OF HEALTH AND HUMAN SERVICES AND DRUG ADMINISTRATION
DATE(S) OF INSPECTION
7/16/2019-8/1/2019*
FEI NUMBER 3012465222
STREET ADDRESS
1125 Hollipark Dr
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

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

Specifically,

A) On 07/18/2019 during the production of(b) (4) 2mg/0.05mL for Injection, the "Pharmacist in Charge" was observed taking a fingertip sample from a gloved hand that was still wet following disinfection with sterile <sup>(b) (4)</sup>, before production began.

B) During review of your "Finished Product Sterility Testing" records which includes both environmental and personnel monitoring data from 11/30/2017-05/13/2019, approximately <sup>BUG</sup> samples taken from inside the ISO5 LAFH were positive for growth. For example:

1) 11/30/2017 touch plate was positive for growth.

2) 12/04/2017 settling plate was positive for growth.

3) 06/11/2018 touch plate was positive for growth.

4) 08/17/2018 settling plate was positive for growth.

5) 10/19/2018 (positive for growth, plate type not identified)

No action was taken per SOP 08-004 "Environmental Monitoring-Microbial" and no alert level is established to prevent the possible contamination of sterile drug products (**This is a repeat observation from a previous inspection**).

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FORM FDA 483 (09/08)	PREVIOUS EDITION OBSOLETE	INSPECTIONAL OBSERVATIONS	PAGE 1 of 6 PAGES

OF THIS PAGE	DISTRICT ADDRESS AND PHONE	FOOD AND	DRUG ADMINISTRAT	AN SERVICES	
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Robert A. Myers , PhD.RPh, President       InterActions       InterActions         RAM Pharma, Inc       1125 Hollipark Dr         GMEMARSHOME COMMY       InterActions       InterActions         C) The system for routine environmental monitoring of your classified zones, such as surface sampling, is currently conducted on (b) (4) in the LAFH and following (b) (4) cleaning as described in SOP 0         001. However, prior to 02/02/2019 no records could be provided that demonstrates a specific sampling plan utilized for all ISO classified rooms beyond (b) (4) viable air sampling.       D) Non-viable air sampling is not conducted during production (This is a repeat observation from a previou inspection).         E) The (b) (4) into room (b) (4)", an unclassified room utilized during the production of sterile drug products, does not undergo routine environmental monitoring.         F) Alarm systems to monitor for potential breaches in air quality are currently not employed.         OBSERVATION 2         Procedures designed to prevent microbiological contamination of drug products purporting to be steri did not include adequate validation of the aseptic and sterilization process.         Specifically,         Set REVERSE OF THIS PAGE         Demonstrates Process         Non-viable air sampling.         Dimensional monitoring.         F) Alarm systems to monitor for potential breaches in air quality are currently not employed.         OBSERVATIO	Bothell, WA 9	98021		FEI NUMBER	
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RAM Pharma, Inc       1125 Rollipark Dr         Off.EALL, 2000, Cooking       Intellipark Dr         Idaho Falls, ID 83401       Outsourcing Facility         C) The system for routine environmental monitoring of your classified zones, such as surface sampling, is currently conducted on (b) (4) in the LAFH and following (b) (4) cleaning as described in SOP 0         001. However, prior to 02/02/2019 no records could be provided that demonstrates a specific sampling plan utilized for all ISO classified rooms beyond (b) (4) viable air sampling.         D) Non-viable air sampling is not conducted during production (This is a repeat observation from a previou inspection).         E) The (b) (4) into room (b) (4)", an unclassified room utilized during the production of sterile drug products, does not undergo routine environmental monitoring.         F) Alarm systems to monitor for potential breaches in air quality are currently not employed.         OBSERVATION 2         Derecuture validation of the aseptic and sterilization process.         Specifically,         SEE REVERSE         Bryan L Mcguckin, Investigator       Immension         Bryan L Mcguckin, Investigator       Immension         8/1/2019       Immension		rs , PhD.RPh, President			
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FORM FDA 483 (09/08) PREVIOUS EDITION OBSOLETE INSPECTIONAL OBSERVATIONS · PAGE 2 of 6 PA	Procedures designed in the second sec	gned to prevent microbiologica adequate validation of the asept EMPLOYEE(S) SIGNATURE	tic and steriliza	tion process.	

	OF HEALTH AND HUMAN SERVICES AND DRUG ADMINISTRATION
DISTRICT ADDRESS AND PHONE NUMBER 22215 26th Ave SE Suite 210 Bothell, WA 98021 (425)302-0340 Fax:(425)302-0404	DATE(S) OF INSPECTION 7/16/2019-8/1/2019* FEI NUMBER 3012465222
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED Robert A. Myers , PhD.RPh, President	
FIRM NAME	STREET ADDRESS
RAM Pharma, Inc	1125 Hollipark Dr
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Idaho Falls, ID 83401	Outsourcing Facility

A) SOP 11-006 (b) (4) Validation" was updated and implemented on 07/02/2019 to include a biological indicator. However, there is no documentation to establish load mapping studies have been conducted.

B) Your firm has not validated any depyrogenation process for sterile glassware used in the production of "High-Risk" sterile drug products.

