



August 1, 2017

Subject: HARPC Statement

To whom it may concern,

Detrex Hydrochloric Acid Products processed at our Ashtabula, OH facility, which are labeled as Food Grade, are manufactured, stored, packaged, analyzed, and labeled in accordance with the applicable sections of Title 21 of the Code of Federal Regulations.

In addition, Detrex has begun development of a food safety program that will meet the proposed Hazard Analysis and Risk Based Preventative Controls (HARPC) requirements in the new Food Safety Modernization Act, signed into law in 2012.

It shall be Detrex policy to develop and implement an FDA compliant HARPC program voluntarily, and to have the implementation of that plan verified by a qualified third party, prior to the date of any FDA regulatory requirements for mandatory implementation of these requirements.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Vence", is written over the word "Sincerely,".

Jim Vence  
Technical Director  
Detrex Chemicals