

Reducing Manufacturing Risk with Rapid Microbiological Methods (RMMs)

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General overview of RMMs Compare to agar plates RMM example--IMD-A system TR33 Examples of RMM reducing risk



Why adopt an RMM?

Faster, Better and/or Cheaper (and accepted by regulators)



Sample FMEA – Agar Plates



RMM Detection Taxonomy





The Microbial Environment

Microorganisms Defined By Physiology & Culturability



Maximum growth rate Fully metabolizing

> "Sterile and Non-Sterile Product Risks From Viable But Non-Culturable Bacteria"

Edward C. Tidswell PhD Senior Director Baxter Healthcare Corporation

October 2009. PDA 5th Annual Global Conference on Pharmaceutical Microbiology, Washington, DC



Typical Human Upper Respiratory Flora

BACTERIUM	Nose	Pharynx	Mouth
Staphylococcus epidermidis	++	++	++
Staphylococcus aureus*	+	+	+
Streptococcus mitis		+	++
Streptococcussalivarius		++	++
Streptococcus mutans*		+	++
Streptococcus pneumoniae*	+/-	+	+
Streptococcus pyogenes		+	+
Neisseria sp.	+	++	+
Neisseria meningitidis	+	++	+
Proteus sp.	+	+	+
Haemophilus influenzae*	+	+	+
Lactobacillus sp.		+	++
Corynebacteria	++	+	+
Actinomycetes		+	+
Spirochetes		+	++
Mycoplasmas		+	+

Green: Will grow on TSA/TSB

Red: Will <u>NOT</u> grow* on TSA/TSB

Orange: <u>May</u> Grow on TSA/TSB *Under typical incubation conditions.

"Regulatory Expectations for Aseptically Produced Parenterals"

Ian Symonds, Director Aseptic Quality Assurance, GlaxoSmithKline

December 2009 PDA Meeting, Milan



Microbial Culturability and Detectability

Most bacteria need other bacteria to grow¹

- Need growth factors called siderophores that bind iron
- 1% of bacteria make growth factors for the other 99%

1. Kim Lewis (2010) Siderophores from neighboring organisms promote the growth of uncultured bacteria. Chemistry & Biology. 17(3):256-264



Microbial Culturability and Detectability

Open Question:

 Have agar plates worked so well because they grow up the microbes that are most dangerous (make growth factors)?

False negatives and non-biological positives





Comparing RMMs

False Negatives (Plates)

- Can be viable microbes that don't grow under conditions used
- Can be from inhibitors in testing material
- Cannot use scientific methods to discriminate between real and false negatives
- Less likely to raise questions with regulators

"False" Positives (RMMs)

- Can be instrument noise
- Can be non-biological positives
- Use scientific methods to discriminate between real and non-biological or false positives
- Might raise questions with regulators



Episodic Sampling

- Air samplers do not measure most of the time
- Some RMMs can do continuous sampling to detect fluctuations in microbes over time



Sample FMEA – Agar Plates





FMEA Example – Growth-Independent RMM

FMEA – Risk Assessment and Characterization





Example RMM Technology

How the IMD-A works

- Laser shines on microbes
- Detects intrinsic fluorescence
- Primary markers: NADH, Riboflavin, and DPA





Small Inert Particle





Large Inert Particle





Large Biologic Particle





Real-Time Data Acquisition



Data is acquired and displayed every 1 second (bottom screen). Yellow bars are nonviable particles and red bars are viable particles.

The top screen shows continuous monitoring data. This is refreshed every 1 second. Note the spike in counts at the far right.

The rolling sample is the particle count for the last sample size collected. The average sample is the average particle count per sample size over the entire monitoring run.



User Interface

🔢 PharmaMaster			
Historical Config Front Panel About Point Floor Point Mgr Continuous Mgr			
Profiles			
Miller Test 1			
Profile Settings			
Sample Size: 1.00 cubic feet			
Event Threshold: 10 % of Sample			
Particles >=0.5 Biologics Particles >=5.0			
Action Level: 30,000 300 300			
Alert Level: 20,000 200 200			
Biologics			
Particles >= 0.5 □ 0.5 - 1 □ 5 - 7			
✓ Particles >= 5.0			
✓ All Biologics			
Events: A Lee 10 2000, 2:25:20-			
Air Sampled: 4.53 cubic feet % Bio: 3.0%			
Marker:			



Video is synced with monitoring data and can be used to support a root cause analysis of a contamination event





Technical Report No. 33 (Revised 2013) Evaluation, Validation and Implementation of Alternative and Rapid Microbiological Methods



TR33

- Much longer (56 pages) than previous TR33, EP 5.1.6 or USP <1223>
- What needs to be done (not how to do it)
- Written for liquid suspensions, different approaches may be needed for air systems
- Not likely to be harmonized with EP 5.1.6 and USP <1223>



Real life examples



HEPA filter ajar

RMM showed the air was clean, only the frame was askew

RMM showed high counts in class B room

• Indicated that air from HEPA filter was not aseptic



- Air samplers detected high CFU in some rooms of a class D aseptic suite
 - Did not indicate the source
- Long samples with RMM did not go down to zero at rest in rooms with high CFU
- RMM detected high counts in air coming in through light switches and electric plugs
- These rooms had negative pressure, should have been positive



- Air samplers detected mold in room
 - Do not show where the mold was
- RMM "sniffer" detected crack in plaster with high counts
- Behind the plaster was a large mold colony



Overnight sample showed peak around midnight

Review of video showed presence of cleaning crew

Multi-day sample showed high counts in aseptic suite corresponding to construction activity next door

- Door between areas was not allowing construction dust in (working as it should)
- Sniffer function detected previously unknown conduits between the aseptic suite and construction area



Fill line restarted after cleaning and upgrades

- Fill line itself was well controlled, very low counts
- Operator loading vials generated many particles



Opportunities with an RMM

Faster, Better and/or Cheaper... And less risk



Opportunities with an RMM (assuming you want to improve)



Yes, it's old technology, but it's validated.

PharmaEvolution.com cartoon contest, June/July 2013



Improvement Opportunities (assuming you want to improve)

The most dangerous phrase in the language is "we've always done it this way."



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