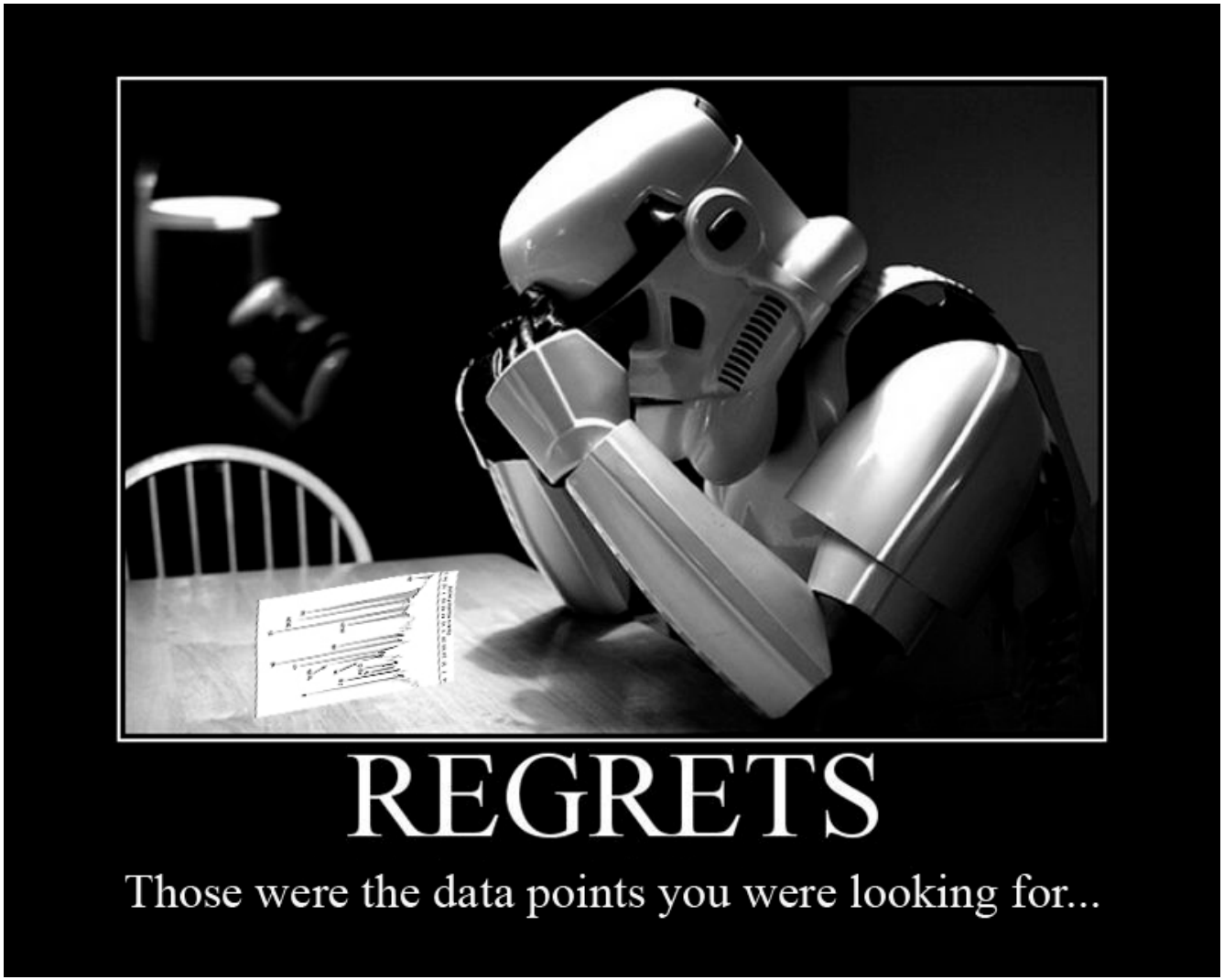
EPA Audit and Non-GLP Standards

Matt Hengel

Western Region IR-4 Laboratory
Research Director

EPA Audit and Non-GLP Standards



EPA Audit Review

- Received notification of inspection on 4/18/2012.
- Inspection was planned for 6/7/2012 by Dan Myers.
- Inspection would be part of pilot program where the data from the targeted studies would be sent to EPA for review prior to a one day onsite visit.

