

Aseptic Operations and Cleanroom Principals

PDA SoCal Chapter, Aseptic Processing and Sterilization Symposium

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Presenter: Paul Andrea

Date: 07Nov2019



Presentation Topics

- ▶ PDA WCC Chapter Information
- ▶ Aseptic Operations and Cleanroom Principals
 - ▶ Contamination Control Basics
 - ▶ Environmental Monitoring
 - ▶ Personnel Training
 - ▶ Gowning
 - ▶ Personnel Behaviors
 - ▶ Working in Isolator and RABS
 - ▶ QA Responsibilities
 - ▶ Guidance Documents

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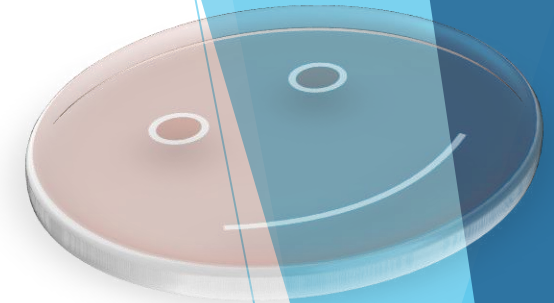
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My Journey– Paul Andrea



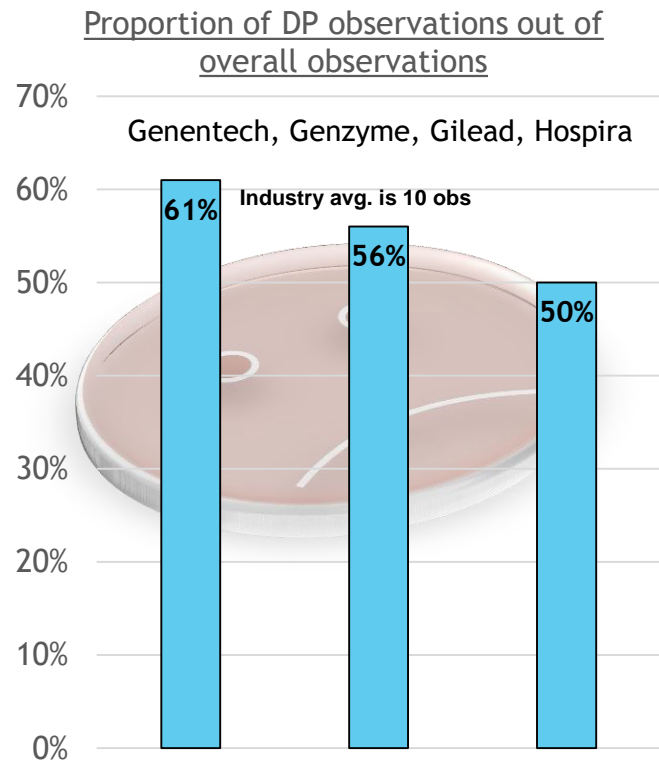
- ***Hometown: San Mateo, California***
- ***25+ years in GMP Manufacturing***
- ***18+ years with Roche/Genentech***
 - ***Cell Culture, Facility Management, Fill/Finish***
- ***5+ years at Samsung Biologics***
 - ***Drug Product Team Leader***
- ***Principal Consultant at TAF Group LLC, BioPharma Services and Training***
- ***Family: Wife and 2 teenage daughters, and Dexter***
- ***Settled Back in the Bay***

Aseptic Operations and Cleanroom Principals

The Reality

FDA findings for poor aseptic practices are at a growing rate due to an increase in scrutiny in the manufacture of sterile product to ensure “the Safety, Identity, Strength, Purity, and Quality (SISPQ) are consistently maintained”

