DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

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:

## Quality Systems

### OBSERVATION 1

Records associated with drug product production and control and within the retention period for such records, were not made readily available for authorized inspection.

For examples:

A. Several request attempts from 06/23/10 to 06/29/10 were made to receive a complete list(s) of all rejected product batches (i.e., finished product batches, internal and external bulk product lots from the Quality Control Unit (QCU)). For examples:

   a. A list of all lots of rejected products, date and reason for rejection was requested on 06/23/10. The first (b) (4) printout was provided on 06/25/10 as a list that contains rejected batches. The (b) (4) printout contains wrong information regarding reject dates and only internal bulk (not external bulk) lots. For examples: lot (b) (4) (issue, audit and release date for this batch assignment reads 01/26/09 whereas the reject date reads 12/5/2008); lot (b) (4) (issue date - 05/14/09, audit date - 05/22/09, and release date - 05/22/09 whereas the reject date reads 06/04/2008); as well as several other lots with products listed as being rejected prior to the batch # being issued, audit date and release date.
   b. A second (b) (4) printout provided on 06/28/10 was specifically sorted for rejects relative to lot assignment numbers. The 2nd (b) (4) printout also contains inaccurate information in that lot number (b) (4) is listed as being assigned on 08/12/09, audited on 09/14/09, and released on 09/22/09. Lot (b) (4) was part of a campaign of batches and not listed as being rejected, when the campaign of batches for Product Code (b) (4) through (b) (4) were actually rejected on 12/14/09 due to a micro issue per QN (b) (4) and/or

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Anita R. Michael, Investigator<br>Sharon K. Thoma, PharmD, Investigator | 07/09/2010 |

per QN (b) (4) due to an unknown degradant OOS. The second list also contains other lots of granulation and compressed lots that were rejected, and others that were rejected but not identified as being rejected on this (b) (4) printout.

c. A third list was provided on 06/28/10 as the complete list of rejected finished product lots. Another list for finished bulk rejects was not provided until 06/29/10 for internal and external bulk.

B. Identification of new products and discontinued products were requested on 06/24/10. Discontinued products were not provided until 06/30/10 (only after requesting it at least 3 times). A list of new products since the previous inspection was not provided until 07/08/10.

C. A list or break down of all product codes was requested on 06/23/10. A finished product codes list was received on 06/24/10. On 06/24/10, a list of all product codes was again requested including granulation and compression codes, which was provided on 06/25/10, but only included product codes for internal products, (not external product codes) that are packaged by this site. In addition, the internal product codes were so small they could not be easily read. The list of external product codes was not provided until 06/29/10. MPR Indexes were provided on 06/28/10 and read in part: "***Lancaster Manufacturing Order Procedures", *** effective date 05/27/10", which provides a list of bulk granulation and compressions product codes; and "***Master Packaging Index" *** effective date 05/25/10", which provides a list of all finished product codes.

D. Organizational charts were requested on 06/23/10 and requested approximately 10 times before receiving full information on the structure/organization on 07/01/10.

E. The last two Annual Reports for (b) (4) NDA products (b) (4) were requested on 06/25/10, 06/29/10, and again on 06/30/10. Annual Reports were not received until 06/30/10 and 07/01/10.

F. The summary report for Annual Product Reviews (APR) for all Pepcid Complete products, Imodium Advance Caplets, and water testing was requested on 06/28/10 and requested to be provided on 06/29/10. On 06/29/10, the three flavors of Pepcid Complete products were provided, but included only the CAPA APR review and MAP item summary (2 pages). This was a very small portion of the entire APR summaries for all products and excluded Imodium and water APRs. Another request was made on 06/29/10. I received all APRs requested except water. The water was again requested on 06/30/10 and received on 07/06/10.

G. A list of CAPAs was requested on 06/23/10. A list of all CAPAs that went through the new (b) (4) system was received on 06/25/10; however, it did not include those CAPAs that went through the firm's old computer system. The CAPA's generated by the firm's old computer system prior to the (b) (4) system was not received until 06/29/10 only after it was requested again. On 06/28/10, the

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

firm QCU was requested to update the CAPA lists with priority status (low, medium or high) and due dates. On 06/29/10 the list was with all CAPA priorities, but did not include a complete list with due dates for those still open (as requested on 06/28/10).

