

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:
83-564

CORRESPONDENCE

Orig

Delco

RESUBMISSION

CHEMICAL COMPANY, INDA ORIG AMENDMENT

7 MacQUESTEN PARKWAY NORTH, MOUNT VERNON, NEW YORK 10550 914-664-8348

October 20, 1975

Marvin Seife, M.D., Director
Division of Generic Drug Monographs
Office of Drug Monographs
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland, 28052

Re: Amendment to N.D.A. 83-564
Delcobese Capsules, 5 mg.,
10 mg., 15 mg., 20 mg.

Dear Dr. Seife:

Reference is made to your letter of October 17, 1975, referring to our amendment to our abbreviated new drug application #83-564, dated April 14, 1975, for Delcobese Capsules, 5 mg., 10 mg., 15 mg. and 20 mg.

We are herewith submitting the following updated and revised information as it relates to the adequate assurance of the identity, strength, quality and purity of components and final dosage forms as requested in your above dated letter.

I. Active ingredients.

- A. Page 39 of the submission - added the upper limit to the purity of the active ingredient Dextroamphetamine Sulfate not to exceed (See revised page 39 enclosed.)
- B. Pages 40 and 41 of the submission - the monograph for the active ingredient d, l Amphetamine Adipate is revised to include:

- (1) consolidation of pages 40 & 41 (i.e. specific rotation listed with other tests).
- (2) molecular weight to read 281.34.
- (3) purity limits between
- (4) the addition of the specific color change in the assay titration end point to read "
- (5) the addition of a Residue on Ignition test.



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CHEMICAL COMPANY, Inc.

7 MacQUESTEN PARKWAY NORTH, MOUNT VERNON, NEW YORK 10550 914-664-8348

Marvin Seife, M.D.

- 3 -

10/20/75

he

III. Inactive Ingredients.

- A. Empty Gelatin Capsules - We are submitting a specification monograph for empty Gelatin Capsules which contain statements as to its weight, identification, composition, solubility, and which also includes a statement from the capsule supplier, _____ certifying as to the capsule composition and specifications. (See Gelatin Capsules monograph and Elanco Products' letter of certification enclosed.)

The applicant has noted your request for a current description of the facilities, personnel, and standard operating procedures in use by our contract manufacturer. We refer you to pages 24 through 33 of the submitted amended application whereby the contract manufacturer, namely Inwood Laboratories, Inc., has described some current operations as it relates to Delcobese products. We have notified _____, Inc. of your suggestion to immediately review their _____ and update those sections that require updating and will have them forward these revisions to you.

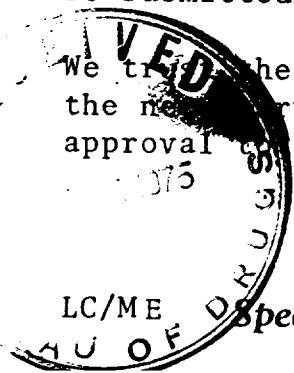
The stability program is an ongoing one and is being monitored with the proposed expiration date in mind. Any pertinent accumulated data will be submitted when available.

We trust these revisions to the specifications submitted will complete the necessary information required whereby we may be favored with an approval of the submitted application.

Sincerely yours,
DELCO CHEMICAL COMPANY, INC.

Louis Cohen Louis Cohen
President

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ORIG E

Delco

NDA ORIG AMENDMENT.

CHEMICAL COMPANY, Inc.

FPL

7 MacQUESTEN PARKWAY NORTH, MOUNT VERNON, NEW YORK 10550 914-664-8348

April 14, 1975

Marvin Seife, M. D., Director
Generic Drug Staff
Office of Scientific Evaluation
Bureau of Drugs
Food & Drug Administration
5600 Fishers Lane
Rockville, Maryland 20852

Amendment to NDA 83-564
Delcobese Capsules, 5 mg., 10 mg.,
15 mg., & 20 mg.

