Torres Irizarry, Maridalia

From: Torres Irizarry, Maridalia
Sent: Wednesday, March 25, 2009 6:54 AM
To: Meeks, Virginia L; Alonso, Neisa M
Subject: FW: Follow-up to Field Alert for Motrin Caplets
Attachments: FDA FAR-Motrin-Initial 11-08 F-Up 3 (Scanned).pdf

Virginia, this is the situation described to us during the PRPQA meeting we attended earlier this year.

Maridalia

From: Guzman, Cecilia [MCCPR] [mailto:CGuzma2@its.jnj.com] **On Behalf Of** Carrillo, Eddie [MCCPR]
Sent: Monday, March 23, 2009 11:43 AM
To: Torres Irizarry, Maridalia
Cc: Carrillo, Eddie [MCCPR]
Subject: Follow-up to Field Alert for Motrin Caplets

Maridalia:

Good day! Attached please find the third follow-up to the Field Alert Report (FAR) for Motrin Caplets, which was submitted on November 26, 2008. The original signed document will be delivered to your office. As soon as the "in store" assessment is completed, I will call you or will send you an updated FAR with the next steps. Please note that a Health Hazard assessment was performed and it concluded that the Motrin IB caplets from these lots are not likely to cause an increased risk of serious adverse health consequences.

<<FDA FAR-Motrin-Initial 11-08 F-Up 3 (Scanned).pdf>>

Eddie Carrillo

-3-

McNeil Healthcare, LLC

McNeil Healthcare, LLC • P.O. Box 2009, Las Piedras, Puerto Rico 00771-2009

March 23, 2009

Ms. Maridalia Torres
U. S. Food and Drug Administration
466 Fernández Juncos Ave.
San Juan, Puerto Rico 00901-3223

Ms. Torres:

Attached please the third follow-up to the Field Alert Report (FAR) for Motrin Caplets submitted on November 26, 2008.

Cordially,

for E. Carrillo

Eddie Carrillo
Quality Site Leader

Attachment

-4-

Form Approved: OMB No. 0910-0001, Expiration Date: May 31, 2008
See OMB Statement on Reverse.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

NDA-FIELD ALERT REPORT

TO: *(NAME AND ADDRESS OF DISTRICT)*
Ms. Maridalia Torres, District Director
FDA - San Juan District Office
466 Fernández Juncos Ave.
San Juan, PR 00901-3223

TYPE OF REPORT ☐ Initial ☒ Follow-Up ☐ Final

In accordance with Section 314.81 (b)(1)(i) and (ii) of the New Drug Application Regulations (21 CFR 314) promulgated under the Federal Food, Drug and Cosmetic Act, as amended, the following information is herewith submitted:

1. NDA/ANDA - ANTIBIOTIC FORM 5/6 NO.
19-012 Motrin Caplets

2. NDC No.
50580-110-68

3. GENERIC NAME OF DRUG PRODUCT
Ibuprofen

4. TRADE NAME *(if any)* OF DRUG PRODUCT
Motrin Caplets

5. FIRM NAME AND ADDRESS WHERE PROBLEM OCCURRED
McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

6. FEI
2650141

7. DOSAGE FORM, STRENGTH AND PACKAGE SIZE(S)
Motrin Tablets - Ibuprofen 200mg - 8 count vials

8. LOT NUMBER(S)
SHC003

9. EXPIRATION DATE(S) OF DRUG PRODUCTS
03/2011

10. DATE WHEN NOTIFIED ABOUT PROBLEM(S) OR *WHEN* PROBLEM(S) FIRST BECAME KNOWN TO APPLICATION HOLDER
November 21, 2008

11. HOW WAS PROBLEM DISCOVERED
During the routine stability testing (3-month interval)

12. STATE PROBLEM(S)
Dissolution failure during the 3-month interval stability testing
Actual results:
- S1 = Average: 72% (min. 64%)
- S2 = Average: 71% (min. 64%)
- S3 = Average: 71% (min. 58%)

Specification
S1 = Each unit NLT Q + 5, Q = 80%
S2 = Average of S1 + S2 is equal to or greater than Q. No unit less than Q-15%
S3 = Average of S1+S2+S3 is equal to or greater than Q. Not more than 2 units less than Q-15%. No unit less than Q-25%

13. PROBABLE CAUSE(S) OF PROBLEM(S)
Investigation is in progress.

14. CORRECTIVE ACTION(S) TAKEN *(if any)* TO PREVENT RECURRENCE OF PROBLEM(S)
Remaining inventory in the distribution centers has been placed on hold.

