Temporary Compliance Waiver Notice

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In the event you are unable to read this document or portions thereof, please contact Melissa Pickworth in Division of Information Disclosure Policy, Office of Strategic Planning and Operational Policy, U.S. Food and Drug Administration, Office of Regulatory Affairs (ORA) at oraospfoiadisclosurepolicy@fda.hhs.gov
Observation 1

You have no assurance that intrathecal drug preparations prepared by your firm, such as the hydromorphone/bupivacaine 10mg/10mg/ml (preservative free) lot 06132017@6, are safe from endotoxins and sterile since you do not perform endotoxin and sterility testing. These preparations are made using non-sterile starting material such as the hydromorphone HCl lot used to prepare the hydromorphone/bupivacaine 10mg/10mg/ml (preservative free) lot 06132017@6.

Observation 2

We observed preparations and reviewed documentation for sterile drug products such as multi-use vials for intravenous infusion therapy that were prepared under the conditions listed below:

Specifically, we observed the following conditions during the sterile drug preparations of magnesium chloride hexahydrate 20 % preservative free lot 06282017@8:
1.) Commercially sterilized vials labeled to have been sterilized on 8/31/2015 with no assigned expiration date were used for this and other sterile drug preparations. You have no assurance that these glass vials remain sterile during this time period.

2.) A (b) (4) _____________________________ lot (b) (4) _____________________________ was used to sterilize (b) (4) _____________________________ ml of the magnesium chloride hexahydrate 20% lot 06282017@ 8. The manufacturer precautions were, "(b) (4) _____________________________ " The label for the (b) (4) stated, "(b) (4) _____________________________ "

3.) The (b) (4) _____________________________ unit integrity (b) (4) _____________________________ was not performed adequately since the (b) (4) _____________________________ to determine if the (b) (4) _____________________________ was functioning at the appropriate pressure as determined by the manufacturer (b) (4) _____________________________ PSI).

4.) The (b) (4) _____________________________ hood located in the ISO 8 clean room used for weighing and mixing bulk drug substances had an air conditioning filter which was not designed for this piece of equipment. We observed this filter falling onto the working surface of this hood prior to use by the pharmacy technician. We also observed that it was held in place using packing tape which was difficult to clean.

5.) The laminar flow hood (ISO 5) (b) (4) _____________________________ air vent through which first air passes had a visible stain.
Additional examples of sterile drug products for weekly IV infusion therapy over 4 weeks prepared under these conditions include:

1.) Ascorbic acid 500 mg/ml for injection²⁰⁴ ml multi dose vial lot 06082017@15, BUD 12/5/2017

2.) Vitamin B-complex injectable²⁰⁴ ml multi dose vial lot 05312017@22, BUD 8/29/2017

3.) Glutathion 200 mg/ml²⁰⁴ ml multi dose vial lot 06062017@21, BUD 11/3/2017

Observation 3

Your firm failed to perform adequate media fill studies in that they did not closely simulate aseptic operations incorporating as appropriate, worst-case activities and conditions that provide a challenge to aseptic operations.

Specifically, the most recent media fill documentation which demonstrates the ability of your pharmacy technician to prepare sterile drug preparations was performed on 12/20/16 and 1/11/17 did not include the following:
1.) Dates of media incubation
2.) Temperatures of media incubation
3.) The use of negative controls

Observation 4

Your firm does not perform environmental monitoring for microorganisms. Your are not monitoring your sterile ISO 5 laminar flow hood which is used to produce sterile drug products for intrathecal, ophthalmic, and IV infusion use:

1.) You have not performed viable air particle testing
2.) You do not perform surface testing of the laminar flow hood bench
3.) You do not test gloves or suits worn and used during the preparation of sterile drug products
Observation 5

You do not have a sporicidal agent for cleaning your ISO 5 laminar flow hood

Observation 6:

Hazardous and highly potent drugs were prepared and handled without providing adequate cleaning of work surfaces and reusable equipment such as spatulas, beakers, and (b) (4) jars to prevent cross-contamination.

Specifically, your operations include the preparation of non-sterile drug products that contain hormones such as progesterone and estriol using reusable equipment that was (b) (4) cleaned using (b) (4) a reusable sponge, (b) (4) detergent, and air drying at room temperature. Working surfaces are wiped down using (b) (4) You do not have documentation do show that these methods are effective in removing and neutralizing these drug residues. Examples of these preparations are as follows:

1.) The progesterone lot 139103 and estriol lot 1608160057 bulk drug substances were used to prepare Rx P150/Biest 1.2/testosterone 1.1cherry red troches lot 07052017@9.

2.) The progesterone lot 139103 bulk drug substance was also used to prepare Rx estradiol/ progesterone/DHEA 1.5mg/40mg/5mg cream.