









# **Analytical Report for:**

Testing of Official Samples of Talc Containing Cosmetics for Asbestiform Fibers

**Contract Number: 75F40119P10689** 

Assignment DFPG# 22-08, Batch No. 03302022 (Batch #3) AMA COC No. 635810

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

Chain of Custody: 635810

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 3 (No. 03302022)

Job Number: CLIN 1001 PO Number: 75F40119P10689

Date Submitted: 4/25/2022 Date Analyzed: 5/12/2022 - 6/2/2022 Report Date: 9/16/2022 Date Sampled: Not Provided Person Submitting: Martha Schwartz

Revised:

#### **SUMMARY OF ANALYSIS**

AMA Comple ID	Clique Compula ID	TEM LOD	TEM LOQ	% Chrysotile by TEM	% Tremolite by TEM	% Total Chrysotile & Tremolite by TEM	% ^ ab act as	%	% Acid	%	Commonte
AIVIA Sample ID	Client Sample ID	Using ASTM D5756 Mass Calculation	Asbestos by PLM	Organics	Soluable	Other	Comments				
635810-1A	03302022-1	0.00000339%	0.00001358%	ND	ND	< 0.00001%	ND	6.66%	11.99%	81.35%	
635810-1B	03302022-1	0.00000336%	0.00001344%	ND	ND	< 0.00001%	ND	6.49%	13.28%	80.23%	
635810-1C	03302022-1	0.00000342%	0.00001367%	ND	ND	< 0.00001%	ND	6.80%	10.14%	83.05%	
635810-2A	03302022-2	0.00000427%	0.00001709%	ND	ND	< 0.00002%	ND	15.42%	17.36%	67.22%	
635810-2B	03302022-2	0.00000347%	0.00001389%	ND	ND	< 0.00001%	ND	15.57%	19.15%	65.28%	
635810-2C	03302022-2	0.00000257%	0.00001030%	ND	ND	< 0.00001%	ND	15.57%	15.60%	68.84%	
635810-3A	03302022-3	0.00000306%	0.00001224%	ND	ND	< 0.00001%	ND	7.05%	12.44%	80.52%	
635810-3B	03302022-3	0.00000351%	0.00001405%	ND	ND	< 0.00001%	ND	6.93%	12.01%	81.06%	
635810-3C	03302022-3	0.00000391%	0.00001565%	ND	ND	< 0.00002%	ND	6.83%	13.26%	79.91%	
635810-4A	03302022-4	0.00000313%	0.00001253%	ND	ND	< 0.00001%	ND	8.72%	11.51%	79.77%	
635810-4B	03302022-4	0.00000286%	0.00001145%	ND	ND	< 0.00001%	ND	8.74%	11.35%	79.91%	
635810-4C	03302022-4	0.00000278%	0.00001111%	ND	ND	< 0.00001%	ND	8.72%	10.18%	81.10%	
635810-5A	03302022-5	0.00000328%	0.00001312%	ND	ND	< 0.00001%	ND	7.69%	8.03%	84.28%	
635810-5B	03302022-5	0.00000265%	0.00001062%	ND	ND	< 0.00001%	ND	7.68%	8.21%	84.12%	
635810-5C	03302022-5	0.00000261%	0.00001043%	ND	ND	< 0.00001%	ND	7.75%	8.61%	83.64%	
635810-6A	03302022-6	0.00000271%	0.00001083%	ND	ND	< 0.00001%	ND	14.79%	9.86%	75.35%	
635810-6B	03302022-6	0.00000338%	0.00001352%	ND	ND	< 0.00001%	ND	14.70%	9.42%	75.88%	
635810-6C	03302022-6	0.00000282%	0.00001128%	ND	ND	< 0.00001%	ND	14.87%	9.47%	75.66%	
635810-7A	03302022-7	0.00000274%	0.00001096%	ND	ND	< 0.00001%	ND	6.56%	7.62%	85.82%	
635810-7B	03302022-7	0.00000331%	0.00001324%	ND	ND	< 0.00001%	ND	6.64%	7.94%	85.42%	
635810-7C	03302022-7	0.00000309%	0.00001236%	ND	ND	< 0.00001%	ND	6.55%	6.76%	86.69%	
635810-8A	03302022-8	0.00000323%	0.00001293%	ND	ND	< 0.00001%	ND	5.73%	7.17%	87.10%	
635810-8B	03302022-8	0.00000291%	0.00001165%	ND	ND	< 0.00001%	ND	5.76%	7.29%	86.95%	
635810-8C	03302022-8	0.00000372%	0.00001490%	ND	ND	< 0.00001%	ND	5.74%	9.91%	84.35%	
635810-9A	03302022-9	0.00000311%	0.00001243%	ND	ND	< 0.00001%	ND	20.50%	45.28%	34.22%	
635810-9B	03302022-9	0.00000303%	0.00001211%	ND	ND	< 0.00001%	ND	20.20%	45.99%	33.81%	
635810-9C	03302022-9	0.00000327%	0.00001310%	ND	ND	< 0.00001%	ND	20.29%	45.08%	34.63%	
635810-10A	03302022-10	0.00000470%	0.00001881%	ND	ND	< 0.00002%	ND	12.28%	11.30%	76.42%	
635810-10B	03302022-10	0.00000322%	0.00001289%	ND	ND	< 0.00001%	ND	12.37%	10.05%	77.58%	
635810-10C	03302022-10	0.00000322%	0.00001232%	ND	ND	< 0.00001%	ND	12.53%	9.01%	78.46%	
635810-11A	03302022-11	0.00000300%	0.00001292%	ND	ND	< 0.00001%	ND	17.18%	17.74%	65.07%	
635810-11B	03302022-11	0.00000398%	0.00001593%	ND	ND	< 0.00002%	ND	17.01%	19.27%	63.72%	
635810-11C	03302022-11	0.00000433%	0.00001333%	ND	ND	< 0.00002%	ND	17.06%	17.66%	65.29%	
635810-12A	03302022-12	0.00000153%	0.00000614%	ND	ND	< 0.00001%	ND	54.62%	5.30%	40.08%	results reported on a dry weight basis
635810-12B	03302022-12	0.00000108%	0.00000433%	ND	ND	< 0.00001%	ND	46.04%	4.52%	49.44%	results reported on a dry weight basis
635810-12C	03302022-12	0.00000121%	0.00000484%	ND	ND	< 0.00001%	ND	47.15%	6.45%	46.40%	results reported on a dry weight basis
635810-13A	03302022-13	0.00000110%	0.00000441%	ND	ND	< 0.00001%	ND	46.29%	1.91%	51.80%	results reported on a dry weight basis

Chain of Custody: 635810

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 3 (No. 03302022)

Job Number: CLIN 1001 PO Number: 75F40119P10689 Date Submitted: 4/25/2022 Date Analyzed: 5/12/2022 - 6/2/2022

Report Date: 9/16/2022 Date Sampled: Not Provided Person Submitting: Martha Schwartz

Revised:

#### **SUMMARY OF ANALYSIS**

		TEM LOD	TEM LOQ	% Chrysotile by TEM	% Tremolite by TEM	% Total Chrysotile & Tremolite by TEM	%	%	% Acid	%	
AMA Sample ID	Client Sample ID	Using ASTM D5756 Mass Calculation	Asbestos by PLM	Organics	Soluable	Other	Comments				
635810-13B	03302022-13	0.00000117%	0.00000468%	ND	ND	< 0.00001%	ND	47.20%	1.81%	50.99%	results reported on a dry weight basis
635810-13C	03302022-12	0.00000094%	0.00000375%	ND	ND	< 0.00001%	ND	46.35%	1.15%	52.49%	results reported on a dry weight basis

LOD = Limit of Detection

LOQ = Limit of Quantification

ND = Not Detected

PLM = Polarized Light Microscopy

TEM = Transmission Electron Microscopy

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

TEM by Modified NY ELAP 198.4/ASTM D5756

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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Login Sheet	Errorl Bookmark not defined
Analytical Balance Verification Log	
Daily PLM Scope Verification Log	
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Daily TEM Scope Verification Log(s)	
QC Results Summary	
NB (Matrix) Blank Preparation Log	
NB (Matrix) Blank Analytical Bench Sheet(s)	
RB (Reference Sample) Analytical Bench Sheet(s)	
EB (TEM Grid) Blank Preparation Log	
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Replicate QC Analytical Bench Sheet(s)	Error! Bookmark not defined.
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635810-16RQC (635810-10A/03302022-10)	Error! Bookmark not defined.

# **Record Changes Report**

Date	Description
9/23/2022	1) p. 32, corrected small typo (removed extraneous "f") in first paragraph on page
	2) p. 32, added preparation steps for liquid samples
	3) p. 34, in calculations section, specified that for liquid samples, the value for W1 in gravimetric reduction percentages is the dry weight mass

### **Chain of Custody**

AMA Analytical Services, Inc.
Focused On Results.
AIHA-LAP (#100470) NVLAP (#101143-0) NY ELAP (#10920)
4475 Forbes Blvd. • Lanham, MD 20706

(COC # Assigned upon arrival at lab.) 635810

# CHAIN OF CUSTODY

4473 Forbes BIVG. • Lannam, NID 20706		CHAINOFCO	STODI		
(301) 459-2640 • (800) 346-0961 • Fax (301) 4 www.amalab.com	159-2643	Asbestos in Talc/	Cosmetics		
Mailing/Billing Information: Client Name: US Food & Drug Address: Office of Cosmetic: Address: 4300 River Road Address: College Park, MD 2 Phone #:  Reporting Info (  After Hours (must be pre-sche After Hours Service is not pro Asbestos in Tale/Cosmetics.	s and Colo 20740  Fax #:  Results provide  TUF  Eduled)  vided for	ration         Job N           DTS         Job L           Job M         Point	cation: Batch ( CLIN 1001 of Contact: John ted by: provided, AMA wil	Gasper  I assign defaults of 6-Week	) : 75F40119P10689 cett#: 240-402-1133 
Data Package Level [Select One]:	Standard (Cert	Sample Type  ✓ FDA Modified Procedures for PLM-ELAP 198.6  tifficate of Analysis & Signed COC) Level I (Standard + QA			Level III (II + Case Narrative)
*If field data sheets are submitted	d, there is no nee	d to complete bottom section VAll sample	es received in good co	ondition unless otherwise not	ed.
		Sample Informat			
Sample Number	No. of Aliquots to Prepare & Analyze	Sample Description (ie, color, c		al being submitted for analysis]	Comments/Instructions
Item #s 1 thru 13	3	11 '1-oz glass jars submitted in pink v	acuum seal	ed plastic bags	
		and 12 (6/sample) 50-mL plastic cent	rifuge tubes	in pink	
		vacuum sealed plastic bags with cust	odv seals in	tact (sealed by	
		M. Schwartz 4/13/2022-4/19/2022)	ody codio ii i	taet (eealea s)	
		See attached FDA COC for additional	l details.		
	Print Name	Sign Name	Date	Time	
Relinquised by:	\ /				Shipping Information   UPS   In-Person   Other   FedEx   Drop Box
Received by:			/25/2022	11:05	1Z4995A0390429360
	/ (	<u> </u>			



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

April 19, 2022

AMA Analytical Services, Inc.

Attn:(b) (6)

4475 Forbes Blvd. Lanham, MD 20706 Phone: 301-459-2640

Re: Samples for Asbestos Analysis, Batch #03302022

Dear(b) (6)

Enclosed in box are thirteen (13) commercial talc-containing cosmetic products, 11 solid and 2 liquid, being submitted for analysis for asbestiform fibers by transmission electron microscope (TEM) per FDA Assignment DFPG #22-08, 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 thirteen (13) samples in this shipment constitute Batch 3 (No. 03302022) 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

Mortka & Sahwart

Enclosure: Chain of custody

	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-C	ustody Form	Page 1 of 3

Batch No:03302022	
Submitter:Martha H. Schwartz	e
Assignment No./ Contract No.:DFPG #22-08 / #75F40119P10689	
AMA COC No.:	
Date Sealed:4/20/2021 Sample Type:Official Samples	

	Description of Evidence								
Item #	Quantity	Description of Item (Lab#, Lot #, Condition)							
03302022-1	1.	Approx. 5 g of prepared talc-containing cosmetic sample							
03302022-2	1								
03302022-3	1								
03302022-4	1								
03302022-5	1								
03302022-6	1								
03302022-7	1								
03302022-8	1								
03302022-9	1								
03302022-10	1								
03302022-11	1								
03302022- 12.1-12.6	6	50-mL centrifuge tubes containing ~30 mL of liquid air-brush makeup product 50-mL centrifuge tubes containing ~30 mL of liquid air-brush makeup product							
03302022- 13.1-13.6	6								
13.1-13.6									

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.

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 2 of 3

	<b>连续混乱</b> 是1	Chain of	Custody	
Item #	Date	Released by (Print Name)	Released by (Signature)	Comments/Location
1-13	4/20/22	Martha H. Schwartz	Murtha T. Schwarz	ORS/DENL
	0			

		Chain of	Custody	
Item #	Date/Time	Received by	Received by	Comments/Location
	Whehma / h	v) (e)	<u> </u>	104
1-13	Whishopp (	o) (6)	_	Hvar
		, , ,		
				5

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.

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

Witness to Destru	ction of Evidence	AND THE PARTY OF T		
Item(s) #: on this document were destroyed by (Name)				
in my presence on (date)				
n my presence on (date)  Name of Witness to destruction:	Signature:	Date:		
		F207-116		
Release to La	wful Owner			
Item(s) #; on this document was/were released ID#; to	by Evidence Custodian			
Name				
Address:	City:	State:		
Zip Code:				
Telephone Number: ()				
Under penalty of law, I certify that I am the lawful owner of the above item(s).				
Si	Datas			
Signature:	Date			
Copy of Government-issued photo identification is attached. ☐ Yes ☐ No				
This form is to be retained as a permanent record by the Center for Food Safety and Applied Nutrition, 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.

MARTHA H. SCHWARTZ 3032369653 FDA-ORA-SW-DO-DEN 1 DENVER FEDERAL CTR RM FLR DF DENVER CO 80225

**UPS GROUND** 

Test Don: ORA SW Center/Office: DEN DO CS 22.0.18.

TRACKING #: 1Z A49 95A 03 9042 9360

SHIR TO: (b) (6) 301-459-2640 AMA ANALYTICAL SERVICES, INC. 4475 FORBES BLVD LANHAM MD 20706-4354

5 LBS

1 OF 1

**\*** 

FOLD HERE

# UPS CampusShip: View/Print 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.
- 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.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center,
Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Sentices(SM) (including via Ground) are also accepted at
Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.
Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
Hand the package to any UPS driver in your area.

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

4/20/2022, 6:24 AM

1 of 1

# **Proof of Delivery**

Dear Customer,

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

#### Tracking Number

1ZA4995A0390429360

#### Weight

5.00 LBS

#### Service

**UPS** Ground

#### Shipped / Billed On

04/20/2022

#### **Delivered On**

04/25/2022 11:05 A.M.

#### **Delivered To**

LANHAM, MD, US

#### Received By



#### Left At

Reception

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: 05/04/2022 5:36 P.M. EST



Please see below for package information and current transit status.

Scheduled Delivery Date: Monday, 04/25/2022

UPS My Choice for home



#### **Shipment Details**

#### **Tracking Detail**

Your package is on time with a scheduled delivery date of 04/25/2022

Tracking Number: <u>1ZA4995A0390429360</u>

Status:DeliveredScheduled Delivery:04/25/2022Shipped To:LANHAM, MD, USUPS Service:UPS Ground

Number of Packages: 1

Weight: 5.0 LBS

Package Progress				
Location	Date	Local Time	Description	
LANHAM, MD, US	04/25/2022	11:05 AM	DELIVERED	
Landover, MD, United States	04/25/2022	9:22 AM	Out For Delivery Today	
Landover, MD, United States	04/23/2022	7:07 AM	Processing at UPS Facility	
Landover, MD, United States	04/22/2022	7:59 PM	Arrived at Facility	
Laurel, MD, United States	04/22/2022	7:25 PM	Departed from Facility	

Laurel, MD, United States	04/22/2022	11:49 AM	Arrived at Facility
Harrisburg, PA, United States	04/22/2022	9:45 AM	Departed from Facility
Harrisburg, PA, United States	04/22/2022	9:16 AM	Arrived at Facility
Commerce City, CO, United States	04/21/2022	4:16 AM	Departed from Facility
Commerce City, CO, United States	04/20/2022	6:47 PM	Origin Scan
Commerce City, CO, United States	04/20/2022	3:35 PM	Pickup Scan
United States	04/20/2022	6:23 AM	Shipper created a label, UPS has not received the package yet.

Tracking results provided by UPS 05/04/2022 5:37 P.M. Eastern Time

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# **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. 03302022 (Batch #3)

AMA COC Number: 635810 Date Received: April 25, 2022

AMA Sample No.	Client Sample No.	Sample Description	Analytical Method
635810-1A	03302022-1	Very pale pink colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-1B	03302022-1		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-1C	03302022-1		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-2A	03302022-2	Off-white colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-2B	03302022-2		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-2C	03302022-2		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-3A	03302022-3	Cream colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-3B	03302022-3		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-3C	03302022-3		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-4A	03302022-4	Pale tan colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-4B	03302022-4		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-4C	03302022-4		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-5A	03302022-5	Cream colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4

AMA Sample No.	Client Sample No.	Sample Description	Analytical Method
635810-5B	03302022-5		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-5C	03302022-5		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-6A	03302022-6	Lime green colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-6B	03302022-6		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-6C	03302022-6		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-7A	03302022-7	Off-white colored, fine powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-7B	03302022-7		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-7C	03302022-7		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-8A	03302022-8	Nude colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-8B	03302022-8		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-8C	03302022-8		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-9A	03302022-9	Pale yellow colored, fine powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-9B	03302022-9		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-9C	03302022-9		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-10A	03302022-10	Brown colored, slightly clumpy powder with a matte appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-10B	03302022-10		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-10C	03302022-10		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-11A	03302022-11	Dark burgundy colored, slightly clumpy powder with a pearlescent appearance	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-11B	03302022-11		Mod. PLM ELAP 198.6/TEM ELAP 198.4

AMA Sample No.	Client Sample No.	Sample Description	Analytical Method
635810-11C	03302022-11		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-12A	03302022-12.1 (PLM) 03302022-12.2 (TEM)	Tan colored, opaque liquid	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-12B	03302022-12.3 (PLM) 03302022-12.4 (TEM)		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-12C	03302022-12.5 (PLM) 03302022-12.6 (TEM)		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-13A	03302022-13.1 (PLM) 03302022-13.2 (TEM)	Off-white colored, opaque liquid	Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-13B	03302022-13.3 (PLM) 03302022-13.4 (TEM)		Mod. PLM ELAP 198.6/TEM ELAP 198.4
635810-13C	03302022-13.5 (PLM) 03302022-13.6 (TEM)		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 April 25, 2022, at 11:05 via UPS Tracking No. 1ZA4995A0390429360 by (b) (6) , who assigned them to Chain of Custody (COC) No. 635810. This COC number served as the internal laboratory job number for tracking purposes. The set consisted of eleven (11) powder samples submitted in ~1-oz glass jars, and two (2) liquid samples submitted in six (6) 50mL centrifuge tubes per sample. Each jar of powder was sealed with parafilm and individually packaged in a vacuum and custody sealed plastic bag. Each centrifuge tube was sealed with parafilm and individually packaged in a vacuum sealed plastic bag; each group of six (6) centrifuge tubes was custody sealed together in a larger vacuum sealed plastic bag. Conditions were checked upon receipt and all sample containers and custody seals were intact. The samples were entered into the AMA laboratory database on May 4, 2022 at 13:51 by Dana Hudson. 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:









