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**IC Ruling on RAN Submitted Against  
Gamajet Cleaning Systems, Inc.  
Dated 5/08/2013**

The 3-A SSI Interpretations Committee (IC) met via Conference Call on August 28, 2013 to discuss and rule on the May 8, 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 Spray Cleaning Devices Intended to Remain in Place, Number 78-01*.

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 78-01, and consultation with a technical expert representing the Working Group that developed the standard.

**RAN Allegation 1**

There were crevices between plastic washers. Crevices are not allowed in the final fabricated form unless they are disassembled for manual cleaning. These cleaning devices are not design or suited for manual cleaning.

Relevant Standard section: D1.1

**IC Ruling: The RAN concern is sustained. The IC concluded that the small inner washer was not a bearing surface as allowed by standard section D1.6 as stated by the fabricator. The washer of concern is held static in a location that would not allow cleaning solutions to freely circulate for cleaning.**

**RAN Allegation 2**

There were crevices between plastic bushing and side walls (small bushing). Crevices are not allowed in the final fabricated form unless they are disassembled for manual cleaning. These cleaning devices are not design or suited for manual cleaning.

Relevant Standard section: D1.1

**IC Ruling: The RAN concern is not sustained. The components were concluded to be bushings. The spaces between the bushings and other components were not considered crevices as the tolerances provided were adequate to provide cleaning solution flow around and through the surfaces.**

### **RAN Allegation 3**

There were crevices between plastic bushing and side walls (large bushing). Crevices are not allowed in the final fabricated form unless they are disassembled for manual cleaning. These cleaning devices are not design or suited for manual cleaning.

Relevant Standard section: D1.1

**IC Ruling: The RAN concern is not sustained. The components were concluded to be bushings. The spaces between the bushings and other components were not considered crevices as the tolerances provided were adequate to provide cleaning solution flow around and through the surfaces.**

### **RAN Allegation 4**

There were crevices between the plastic bushing and the side wall (small bushing).

Relevant Standard section: D6.1

**IC Ruling: The RAN concern is not sustained. The components were concluded to be bushings. The spaces between the bushings and other components were not considered crevices as the tolerances provided were adequate to provide cleaning solution flow around and through the surfaces.**

### **RAN Allegation 5**

There is a crevice between the plastic bushing and the side wall (large bushing).

Relevant Standard section: D4.1 and D6.1

**IC Ruling: The RAN concern is not sustained. The components were concluded to be bushings. The spaces between the bushings and other components were not considered crevices as the tolerances provided were adequate to provide cleaning solution flow around and through the surfaces.**

### **RAN Allegation 6**

There is a 1/32" radius under the nut. A 1/8" is required in this area.

Relevant Standard section: D8.1 and D8.1.1

**IC Ruling: The RAN concern is not sustained. The underside of the nut is a bearing surface for the bushings. Section D8.1.1 allows a smaller radius for bearing surfaces.**

**RAN Allegation 7**

There is a 1/32” radius at the base of the stem. An 1/8” is required in this area.

Relevant Standard section: D8.1 and D8.1.1

**IC Ruling: The RAN concern is not sustained. The base of the stem is a bearing surface for the bushings. Section D8.1.1 allows a smaller radius for bearing surfaces.**

**RAN Allegation 8**

There are 1/32” radii at the base of the root of the gears. An 1/8” is required in this area.

Relevant Standard section: D8.1 and D8.1.1

**IC Ruling: The RAN concern is not sustained. Section D8.1.1 permits smaller radii for essential functional reasons. This area is the root of the gear where a smaller radius is needed for the essential functional reason of proper gear operation.**

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