Dear Dr. Seife:

Reference is made to our letter of February 7, 1975 advising you that of January 3, 1975 incorporated, St., 11696 will be the new manufacturer for the above listed capsules and that an amended application will be forthcoming as soon as the necessary data became available.

We are herewith submitting this Amendment to our abbreviated new drug application #83-564 as set forth in paragraph 314.6 of Title 21 of the Code of Federal Regulations. This Amendment is submitted in compliance with the Federal Register notice of July 19, 1974, pages 26459/26462, reference "Drugs for Human Use - Drug Efficacy Study Implementation Certain Single Entity Oral Anorectic Drugs in Conventional or Controlled Release Dosage Forms".

Since this Amendment is substantive, the previous submission may be considered to be withdrawn and this amended application be considered resubmitted.

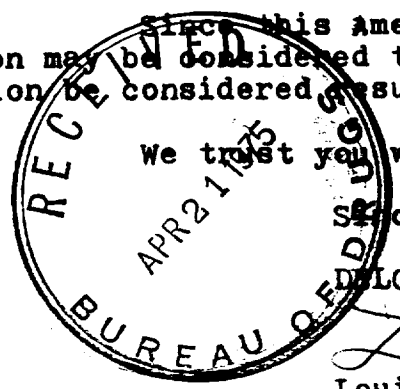
We trust you will find this Amendment in order.

Sincerely yours,

DELCO CHEMICAL COMPANY, Inc.

Louis Cohen

Louis Cohen, President



LC-em.

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CHEMICAL COMPANY, Inc.

7 MacQUESTEN PARKWAY NORTH, MOUNT VERNON, NEW YORK 10550 914-664-8348

October 24, 1975

Marvin Seife, M.D., Director
Division of Generic Drug Monographs
Office of Drug Monographs
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland, 28052

Re: Amendment to N.D.A. 83-564
Delcobese Capsules, 5 mg.,
10 mg., 15 mg., 20 mg.

Dear Dr. Seife:

Reference is made to our letter of October 20, 1975. In response to your letter of October 17, 1975, referring to our amendment to our abbreviated new drug application #83-564, dated April 14, 1975, for Delcobese capsules 5 mg., 10 mg., 15 mg. and 20 mg.

In our letter of October 20, 1975, we had revised the monograph for the finished dosage form, Delcobese capsules in which the assay described therein was a colorimetric procedure using the color reaction whereby
a 1 nt ally

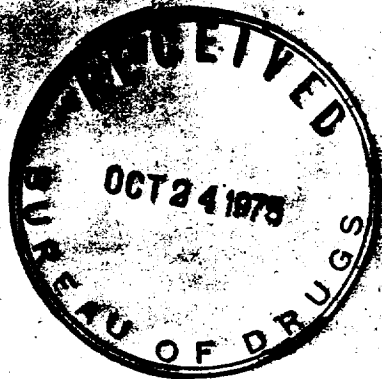
We are enclosing herewith the description of the method we used to validate this analytical procedure and trust you will find it satisfactory.

Sincerely yours,

DELCO CHEMICAL COMPANY, INC.

Louis Cohen

Louis Cohen
President



LC/MF/nc

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OCT 17 1975

AF 9-389

Dalco Chemical Company, Inc.
Attention: Louis Cohen
7 MacQuiston Parkway North
Mount Vernon, NY 10550

Gentlemen:

Reference is made to your abbreviated new drug application submitted pursuant to Section 505(b) of the Federal Food, Drug, and Cosmetic Act for Dalecbase Capsules, 5 mg., 10 mg., 20 mg.

We acknowledge your communications dated August 15, 1973, July 10, 1974 and February 7, 1975 relating to the application.

Reference is also made to your amendment dated April 14, 1975 which replaces _____ with _____ Incorporated as the contract manufacturer, processor, packager and labeler of the drug dosage forms.

The application is inadequate under sections 505(b)(3) and (4) of the Act in that it fails to contain the following information required in an application:

A quantitative statement of composition of the gelatin capsules in use.

