









Analytical Report for:

Testing of Official Samples of Talc Containing Cosmetics for Asbestiform Fibers

Contract Number: 75F40119P10689

Assignment DFPG# 22-08, Batch No. 01212022 (Batch #1) AMA COC No. 633185

US FDA
Office of Cosmetics & Colors
4300 River Road
College Park, MD 20740

Chain of Custody: 633185

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

College Park, MD 20740

Attention: John Gasper

Job Name: Assignment DFPG #22-08 Job Location: Batch 1 (No. 01212022)

Job Number: CLIN 1001 PO Number: 75F40119P10689 Date Submitted: 2/22/2022 Date Analyzed: 3/7/2022-3/31/2022 Report Date: 6/9/2022

Date Sampled: Not Provided Person Submitting: Martha Schwartz Revised: 6/30/2022 (Revision #1)

SUMMARY OF ANALYSIS

					AIL OF AIRES	7.000					
		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 Mass Calculation	Asbestos by PLM	Organics	Soluable	Other	Comments				
							400-400-42		100000000000000000000000000000000000000	200.000	
633185-1A	01212022-1	0.00000363%	0.00001450%	ND	ND	< 0.00001%	ND	3.43%	5.89%	90.68%	
633185-1B	01212022-1	0.00000305%	0.00001222%	ND	ND	< 0.00001%	ND	3.44%	7.26%	89.30%	
633185-1C	01212022-1	0.00000349%	0.00001396%	ND	ND	< 0.00001%	ND	3.44%	6.66%	89.90%	
633185-2A	01212022-2	0.00000270%	0.00001080%	ND	ND	< 0.00001%	ND	17.36%	15.86%	66.78%	
633185-2B	01212022-2	0.00000346%	0.00001384%	ND	ND	< 0.00001%	ND	17.36%	14.56%	68.08%	
633185-2C	01212022-2	0.00000315%	0.00001261%	ND	ND	< 0.00001%	ND	17.31%	15.07%	67.62%	
633185-3A	01212022-3	0.00000275%	0.00001100%	ND	ND	< 0.00001%	ND	8.80%	8.98%	82.22%	
633185-3B	01212022-3	0.00000253%	0.00001012%	ND	ND	< 0.00001%	ND	8.81%	9.92%	81.27%	
633185-3C	01212022-3	0.00000256%	0.00001025%	ND	ND	< 0.00001%	ND	8.83%	10.94%	80.23%	
633185-4A	01212022-4	0.00000270%	0.00001078%	ND	ND	< 0.00001%	ND	11.73%	12.76%	75.51%	
633185-4B	01212022-4	0.00000288%	0.00001153%	ND	ND	< 0.00001%	ND	11.76%	13.53%	74.70%	
633185-4C	01212022-4	0.00000265%	0.00001061%	ND	ND	< 0.00001%	ND	11.75%	12.71%	75.54%	
633185-5A	01212022-5	0.00000329%	0.00001314%	ND	ND	< 0.00001%	ND	19.50%	7.27%	73.23%	
633185-5B	01212022-5	0.00000347%	0.00001386%	ND	ND	< 0.00001%	ND	19.45%	8.18%	72.36%	
633185-5C	01212022-5	0.00000262%	0.00001050%	ND	ND	< 0.00001%	ND	19.43%	6.40%	74.17%	
633185-6A	01212022-6	0.00000260%	0.00001039%	ND	ND	< 0.00001%	ND	11.63%	7.38%	80.99%	
633185-6B	01212022-6	0.00000272%	0.00001086%	ND	ND	< 0.00001%	ND	11.72%	8.15%	80.13%	
633185-6C	01212022-6	0.00000272%	0.00001026%	ND	ND	< 0.00001%	ND	11.70%	7.50%	80.79%	
633185-7A	01212022-7	0.00000258%	0.00001020%	ND ND	ND	< 0.00001%	ND	29.04%	6.20%	64.76%	
633185-7A	01212022-7	0.00000238%	0.00001072%	ND	ND	< 0.00001%	ND	28.92%	7.29%	63.79%	
633185-7C	01212022-7	0.00000330%	0.00001318%	ND	ND	< 0.00001%	ND	29.01%	7.23%	63.78%	
633185-8A	01212022-7	0.00000302%		ND ND	ND	< 0.00001%		15.87%	7.02%	77.11%	
			0.00001006%			100-100-00-00-00-00-00-00-00-00-00-00-00	ND	- construint or an annual construint			
633185-8B	01212022-8	0.00000242%	0.00000969%	ND	ND	< 0.00001%	ND	15.90%	7.44%	76.67%	
633185-8C	01212022-8	0.00000269%	0.00001078%	ND	ND	< 0.00001%	ND	15.85%	5.92%	78.23%	
633185-9A	01212022-9	0.00000238%	0.00000951%	ND	ND	< 0.00001%	ND	5.80%	7.31%	86.90%	
633185-9B	01212022-9	0.00000271%	0.00001085%	ND	ND	< 0.00001%	ND	5.78%	7.68%	86.54%	
633185-9C	01212022-9	0.00000292%	0.00001166%	ND	ND	< 0.00001%	ND	5.79%	8.98%	85.23%	
633185-10A	01212022-10	0.00000244%	0.00000976%	ND	ND	< 0.00001%	ND	0.21%	7.50%	92.29%	
633185-10B	01212022-10	0.00000337%	0.00001349%	ND	ND	< 0.00001%	ND	0.29%	9.99%	89.72%	
633185-10C	01212022-10	0.00000275%	0.00001099%	ND	ND	< 0.00001%	ND	0.32%	7.65%	92.03%	
633185-11A	01212022-11	0.00000256%	0.00001025%	ND	ND	< 0.00001%	ND	1.90%	11.83%	86.27%	
633185-11B	01212022-11	0.00000239%	0.00000955%	ND	ND	< 0.00001%	ND	1.86%	10.82%	87.32%	
633185-11C	01212022-11	0.00000440%	0.00001759%	ND	ND	< 0.00002%	ND	1.83%	11.04%	87.13%	
633185-12A	01212022-12	0.00000325%	0.00001301%	ND	ND	< 0.00001%	ND	18.98%	5.27%	75.75%	
633185-12B	01212022-12	0.00000282%	0.00001129%	ND	ND	< 0.00001%	ND	18.87%	6.23%	74.90%	
633185-12C	01212022-12	0.00000308%	0.00001232%	ND	ND	< 0.00001%	ND	18.94%	6.98%	74.08%	
633185-13A	01212022-13	0.00000312%	0.00001250%	ND	ND	< 0.00001%	ND	21.36%	5.68%	72.96%	
633185-13B	01212022-13	0.00000378%	0.00001512%	ND	ND	< 0.00002%	ND	21.34%	5.06%	73.61%	
633185-13C	01212022-13	0.00000280%	0.00001118%	ND	ND	< 0.00001%	ND	21.38%	4.70%	73.93%	
633185-14A	01212022-14	0.00000411%	0.00001642%	ND	ND	< 0.00002%	ND	16.49%	6.63%	76.87%	
633185-14B	01212022-14	0.00000111%	0.00001094%	ND	ND	< 0.00001%	ND	16.57%	6.20%	77.23%	

Chain of Custody: 633185

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

College Park, MD 20740

Attention: John Gasper

Job Name: Assignment DFPG #22-08 Job Location: Batch 1 (No. 01212022)

Job Number: CLIN 1001 PO Number: 75F40119P10689 Date Submitted: 2/22/2022

Date Analyzed: 3/7/2022-3/31/2022 Report Date: 6/9/2022

Date Sampled: Not Provided Person Submitting: Martha Schwartz

Revised: 6/30/2022 (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 Sam	Client Sample ID	Using ASTM D5756 Mass Calculation	M D5756 Asbestos by PLM Organics Soluable Other	Other	Comments						
633185-14C	01212022-14	0.00000286%	0.00001146%	ND	ND	< 0.00001%	ND	16.66%	6.42%	76.91%	

LOD = Limit of Detection LOQ = Limit of Quantificatio 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

Analyst(s):

PLM TEM

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

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FDA Office of Cosmetics & Colors

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Record Changes Report

Date	Description
6/30/2022	1) p. 148, added measurement scale units "nm" to Elongated Mica Particle picture for sample 13A
	2) p. 178, added QC Summary
	3) p. 183, removed section for RB Analytical Bench Sheet(s)

Chain of Custody

AHHA-LAP (#100470) NVLAP (#101143-0) NYL 4475 Forbes Blvd. • Lanharm, MD 20706 (301) 459-2640 • (800) 346-0961 • Fax (301) 459 www.amalab.com Mailing/Billing Information: Client Name: US Food & Drug / Address: Office of Cosmetics 4300 River Road Address: College Park, MD 20 Phone #:	Administ and Colo	ration Job N DTS Job L Job # Point	Cosmetics ittal Information: ame: Assignment Assignment Batch CLIN 1001 of Contact: John	ent DFPG #22-0 1 (No. 01212022 	75F401 Cell #:_ Cell #:_ S & email/fax	
		N AROUND TIME (TAT):				RT TO:
After Hours (must be pre-schedu After Hours Service is not provi Asbestos in Tale/Cosmetics Ar	ded for	Normal Business Hours	/2022 thru 5/2022	Email CC 1: steve □ Email CC 2: □ Verbals	jasper@ n.wolfga	fda.hhs.gov ng.fda.hhs.gov
Data Package Level [Select One]:		FDA Modified Procedures for PLM-ELAP 198.6 ificate of Analysis & Signed COC)Level I (Standard + Q.e.) to complete bottom section	A/QC Summary)	Level II (I+ Bench Sheets		III (II + Case Narrative)
Sample Number	No. of Aliquots to Prepare & Analyze	Sample Description (ie, color, c		al being submitted for analysis]		Comments/Instructions
Items #s 1 thru 14	3	14 '1-oz glass jars submitted in pink	vacuum seal	ed bags with		
		custody seals intact (sealed by M. Se	chwartz 1/24	/2022-2/14/2022		
		See Attached FDA COC for additiona	al details.			
	Print Name	Sign Name	Date	Time		
Retinquised by:	(6		2/22/2022	10:00	UPS = FedEx = USPS	Shipping Information □ In-Person □ Drop Box □ Courier 0.58 A 0.305125000



1DFC 6th Ave & Kipling St Bldg 20, Door W-10 P.O. Box 25087 Denver, CO 80225-0087

February 16, 2022

AMA Analytical Services, Inc.

Attn: (b) (6) 4475 Forbes Blvd. Lanham, MD 20706 Phone: 301-459-2640

Re: Samples for Asbestos Analysis, Batch #01212022

Dear(b) (6)

Enclosed in box are eleven (14) approx. 5-g samples of commercial talc-containing cosmetic products being submitted for analysis for asbestiform fibers by transmission electron microscope (TEM) per FDA Assignment DFPG #2-08, Contract No. #75F40119P10689. Also included in box is one chain of custody form to be completed by recipient for tracking of sample batch at AMA. Please analyze samples as agreed.

The fourteen (14) samples in this shipment constitute Batch 1 (No. 01212022) of the 50 samples that will be submitted to AMA for analysis in 2022.

If there are any questions, please contact: John Gasper: 240-402-1133 john.gasper@fda.hhs.gov

Best regards,

Martha H. Schwartz
Chemist

Chemistry Branch Denver Laboratory Office of Regulatory Affairs U.S. Food and Drug Administration T: 303-236-9653

martha.schwartz@fda.hhs.gov

Enclosure: Chain of custody

OFFICE	and Drug Administration of Regulatory Affairs of Regulatory Science	Document Number: FORM-000796	Revision #: 00 Revised: 02/21/2020
Title:	smetic Talc Sample Chain-of-C	ustody Form	Page 1 of 3

Batch No:01212022	
Submitter:Martha H. Schwartz	
Assignment No./ Contract No.:DFPG #22-08 / #_75F40 tt9P 0689	_
AMA COC No.:	
Date Sealed:2/15/22 Sample Type:Official Samples	

	Description of Evidence							
Item #	Quantity	Description of Item (Lab#, Lot #, Condition)						
		Approx 5g of prepared tak-confining cosmetic sample						
1		↓						

Adapted from: Technical Working Group on Biological Evidence Preservation. *The Biological Evidence Preservation Handbook: Best Practices for Evidence Handlers*. U.S. Department of Commerce, National Institute of Standards and Technology. 2013.

For the most current and official copy, check QMiS

FOOD AND DRUG ADMINISTRATION OFFICE OF REGULATORY AFFAIRS Office of Regulatory Science	Document Number: FORM-000796	Revision #: 00 Revised: 02/21/2020
Title: Cosmetic Talc Sample Chair	n-of-Custody Form	Page 2 of 3

Chain of Custody								
Item #	Date	Released by (Print Name)	Released by (Signature)	Comments/Location				
1-14	2/16/22	Martha H. Schwartz	Mostha Heshwart	ORA/DENL				

		Chain	of Custody	
Item#	Date/Time	Received by (Print Name) (6)	(b) (6)	Comments/Location

Final Disposal Authority				
Authorization for Disposal				
Item(s) #: on this document is/are no longer needed as evidence and is/are authorized for disposal by (check appropriate disposal method)				
☐ Return to Submitter ☐ Destruction Name of Authorizing Official: Date:				
Signature:				

Adapted from: Technical Working Group on Biological Evidence Preservation. The Biological Evidence Preservation Handbook: Best Practices for Evidence Handlers. U.S. Department of Commerce, National Institute of Standards and Technology. 2013.

For the most current and official copy, check QMiS

	FOOD AND DRUG ADMINISTRATION OFFICE OF REGULATORY AFFAIRS Office of Regulatory Science	Document Number: FORM-000796	Revision #: 00 Revised: 02/21/2020
Title: Cosmetic Talc Sample Chain-of-Custody Form			Page 3 of 3

Witness to I	Destruction of Evidence	
Item(s) #: on this document were destro		
in my presence on (date)	.	
in my presence on (date) Name of Witness to destruction:	Signature:	Date:
Release	e to Lawful Owner	
Item(s) #: on this document was/were re	eleased by Evidence Custodian	
Name		
Address:	City:	State:
Zip Code:		
Telephone Number: ()		
Under penalty of law, I certify that I am the lawful or		
Signature:	Date:	
Copy of Government-issued photo identification is a		
This form is to be retained as a permanent record by the Cer	nter for Food Safety and Applied Nutriti	on, Office of Cosmetics and Colors.

Adapted from: Technical Working Group on Biological Evidence Preservation. The Biological Evidence Preservation Handbook: Best Practices for Evidence Handlers. U.S. Department of Commerce, National Institute of Standards and Technology, 2013.

For the most current and official copy, check QMiS

UPS Delivery Confirmation

1 of 1



FOLD HERE

UPS CampusShip | UPS - United States

2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.

. GETTING YOUR SHIPMENT TO UPS
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual

stomers without a Daily Pickup

a your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center,

bes@o r. Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at

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pedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

https://www.campusship.ups.com/cship/create?ActionOriginPair=de...

Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number

1ZA4995A0395125009

Weight

3.00 LBS

Service

UPS Ground

Shipped / Billed On

02/17/2022

Delivered On

02/22/2022 10:00 A.M.

Delivered To

LANHAM, MD, US

Received By



Left At

Inside Delivery

Thank you for giving us this opportunity to serve you. Details are only available for shipments delivered within the last 120 days. Please print for your records if you require this information after 120 days.

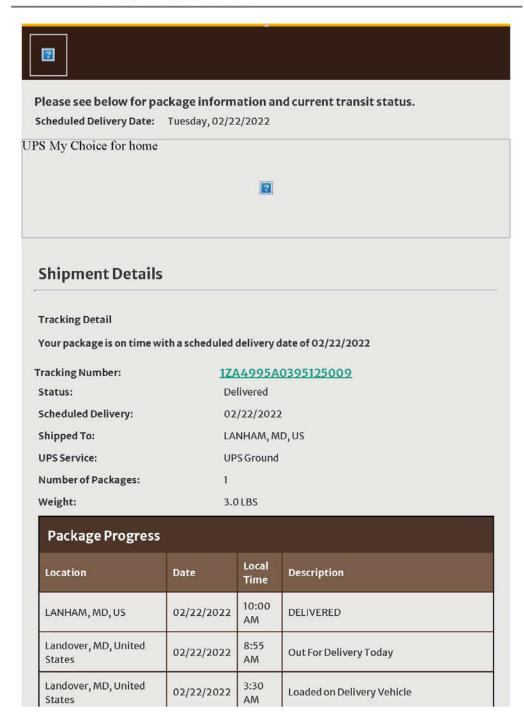
Sincerely,

UPS

Tracking results provided by UPS: 02/23/2022 1:22 P.M. EST

From: To: Subject: Date:

(b) (b) (c) UPS Status NOTIFICATION, Fracking Number 1ZA4995A0395125009 Wednesday, February 23, 2022 1:24:25 PM



Landover, MD, United States	02/22/2022	3:18 AM	Processing at UPS Facility
Landover, MD, United States	02/21/2022	9:45 PM	Arrived at Facility
Laurel, MD, United States	02/21/2022	9:17 PM	Departed from Facility
Laurel, MD, United States	02/21/2022	2:24 PM	Arrived at Facility
Commerce City, CO, United States	02/18/2022	2:51 AM	Departed from Facility
Commerce City, CO, United States	02/17/2022	8:59 PM	Origin Scan
Commerce City, CO, United States	02/17/2022	3:17 PM	Pickup Scan
United States	02/17/2022	9:22 AM	Shipper created a label, UPS has not received the package yet.

Tracking results provided by UPS 02/23/2022 1:24 P.M. Eastern Time

NOTICE: UPS authorizes you to use UPS tracking systems solely to track shipments tendered by or for you to UPS for delivery and for no other purpose. Any other use of UPS tracking systems and information is strictly prohibited.



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Re: FDA Office of Cosmetics & Colors COC 633185

Case Narrative

Client Name: FDA Office of Cosmetics & Colors Contact: John Gasper

Contract Number: 75F40119P10689 **Phone:** (240) 402-1133

Job Name/Location: Assignment DFPG# 22-08 Email: john.gasper@fda.hhs.gov

Batch No. 01212022 (Batch #1)

AMA COC Number: 633185 Date Received: February 22, 2022

AMA Sample No.	Client Sample No.	Sample Description	Analytical Method
633185-1A	01212022-1	Nude colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-1B	01212022-1		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-1C	01212022-1		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-2A	01212022-2	Chocolate colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-2B	01212022-2		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-2C	01212022-2		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-3A	01212022-3	Light nude colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-3B	01212022-3		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-3C	01212022-3		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-4A	01212022-4	Cinnamon colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-4B	01212022-4		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-4C	01212022-4		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-5A	01212022-5	Cream colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-5B	01212022-5		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-5C	01212022-5		Mod. PLM ELAP 198.6/TEM ELAP 198.4

AMA Sample No.	Client Sample No.	Sample Description	Analytical Method
633185-6A	01212022-6	Pink colored, fine powder with a pearlescent appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-6B	01212022-6		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-6C	01212022-6		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-7A	01212022-7	Brown colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-7B	01212022-7		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-7C	01212022-7		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-8A	01212022-8	Brown colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-8B	01212022-8		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-8C	01212022-8		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-9A	01212022-9	Ivory colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-9B	01212022-9		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-9C	01212022-9		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-10A	01212022-10	White colored, fine powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-10B	01212022-10		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-10C	01212022-10		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-11A	01212022-11	White colored, fine powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-11B	01212022-11		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-11C	01212022-11		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-12A	01212022-12	Rose colored, fine powder with a pearlescent appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-12B	01212022-12		Mod. PLM ELAP 198.6/TEM ELAP 198.4

AMA Sample No.	Client Sample No.	Sample Description	Analytical Method
633185-12C	01212022-12		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-13A	01212022-13	Dark burgundy colored, slightly clumpy powder with a slight pearlescent appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-13B	01212022-13		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-13C	01212022-13		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-14A	01212022-14	Copper/bronze colored, fine powder with a pearlescent appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-14B	01212022-14		Mod. PLM ELAP 198.6/TEM ELAP 198.4
633185-14C	01212022-14		Mod. PLM ELAP 198.6/TEM ELAP 198.4

Summary of Samples Received 1

Requested Analyses: PLM Analysis for asbestos fibers conducted by Modified NY ELAP Method 198.6 and TEM Analysis for asbestos fibers conducted by Modified NY ELAP Method 198.4

Sample Receipt Description

The samples were received at AMA Analytical Services, Inc. on February 22, 2022, at 10:00 via UPS Tracking No. 1ZA49958A0395125009 by (b) (6) , who assigned them to Chain of Custody (COC) No. 633185. This COC number served as the internal laboratory job number for tracking purposes. The set consisted of fourteen (14) powder samples submitted in $^{\sim}1$ -oz glass jars; each jar was individually packaged in a vacuum and custody sealed plastic bag, and the jars for samples 7 through 14 additionally sealed with parafilm. Conditions were checked upon receipt and all sample containers and custody seals were intact. The samples were entered into the AMA laboratory database on February 23, 2022, at 12:14 by (b) (6) . The samples were logged in for analysis in triplicate and each sample aliquot was assigned a unique laboratory identification number as shown in the table above. After sample login, the set was transferred to AMA's lockbox for storage.

The following pictures document the condition of samples upon receipt at AMA:









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633185-1A, 1B, 1C/01212022-1



NOTE: COC paperwork indicated that the prefix for sample "1" should've been 01212022, but the sample container was labeled 01202022-1. AMA followed the prefix referenced in the COC on all laboratory documentation relating to this sample.

633185-2A, 2B, 2C/01212022-2



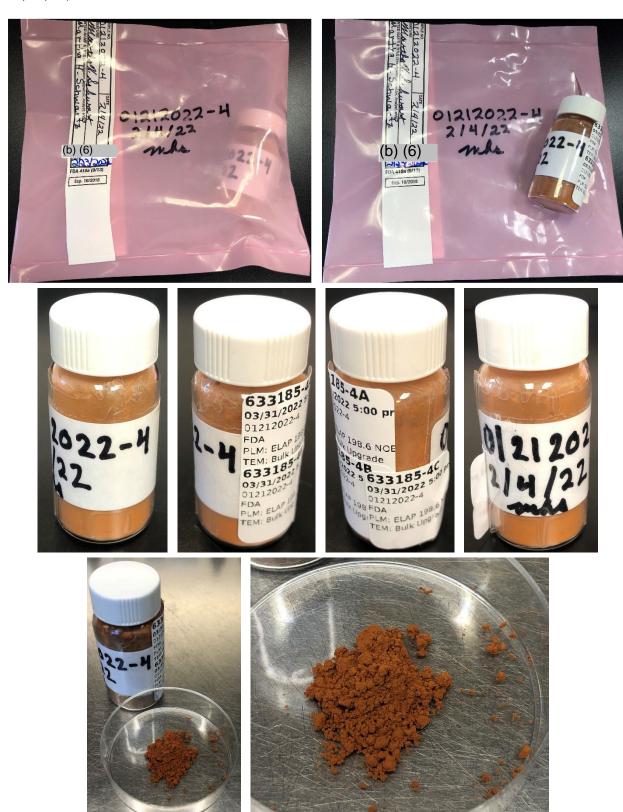
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633185-3A, 3B, 3C/02212022-3



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633185-4A, 4B, 4C/02212022-4



Asbestos · Lead · Mold · Nano

633185-5A, 5B, 5C/01212022-5



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633185-6A, 6B, 6C/01212022-6



Asbestos · Lead · Mold · Nano

633185-7A, 7B, 7C/01212022-7





Asbestos · Lead · Mold · Nano

633185-8A, 8B, 8C/01212022-8



Asbestos · Lead · Mold · Nano

633185-9A, 9B, 9C/01212022-9



Asbestos · Lead · Mold · Nano

633185-10A, 10B, 10C/01212022-10





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633185-11A, 11B, 11C/01212022-11



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633185-12A, 12B, 12C/01212022-12











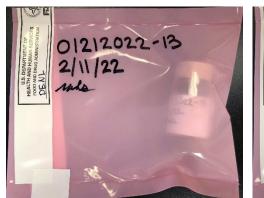




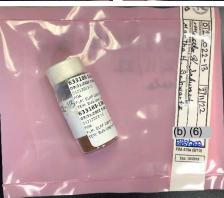


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633185-13A, 13B, 13C/01212022-13





















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633185-14A, 14B, 14C/01212022-14

















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Sample Preparation

Samples were gravimetrically reduced and filtered by (b) (6) on: March 2, 2022 through March 4, 2022, for 633185-1A through 633185-3C, 633185-15DQC, 633185-17RQC, and NB22-169/170; on March 7, 2022 through March 9, 2022, for 633185-4A through 633185-7C, and NB22-175/176; on March 16, 2022 through March 18, 2022, for 633185-8A through 633185-11C, 633185-16RQC, and NB22-194/195; and on March 24, 2022 through March 28, 2022, for 633185-12A through 633185-14C, and NB22-209/210. PLM slide preparations were made by (b) (6) 2022, for 633185-1A through 633185-3C, 633185-15DQ, and 633185-17RQC; March 8, 2022, for 633185-4A through 633185-7C; March 17, 2022, for 633185-8A through 633185-11C, and 633185-16RQC; and March 25, 2022, for 633185-12A through 633185-14C. TEM grid preparations were made by: (b) (6) on March 7, 2022, for 633185-1A through 633185-3C, 633185-15DQC, 633185-17RQC, and NB22-169; (b) (6) on March 9, 2022, for 633185-4A through 633185-7C, NB22-175, and a re-preparation of 633185-4A; (b) (6) on March 21, 2022, for 633185-8A through 633185-11C, 633185-16RQC and NB22-194; and (b) (6) on March 28, 2022, for 6633185-12A through 633185-14C, and NB22-209. 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 jar.
- 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:

The TEM grid preparation for 633185-4A (associated with EB-58086) was initially performed without separating the backing pad from the 0.22 μ m MCE filter. A second TEM grid preparation (associated with EB-58090) was made after separating the backing pad from the filter.

