

Chain of Custody: 626190

Client: US Food & Drug Adminitration Address: Office of Cosmetics & Colors 4300 River Road

College Park, MD 20740

Attention: John Gasper

Job Name: Assignment DFPG #21-18 Job Location: Batch No. 03242021 (Batch #3)

Job Number: CLIN 0001 PO Number: 75F40119P10689 Date Submitted: 4/12/2021

Date Analyzed: 5/14/2021-5/28/2021

Report Date: 7/23/2021 **Date Sampled: Not Provided** Person Submitting: Martha Schwartz Revised: 7/27/2021 (Revision #1)

#### **SUMMARY OF ANALYSIS**

		TEM LOD	TEM LOQ	% Chrysotile by TEM	% Tremolite by TEM	% Total Chrysotile & Tremolite by TEM	%	%	% Acid	%	
AMA Sample ID	Client Sample ID	Using ASTM D5756	Using ASTM D5756	Using ASTM D5756	Using ASTM D5756	Using ASTM D5756	Asbestos	Organics	Soluable	Other	Comments
		Mass Calculation	Mass Calculation	Mass Calculation	Mass Calculation	Mass Calculation	by PLM	•			
626190-1A	03242021-1	0.00000243%	0.00000973%	ND	ND	< 0.00001%	ND	25.48%	3.43%	71.08%	
626190-1B	03242021-1	0.00000336%	0.00001346%	ND	ND	< 0.00001%	ND	25.57%	5.03%	69.40%	
626190-1C	03242021-1	0.00000256%	0.00001023%	ND	ND	< 0.00001%	ND	25.42%	3.79%	70.79%	
626190-2A	03242021-2	0.00000197%	0.00000788%	ND	ND	< 0.00001%	ND	61.83%	7.88%	30.29%	
626190-2B	03242021-2	0.00000194%	0.00000777%	ND	ND	< 0.00001%	ND	61.77%	8.08%	30.15%	
626190-2C	03242021-2	0.00000214%	0.00000857%	ND	ND	< 0.00001%	ND	61.79%	7.98%	30.23%	
626190-3A	03242021-3	0.00000272%	0.00001089%	ND	ND	< 0.00001%	ND	17.60%	3.43%	78.97%	
626190-3B	03242021-3	0.00000246%	0.00000984%	ND	ND	< 0.00001%	ND	17.37%	3.54%	79.09%	
626190-3C	03242021-3	0.00000269%	0.00001077%	ND	ND	< 0.00001%	ND	17.22%	6.64%	76.14%	
626190-4A	03242021-4	0.00000310%	0.00001239%	ND	ND	< 0.00001%	ND	2.42%	1.16%	96.42%	
626190-4B	03242021-4	0.00000347%	0.00001388%	ND	ND	< 0.00001%	ND	2.49%	4.14%	93.37%	
626190-4C	03242021-4	0.00000278%	0.00001112%	ND	ND	< 0.00001%	ND	2.42%	3.72%	93.85%	
626190-5A	03242021-5	0.00000201%	0.00000802%	ND	ND	< 0.00001%	ND	20.57%	10.56%	68.86%	
626190-5B	03242021-5	0.00000217%	0.00000866%	ND	ND	< 0.00001%	ND	20.48%	9.83%	69.69%	= 1
626190-5C	03242021-5	0.00000201%	0.00000804%	ND	ND	< 0.00001%	ND	20.51%	10.70%	68.79%	
626190-6A	03242021-6	0.0000190%	0.00000762%	ND	ND	< 0.00001%	ND	0.08%	6.61%	93.31%	
626190-6B	03242021-6	0.00000207%	0.00000828%	ND	ND	< 0.00001%	ND	0.06%	6.03%	93.91%	
626190-6C	03242021-6	0.00000282%	0.00001127%	ND	ND	< 0.00001%	ND	0.06%	8.02%	91.92%	
626190-7A	03242021-7	0.00000205%	0.00000821%	ND	ND	< 0.00001%	ND	19.98%	8.81%	71.21%	
626190-7B	03242021-7	0.00000223%	0.00000894%	ND	ND	< 0.00001%	ND	20.13%	8.18%	71.68%	
626190-7C	03242021-7	0.00000243%	0.00000973%	ND	ND	< 0.00001%	ND	20.08%	7.88%	72.04%	
626190-8A	03242021-8	0.00000247%	0.0000988%	ND	ND	< 0.00001%	ND	16.69%	14.07%	69.25%	
626190-8B	03242021-8	0.00000263%	0.00001051%	ND	ND	< 0.00001%	ND	16.74%	11.65%	71.61%	
626190-8C	03242021-8	0.00000250%	0.0000998%	ND	ND	< 0.00001%	ND	16.69%	11.64%	71.67%	
626190-9A	03242021-9	0.0000196%	0.00000784%	ND	ND	< 0.00001%	ND	5.07%	8.11%	86.82%	
626190-9B	03242021-9	0.00000196%	0.00000782%	ND	ND	< 0.00001%	ND	5.15%	9.22%	85.64%	
626190-9C	03242021-9	0.00000251%	0.00001004%	ND	ND	< 0.00001%	ND	5.03%	5.87%	89.10%	
626190-10A	03242021-10	0.00000241%	0.0000962%	ND	ND	< 0.00001%	ND	26.89%	5.97%	67.14%	
626190-10B	03242021-10	0.00000235%	0.0000941%	ND	ND	< 0.00001%	ND	26.83%	5.59%	67.58%	
626190-10C	03242021-10	0.00000257%	0.00001029%	ND	ND	< 0.00001%	ND	26.79%	5.08%	68.13%	
626190-11A	03242021-11	0.0000199%	0.0000795%	ND	ND	< 0.00001%	ND	32.95%	5.87%	61.17%	
626190-11B	03242021-11	0.0000183%	0.0000733%	ND	ND	< 0.00001%	ND	32.91%	6.95%	60.15%	
626190-11C	03242021-11	0.0000167%	0.0000669%	ND	ND	< 0.00001%	ND	32.86%	6.87%	60.27%	

LOD = Limit of Detection

LOQ = Limit of Quantification

ND = Not Detected

PLM = Polarized Light Microscopy

TEM = Transmission Electron Microscopy

Analytical Method(s): PLM by Modified NY ELAP 198.6

TEM by Modified NY ELAP 198.4/ASTM D5756



Focused On Results. CERTIFICATE OF ANALYSIS

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> 4300 River Road College Park, MD 20740

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TEM

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Report Date: 7/23/2021 Date Sampled: Not Provided Person Submitting: Martha Schwartz

Revised: 7/27/2021 (Revision #1)

#### SUMMARY OF ANALYSIS

% Total Chrysotile & TEM LOD TEM LOQ % Chrysotile by TEM % Tremolite by TEM Tremolite by TEM % Acid AMA Sample ID Client Sample ID Asbestos Comments Using ASTM D5756 Organics Soluable Other by PLM Mass Calculation Mass Calculation Mass Calculation Mass Calculation Mass Calculation

Analyst(s): PLM

(b)(6)(b)(6)Andreas Saldivar

Technical Director: Andreas Saldivar

All results are to be considered preliminary and subject to change unless signed by the Technical Director or Deputy

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public, and these laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter not shall it be reproduced, except in full, without prior written authorization from us. Sample types, locations, and collection protocols are based upon the information provided by the persons submitting them and, unless collected by personnel of these Laboratories, we expressly disclaim any knowledge and liability for the accuracy and completeness of this information and any analytical data calcualted based upon it. Residual sample material will be discarded in accordance with the appropriate regulatory guidelines, unless otherwise requested by the client. NVLAP accreditation applies only to polarized light microscopy of bulk samples and transmission electron microscopy of AHERA air samples. This report must not be used to claim, and does not imply product certification, approval, or endorsement by NY ELAP, AIHA-LAP, NVLAP, NIST, or any agency of the Federal Government. All rights reserved. AMA Analytical Services, Inc.

# 626190-1A, 1B, 1C/03242021-1







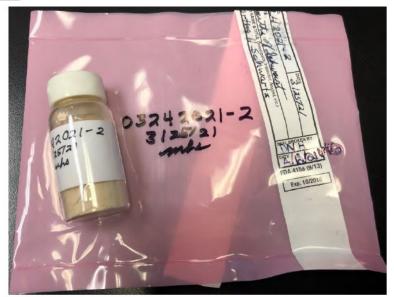








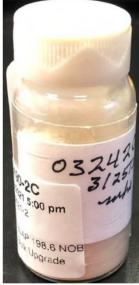
# 626190-2A, 2B, 2C/03242021-2















# 626190-3A, 3B, 3C/03242021-3







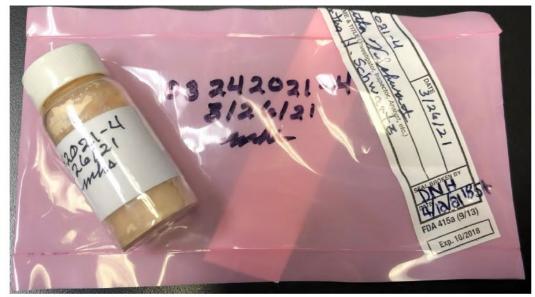




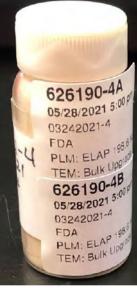




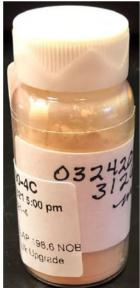
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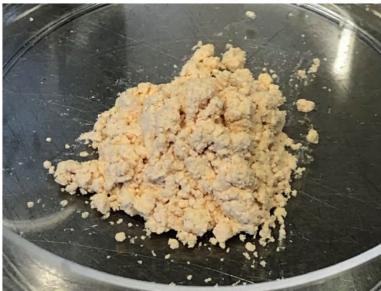




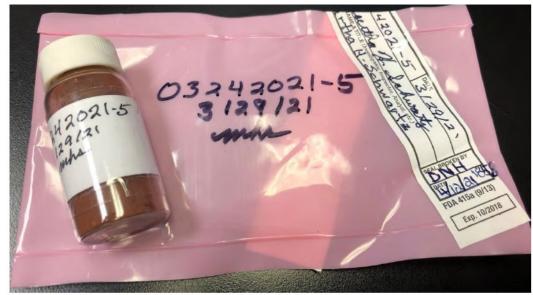








# 626190-5A, 5B, 5C/03242021-5







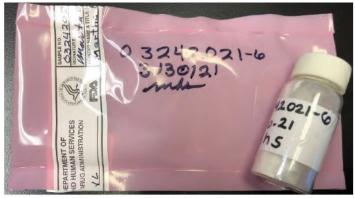




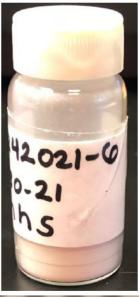




#### 626190-6A, 6B, 6C/03242021-6















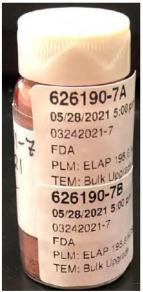


#### 626190-7A, 7B, 7C/03242021-7

















#### 626190-8A, 8B, 8C/03242021-8



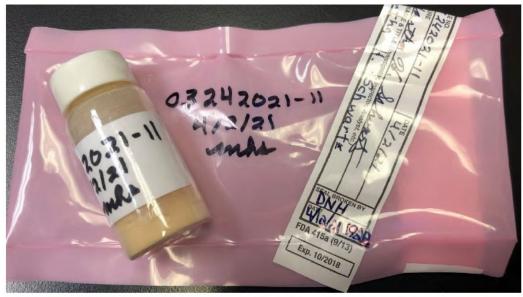
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# 626190-10A, 10B, 10C/03242021-10

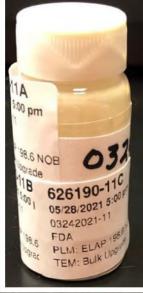


# 626190-11A, 11B, 11C/03242021-11















Re: FDA Office of Cosmetics & Colors Case Narrative for COC 626190

#### Sample Preparation

Samples were gravimetrically reduced and filtered by (b)(6) on: May 10, 2021 through May 13, 2021 for samples 626190-1A through 626190-4C and NB21-312; on May 14, 2021 through May 18, 2021 for samples 626190-8C, 626190-12DQC, 626190-13RQC and NB21-325; and on May 19, 2021 through May 20, 2021 for samples 626190-9A through 626190-11C and NB21-329. PLM slide preparations were made by (b)(6) on May 21, 2021. TEM grid preparations were made by: (b)(6) on May 13, 2021 for samples 626190-1A through 626190-4C and NB21-312; (b)(6) on May 19, 2021 for samples 626190-5A through 626190-8C, 626190-12DQC, 626190-13RQC and NB21-325; and (b)(6) on May 20, 2021 and for samples 626190-9A through 626190-11C and NB21-329. Sample preparation consisted of the following steps:

- 1) Label and weigh two 8mL glass vials for each sample in the set one vial for the PLM preparation and one vial for the TEM preparation.
- 2) Weigh out 0.1 to 0.8-grams of material and place in the corresponding 8mL glass vial. Record weight.
- 3) Burn samples at 480° C for at least 12-hours.
- 4) Record Post-Ash weight.
- 5) Treat ashed sample with reagent grade hydrochloric acid.
- 6) Filter acid reduced material with a pre-weighed disposable filtration apparatus onto a 47mm 0.4 $\mu$ m PolyCarbonate filter.
- 7) Place disposable filtration apparatus with filter into drying oven for 3 hours and then record Post-Acid Reduced weight.
- 8) Make four PLM slide preparations from the PLM residue for each sample in 1.550 dispersion oil. Make additional preparations in 1.605, 1.625, 1.680 and 1.700 dispersion oil(s) as necessary for particle identification.
- 9) Weigh a portion of the material from the TEM residue and place it into the corresponding pre-weighed 100mL iar.
- 10) Fill the 100mL jar with deionized water
- 11) Sonicate the jar for ~5-minutes.
- 12) Filter 0.1mL to 2mL of the solution onto a 47mm 0.22µm MCE filter.
- 13) Dry the filter for ~10-minutes then collapse, carbon coat, and place on a 3 TEM grids.

TEM grid preparations were examined prior to analysis and were rejected if they met the following criteria:

- 1) Less than 50% of the carbon coating was intact
- 2) The grid was too dark due to incomplete dissolution of the filter
- 3) Heavy particulate loading in excess of 25%
- 4) Light particulate loading below 10%
- 5) Uneven distribution of particulate

#### Problems Encountered During Preparation & Resolutions:

No problems were encountered during sample preparation. All gravimetric data was consistent among each group of aliquots and all TEM grid preparations were deemed acceptable for analysis.

#### **PLM Analysis**

Analysis was performed in accordance with NY ELAP 198.6 protocols. The analysis was conducted using an Olympus BH-2 polarized light microscope (PLM) equipped with a dispersion staining objective. All four slide preparations for each aliquot were examined; each slide preparation consisted of two (2) coverslips for a total of eight (8) coverslips. 400-point count was performed for those samples on which asbestos was observed. If no asbestos was detected on any of the slides, the percentage of fibrous components was determined by visual estimation. The results of this analysis are detailed below in the *Discussion and Interpretation of Analytical Findings* section for each individual sample.

#### **Point Counting**

If asbestos was observed on the slide preparations, the amount of asbestos was quantified using point count techniques. Point counting is form of quantifying PLM samples. One of the oculars of each PLM microscope is etched with a crosshair. When point counting, whatever is under the crosshair is counted as one point of whatever the material is. Four (4) slide preparations with a total of eight (8) coverslips are prepared for each sample. The microscope mechanical



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stage is used to randomly move the slide. After each movement, whatever is under the crosshair, provided the point is not empty, is counted. Fifty (50) non-empty points are counted on each of the eight (8) coverslips for a total of four hundred (400) points. The total asbestos points counted are divided by the total points counted to calculate the percentage.

#### Example:

11 points of asbestos were counted out of the 400 total points

Slide percentage = (11pts/400pts) \* 100%

Slide percentage = 2.75%

This number is not the final asbestos percentage. To calculate the final percentage, this number must be corrected to account for the material lost during gravimetric reduction preparation. See the *Calculations* section below for additional details.

#### **TEM Analysis**

Analysis was performed in accordance with modified NY ELAP Method 198.4 protocols. The analysis was performed using JEOL JEM-100CX II and JEOL JEM-100CX transmission electron microscopes (TEM) equipped with Thermo Fisher NSS System 7 Energy Dispersive X-Ray Analyzers (EDXA), at magnifications of 19,000x. All TEM scopes are equipped with a Selective Area Electron Diffraction (SAED) setting that allows the operator to view the diffraction pattern of any mineral substance. Twenty (20) grid openings over two (2) grids were examined for each aliquot.

Modifications to the NY ELAP 198.4 Method were:

- 1) The residue was not placed in alcohol and prepared using the quick drop method. To obtain a more uniform preparation, the residue was placed in a jar and filled with 100mL of deionized water. The jar was sonicated, and a portion of the solution was filtered onto a 47mm 0.22µm MCE filter.
- 2) Any amphibole or chrysotile particle(s) observed were not quantified by visual estimation. The length and width of the observed particle(s) were measured, and the mass of each amphibole and chrysotile particle was calculated using the ASTM D5756 method.
- 3) All particles identified as amphibole were included with the counts/concentrations, regardless of size and aspect ratio.

The results of this analysis are detailed below in the *Discussion and Interpretation of Analytical Findings* section for each individual sample.

#### Calculations

TEM ASTM D5756 Mass: Gravimetric Reduction Percentages:

 $M = \pi/4 L * W^2 * D * 10^{-12}$  Organic: ((W1 - W2) \* 100/W1 Where: M: Mass Acid Soluble: ((W2 - W3) \* 100/W1

L: Length Other\* Percent: ((W3/W1) \* 100) – Calculated Asbestos %
W: Width \*Other is defined as the non-asbestos, inorganic, acid insoluble portion of the sample

D: Density Where: W1: Weight of sample prior to ashing/acid wash

W2: Weight of sample after ashing

W3: Weight of sample after acid treatment

Asbestos Percent Calculation:

TEM PLM

 $EFA(mm^2) * 100ml * MA(g) * RW(g)$  (ASB \* W3)/W1

VF(ml) \* IW(g) \* AA(mm<sup>2</sup>) \* RJ(g)

(The calculated value is then multiplied by 100 to convert it to percent)

Where: EFA: Effective filter area Where: W1: Weight of sample prior to ashing/acid wash

MA: Mass of asbestos W3: Weight of sample after acid treatment

RW: Weight of residue ASB: Calculated Point Count Result

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VF: Volume filtered

IW: Initial weight of the sample

AA: Area analyzed

RJ: Weight of residue placed into the jar

Note: All reported concentrations were calculated using the gravimetric data from the TEM preparations.

#### **Limit of Detection and Quantification**

We used the mass of a  $0.5 \times 0.04$ -micron tremolite fiber as the basis for our calculations. Limit of detection (LOD) was defined as 1 fiber and limit of quantification (LOQ) was defined as 4 fibers.

