



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

Requester Name and Address: Gamajet Cleaning Systems, Inc. P.O. Box 626 Devault, PA 19432-0626	Standard/Practice Name and Number 3-A Sanitary Standards for Spray Cleaning Devices Intended to Remain in Place, Number 78-00
Requester Telephone No.: 610-408-9940	Criteria Paragraph Number: D10, D4.1

Specific wording requested for interpretation:

1. Based on review of a cross-section drawing and discussion with the design engineer, it was determined the construction includes a positioning pin that is press fitted. 3-A SSI noted this is a nonconformance item as the standard makes no provision for this type of permanent joint.

VRC Response: This is a nonconformance item as the standard makes no provision for this type of permanent joint.

2. The product construction includes multiple threaded screws and dome nuts fitted with seals to keep liquids out of the threads. In the judgment of 3-A SSI, such construction is not permitted under section D10.1 which states “There shall be no threads on product or solution contact surfaces.” Further, these seals and others are not designed and located to prevent associated metal-to-metal crevices. In the judgment of 3-A SSI, such construction is not provided for in the standard. At least 13 such threaded areas are shown in the cross-section drawing. Detailed engineering drawings would show more.

VRC Response: Such construction is not provided for in the standard.

3. Based on a review of engineering drawings and discussion with the design engineer, it was determined the construction does not meet the requirements for cleaning and inspectability. In the view of 3-A SSI, the dismantling of the device is more complex than for typical spray cleaning devices described in Appendix G and the construction is not “readily removable for inspection or readily inspectable in place” as required by D4.1.

VRC Response: The construction in question is not “readily removable for inspection or readily inspectable in place” as required by D4.1.

4. Two of the rotating shafts in the device are coated with chromium oxide and there is no provision in the standard for use of metal coatings. The device manufacturer states that chromium oxide is classified as an oxide ceramic and should, therefore, be permitted because Section C2.5 provides for use of ceramic materials. However, 3-A SSI maintains that C2.5 does not provide for the use of ceramic materials as a coating.

VRC Response: C2.5 does not provide for the use of ceramic materials as a coating.

5. Regarding compliance with minimum radii requirements, the manufacturer supplied data showing conformance, with one exception, for those internal radii considered to be either product or solution contact surfaces. However, the device has additional surfaces, enclosed by seals, which the company considers to be neither product or solution surfaces which do not meet the minimum radii requirements. 3-A SSI believes the standard does not provide for such an interpretation.

VRC Response: The additional surfaces, enclosed by seals, which the company considers to be neither product or solution surfaces, do not meet the minimum radii requirements.

Date Received: April 29, 2004	VCR Chairperson Signature: Randy Elsberry
Date Reviewed: May 14, 2004	
Date of Response: May 25, 2004	Date: May 25, 2004