

MICROBIOLOGY DEPARTMENT

STANDARD OPERATING PROCEDURE

STRICTING OF EXTERNE		
Department: Microbiology	SOP No.:	
Title: Handling of Microbial Excursion in Water and Environment	Effective Date:	
Supersedes: Nil	Review Date:	
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1.0 OBJECTIVE:

To lay down the Procedure for Handling of Microbial Excursion in Water and Environment.

2.0 SCOPE:

This SOP is applicable for excursions from alert/action/specified limits as defined in the environmental monitoring program for all dosage from (sterile and non sterile) and aseptic manufacturing areas and microbial excursions from alert/action/specified limits of purified water, WFI and Pure steam condensate in Microbiology Section of Quality Control Laboratory.

3.0 **RESPONSIBILITY:**

Officer / Executive – Microbiology

4.0 ACCOUNTABILITY:

Head - QC

5.0 ABBREVIATIONS:

ADDREVIATIO	T	D•
BET	:	Bacterial Endotoxin Test
CAPA	:	Corrective and Preventive Action
Cfu	:	Colony Forming Unit
GPT	:	Growth Promotion Test
HVAC	:	Heating Ventilation and Air Conditioning
HQC	:	Head Quality Control
NA	:	Not Applicable
No.	:	Number
PSC	:	Pure Steam Condensate
QA	:	Quality Assurance
QC	:	Quality Control
RH	:	Related Humidity
SOP	:	Standard Operating Procedure
TVAC	:	Total Viable Aerobic Count
TMC	:	Total Microbial Count
TFC	:	Total Fungal Count
Temp.	:	Temperature
WFI	:	Water for Injection
ΔP	:	Differential Pressure

6.0 PROCEDURE:

6.1 **DEFINITION:**

6.1.1 Standard Operating Procedure (SOP): A written authorized procedure, which gives instructions for performing operations.



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- **6.1.2 Microbiological Identification:** Biochemical characterization of isolated colonies to determine the isolate genus and where feasible and appropriate the species.
- **6.1.3 CAPA:** Corrective and Preventive action, a systematic approach that includes actions needed to correct (correction), prevent recurrence ("Corrective Action"), and eliminate the cause of potential non conforming product and other quality problems (preventive action).
- **6.1.4** Alert Limit: An established microbial or airborne particle limit giving early warning of potential drift from normal operating conditions and triggers appropriate scrutiny and follow-up to address the potential problem. Alert limit are always lower than action limit.
- **6.1.5** Action Limit: An established microbial or airborne particle limit that, when exceeded, should trigger appropriate investigation and corrective preventive action based on the investigation.
- **6.1.6 Specified Limit:** An specified microbial or airborne particle limit that, when exceeded, should trigger appropriate investigation and corrective action and preventive action based on the investigation.
- 6.1.7 Immediate action: A response taken to an excursion.
- **6.1.8** Corrective Action: Action to eliminate the cause of a detected nonconformity or other undesirable situation.
- **6.1.9 Preventive Action:** Action to eliminate the cause of a potential nonconformity or other undesirable situation.
- **6.1.10 Critical Area:** An area designed to maintain sterility of sterile materials. Sterilized product, containers, closures and equipment may be exposed in critical areas.
- **6.1.11 Colony Forming Unit (cfu):** A microbiological term that describes the formation of a single macroscopic colony after the introduction of one or more microorganism to microbiological growth media. One colony forming unit is expressed as 1 cfu.
- **6.1.12 Laboratory error:** An error associated with the performance of a test procedure or due to laboratory instrument failure.
- **6.1.13 Hypothesis/Investigative Testing:** Testing is performed to help confirm or discount a possible root cause i.e. what might have happened that can be tested: for example it may include further testing regarding sample filtration, sonication /extraction; and potential equipment failures etc. Multiple hypotheses can be explored.

6.2 PROCEDURE:

- **6.2.1** If there is any excursion observed in environmental monitoring and water samples microbiologist shall initiate the intimation as per **Annexure-VI** (Notification of Excursion) to QA.
- **6.2.2** Notification Criteria: Intimate for alert/action/specified limit excursion when:
 - Alert limit is exceeded



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- Action limit is exceeded
- Specified limit is exceeded
- **6.2.3** If microbial result exceeds the alert limit, constitute a warning and do not necessary require a corrective action. However, sampling point shall be monitored for three consecutive days.
- **6.2.4** Water Sampling shall be done from the affected point(s), generation, storage and return loop sampling point.
- **6.2.5** If water system microbial result exceeds action limit, an immediate corrective action shall be taken to bring the process back to normal operating range.
- **6.2.6** In case alert limit excursions observed three times in succession from the same location, same shall be treated as action limit excursion.
- **6.2.7** In case of any excursion observed from the microbial alert/action/specified limits in Environment monitoring and water samples; inform concerned department Manager/Designee, Quality Control Head/Designee, Quality Assurance Head/Designee, and Production Head/Designee through **Annexure-VI** (Notification of Excursion).
- **6.2.8** Executive/Officer-QA shall enter the details of excursion in excursion logbook.
- **6.2.9** Result of excursion in Water/Environmental Monitoring shall be documented in **Annexure-V** and Notification Number shall be generated by Quality Assurance.
- 6.2.10 Assign the Notification Number as follows; "XX/TOE /YY/NNN"

Where,

XX: Denotes Facility Code

TOE: Denotes type of Excursion (EME for Environment Monitoring Excursion and WME indicating Water Excursion)

YY: Denotes year, i.e. 21 for 2021.

NNN: Denote to serial Number of allotted notification.

- **6.2.11** The product manufactured on the day when action limit exceeds shall be kept under hold till the completion of investigation. Head- Quality Assurance (Head-QA) shall take appropriate decision regarding the release/rejection.
- **6.2.12** After creation of a **"Notification of Excursion"** a sequential detailed Phase I Investigation process shall be conducted to determine the root cause.
- **6.2.13** Each step of the investigation process shall be clearly defined, including the number of replicates and the outcome of each investigational step shall be evaluated.

