

HPD UNIQUE IDENTIFIER: 28696

CLASSIFICATION: 09 97 35 Dry Erase Coatings

PRODUCT DESCRIPTION: High performing BPA free Clear dry erase coating, that transcribes any surface into a creative dry erase surface.

Section 1: Summary

Nested Method / Product Threshold

CONTENT INVENTORY

Table with 4 columns: Inventory Reporting Format, Threshold Level, Residuals/Impurities, and Characterized/Screened/Identified. Includes options for reporting methods (Nested/Basic), threshold levels (100/1000 ppm), and screening results.

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®.

Number of Greenscreen BM-4/BM3 contents ... 0
Contents highest concern GreenScreen Benchmark or List translator Score ... BM-1
Nanomaterial ... No

INVENTORY AND SCREENING NOTES:

As provided and known per SDS GHS from supplier.

MATERIAL | SUBSTANCE | RESIDUAL OR IMPURITY
GREENSCREEN SCORE | HAZARD TYPE
IDEAPAIN DRY ERASE CLEAR PART A [ CYCLOHEXANOL, 4,4'-(1-METHYLETHYLIDENE)BIS-, POLYMER WITH 2-(CHLOROMETHYL)OXIRANE LT-UNK BISMUTH NEODECANOATE LT-UNK METHYL ALCOHOL BM-1 | END | DEV | MUL | REP | PHY | MAM SILOXANES AND SILICONES, DI-ME, ME VINYL, MONO(VINYL GROUP)-TERMINATED LT-UNK OCTAMETHYLCYCLOTETRA-SILOXANE BM-1 | END | MUL | PBT | REP SILOXANES AND SILICONES, DI-ME, HYDROXY-TERMINATED BM-2 POLYDIMETHYLSILOXANES (PRIMARY CASRN IS 63148-62-9) LT-P1 | PBT SILOXANES AND SILICONES, DI-ME, REACTION PRODUCTS WITH SILICA LT-UNK XYLENES BM-1 | END | MUL | REP | SKI ETHYLBENZENE BM-1 | END | SKI | CAN | RES | REP | PHY | MAM ]
IDEAPAIN DRY ERASE CLEAR PART B [ 3-(DIETHOXYMETHYLSILYL)PROPYLAMINE NoGS 3-(TRIETHOXYMETHYLSILYL)PROPYLAMINE LT-UNK | SKI SILOXANES AND SILICONES, 3-AMINOPROPYL ME, DI-PH, POLYMERS WITH PH SILSESQUIOXANES NoGS METHYL ALCOHOL BM-1 | END | DEV | MUL | REP | PHY | MAM ]

VOLATILE ORGANIC COMPOUND (VOC) CONTENT

Material (g/l): 46 Regulatory (g/l): 46
Does the product contain exempt VOCs: Yes
Are ultra-low VOC tints available: No

CERTIFICATIONS AND COMPLIANCE See Section 3 for additional listings.

VOC emissions: UL/GreenGuard Gold Certified
VOC content: EPA Method 24 - Volatile Matter Content (EPA 24)

CONSISTENCY WITH OTHER PROGRAMS

Pre-checked for LEED v4 Material Ingredients Option 1

Table with 3 columns: Third Party Verified?, PREPARER: Self-Prepared, SCREENING DATE: 2022-06-15. Includes options for verification and dates for publication and expiry.



## 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 2.2, available on the HPDC website at: [www.hpd-collaborative.org/hpd-2-2-standard](http://www.hpd-collaborative.org/hpd-2-2-standard)

### IDEAPINT DRY ERASE CLEAR PART A %: 66.0000 - 74.0000

PRODUCT THRESHOLD: 100 ppm RESIDUALS AND IMPURITIES CONSIDERED: Yes MATERIAL TYPE: Polymeric Material

RESIDUALS AND IMPURITIES NOTES: As provided and known from GHS SDS from supplier

OTHER MATERIAL NOTES: All substances in this material are below the reportable threshold.

#### CYCLOHEXANOL, 4,4'-(1-METHYLETHYLIDENE)BIS-, POLYMER WITH 2-(CHLOROMETHYL)OXIRANE

ID: 30583-72-3

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library HAZARD SCREENING DATE: 2022-06-15 14:34:50

%: 89.0000 - 98.0000 GS: LT-UNK RC: None NANO: No SUBSTANCE ROLE: Binder

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: BPA Free Chlorinated Polymer: As per GHS SDS from supplier. This material is a binder for the Part A Epoxy side of the 2 component mixture.

