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# General Hospital and Personal Use Devices Panel of the Medical Devices Advisory Committee

**surfacide**<sup>®</sup>  
UV Technology

## Manufacturer Perspective

Jeffry D. Veenhuis  
President & CEO  
Surfacide Manufacturing, Inc.

DECEMBER 2025



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## INTRODUCTION & BACKGROUND:

- 30+ years in medical device experience
- Neurosurgery/ENT/ Orthopedics
- Medtronic: Spinal & Neuro Distribution
- Insight: Intraoperative Neuromonitoring
- Surfacide Manufacturing Inc.
  - Surface disinfection
  - UV-C FDA Pre-Sub in 2017
  - DeNovo pathway
  - 510(k) pathway





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## Procedure Rooms (OR, Cath Lab, L&D, Endo Suite)



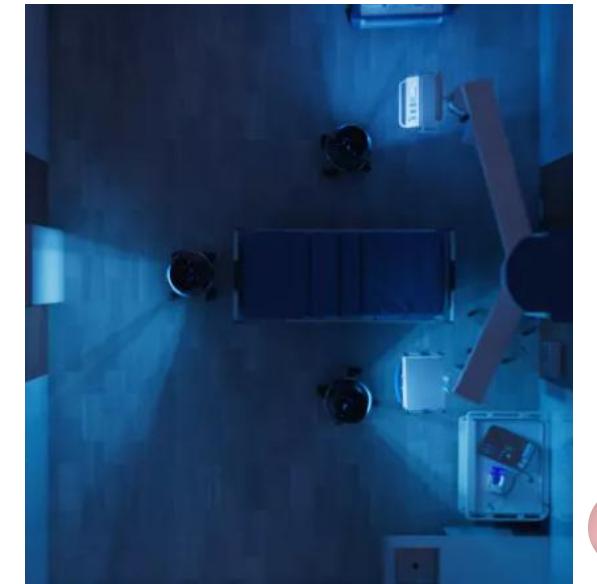
## Patient Rooms



## Patient Bathrooms



## Intensive Care Units



Helios+ is adaptable, with validated, customizable configurations.

**surfacide**<sup>®</sup>

FRA

**§ 880.6500 Medical ultraviolet air purifier.**

(a) Identification. A medical ultraviolet air purifier is a device intended for medical purposes that is used to destroy bacteria in the air by exposure to ultraviolet radiation.

(b) Classification. Class II (performance standards).



KMG

**§ 880.6710 Medical ultraviolet water purifier.**

(a) Identification. A medical ultraviolet water purifier is a device intended for medical purposes that is used to destroy bacteria in water by exposure to ultraviolet radiation.

(b) Classification. Class II (performance standards).

MKB

**§ 880.6500 Medical ultraviolet air purifier.**

(a) Identification. A medical ultraviolet air purifier is a device intended for medical purposes that is used to destroy bacteria in the air by exposure to ultraviolet radiation.

(b) Classification. Class II (performance standards).

OSZ

**§ 880.6600 Ultraviolet (UV) radiation chamber disinfection device.**

(a) Identification. An ultraviolet (UV) radiation chamber disinfection device is intended for the low-level surface disinfection of non-porous equipment surfaces by dose-controlled UV irradiation. This classification does not include self-contained open chamber UV radiation disinfection devices intended for whole room disinfection in a health care environment.

(b) Classification. Class II (special controls).

SCS

**§ 880.6511 Ultraviolet Radiation Disinfection Chamber Device.**

(a) Identification. An ultraviolet radiation disinfection chamber device is intended to disinfect patient contacting medical devices using UV radiation after the device has been cleaned. Disinfection of the medical device is achieved within an enclosed chamber through the exposure to UV radiation.

(b) Classification. Class II (special controls).

QXJ

**§ 880.6510 Whole Room Microbial Reduction Device.**

(a) Identification. A whole room microbial reduction device is a medical device to be used to reduce microbial load on medical device surfaces following cleaning and disinfection.

(b) Classification. Class II (special controls).

