# Normal Weight Soundblox® - Milton plant by Permacon

# **Health Product** Declaration v2.1.1

created via: HPDC Online Builder

CLASSIFICATION: 04 22 23.26

PRODUCT DESCRIPTION: This HPD covers all types of Normal Weight (NW) Soundblox® manufactured at Milton plant by Permacon (Oldcastle). This includes A1 and RSC types, ranging from 10cm to 30cm. Soundblox® masonry units are an suitable for industrial settings, gymnasiums, mechanical equipment rooms and comparable installations. Soundblox® derive their sound absorption from a simple cavity-slot resonator construction. The cavities are closed at the top and the slots, open to the sound source, allow the cavities to function as damped (Helmholtz) resonators – an excellent sound absorption tool at low frequencies. Type A-1 is designed for high moisture applications including exterior use. Type RSC Soundblox® have wider, flared slots and each cavity contains an incombustible fibrous filler with a metal septum laminated to the back side to reflect cavity slot resonator construction characteristics. Type RSC units offers a high level of absorption because of its sequential cavities molded right into the blocks. Soundblox® units are available in either concrete or lightweight units (lightweight (LW) units are not covered by this HPD) and are structural and load-bearing with equal compressive strength as comparable standard hollow masonry units. Type RSC, RSC/RF units in 20, 25 and 30 cm widths also feature straight through rear cavities which allow specification of these units in applications requiring vertical reinforcement.



# Section 1: Summary

# **Nested Method / Product Threshold**

### **CONTENT INVENTORY**

**Inventory Reporting Format** 

Nested Materials Method

C Basic Method

**Threshold Disclosed Per** 

Material

Product

Threshold level

C 100 ppm **⊙** 1,000 ppm

Per GHS SDS

Per OSHA MSDS

C Other

Residuals/Impurities

Residuals/Impurities Considered in 3 of 4 Materials

Explanation(s) provided for Residuals/Impurities?

Yes O No

All Substances Above the Threshold Indicated Are:

Characterized

% weight and role provided for all substances except SC substances characterized according to SC guidance.

Screened

Yes Ex/SC ○ Yes ○ No

All substances screened using Priority Hazard Lists with results disclosed except SC substances screened according to SC guidance.

Identified

O Yes Ex/SC O Yes O No

One or more substances not disclosed by Name (Specific or Generic) and Identifier and/ or one or more Special Condition did not follow guidance.

### CONTENT IN DESCENDING ORDER OF QUANTITY

Summary of product contents and results from screening individual chemical substances against HPD Priority Hazard Lists and the GreenScreen for Safer Chemicals®. The HPD does not assess whether using or handling this product will expose individuals to its chemical substances or any health risk. Refer to Section 2 for further details.

MATERIAL | SUBSTANCE | RESIDUAL OR IMPURITY

**GREENSCREEN SCORE | HAZARD TYPE** 

SC:GEOMAT:AGGREGATES #2 [ SC:SAND AND GRAVEL Not Screened ] CEMENTITIOUS MATERIALS #2 [ PORTLAND CEMENT LT-P1 | END | CAN BLAST FURNACE SLAG LT-UNK CALCIUM OXIDE LT-P1 QUARTZ LT-1 | CAN CHROMIUM (VI) COMPOUNDS LT-1 | CAN | DEL | REP | SKI | GEN NICKEL COMPOUNDS LT-1 | RES | CAN | WATER [ WATER BM-4 ] INSULATING MATERIAL [ MINERAL WOOL WITH FIBER DIAMETER > 6 µM LT-UNK SC:KRAFT PAPER Not Screened 3003-H14 ALUMINUM LT-P1 | RES | PHY | END CONTINUOUS FILAMENT GLASS FIBER, NON-RESPIRABLE LT-UNK UREA PHENOL FORMALDEHYDE LT-UNK CORN SUGAR SYRUP NoGS RESIDUAL OILS, PETROLEUM, SOLVENT-DEWAXED LT-1 | PBT | CAN | MUL ANTIMONY TRIOXIDE BM-1 | CAN | MUL Number of Greenscreen BM-4/BM3 contents ... 1