Form 483s



The Aseptic Culture

- **For minimization of Regulatory Observations you must...**

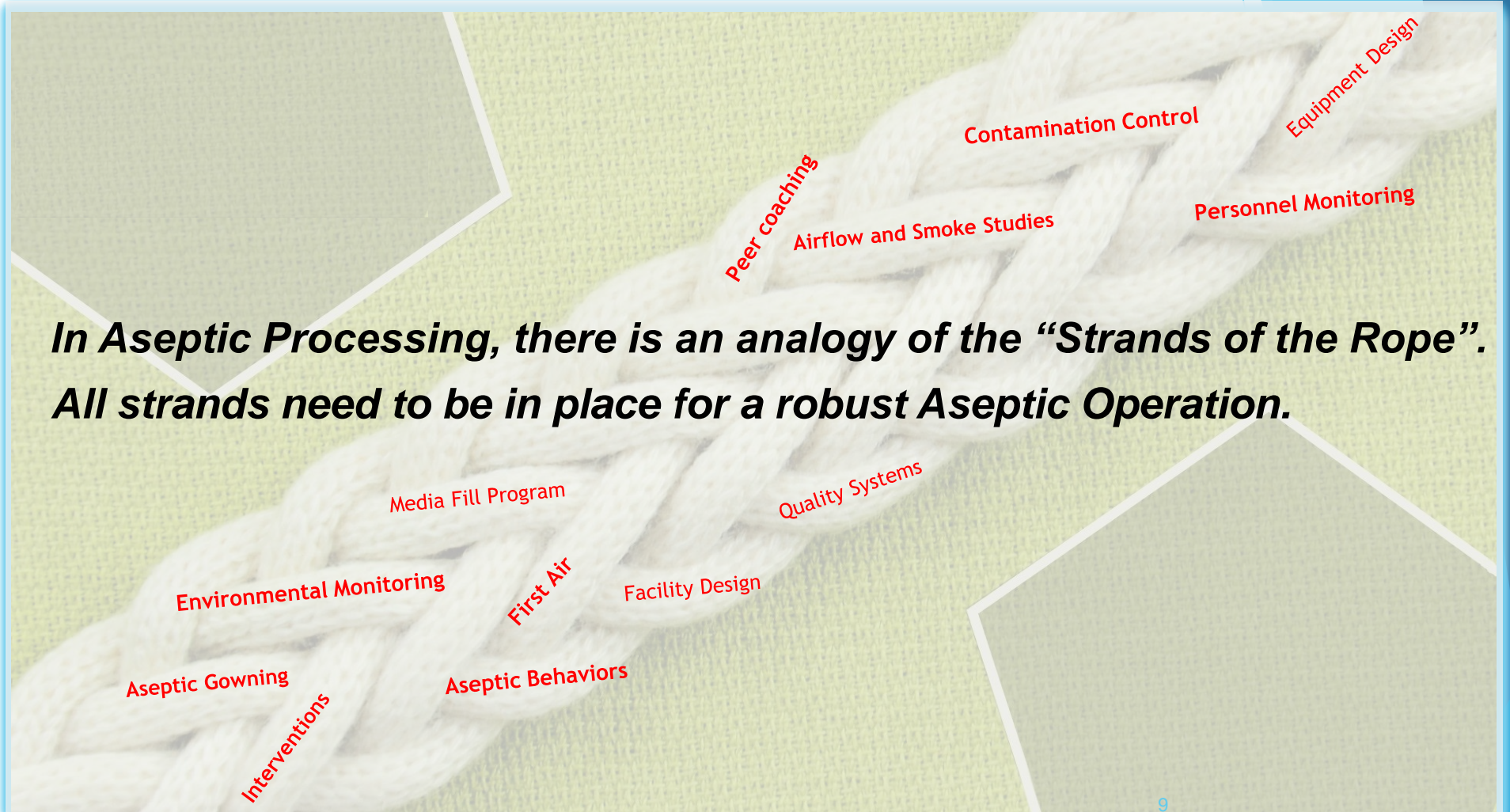
LIVE Aseptic

BREATH Aseptic

EDUCATE Aseptic

REWARD Aseptic

Strands of the Rope



In Aseptic Processing, there is an analogy of the “Strands of the Rope”. All strands need to be in place for a robust Aseptic Operation.

