

Top Mount Stainless Steel Kitchen Sinks by Elkay Manufacturing Company

Health Product Declaration v2.2

created via: HPDC Online Builder

HPD UNIQUE IDENTIFIER: 21619

CLASSIFICATION: 22 40 00 Plumbing Fixtures

PRODUCT DESCRIPTION: A top mount sink has a finished edge or rim and is installed or mounted on top of a counter. This HPD includes models with the prefixes LFR, LRAD, BCR, BPSR, CMR, CR, GEGR, PSR, STCR, CDK, PSD, GE, DXR, D, DDW, DG, DP, DW, DE, DSE, DPC, DPXSR, DRK, BLGR, BLR, DLR, DLSR, LH, LR, LSR, LTR, N, NS, NLX, NLB, NE, NBC. Optional accessories included in kits, such as faucets or drainboards, are not covered by this HPD.

Section 1: Summary

Nested Method / Product Threshold

CONTENT INVENTORY

Inventory Reporting Format

- ☒ Nested Materials Method
☐ Basic Method

Threshold Disclosed Per

- ☐ Material
☒ Product

Threshold level

- ☒ 100 ppm
☐ 1,000 ppm
☐ Per GHS SDS
☐ Other

Residuals/Impurities

Residuals/Impurities
Considered in 1 of 5 Materials

Explanation(s) provided
for Residuals/Impurities?

- ☒ Yes ☐ No

All Substances Above the Threshold Indicated Are:

Characterized ☒ Yes Ex/SC ☐ Yes ☐ No
% 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 ☒ Yes Ex/SC ☐ Yes ☐ No
All substances disclosed by Name (Specific or Generic) and Identifier except SC substances identified according to SC 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

BOWL [**STAINLESS STEEL** NoGS] **SOUND DEADENING PADS** [**BITUMENS, EXTRACTS OF STEAM-REFINED AND AIR-REFINED; STEAM-REFINED, CRACKING-RESIDUE AND AIR-REFINED BITUMENS (SEE BITUMENS, OCCUPATIONAL EXPOSURES)** LT-1 | CAN **CALCIUM CARBONATE** BM-3 **BARIUM SULFATE** BM-2 | CAN **IRON CARBONYL (FE(CO)5), (TB-5-11)-** LT-P1 | MUL | MAM **ANTIMONY OXIDE (ANTIMONY TRIOXIDE)** BM-1 | CAN | MUL **CELLULOSE** LT-UNK | RES **ACETIC ACID ETHENYL ESTER, POLYMER WITH ETHENE** LT-UNK **ETHYL ACETATE** LT-UNK | PHY | EYE **PULP, CELLULOSE** NoGS **CARBON BLACK** BM-1 | CAN] **CHANNELS** [**STEEL** NoGS **HYDROCHLORIC ACID** BM-2 | RES | MAM **ZINC** LT-P1 | AQU | PHY | END | MUL] **CLIPS** [**STEEL** NoGS **SC:PHOSPHOPHYLLITE** Not Screened] **SCREWS** [**STEEL** NoGS **SC:PHOSPHOPHYLLITE** Not Screened]

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

[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.

Material percent ranges are the result of grouping multiple products. Composition is consistent across product group. Bowls are manufactured in a wide variety of size and depth and require different sizes of sound deadening pads.

VOLATILE ORGANIC COMPOUND (VOC) CONTENT

VOC Content data is not applicable for this product category.

CERTIFICATIONS AND COMPLIANCE See Section 3 for additional listings.

VOC emissions: VOC content data is not applicable for this product category.

CONSISTENCY WITH OTHER PROGRAMS

Pre-checked for LEED v4 Material Ingredients Option 1

Third Party Verified?

☐ Yes

☒ No

PREPARER: **Self-Prepared**

VERIFIER:

VERIFICATION #:

SCREENING DATE: 2020-09-04

PUBLISHED DATE: 2020-09-04

EXPIRY DATE: 2023-09-04



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

BOWL

?: 74.7970 - 90.2480

PRODUCT THRESHOLD: 100 ppm

RESIDUALS AND IMPURITIES CONSIDERED: No

MATERIAL TYPE: Metal

RESIDUALS AND IMPURITIES NOTES: Residuals and Impurities were not considered. Composition information for stainless steel is included in substance notes.