# WHOLE ROOM MICROBIAL REDUCTION DEVICE

Classification Product Code: QXJ

FDA identifies this generic type of device as:

**Whole room microbial reduction device.**

**A whole room microbial reduction device is a medical device to be used to reduce microbial load on medical device surfaces following cleaning and disinfection.**

U.S. Department of Health & Human Services

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**Device Classification Under Section 513(f)(2)(De Novo)**

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510(k) | DeNovo | Registration & Listing | Adverse Events | Recalls | PMA | HDE | Classification | Standards  
CFR Title 21 | Radiation-Emitting Products | X-Ray Assembler | Medsun Reports | CLIA | TPLC

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Device Classification Name	<a href="#">Whole Room Microbial Reduction Device</a>
De Novo Number	DEN230007
Device Name	LightStrike+ (MXSUV1-SL And MXSUV1-FT)
Requester	Xenex Disinfection Services, Inc. 1074 Arion Circle, Suite 116 San Antonio, TX 78254
Contact	Juan L. Gonzalez
Regulation Number	<a href="#">880.6510</a>
Classification Product Code	<a href="#">QXJ</a>
Date Received	02/01/2023
Decision Date	09/01/2023
Decision	Granted (DENG)
Classification Advisory Committee	General Hospital
Review Advisory Committee	General Hospital
Classification Order	<a href="#">Classification Order</a>
FDA Review	<a href="#">Decision Summary</a>
Type	Direct

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# 510(k) Premarket Notification

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**Device Classification Name** [Whole Room Microbial Reduction Device](#)  
**510(k) Number** K242604  
**Device Name** Helios+ UV-C System  
**Applicant** PreventaMed Technologies, Inc. Dba Surfacide Manufacturing  
W226N918 Northmound Drive, Suite 300  
Waukesha, WI 53186  
**Applicant Contact** Jeffry Veenhuis  
**Correspondent** PreventaMed Technologies, Inc. Dba Surfacide Manufacturing  
W226N918 Northmound Drive, Suite 300  
Waukesha, WI 53186  
**Correspondent Contact** Jeffry Veenhuis  
**Classification Product Code** [QXJ](#)  
**Date Received** 08/30/2024  
**Decision Date** 05/27/2025  
**Decision** Substantially Equivalent (SESE)  
**Regulation Medical Specialty** General Hospital  
**510k Review Panel** General Hospital  
**Summary** [Summary](#)  
**Type** Traditional  
**Reviewed by Third Party** No  
**Combination Product** No  
**Predetermined Change Control Plan Authorized** No

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# QXJ: Whole Room Microbial Reduction Device:

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## TPLC - Total Product Life Cycle

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CFR Title 21 | Radiation-Emitting Products | X-Ray Assembler | Medsun Reports | CLIA | TPLC

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Device	Whole Room Microbial Reduction Device		
Definition	A whole room microbial reduction device is a medical device to be used to reduce microbial load on medical device surfaces following cleaning and disinfection.		
Product Code	QXJ		
Regulation Number	880.6510		
Device Class	2		
<b>Premarket Reviews</b>			
Manufacturer	Decision		
PREVENTAMED TECHNOLOGIES, INC. DBA SURFACTIDE MANUFACTURING			
	SUBSTANTIALLY EQUIVALENT		1
XENEX DISINFECTION SERVICES, INC.			
	GRANTED		1
<b>Recalls</b>			
Manufacturer	Recall Class	Date Posted	
1   <a href="#">XENEX Disinfection Services Inc.</a>	II	Apr-23-2024	

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**SURFACTIDE**

# QXJ: Special Controls: DEN230007-S001.Letter.DENG.pdf

FDA believes that **Class II (special) controls** provide reasonable assurance of the **safety and effectiveness of the device type**. The identified risks and mitigation measures associated with the device type are summarized in the following table:

<b>Risks to Health</b>	<b>Mitigation Measures</b>
Exposure to microbiocidal agent, leading to skin and eye damage	Non-clinical performance testing Biocompatibility evaluation Software verification, validation, and hazard analysis Labeling
Respiratory mucous membrane irritation and pulmonary edema due to chemical exposure	Non-clinical performance testing Biocompatibility evaluation
Patient cross-contamination due to device failure leading to inadequate microbial reduction	Non-clinical performance testing Labeling Software verification, validation, and hazard analysis
Electrical shock	Electrical safety testing Non-clinical performance testing Labeling
Interference with other devices	Electromagnetic compatibility testing Electrical safety testing Wireless coexistence testing Labeling