FORM FDA 3331 (4/06) (FRONT) PREVIOUS EDITION IS OBSOLETE

15. REMARKS

* This batch (SHC003), along with two others, was placed on stability in order to fullfill the marketed product stability requirements for new packaging codes (8 and 10 count vials). The other two batches are showing satisfactory dissolution results at S1 stage.
* On October 23, 2008 a communication was issued in order to discontinue the sale of this product display due to low volume sales.
* The retain samples of the finished product batch SH003 were tested and the results were within specifications (average 98, range 82-106, n=12)
* Bulk retained sample of batch SCH003 was tested and result confirmed initial out of specification result.
Average = 76%, Range 65 - 99 (n=24)
* Fresh stability samples of lot SHC003 were tested in our Fort Washington affiliate and results passed dissolution specifications at S2.
Average = 80%, Range 71-94% (n=12)
* Fresh stability samples of lot SHC003 were tested in Las Piedras facility and the S1 results confirmed initial out of specification
Average = 74%, Range 69-79% (n=6)
* Temperature and humidity assessment to the stability chamber and retention room were performed and no atypical value was observed.
* Retain bulk samples of four associated granulation batches were tested. Only compression lot (SDA0000807) failed dissolution S3 criteria. Result obtained for this batch was:
Average = 60%, Range 49-71% (n=24)
This additional bulk batch, which failed dissolution, was pakaged also in vial and was already on hold in the distribution center. Investigation is ongoing to understand the cause of these out of specification results. The other three batches were within specification.
* Assay, IB related compound Isobutylacetophenone, and Impurities results of stability batch SCH003 for the three month interval are well within specification.
* During a detailed assessment of the manufacturing records from granulation step for the compression batch of packaging lot SCH003 a downtime of 1 hour and 25 minutes during drying was observed. This downtime is allowed by procedure, however it was found to be an atypical situation. Various other lots from 2006 through 2008 having similar and longer downtime during the granulation drying process were assessed. One lot on Stability was made using granulation having a similar downtime as SCH003. The stability results thru eighteen (18) months of storage are well within specification. In addition, retain samples from three batches made with granulation having longer drying downtime than that of SCH003 was assessed, one from each assessed years was identified. Retain bulk of these three batches were tested for dissolution and S1 results were well within specifications.
Lot MDA0002299 : Average = 100%, Range 97-102% (n=6)
Lot PHA0002970 : Average = 101%, Range 99 -102% (n=6)
Lot SHA0000372 : Average = 100%, Range 99 - 101% (n=6)
* A medical assessment was requested and it concludes that the use of Motrin IB caplets from these lots is not likely to cause an increased risk of serious adverse health consequences.
* Up to this point, although more investigative work is being performed, it is considered that this event is isolated to the original vial batch number SCH003 and batch SCH004 which a result not meeting S3 dissolution specification was observed during retained bulk testing. Batch SCH004 was also packaged in vials. All remaining inventory of these two batches and other batches in this product code are currently on hold in our distribution centers. As stated before, this product code was discontinued.

A Health Hazard assessment was performed and it concludes that the Motrin IB caplets from these lots are not likely to cause an increased risk of serious adverse health consequences.

Two experimental batches have been manufactured re-creating the downtime specified above and have been packaged in bottles and vials. These will be placed in accelerated stability condition in order to assess the process downtime hypothesis.

As stated above, this Motrin product line was discontinued on October 23, 2008, due to low sales. Remaining inventory in the Distribution Centers and Packaging Contractor of Motrin batches SCH003 and SCH004 were placed on hold in November 2008. It is expected that none of these affected lots are available at the store level. A review of our complaint history indicates that neither affected lot has had a complaint registered against it from November 1st, 2008 through March 19, 2009. This finding further supports the hypothesis that neither of these lots are available at the store level.

In order to confirm that neither affected lots is available at the store level, a third party has been contracted to perform an in store assessment. A statistical sampling of twenty-five (25) percent of all stores across the US that received these batches will be visited. If this assessment confirms that there is no product from batches SCH003 and SCH004 at the store level, a recall will be considered not necessary due to unavailability in the market; otherwise a recall of these Motrin batches will be recommended to be performed. The assessment is expected to be completed by April 15, 2009.

NOTE: SEPARATE NARRATIVE REPORTS MAY BE ATTACHED IF DESIRED.

FORM FDA 3331 (4/06)

REPORTING ESTABLISHMENT	
NAME AND MAILING ADDRESS *(Include ZIP Code)* McNeil Healthcare, LLC PO Box 2009 Las Piedras, PR 00771-2009	
NAME AND TITLE OF AUTHORIZED REPRESENTATIVE Eddie Carrillo	TELEPHONE *(Include Area Code)* 787-733-7651
SIGNATURE OF AUTHORIZED REPRESENTATIVE For Eddie Carrillo	DATE SUBMITTED 3/23/2009

FORM FDA 3331 (4/06)

Torres Irizarry, Maridalia

From: Torres Irizarry, Maridalia
Sent: Thursday, April 23, 2009 3:53 PM
To: Meeks, Virginia L; Alonso, Neisa M
Subject: FW: Field Alert Report for Motrin Caplets - Final Report
Attachments: FDA FAR-Motrin-Final 11-08 (Scanned).pdf

Maridalia

From: Guzman, Cecilia [MCCPR] [mailto:CGuzma2@its.jnj.com] **On Behalf Of** Pujals, Mayra [MCCPR]
Sent: Tuesday, April 21, 2009 4:08 PM
To: Torres Irizarry, Maridalia
Subject: Field Alert Report for Motrin Caplets - Final Report

Maridalia:

Good day! Attached please find the Final Report for the Field Alert Report for Motrin Caplets submitted on November 26, 2008. The original signed document will be delivered to your office.

<<FDA FAR-Motrin-Final 11-08 (Scanned).pdf>>

Mayra Pujals

Quality Site Leader

McNeil Healthcare, LLC

McNeil Healthcare, LLC • P.O. Box 2009, Las Piedras, Puerto Rico 00771-2009

April 21, 2009

Ms. Maridalia Torres
Director, San Juan District Office
U. S. Food and Drug Administration
466 Fernández Juncos Ave.
San Juan, Puerto Rico 00901-3223

Ms. Torres:

Attached please the Final Report to the Field Alert Report (FAR) for Motrin Caplets submitted on November 26, 2008.