Contamination Control

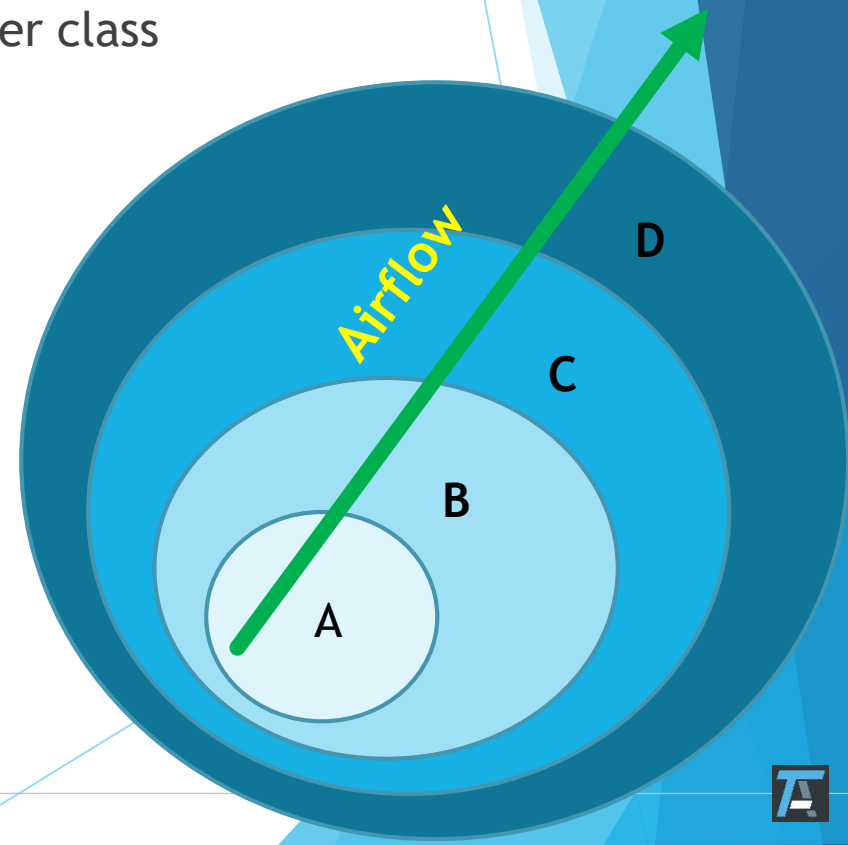
Microbiological Risks

- ▶ Facility Design Principles
- ▶ Personnel and Cleanroom Behavior
- ▶ Aseptic Operations and Technique
- ▶ *Additional Considerations*
 - ▶ Aseptic Philosophies
 - ▶ Aseptic Processing Definitions
 - ▶ Sterility Assurance Level
 - ▶ General Facility Control
 - ▶ Cleaning and Sanitization

Facility Design and Protection of Critical Areas

▶ Facility Design

- ▶ Cleanroom facilities are designed to go from lower class to higher class (less clean to more clean)
- ▶ Each subsequent clean space requires additional controls to prevent ingress of undesired items
- ▶ Goal is to make it more difficult for contamination to occur as you get cleaner
- ▶ Minimize critical area space - contamination risk, cost, maintenance



