DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

**DURING AN INSPECTION OF YOUR FIRM WE OBSERVED:**

The observations below pertain to your production of human and veterinary sterile drug products.

**OBSERVATION 1**

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile do not include adequate validation of the sterilization process.

Specifically,

a) Smoke studies showing static airflow patterns in sterile production areas do not have a documented evaluation by management. Smoke studies conducted under dynamic conditions are not documented.

b) An operator was observed on 5/12/15 producing sterile drugs (in your ISO 5 classified hood) not following procedures requiring "(b) (4) . In addition, the same operator was observed with arms resting on surfaces of the flow hoods (ISO 5) while producing sterile drugs.

c) Media fills performed by the technicians for sterile injectable human and animal drugs have not been performed under representative worst case aseptic processing conditions to assure the sterility of drug products. Your procedure for media fill is to prepare (b) (4) -(b) (4) with media for incubation. This is in contrast to the higher volume batching of at most (b) (4) -(b) (4) of sterile injectable human (b) (4) .

d) (b) (4) utilized as the primary sterilization step in producing sterile injectable human and animal drugs have not been challenged to establish upper bio-burden limits. The bio-burden of incoming

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

non-sterile active pharmaceutical components is not evaluated and limits have not been established for non-sterile active pharmaceutical formulated product ensuring sterilization steps are adequate to remove microbiological load.

**OBSERVATION 2**

Clothing of personnel engaged in the processing of drug products is not appropriate for the duties they perform.

Specifically,

a) Your employees have exposed eyes and forehead area in the clean room ("Buffer room" ISO 5 area) where sterile drug products are produced.

While cleaning, an employee was observed on 5/12/15 placing exposed forehead/eyes, and upper body, inside of the ISO 5 laminar airflow hood where sterile drug products are produced.

b) Sterile gowns, known as "bunny suits" covering the body, legs, head and arms of employees can be reused if exiting and returning to sterile drug production areas.

**OBSERVATION 3**

Aseptic processing areas are deficient regarding the system for monitoring environmental conditions.

For Example:

a) Environmental monitoring (viable, non-viable, personnel) is not conducted daily during production in areas where sterile drug products are produced. Currently, you conduct fingertip sampling (b) (4) per employee, surface microbiological sampling (b) (4), and air sampling (viables and non-viables) (b) (4). Sterile drug production occurs (b) (4)% of workdays throughout the year at your site, as management stated on 5/14/15.

b) Pressure differentials are not recorded in between rooms where sterile products are produced. Specifically not recorded are room pressure differentials from the "Buffer room" to "Ante Room". The

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

"Buffer Room" is where your site has (b) (4) ISO 5 hoods where sterile products are produced. There is no assurance that positive pressure is maintained in the buffer room during sterile drug operations.

**OBSERVATION 4**

There is a failure to thoroughly review any unexplained discrepancy whether or not the batch has been already distributed.

Specifically,

Your investigation, into positive growth found on surface contact plates dated 4/17/15, does not identify a root cause or corrective action. Positive contact plate results were obtained during routine environmental monitoring in sterile production areas.

Furthermore, this investigation does not evaluate potential trends of other positive microbial contact plates documented in the sterile production areas of your site.

**OBSERVATION 5**

Buildings used in the manufacture, processing, packing or holding of drug products are not maintained in a clean and sanitary condition.

Specifically,

a) Floors in areas where sterile drug products are produced appear to have build-up that is difficult to clean and visually evident. Additionally, there are black marks on the floor which appear to be from the tires of movable carts used in sterile production areas.

b) There is the presence of a tall chair located in the "buffer area" of the facility. This chair, which appears to be difficult to clean due to construction design and material, is located directly in front of a laminar airflow hood where sterile drug products are produced.

| | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| SEE REVERSE OF THIS PAGE | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

**OBSERVATION 6**

Each component is not tested for conformity with all appropriate written specifications for purity, strength, and quality.

Specifically,

Incoming non-sterile active pharmaceutical ingredients (API) utilized in producing sterile injectable human and animal drugs are not tested for endotoxin or microbial growth. Instead, (b) (4) prior to the API use in sterile injectable drugs. This is important because you received Acetyl-D-Glucosamine from your supplier and utilized this API in sterile animal finished batch Acetyl-D-Glucosamine 100 mg/mL, 100 mL, lot 04012015@40 which resulted in an out-of-specification value for endotoxin. You concluded the root cause of the out-of-specification to be the Acetyl-D-Glucosamine API. The process utilized by the sterile operations at your firm was not capable of preventing endotoxin from contaminating the final dosage unit. Additionally, your supplier of this API did not include endotoxin testing results on their certificate of analysis.

