

Scientific Documentation

Calcium Pantothenate, Powder, USP

Not appropriate for regulatory submission.

Please visit www.spectrumchemical.com or contact Tech Services for the most up-to-date information contained in this information package.

Spectrum Chemical Mfg Corp
769 Jersey Avenue
New Brunswick, NJ 08901
Phone 732.214.1300



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Specification for Calcium Pantothenate, Powder, USP (CA159)

Item Number	CA159
Item	Calcium Pantothenate, Powder, USP
CAS Number	137-08-6
Molecular Formula	$C_{18}H_{32}CaN_2O_{10}$
Molecular Weight	476.53
MDL Number	
Synonyms	Vitamin B ₅ ; D[+]-N-[2,4-Dihydroxy-3,3-dimethylbutyryl]-Beta-alanine ; D-Pantothenic Acid Hemicalcium Salt

Test	Specification	
	Min	Max
SPECIFIC ROTATION $[\alpha]_D$	+25.0 to+27.5	
NITROGEN CONTENT	5.7 - 6.0 %	
CALCIUM CONTENT	8.2 - 8.6 %	
LOSS ON DRYING		5.0 %
ALKALINITY		TO PASS TEST
HEAVY METALS		0.002 %
ORDINARY IMPURITIES		1.0 %
ORGANIC VOLATILE IMPURITIES		TO PASS TEST
IDENTIFICATION		TO PASS TEST
EXPIRATION DATE		

Spectrum Chemical Mfg Corp

Corporate Headquarters:	West Coast Facility:
769 Jersey Ave.	14422 S. San Pedro St.
New Brunswick, NJ 08901	Gardena, CA 90248
732.214.1300	310.516.8000

Certificate Of Analysis

Item Number	CA159	Lot Number	1KB0719
Item	Calcium Pantothenate, Powder, USP	CAS Number	137-08-6
Molecular Formula	C ₁₈ H ₃₂ CaN ₂ O ₁₀	Molecular Weight	476.53

TEST	SPECIFICATION		RESULT
	MIN	MAX	
ASSAY (DRIED BASIS)	98.0	102.0 %	98.4 %
CALCIUM CONTENT (Ca; DRIED BASIS)	8.2	8.6 %	8.32 %
OPTICAL ROTATION	+25.0° to +27.5°		+26.7°
LOSS ON DRYING		5.0 %	3.7 %
ALKALINITY	NO PINK COLOR		NO PINK COLOR
ELEMENTAL IMPURITIES:			.
CADMIUM (Cd)	AS REPORTED		<1 µg/g
LEAD (Pb)	AS REPORTED		<2 µg/g
ARSENIC (As)	AS REPORTED		<1 µg/g
MERCURY (Hg)	AS REPORTED		<0.1 µg/g
CHROMIUM (Cr)	AS REPORTED		<0.1 µg/g
IDENTIFICATION (A)	SPECTRUM MATCHES REFERENCE		SPECTRUM MATCHES REFERENCE
IDENTIFICATION (B)	POSITIVE FOR CALCIUM		POSITIVE FOR CALCIUM
IDENTIFICATION (C)	+25.0°to+27.5°		+26.7°
CERTIFIED KOSHER			CERTIFIED KOSHER
CERTIFIED HALAL			CERTIFIED HALAL
EXPIRATION DATE			02-NOV-2023
DATE OF MANUFACTURE			03-NOV-2020
APPEARANCE			WHITE POWDER
RESIDUAL SOLVENTS	AS REPORTED		.
CLASS 2 (SOLVENT) / METHANOL			<3000 ppm
CLASS 3 (solvent) / ETHYL ACETATE			<5000 ppm

TEST	SPECIFICATION		RESULT
	MIN	MAX	
MONOGRAPH EDITION			(USP) 43

Certificate of Analysis Results Entered By:

HBERMUDEZ
Hernan Bermudez
07-MAR-23 17:55:07

Certificate of Analysis Results Approved By:

JRUIZ
Jesus Ruiz
13-MAR-23 13:41:21

Spectrum Chemical Mfg Corp
14422 South San Pedro Street
Gardena 90248 CA



All pharmaceutical ingredients are tested using current edition of applicable pharmacopeia.