#### Discussion and Interpretation of Analytical Findings:

626190-1A, 1B, 1C/Client Sample: 03242021-1

#### PLM

All three aliquots of sample 03242021-1 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-1A	No Asbestos Detected
626190-1B	No Asbestos Detected
626190-1C	No Asbestos Detected

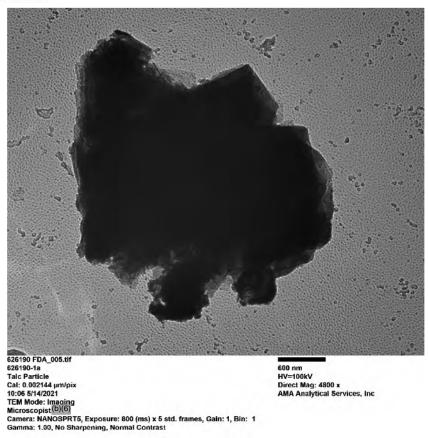
#### TEM

(b)(6) analyzed aliquot 1A May 14, 2021. Andreas Saldivar analyzed aliquots 1B and 1C on May 14, 2021. The primary particles observed were talc and mica; silica spheres and iron particles were also observed along with a few talc fibers/ribbons, silica particles, and particles containing magnesium, aluminum, and silicon. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-1A	No Asbestos Detected
626190-1B	No Asbestos Detected
626190-1C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

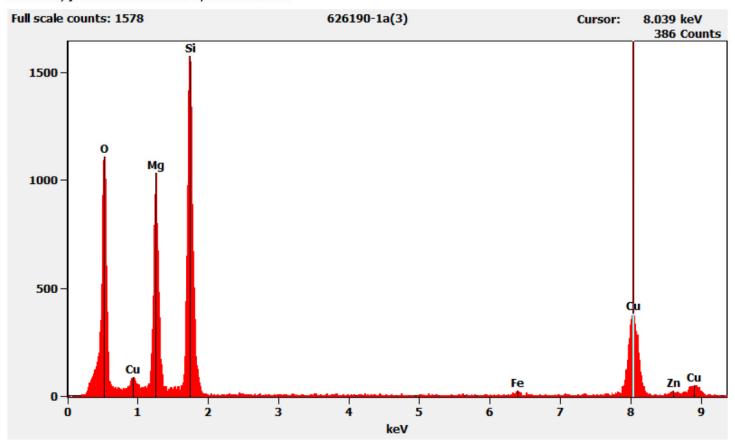
# Sample 626190-1A, Talc Particle



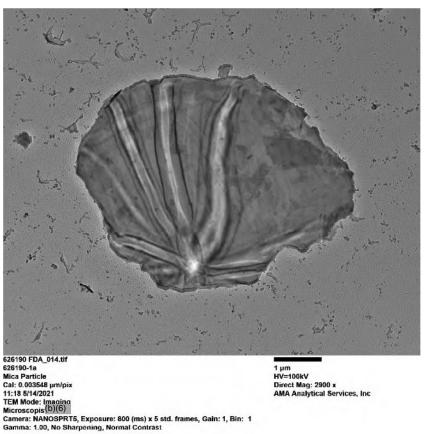
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



# Chemistry from the Talc Particle pictured above



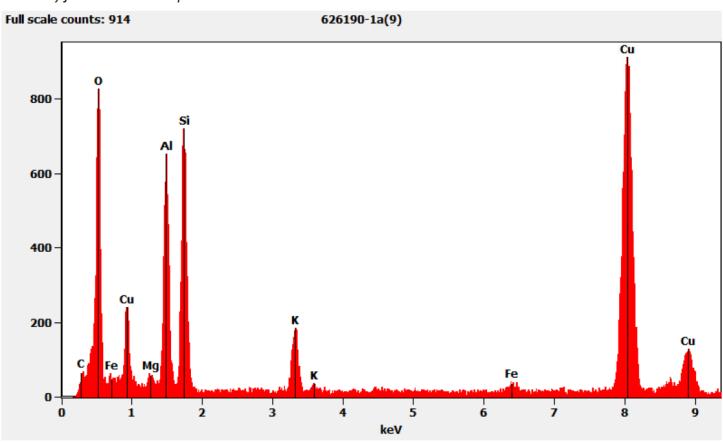
Sample 626190-1A, Mica Particle



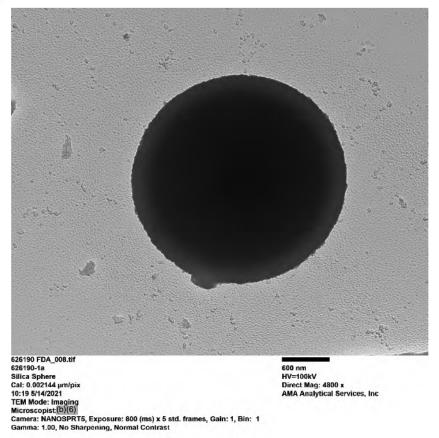
# Hexagonal Diffraction Pattern from the Mica Particle pictured above



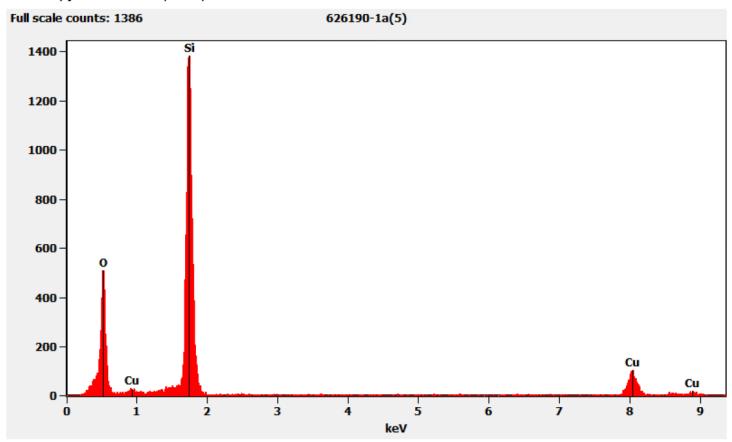
# Chemistry from Mica Particle pictured above



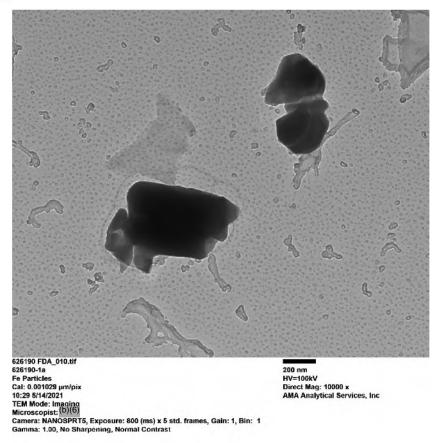
# 626190-1A, Silica Sphere



# Chemistry from the Silica Sphere pictured above



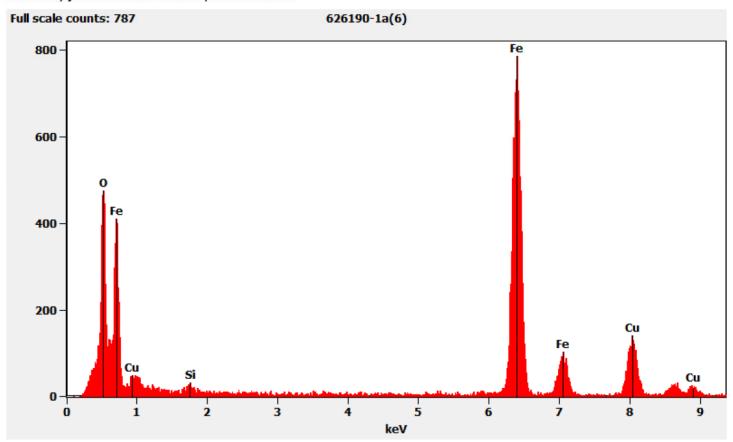
# 626190-1A, Iron Particles



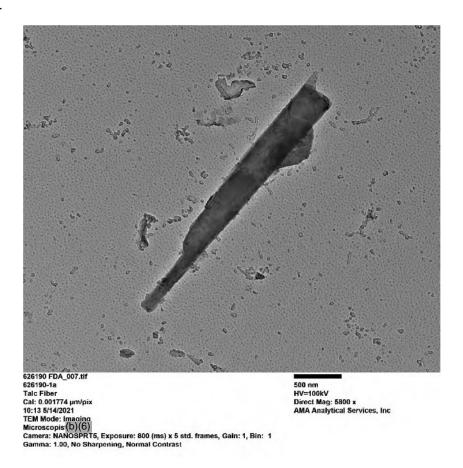
# Diffraction Pattern from the Iron Particles pictured above



# Chemistry from the Iron Particles pictured above



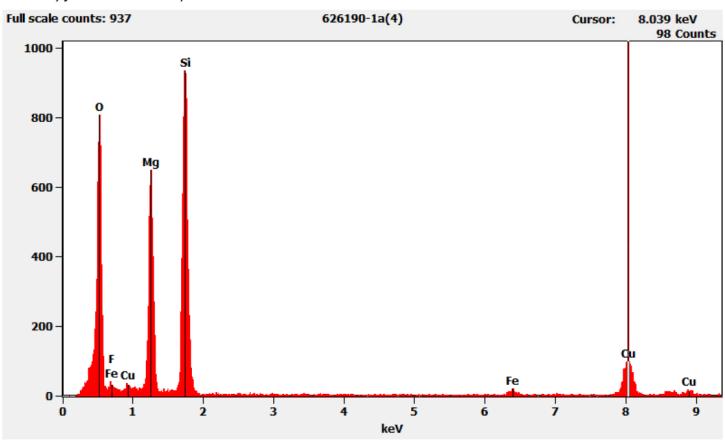
626190-1A, Talc Fiber



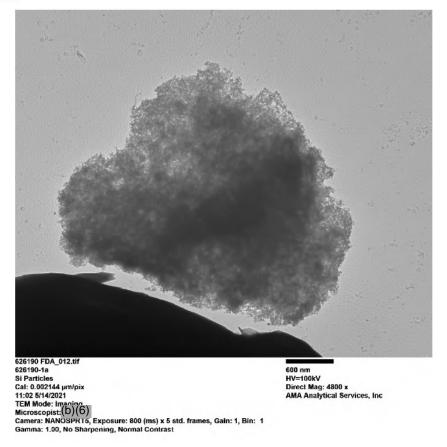
# Hexagonal Diffraction Pattern from the Talc Fiber pictured above



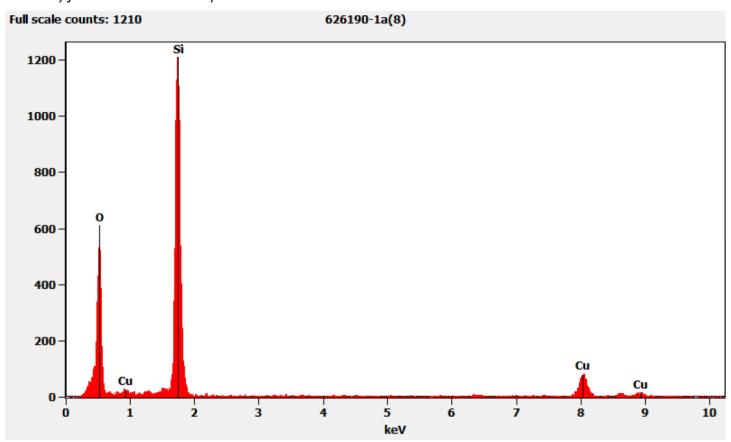
# Chemistry from the Talc Fiber pictured above



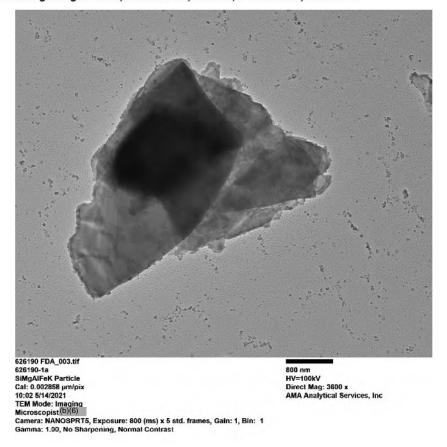
# 626190-1A, Silica Particles



# Chemistry from the Silica Particles pictured above



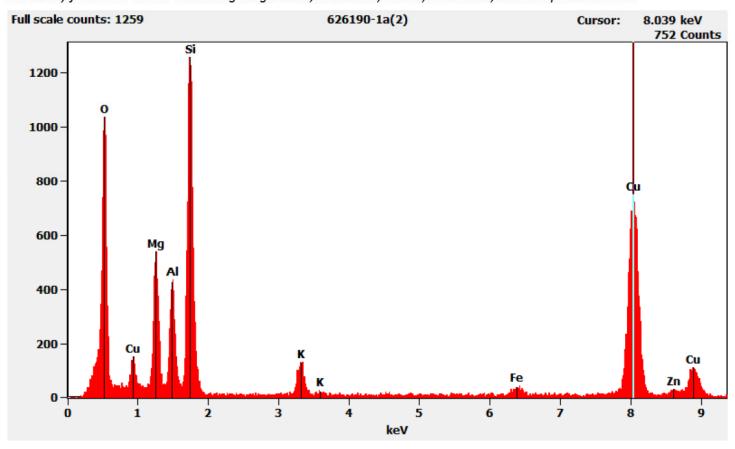
626190-1A, Particle containing Magnesium, Aluminum, Silicon, Potassium, and Iron



Hexagonal Diffraction Pattern from the Particle containing Magnesium, Aluminum, Silicon, Potassium, and Iron pictured above



Chemistry from the Particle containing Magnesium, Aluminum, Silicon, Potassium, and Iron pictured above



#### 626190-2A, 2B, 2C/Client Sample: 03242021-2

#### PLM

All three aliquots of sample 03242021-2 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-2A	No Asbestos Detected
626190-2B	No Asbestos Detected
626190-2C	No Asbestos Detected

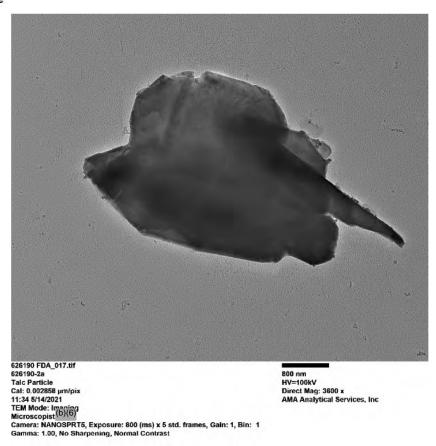
TEM

(b)(6) analyzed aliquot 2A on May 14, 2021 and aliquot 2B on May 17, 2021. (b)(6) analyzed aliquot 2C on May 19, 2021. The primary particle observed was talc; talc fibers/ribbons and iron particles were also observed along with a few calcium particles. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-2A	No Asbestos Detected
626190-2B	No Asbestos Detected
626190-2C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

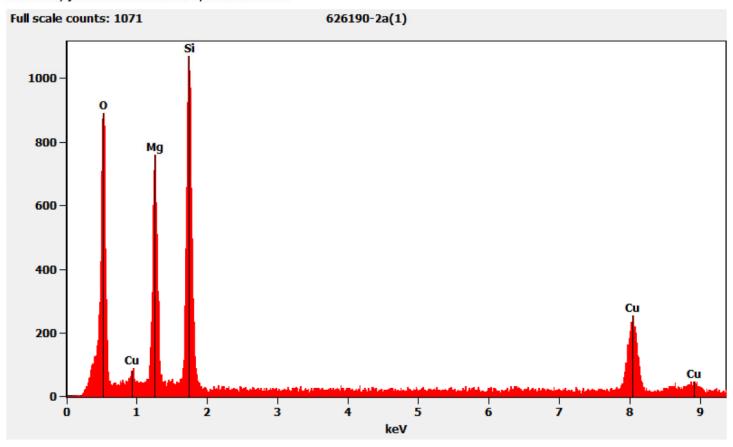
# 626190-2A, Talc Particle



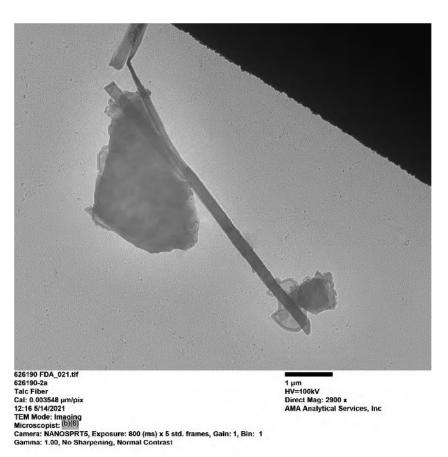
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



# Chemistry from the Talc Particle pictured above



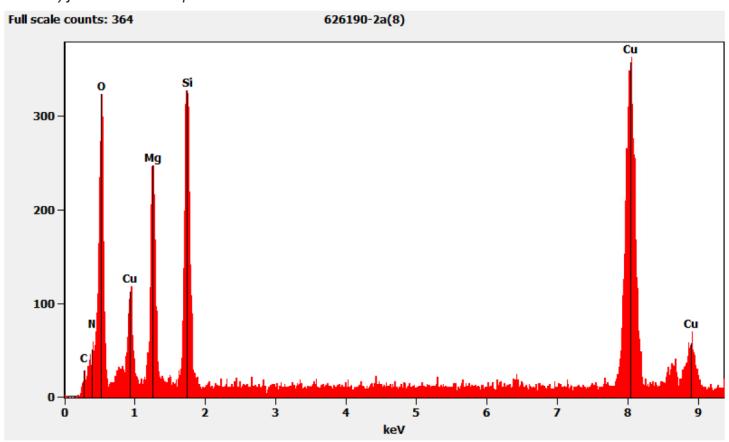
626190-2A, Talc Fiber



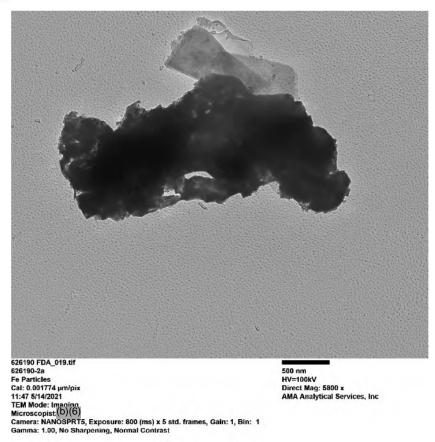
# Hexagonal Diffraction Pattern from the Talc Fiber pictured above



# Chemistry from the Talc Fiber pictured above



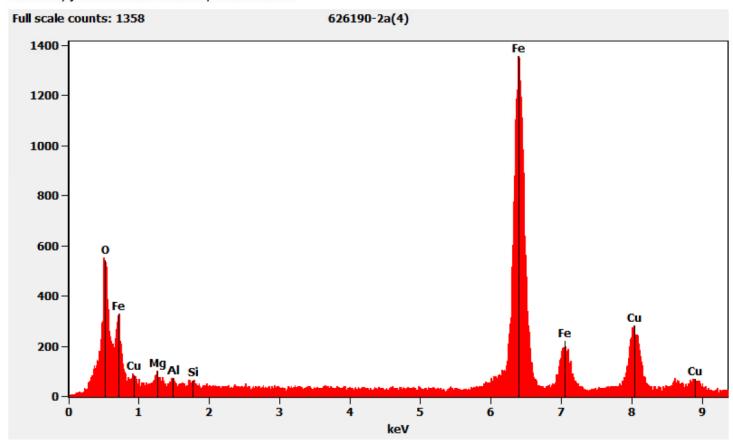
# 626190-2A, Iron Particles



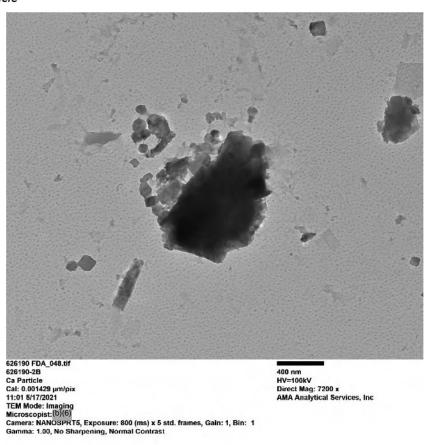
# Diffraction Pattern from the Iron Particles pictured above



