

August 5, 2021

Jiangsu Cureguard Glove Co., Ltd. % Boyle Wang Official Correspondent Shanghai Truthful Information Technology Co., Ltd. RM.1801, No.161 Lujiazui East Rd., Pudong Shanghai, 200120 China

Re: K211608

Trade/Device Name: Disposable Nitrile Medical Examination Glove (Tested for Use with Chemotherapy Drugs)
Regulation Number: 21 CFR 880.6250
Regulation Name: Non-Powdered Patient Examination Glove
Regulatory Class: Class I, reserved
Product Code: LZA, LZC
Dated: May 5, 2021
Received: May 25, 2021

Dear Boyle Wang:

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 Federal Register.

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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</u>) and CDRH Learn (<u>https://www.fda.gov/training-and-continuing-education/cdrh-learn</u>). 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 (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</u>) for more information or contact DICE by email (<u>DICE@fda.hhs.gov</u>) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

For 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

#### **Indications for Use**

510(k) Number *(if known)* K211608

#### **Device Name**

Nitrile Exam Gloves, Powder Free,Blue (Tested for use with Chemotherapy Drugs)

Indications for Use (Describe)

A patient examination glove is a disposable device intended for medical purposes that is worn on the examiner's hands to prevent contamination between patient and examiner.

These gloves were tested for use with chemotherapy drugs, as per ASTM D6978-05 (Reapproved 2019) Standard Practice for Assessment of Medical Gloves to Permeation by Chemotherapy Drugs.

Chemotherapy Drug	Concentration	Breakthrough Detection Time in Minutes
Carmustine (BCNU)	3.3 mg/ml (3,300 ppm)	23.6 Minutes
Cisplatin	1.0 mg/ml(1,000 ppm)	> 240 Minutes
Cyclophosphamide (Cytoxan)	20.0 mg/ml(20,000 ppm)	> 240 Minutes
Dacarbazine (DTIC)	10.0 mg/ml(10,000 ppm)	> 240 Minutes
Doxorubicin HCl	2.0 mg/ml(2,000 ppm)	> 240 Minutes
Etoposide	20.0 mg/ml(20,000 ppm)	> 240 Minutes
Fluorouracil	50.0 mg/ml(50,000 ppm)	>240 Minutes
Methotrexate	25 mg/ml(25,000 ppm)	>240 Minutes
Mitomycin C	0.5 mg/ml(500 ppm)	> 240 Minutes
Paclitaxel	6.0 mg/ml(6,000 ppm)	>240 Minutes
Thio Tepa	10.0 mg/ml(10,000 ppm)	57.4 Minutes
Vincristine Sulfate	1.0 mg/ml(1,000 ppm)	> 240 Minutes

Please note that the following drugs have low permeation times: Carmustine (BCNU) 3.3 mg/ml 23.6 Minutes Thio-Tepa 10.0 mg/ml 57.4 Minutes

Caution: Testing showed an average breakthrough time of 57.4 minutes with Thio-Tepa WARNING: Do not use with Carmustine

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.

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# 510(k) Summary (K211608)

This summary of 510(k) is being submitted in accordance with 21 CFR 807.92.

#### 1.0 Submitter's Information

 Name: Jiangsu Cureguard Glove Co., Ltd.
 Address: No.65 Shenzhen Road, The Economic Development Zone, Suqian , Jiangsu, 223800 China.
 Phone Number: +86-13485097856
 Contact: Guo Hua
 Date of Preparation: Aug.5,2021

#### **Designated Submission Correspondent**

Mr. Boyle Wang Shanghai Truthful Information Technology Co., Ltd. Room 1801, No. 161 East Lujiazui Rd., Pudong,Shanghai 200120 ,China Tel: +86-21-50313932 Email: Info@truthful.com.cn

#### 2.0 Device Information

Trade name:Disposable Nitrile Medical Examination Glove(Tested for<br/>Use with Chemotherapy Drugs)Common name:Patient Examination GlovesClassification name:Non-powdered patient examination glove<br/>XS,S, M, L, XL