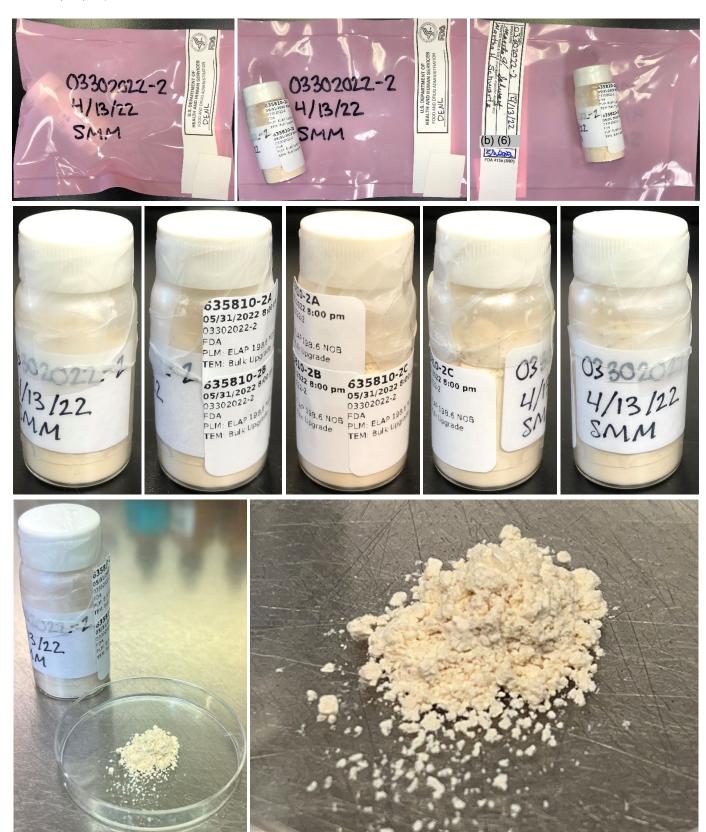




#### 635810-1A, 1B, 1C/03302022-1



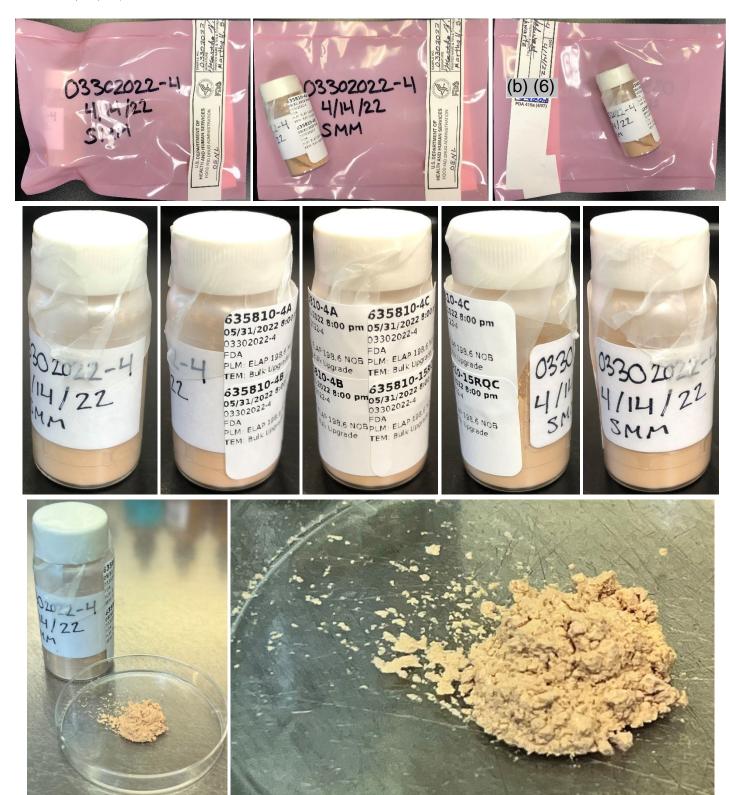
#### 635810-2A, 2B, 2C/03302022-2



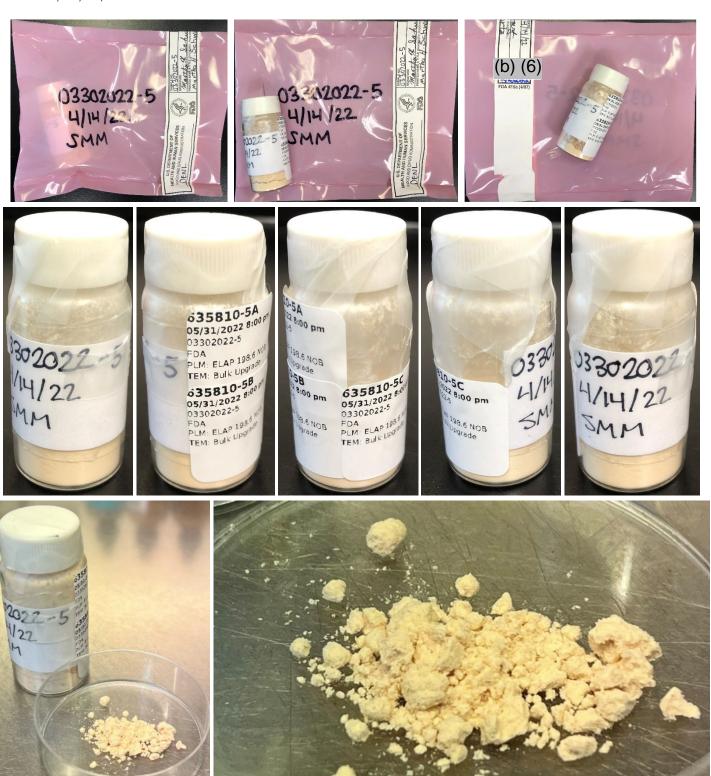
#### 635810-3A, 3B, 3C/02212022-3



#### 635810-4A, 4B, 4C/02212022-4



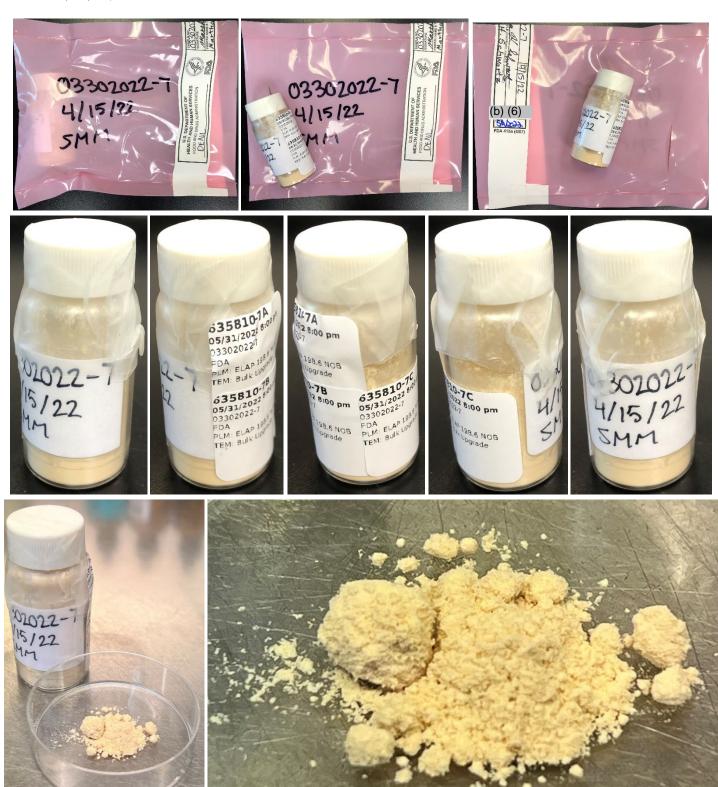
#### 635810-5A, 5B, 5C/03302022-5

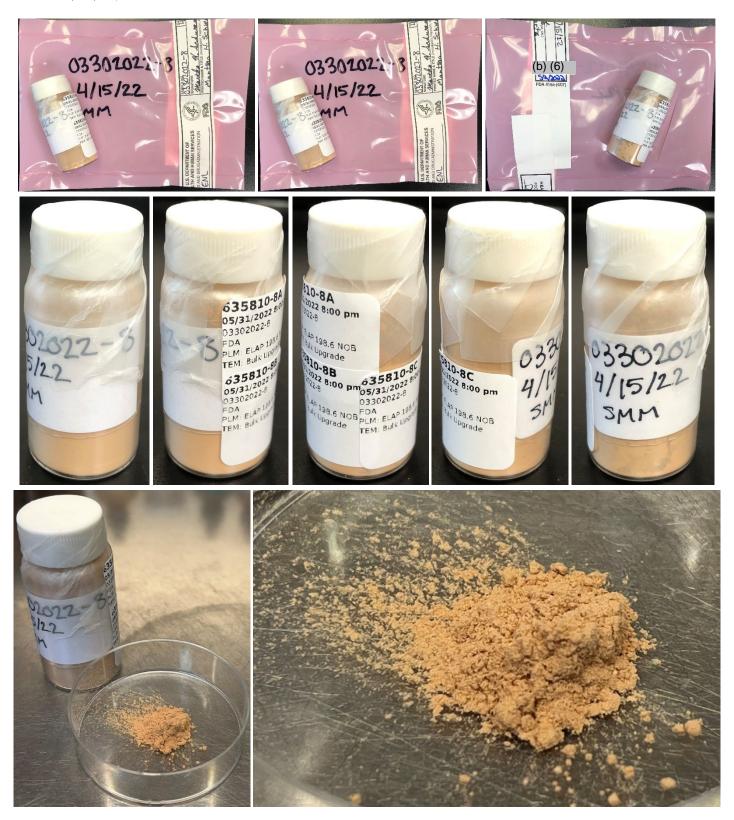


#### 635810-6A, 6B, 6C/03302022-6



#### 635810-7A, 7B, 7C/03302022-7

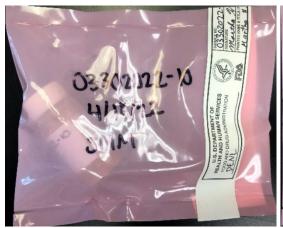


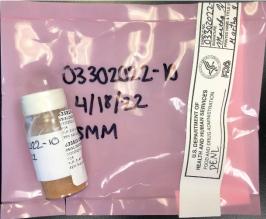


#### 635810-9A, 9B, 9C/03302022-9



#### 635810-10A, 10B, 10C/03302022-10













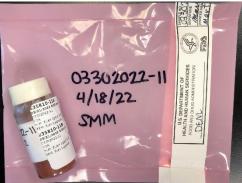


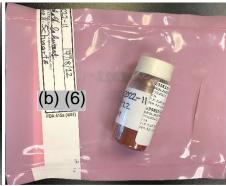




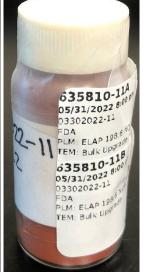
#### 635810-11A, 11B, 11C/03302022-11





















#### 635810-12A, 12B, 12C/03302022-12





#### 635810-13A, 13B, 13C/03302022-13















#### **Sample Preparation**

Samples were gravimetrically reduced and filtered by (b) (6) on: May 5, 2022, through May 9, 2022, for 635810-1A through 635810-3C and NB22-286/287; May 11, 2022, through May 13, 2022, for 635810-4A through 635810-6C, 635810-15RQC, and NB22-295/296; May 18, 2022, through May 20, 2022, for 635810-7A through 635810-11C, 635810-16RQC, and NB22-305/306; May 25, 2022, through May 27, 2022, for the TEM aliquots of 635810-12A through 635810-13C and NB22-314; May 31, 2022, through June 2, 2022, for the PLM aliquots of 635810-12A through 635810-13C and NB22-324; and June 1, 2022, through June 3, 2022, for 635810-14DQC and NB22-328/329. PLM slide preparations were made by (b) (6) on: May 6, 2022, for 635810-1A through 635810-3C and NB22-287; May 12, 2022, for 635810-4A through 635810-6C, 635810-15RQC, and NB22-296; May 19, 2022, for 635810-7A through 635810-11C, 635810-16RQC, and NB22-306; June 2, 2022, for 635810-12A through 635810-13C and NB22-324; and June 2, 2022, for 635810-14DQC and NB22-329. TEM grid preparations were made by: (b) (6) on May 11, 2022, 635810-1A through 635810-3C and NB22-286; (b) (6) on May 16, 2022, for 635810-4A through 635810-6C, 635810-15RQC, and NB22-295; (b) (6) on May 23, 2022, for 635810-7A through 635810-11C, 635810-16RQC, and NB22-305; (b) (6) May 31, 2022, for 635810-12A through 635810-13C and NB22-314; and (b) (6) on June 3, 2022, for 635810-14DQC and NB22-328. Sample preparation for powder materials 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.

Sample preparation for liquid materials consisted of the following steps:

- 1) Add an aliquot of liquid to a pre-weighed crucible.
- 2) Record wet weight.
- 3) Place crucible into drying for 12-20 hours.
- 4) Record dry weight.
- 5) Follow steps 3 through 13 above.

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

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

#### Problems Encountered During Preparation & Resolutions:

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

#### **PLM Analysis**

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

#### **Point Counting**

If asbestos was observed on the slide preparations, the amount of asbestos was quantified using point count techniques. Point counting is form of quantifying PLM samples. One of the oculars of each PLM microscope is etched with a crosshair. When point counting, whatever is under the crosshair is counted as one point of whatever the material is. Four (4) slide preparations with a total of eight (8) coverslips are prepared for each sample. The microscope mechanical 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 For liquid samples, the value for W1 is the dry weight mass.

Asbestos Percent Calculation:

TEM PLM

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

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

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

#### **Discussion and Interpretation of Analytical Findings**

635810-1A, 1B, 1C/Client Sample: 03302022-1

PLM

All three aliquots of sample 03302022-1 were analyzed by (b) (6) on June 2, 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.

635810-1A No Asbestos Detected 635810-1B No Asbestos Detected 635810-1C No Asbestos Detected

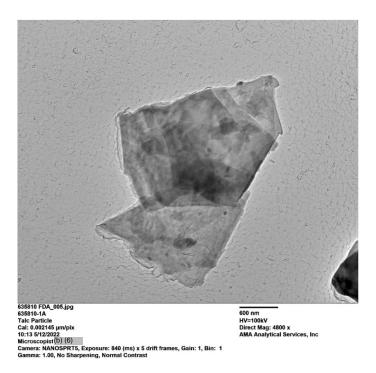
TEM

(b) (6) analyzed aliquots 1A and 1B on May 12, 2022, and aliquot 1C on May 16, 2022. The primary particles observed were talc and mica; silica spheres and silicon particles were also observed along with talc ribbons, and elongated talc 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.

635810-1A No Asbestos Detected 635810-1B No Asbestos Detected 635810-1C 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.

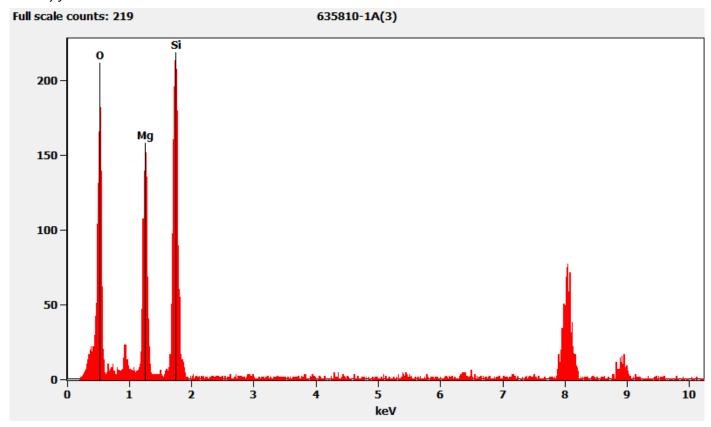
#### 635810-1A, Talc Particle



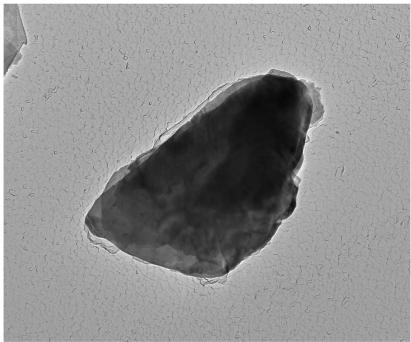
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



# Chemistry from the Talc Particle Pictured Above



635810-1A, Mica Particle



635810 FDA\_003.jpg 635810-1A Mica Particle Cal: 0.002145 µm/pix 10:12 5/12/207(b) (6) Microscopist Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

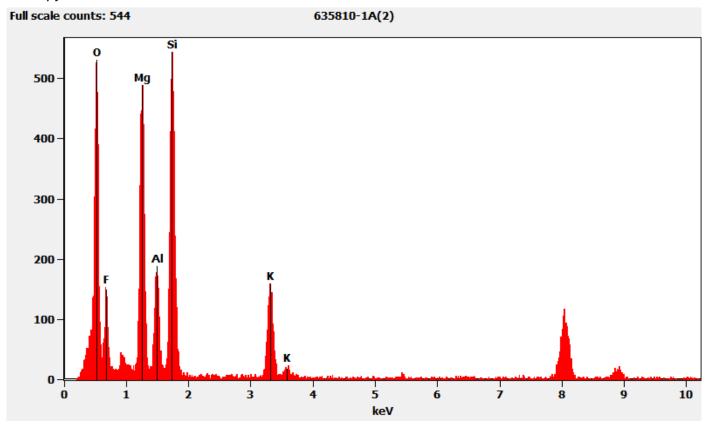
# Diffraction Pattern from the Mica Particle Pictured Above



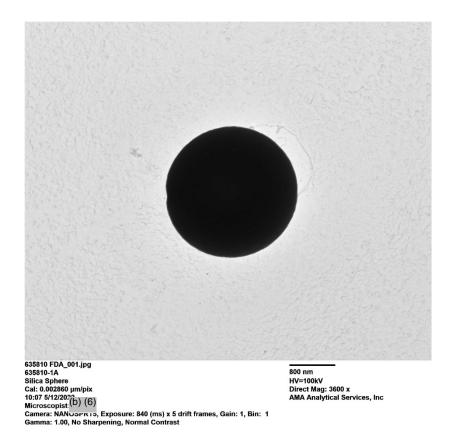
635810 FDA\_002.jpg 635810-1A Mica Particle 10:11 5/12/2022 Microscopist (b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

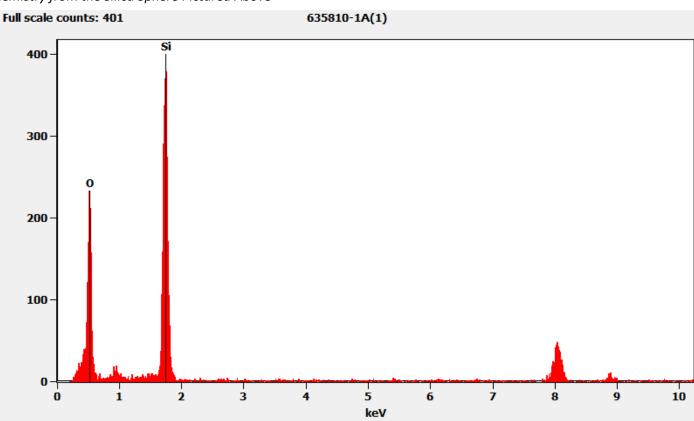
# Chemistry from the Mica Particle Pictured Above



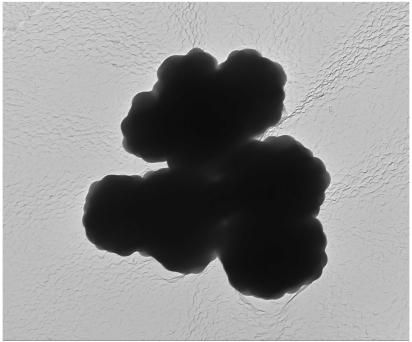
635810-1A, Silica Sphere



## Chemistry from the Silica Sphere Pictured Above



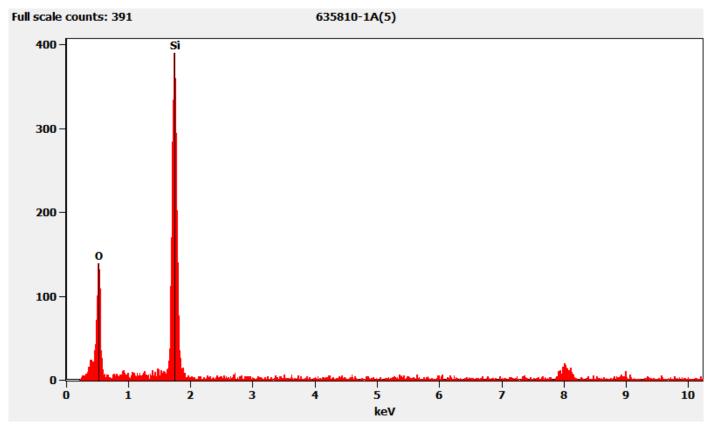
#### 635810-1A, Silicon Particles



635810 FDA\_007.jpg 635810-1A Silica Particles Cal: 0.001775 µm/pix 10:42 5/12/20?? Microscopist(b) (6) Camera: NANUSPK 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

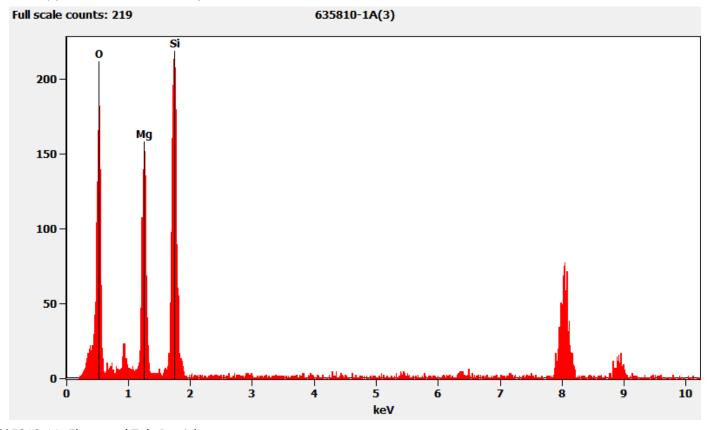
Chemistry from the Silicon Particle Pictured Above



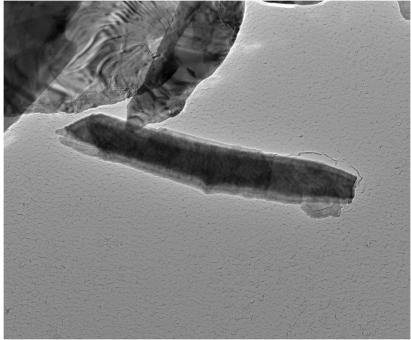
635810-1A, Talc Ribbon Diffraction Pattern



# Chemistry from the Talc Ribbon Referenced Above



635810-1A, Elongated Talc Particle



635810 FDA\_009.jpg 635810-1A Talc Fiber Cal: 0.002860 µm/pix 11:07 5/12/207(b) (6) Microscopist (b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

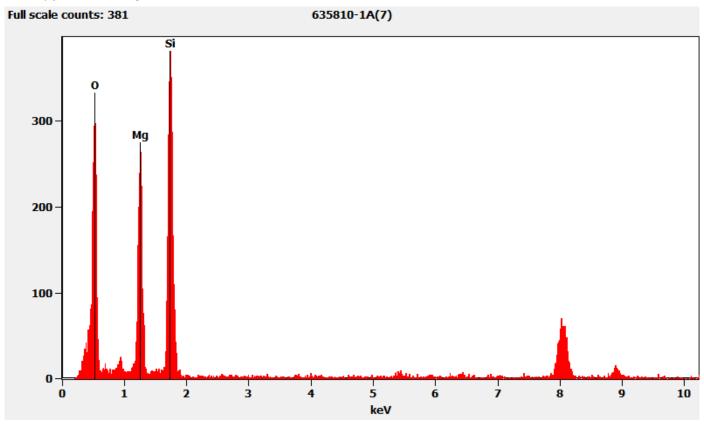
## Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



635810 FDA\_008.jpg 635810-1A Talc Fiber 11:06 5/12/2022 Microscopis (b) (6) Camera: NAN-UST N. 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Chemistry from the Elongated Talc Particle Pictured Above



635810-2A, 2B, 2C/Client Sample: 03302022-2

#### PLM

All three aliquots of sample 03302022-2 were analyzed by (b) (6) on June 2, 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.

635810-2A	No Asbestos Detected
635810-2B	No Asbestos Detected
635810-2C	No Asbestos Detected

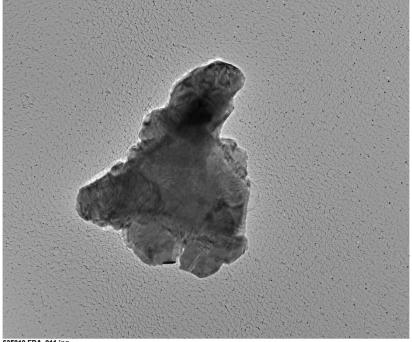
#### TEM

(b) (6) analyzed aliquots 2A and 2B on May 12, 2022, and aliquot 2C on May 16, 2022. The primary particles observed were mica and talc; elongated mica and talc particles were also observed. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

635810-2A	No Asbestos Detected
635810-2B	No Asbestos Detected
635810-2C	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.

