

#### September 20, 2022

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

Re: K222642

Trade/Device Name: Disposable Nitrile Examination Glove (Tested for use with Chemotherapy Drug)

Regulation Number: 21 CFR 880.6250

Regulation Name: Non-Powdered Patient Examination Glove

Regulatory Class: Class I, reserved

Product Code: LZA, LZC Dated: September 1, 2022 Received: September 1, 2022

#### 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 <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/medical-devices/device-advice-comprehensive-regulatory-assistance</a>) and CDRH Learn (<a href="https://www.fda.gov/training-and-continuing-education/cdrh-learn">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">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,

Bifeng Qian, M.D., 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)	
K222642	
Device Name Disposable Nitrile Examination Glove(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)	22.0 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)	59.2 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 22.0 Minutes

Thio-Tepa 10.0 mg/ml 59.2 Minutes

Caution: Testing showed an average breakthrough time of 59.2 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
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#### CONTINUE ON A SEPARATE PAGE IF NEEDED.

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

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# K222642 510(k) Summary

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

#### 1.0 Submitter's Information

Name: Inner Mongolia Cureguard Medical Technology Co.,Ltd.

Address: Room 326, Management Committee of New Industrial Park,

Tumote youqi, Baotou, Inner Mongolia Autonomous Region

014100, China.

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#### **Designated Submission Correspondent**

Contact: Mr. Boyle Wang

Address: Shanghai Truthful Information Technology Co., Ltd.

Room 1801, No.161 East Lu Jiazui Rd., Pudong, Shanghai,

200120 China

Tel: +86-21-50313932 Email: info@truthful.com.cn

Date submitted: Aug.9,2022

#### 2.0 <u>Device Information</u>

Trade name: Disposable Nitrile Examination Glove (Tested for Use with

Chemotherapy Drugs)

Common name: Patient Examination Gloves

Classification name: Non-powdered patient examination glove

Model(s): XS,S, M, L, XL

Production code: LZA,LZC

Regulation number: 21CFR880.6250

Classification: Class I

Panel: General Hospital

#### 3.0 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

#### 4.0 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)	22.0
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)	59.2
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 22.0 Minutes;

Thio Tepa 10.0 mg/ml 59.2 Minutes.

Caution: Testing showed an average breakthrough time of 59.2 minutes with Thio-

Tepa

WARNING: Do not use with Carmustine.

#### 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 <u>Technological Characteristic Comparison Table</u>

Item Subject Device	Predicated Device	Remark
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		(K201390)	
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

### **Table2 Device Dimensions Comparison**

	Designation	Size				Talaranaa	
	Designation	XS	S	М	L	XL	Tolerance
Predicate	Length, mm	NA	240	240	240	240	min
Device(K201390)	Width, mm	NA	85	95	105	115	±10
	Thickness, mm:						
	Finger			0.16	•		min

	Palm		0.14				min
	Designation	Size				Tolerance	
	Designation -	XS	S	М	L	XL	Tolerance
Subject Device	Length, mm	220	220	230	230	230	min
	Width, mm	70	80	95	110	120	±10
	Thickness, mm:						
	Finger 0.05 min			min			
	Palm			0.05			min
Remark	Different						

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.

## **Table3 Performance Comparison**

Item			Subject device	Predicated device (K201390)	Remark
Colorant			Blue	Light Blue	Different
	Before	Tensile Strength	14Mpa, min	17Mpa, min	Different
Physical	Aging	Ultimate Elongation	500% min	500% min	Same
Propertie s	After	Tensile Strength	14Mpa, min	14Mpa, min	Same
5	Aging	Ultimate Elongation	400%min	400%min	Same
	Comply v	with ASTM D63	319	Comply with ASTM D6319	Same
Freedom   from		m holes when ccordance with AQL=2.5	Be free from holes when tested in accordance with ASTMD5151 AQL=2.5	Same	
Powder Co	Powder Content  Meet the requirements ASTM D6124<2.0mg		•	Meet the requirements of ASTM D6124	Same
		Carmustine (BCNU) 3.3 mg/ml: 22.0 Minutes		Carmustine (BCNU) 3.3 mg/ml: 25.3 Minutes	Different
Cisplatin 1.0 mg Minutes  Cyclophosphan (Cytoxan) 20.0		=	mg/ml: > 240	Cisplatin 1.0 mg/ml: ≥240 Minutes	Same
			Cyclophosphamide (Cytoxan)	Same	

	240 Minutes	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	Fluorouracil 50.0 mg/ml: > 240 Minutes	Fluorouracil 50.0 mg/ml: ≥240 Minutes	Same
Tested with Minimum Breakthrough	Methotrexate 25 mg/ml: > 240 Minutes	Methotrexate 25 mg/ml: ≥240 Minutes	Same
Detection Time as Tested per ASTM D 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: 59.2 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**

	Table+ Calety	Companison		
		Subject	Predicated	
Item		device	device	Remark
			(K201390)	
Material		Nitrile	Nitrile	Same
	Irritation (ISO			
	10993-10:2010			
	Biological	Under the		
	Evaluation of	conditions of	Comply with	
	Medical Devices -	the study, not	Comply with ISO10993-10	Same
	Part 10: Tests For	an irritant	13010993-10	
	Irritation And Skin			
	Sensitization)			
	Sensitization (ISO	Under		

	10993-10:2010	conditions of		
Biocompatibility	Biological	the study, not		
	Evaluation of	a sensitizer.		
	Medical Devices -			
	Part 10: Tests For			
	Irritation And Skin			
	Sensitization)			
	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	Under conditions of the study, device extract is cytotoxic	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.