6.3 IDENTIFICATION OF THE MICROORGANISMS AND ITS SOURCE:



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- **6.3.1** Micro flora observed during environmental monitoring and water samples shall be isolated as per SOP.
- **6.3.2** Convey the information about identified microorganism to the head of the affected area through Annexure-VII "Identification of microorganism".
- **6.3.3** Operating Manager Micro/Designee with the concerned Microbiologist shall conduct laboratory Investigation.

6.4 PHASE-I INVESTIGATION: (INVESTIGATION OF MICROBIOLOGY LABORATORY)

- **6.4.1** Initiate investigation as per **Annexure-VIII** (in case of three times alert excursion in succession from the same location/action limits in the settle plate samples, active air samples, contact plate samples (wall/floor/surface), swab samples, personnel monitoring samples and water testing) for determine the root cause (But not limited to).
- **6.4.2** Operating Manager Micro shall investigate for potential laboratory errors which can occur while analysis.
- **6.4.3** Check if samples were incorrectly stored at inappropriate temperature or containers are not properly closed or possibly not sampled in the correct designated sampling container.
- **6.4.4** Investigation in the microbiology laboratory shall a review of relevant records as per the **Annexure-VIII.** Record observation in the given space in 'Observation' column. Wherever the observations are not complying, give details.
- 6.4.5 Check for the sampling error, ensure the sampling is done as SOP correctly.
- **6.4.6** Quality Assurance shall give the approval for Re sampling of water samples.
- **6.4.7** Retesting shall be performed by two microbiologists.
- **6.4.8** The microbiologist who performed the original testing shall be preferably selected to perform reanalysis as one of the analyst.
- **6.4.9** If found that the person made error in any of the particular microbiological testing or aspects, training shall be imparted to the responsible person and necessary evaluation shall be taken.
- **6.4.10** If laboratory error found or any mechanical failure is identified inform to Head-Quality Assurances (Head-QA) to Document the corrective action taken and perform the re-analysis (if required).
- **6.4.11** If results of re-analysis are complying (within the appropriate limit individually), then the initial results shall be invalidated and substituted with the average of retest results, conclude the investigation with the probable root cause.
- **6.4.12** If cause of excursion is identified at laboratory limit, carry out corrective action and re-analyze (if required)
- **6.4.13** If cause of excursion is not identified at the laboratory limit, than forward the investigation report to Quality Assurance for investigation in the production or concerned area.



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6.5 PHASE-II INVESTIGATION: (INVESTIGATION OF MANUFACTURING FACILITY)

- **6.5.1** Phase-II investigation team shall be identified by Head QA from QA, QC, Microbiology, Production, Engineering, SME, etc. as appropriate.
- **6.5.2** On receipt of the Phase-I Laboratory Investigation report from microbiology lab, investigate the cause of excursion as per **Annexure-IX** "Investigation of Microbial Excursion in Water" (PW/WFI/PSG, and as per **Annexure-X** "Investigation of Microbial Excursion in Environment".
- **6.5.3** Phase-II Investigation will include review of following records (but not limited to):
 - Cleaning and sanitization
 - Changing of filters/ regeneration records
 - Disinfectant qualification record
 - Area cleaning sanitization record
 - Personnel qualification record
 - Area Qualification reports
 - HVAC qualification
 - Storage and distribution
 - Pretreatment and purification system and document of production parameters
 - Other checks on the generation and distribution system.
- **6.5.4** Identify the root cause or most probable cause.
- **6.5.4.1** Executive/Officer-Microbiology, Head QA and Head production will make complete review of trend data (Environment or Water) and other information & comments regarding the trend data.
- **6.5.4.2** Based on the location of excursion and the type of sample, following are the suggested additional investigational checks but not limited to:
 - Review aseptic technique of personnel.
 - Evaluate mechanical equipment in area as possible source of contamination.
 - Evaluate integrity of the room (e.g. peeling paint, cracks in ceiling, walls and floor)
 - Investigate for possible sources of contamination.
- **6.5.4.3** If the investigation reveals the source or probable source of contamination, identify the root cause and plan appropriate corrective & preventive action.
- **6.5.4.4** If cause for excursion cannot be identified and excursions are occurring repeatedly, check the integrity of filters of the HVAC system of the affected area. An aseptic process stimulation (media fill) may be required.
- **6.5.4.5** If production is discontinued under impact assessment, it shall be commenced once the environmental results of the aseptic processing area/personnel are within the alert/action limits.
- **6.5.5** Investigation report shall be closed within 30 working days of its initiation. In case the report is not closed, an interim report shall be prepared with the justification for extension and new proposed timelines. Fill Extension form as per **Annexure-XI**. If any extension required.



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6.5.6 Corrective Action and its implementation for Microbial Excursion in Water:

- **6.5.6.1** Plan appropriate corrective action such as flushing of the storage tank and the distribution loop, sanitization of the storage tank and distribution loop, quarantining the product, Area cleaning and fumigation etc.
- **6.5.6.2** After implementation of corrective action, collect samples (if required) from the particular usage point, return and supply of the water storage and distribution system and send it for analysis.
- 6.5.6.3 Record the details in the respective sampling log/register.
- **6.5.6.4** Based on the QA approval water usage may be stopped in the production to identify the failure and any further risk to the product.
- **6.5.6.5** If the re-sample of water taken meets the requirements of the test within the limits appropriate for the parameters. Resume the usage of water/steam.
- **6.5.6.6** If the sample still fails, plan further corrective action which may include checks and sampling at the pre-treatment stages and the generation and purification stages.
- **6.5.6.7** After appropriate corrective action, again sample from the same user point, return and supply of the storage and distribution system.
- **6.5.6.8** Based on the impact assessment, the sampling location can be increased.
- **6.5.6.9** If the results of retesting is complying (Within the appropriate limits), usage of water can resumed.
- **6.5.6.10** Appropriate decision regarding the release/rejection of the product manufactured on the day of excursion shall be taken by Head- Quality Assurance (Head-QA).
- **6.5.6.11** Provide the details of the investigation in chronological order. Assess the impact of water used during the period of excursion.
- 6.5.6.12 Any discussion that review data and make recommendations should be documented.

