



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Food and Drug Administration

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Dallas District
3310 Live Oak Street
Dallas, Texas 75204-6191

April 18, 2001

Ref: 2001-DAL-WL-16

WARNING LETTER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter McCauslin, CEO
Airgas, Inc.
259 North Radnor-Chester Road
Radnor Court, Suite 390
Radnor, Pennsylvania 19087

Dear Mr. McCauslin:

During an inspection of your compressed medical gas manufacturing facility, Airgas Southwest, Inc. located at 1001-A Forest Avenue in Dallas, Texas, conducted on March 21-26, 2001, our investigator documented deviations from the Current Good Manufacturing Practice Regulations (Title 21, Code of Federal Regulations, Parts 210 & 211). A copy of the FDA-483 is enclosed. These deviations cause your drug products to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act. Specific deficiencies include:

- Failure to complete finished product testing prior to the release of drug products [21 CFR 211.165(a)]. For example:
 - 126 cylinders of Medical Oxygen USP of Lot A03M322B were released without completed identity and assay testing;
 - One container of Cryogenic Nitrogen NF of Lot A01N061D was released without completed identity testing; and
 - 4 containers of Cryogenic Nitrogen NF of Lots A01M285A, A03M297A, A03M297B, and A03M297D were released without completed leak testing.

- Failure to document that each significant step in the manufacture, processing, packing, or holding of the batch was accomplished [21 CFR 211.188]. For example:
 - Identity and assay testing was not documented for Lot A03M322B of Medical Oxygen USP;
 - Identity testing was not documented for Lot A01N061D of Cryogenic Nitrogen NF; and
 - Leak testing was not documented for Lots A01M285A, A03M297A, A03M297B, A03M297C, and A03M297D of Cryogenic Nitrogen NF.

- Failure to adequately review and approve production records prior to release and distribution of a drug product; failure to adequately investigate and document reasons for failures; failure to identify significant deficiencies; and failure to conduct reviews to determine compliance with established, approved written procedures [21 CFR 211.192]. For example:
 - Packaging and Control Records for October 27, November 9, and November 16, 2000, were never signed and dated, authorizing approval and release of Medical Oxygen USP and Cryogenic Oxygen USP.
 - Final Review of Packaging and Control Records during the time period of October 11, 2000, through March 2, 2001, failed to identify significant deficiencies prior to release and distribution of Medical Oxygen USP and Cryogenic Nitrogen NF. Significant deficiencies that occurred but were not identified included the lack of finished product testing for Oxygen USP or Cryogenic Nitrogen NF and the lack of venting of cylinders for Medical Oxygen USP.
 - The same individual conducting finished product testing authorized the release of Cryogenic Oxygen USP for distribution. Your firm's standard operating procedure, Section 2140 of Corrections/Record Inspections specifies that all lot records be reviewed and approved by a competent individual who was not previously involved in the preparation, filling, or analytical work of the lot records being inspected, prior to releasing a lot of medical gas.

- Failure to have personnel responsible for supervising the manufacture, processing, packing or holding of drug products with sufficient education, training, and experience to perform their assigned functions so as to assure that drug products have the safety, identity, strength, quality, and purity they purport [21 CFR 211.25(b)]. Specifically, the Operations Manager, who has been in this position at the facility on Forest Avenue for seven months, has not received CGMP training for drug products. This manager also has distribution authority over drug products at your facilities in Fort Worth, TX; Arlington, TX; Sulphur Springs, TX; and Athens, TX.

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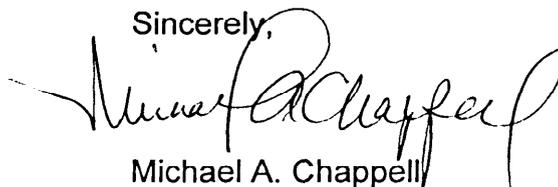
The above identification of violations is not intended to be an all-inclusive list of deficiencies at your facility. It is your responsibility to assure adherence with each requirement of the Good Manufacturing Practice Regulations. Federal agencies are advised of the issuance of all warning letters about drugs so that they may take this information into account when considering the award of contracts. Additionally, NDA, ANDA, or export approval requests may not be approved until the above violations are corrected.

We are aware of your firm's agreement to correct various deficiencies documented during the inspection. We have also received your firm's written responses dated April 3, 2001, and April 10, 2001. We would like to emphasize the necessity of documenting all significant steps in your manufacturing operations since this is your only evidence that required steps were accomplished prior to the release of your drug products. Absent such documentation, FDA can only assume that these significant steps were not accomplished and that drug products were released without adequate testing and review. We also note your firm's promises to provide increased training for the areas cited on the FDA-483. Your letter however, fails to address specific training dates, subjects to be addressed in the training, targeted audience, length of training, etc. Your letter also fails to explain the specific steps you plan to take to correct the noted deficiencies, which occur during leak testing of cryogenic containers, nor do you address specific corrections for your final review processes.

You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice. Possible actions include seizure and/or injunction.

Please notify this office in writing, within 15 working days of receipt of this letter, of the specific steps you have taken to correct the noted violations and to prevent their recurrence. If corrective action cannot be completed within 15 working days, state the reason for the delay and the time within which the corrections will be completed. Your reply should be sent to the Food and Drug Administration, Dallas District Office, Attention: Brenda C. Baumert, Compliance Officer, at the above letterhead address.

Sincerely,



Michael A. Chappell
District Director

MAC: bcb