

CLEANING VALIDATION

PRACTICAL COMPLIANCE SOLUTIONS FOR PHARMACEUTICAL MANUFACTURING

VOLUME 3



Destin A. LeBlanc

www.pda.org/bookstore

CLEANING VALIDATION

PRACTICAL COMPLIANCE SOLUTIONS FOR PHARMACEUTICAL MANUFACTURING

Volume Three

Destin A. LeBlanc

PDA
Bethesda, MD, USA
DHI Publishing, LLC
River Grove, IL, USA

www.pda.org/bookstore

10 9 8 7 6 5 4 3 2 1

ISBN: 1-933722-68-1

Copyright © 2013 Destin A. LeBlanc

All rights reserved.

All rights reserved. This book is protected by copyright. No part of it may be reproduced, stored in a retrieval system or transmitted in any means, electronic, mechanical, photocopying, recording, or otherwise, without written permission from the publisher. Printed in the United States of America.

Where a product trademark, registration mark, or other protected mark is made in the text, ownership of the mark remains with the lawful owner of the mark. No claim, intentional or otherwise, is made by reference to any such marks in the book. The author has made every effort to provide accurate citations. If there are any omissions, please contact the publisher.

While every effort has been made by the publisher and the authors to ensure the accuracy of the information expressed in this book, the organization accepts no responsibility for errors or omissions. The views expressed in this book are those of the editors and authors and may not represent those of either Davis Healthcare International or the PDA, its officers, or directors.



Connecting People, Science and Regulation®



This book is printed on sustainable resource paper approved by the Forest Stewardship Council. The printer, Gasch Printing, is a member of the Green Press Initiative and all paper used is from SFI (Sustainable Forest Initiative) certified mills.

Parenteral Drug Association® (PDA)

Bethesda Towers, Suite 150
4350 East-West Highway
Bethesda, MD 20814
United States
www.pda.org/bookstore
001-301-986-0293

Davis Healthcare International Publishing, LLC

2636 West Street
River Grove
IL 60171
United States
www.DHIBooks.com

www.pda.org/bookstore

CONTENTS

Foreword	vii
General Topics	I
1. <i>The Changing Paradigm for Cleaning Validations</i>	3
2. <i>Differences between Cleaning and Process Validation</i>	7
3. <i>“Design Space” for Cleaning Processes</i>	11
4. <i>Understanding the Cleaning Process in 2010 (and Beyond)</i>	15
5. <i>“Continued” vs. “Continuous” Process Verification</i>	19
6. <i>Revisiting “Cleaning Verification”</i>	23
7. <i>How to Completely Avoid Doing Cleaning Validation</i>	27
Special Situations	
8. <i>Significance of Water Activity for Cleaning Validation</i>	33
9. <i>Issues in Cleaning Validation for Parts Washers</i>	39
10. <i>Manual Cleaning Issues — Part 1</i>	43
11. <i>Manual Cleaning Issues — Part 2</i>	47
12. <i>More on Campaign Length</i>	51
13. <i>Use of Alkali/Acid Cleaning Agents in Biotech</i>	55
Residue Limits	
14. <i>Revisiting Limits Based on Process Capability</i>	61
15. <i>Differing Ways to Express Limits</i>	65

16. My Revised Shorthand for Expressing Limits	69
17. Limits Below the LOD in Rinse Solutions — Part 1	73
18. Limits Below the LOD in Rinse Solutions — Part 2	77
19. Limits Below the LOD in Rinse Solutions — Part 3	81
20. Limits for Rinse “Grab” Samples	85
21. Another Alternative for Rinse Sampling Limits	89
22. Basics of “Stratified Sampling”	93
23. More on “Stratified Sampling”	97
24. Final Notes on “Stratified Sampling”	101
25. A Conundrum Regarding Limits	105
26. The Science Behind Limits	109

Risk-MaPP

27. A Critique of Cleaning Validation Issues in ISPE’s RiskMaPP	115
28. More on ISPE’s RiskMaPP	121
29. Where Risk-MaPP Got it Wrong	125
30. The Good, the Bad and the Inexplicable of Risk-MaPP	131
31. How are ADEs Determined for Non-Highly Hazardous Actives?	137
32. Another Critique of Risk-MaPP	143

Visually Clean

33. Visually Clean and Visual Limits	149
34. More Uses for Visual Limit Determination	153
35. Statistics for Visual Limits	157

Sampling

36. What’s an “Equivalent” Swab?	163
37. Use of Multiple Swabs for Sampling	167
38. The Rationale for Rinse Sampling for Cleaning Agents	171

Sampling Recovery

39. Revisiting Linearity of Swab Recovery Results	177
40. Swab Sampling Recovery as a Function of Residue Level	180
41. Acceptable Variability for Sampling Recovery Studies	187
42. An Alternative Swab Recovery Procedure	191
43. More on an Alternative Swab Recovery Procedure	195
44. Grouping for Surfaces for Swab Recovery Studies?	197

Protocol Issues

45. What's Happening to Worst-case Process Conditions?	205
46. What does the FDA Process Validation Guidance say about the Number of Qualification Runs	209
47. Selecting the Number of Validation Runs for Equipment Grouping	215
48. Hold Time Issues	219

Regulatory Issues

49. Regulatory Guidances I'd Like to See Changed — Part 1	227
50. Regulatory Guidances I'd Like to See Changed — Part 2	231

Appendix A:

Acronyms Used in this Volume	235
-------------------------------------	------------

Index	237
--------------	------------

FOREWORD

This is Volume 3, complementing my earlier two books on the same subject. What are presented in this book are modifications and updates of my monthly *Cleaning Memos* originally published on my web site, www.cleaningvalidation.com, in the period from January 2009 through December 2012. Each Cleaning Memo is presented as a chapter, with the chapters then organized by common topics. For example, topics related to setting limits are in one section, those related to sampling in another section, and so forth. The changes made are sometimes relatively simple, and sometimes more detailed. In all cases, I have tried to focus on changes for improving clarity and applicability, as well as to modify the text with new information. I have also added an appendix with a list of acronyms used in this volume. While Volume 2 in this series had an appendix summarizing my shorthand method of expressing limits as I used in 2009, my revised shorthand method is presented in Chapter 16. Therefore I have not elaborated on it in a separate appendix.

I would also like to encourage pharmaceutical manufacturers, and particularly upper management, to meet the challenges of the science-based and risk-based approaches to cleaning validation. Using some of the principles and practices in this volume may help in designing a more effective and efficient cleaning validation program.

I should add a caveat here, much like the caveat before each of the FDA's guidance documents — nothing in this book should be considered mandatory or binding. I have tried to present alternatives where possible. However, achieving the same objectives by utilizing scientifically justified procedures that are applicable to a manufacturer's specific situation is certainly encouraged.

Semper Eadem!
Destin A. LeBlanc
Kodak, TN
February 2013

GENERAL TOPICS

The following seven chapters cover general topics related to cleaning validation in most pharmaceutical manufacturing facilities.