

“Vermin Penetration in Materials Section” Considerations and Recommendation

Background: The initial issue defines the term “penetration of vermin” in the materials section to mean that this statement would prohibit the use of insulation type materials because they could be penetrated by vermin. However, the argument goes on to state that penetration of vermin is a fabrication issue, not a materials issue and therefore is sufficiently covered in 5.1.1. In conclusion, deleting this term in the Materials section assures that where insulation is needed, materials needed to properly insulate would not be prohibited and that 5.1.1 addresses any vermin penetration concerns.

Opposing Arguments

1. When interpreting the materials and fabrication sections of the standard, there is a distinction being drawn between what is a material issue and what is a fabrication issue, therefore removing the term from the materials section unacceptably compromises and weakens the standard.

This argument appears to have merit because, contained within the initial issue statement is a contradiction that indicates the need to keep the statement in the Materials section. On the one hand, the concern is stated that insulation type materials would allow for vermin penetration, and on the other hand it is stated that vermin penetration is a fabrication issue, not a materials issue. If materials allow for the penetration of vermin, then materials are an issue above and beyond fabrication and design.

2. The conclusion that insulation is prohibited as worded is not valid. This would seem to be correct in that prohibiting insulation has never been raised as an issue in the past. Therefore the recommendation base on the argument that it prohibits insulation is not valid or necessary.

Favorable Argument

5.1.1 is all inclusive in its interpretation. (5.1.1: Equipment shall be designed and manufactured to prevent the harborage of vermin and) If particular types of material are used in a fashion that allow for penetration of vermin, then it does not meet the fabrication criteria in 5.1.1. In other words, if material types are used in an improper manner, it is interpreted as a fabrication issue, not a material issue. The issue becomes a matter of how 5.1.1 interpreted.

The problem with this reasoning is, based on opposing comments, 5.1.1 has not been interpreted in this fashion and would therefore cause confusion and is seen as compromising.

Conclusion: Based on the inconsistencies of the original issue as presented and the validity of the opposing arguments, the term “penetration of vermin” should remain in the Materials section of the Standard.