



March 27, 2024

Ever Growth (Vietnam) Corporation Limited
Deng Elizabeth
U.S. Agent
Long Khanh Industrial Zone,
Binh Loc Commune,
Long Khanh City, Dong Nai 76461
Vietnam

Re: K234097

Trade/Device Name: Disposable Powder Free Nitrile Examination Glove, Natural Blue Color, Tested for Use with Chemotherapy Drugs and Fentanyl Citrate
Regulation Number: 21 CFR 880.6250
Regulation Name: Non-Powdered Patient Examination Glove
Regulatory Class: Class I, reserved
Product Code: LZA, LZC, OPJ, QDO
Dated: December 1, 2023
Received: December 26, 2023

Dear Deng Elizabeth:

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 (the 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 available at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> 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 Federal Register.

Additional information about changes that may require a new premarket notification are provided in the FDA guidance documents entitled "Deciding When to Submit a 510(k) for a Change to an Existing Device" (<https://www.fda.gov/media/99812/download>) and "Deciding When to Submit a 510(k) for a Software Change to an Existing Device" (<https://www.fda.gov/media/99785/download>).

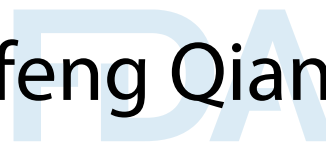
Your device is also subject to, among other requirements, the Quality System (QS) regulation (21 CFR Part 820), which includes, but is not limited to, 21 CFR 820.30, Design controls; 21 CFR 820.90, Nonconforming product; and 21 CFR 820.100, Corrective and preventive action. Please note that regardless of whether a change requires premarket review, the QS regulation requires device manufacturers to review and approve changes to device design and production (21 CFR 820.30 and 21 CFR 820.70) and document changes and approvals in the device master record (21 CFR 820.181).

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 Part 803) for devices or postmarketing safety reporting (21 CFR Part 4, Subpart B) for combination products (see <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>); 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 Part 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR Parts 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance>) and CDRH Learn (<https://www.fda.gov/training-and-continuing-education/cdrh-learn>). 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 (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice>) 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 -S

Bifeng Qian, M.D, Ph.D.
Assistant Director
DHT4B: Division of Infection Control
and Plastic and Reconstructive Surgery Devices
OHT4: Office of Surgical
and Infection Control Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K234097

Device Name

Disposable Powder Free Nitrile Examination Glove, Natural Blue Color, Tested for Use with Chemotherapy Drugs and Fentanyl Citrate

Indications for Use (Describe)

A non-powdered patient examination glove is a disposable device intended for medical purposes that is worn on the examiner's hand or finger to prevent contamination between patient and examiner. In addition, these gloves were tested respectively for use with chemotherapy drugs and Fentanyl citrate in accordance with ASTM D6978-05 Standard Practice for Assessment of Medical Gloves to Permeation by Chemotherapy Drugs.

No. Test Chemotherapy Drug and Concentration Minimum Breakthrough Detection Time (Min.)*

1	Bleomycin Sulfate 15.0 mg/ml	> 240
2	Busulfan 6.0 mg/ml	> 240
3	Carboplatin 10.0 mg/ml	> 240
4	Carmustine (BCNU) 3.3 mg/ml	59.4
5	Chloroquine 50.0 mg/ml	> 240
6	Cisplatin 1 mg/ml	> 240
7	Cyclophosphamide 20 mg/ml	> 240
8	Cyclosporin A 100.0 mg/ml	> 240
9	Cytarabine 100.0 mg/ml	> 240
10	Dacarbazine (DTIC), 10.0 mg/ml	> 240
11	Daunorubicin 5.0 mg/ml	> 240
12	Docetaxel 10.0 mg/ml	> 240
13	Doxorubicin Hydrochloride 2.0 mg/ml	> 240
14	Epirubicin 2.0 mg/ml	> 240
15	Etoposide (Toposar) 20.0 mg/ml	> 240
16	Fludarabine 25.0 mg/ml	> 240
17	Fluorouracil 50.0 mg/ml	> 240
18	Gemcitabine 38.0 mg/ml	> 240
19	Idarubicin 1.0 mg/ml	> 240
20	Ifosfamide 50.0 mg/ml	> 240
21	Irinotecan 20.0 mg/ml	> 240
22	Mechlorethamine HCl 1.0 mg/ml	> 240
23	Melphalan 5.0 mg/ml	> 240
24	Methotrexate 25 mg/ml	> 240
25	Mitomycin C 0.5 mg/ml	> 240
26	Mitoxantrone 2.0 mg/ml	> 240
27	Oxaliplatin 2.0 mg/ml	> 240
28	Paclitaxel (Taxol), 6.0 mg/ml	> 240
29	Paraplatin 10 mg/ml	> 240
30	Retrovir 10 mg/ml	> 240
31	Rituximab 10 mg/ml	> 240
32	Thiotepa, 10.0 mg/ml	118.5
33	Topotecan HCl 1.0 mg/ml	> 240
34	Trisonex 1.0 mg/ml	> 240
35	Velcade (Bortezomib) 1.0 mg/ml	> 240
36	Vincristine 1.0 mg/ml	> 240

