Flotex Modular
by Forbo Flooring Systems

CLASSIFICATION: 09 68 13.00 Finishes: Tile Carpeting

PRODUCT DESCRIPTION: Flotex Modular is a high performance flocked carpet floor covering. It is made of 70 million fibers of Nylon 6.6 per square meter. The fibers are flocked into an adhesive layer, which is compounded into the recycled vinyl cushioned backing. Flotex Modular has an intermediate fiberglass layer which provides stability. Flotex Modular is 5.3mm (0.21”) thick. Sizes available are 50cm x 50cm (19.69” x 19.69”) or 25cm x 100cm (9.8” x 39.37”) and vary by collection.

Section 1: Summary

Basic Method / Product Threshold

CONTENT INVENTORY

<table>
<thead>
<tr>
<th>Threshold Disclosed Per</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material</td>
</tr>
<tr>
<td>Product</td>
</tr>
</tbody>
</table>

Threshold level
- 100 ppm
- 1,000 ppm
- Per GHS SDS
- Per OSHA MSDS
- Other

Residuals/Impurities
- Considered
- Partially Considered
- Not Considered

Are All Substances Above the Threshold Indicated:
- Yes\(^\odot\) No

-characterized
- percent weight and role provided?
- screened
- using priority hazard lists with results disclosed?
- identified
- name and identifier provided?

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.

<table>
<thead>
<tr>
<th>MATERIAL</th>
<th>SUBSTANCE</th>
<th>RESIDUAL OR IMPURITY</th>
<th>GREENSCREEN SCORE</th>
<th>HAZARD TYPE</th>
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</thead>
<tbody>
<tr>
<td>FLOTEX MODULAR</td>
<td>POST-CONSUMERS PVC SOURCED FROM CO-MINGLED SCRAP</td>
<td>RES</td>
<td>LT-P1</td>
<td>RES</td>
</tr>
<tr>
<td></td>
<td>LIMESTONE; CALCIUM CARBONATE (POST-CONSUMER)</td>
<td>RES</td>
<td>LT-UNK</td>
<td>END</td>
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<tr>
<td></td>
<td>POLYVINYL CHLORIDE (PVC)</td>
<td>RES</td>
<td>LT-P1</td>
<td>END</td>
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<td></td>
<td>POLYMERIC TDI</td>
<td>RES</td>
<td>BM-1</td>
<td>EYE</td>
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<tr>
<td></td>
<td>1-HEXANOL, 2-ETHYL-, PHOSPHATE</td>
<td>RES</td>
<td>BM-1</td>
<td>MUL</td>
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<tr>
<td></td>
<td>2,4-/2,6-TOLUENE DIISOCYANATE MIXTURE (TDI 80/20)</td>
<td>RES</td>
<td>LT-1</td>
<td>CAN</td>
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<td>ANTIMONY TRIOXIDE</td>
<td>RES</td>
<td>BM-1</td>
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<td>ZINC BORATE</td>
<td>RES</td>
<td>BM-1</td>
<td>MUL</td>
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<td>POLYETHYLENE TEREPHTHALATE (PET)</td>
<td>RES</td>
<td>LT-UNK</td>
<td>MUL</td>
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<td></td>
<td>CELLULOSE, MICROCRYSTALLINE</td>
<td>RES</td>
<td>NoGS</td>
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</table>

<table>
<thead>
<tr>
<th>VOLATILE ORGANIC COMPOUND (VOC) CONTENT</th>
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</table>

VOC Content data is not applicable for this product category.

