

## 510(k) Summary

JUL 23 2008

### Submitter of the Application

Name: Gorbec Pharmaceutical Services Inc.  
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Durham, NC 27713  
Contact Person: Sandra R. Kircus  
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### Trade Name

Zenieva

### Common name

Hydrogel wound dressing

### Device Classification

21 CFR 878.4022 "Dressing, Wound, Hydrogel"  
Class I Non-Exempt, NAE.

### Substantial Equivalence / Predicate Device

Gorbec Pharmaceutical Services Inc. believes that Zenieva is substantially equivalent to the currently marketed device, MimyX™ cream, cleared under K041342.

### Device Description and Design

Zenieva is a non-sterile, semi-viscous emulsion intended for topical application. It is presented for prescription (requires a physician diagnosis of disease state) use. The product is formulated as an oil-in-water emulsion containing a cross-linked polyacrylic acid polymer, natural gum, and cellulose as thickening agents. The oil composition of Zenieva is composed of glyceride, squalane, lecithin, and fatty acids.

**Intended Use of the Device**

Zenieva is used to manage and relieve the burning and itching experienced with various types of dermatoses, including radiation dermatitis, atopic dermatitis, and allergic contact dermatitis. Zenieva helps relieve dry waxy skin by maintaining a moist wound and skin environment, which is beneficial to the healing process.

The indication for our proposed device is identical to the MimyX™, therefore there is no issue with determining differences in the safety and efficacy as related to the predicate device.

**Technological Comparison to Device Predicate Device**

As indicated in the following table, Zenieva has the chemical composition, intended indications for use, physical properties, and claims as the predicate (MimyX™ cream):

<b>Product name</b>	<b>Zenieva</b>	<b>MimyX™</b>
Ingredients	Purified water, olive oil, glycerin, pentylene glycol, palm glycerides, vegetable oil, hydrogenated lecithin, squalane, betaine, palmitamide MEA, sarcosine, acetamide MEA, hydroxyethyl cellulose, sodium carbomer, carbomer, xanthan gum	Purified water, olive oil, glycerin, pentylene glycol, palm glycerides, vegetable oil, hydrogenated lecithin, squalane, betaine, palmitamide MEA, sarcosine, acetamide MEA, hydroxyethyl cellulose, sodium carbomer, carbomer, xanthan gum
# of application per day	3 times per day or as needed	3 times per day or as needed
Claim	Zenieva is used to manage and relieve the burning and itching experienced with various types of dermatoses, including radiation dermatitis, atopic dermatitis, and allergic contact dermatitis. Zenieva helps relieve dry waxy skin by maintaining a moist wound and skin environment, which is beneficial to the healing process.	MimyX™ is used to manage and relieve the burning and itching experienced with various types of dermatoses, including radiation dermatitis, atopic dermatitis, and allergic contact dermatitis. MimyX™ helps relieve dry waxy skin by maintaining a moist wound and skin environment, which is beneficial to the healing process.
Product Description	Water-based emulsion	Water-based emulsion
Physical properties	Non-sterile white to off white thick cream	Non-sterile white to off white thick cream

### **Non-Clinical Performance Data**

Three applicable nonclinical tests were used to support substantial equivalence: in vitro cytotoxicity, skin sensitization, and primary skin irritation testing. Zenieva was tested as a “surface device” with limited contact duration (24 hours) on breached surfaces. Zenieva was shown to be non-toxic, a non-sensitizer, and a non-irritant (data in original 510(k) submission Section 15 and Appendices A-C, submitted 07 Nov 07, K073246). Acute system toxicity was also performed; however, this test was deemed not applicable, as the products are meant for topical applications, not for the purposes of injection (see original application).

The non-clinical performance data have shown no significant differences between the two products. This data supports our product’s substantial equivalence to the predicate device.

### **Conclusion**

We have designed our product with identical ingredients and performance characteristics as the predicate, Mimyx™. Nonclinical tests showed the product was both equivalent to the predicate and a non-irritant, non-sensitizer, and non-irritant. Release specifications have been determined such that the product’s criteria are both equivalent to the predicate and meet the device specifications for which we are claiming on the labeling. We have also included microbial limit testing to ensure the product as acceptable bioburden levels throughout the shelf-life of the product because the product is non-sterile. As such, we have put the appropriate measures in place to ensure the product is safe, effective and performs as well as the predicate device.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

**JUL 23 2008**

Gorbec Pharmaceutical Services, Inc.  
% Sandra R. Kircus, Ph.D.  
Regulatory Affairs Manager  
2445 South Alston Avenue  
Durham, North Carolina 27713

Re: K073246

Trade/Device Name: Zenieva  
Regulation Number: 21 CFR 878.4022  
Regulation Name: Hydrogel wound dressing and burn dressing  
Regulatory Class: I  
Product Code: NAE  
Dated: July 1, 2008  
Received: July 2, 2008

Dear Dr. Kircus:

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. 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 (PMA), 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 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); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 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), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,



Mark N. Melkerson  
Director  
Division of General, Restorative  
and Neurological Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure



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### Indications for Use

510(k) Number (if known): K073246  
Device Name: Zenieva

Zenieva is used to manage and relieve the burning and itching experienced with various types of dermatoses, including radiation dermatitis, atopic dermatitis, and allergic contact dermatitis. Zenieva helps relieve dry waxy skin by maintaining a moist wound and skin environment, which is beneficial to the healing process.

Prescription Use  X   
(Part 21 CFR 801 subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 801 Subpart C)

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

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Concurrence of CDRH, Office of Device Evaluation (ODE)

(Division Sign-Off)  
Division of General, Restorative,  
and Neurological Devices

510(k) Number  K073246