Read and understand label and SDS before handling any chemicals. All Spectrum's chemicals are for manufacturing, processing, repacking or research purposes by experienced personnel only. It is the customer's responsibility to provide adequate hazardous material training and ensure that appropriate Personal Protective Equipment (PPE) is used before handling any chemical.

The Elemental Impurities standards implemented by USP and other Pharmaceutical Compendia reflect a growing understanding of the toxicology of trace levels of elemental impurities that can remain in drug substances originating from either raw materials or manufacturing processes. Identifying and quantifying impurities can be critical to predicting the best possible patient outcomes. Elemental Impurities has been a requirement of all products meeting USP/NF, EP and BP monographs since January 1, 2018. More information can be found in USP sections <232> Elemental Impurities – Limits and <233> Elemental Impurities – Procedures. Data for drug substances furnished by Spectrum Chemical Mfg. Corp can be used to ensure that patient daily exposures by oral administration to the selected elements are not exceeded in the formulation of pharmaceutical products.

SAFETY DATA SHEET

spectrum®



Revision date 08-December-2021

Revision Number 3

1. Identification

Product identifier

Product Name CALCIUM PANTOTHENATE, POWDER, USP

Other means of identification

Product Code(s) CA159

This SDS also covers the following products
C1143

Synonyms None

Recommended use of the chemical and restrictions on use

Recommended use Industrial.

Restrictions on use No information available

Details of the supplier of the safety data sheet

Supplier Address

Spectrum Chemical Mfg. Corp.
14422 South San Pedro St.
Gardena, CA 90248
(310) 516-8000

Emergency telephone number

Emergency Telephone Chemtrec 1-800-424-9300

2. Hazard(s) identification

Classification

This chemical is not considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Hazards not otherwise classified (HNOC)

Not applicable

Label elements

Hazard statements

This chemical is not considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

The product contains no substances which at their given concentration, are considered to be hazardous to health.

Appearance Crystalline powder or Prills	Physical state Solid	Odor Odorless
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Other information

No information available.

3. Composition/information on ingredients

Substance

Chemical name	CAS No	Weight-%	Trade secret
Calcium Pantothenate	137-08-6	100	*

*The exact percentage (concentration) of composition has been withheld as a trade secret.

4. First-aid measures

Description of first aid measures

Inhalation	Remove to fresh air.
Eye contact	Rinse thoroughly with plenty of water for at least 15 minutes, lifting lower and upper eyelids. Consult a physician.
Skin contact	Wash skin with soap and water.
Ingestion	Clean mouth with water and drink afterwards plenty of water.

Most important symptoms and effects, both acute and delayed

Symptoms No information available.

Indication of any immediate medical attention and special treatment needed

Note to physicians Treat symptomatically.

5. Fire-fighting measures

Suitable Extinguishing Media	Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Large Fire	CAUTION: Use of water spray when fighting fire may be inefficient.
Unsuitable extinguishing media	Do not scatter spilled material with high pressure water streams.
Specific hazards arising from the chemical	No information available.
Hazardous combustion products	Carbon Monoxide, Carbon Dioxide. Nitrogen oxides (NOx). Calcium oxides.
Explosion data	
Sensitivity to mechanical impact	none.
Sensitivity to static discharge	none.
Special protective equipment for	Firefighters should wear self-contained breathing apparatus and full firefighting turnout

fire-fighters

gear. Use personal protection equipment.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

Personal precautions Ensure adequate ventilation.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Pick up and transfer to properly labeled containers.

7. Handling and storage

Precautions for safe handling

Advice on safe handling Handle in accordance with good industrial hygiene and safety practice.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep container tightly closed in a dry and well-ventilated place.

