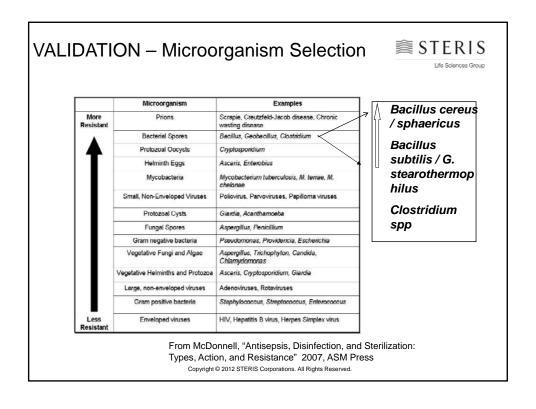
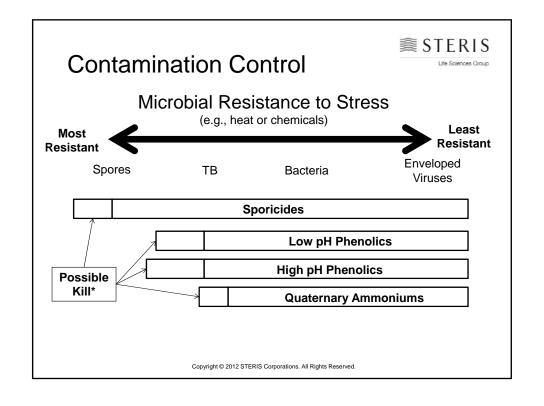


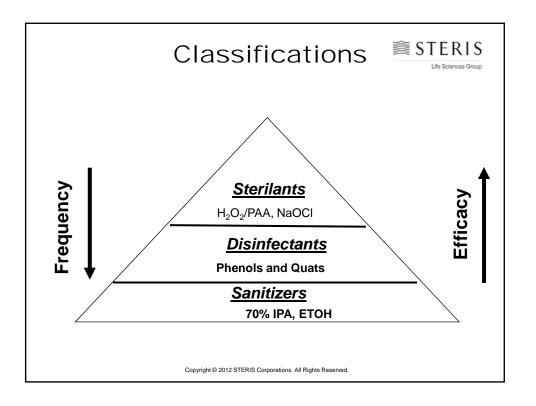
# Agenda



- Current Industry Trends
  - ➤ Cleaning and Disinfection
  - Current Warning Letters & Industry Guidance







# Disinfectant components



Component Function in disinfectant

Water

Solvent

Solvents

Solubilization and stabilization

AntimicrobialsOxidants

Kill, reduce microbes Oxidize, kill microbes

Chelants

Tie up Calcium, Iron, Stabilize

oxidants,

Potentiate antimicrobial action

Bases

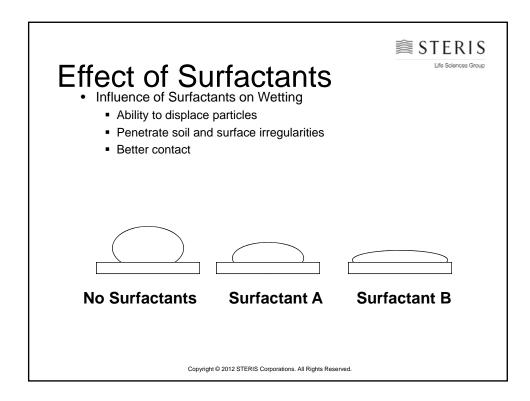
Alkalinity source (NaOH, KOH)

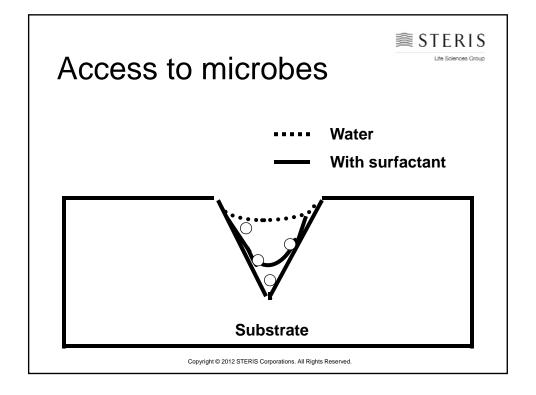
Acids

Acidity source (HCI, Phosphoric Acid)