Fentanyl Citrate Test

Fentanyl Citrate Injection 100 mcg/2ml

>240

Thiotepa and Carmustine have low permeation times

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)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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510(k) SUMMARY

K234097

0.0 Summary Preparation Date: March 23, 2024

1.0 Submitter:

Submitter's name: EVER GROWTH (VIETNAM) CORPORATION
LIMITED
Submitter's address: Long Khanh Industrial Zone, Binh Loc Commune, Long
Khanh City, Dong Nai, VN 76461
Phone number: 84-61-3514022
Fax number: 84-61-3514023
Name of contact person: Jerry Lin

2.0 US Agent:

US Representative Name: Elizabeth Deng
Company Address: 5748 Eaglewood Place
Rancho Cucamonga, California
Rancho Cucamonga, CA 91739
Telephone Number: 909 4659188
Contact Email Address: baxianunited48@yahoo.com

3.0 Name of the Device

Proprietary/Trade name: Disposable Powder Free Nitrile Examination Glove,
Natural Blue Color, Tested for Use with Chemotherapy
Drugs and Fentanyl Citrate
Common Name: Nitrile Examination Gloves, Tested for Use with
Chemotherapy Drugs and Fentanyl Citrate
Classification Name: Non-powdered Patient Examination Glove
Device Classification: Class I
Regulation Number: 21 CFR 880.6250
Product Code: LZA, LZC, OPJ, QDO

4.0 Predicate device

Device Name: Disposable Powder Free Nitrile Examination Glove,
Blue Color, Tested for Use with Chemotherapy Drugs
Company name: EVER GROWTH (VIETNAM) CORPORATION
LIMITED
510(K) Number: K190736

510(k) SUMMARY

5.0 Device Description:

This device, Disposable Powder Free Nitrile Examination Glove, Natural Blue Color, Tested for Use with Chemotherapy Drugs and Fentanyl Citrate, is a nitrile non-sterile medical examination glove available in various sizes (from extra-small to extra-large) and packaging configuration. The gloves are non-sterile medical examination gloves, seamless, ambidextrous, five fingered. They are made from proprietary formulations composed of NBR (Nitrile Butadiene Rubber), accelerator, bulking agent, and pigment. In addition, no former release powder or chemical is used in its manufacturing process.

6.0 Device Indications for use:

A non-powdered patient examination glove is a disposable device intended for medical purposes that is worn on the examiner's hand or finger to prevent contamination between patient and examiner. In addition, these gloves were tested respectively for use with chemotherapy drugs and Fentanyl citrate in accordance with ASTM D6978-05 Standard Practice for Assessment of Medical Gloves to Permeation by

No.	Test Chemotherapy Drug and Concentration	Minimum Breakthrough Detection Time (Min.)*
1	Bleomycin Sulfate 15.0 mg/ml	> 240
2	Busulfan 6.0 mg/ml	> 240
3	Carboplatin 10.0 mg/ml	> 240
4	Carmustine (BCNU) 3.3 mg/ml	59.4
5	Chloroquine 50.0 mg/ml	> 240
6	Cisplatin 1 mg/ml	> 240
7	Cyclophosphamide 20 mg/ml	> 240
8	Cyclosporin A 100.0 mg/ml	> 240
9	Cytarabine 100.0 mg/ml	> 240
10	Dacarbazine (DTIC), 10.0 mg/ml	> 240
11	Daunorubicin 5.0 mg/ml	> 240
12	Docetaxel 10.0 mg/ml	> 240
13	Doxorubicin Hydrochloride 2.0 mg/ml	> 240
14	Epirubicin 2.0 mg/ml	> 240
15	Etoposide (Toposar), 20.0 mg/ml	> 240
16	Fludarabine 25.0 mg/ml	> 240
17	Fluorouracil 50.0 mg/ml	> 240
18	Gemcitabine 38.0 mg/ml	> 240