H. A list of deviations, QNs and non-conformances was requested on 06/22/10. A list of QNs for laboratory (micro and analytical) was received at the end of the day on 06/22/10. All QNs were not received until 06/24/10. The entire list of QN's in (b) (4) was requested and received on 06/25/10.

I. Dissolution testing was observed on 06/24/10 and the Validation Test Method was requested regarding the mixing of the mobile phase. The test method validation for (b) (4) was received on 07/08/10. According to QCU, the person from Fort Washington was at the plant to discuss the test method validation on 06/28/10; however, this was never voiced until the end of the day on 06/28/10.

J. Test method transfer from Fort Washington to Lancaster for the Dissolution Assay of Imodium EZ Chew on (b) (4) and analyst qualification was requested on 06/24/10. The test method transfer for dissolution assay and analyst qualification was not provided until 07/01/10.

K. Filter qualification of the (b) (4) Full Flow Filter, lot (b) (4) 10 µm, used during sampling for dissolution of Imodium EZ Chewable Tablets on 06/24/10 for loss upon drug filtration and interaction with the filter was requested on 06/24/10. Filter qualification was not provided until 07/01/10 (the summary report for the filter qualification was written on 06/25/10). Chromatograms for Fort Washington testing were provided on 07/08/10, but were still not complete.

L. Maintenance logs for the HPLC unit (b) (4) and dissolution apparatus #s (b) (4) were requested on 06/22/10. QC Team leader informed me that maintenance logs are all electronic in (b) (4) but no one in the lab had access. Maintenance logs for HPLC unit (b) (4) and both dissolution apparatuses were again requested on 06/24/10. On 06/24/10, management said that if maintenance was performed on the dissolution apparatuses that it would be written in the Usage logs in the lab. All Usage Logs were requested from 2007 - 2010 for HPLC unit (b) (4) and dissolution apparatuses (b) (4) on 06/24/10. Usage logs from 2007 - 2009 were not received as of 06/28/10. On 06/29/10, the firm was waiting on retrieving the 2007 - 2009 logs from Fort Washington.

M. On 06/24/10 a request was made for the last performance qualification for the Walk-In Stability Chamber (25/60), calibration of the two front RH and TC (on the left and right inside of the chamber door) with traceability to NIST and NIST certificates. Also requested were all alarm excursions, any unplanned maintenance conducted on the chamber, and the last vendor maintenance conducted back to 01/01/09. On 06/30/10, I was provided a printout of alarms from 08/01/07 to present. I looked at the RH alarms and there were no alarms from 07/09 to present, only RH excursions from 08/01/07 to 06/10/09. Next QCU said calibrations for the four probes were available for my review. I was provided the four probe calibrations with no certificates of calibration traceable to NIST standards. The request was again made on 06/30/10 for review on 07/02/10.

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Anita R. Michael, Investigator<br>Sharon K. Thoma, PharmD, Investigator | 07/09/2010 |

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

N. On 06/30/10, I asked (b) (4) to obtain the operation manual on maintenance and Preventive Maintenance for the Stability Chamber. Stability information provided was not provided in an organized fashion on 06/30/10. I requested that the firm organize the information and bring in a computer on 07/02/10 to view the contents of (b) (4) I also requested the Walk-In Stability Chamber Operation book and the certificates for calibration of the probes for review on 07/02/10. On 07/02/10, a book was brought in with printouts of all alarm excursions; however, no computer for review of (b) (4) online and the operation book for the SC were provided until requested again on 07/02/10. Certificates traceable to NIST standards for the four probes were provided with calibrations on 07/02/10.