8. Exposure controls/personal protection

Control parameters

Exposure Limits The following ingredients are the only ingredients of the product above the cut-off level (or level that contributes to the hazard classification of the mixture) which have an exposure limit applicable in the region for which this safety data sheet is intended or other recommended limit. At this time, the other relevant constituents have no known exposure limits from the sources listed here.

Appropriate engineering controls

Engineering controls Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection No special protective equipment required.

Skin and body protection No special protective equipment required.

Respiratory protection No protective equipment is needed under normal use conditions. If exposure limits are exceeded or irritation is experienced, ventilation and evacuation may be required.

General hygiene considerations Handle in accordance with good industrial hygiene and safety practice.

9. Physical and chemical properties

Information on basic physical and chemical properties

Physical state	Solid
Appearance	Crystalline powder or Prills
Color	White
Odor	Odorless
Odor threshold	No information available

Property	Values	Remarks • Method
pH	no data available	None known
Melting point / freezing point	190 - 195 °C / 374 - 383 °F	None known
Boiling point / boiling range	no data available	None known
Flash point	93.3 °C / 199.9 °F	None known
Evaporation rate	no data available	None known
Flammability (solid, gas)	no data available	None known
Flammability Limit in Air		None known
Upper flammability or explosive limits	No data available	
Lower flammability or explosive limits	No data available	
Vapor pressure	No data available	None known
Vapor density	no data available	None known
Relative density	1.27	None known
Water solubility	Soluble in water	None known
Solubility(ies)	Soluble in Acetone Soluble in Glycerin Soluble in Methanol Insoluble in Chloroform	None known
Partition coefficient	No data available	None known
Autoignition temperature	no data available	None known
Decomposition temperature		None known
Kinematic viscosity	no data available	None known
Dynamic viscosity	No data available	None known
Other information		
Explosive properties	No information available	
Oxidizing properties	No information available	
Softening point	No information available	
Molecular weight	476.53	
VOC Content (%)	No information available	
Liquid Density	No information available	
Bulk density	No information available	

10. Stability and reactivity

Reactivity	No information available.
Chemical stability	Stable under normal conditions.
Possibility of hazardous reactions	None under normal processing.
Conditions to avoid	None known based on information supplied.
Incompatible materials	None known based on information supplied.
Hazardous decomposition products	None known based on information supplied.

11. Toxicological information**Information on likely routes of exposure**

Inhalation	Specific test data for the substance or mixture is not available.
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Eye contact	Specific test data for the substance or mixture is not available.
Skin contact	Specific test data for the substance or mixture is not available.
Ingestion	Specific test data for the substance or mixture is not available.

Symptoms related to the physical, chemical and toxicological characteristics

Symptoms No information available.

Acute toxicity

Numerical measures of toxicity

Component Information

Chemical name	Oral LD50	Dermal LD50	Inhalation LC50
Calcium Pantothenate 137-08-6	> 10 g/kg (Rat)	-	-

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Skin corrosion/irritation	No information available.
Serious eye damage/eye irritation	No information available.
Respiratory or skin sensitization	No information available.
Germ cell mutagenicity	No information available.
Reproductive toxicity	No information available.
STOT - single exposure	No information available.
STOT - repeated exposure	No information available.
Aspiration hazard	No information available.
Other adverse effects	No information available.
Interactive effects	No information available.

12. Ecological information

Ecotoxicity	The environmental impact of this product has not been fully investigated.
Persistence and degradability	No information available.
Bioaccumulation	Inherently biodegradable.
Other adverse effects	No information available.

13. Disposal considerations

Waste treatment methods

Waste from residues/unused products	Dispose of in accordance with local regulations. Dispose of waste in accordance with environmental legislation.
Contaminated packaging	Do not reuse empty containers.

