INSPECTIONAL OBSERVATIONS

DURING AN INSPECTION OF YOUR FIRM I OBSERVED:

OBSERVATION 1

Your firm released drug product in which the strength differs from, or its purity or quality falls below, that which it purports or is represented to possess.

Specifically, during my review of your October 2019 Formula Worksheets, (b) (4) of (b) (4), lots of products were produced using at least one expired bulk drug substance/chemical including, but not limited to the following: Phenylephrine, Desonide, Dexamethasone, Lithothionine, Acesulfame Potassium, Gabapentin and Cyclobenzaprine.

OBSERVATION 2

Calibration of mechanical equipment is not performed daily or an a routine schedule designed to assure proper performance.

Specifically,

a) You have not calibrated the scale used to weigh bulk drug substances/chemicals since you moved to this location.

b) You stated, and I observed you do not verify the weighing of ingredients/components for each lot made.

c) Formula Worksheets do not list ingredients and the quantity of each in the order of the manufacturing process.

OBSERVATION 3

You produced highly potent drugs without providing adequate to prevent cross-contamination.

Specifically, you do not document the cleaning of the (b) (4) hood and the hood used and non-dedicated equipment (i.e. (b) (4), etc.) to demonstrate control of cross contamination between highly potent drugs.

Claire M. Minden, Investigator

11/22/2019
OBSERVATION 4
Vermin was observed in your production area.

Specifically, on November 20, 2019, I observed an insect in the pharmacy area on the floor where compounding activities occur.

*DATES OF INSPECTION
11/18/2019(Mon), 11/19/2019(Tue), 11/20/2019(Wed), 11/22/2019(Fri)