Surfactants

**Emulsification, Wetting** 





# Molds common to cleanrooms and coldrooms



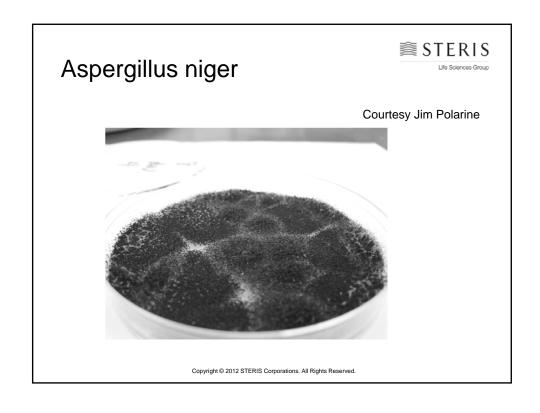
- Aspergillus species
- •Penicillium species
- Stachy bottrus
- Candida albicans
- Cladosporium
- Mucor
- Scopulariopsis
- Trychophyton

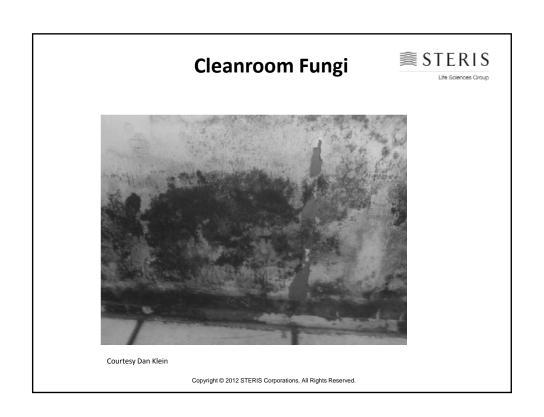
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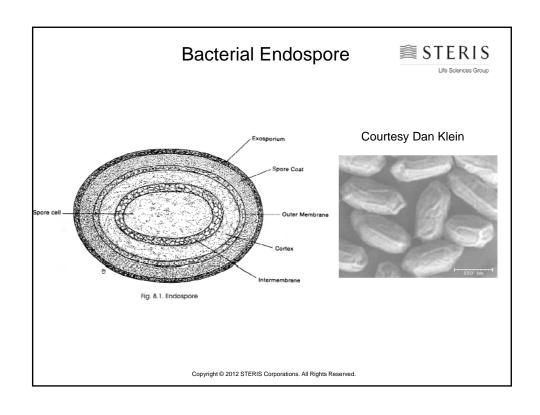
# **Bacterial Spores in Operations**



- •Bacillus subtilis
- •Bacillus cereus
- •Bacillus pumilus
- •Bacillus licheniformis
- •Bacillus sphaericus
- •Bacillus thuringiensis
- •Paenibacillus polymyxa
- •Geobacillus
- •Clostridium difficile









# **STERIS**

# **New Mopping Systems**

- The Mop King (http://www.amking.com/mopking.htm)
- The Micron Swep (http://www.youtube.com/watch?v=qTWaYQIX2I <u>Y</u>)

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# STERIS

Application Techniques  Life Sciences Croup
☐ Most critical areas to least critical areas
<ul> <li>Apply disinfectant to wiper or spray on the surface (garden variety sprayer)</li> </ul>
☐ Changing out the use dilutions (2-3 Bucket Routines) ref. Anne Marie Dixon
<ul> <li>✓ 600 square feet (56 square meters) in ISO-5 (Grade A &amp; B)</li> <li>✓ 1,000 square feet in (93 square meters) ISO-6, 7, 8 (Grade C &amp; D)</li> </ul>
☐ Grid (Blueprint of the Room)
☐ Pull and lift
☐ Overlapping strokes (by 20%)
☐ Figure 8 (also called figure S) or Unidirectional mopping strokes
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# STERIS ■ STERIS

# Two Bucket System

- Sterilant (Disinfectant) in front bucket, optional to put some sterilant (Disinfectant) in waste bucket (bucket beneath the ringer)
- ☐ Dip mop head into front bucket, let excess liquid drain off, apply to the surface.
- ☐When mop head appears to be dragging on the surface, dip into waste bucket, then wring out. Go back to front bucket and dip mop head, let excess liquid drain off and apply to the surface.
- ☐ Repeat above steps
- ☐ Other Mopping Systems: Single Bucket, Triple Bucket, MicronSwep System by Aramark.