No other problems were encountered during preparation. All gravimetric data was consistent among each group of aliquots and all other 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 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 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

 $VF(mI)*IW(g)*AA(mm^2)*RJ(g)$ (The calculated TEM 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

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 0.5×0.04 -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

633185-1A, 1B, 1C/Client Sample: 01212022-1

PLM

All three aliquots of sample 01212022-1 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-1A No Asbestos Detected 633185-1B No Asbestos Detected 633185-1C No Asbestos Detected

TEM

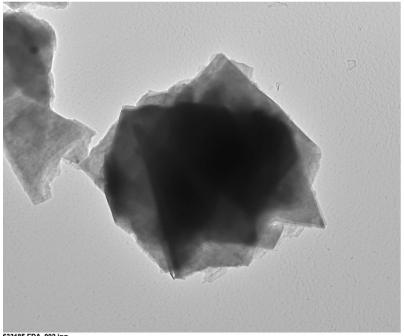
(b) (6) analyzed aliquot 1A on March 7, 2022. (b) (6) analyzed aliquots 1B and 1C on March 7, 2022. The primary particle observed was talc; mica and iron particles were also observed along with talc ribbons and particles containing phosphorus and calcium. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-1A No Asbestos Detected 633185-1B No Asbestos Detected

633185-1C 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.

633185-1A, Talc Particle

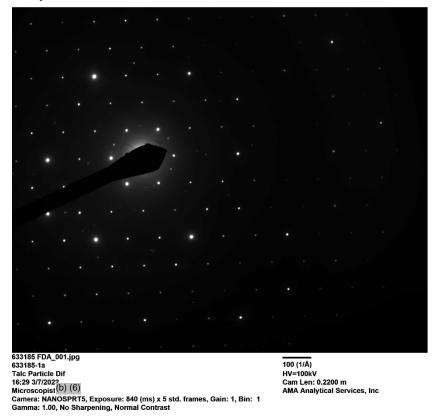


633185 FDA 002.jpg

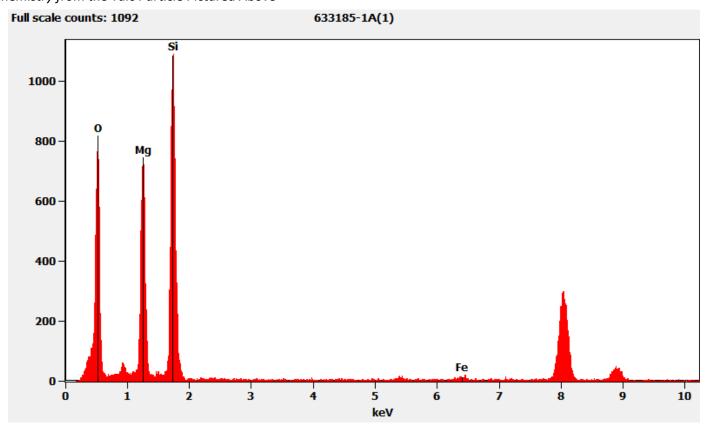
633185 FDA_002.jpg
633185-1a
Talc Particle
Cal: 0.003702 µm/pix
16:30 377/2022
Microscopist (b) (6)
Camera: NANOSPRT5, Exposure: 840 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

1 μm HV=100kV Direct Mag: 2900 x AMA Analytical Services, Inc

Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

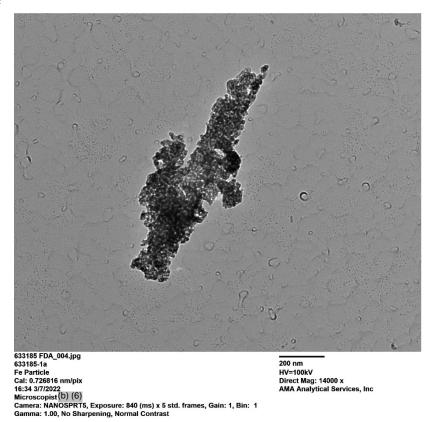


Chemistry from the Talc Particle Pictured Above



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633185-1A, Iron Particle

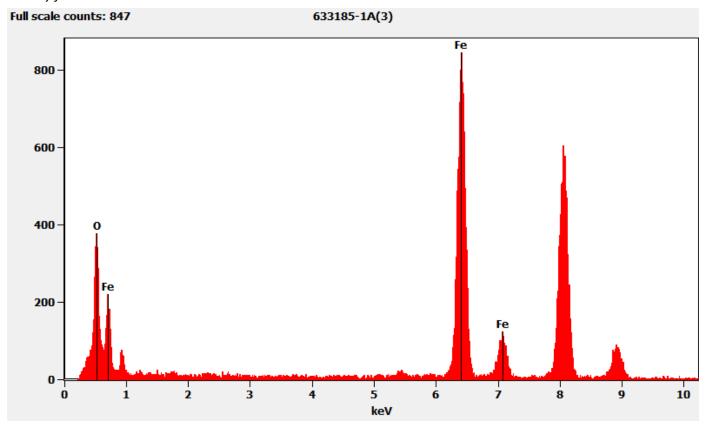


Diffraction Pattern from the Iron Particle Pictured Above

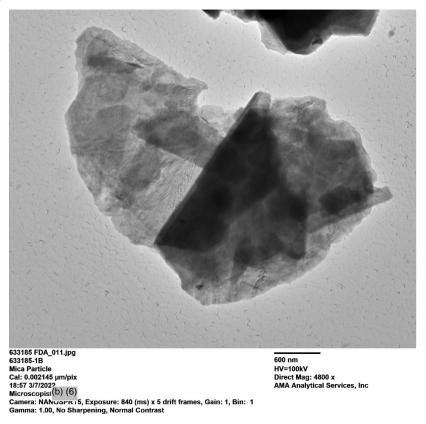


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Chemistry from the Iron Particle Pictured Above

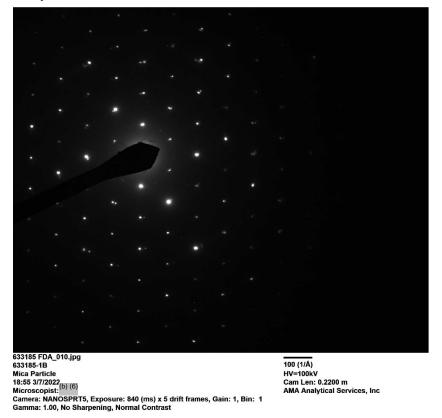


633185-1B, Mica Particle

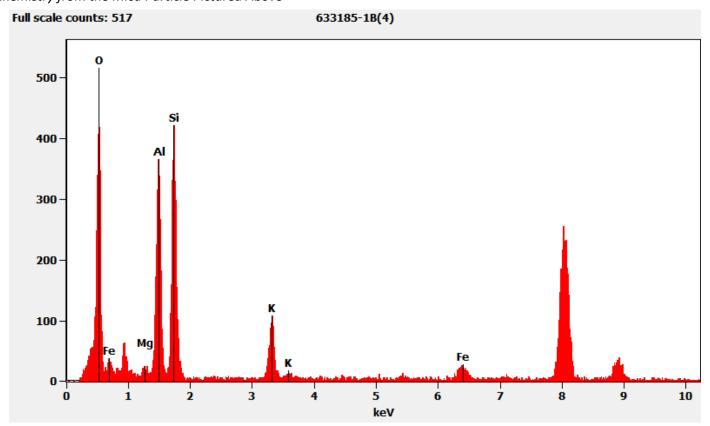


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Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

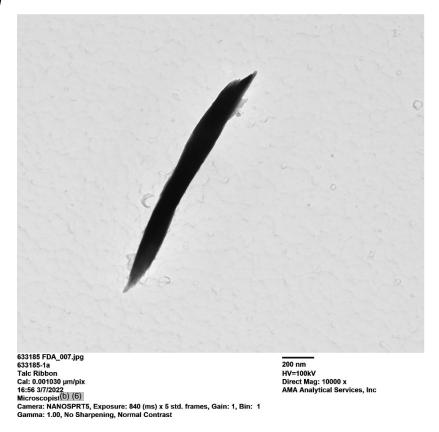


Chemistry from the Mica Particle Pictured Above



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633185-1A, Talc Ribbon

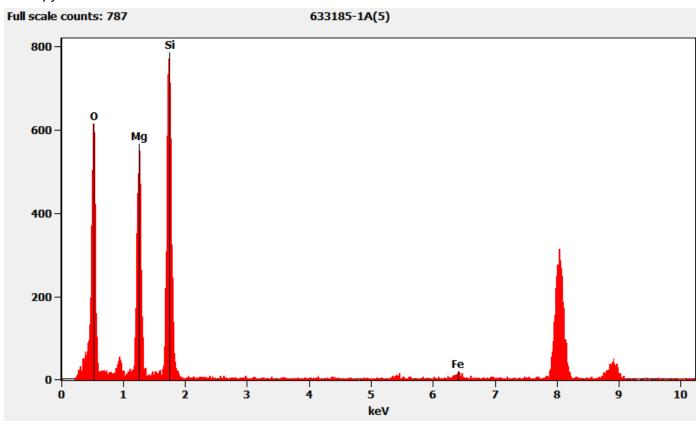


Diffraction Pattern from the Talc Ribbon Pictured Above

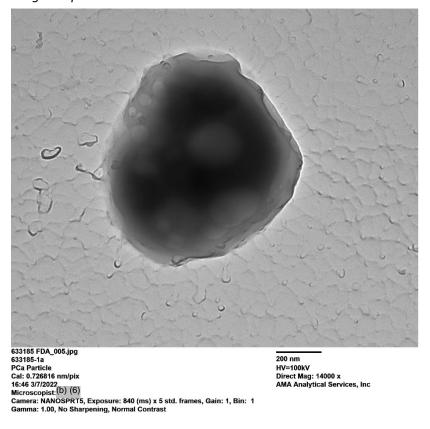


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Chemistry from the Talc Ribbon Pictured Above

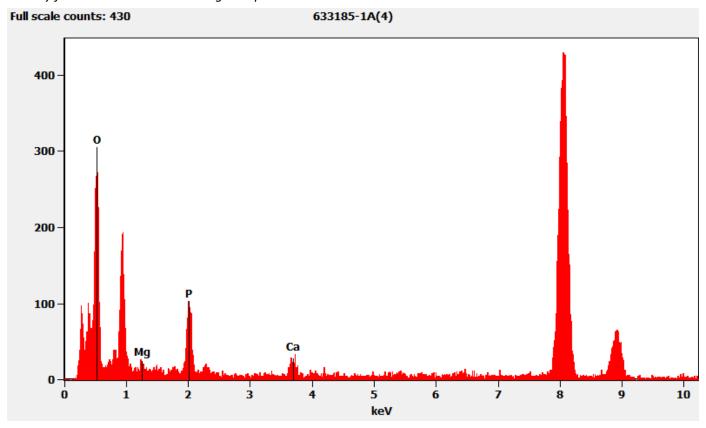


633185-1A, Particle Containing Phosphorus and Calcium



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Chemistry from the Particle Containing Phosphorus and Calcium Pictured Above



633185-2A, 2B, 2C/Client Sample: 01212022-2

PLM

All three aliquots of sample 01212022-2 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-2A	No Asbestos Detected
633185-2B	No Asbestos Detected
633185-2C	No Asbestos Detected

TEM

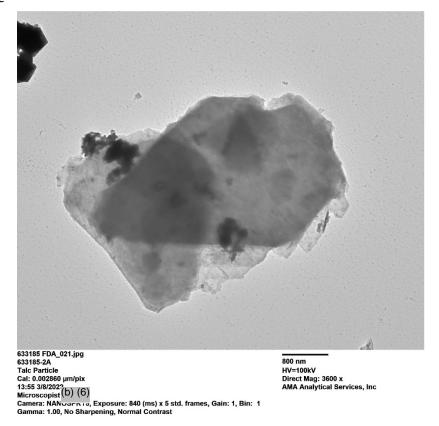
(b) (6) analyzed aliquots 2A, 2B, and 2C on March 8, 2022. The primary particle observed was talc; iron particles were also observed along with mica particles, copper particles, and talc ribbons. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-2A	No Asbestos Detected
633185-2B	No Asbestos Detected
633185-2C	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.

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633185-2A, Talc Particle

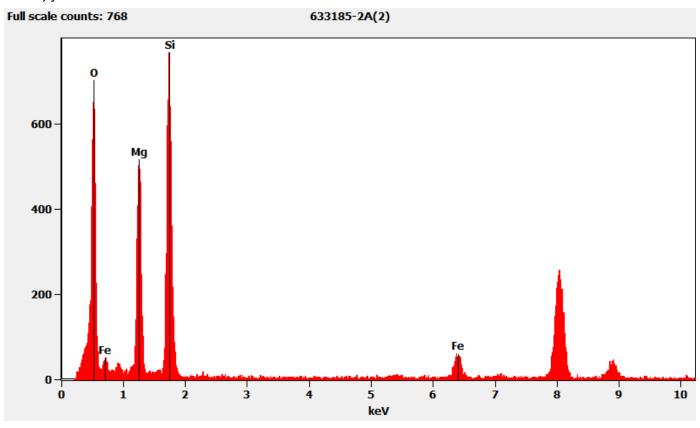


Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

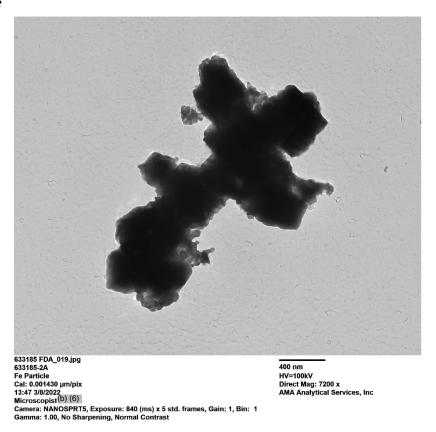


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Chemistry from the Talc Particle Pictured Above



633185-2A, Iron Particle

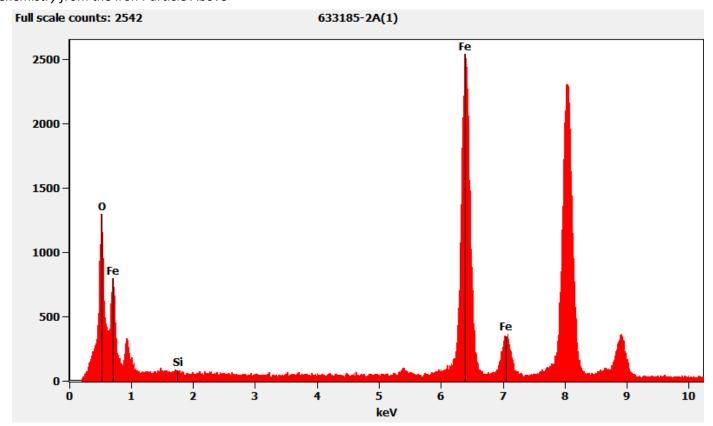


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Diffraction Pattern from the Iron Particle Pictured Above

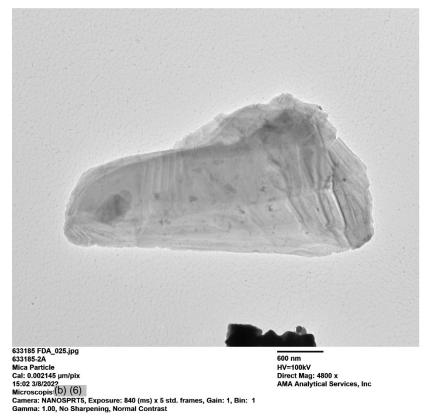


Chemistry from the Iron Particle Above



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633185-2A, Mica Particle

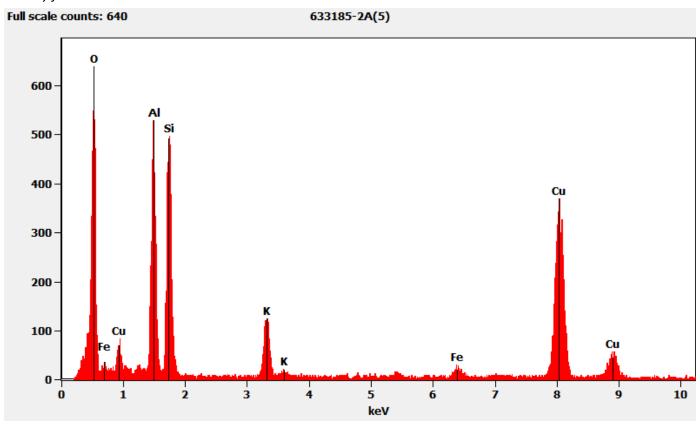


Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

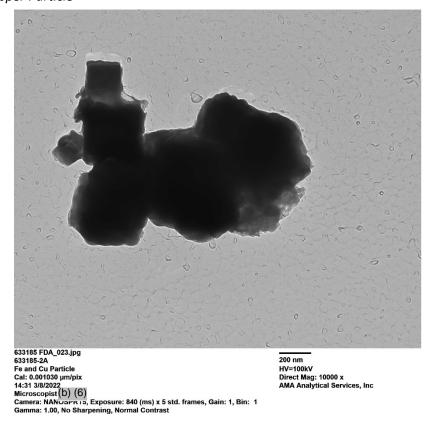


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Chemistry from the Mica Particle Pictured Above



633185-1A, Iron and Copper Particle

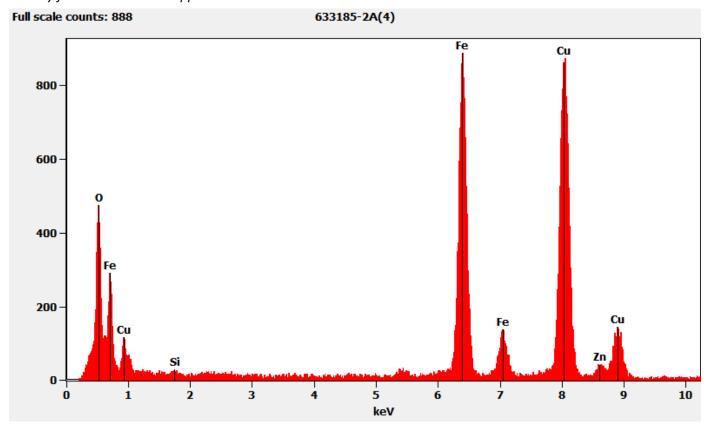


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Diffraction Pattern from the Iron and Copper Particle Pictured Above

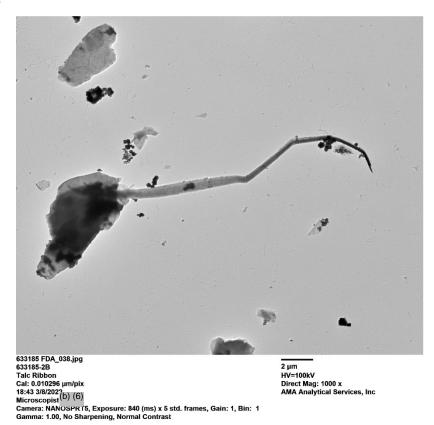


Chemistry from the Iron and Copper Particle Pictured Above

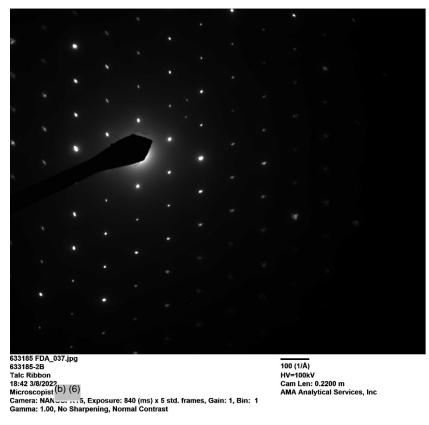


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633185-2A, Talc Ribbon

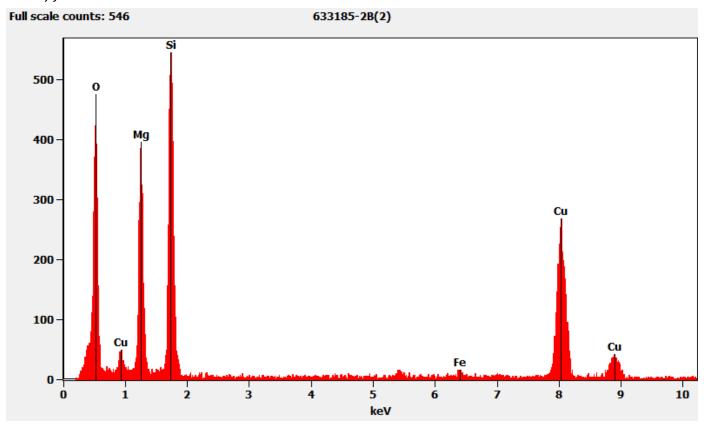


Diffraction Pattern from the Talc Ribbon Pictured Above



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Chemistry from the Talc Ribbon Pictured Above



633185-3A, 3B, 3C/Client Sample: 01212022-3

PLM

All three aliquots of sample 01212022-3 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-3A	No Asbestos Detected
633185-3B	No Asbestos Detected
633185-3C	No Asbestos Detected

TEM

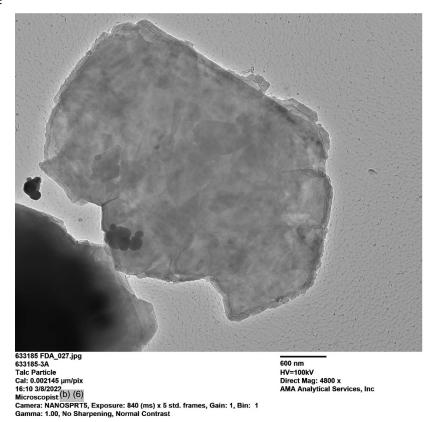
(b) (6) analyzed aliquot 3A on March 8, 2022, and aliquots 3B and 3C on March 9, 2022. The primary particle observed was talc; titanium particles were also observed along with mica particles, and talc ribbons/fibers. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-3A	No Asbestos Detected
633185-3B	No Asbestos Detected
633185-3C	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.

