



United States
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Agricultural
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Dairy
Grading
Branch

Room 2746-S
1400 Independence Ave., S.W.
Washington, D.C. 20250-0230

Date: August 16, 2002

Topic: Membrane CIP Systems

Numbered Memorandum PS-02-1

The *3-A Accepted Practices for the Sanitary Construction, Installation, and Cleaning of Cross Flow Membrane Processing Systems for Milk and Milk Products, Number 610-00* requires the CIP system to be automatic. Automatic cleaning and sanitizing is defined in paragraph B.10 of the document as follows:

“ . . . a programmed series of steps for cleaning and sanitizing the system that, once begun by the operator, will follow to completion without further action on the part of the operator.”

During surveys we have found systems that do not meet this requirement. Most commonly, the operator must add the cleaning compounds during the CIP cycle. This is especially true of plants that use dry chemicals.

Recently 3-A was asked to amend the practice to allow for the manual addition of cleaning compounds. Dairy Grading Branch policy has been to hold in abeyance specific provisions of a standard or practice while the 3-A committees consider the amendment. The 3-A committees are expected to consider the amendment at the May 2003 meeting. Until this issue is resolved, the absence of an automatic CIP system will not affect the status of the plant.

The intent of the requested amendment is to allow the manual addition of the cleaning and sanitizing compounds. The requested amendment would not affect other provisions of the practice, including the requirement for the membrane to be cleaned by a properly installed and operated CIP system. Therefore, the CIP system is still required to have a time/temperature recorder, automatic temperature control, properly installed pipelines, etc. (refer to *3-A Accepted Practices for Permanently Installed Product and Solution Pipelines and Cleaning Systems Used in Milk and Milk Product Processing Plants, Number 605-04*).

During plant surveys, continue to list deficiencies noted in a membrane CIP system on the report. Until the matter is resolved, CIP systems that require the manual addition of cleaning compounds or sanitizers but otherwise meet the requirements of 3-A Accepted Practice Number 605 should have an “X” in the Unsatisfactory column for Item M41 and the following statement on the survey report:

M41 3-A Accepted Practice, Number 610-00 requires an automatic CIP system.



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Plants with CIP systems that do not meet the requirements of 3-A Accepted Practice Number 605 should have the deficiency assigned as a category C in Item M41.

Also, it is important to discuss the implications of the three possible outcomes after the amendment is addressed by the 3-A committees.

1. **The amendment is rejected.** In this case all CIP systems will be required to meet the current requirements, including the automatic addition of cleaning and sanitizing compounds. Because this requirement has not changed, none of the systems currently in operation will be “grandfathered”.
2. **The amendment is accepted as written.** In this case the CIP systems that meet the requirements of 3-A Accepted Practice Number 605, but require the manual addition of cleaning and sanitizing compounds, will be acceptable and no comment will be required on the survey report.
3. **The amendment is accepted with slight modifications.** Our policy will depend on the wording in the accepted amendment.

Members of the industry that would like to have input on the amendment can join the User Group Committee by signing up online at: <http://www.3-a.org/committees/> or by contacting the 3-A Executive Secretary, Tom Gilmore, at:

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/s/ Philip S. Wolff
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