# QXJ: Special Controls: DEN230007-S001.Letter.DENG.pdf

Non-clinical performance testing must demonstrate that the device performs as intended under anticipated conditions of use. The following performance characteristics must be tested:

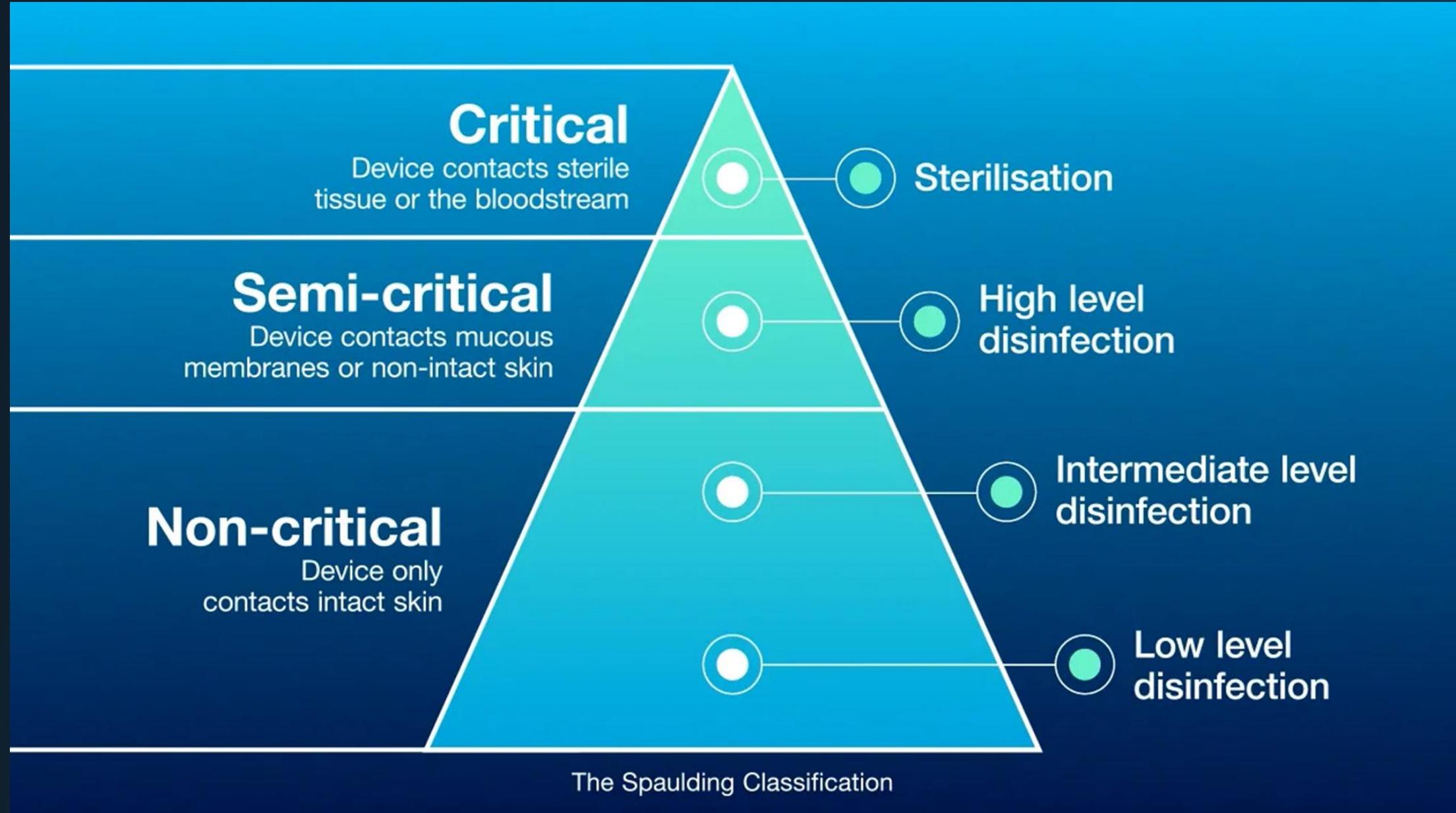
- (i) **Performance testing must demonstrate microbial log reduction** of the demonstrated most resistant microorganism on medical device surfaces commensurate with the intended level of microbial reduction;
- (ii) **Simulated use testing must evaluate device performance** under simulated worst-case use conditions (e.g., soiling, room objects and surfaces, distances);
- (iii) **In-use testing must evaluate device performance** under real-world use conditions;
- (iv) Performance testing must demonstrate the **photobiological safety** of any lamps or lamp systems;
- (v) Performance testing must evaluate **safety features intended to prevent exposure and ensure that device operation can only occur in an unoccupied environment**; and
- (vi) Performance testing must characterize the **long-term material compatibility** of the microbiocidal agent on clinically relevant surfaces and/or devices.