#### 3.0 Classification

Production code:LZA,LZCRegulation number:21CFR880.6250Classification:Class IPanel:General Hospital

#### 4.0 Predicate Device Information

Manufacturer: Medline Industries, Inc. Device: Medline Powder-Free Light Blue Nitrile Exam Glove (Tested for Use with Chemotherapy Drugs)

#### 510(k) number: K201390

#### 5.0 <u>Device Description</u>

The subject device is single use, disposable gloves intended for medical purposes to be worn on the examiner's hands to prevent contamination between patient and examiner. The gloves are powder-free, ambidextrous with beaded cuff, blue colored, nitrile, and tested for use with chemotherapy drugs. The gloves are offered in five sizes: extra-small, small, medium, large, and extra-large.

#### 6.0 Indication for Use

A patient examination glove is a disposable device intended for medical purposes that is worn on the examiner's hands to prevent contamination between patient and examiner.

These gloves were tested for use with chemotherapy drugs, per ASTM D6978-05 Standard Practice for Assessment of Resistance of Medical Gloves to Permeation by Chemotherapy Drugs.

Chemotherapy Drug	Concentration	Breakthrough Detection Time in Minutes
Carmustine (BCNU)	3.3 mg/ml (3,300 ppm)	22.9
Cisplatin	1.0 mg/ml(1,000 ppm)	> 240
Cyclophosphamide	20.0 mg/ml(20,000 ppm)	> 240
(Cytoxan)		
Dacarbazine (DTIC)	10.0 mg/ml(10,000 ppm)	> 240
Doxorubicin HCI	2.0 mg/ml(2,000 ppm)	> 240
Etoposide	20.0 mg/ml(20,000 ppm)	> 240
Fluorouracil	50.0 mg/ml(50,000 ppm)	> 240
Methotrexate	25 mg/ml(25,000 ppm)	> 240
Mitomycin C	0.5 mg/ml(500 ppm)	> 240
Paclitaxel	6.0 mg/ml(6,000 ppm)	> 240
Thio Tepa	10.0 mg/ml(10,000 ppm)	44.2
Vincristine Sulfate	1.0 mg/ml(1,000 ppm)	> 240

Please note that the following drugs have low permeation times: Carmustine (BCNU) 3.3 mg/ml 22.9 Minutes; Thio Tepa 10.0 mg/ml 44.2 Minutes.

Caution: Testing showed an average breakthrough time of 44.2 minutes with Thio-Tepa

WARNING: Do not use with Carmustine

# 7.0 Technological Characteristic Comparison Table

Table1-General Comparison						
ltem	Subject Device	Predicated Device	Remark			
nem	(K211608)	(K201390)	Rellidik			
Product Code	LZA,LZC	LZA,LZC	Same			
Regulation No.	21CFR880.6250	21CFR880.6250	Same			
Class	I	I	Same			
Intended Use	A patient examination glove is a disposable device intended for medical purposes that is worn on the examiner's hand to prevent contamination between patient and examiner. These gloves were tested for use with chemotherapy drugs as per ASTM D6978- 05(2019) Standard Practice for Assessment of Resistance of Medical Gloves to Permeation by Chemotherapy Drugs.	A patient examination glove is a disposable device intended for medical purposes that is worn on the examiner's hand to prevent contamination between patient and examiner. These gloves were tested for use with chemotherapy drugs as per ASTM D6978- 05(2019) Standard Practice for Assessment of Resistance of Medical Gloves to Permeation by Chemotherapy Drugs.	Same			
Powdered or Powered free	Powdered free	Powdered free	Same			
Design Feature	Ambidextrous	Ambidextrous	Same			
Sterility	Non-Sterile	Non-Sterile	Same			
Labeling Information	Single-use indication, powder free, device color, device name, glove size and quantity, Non-Sterile, a statement of standard ASTM D6978-05 compliance and a summary of the testing results.	Single-use indication, powder free, device color, device name, glove size and quantity, Non-Sterile, a statement of standard ASTM D6978-05 compliance and a summary of the testing results.	Same			