Facility Design and Protection of Critical Areas

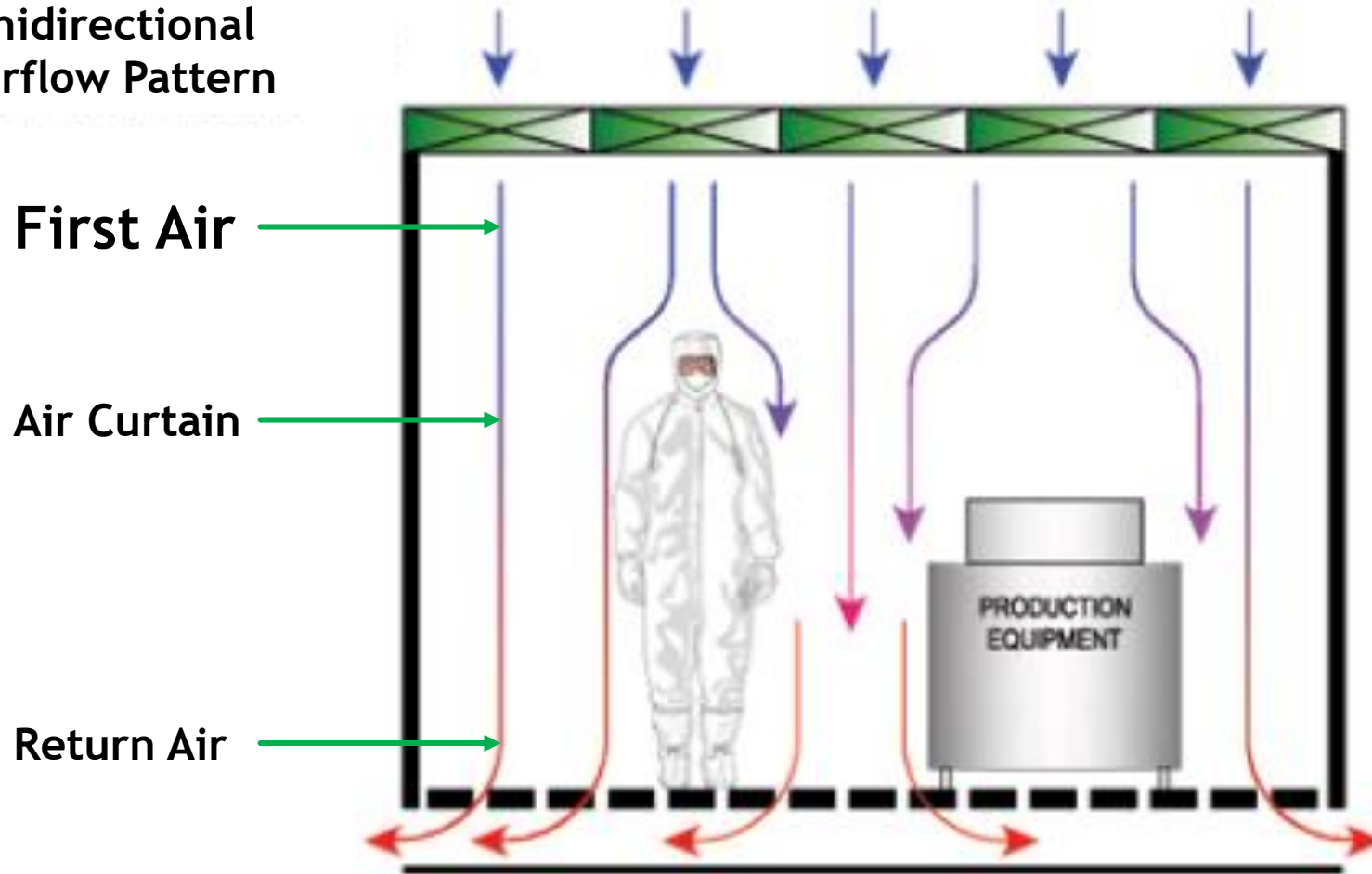
- ▶ Layout
 - ▶ Organization of Workflow
 - ▶ Minimize Critical Area
- ▶ Design
 - ▶ Cleanability
 - ▶ Smooth, continuous surfaces
- ▶ Pressurization
 - ▶ Force Airflow Away From Critical Areas
 - ▶ Smoke Tests