14. Transport information

<u>DOT</u>	not regulated
<u>TDG</u>	not regulated
<u>MEX</u>	not regulated
<u>ICAO (air)</u>	not regulated
<u>IATA</u>	not regulated
<u>IMDG</u>	not regulated
<u>RID</u>	not regulated
<u>ADR</u>	not regulated
<u>ADN</u>	not regulated

15. Regulatory information

International Inventories

TSCA	Complies
DSL/NDSL	Complies
EINECS/ELINCS	Complies
ENCS	This product complies with ENCS:
IECSC	This product complies with China:
KECL	Complies
PICCS	Complies
AICS	All the constituents of this material are listed on the Australian Inventory of Chemical Substances (AICS).

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory

DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances

ENCS - Japan Existing and New Chemical Substances

IECSC - China Inventory of Existing Chemical Substances

KECL - Korean Existing and Evaluated Chemical Substances

PICCS - Philippines Inventory of Chemicals and Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product does not contain any chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372.

SARA 311/312 Hazard Categories

Should this product meet EPCRA 311/312 Tier reporting criteria at 40 CFR 370, refer to Section 2 of this SDS for appropriate classifications.

CWA (Clean Water Act)

This product does not contain any substances regulated as pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42).

CERCLA

This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level

pertaining to releases of this material.

US State Regulations

California Proposition 65

This product does not contain any Proposition 65 chemicals.

U.S. State Right-to-Know Regulations

This product does not contain any substances regulated under applicable state right-to-know regulations

U.S. EPA Label Information

EPA Pesticide Registration Number Not applicable

16. Other information

NFPA

Health hazards 0

Flammability 2

Instability 0

Physical and chemical properties -

HMIS

Health hazards 0

Flammability 2

Physical hazards 0

Personal protection X

Key or legend to abbreviations and acronyms used in the safety data sheet

Legend Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

TWA	TWA (time-weighted average)	STEL	STEL (Short Term Exposure Limit)
Ceiling	Maximum limit value		

Key literature references and sources for data used to compile the SDS

Agency for Toxic Substances and Disease Registry (ATSDR)
U.S. Environmental Protection Agency ChemView Database
European Food Safety Authority (EFSA)
EPA (Environmental Protection Agency)
Acute Exposure Guideline Level(s) (AEGl(s))
U.S. Environmental Protection Agency Federal Insecticide, Fungicide, and Rodenticide Act
U.S. Environmental Protection Agency High Production Volume Chemicals
Food Research Journal
Hazardous Substance Database
International Uniform Chemical Information Database (IUCLID)
Japan GHS Classification
Australia National Industrial Chemicals Notification and Assessment Scheme (NICNAS)
NIOSH (National Institute for Occupational Safety and Health)
National Library of Medicine's ChemID Plus (NLM CIP)
National Library of Medicine's PubMed database (NLM PUBMED)
National Toxicology Program (NTP)
New Zealand's Chemical Classification and Information Database (CCID)
Organization for Economic Co-operation and Development Environment, Health, and Safety Publications
Organization for Economic Co-operation and Development High Production Volume Chemicals Program
Organization for Economic Co-operation and Development Screening Information Data Set
World Health Organization

Revision date 08-December-2021

Revision Note No information available.

Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage,

transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet



Certification of Compliance with current Good Manufacturing Practices

Dear Valued Customer:

Spectrum Chemical Mfg Corp certifies that the following product(s) is produced, processed, packaged and held in compliance with current Good Manufacturing Practices (cGMP) in accordance with the applicable parts of 21 CFR, parts 210 and 211 of the Code of Federal Regulations.

Catalog Number	Product Name
CA159	Calcium Pantothenate, Powder, USP

Spectrum is an FDA registered and inspected Drug Establishment. Our United States Food and Drug Administration (USFDA) Registration numbers are as follows:

Spectrum-Gardena, CA: 2020632
Spectrum-New Brunswick, NJ: 2246824

Thank you for your interest in Spectrum products. If we may be of further assistance, please feel free to contact the Quality Assurance department at 310-516-8000 or via email at qualityassurance@spectrumchemical.com