CERTIFICATIONS AND COMPLIANCE

See Section 3 for additional listings.
- VOC emissions: CDPH Standard Method V1.2 (Section 01350/CHPS) - Classroom & Office scenario
- LCA: Environmental Product Declaration (EPD) by UL - Industry Generic

CONSISTENCY WITH OTHER PROGRAMS

Pre-checked for LEED v4 Material Ingredients, Option 1

Third Party Verified?
- Yes
- No

PREPARER: Self-Prepared
VERIFIER:
VERIFICATION #:
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

### FLOTEX MODULAR

**PRODUCT THRESHOLD:** 1000 ppm  
**RESIDUALS AND IMPURITIES CONSIDERED:** No

**RESIDUALS AND IMPURITIES NOTES:** No residuals or impurities are expected to be present in the product at or above the reporting threshold.

**OTHER PRODUCT NOTES:**

**POST-CONSUMER PVC SOURCED FROM CO-MINGLED SCRAP**  
ID: 9002-86-2

**No. 17.4600**  
**GS:** LT-P1  
**RC:** PostC  
**NAME:** No  
**ROLE:** Recycled Vinyl Backing

**HAZARD:**  
**RESPIRATORY**  
AOEC - Asthmagens  
Asthmagen (Rs) - sensitizer-induced

**SUBSTANCE NOTES:** Recycled content material of well-defined composition that can be identified by the CAS numbers of the contained chemical substances must be inventoried according to the HPD standard inventory method (the Special Condition for Mixed Recycled Content does not apply).

**LIMESTONE; CALCIUM CARBONATE (POST-CONSUMER)**  
ID: 1317-65-3

**No. 14.8100**  
**GS:** LT-UNK  
**RC:** PostC  
**NAME:** No  
**ROLE:** Recycled Backing

**HAZARD:** None Found  
**RESPIRATORY**  
No warnings found on HPD Priority lists

**SUBSTANCE NOTES:**

**BIS(2-ETHYLHEXYL) TEREPHTHALATE**  
ID: 6422-86-2

**No. 14.1500 - 15.4900**  
**GS:** BM-3  
**RC:** None  
**NAME:** No  
**ROLE:** Plasticiser

**HAZARD:** None Found  
**RESPIRATORY**  
No warnings found on HPD Priority lists

**SUBSTANCE NOTES:**

**POLYVINYL CHLORIDE (PVC)**  
ID: 9002-86-2

**No. 14.1000 - 15.4400**  
**GS:** LT-P1  
**RC:** None  
**NAME:** No  
**ROLE:** Polymer

**HAZARD:**  
**RESPIRATORY**  
AOEC - Asthmagens  
Asthmagen (Rs) - sensitizer-induced

**SUBSTANCE NOTES:**

**LIMESTONE; CALCIUM CARBONATE**  
ID: 1317-65-3

**No. 13.6500 - 14.9900**  
**GS:** LT-UNK  
**RC:** UNK  
**NAME:** No  
**ROLE:** Filler

**HAZARD:** None Found  
**RESPIRATORY**  
No warnings found on HPD Priority lists

**SUBSTANCE NOTES:**

**TITANIUM DIOXIDE**  
ID: 13463-67-7

**No. 4.5800 - 5.9200**  
**GS:** LT-1  
**RC:** None  
**NAME:** No  
**ROLE:** Nylon Fiber

**HAZARD:**  
**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

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Flotex Modular  
hpdrepository.hpd-collaborative.org  
HPD v2.1 created via HPDC Builder Page 2 of 7
The titanium dioxide (TiO2) is bound within the product, requiring no further labeling. Identified on the US EPA Safer Chemical Ingredient List. Form-specific hazards: airborne particles of respirable size – occupational setting. Specific guidelines are being created to address known issues related to transparency and disclosure for several materials (“Special Conditions”), including those with Form-Specific Hazards such as Titanium Dioxide. This HPD will be updated as appropriate when these guidelines become available. The Material Health Harmonization Task Group convened by the USGBC states that pigmentary titanium dioxide was “determined to be Benchmark 2 using the full GS (GreenScreen) method” hpdrepository.hpd-collaborative.org HPD v2.1 created via HPDC Builder Page 2 of 12 (http://ow.ly/Z5ken).