Contents highest concern GreenScreen Benchmark or List translator Score ... BM-1

Nanomaterial ... No

#### **INVENTORY AND SCREENING NOTES:**

Special conditions applied: GeologicalMaterial, BiologicalMaterial

[LEED v4] "Yes ex/SC" result is due only to materials and substances for which Special Conditions were applied. Thus "Yes ex/SC" does not disqualify the product for the LEED v4 Materials and Resources Disclosure and Optimization credit, Option 1.

The NW Soundblox® by Permacon (Oldcastle) has been screened at 1,000 ppm so that all intentional materials and known potential residuals and impurities present above that threshold have been reported. It is important to note that admixtures have not been reported in this HPD since they are below 1,000 ppm. The NW Soundblox® contains special condition materials, geological/biological materials, which have been reported accordingly.

# **VOLATILE ORGANIC COMPOUND (VOC) CONTENT**

VOC Content data is not applicable for this product category.

 $\textbf{CERTIFICATIONS AND COMPLIANCE} \ \ \textit{See Section 3 for additional listings}.$ 

VOC emissions: CDPH Standard Method V1.2 (Section 01350/CHPS) - Not tested

### **CONSISTENCY WITH OTHER PROGRAMS**

Pre-checked for LEED v4 Material Ingredients, Option 1

Third Party Verified?

PREPARER: Vertima

C Yes
No

VERIFIER:

VERIFICATION #:

SCREENING DATE: 2019-04-09 PUBLISHED DATE: 2019-04-09 EXPIRY DATE: 2022-04-09



# Section 2: Content in Descending Order of Quantity

This section lists contents in a product based on specific threshold(s) and reports detailed health information including hazards. This HPD uses the inventory method indicated above, which is one of three possible methods:

- Basic Inventory method with Product-level threshold.
- Nested Material Inventory method with Product-level threshold
- Nested Material Inventory method with individual Material-level thresholds

Definitions and requirements for the three inventory methods and requirements for each data field can be found in the HPD Open Standard version 2.1, available on the HPDC website at: www.hpd-collaborative.org/hpd-2-1-standard

## **SC:GEOMAT:AGGREGATES #2**

%: 90.10

PRODUCT THRESHOLD: 1000 ppm

**SC:SAND AND GRAVEL** 

RESIDUALS AND IMPURITIES CONSIDERED: Yes

BC: None NANO: No

WARNINGS

RESIDUALS AND IMPURITIES NOTES: No residuals and impurities reported by supplier besides the Special Condition Material requirements.

OTHER MATERIAL NOTES: SpecialConditionApplied:GeologicalMaterial --- Aggregates #2 consist mostly of sand and gravel.

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library HAZARD SCREENING DATE: 2019-04-09

**ROLE:** Coarse and fine aggregates

Hazard Screening not performed

gs: Not Screened

AGENCY AND LIST TITLES

SUBSTANCE NOTES:

%: 100.00

HAZARD TYPE

Version: SCGeoMats/2018-02-23

Origin: Canada, Ontario

Typical Composition: dolomitic limestone, carbonate type

Potential presence of toxic metals: One supplier reported trace amounts of toxic materials < 100 ppm.

Presence of Radioactive Elements: No knowledge about the presence of radioactive elements from quarry/pits.

Sand and gravel coming from multiple sources all from the same region.

### **CEMENTITIOUS MATERIALS #2**

%: 7.60

PRODUCT THRESHOLD: 1000 ppm

RESIDUALS AND IMPURITIES CONSIDERED: Yes

RESIDUALS AND IMPURITIES NOTES: Supplier A: No residuals and impurities reported above 1000 ppm for the component by the supplier. -/- Supplier B: Potential presence of Chromate and Nickel compounds as impurities below 1000 ppm.

other material notes: Mix of cementitious materials comprising Type HE cement and slag cement. This depicts an average composition. Ranges are introduced due to generic data for some cements.