510(k) SUMMARY

No.	Test Chemotherapy Drug and Concentration	Minimum Breakthrough Detection Time (Min.)*
19	Idarubicin 1.0 mg/ml	> 240
20	Ifosfamide 50.0 mg/ml	> 240
21	Irinotecan 20.0 mg/ml	> 240
22	Mechlorethamine HCl 1.0 mg/ml	> 240
23	Melphalan 5.0 mg/ml	> 240
24	Methotrexate 25 mg/ml	> 240
25	Mitomycin C 0.5 mg/ml	> 240
26	Mitoxantrone 2.0 mg/ml	> 240
27	Oxaliplatin 2.0 mg/ml	> 240
28	Paclitaxel (Taxol) 6.0 mg/ml	> 240
29	Paraplatin 10 mg/ml	> 240
30	Retrovir 10 mg/ml	> 240
31	Rituximab 10 mg/ml	> 240
32	Thiotepa 10.0 mg/ml	118.5
33	Topotecan HCl 1.0 mg/ml	> 240
34	Trisonex 1.0 mg/ml	> 240
35	Velcade (Bortezomib) 1.0 mg/ml	> 240
36	Vincristine 1.0 mg/ml	> 240
Fentanyl Citrate Test		
	Fentanyl Citrate Injection 100 mcg/2ml	>240

*The maximum testing time is 240 minutes

Please note that the following drug has an extremely low permeation time:

No.	Test Chemotherapy Drug and Concentration	Minimum Breakthrough Detection Time (Min.)
4	Carmustine (BCNU) 3.3 mg/ml	59.4
32	Thiotepa, 10.0 mg/ml	118.5

510(k) SUMMARY

7.0 Comparison of device technological characteristics:

Device Characteristic	Predicate Device	Subject Device	Comparison
Product Name	Disposable Powder Free Nitrile Examination Glove, Blue Color, Tested for Use with Chemotherapy Drugs	Disposable Powder Free Nitrile Examination Glove, Natural Blue Color, Tested for Use with Chemotherapy Drugs and Fentanyl Citrate	same except color
510(K) No.	K190736	K234097	n/a
Product Owner	Ever Growth (Vietnam) Corporation Limited	Ever Growth (Vietnam) Corporation Limited	same
Product Code	LZA & LZC	LZA & LZC, OPJ, QDO	same
Regulation	21 CFR 880.6250	21 CFR 880.6250	same
Class	I	I	same
Indications for Use	A patient examination gloves is a disposable device intended for medical purpose that is worn on the examiner's hand or fingers to prevent contamination between patient and examiner. In addition, these gloves were tested for use with chemotherapy drugs in accordance with ASTM D6978-05 Standard Practice for Assessment of Medical gloves to Permeation by Chemotherapy Drugs.	A patient examination gloves is a disposable device intended for medical purpose that is worn on the examiner's hand or fingers to prevent contamination between patient and examiner. In addition, these gloves were tested for use with chemotherapy drugs and Fentanyl citrate in accordance with ASTM D6978-05 Standard Practice for Assessment of Medical gloves to Permeation by Chemotherapy Drugs.	similar
Power free	Yes	Yes	same
Size	XS/S/M/L/XL	XS/S/M/L/XL	same
Over-The-Counter Use	Yes (21 CFR 801 Subpart C)	Yes (21 CFR 801 Subpart C)	same
Single Use	YES	YES	same
Non-Sterile	YES	YES	same
Dimensions- Length	Complies with ASTM D6319-10 ≥ 230 mm	Complies with ASTM D6319-19 XS&S ≥ 220 mm; M&L&XL ≥ 230 mm	similar
Dimensions - Palm Width	Complies with ASTM D6319-10 XS: 70 ± 10 mm; S: 80 ± 10 mm; M: 95 ± 10 mm; L: 110 ± 10 mm; XL: 120 ± 10 mm	Complies with ASTM D6319-19 XS: 70 ± 10 mm; S: 80 ± 10 mm; M: 95 ± 10 mm; L: 110 ± 10 mm; XL: 120 ± 10 mm	same
Dimensions - Thickness	Complies with ASTM D6319-10 Palm ≥ 0.05 mm; Finger ≥ 0.05 mm	Complies with ASTM D6319-19 Palm ≥ 0.05 mm; Finger ≥ 0.05 mm	same