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# Two and Three Bucket Systems $_{\text{\_STERIS}}$

Life Sciences Group





Courtesy Perfex Corp.

### Cleanroom Curtain Devices



### Surfaces

- Floors
- Walls
- Isolators
- Lyopholisers
- Cabinets
- Tanks
- Curtains/Softwalls



Courtesy Micronova Mfg.

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# Bucket Systems & Sterile Lines STERIS





- Adaptable
- Resistant
- Dedicated



### Courtesy Micronova Mfg.



# Mop Heads for Cleanrooms







Courtesy Micronova Mfg.

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### Spills and Leaks



- Disinfectant applicator
- Choice of widths
- Universal
  - Floors/Walls
  - Large/small areas





Courtesy of Micronova Mfg.

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# **Commonly Used Equipment**













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# Sprayers and Foamers



### **Acid Sprayer**

• Compatible with oxidizers, phenolics, quats, and other acids

### Cart

· Carts designed for 5 gal pail

### Sanitation Sprayer

- Sprayer Attachment
- Has rinse cycle

### Foam Master

• Plant Air powered







# **Controlled Areas**

- · Hallways and Floors ---Mop daily ---Rinse as needed
- Walls and Ceilings---Mop monthly—Rinse as needed
- Equipment (carts, racks, trash receptacles, etc.)---Wipe weekly---Rinse as needed
- Rinsing is based on visual observation and safety.

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### Class 100000 - D



Life Sciences Group

### Class 100,000 Closed Processes - Recommendations

(solution prep, fermentation, purification, media prep, wash bays, raw material weigh area, stopper prep, packaging inspection)

Surface	Method	Cleaning Agent	Frequency	Rinse	
Floors     around drains     foot traffic paths     spill areas     access ports	тор	high-level disinfectant with surfactants	daily at shutdown, between process changeover	not necessary	
Walls, Ceilings • general	wipe, mop	high-level disinfectant with surfactants followed with sporicide	monthly	not necessary	
doors, handles, high-traffic areas	тор	high-level disinfectant with surfactants	daily		
Equipment     adjacent to access ports	spray, wipe	high-level disinfectant	daily during processing	as needed to remove	
surface upstream airflow path to process opening	spray, wipe	with surfactants	weekly	residue buildup	
Other Surfaces	wipe	high-level disinfectant with surfactants	daily	not necessary	

### Class 10000 - C



Life Sciences Group

### Class 10,000 - Outside Laminar Flow Hoods, Rooms, and Halls - Recommendations

Surface	Method	Cleaning Agent	Frequency	Rinse	
Floors • normal traffic paths	man.	high-level disinfectant with surfactants	daily after transfers	not necessary	
<ul> <li>proximity to open process or transfer areas</li> </ul>	тор	high-level disinfectant with surfactants followed by a sporicide	weekly or monthly, if necessary		
Walls • general	wipe	high-level disinfectant with surfactants followed by a sporicide, if necessary	weekly or monthly	not necessary	
• door plate	тор	high-level disinfectant with surfactants	daily		
Equipment • shelving • portable tanks • processing items	spray or wipe	high-level disinfectant with surfactants	before and after use	WFI rinse as necessary to address residue buildup	
• carts (wheels)		sporicide		buildup	
Furniture and Other spray or wipe		high-level disinfectant with surfactants	daily	not necessary	
<ul> <li>chair (wheels)</li> </ul>		sporicide			

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### Class 100 - A & B



Life Sciences Group

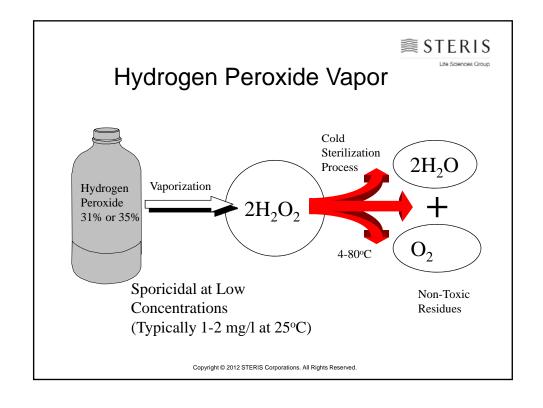
### Class 100 – Laminar Flow Hoods and Aseptic Filling Suites – Recommendations

