

April 7, 2022
Dukal Corporation
Megan Quevedo
Quality and Regulatory Affairs Engineer
2 Fleetwood Court
Ronkonkoma, New York 11779

Re: K203237

Trade/Device Name: Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3

Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4

Splicing Surgical Gown

Regulation Number: 21 CFR 878.4040 Regulation Name: Surgical apparel

Regulatory Class: Class II Product Code: FYA

#### Dear Megan Quevedo:

The Food and Drug Administration (FDA) is sending this letter to notify you of an administrative change related to your previous substantial equivalence (SE) determination letter dated March 18, 2022. Specifically, FDA is updating this SE Letter for a correction to the 510(k) Summary as an administrative correction.

Please note that the 510(k) submission was not re-reviewed. For questions regarding this letter please contact Bifeng Qian, M.D., Ph.D., Office of Surgical and Infection Control Devices, at via phone: (301) 796-2261 or email: bifeng.qian@fda.hhs.gov.

Sincerely,

# Bifeng Qian -S

Bifeng Qian, M.D., Ph.D.
Acting Assistant Director
DHT4B: Division of Infection Control
and Plastic Surgery Devices
OHT4: Office of Surgical
and Infection Control Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health



March 18, 2022

Dukal Corporation Megan Quevedo Quality and Regulatory Affairs Engineer 2 Fleetwood Court Ronkonkoma, New York 11779

Re: K203237

Trade/Device Name: Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3

Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4

Splicing Surgical Gown

Regulation Number: 21 CFR 878.4040 Regulation Name: Surgical apparel

Regulatory Class: Class II Product Code: FYA Dated: March 10, 2022 Received: March 16, 2022

#### Dear Megan Quevedo:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</a>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

# Clarence W. Murray III -S

Clarence W. Murray III, Ph.D.
Assistant Director
DHT4B: Division of Infection Control
and Plastic Surgery Devices
OHT4: Office of Surgical
and Infection Control Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

## DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

#### Indications for Use

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

510(k) Number *(if known)* K203237

**Device Name** 

Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown

#### Indications for Use (Describe)

The Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown are intended to be worn by operating room personnel during surgical procedures to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material. Per ANSI/AAMI PB70:2012 Liquid barrier performance and classification of protective apparel and drapes intended for use in health care facilities, Dukal AAMI Level 3 Reinforced Surgical Gown and Sterile AAMI Level 3 Surgical Gown met the requirements for Level 3 classification; Dukal Sterile AAMI Level 4 Surgical Gown and Sterile AAMI Level 4 Splicing Surgical Gown met the requirements for Level 4 classification.

The Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown are single use, disposable medical devices, and are provided sterile.

Type of Use (Select one or both, as applicable)	
Prescription Use (Part 21 CFR 801 Subpart D)	Over-The-Counter Use (21 CFR 801 Subpart C)

#### CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

#### \*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\*

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRAStaff@fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

#### 510(k) SUMMARY K203237

# 510(k) Premarket Notification for Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown

1. **Submitter**: Dukal, LLC

2 Fleetwood Court Ronkonkoma NY 11779 Phone: 631-656-3800 Fax: 631-656-3810

2. FDA Registration Number: 2435946

3. Regulatory Affairs Contact: Megan Quevedo

Quality and Regulatory Affairs Supervisor

2 Fleetwood Court Ronkonkoma NY 11779

Telephone Number: 631-656-3800 ext. 133

Fax Number: 631-656-3810

4. **Date Summary Prepared**: April 7, 2022

5. Name of Device: Dukal Sterile AAMI Level 3 Reinforced

Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, Sterile AAMI Level 4

**Splicing Surgical Gown** 

6. Trade Name: Dukal Sterile AAMI Level 3 Reinforced

Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, Sterile AAMI Level 4

**Splicing Surgical Gown** 

7. **Common/Classification Name**: Surgical Gowns

8. **Regulation Number**: 21 CFR §878.4040

9. **Device Class**: Class II

10. **Regulation Name**: Surgical Apparel

11. Product Code: FYA

12. **Predicate Device**: Xuchang Zhengde Environstar Medical Products Co., Ltd

SMS Standard Surgical Gown (level 3), SMS Surgical Gown with Reinforcement (level 3), BVB Surgical Gown (level 4), BVB Splicing Surgical Gown (level 4).

510k #K192290, cleared on 4/30/2020.