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633185-3A, Talc Particle

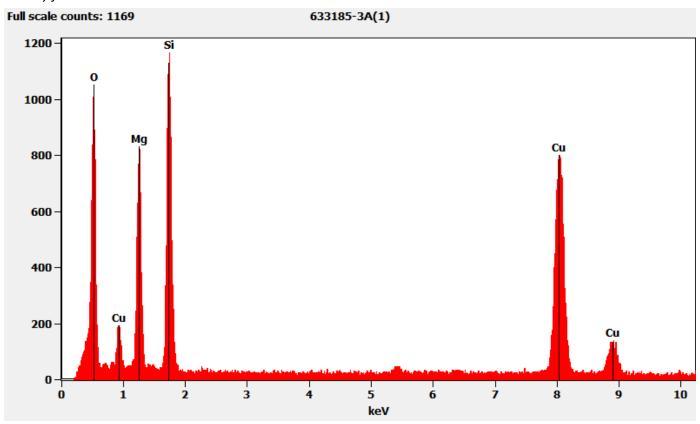


Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

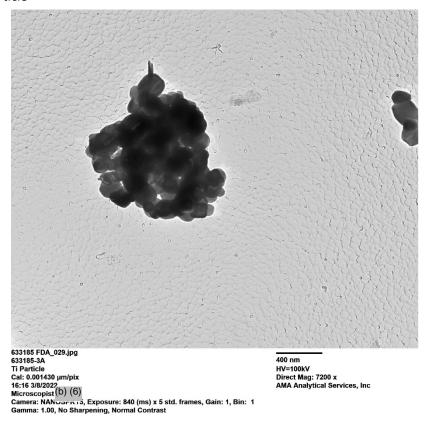


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Chemistry from the Talc Particle Pictured Above



633185-3A, Titanium Particle

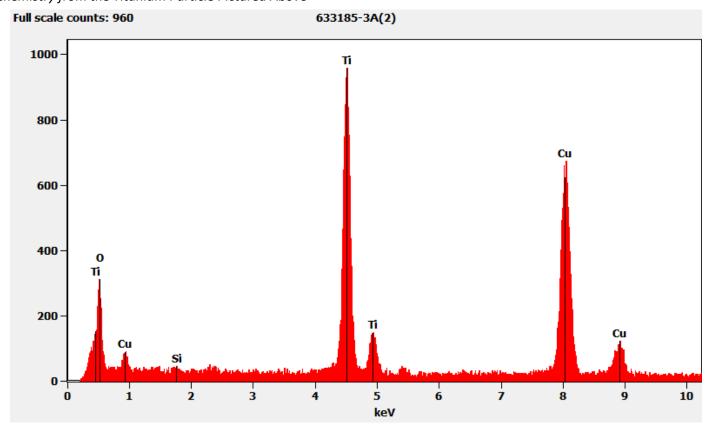


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Diffraction Pattern from the Titanium Particle Pictured Above

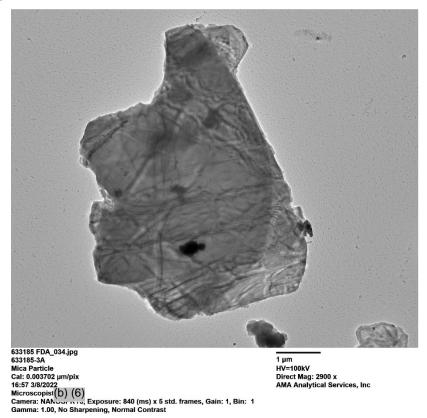


Chemistry from the Titanium Particle Pictured Above



Asbestos · Lead · Mold · Nano

633185-3A, Mica Particle

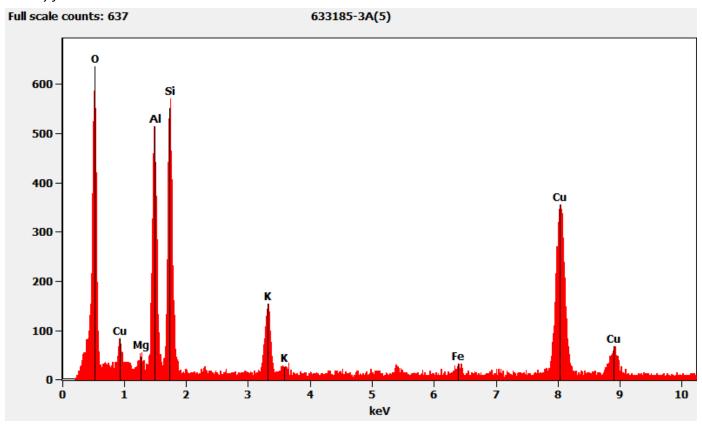


Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

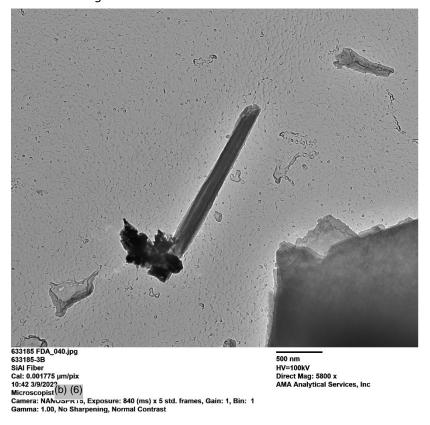


Asbestos · Lead · Mold · Nano

Chemistry from the Mica Particle Pictured Above

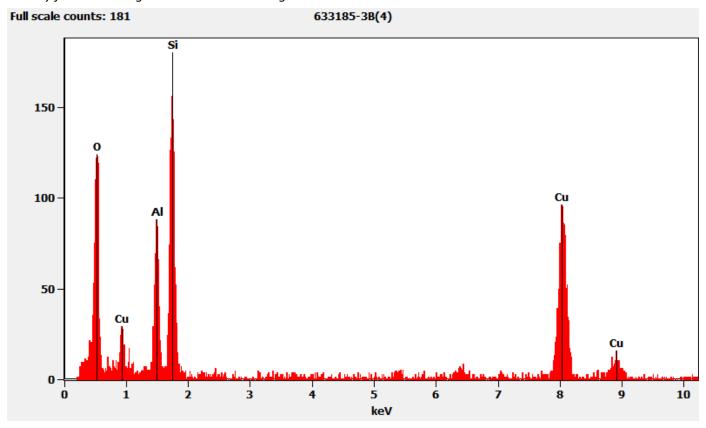


633185-3B, Elongated Particle Containing Aluminon and Silicon

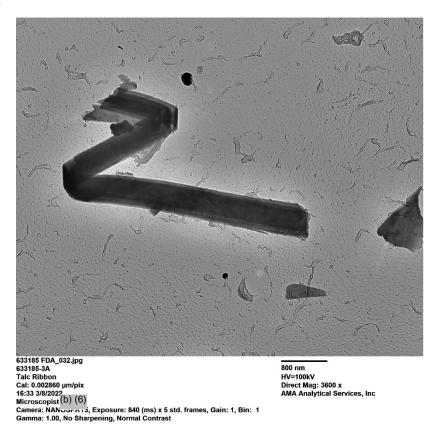


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Chemistry from the Elongated Particle Containing Aluminum and Silicon Pictured Above



633185-3A, Talc Ribbon

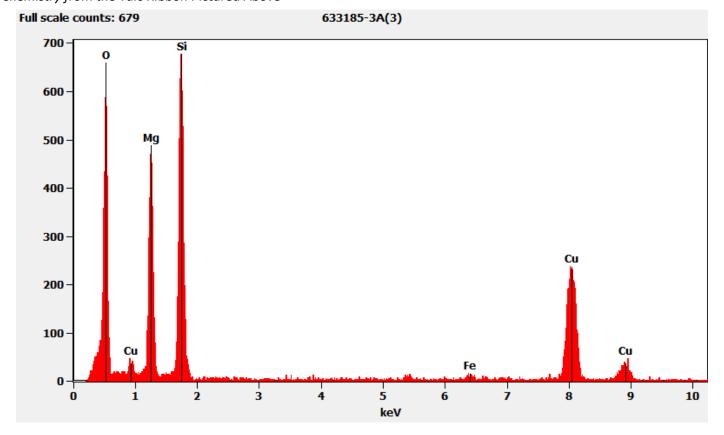


Asbestos · Lead · Mold · Nano

Diffraction Pattern from the Talc Ribbon Pictured Above

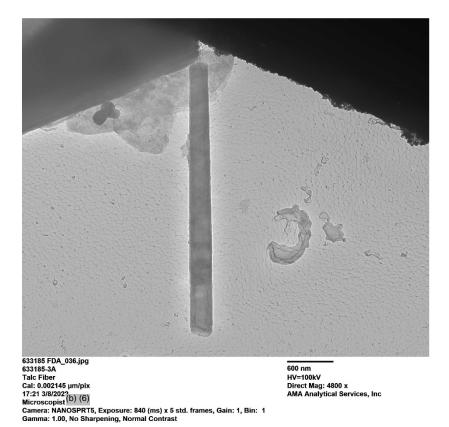


Chemistry from the Talc Ribbon Pictured Above



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633185-3A, Talc Fiber

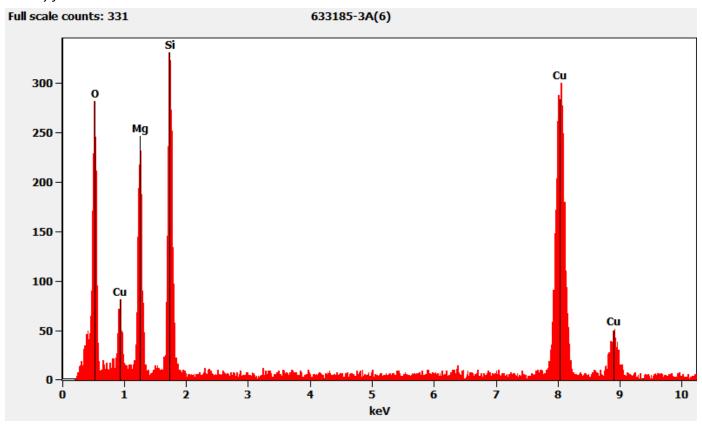


Hexagonal Diffraction Pattern from the Talc Fiber Pictured Above



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Chemistry from the Talc Fiber Pictured Above



633185-4A, 4B, 4C/Client Sample: 01212022-4

PLM

All three aliquots of sample 01212022-4 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-4A	No Asbestos Detected
633185-4B	No Asbestos Detected
633185-4C	No Asbestos Detected

TEM

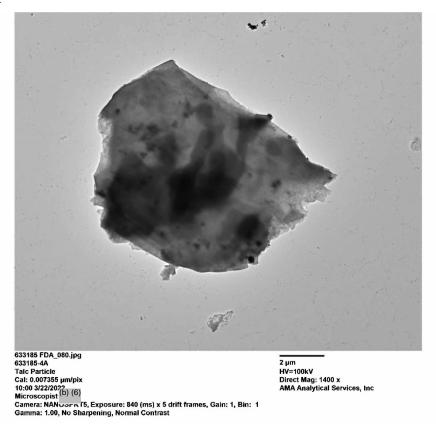
(b) (6) analyzed aliquot 4A on March 22, 2022. (b) (6) analyzed aliquots 4B and 4C on March 22, 2022. The primary particle observed was talc; iron particles were also observed along with mica particles and talc fibers. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-4A	No Asbestos Detected
633185-4B	No Asbestos Detected
633185-4C	No Asbestos Detected

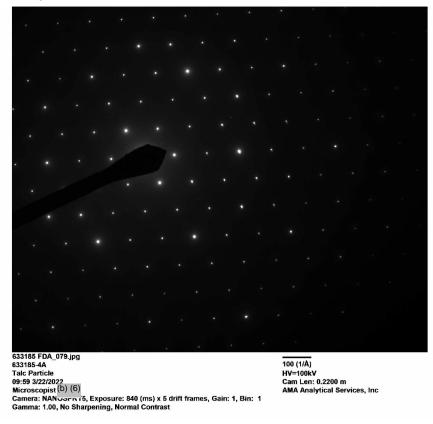
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

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633185-4A, Talc Particle

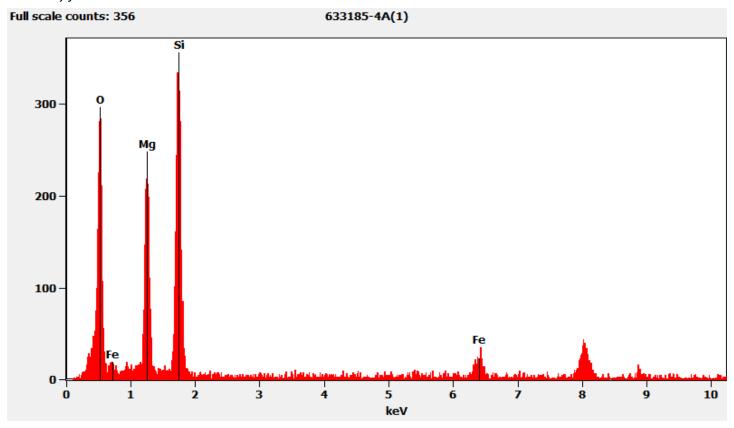


Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

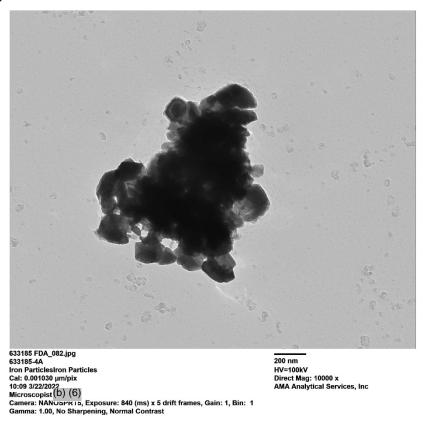


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Chemistry from the Talc Particle Pictured Above



633185-4A, Iron Particles

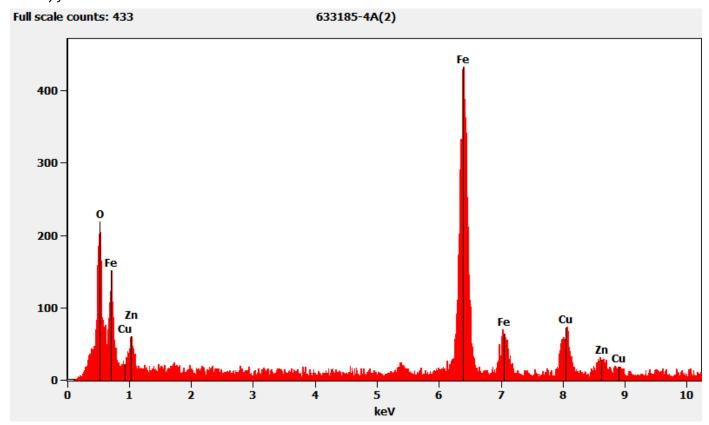


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Diffraction from the Iron Particles Pictured Above



Chemistry from the Iron Particles Pictured Above



633185-4A, Elongated Iron Particle

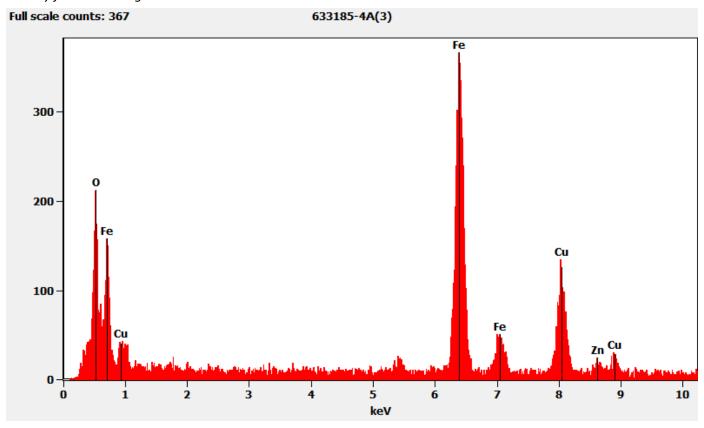


Diffraction Pattern from the Elongated Iron Particle Pictured Above

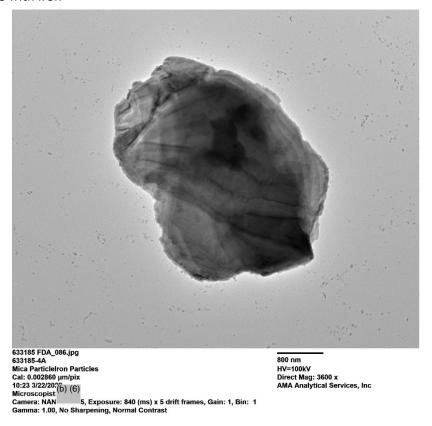


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Chemistry from the Elongated Iron Particle Pictured Above



633185-4A, Mica Particle with Iron

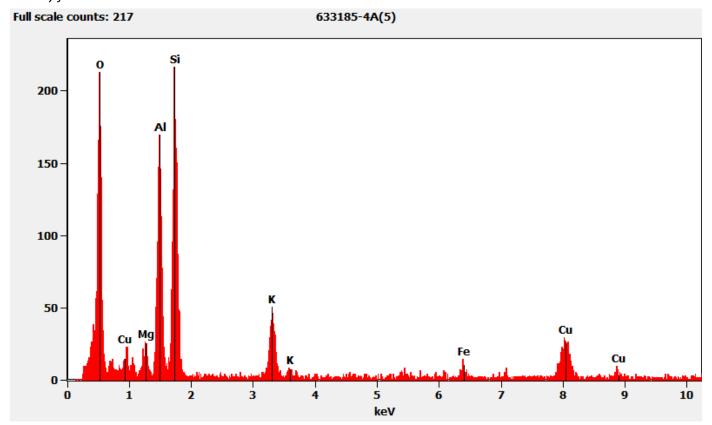


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Hexagonal Diffraction from the Mica Particle with Iron Pictured Above

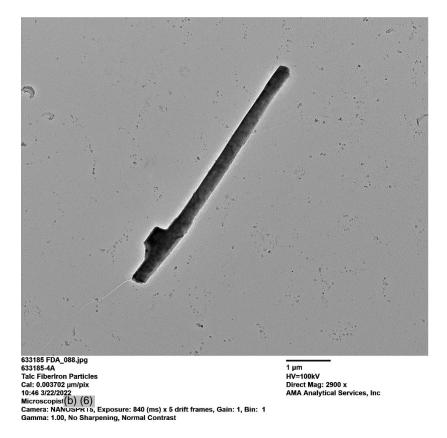


Chemistry from the Mica Particle with Iron Pictured Above

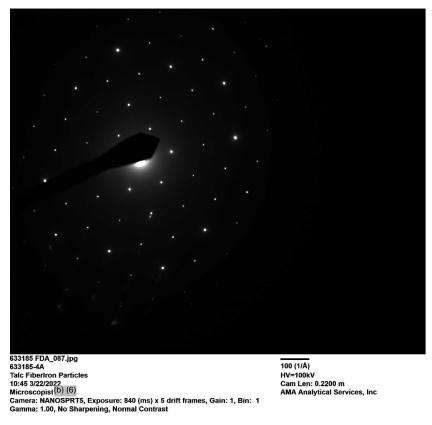


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633185-4A, Talc Fiber

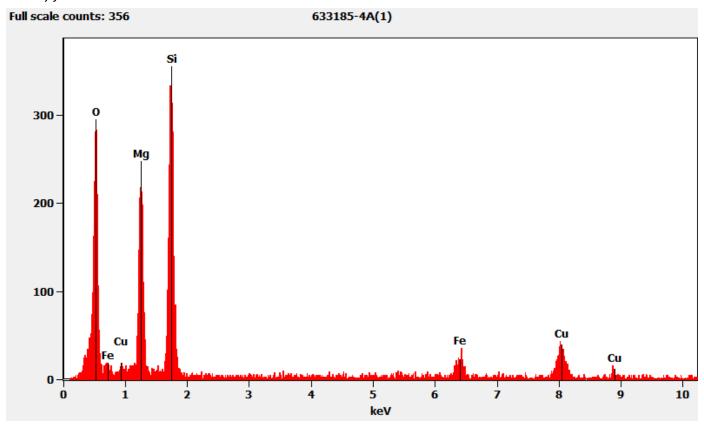


Hexagonal Diffraction from the Talc Fiber Pictured Above

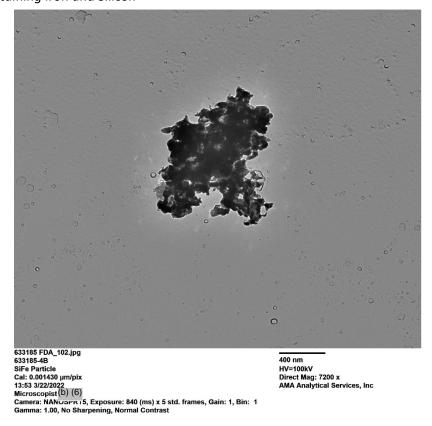


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Chemistry from the Talc Fiber Pictured Above



633185-4B, Particle Containing Iron and Silicon

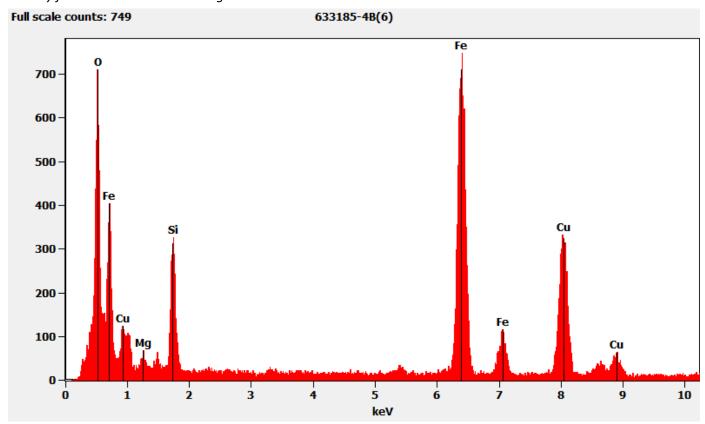


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Diffraction from the Particle Containing Iron and Silicon Pictured Above



Chemistry from the Particle Containing Iron and Silicon Pictured Above



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633185-5A, 5B, 5C/Client Sample: 01212022-5

PLM

All three aliquots of sample 01212022-5 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-5A	No Asbestos Detected
633185-5B	No Asbestos Detected
633185-5C	No Asbestos Detected

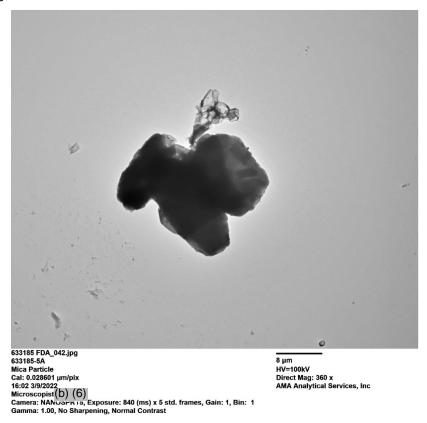
TEM

(b) (6) analyzed aliquots 5A and 5B on March 9, 2022, and aliquot 5C on March 11, 2022. The primary particle observed was mica; iron and titanium particles were also observed along with calcium particles, talc 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.

633185-5A	No Asbestos Detected
633185-5B	No Asbestos Detected
633185-5C	No Asbestos Detected

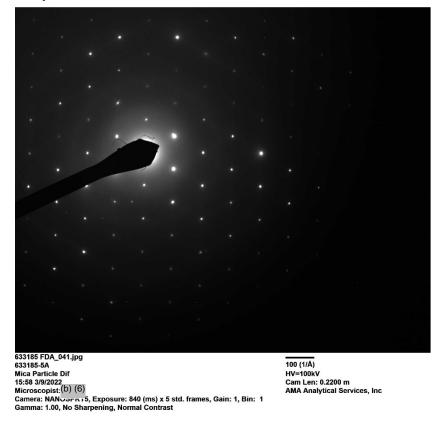
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

633185-5A, Mica Particle

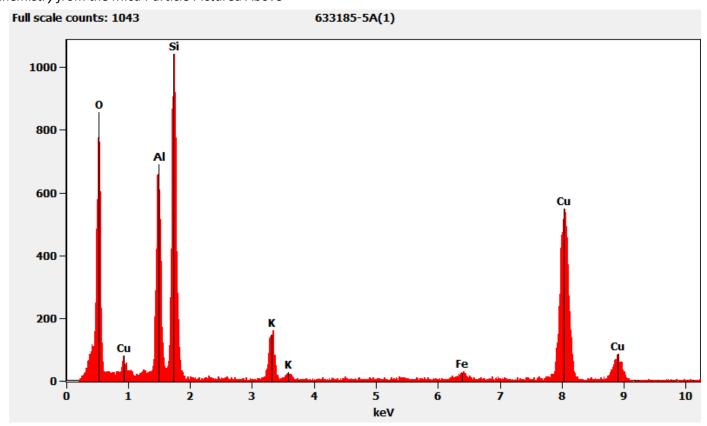


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Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

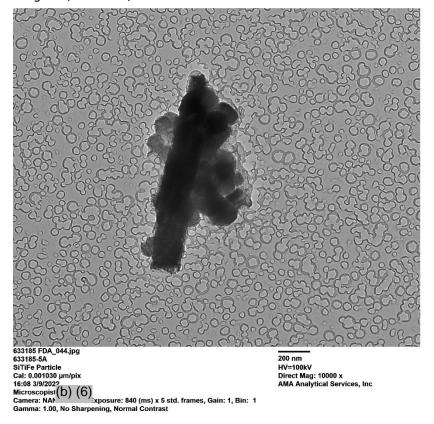


Chemistry from the Mica Particle Pictured Above

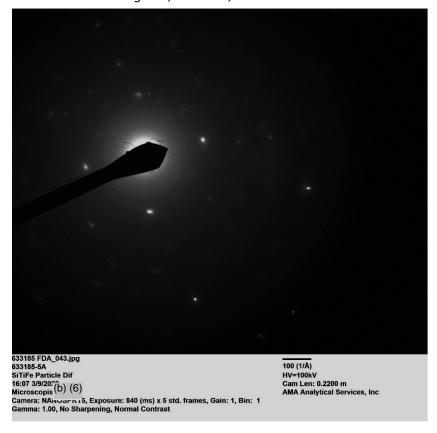


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633185-5A, Particle Containing Iron, Titanium, and Silicon

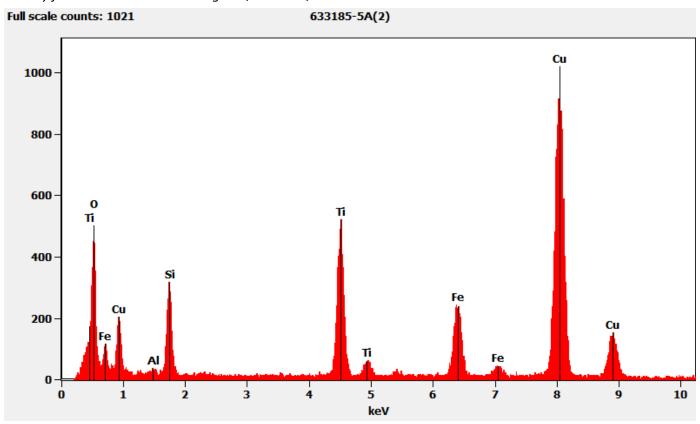


Diffraction Pattern from the Particle Containing Iron, Titanium, and Silicon Pictured Above