EPA Audit Review

- Initially we were instructed to make hard copies of all the data associated with each study.
- The copied data was verified and a certification statement was signed.
- Copies of the associated SOP’s were included.
- Electronic copies (pdf) of the data and SOP’s were also included.

EPA Audit Review

- On 6/7/2012, Dan Myers arrived and notified us that this would be a neutral scheme inspection.
- Dan was supplied with a floor plan, organizational chart and CVs.
  - Dan chose to review only the CVs of newer employees
- Dan was given a tour of the Meyer Hall and CHE facilities.

EPA Audit Review

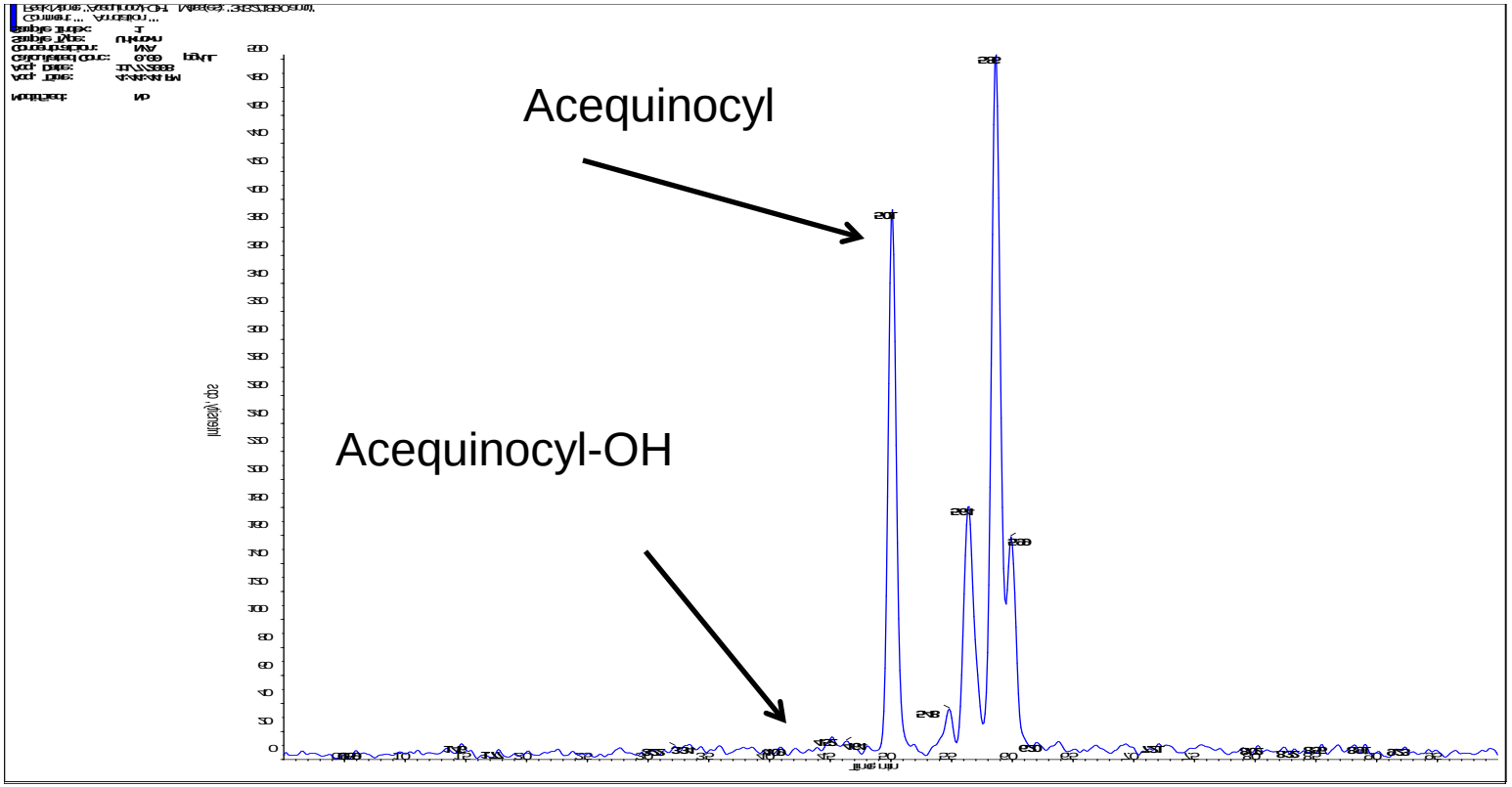
- Specific areas Dan had questions and/or comments