Cordially,

Mayra Pujals
Quality Site Leader

Attachment

Form Approved: OMB No. 0910-0001, Expiration Date: May 31, 2008
See OMB Statement on Reverse.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

NDA-FIELD ALERT REPORT

TO: *(NAME AND ADDRESS OF DISTRICT)*
bMs. Maridalia Torres, District Director
FDA - San Juan District Office
466 Fernández Juncos Ave.
San Juan, PR 00901-3223

TYPE OF REPORT: ☐ Initial ☐ Follow-Up ☒ Final

In accordance with Section 314.81 (b)(1)(i) and (ii) of the New Drug Application Regulations (21 CFR 314) promulgated under the Federal Food, Drug and Cosmetic Act, as amended, the following information is herewith submitted:

1. NDA/ANDA - ANTIBIOTIC FORM 5/6 NO
19-012 Motrin Caplets

2. NDC No.
50580-110-68

3. GENERIC NAME OF DRUG PRODUCT
Ibuprofen

4. TRADE NAME *(if any)* OF DRUG PRODUCT
Motrin Caplets

5. FIRM NAME AND ADDRESS WHERE PROBLEM OCCURRED
McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

6. FEI
2650141

7. DOSAGE FORM, STRENGTH AND PACKAGE SIZE(S)
Motrin Tablets - Ibuprofen 200mg - 8 count vials

8. LOT NUMBER(S)
SHC003 and SHC004

9. EXPIRATION DATE(S) OF DRUG PRODUCTS
03/2011

10. DATE WHEN NOTIFIED ABOUT PROBLEM(S) OR WHEN PROBLEM(S) FIRST BECAME KNOWN TO APPLICATION HOLDER
November 21, 2008

11. HOW WAS PROBLEM DISCOVERED
During the routine stability testing (3-month interval)

12. STATE PROBLEM(S)
Dissolution failure during the 3-month interval stability testing (Lot SHC003)
Actual results:
- S1 = Average: 72% (min. 64%)
- S2 = Average: 71% (min. 64%)
- S3 = Average: 71% (min. 58%)

Specification
S1 = Each unit NLT Q + 5, Q = 80%
S2 = Average of S1 + S2 is equal to or greater than Q. No unit less than Q-15%
S3 = Average of S1+S2+S3 is equal to or greater than Q. Not more than 2 units less than Q-15%. No unit less than Q-25%

13. PROBABLE CAUSE(S) OF PROBLEM(S)
Investigation is in progress.

14. CORRECTIVE ACTION(S) TAKEN *(if any)* TO PREVENT RECURRENCE OF PROBLEM(S)
Remaining inventory in the distribution centers has been placed on hold.

FORM FDA 3331 (4/06)

15. REMARKS

As stated in the previous Field Alert Report follow-up issued on March 23, 2009, in order to confirm the availability of Motrin batches SHC003 and SHC004 at the retail level, a statistical sampling of approximately ten (10) percent of all stores across the US that received these batches were visited (250 stores out of 2000). The assessment performed demonstrated that, on a statistical basis, a low amount of product (approximately 1% of the batches) is potentially still at the retail level. The product from the subject lots found in the stores was removed during the visits. Visits to the remaining retailers will be completed by July 15, 2009 to remove any product from the subject lots that is found.

A Health Hazard assessment has indicated that the use of Motrin IB caplets of the above batches is not likely to cause an increased risk of serious adverse health consequences. In addition, a review of our complaint history indicates that neither affected lots have had complaints registered against them from November 1, 2008 through April 13, 2009.

NOTE: SEPARATE NARRATIVE REPORTS MAY BE ATTACHED IF DESIRED.

REPORTING ESTABLISHMENT

NAME AND MAILING ADDRESS *(Include ZIP Code)*

McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	TELEPHONE *(Include Area Code)*
Mayra Pujals Quality Site Leader	787-733-7656
SIGNATURE OF AUTHORIZED REPRESENTATIVE	DATE SUBMITTED
	4/21/2009

8

Hangemanole, Fayleen M.

From: Ganjawala, Milind
Sent: Monday, January 25, 2010 7:09 AM
To: Metayer, Ann; Gould, Catherine; Hirshfield, Karen
Subject: FW: Message from 7066137529

Attachments: F09-825F.pdf; Microsoft Office Word Document; Motrin Initial 11-08 F-Up.pdf; Motrin Initial 11-08 F-Up.pdf

Attached are copies of the Motrin FAR.

F09-825F.pdf (83 KB)

In order to confirm that neither affected lots is avalilable at the store level, a third party has been contracted t assessment. A statistical sampling of twenty-five (25) percent of all stores across the US that received these l If this assessment confirms that there is no product from batches SCH003 and SCH004 at the store level, a re not necessary due to unavailability in the market; otherwise a recall of these Motrin batches will be recomme The assessment is expected to be completed by April 15, 2009.

The FAR dated 2/23/09 had the following note worthy statement:

Motrin Initial 11-08 F-Up.pdf ...

Thanks,

Milind Ganjawala
Recalls and Shortages Branch
Division of Manufacturing Product Quality
Office of Compliance
Center for Drug Evaluation and Research, FDA
WO Bldg 51 Room 1316
Phone: 301-796-3318
Fax: 301-847-8742

From: Torres Irizarry, Maridalia
Sent: Friday, January 22, 2010 4:30 PM
To: Quiros, Simonne M; Ganjawala, Milind
Cc: Murphy, Elise
Subject: FW: Message from 7066137529

-9-

Fyi.