## **Table1-General Comparison**

# **Table2 Device Dimensions Comparison**

	Designation	Size				Tolerance	
Predicate	Designation	XS	S	М	L	XL	Tolerance
Device(K201390)	Length, mm	NA	240	240	240	240	min
	Width, mm	NA	85	95	105	115	±10

	Thickness, mm:						
	Finger	0.16					min
	Palm	0.14					min
	Designation	Size			<b>T</b> .		
	Designation	XS	S	М	L	XL	Tolerance
Subject Device	Length, mm	220	220	230	230	230	min
(K211608)	Width, mm	70	80	95	110	120	±10
	Thickness, mm:						
	Finger			0.05			min
	Palm	0.05					min
Remark			Dif	ferent			

Analysis: The physical dimensions are different with that of the predicate, but they all meet the requirements of ASTM D6319-19, so the differences do not raise any new safety or performance questions.

Item		Subject device	Predicated device	Remark	
nem			(K211608)	(K201390)	Remark
Colorant	Colorant		Blue	Light Blue	Different
	Before	Tensile Strength	14Mpa, min	17Mpa, min	Different
	Aging	Ultimate	500% min	500% min	Same
		Elongation			Came
Physical Properties	After	Tensile Strength	14Mpa, min	14Mpa, min	Same
	Aging	Ultimate Elongation	400%min	400%min	Same
	Comply with ASTM D6319		19	Comply with ASTM D6319	Same
Freedom from Holes in acco				BefreefromholeswhentestedinaccordancewithASTMD5151 AQL=2.5	Same
Powder Cont	ent	• •	glove, Meet the of ASTM D6124	Meet the requirements of ASTM D6124	Same
Carmustine (B0 22.9 Minutes		CNU) 3.3 mg/ml:	Carmustine (BCNU) 3.3 mg/ml: 25.3 Minutes	Different	
	Cisplatin 1. Minutes		mg/ml: > 240	Cisplatin 1.0 mg/ml: ≥240 Minutes	Same
Cyclophosphamide (Cytoxan) 20.0 mg/ml: > 240 Minutes		Cyclophosphamide (Cytoxan)	Same		

#### Table3 Performance Comparison

		20.0 mg/ml: ≥240 Minutes	
	Dacarbazine (DTIC) 10.0 mg/ml:> 240 Minutes	Dacarbazine (DTIC) 10.0 mg/ml: ≥240 Minutes	Same
	Doxorubicin HCl 2.0 mg/ml: > 240 Minutes	Doxorubicin Hydrochloride 2.0 mg/ml: ≥240 Minutes	Same
	Etoposide 20.0 mg/ml: $> 240$ Minutes	Etoposide (Toposar) 20.0 mg/ml: ≥240 Minutes	Same
Chemotherapy Drugs Tested with Minimum	Fluorouracil 50.0 mg/ml: >240 Minutes	Fluorouracil 50.0 mg/ml: ≥240 Minutes	Same
Breakthrough Detection Time as Tested per ASTM D	Methotrexate 25 mg/ml: >240 Minutes	Methotrexate 25 mg/ml: ≥240 Minutes	Same
6978	Mitomycin C 0.5 mg/ml: > 240 Minutes	Mitomycin C 0.5 mg/ml: ≥ 240 Minutes	Same
	Paclitaxel 6.0 mg/ml: > 240 Minutes	Paclitaxel (Taxol) 6.0 mg/ml: ≥240 Minutes	Same
	Thio Tepa 10.0 mg/ml: 44.2 Minutes	Thio-Tepa 10.0 mg/ml: 43.7 Minutes	Different
	Vincristine Sulfate 1.0 mg/ml: > 240 Minutes	Vincristine Sulfate (Oncovin) 1.0 mg/ml: ≥240 Minutes	Same

