



QC Laboratories

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Mr. Paul Hoge
Pennsylvania Department of Agriculture
Division of Milk Sanitation
2301 N Cameron Street
Harrisburg, Pennsylvania 17110

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2009 OCT -6 AM 9:57
INDEPENDENT REGULATORY BUREAU OF FOOD SAFETY
ADMINISTRATION & LAB SERVICES
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Dear Mr. Hoge

I am writing in response to the proposed regulations concerning the re-write of Chapter 59, Milk Sanitation. I have several concerns regarding wording of rules, paragraphs, and interpretation of meaning. Please do not infer that any of this is a complaint concerning the new Chapter 59. It is a very well written and badly needed document and its promulgation will be greatly appreciated.

59a.5. Standards for Pennsylvania approved dairy laboratories, official laboratories and other laboratories; reports of results

No reference is made to FDA 2400 Laboratory Series forms which are the official guidelines for laboratory practices. Additionally, if *Standard Methods for the Examination of Dairy Products* is referenced, the current edition must be mentioned and any future editions must be provided for.

59a.109. Bacterial estimate classification

(c) (1) (2). In the event of an excessive bacterial estimate, the laboratory has no control over the individual farms. Currently, the handler/Co-op is notified and they react. Additionally, they are responsible for re-sampling should retests be needed, not the laboratory.



59a.111. **Drug residue level**

- (4) How the positive sample is retained should be spelled out and the records retention should be changed to 24 months (the frequency between surveys).

59a.404 **Requirements for the issuance of a raw milk permit**

59a.407 **Regular testing of water supply**

No mention is made of cooling water used in the cooling of the raw milk. Only the water supply is mentioned, not these process waters.

I am very pleased with the results of this process and feel that the document is headed in the right direction. I ask you, however, to consider these minor changes to the proposed regulations in order to avoid any ambiguities on the laboratory side.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'John P. Pcsolar'.

John P. Pcsolar
Director, Dairy Microbiology