#### 13. **Device Description**:

Surgical Gowns are intended to be worn by operating room personnel during surgical procedures to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material. The Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown are single use, disposable medical devices, and are provided sterile. Each type of Surgical Gown is available in six product sizes: M, L, XL, XXL, XXXL and XXXL-XL.

Dukal Sterile AAMI Level 3 Reinforced Surgical Gown and Sterile AAMI Level 3 Surgical Gown are made with SMS nonwoven material. The Dukal Sterile AAMI Level 4 Surgical Gown and Sterile AAMI Level 4 Splicing Surgical Gown are made with BVB material.

Only the Dukal Sterile AAMI Level 3 Reinforced Surgical Gown is reinforced with laminated material. Dukal Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, Sterile AAMI Level 4 Splicing Surgical Gown are non-reinforced.

Only the Sterile AAMI Level 4 Splicing Surgical gown has a different material for the back of the gown (SMS nonwoven fabric). The back of the gown for the Sterile AAMI Level 4 Surgical gown is made with BVB material.

All gowns are blue, with hook and loop closures, belt ties, and knitted cuff sleeves.

#### 14. Packaging:

#### Packaging for Level 3 Gowns:

Sizes M and L: 1 gown/pouch, 28 pouches/case Sizes XL: 1 gown/pouch, 26 pouches/case Sizes XXL, XXXL and XXXL-XL: 1 gown/pouch, 24pouches/case

#### **Packaging for Level 4 Gowns:**

Sizes M: 1 gown/pouch, 28 pouches/case Sizes L and XL: 1 gown/pouch, 26 pouches/case Sizes XXL, XXXL and XXXL-XL: 1 gown/pouch, 24pouches/case

#### 15. Indications for Use:

The Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown are intended to be worn by operating room personnel during surgical procedures to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material. Per ANSI/AAMI PB70:2012 Liquid barrier performance and classification of protective apparel and drapes intended for use in health care facilities, Dukal AAMI Level 3 Reinforced Surgical Gown and Sterile AAMI Level 3 Surgical Gown met the requirements for Level 3 classification; Dukal Sterile AAMI Level 4 Surgical Gown and Sterile AAMI Level 4 Splicing Surgical Gown met the requirements for Level 4 classification. The Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, and Sterile AAMI Level 4 Splicing Surgical Gown are single use, disposable medical devices, and are provided sterile.

#### 16. Comparison of Technological Characteristics with the Predicate Device:

#### **AAMI Level 3 Surgical Gowns:**

Element of Comparison	Predicate Device Xuchang Zhengde Environstar Medical Products Co., Ltd SMS Standard Surgical Gown (Level 3) & SMS Surgical Gown with Reinforcement (Level 3) (K192290)	Subject Device Dukal Sterile AAMI Level 3 Reinforced Surgical Gown & Sterile AAMI Level 3 Surgical Gown	Comparison
Indications for Use	Surgical gown is intended to be worn by operating room personnel during surgical procedure to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material.	Surgical gown is intended to be worn by operating room personnel during surgical procedures to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material.	Same

Style	Non-reinforced/Reinforced	Non-reinforced/ Reinforced	Same	
Weight per square (g/m²)	50 g/m <sup>2</sup> for SMS Standard Surgical Gown (Level 3), 45 g/m <sup>2</sup> for SMS Surgical Gown with Reinforcement (Level 3)	50 g/m <sup>2</sup> for Sterile AAMI Level 3 Surgical Gown, 45 g/m <sup>2</sup> for Sterile AAMI Level 3 Reinforced Surgical Gown	Same	
Material Composition	SMS nonwoven, Laminated material (only for SMS Surgical Gown with Reinforcement (Level 3)), white knitted cuff, white spunbond	SMS nonwoven, Laminated material (only for Sterile AAMI Level 3 Reinforced Surgical Gown), white knitted cuff, white spunbond	Same	
Regulation, Classification, Product Code	Regulation Number: 21 CFR §878.4040 Device Class: Class II Regulation Name: Surgical Apparel Product Code: FYA	Regulation Number: 21 CFR §878.4040 Device Class: Class II Regulation Name: Surgical Apparel Product Code: FYA	Same	
Product Color	Blue	Blue	Same	
Product Sizes	M, L, XL, XXL, XXXL and XXXL-XL	M, L, XL, XXL, XXXL and XXXL-XL	Same	
Sterility	Sterile (EO)	Sterile (EO)	Similar	
Level	Level 3 per AAMI PB70	Level 3 per AAMI PB70	Same	
Use	Single Use; Disposable	Single Use; Disposable	Same	
Biocompatibility	Under the conditions of each study, the Xuchang Zhengde Environstar Medical Products Co., Ltd SMS Standard Surgical Gown (Level 3) & SMS Surgical Gown with Reinforcement (Level 3) are non-cytotoxic (ISO 10993-5), are non-irritating (ISO 10993-10), and are non-sensitizing (ISO 10993-10).	Under the conditions of each study, the Dukal Sterile AAMI Level 3 Reinforced Surgical Gown & Sterile AAMI Level 3 Surgical Gown are noncytotoxic (ISO 10993-5), are non-irritating (ISO 10993-10), and are nonsensitizing (ISO 10993-10).	Same	