# Chemistry from the Iron Particles pictured above



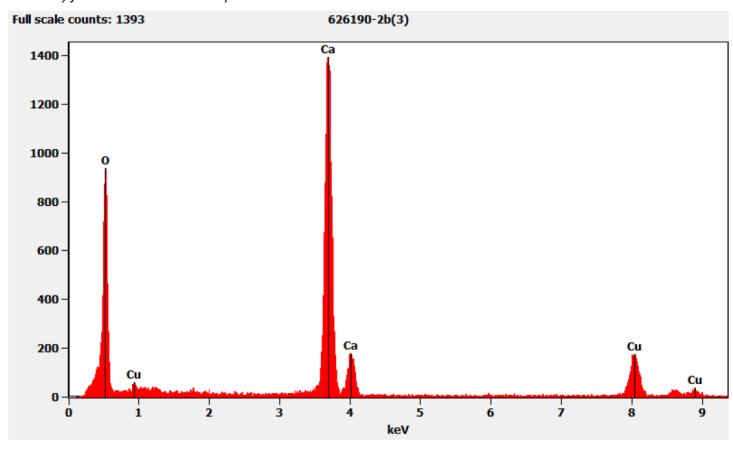
626190-2B Calcium Particle



# Diffraction Pattern from the Calcium Particle pictured above



# Chemistry from the Calcium Particle pictured above



#### 626190-3A, 3B, 3C/Client Sample: 03242021-3

**PLM** 

All three aliquots of sample 03242021-3 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-3A	No Asbestos Detected
626190-3B	No Asbestos Detected
626190-3C	No Asbestos Detected

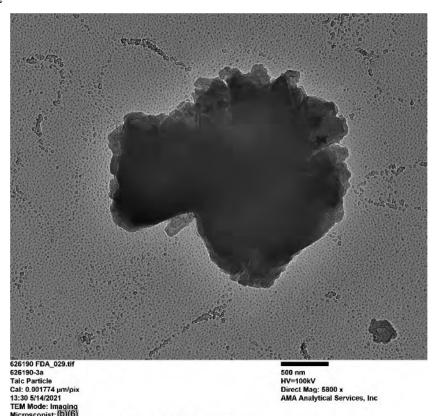
TEM

(b)(6) analyzed aliquot 3A on May 14, 2021 and aliquot 3B on May 17, 2021. (b)(6) analyzed aliquot 3C on May 19, 2021. The primary particles observed were talc and mica; several iron particles were also observed along with silica spheres and a few talc ribbons/fibers. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-3A	No Asbestos Detected
626190-3B	No Asbestos Detected
626190-3C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

#### 626190-3A, Talc Particle



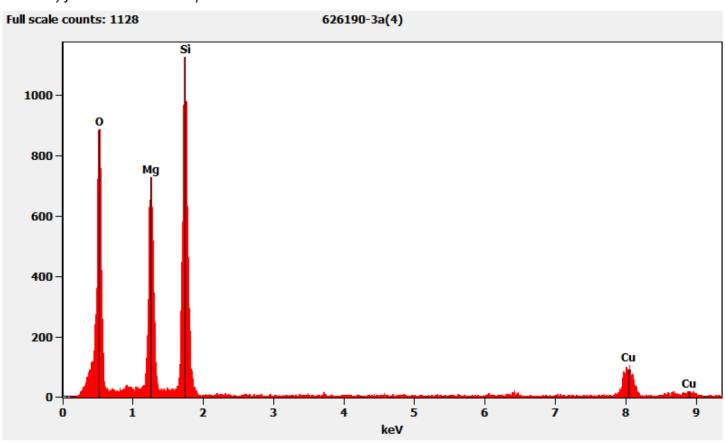
era: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1

na: 1.00. No Sharpening, Normal Contrast

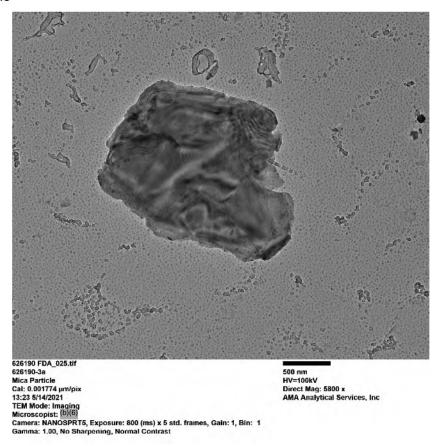
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



# Chemistry from the Talc Particle pictured above



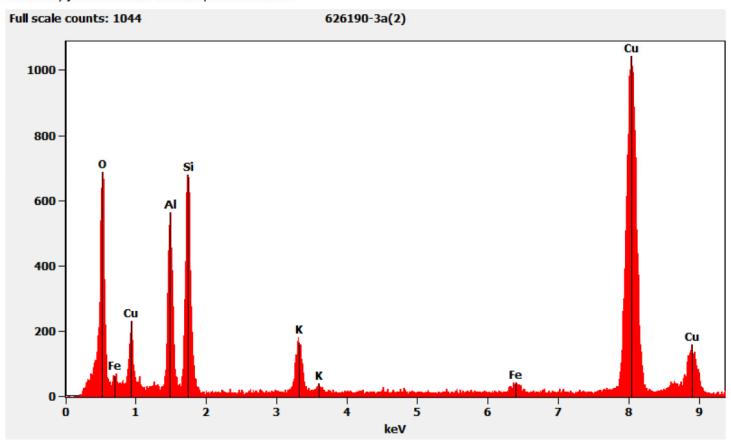
# 626190-3A, Mica Particle



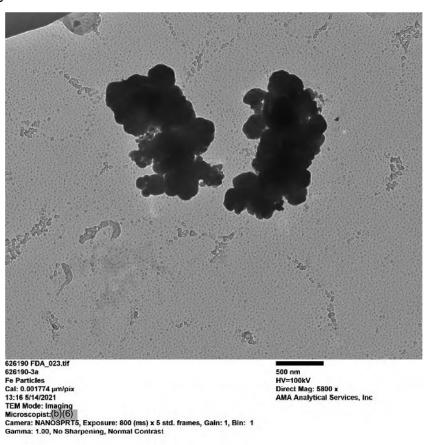
# Hexagonal Diffraction Pattern from the Mica Particle pictured above



# Chemistry from the Mica Particle pictured above



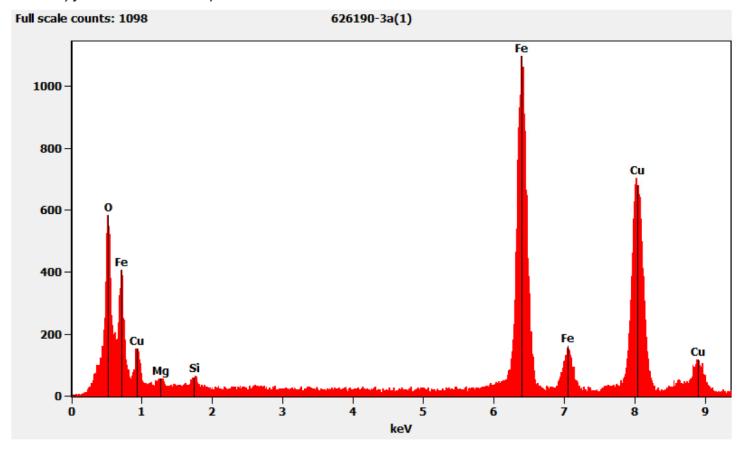
626190-3A, Iron Particles



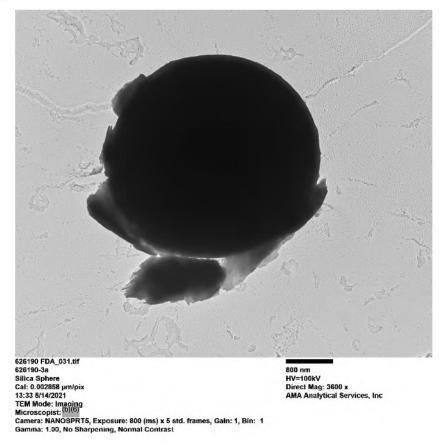
# Diffraction Pattern from the Iron Particles pictured above



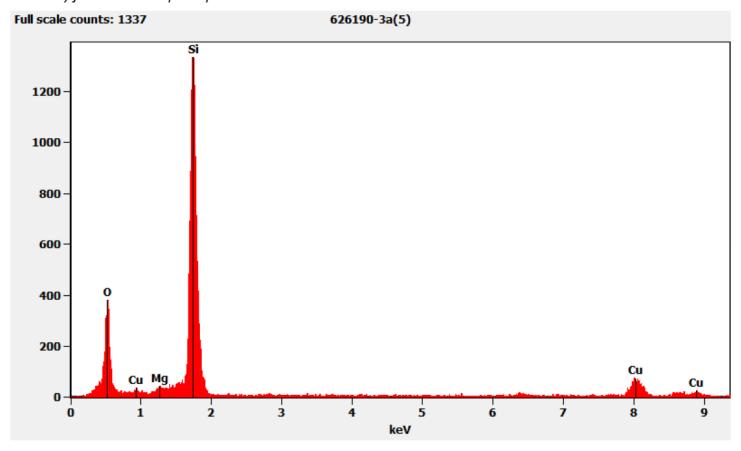
## Chemistry from the Iron Particles pictured above



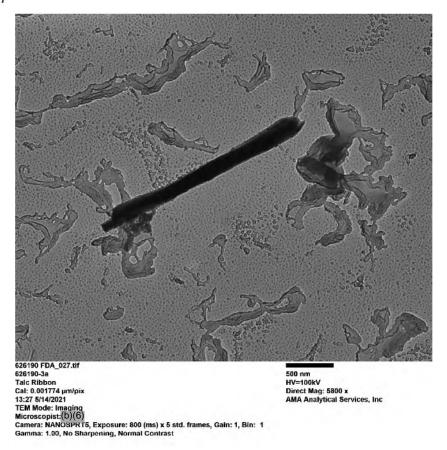
## 626190-3A, Silica Sphere



## Chemistry from the Silica Sphere pictured above



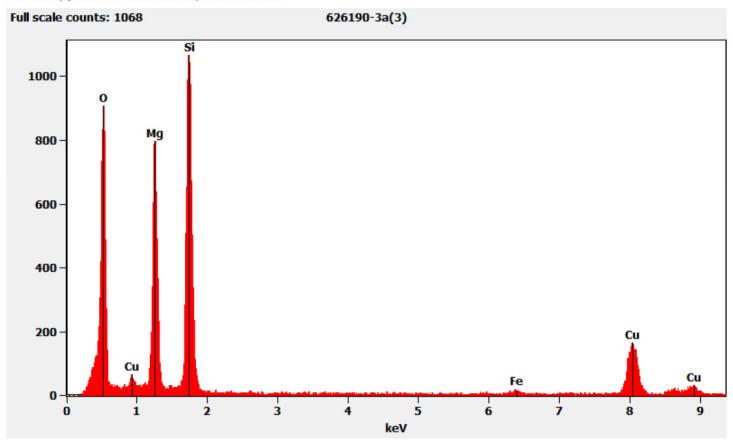
## 626190-3A, Talc Ribbon



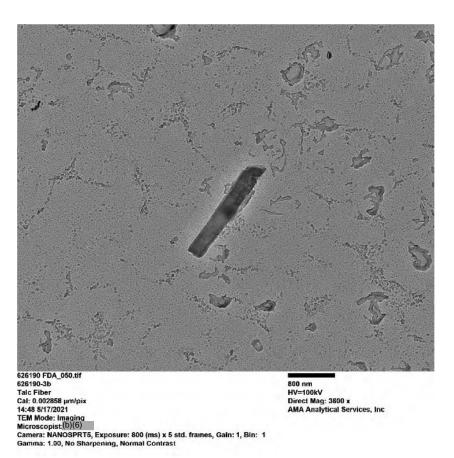
## Diffraction Pattern from the Talc Ribbon pictured above



## Chemistry from the Talc Ribbon pictured above



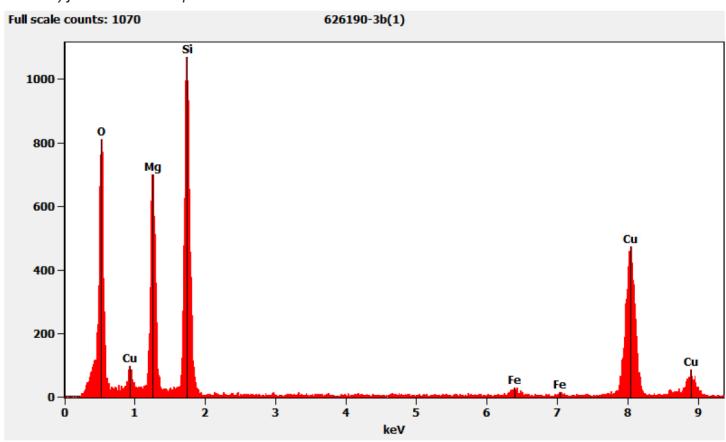
626190-3B, Talc Fiber



## Hexagonal Diffraction Pattern from the Talc Fiber pictured above



## Chemistry from the Talc Fiber pictured above



#### 626190-4A, 4B, 4C/Client Sample: 03242021-4

#### **PLM**

All three aliquots of sample 03242021-4 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

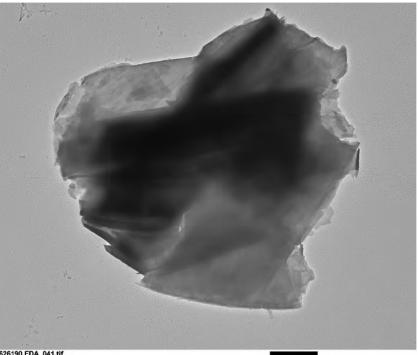
626190-4A	No Asbestos Detected
626190-4B	No Asbestos Detected
626190-4C	No Asbestos Detected

(b)(6) analyzed aliquot 4A on May 14, 2021. Andreas Saldivar analyzed aliquot 4B on May 19, 2021 and aliquot 4C on May 20, 2021. The primary particles observed were talc and mica; iron and particles containing magnesium, aluminum, and silicon were also observed along with a few talc fibers/ribbons. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-4A	No Asbestos Detected
626190-4B	No Asbestos Detected
626190-4C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

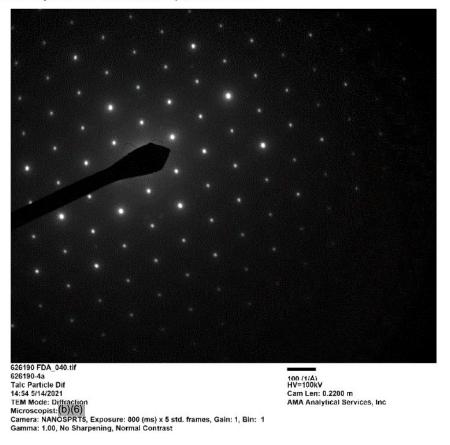
#### 626190-4A, Talc Particle



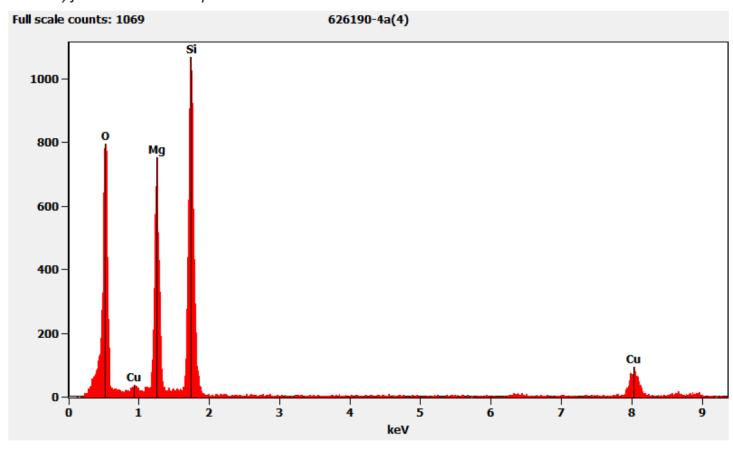
626190 FDA\_041.tif 626190-4a Talc Particle Cal: 0.003548 µm/pix 14:55 5/14/2021 TEM Mode: Imaging Microscopist(b)(6)

Microscopist(<u>U)/(0)</u> Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00. No Sharpening, Normal Contrast 1 µm HV=100kV Direct Mag: 2900 x AMA Analytical Services, Inc

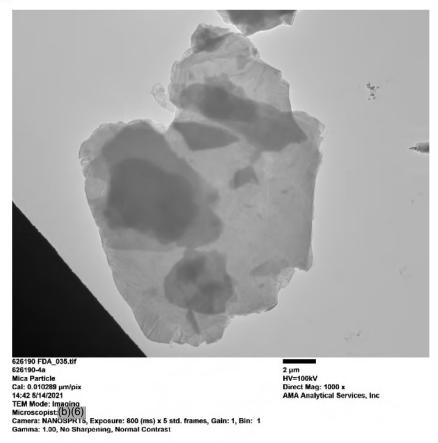
## Hexagonal Diffraction Pattern from the Talc Particle pictured above



## Chemistry from the Talc Particle pictured above



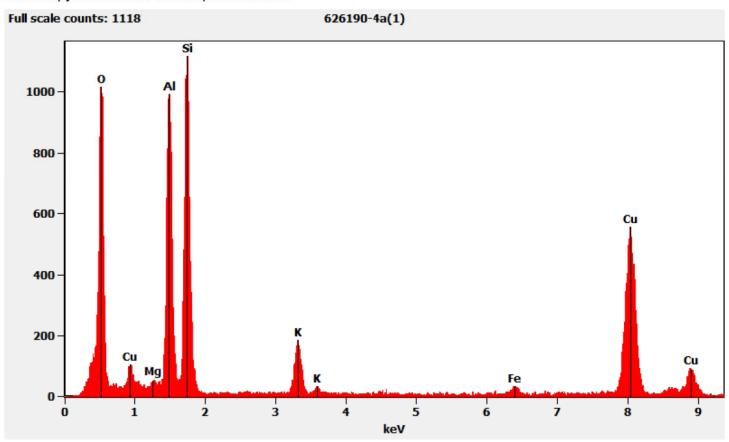
## 626190-4A, Mica Particle



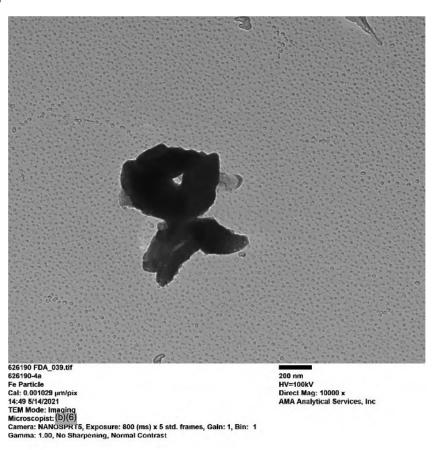
## Hexagonal Diffraction Pattern from the Mica Particle pictured above