Facility Design and Protection of Critical Areas

- ▶ Maintenance
 - ▶ HVAC Systems
 - ▶ Certification of HEPA Filters
 - ▶ Flow Velocity
 - ▶ Aerosol Challenge for Integrity
 - ▶ dP Monitoring
- ▶ Sanitization
 - ▶ Cleaning/Disinfection Agents
 - ▶ Environmental Monitoring

Facility Design and Protection of Critical Areas

Unidirectional Airflow Pattern



EM Monitoring

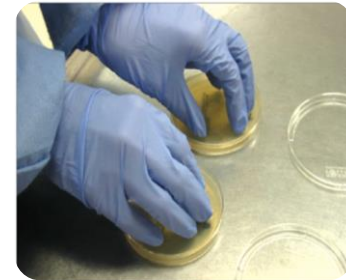
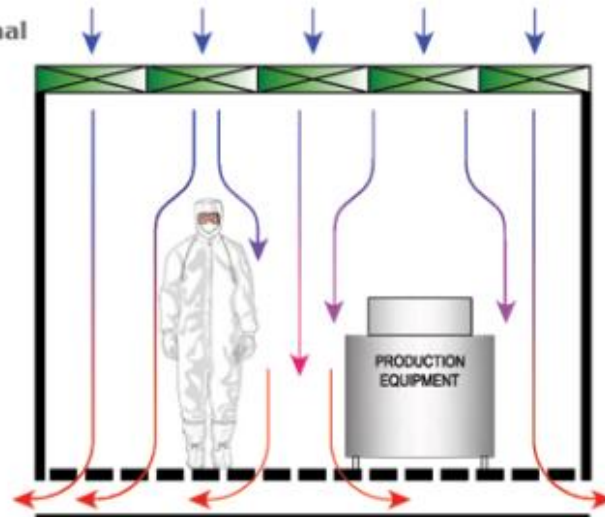


Fig 2. Unidirectional Flow Cleanroom



Components of an EM Program

- ▶ Facility Design (Personnel/Material Flow, HVAC, Proper Room Cascades)
- ▶ Comprehensive Quality Risk Assessment (QRA/RA) for all Critical Areas - Evaluating Location, Methodology, Frequency and Equipment
- ▶ Building Management System (or another form of real time monitoring)
- ▶ Detailed Procedures that are easily understood
- ▶ Trained Personnel
 - ▶ Performing Sampling
 - ▶ Documentation
 - ▶ Reading plates

Components of an EM Program

- ▶ Clear Roles and Responsibilities (R&R)
- ▶ Robust Cleaning and Sanitization Program
- ▶ Personnel who understand the nature of EM and their overall impact to the Environment
- ▶ Trending Program
- ▶ Utility Program

Personnel Training

FDA Guidance for Aseptic Processing

21 CFR 211.25(a) states that “Each person engaged in the manufacture, processing, packing, or holding of a drug product shall have education, training, and experience, or any combination thereof, to enable that person to perform the assigned functions...

...Training in current good manufacturing practice shall be conducted by qualified individuals on a continuing basis and with sufficient frequency to assure that employees remain familiar with CGMP requirements applicable to them

Training and Qualification Requirements

- ▶ For Aseptic Operators, must have a detailed, clear, and comprehensive training plan which includes
 - ▶ Aseptic behavior and Cleanroom training
 - ▶ Basic Microbiological Training
 - ▶ Gowning Qualification Program
 - ▶ Equipment Use Qualification
 - ▶ EM Qualification (if applicable)
 - ▶ Smoke Study Participation and/or Viewing
 - ▶ Process Simulation Execution

Training and Qualification Requirements

- ▶ For all personnel entering into Aseptic Core, one needs to understand their impact on the environment
 - ▶ Maintenance personnel
 - ▶ Cleaning Crew
 - ▶ QC
 - ▶ QA
 - ▶ Contractors and/or Equipment Vendors