C) Your firm is using preservatives for sterile products produced as "multi dose". However, there is no data to establish products using said preservatives have been tested to demonstrate efficacy. (This is a repeat observation from a previous inspection).

## **OBSERVATION 3**

Aseptic processing areas are deficient regarding the system for cleaning and disinfecting the equipment to produce aseptic conditions.

Specifically,

On 07/18/2019 during the production of(b) (4) 2mg/0.05mL for Injection, I observed the use of sterile wipes rendered non-sterile having been left open on top of the LAFH for an unknown period prior to production. These wipes were subsequently used to clean inside the ISO5 zone and to clean equipment introduced into the ISO5 zone throughout production.

# **OBSERVATION 4**

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Bothell, WA 9			FEI NUMBER 3012465222			
(425) 302-0340	Fax: (425) 302-0404					
NAME AND TITLE OF INDIVIDUAL	TO WHOM REPORT ISSUED					
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RAM Pharma, I		TYPE ESTABLISHME	lipark Dr			
Idaho Falls,	ID 83401	Outsourci	ng Facility			
There is no writt Specifically,	en testing program designed to as	ssess the stabi	lity characteristics o	f drug products.		
All stability data f	or your sterile products was request re "Technical Reports" which your		25			
A) Data provided	supports sterility testing; no potency	testing was co	nducted.			
	udies were either not conducted or da or potency altered under such condition	1	d that demonstrates the	ere are no degradant		
C) Not all product	ts have data to support the use of ext	ended BUD's.				
the second state of the second s	N 5 ug product purporting to be pyro such requirements.	gen-free is no	t laboratory tested to	determine		
Specifically,						
	e drug products reviewed undergo st g products are tested to ensure they a			or to release. However,		
1. Dexamethasone 400mcg/0.1 Injection, Lot #: 201804091 was not tested for endotoxin prior to distribution.						
SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Bryan L Mcguckin, Investig	ator	Brywn L. Mogachin Investigator Synad Gyr Dynn X Dain Signad: 69-0	DATE ISSUED 8/1/2019		
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Bothell, WA 98021	FEI NUMBER			
(425)302-0340 Fax: (425)302-0404	3012465222			
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED				
Robert A. Myers , PhD.RPh, President				
FIRM NAME	STREET ADDRESS			
RAM Pharma, Inc	1125 Hollipark Dr			
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED			
Idaho Falls, ID 83401	Outsourcing Facility			
Idaho Falls, ID 83401       Outsourcing Facility         2. Lidocaine 1%/Phenylephrine 1.5% Solution PF, Lot #: 201806111 was not tested for endotoxin prior to distribution.         (This is a repeat observation from a previous inspection).				

# **OBSERVATION 6**

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,

Your firm does not conduct potency testing for any finished drug products prior to distribution. For example:

<ol> <li>Ephedrine sulfate 5mg/mL</li> </ol>	. Injection-5mL Syringe,	Lot #: 201810191	& Lot #: 201903132	was distributed
without potency data.				

2) Methylcobalamin 5mg/mL Injection Solution MDV, Lot #: 201901312 was distributed without potency data.

3) Dexpanthenol 250mg/mL Injection Solution MDV, Lot #: 201902012 was distributed without potency data.

(This is a repeat observation from a previous inspection).

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Bryan L Mcguckin,	Investigator	Bryen I Mogodan Innesigator Signed By: Bryen L. Mogachin -S Dain Signed: 66-01-2019 14:30:07 X	DATE ISSUED 8/1/2019
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	FOOD AND DRUG ADMINISTRATION	
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Bothell, WA 98021	FEINUMBER	
(425)302-0340 Fax: (425)302-0404	3012465222	
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED		
Robert A. Myers , PhD.RPh, Presid	lent	
FIRM NAME	STREET ADDRESS	
RAM Pharma, Inc	1125 Hollipark Dr	
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED	
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### **OBSERVATION 7**

Written records are not always made of investigations into unexplained discrepancies.

Specifically,

You firm has not established alert levels or initiated investigations into repeated microbial incursions into the ISO5 classified zone. From 11/30/2017-05/13/2019 approximately 15 microbial incursions were reported in your ISO5 LAFH. No action was taken until 12/05/2018 with the initiation of CAPA Report #: 2018-001. Incursions into the ISO5 LAFH continued after completion of the investigation conducted for CAPA Report #: 2018-001, for example:

1) 03/01/2019 touch plate positive for growth.

2) 05/13/2019 touch plate positive for growth.

No follow up investigations have been conducted to determine the cause of continued microbial incursions into the ISO5 LAFH.

**\*DATES OF INSPECTION** 

7/16/2019(Tue), 7/17/2019(Wed), 7/18/2019(Thu), 7/19/2019(Fri), 7/22/2019(Mon), 7/23/2019(Tue), 8/01/2019(Thu)

SEE REVERSE OF THIS PAGE	EMPLOYEE(S)SIGNATURE Bryan L Mcguckin, In	vestigator Brent Mogucin Bigned By: Brent Mogucin -S Date Signed: 08:01-2019 14:3007 X	DATE ISSUED 8/1/2019
FORM FDA 483 (09/08)	PREVIOUS EDITION OBSOLETE	INSPECTIONAL OBSERVATIONS	PAGE 6 of 6 PAGES