A current description of the facilities, personnel, and standard operating procedures in use by your contract manufacturer. We suggest a review of _____ updating as necessary.

Adequate assurance of the identity, strength, quality and purity of components and final dosage forms. In this regard for:

I. Active ingredients:

- A. Dextroamphetamine sulfate: Provide for an upper purity limit as per U.S.P. standards (see page 37, insert "....and not more than _____ percent....")

- B. d,l Amphetamine adipate:
- (1) Consolidate pages 40 and 41 (i.e. include specific rotation with other tests)
 - (2) Change the molecular weight to 281.34
 - (3) Change the purity limits to ".... percent...."
 - (4) Specify the color of the endpoint in the assay (i.e. emerald green)
 - (5) Add:
 - a) identification testing for the amphetamine and adipate portions of the molecule
 - b) residue on ignition testing
- C. Dextroamphetamine adipate:
Appropriate comments as applied to d,l Amphetamine adipate

II. Final dosage forms:

- A. Include a statement of total amine content for each dosage form.
- B. Include purity specifications of not less than not more than the total established amine content.
- C. Specify the disintegration time.
- D. Add:
 - 1) identification testing for amphetamine
 - 2) content uniformity (total amines)

We note that stability data submitted with the application is for a period less than the proposed expiration date. Possibly you may have accumulated longer term data by this time.

Please let us have your response promptly.

cc:

Sincerely yours,
Maryn Seife 10/17/75
Maryn Seife, M.D.
Director
Division of Generic Drug Monographs
Office of Drug Monographs
Bureau of Drugs

10/16/75

12

25. COMPONENTS AND COMPOSITION (6, 7)

quantitative statement of composition for the gelatin capsules
formulates with : of active ingredients

26. FACILITIES AND PERSONNEL (8a,b)

provided in

27. SYNTHESIS (8c)

provided in

28. RAW MATERIAL CONTROLS (8d,e)

a. NEW DRUG SUBSTANCE

inadequate for active ingredients as per issuing letter

b. OTHER INGREDIENTS

29. OTHER FIRM(s) (8f)

product is manufactured, processed, packaged and labeled by

30. MANUFACTURING AND PROCESSING (8g,h,i,k)

provided in

31. CONTAINER (8l)

information included

32. PACKAGING AND LABELING (8l,m)

provided in

33. LABORATORY CONTROLS (In-Process and Finished Dosage Form) (8n)

inadequate for finished dosage form

34. STABILITY (8p)

additional data requested - firm provides for a 3 yr. expiration date and
makes commitment to continue testing and withdraw lots that may become
substandard.

35. CONTROL NUMBERS (8c)

provided in

36. SAMPLES AND RESULTS (9)

a. VALIDATION not required

b. MARKET PACKAGE

37. LABELING (4)

38. ESTABLISHMENT INSPECTION

39. RECALLS

Delco

ORIG NEW CORRES

ORIG

CHEMICAL COMPANY, Inc.

7 MacQUESTEN PARKWAY NORTH, MOUNT VERNON, NEW YORK 10550 914-664-8348

February 7, 1975

See FDA letter
10-17-75

Marvin Seife, M.D., Director
Generic Drug Staff
Office of Scientific Evaluation
Bureau of Drugs
Food & Drug Administration
5600 Fishers Lane
Rockville, Maryland 20852

Re: NDA 83-564
Delcobese Capsules, 5mg., 10mg., 15mg., and 20mg.

Dear Dr. Seife,

Reference is made to our abbreviated new drug application dated February 23, 1973, submitted pursuant to Section (505(b) of the Federal Food, Drug and Cosmetic Act for Delcobese Capsules, 5mg., 10mg., 15mg., and 20mg.

Please be advised that as of January 3, 1975 Incorporated, will be the new manufacturer for the above listed capsules.

We are currently collecting the necessary data required for the filing an amendment to the above numbered abbreviated new drug application and should have this necessary data available for this amendment within the next 60 days.