**Table 5: Summary of Non-clinical Testing Table** 

Test Method	Purpose	Acceptance Criteria	Results
ASTM D6319	Physical Dimensions Test	Length(mm):	Length:>230
		XS/S:≥220;	Width:
		M/L/XL: ≥230;	XS: 72-74;
		Width(mm):	S: 80-83
		XS: 70±10;	M: 95-98
		S: 80±10;	L: 110-114
		M: 95±10;	XL: 118-121
		L: 110±10;	
		XL: 120±10	<u>Pass</u>
		Thickness (mm) :	
			XS:
			Finger: 0.07-0.10
			Palm: 0.08-0.10
			S:
			Finger: 0.08-0.11
			Palm: 0.08-0.11
			M:
		Finger: ≥0.05	Finger: 0.08-0.12
		Palm: ≥0.05	Palm: 0.07-0.11
			L:

	T	T			<u> </u>
					Finger: 0.08-0.12
					Palm: 0.08-0.11
					XL:
					Finger: 0.08-0.12
					Palm: 0.08-0.12
					<u>Pass</u>
ASTM D5151	Watertightness				XS:2/125 leaks
	Test for	Meet t	the requirer	S:0/125 leaks	
	Detection of	ASTM D	05151 AQL 2.	M:0/125 leaks	
	Holes			L: 1/125 leaks	
					XL: 0/125 leaks
				<u>Pass</u>	
ASTM D6124	Powder Content			XS:0.05mg	
				S:0.06mg	
		Meet t	the requirer	M:0.06mg	
		ASTM D6124 < 2.0mg			L:0.07mg
					XL:0.09mg
				<u>Pass</u>	
		Before	Tensile	≥14MPa	XS:15.4-17.3
		Aging	Strength		S:15.3-16.9
					M: 15.4-17.3
ASTM D412					L:15.4-17.6
					XL:15.3-17.1
					<u>Pass</u>
			Ultimate	≥500%	XS:524-569
			Elongation		S:525-568
	Physical				M: 525-567
7.01111 5-12	properties				L:527-566
					XL:520-570
					<u>Pass</u>
		After	Tensile	≥14MPa	XS:15.3-17.0
		Aging	Strength		S:15.4-16.9
					M:15.4-16.4
					L:15.3-16.6
					XL:15.2-17.2

			1		Page	
			Ultimate	≥400%	<u>Pass</u>	
				≥400%	XS:526-568	
			Elongation		S:522-570	
					M:527-570	
					L:521-567	
					XL:528-565	
					<u>Pass</u>	
		Carmustine (BCNU) 3.3 mg/ml: 22.0 Minutes  Cisplatin 1.0 mg/ml: > 240 Minutes  Cyclophosphamide (Cytoxan) 20.0 mg/ml: > 240 Minutes				
	Chemotherapy					
	Drugs	Dacarbazine (DTIC) 10.0 mg/ml:> 240 Minutes				
ASTM	Tested with	Doxorubicin HCl 2.0 mg/ml: > 240 Minutes				
D6978	Minimum	Etoposide 20.0 mg/ml: > 240 Minutes				
	Breakthrough	Fluorouracil 50.0 mg/ml: >240 Minutes				
	Detection Time	Methotrexate 25 mg/ml: >240 Minutes				
		Mitomycin C 0.5 mg/ml: > 240 Minutes				
		Paclitaxel 6.0 mg/ml: > 240 Minutes				
		Thio Tepa 10.0 mg/ml: 59.2 Minutes				
		Vincristine Sulfate 1.0 mg/ml: > 240 Minutes				
ISO 10993-5	Cytotoxicity	Non-cyt	otoxic		Under conditions of	
					the study, did not	
					show potential	
					toxicity to L-929	
					cells.	
					<u>Pass</u>	
ISO 10993-10	Irritation	Non-irrit	tating		Under the	
					conditions of the	
					study, not an	
					irritant.	
					<u>Pass</u>	
ISO 10993-10	Sensitization	Non-ser	nsitizing		Under conditions of	
			J		the study, not a	
					sensitizer.	
					Pass Pass	
	<u> </u>	L			<u> </u>	

# 9.0 Summary of Clinical Testing

Clinical testing is not needed for this device.

### 10.0 Conclusion

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