



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

Requester Name and Address: Robert J Elbich 3486 Gun Club Rd. Nazareth, PA 18064 E-mail: relbich@exigomfg.com	Standard/Practice Name and Number: Flow Meters, Standard 28-04
Requester Telephone No.: 610.349.8458	Criteria Paragraph Number: Standard 28-04 paragraph D8.1.1

Specific wording requested for interpretation:

“D8.1.1: Where for space or functional reasons it is impossible to have a radius of 1/4 in. (6.35 mm). When for functional reasons the radius must be less than 1/32 in. (0.794 mm) in such applications as flat sealing surfaces, the product contact surface of this internal angle must be readily accessible for cleaning and inspection.”

Supporting Comments:

Prior interpretation findings defining the meaning of “such as” narrowly addressed the issue within the context of specific Standards. There has been no statement of a general nature applying these findings to all of the Standards using this phrasing.

With regard to Standard 28-04, applying the prior interpretations of “such as” to paragraph D8.1.1 addressing minimum radii essentially opens the door to zero radii corners for any design configuration.

The narrowly worded interpretations for “such as” phrasing made in interpretations dated 28 March 2005 (3-05) and 14 February 2006 (2-06) specifically apply to Standard 74- and Standard 02-, respectively. While the 14 February 2006 interpretation justification paragraphs logically imply that the dictionary meaning of the phrase is exemplary in nature, there is no statement indicating specifically that this interpretation should apply to all Standards.

Subsequently, if the same logic is applied in this case of Standard 28-, a new narrow issue will arise within paragraph D8.1.1. This paragraph makes allowances for smaller than 1/32” radii for space or functional reasons using the “such as” phrasing relating to flat sealing surfaces. Within the application of flat sealing surfaces, this allowance is entirely appropriate, however, by applying the exemplary interpretation of “such as”, the paragraph wording then opens the allowance up to permit a zero radius corner design for all applications with the only limitation that the internal angle be readily accessible for cleaning and inspection. It would appear that this result would be counter to all 3-A SSI philosophy of larger corner radii for cleanability.

To make this issue a matter of record in the broader context of all of the Standards, from the perspective of the CCE inspection activities, clarification is needed in this regard to apply a

Date of Issue: 06/10/10

general interpretation of the “such as” phrasing to all Standards until such time as each Standard has been reviewed and vetted. If the term “such as” is to be interpreted as an example throughout the 3-A Standards, then there further needs to be an interpretation, clarification, or limitation of the clause “for functional reasons”. Otherwise, this allows smaller radii and other unintended fabrication criteria at the discretion of the manufacturer in many standards.

Interpretations Committee Response:

The meaning of the term “in such applications as” appearing in Clause D8.1.1 of 3-A Standard 28-04 (*Flow Meters*) should be understood as “for example; other applications may be used when required for functionality.” Needed items not included in the listing that follows the term “in such applications as” may also have a radius of less than 1/32 in. (0.794 mm), but in such cases, the product contact surface of this internal angle must be readily accessible for cleaning and inspection.

Justification:

The IC does not take a position, or have the ability to determine, as to whether or not Clause D8.1.1 of Standard 28-04 is in error, and considers this a possibility. The IC acknowledges that Clause D8.1.1 does make allowance for radii smaller than 1/32” for functional reasons and does permit up to zero radius design for all necessary applications with the only limitation that the internal angle be readily accessible for cleaning and inspection. The IC recognizes that this lack of limitation on radius is contrary to language appearing in the *Format & Style Manual*, since this radius allowance for all necessary items deviates from generally accepted radii and this deviation is not adequately justified in the standard. Therefore, the IC recommends that this standard be reviewed by Work Group 7 (Instruments) and revised as necessary, and that this be done as soon as possible.

In reaching its decision, the IC noted that in the March 28, 2005 Official Interpretation (Number 03-05) of Clause C2.2 of Standard 74-02 (Sensors and Sensor Fittings and Connections), the IC concluded that the words “such as” were not exclusionary or not limiting in application. In the February 14, 2006 Official Interpretation (Number 02-06) of Clause D9.1.1 of Standard 02-10 (Centrifugal & Positive Rotary Pumps), the IC concluded that the meaning of the words “such as” should be understood as “for example” since the term “such as” is used in almost every 3-A Sanitary Standard, and in many cases, more than once (and sometimes multiple times) in a 3-A Sanitary Standard. It is only logical that the standard dictionary definition be followed, which means “for example” or “not limited to. The IC considers the term “in such applications as”, appearing in Standard 28-04, to be essentially equivalent to “such as”.

It should be noted that the IC’s position, as always, is that a particular “official” interpretation provided by the IC *only applies to the clause of the standard for which the interpretation was requested*. It does not apply to any other standard, or to other like clauses of other standards. Official interpretations can not be applied globally to like or similar terms appearing in other 3-A Standards.

Date Received: May 13, 2010	IC Chairperson:
Date Reviewed: June 8, 2010	Randy Elsberry
Date of Response: June 10, 2010	Date: June 10, 2010