6.5.7 Corrective Action and its implementation for Microbial Excursion in Personnel Monitoring:

- **6.5.7.1** When the results from personnel monitoring and finger dabs are found to exceed alert(three times) or action limit and objectionable organisms are recovered when identified as per identification of isolates SOP, record the detail with appropriate operator/ personnel name in specific format attached with environmental monitoring reports and inform to production department/concern department.
- **6.5.7.2** If a person exceeds action limit, he/she shall not be allowed to enter the critical area and shall be re-qualified as per respective SOP and shall be only allowed to enter after successful completion of qualification program.
- 6.5.8 Corrective Action and its implementation for Microbial Excursion in Environment Monitoring:



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- **6.5.9** If the notification for Environmental Monitoring results exceeding alert for three consecutive days or action limit then based on sampling location (Critical/Non-critical) further decision for stopping of production can be taken by Head-Quality Assurance (Head-QA) and appropriate corrective action shall be taken as given below (but not limited to).
 - Extensive cleaning and sanitization with disinfectant.
 - Fogging of area if required
 - Re-training/Qualification of the personnel if count are exceeding in personnel monitoring.
- **6.5.10** If production is stopped, production activity shall be resumed after getting satisfactory results for 3 consecutive days of the environmental monitoring.
- **6.5.11** If the objectionable organism is repeatedly identified, appropriate corrective action shall be taken as given below (but not limited to).
 - Source of contamination to be studied.
 - Possibility of impact on product in filling areas.
 - Extensive mopping with disinfectants. If appropriate, disinfectants with specific activity such as sporocidal can be used.
 - Fumigation of area.
 - Re-training & Qualification of the personnel if recovered in personnel monitoring.
- **6.5.12** If the results of Environmental monitoring for 3 consecutive days found satisfactory production activity shall be resumed.
- **6.5.13** Appropriate decision regarding the release/rejection of the product manufactured on the day of excursion shall be taken by Head- Quality Assurance (Head-QA).

6.6 TRENDING OF EXCURSION RESULTS:

6.6.1 Prepare the trends of Excursion on yearly basis by QA with Bar / Pie chart for better understanding to identify contributory factor causing Excursion test results i.e. Analyst, Instrument, Product/Material, Inconclusive for review and recommendation as per format in "Trending of Excursion Data" as shown in **Annexure –XII**.

7.0 ANNEXURES:

ANNEXURE No.	TITLE OF ANNEXURE	FORMAT No.
Annexure-I	Flow chart for Microbiological Monitoring Excursions	
Annexure-II	Flow chart for Investigation of Environment Monitoring	
	Excursion.	
Annexure- III	Flow Chart for investigation for Water Excursion (TVAC)	



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Annexure- IV	Flow chart for investigation for water excursion (Bacterial
	Endotoxin Test)
Annexure-V	Result of Excursion in Water/Environment/Personnel
	Monitoring
Annexure- VI	Notification for Excursion
Annexure-VII	Identification of Microorganism
Annexure- VIII	Investigation of Microbial Excursion in Water/
	Environment
Annexure- IX	Investigation of Microbial Excursion in water
	(PW/WFI/PSG/Raw). (Phase-II Investigation)
Annexure- X	Investigation of Microbial Excursion in Environment.
	(Phase-II Investigation)
Annexure- XI	Extension form for Investigation of Microbial Excursion
	in water / Environment.
Annexure- XII	Trending of Excursion Data

ENCLOSURE: SOP Training Record

8.0 **DISTRIBUTION:**

• Controlled Copy No. 01	Quality Assurance
• Controlled Copy No. 02	Microbiology
Master Copy	Quality Assurance

9.0 **REFERENCES**:

• USP Chapter No. 1116 PDA TR#13

10.0 REVISION HISTORY:

CHANGE HISTORY LOG

Revision	Change	Details of Changes	Reason for	Effective	Updated
No.	Control No.		Changes	Date	By

ANNEXURE I

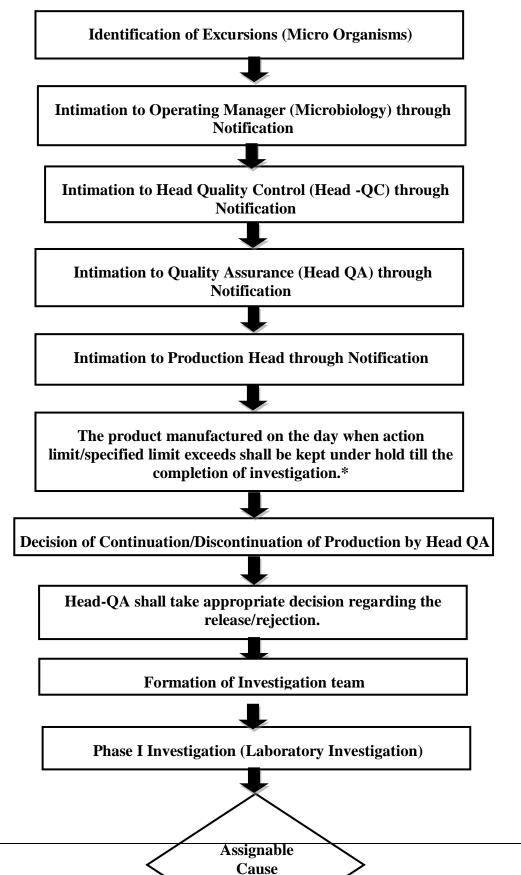
FLOW CHART FOR MICROBIOLOGICAL MONITORING EXCURSIONS

Observation and Reporting



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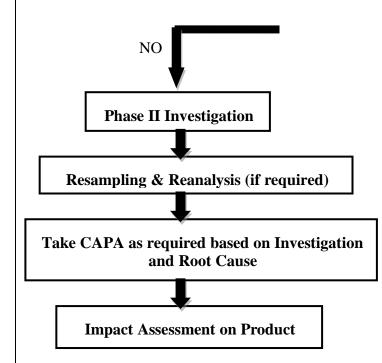
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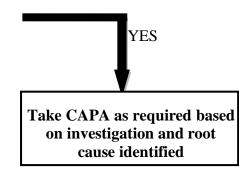