510(k) SUMMARY

Device Characteristic	Predicate Device			Subject Device			Comparison
Physical Properties	Complies with ASTM D6319-10 Tensile Strength Before aging ≥ 14 MPa After aging ≥ 14 MPa			Complies with ASTM D6319-19 Tensile Strength Before aging ≥ 14 MPa After aging ≥ 14 MPa			same
	Complies with ASTM D6319-10 Elongation: Before Aging: 500% min. After Aging: 400% min.			Complies with ASTM D6319-19 Elongation: Before Aging: 500% min. After Aging: 400% min.			same
Residual powder	Complies with ASTM D6319-10 < 2mg per glove			Complies with ASTM D6319-19 < 2mg per glove			same
Freedom from Holes	In accordance with ASTM D6319-10 (G-1 with AQL 2.5)			In accordance with ASTM D6319-19 (G-1 with AQL 2.5)			same
Biocompatibility	AAMI/ ANSI/ ISO 10993-5, In vitro cytotoxicity test: Passes			ISO 10993-5: 2009, In vitro cytotoxicity test: Pass			same
	AAMI/ANSI/ISO 10993-10, Skin sensitization test & Skin Irritation test: Passes			10993-10:2021, Tests for skin sensitization: Pass			same
				CPSC standards regulated under the FHSA Act set forth in 16 CFR 1500.41, Irritation/Corrosion Test: Pass			similar
Resistance of Gloves to Permeation by Chemotherapy Drugs	no.	Test Chemotherapy Drug and Concentration	Minimum Breakthrough Detection Time (Min.)	no.	Test Chemotherapy Drug and Concentration	Minimum Breakthrough Detection Time (Min.)	similar
	1	Bleomycin Sulfate 15.0 mg/ml	> 240	1	Bleomycin Sulfate 15.0 mg/ml	> 240	
	2	Busulfan 6.0 mg/ml	> 240	2	Busulfan 6.0 mg/ml	> 240	
	3	Carboplatin 10.0 mg/ml	> 240	3	Carboplatin 10.0 mg/ml	> 240	
	4	Carmustine (BCNU), 3.3 mg/ml	59.4	4	Carmustine (BCNU), 3.3 mg/ml	59.4	
	5	Chloroquine 50.0 mg/ml	> 240	5	Chloroquine 50.0 mg/ml	> 240	
	6	Cisplatin 1.0 mg/ml	> 240	6	Cisplatin 1.0 mg/ml	> 240	
	7	Cyclophosphamide 20 mg/ml	> 240	7	Cyclophosphamide 20 mg/ml	> 240	
	8	Cyclosporin A 100.0 mg/ml	> 240	8	Cyclosporin A 100.0 mg/ml	> 240	
	9	Cytarabine 100.0 mg/ml	> 240	9	Cytarabine 100.0 mg/ml	> 240	
	10	Dacarbazine (DTIC), 10.0 mg/ml	> 240	10	Dacarbazine (DTIC), 10.0 mg/ml	> 240	
	11	Daunorubicin 5.0 mg/ml	> 240	11	Daunorubicin 5.0 mg/ml	> 240	
	12	Docetaxel 10.0 mg/ml	> 240	12	Docetaxel 10.0 mg/ml	> 240	