### **AAMI Level 4 Surgical Gown:**

Element of	Predicate Device Xuchang	Subject Device Dukal	Comparison
Comparison	Zhengde Environstar Medical Products Co., Ltd BVB Surgical Gown (Level 4) & BVB Splicing Surgical Gown (Level 4) (K192290)	Sterile AAMI Level 4 Surgical Gown & Sterile AAMI Level 4 Splicing Surgical Gown	

Indications for Use	Surgical gown is intended to be worn by operating room personnel during surgical procedure to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material.	The Dukal surgical gowns are intended to be worn by operating room personnel during surgical procedures to protect both the surgical patient and the operating room personnel from transfer of microorganisms, body fluids, and particulate material.	Same
Material Composition	SMS nonwoven, white knitted cuff, white spunbond, and BVB  Note: BVB Splicing Surgical Gown (Level 4) has a different material for the back of the gown (SMS nonwoven fabric). The back of the gown for the BVB Surgical Gown (Level 4) is made with BVB material.	SMS nonwoven, white knitted cuff, white spunbond, and BVB  Note: Sterile AAMI Level 4 Splicing Surgical gown has a different material for the back of the gown (SMS nonwoven fabric). The back of the gown for the Sterile AAMI Level 4 Surgical gown is made with BVB material.	Same
Regulation, Classification, Product Code	Regulation Number: 21 CFR §878.4040 Device Class: Class II Regulation Name: Surgical Apparel Product Code: FYA	Regulation Number: 21 CFR §878.4040 Device Class: Class II Regulation Name: Surgical Apparel Product Code: FYA	Same
Product Color	Blue	Blue	Same
Style	Non-Reinforced	Non-Reinforced	Same
Weight per square (g/m²)	For level 4 Surgical gown: 68 g/m² for gown body material  For level 4 Splicing Surgical Gown: 68 g/m² for gown front and sleeve material, with 40 g/m² for gown back material	For level 4 Surgical gown: 68 g/m² for gown body material  For level 4 Splicing Surgical Gown: 68 g/m² for gown front and sleeve material, with 40 g/m² for gown back material	Same
Product Sizes	M, L, XL, XXL, XXXL and XXXL-XL	M, L, XL, XXL, XXXL and XXXL-XL	Same
Sterility	Sterile (EO)	Sterile (EO)	Similar
Level	Level 4 per AAMI PB70	Level 4 per AAMI PB70	Same
Use	Single Use; Disposable	Single Use; Disposable	Same

Biocompatibility	Under the conditions of each	Under the conditions of	Same
	study, the Xuchang Zhengde	each study, the Dukal	
	Environstar Medical Products	Sterile AAMI Level 4	
	Co., Ltd BVB Surgical Gown	Surgical Gown & Sterile	
	(Level 4) & BVB Splicing Surgical	AAMI Level 4 Splicing	
	Gown (Level 4) are non-	Surgical Gown are non-	
	cytotoxic (ISO 10993-5), are	cytotoxic (ISO 10993-5),	
	non-irritating (ISO 10993-10),	are non-irritating (ISO	
	and are non-sensitizing (ISO	10993-10), and are non-	
	10993-10).	sensitizing (ISO 10993-10).	