GLASS / MINERAL FIBER (POST-CONSUMER RECYCLED)

<table>
<thead>
<tr>
<th>ID</th>
<th>%</th>
<th>GS:</th>
<th>RC:</th>
<th>NANO:</th>
<th>ROLE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>65997-17-3</td>
<td>2.2200 - 3.5600</td>
<td>LT-UNK</td>
<td>PostC</td>
<td>No</td>
<td>Fiberglass</td>
</tr>
</tbody>
</table>

HAZARDS:
- None Found
- No warnings found on HPD Priority lists

SUBSTANCE NOTES:
- 1-HEXANOL, 2-ETHYL-, PHOSPHATE
  - ID: 78-42-2
  - %: 0.0100 - 1.5800
  - GS: LT-P1
  - RC: None
  - NANO: No
  - ROLE: Bonding Agent

HAZARDS:
- ENDOCRINE
  - TEDX - Potential Endocrine Disruptors
- CANCER
  - MAK
  - CA EPA - Prop 65
  - US NH - Report on Carcinogens
  - Restricted List
  - Skin Irritation
  - Skin Sensitize
  - Eye Irritation
  - Mammalian
  - Respiratory
  - Cancer
- MULTIPLE
  - German FEA - Substances Hazardous to Waters

CANCER
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Carcinogen Group 4 - Non-genotoxic carcinogen with low risk under MAK/BAT levels
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitizing Substance Sah - Danger of airway & skin sensitization

ENDOCRINE
- TEDX - Potential Endocrine Disruptors
- Potential Endocrine Disruptor

MULTIPLE
- German FEA - Substances Hazardous to Waters

POLYMERIC TDI

<table>
<thead>
<tr>
<th>ID</th>
<th>%</th>
<th>GS:</th>
<th>RC:</th>
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<th>ROLE:</th>
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</thead>
<tbody>
<tr>
<td>9017-01-0</td>
<td>0.0100 - 1.5800</td>
<td>LT-P1</td>
<td>None</td>
<td>No</td>
<td>Bonding Agent</td>
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</tbody>
</table>

HAZARDS:
- Restricted List
- US EPA - PPT Chemical Action Plans
- EPA Chemical of Concern - Action Plan published
- Inhalation sensitizer causing asthma and lung damage
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

SUBSTANCE NOTES:
- 2,4-/2,6-TOLUENE DIISOCYANATE MIXTURE (TDI 80/20)
  - ID: 26471-62-5
  - %: 0.0100 - 1.5800
  - GS: LT-1
  - RC: None
  - NANO: No
  - ROLE: Bonding Agent

HAZARDS:
- CANCER
  - IARC - Group 2B - Possibly carcinogenic to humans
  - CA EPA - Prop 65
  - US NH - Report on Carcinogens
  - Restricted List
  - Skin Irritation
  - Skin Sensitize
  - Eye Irritation
  - Mammalian
  - Respiratory
  - Cancer
  - MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
  - MAK-Sensitizing Substance Sah - Danger of airway & skin sensitization
  - MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
  - MAK-Sensitive Substance Sah - Danger of airway & skin sensitization
  - MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
  - MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

CANCER
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- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

MAMMALIAN
- MAK-Sensitizing Substance Sah - Danger of airway & skin sensitization

REACTIVITY
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

MULTIPLE
- German FEA - Substances Hazardous to Waters

SUBSTANCE NOTES:
- BENZENE, MONO-C10-13-ALKYL DERIVS., DISTN. RESIDUES
  - ID: 84961-70-6
  - %: 0.4300 - 1.7700
  - GS: LT-UNK
  - RC: None
  - NANO: No
  - ROLE: Viscosity Modifier

HAZARDS:
- None Found
- No warnings found on HPD Priority lists

SUBSTANCE NOTES:
- POLYMERIC TDI
  - ID: 9017-01-0
  - %: 0.0100 - 1.5800
  - GS: LT-P1
  - RC: None
  - NANO: No
  - ROLE: Bonding Agent