**Biocompatibility testing** must demonstrate safe residual levels of chemicals on medical devices surfaces and/or gaseous byproducts in air. Software verification, validation, and hazard analysis must be performed for any software components.

Performance data must demonstrate the **electromagnetic compatibility (EMC) and electrical safety** of the device.

Labeling must include:

- (i) **Warnings and instructions** to ensure the device is operated in an unoccupied environment;
- (ii) **Setup and positioning instructions**; and
- (iii) Information regarding **material compatibility**.



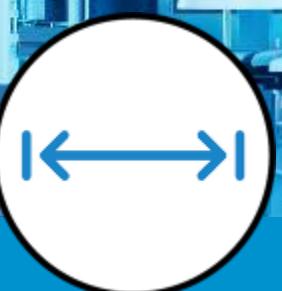
# UV-C MICROBIAL REDUCTION FACTORS:



Shadows



Time



Distance



Dose



Labor

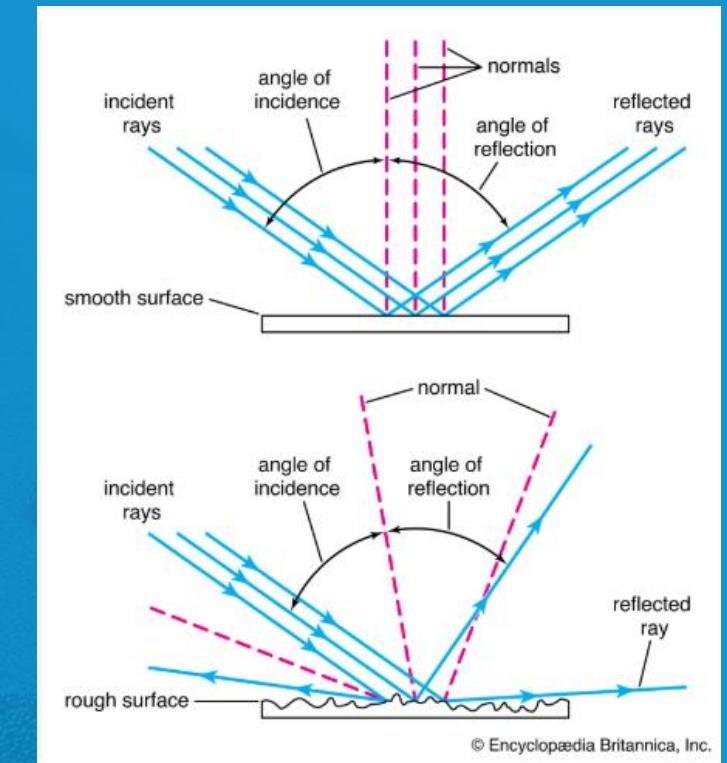
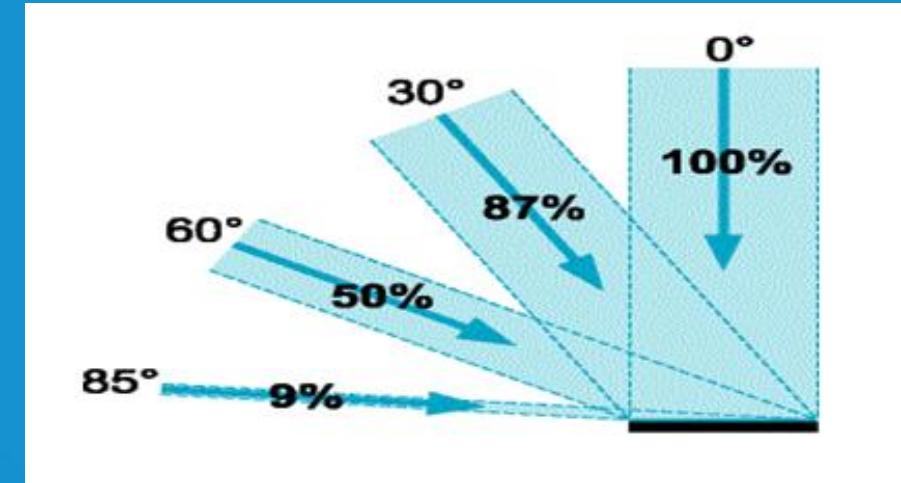
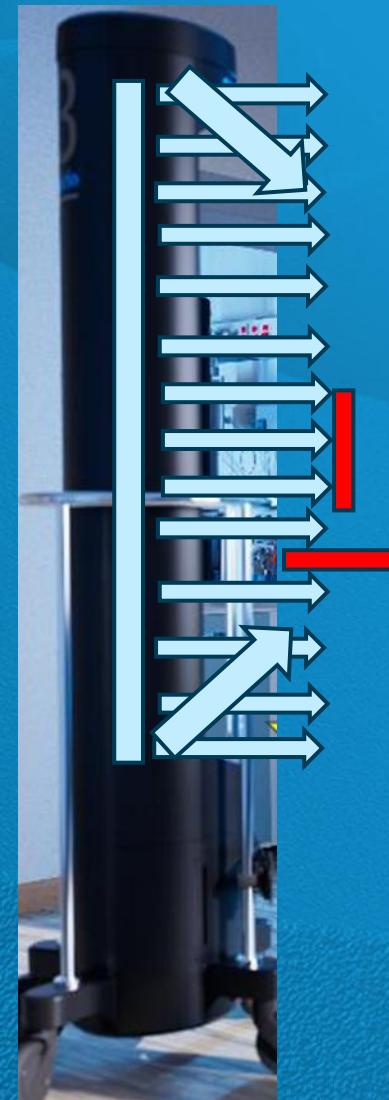
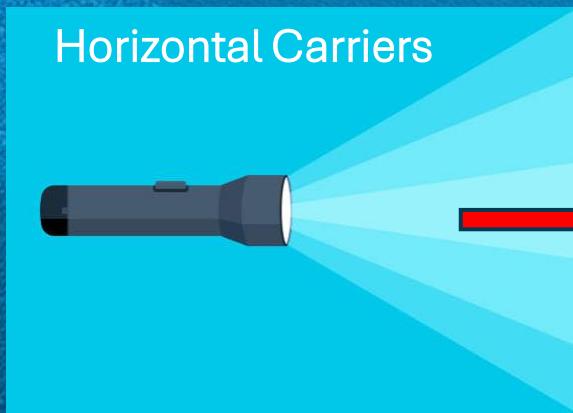
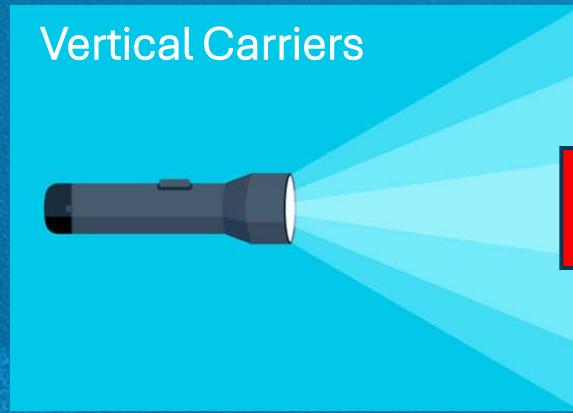