## **Table4 Safety Comparison**

Item		Subject device (K211608)	Predicated device (K201390)	Remark
Material		Nitrile	Nitrile	Same
	Irritation (ISO 10993- 10:2010 Biological Evaluation of Medical Devices – Part 10: Tests For Irritation And Skin Sensitization (ISO 10993-10:2010	Under the conditions of the study, not an irritant Under conditions of	Comply with ISO10993-10	Same

Biological Evaluation of Medical Devices – Part 10: Tests For Irritation And Skin Sensitization)	the study, not a sensitizer.		
Cytotoxicity (ISO 10993-5:2009 Biological Evaluation of Medical Devices – Part 5: Tests For In Vitro Cytotoxicity)	Under conditions of the study, device extract is not cytotoxic	the study,	Different
Acute Systemic Toxicity(ISO 10993- 11:2017,Biological evaluation of medical devices - Part 11: Tests for systemic toxicity.)	N/A	Under conditions of the study, device extract is non-toxic	Different

## 8.0 Summary of Non-Clinical Testing

The biocompatibility evaluation for Disposable Nitrile Medical Examination Glove(Tested for Use with Chemotherapy Drugs) was conducted in accordance with the following standards:

ISO 10993-10:2010 Biological Evaluation of Medical Devices – Part 10: Tests for Irritation And Skin Sensitization.

ISO 10993-5:2009 Biological Evaluation of Medical Devices – Part 5: Tests For In Vitro Cytotoxicity

Performance Testing (Bench)

Physical performance qualities of the proposed device were evaluated per ASTM D6319-10, *Standard Specification for Nitrile Examination Gloves for Medical Application.* 

Permeation testing was conducted to support the addition of the labeling claim: *Tested for use with chemotherapy drugs*. In addition, the proposed device was tested according to ASTM D6978-05 (Reapproved 2019), *Standard Practice for Assessment of Resistance of Medical Gloves to Permeation by Chemotherapy Drugs*, in which minimum breakthrough times were determined for a wide range of chemotherapy drugs.

In summary, the performance testing of the subject device was conducted to adequately demonstrate the effectiveness of the device in accordance with the relevant test methods cited below:

- ASTM D6124-06 (Reapproved 2017), Standard Test Method for Residual Powder on Medical Gloves
- ASTM D5151-19, Standard Test Method for Detection of Holes in Medical Gloves.
- ASTM D6319-19, Standard Specification for Nitrile Examination Gloves for Medical Application.
- ASTM D 6978-05 (Reapproved 2019) Standard Practice for Assessment of Resistance of Medical Gloves to Permeation by Chemotherapy Drugs.

Test Method	Purpose	Acceptance Criteria	Results
		Length(mm):	Length:>230
		XS/S:≥220;	Width:
		M/L/XL: ≥230;	Lot1:
		Width(mm):	XS: 77-81;
		XS: 70±10;	S: 85-89
		S: 80±10;	M: 97-100
		M: 95±10;	L: 108-114
		L: 110±10;	XL: 117-120
		XL: 120±10	Lot2:
			XS: 78-80
			S: 85-90
	Physical		M: 97-100
ASTM D6319	Dimensions		L: 109-114
ASTIVI DOST9	Test		XL: 117-1120
	Test		Lot3:
			XS: 77-81
			S: 85-89
			M: 97-100
			L: 109-113
			XL: 117-121
			<u>Pass</u>
			Lot1:
			XS:
			Finger: 0.08-0.10
			Palm: 0.08-0.10
			S:

#### Table 5 Summary of Non-Clinical Testing

	Finger: 0.07-0.11 Palm: 0.08-0.09 M: Finger: 0.08-0.10
	Palm: 0.08-0.10 L: Finger: 0.08-0.12 Palm: 0.08-0.12 XL: Finger: 0.08-0.13
	Palm: 0.08-0.11 Lot2: XS: Finger: 0.08-0.10 Palm: 0.08-0.11 S:
Thickness (mm) : Finger: ≥0.05 Palm: ≥0.05	Finger: 0.08-0.10 Palm: 0.08-0.12 M: Finger: 0.08-0.12 Palm: 0.08-0.11
	L: Finger: 0.08-0.12 Palm: 0.08-0.12 XL:
	Finger: 0.08-0.13 Palm: 0.08-0.12 Lot3: XS: Finger: 0.08-0.10
	Palm: 0.08-0.10 S: Finger: 0.08-0.11 Palm: 0.08-0.10
	M: Finger: 0.08-0.12 Palm: 0.08-0.12 L: Finger: 0.08-0.11

					Palm: 0.08-0.12	
					XL:	
					Finger: 0.08-0.13	
					Palm: 0.08-0.15	
					Pass	
ASTM D5151	Watertightness	Meet t	he requirer	nents of	XS:0/125 leaks	
	Test for		)5151 AQL 2.		S:1/125 leaks	
	Detection of		/0101/1QL 2.	0	M:0/125 leaks	
	Holes				L:0/125 leaks	
					XL:0/125 leaks	
					Pass	
ASTM D6124	Powder Content	Meet t	he requirer	nents of	0.10 mg/Pass	
			)6124 < 2.0m	0.10 mg/1 000		
		Before	Tensile	s ≥14MPa	Lot 1:15.4-17.1	
		Aging	Strength		Lot2:15.6-17.3	
		/ ging	Ouchgui		Lot3:15.7-16.6	
					Pass	
			Ultimate	≥500%	Lot1:542-580	
			Elongation	-00070	Lot 2:542-570	
			Liongation		Lot3:545-562	
	Physical				Pass	
ASTM D412	properties	After	Tensile	≥14MPa	Lot 1:15.6-17.0	
	properties	Aging	Strength		Lot2:15.8-17.0	
		7.9.1.9	ouongui		Lot3:15.4-19.2	
					Pass	
			Ultimate	≥400%	Lot1:546-577	
			Elongation	_ 100 /0	Lot 2:547-572	
			Liongation		Lot3:536-571	
					Pass	
		Carmus	tine (BCNU)	1. 3.3 ma/ml·	22.9 Minutes	
			n 1.0 mg/ml:			
		-	•		20.0 mg/ml: $> 240$	
	Chemotherapy	Minutes	•	Cytonally /	2	
	Drugs			10 0 ma/m	I:> 240 Minutes	
ASTM	Tested with		, ,	•	240 Minutes	
D6978	Minimum			•		
	Breakthrough	Etoposide 20.0 mg/ml: > 240 Minutes Fluorouracil 50.0 mg/ml: >240 Minutes				
	Detection Time					
			•			
		wittomyc	cin C 0.5 mg/	III. ∕ Z4U	iviinules	

		$D_{r}$ a literal C. 0, may make $\geq$ 240 Minutes	
		Paclitaxel 6.0 mg/ml: > 240 Minutes	
		Thio Tepa 10.0 mg/ml: 44.2 Minutes	
		Vincristine Sulfate 1.0 mg/ml: > 240 Minutes	
ISO 10993-5	Cytotoxicity	Non-cytotoxic	Under conditions of
			the study, did not
			show potential
			toxicity to L-929
			cells.
			<u>Pass</u>
ISO 10993-10	Irritation	Non-irritating	Under the
			conditions of the
			study, not an
			irritant.
			<u>Pass</u>
ISO 10993-10	Sensitization	Non-sensitizing	Under conditions of
			the study, not a
			sensitizer.
			<u>Pass</u>

# 9.0 Summary of Clinical Testing

Clinical testing is not needed for this device.

## 10.0 <u>Conclusion</u>

The conclusions drawn from the nonclinical tests demonstrate that the subject device, Disposable Nitrile Medical Examination Glove(Tested for Use with Chemotherapy Drugs) is as safe, as effective, and performs as well as or better than the legally marketed predicated device under K201390.