DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
300 River Place, Suite 5900 Detroit, MI 48207 (313) 393-8100 Fax:(313) 393-8139 Industry Information: www.fda.gov/oc/industry	10/21/2013 - 11/05/2013* FEI NUMBER 3010450840

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Kenny R. Walkup Jr., President

FIRM NAME	STREET ADDRESS
Specialty Medicine Compounding Pharmacy, P.C.	350 S Lafayette St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
South Lyon, MI 48178-1814	Producer of Sterile Drug Products

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

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

Specifically

A. Adequate validation of aseptic processing operations, specifically, process simulations (media fills), have not been performed under worst case processing conditions to assure that aseptic processing techniques ensure the sterility of drug products. To date, media fills (aseptic technique assessments), have consisted of each operator drawing media into one syringe and [redacted] (b) (4) it directly into a closed bag containing sterile media. Examples of aseptic processing operations include:
   i. During production of Dextrose 50% injectable, 25 open 50 ml vials are routinely lined up in the ISO 5 hood. A [redacted] (b) (4) connected to a needle is manually held over the top of each vial, and product is dispensed via an automated pump. Vials are manually stoppered after all vials are filled.
   j. During production of Methylcobalamin UD/PF 25mg/mL injectable, the bulk solution is [redacted] (b) (4) into a bulk stoppered vial. After a passing sterility test result for the bulk solution is received, the solution can be drawn into unit dose syringes multiple times over multiple days in the ISO 5 laminar flow hood.

B. The environmental & personnel monitoring program is deficient:
   i. Personnel monitoring is not performed every shift or from multiple locations. Routine monitoring is limited to finger touch plate samples collected once per month.
   ii. No passive (settle plates) or active viable air monitoring is performed during routine production. Active air monitoring is only performed in the ISO 5 laminar flow hoods and ISO 7 cleanroom approximately every [redacted] (b) (4) during cleanroom HEPA certification.
   iii. The frequency of viable surface monitoring is inadequate. It is currently performed approximately [redacted] (b) (4) in each of the ISO 5 laminar flow hoods, and monitoring of the ISO 7 cleanroom has not been performed routinely. A new procedure to conduct surface sampling of the ISO 7 cleanroom every [redacted] (b) (4) was implemented resulting in data first reported on or about 10/17/13.
   iv. Non-viable particulate (NVP) monitoring is not performed during routine production. It is only performed approximately every [redacted] (b) (4) during cleanroom HEPA certification.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Jeffrey D. Meng, Investigator Michele L. Forster, Investigator Michele L. Forster	11/05/2013

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
300 River Place, Suite 5900 Detroit, MI 48207 (313) 393-8100 Fax:(313) 393-8139 Industry Information: www.fda.gov/oc/industry	10/21/2013 - 11/05/2013* FEI NUMBER 3010450840

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Kenny R. Walkup Jr., President

FIRM NAME	STREET ADDRESS
Specialty Medicine Compounding Pharmacy, P.C.	350 S Lafayette St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
South Lyon, MI 48178-1814	Producer of Sterile Drug Products

C. Adequate documentation was not provided to support that air pattern analyses (smoke studies) of the ISO 5 laminar flow hoods are performed under dynamic conditions representative of aseptic processing operations to ensure uniform air flow over exposed product and materials. An air pattern smoke test is performed during the semi-annual HEPA certification of the ISO 5 laminar flow hoods. No video of this is maintained. Air pattern analysis of the ISO 7 buffer room, where the laminar flow hoods are located, has not been performed.

D. Gowning components worn by operators for aseptic processing are not all sterile. Examples of non-sterile gowning components include the hair covers, surgical masks, and tyvek suit. After gowning, exposed skin includes areas around the eyes, forehead, ears and neck.

E. Appropriate storage conditions and clean hold times for sterilized containers, closures, and utensils have not been established. For example, once sterilized in the autoclave, bags of stoppers and vials can remain in the unclassified laboratory space for an indeterminate amount of time prior to entry into the ISO 7 prep room. Potential opportunities for microbial ingress during this time have not been evaluated or mitigated.

Example sterile injectable products produced in the cleanroom include Dextrose 50% injectable lots 07222013@24, 07232013@5, 07252013@5, and 07302013@32.

OBSERVATION 2

Equipment and utensils are not cleaned, maintained, and sanitized at appropriate intervals to prevent contamination that would alter the safety, identity, strength, quality or purity of the drug product.

Specifically,

A. The HEPA filter grate cover for ISO 5 laminar flow hood #1 was observed with what appeared to be residues and rust-like spots. This grate cover is not cleaned during regular cleaning of the laminar flow hood, and no cleaning or maintenance frequency is specified for this grate.

B. Filter Integrity (leak) Testing has not been performed for the HEPA filters supplying the ISO 7 cleanroom (prep, ante, and buffer rooms) which were installed in 01/2013. Only non-viable particulate monitoring of these HEPA filters for the ISO 7 rooms is performed every [redacted] (b) (4).

C. The pressure differential between the ISO 5 laminar flow hoods and the ISO 7 cleanroom is not monitored continuously. Hood #2 has no pressure gauge for routine monitoring, and hood #1 is monitored [redacted] (b) (4).