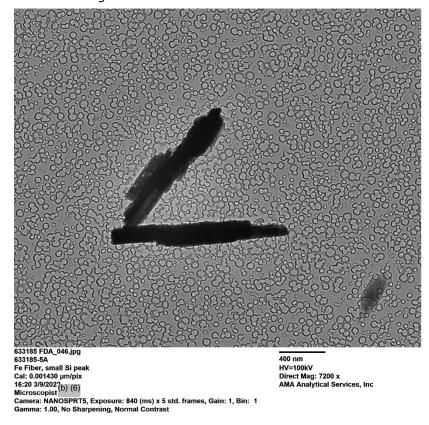


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Chemistry from the Particle Containing Iron, Titanium, and Silicon Pictured Above



633185-5A, Elongated Particle Containing Iron and Silicon

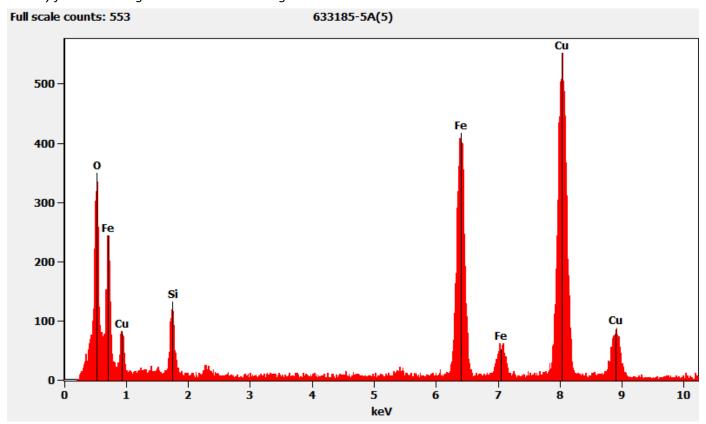


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Diffraction Pattern from the Elongated Particle Containing Iron and Silicon Pictured Above

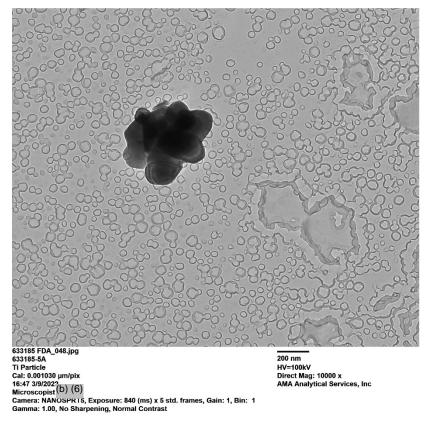


Chemistry from the Elongated Particle Containing Iron and Silicon Pictured Above



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633185-5A, Titanium Particle

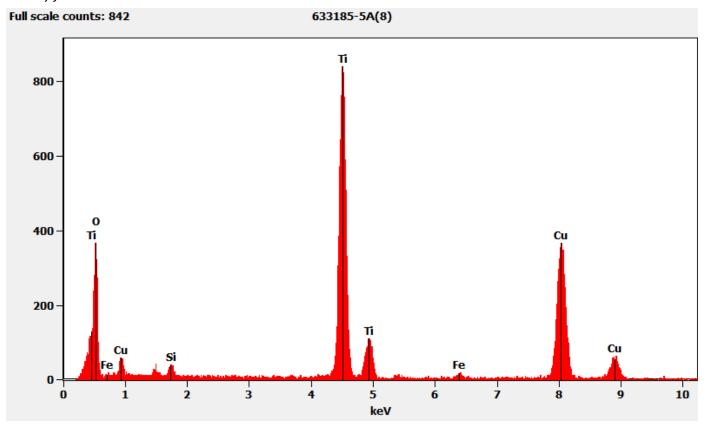


Diffraction Pattern from the Titanium Particle Pictured Above

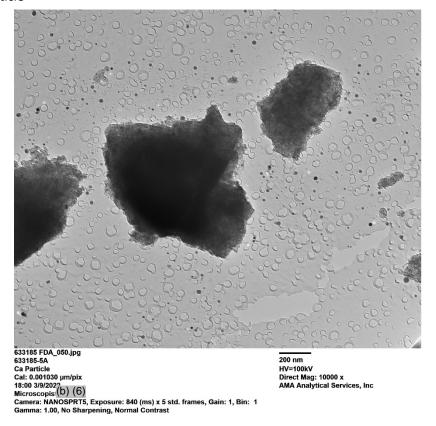


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Chemistry from the Titanium Particle Pictured Above



633185-5B, Calcium Particle

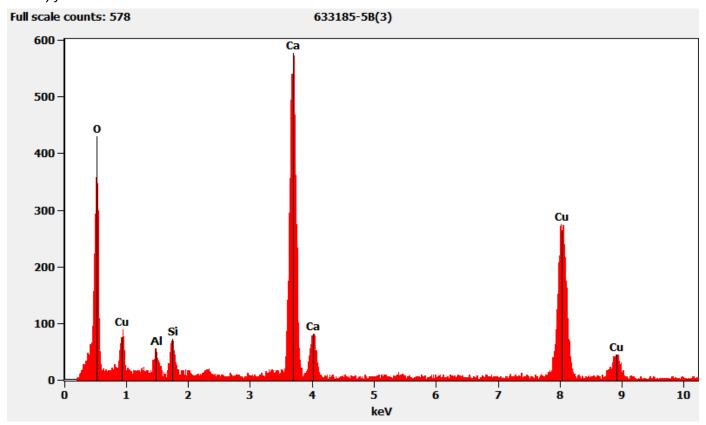


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Diffraction Pattern from the Calcium Particle Pictured Above

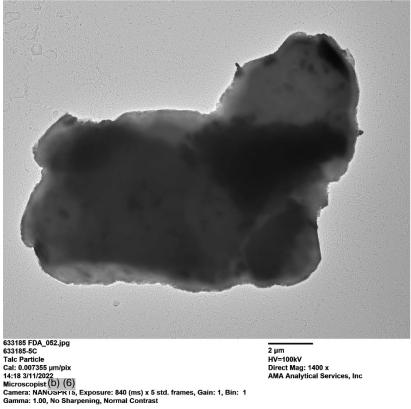


Chemistry from the Calcium Particle Pictured Above



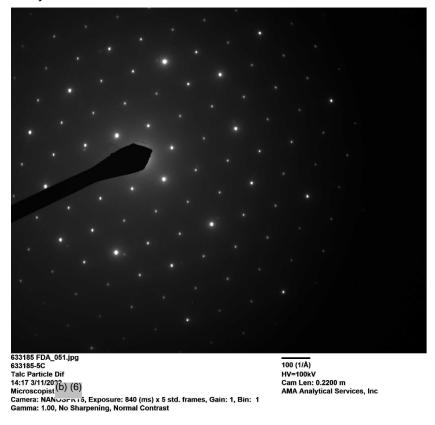
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633185-5C, Talc Particle



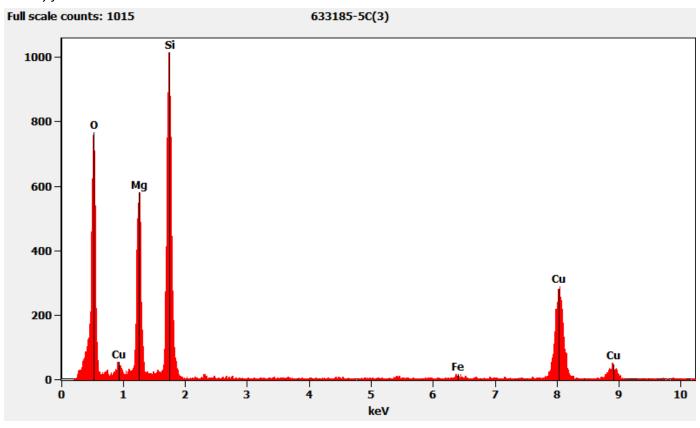
2 μm HV=100kV Direct Mag: 1400 x AMA Analytical Services, Inc

Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

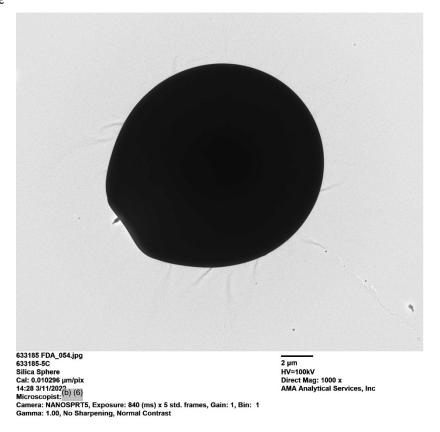


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Chemistry from the Talc Particle Pictured Above

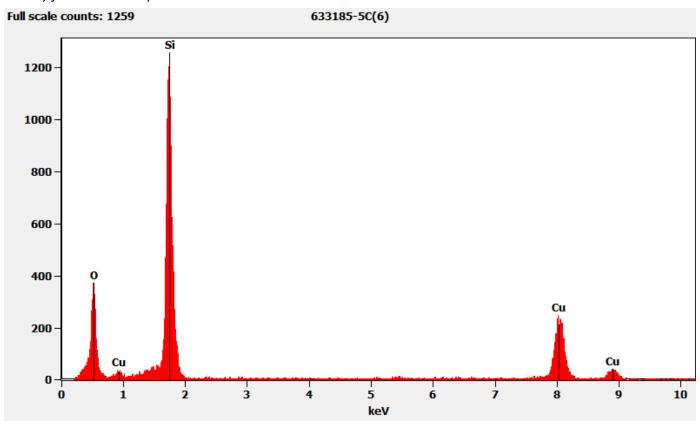


633185-5C, Silica Sphere



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Chemistry from the Silica Sphere Pictured Above



633185-6A, 6B, 6C/Client Sample: 01212022-6

PLM

All three aliquots of sample 01212022-6 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-6A	No Asbestos Detected
633185-6B	No Asbestos Detected
633185-6C	No Asbestos Detected

TEM

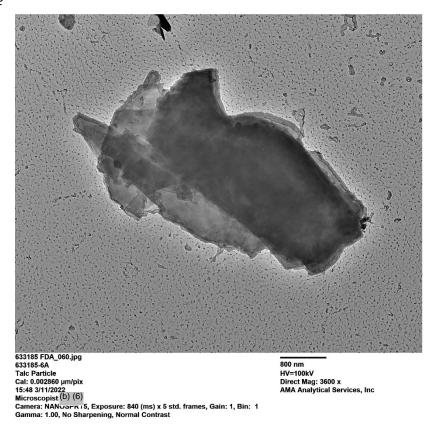
(b) (6) analyzed aliquot 6A March 11, 2022. (b) (6) analyzed aliquots 6B and 6C on March 15, 2022. The primary particle observed was talc; titanium particles were also observed along with particles containing silicon, aluminum, potassium, titanium, iron, and magnesium, iron particles, mica particles, and talc 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.

633185-6A	No Asbestos Detected
633185-6B	No Asbestos Detected
633185-6C	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.

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633185-6A, Talc Particle

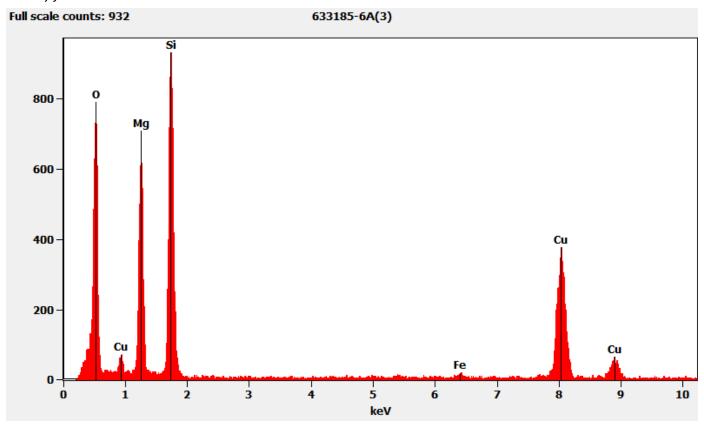


Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

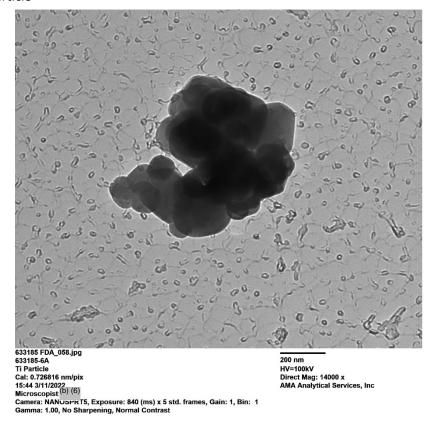


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Chemistry from the Talc Particle Pictured Above



633185-6A, Titanium Particle

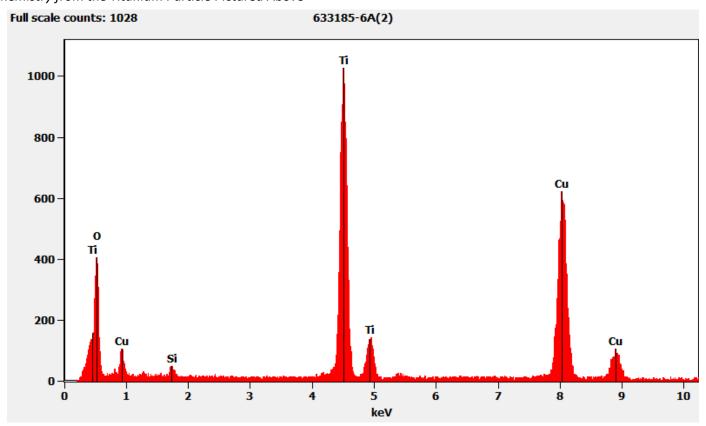


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Diffraction Pattern from the Titanium Particle Pictured Above

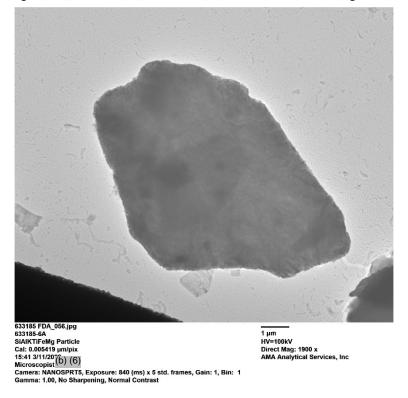


Chemistry from the Titanium Particle Pictured Above



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633185-6A, Particle Containing Silicon, Aluminum, Potassium, Titanium, Iron, and Magnesium

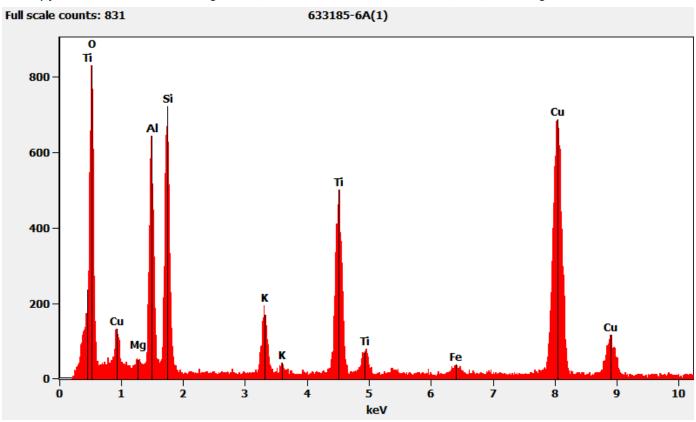


Diffraction Pattern from the Particle Containing Silicon, Aluminum, Potassium, Titanium, Iron, and Magnesium Pictured Above

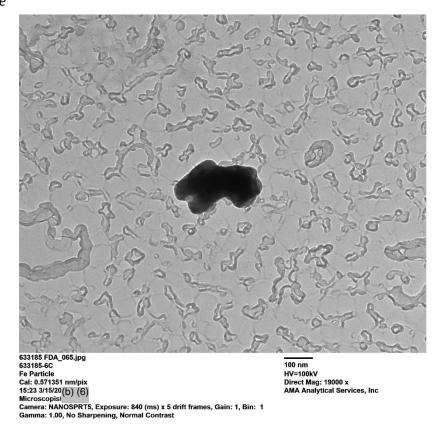


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Chemistry from the Particle Containing Silicon, Aluminum, Potassium, Titanium, Iron, and Magnesium Pictured Above



633185-6C, Iron Particle

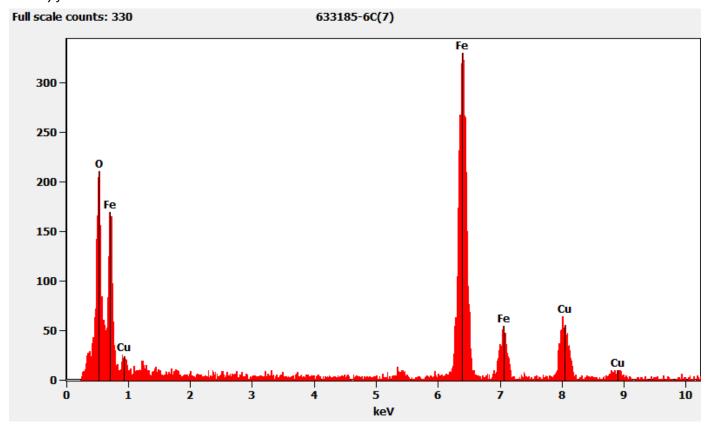


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Diffraction Pattern from the Iron Particle Pictured Above

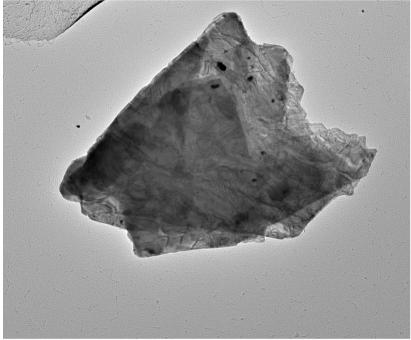


Chemistry from the Iron Particle Pictured Above



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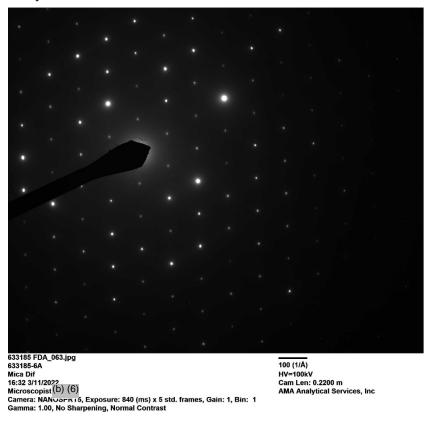
633185-6A, Mica Particle



633185 FDA_064.jpg 633185-6A Mica Cal: 0.007355 µm/pix 16:32 3/11/2022 Microscopist (6) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

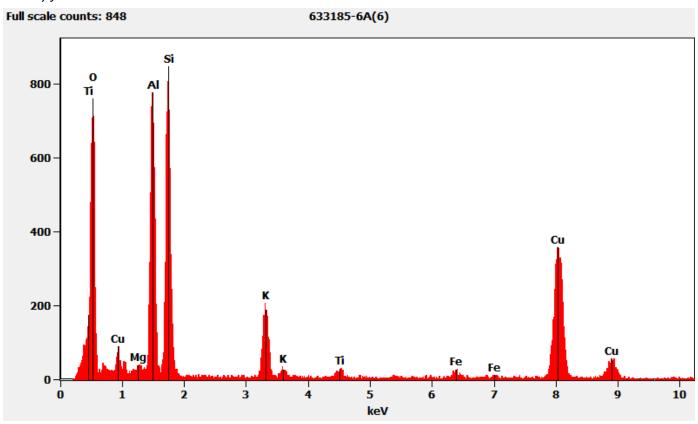
2 μm HV=100kV Direct Mag: 1400 x AMA Analytical Services, Inc

Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

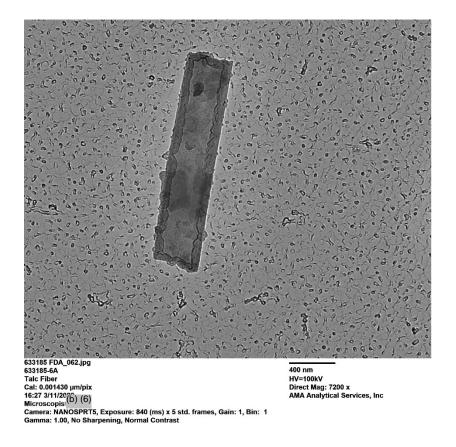


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Chemistry from the Mica Particle Pictured Above



633185-6A, Talc Fiber

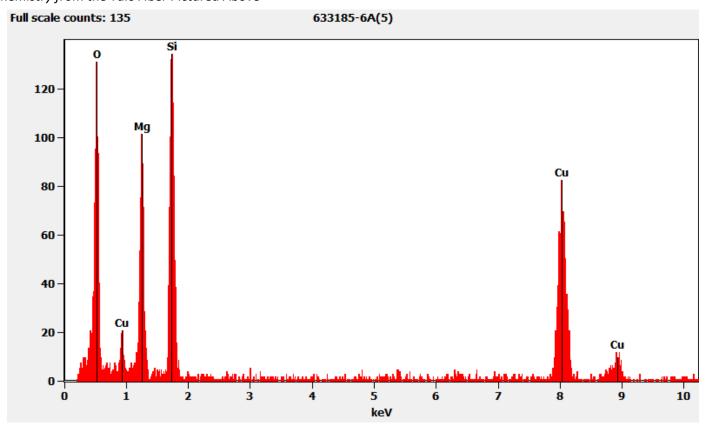


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Hexagonal Diffraction Pattern from the Talc Fiber Pictured Above



Chemistry from the Talc Fiber Pictured Above



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633185-7A, 7B, 7C/Client Sample: 01212022-7

PIM

All three aliquots of sample 01212022-7 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-7A	No Asbestos Detected
633185-7B	No Asbestos Detected
633185-7C	No Asbestos Detected

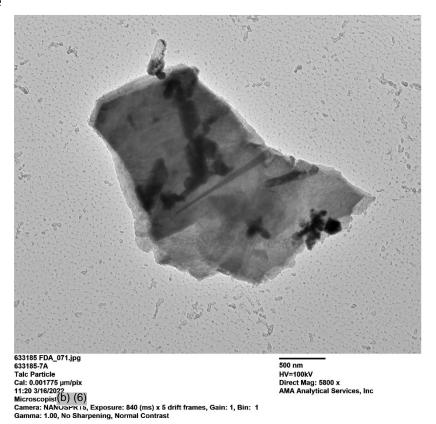
TEM

(b) (6) analyzed aliquot 7A on March 16, 2022. Andreas Saldivar analyzed aliquot 7B on March 17, 2022, and aliquot 7C on March 18, 2022. The primary particle observed was talc; silica spheres, titanium and iron particles were also observed along with mica 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.

633185-7A	No Asbestos Detected
633185-7B	No Asbestos Detected
633185-7C	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.