EPA Audit Review

- Acequinocyl/Cherry
  - It appeared that a set of metabolite chromatograms were not reported and no explanation was made.
  - Matt explained that the metabolite was reported, but the chromatograms that Dan was looking at were associated with the diluted sample for parent determination. Therefore no value was reported for the metabolite for these injections.

EPA Audit Review

- Acequinocyl/Cherry

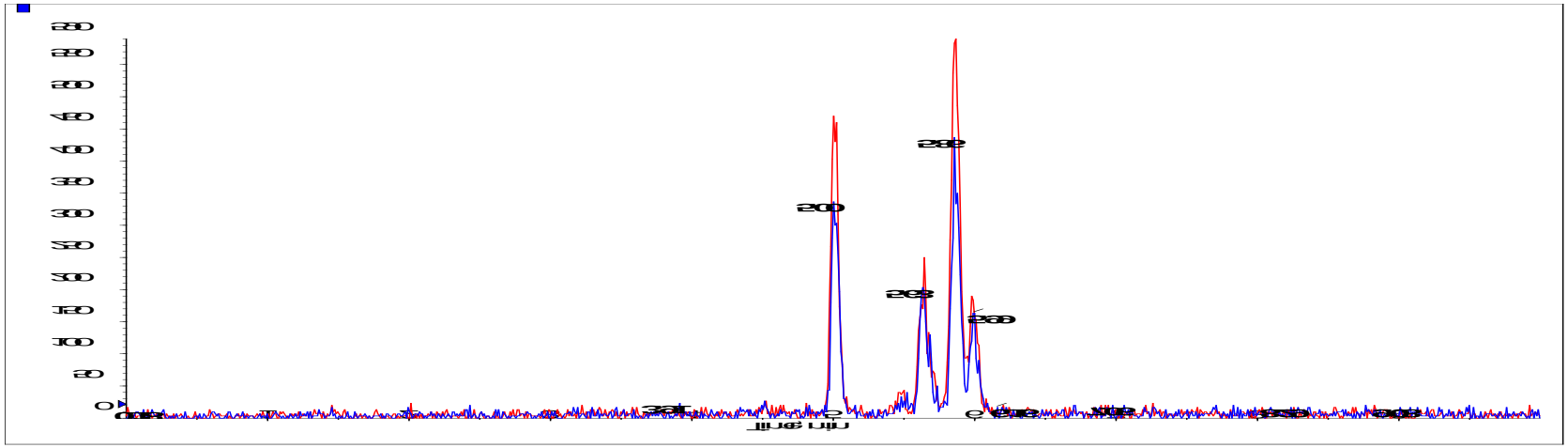


EPA Audit Review

- Acequinocyl/Cherry
  - In looking up the chromatograms, Dan asked about raw data vs processed (integrated) data. His concern was being able to track changes to integration and whether the raw data can be changed.
    - It was explained that if the baseline was changed and the set reprocessed, new date/initials would be added to differentiate the new results from the old.

EPA Audit Review

- Acequinocyl/Cherry
  - Raw data cont.
    - The original file (raw data) remains unchanged and is regularly backed up on the server.
    - Dan's major concern was that the original data could not be altered.