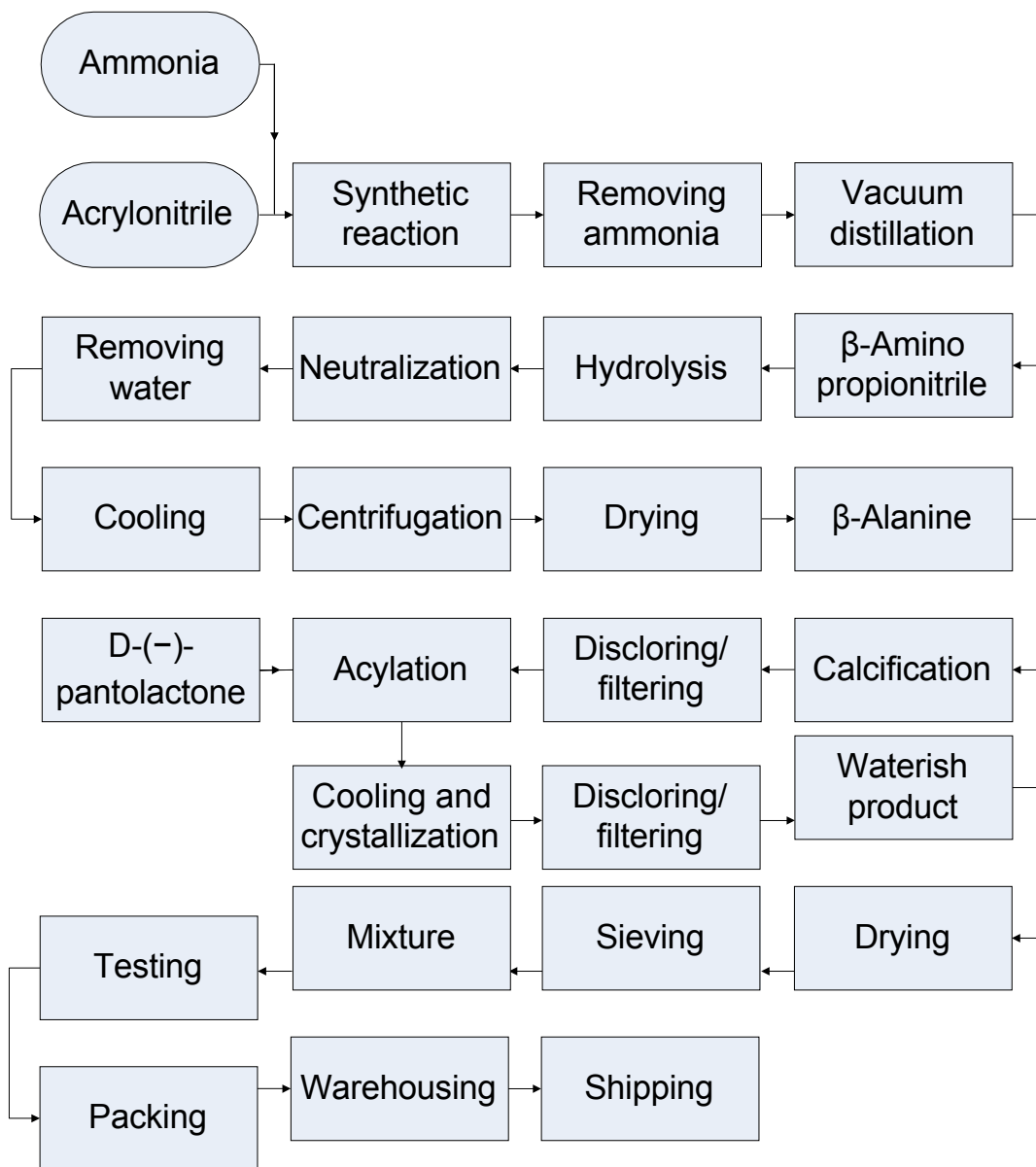
Sincerely,

A handwritten signature in black ink, appearing to read "Oralia Chavez".

