

PENNSYLVANIA LIQUOR CONTROL BOARD

Harrisburg, Pennsylvania 17124-0001

Telephone: (717) 783-9454

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Mr. Joe Duea BLM North America, LLC 4181 Grove Avenue Gurnee, IL 60031

RE: BLM2000 Beverage Line Maintenance System

Dear Gentlemen:

This office is in receipt of your letter dated January 7, 2003, wherein you request approval in the Commonwealth of Pennsylvania for the BLM2000 beverage line maintenance system. This system is intended to be used for the cleaning of coils, tap rods and connections used in drawing malt or brewed beverages in licensed establishments. Pursuant to the information that you have provided, the BLM2000 is designed to be a continuous operation to provide constant cleaning and extend the typical chemical coil cleaning cycle of seven (7) days to that of an eight (8)-week chemical coil cleaning cycle. After reviewing the specifications that you have provided, it appears that the system provides continuous cleaning by the generation of an audio signal which retards the growth of contaminant yeast and bacteria on the walls of the beer line. The system would operate on an eight (8)-week cycle as opposed to a weekly procedure.

Initially, please be advised that it is the Pennsylvania State Police, Bureau of Liquor Control Enforcement ("Bureau"), and not the Pennsylvania Liquor Control Board ("Board"), which enforces the liquor laws in Pennsylvania. This office is authorized to issue opinions to Board licensees that are binding on the Bureau. Since you are not a Board licensee, the following is offered for your information and guidance only.

Section 5.51 of the Board's Regulations indicates that coils, tap rods and connections used in drawing malt or brewed beverages in licensed establishments shall be thoroughly cleaned at least once every seven (7) days. Further, the Board's Regulations provide for the approval of the following methods of cleaning: (1) live steam; (2) hot water and soda solution, followed by thorough rinsing with hot water; and (3) another method which thoroughly cleans the coils, tap rods and connections and leaves them in a sanitary condition. [40 Pa. Code § 5.51]. Please advise that is accordance with 5.52(b), the record notation should reflect that the system is self-cleaning and chemicals are changed every eight (8) weeks as per the manufactures specifications.

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After reviewing the information provided by you, including the technical specifications of the BLM2000 beer line maintenance system, it is the opinion of this office that the cleaning system does comply with the aforementioned Board Regulations.

Should you have any further questions or concerns regarding this matter, please do not hesitate to contact this office.

Very truly yours,

FAITH S. DIEHL

CHIEF COONSEL

FRANK C. SLUZIS

ASSISTANT COUNSEL