Orientation

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UV Technology

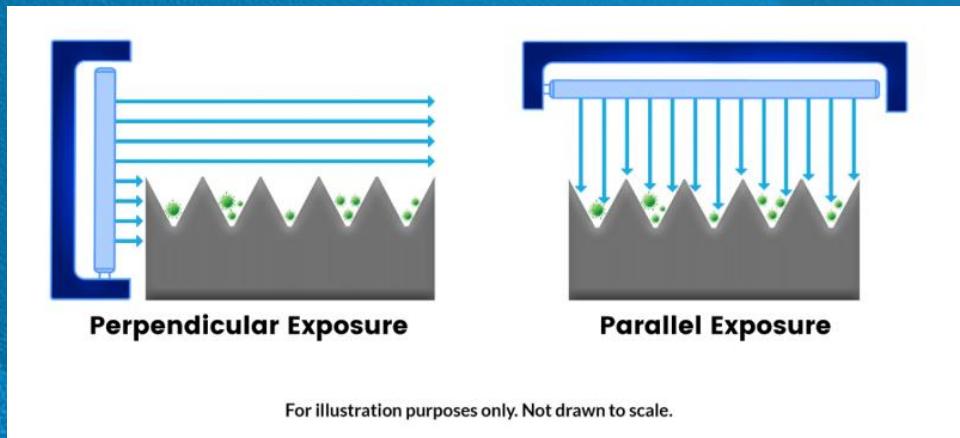
# HORIZONTAL SURFACES: LAMBERT'S COSINE LAW

## Angle of Incidence



# ORIENTATION TO SURFACES

## Angle of Incidence



- Most UVC systems are upright with vertical lamps.
- More surfaces are horizontal than vertical in healthcare.
- Almost all UVC studies are for vertical surfaces. Easier for vertical lamps.
- It takes far more time to deliver UVC dose to horizontal surfaces.

Configuration	Description	Level	Target Organisms	HORIZONTAL	
				Dose Requirement (mJ/cm <sup>2</sup> )	Vertical Dose Requirement (mJ/cm <sup>2</sup> )
2	360° General Use; 3 ft. Distance (radius) 1, 2 or 3 emitters	1	Vegetative Bacteria	300	<100
		2	<i>C. diff</i> (spore)	1300	450

**Dose in mJ/cm<sup>2</sup> Requirement:** 4-log inactivation on horizontal surfaces.

**Vegetative Bacteria:** Included: *Psudomonas aeruginosa*, *Staphylococcus aureus*, *Escherichia coli*, *Klebsiella pneumoniae* and *Enterobacter cloacae*

# UV-C MISINFORMATION:

**Steriliz**  
SMARTER LIGHT

**RD UVC**      **RD-Fx UVC**

August 2, 2024

Re: FDA information for use of UV-C equipment and systems in a hospital or healthcare facility.

To whom it may concern,

Recently, Steriliz LLC, the manufacturer of the RD Family of UV-C Disinfectors, has learned that a certain competitor began circulating false information regarding the use of UV-C disinfection equipment and systems in U.S. Hospitals and healthcare facilities. We have been told by some of our customers that their hospital was told that they could not use any UV-C equipment other than that of our competitor because the competitor has received De Novo FDA approval. And our customers were also told that the competitor represented that their pathogen reduction times have been validated by the FDA.

Please see the attached email from Steriliz to the FDA, and their response. The competitor has grossly misrepresented the facts.

According to the FDA response, if you already have ANY UV-C equipment and/or systems in your hospital, including products made by our company, you may continue to use them without violating FDA regulations. And, your hospital and healthcare organization may continue to purchase and use ANY UV-C equipment and/or systems, including products made by our company, without violating FDA regulations.

Also, please be advised that Steriliz is in the process of 510K review by the FDA. We expect to have clearance in the near future.

We hope this helps clarify the truth about using UV-C disinfection equipment and systems in your hospitals and healthcare organization.