#### 635810-2A, Mica Particle



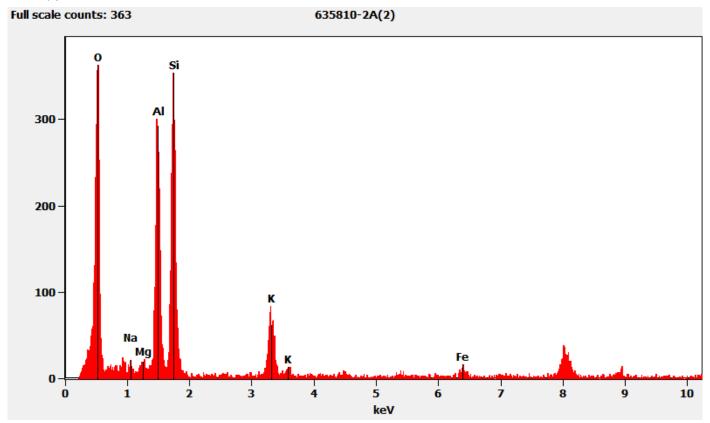
635810 FDA\_011.jpg 635810-2A Mica Particle Cal: 0.003702 µm/pix 11:44 5/12/2022 Microscopis (b) (6) Camera: NANUSPK 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

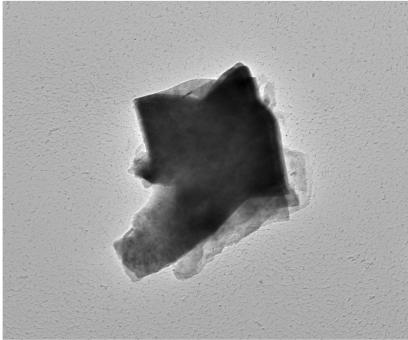
Hexagonal Diffraction Pattern from the Mica Particle Pictured Above



## Chemistry from the Mica Particle Pictured Above



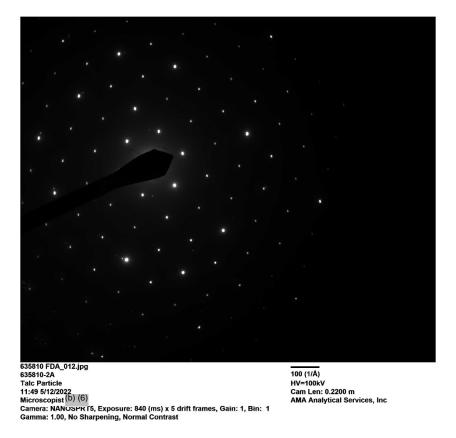
## 635810-2A, Talc Particle



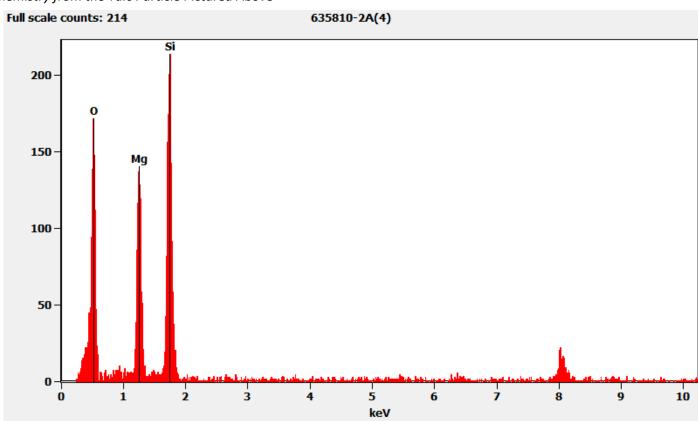
635810 FDA\_013.jpg 635810-2A Talc Particle Cal: 0.002860 µm/pix 11:49 5/12/2022 Microscopist (b) (6) Camera: NANOGENIA, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

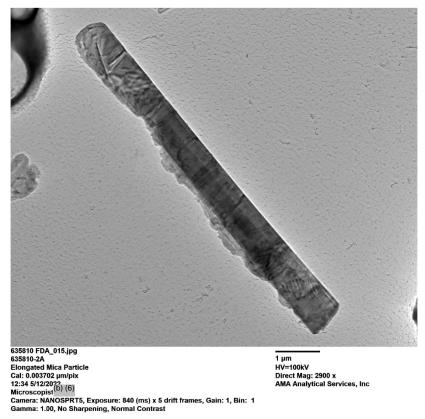
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



## Chemistry from the Talc Particle Pictured Above



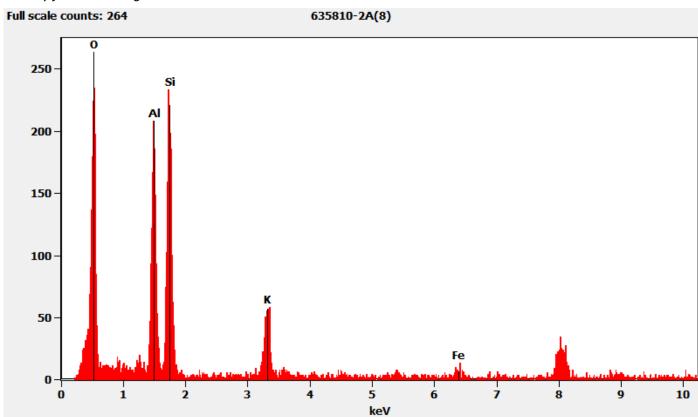
635810-2A, Elongated Mica Particle



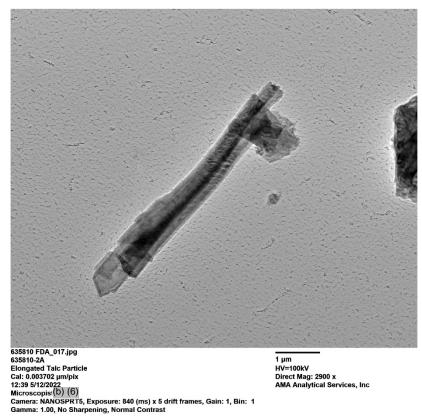
Hexagonal Diffraction Pattern from the Elongated Mica Particle Pictured Above



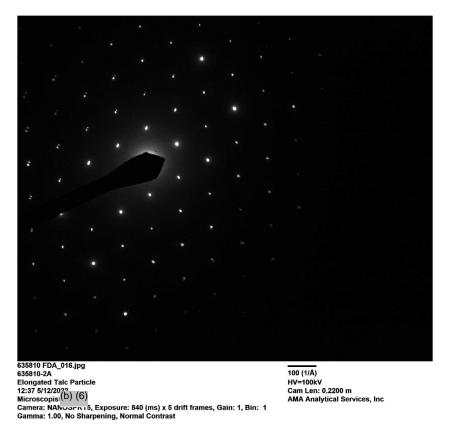
## Chemistry from the Elongated Mica Pictured Above



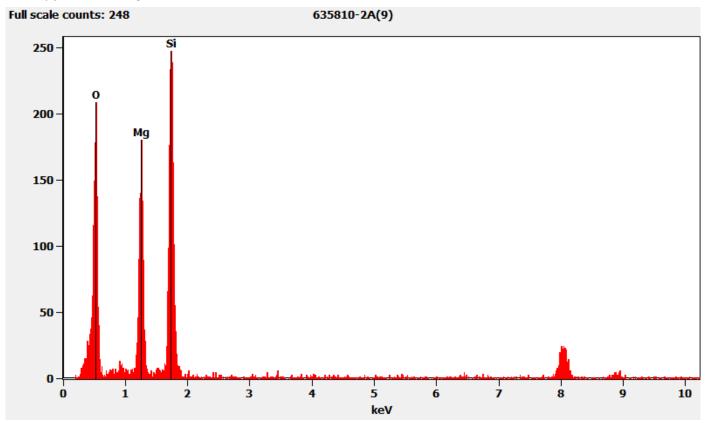
635810-2A, Elongated Talc Particle



Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



Chemistry from the Elongated Talc Particle Pictured Above



#### 635810-3A, 3B, 3C/Client Sample: 03302022-3

#### **PLM**

All three aliquots of sample 03302022-3 were analyzed by (b) (6) on June 2, 2022. No asbestos or nonasbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the Calculations section above.

635810-3A	No Asbestos Detected
635810-3B	No Asbestos Detected
635810-3C	No Asbestos Detected

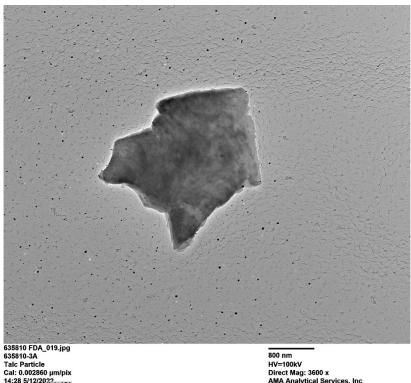
#### **TEM**

(b) (6) analyzed aliquot 3A on May 12, 2022, and aliquots 3B and 3C on May 13, 2022. The primary particle observed was talc; particles containing magnesium, aluminum and silicon were also observed along with talc ribbons/elongated talc 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.

635810-3A	No Asbestos Detected
635810-3B	No Asbestos Detected
635810-3C	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.

#### 635810-3A, Talc Particle



14:28 5/12/2022 Microscopist (b) (6)

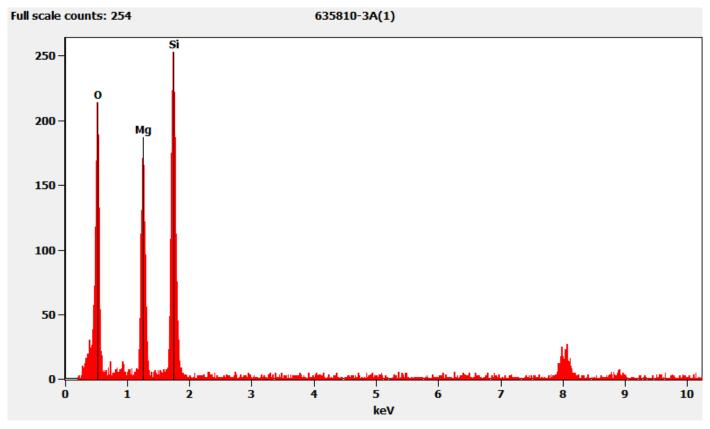
Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 a: 1.00, No Sharpening, Normal Contrast

AMA Analytical Services, Inc

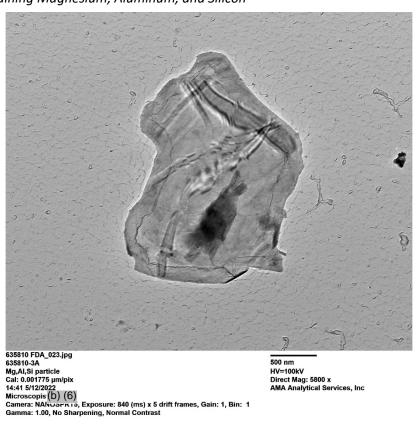
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



Chemistry from the Talc Particle Pictured Above



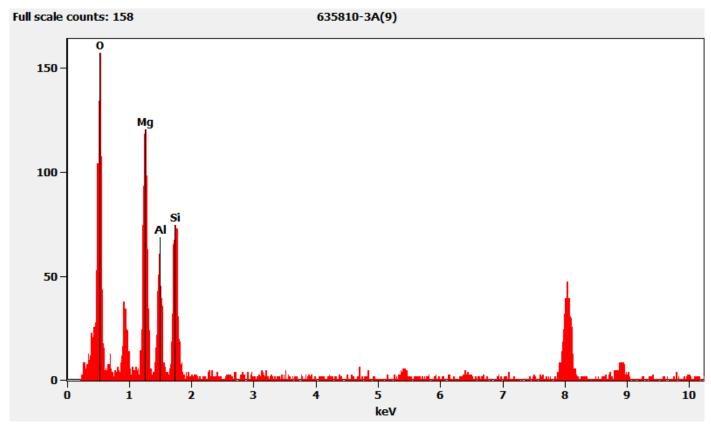
635810-3A, Particle Containing Magnesium, Aluminum, and Silicon



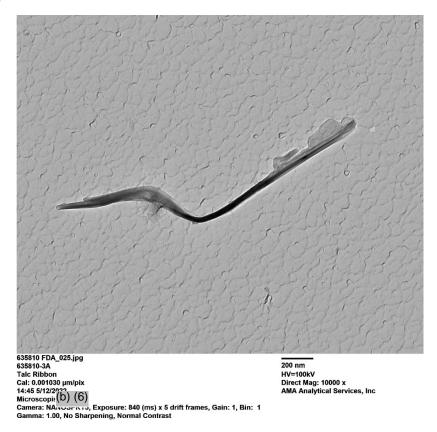
Hexagonal Diffraction Pattern from the Particle Containing Magnesium, Aluminum, and Silicon Pictured Above



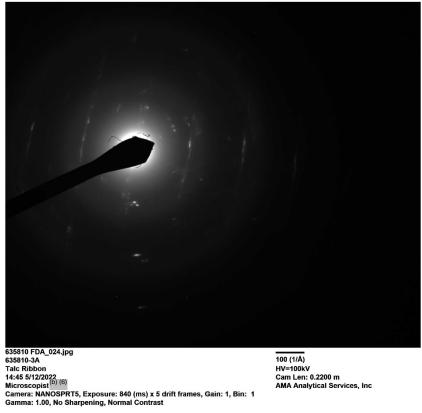
Chemistry from the Particle Containing Magnesium, Aluminum, and Silicon Pictured Above



635810-3A, Talc Ribbon

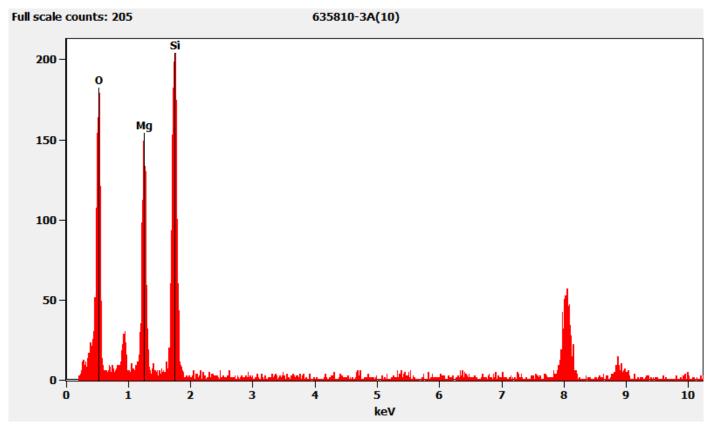


Diffraction Pattern from the Talc Ribbon Pictured Above

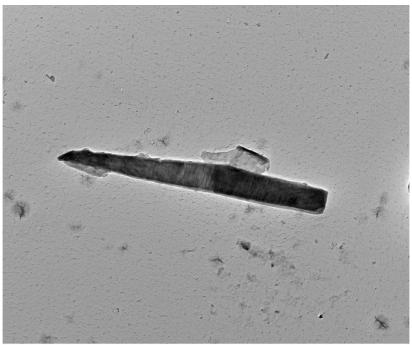


100 (1/Å) HV=100kV Cam Len: 0.2200 m AMA Analytical Services, Inc

Chemistry from the Talc Ribbon Pictured Above



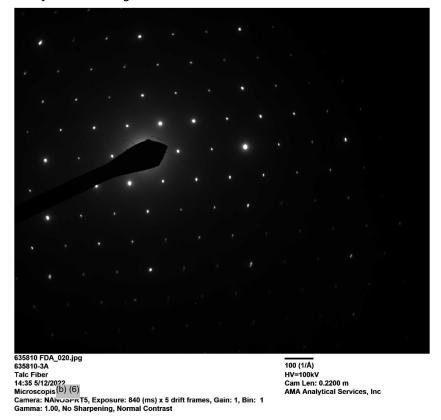
635810-3A, Elongated Talc Particle



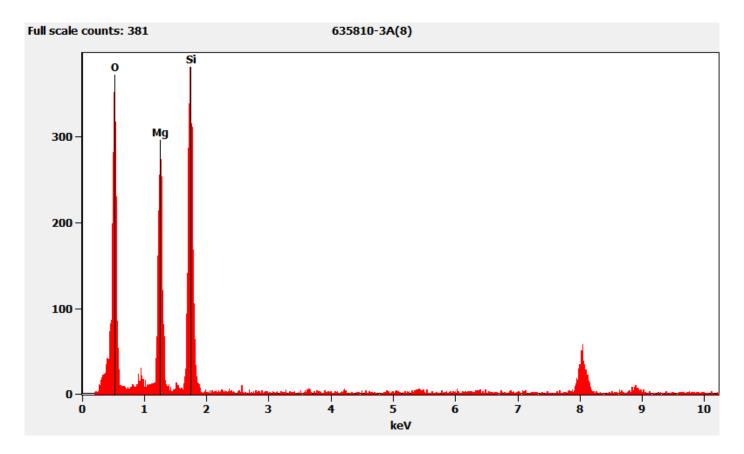
63810 FDA 021.jpg 635810-3A Talc Fiber Cal: 0.002860 μm/pix 14:36 5/12/2070 (6) Microscopist: (6) Microscopist: (7) Camera: NAN-σ. τ. 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



Chemistry from the Elongated Talc Particle Pictured Above



635810-4A, 4B, 4C/Client Sample: 03302022-4

# PLM All three aliquots of sample 03302022-4 were analyzed by (b) (6) on June 2, 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.

635810-4A No Asbestos Detected 635810-4B No Asbestos Detected 635810-4C No Asbestos Detected

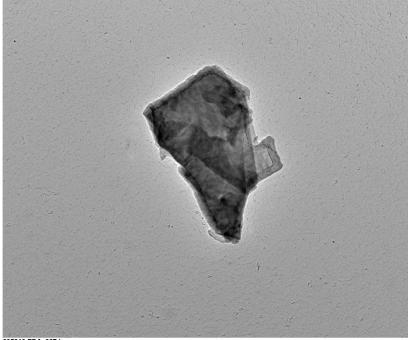
#### **TEM**

(b) (6) analyzed aliquot 4A on May 16, 2022, and aliquots 4B and 4C on May 18, 2022. The primary particle observed was talc; talc ribbons were also observed along with particles containing magnesium, aluminum, silicon, and iron, titanium particles, mica particles with titanium, iron particles, calcium particles, and elongated talc 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.

635810-4A No Asbestos Detected 635810-4B No Asbestos Detected 635810-4C 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.

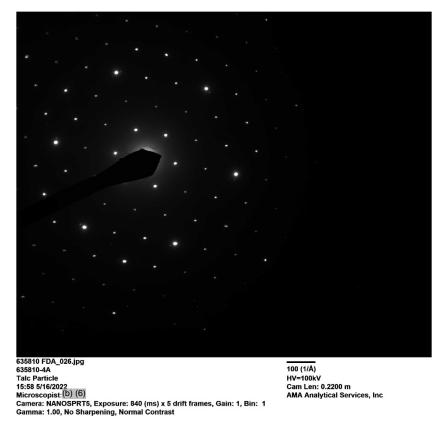
## 635810-4A, Talc Particle



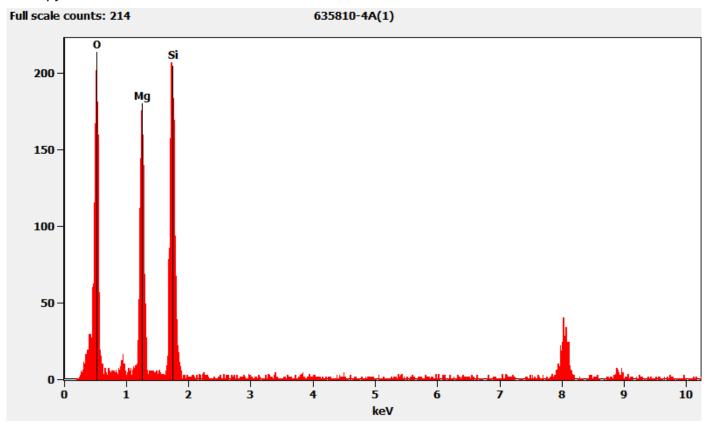
635810 FDA\_027.jpg 635810-4A Talc Particle Cal: 0.002860 µm/pix 15:59 5/16/2022 Microscopist (b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

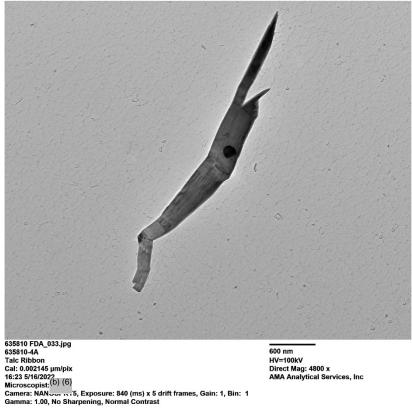
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



## Chemistry from the Talc Particle Pictured Above



## 635810-4A, Talc Ribbon

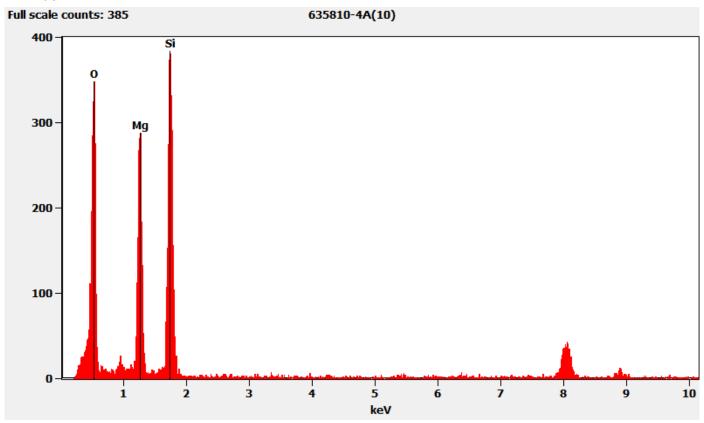


600 nm HV=100kV Direct Mag: 4800 x AMA Analytical Services, Inc

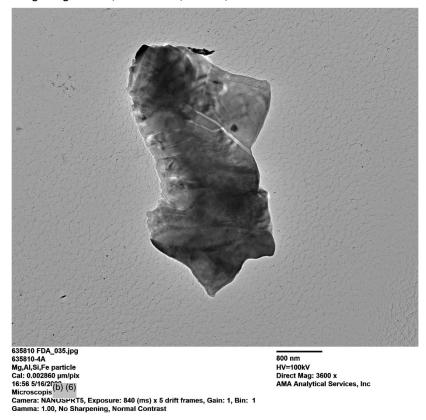
Diffraction Pattern from the Talc Ribbon Pictured Above



## Chemistry from the Talc Ribbon Pictured Above



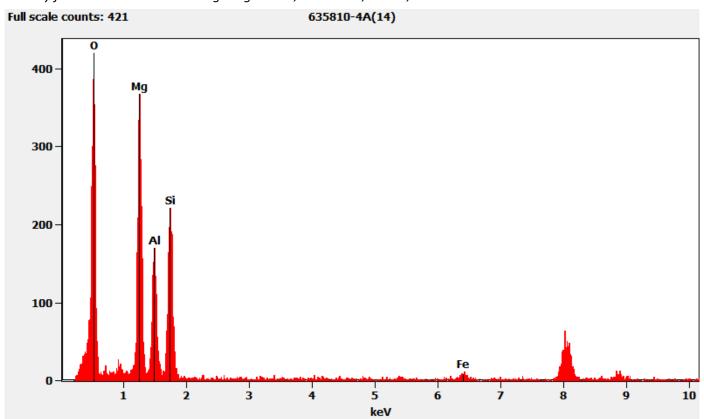
635810-4A, Particle Containing Magnesium, Aluminum, Silicon, and Iron



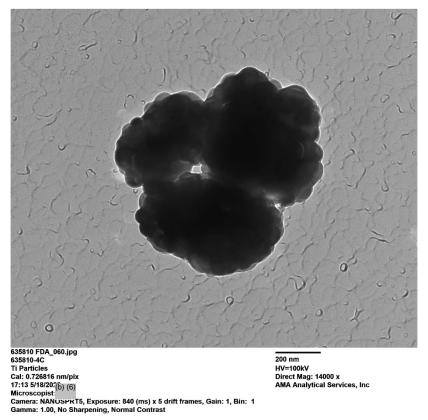
Hexagonal Diffraction Pattern from the Particle Containing Magnesium, Aluminum, Silicon, and Iron Pictured Above



