

JUL - 9 1999

**10. 510(k) Summary or Statement****SUMMARY**

K99450

**Gentleman:**

This submission is pursuant to paragraph 510(k) of the Federal Drug and Cosmetic Act of May, 1976 (as amended) (Title 21 USC). All informations contained herein are to be considered and treated as CONFIDENTIAL COMMERCIAL INFORMATION.

It is the intention of S & C Polymer GmbH to manufacture the ETCHING GEL cited above which can be used as an etching material for dental use.

S & C Polymer specializes in manufacturing, distributing and marketing numerous dental materials and related items worldwide.

It is S & C Polymer GmbH's intention to manufacture the cited product herein at its facility located at Robert-Bosch-Straße 5, D-25335 Elmshorn (formerly Offenauer Weg 19, D-25335 Bokholt-Hanredder), Germany, employing Good Manufacturing Practices (GMP's) pursuant and according to Title 21 CFR. S & C Polymer GmbH is certified to DIN EN ISO 9001 / DIN EN 46001 and Medical Device Directive 93/42/EEC, annex II.

The above cited product may be offered and marketed in the United States by Pharmex and Henry Schein, in which case S & C Polymer will maintain control and govern the production and primary packaging. Pharmex and Henry Schein will maintain the claims, labels, instructions and indications by themselves which are consistent with this submission and final FDA 510(k) clearance to market by Pharmex and Henry Schein.

The cited ETCHING GEL S & C Polymer GmbH manufactures for Pharmex and Henry Schein contains Pharmex and Henry Schein and chemistry commonly found in current dental materials.

The purpose of this material for use by the dentist is to clinically reline dentures. The material is in general placed against an applied adhesive system on the protheses.

The chemical composition and use of ETCHING GEL is substantially equivalent to "ETCH GEL", a product manufactured and marketed as an own brand by HENRY SCHEIN. S & C Polymer GmbH's and HENRY SCHEIN's intended use, performance, indications, proposed labels and instructions for use (see attached) are substantially similar to the predicted device (see attached).

Respectfully submitted

Jürgen Engelbrecht, Ph. D.  
Regulatory Compliance Officer



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

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Jurgen Engelbrecht, Ph.D.  
President  
Regulatory Compliance Officer  
Silicon-und Composite Spezialitäten GmbH  
Robert-Bosch-Strasse 5  
Elmshorn  
GERMANY

Re: K991450  
Trade Name: ETCHING GEL  
Regulatory Class: II  
Product Code: EBF  
Dated: April 1, 1999  
Received: April 26, 1999

Dear Dr. Engelbrecht:

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 (Pre-market 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.

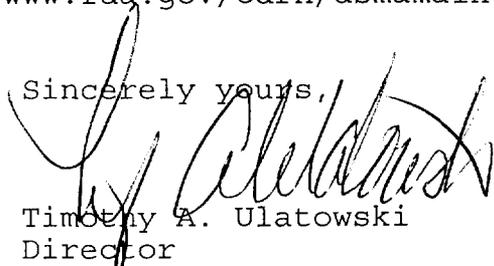
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Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

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

510(k) Number (if known): K991450

Device Name: ETCHING GEL

Indications For Use: For etching dentin and enamel.

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE  
NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use   
(Per 21 CFR 801.109)

OR

Over-The-Counter Use

(Optional Form)

Susan Demore  
(Division Sign-Off)  
Division of Dental, Infection Control,  
and General Hospital Devices  
510(k) Number K991450