**PORTLAND CEMENT** ID: 65997-15-1

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library HAZARD SCREENING DATE: 2019-04-09

GS: LT-P1 %: 70.40 - 78.30 BOLE: main constituent RC: None NANO: No

ID: SC:GeoMat

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
ENDOCRINE	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
CANCER	MAK	Carcinogen Group 3B - Evidence of carcinogenic effects but not sufficient for classification

SUBSTANCE NOTES: See Other Material Notes.

SUBSTANCE NOTES: See Other Material Notes.

**BLAST FURNACE SLAG** 

**CALCIUM OXIDE** 

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09			
%: <b>21.70</b>	GS: LT-UNK	RC: PreC	NANO: <b>No</b>	ROLE: ingredient	
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS			
	No hazards found				

SUBSTANCE NOTES: Blast furnace slag is 100% pre-consumer recycled content. See Other Material Notes.

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREEI	HAZARD SCREENING DATE: 2019-04-09		
%: 0.20 - 2.30	GS: LT-P1	RC: None	nano: <b>No</b>	ROLE: ingredient	
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS			
	No hazards found				

QUARTZ ID: 14808-60-7

HAZARD SCREENING METHOD: <b>F</b>	Pharos Chemical and Materials Library	HAZARD SCREEN	NING DATE: 2019-04	4-09
%: <b>0.10 - 1.20</b>	Gs: <b>LT-1</b>	RC: None	nano: <b>No</b>	ROLE: ingredient

ID: 65996-69-2

ID: 1305-78-8

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
CANCER	IARC	Group 1 - Agent is Carcinogenic to humans
CANCER	US CDC - Occupational Carcinogens	Occupational Carcinogen
CANCER	CA EPA - Prop 65	Carcinogen - specific to chemical form or exposure route
CANCER	IARC	Group 1 - Agent is carcinogenic to humans - inhaled from occupational sources
CANCER	US NIH - Report on Carcinogens	Known to be Human Carcinogen (respirable size - occupational setting)
CANCER	MAK	Carcinogen Group 1 - Substances that cause cancer in man
CANCER	New Zealand - GHS	6.7A - Known or presumed human carcinogens
CANCER	Japan - GHS	Carcinogenicity - Category 1A
CANCER	Australia - GHS	H350i - May cause cancer by inhalation

SUBSTANCE NOTES: See Other Material Notes.

CHROMIUM (VI) COMPOUNDS	ot registered
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HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09
%: Impurity/Residual	GS: <b>LT-1</b>	RC: None NANO: No ROLE: Impurity/Residual
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
CANCER	IARC	Group 1 - Agent is Carcinogenic to humans
CANCER	CA EPA - Prop 65	Carcinogen
DEVELOPMENTAL	CA EPA - Prop 65	Developmental toxicity
REPRODUCTIVE	CA EPA - Prop 65	Reproductive Toxicity - Female
REPRODUCTIVE	CA EPA - Prop 65	Reproductive Toxicity - Male
CANCER	US CDC - Occupational Carcinogens	Occupational Carcinogen
CANCER	MAK	Carcinogen Group 1 - Substances that cause cancer in man
SKIN SENSITIZE	MAK	Sensitizing Substance Sh - Danger of skin sensitization
GENE MUTATION	MAK	Germ Cell Mutagen 2

 $\hbox{\tt SUBSTANCE NOTES: } \textbf{Chromate compounds.}$ 

NICKEL COMPOUNDS ID: Not registered

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library HAZARD SCREENING DATE: 2019-04-09