Maridalia Torres
District Director
Food and Drug Administration
#466 Fernandez Juncos
San Juan, P.R. 00901-3223
Off. 787-474-9565
Mob. 787-365-5191
Fax 787-729-6851

From: Alonso, Neisa M
Sent: Friday, January 22, 2010 12:52 PM
To: Torres Irizarry, Maridalia
Subject: RE: Message from 7066137529

These are the documents that I sent with the RES 53140/Recall # D-050-2010 of the recall of Motrin 8 ctn - to CDER Recall & OE Recall.

Here is the first FAR.

Motrin Initial 11-08
F-Up.pdf ...

From: Quiros, Simonne M
Sent: Thursday, January 21, 2010 3:57 PM
To: Ganjawala, Milind
Cc: Torres Irizarry, Maridalia; Murphy, Elise
Subject: RE: Message from 7066137529

<< File: Motrin Consignee Report to FDA 7-28-09.xls >> << File: F09-825F.pdf >> << File: FDA Att. B Form for Motrin, 8-5-09.pdf >> << File: LCC2008-0244.7843867.pdf >> << File: LCC2008-0244..8736779..pdf >>

Milind,

In regards to your request attached are all the reports we have concerning Motrin recall. We do not have the final report only the final I am going Maridalia who may have it.

Thanks,
Simonne

From: Unity Messaging System - FDAVOIP14
Sent: Thursday, January 21, 2010 12:48 PM
To: Quiros, Simonne M
Subject: Message from 7066137529

<< File: VoiceMessage >>

Tracking:	Recipient	Read
	Metayer, Ann	Read: 1/25/2010 9:23 AM
	Gould, Catherine	
	Hirshfield, Karen	Read: 1/25/2010 7:41 AM

McNeil
Healthcare, LLC
McNeil Healthcare, LLC • P.O. Box 2009, Las Piedras, Puerto Rico 00771-2009

April 21, 2009

Ms. Maridalia Torres
Director, San Juan District Office
U. S. Food and Drug Administration
466 Fernández Juncos Ave.
San Juan, Puerto Rico 00901-3223

Ms. Torres:

Attached please the Final Report to the Field Alert Report (FAR) for Motrin Caplets submitted on November 26, 2008.

Cordially,

Mayra Pujals
Quality Site Leader

Attachment

Form Approved: OMB No. 0910-0001. Expiration Date: May 31, 2008
See OMB Statement on Reverse.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

NDA-FIELD ALERT REPORT

TO: *(NAME AND ADDRESS OF DISTRICT)*
bMs. Maridalia Torres, District Director
FDA - San Juan District Office
466 Fernández Juncos Ave.
San Juan, PR 00901-3223

TYPE OF REPORT

☐ Initial ☐ Follow-Up ☒ Final

In accordance with Section 314.81 (b)(1)(i) and (ii) of the New Drug Application Regulations (21 CFR 314) promulgated under the Federal Food, Drug and Cosmetic Act, as amended, the following information is herewith submitted:

1. NDA/ANDA - ANTIBIOTIC FORM 5/6 NO.
19-012 Motrin Caplets

2. NDC No.
50580-110-68

3. GENERIC NAME OF DRUG PRODUCT
Ibuprofen

4. TRADE NAME *(if any)* OF DRUG PRODUCT
Motrin Caplets

5. FIRM NAME AND ADDRESS WHERE PROBLEM OCCURRED
McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

6. FEI
2650141

7. DOSAGE FORM, STRENGTH AND PACKAGE SIZE(S)
Motrin Tablets - Ibuprofen 200mg - 8 count vials

8. LOT NUMBER(S)
SHC003 and SHC004

9. EXPIRATION DATE(S) OF DRUG PRODUCTS
03/2011

10. DATE WHEN NOTIFIED ABOUT PROBLEM(S) OR WHEN PROBLEM(S) FIRST BECAME KNOWN TO APPLICATION HOLDER
November 21, 2008

11. HOW WAS PROBLEM DISCOVERED
During the routine statibility testing (3-month interval)

12. STATE PROBLEM(S)
Dissolution failure during the 3-month interval stability testing (Lot SHC003)
Actual results:
- S1 = Average: 72% (min. 64%)
- S2 = Average: 71% (min. 64%)
- S3 = Average: 71% (min. 58%)

Specification
S1 = Each unit NLT Q + 5, Q = 80%
S2 = Average of S1 + S2 is equal to or greater than Q. No unit less than Q-15%
S3 = Average of S1+S2+S3 is equal to or greater than Q. Not more than 2 units less than Q-15%. No unit less than Q-25%

13. PROBABLE CAUSE(S) OF PROBLEM(S)
Investigation is in progress.

14. CORRECTIVE ACTION(S) TAKEN *(if any)* TO PREVENT RECURRENCE OF PROBLEM(S)
Remaining inventory in the distribution centers has been placed on hold.

15. REMARKS

As stated in the previous Field Alert Report follow-up issued on March 23, 2009, in order to confirm the availability of Motrin batches SHC003 and SHC004 at the retail level, a statistical sampling of approximately ten (10) percent of all stores across the US that received these batches were visited (250 stores out of 2000). The assessment performed demonstrated that, on a statistical basis, a low amount of product (approximately 1% of the batches) is potentially still at the retail level. The product from the subject lots found in the stores was removed during the visits. Visits to the remaining retailers will be completed by July 15, 2009 to remove any product from the subject lots that is found.