D. Disinfectant efficacy studies have not been performed to assess the effectiveness of sanitization agents and procedures, methods of application, surface materials, and contact times for equipment and materials used in aseptic operations. For example, materials transferred from the prep room to the buffer room are wiped or sprayed with [redacted] (b) (4) prior to placement in the pass-through.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Jeffrey D. Meng, Investigator Michele L. Forster, Investigator	11/05/2013

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
300 River Place, Suite 5900 Detroit, MI 48207 (313) 393-8100 Fax:(313) 393-8139 Industry Information: www.fda.gov/oc/industry	10/21/2013 - 11/05/2013* FEI NUMBER 3010450840

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Kenny R. Walkup Jr., President

FIRM NAME	STREET ADDRESS
Specialty Medicine Compounding Pharmacy, P.C.	350 S Lafayette St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
South Lyon, MI 48178-1814	Producer of Sterile Drug Products

Example sterile injectable products produced in the cleanroom include Dextrose 50% injectable lots 07222013@24, 07232013@5, 07252013@5, and 07302013@32.

OBSERVATION 3

There are no written procedures for production and process controls designed to assure that the drug products have the identity, strength, quality, and purity they purport or are represented to possess.

Specifically,

A. Documentation was not provided to support that the vial washing and [redacted] (b) (4) processes are adequate to sufficiently remove endotoxins. Vials are currently first washed in a tub of [redacted] (b) (4) For example, clear 50 mL glass vials with lot #1211230159 were used during production of Dextrose 50% injectable lot 07222013@24.

B. Documentation was not provided to support that the [redacted] (b) (4) used for container/closures and finished drug products are adequately validated. Chemical indicators are currently placed in every [redacted] (b) (4) and a biological indicator (BI) is placed in the bottom of the [redacted] (b) (4). However, worst case load configurations and BI placement to account for worst case [redacted] (b) (4) locations have not been evaluated. The [redacted] (b) (4) is operated at [redacted] (b) (4) for container/closures and a [redacted] (b) (4) for finished drug products. In addition, periodic calibration of the [redacted] (b) (4) is not performed.

For example, clear 50 mL glass vials with lot #1211230159 were washed and [redacted] (b) (4) prior to use during production of Dextrose 50% injectable lot 07222013@24.

OBSERVATION 4

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

Specifically,

A. The sterility test method performed in-house (e.g. for Dextrose 50% injectable lots 07222013@24, 07232013@5, 07252013@5, and 07302013@32) is not scientifically sound in that:
   i. The testing is not performed on finished products. For example, Dextrose 50% injectable in 50mL vials is [redacted] (b) (4) from the bulk formulation directly into the QI Medical sterility test kit. At this time, the product has not yet been exposed to processing conditions such as individual vial filling, stoppering, etc.
   ii. Method suitability studies using representative organisms in the presence of product have not been performed.
   iii. Prior to approximately 9/26/13, sterility testing did not include the use of media suitable to detect the presence of anaerobic bacteria, for example, fluid thioglycollate media.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Jeffrey D. Meng, Investigator Michele L. Forster, Investigator	11/05/2013

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
300 River Place, Suite 5900 Detroit, MI 48207 (313) 393-8100 Fax:(313) 393-8139 Industry Information: www.fda.gov/oc/industry	10/21/2013 - 11/05/2013* FEI NUMBER 3010450840

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Kenny R. Walkup Jr., President

FIRM NAME	STREET ADDRESS
Specialty Medicine Compounding Pharmacy, P.C.	350 S Lafayette St
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
South Lyon, MI 48178-1814	Producer of Sterile Drug Products

B. Samples sent for sterility testing at a contract laboratory are not always representative finished product containers. For example, for Methylcobalamin UD/PF 25mg/mL injectable lot 07112013@3 packaged into 0.3mL syringes, the sample sent for sterility testing is a vial obtained during [redacted (b) (4)] of the bulk stock. After passing sterility results are received, this bulk stock is drawn into the unit dose syringes and no further testing is performed.

C. Not all lots of sterile injectable products are tested for endotoxins, for example, Dextrose 50% injectable lots 07222013@24, 07232013@5, 07252013@5, and 07302013@32.

D. No documentation was provided to support that container closure integrity testing has been performed to ensure that sterile drug product remain sterile through labeled beyond-use-dates (BUDs). For example, Dextrose 50% injectable lot 07222013@24 in 50 mL vials had a BUD of 90 days.

OBSERVATION 5

Testing and release of drug product for distribution do not include appropriate laboratory determination of satisfactory conformance to the identity and strength of each active ingredient prior to release.

Specifically,

Not all lots of sterile injectable drug products produced are tested for identity and potency prior to release and distribution. For example, Dextrose 50% injectable lots 07222013@24, 07232013@5, 07252013@5, and 07302013@32, and Methylcobalamin 25mg/mL lot 09052013@6.

OBSERVATION 6

An adequate number of batches of each drug product are not tested to determine an appropriate expiration date.

Specifically,

Not all sterile drugs produced with extended BUDs are tested for stability. For example, no stability study has been conducted for Dextrose 50% injectable in 50 mL vials. Lots 07222013@24, 07232013@5, 07252013@5, and 07302013@32 were produced and distributed with a 90 day BUD.

*** DATES OF INSPECTION:**
10/21/2013(Mon), 10/22/2013(Tue), 10/24/2013(Thu), 11/05/2013(Tue)

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
	Jeffrey D. Meng, Investigator Michele L. Forster, Investigator Michele L Forster	11/05/2013