Please feel free to contact me at any time to discuss.

Sincerely,

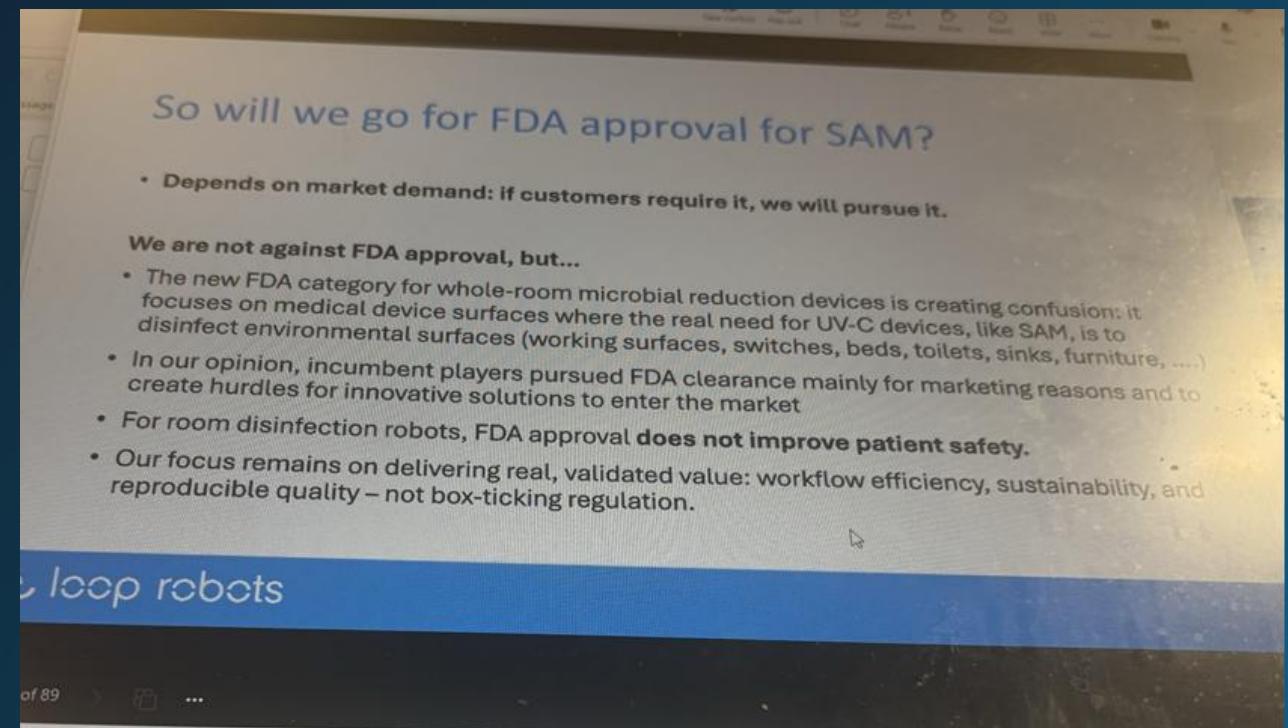
*Samuel R. Trapani*

Samuel R. Trapani  
CEO/President  
Steriliz LLC  
585-415-5411

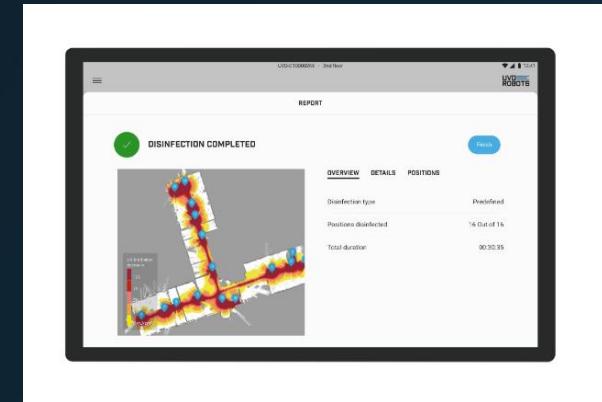
Steriliz, LLC 2580 Baird Road Penfield, NY 14526 [www.RDUVC.com](http://www.RDUVC.com)

The UV-C disinfection robot is listed with EPA as a pesticide device under EPA Est. No: 95582-DNK-1 and certified by the PMRA in accordance with section 7 of the Pest Control Products Act (PCPA) under Registration No. 34534.