%: Impurity/Residual	GS: <b>LT-1</b>	RC: None	nano: <b>No</b>	ROLE: Impurity/Residual	
HAZARD TYPE	AGENCY AND LIST TITLES	WARNIN	GS		
RESPIRATORY	AOEC - Asthmagens	Asthmagen (Rs) - sensitizer-induced			
CANCER	IARC	Group 1 - Agent is Carcinogenic to humans			
CANCER	CA EPA - Prop 65	Carcir	ogen		
CANCER	US NIH - Report on Carcinogens	Know	n to be a human	Carcinogen	

WATER %: 2.30

PRODUCT THRESHOLD: 1000 ppm

RESIDUALS AND IMPURITIES CONSIDERED: No

RESIDUALS AND IMPURITIES NOTES: No data collected regarding this material.

OTHER MATERIAL NOTES: Standard water is used (municipal)

SUBSTANCE NOTES: See Residuals and Impurities Notes.

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09		
%: 100.00	GS: <b>BM-4</b>	RC: None	nano: <b>No</b>	ROLE: hydration, binding
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS		
	No hazards found			

SUBSTANCE NOTES: See Other Material Notes.

### **INSULATING MATERIAL**

%: 0.00 - 0.11

PRODUCT THRESHOLD: 1000 ppm

RESIDUALS AND IMPURITIES CONSIDERED: Yes

RESIDUALS AND IMPURITIES NOTES: No information provided by tiers suppliers, for the glue and facing regarding the presence of residuals and impurities. The rock wool, itself, has trace amounts (<20 ppm) of formaldehyde due to the binding resin, therefore not included in the Content Inventory.

other material notes: Sound-absorbing sandwich material (facing, glue, rock wool, glue, facing). Ranges are used for 2 reasons: 1)only RSC Type Soundblox® have this sound-absorbing material, and/or 2)data provided in the form of ranges by suppliers.

### MINERAL WOOL WITH FIBER DIAMETER > $6 \mu M$

ID: 65997-17-3

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2019-04-09

\*\*: 53.50 - 54.60

GS: LT-UNK

RC: None NANO: No ROLE: mineral wool board - Main constituent

HAZARD TYPE AGENCY AND LIST TITLES WARNINGS

No hazards found

SUBSTANCE NOTES: See Other Material Notes.

SC:KRAFT PAPER ID: SC:Bio

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2	HAZARD SCREENING DATE: 2019-04-09		
%: 4.60 - 7.00	GS: Not Screened	RC: UNK NANO: No	ROLE: facing material - backing		
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS			
	Hazard Screening not performed				

SUBSTANCE NOTES:

Version: SCBioMats/2018-02-23 Category: Tree-based materials

Identifier: No indication provided for genus sp. of tree.

This disclosure does not provide information on allergens, hyper-accumulation of metals, production of any toxic substances during normal metabolic activities, pesticides, and other potential hazards or sources of hazards which may be found in certain biological materials.

CASRN 9004-34-6

3003-H14 ALUMINUM ID: 7429-90-5

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2019-04-09		
%: <b>1.20 - 3.50</b>	GS: LT-P1	RC: UNK	NANO: <b>No</b>	ROLE: facing material - skin layer	
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS		
RESPIRATORY	AOEC - Asthmagens	Asthmagen (Rs) - sensitizer-induced			
PHYSICAL HAZARD (REACTIVE)	EU - GHS (H-Statements)	H228 - Flammable solid			
PHYSICAL HAZARD (REACTIVE)	EU - GHS (H-Statements)		H250 - Catches fire spontaneously if exposed to air		
PHYSICAL HAZARD (REACTIVE)	EU - GHS (H-Statements)	H261 - In contact with water releases flammable gases			
ENDOCRINE	TEDX - Potential Endocrine Disruptors	S	Potential Endoc	rine Disruptor	

SUBSTANCE NOTES: Aluminum foil CAS [7429-90-5] reported with no indication on the type of alloy used. 3003-H14 chosen as an educated approximation for the type of application.