Surface	Method	Cleaning Agent	Frequency	Rinse	
External Hoods  • back, sides, top	wipe	sterile high-level disinfectant with surfactants	daily		
door, silding panel		sterile high-level disinfectant with surfactants	daily	not necessary	
	wipe	sporicide	weekly or In response to microbial monitoring		
Inside Hood or Curtain  • work surface  • sidewalls		sterile high-level disinfectant with surfactants	daily, preuse and postuse	WFI as necessary in product contact	
apparatus/critical surfaces	wipe	sporicide	weekly or In response to microbial monitoring		
• curtains		sterile high-level disinfectant with surfactants	dally	aréas, or to address residue buildup	
	wipe	sporicide	weekly or in response to microbial monitoring		
Adjacent Flooring and Walls		sterile high-level disinfectant with surfactants	dally, between lots and shifts		
	mop	sterile high-level disinfectant with surfactants followed by a sporicide, as necessary	weekly or in response to microbial monitoring	not necessary	

# Sporicidal Agent Application ✓ Rationale ✓ Spore control vs. chemical exposure ✓ Corrosivity and Irritation

# Application Frequency Sporicidal agent Rationale Weekly Monthly Quarterly Should be written in SOP's

# Alternative Technique □ Foaming □ VHP □ Spraying (also known as fogging) ✓ Aerosolizes disinfectant □ Fumigation ✓ Vaporizes disinfectant □ Full immersion ✓ Disinfectant soak



# **Room Decontamination**



Walk-In Refrigerator Type

Construction

Oklahoma Medical Research Foundation, Oklahoma City, OK



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# Fogger / Dynafogger

- ✓ Room Size
- ✓ Effectiveness
- ✓ Material Compatibility
- ✓ Contact Time
- ✓ Re-entry Time



Courtesy of Microclean-



### What is Rotation?

- ☐ Alternation of antimicrobial actives
  - √ Two disinfectants in sequence, regular rotation, with sterilant as needed
  - ✓ One disinfectant daily, with sterilant weekly or monthly

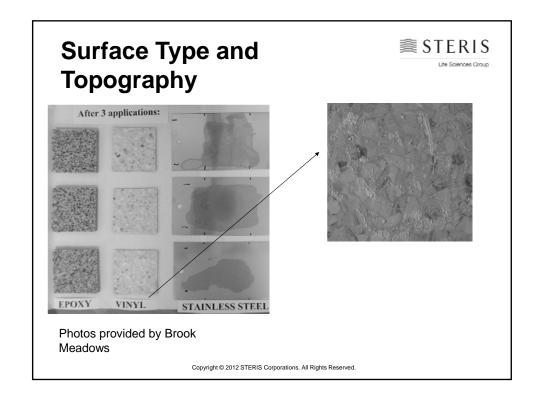
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### **Rotation Guidance**



- ✓ USP 35 <1072>
- ✓ Annex I (2007- Orange Guide)
- √ Aseptic Processing Guide (2004)
- ✓ Conner & Eckman Studies
- ✓ FDA, MHRA, IMB, French and Japanese, & EMA Expectations
- ✓ Industry Articles (Ex. Scott Sutton, Jose Martinez, Richard Prince)
- ✓ USP 35 <797>









- ☐ Rinsing
- ☐ Guidance USP 35 <1072>
  - √ 70% IPA or Water for Injection
  - ✓ Cleaners (Acidic, Neutral, Basic)
  - ✓ As needed to control residue
    - ✓ Aesthetic
    - √ Safety Risk (Sticky, Tacky, Slippery)
    - ✓ Particulate Issues
    - √ Functional
    - ✓ Microbial Issue (Hiding Microbes & Food Sources)
    - ✓ Product risk (Flaking of residues into filled products)

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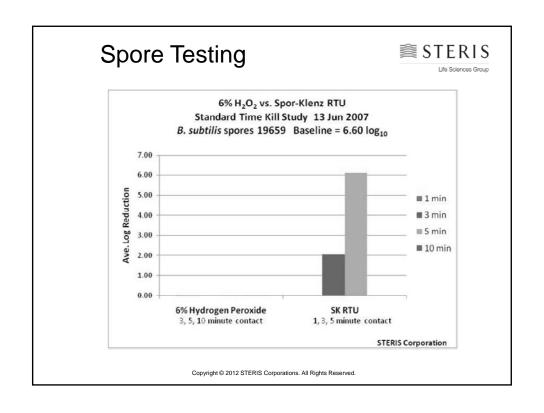