## Chemistry from the Mica Particle pictured above



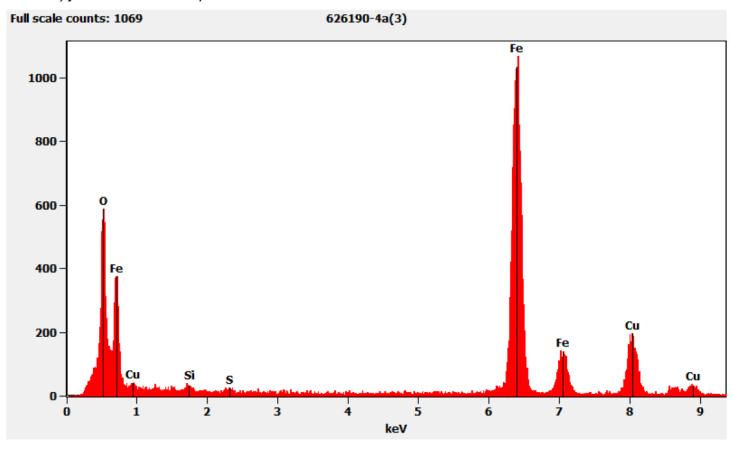
626190-4A, Iron Particle



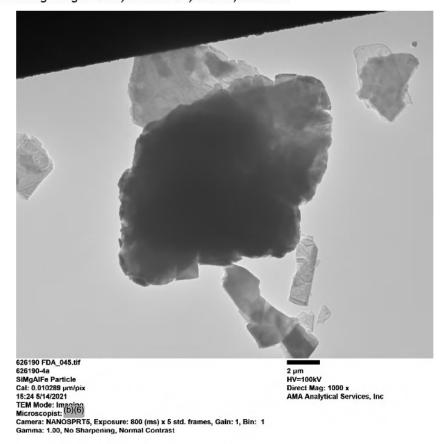
## Diffraction Pattern from the Iron Particle pictured above



## Chemistry from the Iron Particle pictured above



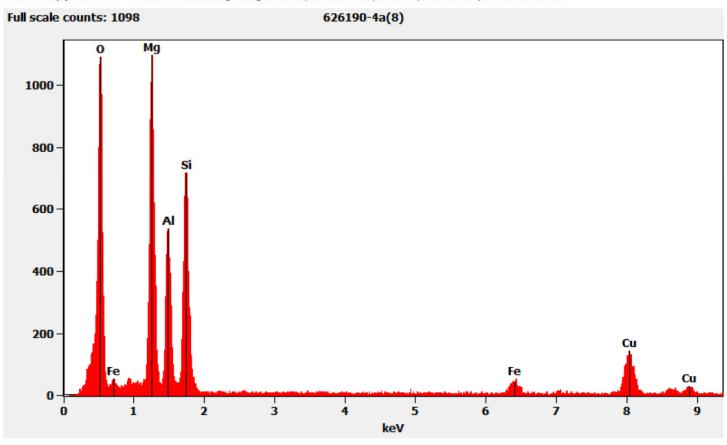
# 626190-4A, Particle containing Magnesium, Aluminum, Silicon, and Iron



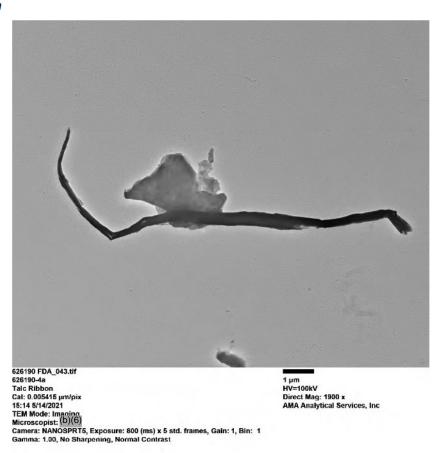
## Diffraction Pattern from the Particle containing Magnesium, Aluminum, Silicon, and Iron pictured above



Chemistry from the Particle containing Magnesium, Aluminum, Silicon, and Iron pictured above



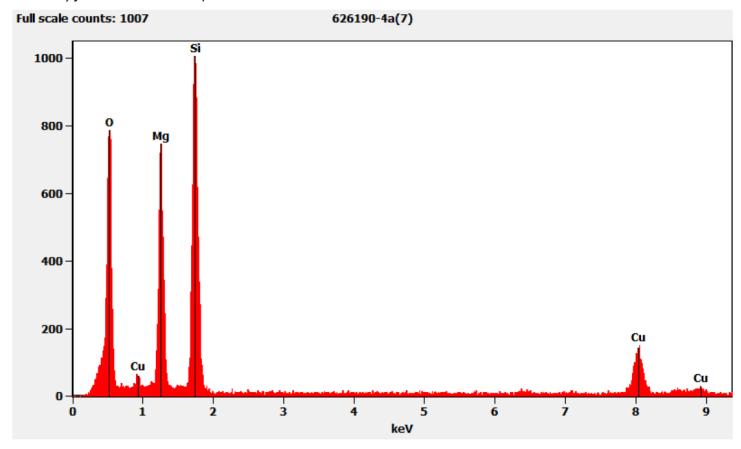
626190-4A, Talc Ribbon



## Diffraction Pattern from the Talc Ribbon pictured above



## Chemistry from the Talc Ribbon pictured above



#### 626190-5A, 5B, 5C/Client Sample: 03242021-5

#### **PLM**

All three aliquots of sample 03242021-5 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-5A	No Asbestos Detected
626190-5B	No Asbestos Detected
626190-5C	No Asbestos Detected

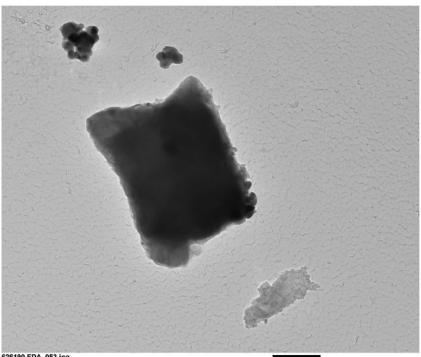
#### TEM

(b)(6) analyzed aliquot 5A on May 19, 2021. Andreas Saldivar analyzed aliquots 5B and 5C on May 20, 2021. The primary particle observed was mica; several titanium and iron particles were also observed along with talc particles, titanium fibers, silica particles and silica spheres. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-5A	No Asbestos Detected
626190-5B	No Asbestos Detected
626190-5C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

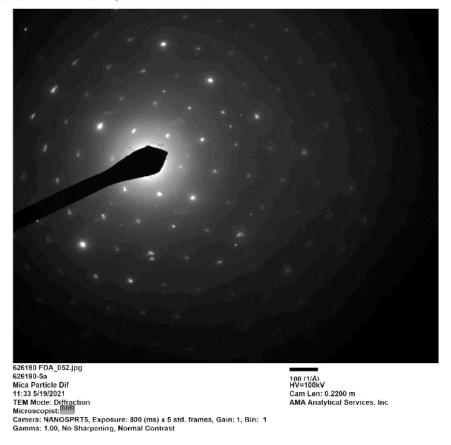
#### 626190-5A, Mica Particle



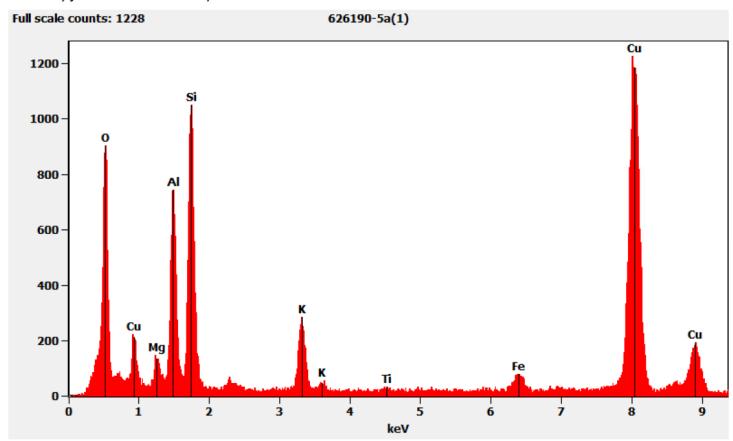
626190 FDA\_053.jpg 626190-5a Mica Particle Cal: 0.002144 µm/pix 11:34 5/19/2021 TEM Mode: Imaging Microscopist(b)(6)

Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast 600 nm HV=100kV Direct Mag: 4800 x AMA Analytical Services, Inc

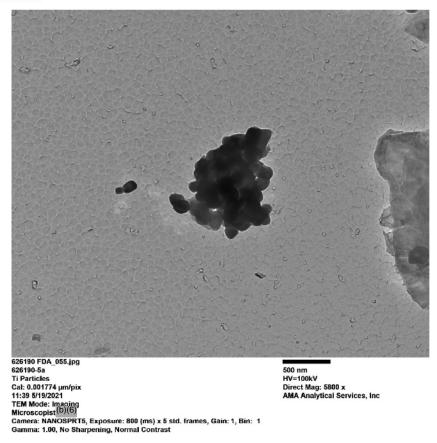
# Diffraction Pattern from the Mica Particle pictured above



## Chemistry from the Mica Particle pictured above



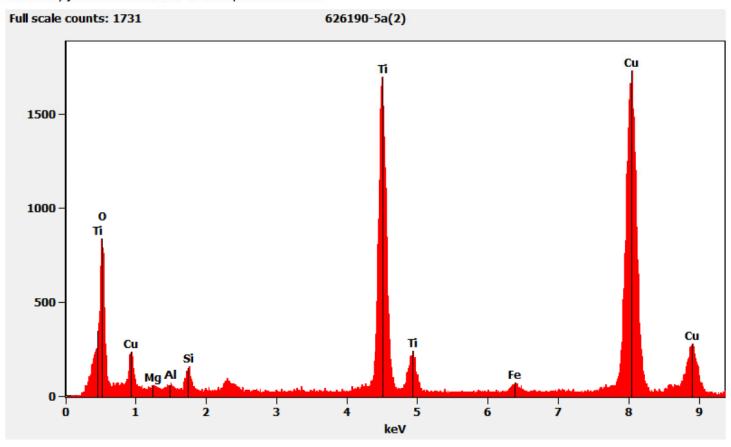
## 626190-5A, Titanium Particles



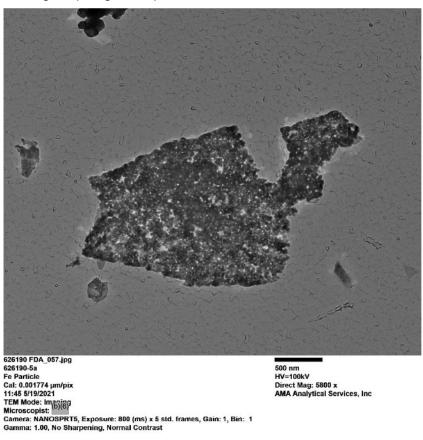
# Diffraction Pattern from the Titanium Particles pictured above



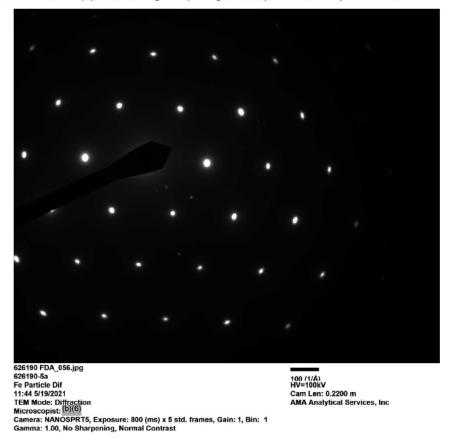
## Chemistry from the Titanium Particles pictured above



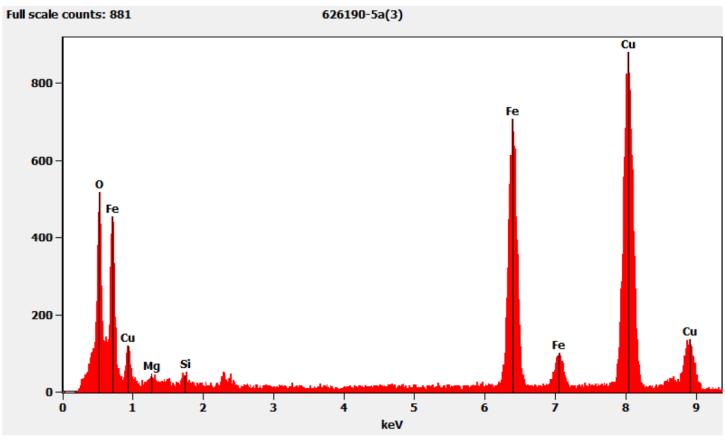
626190-5A, Particle(s) containing Iron, Magnesium, and Silicon



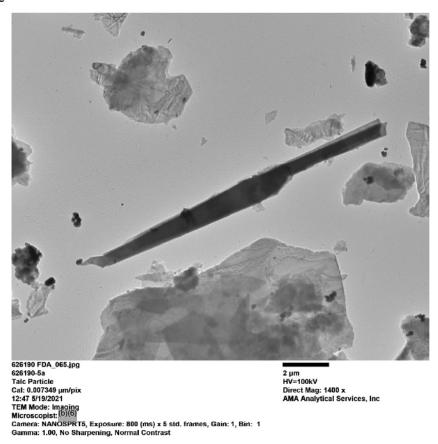
Diffraction Pattern from the Particle(s) containing Iron, Magnesium, and Silicon pictured above



# Chemistry from the Particle(s) containing Iron, Magnesium, and Silicon pictured above



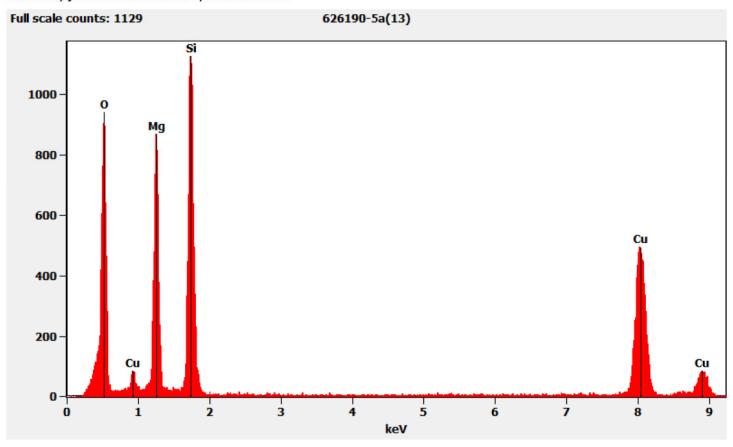
## 626190-5A, Talc Particle



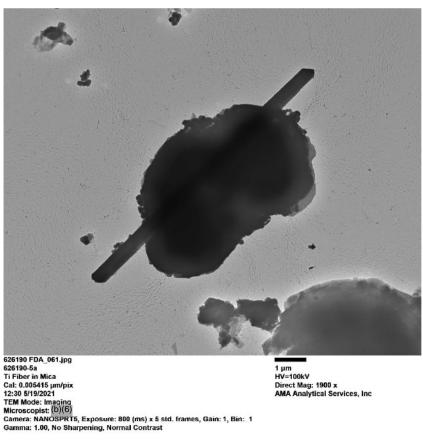
## Hexagonal Diffraction Pattern from the Talc Particle pictured above



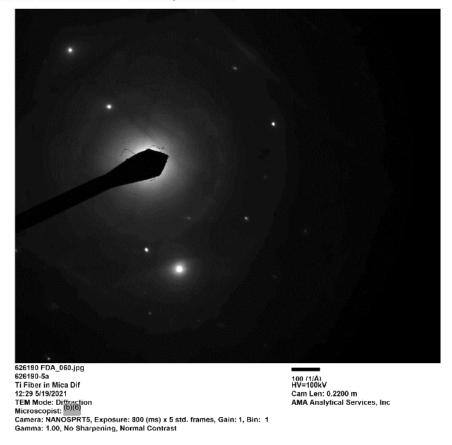
## Chemistry from the Talc Particle pictured above



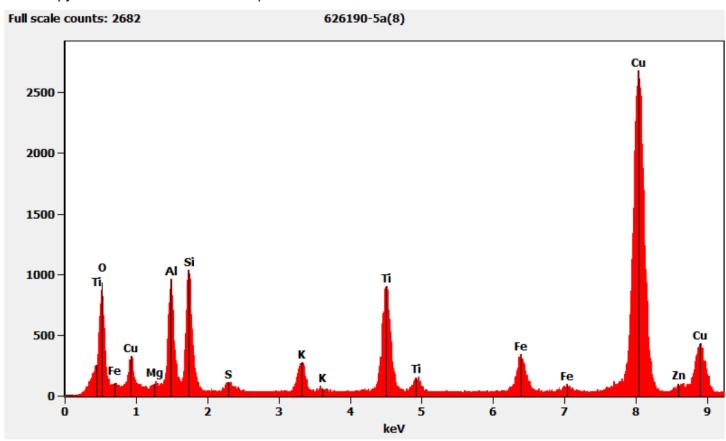
626190-5A, Titanium Fiber in Mica



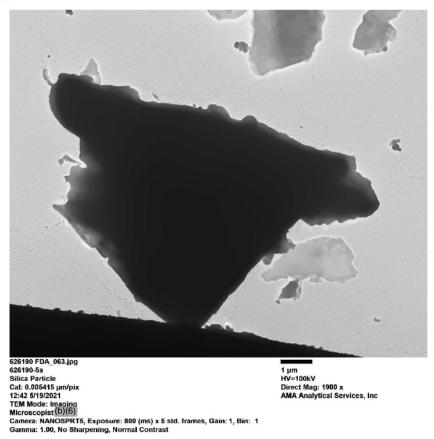
## Diffraction Pattern from the Titanium Fiber in Mica pictured above



## Chemistry from the Titanium Fiber in Mica pictured above



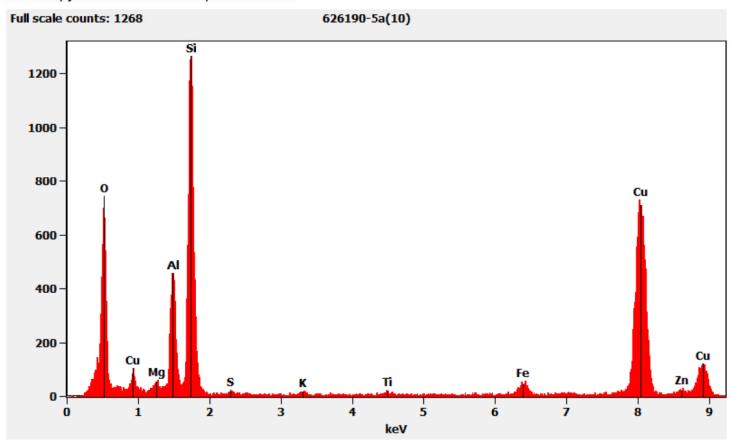
#### 626190-5A, Silica Particle



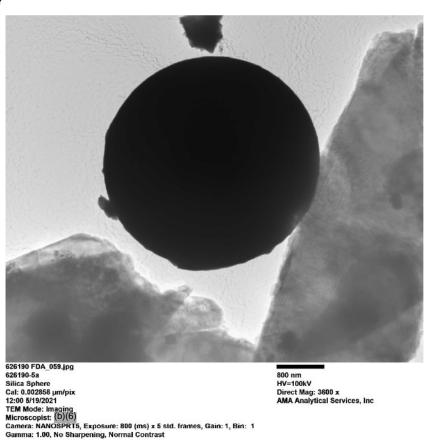
## Diffraction Pattern from the Silica Particle pictured above