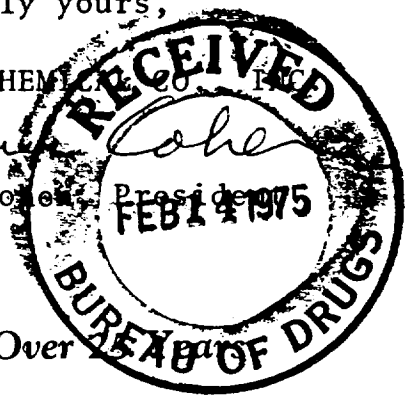
We trust you will find the above in order, we are

RECEIVED / COPY
PHOTOSTATS MADE
FOR DUP / TRIP ✓

Sincerely yours,

DELCO CHEMICAL CO. INC.

Louis Cohen
Louis Cohen, President



LC/gf
cc: MF

Specializing In Obesity Products For Over

ORIG NEW CORRES

Delco CHEMICAL COMPANY, INC. *Orig*

Specializing In Obesity Products For Over 25 Years

7 MacQUESTEN PARKWAY NORTH

MOUNT VERNON, NEW YORK 10550

MOunt Vernon 4-8348

July 10, 1974

Marvin Seife, M.D., Director
Generic Drug Staff
Office of Scientific Evaluation
Bureau of Drugs
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20852

Ref: NDA 83-564

Product: Delcobese 5mg., 10mg., 15mg., and 20 mg. capsules
"Annual Report"

Dear Doctor Seife:

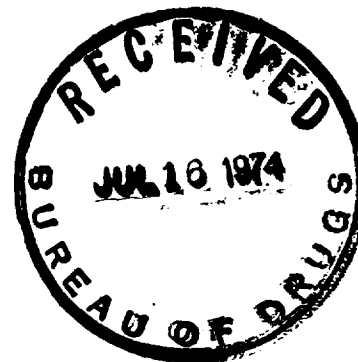
There has been no significant change in our production or analytical control for our products referred to above.

We are at this time submitting our stability data for the respective dosage forms.

Respectfully submitted,
Delco Chemical Co., Inc.

Louis Cohen

Louis Cohen, Pres.



RESUBMISSION

E

Delco CHEMICAL COMPANY, INC. NDA ORIG AMENDMENT

Orig

Specializing In Obesity Products For Over 25 Years

7 MacQUESTEN PARKWAY NORTH

MOUNT VERNON, NEW YORK 10550

MOunt Vernon 4-8348

August 15, 1973

Marvin Seife, M.D., Director
Generic Drug Staff
Office of Scientific Evaluation
Bureau of Drugs
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20852

Ref: NDA 83-564

Product: Delcobese 5mg., 10mg., 15mg., and 20mg. Capsules

Dear Doctor Seife:

Reference is made to your communication dated August 7, 1973 - we will endeavor, herewith, to submit and clarify the requirements of the application.

I. Form 356-H-Paragraph 7. - A full statement of the composition of the drug.

a) The statement included in our submission does set forth the name and amount of each ingredient, whether active or not, contained in a stated quantity of the drug in the form it is to be distributed-see page 1.20 of NDA.

b) The batch formulae representative of that to be employed for the manufacture of the finished dosage forms appear on Pages 1.55, 1.56, 1.57 and 1.58 of the NDA.

II. Paragraph 8 (Form 356-H)

A. "Pertaining to your role in the operations.:

AMPHETAMINE AND DEXTROAMPHETAMINE

1

AMPHETAMINE AND DEXTROAMPHETAMINE

III. "A more complete description of, and the data derived from studies of the stability of the drug dosage form."

Answer: We are submitting herewith stability data re the drug dosage form.

IV. "Samples of the finished capsules"

Answer: We are submitting herewith samples of the finished capsules, as per your request.

V. "Revised (1) container labels on which the statement "central stimulant short-term appetite depressant" is deleted and (2) package insert, as per the accompanying labeling guidelines and with information in the "Supplied in....." section transferred to the How Supplied section."

