OBSERVATION 1
Personnel and environmental monitoring conducted within the ISO 5 Environments on a \((b) (4)\) frequency are deficient.

Specifically, your firm does not perform growth promotion for each batch of media purchased or use a positive control when conducting\((b) (4)\) gloved finger assessment and surface sampling. Your firm conducts gloved fingertip test and surface sampling as part of the compounding personnel qualification.

OBSERVATION 2
Gowning and aseptic practices are deficient.

Specifically, during the aseptic operation for Rx \(\#\) on 7/10/19, we observed operator’s head enter the ISO 5 Laminar Airflow Workstation (LAFW) during aseptic operations with exposed skin on forehead and cheeks. In addition, operator’s skin was exposed at the ankle during aseptic operations and lower back skin was exposed during \((b) (4)\) cleaning of the ISO 7 Buffer room.

OBSERVATION 3
The firm’s cleaning and disinfecting procedure in the aseptic processing area are deficient.
Specifically, your firm uses non-sterile wipes sprayed with (b) (4) to wipe components prior to introduction into the ISO 5 Laminar Airflow Workstation (LAFW) and to clean ISO 5 LAFW counter top where the sterile drug products are prepared. On 7/10/19, during sterile compounding of Rx # (b) (6) operator was observed moving items staged on the ISO 7 buffer room storage table to the ISO 5 LAFW without first sanitizing the items with (b) (4).

In addition, your firm utilizes the following non-sterile products to clean the ISO 5 LAFW:

(b) (4)

OBSERVATION 4
Smoke study conducted on 6/21/2019 to determine unidirectional airflows in ISO 5 LAFW was inadequate.

Specifically, the smoke study failed to adequately simulate dynamic conditions and did not provide adequate coverage to demonstrate unidirectional air flow during routine operations. ISO 5 LAFW is where the firm produces all its sterile drug products.

OBSERVATION 5
Laboratory controls do not include the establishment of scientifically sound and appropriate specifications, sampling plans, and test procedures designed to assure drug products conform to appropriate standards of identity, strength, quality and purity.

Specifically, finished non-sterile drug products are not tested for the presence of microorganisms, for example: Ketoprofen 20%/Lidocaine 10%, lot no. 07419K20L10A, submitted for (b) (4) process validation sample did not include a test for the presence of microorganisms.