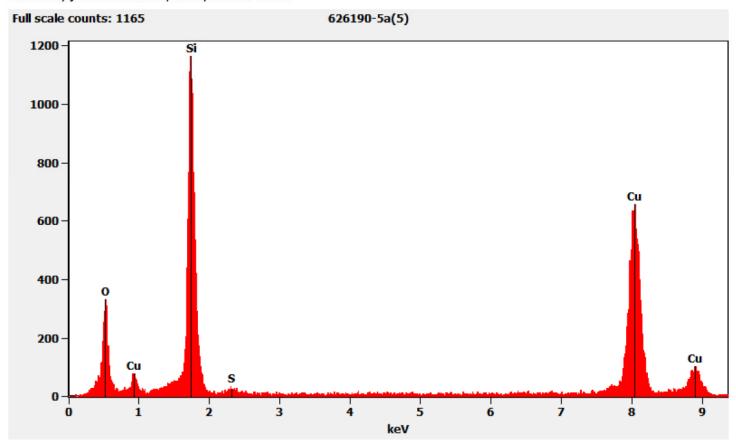
## Chemistry from the Silica Particle pictured above



626190-5A, Silica Sphere



Chemistry from the Silica Sphere pictured above



#### 626190-6A, 6B, 6C/Client Sample: 03242021-6

#### **PLM**

All three aliquots of sample 03242021-6 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-6A	No Asbestos Detected
626190-6B	No Asbestos Detected
626190-6C	No Asbestos Detected

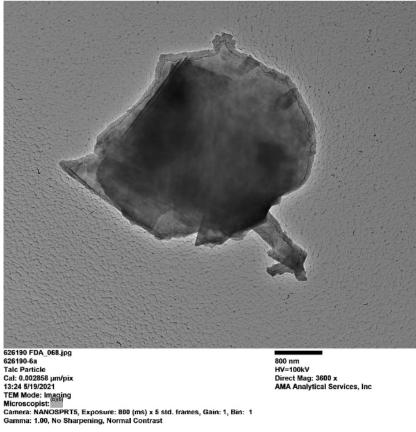
#### TEM

(b)(6) analyzed aliquot 6A on May 19, 2021 and aliquot 6B on May 20, 2021. (b)(6) analyzed aliquot 6C on May 21, 2021. The primary particle observed was talc; talc fibers/ribbons were also observed along with a few particles containing magnesium, aluminum, and silicon and calcium particles. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-6A No Asbestos Detected 626190-6B No Asbestos Detected 626190-6C No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

## 626190-6A, Talc Particle



## Hexagonal Diffraction Pattern from the Talc Particle pictured above

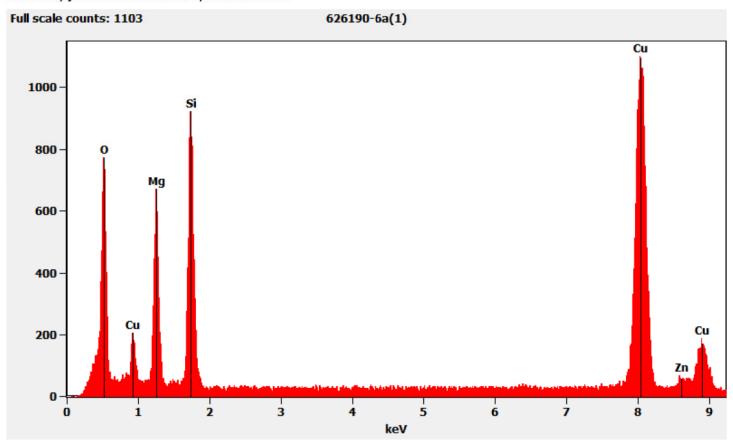


626190 FDA\_067.jpg 626190-6a Talc Particle Dif 13:23 5/19/2021

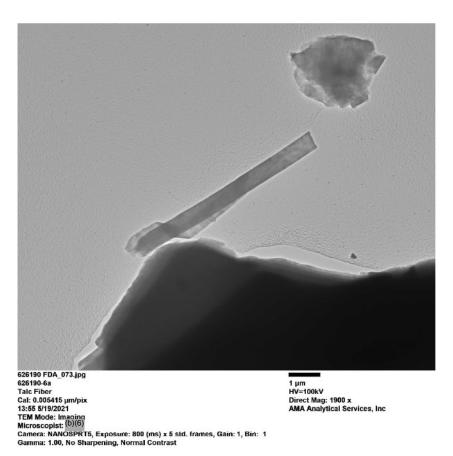
TEM Mode: Diffraction Microscopist: [0](6) Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

100 (1/A) HV=100kV Cam Len: 0.2200 m AMA Analytical Services, Inc

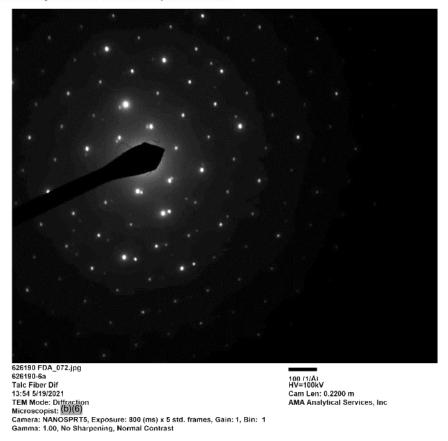
## Chemistry from the Talc Particle pictured above



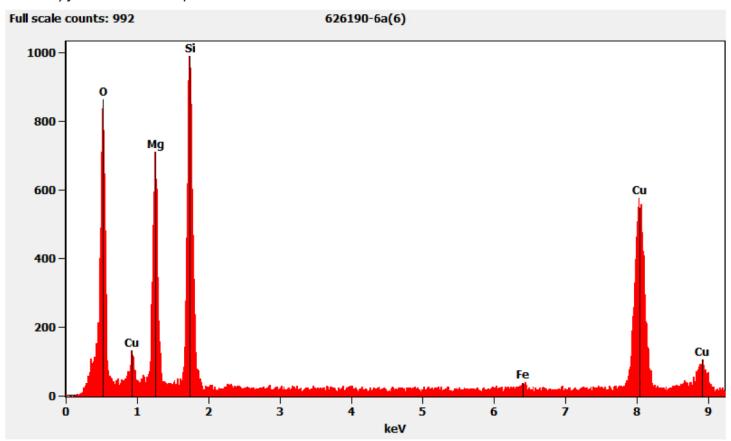
626190-6A, Talc Fiber



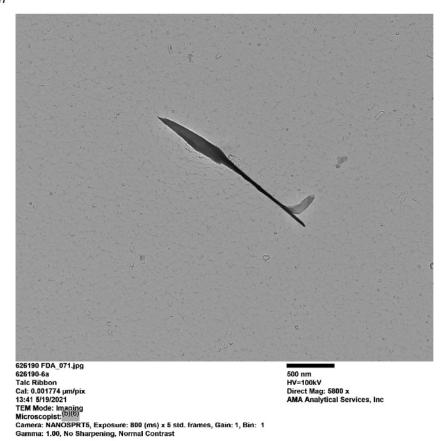
## Hexagonal Diffraction Pattern from the Talc Fiber pictured above



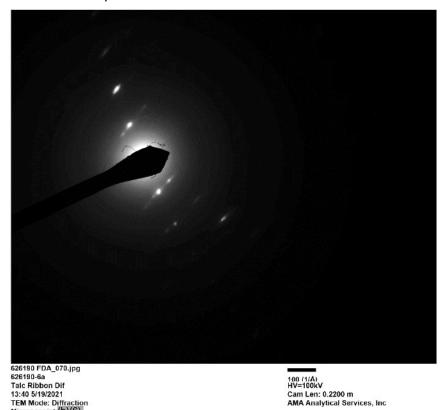
## Chemistry from the Talc Fiber pictured above



## 626190-6A, Talc Ribbon

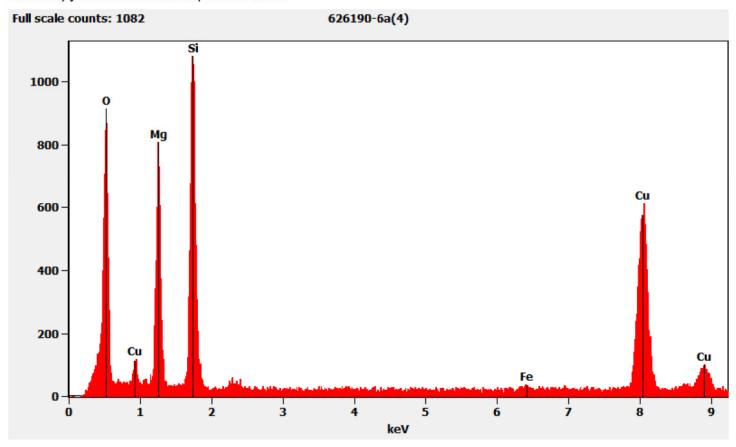


## Diffraction Pattern from the Talc Ribbon pictured above

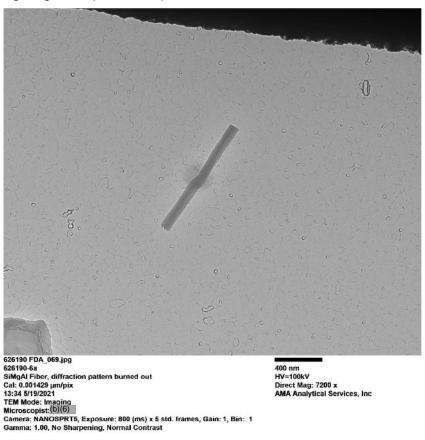


TEM Mode: Diffraction
Microscopist:[D](6)
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

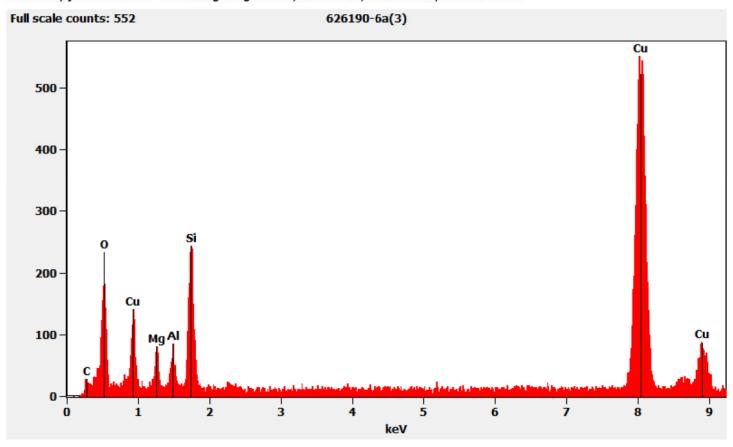
## Chemistry from the Talc Ribbon pictured above



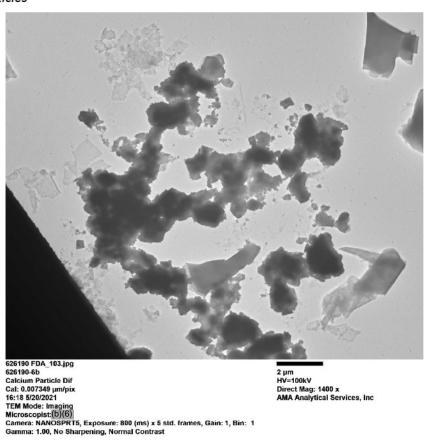
626190-6A, Fiber containing Magnesium, Aluminum, and Silicon



Chemistry from the Fiber containing Magnesium, Aluminum, and Silicon pictured above



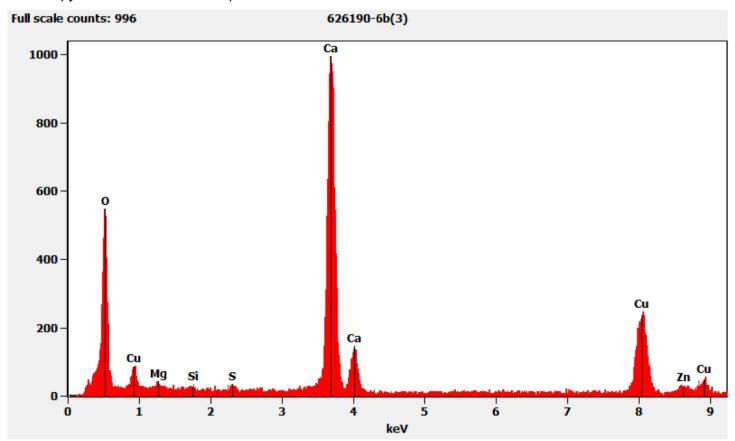
626190-6B, Calcium Particles



## Diffraction Pattern from the Calcium Particles pictured above



## Chemistry from the Calcium Particles pictured above



#### 626190-7A, 7B, 7C/Client Sample: 03242021-7

**PLM** 

All three aliquots of sample 03242021-7 were analyzed by (b)(6)on May 28, 2021. No asbestos or nonasbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

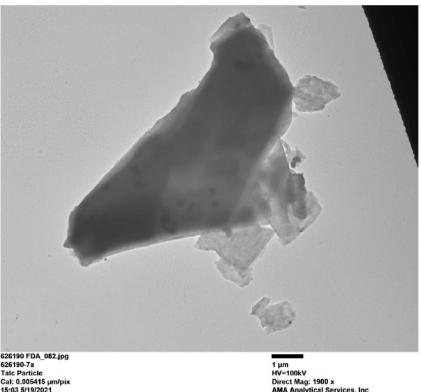
626190-7A	No Asbestos Detected
626190-7B	No Asbestos Detected
626190-7C	No Asbestos Detected

TEM (b)(6)analyzed aliquot 7A on May 19, 2021. Andreas Saldivar analyzed aliquots 7B and 7C on May 25, 2021. The primary particles observed were talc and mica; titanium and calcium particles were also observed along with a few talc fibers/ribbons and titanium fibers. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-7A	No Asbestos Detected
626190-7B	No Asbestos Detected
626190-7C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

#### 626190-7A, Talc Particle

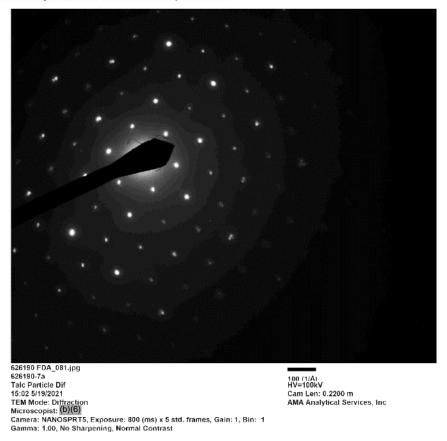


626190-7a Talc Particle Cal: 0.005415 µm/pix

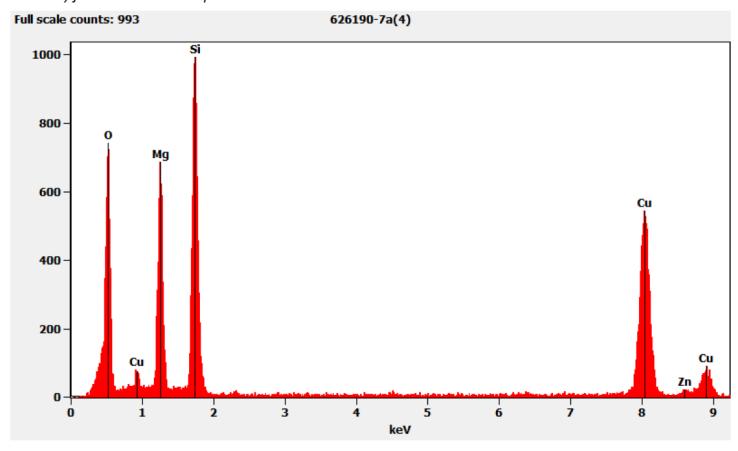
TEM Mode: Imagino Microscopist (b)(6) Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

Direct Mag: 1900 x AMA Analytical Services, Inc

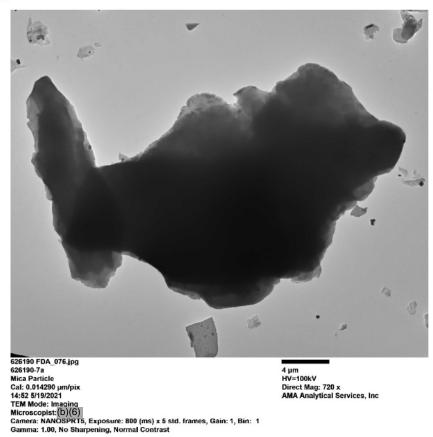
## Hexagonal Diffraction Pattern from the Talc Particle pictured above



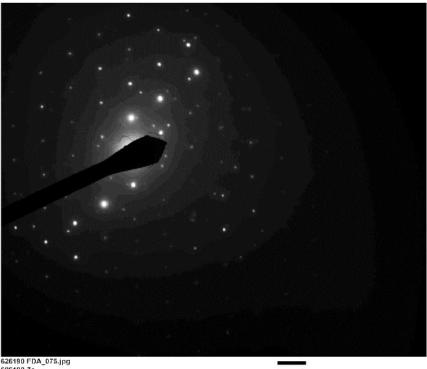
## Chemistry from the Talc Particle pictured above



## 626190-7A, Mica Particle



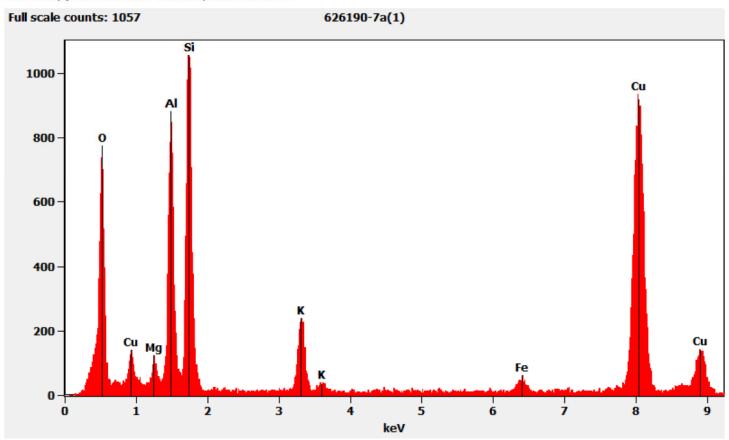
## Diffraction Pattern from the Mica Particle pictured above



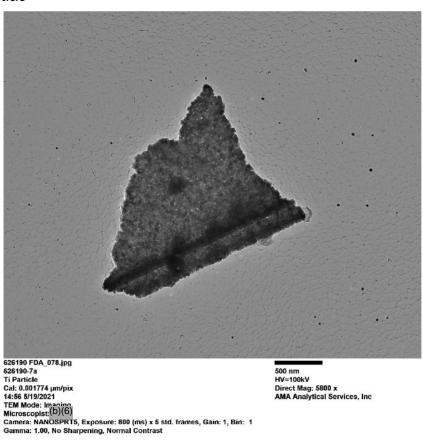
626190 FDA\_075.jpg
626190-7a
Mica Particle Dif
11:50 5119/2021
TEM Mode: Diffraction
Microscopist (b)(6)
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