510(k) SUMMARY

	13	Doxorubicin Hydrochloride, 2.0 mg/ml	> 240		13	Doxorubicin Hydrochloride, 2.0 mg/ml	> 240
	14	Epirubicin 2.0 mg/ml	> 240		14	Epirubicin 2.0 mg/ml	> 240
	15	Etoposide (Toposar), 20.0 mg/ml	> 240		15	Etoposide (Toposar), 20.0 mg/ml	> 240
	16	Fludarabine 25.0 mg/ml	> 240		16	Fludarabine 25.0 mg/ml	> 240
	17	Fluorouracil, 50.0 mg/ml	> 240		17	Fluorouracil, 50.0 mg/ml	> 240
	18	Gemcitabine 38.0 mg/ml	> 240		18	Gemcitabine 38.0 mg/ml	> 240
	19	Idarubicin 1.0 mg/ml	> 240		19	Idarubicin 1.0 mg/ml	> 240
	20	Ifosfamide 50.0 mg/ml	> 240		20	Ifosfamide 50.0 mg/ml	> 240
	21	Irinotecan 20.0 mg/ml	> 240		21	Irinotecan 20.0 mg/ml	> 240
	22	Mechlorethamine HCl 1.0 mg/ml	> 240		22	Mechlorethamine HCl 1.0 mg/ml	> 240
	23	Melphalan 5.0 mg/ml	> 240		23	Melphalan 5.0 mg/ml	> 240
	24	Methotrexate 25 mg/ml	> 240		24	Methotrexate 25 mg/ml	> 240
	25	Mitomycin C 0.5 mg/ml	> 240		25	Mitomycin C 0.5 mg/ml	> 240
	26	Mitoxantrone 2.0 mg/ml	> 240		26	Mitoxantrone 2.0 mg/ml	> 240
	27	Oxaliplatin 2.0 mg/ml	> 240		27	Oxaliplatin 2.0 mg/ml	> 240
	28	Paclitaxel (Taxol), 6.0 mg/ml	> 240		28	Paclitaxel (Taxol), 6.0 mg/ml	> 240
	29	Paraplatin 10 mg/ml	> 240		29	Paraplatin 10 mg/ml	> 240
	30	Retrovir 10 mg/ml	> 240		30	Retrovir 10 mg/ml	> 240
	31	Rituximab 10 mg/ml	> 240		31	Rituximab 10 mg/ml	> 240
	32	Thiotepa, 10.0 mg/ml	118.5		32	Thiotepa, 10.0 mg/ml	118.5
	33	Topotecan HCl 1.0 mg/ml	> 240		33	Topotecan HCl 1.0 mg/ml	> 240
	34	Trisonex 1.0 mg/ml	> 240		34	Trisonex 1.0 mg/ml	> 240
	35	Velcade (Bortezomib) 1.0 mg/ml	> 240		35	Velcade (Bortezomib) 1.0 mg/ml	> 240
	36	Vincristine 1.0 mg/ml	> 240		36	Vincristine 1.0 mg/ml	> 240
	37	Fentanyl Citrate Injection 100 mcg/2ml	n/a		37	Fentanyl Citrate Injection 100 mcg/2ml	>240

510(k) SUMMARY

8.0 Assessment of Non-Clinical Performance Data:

The following bench testing was conducted for the Disposable Powder Free Nitrile Examination Glove, Natural Blue Color, Tested for Use with Chemotherapy Drugs and Fentanyl Citrate.:

Test	Test Method	Purpose	Acceptance Criteria	Results
Dimension	ASTM D3767	Determine the geometrical dimension of gloves	Length: XS&S $\geq$ 220 mm; M&L&XL $\geq$ 230 mm. Thickness: Palm - 0.05 mm min. Finger - 0.05 mm min. Palm Width: X-small 70 ± 10 mm Small 85 ± 10 mm Medium 95 ± 10 mm Large 110 ± 10 mm X-Large 120 ± 10 mm	Pass
Freedom from holes (Water leak)	21 CFR 800.20. & ASTM D5151-19	Detect the holes on the gloves.	G-I/AQL 2.5	Pass
Tensile strength (Before aging/After aging)	ASTM D412-16 & ASTM D573-04	Evaluate the tensile (tenson) properties of the gloves. In addition, it also determines the influence of elevated temperature on the physical properties of gloves.	Before Aging: 14 MPa, min. After Aging: 14 MPa, min	Pass
Elongation (Before aging/After aging)	ASTM D412-16 & ASTM D573-04		Before Aging: 500% min. After Aging: 400% min.	Pass
Powder Residual	ASTM D6124-06	Determine the average powder mass found on the gloves	< 2mg per glove	Pass
Biocompatibility-cytotoxicity	ISO 10993-5:2009	determine the cytotoxicity potential of glove	No <i>in vitro</i> cytotoxic as described in ISO 10993-5	Pass
Biocompatibility-Skin Sensitization	ISO 10993-10:2021	determine the potential of glove to promote skin sensitization after repeated applications	No dermal reactions indicative of delayed contact hypersensitivity	Pass
Biocompatibility-Skin Irritation	CPSC standards regulated under the FHSA Act set forth in 16 CFR 1500.41,	determine the potential of glove to promote irritation reactions after repeated applications	Not dermal irritation reactions	Pass

510(k) SUMMARY

Test	Test Method	Purpose	Acceptance Criteria	Results
Resistance of Gloves to Permeation by Chemotherapy Drugs	ASTM D6978-05	Assessment of medical gloves to permeation by chemotherapy drugs.	The resistance of our device to permeation were challenged against 37 chemotherapy drugs and Fentanyl Citrate	Pass

9.0 Assessment of Clinical Performance Data:

Clinical data is not needed for this type of device.

10.0 Conclusion:

The conclusions drawn from the nonclinical tests demonstrate that the subject device Disposable Powder Free Nitrile Examination Glove, Natural Blue Color, Tested for Use with Chemotherapy Drugs and Fentanyl Citrate is as safe, as effective, and performs as well as or better than the legally marketed device.