## **CONTINUOUS FILAMENT GLASS FIBER, NON-RESPIRABLE**

ID: **65997-17-3** 

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09		
%: <b>0.60 - 2.90</b>	gs: <b>LT-UNK</b>	RC: None	NANO: <b>No</b>	ROLE: facing material - reinforcement

HAZARD TYPE AGENCY AND LIST TITLES WARNINGS

No hazards found

SUBSTANCE NOTES: See Other Material Notes.

UREA PHENOL FORMALDEHYDE ID: 25104-55-6

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09		
%: 0.00 - 1.70	GS: LT-UNK	RC: None	NANO: <b>No</b>	ROLE: mineral wool board - binding agent
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS	
	No hazards found			

SUBSTANCE NOTES: See Other Material Notes.

CORN SUGAR SYRUP

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09		
%: <b>0.00 - 0.60</b>	GS: <b>NoGS</b>	RC: None	NANO: <b>No</b>	ROLE: mineral wool board - Binding agent
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS	
	No hazards found			

SUBSTANCE NOTES: See Other Material Notes.

# RESIDUAL OILS, PETROLEUM, SOLVENT-DEWAXED

ID: **64742-62-7** 

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09		
%: <b>0.00 - 0.10</b>	GS: <b>LT-1</b>	RC: None	NANO: No ROLE: mineral wool board - Lubricant	
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS	
РВТ	EC - CEPA DSL		Persistent, Bioaccumulative and inherently Toxic (PBiTH) humans	
CANCER	EU - GHS (H-Statements)		H350 - May cause cancer	
CANCER	EU - REACH Annex XVII CMRs		Carcinogen Category 2 - Substances which should be regarded as if they are Carcinogenic to man	
MULTIPLE	ChemSec - SIN List		CMR - Carcinogen, Mutagen &/or Reproductive Toxicant	
CANCER	EU - Annex VI CMRs		Carcinogen Category 1B - Presumed Carcinogen based o animal evidence	
CANCER	Australia - GHS		H350 - May cause cancer	

ANTIMONY TRIOXIDE ID: 1309-64-4

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2019-04-09		
%: 0.00 - 0.20	GS: <b>BM-1</b>	RC: None	nano: <b>No</b>	ROLE: facing material - flame retardant
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS	
CANCER	IARC		Group 2b - Possibly carcinogenic to humans	
CANCER	CA EPA - Prop 65		Carcinogen	
CANCER	US NIH - Report on Carcinogens		Reasonably A	Anticipated to be Human Carcinogen
CANCER	EU - GHS (H-Statements)		H351 - Suspe	ected of causing cancer
MULTIPLE	ChemSec - SIN List		CMR - Carcinogen, Mutagen &/or Reproductive Toxicant	
CANCER	MAK		Carcinogen (	Group 2 - Considered to be carcinogenic for
CANCER	Japan - GHS		Carcinogenio	city - Category 1B

 ${\tt SUBSTANCE\ NOTES:}\ \textbf{See\ Other\ Material\ Notes.}$ 



# **Section 3: Certifications and Compliance**

This section lists applicable certification and standards compliance information for VOC emissions and VOC content. Other types of health or environmental performance testing or certifications completed for the product may be provided.

#### **VOC EMISSIONS**

## CDPH Standard Method V1.2 (Section 01350/CHPS) - Not tested

CERTIFYING PARTY: Self-declared

therefore should be tested.

ISSUE DATE: 2019-

02-28

EXPIRY DATE:

CERTIFIER OR LAB: -

APPLICABLE FACILITIES: -

CERTIFICATE URL: CERTIFICATION AND COMPLIANCE NOTES: RSC Type Soundblox® include an insulating material with organic ingredients,



# **Section 4: Accessories**

This section lists related products or materials that the manufacturer requires or recommends for installation (such as adhesives or fasteners), maintenance, cleaning, or operations. For information relating to the contents of these related products, refer to their applicable Health Product Declarations, if available.