100 (1/A) HV=100kV Cam Len: 0.2200 m AMA Analytical Services, Inc

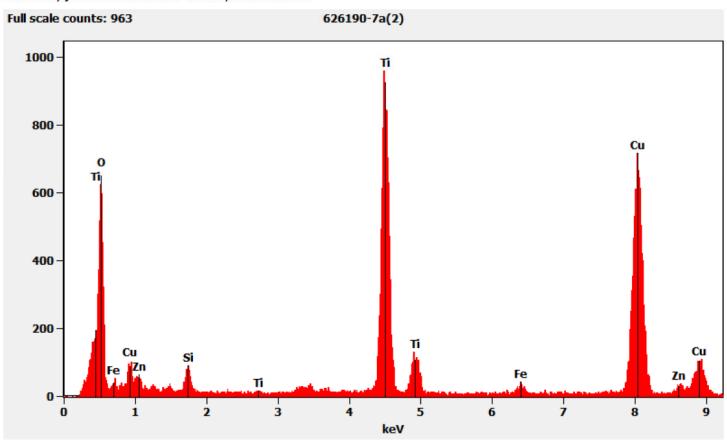
## Chemistry from the Mica Particle pictured above



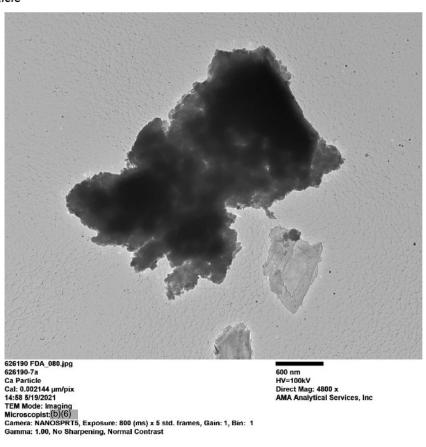
626190-7A, Titanium Particle



## Chemistry from the Titanium Particle pictured above



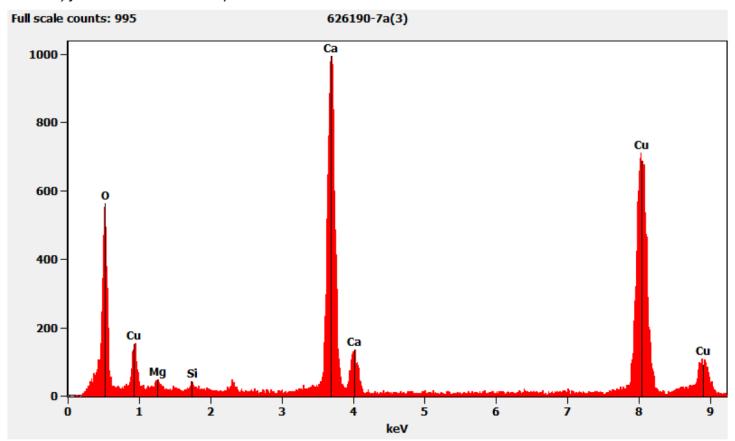
626190-7A, Calcium Particle



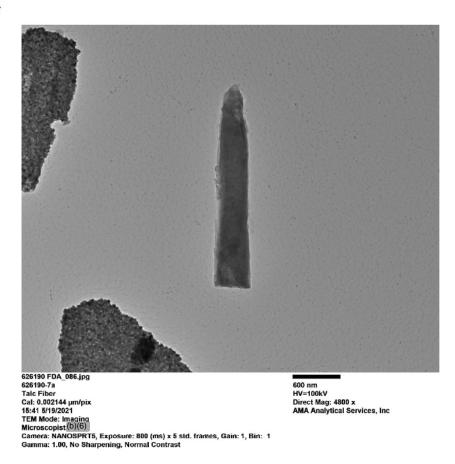
# Diffraction Pattern from the Calcium Particle pictured above



# Chemistry from the Calcium Particle pictured above



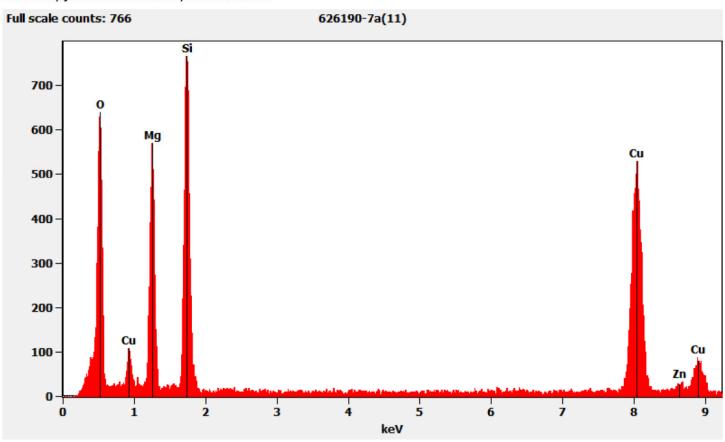
# 626190-7A, Talc Fiber



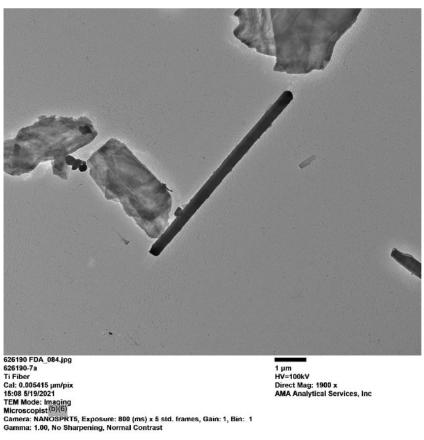
# Hexagonal Diffraction Pattern from the Talc Fiber pictured above



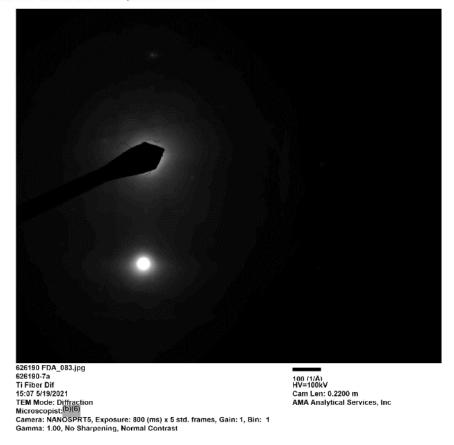
# Chemistry from the Talc Fiber pictured above



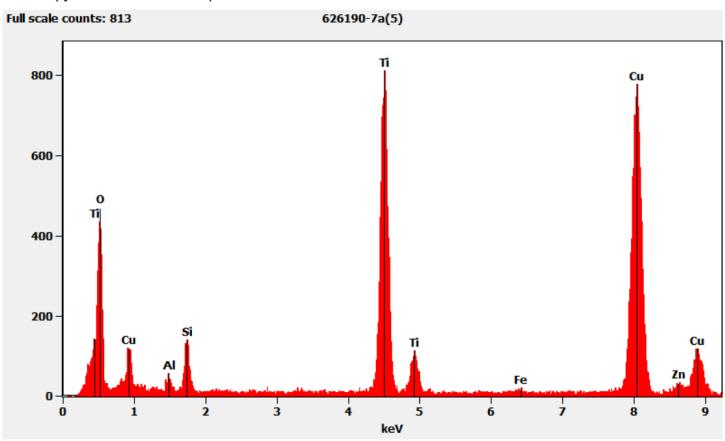
626190-7A, Titanium Fiber



# Diffraction Pattern from the Titanium Fiber pictured above



# Chemistry from the Titanium Fiber pictured above



### 626190-8A, 8B, 8C/Client Sample: 03242021-8

#### **PLM**

All three aliquots of sample 03242021-8 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-8A	No Asbestos Detected
626190-8B	No Asbestos Detected
626190-8C	No Asbestos Detected

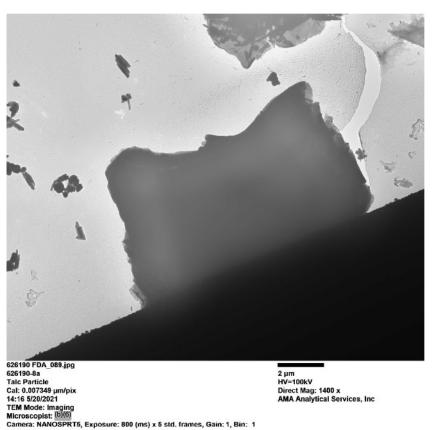
#### TEM

(b)(6) Inalyzed aliquot 8A on May 20, 2021. Andreas Saldivar analyzed aliquots 8B and 8C on May 26, 2021. The primary particles observed were talc and mica; titanium particles and iron particles/fibers were also observed along with a few silica spheres and barium sulfate particles. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-8A	No Asbestos Detected
626190-8B	No Asbestos Detected
626190-8C	No Asbestos Detected

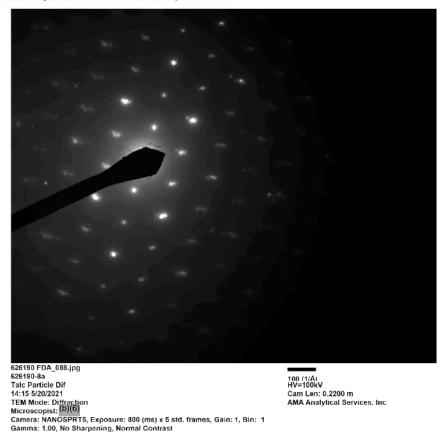
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in chemistry spectra are zinc and carbon from the TEM specimen holder.

#### 626190-8A, Talc Particle

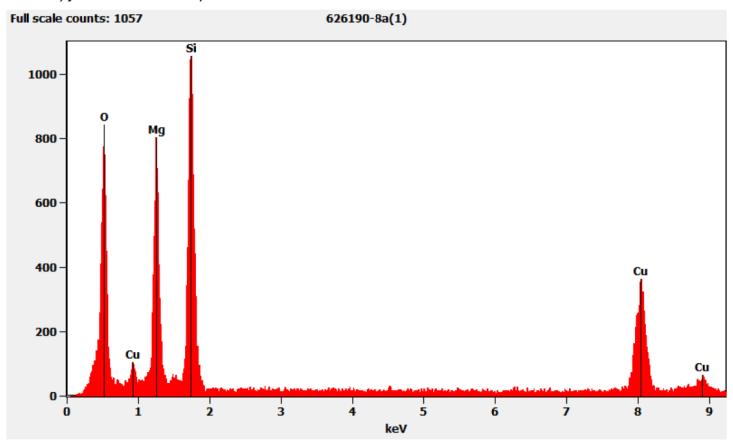


Gamma: 1.00, No Sharpening, Normal Contrast

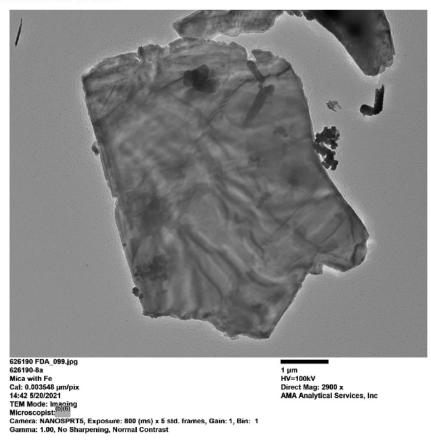
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



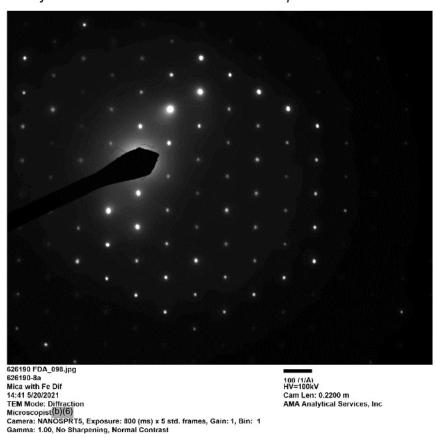
# Chemistry from the Talc Particle pictured above



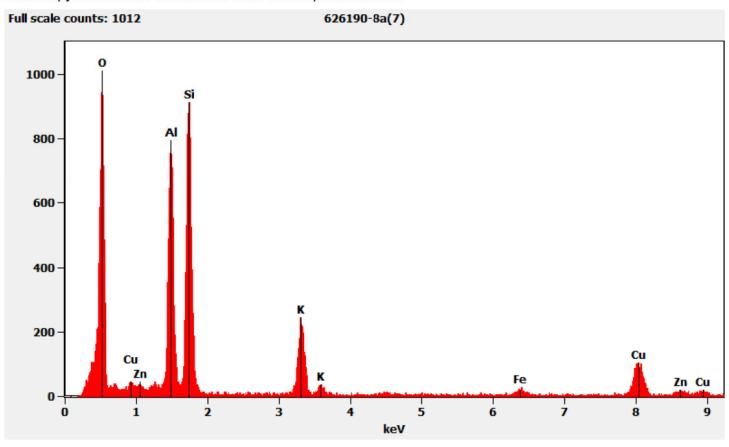
# 626190-8A, Mica Particle with Iron Particles



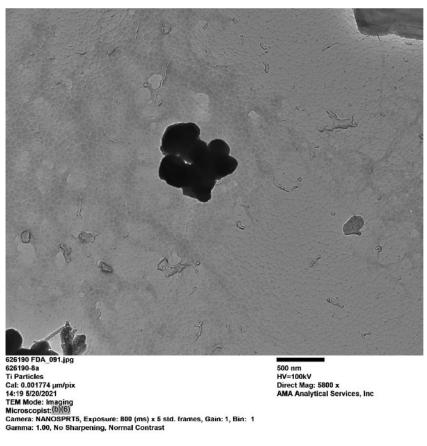
Hexagonal Diffraction Pattern from the Mica Particle with Iron Particles pictured above



Chemistry from the Mica Particle with Iron Particles pictured above



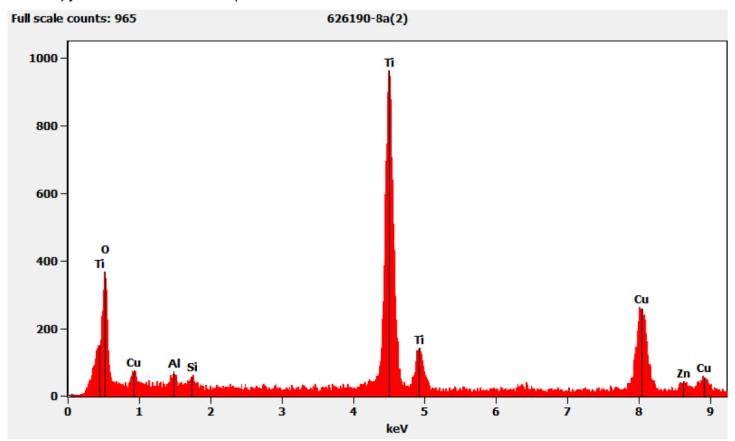
626190-8A, Titanium Particles



# Diffraction Pattern from Titanium Particles pictured above



# Chemistry from the Titanium Particles pictured above



# 626190-8A, Iron Particles/Fibers



626190 FDA 097.jpg 626190-8a Fe Particles/Fibers Cal: 0.001429 µm/pix 14:35 5/20/2021 TEM Mode: Imaging Microscopist: (b)(6)

14:39 97.01/2021
TEM Mode: Imaging
Microscopist: (0)(6)
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

400 nm HV=100kV Direct Mag: 7200 x AMA Analytical Services, Inc

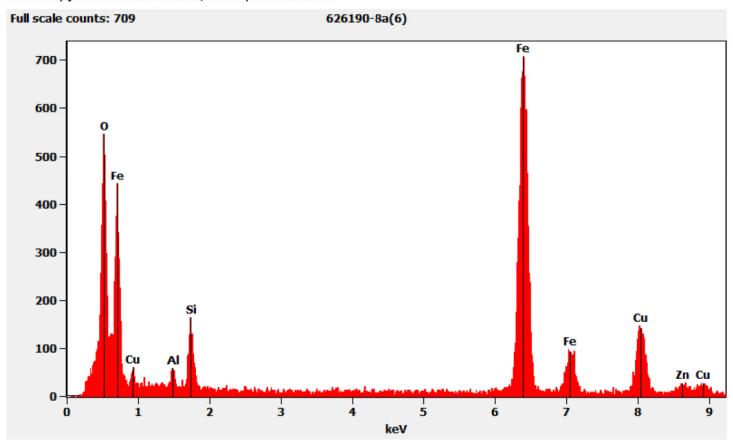
# Diffraction Pattern from the Iron Particles/Fibers pictured above



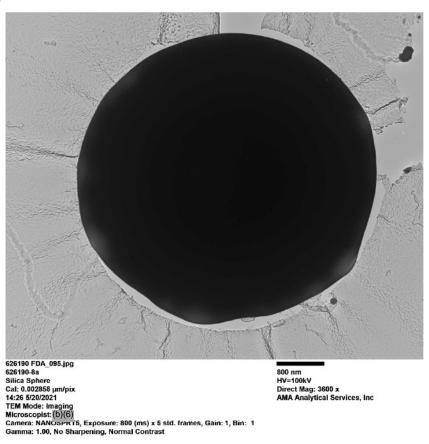
626190 FDA\_096.jpg 626190-8a Fe Particles/Fibers 14:34 5/20/2021 TEM Mode: Diffraction Microscopist; (b)(6)

TEM Mode: Diffraction Microscopist:[0](6) Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast 100 (1/A) HV=100kV Cam Len: 0.2200 m AMA Analytical Services, Inc

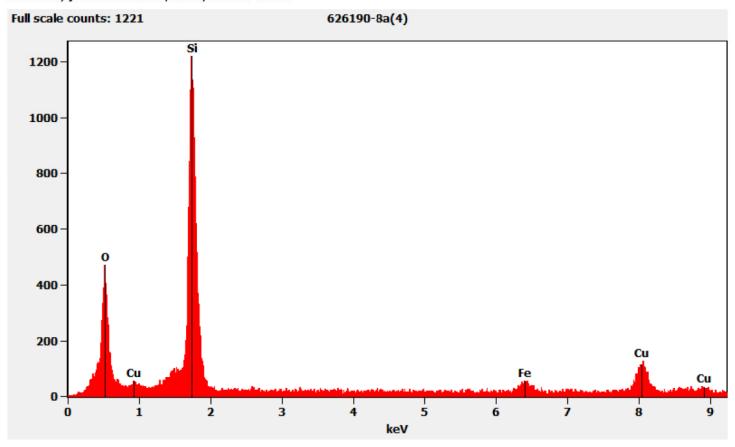
# Chemistry from the Iron Particles/Fibers pictured above



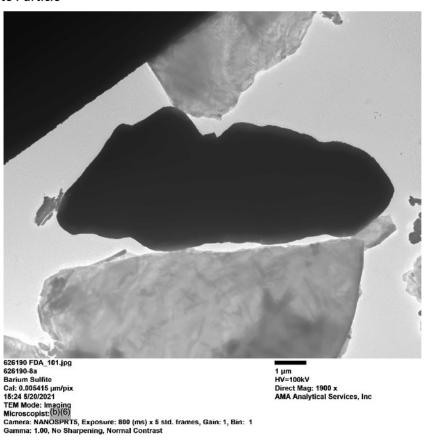
626190-8A, Silica Sphere



# Chemistry from the Silica Sphere pictured above



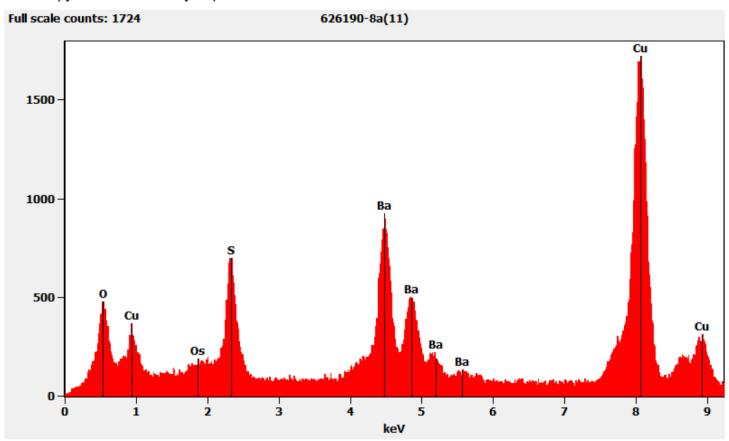
626190-8A, Barium Sulfate Particle



# Diffraction Pattern from the Barium Sulfate Particle pictured above



# Chemistry from the Barium Sulfate pictured above



### 626190-9A, 9B, 9C/Client Sample: 03242021-9

#### PLM

All three aliquots of sample 03242021-9 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-9A	No Asbestos Detected
626190-9B	No Asbestos Detected
626190-9C	No Asbestos Detected

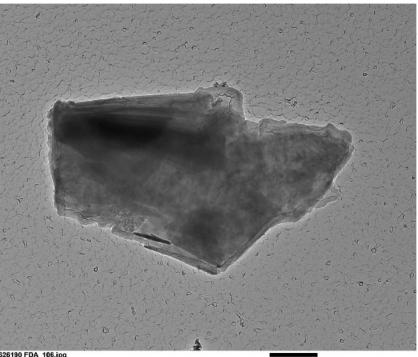
#### TEM

(b)(6) analyzed aliquot 9A on May 21, 2021. Andreas Saldivar analyzed aliquots 9B and 9C on May 26, 2021. The primary particle observed was talc; silica particles were also observed along with a few calcium particles, talc fibers/ribbons and particles containing magnesium, aluminum, and silicon. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-9A	No Asbestos Detected
626190-9B	No Asbestos Detected
626190-9C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in chemistry spectra are zinc and carbon from the TEM specimen holder.