HAZARDS:
- Restricted List
- US EPA - PPT Chemical Action Plans
- EPA Chemical of Concern - Action Plan published
- Inhalation sensitizer causing asthma and lung damage
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

SUBSTANCE NOTES:
- SUBSTANCE NOTES:
- 1-HEXANOL, 2-ETHYL-, PHOSPHATE
  - ID: 78-42-2
  - %: 0.0100 - 1.5800
  - GS: LT-P1
  - RC: None
  - NANO: No
  - ROLE: Bonding Agent

HAZARDS:
- Restricted List
- US EPA - PPT Chemical Action Plans
- EPA Chemical of Concern - Action Plan published
- Inhalation sensitizer causing asthma and lung damage
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

SUBSTANCE NOTES:
- POLYMERIC TDI
  - ID: 9017-01-0
  - %: 0.0100 - 1.5800
  - GS: LT-P1
  - RC: None
  - NANO: No
  - ROLE: Bonding Agent

HAZARDS:
- Restricted List
- US EPA - PPT Chemical Action Plans
- EPA Chemical of Concern - Action Plan published
- Inhalation sensitizer causing asthma and lung damage
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

SUBSTANCE NOTES:
- BENZENE, MONO-C10-13-ALKYL DERIVS., DISTN. RESIDUES
  - ID: 84961-70-6
  - %: 0.4300 - 1.7700
  - GS: LT-UNK
  - RC: None
  - NANO: No
  - ROLE: Viscosity Modifier

HAZARDS:
- None Found
- No warnings found on HPD Priority lists

SUBSTANCE NOTES:
- POLYMERIC TDI
  - ID: 9017-01-0
  - %: 0.0100 - 1.5800
  - GS: LT-P1
  - RC: None
  - NANO: No
  - ROLE: Bonding Agent

HAZARDS:
- Restricted List
- US EPA - PPT Chemical Action Plans
- EPA Chemical of Concern - Action Plan published
- Inhalation sensitizer causing asthma and lung damage
- MAK-Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value
- MAK-Sensitive Substance Sah - Danger of airway & skin sensitization

SUBSTANCE NOTES:
- BENZENE, MONO-C10-13-ALKYL DERIVS., DISTN. RESIDUES
  - ID: 84961-70-6
  - %: 0.4300 - 1.7700
  - GS: LT-UNK
  - RC: None
  - NANO: No
  - ROLE: Viscosity Modifier

HAZARDS:
- None Found
- No warnings found on HPD Priority lists

SUBSTANCE NOTES:
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<th>Substance</th>
<th>ID</th>
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<th>GS</th>
<th>RC</th>
<th>NANO</th>
<th>ROLE</th>
<th>AGENCY(IES) WITH WARNINGS</th>
<th>HAZARDS</th>
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<tbody>
<tr>
<td><strong>Respiratory</strong></td>
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<td><strong>Cancer</strong></td>
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<td>sufficient to establish MAK/BAT value</td>
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<td>MAK - Carcinogen Group 3A - Evidence of carcinogenic effects but not</td>
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<td>MAK - Carcinogen Group 2 - Considered to be carcinogenic for man</td>
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<td>2538-58-9</td>
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<td>LT-UNK</td>
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<td>No</td>
<td>Fleece</td>
<td>ChemSec - SIN List - CMR - Carcinogen, Mutagen &amp;/or Reproductive</td>
<td>MAK - Carcinogen Group 2 - Considered to be carcinogenic for man</td>
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<td>(PET)</td>
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<td><strong>Cellulose, Microcrystalline</strong></td>
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<td>MAK - Carcinogen Group 2 - Considered to be carcinogenic for man</td>
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<td>1.8900</td>
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</table>
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.