EPA Audit Review

- Unique identifiers on instrumentation
  - GC-MS is named “Instrument 8” but no label was observed on the GC-MS to identify it as such.
    - #8 was added.
  - Balances were identified (named) by brand and model (eg Mettler PR5002). Dan commented that might be confusing if more than one of these balances were in use.
    - Balances were given unique names (Shaggy and Scooby)

EPA Audit Review

- Archival of logbook pages
  - Analytical balance logbook pages were not archived on a regular basis. Study specific information (sample weight) was not archived at the close of the study. Copies of balance log were placed in archive, but years worth of raw data could be in the balance log.

"STIMPY"
Mettler Model PR 5002 Balance (0-5100) g
Serial # 1118311149

Date	Initials	Material Weighed	Sample Weight (g)	Study #	Description*
12/15/11	BH	Bal Check, Cork Ring + 50mL tube + 1g	1.00	09289	Bal Check OK
12/15/11	BH	CA19 O 21655	1.0	09289	5X, Quinoxyfen / Tomato
12/15/11	BH	CA19 P 21656	1.0	09289	1X
12/20/11	BH	Bal Check, Cork Ring + 50mL tube + 1g	1.00	09289	Bal Check OK
12/20/11	BH	CA17A 21769	1.0	09289	3X, Quinoxyfen / Tomato
12/20/11	BH	CA18A 21773	1.0	09289	1X
12/20/11	BH	CA19A 21610	1.0	09289	1X
12/20/11	BH	CA19M 21651	1.0	09289	1X
12/20/11	BH	CA20A 21614	1.0	09289	1X
12/20/11	BH	GA*01A 21492	1.0	09289	1X
12/20/11	BH	CA17C 21771	1.0	09289	1X
12/20/11	BH	CA17D 21772	1.0	09289	1X
12/20/11	BH	CA18C 21777	1.0	09289	1X
12/20/11	BH	CA18D 21778	1.0	09289	1X
12/20/11	BH	CA18E 21775	1.0	09289	1X
12/20/11	BH	CA18F 21776	1.0	09289	1X
12/20/11	BH	CA18G 21779	1.0	09289	1X
12/20/11	BH	CA18H 21780	1.0	09289	1X
12/20/11	BH	CA18I 21781	1.0	09289	1X

* **IMPORTANT**: All operations and maintenance are routine and SOPs followed unless otherwise noted.
Indicate when non-routine maintenance/repair occurs; describe nature of the defect, how and when the defect was discovered and any remedial action taken in response to the defect.

EPA Audit Review

- Archival of logbook pages
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    - Study specific data (sample weights) would be captured on sample analysis sheets and balance log would capture daily calibration.
    - Balance log will be archived regularly.

EPA Audit Review

- ASR QA statement.
  - Dan felt the QA statement in the ASR was not needed and generally was not read by inspectors. He suggested that the QA statement in the final report would cover all of the contributing scientist reports.
    - This is beyond our pay grade, but will make IR-4 HQ aware of Dan's comments.

EPA Audit Review

- End of inspection
  - No significant adverse findings observed.
  - Dan asked for comments on pilot program.
    - With only one day of onsite inspection the time for questions and discussion is greatly reduced.
    - We asked if they would accept data in electronic form (pdf) instead of photocopying everything.
      - Dan said yes. Plus he wondered what they were going to do with all the data in boxes in their office in Denver.

EPA Audit Review

- QA comments on audit (Martin).
  - Routing forms and QA statements.
  - Other comments.

Non-GLP Standards

- In recent years, the use of Non-GLP standards has increased.
  - Registrants have supplied standards from ChemService, Sigma-Aldrich, etc. or have simply said to purchase the standards.
    - Typically these standards come with a COA, but no GLP certification.
- So what's a chemist to do??

Non-GLP Standards

- Document communications with registrant.
- Make sure Study Director is aware of the situation (cc on emails with registrant).
  - Note: Study Director cannot approve the use of the Non-GLP standard. He/she must get approval from IR-4 management.
- Try to obtain any characterization data from the supplier.
- Make arrangements to store standard for life of registration.