

HP COMMAND Waterborne Acrylic Urethane
Satin HP3920

by Benjamin Moore & Co.

HPD UNIQUE IDENTIFIER: 1162407128064

HPD UNIQUE PRODUCT ID: Not provided.

CLASSIFICATION: 09 90 00 Painting and Coating

PRODUCT DESCRIPTION: HP Command HP3920 is an extremely durable, single-component, multi-substrate solution to help you save time and tackle multiple jobs with confidence. This interior/exterior, UV-resistant acrylic urethane enamel provides superior adhesion and abrasion resistance on a variety of substrates and is ideal for facility maintenance and property management applications where minimal maintenance disruptions and quick returns to service are required.

SCREENING DATE: 2026-06-04

PUBLISHED DATE: 2026-06-05

EXPIRY DATE: 2029-06-04

PREPARER: Self-Prepared

Health Product
Declaration v3.0

created via: HPDC Online Builder

Section 1: Summary

Basic Method / Product Threshold

CONTENT INVENTORY

Inventory Reporting Format	Residuals/Impurities Evaluation	For all contents above the threshold, the manufacturer has:
→ Basic Method	→ Completed	
Threshold Disclosed Per	Explanation(s) provided :	Characterized Yes
→ Product	Yes	Provided weight and role.
Threshold Level		Screened Yes
→ 100 ppm		Provided screening results using HPDC-approved methods.
		Identified Yes
		Provided name and CAS RN or other identifier.

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.

PRODUCT | MATERIAL OR SUBSTANCE | RESIDUAL OR IMPURITY
GREENSCREEN SCORE | HAZARD TYPE

HP COMMAND WATERBORNE ACRYLIC URETHANE SATIN HP3920 [WATER BM-4 TITANIUM DIOXIDE BM-1 * | CAN | END | MAM KAOLIN LT-UNK | CAN C.I. PIGMENT YELLOW 42 (PRIMARY CASRN IS 51274-00-1) LT-UNK ETHENE, HOMOPOLYMER, OXIDIZED LT-UNK DIPROPYLENE GLYCOL N-BUTYL ETHER (DPNB) LT-UNK | EYE CARBON BLACK BM-1 * | CAN | EYE | MAM | PHY IRON OXIDE (FE2O3) (PRIMARY CASRN IS 1309-37-1) BM-1 | CAN | MAM ZINC PHOSPHATE LT-P1 | MUL | AQU | MAM | REP POLYETHYLENE GLYCOL LT-UNK ALCOHOLS, C9-11, ETHOXYLATED LT-P1 | SKI | EYE | AQU ALUMINUM OXIDE BM-2 | CAN | MAM]

Number of Greenscreen BM-4/BM3 contents ... 1

Contents highest-concern GreenScreen score(s) (BM-1, LT-1, LT-P1) ... BM-1, LT-P1

Nanomaterial ... No

INVENTORY AND SCREENING NOTES:

None

*Form-Specific Hazard: This substance's GreenScreen Benchmark or List Translator score and the applicable hazards are related to particulate inhalation, which is expected to occur only during manufacture, installation, maintenance, or demolition, due to activities such as sawing, sanding, grinding, or intensive cleaning. For this reason, this score is intentionally omitted from the "Contents highest concern" line above. See HPDC's Special Conditions policy for more information.

VOLATILE ORGANIC COMPOUND (VOC) CONTENT

Material (g/l): 21.021 Regulatory (g/l): 48.883
Does the product contain exempt VOCs: No
Are colorants available that do not increase the VOC content of the base paint when tinted: Yes

COMPLIANCE See Section 3 for additional listings.

VOC emissions: SCAQMD Rule 1113 Architectural Coatings - Flats, floor coatings, non flat coatings, quick dry enamels, roof coatings only - 2007 amendments

VOC content: EPA Method 24 - Volatile Matter Content (EPA 24)

CONSISTENCY WITH OTHER PROGRAMS

No pre-checks completed or disclosed.

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 3.0, available on the HPDC website at: www.hpd-collaborative.org/hpd-3-0-standard

HP COMMAND WATERBORNE ACRYLIC URETHANE SATIN HP3920

PRODUCT THRESHOLD: 100 ppm

RESIDUALS AND IMPURITIES EVALUATION COMPLETED: Yes

RESIDUALS AND IMPURITIES NOTES: Residuals/Impurities considered where applicable.