A Health Hazard assessment has indicated that the use of Motrin IB caplets of the above batches is not likely to cause an increased risk of serious adverse health consequences. In addition, a review of our complaint history indicates that neither affected lots have had complaints registered against them from November 1, 2008 through April 13, 2009.

NOTE: SEPARATE NARRATIVE REPORTS MAY BE ATTACHED IF DESIRED.

REPORTING ESTABLISHMENT

NAME AND MAILING ADDRESS *(Include ZIP Code)*

McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	TELEPHONE *(Include Area Code)*
Mayra Pujals Quality Site Leader	787-733-7656
SIGNATURE OF AUTHORIZED REPRESENTATIVE	DATE SUBMITTED
	4/21/2009

McNeil Healthcare, LLC

McNeil Healthcare, LLC • P.O. Box 2009, Las Piedras, Puerto Rico 00771-2009

March 23, 2009

Ms. Maridalia Torres
U. S. Food and Drug Administration
466 Fernández Juncos Ave.
San Juan, Puerto Rico 00901-3223

Ms. Torres:

Attached please the third follow-up to the Field Alert Report (FAR) for Motrin Caplets submitted on November 26, 2008.

Cordially,

for E. Carrillo

Eddie Carrillo
Quality Site Leader

Attachment

Form Approved: OMB No. 0910-0001. Expiration Date: May 31, 2008
See OMB Statement on Reverse.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

NDA-FIELD ALERT REPORT

TO: *(NAME AND ADDRESS OF DISTRICT)*
Ms. Maridalia Torres, District Director
FDA - San Juan District Office
466 Fernández Juncos Ave.
San Juan, PR 00901-3223

TYPE OF REPORT

☐ Initial ☒ Follow-Up ☐ Final

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50580-110-68

3. GENERIC NAME OF DRUG PRODUCT
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4. TRADE NAME *(if any)* OF DRUG PRODUCT
Motrin Caplets

5. FIRM NAME AND ADDRESS WHERE PROBLEM OCCURRED
McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

6. FEI
2650141

7. DOSAGE FORM, STRENGTH AND PACKAGE SIZE(S)
Motrin Tablets - Ibuprofen 200mg - 8 count vials

8. LOT NUMBER(S)
SHC003

9. EXPIRATION DATE(S) OF DRUG PRODUCTS
03/2011

10. DATE WHEN NOTIFIED ABOUT PROBLEM(S) OR WHEN PROBLEM(S) FIRST BECAME KNOWN TO APPLICATION HOLDER
November 21, 2008

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Investigation is in progress.

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Remaining inventory in the distribution centers has been placed on hold.

15. REMARKS

* This batch (SHC003), along with two others, was placed on stability in order to fullfill the marketed product stability requirements for new packaging codes (8 and 10 count vials). The other two batches are showing satisfactory dissolution results at S1 stage.
* On October 23, 2008 a communication was issued in order to discontinue the sale of this product display due to low volume sales.
* The retain samples of the finished product batch SH003 were tested and the results were within specifications (average 98, range 82-106, n=12)
* Bulk retained sample of batch SCH003 was tested and result confirmed initial out of specification result.
Average = 76%, Range 65 - 99 (n=24)
* Fresh stability samples of lot SHC003 were tested in our Fort Washington affiliate and results passed dissolution specifications at S2.
Average = 80%, Range 71-94% (n=12)
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Average = 74%, Range 69-79% (n=6)
* Temperature and humidity assessment to the stability chamber and retention room were performed and no atypical value was observed.
* Retain bulk samples of four associated granulation batches were tested. Only compression lot (SDA0000807) failed dissolution S3 criteria. Result obtained for this batch was:
Average = 60%, Range 49-71% (n=24)
This additional bulk batch, which failed dissolution, was pakaged also in vial and was already on hold in the distribution center. Investigation is ongoing to understand the cause of these out of specification results. The other three batches were within specification.
* Assay, IB related compound Isobutylacetophenone, and Impurities results of stability batch SCH003 for the three month interval are well within specification.
* During a detailed assessment of the manufacturing records from granulation step for the compression batch of packaging lot SCH003 a downtime of 1 hour and 25 minutes during drying was observed. This downtime is allowed by procedure, however it was found to be an atypical situation. Various other lots from 2006 through 2008 having similar and longer downtime during the granulation drying process were assessed. One lot on Stability was made using granulation having a similar downtime as SCH003. The stability results thru eighteen (18) months of storage are well within specification. In addition, retain samples from three batches made with granulation having longer drying downtime than that of SCH003 was assessed, one from each assessed years was identified. Retain bulk of these three batches were tested for dissolution and S1 results were well within specifications.
Lot MDA0002299 : Average = 100%, Range 97-102% (n=6)
Lot PHA0002970 : Average = 101%, Range 99 -102% (n=6)
Lot SHA0000372 : Average = 100%, Range 99 - 101% (n=6)
* A medical assessment was requested and it concludes that the use of Motrin IB caplets from these lots is not likely to cause an increased risk of serious adverse health consequences.
* Up to this point, although more investigative work is being performed, it is considered that this event is isolated to the original vial batch number SCH003 and batch SCH004 which a result not meeting S3 dissolution specification was observed during retained bulk testing. Batch SCH004 was also packaged in vials. All remaining inventory of these two batches and other batches in this product code are currently on hold in our distribution centers. As stated before, this product code was discontinued.