Oralia Chavez
Quality Assurance Specialist

Manufacturing Process Flowchart

Calcium Pantothenate, Powder, USP - CA159



Spectrum Chemical Mfg Corp

Corporate Headquarters:

769 Jersey Ave.
New Brunswick, NJ 08901
732.214.1300

West Coast Facility:

14422 S. San Pedro St.
Gardena, CA 90248
310.516.8000

CA159, Calcium Pantothenate, Powder, USP

Source Statement

The above mentioned catalog item is manufactured by chemical synthesis. No animal or plant derived products are used in the manufacturing process.

BSE/TSE Statement

The above mentioned catalog item does not contain nor is manufactured using any animal derived products and is therefore, BSE/TSE free.

Allergen Statement

The above mentioned catalog item does not contain any of the following:

- Milk
- Egg
- Fish
- Shellfish
- Tree Nuts
- Wheat
- Peanuts
- Soy
- Cereals containing Gluten
- Celery
- Mustard
- Sesame Seed
- Corn
- Latex
- Sulfites > 10 ppm

EU Fragrance Allergen Statement

The above mentioned catalog item does not contain any of the 26 EU fragrance allergens listed in Annex III lines 67-92. These substances are not intentionally added to the above mentioned catalog item and therefore are not expected to be present.

GMO Statement

The above mentioned catalog item is manufactured without the use of genetically modified organisms and is therefore GMO free.

Melamine Statement

The above mentioned catalog does not use or add melamine to the manufacturing process and is considered melamine-free.

Nitrosamine Statement

Based on knowledge of the manufacturing process, nitrosamine impurities are not known or suspected to be present in this material.

Animal Testing Statement

The above mentioned catalog item has not been tested on animals.

Organic Compliance Statement

The above mentioned catalog item has not been produced using GMOs, irradiation, ethylene oxide (EtO) or sewage sludge.

Shelf Life Statement

The above mentioned catalog item is typically assigned a shelf life of 36 months from the date of manufacture. The actual assigned shelf life for any specific lot should be referenced on the Certificate of Analysis.

Other Chemicals Statement

Spectrum does not have any reason to suspect the above mentioned catalog item contains any of the following chemicals. This product does not come into contact with these chemicals during packaging or storage:

- | | |
|---------------------|-----------------|
| • Aflatoxins | • Parabens |
| • Antibiotics | • Pesticides |
| • Bisphenol A (BPA) | • Phthalates |
| • CMR Substances | • Preservatives |



RE: Elemental Impurities - Calcium Pantothenate, Powder, USP (Cat# CA159)

To Whom It May Concern:

Thank you for your interest in Spectrum high quality chemicals.

The above material complies with the USP<232>, <233> Elemental Impurities and the ICH Q3D Elemental Impurities Guideline. The following elemental impurities are likely to be present:

Elemental Impurity		Class	Expected Concentration
Cadmium	Cd	1	< 1.0 ppm
Lead	Pb	1	< 2.0 ppm
Arsenic	As	1	< 1.0 ppm
Mercury	Hg	1	< 0.1 ppm

Other elemental impurities considered by USP <232>, <233> and ICH Q3D which are not addressed in the above mentioned table are not likely to be present. These substances are not used in the production process, are not intentionally added or known to be present in the above mentioned material.

This information is subject to change and is intended for risk assessment only. It is responsibility of the end user to evaluate suitability of any chemical for the intended use as well as to assess compound-specific limits of daily intake of metal impurities. For lot-specific information, please refer to the respective Certificate of Analysis.

If you have any further questions, please contact us by telephone at 1(800)772-8786 Option 2, or by email at TechServices@spectrumchemical.com.

Sincerely,

Technical Services
Spectrum Chemical Mfg. Corp.

This document has been produced electronically and is valid without a signature.

