

4/29/99

**510K
SUMMARY**

K991161

Date Prepared 04/06/99

Submitted by Clark Smith D.M.D.

Kay-See Dental
124 East Missouri Avenue
Kansas City, MO 64106

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Contact Clark Smith D.M.D.

Prepared by
Barry Hale
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Belton, MO 64012
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Trade name - Hydro-Cast Acrylic Varnish

Common name - Acrylic Varnish

Classification Name - Resin, Denture, Relining, Repairing, Rebasing (872.3760)

Substantial equivalence claimed to - PalaSeal K892452

Description of the device.
Acrylic varnish.

Intended use of device

Is applied to cured materials such as dentures, partial dentures, dental splints, and temporary crowns/bridges for the purpose of sealing the acrylic surface.

TECHNOLOGICAL CHARACTERISIC COMPARISON

PalaSeal

Preparation of methyl methacrylate monomer, multifunctional methacrylates, light sensitizer, polymerization initiator.

Hydro-Cast Acrylic Varnish

Preparation of methyl methacrylate monomer, multifunction methacrylates, light sensitizer, polymerization.

Summary: The technological characteristics of the two devices are identical.

NON-CLINICAL TESTING AND DATA

The testing of Hydro-Cast Acrylic Varnish was conducted using five randomly drawn subgroups, with three samples taken from each subgroup. The samples were applied to acrylic denture surfaces and the drying time observed. The specification for drying time is, dry to the touch in < 3 minutes. All samples were dry in less than 3 minutes.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

APR 29 1999

Clark Smith, D.M.D.
Executive Vice President
Kay-See Dental Manufacturing Company
124 East Missouri Avenue
Kansas City, Missouri 64106-1294

Re: K991161
Trade Name: Hydro-Cast Acrylic Varnish, Model 78125
Regulatory Class: I
Product Code: EIA
Dated: April 6, 1999
Received: April 7, 1999

Dear Dr. Smith:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to 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). You may, therefore, market the device, subject to the general controls provisions of the Act. 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.

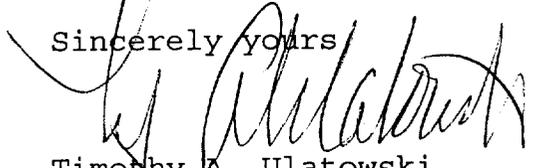
If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Good Manufacturing Practice for Medical Devices: General (GMP) regulation (21 CFR Part 820) and that, through periodic GMP inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

Page 2 - Dr. Smith

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4692. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its internet address "<http://www.fda.gov/cdrh/dsmamain.html>".

Sincerely yours

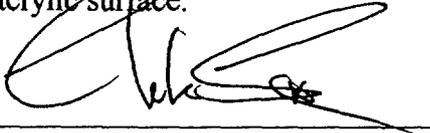


Timothy A. Ulatowski
Director
Division of Dental, Infection Control,
and General Hospital Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

STATEMENT OF INDICATIONS FOR USE

Hydro-Cast Acrylic Varnish is applied to cured materials such as dentures, partial dentures, dental splints and temporary crowns/bridges for the purpose of sealing the acrylic surface.



Clark Smith D.M.D

Prescription Use
(Per 21 CFR 801.109)



(Division Sign-Off)
Division of Dental, Infection Control,
and General Hospital Devices

510(k) Number

K991161