A Health Hazard assessment was performed and it concludes that the Motrin IB caplets from these lots are not likely to cause an increased risk of serious adverse health consequences.

Two experimental batches have been manufactured re-creating the downtime specified above and have been packaged in bottles and vials. These will be placed in accelerated stability condition in order to assess the process downtime hypothesis.

As stated above, this Motrin product line was discontinued on October 23, 2008, due to low sales. Remaining inventory in the Distribution Centers and Packaging Contractor of Motrin batches SCH003 and SCH004 were placed on hold in November 2008. It is expected that none of these affected lots are available at the store level. A review of our complaint history indicates that neither affected lot has had a complaint registered against it from November 1st, 2008 through March 19, 2009. This finding further supports the hypothesis that neither of these lots are available at the store level.

In order to confirm that neither affected lots is avalilable at the store level, a third party has been contracted to perform an in store assessment. A statistical sampling of twenty-five (25) percent of all stores across the US that received these batches will be visited. If this assessment confirms that there is no product from batches SCH003 and SCH004 at the store level, a recall will be considered not necessary due to unavailability in the market; otherwise a recall of these Motrin batches will be recommended to be performed. The assessment is expected to be completed by April 15, 2009.

NOTE: SEPARATE NARRATIVE REPORTS MAY BE ATTACHED IF DESIRED.

REPORTING ESTABLISHMENT	
NAME AND MAILING ADDRESS *(Include ZIP Code)* McNeil Healthcare, LLC PO Box 2009 Las Piedras, PR 00771-2009	
NAME AND TITLE OF AUTHORIZED REPRESENTATIVE Eddie Carrillo	TELEPHONE *(Include Area Code)* 787-733-7651
SIGNATURE OF AUTHORIZED REPRESENTATIVE MPL for Eddie Carrillo	DATE SUBMITTED 3/23/2009

McNeil
Healthcare, LLC
McNeil Healthcare, LLC • P.O. Box 2009, Las Piedras, Puerto Rico 00771-2009

March 23, 2009

Ms. Maridalia Torres
U. S. Food and Drug Administration
466 Fernández Juncos Ave.
San Juan, Puerto Rico 00901-3223

Ms. Torres:

Attached please the third follow-up to the Field Alert Report (FAR) for Motrin Caplets submitted on November 26, 2008.

Cordially,

for E. Carrillo

Eddie Carrillo
Quality Site Leader

Attachment

Form Approved: OMB No. 0910-0001. Expiration Date: May 31, 2008
See OMB Statement on Reverse.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

NDA-FIELD ALERT REPORT

TO: *(NAME AND ADDRESS OF DISTRICT)*
Ms. Maridalia Torres, District Director
FDA - San Juan District Office
466 Fernández Juncos Ave.
San Juan, PR 00901-3223

TYPE OF REPORT

☐ Initial ☒ Follow-Up ☐ Final

In accordance with Section 314.81 (b)(1)(i) and (ii) of the New Drug Application Regulations (21 CFR 314) promulgated under the Federal Food, Drug and Cosmetic Act, as amended, the following information is herewith submitted:

1. NDA/ANDA - ANTIBIOTIC FORM 5/6 NO.
19-012 Motrin Caplets

2. NDC No.
50580-110-68

3. GENERIC NAME OF DRUG PRODUCT
Ibuprofen

4. TRADE NAME *(if any)* OF DRUG PRODUCT
Motrin Caplets

5. FIRM NAME AND ADDRESS WHERE PROBLEM OCCURRED
McNeil Healthcare, LLC
PO Box 2009
Las Piedras, PR 00771-2009

6. FEI
2650141

7. DOSAGE FORM, STRENGTH AND PACKAGE SIZE(S)
Motrin Tablets - Ibuprofen 200mg - 8 count vials

8. LOT NUMBER(S)
SHC003

9. EXPIRATION DATE(S) OF DRUG PRODUCTS
03/2011

10. DATE WHEN NOTIFIED ABOUT PROBLEM(S) OR WHEN PROBLEM(S) FIRST BECAME KNOWN TO APPLICATION HOLDER
November 21, 2008

11. HOW WAS PROBLEM DISCOVERED
During the routine stability testing (3-month interval)

12. STATE PROBLEM(S)
Dissolution failure during the 3-month interval stability testing
Actual results:
- S1 = Average: 72% (min. 64%)
- S2 = Average: 71% (min. 64%)
- S3 = Average: 71% (min. 58%)

Specification
S1 = Each unit NLT Q + 5, Q = 80%
S2 = Average of S1 + S2 is equal to or greater than Q. No unit less than Q-15%
S3 = Average of S1+S2+S3 is equal to or greater than Q. Not more than 2 units less than Q-15%. No unit less than Q-25%

13. PROBABLE CAUSE(S) OF PROBLEM(S)
Investigation is in progress.

14. CORRECTIVE ACTION(S) TAKEN *(if any)* TO PREVENT RECURRENCE OF PROBLEM(S)
Remaining inventory in the distribution centers has been placed on hold.