### 626190-9A, Talc Particle



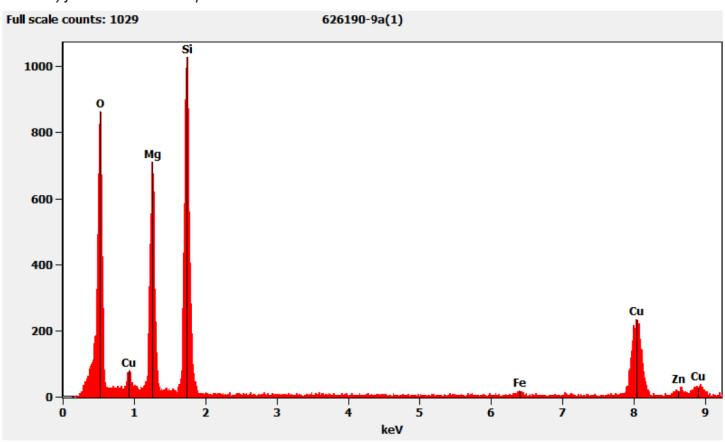
626190 FDA\_106.jpg 626190-9a Talc Particle Cal: 0.002144 µm/pix 13:12 5/21/2021 TEM Mode: Imaging Microscopist (b)(6)

Microscopisty্যতাত। Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00. No Sharoening. Normal Contrast 600 nm HV=100kV Direct Mag: 4800 x AMA Analytical Services, Inc

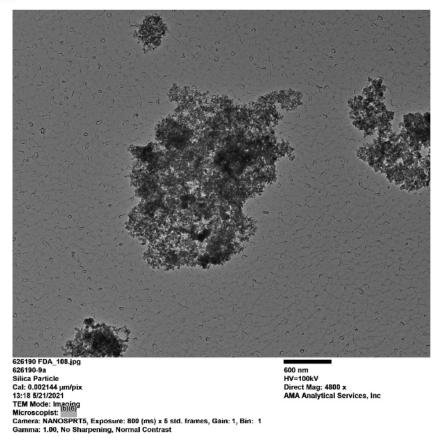
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



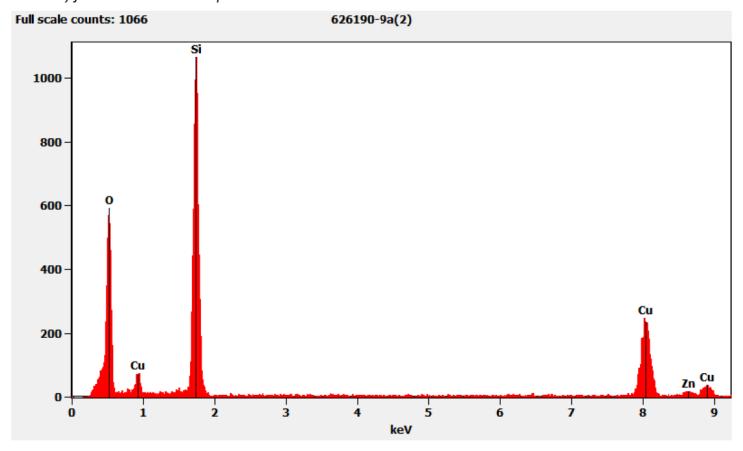
# Chemistry from the Talc Particle pictured above



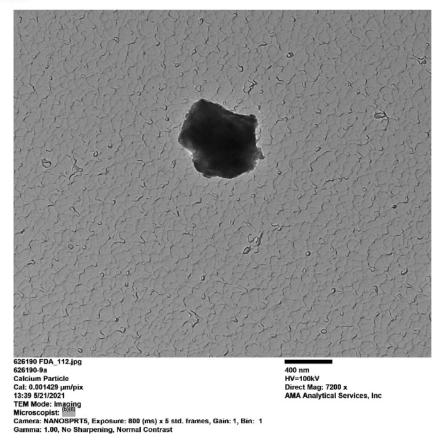
# 626190-9A, Silica Particles



# Chemistry from the Silica Particles pictured above



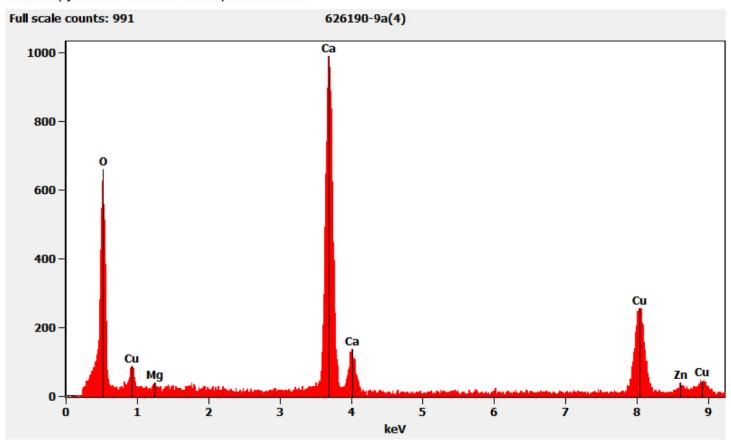
# 626190-9A, Calcium Particle



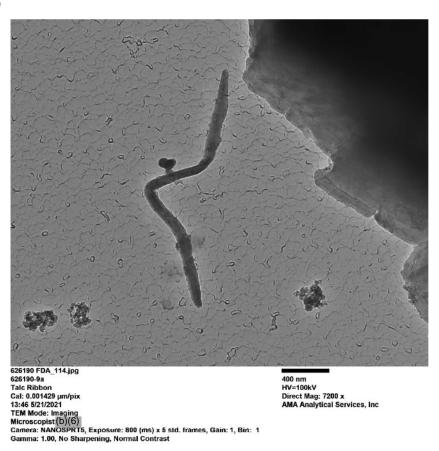
# Diffraction Pattern from Calcium Particle pictured above



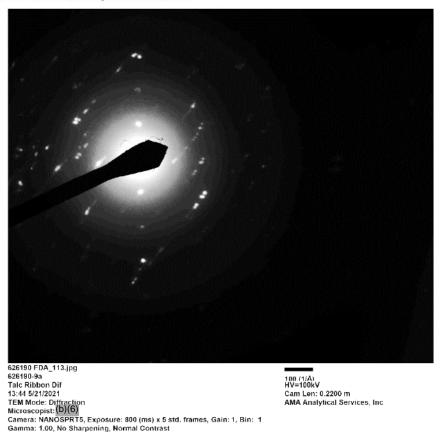
# Chemistry from the Calcium Particle pictured above



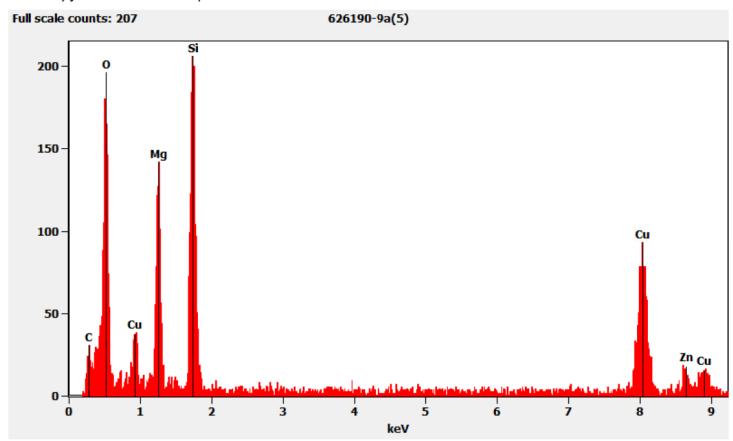
626190-9A, Talc Ribbon



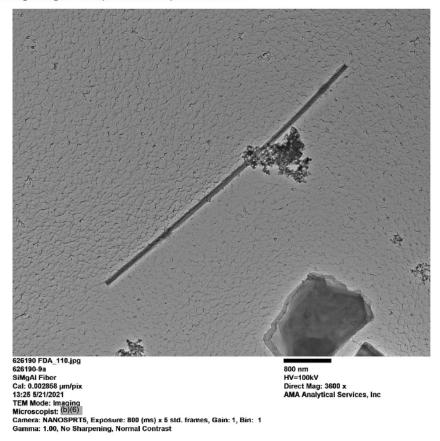
# Diffraction Pattern from the Talc Ribbon pictured above



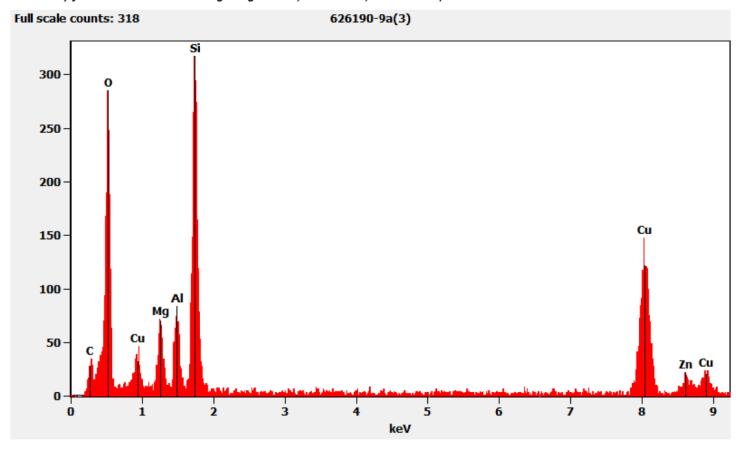
# Chemistry from the Talc Ribbon pictured above



626190-9A, Fiber containing Magnesium, Aluminum, and Silicon



Chemistry from the Fiber containing Magnesium, Aluminum, and Silicon pictured above



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### 626190-10A, 10B, 10C/Client Sample: 03242021-10

#### **PLM**

All three aliquots of sample 03242021-10 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-10A	No Asbestos Detected
626190-10B	No Asbestos Detected
626190-10C	No Asbestos Detected

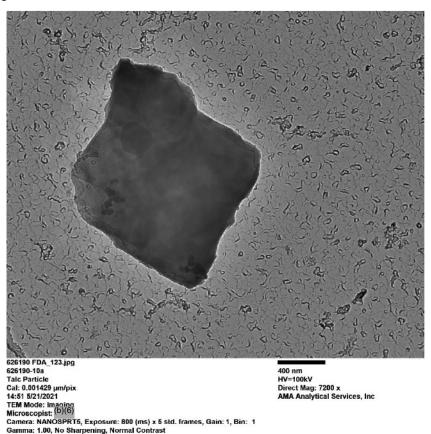
#### TEM

(b)(6) analyzed aliquot 10A on May 21, 2021. Andreas Saldivar analyzed aliquots 10B and 10c on May 27, 2021. The primary particles observed were talc and mica; iron and titanium particles were also observed along with some talc fibers/ribbons. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-10A	No Asbestos Detected
626190-10B	No Asbestos Detected
626190-10C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in chemistry spectra are zinc and carbon, which are from the TEM specimen holder.

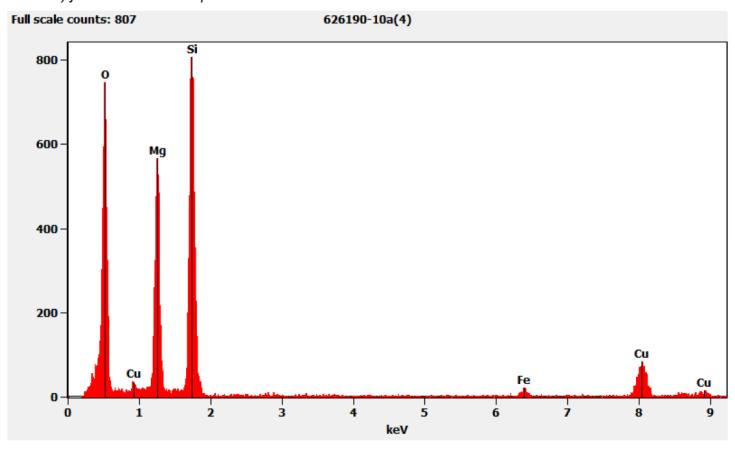
#### 626190-10A, Talc Particle



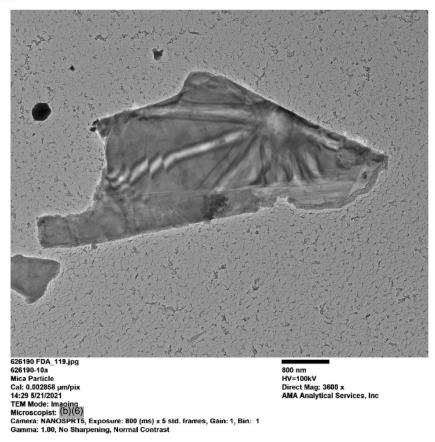
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



# Chemistry from the Talc Particle pictured above



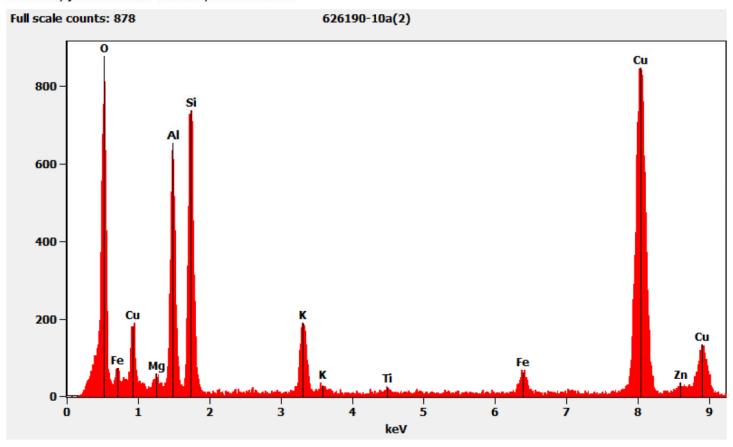
# 626190-10A, Mica Particle



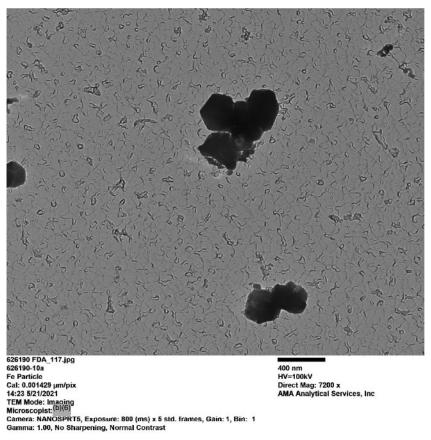
# Hexagonal Diffraction Pattern from the Mica Particle pictured above



# Chemistry from the Mica Particle pictured above



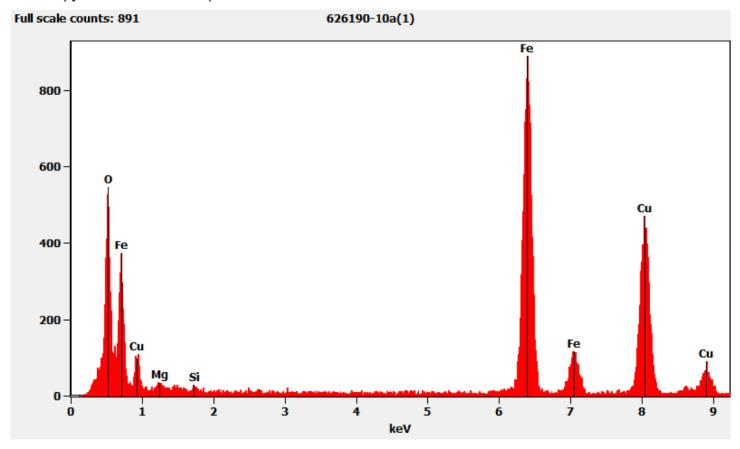
626190-10A, Iron Particles



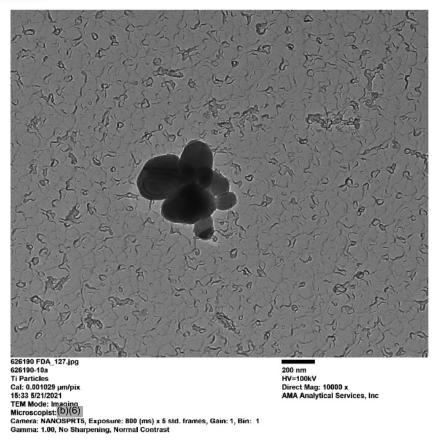
# Diffraction Pattern from Iron Particles pictured above