Training and Qualification Requirements

- ▶ Qualification Maintenance
 - ▶ Gowning - 1x/year unless no entry for “x” months or if there is an EM failure
 - ▶ For EM failure, need to consider frequency, severity of failure, point of failure before determining appropriate action
 - ▶ Media Fills - Participate in at least 1 media fill/year
 - ▶ Interventions - Perform intervention at least 1x/year to maintain qualification. If proceduralized, can justify performing a subset of interventions rather than all
 - ▶ Continuing education on Aseptic concepts

Aseptic Gowning

Aseptic Gowning and Certification

- ▶ Importance of Gowning
- ▶ Aseptic Gowning Rules
- ▶ Guidelines
- ▶ *Additional Considerations*
 - ▶ *Aseptic Garments*
 - ▶ *Aseptic Gowning Certification Program*
 - ▶ *Demonstration of Aseptic Gowning*

Importance of Gowning

- ▶ GMP Requirement
 - ▶ FDA's CFR 211.28, Personnel Responsibilities
 - ▶ Described in applicable Regulatory Guidelines
- ▶ Provides a critical barrier between people and the product or the APA environment
 - ▶ Reduces microbiological ingress
 - ▶ Protects environment and product
- ▶ Part of entire Contamination Control Program

Aseptic Gowning

▶ Guidelines

- ▶ Personal Hygiene is of utmost importance
- ▶ Ensure all hair, including facial hair, is covered - NO SKIN
- ▶ Sanitize hands following each step
- ▶ Hand sanitization must include all parts of the fingers, palm, wrist, and forearm
- ▶ Do not talk while gowning

Aseptic Gowning

▶ No Cosmetics

- ▶ Cosmetics consist of individual particles
- ▶ Viscous or greasy based material
- ▶ Captures and traps microorganisms against the skin
- ▶ Adds to the organic matter and oil on the skin
- ▶ Presents an avoidable source of contamination
- ▶ Includes makeup, hair spray, artificial nails, nail polish, etc.

Aseptic Gowning

▶ No Jewelry

- ▶ Harbors microorganisms
- ▶ Harbors particles and body oils
- ▶ Creates abrasions
- ▶ Generates flaking of skin cells
- ▶ Rings can damage gloves and create holes
- ▶ Presents an avoidable source of contamination

Personnel and Cleanroom Behaviors

Who is this???



YOU !!!

Personnel Behavior

Body Emission Related to Activity



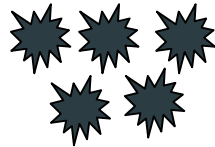
Standing



100,000



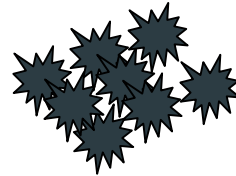
Modest movement



500,000



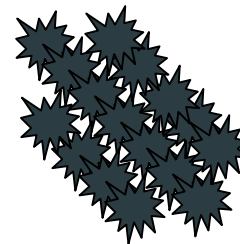
Full body movement



2,000,000



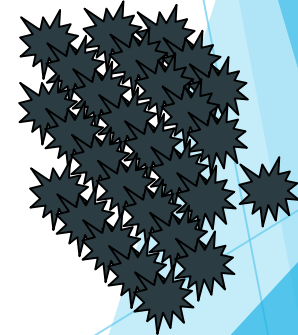
Slow walking



5,000,000



Rigorous Exercise



30,000,000

Particle Emission
($>0.3\mu$)

Clean Room Behavior - MUST be detailed in SOPs

- ▶ Minimal Communication
- ▶ Keep movements slow
- ▶ Maintenance of aseptic gown
- ▶ Don't lean against the wall
- ▶ Don't pick items up off the floor
- ▶ Don't huddle
- ▶ Maintain Control when you encounter a problem
- ▶ Frequent glove sanitization
- ▶ Keep sterile articles continuously bathed in direct, unobstructed, uninterrupted, HEPA-filtered air or “first air”
- ▶ **FEEDBACK FEEDBACK FEEDBACK**