CORPORATE HEADQUARTERS

769 Jersey Avenue

New Brunswick, NJ 08901

PHONE 732.214.1300

FAX 732.246.7132

WEST COAST FACILITY

14422 South San Pedro Street

Gardena, California 90248

PHONE 310.516.8000

FAX 310.516.9843



RE: Residual Solvents - Calcium Pantothenate, Powder, USP (Cat# CA159)

To Whom It May Concern:

Thank you for your interest in Spectrum high quality chemicals.

The above mentioned catalog item complies with the requirements of USP <467> Residual Solvents and ICH Q3C Residual Solvents Guideline. The following solvents are likely to be present:

Residual Solvent	Class	Expected Concentration
Methanol	2	< 3000 ppm
Ethyl Acetate	3	< 5000 ppm

No Class 1 or other solvents are used or produced in the manufacturing process of this material.

For lot-specific information, please refer to the respective Certificate of Analysis.

If you have any further questions, please contact us by telephone at 1(800)772-8786 Option 2, or by email at TechServices@spectrumchemical.com.

Sincerely,

Technical Services
Spectrum Chemical Mfg. Corp.

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WEST COAST FACILITY

14422 South San Pedro Street

Gardena, California 90248

PHONE 310.516.8000

FAX 310.516.9843

Label Information

The Spectrum label presents technical and safety information in an easily understood format. Our technical specialists stay abreast of the latest requirements of the Globally Harmonized System for Classification and Labelling of Chemicals (GHS), as well as the Occupational Safety and Health Administration (OSHA), the Food and Drug Administration (FDA) and other government regulatory agencies in order to ensure compliance, accuracy and concise hazard communication. Below you will find a typical label example for this catalog item.

USE CARE: This material has been evaluated per GHS/OSHA criteria and is not classified as hazardous. All chemicals may pose unknown hazards and must be used with caution. Use personal protection and safe handling methods consistent with proper workplace safety practices. Consult SDS for additional properties and precautions. If adverse reaction occurs seek medical attention.

KEEP FROM CHILDREN

CA159

SIZ SY

Calcium Pantothenate

Powder, USP

CAS 137-08-6

CAUTION: For manufacturing, processing or repacking.
Read and understand the label and Safety Data Sheet (SDS) prior to use.

Chemical Emergency: (800)424-9300

www.SpectrumChemical.com

$C_{16}H_{32}CaN_2O_{10}$ F.W. 476.53

Assay (Dried Basis) 98.0-102.0%
Calcium Content (Ca; Dried Basis) 8.2-8.6%
Optical Rotation +25.0° to +27.5°

MAXIMUM LIMITS

Loss on Drying 5.0%
Alkalinity To pass test
Elemental Impurities As reported
Residual Solvents To pass test

LIGHT SENSITIVE, HYGROSCOPIC: Keep tightly closed in light-resistant containers.

FLUSHED WITH NITROGEN

WARNING: Cancer and Reproductive Harm-
www.P65Warnings.ca.gov

G 13/H1GHS ? Lot No. XQ####

Exp. Date: 00-00-0000

Spectrum Chemical Mfg Corp

Corporate Headquarters:

769 Jersey Ave.
New Brunswick, NJ 08901
732.214.1300

West Coast Facility:

14422 S. San Pedro St.
Gardena, CA 90248
310.516.8000



KOSHER SUPERVISION OF AMERICA

בס"ד
Jan 18, 2024

The following product(s) prepared by the named company are certified kosher with the stated requirements:

Spectrum Laboratory Products, Inc.

S-0032

14422 South San Pedro Street,
Gardena, CA 90248
755-769 Jersey Ave.
New Brunswick NJ 08901
USA

Product Name	CA159, Calcium Pantothenate, Powder, USP
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Brand	Spectrum
--------------	-----------------

UKD-ID	KSAV3-E2B2R9
---------------	---------------------

D/P/M	P
--------------	----------

Symbol Required	KSA
------------------------	------------

Special Conditions

This certificate expires on
Feb 01, 2025

Rabbi Binyomin Lisbon
Kashrus Administrator

Placing the KSA logo on products not listed above constitutes an un-authorized use of the KSA symbol, which is a federally registered trademark.