Chemistry from the Particle containing Magnesium, Aluminum, Silicon, and Iron Pictured Above



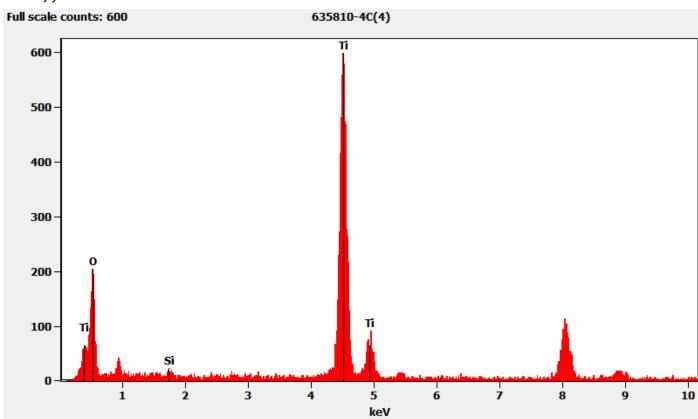
635810-4C, Titanium Particles



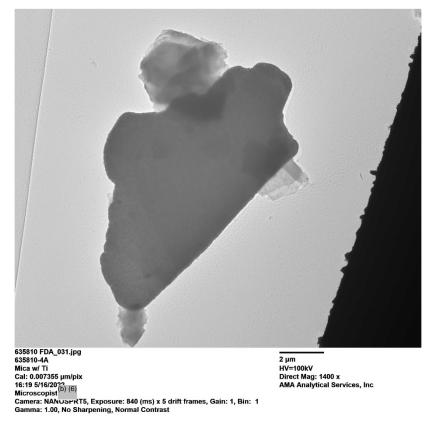
Diffraction Pattern from the Titanium Particles Pictured Above



## Chemistry from the Titanium Particles Pictured Above



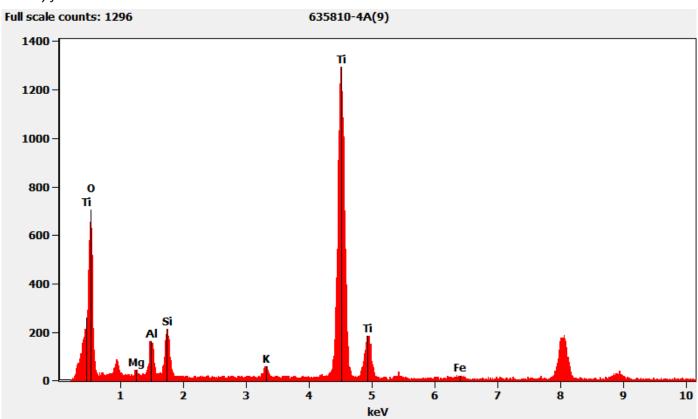
635810-4A, Mica Particle with Titanium



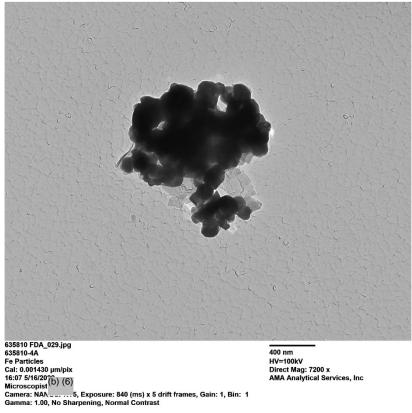
Diffraction Pattern from the Mica Particle with Titanium Pictured Above



Chemistry from the Mica Particle with Titanium Particle Pictured Above



# 635810-4A, Iron Particle

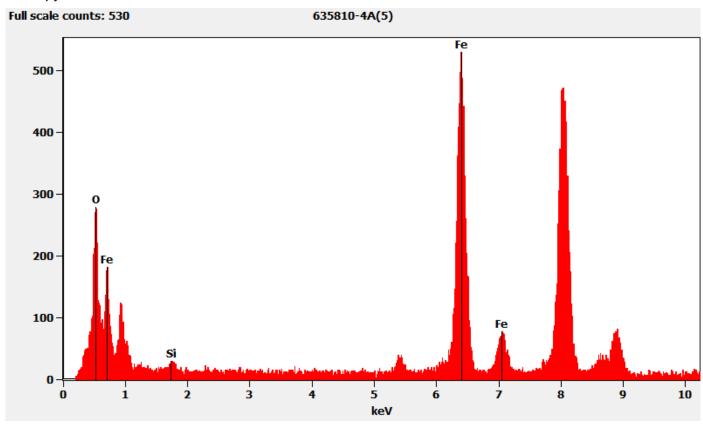


400 nm HV=100kV Direct Mag: 7200 x AMA Analytical Services, Inc

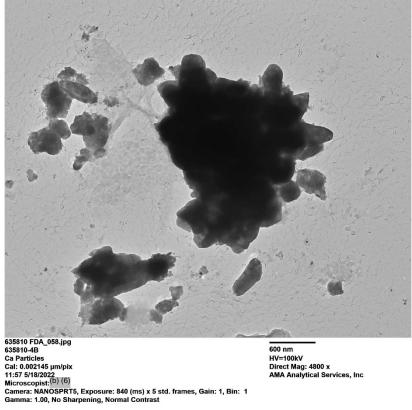
Diffraction Pattern from the Iron Particle Pictured Above



# Chemistry from the Iron Particle Pictured Above



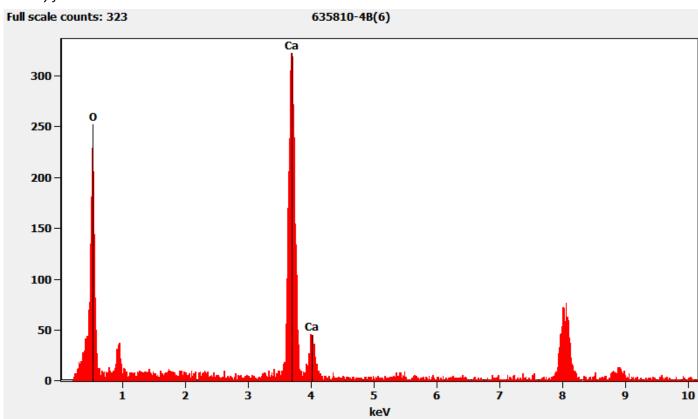
# 635810-4B, Calcium Particle



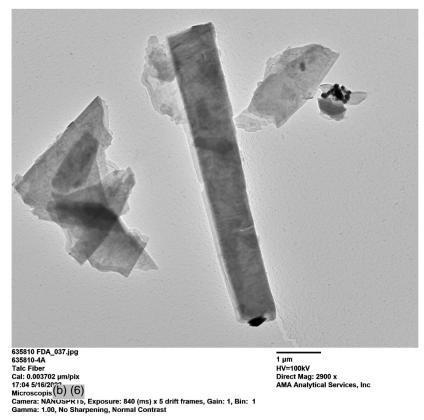
Diffraction Pattern from the Calcium Particle Pictured Above



# Chemistry from the Calcium Particle Pictured Above



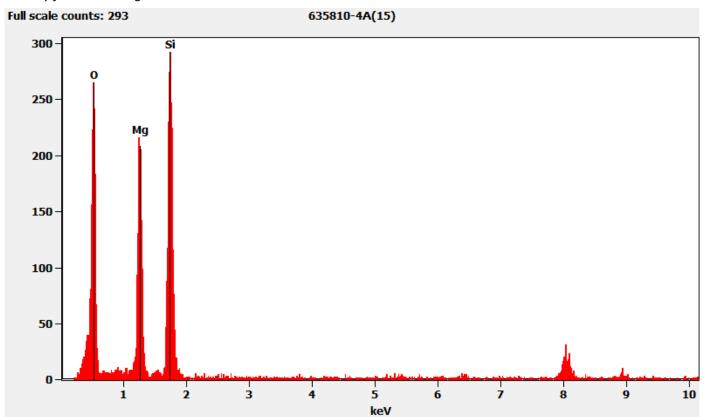
# 635810-4A, Elongated Talc Particle



Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



Chemistry from the Elongated Talc Particle Pictured Above



#### 635810-5A, 5B, 5C/Client Sample: 03302022-5

#### PLM

All three aliquots of sample 03302022-5 were analyzed by (b) (6) on June 2, 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.

635810-5A	No Asbestos Detected
635810-5B	No Asbestos Detected
635810-5C	No Asbestos Detected

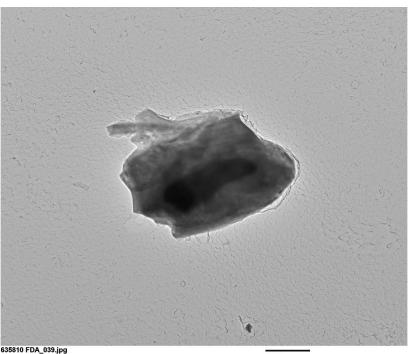
#### **TEM**

(b) (6) analyzed aliquot 5A on May 16, 2022, and aliquots 5B and 5C on May 18, 2022. The primary particle observed was talc; silica spheres and talc ribbons were also observed along with particles containing magnesium, aluminum, and silicon, and elongated talc 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.

635810-5A	No Asbestos Detected
635810-5B	No Asbestos Detected
635810-5C	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.

#### 635810-5A, Talc Particle



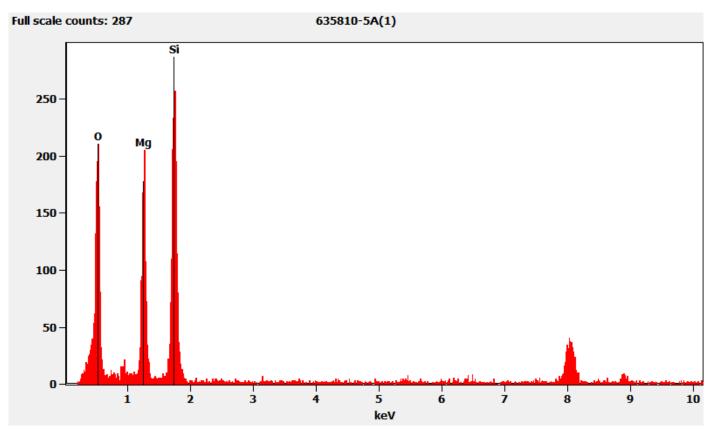
635810 FDA\_039.jpg 635810-5A Talc Particle Cal: 0.003702 μm/pix 18:57 5/16/2022 Microscopist<sup>(b)</sup> (6)

Camera: NAN T5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast 1 μm HV=100kV Direct Mag: 2900 x AMA Analytical Services, Inc

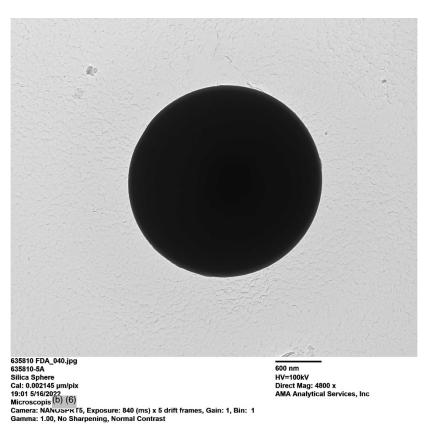
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



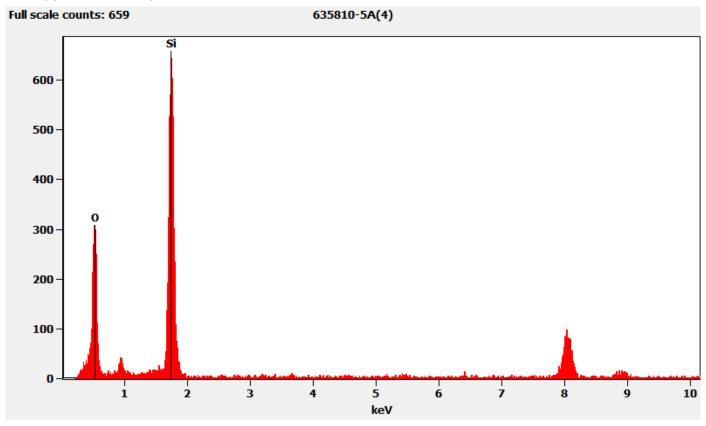
Chemistry from the Talc Particle Pictured Above



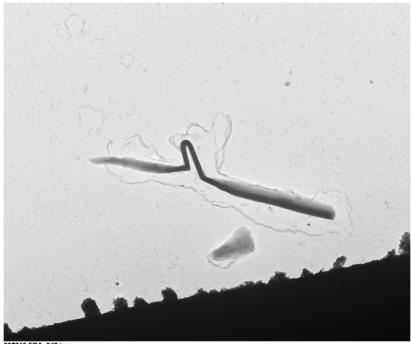
635810-5A, Silica Sphere



# Chemistry from the Silica Sphere Pictured Above



635810-5A, Talc Ribbon



635810 FDA\_042.jpg
635810-5A
Talc Ribbon
Cal: 0.002860 µm/pix
19:05 5/16/2022
Microscopist(b) (6)
Camera: NANUSFK 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

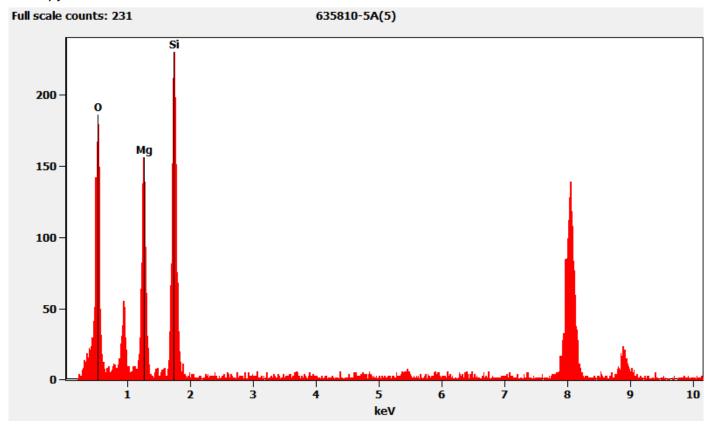
# Diffraction Pattern from the Talc Ribbon Pictured Above



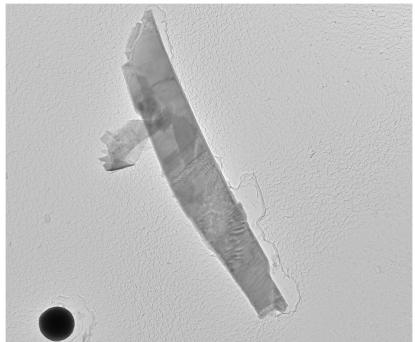
635810 FDA\_041.jpg 635810-5A Talc Ribbon 19:04 5/16/20(b) (6) Microscopis (b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

# Chemistry from the Talc Ribbon Pictured Above



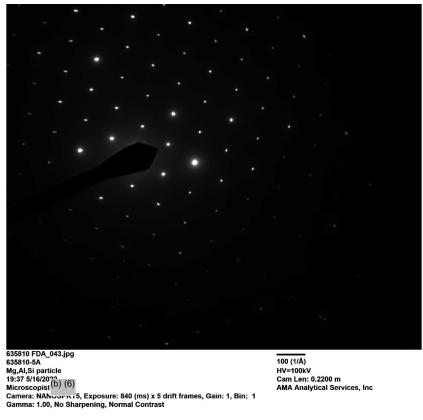
635810-5A, Elongated Particle Containing Magnesium, Aluminum, and Silicon



635810 FDA\_044.jpg 635810-5A Mg,Al,Si particle Cal: 0.003702 µm/pix 19:38 5/16/206 (6) Microscopisi Microscopisi Camera: NANUSP-RT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

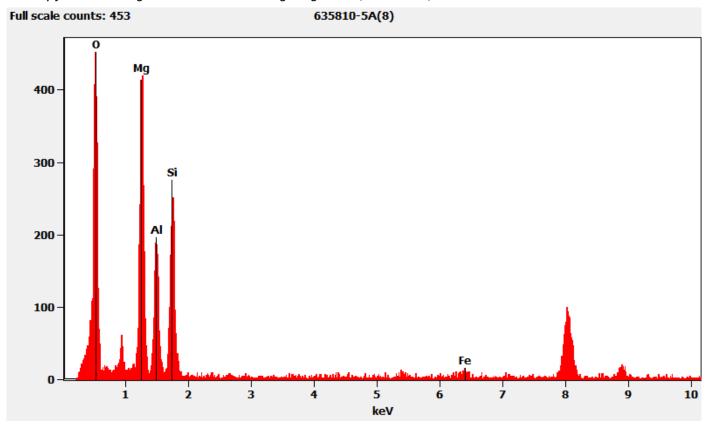
1 μm HV=100kV Direct Mag: 2900 x AMA Analytical Services, Inc

 $Hexagonal\ Diffraction\ Pattern\ from\ the\ Elongated\ Particle\ Containing\ Magnesium,\ Aluminum,\ and\ Silicon\ Pictured\ Above$ 

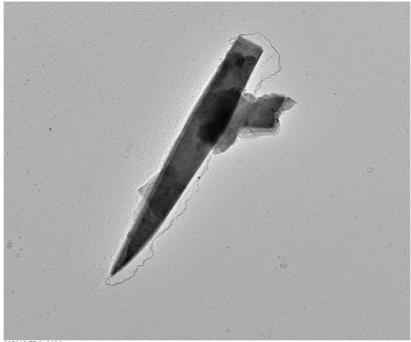


100 (1/Å) HV=100kV Cam Len: 0.2200 m AMA Analytical Services, Inc

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



635810-5A, Elongated Talc Particle



635810 FDA\_046.jpg 635810-5A Talc Fiber Cal: 0.003702 µm/pix 19:50 5/16/2000 (6) Microscopis (6) (6) Microscopis NAI 5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

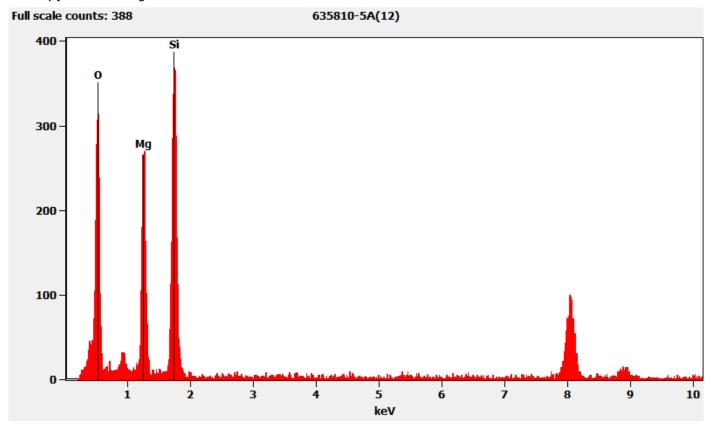
# Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



635810 FDA\_045.jpg 635810-5A Talc Fiber 19:49 5/16/2022 Microscopist (D) (6) Camera: NAN \_ ........ Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Chemistry from the Elongated Talc Particle Pictured Above



635810-6A, 6B, 6C/Client Sample: 03302022-6

#### PLM

All three aliquots of sample 03302022-6 were analyzed by (b) (6) on June 2, 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.

635810-6A	No Asbestos Detected
635810-6B	No Asbestos Detected
635810-6C	No Asbestos Detected

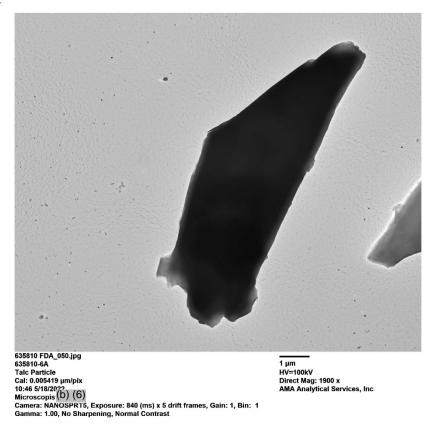
#### TEM

(b) (6) analyzed aliquot 6A on May 18, 2022, and aliquots 6B and 6C on May 19, 2022. The primary particle observed was talc; chromium particles and talc ribbons were also observed along with mica particles and elongated talc 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.

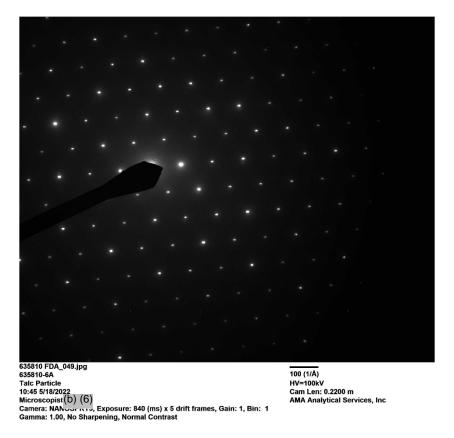
635810-6A	No Asbestos Detected
635810-6B	No Asbestos Detected
635810-6C	No Asbestos Detected

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.