**OBSERVATION 2**

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

Specifically,

No Quality review was conducted concerning impact on batches that were manufactured during equipment failures. No maintenance records were completed describing what was done to fix equipment. Equipment failures were not trended by Quality to determine the scope of the manufacturing equipment failures and the overall impact on the manufacturing process and products produced. No deviation reports were generated, reviewed and approved by the firm's Quality Control Unit regarding the following manufacturing incidents:

A. For packaging Lot (b) (4) Mylanta Maximum Strength Original Flavor Liquid, consisting of manufacturing batch #s (b) (4) and (b) (4) multiple manufacturing deviations occurred as follows: During packaging of (b) (4), the capper machine crashed, and the operator's purged (b) (4) gallons of in-process product. The cooling loop failed and an additional (b) (4) gallons of in-process materials was destroyed. Leaky bottles were also observed by operators.

B. For Packaging Lot (b) (4) Mylanta Supreme RS Cherry Flavor Liquid manufacturing batch #s (b) (4) multiple manufacturing deviations occurred as follows: The line was down for issues with the labeler, no records were available describing the labeler malfunctions, and (b) (4) gallons of in-process materials were purged. In addition, due to a malfunctioning bottle cleaner there were bottles slipping.

C. For Packaging Lot (b) (4) Mylanta Regular Strength Original Flavor Liquid, manufacturing batch (b) (4), multiple manufacturing deviations occurred: the gasket blew off the elbow, the tank was shut down, and in-process materials were drained from the feed line.

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Anita R. Michael, Investigator<br>Sharon K. Thoma, PharmD, Investigator | 07/09/2010 |

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

**OBSERVATION 3**

Written records of investigations into unexplained discrepancies do not always include the conclusions and follow-up.

Specifically,

No follow-up was conducted concerning multiple and repeated product mix-up complaint investigations to determine the causes for the repeated mix-up of tablets. Investigations did not evaluate or assess the repeated product mix-up complaints reported for the same product line to determine a root cause or follow-up corrective action plan. Quality Assurance concluded that the mix up did not occur in the firm's manufacturing process for each complaint on the same product line. In addition, Quality Assurance evaluated the complaints on a lot by lot basis concluding that there were no other previous complaints reported. The investigation conducted was incomplete and did not review the repeated previous complaints observed for the same product line and similar mix-up of tablets. Complaints and investigations initiated for product mix-ups per the firm's SOP are categorized as serious events. For examples:

A. For Pepcid Complete Chewable Berry Tablets, Lot (b) (4), a consumer complained that Pepcid Complete Mint Tablets were mixed up inside the same bottle.
B. For Pepcid Complete Chewable Berry Tablet, Lot (b) (4) a consumer complained that Pepcid AC Tablets were mixed up inside the same bottle.
C. For Pepcid Complete Chewable Berry Tablets, Lot (b) (4) a consumer complained that Pepcid Complete Mint Tablets were mixed up inside the same bottle.
D. For Pepcid Complete Chewable Mint Tablets, Lot (b) (4) a consumer complained that Maximum Strength Pepcid AC 20 mg tablets were mixed up inside of the bottle.
E. For Pepcid Complete Chewable Berry Tablets, Lot (b) (4) a consumer complained that Maximum Strength Pepcid were mixed up inside the same bottle.
F. For Pepcid Complete Chewable Berry Tablets Lot (b) (4) a consumer complained that Pepcid Complete Mint Tablets were mixed up inside the same bottle.

**OBSERVATION 4**

Procedures describing the handling of written and oral complaints related to drug products are deficiently written or followed.

Specifically,

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

Per the firm's complaint procedures, an investigation of all complaints that are reported to have the same lot number should include review of prior complaints regarding the same lot number. In addition, reports of lack of effect are considered both an adverse event and product complaint. The following complaint investigations were incomplete or did not contain accurate information:

A. The following complaints were received for lot (b) (4) for Lack of Effect:
   a. Consumer Complaint # (b) (4) was received on May 15, 2009.
   b. Consumer Complaint # was received on May 26, 2009.
   c. Consumer Complaint # was received on May 26, 2009.
   d. Consumer Complaint # was received on June 30, 2009.
   e. Consumer Complaint # was received on July 23, 2009.
   f. Consumer Complaint # was received on August 07, 2009.