633185-7A, Talc Particle

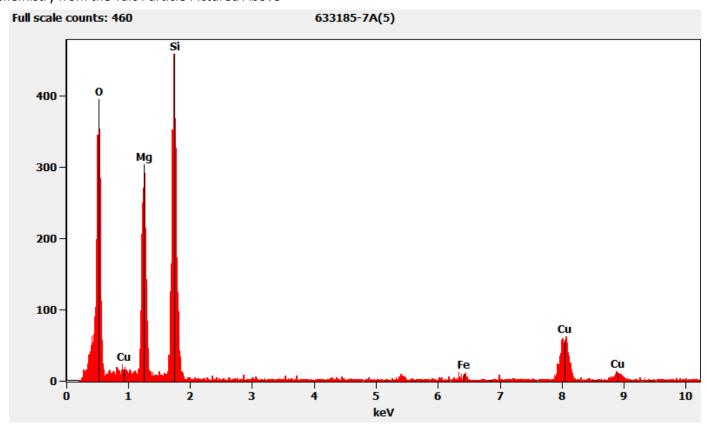


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Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

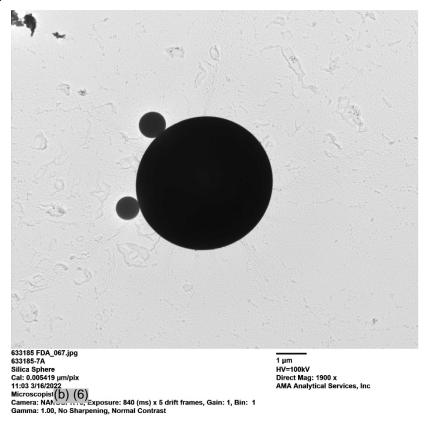


Chemistry from the Talc Particle Pictured Above

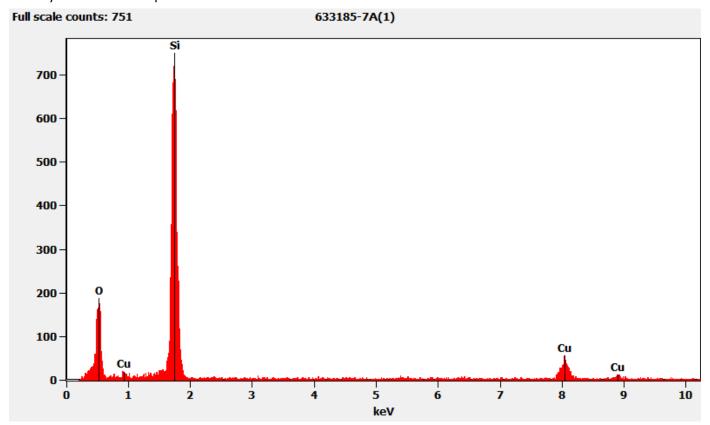


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633185-7A, Silica Sphere

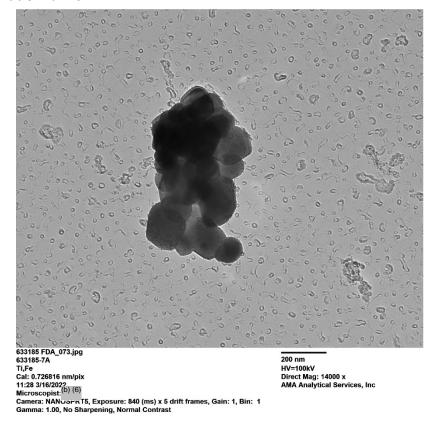


Chemistry from the Silica Sphere Pictured Above



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633185-7A, Titanium Particle with Iron

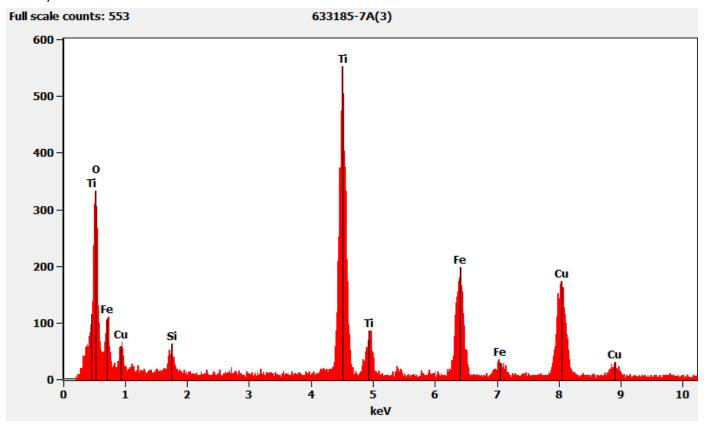


Diffraction Pattern from the Titanium Particle with Iron Pictured Above

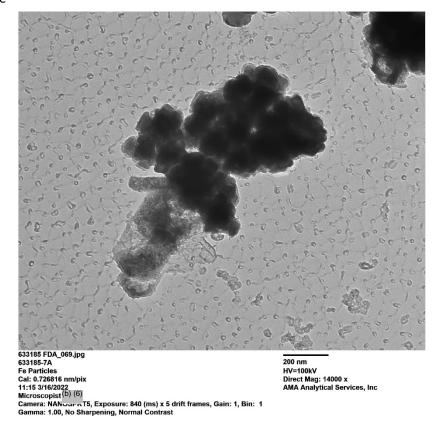


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Chemistry from the Titanium Particle with Iron Pictured Above



633185-7A, Iron Particle

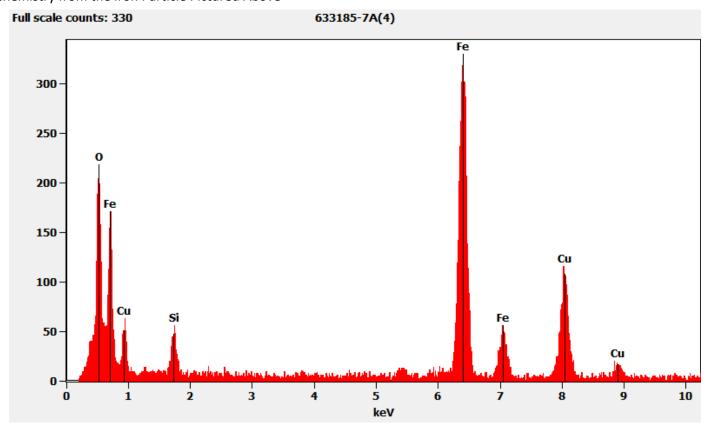


Asbestos · Lead · Mold · Nano

Diffraction Pattern from the Iron Particle Pictured Above

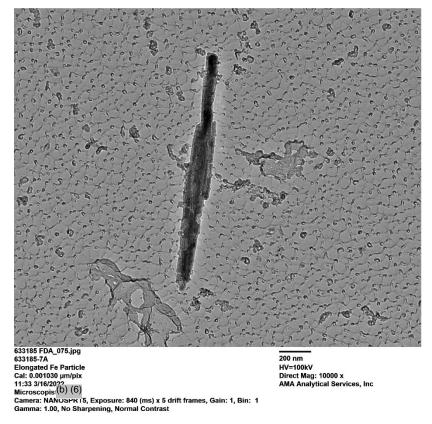


Chemistry from the Iron Particle Pictured Above



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633185-7A, Elongated Iron Particle

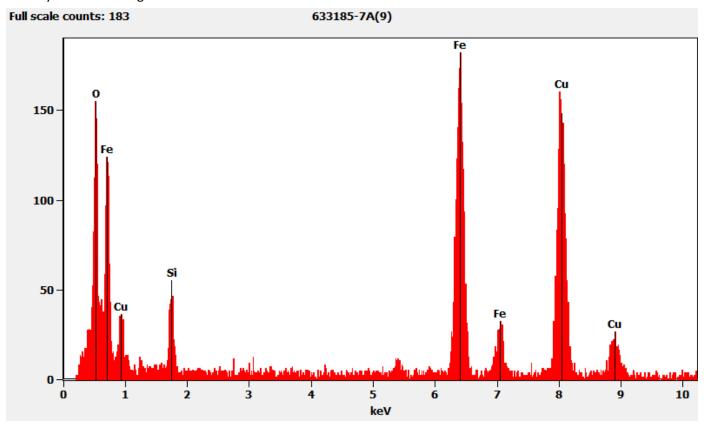


Diffraction Pattern from the Elongated Iron Particle Pictured Above

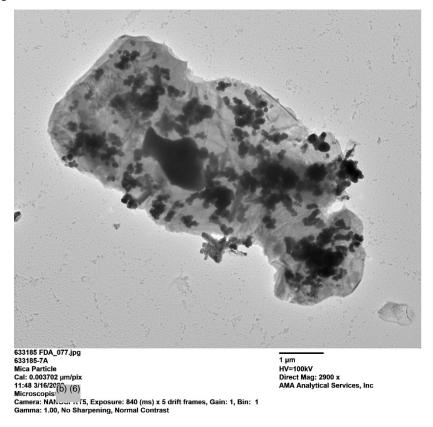


Asbestos · Lead · Mold · Nano

Chemistry from the Elongated Iron Particle Pictured Above

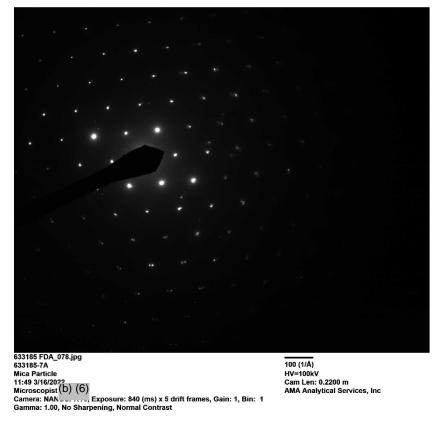


633185-7A, Mica Particle

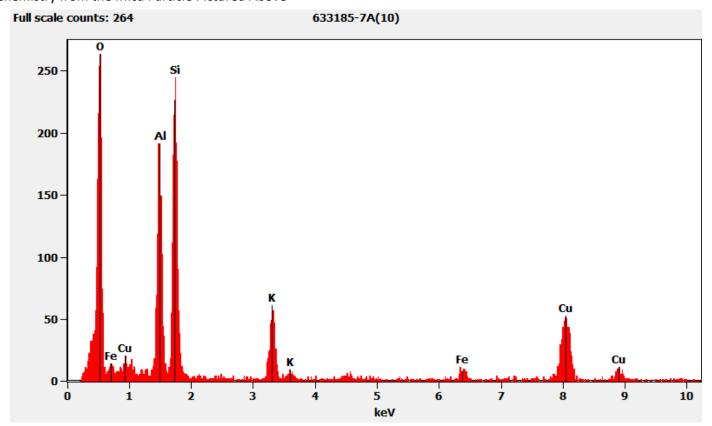


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Hexagonal Diffraction Pattern from the Mica Particle Pictured Above



Chemistry from the Mica Particle Pictured Above



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633185-8A, 8B, 8C/Client Sample: 01212022-8

PIM

All three aliquots of sample 01212022-8 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-8A	No Asbestos Detected
633185-8B	No Asbestos Detected
633185-8C	No Asbestos Detected

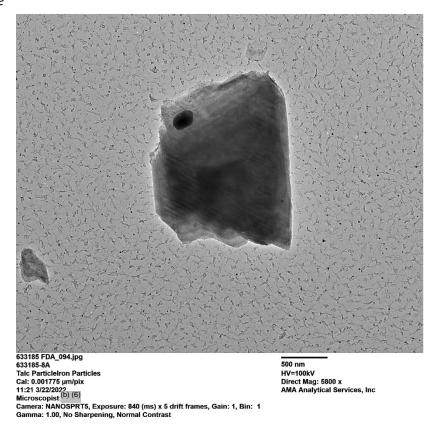
TEM

(b) (6) analyzed aliquot 8A on March 22, 2022. (b) (6) analyzed aliquot 8B on March 22, 2022, and aliquot 8C on March 23, 2022. The primary particles observed were talc and mica; titanium and iron particles were also observed along with 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.

633185-8A	No Asbestos Detected
633185-8B	No Asbestos Detected
633185-8C	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 the chemistry spectra are zinc and carbon from the TEM specimen holder.

633185-8A, Talc Particle

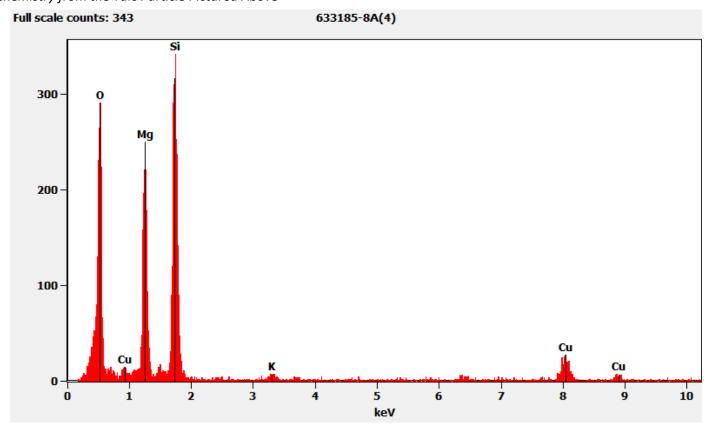


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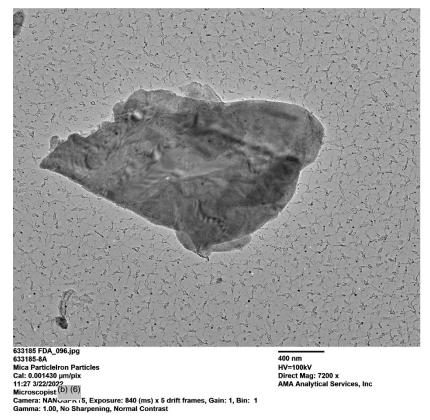
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



Chemistry from the Talc Particle Pictured Above



633185-8A, Mica Particle

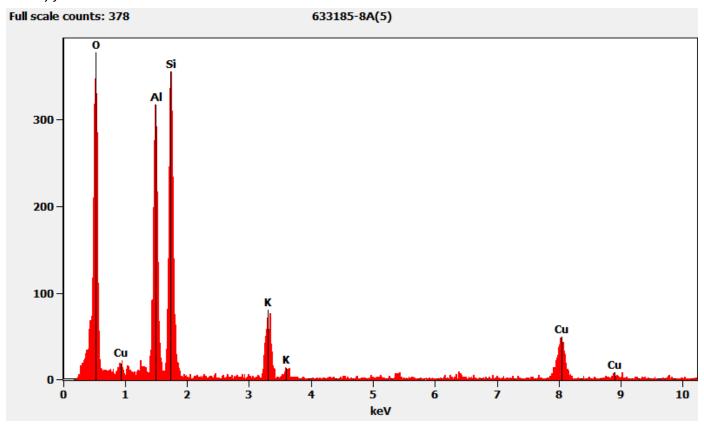


Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

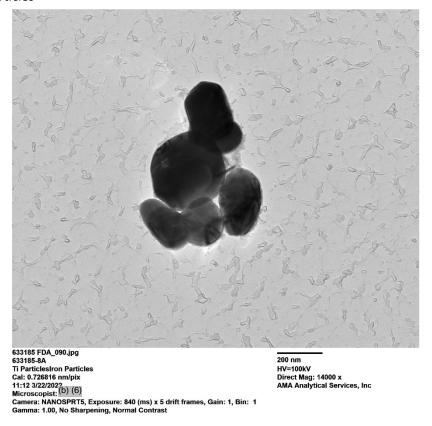


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Chemistry from the Mica Particle Pictured Above



633185-8A, Titanium Particles

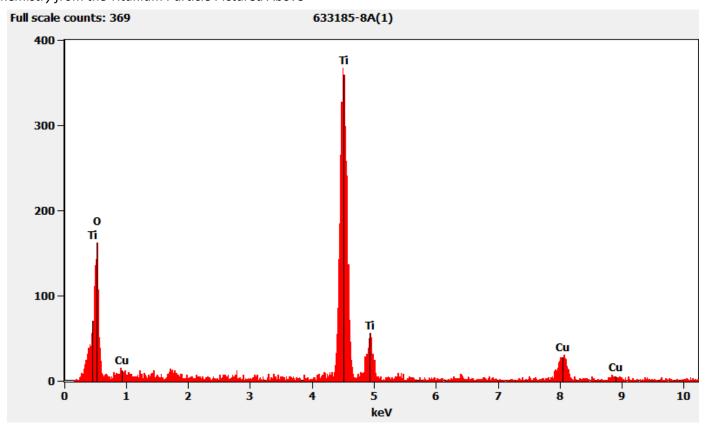


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Diffraction Pattern from the Titanium Particles Pictured Above

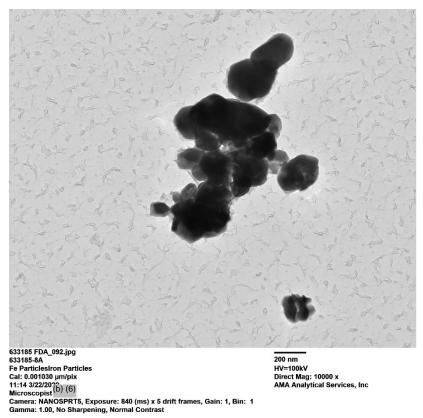


Chemistry from the Titanium Particle Pictured Above



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633185-8A, Iron Particles

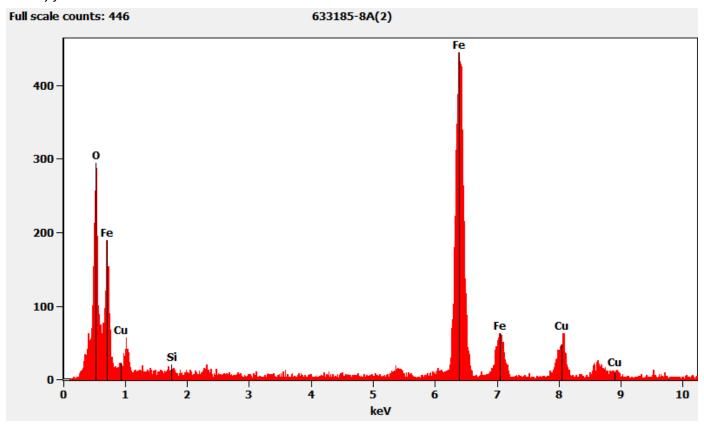


Diffraction Pattern from the Iron Particles Pictured Above

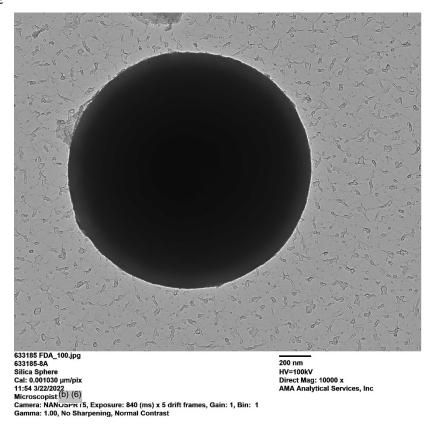


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Chemistry from the Iron Particles Pictured Above

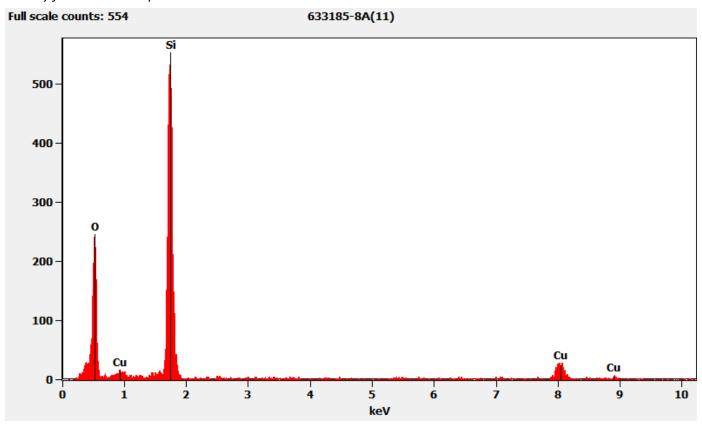


633185-8A, Silica Sphere



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Chemistry from the Silica Sphere Pictured Above



633185-9A, 9B, 9C/Client Sample: 01212022-9

PLM

All three aliquots of sample 01212022-9 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-9A	No Asbestos Detected
633185-9B	No Asbestos Detected
633185-9C	No Asbestos Detected

TEM

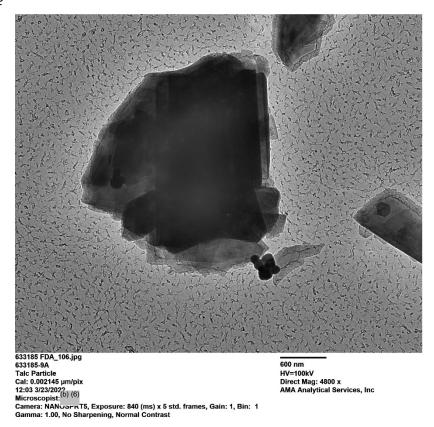
(b) (6) analyzed aliquots 9A, 9B, and 9C on March 23, 2022. The primary particle observed was talc; titanium particles were also observed along with talc fibers/ribbons, silicon particles and particles containing phosphorus and calcium. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-9A	No Asbestos Detected
633185-9B	No Asbestos Detected
633185-9C	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 the chemistry spectra are zinc and carbon from the TEM specimen holder.

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633185-9A, Talc Particle

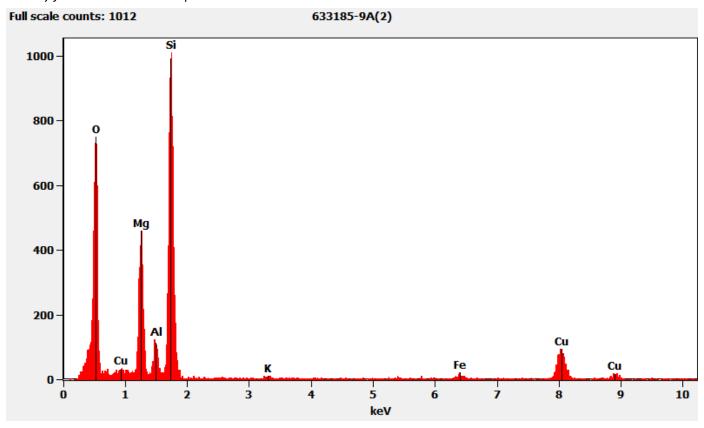


Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

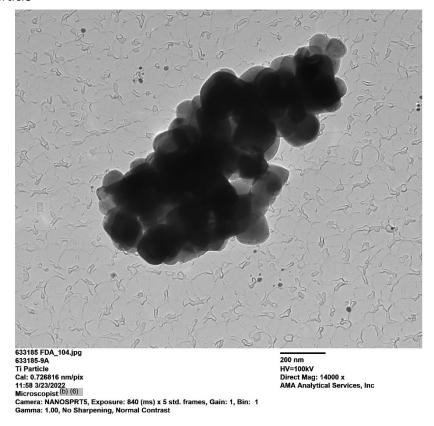


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Chemistry from the Talc Particle pictured above



633185-9A, Titanium Particle

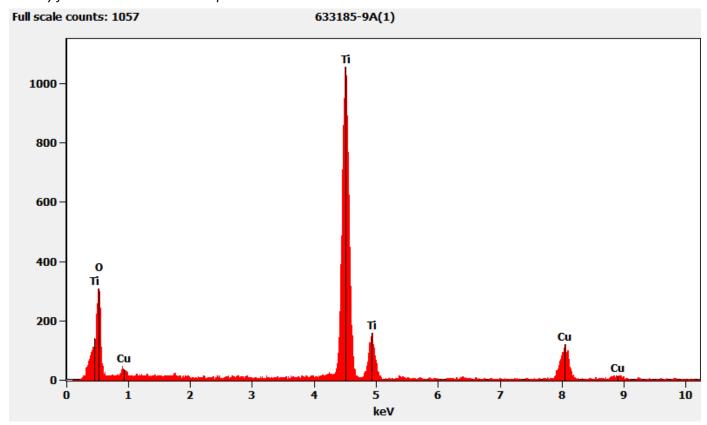


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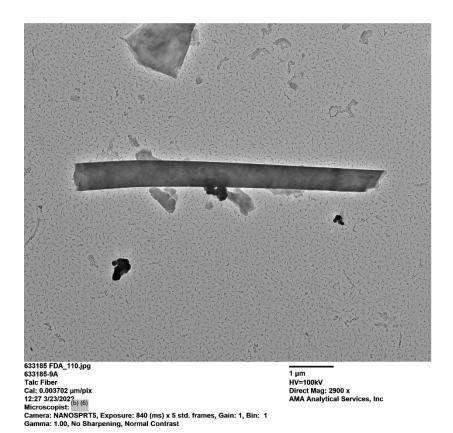
Diffraction Pattern from the Titanium Particle Pictured Above



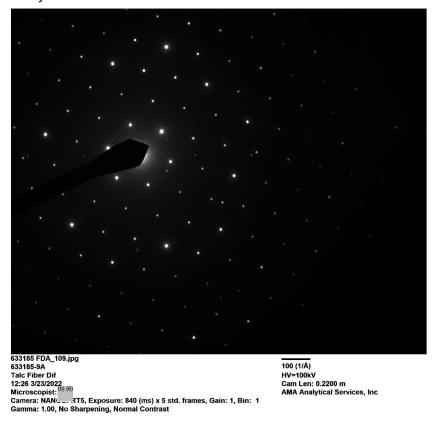
Chemistry from the Titanium Particle pictured above



633185-9A, Talc Fiber

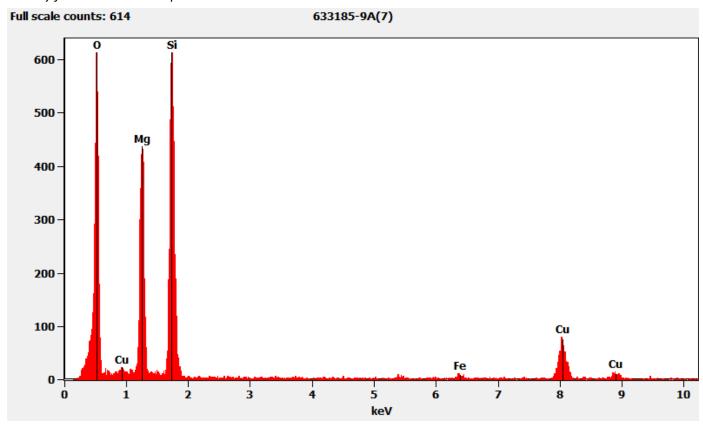


Hexagonal Diffraction Pattern from the Talc Fiber Pictured Above

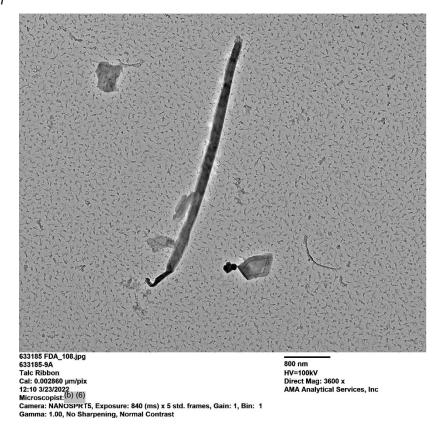


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Chemistry from the Talc Fiber pictured above



