DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
6th & Kipling St. (P.O. Box 25087) Denver, CO 80225-0087 (303) 236-3000 Fax:(303) 236-3100 Industry Information: www.fda.gov/oc/industry	07/28/2014 - 08/11/2014* FEI NUMBER 3010894019

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Darby C. Brown, Owner/President/CEO

FIRM NAME	STREET ADDRESS
Brown's Compounding Center, Inc.	13796 Compark Blvd. # 100
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Englewood, , CO 80112	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

Aseptic processing areas are deficient regarding the system for monitoring environmental conditions.

Cleanroom Certification conducted by contractor [redacted] (b) (4) in June/July of 2014 indicate microbial failures in ISO 5 hoods where sterile filling of product occurs. Your firm continued to produce in these hoods without sufficient frequency of environmental monitoring to assure an acceptable operating condition.

There are no written procedures or criteria for assuring pressure differentials between the aseptic processing room and adjacent rooms. When observed, the pressure in the Aseptic Room (ISO 7) where filling occurs was 0.13 inches water gauge, with the adjacent Vial Washing Room at 0.14 (ISO 8). The pressure of the ISO 7 Aseptic Room is not shown positive to all adjacent rooms. Also, the pressure differential of the pass room/box area separating the filling room from a common hallway is not known or monitored. No documentation of pressure differentials is recorded during sterile production or otherwise.

Viable active air monitoring is scheduled to be performed only [redacted] (b) (4) and not during each daily production shift. Likewise, non-viable particulates are not monitored during each production shift, but are measured per a [redacted] (b) (4) schedule. The measurement of microbial contamination on work surfaces in the ISO 5 area is only scheduled to be performed [redacted] (b) (4) as well, and is not associated with daily sterile production. Personnel monitoring is not conducted on employees during aseptic filling operations. Microbiological personnel surface samples (such as fingers, forearm, chest, etc.) are not taken with association of sterile drug production at all. The only surface monitoring of employees is conducted during [redacted] (b) (4) where gloved hands are tested using contact plates.

OBSERVATION 2

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile do not include adequate validation of the sterilization process.

There are [redacted] (b) (4) of sterile filling performed on-site. One is a sterile fill into [redacted] (b) (4) [redacted] (b) (4). This method has a Media Fill program to simulate. The other filling method involves [redacted] (b) (4) [redacted] (b) (4) This latter method for simulating the sterile filling of

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Betamethasone Inj does not have a Media Fill performed.

Also, there are no established procedures for conducting documented smoke studies (e.g., review/conclusion whether acceptable) under dynamic conditions in order to show proper design and control in preventing turbulence and stagnant air in aseptic processing areas.

There are no written procedures for stopper cleaning (conducted manually), nor are stoppers (used in the sterile filling of Betamethasone Injection) being tested for endotoxins.

The water produced from your [redacted] (b) (4) has not been sampled and tested/analyzed, and there is no established monitoring program for this water manufacturing. Validation of this manufacturing process has not been performed. There is no documentation to show that this water is not a microbiological and endotoxin source. Water of unknown quality from this system is used to wash vials and stoppers used as containers/components in sterile filling of Betamethasone Injection.

OBSERVATION 3

Control procedures are not established which monitor the output and validate the performance of those manufacturing processes that may be responsible for causing variability in the characteristics of in-process material and the drug product.

Validation for the sealing process of plastic bags used in the packaging of materials for autoclave sterilization was not performed. Prior to autoclaving, stoppers and vials are placed into plastic bags and then sealed with a twist tie. There is no documented evidence that this process can produce a seal effectively so that packaged items remain sterile as they are taken from the [redacted] (b) (4) Neither has seal (package) integrity testing been performed. These vial and stopper components are used in the sterile filling of Betamethasone Injection.

OBSERVATION 4

The written stability program for drug products does not include reliable, meaningful, and specific test methods.

There is analytical data to support the potency of drugs produced, but analytical methods used for assay analyses of drugs are not validated (i.e., the accuracy, sensitivity, specificity, and reproducibility of test methods have not been established), neither is sterility nor endotoxin testing performed at the claimed shelf life to support the expiration dating.

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OBSERVATION 5

Reports of analysis from component suppliers are accepted in lieu of testing each component for conformity with all appropriate written specifications, without performing at least one specific identity test on each component and establishing the reliability of the supplier's analyses through appropriate validation of the supplier's test results at appropriate intervals.

Drug components are accepted based on the manufacturer's certificate of analysis (C of A), and no testing by your firm has been conducted to verify the reliability of the C of As. There is no sampling and testing of incoming materials, drugs, and drug product containers and closures. Only informal evaluation and review, such as a cursory examination of Certificates of Analysis, is conducted.

*** DATES OF INSPECTION:**
07/28/2014(Mon), 07/29/2014(Tue), 07/30/2014(Wed), 07/31/2014(Thu), 08/06/2014(Wed), 08/11/2014(Mon)

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