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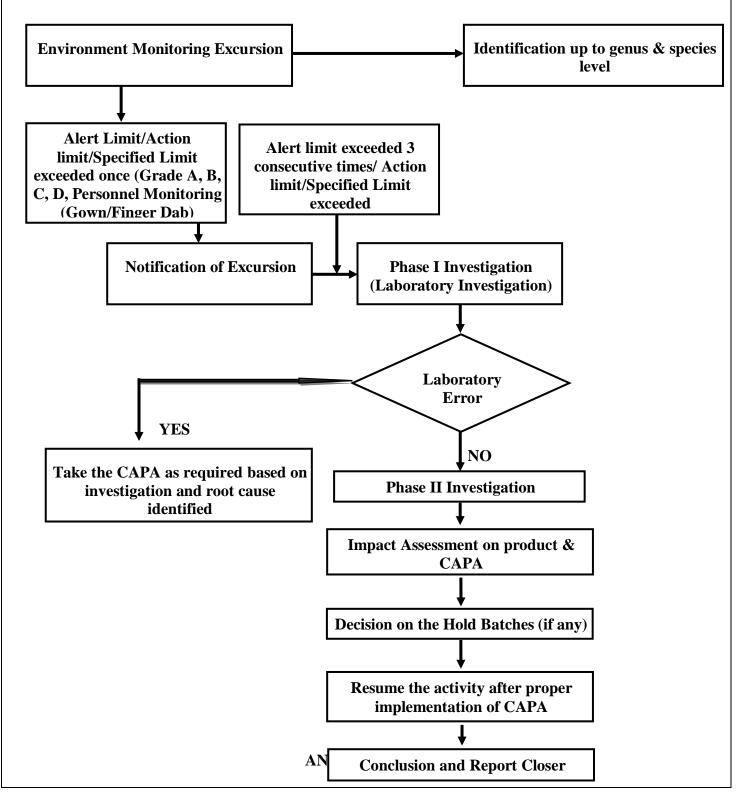


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ANNEXURE II

FLOW CHART FOR INVESTIGATION OF ENVIRONMENT MONITORING EXCURSIONS



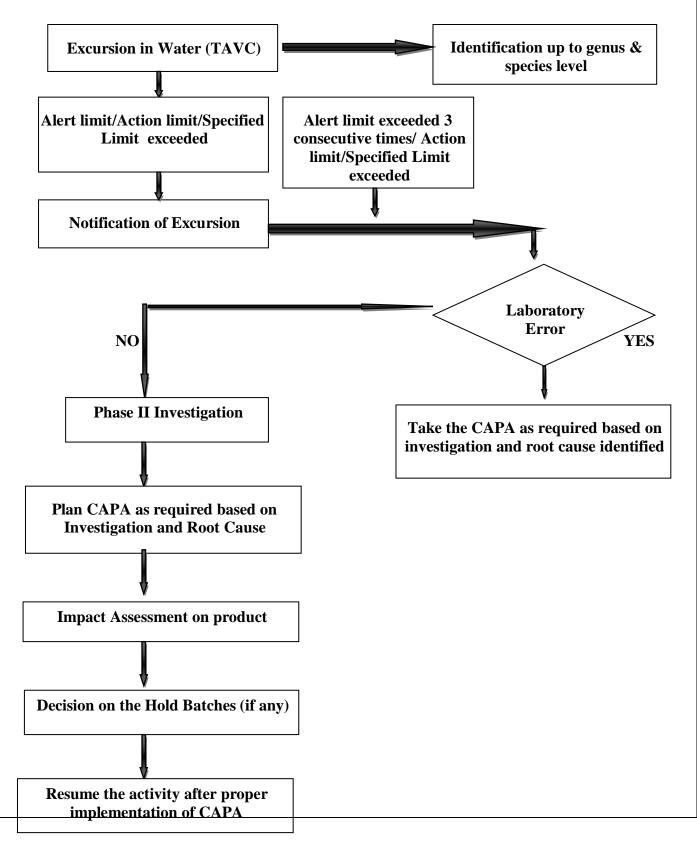


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FLOW CHART FOR INVESTIGATION OF WATER EXCURSION (TAVC)

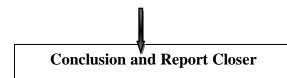




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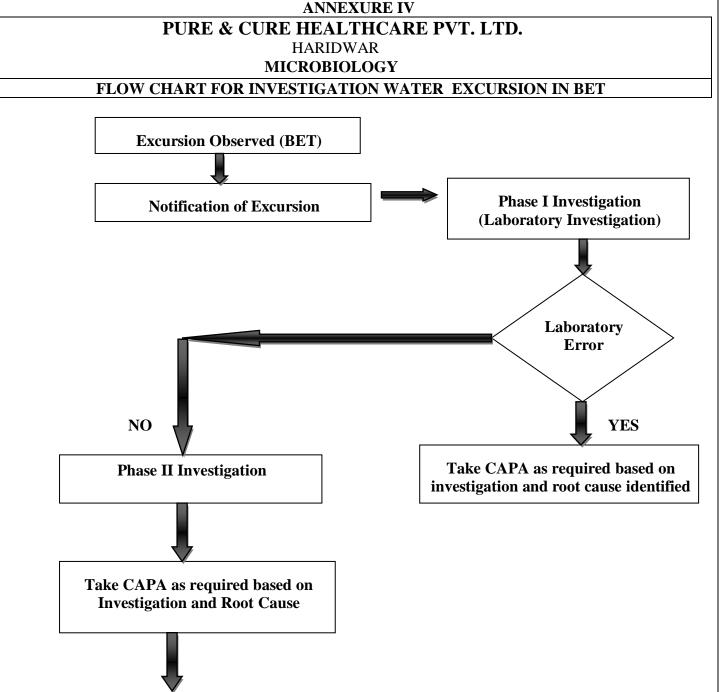
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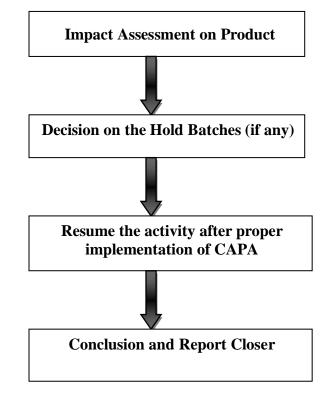
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ANNEXURE V RESULT OF EXCURSION IN WATER/ENVIRONMENT/ PERSONNEL MONITORING