15. REMARKS

* This batch (SHC003), along with two others, was placed on stability in order to fullfill the marketed product stability requirements for new packaging codes (8 and 10 count vials). The other two batches are showing satisfactory dissolution results at S1 stage.
* On October 23, 2008 a communication was issued in order to discontinue the sale of this product display due to low volume sales.
* The retain samples of the finished product batch SH003 were tested and the results were within specifications (average 98, range 82-106, n=12)
* Bulk retained sample of batch SCH003 was tested and result confirmed initial out of specification result.
Average = 76%, Range 65 - 99 (n=24)
* Fresh stability samples of lot SHC003 were tested in our Fort Washington affiliate and results passed dissolution specifications at S2.
Average = 80%, Range 71-94% (n=12)
* Fresh stability samples of lot SHC003 were tested in Las Piedras facility and the S1 results confirmed initial out of specification
Average = 74%, Range 69-79% (n=6)
* Temperature and humidity assessment to the stability chamber and retention room were performed and no atypical value was observed.
* Retain bulk samples of four associated granulation batches were tested. Only compression lot (SDA0000807) failed dissolution S3 criteria. Result obtained for this batch was:
Average = 60%, Range 49-71% (n=24)
This additional bulk batch, which failed dissolution, was pakaged also in vial and was already on hold in the distribution center. Investigation is ongoing to understand the cause of these out of specification results. The other three batches were within specification.
* Assay, IB related compound Isobutylacetophenone, and Impurities results of stability batch SCH003 for the three month interval are well within specification.
* During a detailed assessment of the manufacturing records from granulation step for the compression batch of packaging lot SCH003 a downtime of 1 hour and 25 minutes during drying was observed. This downtime is allowed by procedure, however it was found to be an atypical situation. Various other lots from 2006 through 2008 having similar and longer downtime during the granulation drying process were assessed. One lot on Stability was made using granulation having a similar downtime as SCH003. The stability results thru eighteen (18) months of storage are well within specification. In addition, retain samples from three batches made with granulation having longer drying downtime than that of SCH003 was assessed, one from each assessed years was identified. Retain bulk of these three batches were tested for dissolution and S1 results were well within specifications.
Lot MDA0002299 : Average = 100%, Range 97-102% (n=6)
Lot PHA0002970 : Average = 101%, Range 99 -102% (n=6)
Lot SHA0000372 : Average = 100%, Range 99 - 101% (n=6)
* A medical assessment was requested and it concludes that the use of Motrin IB caplets from these lots is not likely to cause an increased risk of serious adverse health consequences.
* Up to this point, although more investigative work is being performed, it is considered that this event is isolated to the original vial batch number SCH003 and batch SCH004 which a result not meeting S3 dissolution specification was observed during retained bulk testing. Batch SCH004 was also packaged in vials. All remaining inventory of these two batches and other batches in this product code are currently on hold in our distribution centers. As stated before, this product code was discontinued.

A Health Hazard assessment was performed and it concludes that the Motrin IB caplets from these lots are not likely to cause an increased risk of serious adverse health consequences.

Two experimental batches have been manufactured re-creating the downtime specified above and have been packaged in bottles and vials. These will be placed in accelerated stability condition in order to assess the process downtime hypothesis.

As stated above, this Motrin product line was discontinued on October 23, 2008, due to low sales. Remaining inventory in the Distribution Centers and Packaging Contractor of Motrin batches SCH003 and SCH004 were placed on hold in November 2008. It is expected that none of these affected lots are available at the store level. A review of our complaint history indicates that neither affected lot has had a complaint registered against it from November 1st, 2008 through March 19, 2009. This finding further supports the hypothesis that neither of these lots are available at the store level.

In order to confirm that neither affected lots is avalilable at the store level, a third party has been contracted to perform an in store assessment. A statistical sampling of twenty-five (25) percent of all stores across the US that received these batches will be visited. If this assessment confirms that there is no product from batches SCH003 and SCH004 at the store level, a recall will be considered not necessary due to unavailability in the market; otherwise a recall of these Motrin batches will be recommended to be performed. The assessment is expected to be completed by April 15, 2009.

NOTE: SEPARATE NARRATIVE REPORTS MAY BE ATTACHED IF DESIRED.

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NAME AND TITLE OF AUTHORIZED REPRESENTATIVE Eddie Carrillo	TELEPHONE *(Include Area Code)* 787-733-7651
SIGNATURE OF AUTHORIZED REPRESENTATIVE MPL for Eddie Carrillo	DATE SUBMITTED 3/23/2009

Alonso, Neisa M

From: Ramos, Edwin
Sent: Thursday, February 18, 2010 12:26 PM
To: Alonso, Neisa M
Subject: FW: Please confirm if this is correct MOTRIN RES 53140

So, do you know if the questioned information is accurate??

From: Ganjawala, Milind
Sent: Thursday, February 18, 2010 11:16 AM
To: Alonso, Neisa M; Ramos, Edwin
Cc: Zamora, Armando; Hirshfield, Karen; Gould, Catherine; Torres Irizarry, Maridalia
Subject: RE: Please confirm if this is correct MOTRIN RES 53140

Neisa,

Thanks. In addition can you send me a copy of the firms recall initiation letter. I will give you a call.

Thanks,

Milind Ganjawala
Recalls and Shortages Branch
Division of Manufacturing Product Quality
Office of Compliance
Center for Drug Evaluation and Research, FDA
WO Bldg 51 Room 1316
Phone: 301-796-3318
Fax: 301-847-8742

From: Alonso, Neisa M
Sent: Thursday, February 18, 2010 9:49 AM
To: Ganjawala, Milind; Ramos, Edwin
Cc: Zamora, Armando; Hirshfield, Karen; Gould, Catherine
Subject: RE: Please confirm if this is correct MOTRIN RES 53140

I will check the file and e-mails and let you know...