OTHER MATERIAL NOTES:

STAINLESS STEEL

ID: 12597-68-1

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2020-09-04

?: 100.0000

GS: NoGS

RC: Both

NANO: No

SUBSTANCE ROLE: Structure component

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: The composition of stainless steel includes the following elements [CAS#: %]: Iron [7439-89-6; 45-90%], Nickel [7440-02-0; 0-40%], Chromium [7440-47-3; 10.5-30%], Manganese [7439-98-7; 0-15%], Molybdenum [7439-98-7; 0-5%], Copper [7440-50-8; 0-5%], Silicon [7440-21-3; 0-3%], Aluminum [7429-90-5; 0-1%], Cobalt [7440-48-4; 0-1%], Titanium [7440-32-6; 0-1%], Vanadium [1314-62-1; Trace], Tungsten [7440-33-7; Trace], Tantalum [7440-25-7; Trace], Lead [7439-92-1; Trace].

SOUND DEADENING PADS

?: 4.4420 - 6.2400

PRODUCT THRESHOLD: 100 ppm

RESIDUALS AND IMPURITIES CONSIDERED: Yes

MATERIAL TYPE: Geologically Derived Material

RESIDUALS AND IMPURITIES NOTES: Residuals and Impurities were considered based on process chemistry via Pharos. Potential Residuals and Impurities were present in the Ethylenevinylacetate copolymer and Ethyl Acetate. Details are in the respective substance notes.

OTHER MATERIAL NOTES:

BITUMENS, EXTRACTS OF STEAM-REFINED AND AIR-REFINED; STEAM-REFINED, CRACKING-RESIDUE AND AIR-REFINED BITUMENS (SEE BITUMENS, OCCUPATIONAL EXPOSURES)

ID: 8052-42-4

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2020-09-04

?: 35.0000

GS: LT-1

RC:
None

NANO:
No

SUBSTANCE ROLE:
Structure component

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
CANCER	IARC	Group 2b - Possibly carcinogenic to humans
CANCER	CA EPA - Prop 65	Carcinogen
CANCER	US CDC - Occupational Carcinogens	Occupational Carcinogen
CANCER	IARC	Group 2B - Possibly carcinogenic to humans - inhaled from occupational sources
CANCER	MAK	Carcinogen Group 3B - Evidence of carcinogenic effects but not sufficient for classification
SUBSTANCE NOTES:		

CALCIUM CARBONATE

ID: **471-34-1**

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2020-09-04		
%: 30.0000	GS: BM-3	RC: None	NANO: No	SUBSTANCE ROLE: Structure component
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS	
None found		No warnings found on HPD Priority Hazard Lists		
SUBSTANCE NOTES:				

BARIUM SULFATE

ID: **7727-43-7**

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2020-09-04		
%: 12.0000	GS: BM-2	RC: None	NANO: No	SUBSTANCE ROLE: Filler
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS		
CANCER	MAK	Carcinogen Group 4 - Non-genotoxic carcinogen with low risk under MAK/BAT levels		
SUBSTANCE NOTES:				

IRON CARBONYL (FE(CO)5), (TB-5-11)-

ID: **13463-40-6**

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2020-09-04		
%: 8.8000	GS: LT-P1	RC: None	NANO: No	SUBSTANCE ROLE: Plasticizer
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS		
MULTIPLE	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters		
MAMMALIAN	US EPA - EPCRA Extremely Hazardous Substances	Extremely Hazardous Substances		

SUBSTANCE NOTES:

ANTIMONY OXIDE (ANTIMONY TRIOXIDE)

ID: 1309-64-4

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**

HAZARD SCREENING DATE: **2020-09-04**

#: **5.0000** GS: **BM-1** RC: **None** NANO: **No** SUBSTANCE ROLE: **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 Anticipated to be Human Carcinogen

CANCER

EU - GHS (H-Statements)

H351 - Suspected of causing cancer

MULTIPLE

ChemSec - SIN List

CMR - Carcinogen, Mutagen &/or Reproductive Toxicant

CANCER

MAK

Carcinogen Group 2 - Considered to be carcinogenic for man

CANCER

GHS - Japan

Carcinogenicity - Category 1B [H350]

SUBSTANCE NOTES:

CELLULOSE

ID: 9004-34-6

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**

HAZARD SCREENING DATE: **2020-09-04**

#: **4.0000** GS: **LT-UNK** RC: **None** NANO: **No** SUBSTANCE ROLE: **Filler**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

RESPIRATORY

AOEC - Asthmagens

Asthmagen (Rs) - sensitizer-induced

SUBSTANCE NOTES:

ACETIC ACID ETHENYL ESTER, POLYMER WITH ETHENE

ID: 24937-78-8

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**

HAZARD SCREENING DATE: **2020-09-04**

#: **2.0000** GS: **LT-UNK** RC: **None** NANO: **No** SUBSTANCE ROLE: **Tensile strength additive**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES: Per Pharos, Hydrogen peroxide [7722-84-1; LT-UNK], Peroxydisulfuric acid, disodium salt [7775-27-1; BM-1], and Sodium formaldehyde bisulfite [870-72-4; LT-UNK] are frequent known or potential residuals in this substance. They are used as catalysts; percent weight for each is unknown.

ETHYL ACETATE

ID: 141-78-6

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2020-09-04		
%: 1.5000	GS: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Adhesive
HAZARD TYPE	AGENCY AND LIST TITLES		WARNINGS	
PHYSICAL HAZARD (REACTIVE)	EU - GHS (H-Statements)		H225 - Highly flammable liquid and vapour	
EYE IRRITATION	EU - GHS (H-Statements)		H319 - Causes serious eye irritation	
SUBSTANCE NOTES: Per Pharos, Chromium [7440-47-3; LT-P1], Cobalt [7440-48-4; LT-P1], and Sulfuric Acid [7664-93-9; LT-P1] are frequent known or potential residuals in this substance. They are used as catalysts; percent weight for each is unknown.				

PULP, CELLULOSE				ID: 65996-61-4	
HAZARD SCREENING METHOD: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2020-09-04		
%: 1.5000	GS: NoGS	RC: None	NANO: No	SUBSTANCE ROLE: Filler	
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS			
None found		No warnings found on HPD Priority Hazard Lists			
SUBSTANCE NOTES:					

CARBON BLACK			ID: 1333-86-4		
HAZARD SCREENING METHOD: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2020-09-04		
%: 0.2000	GS: BM-1	RC: None	NANO: No	SUBSTANCE ROLE: Dye	
HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS			
CANCER	US CDC - Occupational Carcinogens	Occupational Carcinogen			
CANCER	CA EPA - Prop 65	Carcinogen - specific to chemical form or exposure route			
CANCER	IARC	Group 2B - Possibly carcinogenic to humans - inhaled from occupational sources			
CANCER	MAK	Carcinogen Group 3B - Evidence of carcinogenic effects but not sufficient for classification			
SUBSTANCE NOTES:					

CHANNELS %: 4.3890 - 16.2778

PRODUCT THRESHOLD: 100 ppm	RESIDUALS AND IMPURITIES CONSIDERED: No	MATERIAL TYPE: Metal
RESIDUALS AND IMPURITIES NOTES: Residuals and Impurities were not considered. Refer to ASTM A653 for alloy specifications.		
OTHER MATERIAL NOTES:		

STEEL

ID: 12597-69-2

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2020-09-04**%: **87.0000 - 100.0000**GS: **NoGS**RC: **Both**NANO: **No**SUBSTANCE ROLE: **Structure component**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES:

HYDROCHLORIC ACID

ID: 7647-01-0

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2020-09-04**%: **0.0000 - 10.0000**GS: **BM-2**RC: **None**NANO: **No**SUBSTANCE ROLE: **Galvanizing**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

RESPIRATORY

AOEC - Asthmagens

Asthmagen (Rr) - irritant-induced

MAMMALIAN

US EPA - EPCRA Extremely Hazardous
Substances

Extremely Hazardous Substances

SUBSTANCE NOTES:

ZINC

ID: 7440-66-6

HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2020-09-04**%: **0.0000 - 3.0000**GS: **LT-P1**RC: **None**NANO: **No**SUBSTANCE ROLE: **Galvanizing**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

ACUTE AQUATIC

EU - GHS (H-Statements)

H400 - Very toxic to aquatic life

CHRON AQUATIC

EU - GHS (H-Statements)

H410 - Very toxic to aquatic life with long lasting effects

PHYSICAL HAZARD (REACTIVE)