#### BISMUTH NEODECANOATE

ID: 34364-26-6

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library HAZARD SCREENING DATE: 2022-06-15 14:37:25

%: 2.4000 - 2.7000 GS: LT-UNK RC: None NANO: No SUBSTANCE ROLE: Catalyst

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is a catalyst for the Part A Epoxy side of the 2 component mixture.

#### METHYL ALCOHOL

ID: 67-56-1

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library HAZARD SCREENING DATE: 2022-06-15 14:36:27

%: Impurity/Residual GS: BM-1 RC: None NANO: No SUBSTANCE ROLE: Impurity/Residual

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
DEV	CA EPA - Prop 65	Developmental toxicity
DEV	US NIH - Reproductive & Developmental Monographs	Clear Evidence of Adverse Effects - Developmental Toxicity
MUL	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters
REP	GHS - Japan	H360 - May damage fertility or the unborn child [Toxic to reproduction - Category 1B]
PHY	EU - GHS (H-Statements) Annex 6 Table 3-1	H225 - Highly flammable liquid and vapour [Flammable liquids - Category 2]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H331 - Toxic if inhaled [Acute toxicity (inhalation) - Category 3]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H301 - Toxic if swallowed [Acute toxicity (oral) - Category 3]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H311 - Toxic in contact with skin [Acute toxicity (dermal) - Category 3]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H370 - Causes damage to organs [Specific target organ toxicity - single exposure - Category 1]

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is part of the binder for the Part A Epoxy side of the 2 component mixture.

**SILOXANES AND SILICONES, DI-ME, ME VINYL, MONO(VINYL GROUP)-TERMINATED**

ID: 68951-99-5

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:40:35**  
 %: **0.4400 - 0.4800** GS: **LT-UNK** RC: **None** NANO: **No** SUBSTANCE ROLE: **Surface modifier**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is a surface modifier for the Part A Epoxy side of the 2 component mixture.

**OCTAMETHYLCYCLOTETRAILOXANE**

ID: 556-67-2

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:43:29**  
 %: **0.3200 - 0.4000** GS: **BM-1** RC: **None** NANO: **No** SUBSTANCE ROLE: **Surface modifier**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
MUL	US EPA - PPT Chemical Action Plans	TSCA Work Plan chemical - Action Plan in development
END	ChemSec - SIN List	Endocrine Disruption
PBT	EU - ESIS PBT	Under PBT evaluation
PBT	OR DEQ - Priority Persistent Pollutants	Priority Persistent Pollutant - Tier 1
MUL	US EPA - PPT Chemical Action Plans	TSCA Work Plan chemical - ongoing chemical (risk) assessment
PBT	EC - CEPA DSL	Persistent, Bioaccumulative and inherently Toxic (PBITE) to the Environment (based on aquatic organisms)
PBT	EC - CEPA DSL	Persistent, Bioaccumulative and inherently Toxic (PBiTH) to humans
MUL	ChemSec - SIN List	CMR - Carcinogen, Mutagen &/or Reproductive Toxicant
MUL	German FEA - Substances Hazardous to Waters	Class 3 - Severe Hazard to Waters
END	EU - Priority Endocrine Disruptors	Category 1 - In vivo evidence of Endocrine Disruption Activity
PBT	EU - SVHC Authorisation List	PBT - Candidate list
PBT	EU - SVHC Authorisation List	vPvB - Candidate list
REP	EU - GHS (H-Statements) Annex 6 Table 3-1	H361f - Suspected of damaging fertility [Reproductive toxicity - Category 2]

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is a surface modifier for the Part A Epoxy side of the 2 component mixture.

#### SILOXANES AND SILICONES, DI-ME, HYDROXY-TERMINATED

ID: 70131-67-8

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:44:57**  
 %: **0.0600 - 0.1000** GS: **BM-2** RC: **None** NANO: **No** SUBSTANCE ROLE: **Surface modifier**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is surface modifier for the Part A Epoxy side of the 2 component mixture.

#### POLYDIMETHYLSILOXANES (PRIMARY CASRN IS 63148-62-9)

ID: 2161362-23-6

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:45:55**  
 %: **0.0300 - 0.0800** GS: **LT-P1** RC: **None** NANO: **No** SUBSTANCE ROLE: **Surface modifier**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
PBT	EC - CEPA DSL	Persistent, Bioaccumulative and inherently Toxic (PBiTH) to humans

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is surface modifier for the Part A Epoxy side of the 2 component mixture.