No accessories are required for this product.



# Section 5: General Notes

This HPD is only valid for normal weight Soundblox® made in Milton and therefore exclude the lightweight unit.

#### MANUFACTURER INFORMATION

MANUFACTURER: Permacon

ADDRESS: 8375 5th Side Road

Milton Ontario L9T 2X7, Canada

WEBSITE: https://permacon.ca/en/pro

CONTACT NAME: Customer Service

TITLE: -

PHONE: 905 875-4215

EMAIL: customerservicegta@permacon.ca

#### **KEY**

OSHA MSDS Occupational Safety and Health Administration Material Safety Data Sheet GHS SDS Globally Harmonized System of Classification and Labeling of Chemicals Safety Data Sheet

#### **Hazard Types**

**AQU** Aquatic toxicity

**CAN** Cancer

**DEV** Developmental toxicity **END** Endocrine activity

**EYE** Eye irritation/corrosivity

**GEN** Gene mutation

**GLO** Global warming

MAM Mammalian/systemic/organ toxicity

MUL Multiple hazards

**NEU** Neurotoxicity

**OZO** Ozone depletion

**PBT** Persistent Bioaccumulative Toxic

PHY Physical Hazard (reactive)
REP Reproductive toxicity

RES Respiratory sensitization

SKI Skin sensitization/irritation/corrosivity

**LAN** Land Toxicity

NF Not found on Priority Hazard Lists

#### GreenScreen (GS)

BM-4 Benchmark 4 (prefer-safer chemical)

BM-3 Benchmark 3 (use but still opportunity for improvement)

BM-2 Benchmark 2 (use but search for safer substitutes)

BM-1 Benchmark 1 (avoid - chemical of high concern)

BM-U Benchmark Unspecified (insuficient data to benchmark)

### **Recycled Types**

PreC Preconsumer (Post-Industrial)

PostC Postconsumer

**Both** Both Preconsumer and Postconsumer

Unk Inclusion of recycled content is unknown

None Does not include recycled content

LT-P1 List Translator Possible Benchmark 1 LT-1 List Translator Likely Benchmark 1

LT-UNK List Translator Benchmark Unknown (insufficient

information from List Translator lists to benchmark)

NoGS Unknown (no data on List Translator Lists)

## Other Terms

## **Inventory Methods:**

Nested Method / Material Threshold Substances listed within each material per threshold indicated per material Nested Method / Product Threshold Substances listed within each material per threshold indicated per product Basic Method / Product Threshold Substances listed individually per threshold indicated per product

Nano Composed of nano scale particles or nanotechnology

Third Party Verified Verification by independent certifier approved by HPDC

Preparer Third party preparer, if not self-prepared by manufacturer

Applicable facilities Manufacturing sites to which testing applies

The Health Product Declaration (HPD) Open Standard provides for the disclosure of product contents and potential associated human and environmental health hazards. Hazard associations are based on the HPD Priority Hazard Lists, the GreenScreen List Translator™, and when available, full GreenScreen® assessments. The HPD Open Standard v2.1 is not:

- a method for the assessment of exposure or risk associated with product handling or use,
- a method for assessing potential health impacts of: (i) substances used or created during the manufacturing process or (ii) substances
  created after the product is delivered for end use.

Information about life cycle, exposure and/or risk assessments performed on the product may be reported by the manufacturer in appropriate Notes sections, and/or, where applicable, in the Certifications section.

The HPD Open Standard was created and is supported by the Health Product Declaration Collaborative (the HPD Collaborative), a customer-led organization composed of stakeholders throughout the building industry that is committed to the continuous improvement of building products through transparency, openness, and innovation throughout the product supply chain.

The product manufacturer and any applicable independent verifier are solely responsible for the accuracy of statements and claims made in this HPD and for compliance with the HPD standard noted.