633185-9A, Talc Ribbon

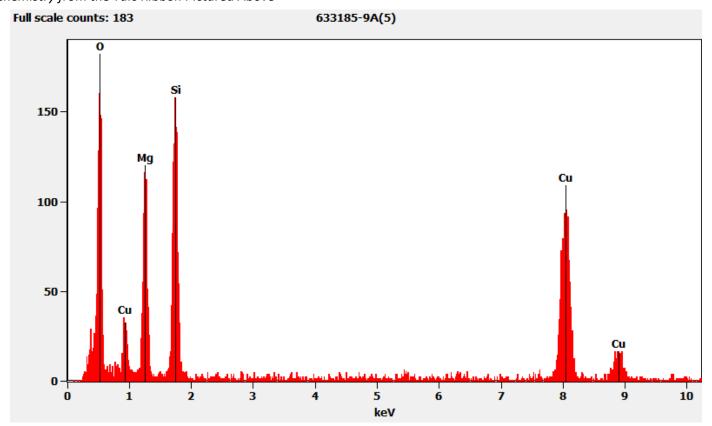


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Diffraction Pattern from the Talc Ribbon Pictured Above

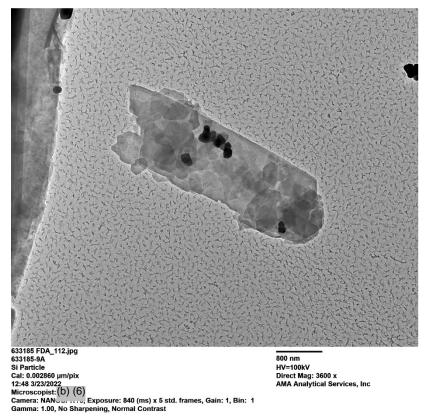


Chemistry from the Talc Ribbon Pictured Above



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633185-9A, Silicon Particle

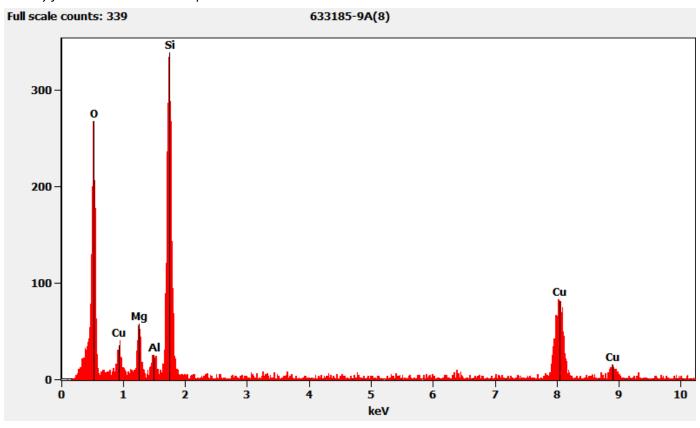


Diffraction Pattern from the Silicon Particle Pictured Above

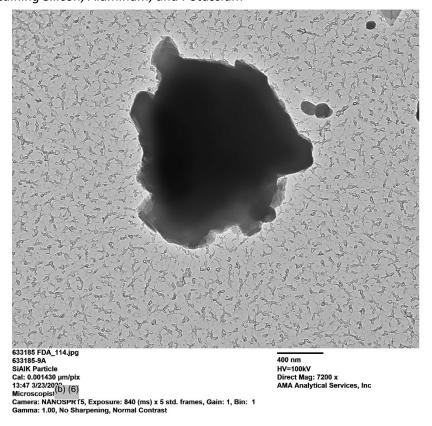


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Chemistry from the Silicon Particle pictured above

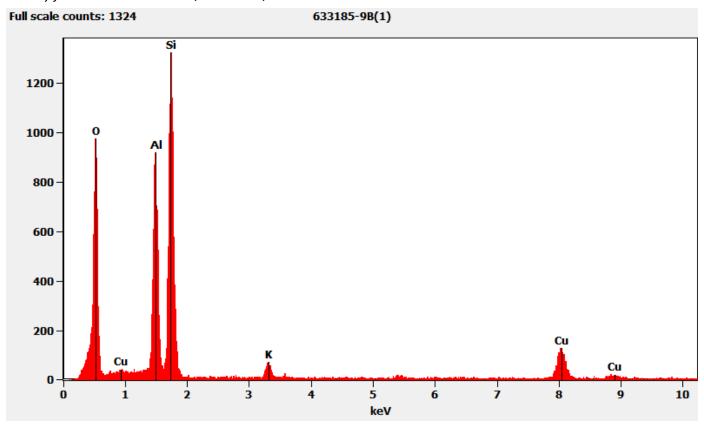


633185-9B, Particle Containing Silicon, Aluminum, and Potassium

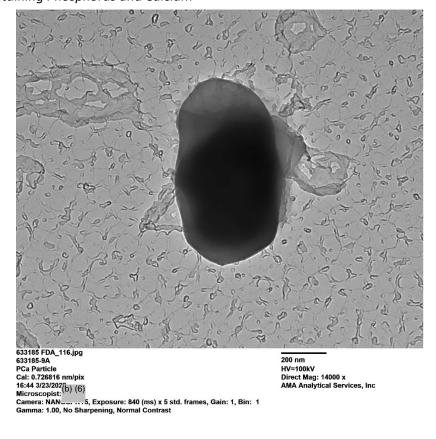


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Chemistry from the Particle Silicon, Aluminum, and Potassium Pictured Above

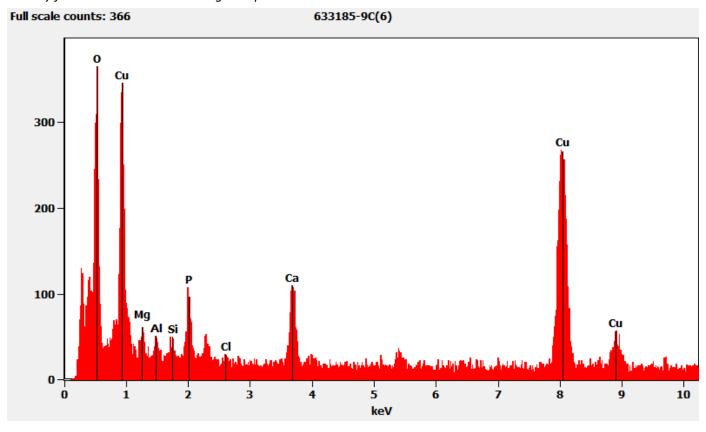


633185-9C, Particle Containing Phosphorus and Calcium



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Chemistry from the Particle Containing Phosphorus and Calcium Pictured Above



633185-10A, 10B, 10C/Client Sample: 01212022-10

PLM

All three aliquots of sample 01212022-10 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-10A	No Asbestos Detected
633185-10B	No Asbestos Detected
633185-10C	No Asbestos Detected

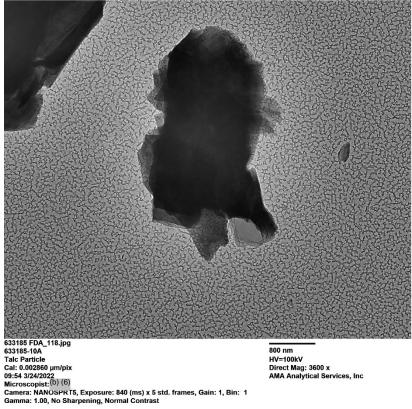
TEM

(b) (6) analyzed aliquots 10A, 10B, and 10C on March 24, 2022. The primary particle observed was talc; titanium and silicon particles were also observed along with 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.

633185-10A	No Asbestos Detected
633185-10B	No Asbestos Detected
633185-10C	No Asbestos Detected

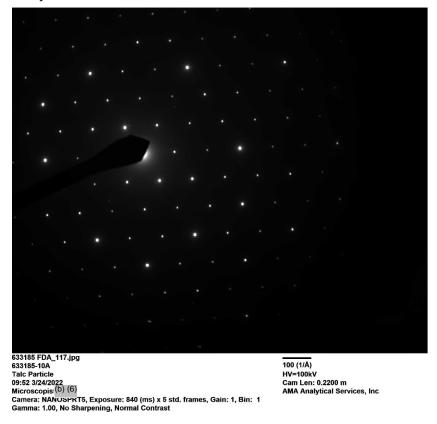
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder

633185-10A, Talc Particle

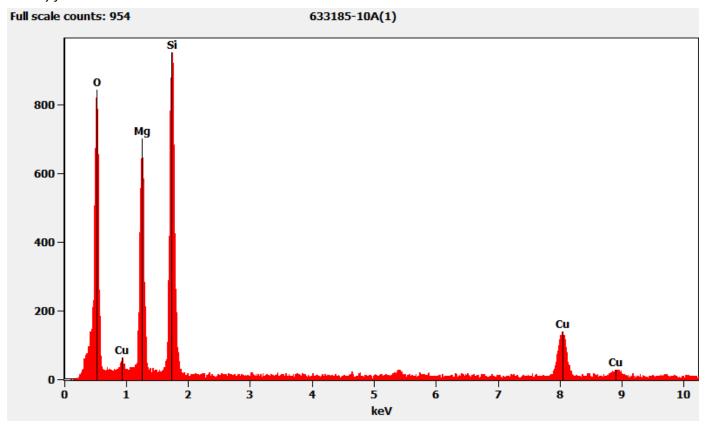


HV=100kV Direct Mag: 3600 x AMA Analytical Services, Inc

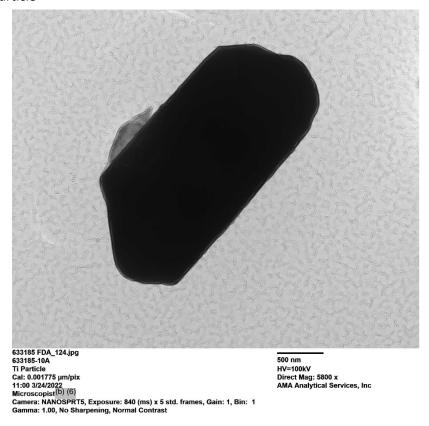
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



Chemistry from the Talc Particle Pictured Above



633185-10A, Titanium Particle

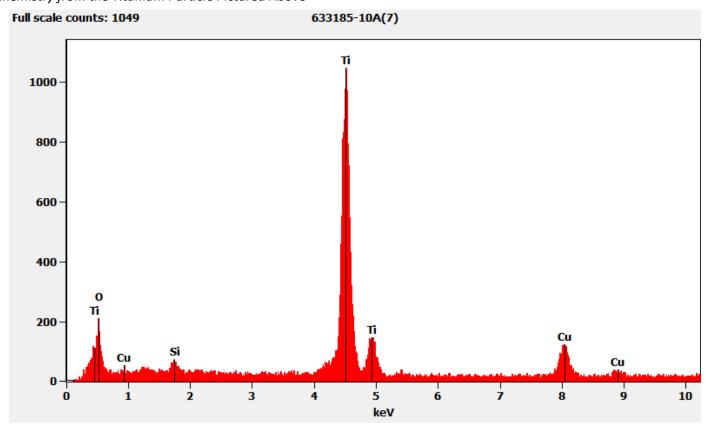


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Diffraction Pattern from the Titanium Particle Pictured Above

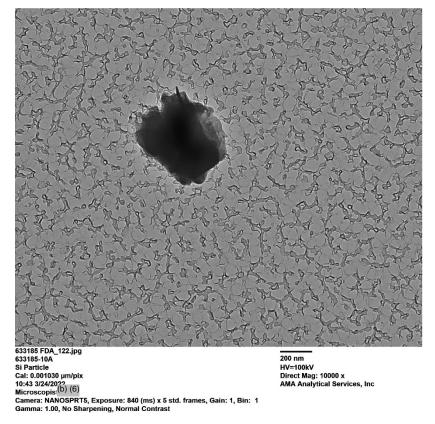


Chemistry from the Titanium Particle Pictured Above

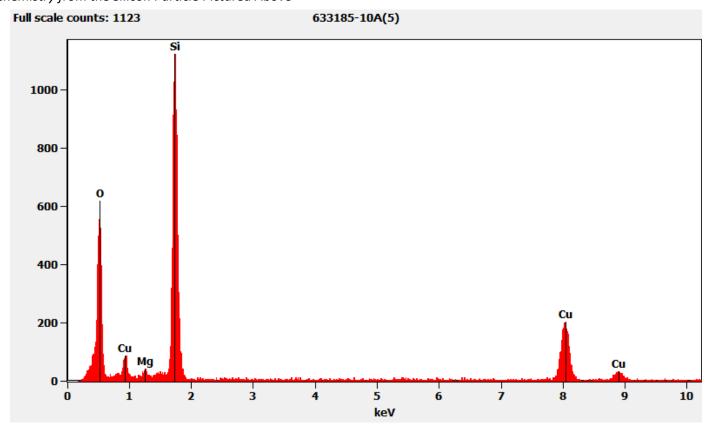


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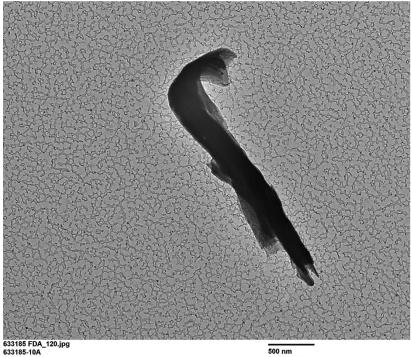
633185-10A, Silicon Particle



Chemistry from the Silicon Particle Pictured Above



633185-10A, Talc Ribbon



633185 FDA_120.jpg 633185-10A Talc Ribbon

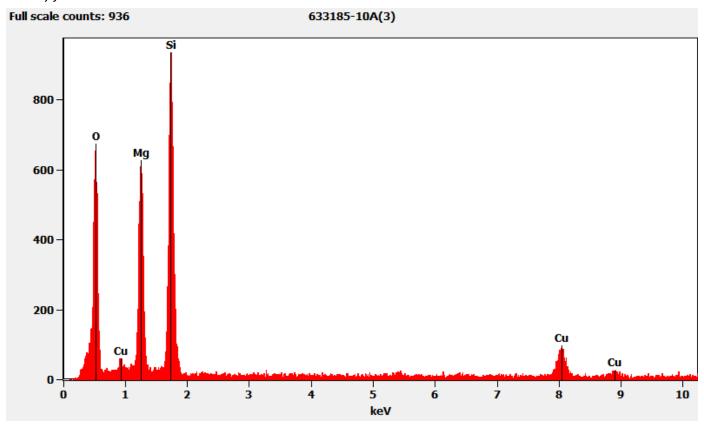
Talc KIDDON
Cal: 0.001775 µm/pix
10:20 3/24/2022
Microscopist (b) (6)
Camera: NANOSPRT5, Exposure: 840 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

HV=100kV Direct Mag: 5800 x AMA Analytical Services, Inc

Diffraction Pattern from the Talc Ribbon Pictured Above



Chemistry from the Talc Ribbon Pictured Above



633185-11A, 11B, 11C/Client Sample: 01212022-11

PLM

All three aliquots of sample 01212022-11 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-11A	No Asbestos Detected
633185-11B	No Asbestos Detected
633185-11C	No Asbestos Detected

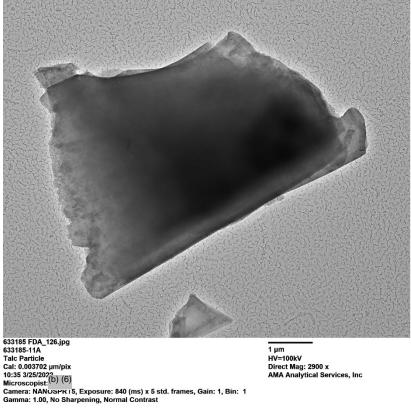
TEM

(b) (6) analyzed aliquots 11A, 11B, and 11C on March 25, 2022. The primary particle observed was talc; silicon particles were also observed along with calcium particles and 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.

633185-11A	No Asbestos Detected
633185-11B	No Asbestos Detected
633185-11C	No Asbestos Detected

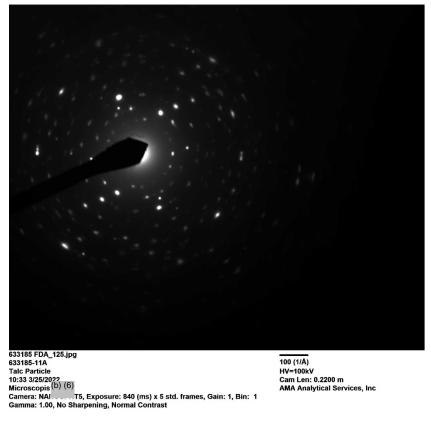
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder

633185-11A, Layered Talc Particle

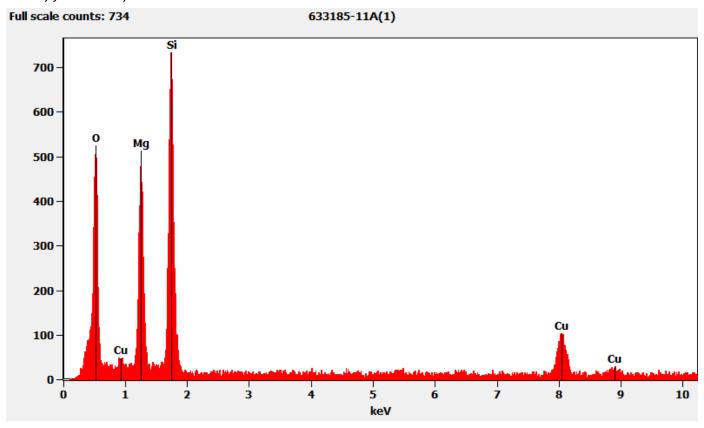


1 μm HV=100kV Direct Mag: 2900 x AMA Analytical Services, Inc

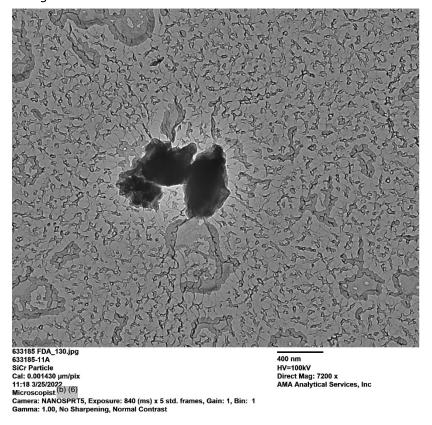
Diffraction Pattern from the Layered Talc Particle Pictured Above



Chemistry from the Layered Talc Particle Pictured Above

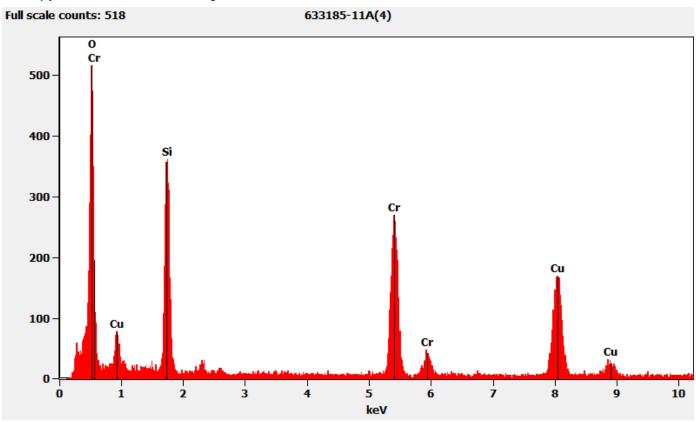


633185-11A, Particle Containing Silicon and Chromium

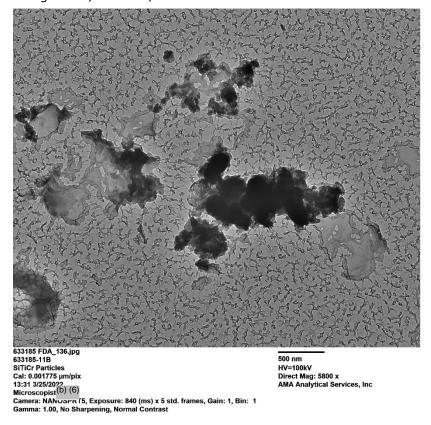


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Chemistry from the Particle Containing Silicon and Chromium Pictured Above



633185-11B, Particle Containing Silicon, Titanium, and Chromium

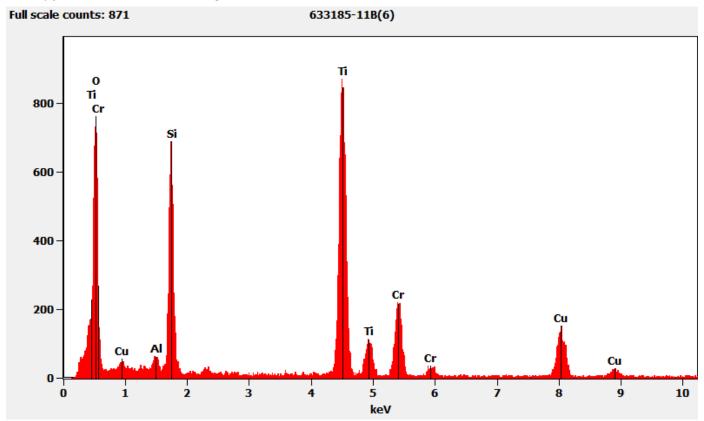


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Diffraction Pattern from the Particle Containing Silicon, Titanium, and Chromium Pictured Above

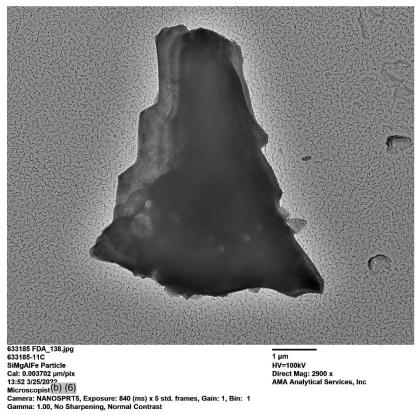


Chemistry from the Particle Containing Silicon, Titanium, and Chromium Pictured Above



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633185-11C, Particle Containing Magnesium, Aluminum, and Silicon

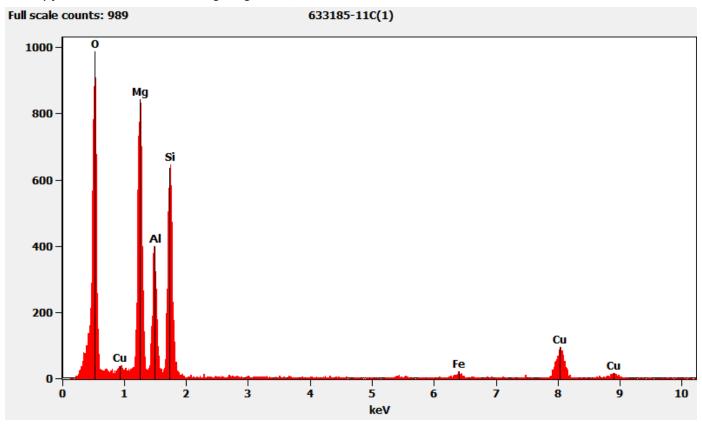


Diffraction Pattern from the Particle Containing Magnesium, Aluminum, and Silicon Pictured Above

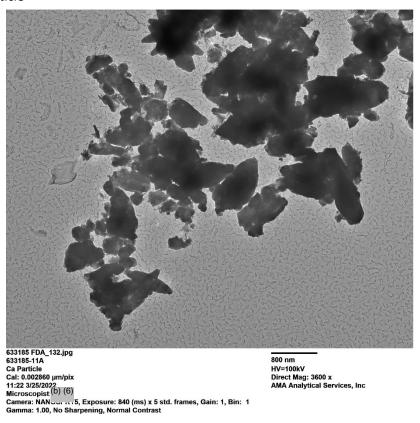


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Chemistry from the Particle Containing Magnesium, Aluminum, and Silicon Pictured Above