EU - GHS (H-Statements)

H250 - Catches fire spontaneously if exposed to air

PHYSICAL HAZARD (REACTIVE)

EU - GHS (H-Statements)

H260 - In contact with water releases flammable gases
which may ignite spontaneously

ENDOCRINE

TEDX - Potential Endocrine Disruptors

Potential Endocrine Disruptor

MULTIPLE

German FEA - Substances Hazardous to
Waters

Class 2 - Hazard to Waters

SUBSTANCE NOTES:

CLIPS

%: **0.4840 - 1.2480**

RESIDUALS AND IMPURITIES NOTES: Residuals and Impurities were not considered.

OTHER MATERIAL NOTES: SpecialConditionApplied:GeologicalMaterial

STEEL

ID: 12597-69-2

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2020-09-04

%: 99.0000

GS: NoGS

RC: None

NANO: No

SUBSTANCE ROLE: Structure component

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES:

SC:PHOSPHOPHYLLITE

ID: SC:GeoMat

HAZARD SCREENING METHOD: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2020-09-04

%: 0.9000

GS: Not Screened

RC: None

NANO: No

SUBSTANCE ROLE: Plating agent

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

Hazard Screening not performed

SUBSTANCE NOTES:
Version: SCGeoMats/2019-06-20
Origin: Unknown
Typical Composition: This disclosure does not provide typical composition.
Potential presence of toxic metals: This disclosure does not provide information on the potential presence of toxic metals.
Presence of Radioactive Elements: This disclosure does not provide radioactive elements which may be found in certain geological materials.

SCREWS

%: 0.4363 - 1.2480

PRODUCT THRESHOLD: 100 ppm

RESIDUALS AND IMPURITIES CONSIDERED: No

MATERIAL TYPE: Metal

RESIDUALS AND IMPURITIES NOTES: Residuals and Impurities were not considered.

OTHER MATERIAL NOTES: SpecialConditionApplied:GeologicalMaterial

STEELID: **12597-69-2**HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2020-09-04**%: **99.0000**GS: **NoGS**RC: **None**NANO: **No**SUBSTANCE ROLE: **Structure component**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

SUBSTANCE NOTES:

SC:PHOSPHOPHYLLITEID: **SC:GeoMat**HAZARD SCREENING METHOD: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2020-09-04**%: **0.9000**GS: **Not Screened**RC: **None**NANO: **No**SUBSTANCE ROLE: **Plating agent**

HAZARD TYPE

AGENCY AND LIST TITLES

WARNINGS

Hazard Screening not performed

SUBSTANCE NOTES:

Version: **SCGeoMats/2019-06-20**Origin: **Unknown**

Typical Composition: This disclosure does not provide typical composition.

Potential presence of toxic metals: This disclosure does not provide information on the potential presence of toxic metals.

Presence of Radioactive Elements: This disclosure does not provide radioactive elements which may be found in certain geological materials.

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

VOC content data is not applicable for this product category.

CERTIFYING PARTY: **Self-declared**

ISSUE DATE: **2020-**

EXPIRY DATE:

CERTIFIER OR LAB: **NA**

APPLICABLE FACILITIES: **NA**

08-26

CERTIFICATE URL:

CERTIFICATION AND COMPLIANCE NOTES:

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

Material percent ranges are the result of grouping multiple products. Composition is consistent across product group. Bowls are manufactured in a wide variety of size and depth and require different sizes of sound deadening pads and channels.



MANUFACTURER INFORMATION

MANUFACTURER: **Elkay Manufacturing Company**
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 WEBSITE: **elkay.com**

CONTACT NAME: **Allison Carmody**
 TITLE: **Sustainability Analyst**
 PHONE: **(630) 574-8484**
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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

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

GreenScreen (GS)

BM-4 Benchmark 4 (prefer-safer chemical)	LT-1 List Translator 1 (Likely Benchmark-1)
BM-3 Benchmark 3 (use but still opportunity for improvement)	LT-UNK 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.)
BM-2 Benchmark 2 (use but search for safer substitutes)	NoGS No GreenScreen.
BM-1 Benchmark 1 (avoid - chemical of high concern)	
BM-U Benchmark Unspecified (due to insufficient data)	
LT-P1 List Translator Possible 1 (Possible Benchmark-1)	

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.