# Chemistry from the Iron Particles pictured above



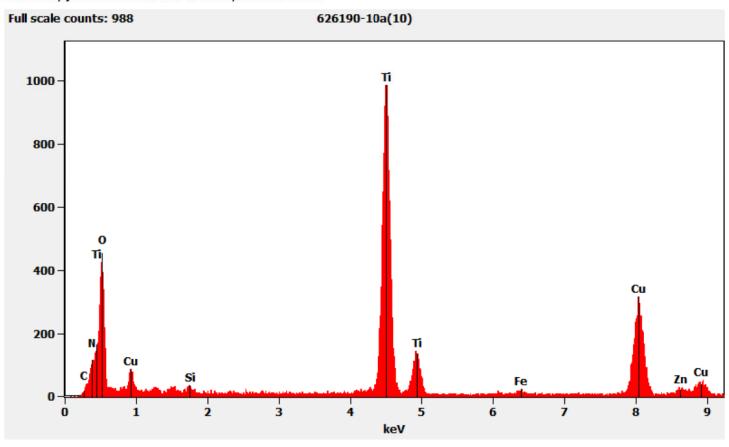
# 626190-10A, Titanium Particles



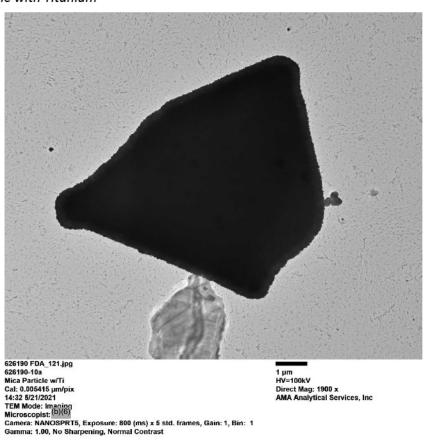
# Diffraction Pattern from the Titanium Particles pictured above



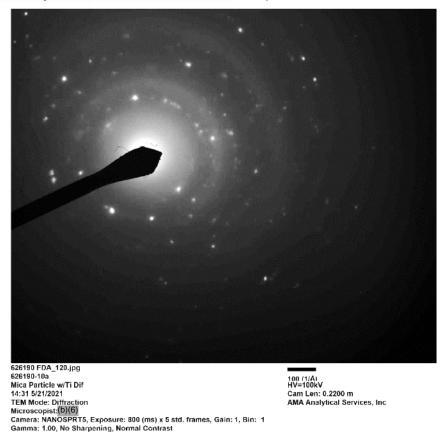
# Chemistry from the Titanium Particles pictured above



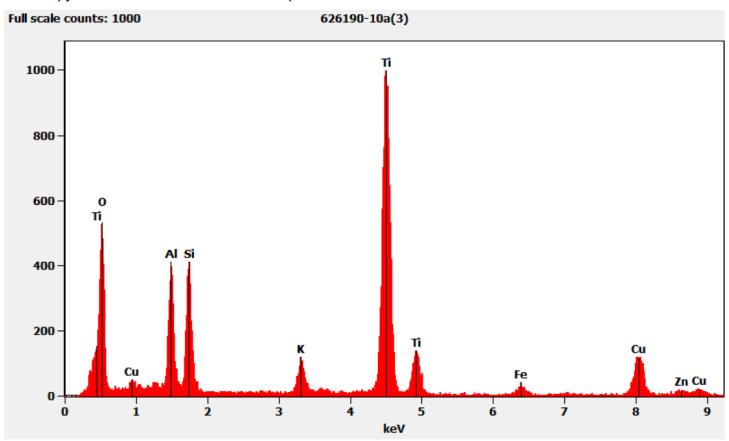
626190-10A, Mica Particle with Titanium



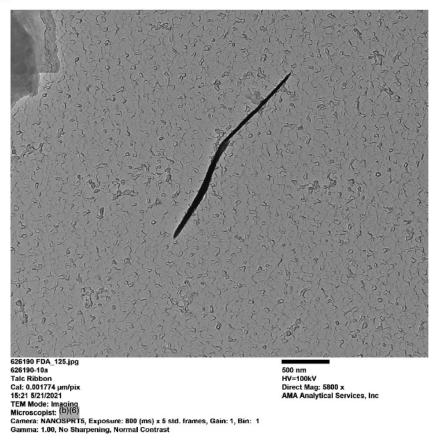
# Hexagonal Diffraction Pattern from the Mica Particle with Titanium pictured above



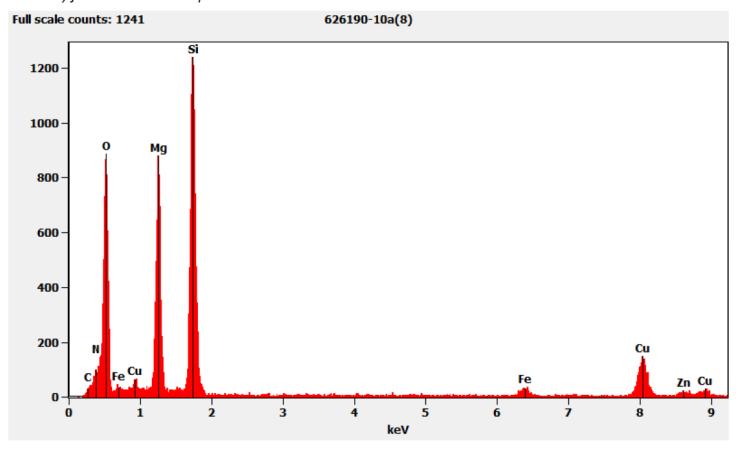
# Chemistry from the Mica Particle with Titanium pictured above



# 626190-10A, Talc Ribbon



# Chemistry from the Talc Ribbon pictured above



### 626190-11A, 11B, 11C/Client Sample: 03242021-11

#### PLM

All three aliquots of sample 03242021-11 were analyzed by (b)(6) on May 28, 2021. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

626190-11A	No Asbestos Detected
626190-11B	No Asbestos Detected
626190-11C	No Asbestos Detected

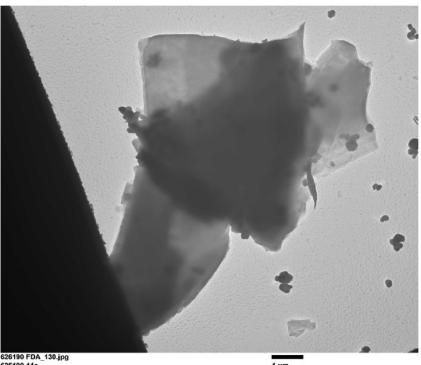
TEM

(b)(6) analyzed aliquot 11A on May 21, 2021. Andreas Saldivar analyzed aliquots 11B and 11C on May 27, 2021. The primary particle observed was talc; titanium particles were also observed along with a few talc fibers/ribbons. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

626190-11A	No Asbestos Detected
626190-11B	No Asbestos Detected
626190-11C	No Asbestos Detected

Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in chemistry spectra are zinc and carbon, which are from the TEM specimen holder.

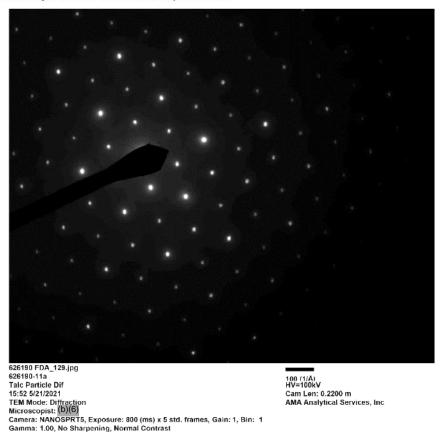
#### 626190-11A, Talc Particle



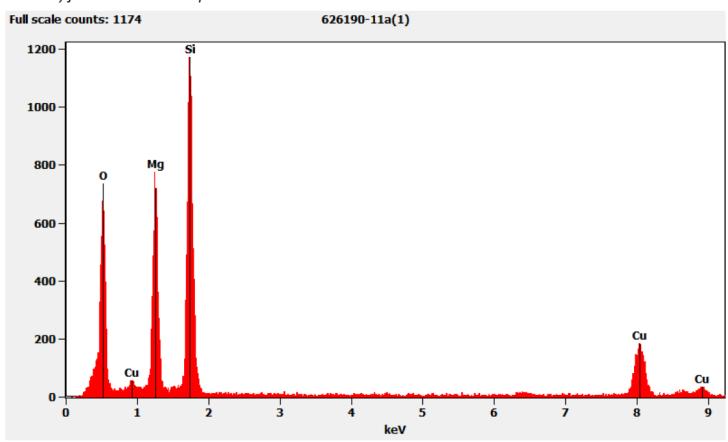
626190 FDA\_130.jpg 626190-11a Talc Particle Cal: 0.005415 µm/pix 15:53 5/21/2021 TEM Mode: Imaging Microscopist: (b)(6)

Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast 1 µm HV=100kV Direct Mag: 1900 x AMA Analytical Services, Inc.

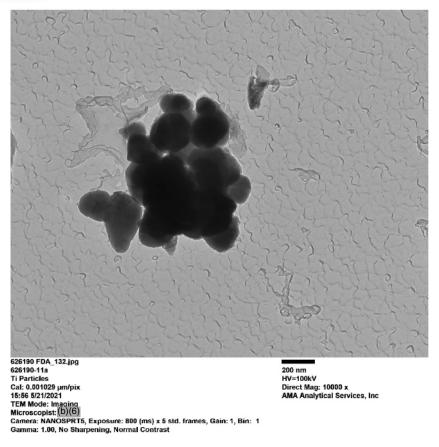
# Hexagonal Diffraction Pattern from the Talc Particle pictured above



# Chemistry from the Talc Particle pictured above



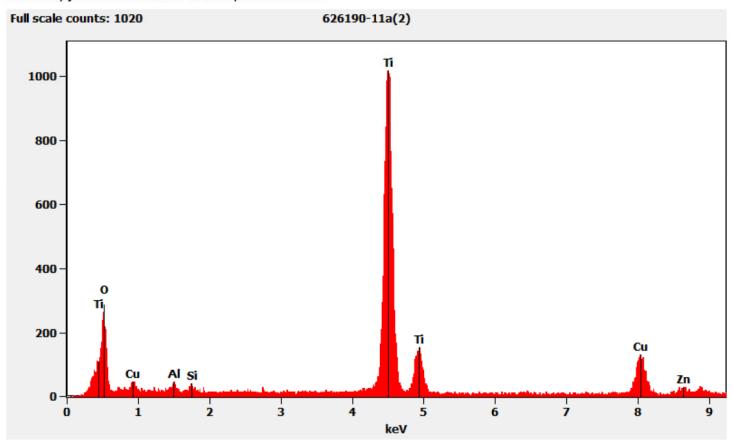
# 626190-11A, Titanium Particles



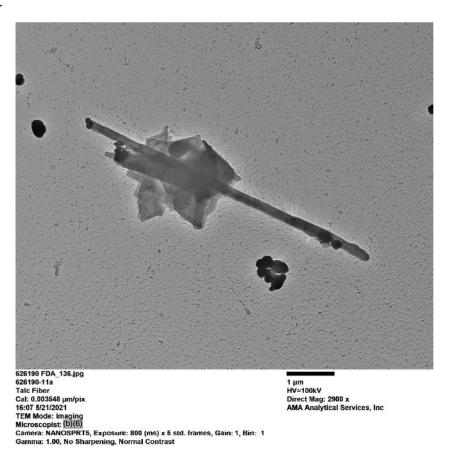
# Diffraction Pattern from the Titanium Particles pictured above



# Chemistry from the Titanium Particles pictured above



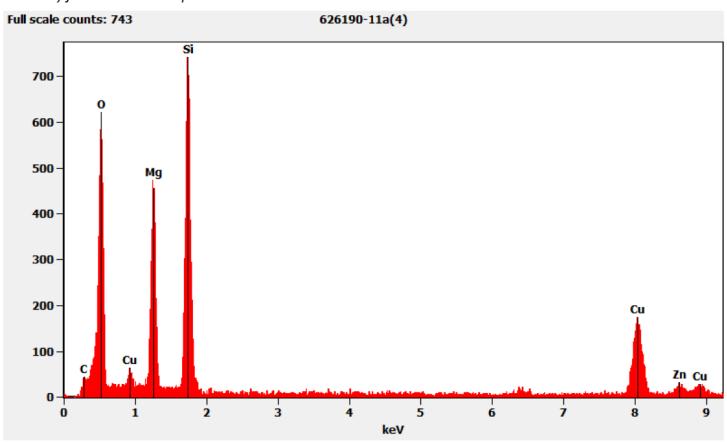
626190-11A, Talc Fiber



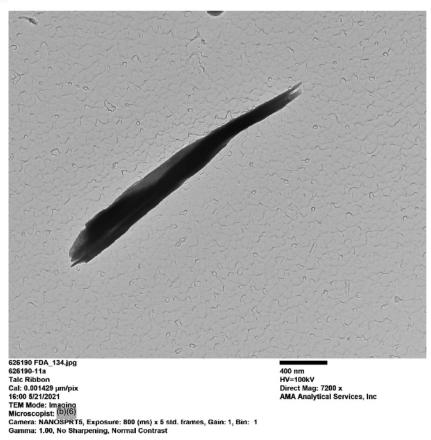
# Hexagonal Diffraction Pattern from Talc Fiber pictured above



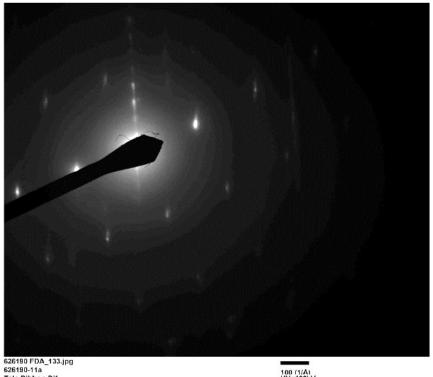
# Chemistry from the Talc Fiber pictured above



# 626190-11A, Talc Ribbon

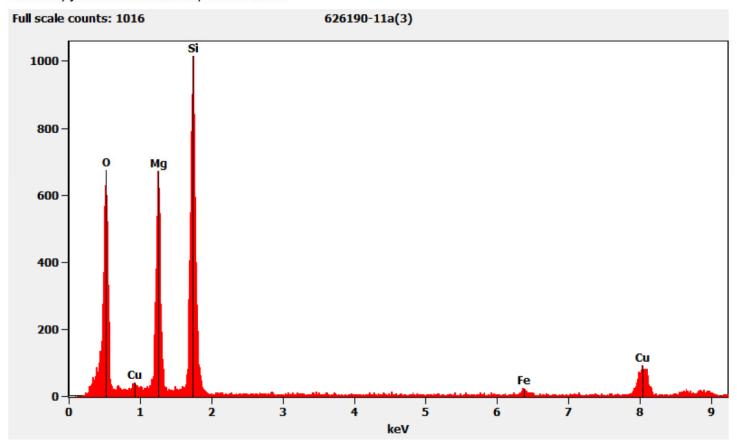


# Diffraction Pattern from Talc Ribbon pictured above



626190 FDA\_133.jpg
626190-11a
Talc Ribbon Dif
15:59 5/21/2021
TEM Mode: Diffraction
Microscopist(b)(6)
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

100 (1/A) HV=100kV Cam Len: 0.2200 m AMA Analytical Services, Inc Chemistry from the Talc Ribbon pictured above



#### QC Discussion:

Microscope alignment and calibration for both the PLM and TEM scopes, and EDXA unit calibration were performed on each day of analysis as specified by method requirements and standard laboratory operating procedures. The analytical balance used for gravimetric reduction is verified weekly at three (3) tare levels using three NIST-traceable weights – 10.0-g, 0.1-g, 0.5-g – and on each day of operation using the 0.1-g and 0.5-g weights tared with an 8-mL glass vial. The muffle furnace is verified monthly at a temperature of 480°C. All equipment was functioning within normal operating parameters

Matrix blank samples were prepared at rate of 10% or greater alongside the client samples with each series of samples that were put into the muffle furnace together. The matrix blank samples were prepared using Sigma-Aldrich Talc Powder 18654 (Cas No. 14807-96-6; EC No. 238-877-9, Lot 82330). Analysis of the matrix blank samples was only required if asbestos, or the non-asbestos versions of the regulated minerals, was found on the associated client samples unless otherwise noted. Matrix blank sample numbers NB21-312/313, NB21-324/325 and NB21-329/330 were not analyzed since no asbestos was observed on the associated client samples.

A talc reference control sample was randomly selected from our library of TEM grid preparations made from Sigma-Aldrich Talc Powder, <10 micron (Product No. 643604-500G; Batch No. 10830AJ) spiked with various levels of Chrysotile ranging from 0.4%-10%. One (1) reference control sample, sample number 626190-RB1, was analyzed with this set. It was analyzed by (b)(6)

Filtration blank samples were prepared alongside the client samples with each use of the filtration apparatus. Analysis of these samples was only required on those blanks associated with a client sample on which asbestos, or the non-asbestos versions of the regulated minerals, was found unless otherwise noted. Filtration blank sample numbers DI-Blank-01 through DI-Blank-11 were not analyzed since no asbestos was observed on the associated client samples.

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TEM grid preparation (EB) blank samples were prepared with each batch of carbon coated filters. AMA policy is to analyze these blank samples whenever asbestos, or the non-asbestos versions of the regulated minerals, is detected on an associated client sample or when the laboratory blank identification number ends in a "0" or "5." Since no asbestos was observed on any of the client samples, only EB Blank IDs 56710, 56730 and 56740 were analyzed. (b)(6) analyzed these samples on July 21, 2021. No asbestos was detected on the TEM grid preparation blank samples.

Our laboratory information management system (LIMS) randomly selected sample 626190-6A/03242021-6 for additional duplicate QC analysis. Independent preparations were made for the PLM and TEM portions of analysis. The duplicate QC analysis was performed by (b)(6) on May 28, 2021 for PLM and by (b)(6) on June 2, 2021 for TEM. The QC results were consistent with the original findings.

Our laboratory information management system (LIMS) randomly selected sample 626190-7A/03242021-7 for additional replicate QC analysis. Independent preparations were made for the PLM and TEM portions of analysis. The replicate QC analysis was performed by (b)(6) on May 28, 2021 for PLM and by Andreas Saldivar on June 2, 2021 for TEM. The QC results were consistent with the original findings.

#### Attachments:

The following items are attached to this case narrative for your reference:

- 1) Sample Log-In Sheet
- 2) Analytical Balance Verification Log
- 3) Daily PLM Scope Verification Log
- 4) Refractive Index Oil Verification Log
- 5) Daily TEM Scope Verification Log(s)
- 6) QC Results Summary for 626190
- 7) NB (Matrix) Blank Preparation Log
- 8) RB (Reference) Sample Bench Sheet(s)
- 9) EB (TEM Grid) Blank Preparation Log
- 10) EB (TEM Grid) Blank Bench Sheet(s)
- 11) Duplicate & Replicate QC Charts for (b)(6) for samples analyzed between 1/1/2021 & 5/28/2021
- 12) Duplicate & Replicate QC Charts for (b)(6) for samples analyzed between 1/1/2021 & 5/28/2021
- 13) Duplicate & Replicate QC Charts for (b)(6) for samples analyzed between 1/1/2021 & 5/28/2021
- 14) Duplicate & Replicate QC Charts for Andreas Saldivar for samples analyzed between 1/1/2019 & 5/28/2021
- 15) Raw Data Sheets
  - a. PLM Gravimetric Reduction Bench Sheet
  - b. TEM Gravimetric/Filtration Bench Sheet
  - c. PLM Analysis
  - d. TEM Analysis
  - e. Duplicate QC Analysis
  - f. Replicate QC Analysis

I certify that all information contained in this report pertaining to laboratory events, procedures, and protocols is true to the best of my knowledge and accurately describes the handling of this project by AMA Analytical Services, Inc., and its personnel.

Andreas Saldivar

Date

7/23/2021

President