633185-11A, Calcium Particle

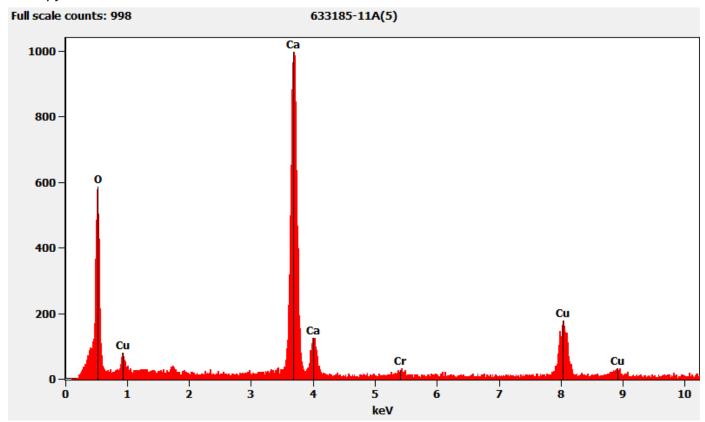


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Diffraction Pattern from the Calcium Particle Pictured Above

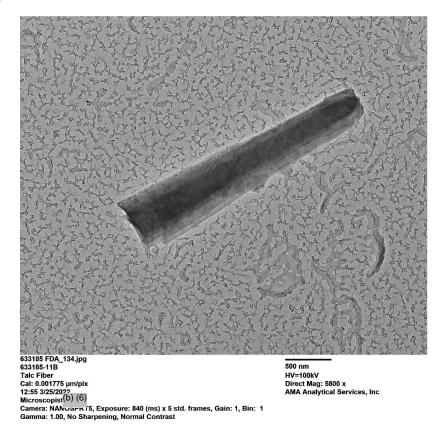


Chemistry from the Calcium Particle Pictured Above



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633185-11B, Talc Fiber

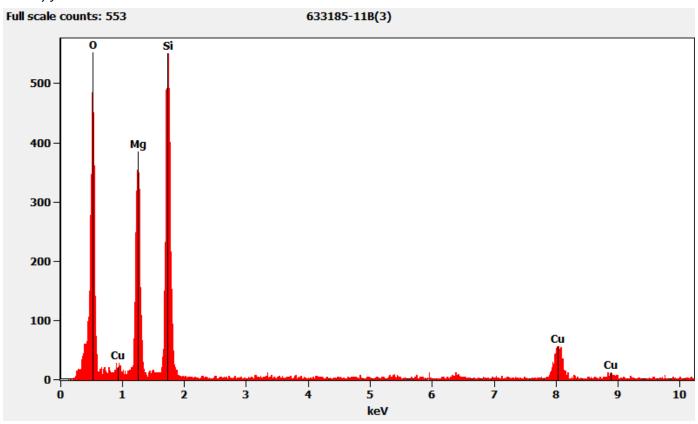


Hexagonal Diffraction Pattern from the Talc Fiber Pictured Above

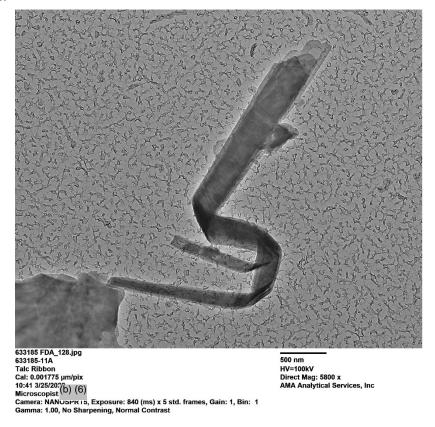


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Chemistry from the Talc Fiber Pictured Above



633185-11A, Talc Ribbon

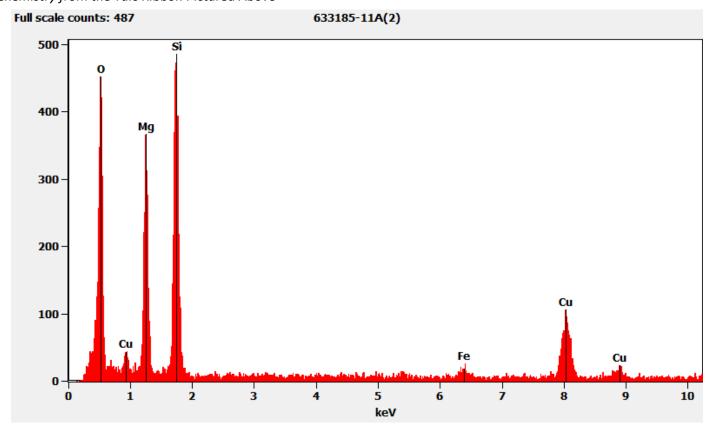


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Diffraction Pattern from the Talc Ribbon Pictured Above



Chemistry from the Talc Ribbon Pictured Above



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633185-12A, 12B, 12C/Client Sample: 01212022-12

PLM

All three aliquots of sample 01212022-12 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-12A	No Asbestos Detected
633185-12B	No Asbestos Detected
633185-12C	No Asbestos Detected

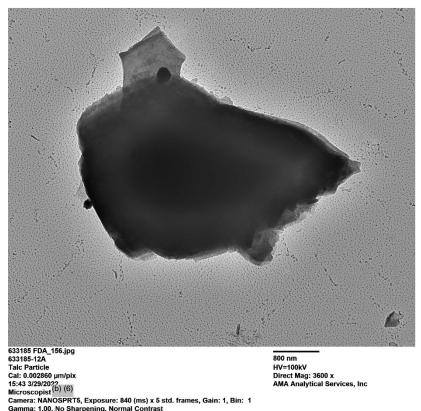
TEM

(b) (6) analyzed aliquots 12A and 12B on March 29, 2022. Andreas Saldivar analyzed aliquot 12C on March 30, 2022. The primary particles observed were talc and mica; titanium and iron particles were also observed along with silica spheres, and 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.

633185-12A	No Asbestos Detected
633185-12B	No Asbestos Detected
633185-12C	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

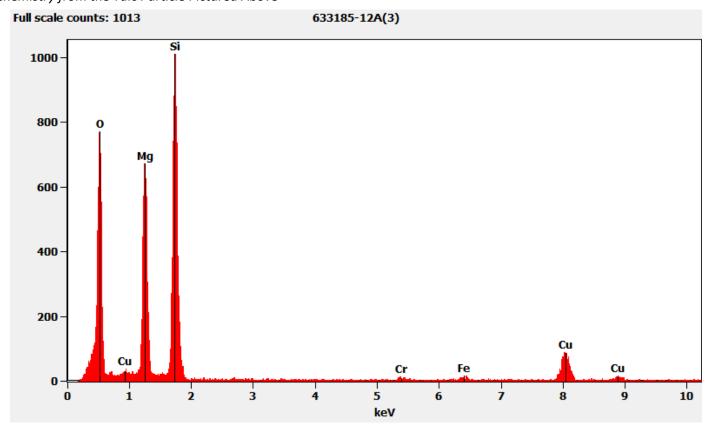
636185-12A, Talc Particle



Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

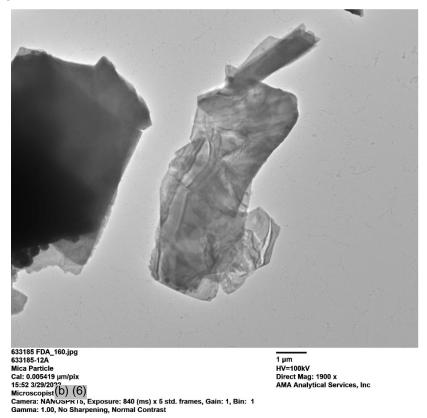


Chemistry from the Talc Particle Pictured Above



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636185-12A, Mica Particle

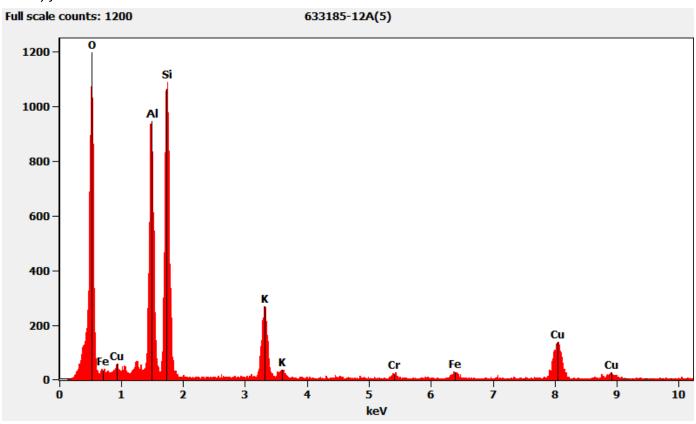


Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

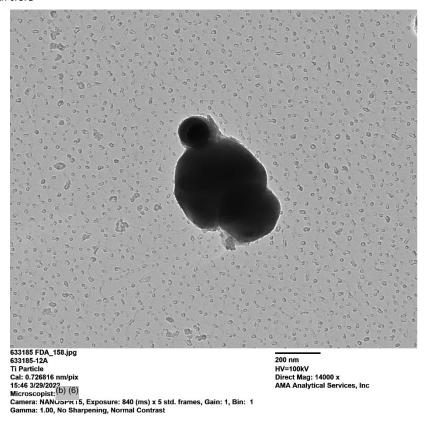


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Chemistry from the Mica Particle Pictured Above



636185-12A, Titanium Particle

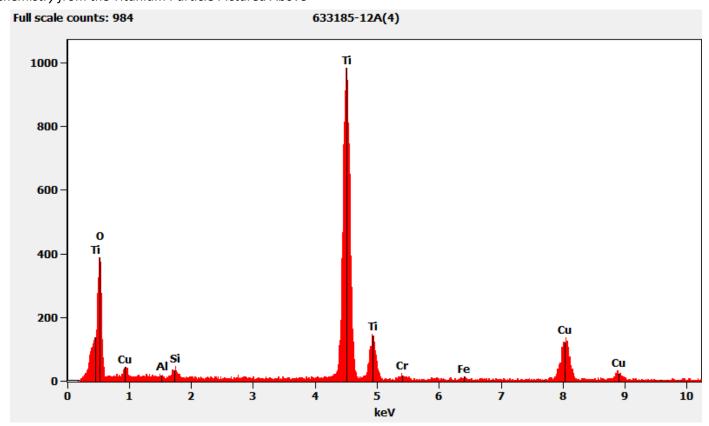


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Diffraction Pattern from the Titanium Particle Pictured Above

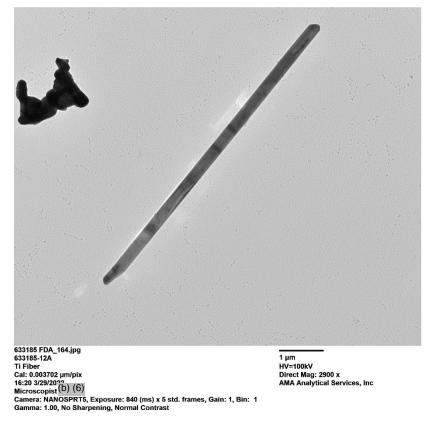


Chemistry from the Titanium Particle Pictured Above



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636185-12A, Elongated Titanium Particle

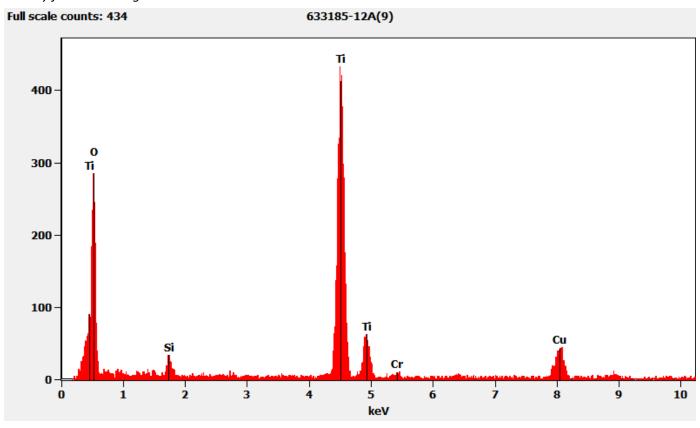


Diffraction Pattern from the Elongated Titanium Particle Pictured Above

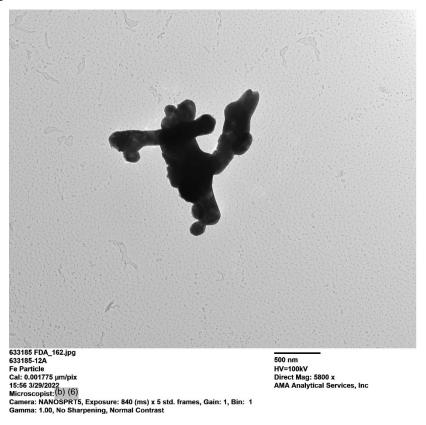


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Chemistry from the Elongated Titanium Particle Pictured Above



636185-12A, Iron Particle

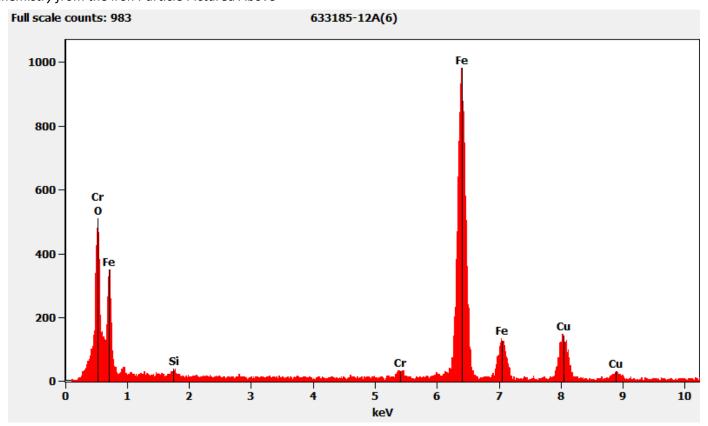


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Diffraction Pattern from the Iron Particle Pictured Above

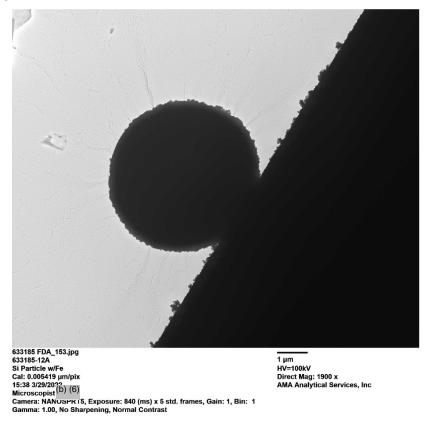


Chemistry from the Iron Particle Pictured Above

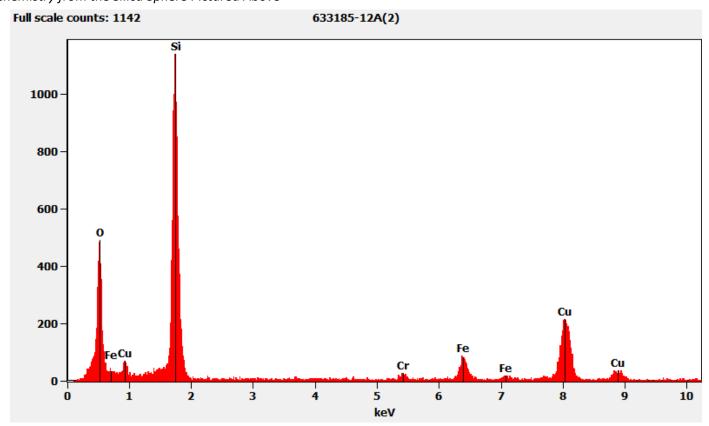


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636185-12A, Silica Sphere

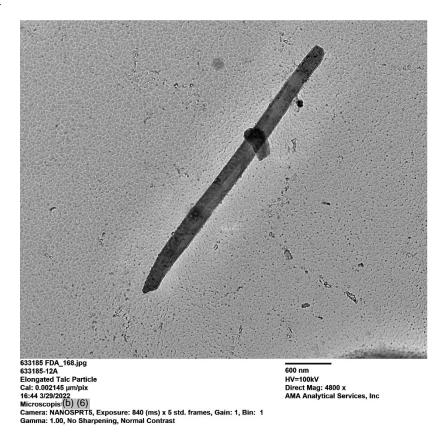


Chemistry from the Silica Sphere Pictured Above

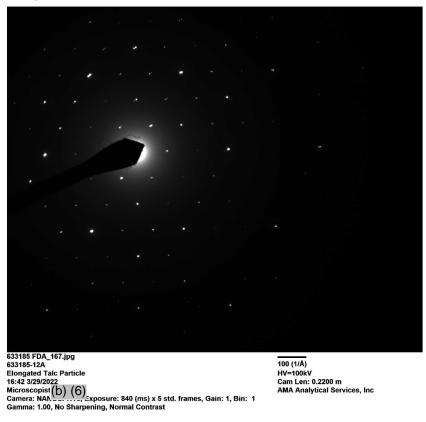


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636185-12A, Talc Fiber

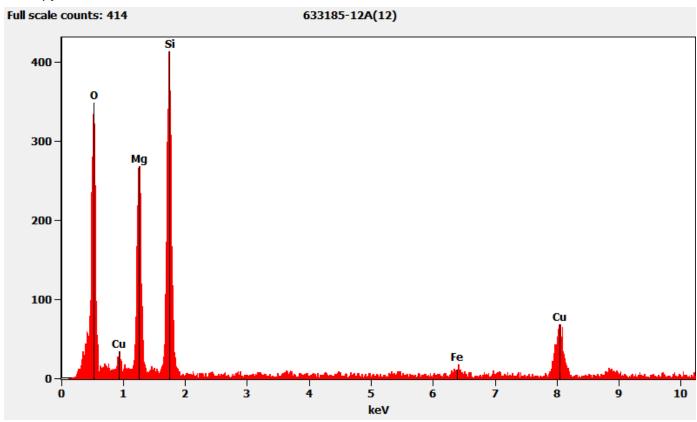


Hexagonal Diffraction Pattern from the Talc Fiber Pictured Above

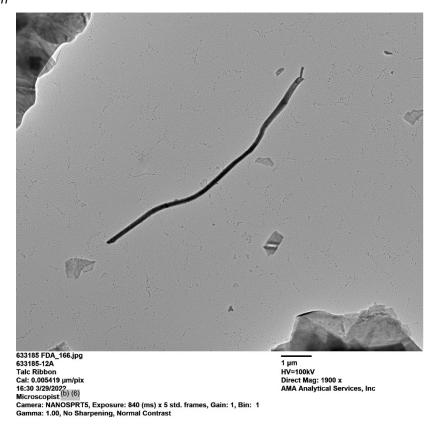


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Chemistry from the Talc Fiber Pictured Above



636185-12A, Talc Ribbon

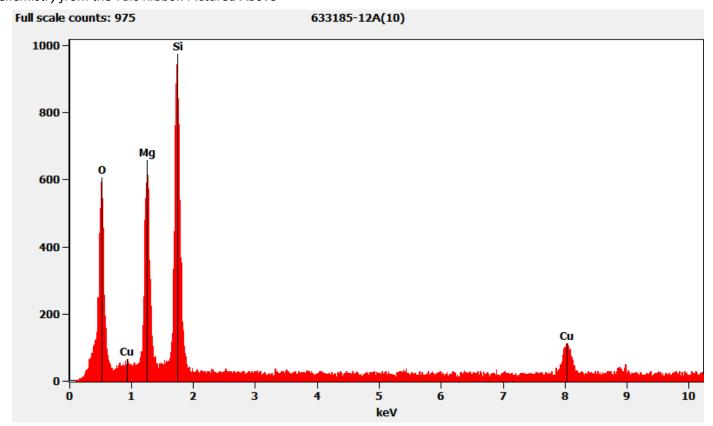


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Diffraction Pattern from the Talc Ribbon Pictured Above



Chemistry from the Talc Ribbon Pictured Above



Asbestos · Lead · Mold · Nano

633185-13A, 13B, 13C/Client Sample: 01212022-13

PIM

All three aliquots of sample 01212022-13 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-13A	No Asbestos Detected
633185-13B	No Asbestos Detected
633185-13C	No Asbestos Detected

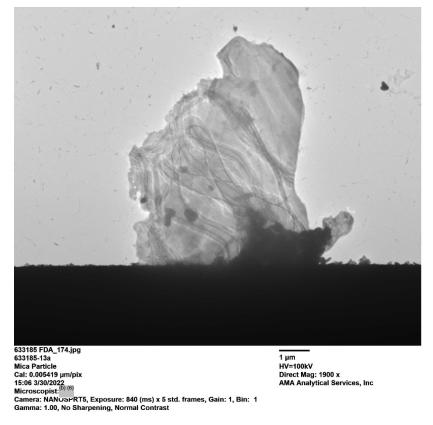
TEM

(b) (6) analyzed aliquots 13A, 13B, and 13C on March 30, 2022. The primary particles observed were mica and titanium; iron particles were also observed along with silica spheres, and talc 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.

633185-13A	No Asbestos Detected
633185-13B	No Asbestos Detected
633185-13C	No Asbestos Detected

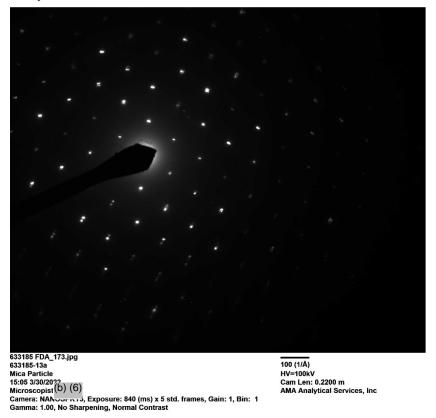
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder.

