

From: Dave O'Hara <daveo@compuweigh.com>
Sent: Thursday, December 20, 2018 1:07 PM
To: Harshman, Richard A. (Fed) <richard.harshman@nist.gov>
Cc: Hal Ecke <hal@compuweigh.com>; Robin Sax <robin@compuweigh.com>
Subject: S&T Interim Meeting

Hi Rick,

In response the changes proposed to ABW code.

We don't feel there is much added benefit to the proposed changes from our perspective.

To summarize our opinions:

Specifications:

S.1.1 – We don't see benefit or need to change the definition.

S.1.5 – We don't see benefit or need to change the definition.

S.1.7 – The general statement “no load reference values must be recorded at a point in time when there is no product flow into and out of the load receiving element” is generic and redundant. The recording of weights must be confirmed with interlocks defined in S.3. as well as the recording parameters outlined in S.2.5 of the Scale Code.

S.1.9 – We feel it is unnecessary to record the net weight of each weighment providing that the no load (empty) and loaded (full) weights are recorded. The definition of “record” would be to need further clarification.

S.3.1 – We understand that there are multiple ways to control the flow of material. The proposed changes are very generic.

We feel this needs to include provisions that when the system is in the no-flow state; That the no-flow of material is evident to the operator AND not possible with equipment conditions (interlocks).

We feel the lack of weight change at a given moment alone is NOT suitable to indicate material flow status.

S.3.2 (b) – As indicated above: This no flow condition of the material needs to be confirmed by the controlling equipment and be able to be confirmed by the operator during normal working conditions.

S.3.3 – We have no issues changing “weigh hopper” to “load receiving element”.

(b). The interference needs to be better defined. There are existing methods to ensure that a system is not adversely affected by an interference which may be temporary. To state that the system must stop, alarm and need operator intervention may not be warranted. We like the existing verbiage intent which infers that the weighing will be inhibited until the condition has been corrected.

Definition of automatic bulk weighing system – We prefer the existing definition and see no reason to remove the reference to bulk commodities or remove the reference to automatically recording these weighments which the systems do.

Advise any questions or comments.

Sincerely,

Dave O'Hara

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Director of Bulkweighing

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