   In the cases listed above the Complaint Coordinator determined that there were no quality related issues that warranted a manufacturing or packaging investigation. The Quality Complaint Coordinator (QCC) determined that there were no events that would have contributed to the complaint and did not address previous complaints received against the same Lot (b) (4) The firm's (b) (4) requires that the investigation scope for all complaints shall extend to other batches of the same product that may be associated with the specific defect. The (b) (4) (b) (4) requires at a minimum that an evaluation of complaints received be conducted within the previous 12 months. Per (b) (4) QCC is to assess the need for an investigation if the complaints exceed 3 for the same LOT. This was not done.

B. The following complaints were received for lot (b) (4) for Lack of Effect:
   a. Consumer Complaint # (b) (4) was received on April 16, 2009.
   b. Consumer Complaint # was received on May 05, 2009.
   c. Consumer Complaint # was received on May 18, 2009.
   d. Consumer Complaint # was received on May 28, 2009.

   For the complaints listed above no manufacturing or packaging investigation was conducted. In addition, after receiving the 4th complaint for the same Lot (b) (4) the Complaint Coordinator documented that there were no prior related complaints against Lot (b) (4) The firm's (b) (4) (b) (4) requires an investigation for all complaints to extend to other batches of the same product that may be associated with a similar defect. The (b) (4) requires at minimum an evaluation of complaints received, within the previous 12 months. Also per (b) (4) (b) (4) QCC is to assess the need for an investigation if the complaints exceed 3 for the same

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

LOT. This was not done.

**OBSERVATION 5**

Written procedures for cleaning and maintenance fail to include description in sufficient detail of methods, equipment and materials used, description in sufficient detail of the methods of disassembling and reassembling equipment as necessary to assure proper cleaning and maintenance, and parameters relevant to the operation.

Specifically,

A. Per the firm's procedure (b) (4) annual evaluations are required to assess training, cleaning procedures and operator's abilities to execute cleaning operations effectively. Also, non-conformances require an evaluation as part of the firm's cleaning validation program and annual review. The results of the evaluation require a LN DCM committee review to determine if a CAPA is needed for follow-up. The firm's CAPA program is under remediation. In addition, a GAP assessment is required as part of the annual review. The annual review and the requirements listed above were not completed as required.

B. For cleaning validation protocol (b) (4) for the (b) (4) Tablet Press, (b) (4) did not include Imodium Plus Caplet International which contains simethicone. (b) (4) lists the simethicone based products.

C. For cleaning validation protocol (b) (4) for the (b) (4) Tablet Press the scientific rational for selecting the most difficult to clean areas or hardest to clean or dry was not included in the protocol or final report. Eight (8) swab locations were identified in the protocol with no scientific rational discussed.

D. Cleaning validation protocol (b) (4) did not include formulas (b) (4) Pepcid Complete Mint and Pepcid Complete Berry formula (b) (4) as part of the products manufacturing using the (b) (4) Blender. The cleaning validation protocols and rational consider the active or excipients for each product produced on the (b) (4) Blender. For cleaning validation protocol (b) (4) (b) (4) the scientific rational for selecting the most difficult to clean areas or hardest to clean or dry was not included in the protocol or final report. In addition, there was no scientific rational discussed for choosing the worst case product as Pepcid Complete Berry product code (b) (4)

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

## Laboratory Systems

### OBSERVATION 6

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

Specifically,

System suitability conducted for Dissolution Assay per laboratory test methods evaluates only five replicate injections for Relative Standard Deviation (RSD) NMT 3%. USP requires six replicate injections for instrument precision and accuracy. For examples: Imodium Chewable Tablet, (b) (4) dated 05/05/10; Imodium Advanced Caplets, (b) (4) dated 04/22/08; and Imodium Advanced Chewable Tablets (aka Imodium Multi-System Chewable Tablets), (b) (4) 01/30/08.

### OBSERVATION 7

Deviations from written test procedures are not justified.