Answer: We are herewith submitting new labels deleting the statement "central stimulant short-term appetite depressant ."

However, as to the insert guidelines you forwarded dated "Draft 1/29/73" it is not consistent with the guidelines published in the Federal Register Vol. 38 No. 28, dated Monday, February 12, 1973 which is after the Draft which you forwarded; please clarify.

Too, the "How supplied in" relates to the description of the composition of the dosage form - and we would appreciate your review of your comments in your missive dated August 7, 1973.

VI. "It is also requested that you clarify operations performed by you in connection with this application"

Answer: Delco Chemical Co., Inc. is the sole distributor of Delcobese

CHEMIST'S REVIEW <i>(If necessary, continue any item on 8 1/2 x 10 1/2" paper.)</i>		1. ORGANIZATION bd-69	2. NDA NUMBER 83-
3. NAME AND ADDRESS OF APPLICANT (City and State) delco chemical co., inc. mt. vernon, ny 10550		4. DATE NDA APPROVED	
5. NAME OF DRUG delcobese	7. NONPROPRIETARY NAME adipate & sulfate salts of amphetamine + d-amphetamine		8. IF PRIOR TO 1962 DATE APPROVED FOR EFFICACY
9. PURPOSE OF SUPPLEMENT		9. SUPPLEMENT NUMBER DATE	
12. PHARMACOLOGICAL CATEGORY anorexic		10. AMENDMENT DATE(s) 4/6/73	
14. DOSAGE FORM capsules		15. HOW DISPENSED <input checked="" type="checkbox"/> Rx <input type="checkbox"/> OTC	
17. POTENCY (mg) 5,10,15,20 mg.		18. NAS/NRC <input type="checkbox"/> UNDER REVIEW <input checked="" type="checkbox"/> REVIEWED	
19. CHEMICAL NAME		20. RECORDS AND REPORTS CURRENT <input type="checkbox"/> YES <input type="checkbox"/> NO REVIEWED <input type="checkbox"/> YES <input type="checkbox"/> NO	
21. CHEMICAL FORMULA			
22. REMARKS NOTE: 1. bioavailability deferred, as per bio committee 1/8/73 2. designation to be INADEQUATE 3. response to be requested within 120 days			
23. CONCLUSIONS inadequate letter to issue			
24. REVIEWER			
NAME gmillar	SIGNATURE <i>gmillar</i> 1/8/73		DATE COMPLETED 3
DISTRIBUTION <input checked="" type="checkbox"/> ORIGINAL JACKET <input type="checkbox"/> DUPLICATE JACKET <input type="checkbox"/> REVIEWER			

25. COMPONENTS AND COMPOSITION (6, 7)
 talc used = from _____ in #2 capsules (specs needed)
 all weight 5.5 gr.
 satisfactory
 note: glc assay for determination of total amphetamine

26. FACILITIES AND PERSONNEL (8a, b)
 synthesizer of 4 active ingredients & (c) _____ as mfo of capsules
 needed for (a) delco. as sponsor (b) _____ as

27. SYNTHESIS (8c)
 as per _____ chemical corp: note batch formulae given for suitab.
 ; need same for (1) _____

28. RAW MATERIAL CONTROLS (8d, e)
 a. NEW DRUG SUBSTANCE
 _____ amphetamine acetate = del
 (need reference for it)
 b. OTHER INGREDIENTS
 satisfactory

29. OTHER FIRM(S) (8f)
 appropriate _____ as per #27 _____ & 1 _____ labs performe
 certifications need _____, as per #30 _____ animal studies

30. MANUFACTURING AND PROCESSING (8g, h, i, k)
 need special precautions + info as to quat as per FR of
 5/8/73; otherwise = satisfactory
 Note: CII drug for _____ batches

31. CONTAINER (8j)
 in bottles of 1000 + 5000
 need full information

32. PACKAGING AND LABELING (8l, m)
 need full information

33. LABORATORY CONTROLS (In-Process and Finished Dosage Form) (8n)
 need additional specs : _____ ts = (1) wt variation (2)
 (a) glc (b) non-aqueous titration for total amines.