OTHER PRODUCT NOTES: None

WATER

ID: 7732-18-5

HAZARD DATA SOURCE: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2026-06-04 10:12:44

%: 50.0000 - 55.0000

GreenScreen: BM-4

RC: None

NANO: No

SUBSTANCE ROLE: Diluent

HAZARD TYPE

LIST NAME AND SOURCE

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

ADDITIONAL LISTINGS

LIST NAME AND SOURCE

NOTIFICATION

EXEMPT

European Union / European Commission (EU EC)

EU - REACH Exemptions

Exempted from REACH Annex IV listing due to intrinsic safety

SUBSTANCE NOTES:

TITANIUM DIOXIDE

ID: 13463-67-7

HAZARD DATA SOURCE: Pharos Chemical and Materials Library

HAZARD SCREENING DATE: 2026-06-04 10:12:44

%: 15.0000 - 20.0000

GreenScreen: BM-1

RC: None

NANO: No

SUBSTANCE ROLE: Pigment

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
CAN	US CDC - Occupational Carcinogens	Occupational Carcinogen**
CAN	CA EPA - Prop 65	Carcinogen - specific to chemical form or exposure route**
CAN	IARC	Group 2B - Possibly carcinogenic to humans - inhaled from occupational sources**
CAN	MAK	Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value**
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor**
CAN	MAK	Carcinogen Group 4 - Non-genotoxic carcinogen with low risk under MAK/BAT levels**
CAN	IARC	Group 2b - Possibly carcinogenic to humans**
CAN	EU - GHS (H-Statements) Annex 6 Table 3-1	H351 - Suspected of causing cancer [Carcinogenicity - Category 2]**
CAN	GHS - Japan	H351 - Suspected of causing cancer [Carcinogenicity - Category 2]**
MAM	GHS - Japan	H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]**
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
POSITIVE LIST	US Environmental Protection Agency (US EPA)	US EPA - DfE Safer Chemicals Ingredients list (SCIL)
		Colorants - Green Circle (Verified Low Concern)
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CPII)	C2C Certified v4.1 Product Standard Restricted Substances - Effective July 1, 2025
		Cosmetics and Personal Care Products
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CPII)	C2C Certified v5.0 Product Standard Restricted Substances - Effective March 16, 2026
		Cosmetics & Personal Care Products

SUBSTANCE NOTES: **Form-Specific Hazard: This substance's GreenScreen Benchmark or List Translator score and the applicable hazards are related to particulate inhalation, which is expected to occur only during manufacture, installation, maintenance, or demolition, due to activities such as sawing, sanding, grinding, or intensive cleaning. See HPDC's Special Conditions policy for more information. Manufacturer's Safety Data Sheet (SDS), if applicable, may offer occupational health and safety information.

KAOLIN
ID: 1332-58-7

HAZARD DATA SOURCE: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2026-06-04 10:12:45	
%: 5.0000 - 10.0000	GreenScreen: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Filler
HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS		
CAN	MAK	Carcinogen Group 3B - Evidence of carcinogenic effects but not sufficient for classification		

ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
None found		No listings found on Additional Hazard Lists
SUBSTANCE NOTES:		

C.I. PIGMENT YELLOW 42 (PRIMARY CASRN IS 51274-00-1)

ID: 131462-81-2

HAZARD DATA SOURCE: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2026-06-04 10:12:45		
%: 1.0000 - 5.0000	GreenScreen: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Pigment
HAZARD TYPE	LIST NAME AND SOURCE		WARNINGS	
None found			No warnings found on HPD Priority Hazard Lists	
ADDITIONAL LISTINGS	LIST NAME AND SOURCE		NOTIFICATION	
None found			No listings found on Additional Hazard Lists	
SUBSTANCE NOTES:				

ETHENE, HOMOPOLYMER, OXIDIZED

ID: 68441-17-8

HAZARD DATA SOURCE: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2026-06-04 10:12:46		
%: 1.0000 - 5.0000	GreenScreen: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Polymer species
HAZARD TYPE	LIST NAME AND SOURCE		WARNINGS	
None found			No warnings found on HPD Priority Hazard Lists	
ADDITIONAL LISTINGS	LIST NAME AND SOURCE		NOTIFICATION	
None found			No listings found on Additional Hazard Lists	
SUBSTANCE NOTES:				

DIPROPYLENE GLYCOL N-BUTYL ETHER (DPNB)

ID: 29911-28-2

HAZARD DATA SOURCE: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2026-06-04 10:12:44		
%: 1.0000 - 5.0000	GreenScreen: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Solvent
HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS		
EYE	GHS - New Zealand	Eye irritation category 2		
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION		
None found		No listings found on Additional Hazard Lists		