Specifically,

Dissolution testing and dissolution assay for Imodium EZ Chew Tablets per (b) (4) included the following deficiencies observed on 06/24/10:

a. The analyst used the wrong tablet sequence for placement into the six dissolution vessels as follows: Tablet 1 ($V_1$) was placed into the 4th vessel rather than the 1st vessel; Tablet 2 ($V_2$) was placed into the 1st vessel rather than the 2nd vessel; Tablet 3 ($V_3$) was placed into the 2nd vessel rather than the 3rd vessel; Tablet 4 ($V_4$) was placed into the 3rd vessel rather than the 4th vessel. Tablets 5 ($V_5$) and 6 ($V_6$) were correctly placed into the 5th and 6th vessels, respectively.
b. System suitability included 5 replicate standard injections for an RSD NMT 3% rather than USP recommended 6 replicate injections for precision and accuracy.
c. Analyst used the same filter and syringe for sampling each of the 6 dissolution vessels for dissolution assay per (b) (4) with no scientific justification to demonstrate that there is no carry over of active from vessel 1 to vessel 2, vessel 2 to vessel 3, vessel 3 to vessel 4, vessel 4 to vessel 5,

and vessel 5 to vessel 6.

d. A (b) (4) mobile phase was used for the dissolution assay of dissolution samples for Imodium EZ Chew Tablets on 06/24/10. (b) (4) specifies to use a (b) (4) mobile phase mixture. (b) (4) reads in part: "*** The ratio of mobile phase components may be adjusted by (b) (4) to optimize chromatography***". Hence, (b) (4) allows for the range of (b) (4) to (b) (4) In addition, the Test Method Validation, Report (b) (4) for (b) (4) used the (b) (4) mobile phase and did not evaluate the (b) (4) mobile phase. The Test Method Validation, Report (b) (4) also reads in part: "***(b) (4) *** The ratio of mobile phase components may be adjusted by (b) (4) to optimize chromatography ***".

## OBSERVATION 8

Laboratory records do not include complete records of any testing and standardization of laboratory reference standards and reagents.

Specifically,

A. Biological Indicators for (b) (4) lot (b) (4) were observed to be stored in Refrigerator (b) (4) on 06/22/10, which is not being monitored for storage at (b) (4) RH per manufacturers' instructions.

B. Reagents were not logged into a Drying Oven Log Book and were observed on 06/22/10 in the analytical laboratory room testing area desiccator. Reagents were stored in a crucible sealed with wax parafilm. For examples:
   a. (b) (4) lot (b) (4) expiration date 03/2013, dried at (b) (4) on 06/09/08. This reagent contained a glass cover sealed with wax parafilm.
   b. (b) (4) lot (b) (4) expiration date 09/2012, dried at (b) (4) for (b) (4), no date was written on the crucible when the reagent was dried.
   c. (b) (4) lot (b) (4) expiration date 09/2012, dried at (b) (4) for (b) (4) on 05/04/09.
   d. (b) (4) lot (b) (4) expiration date 06/2012, previously dried with (b) (4) (b) (4) no date was written on the crucible when the reagent was dried.

## OBSERVATION 9

Samples taken of drug products for determination of conformance to written specifications are not properly identified.

Specifically,

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

One sample tube each for (b) (4) associated with open events were observed on the counter in the microbiological laboratory on 06/22/10 and not properly labeled with the (b) (4) ID number and date as follows:

a. LIMS ID (b) (4) dated 12/03/09.
b. LIMS ID dated 02/22/10.
c. LIMS ID dated 04/14/10.
d. LIMS ID dated 04/27/10

## Production Systems

**OBSERVATION 10**

Procedures designed to prevent objectionable microorganisms in drug products not required to be sterile are not .

Specifically,

The normal microbial flora of the facility has not been determined to date.

## Facilities & Equipment

**OBSERVATION 11**

Routine inspection of mechanical and electronic equipment is not performed according to a written program designed to assure proper performance.

