DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
158-15 Liberty Avenue Jamaica, NY 11433 (718) 340-7000 Ext:5301 Fax:(718)662-5661 ORAPHARM1_RESPONSES@fda.hhs.gov	9/6/2023-9/19/2023* FEI NUMBER 3010943533

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Alfonse J. Muto, Co-Owner	
FIRM NAME Pine Pharmaceuticals, LLC	STREET ADDRESS 355 Riverwalk Pkwy
CITY, STATE, ZIP CODE, COUNTRY Tonawanda, NY 14150-5837	TYPE ESTABLISHMENT INSPECTED Outsourcing Facility

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 I OBSERVED:

OBSERVATION 1

The quality control unit lacks the responsibility and authority to approve and reject all in process materials and drug products.

Specifically,

A. Your firm did not provide scientific justification as to why your drug product "EPI-CAINE 0.025%-0.75% INJ (1ML) SDV", lot# (b) (4), which is documented to have "all other defects" (specification (b) (4) result 3 %), did not necessitate investigation to identify root cause. "All other defects" is identified in the batch record to include critical product quality defects such as visible particulate (5 units), and seal defect (11 units). Lot# (b) (4) was released on 11/22/2022.

B. On 6/15/2023, your firm released blended drug product "TROPI-PHEN (b) (4) OPHTH SOL (15 mL) Lot# (b) (4) Exp. 10/25/2023 that failed 200% VI, 1st and 2nd AQL inspections after updating procedure "MWA-030, Rejection and Acceptance - (b) (4) " to change the defect category of particulate matter from critical to major without providing scientific justification.

C. Your firm lacks adequate acceptance criteria for critical rejects found during visual inspection processes. Your firm has no scientific justification for moving to a *2nd* 100% VI when your 1*st* 100% and AQL fails. Your Quality Unit has released multiple batches where critical defects such as particulate matter have been found without proper identification. There is no assurance that these lots are free from further particulate matter. For examples, (b) (4) lots of multiple products that

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Tekalign Wondimu, Investigator	X Tekalign Wondimu Investigator Signed By: Tekalign Wondimu -S Date Signed: 09-19-2023 13:08:55	9/19/2023

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
158-15 Liberty Avenue Jamaica, NY 11433 (718) 340-7000 Ext:5301 Fax:(718)662-5661 ORAPHARM1_RESPONSES@fda.hhs.gov	9/6/2023-9/19/2023* FEI NUMBER 3010943533

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Alfonse J. Muto, Co-Owner	
FIRM NAME	STREET ADDRESS
Pine Pharmaceuticals, LLC	355 Riverwalk Pkwy
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Tonawanda, NY 14150-5837	Outsourcing Facility

are currently within expiry, were released without adequate acceptance criteria.

OBSERVATION 2

There is a failure to thoroughly review the failure of a batch or any of its components to meet any of its specifications whether or not the batch has been already distributed.

Specifically,

A. Your firm failed to conduct a thorough investigation into the possible root cause(s) of defective units uncovered during visual inspection. Your firm released your blended product "LIDO-PHEN 1%-1.5% (1ML) SDV" Lot# (b) (4) which failed two 100% visual and AQL inspections after a third 100% and AQL inspection was conducted with a passing result. Lot (b) (4), exp. 12/12/2023, was deemed free from defective units and suitable for release. Lot# (b) (4) was released on 8/17/2023.

B. Your firm failed to conduct adequate investigations relating to complaints COMP-2022-3212, COMP-2022-3290, COMP-2022-3313, and COMP-2022-3314 received for released product Epi-Caine 0.025%-0.75% INJ (1ML) SDV. Your firm confirmed particulate matter in 1 unit of your retains; however did not further identify the particulate.

C. During the February 2023 recertification, your firm had a HEPA filter leak test failure in one of the LAFHs (b) (4) (b) (4) Serial# (b) (4)). There was no deviation or investigation initiated to assess product impact. In addition, your firm does not have a procedure in place to evaluate HEPA filter failures or patches nor product impact on items that are potentially affected. There

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Tekalign Wondimu, Investigator	X Tekalign Wondimu Investigator Signed By: Tekalign Wondimu -S Date Signed: 09-19-2023 13:08:55	9/19/2023

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
158-15 Liberty Avenue Jamaica, NY 11433 (718) 340-7000 Ext:5301 Fax:(718)662-5661 ORAPHARM1_RESPONSES@fda.hhs.gov	9/6/2023-9/19/2023* FEI NUMBER 3010943533

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Alfonse J. Muto, Co-Owner	
FIRM NAME Pine Pharmaceuticals, LLC	STREET ADDRESS 355 Riverwalk Pkwy
CITY, STATE, ZIP CODE, COUNTRY Tonawanda, NY 14150-5837	TYPE ESTABLISHMENT INSPECTED Outsourcing Facility

were (b) (4) lots of compounded drug products produced in (b) (4) (b) (4) between (b) (4) (the last HEPA filter certification) and (b) (4) when the leaks were discovered.

OBSERVATION 3

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile are not followed.

Specifically, on September 7, 2023, during the production of "BEVACIZUMAB 1.25MG/0.05ML INJ - SCLS MN" lot# (b) (4), your production technician ((b) (6), (b) (7)) was observed touching (where their sterile sleeve was resting on) the ISO-5 classified area work surface LAFH ((b) (4) Serial #: (b) (4)). According to your procedure *SOP-134 Aseptic Environmental Monitoring Plan*, no PM sampling is obtained from operator sleeves during production.