## **Comparison Summary of Non-Clinical Testing Results**

**AAMI Level 3 Surgical Gowns:** 

Test	Test Results of Predicate Device Xuchang Zhengde Environstar Medical Products Co., Ltd SMS Standard Surgical Gown (Level 3) & SMS Surgical Gown with Reinforcement (Level 3) (K192290) (Conforms to ANSI/AAMI PB70:2012 Level 3 requirements)  Test Result Dukal Ster Reinforced Sterile AAI Gown (Cor ANSI/AAMI 3 requirem		Comparison
Flammability		Class I	Same
(16 CFR 1610)	Class I		
Water Resistance- Hydrostatic Pressure (AATCC 127)	≥50 cm H <sub>2</sub> O	≥50 cm H <sub>2</sub> O	Same
Water Resistance- Impact Penetration (AATCC 42)	≤1.0 g	≤1.0 g	Same
Tensile strength (ASTM D 5034)	Latitude/Transverse: ≥30N Longitude: ≥30N	Latitude/Transverse: ≥30N Longitude: ≥30N	Same
Tear strength (ASTM D 5733)	Latitude/Transverse: ≥10N Longitude: ≥10N	Latitude/Transverse: ≥10N Longitude: ≥10N	Same

Seam Strength	≥70 N	≥70 N	Same
(ASTM D 1683)			
Lint Generation	Size of particles counted: 3mcg-	Size of particles counted:	Same
(ISO 9073-10)	25mcg	3mcg-25mcg	
Air Permeability	Test Pressure: 125Pa; Test area	Test Pressure: 125Pa; Test	Same
(ASTM D737-18)	38 cm <sup>2</sup>	area 38 cm <sup>2</sup>	
(			
Biocompatibilit	Under the	Under the	Same
y-Cytotoxicity	conditions of the study,	conditions of the	
(ISO 10993-5),	the device did not show	study, the device did	
Irritation &	cytotoxicity potential.	not show cytotoxicity	
Sensitization		potential.	
(ISO 10993-10);	<ul> <li>Under the</li> </ul>		
EO Sterilization	conditions of the study,	<ul> <li>Under the</li> </ul>	
Residual (ISO	the irritation response	conditions of the	
10993-7)	category of the device	study, the irritation	
	was classified as	response category of	
	Negligible.	the device was	
		classified as	
	Under the	Negligible.	
	conditions of the study,		
	the device showed no	Under the	
	significant evidence of	conditions of the	
	causing delayed dermal	study, the device	
	contact sensitization.	showed no significant	
	Facility of a Sta	evidence of causing	
	For the sterile	delayed dermal	
	surgical gown: the device passed the Ethylene	contact sensitization.	
	Oxide Sterilization	For the sterile surgical	
	Residuals testing. The	gown: the device	
	residual of EO did not	passed the Ethylene	
	exceed 4mg/device and	Oxide Sterilization	
	ECH did not exceed	Residuals testing. The	
	9mg/device. The TCL of	residual of EO did not	
	EO did not exceed 10	exceed 4mg/device	
	μg/cm² and ECH did not	and ECH did not	
	exceed 5000μg/cm².	exceed 9mg/device.	
		The TCL of EO did not	
		exceed 10 μg/cm <sup>2</sup> and	
		ECH did not exceed	
		5000μg/cm².	

## **AAMI Level 4 Surgical Gowns:**

Test	Test Results of Predicate Device Xuchang Zhengde Environstar Medical Products Co., Ltd BVB Surgical Gown (Level 4) & BVB Splicing Surgical Gown (Level 4) (K192290)(Conforms to ANSI/AAMI PB70:2012 Level 4 requirements)	Test Results of Subject Device Dukal Sterile AAMI Level 4 Surgical Gown & Sterile AAMI Level 4 Splicing Surgical Gown (Conforms to ANSI/AAMI PB70:2012 Level 4 requirements)	Comparison
Flammability			Same
(16 CFR 1610)	Class I	Class I	
	Passed	Passed	Same
Resistance Bacteriophage Phi-X174 (ASTM F1671/F1671M- 13)			
	≥120 cm H <sub>2</sub> O	≥120 cm H <sub>2</sub> O	Same
Water Resistance- Hydrostatic			
Pressure			
(AATCC 127)	4.0	4.0	
Water Resistance- Impact Penetration(AA TCC 42)	≤1.0 g	≤1.0 g	Same
Tensile strength (ASTM D 5034)	Latitude/Transverse: ≥30N Longitude: ≥30N	Latitude/Transverse: ≥30N Longitude: ≥30N	Same
Tear strength ASTM D 5733	Latitude/Transverse: ≥10N Longitude: ≥10N	Latitude/Transverse: ≥10N Longitude: ≥10N	Same
Seam Strength (ASTM D 1683)	≥70 N	≥70 N	Same
Lint Generation (ISO 9073-10)	Size of particles counted: 3mcg- 25mcg	Size of particles counted: 3mcg-25mcg	Same
Air Permeability (ASTM D737-18)	Test Pressure: 125Pa; Test area 38 cm <sup>2</sup>	Test Pressure: 125Pa; Test area 38 cm <sup>2</sup>	Same