Neisa

From: Ganjawala, Milind
Sent: Thursday, February 18, 2010 10:48 AM
To: Ramos, Edwin; Alonso, Neisa M
Cc: Zamora, Armando; Hirshfield, Karen; Gould, Catherine
Subject: RE: Please confirm if this is correct MOTRIN RES 53140
Importance: High

Edwin Nolan

Some of the date such as Firm Awareness Date 08/18/2008 and Recall Initiation Date 11/08/2008 in the MOTRIN RES 53140 (see attached) look strange. Can you verify the information in the RES in order to correct the information today.

Thanks.

Milind Ganjawala
Recalls and Shortages Branch
Division of Manufacturing Product Quality
Office of Compliance
Center for Drug Evaluation and Research, FDA
WO Bldg 51 Room 1316
Phone: 301-796-3318
Fax: 301-847-8742

From: Hirshfield, Karen
Sent: Thursday, February 18, 2010 9:12 AM
To: Ganjawala, Milind
Cc: Zamora, Armando
Subject: Re: Please confirm if this is correct

Is this odd or what. If the dates are 2008 then is the informatdo we have accurate? If these are typos then pls contact District to correct. Impt to clear up today
Karen Hirshfield

From: Ganjawala, Milind
To: Hirshfield, Karen
Sent: Thu Feb 18 08:07:29 2010
Subject: RE: Please confirm if this is correct

Recall Event ID 53140 EON ID
District San Juan Coordinator Carlos I Medina
Firm Awareness Date 08/18/2008 District Awareness Date 07/21/2009
Center (Int) Center for Drug Evaluation and Research Coordinator Raymond L Brown
Recalling Firm FEI 1000656533 Name (Int) Mcneil Consumer Products Co.
Manufacturer FEI 2650141 Name (Int) McNeil Consumer and Specialty Pharmaceuticals
Responsible Firm FEI 2650141 Name McNeil Consumer and Specialty Pharmaceuticals
Public Reason for Recall Failed USP Dissolution Requirements; 3-month stability test interval.
Edit Mode Viewable Recall Status (Int) Ongoing
Voluntary/Mandated (Int) Date (Int)
Firm Recommended Recall Depth Retail Date Distribution Chain Notified 11/08/2008
Recall Initiation Date (Int) 11/08/2008

I don't know why the district took months but the recall strategy indicated there was a meeting with the firm, SJN-DO and CDER see below;

:"

Recall Strategy Firm's contracted the services of a company, to Visitec a number of customers and purchase all the Motrin 8 count bottle st found. Customers visited were not notified that McNeil was recalling the product.. This activities were conducted without FDA knowledge. Meeting with the firm, SJN-DO and CDER, was conducted, prior to failure of the stability program. CDER notified the firm that this was considered as a recall. Firm submitted the first FAR, after product failed stability dissolution.

Milind Ganjawala
Recalls and Shortages Branch
Division of Manufacturing Product Quality
Office of Compliance
Center for Drug Evaluation and Research, FDA
WO Bldg 51 Room 1316
Phone: 301-796-3318
Fax: 301-847-8742

From: Hirshfield, Karen
Sent: Thursday, February 18, 2010 7:45 AM
To: Ganjawala, Milind
Subject: RE: Please confirm if this is correct

Did you mean recall initiation date was 11/08/2009? You had 2008. Also for the firm's awareness date you had 2008. is that correct? Any explanation why it took the District a month to tell the firm?

thanks
Karen Hirshfield
☎ (301) 796-1748 (Office)
(301) 847-8742 (FAX)

From: Ganjawala, Milind
Sent: Thursday, February 18, 2010 7:28 AM
To: Hirshfield, Karen
Subject: RE: Please confirm if this is correct

The firm did notify the FDA via FARs. The initial dated 11/26/08, follow up dated 3/23/09, and final dated 4/21/09. According to the document we have the silent recall was ongoing on or around 6/12/09. I addition according to RES the district awareness date was 7/21/2009, firm awareness date was 8/18/08, recall initation date was 11/08/2008 and date distribution chain notified was 11/08/2008. So according to the dated the firm initiated a silent recall and informed the FDA approximately 9 month later and then initiated a official recall.

Thanks,

Milind Ganjawala
Recalls and Shortages Branch
Division of Manufacturing Product Quality
Office of Compliance

Center for Drug Evaluation and Research, FDA
WO Bldg 51 Room 1316
Phone: 301-796-3318
Fax: 301-847-8742

From: Hirshfield, Karen
Sent: Thursday, February 18, 2010 7:12 AM
To: Ganjawala, Milind
Subject: Please confirm if this is correct

- In 2008 your organization identified a dissolution failure for Motrin IB Caplets. Instead of notifying the agency and issuing a recall of the product, your firm hired a 3rd party company to buy back the Motrin from the pharmacies and retail locations. The 3rd party representatives were instructed to "simply 'act' like a regular customer" while making the purchases, and "THERE MUST BE NO MENTION OF THIS BEING A RECALL OF THE PRODUCT!" The recall of the product was only initiated after FDA brought this issue to your attention in July 2009

Karen G. Hirshfield, R.Ph.
CAPT, USPHS
Recall and Shortages Branch
Office of Compliance, CDER, FDA
☎ (301) 796-1748 (Office)
(301) 847-8742 (FAX)
✉ Karen.Hirshfield@fda.hhs.gov