CARBON BLACK

ID: 1333-86-4

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2026-06-04 10:12:45**

%: 1.0000 - 5.0000	GreenScreen: BM-1	RC: None	NANO: No	SUBSTANCE ROLE: Pigment
HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS		
CAN	US CDC - Occupational Carcinogens	Occupational Carcinogen**		
CAN	MAK	Carcinogen Group 3B - Evidence of carcinogenic effects but not sufficient for classification**		
CAN	CA EPA - Prop 65	Carcinogen - specific to chemical form or exposure route**		
CAN	IARC	Group 2b - Possibly carcinogenic to humans**		
EYE	GHS - New Zealand	Eye irritation category 2**		
CAN	GHS - New Zealand	Carcinogenicity category 2**		
CAN	GHS - Japan	H351 - Suspected of causing cancer [Carcinogenicity - Category 2]**		
MAM	GHS - Japan	H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]**		
PHY	GHS - Japan	H251 - Self-heating;; may catch fire [Self-heating substances and mixtures - Category 1]**		
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION		
None found		No listings found on Additional Hazard Lists		

SUBSTANCE NOTES: **Form-Specific Hazard: This substance's GreenScreen Benchmark or List Translator score and the applicable hazards are related to particulate inhalation, which is expected to occur only during manufacture, installation, maintenance, or demolition, due to activities such as sawing, sanding, grinding, or intensive cleaning. See HPDC's Special Conditions policy for more information. Manufacturer's Safety Data Sheet (SDS), if applicable, may offer occupational health and safety information.

IRON OXIDE (FE2O3) (PRIMARY CASRN IS 1309-37-1)

ID: 8011-97-0

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2026-06-04 10:12:46**

%: 1.0000 - 5.0000	GreenScreen: BM-1	RC: None	NANO: No	SUBSTANCE ROLE: Pigment
HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS		
CAN	MAK	Carcinogen Group 3B - Evidence of carcinogenic effects but not sufficient for classification		
MAM	GHS - Japan	H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]		
MAM	GHS - Japan	H370 - Causes damage to organs [Specific target organs/systemic toxicity following single exposure - Category 1]		

ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
None found		No listings found on Additional Hazard Lists
SUBSTANCE NOTES:		

ZINC PHOSPHATE

ID: 7779-90-0

HAZARD DATA SOURCE: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2026-06-04 10:12:46	
%: 1.0000 - 5.0000	GreenScreen: LT-P1	RC: None	NANO: No	SUBSTANCE ROLE: Filler
HAZARD TYPE	LIST NAME AND SOURCE		WARNINGS	
MUL	German FEA - Substances Hazardous to Waters		Class 2 - Hazard to Waters	
AQU	EU - GHS (H-Statements) Annex 6 Table 3-1		H400 - Very toxic to aquatic life [Hazardous to the aquatic environment (acute) - Category 1]	
AQU	EU - GHS (H-Statements) Annex 6 Table 3-1		H410 - Very toxic to aquatic life with long lasting effects [Hazardous to the aquatic environment (chronic) - Category 1]	
MAM	GHS - Japan		H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]	
AQU	GHS - New Zealand		Hazardous to the aquatic environment - acute category 1	
AQU	GHS - Japan		H400 - Very toxic to aquatic life [Hazardous to the aquatic environment (acute) - Category 1]	
AQU	GHS - Japan		H410 - Very toxic to aquatic life with long lasting effects [Hazardous to the aquatic environment (chronic) - Category 1]	
AQU	GHS - Australia		H410 - Very toxic to aquatic life with long lasting effects [Hazardous to the aquatic environment (chronic) - Category 1]	
AQU	GHS - New Zealand		Hazardous to the aquatic environment - chronic category 1	
AQU	GHS - Korea		H400 - Very toxic to aquatic life [Hazardous to the aquatic environment (acute) - Category 1]	
AQU	GHS - Korea		H410 - Very toxic to aquatic life with long lasting effects [Hazardous to the aquatic environment (chronic) - Category 1]	
REP	GHS - Japan		H361 - Suspected of damaging fertility or the unborn child [Toxic to reproduction - Category 2]	
ADDITIONAL LISTINGS	LIST NAME AND SOURCE		NOTIFICATION	
None found			No listings found on Additional Hazard Lists	

POLYETHYLENE GLYCOL

ID: 25322-68-3

HAZARD DATA SOURCE: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2026-06-04 10:12:47	
%: 0.5000 - 1.0000	GreenScreen: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Solvent
HAZARD TYPE	LIST NAME AND SOURCE		WARNINGS	
None found			No warnings found on HPD Priority Hazard Lists	
ADDITIONAL LISTINGS	LIST NAME AND SOURCE		NOTIFICATION	
None found			No listings found on Additional Hazard Lists	
SUBSTANCE NOTES:				