Biocompatibilit y-Cytotoxicity (ISO 10993-5), Irritation & Sensitization (ISO 10993-10); EO Sterilization Residual (ISO 10993-7)

- Under the conditions of the study, the device did not show cytotoxicity potential.
- Under the conditions of the study, the irritation response category of the device was classified as Negligible.
- Under the conditions of the study, the device showed no significant evidence of causing delayed dermal contact sensitization.
- For the sterile surgical gown: the device passed the Ethylene Oxide Sterilization Residuals testing. The residual of EO did not exceed 4mg/device and ECH did not exceed 9mg/device. The TCL of EO did not exceed 10 µg/cm² and ECH did not exceed 5000µg/cm².

- Under the conditions of the study, the device did not show cytotoxicity potential.
- Under the conditions of the study, the irritation response category of the device was classified as Negligible.
- Under the conditions of the study, the device showed no significant evidence of causing delayed dermal contact sensitization.
- For the sterile surgical gown: the device passed the Ethylene Oxide Sterilization Residuals testing. The residual of EO did not exceed 4mg/device and ECH did not exceed 9mg/device. The TCL of EO did not exceed 10 μg/cm² and ECH did not exceed 5000μg/cm².

Same

#### **Non-Clinical Test Results:**

The subject surgical gowns were tested and found conformance with the following standards:

- 16 CFR Part 1610 Standard for the Flammability of Clothing Textiles
- AATCC 127: 2017 Water Resistance: Hydrostatic Pressure Test
- AATCC 42:2017 Water Resistance: Impact Penetration Test
- ASTM F1671/F1671M-13 Standard Test Method for Resistance to Materials Used in Protective Clothing to Penetration by Blood-Borne Pathogens Using Phi-X174 Bacteriophage as a Test System

- ANSI AAMI PB70: 2012 Liquid Barrier Performance and Classification of Protective Apparel and Drapes Intended For Use in Health Care Facilities
- ISO 9073-10:2003 Textiles-Test Methods for Nonwovens-Part 10: Lint and Other Particles Generation in the Dry State
- ASTM D1683/D1683M-17:2017/(R)2018 Standard Test Method for Failure in Sewn Seams of Woven Fabrics
- ASTM D5733-99 Standard Test Method for Tearing Strength of Nonwoven Fabrics by the Trapezoid Procedure
- ASTM D5034-09:2017 Standard Test Method for Breaking Strength and Elongation of Textile Fabrics (Grab Test)
- ASTM D737-18:2018 Standard Test Method for Air Permeability of Textile Fabrics
- ASTM F88/F88M-15 Standard Test Method for Seal Strength of Flexible Barrier Materials
- ASTM F1929-15 Standard Test Method for Detecting Seal Leaks in Porous Medical Packaging by Dye Penetration
- ISO 10993-7:2008 Biological Evaluation of Medical Devices-Part 7:Ethylene Oxide Sterilization Residuals
- ISO 10993-5:2009 Biological Evaluation of Medical Devices-Part 5: Tests for in Vitro Cytotoxicity
- ISO 10993-10:2010 Biological Evaluation of Medical Devices-Part 10: Tests for Irritation and Skin Sensitization

#### **Summary for Non-Clinical Testing:**

#### **AAMI Level 3 Surgical Gowns:**

Test Item	Test Standard Methods	Test Requirements	Test Results of Subject Device Dukal Sterile AAMI Level 3 Reinforced Surgical Gown & Sterile AAMI Level 3 Surgical Gown	Remark
Impact penetration	AATCC 42	≤1.0g (for AAMI Level 3)	≤1.0g	Meets requirement
Hydrostatic pressure	AATCC 127	≥50cm H2O (for AAMI Level 3)	≥50cm H2O	Meets requirement
Tensile strength	ASTM D 5034	Latitude/Transverse: ≥30N Longitude: ≥30N	Latitude/Transverse: ≥30N Longitude: ≥30N	Meets requirement
Tear resistance	ASTM D 5733	≥10N	Latitude/Transverse: ≥10N Longitude: ≥10N	Meets requirement

