



December 24, 1996

**WARNING LETTER**  
CIN-WL-96-532

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Praful R. Patel  
Vice-President/Owner  
National Biochemicals Corp.  
1939 E. Aurora Road  
Twinsburg, OH 44087

Dear Mr. Patel:

During an inspection of your active pharmaceutical ingredient ("API", formerly referred to as bulk pharmaceutical chemical) repackaging and relabeling facility, located at 1939 East Aurora Road, Twinsburg, Ohio, on June 25-26 and July 8, 1996, our investigators documented significant deviations from the current U.S. good manufacturing practice for APIs. These deviations cause these bulk drug substances to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug and Cosmetic Act (the Act). Section 501(a)(2)(B) of the Act requires that all drugs be manufactured, processed, packed, and held according to current good manufacturing practice (CGMP). No distinction is made between APIs and finished pharmaceuticals, and failure of either to comply with CGMP constitutes a failure to comply with the requirements of the Act.

These deviations included the following:

- (1) Failure to provide adequate separation or additional controls to assure that non-penicillin drug products packaged are not subject to cross-contamination from penicillin antibiotics. The room used for repackaging all products does not have controlled ventilation, physical separation, nor are there any other verified cleaning or control procedures in place to prevent cross-contamination of other drug products with Ampicillin Trihydrate USP.
- (2) Failure to establish written procedures for repackaging and relabeling of APIs.
- (3) Failure to establish and maintain adequate batch records to control and document the repackaging and relabeling of APIs.

Batch records fail to include the quantity of containers repackaged, examples of labeling applied to the new containers, or the type of container into which the product was packaged.

- (4) Failure to assure each batch of product repackaged and relabeled has either an appropriate expiration date or retest date. For example: the manufacturers' expiration/retest dates are not always transferred to repackaged/relabeled products, and you have failed to establish stability data for the antibiotic, Ampicillin Trihydrate USP, for the new labeled storage conditions you have assigned.
- (5) Failure to store bulk pharmaceutical chemical products according to their labeled storage conditions. While you have assigned new labeling for storage conditions for Ampicillin Trihydrate USP (store at 2°C - 8°C), you fail to follow these more stringent storage conditions and you possess no data to substantiate this storage condition.
- (6) Failure to collect and maintain reserve samples of products repacked and relabeled.

Review of labeling collected during the inspection also reveals some of your bulk pharmaceutical products to be misbranded within the meaning of Section 502(a) of the Act in that the labeling is false or misleading because they are labeled "For Laboratory Use Only", but are sold for use in the manufacture of finish dosage form drug products.

Your drug products are further misbranded under Section 502(o) of the Act in that they were manufactured in an establishment not duly registered under Section 510 of the Act, and the drug products have not been listed as required by Section 510(j).

Instructions and forms for drug establishment registration and listing can be obtained at no charge by submitting a written request to: Consolidated Forms and Publication Distribution Center, Washington Commerce Center, 3222 Hubbard Road, Landover, Maryland, 20785.

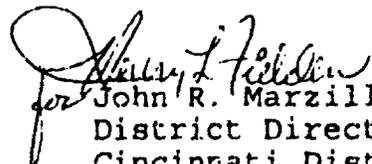
The above enumeration of deficiencies should not be construed as an all-inclusive list of violations which may be in existence concerning your drug product. It is your responsibility to ensure that all requirements of the Federal Food, Drug, and Cosmetic Act and regulations promulgated thereunder are being met. Federal agencies are advised of the issuance of all warning letters about drugs and devices so that they may take this information into account when considering the award of contracts.

We request that you take prompt action to correct these violations. Failure to achieve prompt corrections may result in enforcement action being initiated by FDA without further notice. These include seizure and/or injunction.

Please advise us in writing within fifteen (15) working days after receipt of this letter of the specific actions you have taken to correct the violations. Your response should include (1) each step that has or will be taken to completely correct the current violations; (2) the time within which corrections will be completed; (3) any reason why the corrective action is not completed within the response time; and (4) any documentation necessary to indicate correction has been achieved.

Your reply should be sent to the Food and Drug Administration, 1141 Central Parkway, Cincinnati, Ohio, 45202, to the attention of Charles S. Price, Compliance Officer.

Sincerely,

  
for John R. Marzilli  
District Director  
Cincinnati District

CSP/pjk