OBSERVATION 4

Personnel were observed conducting aseptic manipulations where the movement of "first air" in the ISO 5 area is blocked or disrupted.

On September 14, 2023, during production of "BEVACIZUMAB 1.25 mg/0.05 ML INJ- NJ TB" in the ISO 5 classified (b) (4) air flow hood ((b) (4), Serial #: (b) (4)), the setup or placement of (b) (4) Syringe Filler ((b) (4)) and the sterile syringe allowed technician ((b) (6), (b)) to block first pass air when making sterile connections.

OBSERVATION 5

Production areas have difficult to clean or contain porous, particle generating, or visibly dirty equipment or surfaces.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Tekalign Wondimu, Investigator X Tekalign Wondimu Investigator Signed By: Tekalign Wondimu -S Date Signed: 09-19-2023 13:08:55	9/19/2023

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
158-15 Liberty Avenue Jamaica, NY 11433 (718) 340-7000 Ext:5301 Fax:(718)662-5661 ORAPHARM1_RESPONSES@fda.hhs.gov	9/6/2023-9/19/2023* FEI NUMBER 3010943533

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Alfonse J. Muto, Co-Owner	
FIRM NAME Pine Pharmaceuticals, LLC	STREET ADDRESS 355 Riverwalk Pkwy
CITY, STATE, ZIP CODE, COUNTRY Tonawanda, NY 14150-5837	TYPE ESTABLISHMENT INSPECTED Outsourcing Facility

Specifically, the ISO-5 LAFHs, have difficult to clean electrical and gas outlets located within the inner side of the ISO-5 hood, adjacent to the critical compounding surface.

OBSERVATION 6

Smoke studies were inadequately performed under dynamic conditions.

Specifically, air visualization studies ("smoke studies") performed in your ISO 5 classified (b) (4) airflow hood (b) (4), Serial #: (b) (4) demonstrates that smoke is flowing upward and in a back current above the ISO-5 hood, forming eddies where the air seemed to recirculate above the operators head.

OBSERVATION 7

Your outsourcing facility did not submit a report to FDA identifying the drugs compounded during the previous six month period.

Specifically, the following products were compounded and not identified on your report submitted on June 2023:

- Epinephrine 4 mg/250mL
- Epinephrine 5 mg/250mL
- Epinephrine 8 mg/250mL
- Norepinephrine 4 mg/250mL
- Norepinephrine 8 mg/250mL
- Norepinephrine 16 mg/250mL
- Phenylephrine HCl 20 mg/250mL
- Phenylephrine HCl 25 mg/250mL

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Tekalign Wondimu, Investigator	X Tekalign Wondimu Investigator Signed By: Tekalign Wondimu -S Date Signed: 09-19-2023 13:08:55	9/19/2023

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
158-15 Liberty Avenue Jamaica, NY 11433 (718) 340-7000 Ext:5301 Fax:(718)662-5661 ORAPHARM1_RESPONSES@fda.hhs.gov	9/6/2023-9/19/2023* FEI NUMBER 3010943533

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Alfonse J. Muto, Co-Owner	
FIRM NAME Pine Pharmaceuticals, LLC	STREET ADDRESS 355 Riverwalk Pkwy
CITY, STATE, ZIP CODE, COUNTRY Tonawanda, NY 14150-5837	TYPE ESTABLISHMENT INSPECTED Outsourcing Facility

- Phenylephrine HCl 40 mg/250mL
- Phenylephrine HCl 50 mg/250mL
- Vasopressin 0.2U/mL in NS 100mL
- Vasopressin 0.4U/mL in NS 100mL

***DATES OF INSPECTION**

9/06/2023(Wed), 9/07/2023(Thu), 9/08/2023(Fri), 9/11/2023(Mon), 9/12/2023(Tue), 9/13/2023(Wed), 9/14/2023(Thu), 9/15/2023(Fri), 9/18/2023(Mon), 9/19/2023(Tue)

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Tekalign Wondimu, Investigator X Tekalign Wondimu Investigator Signed By: Tekalign Wondimu -S Date Signed: 09-19-2023 13:08:55	9/19/2023

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
158-15 Liberty Avenue Jamaica, NY 11433 (718) 340-7000 Ext:5301 Fax:(718)662-5661 ORAPHARM1_RESPONSES@fda.hhs.gov	9/6/2023-9/19/2023* FEI NUMBER 3010943533

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Alfonse J. Muto, Co-Owner	
FIRM NAME	STREET ADDRESS
Pine Pharmaceuticals, LLC	355 Riverwalk Pkwy
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Tonawanda, NY 14150-5837	Outsourcing Facility

Annotations to Observations

Observation 1: Not annotated

Observation 2: Not annotated

Observation 3: Not annotated

Observation 4: Not annotated

Observation 5: Not annotated

Observation 6: Not annotated

Observation 7: Not annotated

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Tekalign Wondimu, Investigator X Tekalign Wondimu Investigator Signed By: Tekalign Wondimu -S Date Signed: 09-19-2023 13:08:55	9/19/2023

The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or
2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgment, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."