633185-13A, Mica Particle

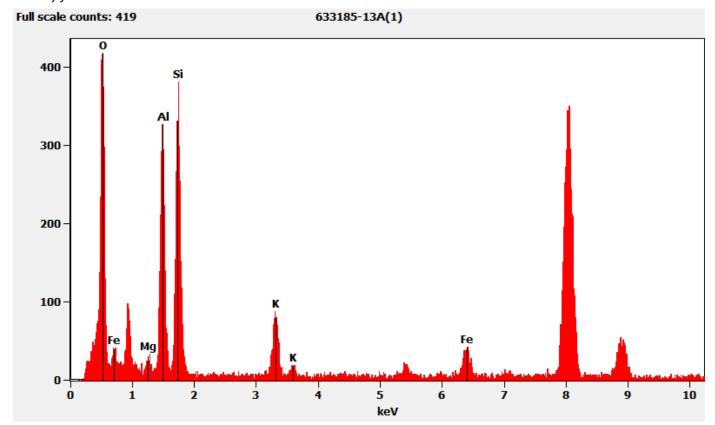


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Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

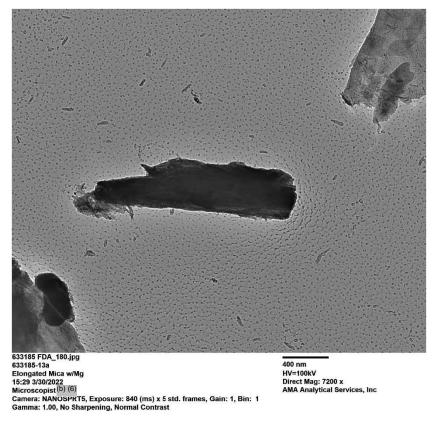


Chemistry from the Mica Particle Pictured Above

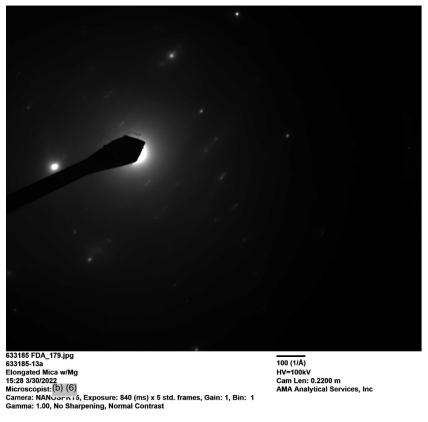


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633185-13A, Elongated Mica Particle

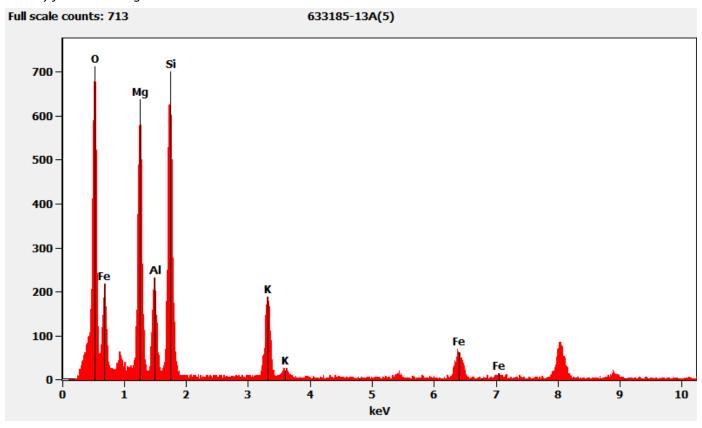


Diffraction Pattern from the Elongated Mica Particle Pictured Above

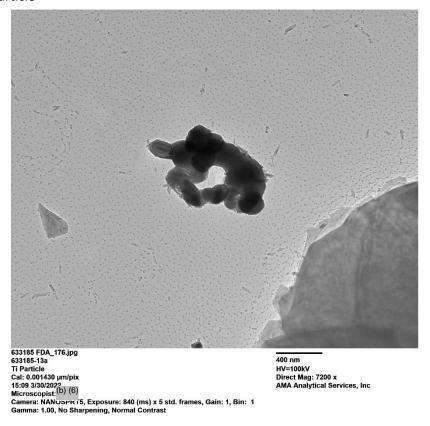


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Chemistry from the Elongated Mica Particle Pictured Above



633185-13A, Titanium Particle

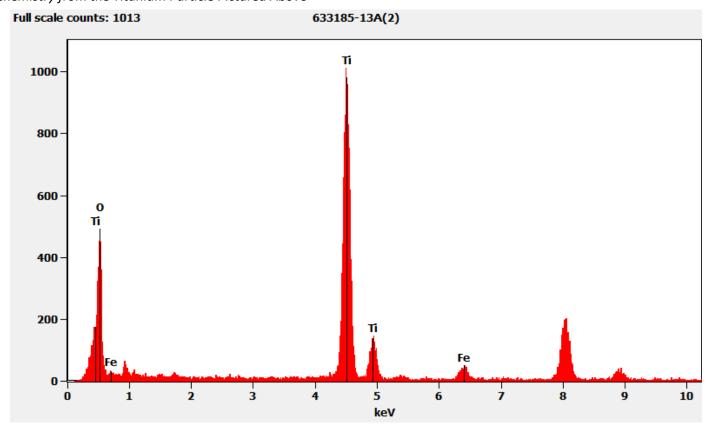


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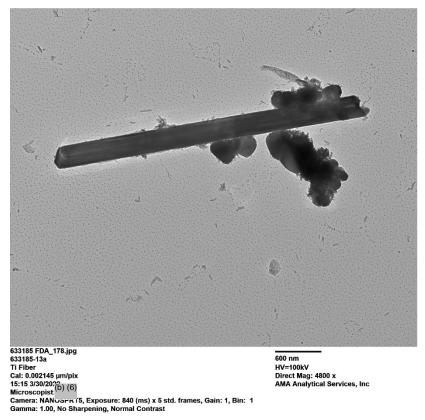
Diffraction Pattern from the Titanium Particle Pictured Above



Chemistry from the Titanium Particle Pictured Above



633185-13A, Elongated Titanium Particle

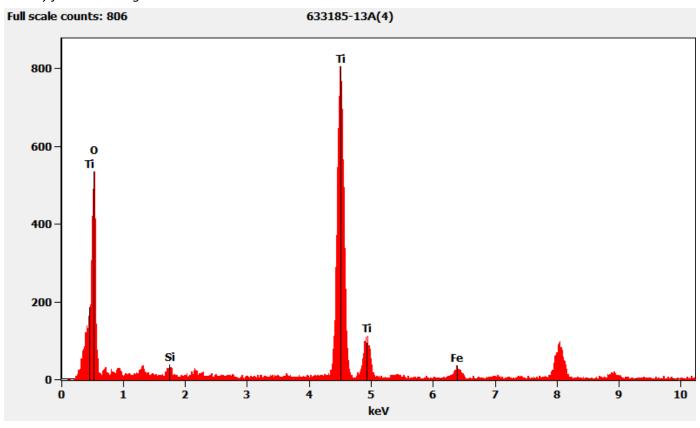


Diffraction Pattern from the Elongated Titanium Particle Pictured Above

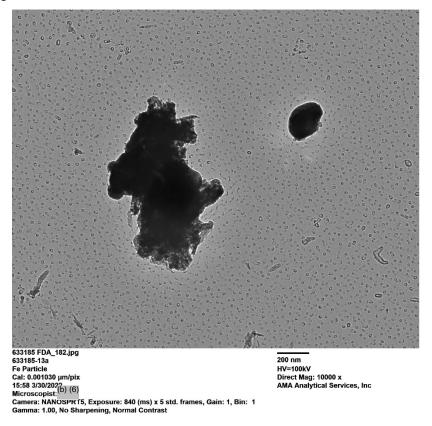


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Chemistry from the Elongated Titanium Particle Pictured Above



633185-13A, Iron Particle

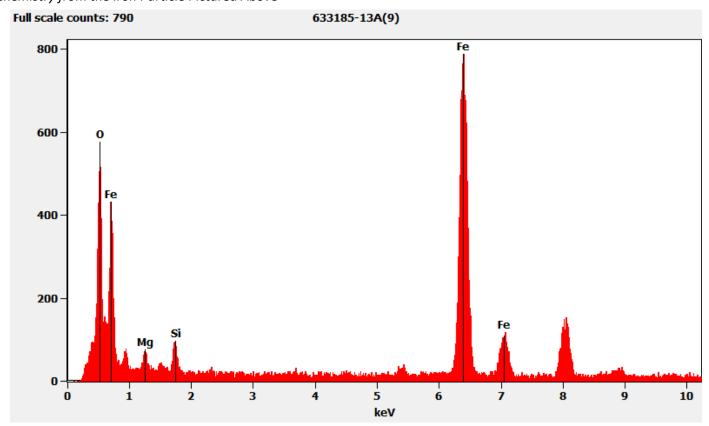


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Diffraction Pattern from the Iron Particle Pictured Above

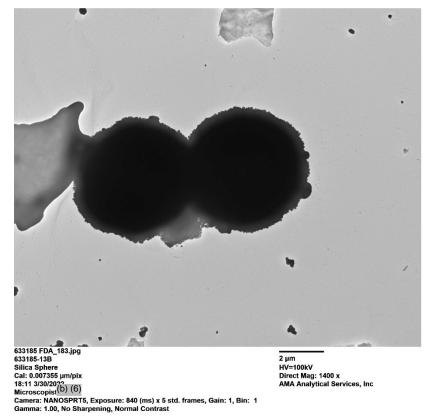


Chemistry from the Iron Particle Pictured Above

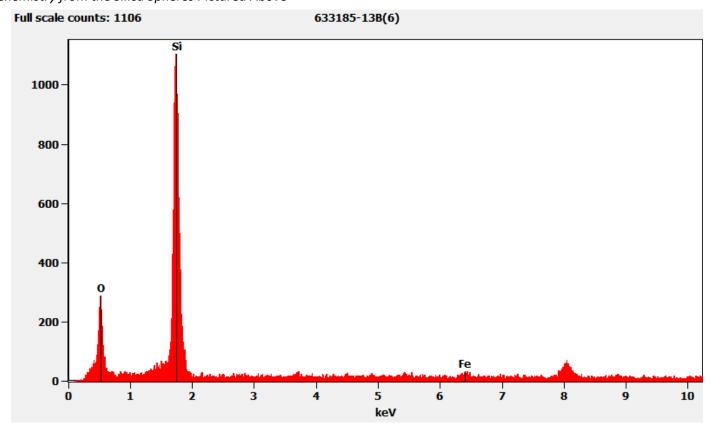


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633185-13B, Silica Spheres

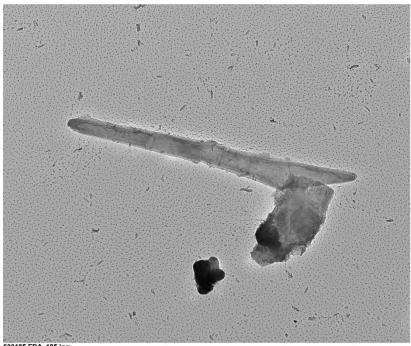


Chemistry from the Silica Spheres Pictured Above



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633185-13B, Talc Fiber



633185 FDA_185,jpg
633185-13B
Elongated Talc Particle
Cal: 0.002145 µm/pix
10:02 3/31/2022
Microscopis(b) (6)
Camera: NANUSPK 15, Exposure: 840 (ms) x 5 std. frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

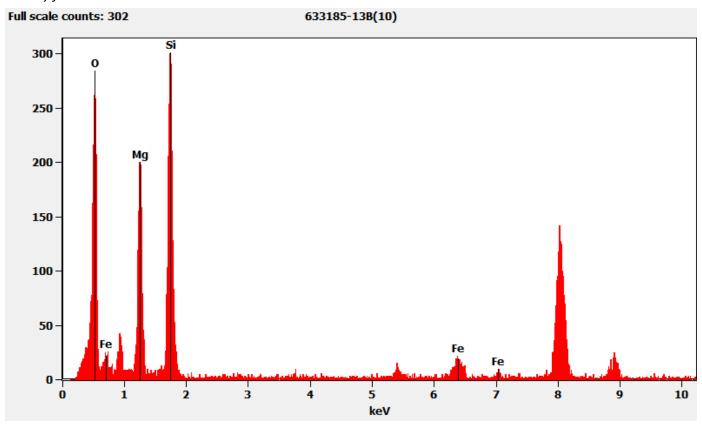
HV=100kV Direct Mag: 4800 x AMA Analytical Services, Inc

Hexagonal Diffraction Pattern from the Talc Fiber Pictured Above



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Chemistry from the Talc Fiber Pictured Above



633185-14A, 14B, 14C/Client Sample: 01212022-14

PLM

All three aliquots of sample 01212022-14 were analyzed by (b) (6) on March 31, 2022. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-14A	No Asbestos Detected
633185-14B	No Asbestos Detected
633185-14C	No Asbestos Detected

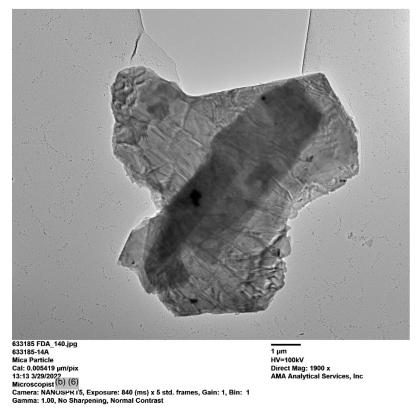
TEM

(b) (6) analyzed aliquot 14A on March 29, 2022, and aliquot 14C on March 31, 2022. (b) (6) analyzed aliquot 14B on March 30, 2022. The primary particle observed was mica; talc particles were also observed along with iron particles, silica spheres, and particles containing titanium, silicon, and iron. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

633185-14A	No Asbestos Detected
633185-14B	No Asbestos Detected
633185-14C	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.

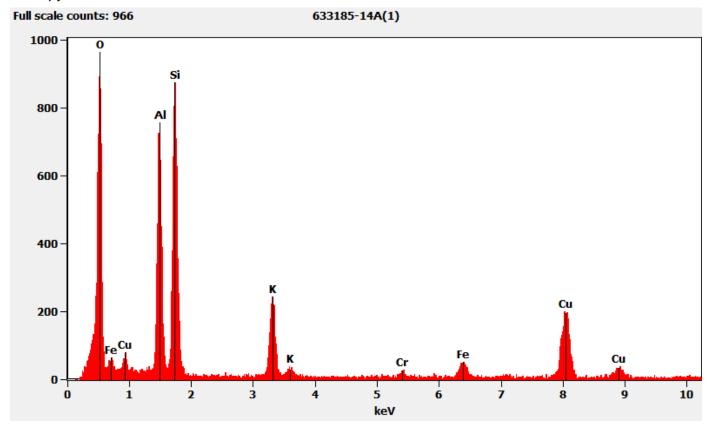
633185-14A, Mica Particle



Hexagonal Diffraction Pattern from the Mica Particle Pictured Above

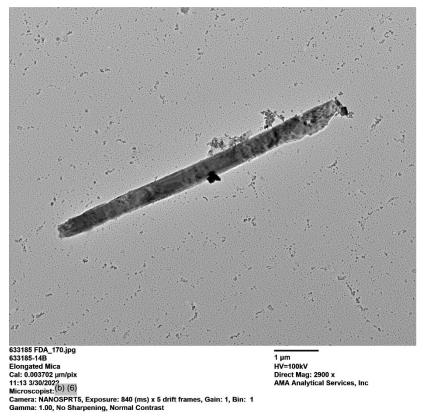


Chemistry from the Mica Particle Pictured Above

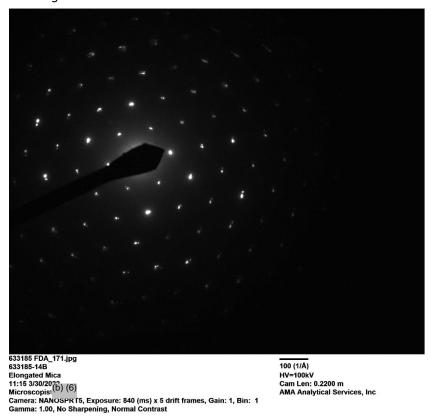


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633185-14B, Elongated Mica Particle

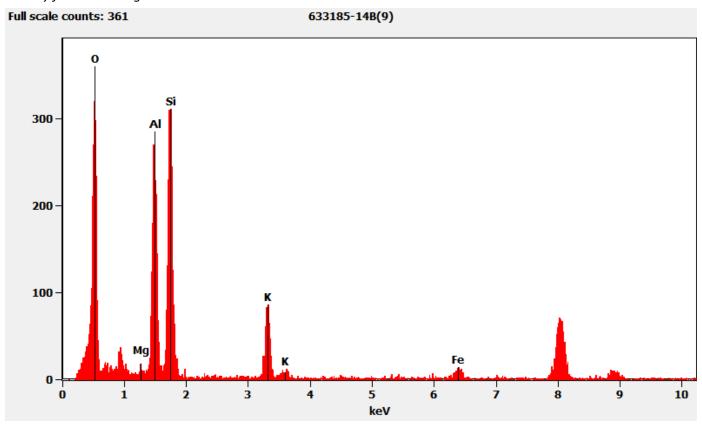


Diffraction Pattern from the Elongated Mica Particle Pictured Above

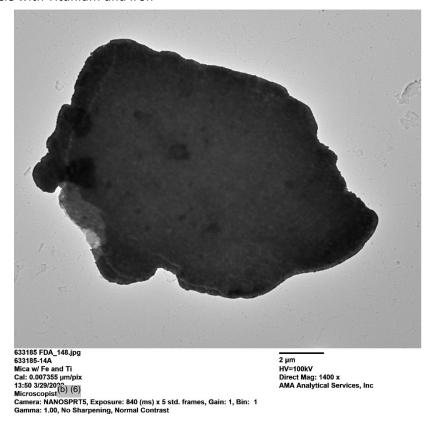


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Chemistry from the Elongated Mica Particle Pictured Above



633185-14A, Mica Particle with Titanium and Iron

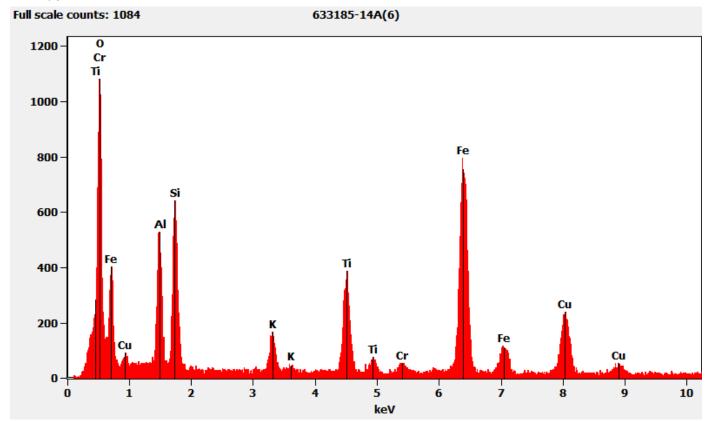


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Diffraction Pattern from the Mica Particle with Titanium and Iron Pictured Above

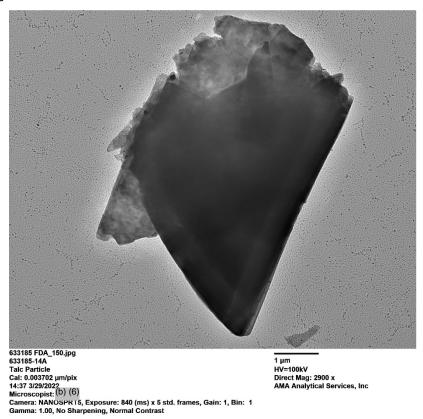


Chemistry from the Mica Particle with Titanium and Iron Pictured Above

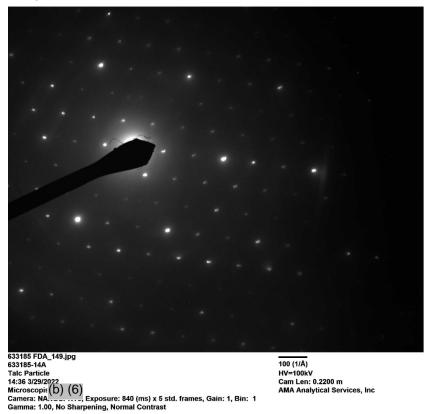


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633185-14A, Talc Particle

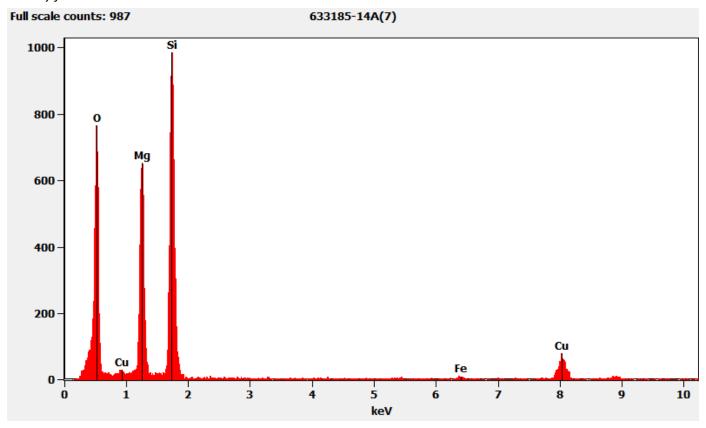


Hexagonal Diffraction Pattern from the Talc Particle Pictured Above

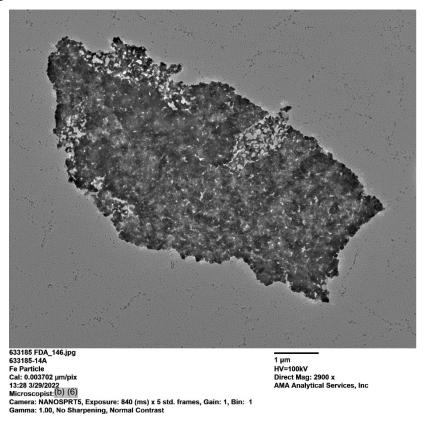


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Chemistry from the Talc Particle Pictured Above



633185-14A, Iron Particle

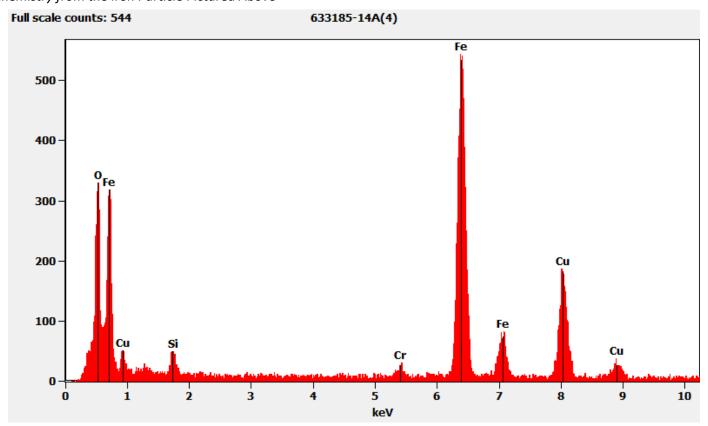


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Diffraction Pattern from the Iron Particle Pictured Above

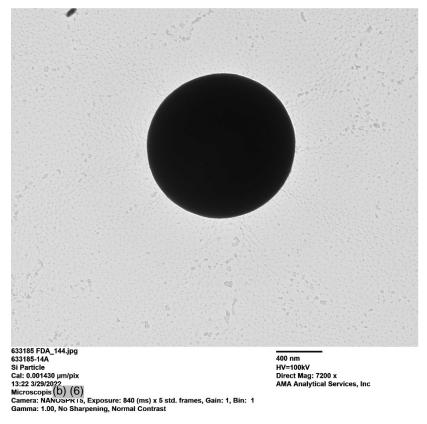


Chemistry from the Iron Particle Pictured Above

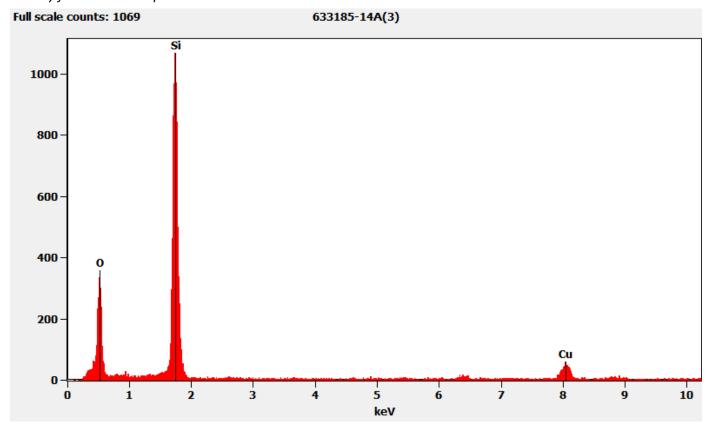


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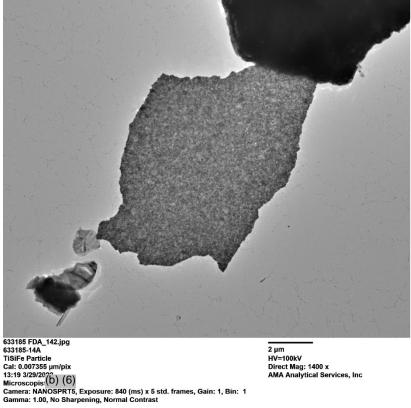
633185-14A, Silica Sphere



Chemistry from the Silica Sphere Pictured Above

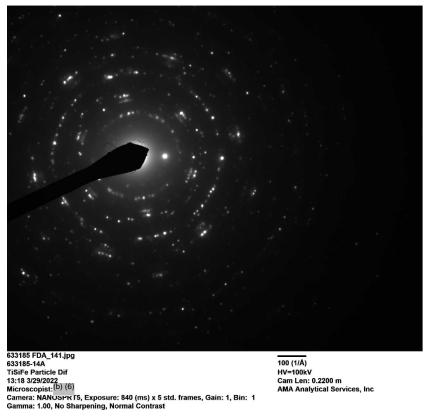


633185-14A, Particle Containing Titanium, Silicon, and Iron



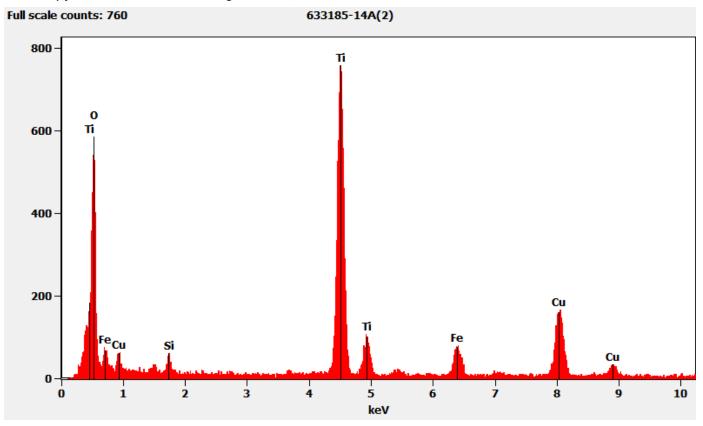
2 μm HV=100kV Direct Mag: 1400 x AMA Analytical Services, Inc

Diffraction Pattern from the Particle Containing Titanium, Silicon, and Iron Pictured Above



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Chemistry from the Particle Containing Titanium, Silicon, and Iron 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. The matrix blank samples associated with the PLM preparations, numbers NB22-170, NB22-176, NB22-196, and NB22-210 were not analyzed since no asbestos was observed on the associated client samples. Although it was not required, (b) (6) analyzed the matrix blank samples associated with the TEM preparations, numbers NB22-169, NB22-175, NB22-194, and NB22-209 on March 31, 2022; no asbestos was observed on the matrix blank samples.

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-14 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 58075, 58090, 58130 and 58170 were analyzed.

(b) (6) analyzed samples 58075, 58130, and 58170 on March 31, 2022. (b) (6) analyzed sample 58090 on May 20, 2022. No asbestos was detected on the TEM grid preparation blank samples.

Our laboratory information management system (LIMS) randomly selected sample 633185-1A/01212022-1 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 March 31, 2022, for PLM and by (b) (6) on March 31, 2022, for TEM. The QC results were consistent with the original findings.

Our laboratory information management system (LIMS) randomly selected samples 633185-2A/04272021-2 and 633185-10A/01212022-10 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 March 31, 2022, for PLM and by (b) (6) on April 26, 2022, for TEM. The QC results were consistent with the original findings.

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

6/30/2022

President