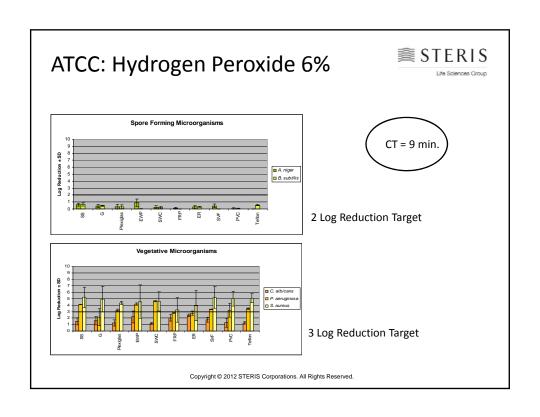
# Case Study on Substrates

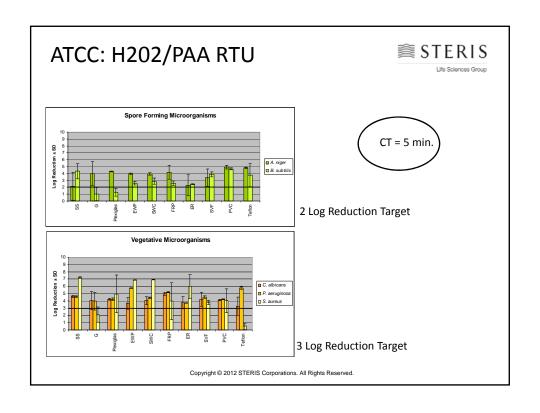
Table 3. Efficacy (log reduction) of Low pH phenolic: (1:256 Dilution) against test microorganisms on representative surface	S
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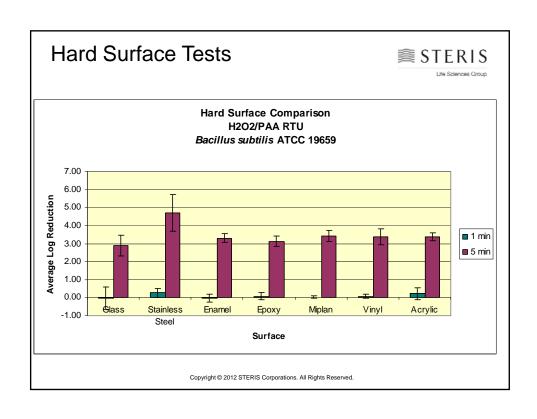
Surface	Staphylococcus epidermidis	Pseudomonas aeruginosa	Corynebacteriu m glutamicum	Candida albicans	Aspergillus niger	Penicillium chrysogenum
Stainless Steel	6.62	>6.10 b	4.18	>4.31 b	<3.00c	4.95
Glass	6.85	6.42	5.26	>5.80 b	2.98	5.11
Aluminum	6.35	5.69	5.14	>3.93 b	<3.00c	3.48
Ероху	4.36	4.45	4.48	3.19	<3.00°	<3.00°
Enamel	>6.05 <sup>b</sup>	>5.72 b	5.45	>3.92 b	<3.00°	2.83
Acrylic	4.53	6.06	4.49	2.92	<3.00°	<3.0 °
Miplan	4.36	3.87	4.29	4.37	<3.00°	3.25
Vinyl	4.08	3.68	3.93	2.61	<3.00°	2.1
Hardwood	5.18	>4.54 b	5.26	3.2	<3.00c	2.59
Melamine Covered Wood	>5.38 <sup>b</sup>	>5.64 <sup>b</sup>	>5.09 <sup>b</sup>	>5.12 <sup>b</sup>	3.65	3.95
Plastic	>5.73 b	>5.32 b	>5.05 b	>4.04 b	<3.00°	2.44
Plexiglas	>5.90 <sup>b</sup>	5.62	4.83	>4.40 b	<3.00°	3.85
Print	5.85	5.86	5.74	4.51	<3.00°	3.38
Chromium	6.55	5.95	6.63	4.08	<3.00°	2.61