-			Type of Sample(Wa	Sampling			Limits		Res	ult Obser	ved	Investigation	CAPA		
Date of Notification	Notification No.	Name of facility		Point ID./ Location ID	A.R. No./ Lot No.	Alert	Action	Specified	TBC	TFC	ТМС		Recommended (Y/N)	Initiate by (Sign/Date)	Reviewed By (Sign/Date)





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				ANNEXURI ATION FOR		SION				
From: QC-Mic	robiology									
Date of Analysis		Type of Excursion		Date of Wate Monitoring	er Samplin	g/				
Type of Analysis		Date of Observation	Sample Analysed By: / Monitoring done By: Name/Date					Result Observed By Name./Date		
Details of Excur		to vin a (Watan Communa)								
S. N.	Area	toring/ Water Sample) Sampling Point ID./Location ID.	Lot. No./ A.R No.	. Observ	vations	Alert limit	Act	ion Limit	Spec	ified Limit
(Personnel Moni	itoring)									
S. N.	Name of the Person	Location	Observations (cfu)) Alert limit		Act	tion Limit	Specifi	cation Limit
Operating										
Manager- Micro (Sign./Date)			Head Quality (Sign./D							
Head Quality Assurance			Head Prod	luction						





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ANNEXURE VII IDENTIFICATION OF MICROORGANISM

Notification No.		
Production Facility/Area		
Method of Identification		
Name of Organism Identified (Att	ach report):	
Probable Source of identified orga	anism (Attach literature Reference,	(if any):
Prepared By:	Verified By :	Approved By:
Microbiologist	Operating Manager-Micro	Head-QC



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ANNEXURE VIII

INVESTIGATION OF MICROBIAL EXCURSION IN WATER / ENVIRONMENT

PHASE I MICROBIOLOGY LABORATORY INVESTIGATION

1. Investigation report for Excursion from Action Limit in PW/WFI/PSG/Raw Water							
Notification No.:							
Name of facility	Type of Water		r		Sampling Point/		
	Sampling				Location		
Lot. No./ A.R. No.	Date of Sampli		ling	Date of T		esting	
Date of observation		Alert Limit			Action Limit		
Analysed By:		Count Observ	ved By		Sampled By		
					(Name)		
A. Investigation for v	vater Excu	rsion in TVAC	/ Pathog	en : 🗆 Applica	ble/ □ Not	Applicable	2
Dehydrated Media Lot.							
No. & Expiry			Media GPT		\Box Not Co	-	
						\Box Not Ap	plicable
Autoclave cycle no. of				lave cycle no. o	-		
media used for testing				used for testing			
eg. R2A/ SCDA			SCDM	I/Peptone Wate	er		
Nature of prepared							
media, Physical	\Box Not Co	pplicable Pre Incubation Condition (if					
appearance of solid/	\Box Not Ap						
liquid medium such as					\Box Not Co		
• Cracked containers or				\Box Not Ap	plicable		
lids							
•			01				
				vation of any	1 4	C 1	
Nature of contamination				ninations in the	-	\Box Compli	
if any in pre incubated			`	media lot) used		\Box Not Co	
plates				amples of same rother days.	e day	\Box Not Ap	plicable
Any unusual				i other days.			
observation during							
preparation of media (in						🗆 Compli	
dehydrated, upon	\Box Not Co		-	ve Control of		\square Not Co	
reconstitution &	\square Not CC		SCDM	I/R2A/SCDA/I	Dilutions	\Box Not Co	
dissolution, pH) storage		phease					phease
and usage.							
		ies				🗆 Compli	ies
Growth promotion test	\Box Not Co		pH of	Media		\Box Not Co	
results of used media	\Box Not Ap	-	F			\Box Not Ap	-
0.45µ membrane		÷	Was th	nere any crack,			
negative control on agar	\Box Not Co			per closures ob	served in	\Box Not Co	
media.	□ Not Ap	1		npling containe		🗆 Not Ap	-
	· · ·		•	- -			-



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Environment Monitoring of LAF (Used for analyzing the samples under investigation) settle plate results and active air sampling results (3 days)	 Complies Not Complies Not Applicable 	 Environment Monitoring of associated and background environment (Used for analyzing the samples under investigation) Settle plates and Active air sampling results (3 days) 	 □ Complies □ Not Complies □ Not Applicable
Trend analysis of environment monitoring of the LAF and background area	 Complies Not Complies Not Applicable 	Results of TVAC/Pathogen 3 days earlier	 Complies Not Complies Not Applicable
Power failure during testing	□ Yes □ No	Preparation and sterilization of accessories	 □ Complies □ Not Complies □ Not Applicable
Analyst Training (Microbiologist)	 □ Complies □ Not Complies □ Not Applicable 	Verification of Sterilization load	□ Complies □ Not Complies □ Not Applicable
Analyst Qualification	 □ Complies □ Not Complies □ Not Applicable 	Review of periodic cleaning of pre filter	 □ Complies □ Not Complies □ Not Applicable
Any previous history of the sample under investigation, analyst involved in testing	 Complies Not Complies Not Applicable 	Ensure the samplings done as per SOP.	 □ Complies □ Not Complies □ Not Applicable
Sampling bottles sterilization	 □ Complies □ Not Complies □ Not Applicable 	Qualification/Validation of sterilization process	 □ Complies □ Not Complies □ Not Applicable
Qualification/Validation of LAF	 Complies Not Complies Not Applicable 	SOP and standard testing procedure adopted for the testing of samples under investigation	 □ Complies □ Not Complies □ Not Applicable
Any unusual observation during sampling (to be verified by means of an interview with the analyst, who has done the sampling)	 □ Complies □ Not Complies □ Not Applicable 	Other observation(if any)	
Interview of person for potential cause (attach report if required) Investigation Evaluation Summary:	 Complies Not Complies Not Applicable 		