<table>
<thead>
<tr>
<th>VOC EMISSIONS</th>
<th>CDPH Standard Method V1.2 (Section 01350/CHPS) - Classroom &amp; Office scenario</th>
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</thead>
<tbody>
<tr>
<td>CERTIFYING PARTY:</td>
<td>Third Party</td>
</tr>
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<td>APPLICABLE FACILITIES:</td>
<td>All</td>
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<tr>
<td>CERTIFICATE URL:</td>
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<tr>
<td>ISSUE DATE:</td>
<td>2017-11-16</td>
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<tr>
<td>EXPIRY DATE:</td>
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<tr>
<td>CERTIFIER OR LAB:</td>
<td>Berkeley Analytical</td>
</tr>
<tr>
<td>CERTIFICATION AND COMPLIANCE NOTES:</td>
<td>LCA</td>
</tr>
</tbody>
</table>

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.

FORBO FRT 950 ADHESIVE (VOC 0.00 G/L)  
HPD URL: No HPD available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Standard recommended pressure sensitive adhesive used for releasable installation.

FORBO T 940 ADHESIVE (VOC 0.00 G/L)  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Alternate adhesive that can be used for a permanent installation.

FORBO SUSTAIN 885M ADHESIVE (VOC 0.00 G/L)  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Alternative adhesive that can be used for permanent installation.

FORBO SUSTAIN 1195 ADHESIVE (VOC 0.00 G/L)  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Alternative adhesive that can be used for permanent installation.

FORBO FRS 885 ADHESIVE (VOC 0.00 G/L)  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Alternative adhesive that can be used for permanent installation.

FORBO FST 1299 ADHESIVE (VOC 0.00 G/L)  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Alternative adhesive that can be used for permanent installation.

FORBO 660 ADHESIVE (VOC 12.00 G/L)  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Alternative adhesive that can be used for permanent installation.

FORBO READY TO USE NUETRAL PH CLEANER  
HPD URL: No HPD Available
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Can be used for routine cleaning.

FORBO WALL BASE  
HPD URL: http://www.forboflooringna.com
CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES:
Can be used with Forbo Flotex Modular Installation, using one of the approved adhesives.

Section 5: General Notes
Products lines that fall under the category of Flotex Modular are the following: Seagrass, Triad, Integrity², Complexity, Stratus, Cirrus, Pinstripe, Metro, Calgary, & Penang. Integrity², Complexity, Stratus, Cirrus, Pinstripe, Metro, Calgary, Penang are available in a 20" x 20" tile format. Seagrass & Triad are available in 39.37" x 9.48"
**Manufacturer Information**

**Manufacturer:** Forbo Flooring Systems  
**Address:** 8 Maplewood Drive  
Hazle Township PA 18202, United States  
**Website:** www.forboflooringna.com

**Contact Information:**  
**Name:** Shannon Wolski  
**Title:** Product Support and Education Services Administrator  
**Phone:** 5704500319  
**Email:** shannon.wolski@forbo.com

**Key**

OSH/MRDs 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**

- **AQX** Aquatic toxicity  
- **CAN** Cancer  
- **DEV** Developmental toxicity  
- **END** Endocrine activity  
- **EYE** Eye irritation/comorbidity  
- **GEN** Genes mutability  
- **GLO** Global warming  
- **MAM** Mammalian/systemic/organ toxicity  
- **MUL** Multiple hazards  
- **OZO** Ozone depletion  
- **PBT** Persistent Bioaccumulative Toxic  
- **PHY** Physical Hazard (reactive)  
- **REP** Reproductive toxicity  
- **RES** Respiratory sensitization  
- **SKL** Skin sensitization/irritation/comorbidity  
- **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 substitute)  
- **BM-1** Benchmark 1 (avoid - chemical of high concern)  
- **BM-U** Benchmark Unspecified (insufficient 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

**Other Terms**

- **Nano** Composed of nano scale particles or nanotechnology  
- **Third Party** Verified 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.