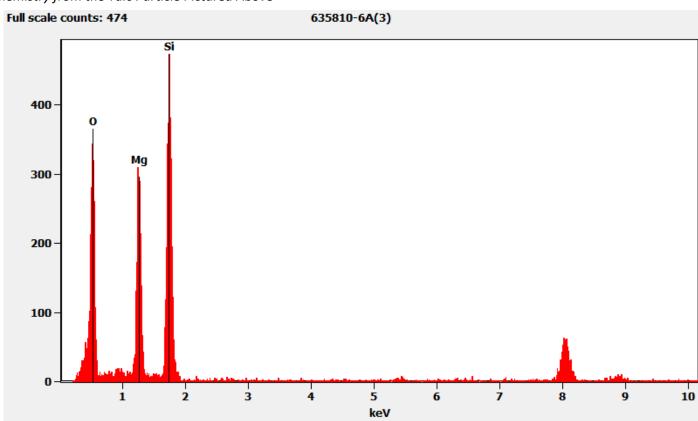
# 635810-6A, Talc Particle



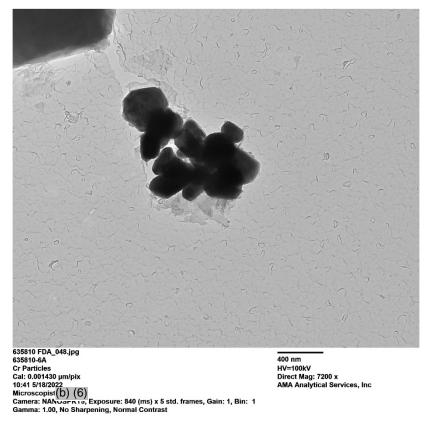
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



# Chemistry from the Talc Particle Pictured Above



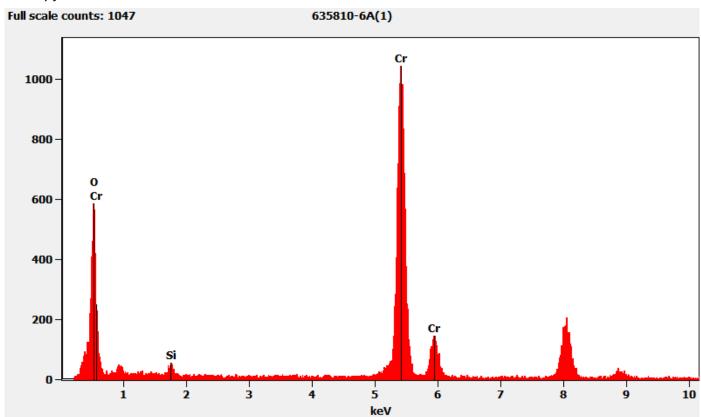
635810-6A, Chromium Particle



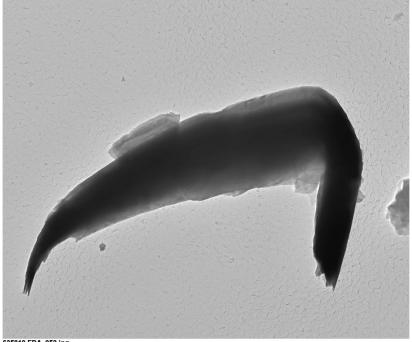
Diffraction Pattern from the Chromium Particle Pictured Above



# Chemistry from the Chromium Particle Pictured Above



# 635810-6A, Talc Ribbon



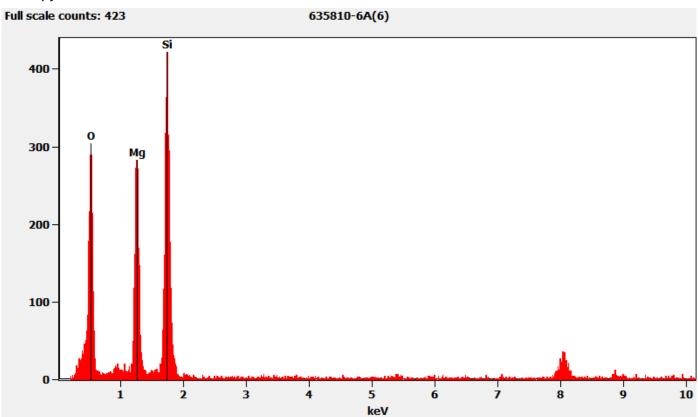
635810 FDA\_052.jpg 635810-6A Talc Ribbon Cal: 0.002860 µm/pix 10:58 5/18/20(6) (6) Microscopist Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

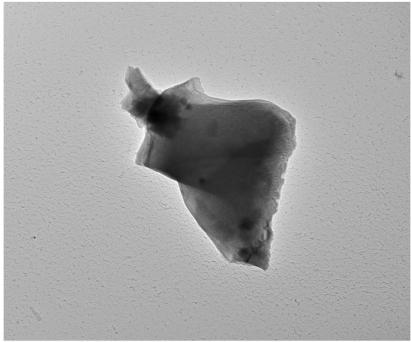
Diffraction Pattern from the Talc Ribbon Pictured Above



# Chemistry from the Talc Ribbon Pictured Above



# 635810-6C, Mica Particle

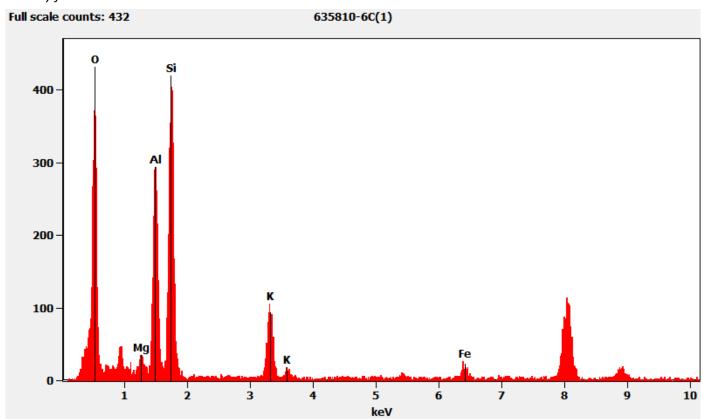


1 µm HV=100kV Direct Mag: 2900 x AMA Analytical Services, Inc

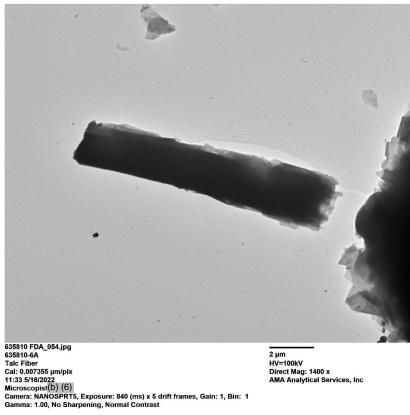
Hexagonal Diffraction Pattern from the Mica Particle Pictured Above



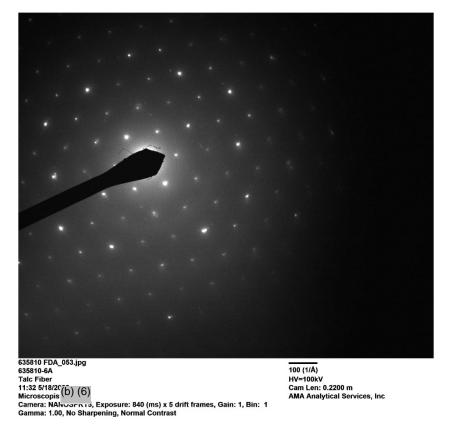
# Chemistry from the Mica Particle Pictured Above



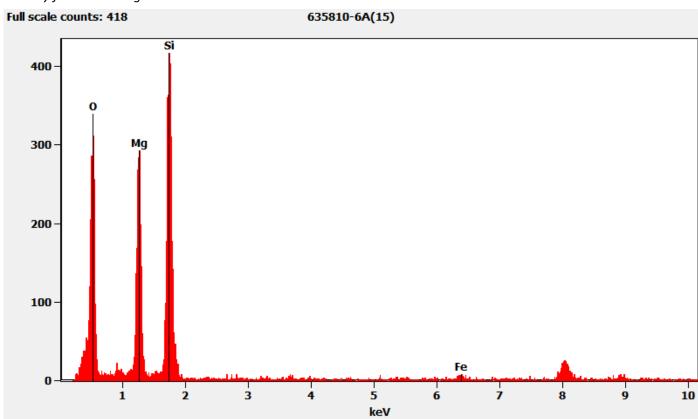
635810-6A, Elongated Talc Particle



Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



# Chemistry from the Elongated Talc Pictured Above



#### 635810-7A, 7B, 7C/Client Sample: 03302022-7

#### **PLM**

All three aliquots of sample 03302022-7 were analyzed by (b) (6) on June 2, 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.

635810-7A	No Asbestos Detected
635810-7B	No Asbestos Detected
635810-7C	No Asbestos Detected

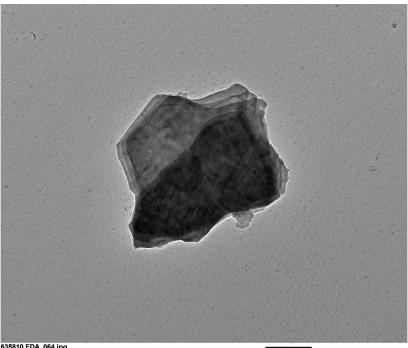
#### **TEM**

(b) (6) analyzed aliquots 7A and 7C on May 24, 2022, and aliquot 7B on May 23, 2022. The primary particle observed was talc; particles containing magnesium, aluminum, and silicon were also observed along with talc ribbons and elongated talc 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.

635810-7A	No Asbestos Detected
635810-7B	No Asbestos Detected
635810-7C	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.

#### 635810-7A, Talc Particle

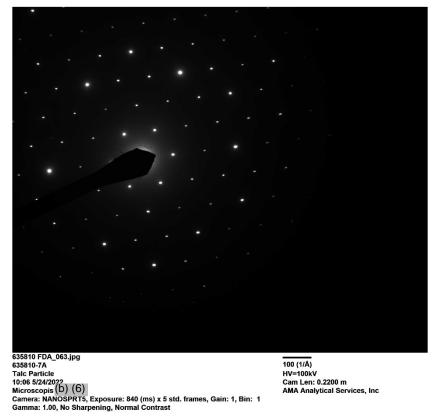


635810 FDA\_064.jpg 635810-7A Talc Particle Cal: 0.001775 μm/pix 10:07 5/24/2022 Microscopi:(D) (6)

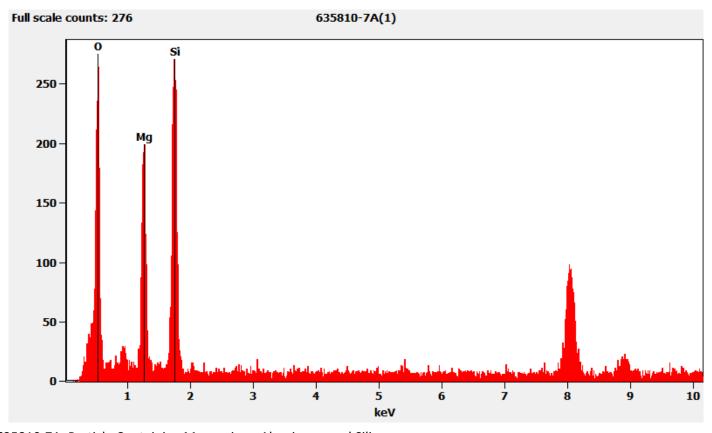
Microscopi(U) (U) Camera: NAw∪or⊷T5, Exposure: 840 (ms) x 5 std. frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

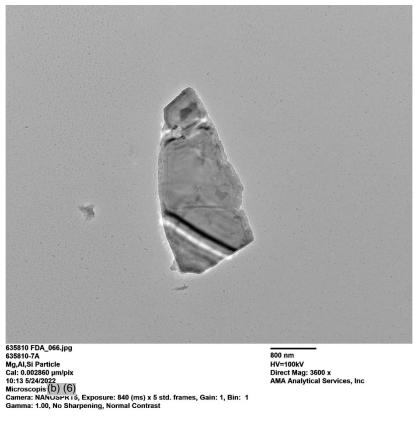
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



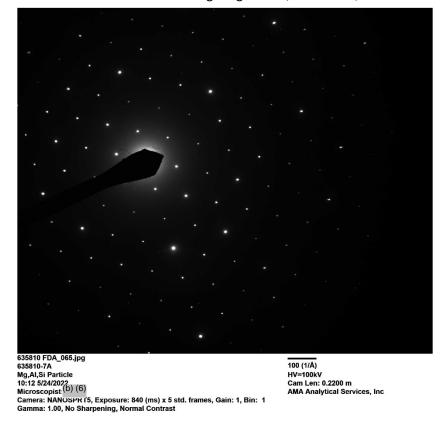
Chemistry from the Talc Particle Pictured Above



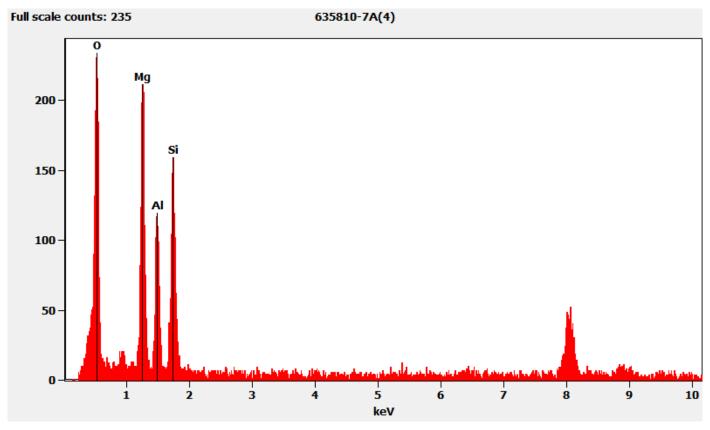
635810-7A, Particle Containing Magnesium, Aluminum, and Silicon



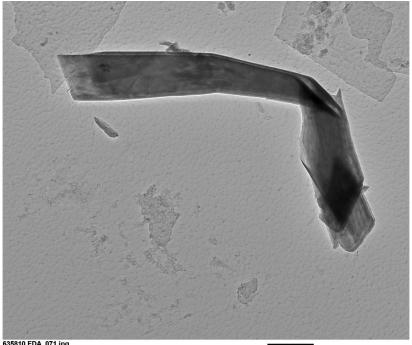
Hexagonal Diffraction Pattern from the Particle Containing Magnesium, Aluminum, and Silicon Pictured Above



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



635810-7A, Talc Ribbon



635810 FDA\_071.jpg
635810-7A
Talc Ribbon
Cal: 0.001775 μm/pix
12:07 5/24/2022
Microscopisi(b) (6)
Camera: NAI

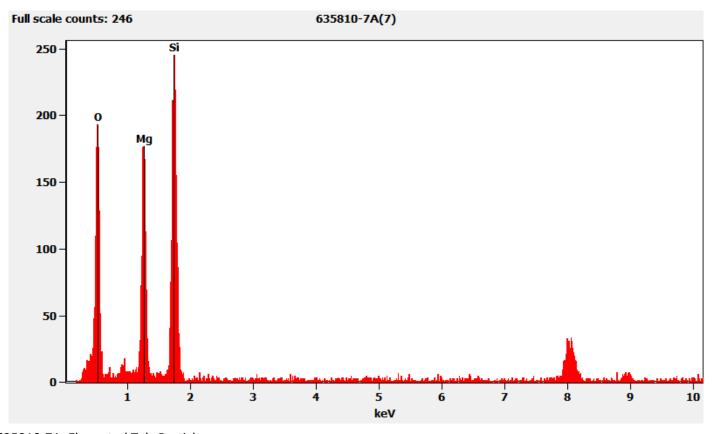
T5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

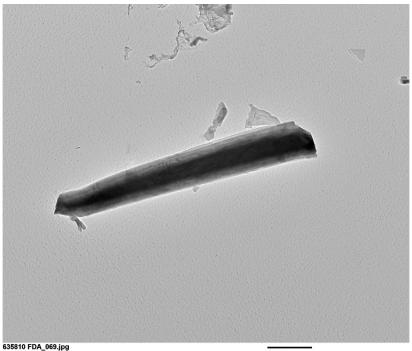
#### Diffraction Pattern from the Talc Ribbon Pictured Above



Chemistry from the Talc Ribbon Pictured Above



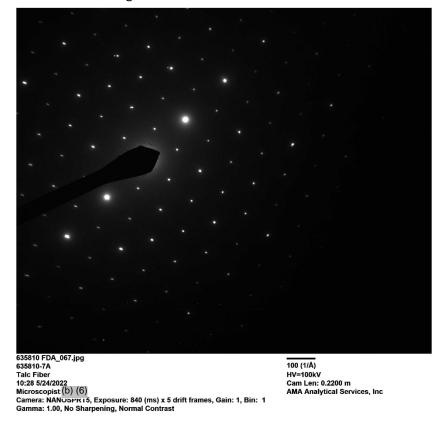
635810-7A, Elongated Talc Particle



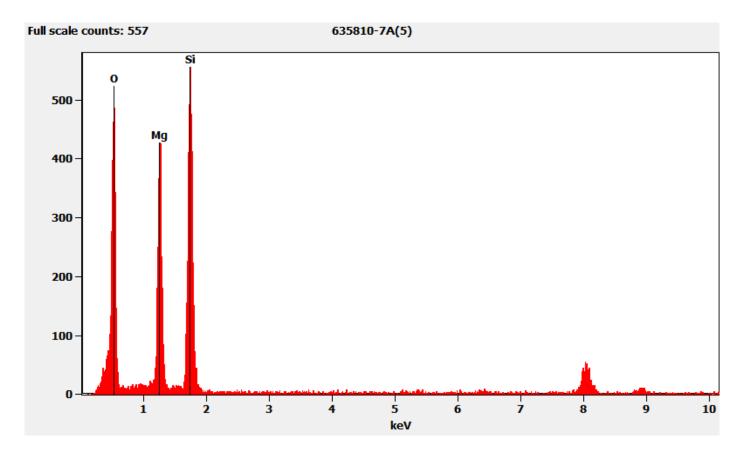
635810 FDA\_069.jpg 635810-7A Talc Fiber Cal: 0.003702 µm/pix 10:31 5/24/20(b) (6) Microscopis' Camera: NANUSPK 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



Chemistry from the Elongated Talc Particle Pictured Above



635810-8A, 8B, 8C/Client Sample: 03302022-8

PLM
All three aliquots of sample 03302022-8 were analyzed by (b) (6) on June 2, 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.

635810-8A No Asbestos Detected 635810-8B No Asbestos Detected 635810-8C No Asbestos Detected

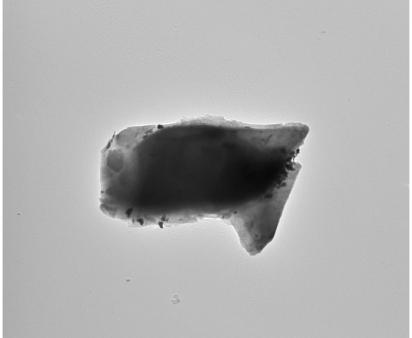
#### **TEM**

(b) (6) analyzed aliquots 8A and 8B on May 24, 2022. Andreas Saldivar analyzed aliquot 8C on May 25, 2022. The primary particles observed were talc, mica, and titanium; iron particles a were also observed along with talc ribbons and particles containing magnesium, aluminum, 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.

635810-8A	No Asbestos Detected
635810-8B	No Asbestos Detected
635810-8C	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.

## 635810-8A, Talc Particle



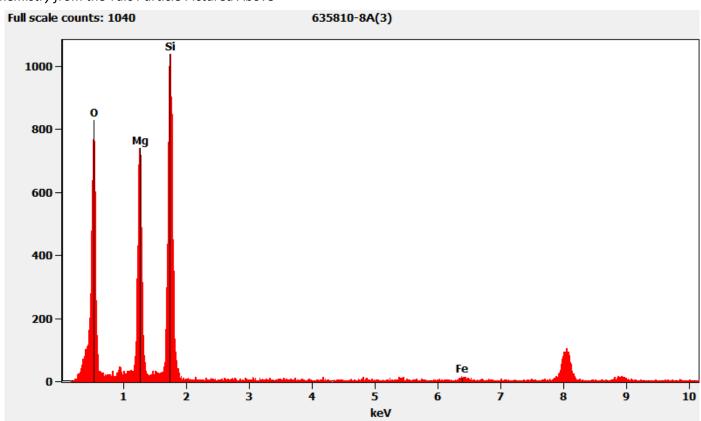
635810 FDA\_077.jpg 635810-8A Talc Particle Cal: 0.005419 µm/pix 12:31 5/24/2022 Microscopist (b) (6) Camera: NANบษาห เ 5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

1 μm HV=100kV Direct Mag: 1900 x AMA Analytical Services, Inc

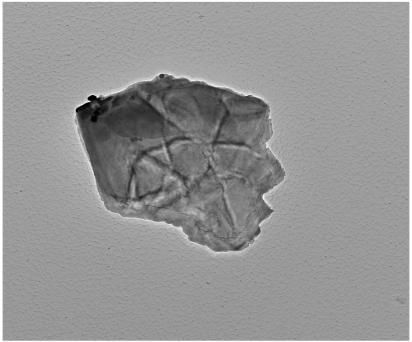
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



## Chemistry from the Talc Particle Pictured Above

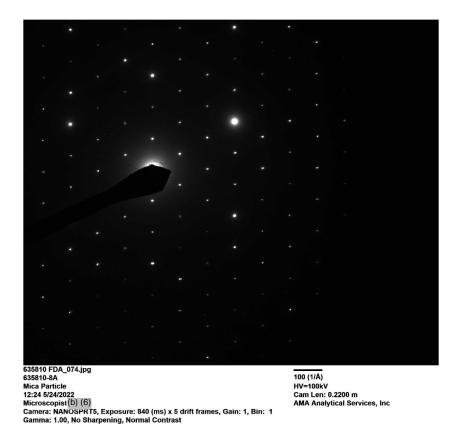


## 635810-8A, Mica Particle

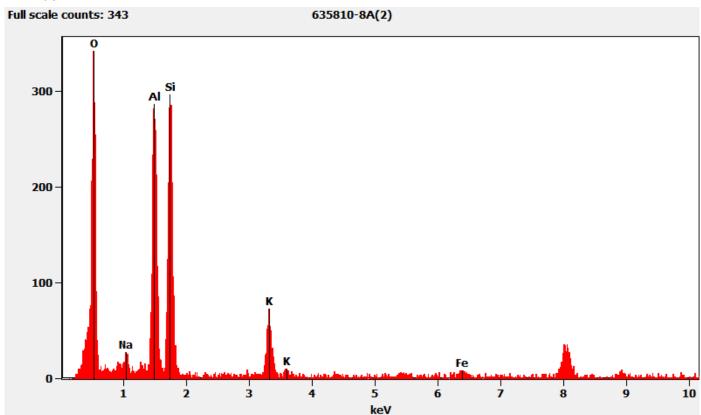


600 nm HV=100kV Direct Mag: 4800 x AMA Analytical Services, Inc

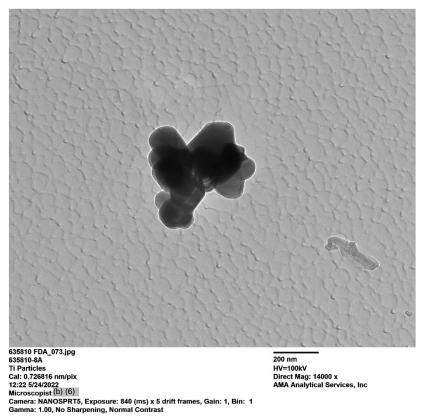
Hexagonal Diffraction Pattern from the Mica Particle Pictured Above



## Chemistry from the Mica Particle Pictured Above



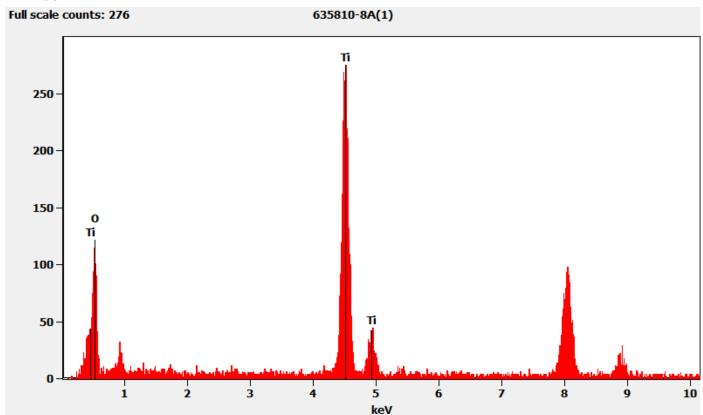
## 635810-8A, Titanium Particles



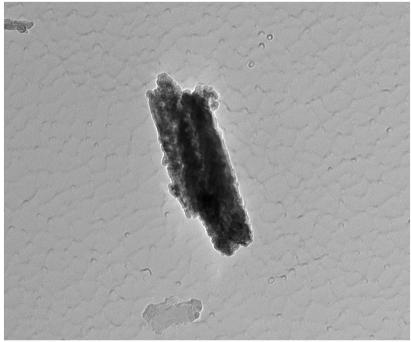
Diffraction Pattern from the Titanium Particles Pictured Above