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Heating Block/Plate temperature	 □ Complies □ Not Complies □ Not Applicable 	BET Incubator/ calibration done on	
BET Incubator/ next calibration due on		Analyst qualification record done as on date	 □ Complies □ Not Complies □ Not Applicable
Verification sterilization parameter	 Complies Not Complies Not Applicable 	Interview of person for potential cause (attach report if required)	 □ Complies □ Not Complies □ Not Applicable
Depyrogenation of the glassware used in the preparation of samples and reagents	 Complies Not Complies Not Applicable 	Evaluation of Product Positive Control and Product Negative Control etc.	 □ Complies □ Not Complies □ Not Applicable
Evaluation of the validity of reagents	 Complies Not Complies Not Applicable 	Confirm whether Limulus Amoebocyte Lysate(LAL)/ Control Standard Endotoxin/LAL Reagent Water was stored at correct temperature	 □ Complies □ Not Complies □ Not Applicable
Confirm whether dry heat sterilizer (DHS) has been Calibrated/ Qualified and its temperature monitoring on routine basis	 Complies Not Complies Not Applicable 	Confirm whether reconstitutated Limulus Amoebocyte Lysate(LAL)/ Control Standard Endotoxin/LAL Reagent Water was used with in their shelf life.	 □ Complies □ Not Complies □ Not Applicable
Confirm whether test for confirmation of labeled lysate sensitivity of LAL reagent was within Acceptance criteria. Any other parameters (if any)	 Complies Not Complies Not Applicable 	 Complies Not Complies Not Applicable 	 □ Complies □ Not Complies □ Not Applicable
Investigation Evaluation Summary			
2. Investigation for Environment Monitoring: Applicable/ Not Applicable Steam Sterilizer Steam Sterilizer Validation done on Steam Sterilizer Validation			
Result of steam sterilizer	□ Complies	Steam Sterilizer validation	



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validation	□ Not Complies	due on	
Deviation if any (To be	\Box Yes	Media name & Lot No. used	
compare with previous	□ No	for environment monitoring	
case		for environment monitoring	
Validity period of		Date of media sterilization	
sterilized media		Date of media stermzation	
Sterilization cycle no.		Media plate prepared by (Name)	
Status of Negative control	 □ Complies □ Not Complies □ Not Applicable 	Review the sterilization cycle parameters	 □ Complies □ Not Complies □ Not Applicable
Review the result of media GPT	 □ Complies □ Not Complies □ Not Applicable 	Lot No./ used before of pre sterilized petriplates.	
Pre-incubation of media		Review of training records of	Complies
plates completed (Date)		concern	□ Not Complies
plates completed (Date)		person/Microbiologist	Not Applicable
Preincubation of media plates started (date)		Preincubation of plate status (any contamination found)	 □ Complies □ Not Complies □ Not Applicable
Review of microbial	Complies		
monitoring result of media preparation room is within the alert limit on the day of media prepared.	 Not Complies Not Applicable 	Name and concentration of sanitizing/cleaning agent used.	
Area cleaning & sanitization done as per SOP	 □ Complies □ Not Complies □ Not Applicable 	Review the area qualification record	 □ Complies □ Not Complies □ Not Applicable
Interview of person for potential cause (attach report if required)	 □ Complies □ Not Complies □ Not Applicable 	Ensure the samplings done as per SOP.	 □ Complies □ Not Complies □ Not Applicable
Review the Environment condition plate preparation room (Temp., RH & DP)	 □ Complies □ Not Complies □ Not Applicable 	disinfectants used	□ Complies □ Not Complies □ Not Applicable
Review the viable	Complies		- Complian
microbial monitoring	□ Not Complies	Review of Non viable count if	□ Complies
trends of microbiology	□ Not Applicable	required	□ Not Complies
laboratory (Two Months).			□ Not Applicable
Verify the entry exit	Complies	Deview the procedure edented	- Complian
procedure for	□ Not Complies	Review the procedure adopted	□ Complies
microbiology area weather	□ Not Applicable	to perform the test was correct	□ Not Complies
the entry made correctly.	**	or not	□ Not Applicable
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Review the isolate and their source and there occurrence with other type of tests such as bio- burden, microbial limit test, sterility test and water analysis.	 Complies Not Complies Not Applicable 	Check the any similar observation occurred previously, their investigation and corrective action taken.	□ Yes □ No
Review the cleaning & sanitization status of transportation containers.	 □ Complies □ Not Complies □ Not Applicable 	Sterilization date of peptone water bottle	
Container sterilization cycle no./ sterilization done		Sterilization date of air sampler sieve	
air sampler sieve sterilization cycle no.		Sterilization cycle parameter (Container/Air sampler sieve)	 Complies Not Complies Not Applicable
Microbiology department HVAC validation due on		Result of HVAC validation	 Complies Not Complies Not Applicable
Deviation in HVAC Validation (if any)	□ Yes □ No	To check microbiologist qualification record	 □ Complies □ Not Complies □ Not Applicable
To check environmental reports other than the failure report for previous excursion (if any).	 □ Complies □ Not Complies □ Not Applicable 	Check the sterilization status of the materials used for test was correct eg. Media, filter paper, water, swab, saline etc.	 □ Complies □ Not Complies □ Not Applicable
Check the history of data	 □ Complies □ Not Complies □ Not Applicable 	Review of isolated organism Obtained with previous history	
Review report of the laminar flow lab and the other testing reports of microbiology lab.	 Complies Not Complies Not Applicable 	Review for occurrence of any particular intervention in microbiology lab	 Complies Not Complies Not Applicable
Investigate whether performance of any equipment or training of personnel or use of apparatus have not affected the results of the tests performed at that time. Corrective action and	 Complies Not Complies Not Applicable 	Any other cause/points for excursion	
preventive action (Mentioned CAPA taken,			