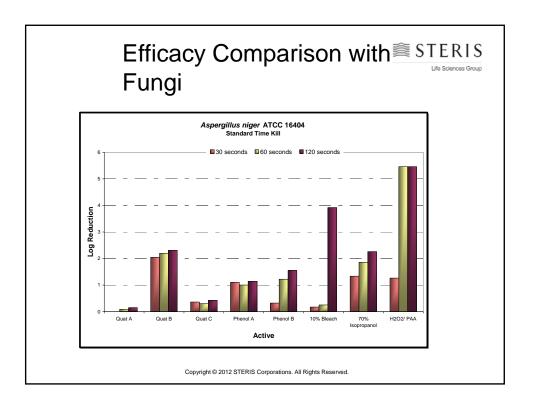
a Disinfectant Efficacy = (Log MSP<sub>(positive control)</sub> - Log MSP<sub>(test coupons)</sub>), where MSP<sub>(Positive Control)</sub> = Mean surviving population on test coupons after disinfectant treatment; b Each of triplicate coupons showed no growth after disinfectant treatment; cEach of triplicate coupons showed TNTC growth











# Agenda



- Current Industry Trends
  - > Cleaning and Disinfection
  - ➤ Current Warning Letters & Industry Guidance

# **Current Guidance on Disinfectants**



- ■USP 35 General Chapter <1072>
- ■ISO /DIS 14698-parts1-3
- ■The Orange Guide 2007
- Aseptic Processing Guide 2004
- Current Industry Articles (Jose Martinez, Scott Sutton, Richard Prince)
- ■USP 35 <797>
- Several Industry Books (Seymour S. Block)

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### 483 Observation



• "The records do not include specific documentation on the time employed in the cleaning and disinfection of the separate areas in order to make a better assessment about the procedures executed and if they are consistently followed."March 1, 2012



## 483 Observation

 "The firm enlisted the services of a contract firm to conduct cleaning and disinfection and inspection reports lacked adequate scientific justification and/or rationale documentation to support conclusions or actions to handle OOS results." March 15, 2012

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# **Current Warning Letter**



 "Your firm has not established procedures designed to prevent microbiological contamination of drug products purporting to be sterile" Warning Letter February 22, 2012



## **Current Warning Letter**

"Your Disinfectant qualification for (b) (4) and (b) (4) bi-spore disinfectants documented that the log reduction criteria (Bacteria>4, Fungi>3) was not met when challenged with multiple organisms in variety of surfaces. After disinfection you recovered *Micrococcus luteus* on vinyl, (b) (4), stainless steel, glass and wall laminate and *Enterobacter cloacae*, *Rhodococcus* sp, *Burkholderia cepacia*, *Pseudomonas aeruginosa* on glass. However your procedures for routine cleaning of the aseptic manufacturing area continue to require the use of unqualified disinfectants during days (b) (4) through (b) (4) of your disinfection program" Warning Letter October 7, 2011.

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### **Current Warning Letters**



"The materials that were tested in the Disinfectant Efficacy study were not representative of all the surfaces present in the Aseptic Processing Area." "The stainless steel coupon tested did not represent these damaged surfaces" Warning Letter May 25, 2011



# **Current Warning Letter**

 "Furthermore, we evaluated your environmental data from 2008 to 2010 and are concerned with the lack of comprehensive investigations when mold and bacteria were identified in your aseptic filling facility that exceeded action levels."
 Warning Letter February 10, 2011

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# **Current Warning Letter**



 "We note that the cGMP violations listed in this letter include similar violates to those cited in the previous February 2008 inspection including failure to adequately conduct disinfectant efficacy studies" Warning Letter July 14, 2011.



# **Current Warning Letter**

 "The inspection documented mold contamination in the Class 100 production room and visible black mold on the wall" "Your firm did not establish a schedule for cleaning with an agent designed to kill spores, although mold continued to be found in the class 10,000 area." Warning Letter October 29, 2010

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# Warning Letter



 "Systematic facility cleaning for mold was not initiated in a timely manner. Systematic cleaning was initiated after several months of environmental excursions for mold throughout the manufacturing areas, including aseptic areas." Warning Letter March 28, 2008.

<b>1 A</b> A	•	•	Letter		
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- •"Your firm does not ensure that a \_\_\_\_\_ system is employed, or that the disinfectant is rendered sterile prior to use."
- •However your response to our FDA-483 is inadequate because the following were not addressed: Effectiveness of \_\_\_\_\_ solution at the dilution used, and 2) effectiveness of \_\_\_\_\_
- •throughout the shelf life (up to the expiry date)."
- •Warning Letter March 2009.

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# **Questions & Answers**