**SILOXANES AND SILICONES, DI-ME, REACTION PRODUCTS WITH SILICA**

ID: 67762-90-7

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:46:39**

#: **0.0300 - 0.0800** GS: **LT-UNK** RC: **None** NANO: **No** SUBSTANCE ROLE: **Surface modifier**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is surface modifier for the Part A Epoxy side of the 2 component mixture.

**XYLENES**

ID: 1330-20-7

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:41:50**

#: **Impurity/Residual** GS: **BM-1** RC: **None** NANO: **No** SUBSTANCE ROLE: **Impurity/Residual**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
MUL	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters
REP	GHS - Japan	H360 - May damage fertility or the unborn child [Toxic to reproduction - Category 1B]
SKI	EU - GHS (H-Statements) Annex 6 Table 3-1	H315 - Causes skin irritation [Skin corrosion/irritation - Category 2]

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is a residual carrier solvent as part of the binder for the Part A Epoxy side of the 2 component mixture.

**ETHYLBENZENE**

ID: 100-41-4

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:42:27**

#: **Impurity/Residual** GS: **BM-1** RC: **None** NANO: **No** SUBSTANCE ROLE: **Impurity/Residual**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
SKI	MAK	Sensitizing Substance Sh - Danger of skin sensitization
CAN	CA EPA - Prop 65	Carcinogen
CAN	MAK	Carcinogen Group 4 - Non-genotoxic carcinogen with low risk under MAK/BAT levels
CAN	IARC	Group 2b - Possibly carcinogenic to humans
RES	AOEC - Asthmagens	Asthmagen (Rs) - sensitizer-induced
REP	GHS - Japan	H360 - May damage fertility or the unborn child [Toxic to reproduction - Category 1B]
REP	GHS - Japan	H360 - May damage fertility or the unborn child [Toxic to reproduction - Category 1A]
PHY	EU - GHS (H-Statements) Annex 6 Table 3-1	H225 - Highly flammable liquid and vapour [Flammable liquids - Category 2]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H304 - May be fatal if swallowed and enters airways [Aspiration hazard - Category 1]

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is a residual carrier solvent as part of the binder for the Part A Epoxy side of the 2 component mixture.

**IDEAPAIN DRY ERASE CLEAR PART B**      %: 26.0000 - 33.0000

PRODUCT THRESHOLD: 100 ppm      RESIDUALS AND IMPURITIES CONSIDERED: Yes      MATERIAL TYPE: Polymeric Material

RESIDUALS AND IMPURITIES NOTES: As provided and known from GHS SDS from supplier

OTHER MATERIAL NOTES: All substances in this material are below the reportable threshold.

**3-(DIETHOXYMETHYLSILYL)PROPYLAMINE**

ID: 3179-76-8

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library      HAZARD SCREENING DATE: 2022-06-15 14:48:19

%: 66.0000 - 78.0000      GS: NoGS      RC: None      NANO: No      SUBSTANCE ROLE: Activator

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is an activator for the Part B Epoxy side of the 2 component mixture.

**3-(TRIETHOXYMETHYLSILYL)PROPYLAMINE**

ID: 919-30-2

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library      HAZARD SCREENING DATE: 2022-06-15 14:50:24

%: 17.0000 - 20.0000      GS: LT-UNK      RC: None      NANO: No      SUBSTANCE ROLE: Activator

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
SKI	EU - GHS (H-Statements) Annex 6 Table 3-1	H314 - Causes severe skin burns and eye damage [Skin corrosion/irritation - Category 1A or 1B or 1C]

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is an activator for the Part B Epoxy side of the 2 component mixture.

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:48:59**

#: **7.0000 - 9.0000** GS: **NoGS** RC: **None** NANO: **No** SUBSTANCE ROLE: **Activator**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is an activator for the Part B Epoxy side of the 2 component mixture.