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in brief also mention			
CAPA reference No.			
Assignable cause found/			
not found initiate the			
second phase			
investigation.			
Investigation Evaluation			
Summary:			
Conclusion:			
Microbiologist (Sign./Date)	Operating Manager-Micro (Sign./Date)	Head-QC (Sign./Date)	Head-QA (Sign./Date)



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ANNEXURE IX

INVESTIGATION OF MICROBIAL EXCURSION IN WATER (PW/WFI/PSG/RAW) (PHASE-II INVESTIGATION)

PHASE- II PRODUCTION AREA INVESTIGATION			
Notification No.:			
1. Potable Water Treat		ot Applicable	
Check the chlorination/ disinfection treatment	 Complies Not Complies Not Applicable 	Check the SMBS dosing	 Complies Not Complies Not Applicable
Check the Hardness of water	 □ Complies □ Not Complies □ Not Applicable 	Verify the Ion exchange parameters	 □ Complies □ Not Complies □ Not Applicable
Check the effectiveness of filtration	 □ Complies □ Not Complies □ Not Applicable 	Cleaning frequency of raw water storage tank	 Complies Not Complies Not Applicable
Any other parameters if required (As per water treatment system)	 Complies Not Complies Not Applicable 	Any unusual observation incidence occurs	□ Yes □ No
Training record of Concern person	 □ Complies □ Not Complies □ Not Applicable 		
2. Purified water Genera	tion, Storage and Distri	bution System: Applicable/ N	Not Applicable
Last sanitization done on		Check the online conductivity for any abnormal trend in purified water/WFI.	 □ Complies □ Not Complies □ Not Applicable
Check for any leakage in Purified water/WFI Generation system.	 Complies Not Complies Not Applicable 	Check for calibration status of temperature, conductivity from the set limit for last 7 days of storage tank.	 □ Complies □ Not Complies □ Not Applicable
Check the trend of TVAC return loop water	 □ Complies □ Not Complies □ Not Applicable 	Check the change in conductivity from the set limit for last 7 days of storage tank	 □ Complies □ Not Complies □ Not Applicable
Check for the change in conductivity from the set limit for last 7 days of return loop	 Complies Not Complies Not Applicable 	Check for the change in velocity from the set limit for last 7 days	 Complies Not Complies Not Applicable
Check for UV parameters as per limit	 Complies Not Complies Not Applicable 	Check for the decrease in water limit below the limit for last 7 days.	 Complies Not Complies Not Applicable
Check for the last vent filter integrity done on	 Complies Not Complies 	Check for any maintenance work done/date	



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& test results	Not Applicable		
Chaok for any lookage	Complies	Values of critical parameters	Complies
Check for any leakage	□ Not Complies	of RO system are as per the set	Not Complies
in distribution system	□ Not Applicable	limit	□ Not Applicable
	**	Any unusual observation	
Any other Parameters		incidence Occurs	
Interview of operator	🗆 Yes		- Complian
for potential cause	🗆 No	Training Record of Concern	\Box Complies
(Report attached if		person	□ Not Complies
required)		1	□ Not Applicable
	orage and Distribution Sy	ystem:	licable
Check for any	□ Complies		Complies
abnormal trend of	□ Not Complies	Check for any critical alarm	□ Not Complies
distillate conductivity	\Box Not Applicable		\Box Not Applicable
Check for any			
maintenance work	\Box Not Complies	Check for leakage if any	\Box Not Complies
done	\Box Not Complicable	Check for leakage if any	\Box Not Complicable
uone			
Last sanitization done		Check for the operation as per	1
on		defined set parameter	□ Not Complies
	<u> </u>		\Box Not Applicable
Check for any	\Box Complies	Check for the change in	\Box Complies
abnormal trend of	□ Not Complies	temperature from the set limit	□ Not Complies
distillate temperature	□ Not Applicable	for last 5 days of storage tank	□ Not Applicable
Check the decrease in		Check for the last vent filter	□ Complies
water limit below the	□ Not Complies	integrity done on & test results	Not Complies
limit for last 7 days	Not Applicable	integrity done on a test results	Not Applicable
Check for calibration	Complies	Check for the change in	Complies
status of temperature,	□ Not Complies	conductivity from the set limit	\Box Not Complies
conductivity &	\Box Not Complicable	for last 7 days of return loop.	\Box Not Applicable
pressure sensors		for last 7 days of feturin loop.	
Check for the change	Complies	Check for any leakage in	Complies
in velocity from set	□ Not Complies		Not Complies
limit for last 7 days.	Not Applicable	distribution system.	Not Applicable
Check for the change			C 1'
in conductivity from	\Box Complies	Check for the change in	\Box Complies
the set limit for last 7	□ Not Complies	temperature from the set limit	□ Not Complies
days of storage tank	□ Not Applicable	for last 5 days of return loop	□ Not Applicable
Any maintenance			
work done/date		Any Other Parameter	
Any unusual		Interview of operator for	•••
observation incidence	\Box Yes	potential cause (Report	\Box Yes
occurs	🗆 No	attached if required)	□ No
Training record of	Complies		
Framing record of		1	<u> </u>



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concern person	□ Not Complies□ Not Applicable				
Investigation Evaluation	n Summary:				
4. Pure Steam Generati	on System: □ Applicable	/ □ Not Applicable	;		
Check for any abnormal trend of distillate conductivity	 Complies Not Complies Not Applicable Complies 	Check for any abo of distillate tempe Check for the ope	normal trend erature	 Complies Not Complies Not Applicable Complies 	
Check for any critical alarm	 Not Complies Not Applicable 	defined set param	-	Not CompliesNot Applicable	
Check for any Maintainace work done	 □ Complies □ Not Complies □ Not Applicable 	Check for leakage	-	 Complies Not Complies Not Applicable 	
Check for the results of online TOC	 Complies Not Complies Not Applicable 	Check for calibrat temperature, conc pressure sensors		 □ Complies □ Not Complies □ Not Applicable 	
Interview of operator for potential cause (Report attached if required)	□ Yes □ No				
Investigation Evaluation	Investigation Evaluation Summary:				
Findings of investigation and final conclusion Investigation details (provide details in chronology order. Attach all supporting documents and details of isolates identified, if applicable):					
Root cause/Probable root cause:					
Impact Assessment					
Corrective action and preventive action (Mentioned CAPA taken, in brief also mention CAPA reference No. Final conclusion					
Head- QC/Micro (Sign./Date)	Head- Engineering (Sign./Date)	Head- Production (Sign./Date)	L	Head- QA (Sign./Date)	