Declaration Overview



# AUTONOMOUS UV-C ROBOTS:



**A1** /ADIBOT  
Fully Autonomous UV-C Disinfection Robot

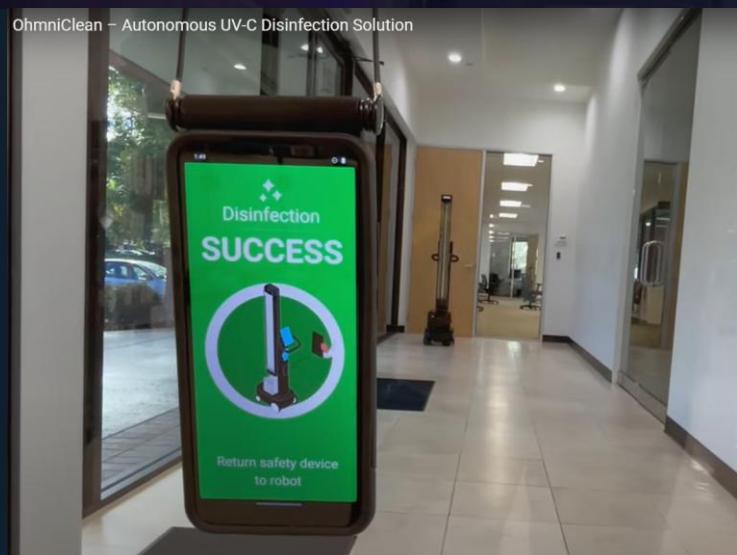
Real robots know how to move. Fully autonomous means that the A1 can navigate to disinfect surfaces without any human interaction.

LEARN MORE



## Powerful Disinfection Robot for Safer, Healthier Spaces

Elevate your UV disinfection with OhmniClean. This autonomous UV disinfection robot utilizes UV-C light to eliminate 99.99% of pathogens. Fast & effective, our UV disinfection system also yields considerable long-term costs savings.

[FIND OUT MORE](#)

“disinfection is not just enhanced...drives itself around the room...leaving no spot untouched...delivers thorough disinfection effortlessly and swiftly by completing the process two times faster than stationary devices....”

Customers Contact Us

OHMNILABS

OhmniClean ▾ OhmniCare ▾ Company ▾ Resources ▾ Demo Q

### The Autonomous Disinfection Robot Advantage

- Thorough Disinfection in Significantly Less Time**  
Not all sanitizing robots are the same. See how much time is saved by choosing an autonomous solution instead of a manual disinfection system.
- Disinfect Large Spaces in a Single Cycle**  
Due to its autonomous driving, OhmniClean can disinfect spaces both large and small with the same amount of effort from cleaning staff.
- Eliminate Shadowing & Leave Zero Missed Surfaces**  
Unlike manual emitters, OhmniClean gets up close to all sides of an object, ensuring every space is thoroughly disinfected.

# MANUFACTURER PERSPECTIVE:



## MARKET CONFUSION:

- Manufacturers: Promotion/ False Claims
- EVS: End Users: Hospitals etc.
- Performance:
  - Time:
  - Distance
  - Dose
  - Orientation
- Lack of Recognized Testing Standards



## ENFORCEMENT:

- Explicit & implicit Promotion & Misbranding: Aggressive continued promotion of unapproved devices.
- EPA Pesticide Devices: Non healthcare



## “UNCHARTERED WATERS”:

- “Whole Room”: Conflicting Terminology
- “Microbial Reduction”: an undefined term and previously unestablished log-reduction.
- Orientation/ Angle of Incidence: 3-6 x exposure time
- Microbiology: Variability and controlled parameters.

# THANK YOU

## Questions/Comments

**Jeffry D. Veenhuis**

President & CEO

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