Seam strength	ASTM D 1683	≥30N	≥70N	Meets requirement
Dye penetration	ASTM F 1929	No leakage	No leakage	Meets requirement
Sealing strength	ASTM F 88	≥3N (180°)	≥3N (180°)	Meets requirement
Flammability	16 CFR Part 1610	Class I	Class I	Meets requirement
Lint generation	ISO 9073-10	Size of particles counted: 3mcg-25mcg	Size of particles counted: 3mcg-25mcg	Meets requirement
Air permeability	ASTM D737	Test Pressure: 125Pa; Test area 38 cm²	Test Pressure: 125Pa; Test area 38 cm²	Meets requirement
Biocompatibility	ISO 10993-5 ISO 10993- 10 ISO 10993-7	does not show cytotoxicity potential.  -Under the conditions of the study, the irritation response category of the device is classified as Negligible.  -Under the conditions of the study, the device shows no significant evidence of causing delayed dermal contact sensitization.  - The residual of EO does not exceed 4mg/device and ECH does not exceed	evidence of causing delayed dermal contact sensitization.  - The residual of EO did not exceed 4mg/device and ECH did not exceed 9mg/device. The TCL of EO did not exceed 10 µg/cm² and ECH did not exceed	Meets requirement

**AAMI Level 4 Surgical Gowns:** 

7	ei 4 Surgica			
Test Item	Test Standard Methods	Test Requirements	Test Results of Subject Device Dukal Sterile AAMI Level 4 Surgical Gown & Sterile AAMI Level 4 Splicing Surgical Gown	Remark
Blood-Borne Pathogens penetration	ASTM F1671	Pass (For AAMI Level 4 Requirements): None Seen for Penetration of Phi-X174 Bacteriophage	Pass	Meets requirement
Impact penetration	AATCC 42	≤1.0g	≤1.0g	Meets requirement
Hydrostatic pressure	AATCC 127	≥120cm H2O	≥120cm H2O	Meets requirement
Tensile strength	ASTM D 5034	Latitude/Transverse: ≥30N Longitude: ≥30N	Latitude/Transverse: ≥30N Longitude: ≥30N	Meets requirement
Tear resistance	5733	Latitude/Transverse: ≥10N Longitude: ≥10N	Latitude/Transverse: ≥10N Longitude: ≥10N	Meets requirement
Seam strength	ASTM D 1683	≥30N	≥70N	Meets requirement
Dye penetration	ASTM F 1929	No leakage	No leakage	Meets requirement
Sealing strength	ASTM F 88	≥3N (180°)	≥3N (180°)	Meets requirement
Flammability	16 CFR Part 1610	Class I	Class I	Meets requirement
Lint generation		*	Size of particles counted: 3mcg-25mcg	Meets requirement
Air permeability	ASTM D737	Test Pressure: 125Pa; Test area 38 cm²	Test Pressure: 125Pa; Test area 38 cm²	Meets requirement

		-Under the conditions	-Under the conditions of	Meets requirement
		of the study, the device	the study, the device did	•
		does not show	not show cytotoxicity	
		cytotoxicity potential.	potential.	
		-Under the conditions	-Under the conditions of	
		of the study, the	the study, the irritation	
		irritation response	response category of the	
	ISO 10993- 5	category of the device	device was classified as	
		is classified as	Negligible.	
		Negligible.	-Under the conditions of	
		-Under the conditions	the study, the device	
	ISO 10993- 10	of the study, the device	showed no significant	
		shows no significant	evidence of causing delayed	
		evidence of causing	dermal contact	
		delayed dermal contact	sensitization.	
		sensitization.	- The residual of EO did not	
		- The residual of EO	exceed 4mg/device and	
		does not exceed	ECH did not exceed	
		4mg/device and ECH	9mg/device. The TCL of EO	
		does not exceed	did not exceed 10 μg/cm²	
		9mg/device. The TCL of	and ECH did not exceed	
		EO does not exceed 10	$5000 \mu g/cm^2$ .	
		μg/cm <sup>2</sup> and ECH does		
		not exceed		
		5000μg/cm².		

**Summary for Clinical Testing:** Not Applicable

**Conclusions:** The conclusion drawn from the nonclinical tests demonstrates that the subject device in this 510(k) submission, Dukal Sterile AAMI Level 3 Reinforced Surgical Gown, Sterile AAMI Level 3 Surgical Gown, Sterile AAMI Level 4 Surgical Gown, Sterile AAMI Level 4 Splicing Surgical Gown, are as safe, as effective, and perform as well as or better than the legally marketed predicate device cleared under K192290.