**METHYL ALCOHOL**

ID: 67-56-1

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2022-06-15 14:49:51**

#: **Impurity/Residual** GS: **BM-1** RC: **None** NANO: **No** SUBSTANCE ROLE: **Impurity/Residual**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
DEV	CA EPA - Prop 65	Developmental toxicity
DEV	US NIH - Reproductive & Developmental Monographs	Clear Evidence of Adverse Effects - Developmental Toxicity
MUL	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters
REP	GHS - Japan	H360 - May damage fertility or the unborn child [Toxic to reproduction - Category 1B]
PHY	EU - GHS (H-Statements) Annex 6 Table 3-1	H225 - Highly flammable liquid and vapour [Flammable liquids - Category 2]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H331 - Toxic if inhaled [Acute toxicity (inhalation) - Category 3]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H301 - Toxic if swallowed [Acute toxicity (oral) - Category 3]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H311 - Toxic in contact with skin [Acute toxicity (dermal) - Category 3]
MAM	EU - GHS (H-Statements) Annex 6 Table 3-1	H370 - Causes damage to organs [Specific target organ toxicity - single exposure - Category 1]

SUBSTANCE NOTES: As per GHS SDS from supplier. This material is residual from the activator for the Part B Epoxy side of the 2 component mixture.



## 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	UL/GreenGuard Gold Certified		
CERTIFYING PARTY: Third Party	ISSUE DATE: 2022-01-07	EXPIRY DATE: 2023-01-07	CERTIFIER OR LAB: UL
APPLICABLE FACILITIES: All.			
CERTIFICATE URL:			
CERTIFICATION AND COMPLIANCE NOTES: Standard room for Dry erase walls.			

  

VOC CONTENT	EPA Method 24 - Volatile Matter Content (EPA 24)		
CERTIFYING PARTY: Third Party	ISSUE DATE: 2021-12-28	EXPIRY DATE:	CERTIFIER OR LAB: Applied Technical Services, Incorporated
APPLICABLE FACILITIES: All.			
CERTIFICATE URL:			
CERTIFICATION AND COMPLIANCE NOTES: EPA Method 24 with exempt materials.			

## 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.*

MICROFIBER ROLLER COVER	HPD URL: No HPD available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES: Instructions included with kit and on <a href="http://www.ideapaint.com">www.ideapaint.com</a>	

## Section 5: General Notes

High performing BPA FREE Clear dry erase coating, that transcribes any surface into a creative dry erase surface.

**MANUFACTURER INFORMATION**

**MANUFACTURER:** ICP Group  
**ADDRESS:** 150 Dascomb Road  
**Andover Massachusetts 01810, United States**  
**WEBSITE:** www.ideapaint.com

**CONTACT NAME:** Marty Donbrosky Jr  
**TITLE:** Technical Director  
**PHONE:** 4193445220  
**EMAIL:** mdonbrosky@icpgroup.com

*The listed contact is responsible for the validity of this HPD and attests that it is accurate and complete to the best of his or her knowledge.*

**KEY**

**Hazard Types**

<b>AQU</b> Aquatic toxicity	<b>LAN</b> Land toxicity	<b>PHY</b> Physical hazard (flammable or reactive)
<b>CAN</b> Cancer	<b>MAM</b> Mammalian/systemic/organ toxicity	<b>REP</b> Reproductive
<b>DEV</b> Developmental toxicity	<b>MUL</b> Multiple	<b>RES</b> Respiratory sensitization
<b>END</b> Endocrine activity	<b>NEU</b> Neurotoxicity	<b>SKI</b> Skin sensitization/irritation/corrosivity
<b>EYE</b> Eye irritation/corrosivity	<b>NF</b> Not found on Priority Hazard Lists	<b>UNK</b> Unknown
<b>GEN</b> Gene mutation	<b>OZO</b> Ozone depletion	
<b>GLO</b> Global warming	<b>PBT</b> Persistent, bioaccumulative, and toxic	

**GreenScreen (GS)**

<b>BM-4</b> Benchmark 4 (prefer-safer chemical)	<b>LT-1</b> List Translator 1 (Likely Benchmark-1)
<b>BM-3</b> Benchmark 3 (use but still opportunity for improvement)	<b>LT-UNK</b> List Translator Benchmark Unknown (the chemical is present on at least one GreenScreen Specified List, but the information contained within the list did not result in a clear mapping to a LT-1 or LTP1 score.)
<b>BM-2</b> Benchmark 2 (use but search for safer substitutes)	
<b>BM-1</b> Benchmark 1 (avoid - chemical of high concern)	
<b>BM-U</b> Benchmark Unspecified (due to insufficient data)	
<b>LT-P1</b> List Translator Possible 1 (Possible Benchmark-1)	<b>NoGS</b> No GreenScreen.

**Recycled Types**

**PreC** Pre-consumer recycled content  
**PostC** Post-consumer recycled content  
**UNK** Inclusion of recycled content is unknown  
**None** Does not include recycled content

**Other Terms:**

**GHS SDS** Globally Harmonized System of Classification and Labeling of Chemicals Safety Data Sheet

**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.*