



PENNSYLVANIA LIQUOR CONTROL BOARD

Harrisburg, Pennsylvania 17124-0001

May 10, 2007

Telephone: (717) 783-9454

FAX: (717) 787-8820

Robert Stosic
Total Systems Control, Inc.
1002 Oak Street
Large, Pennsylvania 15025
VIA E-MAIL: judy@totalsystemscontrol.com

RE: Use of Beer Line Maintenance Systems in Pennsylvania

Dear Mr. Stosic:

Your e-mail of April 27, 2007 requests clarification regarding usage of the BLM 2000 equipment in conjunction with draft beer dispensing systems.

You recently made telephone contact to this office and were provided with advice that Board Advisory Opinion No. 05-141 represents the current state of the law regarding the use of the BLM 2000 system in Pennsylvania.

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"), that enforces the liquor laws in Pennsylvania. This office is authorized to issue legal opinions to licensees of the Board which are binding on the Bureau. Since your letter does not clearly indicate that you are or represent a Board licensee, the following is offered for your guidance and information only.

Board Advisory Opinion No. 05-141, dated March 28, 2005, stated that "licensees who use the BLM 2000 system and as a result provide a chemical cleaning of their lines once every eight (8) weeks instead of once every seven (7) days will not be cited for the use of this system in that matter. Of course, licensees who fail to maintain the appropriate records or licensees whose lines are found to be unsanitary will be subject to citation in the same manner as any other licensee."

A later-issued Board Advisory Opinion (Board Advisory Opinion No. 05-569) has been read to require chemical cleaning of the beer dispensing lines once every seven (7) days regardless whether the BLM 2000 system is in use. As you requested, a copy of revised advisory opinion No. 05-569 is transmitted with this letter.

Pending the issuance of clarifying regulations, the Board and the Bureau are in agreement that Board Advisory Opinion No. 05-141 will be enforced.


Board Advisory Opinion No. 05-569 has been revised to correspond to No. 05-141. Therefore, the chemical cleaning cycle for malt or brewed beverage dispensing system supply lines may be extended to once every eight (8) weeks if the BLM 2000 system is also being used, while the Regulation in question is being amended.

Regardless of the cleaning or maintenance methods used, the licensee remains responsible to maintain the malt or brewed beverage dispensing system in a clean and sanitary condition. [40 Pa. Code § 5.54]. Records of all cleaning of the beer dispensing system must be maintained. [40 Pa. Code § 5.52].

If further information would be helpful, please feel free to contact this office.

Very truly yours,

FAITH S. DIEHL
CHIEF COUNSEL

By: 
JAMES F. MAHER
Assistant Counsel