rather consistent rate. However, the relationship between microbial (viable) and nonviable contamination does not hold for particulates shed by processing equipment. Where equipment is the primary source of particulate matter, the resulting particulates are essentially all nonviable.

The argument that if fewer total particulates are present in a clean room, it is less likely that airborne microorganisms will be present is true only if human operators are the source of particulate matter. It is not possible to clearly distinguish between background total particulate contamination generated largely by mechanical operations and the total particulates contributed by personnel. Thus, it is both commonplace and proper for clean-room environmental monitoring programs to consist of both a total particulate component and a microbiological component. <u>Table 1</u> describes the clean room classifications commonly used in the pharmaceutical industry. In aseptic processing, clean environments of ISO 14644-1 Classes 5–8 are typically used.

Table 1. Airborne Total Particulate Cleanliness Classes<sup>a</sup>

ISO Class <sup>b</sup>	Particles ≥ 0.5 μm/m <sup>3</sup>		
ISO 5	3520		
ISO 6	35,200		
ISO 7	352,000		
ISO 8	3,520,000		

<sup>&</sup>lt;sup>a</sup> Taken from ISO International Standard 14644 Part 1, published by the International Organization for Standardization, May 1999.

ISO 5/Class 100, ISO 6/Class 1000, ISO 7/Class 10,000, and ISO 8/Class 100,000.

Isolators and closed RABS present a different picture, because personnel are excluded from the aseptic processing environment and manipulations are made using glove-and-sleeve assemblies and half-suits made of thick, flexible plastic (such as polyvinyl chloride or synthetic rubber). Personnel have far less effect on the microbial quality of the environment within an isolator enclosure than in clean room environments. Some users have chosen to operate RABS in a manner that allows open, direct human intervention. In an open operational state, these systems are more similar in operation to conventional clean rooms and therefore cannot be considered advanced aseptic processing systems. In an open RABS, the ability of operators to adversely affect microbial contamination risk is higher than with closed RABS or isolators.

Specifications for air changes per hour and air velocities are not included in ISO 14644, nor were they included in Federal Standard 209E. Typically, ISO Class 8/Class 100,000 rooms

b The four ISO 14644-1 classes correspond closely to former U.S. Federal Standard 209E classifications. The relationships are

are designed to provide a minimum of 20 air changes per hour; ISO Class 7/Class 10,000 rooms are designed to provide more than 50 air changes per hour; and ISO Class 5/Class 100 clean rooms provide more than 100 air changes per hour. The design of some facility criteria may differ. By diluting and removing contaminants, large volumes of air are likely to reduce airborne contamination in aseptic production. Optimum conditions vary considerably, depending on process characteristics, particularly the amount of contamination derived from personnel. These specifications should be used only as a guide in the design and operation of clean rooms, because the precise correlations among air changes per hour, air velocity, and microbial control have not been satisfactorily established experimentally.

Manufacturers should maintain a predominantly unidirectional flow of air (either vertical or horizontal) in a staffed Class 5 clean room environment, particularly when products, product containers, and closures are exposed. In the evaluation of air movement within a clean room, studying airflow visually by smoke studies or other suitable means is probably more useful than using absolute measures of airflow velocity and change rates. Risk assessment models are another useful way of reducing contamination risk and should be considered.

Air velocity and change rates are far less important in isolators or closed RABS than in clean rooms because personnel are more carefully separated from the product, product containers, and closures. Air velocities substantially lower than those used in human-scale clean rooms have proved adequate in isolator systems and may be appropriate in RABS as well. In zones within isolators where particulate matter poses a hazard to product quality, predominantly vertical or horizontal unidirectional airflow can be maintained. Experience has shown that well-controlled mixing or turbulent airflow is satisfactory for many aseptic processes and for sterility testing within isolators (see <u>Sterility Testing—Validation of Isolator Systems</u> ( 1208 )).

## IMPORTANCE OF A MICROBIOLOGICAL EVALUATION PROGRAM FOR CONTROLLED ENVIRONMENTS

Monitoring of total particulate count in controlled environments, even with the use of electronic instrumentation on a continuous basis, does not provide information on the microbiological content of the environment. The basic limitation of particulate counters is that they measure particles of 0.5 µm or larger. While airborne microorganisms are not free-floating or single cells, they frequently associate with particles of 10–20 µm. Particulate counts as well as microbial counts within controlled environments vary with the sampling location and the activities being conducted during sampling. Monitoring the environment for nonviable particulates and microorganisms is an important control function because they both are important in achieving product compendial requirements for *Foreign and* 

because the conditions during one sampling occasion may not be accurately duplicated during another.

Surface samples may also be taken from clean room garments. Personnel sampling should be emphasized during validation and is best done at the completion of production work in order to avoid adventitious contamination of the garments. In this case the average should be <1% for these sample sites as well. Gloves on closed RABS and isolators should meet the more rigorous expectation of <0.1% contamination recovery rates.

Because of the inherent variability of microbial sampling methods, contamination recovery rates are a more useful measure of trending results than is focusing on the number of colonies recovered from a given sample. <u>Table 3</u> provides recommended contamination recovery rates for aseptic processing environments. The incident rate is the rate at which environmental samples are found to contain microbial contamination. For example, an incident rate of 1% would mean that only 1% of the samples taken have any contamination regardless of colony number. In other words, 99% of the samples taken are completely free of contamination. Contamination recovery rates that are higher than those recommended in <u>Table 3</u> may be acceptable in rooms of similar classification that are used for lower-risk activities. Action should be required when the contamination recovery rate trends above these recommendations for a significant time.

