

**DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 6th & Kipling St. (P.O. Box 25087) Denver, CO 80225-0087 (303) 236-3000 Fax: (303) 236-3100 ORAPHARM4_RESPONSES@fda.hhs.gov	DATE(S) OF INSPECTION 3/16/2020-3/20/2020
	FEI NUMBER 3003240654

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED  
Jennifer R. Travis, CFO/COO

FIRM NAME Front Range Laboratories, Incorporated	STREET ADDRESS 3985 S Lincoln Ave
CITY, STATE, ZIP CODE, COUNTRY Loveland, CO 80537-2531	TYPE ESTABLISHMENT INSPECTED Testing Laboratory

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:**

**OBSERVATION 1**

The accuracy, specificity and reproducibility of test methods have not been established.

Specifically, the specificity studies for the assay test methods (b) (4) "HPLC Analysis for Hydromorphone HCl" and (b) (4) "HPLC Analysis for Fentanyl Citrate or Fentanyl Injection" were inadequate in that the chromatographic separation of impurities and active peaks was not determined. The studies did not include the fortification of known impurities to test samples to optimize the separation of each component observed in the chromatograms. (b) (4) studies were performed according to document: HPLC-SOP-008, "Drug Product (b) (4) Study." The procedure was deficient in that:

- A. (b) (4) (b) (4) concentrations were not specified
- B. The exposure times for (b) (4) (b) (4) were not provided.
- C. The (b) (4) study did not follow ICH (b) (4) Stability although ICH and USP guidelines were referenced in document no.: (b) (4) "Method Selection, Validation and Verification."

The test methods were used to assay Hydromorphone HCl and Fentanyl Citrate drug products.

**OBSERVATION 2**

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile are not established and written.

<b>SEE REVERSE OF THIS PAGE</b>	EMPLOYEE(S) SIGNATURE Nayan J Patel, Investigator Walden H Lee, Chemist/Biologist	<p align="center">Nayan J Patel Investigator Signed By: 2001658919 Date Sigled 03-20-2020 16:34:35</p> <p align="center">X</p>	DATE ISSUED 3/20/2020

**DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 6th & Kipling St. (P.O. Box 25087) Denver, CO 80225-0087 (303)236-3000 Fax:(303)236-3100 ORAPHARM4_RESPONSES@fda.hhs.gov	DATE(S) OF INSPECTION 3/16/2020-3/20/2020
	FEI NUMBER 3003240654

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED  
Jennifer R. Travis, CFO/COO

FIRM NAME Front Range Laboratories, Incorporated	STREET ADDRESS 3985 S Lincoln Ave
CITY, STATE, ZIP CODE, COUNTRY Loveland, CO 80537-2531	TYPE ESTABLISHMENT INSPECTED Testing Laboratory

Specifically, airflow visualization (smoke) studies, conducted October 24, 2014, are deficient in determining the effect on unidirectional air flow as they do not include considerations for:

- A. The presence of maximum sample load and equipment within the ISO 5 classified laminar flow hood.
- B. Effect of operators working within the ISO 5 classified laminar flow hood.
- C. Maximum number of operators present within the ISO classified areas.

**OBSERVATION 3**

Input to and output from records or data are not checked for accuracy.

Specifically, a Microsoft Excel spreadsheet was used to calculate assay values from reference standard solution concentrations, sample solution concentrations and chromatographic data. The spreadsheet, "HPLC-F006.6 HPLC Sample Prep and Final Data Template," was also used to evaluate system suitability elements such as injection precision, retention time comparisons and check standard comparison for agreement with acceptance criteria. The document (b) (4), "(b) (4) (b) (4)," established a procedure by which (b) (4) were defined, administered, controlled and secured. Although the procedure referenced the document (b) (4), "Calculated/Customized Field Validation", neither the procedure nor the referenced document provided instructions for validating spreadsheets. The procedure did not include instructions to challenge the data inputs into the spreadsheet during verification. Additionally, there was no instruction for periodic assessment of the spreadsheet due to software updates or deterioration of software performance. The Excel spreadsheet was used to calculate test results obtained in the release and stability testing of Hydromorphone HCl.

<b>SEE REVERSE OF THIS PAGE</b>	EMPLOYEE(S) SIGNATURE Nayan J Patel, Investigator Walden H Lee, Chemist/Biologist	Nayan J Patel Investigator Signed By: 2001658919 Date Signed 03-20-2020 16:34:35 X	DATE ISSUED 3/20/2020

**DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 6th & Kipling St. (P.O. Box 25087) Denver, CO 80225-0087 (303) 236-3000 Fax: (303) 236-3100 ORAPHARM4_RESPONSES@fda.hhs.gov	DATE(S) OF INSPECTION 3/16/2020-3/20/2020
	FEI NUMBER 3003240654

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED  
Jennifer R. Travis, CFO/COO

FIRM NAME Front Range Laboratories, Incorporated	STREET ADDRESS 3985 S Lincoln Ave
-----------------------------------------------------	--------------------------------------

CITY, STATE, ZIP CODE, COUNTRY Loveland, CO 80537-2531	TYPE ESTABLISHMENT INSPECTED Testing Laboratory
-----------------------------------------------------------	----------------------------------------------------

X Walden H Lee  
Chemist/Biologist  
Signed By: 1300071161  
Date Signed: 03-20-2020 16:35:18

<b>SEE REVERSE OF THIS PAGE</b>	EMPLOYEE(S) SIGNATURE Nayan J Patel, Investigator Walden H Lee, Chemist/Biologist	<p align="center">Nayan J Patel Investigator Signed By: 2001658919 Date Signed: 03-20-2020 16:34:35</p> <p align="center">X</p>	DATE ISSUED 3/20/2020