## Chemistry from the Titanium Particle Pictured Above



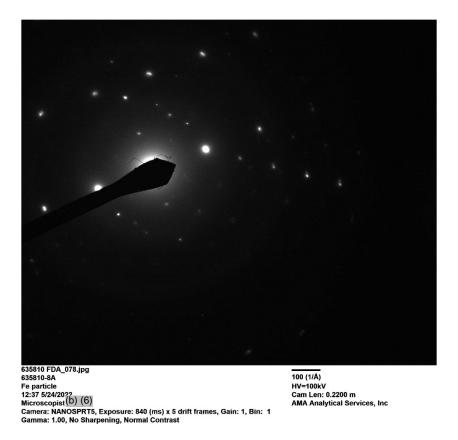
## 635810-8A, Iron Particle



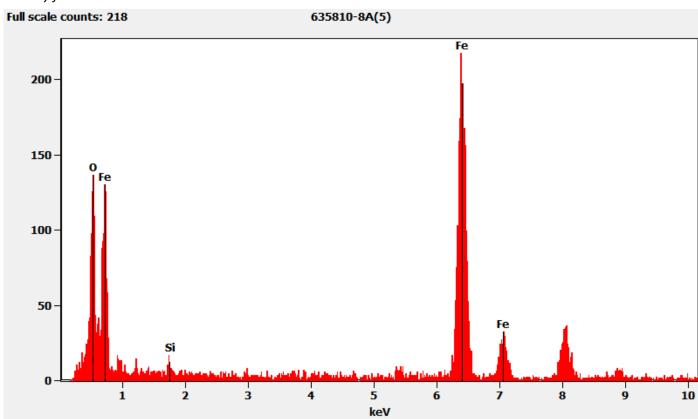
635810 FDA\_079.jpg 635810-8A Fe particle Cal: 0.571351 nm/pix 12:38 5/24/2022 Microscopist (b) (6) Camera: NANUSPK 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

100 nm HV=100kV Direct Mag: 19000 x AMA Analytical Services, Inc

Diffraction Pattern from the Iron Particle Pictured Above



## Chemistry from the Iron Particle Pictured Above



## 635810-8A, Talc Ribbon



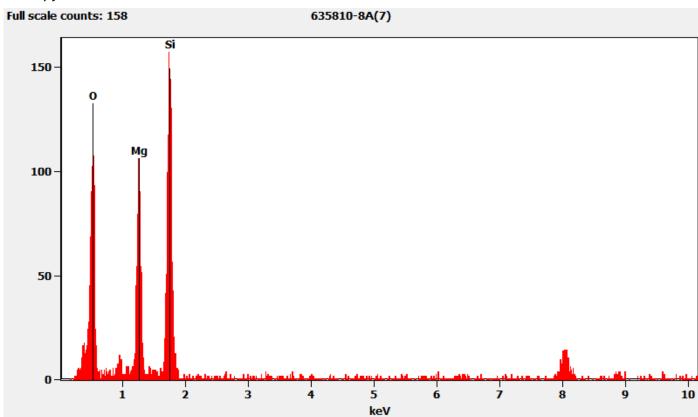
835810 FDA\_081,jpg 635810-8A Talc Ribbon Cal: 0.001430 µm/pix 12:56 5/24/2000 (6) Microscopis (b) (6) Camera: NANUSHK 13, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

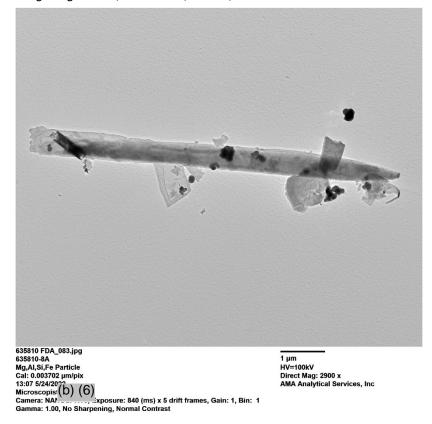
Diffraction Pattern from the Talc Ribbon Pictured Above



## Chemistry from the Talc Ribbon Pictured Above



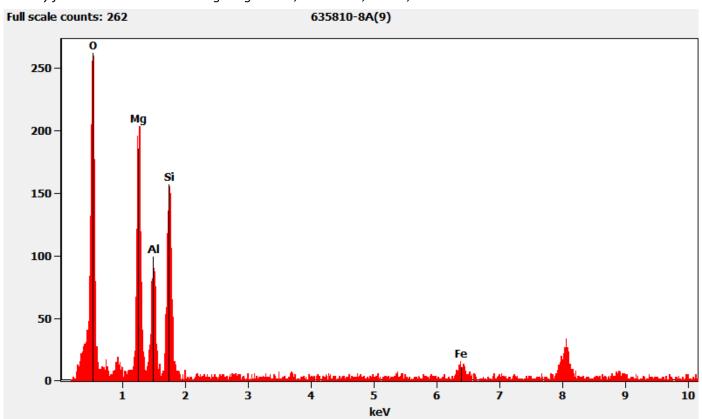
635810-8A, Particle Containing Magnesium, Aluminum, Silicon, and Iron



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



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



#### 635810-9A, 9B, 9C/Client Sample: 03302022-9

#### **PLM**

All three aliquots of sample 03302022-9 were analyzed by (b) (6) on June 2, 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.

635810-9A	No Asbestos Detected
635810-9B	No Asbestos Detected
635810-9C	No Asbestos Detected

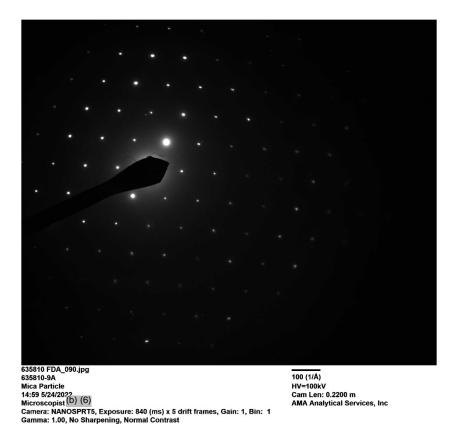
#### **TEM**

(b) (6) analyzed aliquot 9A on May 24, 2022, through May 25, 2022, aliquot 9B on May 25, 2022, and aliquot 9C on May 26, 2022. The primary particles observed were mica and particles containing aluminum and silicon; talc particles were also observed along with particles containing magnesium, aluminum, silicon, and iron, particles containing sodium, aluminum, and silicon, and silicon 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.

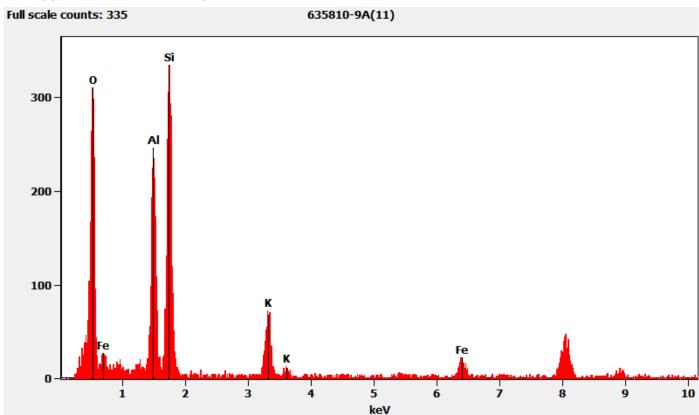
635810-9A	No Asbestos Detected
635810-9B	No Asbestos Detected
635810-9C	No Asbestos Detected

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.

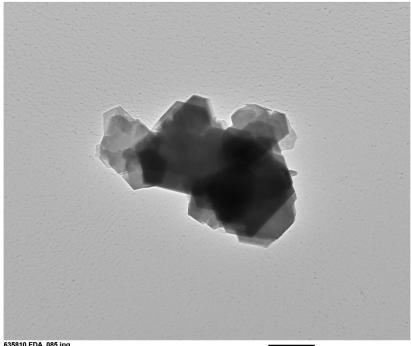
635810-9A Hexagonal Diffraction a Mica Particle



## Chemistry from the Mica Particle Referenced Above



635810-9A, Particle Containing Aluminum and Silicon



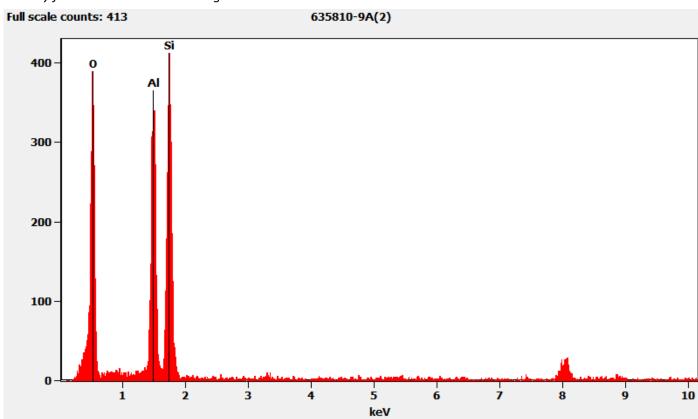
635810 FDA\_085.jpg
635810-9A
Al,Si particle
Cai: 0.001775 µm/pix
14:32 5/24/2022
Microscopis (b) (6)
Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

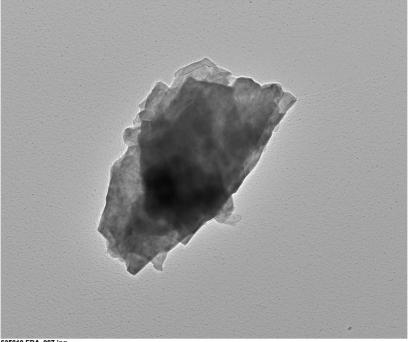
Diffraction Pattern from the Particle Containing Aluminum and Silicon Pictured Above



Chemistry from the Particle Containing Aluminum and Silicon Pictured Above



## 635810-9A, Talc Particle



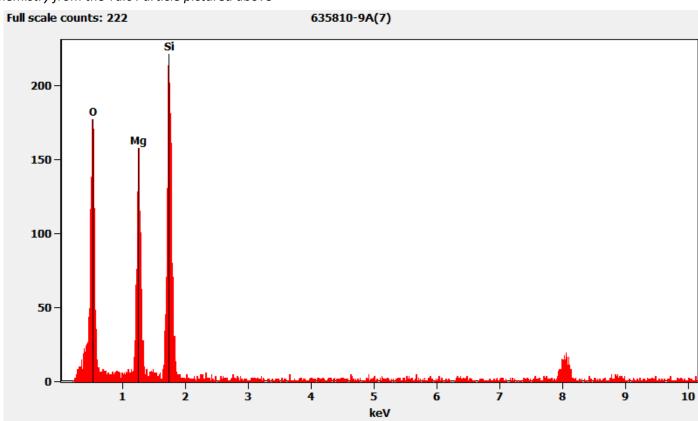
635810 FDA\_087.jpg 635810-9A Talc Particle Cal: 0.002860 µm/pix 14:39 5/24/22(\$\hat{0}\$) (6) Microscopis Camera: NANUSPKT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

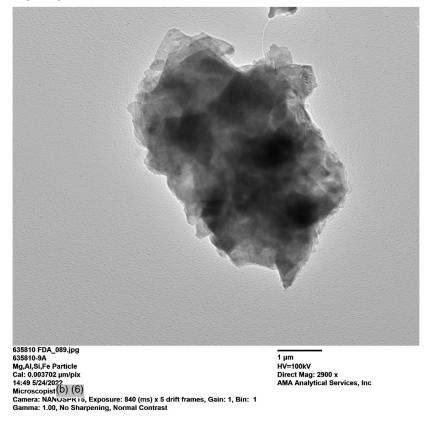
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



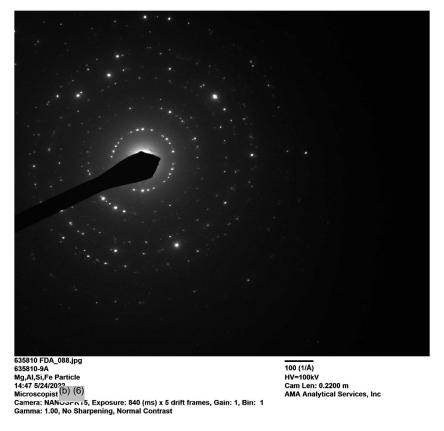
## Chemistry from the Talc Particle pictured above



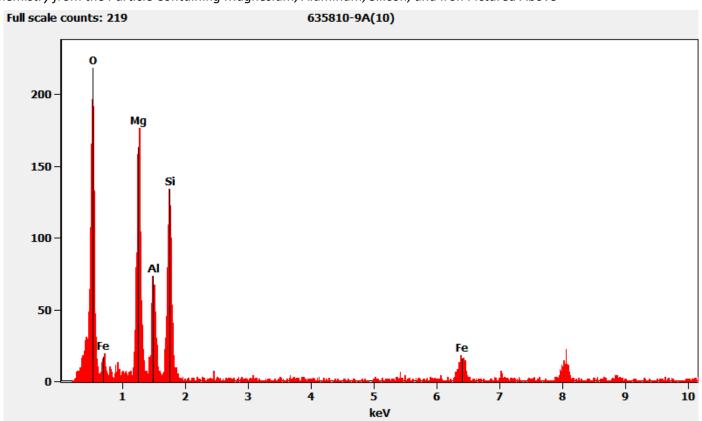
35810-9A, Particle Containing Magnesium, Aluminum, Silicon, and Iron



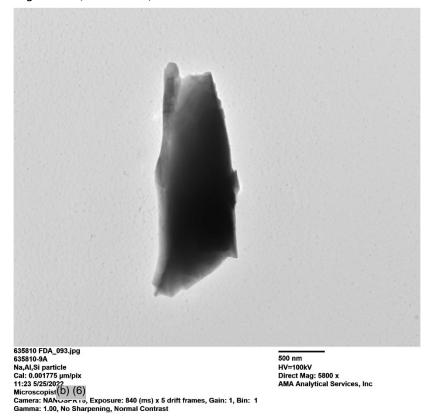
Diffraction Pattern from the Particle Containing Magnesium, Aluminum, Silicon, and Iron Pictured Above



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



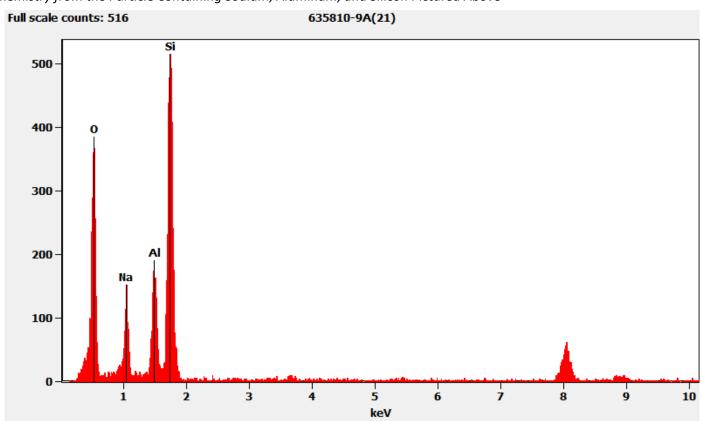
35810-9A, Particle Containing Sodium, Aluminum, and Silicon



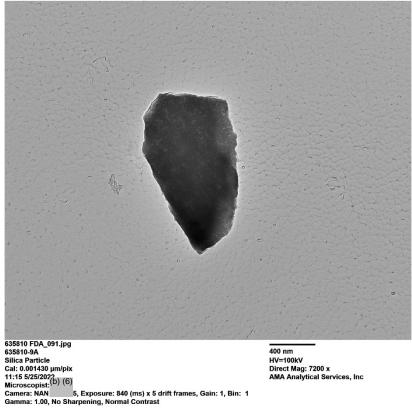
Diffraction Pattern from the Particle Containing Sodium, Aluminum, and Silicon Pictured Above



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

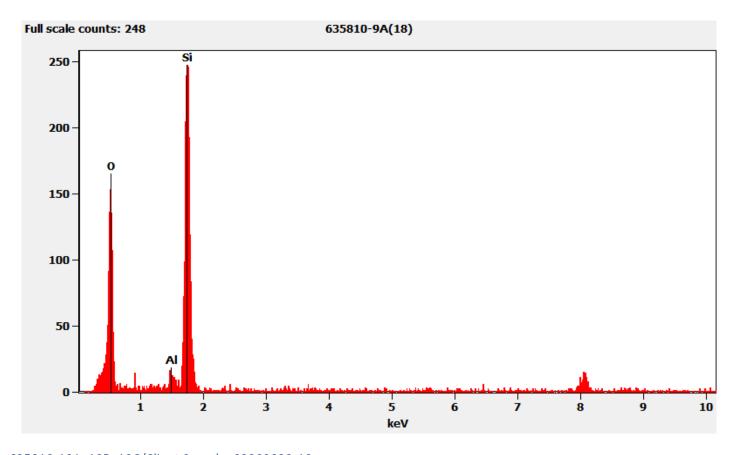


## 635810-9A, Silicon Particle



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

Chemistry from the Silicon Particle pictured above



635810-10A, 10B, 10C/Client Sample: 03302022-10

# PLM All three aliquots of sample 03302022-10 were analyzed by (b) (6) on June 2, 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.

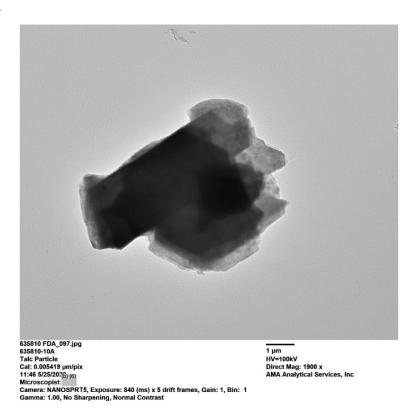
635810-10A No Asbestos Detected 635810-10B No Asbestos Detected 635810-10C No Asbestos Detected

#### **TEM**

(b) (6) analyzed aliquot 10A on May 25, 2022. Andreas Saldivar analyzed aliquots 10B and 10C on May 31, 2022. The primary particle observed was talc; mica particles with titanium and silicon particles were also observed along with particles containing magnesium, aluminum, silicon, and iron, calcium particles, iron particles, particles containing nitrogen, oxygen, silicon, phosphorus, sulfur, and calcium, talc ribbons, and elongated talc 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.

635810-10A No Asbestos Detected 635810-10B No Asbestos Detected 635810-10C 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

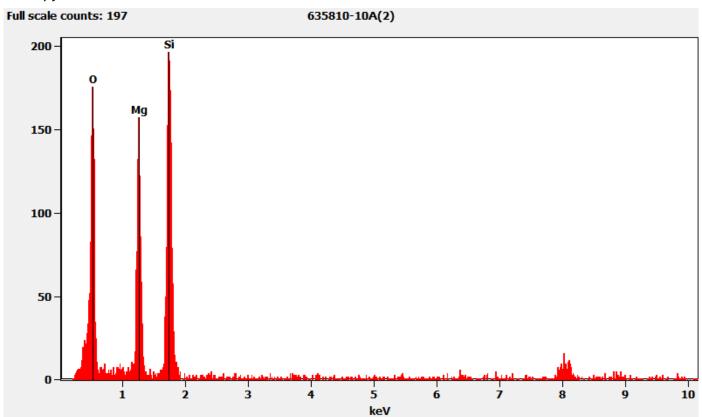
## 635810-10A, Talc Particle



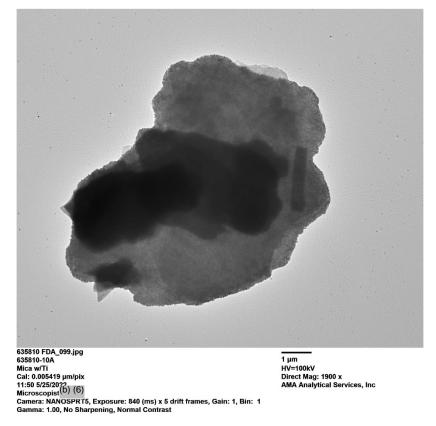
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



## Chemistry from the Talc Particle Pictured Above



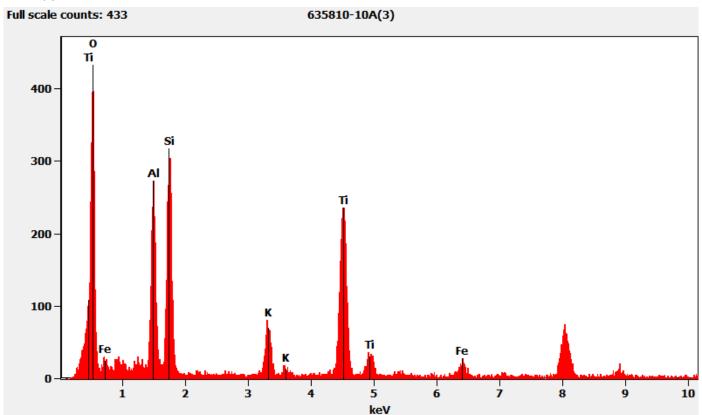
635810-10A, Mica Particle with Titanium



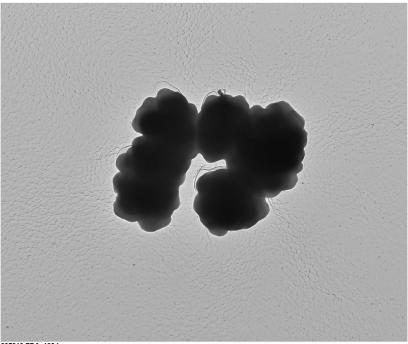
Diffraction Pattern from the Mica Particle with Titanium Pictured Above



Chemistry from the Mica Particle with Titanium Pictured Above



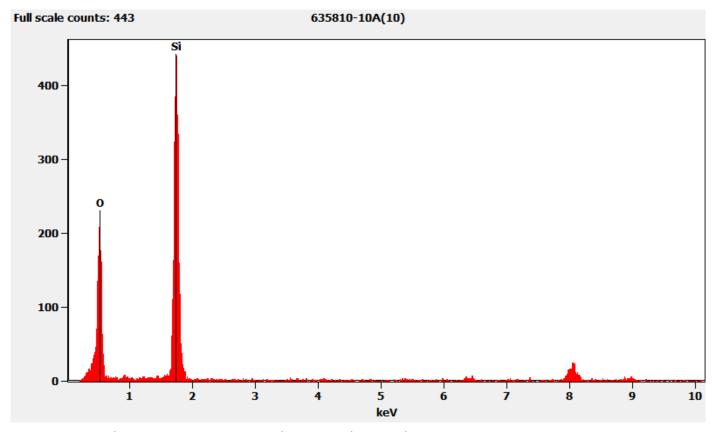
## 635810-10B, Silicon Particles



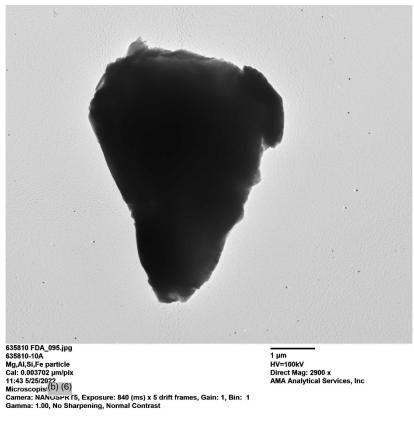
635810 FDA\_102.jpg 635810-10A Silica particles Cal: 0.002145 µm/pix 12:35 5/25/2022 Microscopist(b) (6) Camera: NANUSPK ts, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Chemistry from the Silicon Particles Pictured Above



