets and crevices) and it is understood to be virtually impossible to fabricate a nonproduct contact surface without some crevices for proper operation. Based on this and the acknowledgement that many Standards contain similar type wording. The IC recommends that 3-A SSI and its committees be informed that the out-dated wording for nonproduct contact surfaces as presented in this standard, 51-01, and other standards be interpreted to be consistent with current 3-A language as stated in the existing *Format & Style Manual* for the fabrication of nonproduct contact surfaces.

RAN Allegation 1

Handle has crevices in the detent section that cannot be cleaned or inspected.

Relevant Standard section: D12.1

IC Ruling: The RAN concern is not sustained. The wording of the standard section was too vague to distinguish between static components, with or without gaskets, and

components, which are specifically designed to allow the valve to function properly. The features noted in the RAN concern are located on nonproduct contact surfaces which can be disassembled with simple hand tools for inspection and cleaning.

RAN Allegation 2

The housing for the handle has numerous crevices that cannot be cleaned or inspected.

Relevant Standard section: D12.1

IC Ruling: The RAN concern is not sustained. The wording of the standard section was too vague to distinguish between static components, with or without gaskets, and components, which are specifically designed to allow the valve to function properly. The features noted in the RAN concern are located on nonproduct contact surfaces which can be disassembled with simple hand tools for inspection and cleaning.

RAN Allegation 3

Phillips-head screws will collect liquid.

Relevant Standard section: D12.1

IC Ruling: The RAN concern is not sustained. When the valve is installed according to the Fabricator's Users Instructions, the Phillips-head screws are self draining and, therefore, do not constitute a pocket that will retain liquids. Proper installation requires that the handle and Phillips-head screws will be mounted vertically allowing them to drain. The features noted in the RAN concern are located on nonproduct contact surfaces which can be disassembled with simple hand tools for inspection and cleaning.

RAN Allegation 4

The shutter has an O-ring that is not easily removed for inspection or maintenance.

Relevant Standard section: D6.1

IC Ruling: The RAN concern is not sustained. The standard section D.6.1 does not require the gasket to be easily removable, only removable. The shutter assembly and gasket were demonstrated to be removable by hand with a simple hand tool (standard flat head screw driver).

RAN Allegation 5

The valves are advertised as being CIP-able but these valves are not suited for CIP cleaning. These valves would only be suited for disassembly and manual cleaning.

Relevant Standard section: D4.1

IC Ruling: The RAN concern is not sustained. 3-A standards do not address the accuracy of advertizing claims. Neither the Scope nor section D4.1 describe or limit the method of cleaning. Product contact surfaces are easily accessible for cleaning and inspection either when in an assembled position or when removed. Removable parts can be demountable by hand or by using simple hand tools, used by operating or cleaning personnel. The IC acknowledges, as with all styles of valves, that manually operated valves are not suitable for CIP cleaning. However, properly designed and documented valves equipped with automatic powered actuators are routinely CIP cleaned.

Date received by 3-A SSI May 7, 2013	IC Chair:
Date received by IC: July 25, 2013	Randy Elsberry
Date of IC Decision: August 28, 2013	Date: August 30, 2013