DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
6751 Steger Drive Cincinnati, OH 45237-3097 (513) 679-2700 Fax:(513) 679-2772 Industry Information: www.fda.gov/oc/industry	06/23/2015 - 09/14/2015* FEI NUMBER 3009988995

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Raymond R. Carlson, Owner

FIRM NAME	STREET ADDRESS
RC Compounding Services, LLC	3030 Center Rd
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Poland, OH 44514-2158	Sterile Drug Producer

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

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

Specifically:

a. Processing methods for the sterilization of injectable drug products include (b) (4) and/ or (b) (4) Sterilization methods have not been validated for any of the drug products and there is no documentation of the qualification of the (b) (4) (b) (4) that is used. Injectable drugs that are processed via (b) (4) include Hydroxyprogesterone caproate. Injectable drugs that are processed via (b) (4) include Dexamethasone, Vancoymcin and Trimix.

b. Injectable drug products such as Dexamethasone, Vancomycin and Trimix are sterilized via (b) (4) . There is no documentation to support that the (b) (4) are (b) (4) (b) (4) On 8/12/15 I observed (b) (4) being used for the sterilization of a topical ophthalmic product; the (b) (4) were not (b) (4) (b) (4)

c. Dexamethasone 400 mcg/0.1 mL, a sterile, preservative-free injectable for intravitreal administration, is manufactured in batch sizes of approximately (b) (4) The batch is maintained in a (b) (4) under refreigerated conditions. The firm distributes the product in 1 mL syringes both as a single ingredient product and in combination with Avastin. The entire (b) (4) batch is (b) (4) . The (b) (4) (b) (4) (b) (4) No studies have been performed to support this practice. Simiarly, a single batch (b) (4) of Trypan Blue 0.1% ophthalmic solution is (b) (4) with no supporting studies.

d. The method used to clean, sterilize and depyrogenate vials, stoppers, and caps that are used as container/closure systems for sterile injectable drug products has not been validated. There is no documentation of the qualification of the (b) (4) (b) (4) that is used. Drug products I observed being packaged into container/closure systems that had been processed in this manner include Trimix and Hydroxyprogesterone caproate.

e. Media fills performed by personnel working in the ISO 5 area do not closely simulate actual production, or cover the most challenging conditions and manipulations. Media fills are (b) (4) of (b) (4) (b) (4) which include (b) (4)

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(b) (4) . Actual practices include the following: (b) (4) The number of vials and/or droptainers filled can be in excess of (b) (4) units.

f. The (b) (4) (b) (4) (b) (4) that is used to sterilize (b) (4) is (b) (4) (b) (4) . I observed the (b) (4) (b) (4) in an unclassified area where (b) (4) . The (b) (4) (b) (4) was open to ambient air. Additionally, the (b) (4) (b) (4) (b) (4) to sterilize (b) (4). The firm has no limit to the (b) (4) (b) (4) , (b) (4) There is no scientific data to support this (b) (4)

OBSERVATION 2

Clothing of personnel engaged in the manufacturing of drug products is not appropriate for the duties they perform.

Specifically:

a. Personnel working in the ISO 5 and immediately surrounding ISO 7 classified area (b) (4) . This (b) (4) involves hanging the sterile garb on hooks in the ISO 7 anteroom (b) (4) . As hung, the gowning comes into contact with a non-sterile wall and is directly in the pathway to an unclassified area. Additionally, (b) (4) includes the hood with integrated mask/mouth covering and the outer boots/shoe covers. There is (b) (4) No studies have been performed to support this practice.

b. Sterile gowning is (b) (4) sampled for microbial contamination with (b) (4) (b) (4) during sterile drug manufacturing operations. Sample sites include arms and chest. The sterile gowning is not subsequently removed from use; the gowning remains in use for an (b) (4)

OBSERVATION 3

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

Specifically,

a. Environmental monitoring of the ISO 5 areas (laminar flow hood and (b) (4) is not performed each day that sterile drug products are produced.

b. Operators in the ISO 5 area are not monitored each day that sterile drug products are being produced.

c. Pressure differentials in the ISO 5 and surrounding classified areas are not being monitored when sterile drug products are being produced.

d. The (b) (4) to the ISO 5 (b)(4) and they are not included in the environmental monitoring program.