34. STABILITY (8p)
 needed

35. CONTROL NUMBERS (8q)
 needed

36. SAMPLES AND RESULTS (8r)
 a. VALIDATION _____ ethod _____
 b. MARKET PACKAGE _____

37. LABELING (8s)
 revised, as per 110(j) (ellert)

38. ESTABLISHMENT INSPECTION
 requested 8/1/73 for

39. REGALLS
 na

MEMO RECORD	AVOID ERRORS PUT IT IN WRITING	DATE 2/1/73
FROM: gerry millar (thru Jack L. Meyer)		OFFICE BD-69
TO: Mr. C.G. Broker (thru Stan Stringer BD-105)		DIVISION BD-340
SUBJECT: Collaborative draft (a)		

SUMMARY

In connection with NDAs 83-563
83-564

for delcobese (4 amphetamine combo)
tablets + capsules
5, 10, 15 & 20 mg.

The applicant: delco chemical co., inc
mt. vernon, ny 10550

AF: 9-389

We acknowledge receipt on 2/5/73

of abbr nda

dated 2/23/73

for the preparations

In accordance with the 2/27/73 directive, Office of Compliance
a request is made for:

REQUESTED

xxx 1. establishment inspection report on

xx a. the applicant

xxxx b. others

firm that might at
these preparations

582

2. evaluation of compliance with CGMPR

3. recommendation for approval/disapproval of the
application/communication/supplement

based on your evaluation of compliance with CGMPR

NOTE: have inspectors check rexar's quota, as per FR of 2/1/73

PLEASE EXPEDITE

SIGNATURE

DOCUMENT NUMBER

5mg

10 mg

15 mg

20 mg

amphetamines

as per label contents

corn starch

lactose

talc

Original

E

NDA ORIG AMENDMENT

Delco CHEMICAL COMPANY, INC. FPL

Specializing In Obesity Products For Over 25 Years

7 MacQUESTEN PARKWAY NORTH

• MOUNT VERNON, NEW YORK 10550 •

• MOUNT VERNON 4-8348

PERSONALLY SUBMITTED BY

*Joseph Barrows
Rec'd by B. Swencko
4-12-73*

April 6, 1973.

Marvin Seife, M.D., Director
Division of Actions Implementation
Drug Efficacy Study Implementation
Project Office
Bureau of Drugs, Food and Drug Administration
5600 Fishers Lane,
Rockville, Maryland 20852

Ref: NDA 83-564

Products: DELCOBESE CAPSULES, 5mg., 10 mg., 15 mg., and 20 mg.

Dear Doctor Seife:

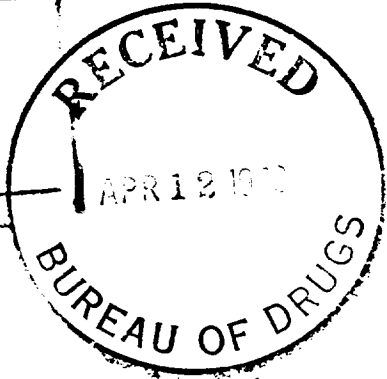
Pursuant to Section 305(b) of the Federal Food, Drug and Cosmetic Act; and in accordance to s.s. 130.7 we are amending our New Drug Application as follows:

Under Paragraph 4 (Copies of labels) Form 356-H

We have revised the package insert; and now are submitting the new copy pertaining thereto.

Enclosed are 12 copies of the new package insert.

RECEIVED / COPY
PHOTOCOPIES MADE
OR DUP TRIP



Respectfully submitted,
DELCO CHEMICAL CO., INC.