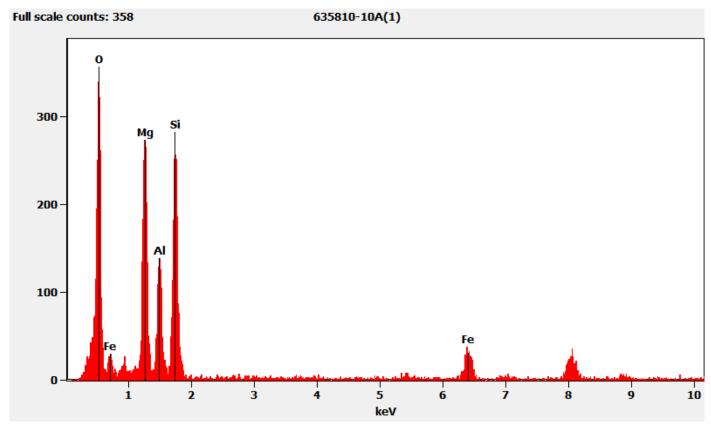
635810-10A, Particle Containing Magnesium, Aluminum, Silicon, and Iron



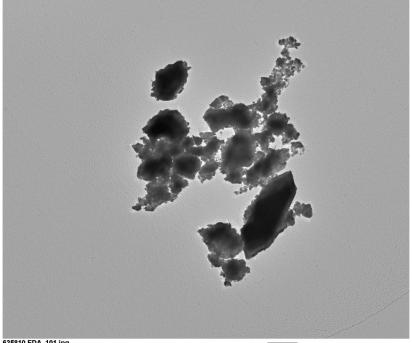
Diffraction Pattern from the Particle Containing Magnesium, Aluminum, Silicon, and Iron Pictured Above



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



635810-10A, Calcium Particles



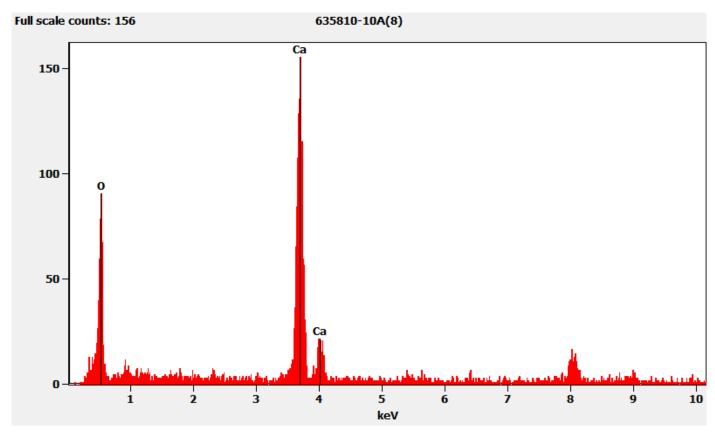
635810 FDA\_101.jpg 635810-10A Ca particle Cal: 0.005419 µm/pix 12:13 5/25/2020 Microscopis(b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

1 µm HV=100kV Direct Mag: 1900 x AMA Analytical Services, Inc

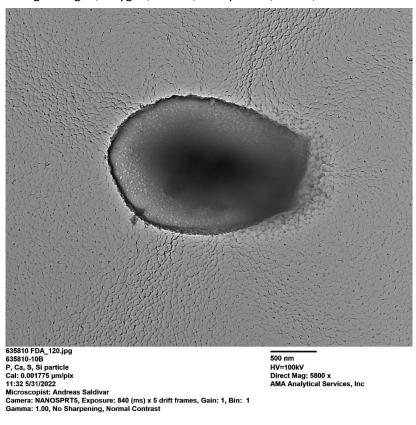
Diffraction Pattern from the Calcium Particles Pictured Above



Chemistry from the Calcium Particles Pictured Above

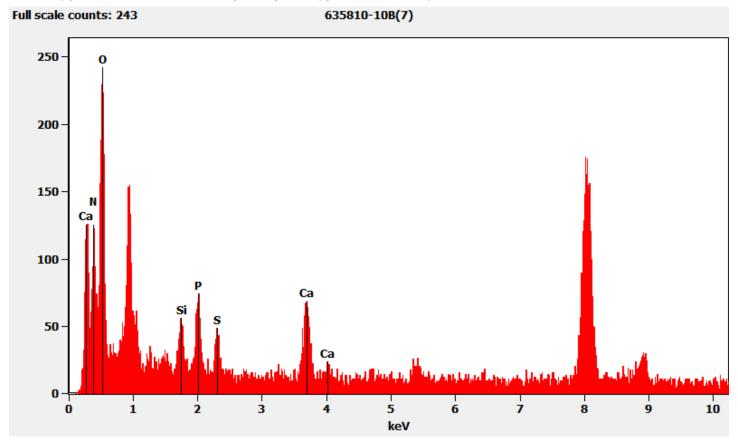


635810-10B, Particle Containing Nitrogen, Oxygen, Silicon, Phosphorus, Sulfur, and Calcium

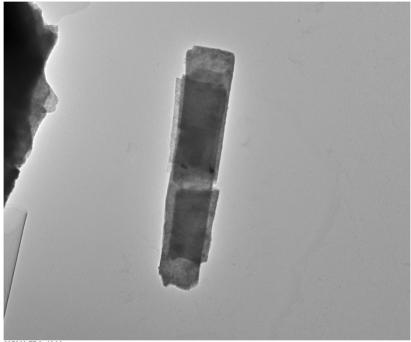


500 nm HV=100kV Direct Mag: 5800 x AMA Analytical Services, Inc

Chemistry from the Particle Containing Nitrogen, Oxygen, Silicon, Phosphorus, Sulfur, and Calcium Pictured Above



635810-10A, Elongated Talc Particle



635810 FDA\_104.jpg 635810-10A Talc Fiber Cal: 0.007355 µm/pix 12:55 5/25/2022 Microscopis (b) (6) Camera: NA! ......T5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

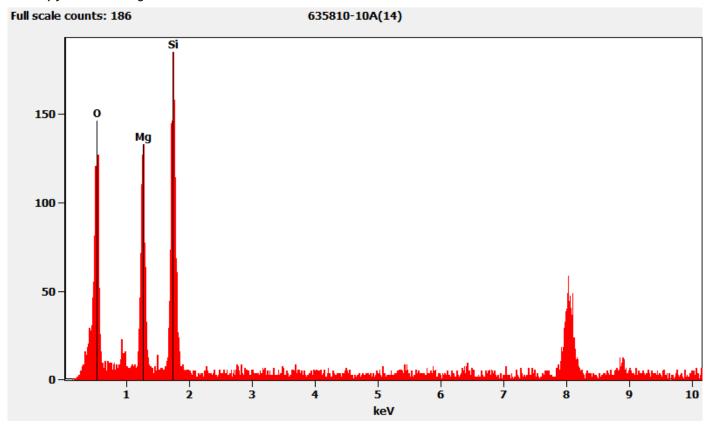
2 μm HV=100kV Direct Mag: 1400 x AMA Analytical Services, Inc

# Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



635810 FDA\_103.jpg 635810-10A Talc Fiber 12:54 5/25/2022 Microscopist(b) (6) Camera: NAN 5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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



635810-11A, 11B, 11C/Client Sample: 03302022-11

### PLM

All three aliquots of sample 03302022-11 were analyzed by (b) (6) on June 2, 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.

635810-11A	No Asbestos Detected
635810-11B	No Asbestos Detected
635810-11C	No Asbestos Detected

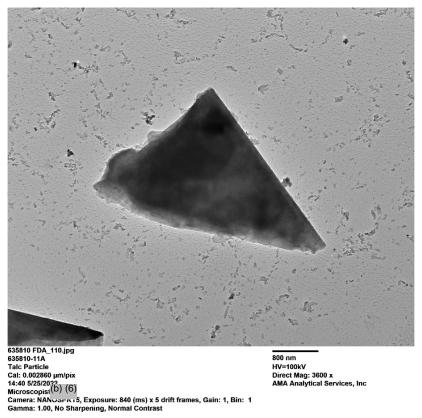
### TEM

(b) (6) analyzed aliquot 11A on May 25, 2022, and aliquots 11B and 11C on May 26, 2022. The primary particles observed were talc, mica, and iron; silicon particles were also observed along with particles containing sodium, aluminum, and silicon, titanium particles, talc ribbons, and elongated talc 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.

635810-11A	No Asbestos Detected
635810-11B	No Asbestos Detected
635810-11C	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

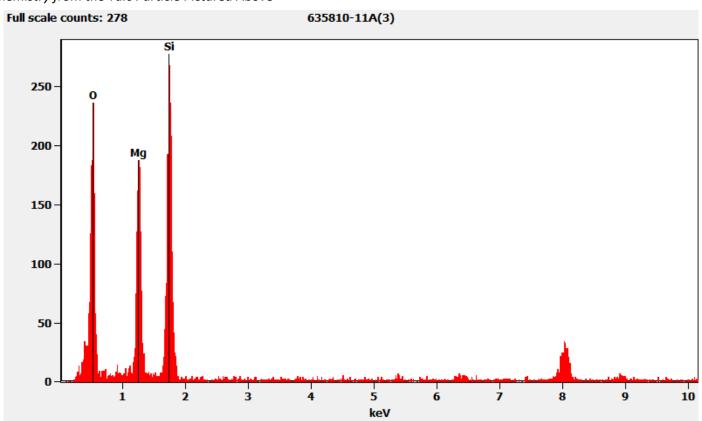
### 635810-11A, Talc Particle



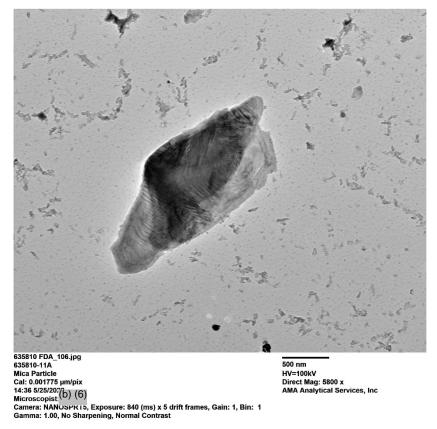
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



## Chemistry from the Talc Particle Pictured Above



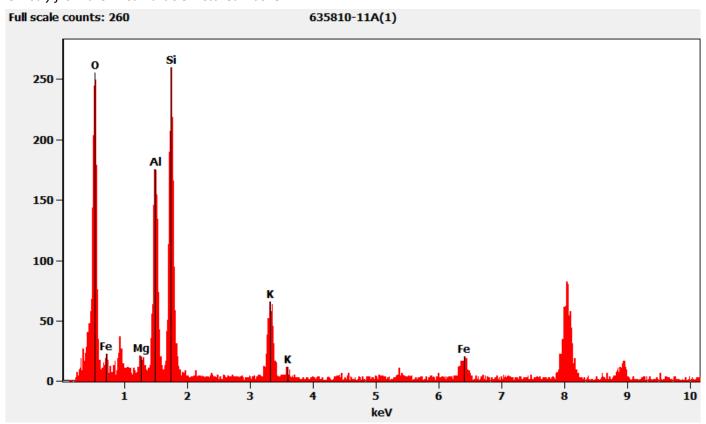
## 635810-11A, Mica Particle



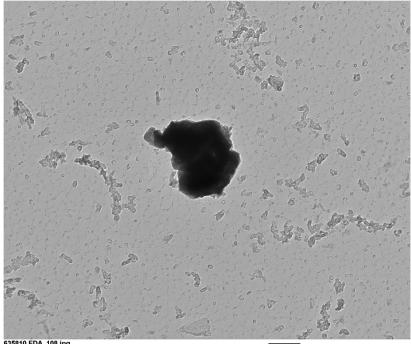
Hexagonal Diffraction Pattern from the Mica Particle Pictured Above



Chemistry from the Mica Particle Pictured Above



635810-11A, Iron Particle



635810 FDA\_108.jpg 635810-11A Fe Particle Cal: 0.001030 µm/pix 14:37 5/25/20?2 Microscopis (b) (6) Camera: NANUSPK 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

200 nm HV=100kV Direct Mag: 10000 x AMA Analytical Services, Inc

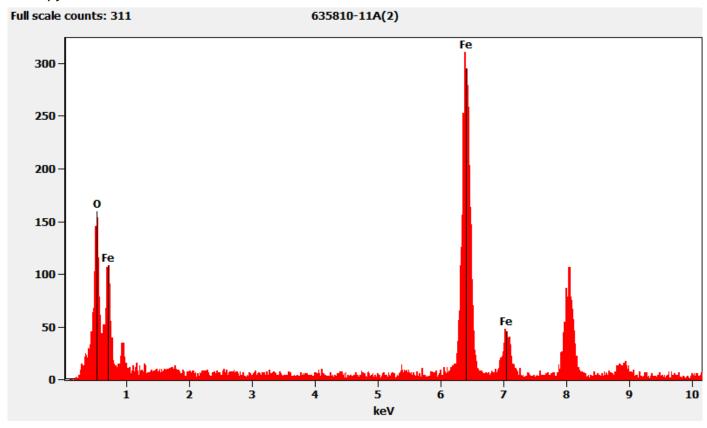
# Diffraction Pattern from the Iron Particle Pictured Above



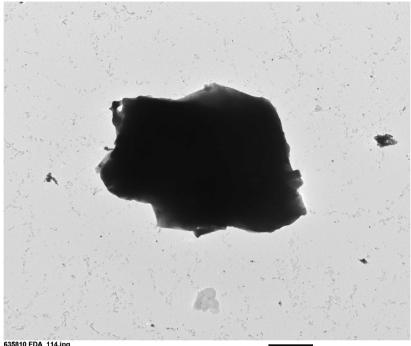
635810 FDA\_107.jpg 635810-11A Fe Particle 14:36 5/25/2022 Microscopist: (b) (6) Microscopist: (b) (6) Camera: NANJSFRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

# Chemistry from the Iron Particle Pictured Above



635810-11A, Silicon Particle



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

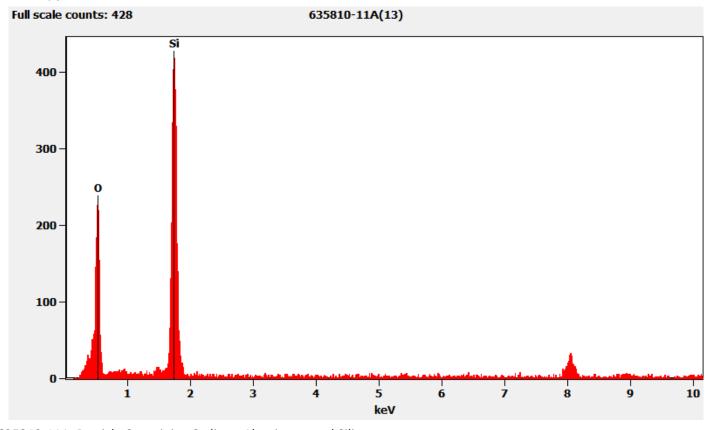
## Diffraction Pattern from the Silicon Particle Pictured Above



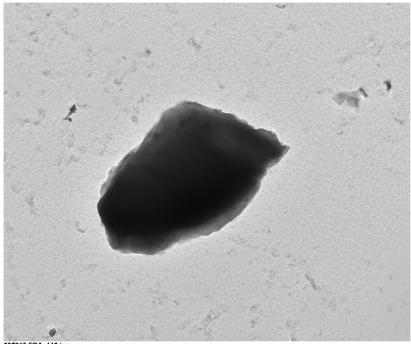
635810 FDA\_113.jpg 635810-11A Silica particle 16:50 5/25/203(b) (6) Microscopist Camera: NAN\_\_\_\_\_\_5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

# Chemistry from the Silicon Particle Pictured Above



635810-11A, Particle Containing Sodium, Aluminum, and Silicon



635810 FDA\_112.jpg 635810-11A Na,Al,Si Particle Cal: 0.002145 µm/pix 14:45 5/25/2022 Microscopis(<sup>()</sup>D (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

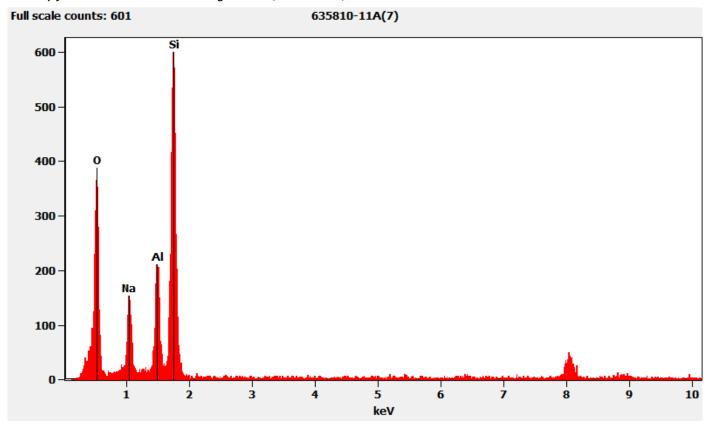
## Diffraction Pattern from the Particle Containing Sodium, Aluminum, and Silicon Pictured Above



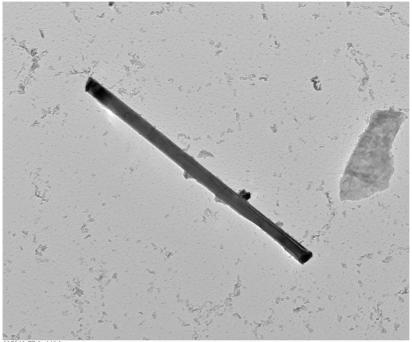
635810 FDA\_111.jpg 635810-11A Na,Al,Si Particle 14:44 5/25/2022 Microscopist: (b) (6) Camera: NAN-on n 15, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

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



635810-11B, Elongated Titanium Particle



635810 FDA\_118.jpg 635810-11B TI Fiber Cal: 0.002145 µm/pix 15:42 5/26/2022 Microscopist(b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

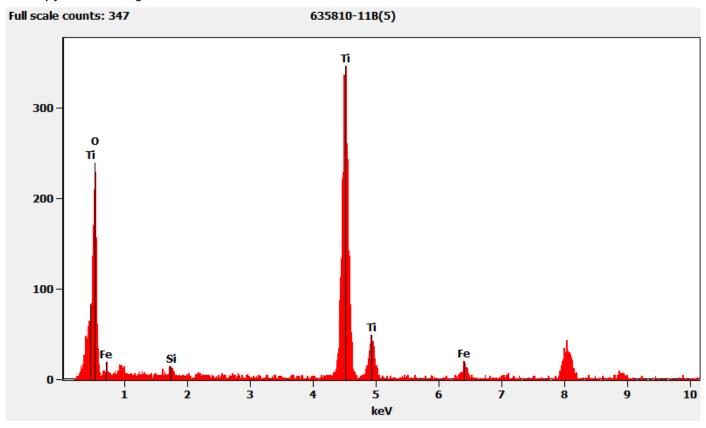
## Diffraction Pattern from the Elongated Titanium Particle Pictured Above



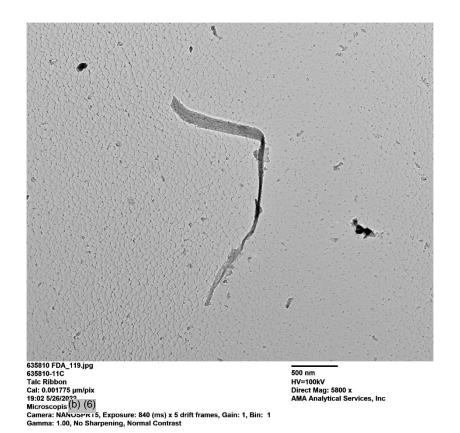
635810 FDA\_117.jpg 635810-11B Ti Fiber 15:40 5/26/2027 Microscopist: (b) (6) Camera: NANบราหา เร, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

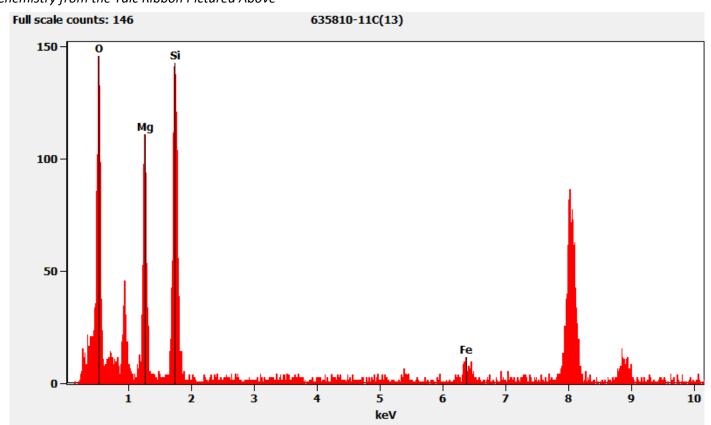
# Chemistry from the Elongated Titanium Particle Pictured Above



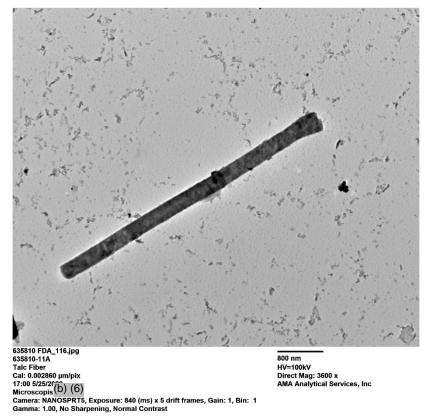
635810-11C, Talc Ribbon



Chemistry from the Talc Ribbon Pictured Above



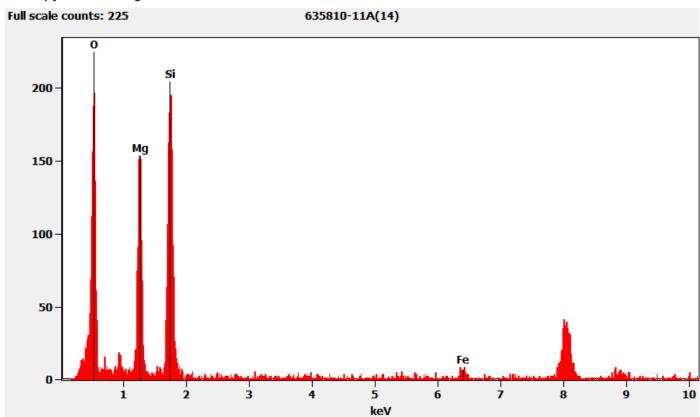
635810-11A, Elongated Talc Particle



Hexagonal Diffraction Pattern from the Elongated Talc Particle Pictured Above



Chemistry from the Elongated Talc Particle Pictured Above



### 635810-12A, 12B, 12C/03302022-12.1, 12.3, 12.5 (PLM) & 12.2, 12.4, 12.6 (TEM)

### **PLM**

Aliquots 03302022-12.1, 12.3, and 12.3 were analyzed by (b) (6) on June 2, 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.