Working with RABS/Isolator

Aseptic Operations

- ▶ Aseptic Practices
- ▶ Cleaning and Sanitization
- ▶ Interventions
- ▶ QA Oversight
- ▶ EM Procedures

Working in RABS or Isolators

- Aseptic Practices

- ▶ Generally speaking, you want to enter Grade A as MINIMAL as possible during operations
- ▶ When required to enter RABS through gloves
 - ▶ Clear the line whenever possible
 - ▶ Sanitize gloves before placing into RABS glove
 - ▶ NEVER reach over product contact parts - remember “**first air**” concept
 - ▶ Always use sterile tools (forceps, hemostats, mechanical, etc)
- ▶ Use the “clean person”/”dirty person” concept
- ▶ Follow your intervention procedures exactly, if you need to do something differently, consult with your QA team

Working in RABS or Isolators

- Cleaning and Sanitization

- ▶ Cleaning should be performed pre/post operations. Cleaning procedures should be detailed as to where to start and end, using uni-directional motion, use of detergents and wipes, etc.
- ▶ After performing an intervention, properly sanitize impacted area with sterile, pre-saturated, IPA wipes. If a “sterile” item is compromised, replace it
- ▶ Ensure entire doors are wiped when performing open door intervention

Working in RABS or Isolators

- Interventions

- ▶ Intervention needs to be documented based on classification and in REAL TIME
- ▶ Detailed procedures should direct you on how to clean
 - ▶ product spill, open door, glass breakage, vial jam, etc
- ▶ Procedures need to address type of monitoring performed after intervention (additional, personnel, etc)
- ▶ DO NOT reach over product contact space so to interrupt First Air
- ▶ For any unqualified intervention, SOP must provide guidance on path forward

Intervention Management

- ▶ All interventions must be captured in a QRA
- ▶ Best practice is to categorize between Routine/Non-routine
 - ▶ Routine - stopper/cap addition, fallen vial, EM, etc
 - ▶ Non-routine - broken vial, open door, major mechanical adjustment, change part removal, power outage, etc
- ▶ Each intervention should have detailed instructions as to how they are performed and what actions are taken before, during, and after intervention
- ▶ New interventions should be qualified as soon as possible as to when they were performed (and added to QRA)

Intervention Management

- ▶ Regs state that interventions **MUST** be qualified through media fills
- ▶ General standard is that routine interventions are performed every media fill and non-routine are performed at least 1x/year
- ▶ Current trend is that interventions are performed at maximum frequency as worse case production batch
- ▶ QA oversight is highly recommended during non-routine interventions
- ▶ **DO NOT** ever justify a bad practice through an intervention, even though you passed MF
 - ▶ Using non-sterile items
 - ▶ Having to pass items over product contact surfaces/open containers
 - ▶ Others?

QA Oversight

- ▶ All companies need to have a QA Oversight program
- ▶ Especially important for Fill and Finish Operations as this is the expectation of Regulatory Agencies
- ▶ Procedures should detail R&R, expectations, frequency, identification of anomalies, escalations, documentation
- ▶ At the very least, QA should view all production operations and documenting aseptic behaviors (good and bad)

Useful References...

1. Guidance for Industry Sterile Drug Products Produced by Aseptic Processing – Current Good Manufacturing Practice
2. EudraLex The Rules Governing Medicinal Products in the European Union - Annex 1 Manufacture of Sterile Medicinal Products
3. ISO 14644-1: Cleanrooms and Associated Controlled Environments, Classification of Air Cleanliness.
4. Technical Report No. 36, “Current Practices in the Validation of Aseptic Processing,” Parenteral Drug Association, Inc., 2002.
5. Parenteral Drug Association: www.pda.org
6. Google
7. Youtube!

???'s