Louis Cohen
Louis Cohen, President

LC:g

NDA 83-564
AF 9-389

MAR 30 1973

Delco Chemical Co., Inc.
Attention: Mr. Louis Cohen
7 N. Macquesten Parkway
Mt. Vernon, New York 10550

Gentlemen:

Reference is made to your abbreviated new drug application dated February 23, 1973, submitted pursuant to Section 505(b) of the Federal Food, Drug, and Cosmetic Act for Dalcobese Capsules, 5 mg., 10 mg., 15 mg., and 20 mg.

Since no provision has been made for this preparation as a sustained release capsule to be filed as an abbreviated new drug application in any Federal Register notice, the application as submitted will not be reviewed at this time.

However, the material submitted is being retained on our file.

Sincerely yours,

Marvin Seife 3/30/73

Marvin Seife, M.D.
Director
Division of Antitoxin Implementation
Drug Efficacy Study Implementation
Project Office
Bureau of Drugs

cc:
NYK-DO

3/29/73

ACK.

NDA 83-564/S-009

DEC 18 1975

Delco Chemical Company, Inc.
Attention: Louis Cohen
3 Macomber Parkway North
Mount Vernon, NY 10550

Gentlemen:


We acknowledge receipt on November 20, 1975, of a communication of November 14, 1975, submitted on your behalf by your manufacturing facility, is regarded as a supplemental new drug application submitted pursuant to Section 351(b) of the Federal Food, Drug, and Cosmetic Act for Salicylic Acid ^{Capsules} 5 mg., 10 mg., 15 mg., and 20 mg.

The supplemental application provides for control revisions at the facility.

We have completed the review of this supplemental application and it is approved. Our letter of October 24, 1975, detailed the conditions relating to the approval of this application.

The material submitted is being retained in the file.

Sincerely yours,

 (2/18/75)
Marvin Sirov, M.D.
Director
Division of Generic Drug Monographs
Office of Drug Monographs
Bureau of Drugs

ANDA

- 83-564 Amphetamine Sulfate Capsules USP, 5 mg, 10 mg and 20 mg
- 83-563 Amphetamine Sulfate Tablets USP, 5 mg, 10 mg and 20 mg

Lemmon Company
 Attention: Stanley Scheindlin, D.Sc.
 650 Cathill Road
 Sellersville, PA 18960

MAR 23 1993

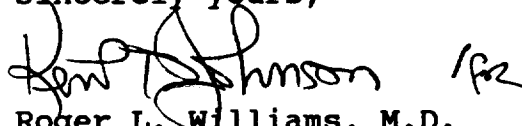
Dear Sir:

We acknowledge the receipt of your communications dated February 24, 1993, requesting withdrawal of approval of your abbreviated new drug applications for the above referenced products.

In compliance with your request and in accordance with Section 314.150(c) of the Regulations under the Federal Food, Drug and Cosmetic Act, action will be taken to withdraw approval of the applications. Appropriate notice will be given by publication in the Federal Register in accordance with Section 314.152.

These withdrawals will not prejudice any future filing of the applications. You may request that the information in these applications be considered in connection with any resubmission.

Sincerely yours,



Roger L. Williams, M.D.
 Director
 Office of Generic Drugs
 Center for Drug Evaluation and Research

3-21-93

cc:

LEMMON

LEMMON COMPANY
650 Cathill Road
Sellersville, PA 18960
Phone: (215) 256-8400
Fax: (215) 721-9669

Stanley Scheindlin, D.&C.
Director, Regulatory Affairs

31

WITHDRAWN
NECESSARY

February 24, 1993

Roger L. Williams, M.D.
Office of Generic Drugs
Food and Drug Administration
Document Control Room
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

MD
OVER

ANDA 83-564
AMPHETAMINE SULFATE CAPSULES (DELCOBESE), 5, 10, 15 and 20 mg

Dear Dr. Williams:

Manufacture and commercial distribution of this product have been discontinued for several years, and future production is not anticipated. We hereby request to withdraw the above-referenced Abbreviated New Drug Application without prejudice to any future filing.

Yours very truly,

Stanley Scheindlin

SS/cs

ORIGINAL