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ANNEXURE X INVESTIGATION OF MICROBIAL EXCURSION IN ENVIRONMENT (PHASE-II INVESTIGATION)

Notification No.		Name of Production Facility/Area	
Date of Sampling		Sampling Location	
Type of Sampling		Area Classification	
PHASE II Review & Investigation	n in Affected Area/N		
Review microbiological environment monitoring results of adjacent location of affected area	 □ Complies □ Not Complies □ Not Applicable 	Review microbiological environment monitoring trend (Last 60 Days)	 Complies Not Complies Not Applicable
Review the microbial personnel Monitoring results	 □ Complies □ Not Complies □ Not Applicable 	Review the microbial personnel monitoring trend (Last 60 days)	 Complies Not Complies Not Applicable
Review the NVPC results	 □ Complies □ Not Complies □ Not Applicable 	Review the NVPC trend (Last 60 days)	 Complies Not Complies Not Applicable
Review the temperature, RH & ΔP of area trend (Last 60 □ Complies □ Not Complies □ Not Applicable days)		Review the ∆P of UAF/HEPA trend (Last 60 days)	 Complies Not Complies Not Applicable
Review the no. of persons worked in the aseptic processing area Date & No.	 □ Complies □ Not Complies □ Not Applicable 	Review the qualification status of personnel entered in aseptic area	 Complies Not Complies Not Applicable
Review the nature of activity performed in the room.	 □ Complies □ Not Complies □ Not Applicable 	Review the maintenance activity performed in area if any	 Complies Not Complies Not Applicable
Check the personnel health/hygiene	 □ Complies □ Not Complies □ Not Applicable 	Review the usage of sterilized garments within the hold time.	 Complies Not Complies Not Applicable
Verify the condition of sterilized garments	□ Complies □ Not Complies □ Not Applicable	To review load pattern of sterilization cycles.	□ Complies □ Not Complies □ Not Applicable
Name and concentration of sanitizing agent used		Preparation and expiry dates of disinfectants used.	
Cleaning and sanitization performed by		Review of training records of the personnel.	 Complies Not Complies Not Applicable
Items passing to the aseptic processing area done as per SOP.	 □ Complies □ Not Complies □ Not Applicable 	Power failure if any	□ Yes □ No
Abnormal observation if any	\Box Yes	HVAC Validation done on	



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	🗆 No		
HVAC Validation due on		Deviation if any results of HVAC Validation	 Complies Not Complies Not Applicable
Check entry/Exit records for critical area	 Complies Not Complies Not Applicable 	Personnel's entered the area on the day count exceeds alert/action limit, whether the entry/Exit procedure was followed as per SOP.	 □ Complies □ Not Complies □ Not Applicable
Review the gowning qualification of the personnel's entered the critical area.	 Complies Not Complies Not Applicable 	Check cleaning and sanitization record and usage of qualification disinfectants and their preparation as applicable.	 □ Complies □ Not Complies □ Not Applicable
Check the personnel qualification record to enter in critical area	 □ Complies □ Not Complies □ Not Applicable 	Check RH Temperature and Differential pressure	 Complies Not Complies Not Applicable
Evaluate BMR and check the duration of the filling	 □ Complies □ Not Complies □ Not Applicable 	Check AHU Operation log	 Complies Not Complies Not Applicable
Check sterilization details for equipment/garments/accessories used on that particular day	 Complies Not Complies Not Applicable 	Check water system regeneration/sanitization record i.e. when it was done for the last	 □ Complies □ Not Complies □ Not Applicable
Verify the sanitization and disinfection record	 □ Complies □ Not Complies □ Not Applicable 	Check the personnel hygiene of the persons involved	 □ Complies □ Not Complies □ Not Applicable
HVAC breakdowns occurred during the exposure.	 Complies Not Complies Not Applicable 	Evaluate filter integrity records of all filters including autoclave vent filter integrity record	 □ Complies □ Not Complies □ Not Applicable
Check the validation of AHU, Autoclave, Tunnel, Filter and Sanitizer efficacy	 Complies Not Complies Not Applicable 		
Interview operators (s) for potential cause: Investigation Evaluation			
Summary: Probable Cause for Excursion (based on isolate)			
Impact assessment			



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Corrective action and preventive action (Mentioned CAPA taken, in brief also mention CAPA reference No.			
Final Conclusion:			
Head-QC/Micro (Sign./Date)	Head-Engineering (Sign./Date)	Head-Production (Sign./Date)	Head-QA (Sign./Date)



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ANNEXURE XI EXTENSION FORM FOR INVESTIGATION OF MICROBIAL EXCURSION IN WATER/ ENVIRONMENT

Notification No.	Date of Intimation	
Due Date	New Completion Date	
Reason for Extension:		
Extension Taken By:	Head- QA:	
(Sign./Date)	(Sign./Date)	



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PHARMA DEVILS

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ANNEXURE-XII TRENDING OF EXCURSION DATA

Mont	:h:		Year:								
Excu	Excursion Distribution										
S.No.	Month	Total No. of	Month	Instrument	Microbiologist	Product/item	Others				
		Excursion			_						
Total			Total								

Interview of if required)	person for potential cause (attach report	CompliesNot Applicable	□ Not Complies
n requireu)	 Instrument Analyst Product/item A <	• Others	
Review and	Comments:	J	

Operating Manager QA (Sign &Date) Head QA (Sign &Date)

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