635810-12A	No Asbestos Detected
635810-12B	No Asbestos Detected
635810-12C	No Asbestos Detected

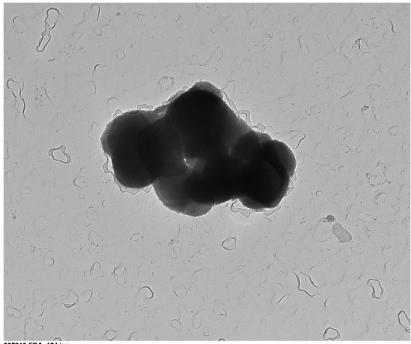
### **TEM**

(b) (6) analyzed aliquot 12A (12.2) on May 31, 2022. Andreas Saldivar analyzed aliquots 12B (12.4) and 12C (12.6) on May 31, 2022. The primary particles observed were titanium and particles containing silicon and iron; talc particles were also observed along with particles containing sodium, aluminum, and silicon. No asbestos or non-asbestos amphibole variants were observed during analysis. The results were calculated using the equations detailed in the *Calculations* section above.

635810-12A	No Asbestos Detected
635810-12B	No Asbestos Detected
635810-12C	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

635810-12A, Titanium Particle



635810 FDA\_124.jpg 635810-12A Ti particle Cal: 0.728816 nm/pix 13:54 5/31/2023 Microscopis (b) (6) Camera: NA 5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

200 nm HV=100kV Direct Mag: 14000 x AMA Analytical Services, Inc

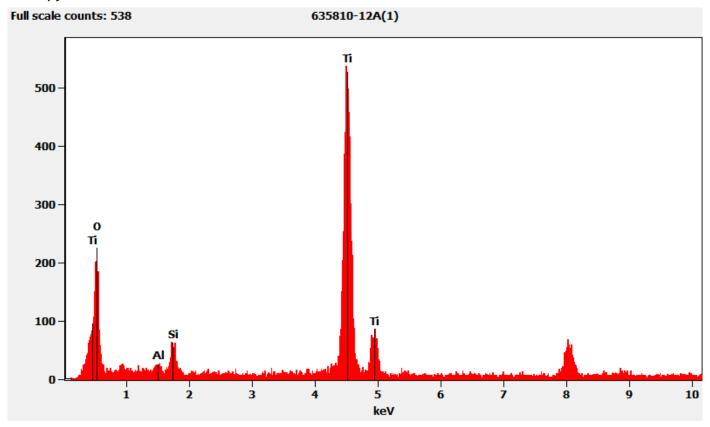
# Diffraction Pattern from the Titanium Particle Pictured Above



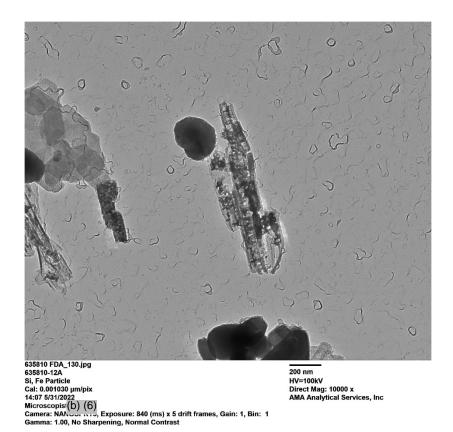
635810 FDA\_123.jpg 635810-12A Ti particle 13:53 5/31/2022 Microscopisi(b) (6) Microscopisi(b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

# Chemistry from the Titanium Particle Pictured Above



635810-12A, Particle Containing Silicon and Iron



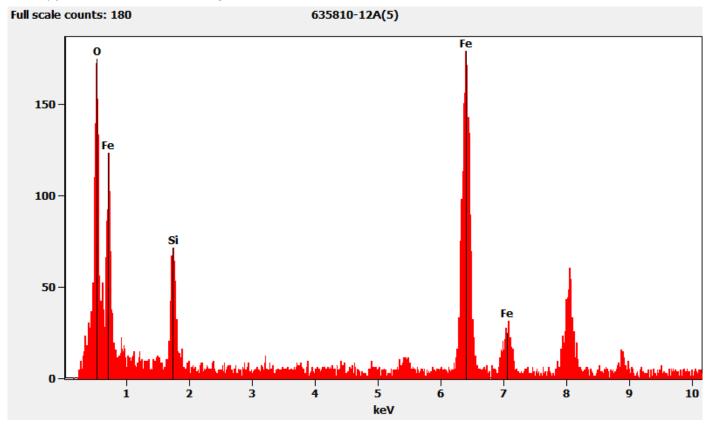
# Diffraction Pattern from the Particle Containing Silicon and Iron Pictured Above



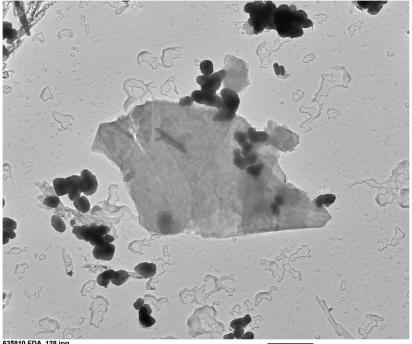
635810 FDA\_129.jpg 635810-12A Si, Fe Particle 14:06 5/31/2022 Microscopis (D) (6) Microscopis (D) (E) Camera: NANUSPRIS, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Chemistry from the Particle Containing Silicon and Iron Pictured Above



635810-12A, Talc Particle



635810 FDA\_128,jpg 635810-12A Talc Particle Cal: 0.002860 µm/pix 14:05 5/31/2022 Microscopist (b) (6) Camera: NANOSENTS, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

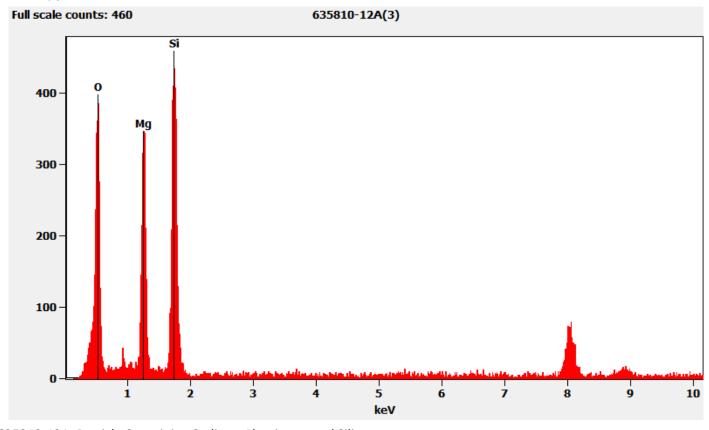
## Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



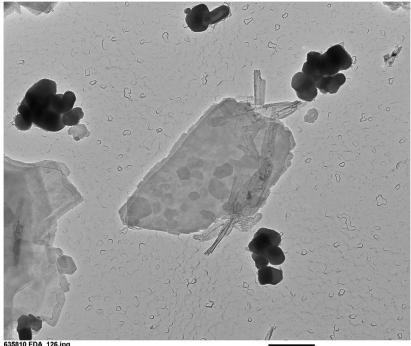
635810 FDA\_127.jpg 635810-12A Talc Particle 14:01 5/31/2022 Microscopis (b) (6) Camera: NANUGER 1.0, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

# Chemistry from the Talc Particle Pictured Above



635810-12A, Particle Containing Sodium, Aluminum, and Silicon



635810 FDA\_126.jpg
635810-12A
Na,Al,Si particle
Cat: 0.001775 µm/pix
13:59 5/31/2022
Microscopist: (b) (6)
Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

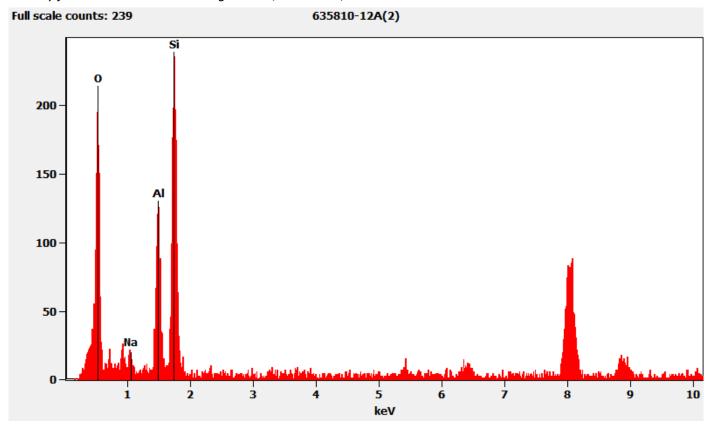
Diffraction Pattern from the Particle Containing Sodium, Aluminum, and Silicon Pictured Above



635810 FDA\_125.jpg 635810-12A Na,Al,Si particle 13:58 5/31/2022 Microscopist (b) (6) Camera: NAN∪SFR I S, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

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



### 635810-13A, 13B, 13B/03302022-13.1, 13.3, 13.5 (PLM) & 13.2, 13.4, 13.6 (TEM)

### PLM

Aliquots 03302022-13.1, 13.3, and 13.3 were analyzed by (b) (6) on June 2, 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.

635810-13A	No Asbestos Detected
635810-13B	No Asbestos Detected
635810-13C	No Asbestos Detected

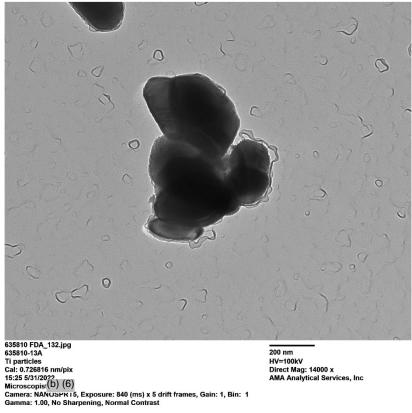
### **TEM**

(b) (6) analyzed aliquots 13A (13.2), 13B (13.4), and 13C (13.6) on May 31, 2022. The primary particles observed were titanium and particles containing silicon and iron; talc particles were also observed along with particles containing aluminum and silicon, 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.

635810-13A	No Asbestos Detected
635810-13B	No Asbestos Detected
635810-13C	No Asbestos Detected

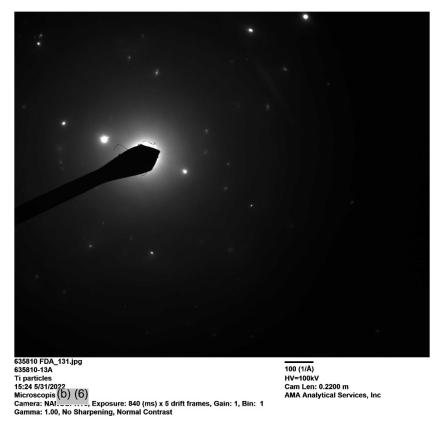
Below are pictures, diffraction patterns, and chemistry from some of the observed particles. The copper peaks in the chemistry spectra are from the TEM grid. The unidentified (and some identified) peaks in the chemistry spectra are zinc and carbon from the TEM specimen holder

## 635810-13A, Titanium Particles

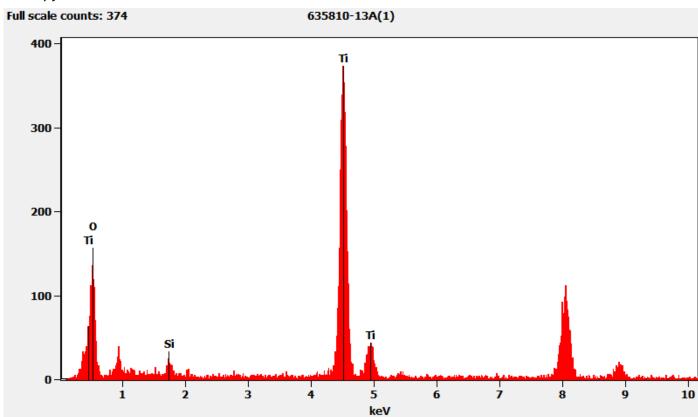


200 nm HV=100kV Direct Mag: 14000 x AMA Analytical Services, Inc

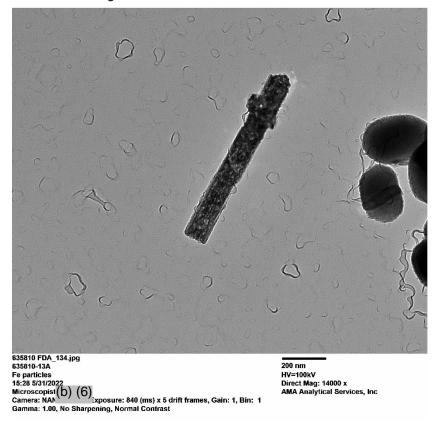
Diffraction Pattern from the Titanium Particles Pictured Above



## Chemistry from the Titanium Particles Pictured Above



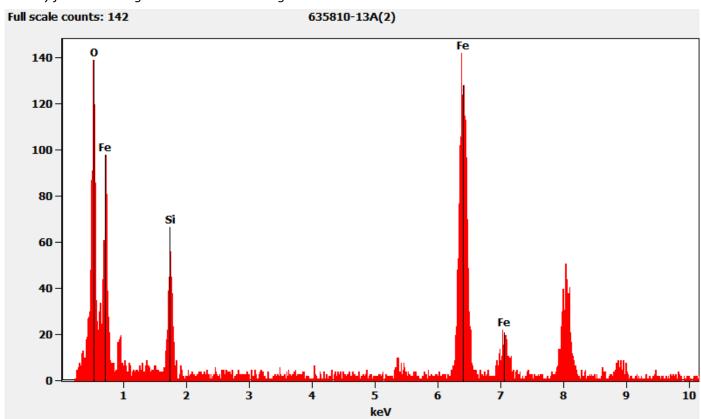
635810-13A, Elongated Particle Containing Silicon and Iron



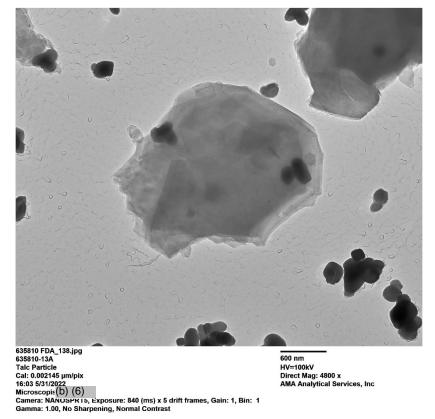
Diffraction Pattern from the Elongated Particle Containing Silicon and Iron Pictured Above



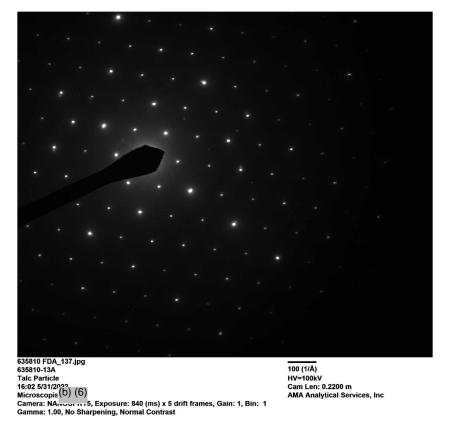
Chemistry from the Elongated Particle Containing Silicon and Iron Pictured Above



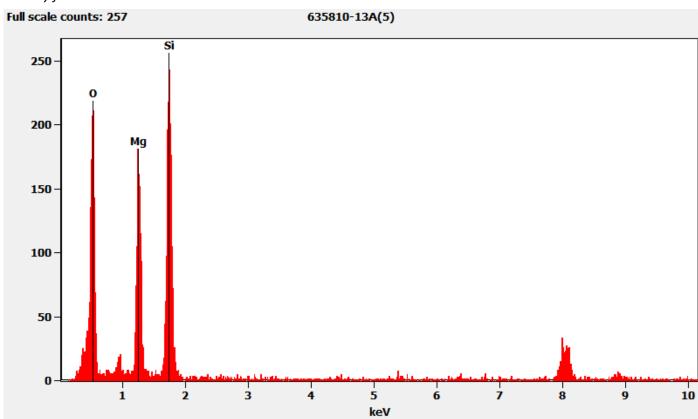
## 635810-13A, Talc Particle



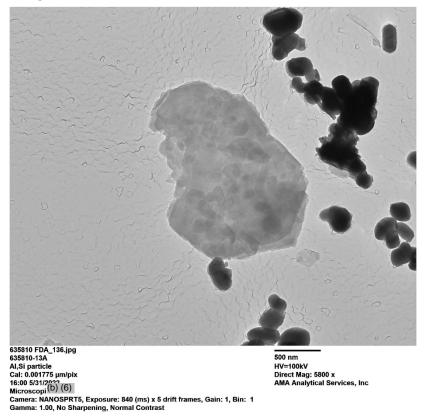
Hexagonal Diffraction Pattern from the Talc Particle Pictured Above



## Chemistry from the Talc Particle Pictured Above



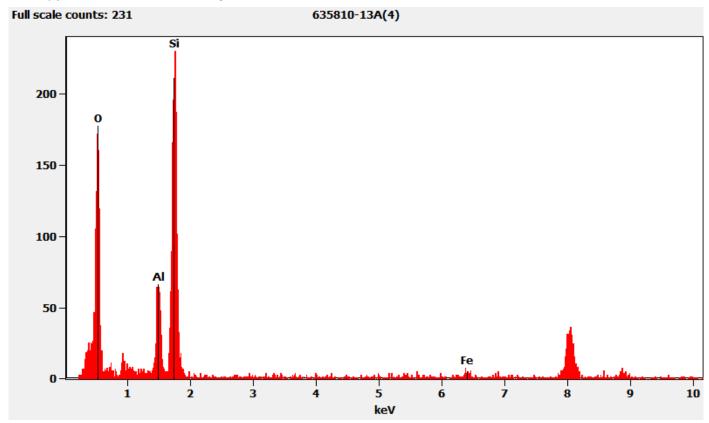
635810-13A, Particle Containing Aluminum and Silicon



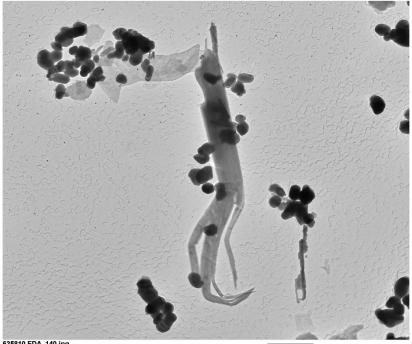
Diffraction Pattern from the Particle Containing Aluminum and Silicon Pictured Above



Chemistry from the Particle Containing Aluminum and Silicon Pictured Above



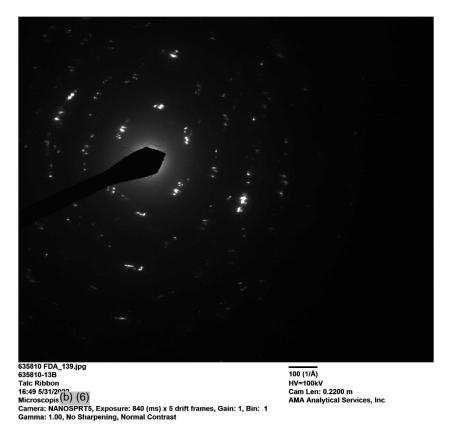
## 635810-13B, Talc Ribbon



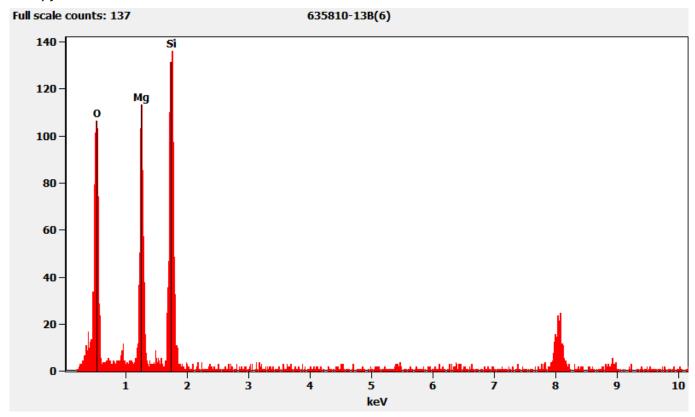
635810 FDA\_140.jpg 635810-13B Talc Ribbon Cal: 0.002860 µm/pix 16:51 5/31/20?2 Microscopist (b) (6) Camera: NANOSPRT5, Exposure: 840 (ms) x 5 drift frames, Gain: 1, Bin: 1 Gamma: 1.00, No Sharpening, Normal Contrast

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

Diffraction Pattern from the Talc Ribbon Pictured Above



## Chemistry from the Talc Ribbon Pictured Above



### **QC Discussion**

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

Matrix blank samples were prepared at rate of 10% or greater alongside the client samples with each series of samples that were put into the muffle furnace together. The matrix blank samples were prepared using Sigma-Aldrich Talc Powder 18654 (Cas No. 14807-96-6; EC No. 238-877-9, Lot 82330). Analysis of the matrix blank samples was only required if asbestos, or the non-asbestos versions of the regulated minerals, was found on the associated client samples unless otherwise noted. Matrix blank sample numbers NB22-286/287, NB22-296, NB22-305/306, NB22-314, NB22-324, and NB22-328/329 were not analyzed since no asbestos was observed on the associated client samples. Although it was not required, (b) (6) analyzed the matrix blank sample number NB22-295 on May 17, 2022; no asbestos was observed on this sample.

A talc reference control sample was randomly selected from our library of TEM grid preparations made from Sigma-Aldrich Talc Powder, <10 micron (Product No. 643604-500G; Batch No. 10830AJ) spiked with various levels of Chrysotile ranging from 0.4%-10%. One (1) reference control sample, sample number 635810-RB1, was analyzed with this set. It was analyzed by (b) (6) on May 10, 2022, and found to be within acceptable limits.

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.

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 58400, 58425, and 58465 were analyzed. (b) (6) analyzed these samples on August 8, 2022. No asbestos was detected on the TEM grid preparation blank samples.

Our laboratory information management system (LIMS) randomly selected sample 635810-11A/03302022-11 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 June 2, 2022, for PLM and by (b) (6) on September 14, 2022, for TEM. The QC results were consistent with the original findings.

Our laboratory information management system (LIMS) randomly selected samples 635810-4A/03302022-4 and 635810-4A/03302022-10 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 June 2, 2022, for PLM and by Andreas Saldivar on September 16, 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.

La Soli

9/23/2022

Date

Andreas Saldivar

President