**OBSERVATION 7**

Written procedures are not established for the cleaning and maintenance of equipment, including utensils, used in the manufacture, processing, packing or holding of a drug product.

Specifically,

The contact dwell time for (b) (4), which is utilized as your sporicidal agent in your clean room, has not been established with support of scientific data. A technician was observed on 5/14/15 cleaning the (b) (4) ISO 5 hood in your firm's anteroom. The operator (b) (4) (b) (4) (b) (4) (b) (4) ISO 5 hood (b) (4) (b) (4), (b) (4)

**OBSERVATION 8**

Written procedures are not followed for the receipt, identification, storage, handling, sampling, testing, approval, and rejection of components, drug product containers, and closures.

Specifically,

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

Sterile vials of all sizes utilized in the production of sterile injectable human and animal drugs cannot be traced after removal from the supplier's case packaging. On 5/14/15, multiple unmarked trays of vials with no lot identification were observed in the anteroom which could not be traced to a specific lot of sterile vials.

**OBSERVATION 9**

There is no written testing program designed to assess the stability characteristics of drug products.

Specifically,

Assurance of sterility at the (b)(4) day time point for your bulk sterile components of Papaverine, Phentolamine, and Alprostadil (which are labeled to be "BUD" of (b)(4) days) are not supported by actual microbial testing results. These three components are utilized in the final human sterile injectable product Papaverine/Phentolamine/Alprostadil 30mg/1mg/20mcg/mL.

**OBSERVATION 10**

Laboratory controls do not include a determination of conformance to appropriate specifications for drug products.

Specifically,

Potency testing is not performed on any sterile injectable human and animal drugs produced at your firm. For example, there have been approximately (b) batches equaling (b)(4) vials of human Chorionic Gonadotropin 4,000 unit, (b)(4) batches of human Testosterone sterile pellet 100 mg injectable, (b) batches of animal Yohimbine 10 mg/mL, and (b)(4) batches of animal Caco-Iron-Copper 6.4 mg/mL injection produced from 1/1/15 to 5/14/15 without confirmation of potency label claims.

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

**OBSERVATION 11**

The number of qualified personnel is inadequate to perform and supervise the processing, packing, and holding of each drug product.

Specifically,

There is a lack of trained personnel on site to conduct the sterile drug production operations required. This was verified by management on 5/13/15, and evident by deficient training records for operators producing sterile drug products.

Additionally, your training records are deficient:

a) Training records for operators producing all of your sterile drug products are deficient. Specifically, 2 of (b) operators have deficient or absent sterile annual training records for the year 2014, as required. Deficiencies were observed for years 2013 and 2014. These training deficiencies are attributed by management to a lack of time to conduct training adequately.

b) Training records do not exist for conducting environmental sampling in your sterile processing areas. Lastly, there are no training records of how to read, document and interpret (b) (4) environmental monitoring results.

**OBSERVATION 12**

Written complaint records do not include, where known, the name and strength of the drug product, lot number, name of complainant, nature of complaint, and reply to complainant.

Specifically,

You do not record information regarding consumer complaints, including the name of the product, lot number, and investigations.

There is no consumer complaint records on site. Management stated on 5/14/15, that (b) (4)

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 8050 Marshall Drive, Suite 205<br>Lenexa, KS 66214<br>(913) 495-5100 Fax:(913) 495-5115<br>Industry Information: www.fda.gov/oc/industry | 05/12/2015 - 05/22/2015*<br>FEI NUMBER<br>3003718003 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Justin M. Kohll, Vice President

| FIRM NAME | STREET ADDRESS |
|---|---|
| Essential Pharmacy Compounding | 620 N 114th St |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Omaha, NE 68154-1571 | Producer of sterile drug products |

(b) (4) and no investigation into the problem is documented. Management stated that complaints arrive to your firm approximately one or two times per month. This information was not documented.

*** DATES OF INSPECTION:**
05/12/2015(Tue), 05/13/2015(Wed), 05/14/2015(Thu), 05/15/2015(Fri), 05/19/2015(Tue), 05/20/2015(Wed), 05/22/2015(Fri)

| | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| SEE REVERSE OF THIS PAGE | Eric M. Mueller, Investigator<br>Joseph R. Lambert, Investigator<br>Jenny A. Agila Sefen, Investigator | 05/22/2015 |