



Food and Drug Administration
10903 New Hampshire Avenue
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Silver Spring, MD 20993-0002

February 25, 2015

Essential Dental Systems, Inc
Mr. Jeffrey Wan
Research and Development Manager
89 Leuning Street, Suite 8
South Hackensack, NJ 07606

Re: K150020
Trade/Device Name: Irritrol™
Regulation Name: Cleanser, Root Canal
Regulatory Class: Unclassified
Product Code: KJJ
Dated: December 22, 2014
Received: January 06, 2015

Dear Mr. Wan:

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. 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); 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.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

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 (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

 Tina
Kiang -S

for Erin I. Keith, M.S.
Director
Division of Anesthesiology, General Hospital,
Respiratory, Infection Control and
Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Section 4 - Indications for Use

510(k) Number K150020

Device Name: Irritrol™

Indications for Use:

Irritrol™ is intended to cleanse and disinfect root canal systems after endodontic instrumentation.

Prescription Use X
(Per 21 CFR 801 Subpart D)

OR

Over the Counter Use
(Per 21 CFR 807 Subpart C)

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

K150020

Section 5 - 510(k) Summary

This summary of the 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR 807.92.

1. Submitter's Identification:

Essential Dental Systems
89 Leuning Street
South Hackensack, NJ 07606

Date Summary Prepared: December 22, 2014

Date Summary Revised: February 11, 2015

Contact: Mr. Jeffrey Wan

Contact Email: jwan@edsdental.com

Contact Phone #: 201-487-9090 ext. 118

Contact Fax #: 201-487-5120

2. Name of the Device:

Trade name: Irritrol™

Common name: Cleanser, Root Canal

CFR Number: N/A

Device class: Unclassified

Product Code: KJJ

3. Predicate Device Information:

1. QMix™ 2in1 Endodontic Irrigating Solution, Dentsply International, K103244

4. Device Description:

Irritrol™ is an aqueous solution for use during the irrigation phase of endodontic root canal preparation procedures. This multi-purpose device disinfects the root canal, flushes out any loosened debris, and removes the smear layer produced from root canal instrumentation.

5. Intended Use:

Irritrol™ is intended to cleanse and disinfect root canal systems after endodontic instrumentation.

6. Comparison to Predicate Devices:

A comparison of Irritrol™ and the 510(k) cleared QMix™ 2in1 Endodontic Irrigating Solution indicates the following similarities and differences to the device which received 510(k) clearance:

Irritrol™ is similar to the predicate device QMix™ 2in1 Endodontic Irrigating Solution in that they are both aqueous solutions intended as endodontic irrigants to cleanse and disinfect root canal systems. Two active ingredients contained in the proposed device are also found in the predicate device.

Irritrol™ is different from the predicate device QMix™ 2in1 Endodontic Irrigating Solution in the secondary components in their respective formulations.

All of the components found in the predicate devices have been used in legally marketed devices and were found safe for dental use. We believe that prior use of components in legally marketed devices, the performance and biocompatibility data provided support the safety and effectiveness of Irritrol™ for the indicated uses.

	Proposed Device	Predicate Device
510(k)	K150020	K103244
Device Name	Irritrol™	QMix™ 2in1 Endodontic Irrigating Solution
Manufacturer	Essential Dental Systems	Dentsply International
Intended Use	Cleanses and disinfects root canal systems	Cleanses and disinfects the root canal system
Physical Properties	Clear, green, odorless liquid solution	Clear, colorless, odorless liquid solution
pH	Slightly basic solution	Slightly basic solution
Shelf Life	2 years	2 years

7. Discussion of Non-Clinical Tests Performed for Determination of Substantial Equivalence are as Follows:

Biocompatibility testing, *in vitro* antimicrobial testing, and smear layer removal testing were conducted to determine equivalence of Irritrol™ to the predicate device QMix™ 2in1 Endodontic Irrigating Solution.

The results of five biocompatibility tests according to ISO 10993 demonstrate equivalence in safety to the predicate device.

The results of comparative *in vitro* antimicrobial testing between Irritrol™ and QMix™ demonstrate equivalence in their ability to suppress the growth of *Enterococcus faecalis*.

The results of comparative smear layer removal testing between Irritrol™ and QMix™ demonstrate equivalence in their ability to remove smear layer from instrumented root canals.

8. Discussion of Clinical Tests Performed:

Not Applicable

9. Conclusions:

Irritrol™ is substantially equivalent to the currently cleared and marketed QMix™ 2in1 Endodontic Irrigating Solution.