ALCOHOLS, C9-11, ETHOXYLATED

ID: 68439-46-3

HAZARD DATA SOURCE: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2026-06-04 10:12:45	
%: 0.5000 - 1.0000	GreenScreen: LT-P1	RC: None	NANO: No	SUBSTANCE ROLE: Surfactant
HAZARD TYPE	LIST NAME AND SOURCE		WARNINGS	
SKI	GHS - New Zealand		Skin irritation category 2	
SKI	GHS - Australia		H315 - Causes skin irritation [Skin corrosion/irritation - Category 2]	
EYE	GHS - New Zealand		Serious eye damage category 1	
AQU	GHS - Japan		H401 - Toxic to aquatic life [Hazardous to the aquatic environment (acute) - Category 2]	
AQU	GHS - Japan		H411 - Toxic to aquatic life with long lasting effects [Hazardous to the aquatic environment (chronic) - Category 2]	
EYE	GHS - Australia		H318 - Causes serious eye damage [Serious eye damage/eye irritation - Category 1]	
ADDITIONAL LISTINGS	LIST NAME AND SOURCE		NOTIFICATION	
None found			No listings found on Additional Hazard Lists	
SUBSTANCE NOTES:				

ALUMINUM OXIDE

ID: 1344-28-1

HAZARD DATA SOURCE: Pharos Chemical and Materials Library			HAZARD SCREENING DATE: 2026-06-04 10:12:45	
%: 0.5000 - 1.0000	GreenScreen: BM-2	RC: None	NANO: No	SUBSTANCE ROLE: Corrosion inhibitor

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
CAN	MAK	Carcinogen Group 2 - Considered to be carcinogenic for man
MAM	GHS - Japan	H335 - May cause respiratory irritation [Specific target organ toxicity - Single exposure - Category 3]
MAM	GHS - Japan	H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]

ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CP II)	C2C Certified v4.1 Product Standard Restricted Substances - Effective July 1, 2025 Children's Toy Products
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CP II)	C2C Certified v5.0 Product Standard Restricted Substances - Effective March 16, 2026 Children's Toy Products

SUBSTANCE NOTES:

Section 3: 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	SCAQMD Rule 1113 Architectural Coatings - Flats, floor coatings, non flat coatings, quick dry enamels, roof coatings only - 2007 amendments	
COMPLIANCE TYPE: Third-party certification CERTIFIER/VERIFIER/TESTING LAB/AUDITOR: berkeley analytical COMPLIANCE DETAILS: COMPLIANCE SCOPE: APPLICABLE FACILITIES: All COMPLIANCE URL: https://www.berkeleyanalytical.com COMPLIANCE NOTES:	ISSUE DATE: 2025-10-23	EXPIRY DATE: 2028-10-23
VOC CONTENT	EPA Method 24 - Volatile Matter Content (EPA 24)	
COMPLIANCE TYPE: Self-declaration CERTIFIER/VERIFIER/TESTING LAB/AUDITOR: Benjamin Moore COMPLIANCE DETAILS: COMPLIANCE SCOPE: APPLICABLE FACILITIES: All COMPLIANCE URL: COMPLIANCE NOTES:	ISSUE DATE: 2026-06-05	EXPIRY DATE: No expiration

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.

GENNEX MANUFACTURER (OR GENERIC): Benjamin Moore
HPD URL: No HPD available ACCESSORY TYPE: Colorant System CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES: None

Section 5: General Notes

No additional notes for this product.

MANUFACTURER INFORMATION

MANUFACTURER: **Benjamin Moore & Co.**
ADDRESS: **360 Route 206**
Flanders, NJ 07836
COUNTRY: **United States**

WEBSITE: **www.Benjaminmoore.com**
CONTACT NAME: **Edja Kouassi**
TITLE: **Sr. Technical Project Manager**
PHONE: **973-252-2607**
EMAIL: **Edja.kouassi@benjaminmoore.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

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

GreenScreen Benchmark scores sometimes also carry subscripts, which provide more context for how the score was determined. These are DG (data gap), TP (transformation product), and CoHC (chemical of high concern). For more information, see 2.2.2.4 GreenScreen® for Safer Chemicals, www.greenscreenchemicals.org, and Best Practices for Hazard Screening on the HPDC website (hpd-collaborative.org).

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 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.