

**From:** Strong, Susan (CDPH-FDB) [<mailto:Susan.Strong@cdph.ca.gov>]  
**Sent:** Monday, May 21, 2012 1:26 PM  
**To:** Dolana Blount  
**Subject:** RE: California HSC Code § 114107(b)

Dear Ms. Blount,

California Retail Food Code (CRFC) Section 114107 (a) and (b) address the requirement for testing for sanitizers used for manual or mechanical ware washing. Since your product is not intended for this use, as indicated on the product label, the requirements in CRFC Section 114107 (a) and (b) are not applicable. The PURE hard surface sanitizer does meet the requirements in CRFC Section 114099.6 (b) (4) and is approved as a hard surface sanitizer in California provided that the product is used in accordance with the instructions on the product label. The product specification sheet should be available at each of your customer's retail food locations to be provided to the local environmental health enforcement agency upon request.

Sincerely,

Susan Strong, REHS  
Retail Food Program Specialist  
California Department of Public Health  
Food and Drug Branch  
916-650-6617

---

**From:** Dolana Blount  
**Sent:** Wednesday, April 25, 2012 5:26 PM  
**To:** 'susan.strong@cdph.ca.gov'  
**Subject:** California HSC Code § 114107(b)

Dear Susan:

Thank you again for your time on the phone today. As we discussed, PURE Bioscience is the manufacturer of PURE Hard Surface, a hard surface disinfectant and food contact surface sanitizer. PURE Hard Surface is registered with the US EPA and with the California Department of Pesticide Regulation as well as the 49 other US state regulatory agencies. Our product is as a ready-to-use solution intended to be used in commercial and industrial food processing and food preparation and service areas. The product is not intended for ware washing. PURE Bioscience employs strict quality guidelines that assures that no pesticide formula is packaged which does not conform with the release specification and EPA registered formula. For your review, I have attached a copy of our commercial label, a representative Certificate of Analysis (COA) and Release Specification.

In order to support our customers who wish to use our product in their facilities, we are trying to determine the applicability of California HSC Code § 114107(b) which states:

*(b)The concentration of the sanitizing solution shall be accurately determined to ensure proper dosage.*

Our customers are accustomed to working with chlorine or quaternary ammonium compounds which are diluted on site for use. These products typically have a test strip or other device which allows them to test the concentration of active after dilution. We believe that the PURE Hard Surface, as ready to use formula, meets the requirements of California HSC Code § 114107(b) when released from our facility as a finished good. A COA may be provided to the customer for reference or for support to an inspector; however, a test strip or other test method is not necessary.

Can you please review the attached documents and provide written confirmation that the COA is acceptable proof of compliance with California HSC Code § 114107(b) for a facility using PURE Hard Surface according to the label instructions?

I appreciate your assistance. Should you have any questions, please contact me directly.

Sincerely,  
Dolana Blount  
**PURE Bioscience**  
Director of Regulatory Affairs  
1725 Gillespie Way  
El Cajon, CA 92020  
619-596-8600 Ext. 105

\*\*\*\*\*

***This message is intended for the sole use of the intended recipient. The message and any files transmitted with it may contain material that is confidential and/or legally privileged. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies and attachments.***

\*\*\*\*\*