

Allermed performs -----(b)(4)----- monograph identity test for -----(b)(4)-----
----- monograph testing is performed on -----(b)(4)---- lot of each excipient
delivered.

Water for Injection, -(b)(4)-, is generated by in-house distillation and tested --(b)(4)-- in
accordance with full -----(b)(4)----- requirements.

The -----(b)(4)----- is tested ---(b)(4)--- year for potency and identity (no other tests
performed). There are no plans at this time to remanufacture the ---(b)(4)----.

Container Closure: The container closure system for *Coccidioidin SD* uses:

- 2mL glass serum vials (14 x 32mm -(b)(4)-, Class -----(b)(4)--- glass vials with 13 mm
finish, manufactured by -----(b)(4)-----).
- Stoppers -(b)(4)- with formulation -(b)(4)- gray (manufactured by -----(b)(4)-----).
- 13 mm aluminum seal (clear lacquered one piece with center tab; manufactured by
------(b)(4)-----).

Copies of the formulation of the -(b)(4)- glass and elastomeric stopper were provided for
the vials and stoppers. Further, a letter of authorization from -----(b)(4)-----
----- to allow FDA access to their DMFs for production of the glass vials and elastomeric
stoppers are included. Solvent loss testing and sterility (container integrity) tests were performed
(shown in Validation 1034).

Method of Manufacturing:

------(b)(4)-----

| <u>Component</u> | <u>Specification</u> | <u>SOP</u> |
|------------------|----------------------|------------|
| -(b)(4)- | -(b)(4)- | -(b)(4)- |
| -(b)(4)----- | --(b)(4)-- | -(b)(4)- |
| -(b)(4)----- | -----(b)(4)----- | -(b)(4)- |
| -(b)(4)- | ---(b)(4)--- | -(b)(4)- |
| -(b)(4)---- | -----(b)(4)----- | -(b)(4)- |

------(b)(4)-----

Two (2) Pages Determined to be Non-Releasable: (b)(4)

----- (b)(4) -----

Stability of the final product

The stability of the final product was evaluated during a -(b)(4)- period. The parameters that were assessed were visual clarity, pH, sterility, and potency as well as sodium chloride, sodium borate, and phenol concentrations. Final containers were stored in upright and inverted positions at -(b)(4)- and 2 – 8 °C. The results of the studies showed that the product was extremely stable since the composition and potency did not change significantly during storage at ----(b)(4)--- for -(b)(4)- months and during storage for -(b)(4)- months at 2 – 8 °C. Based on these data, at least a 36 month expiration dating period would be appropriate for this exceedingly stable product.

----- (b)(4) -----

----- (b)(4) -----

The Sponsor’s Responses to CBER’s August 4 Letter

In CBER’s August 4 letter, the sponsor was asked to address the following product-related issues.

1. In the validation report for the *Coccidioidin SD* identity test, -(b)(4)- antigens are used as negative controls. However, in the SOP for the identity test, --(b)(4)-- antigens -----(b)(4)----- are listed. Please comment on this difference and describe the source of the -----(b)(4)-----.
2. In the Inter-assay studies of the identity test, the -(b)(4)- readings for *Coccidioidin SD* Lot -----(b)(4)----- are significantly different on days 1, 2 and 3. Please comment on the impact of the significant variability in -(b)(4)- readings may have on the performance of the identity test.
3. Please describe how the 95% confidence interval for the potency test was determined and submit data to the BLA supporting this confidence interval calculation.
4. For the relative potency studies, please clarify why the acceptance criteria within a lot is defined as -----(b)(4)-----