Specifically,

A. There is no Preventive Maintenance program for the following equipment in (b) (4)
(b) (4)

a. Dissolution Apparatuses (b) (4)
b. (b) (4) for Rapid Resolution
c. Autotitrator
d. (b) (4) Spectrometer

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Anita R. Michael, Investigator<br>Sharon K. Thoma, PharmD, Investigator | 07/09/2010 |

e. UV/Vis Spectrophotometer

B. There is no preventative maintenance requirements written in (b) (4) for (b) (4) (b) (4) and (b) (4) for (b) (4) etc.

C. There is no written procedure approved by Quality Control Unit/Quality Assurance describing the firm's electronic (b) (4) program. For examples: (b) (4) SOP for Preventative Maintenance, Quality Notifications, Inventory Control, etc.

D. No written procedure is approved by QA describing Preventative Maintenance tasks and their frequency for completion concerning monthly tasks for the walk-in (b) (4) RH stability chamber. (b) (4) for (b) (4) (b) (4), reads in part: "***RESPONSIBILITY ***The Facilities Group is responsible for maintaining and repairing the Chamber ***The Facilities Group will coordinate all repair work and perform calibrations per the (b) (4) schedule ***". Review of the last (b) (4) of (b) (4) printout for monthly tasks completed were identified in (b) (4) as "confirmed". According to (b) (4) he gets a work order with the tasks to complete and after he confirms the work order is complete in (b) (4) he throws the work order away. Hence, there is no way in (b) (4) to identify what tasks were actually performed.

E. No written procedure describing the frequency and explicit maintenance checks to be conducted by the manufacturer of the (b) (4) RH stability chamber on a (b) (4) basis.

F. No double signature that verifies preventive and unplanned maintenance entered into (b) (4) is completed and correctly performed. Rather, double signatures indicate that tasks completed were entered into the electronic (b) (4) system versus verification that maintenance was conducted. For example, the (b) (4) RH Stability Chamber was alarming and out of specification for temperature from 02/06 - 08/10 and again on 02/11/10. A fuse was replaced on 02/08 and 11/10. This emergency entry (b) (4) was written as a (b) (4) and not entered into (b) (4) until 02/18/10 versus on 02/08/10 and 02/11/10 when the problems with the compressor/fuses were observed.

## OBSERVATION 12

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

Specifically,

Per the firm's Preventive Maintenance program the valve and valve seat are to be replaced on Homogenizers (b) (4) at least (b) (4) The valve seat and valve is involved in causing particle

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| US Customhouse, Rm 900 2nd & Chestnut St<br>Philadelphia, PA 19106<br>(215) 597-4390 Fax:(215) 597-0875<br>Industry Information: www.fda.gov/oc/industry | 06/22/2010 - 07/09/2010*<br>FEI NUMBER<br>1000150647 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Richard S. Norris, Plant Manager

| FIRM NAME | STREET ADDRESS |
|---|---|
| Johnson&Johnson Merck Consumer | 1838 Colonial Village Ln |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Lancaster, PA 17601-6700 | Human Pharmaceutical OTC Manufacturer |

disruption for suspensions. To date, the valve seats on Homogenizers (b) (4) have not been replaced since 05/23/05 and 03/24/06, respectively; the valve on Homogenizer (b) (4) has not been replaced since 2006; and there were no records available for changing the oil or replacing the filter cartridge for each of the homogenizers. The SOP for Preventative Maintenance is incomplete in that it does not describe the steps or procedures that technicians are to follow for maintenance on the Homogenizers. In addition, there were no training records available for the technicians responsible for the maintenance of the valves and seats for the homogenizers.

*** DATES OF INSPECTION:**
06/22/2010(Tue), 06/23/2010(Wed), 06/24/2010(Thu), 06/25/2010(Fri), 06/28/2010(Mon), 06/29/2010(Tue), 06/30/2010(Wed), 07/01/2010(Thu), 07/02/2010(Fri), 07/07/2010(Wed), 07/08/2010(Thu), 07/09/2010(Fri)

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
|---|---|---|
| | Anita R. Michael, Investigator<br>Sharon K. Thoma, PharmD, Investigator | 07/09/2010 |