OBSERVATION 4

Each batch of drug product purporting to be sterile and pyrogen-free is not laboratory tested to determine conformance to such requirements.

Specifically,

a. There is no data to support that the in-house test method being used for the sterility testing of drug products provides accurate and reliable results. Injectables (to include intrathecals) and ophthalmic topical drug products that are being tested in-house for sterility include, but are not limited to, the following: Hydromorphone; Hydromorphone/Baclofen; Baclofen; Morphine; Ceftazidime; Cefuroxime; Trypan Blue; and Lidocaine:BSS:Epi.

b. Endoxtin testing is not routinely performed on sterile injectable drug products.

OBSERVATION 5

There is no written testing program designed to assess the stability characteristics of drug products.

For example, there is no stability data to support the BUDs for the following preservative-free injectables as packaged:

- Avastin, 90 day BUD/ refrigerated; 3/10 mL insulin syringe
- Cyanocobalamin, 90 day BUD/ refrigerated; 1 mL syringe
- Vancomycin, 45 day BUD/ freezer; 1 mL tuberculin syringe
- Dexamethasone 60 day BUD/ refrigerated; 1 mL tuberculin syringe

OBSERVATION 6

Aseptic processing areas are deficient regarding systems for maintaining any equipment used to control the aseptic conditions.

Specifically, there have been no dynamic smoke studies performed to evaluate the unidirectional airflow of the ISO 5 areas (laminar flow hood and (b) (4) the clean room, or the ante-room.

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OBSERVATION 7

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

Specifically:

a. Firm personnel use a (b) (4) (b) (4) to sterilize (b) (4) (b) (4). The sterile (b) (4) is then placed in non-sterile spray bottles and used as a disinfectant for the ISO 5 areas (laminar flow hood and (b) (4)), and as a disinfectant for sterile drug compounding activities to include wiping down supplies and equipment for transfer into the ISO 5 areas and as a glove disinfectant.

b. The firm does not sterilize the (b) (4) that is used as a disinfectant in the clean room.

c. The firm uses a (b) (4) solution as a sporocidal agent for the ISO 5 (laminar flow hood) and clean room floor, ceiling, and shelving units. The firm has no scientific data to support the concentration and contact time being used result in sporocidal disinfection.

OBSERVATION 8

Buildings used in the manufacture, processing, packing, or holding of a drug product do not have the suitable construction to facilitate cleaning, maintenance, and proper operations.

Specifically, there are no air returns on the walls in the ISO 7 areas (clean room and anteroom). Air exits both ISO 7 areas from (b) (4) Staging of materials and equipment for sterile drug production takes place in the (b) (4) activities such as the weighing of non-sterile APIs for use in sterile drug products occur in the (b) (4)

OBSERVATION 9

Routine calibration and checking of equipment is not performed according to a written program designed to assure proper performance.

a. Specifically, the (b) (4) (b) (4) and (b) (4) (b) (4) that are used for the sterilization of drug products, and for the sterilization and depyrogenation of equipment and container/closure systems used in the manufacture of sterile drug products have not been qualified for use, nor are they routinely calibrated to ensure the reliability of the processing temperatures and, as applicable, pressures.

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b. (b) (4) Incubators used for the incubation of media to detect microbial contamination of drug products, as well as the incubation of media used in the environmental monitoring and media fill programs, have not been qualified for use, nor are they routinely calibrated and/or monitored with calibrated thermometers to ensure temperature reliability.

c. The pressure gauges used to monitor room pressure differentials are not calibrated.

*** DATES OF INSPECTION:**
06/23/2015(Tue), 08/03/2015(Mon), 08/04/2015(Tue), 08/05/2015(Wed), 08/06/2015(Thu), 08/12/2015(Wed), 08/13/2015(Thu), 08/14/2015(Fri), 09/11/2015(Fri), 09/14/2015(Mon)