Table 3. Suggested Initial Contamination Recovery Rates in Aseptic Environments<sup>a</sup>

Room Classification	Sample	Settle Plate (9 cm) 4 h Exposure (%)	Contact Plate or Swab (%)	Glove or Garment (%)
Isolator/Closed RABS (ISO 5 or better)	<0.1	<0.1	<0.1	<0.1
ISO 5	<1	<1	<1	<1
ISO 6	<3	<3	<3	<3
ISO 7	<5	<5	<5	<5
ISO 8	<10	<10	<10	<10

All operators are aseptically gowned in these environments (with the exception of background environments for isolators). These recommendations do not apply to production areas for nonsterile products or other classified environments in which fully aseptic gowns are not donned.

Detection frequency should be based on actual monitoring data and should be retabulated monthly. Action levels should be based on empirical process capability. If detection frequencies exceed the recommendations in <u>Table 3</u> or are greater than established process capability, then corrective actions should be taken. Corrective actions may include but are not limited to the following:

- Revision of the sanitization program, including selection of antimicrobial agents, application methods, and frequencies
- Increased surveillance of personnel practices, possibly including written critiques of aseptic methods and techniques
- Review of microbiological sampling methods and techniques

When higher-than-typical recovery levels for glove and garment contamination are observed, additional training for gowning practices may be indicated.

## SIGNIFICANT EXCURSIONS

Excursions beyond approximately 15 cfu recovered from a single ISO 5 sample, whether from airborne, surface, or personnel sources, should happen very infrequently. When such ISO 5 excursions do occur, they may be indicative of a significant loss of control when they occur within the ISO 5 critical zone in close proximity to product and components. Thus, any ISO 5 excursion >15 cfu should prompt a careful and thorough investigation.

A key consideration for an abnormally high number of recovered colonies is whether this incident is isolated or can be correlated with other recoveries. Microbiologists should review recovery rates for at least two weeks before the incident of abnormally high recovery so that they can be aware of other recoveries that might indicate an unusual pattern.

Microbiologists should carefully consider all recoveries, including those that are in the more typical range of 1–5 cfu. The identity of the organisms recovered is an important factor in the conduct of this investigation.

In the case of an isolated single excursion, establishing a definitive cause probably will not be possible, and only general corrective measures can be considered. It is never wise to suggest a root cause for which there is no solid scientific evidence. Also, there should be an awareness of the variability of microbial analysis. Realistically, there is no scientific reason to treat a recovery of 25 cfu as statistically different from a recovery of 15 cfu. A value of 15 cfu should not be considered significant in terms of process control, because realistically there is no difference between a recovery of 14 cfu and one of 15 cfu. Microbiologists should use practical scientific judgment in their approach to excursions.

## FURTHER CONSIDERATIONS ABOUT DATA INTERPRETATION

In the high-quality environments required for aseptic processing, detection frequency typically is low. As can be seen from the rates recommended in <u>Table 3</u>, the majority of samples taken in an aseptic processing area will yield a recovery of zero contamination. In the most critical areas within an aseptic processing operation, it is expected that less than 1% of the

samples will yield any recoverable contamination. In the most advanced of modern aseptic operations that use separative technologies such as isolators or closed RABS, the recovery rate will approach zero at all times.

The microbiologist responsible for environmental control or sterility assurance should not take this to mean that the environmental quality approaches sterility. The sensitivity of any microbial sampling system in absolute terms is not known. In environmental monitoring, a result of zero means only that the result is below the limit of detection of the analytical system. A false sense of security should not be derived from the infrequency of contamination recovery in aseptic processing.

Sterility assurance is best accomplished by a focus on human-borne contamination and the facility design features that best mitigate risk from this contamination. Greatest risk mitigation can be attained by reducing or eliminating human interventions through proper equipment design and by providing sufficient air exchanges per hour for the intended personnel population of the facility. Other risk mitigation factors include effective personnel and material movement and the proper control of temperature and humidity. Secondary factors for risk mitigation include cleaning and sanitization. Risk analysis models that analyze processes prospectively to reduce human-borne contamination risk by minimizing operator interventions are more powerful tools for sterility assurance than monitoring. Environmental monitoring cannot prove or disprove in absolute terms the sterility of a lot of product. Environmental monitoring can only assure those responsible for a process that a production system is in a consistent, validated state of control. Care should be taken to avoid drawing inappropriate conclusions from monitoring results.

## SAMPLING AIRBORNE MICROORGANISMS

Among the most commonly used tools for monitoring aseptic environments are impaction and centrifugal samplers. A number of commercially available samplers are listed for informational purposes. The selection, appropriateness, and adequacy of using any particular sampler are the responsibility of the user.

**Slit-to-Agar Air Sampler** (STA): The unit is powered by an attached source of controllable vacuum. The air intake is obtained through a standardized slit below which is placed a slowly revolving Petri dish that contains a nutrient agar. Airborne particles that have sufficient mass impact the agar surface, and viable organisms are allowed to grow. A remote air intake is often used to minimize disturbance of unidirectional airflow.

**Sieve Impactor:** This apparatus consists of a container designed to accommodate a Petri dish that contains a nutrient agar. The cover of the unit is perforated with openings of a