

d On Results. CERTIFICATE OF ANALYSIS

Chain of Custody: 308004

Client: US Food & Drug Adminitration **Address:** Office of Cosmetics & Colors

4300 River Road

College Park, MD 20740

Attention: John Gasper

Job Name: Task 3 - Analysis of Official Samples

Job Location: 3rd Group - 2 Samples Job Number: CLIN 1 - Task 3 (2 Samples) PO Number: HHSF223201810337P Date Submitted: 5/29/2019

Date Analyzed: 7/25/2019 - 8/1/2019

Report Date: 8/14/2019
Date Sampled: Not Provided
Person Submitting: Steve Wolfgang

Revised: 8/30/2019, 3rd Revision

SUMMARY OF ANALYSIS

AMA	Client	TEM LOD	TEM LOQ	% Tremolite by TEM	% Chrysotile by TEM	% Total Tremolite & Chrysotile by TEM	%	%	% Acid	%	
Sample ID	Sample ID	Using ASTM D5756 Mass	Asbestos by PLM	Organics	Soluable	Other	Comments				
		Calculation	Calculation	Calculation	Calculation	Calculation	Dy I LIVI				
308004-1	D-49	0.00000115%	0.0000946%	0.13214%	< 0.00001%	0.13214%	ND	12.2%	16.5%	71.3%	
308004-1A	D-49	0.00000133%	0.00000532%	0.00018%	0.00002%	0.00020%	ND	12.4%	14.7%	72.8%	
308004-1B	D-49	0.00000153%	0.00000612%	0.20597%	0.00193%	0.20790%	ND	12.5%	14.3%	73.1%	

LOQ = 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

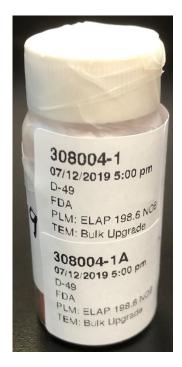


Technical Director: Andreas Saldivar

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

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public, and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter nor shall it be reproduced, except in full, without prior written authorization from us. Sample types, locations, and collection protocols are based upon the information provided by the persons submitting them and, unless collected by personnel of these Laboratories, we expressly disclaim any knowledge and liability for the accuracy and completeness of this information. Residual sample material will be discarded in accordance with the appropriate regulatory guidelines, unless otherwise requested by the client. NVLAP accreditation applies only to polarized light microscopy of bulk samples and transmission electron microscopy of AHERA air samples. This report must not be used to











Sample Preparation

Samples were prepared for PLM and TEM bulk analysis by Chon Simpha on July 2, 2019 through July 9, 2019. Sample preparation consisted of the following steps:

- 1) Label and weigh two 8mL glass vials for each sample in the set one vial for the PLM preparation and one vial for the TEM preparation.
- 2) Weigh out 0.1 to 0.8 grams of material and place in 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 concentrated hydrochloric acid.
- 6) Filter acid reduced material onto a pre-weighed 47mm 0.4um PolyCarbonate filter.
- 7) Place filter into drying oven for 30 minutes and then record Post-Acid Reduced weight.

- 8) Make four PLM slide preparations from the PLM residual ash for each sample in 1.550 dispersion oil. Make additional preparations in 1.605, 1.625, 1.680 and 1.700 dispersion oil as necessary for particle identification.
- 9) Weigh a portion of the residue from the TEM residual ash and place it into the corresponding pre-weighed 100ml jar.
- 10) Fill the 100ml jar with deionized water
- 11) Sonicate the jars for approximate 5-minutes.
- 12) Filter 0.2ml to 1ml of the solution onto a 47mm 0.22um MCE filter.
- 13) Dry the filter for 10 minutes then collapse, carbon coat, and place on a 3 TEM grids.

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. 400-point count was performed for those samples on which asbestos or a regulated amphibole 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.

TEM Analysis

Analysis was performed in accordance with modified NY ELAP Method 198.4 protocols. The analysis was performed using a JEOL JEM-100CX II transmission electron microscope (TEM), equipped with a Thermo Fisher Quest Energy Dispersive X-Ray Analyzer (EDXA), at magnifications of 19,000x. Two grids for each aliquot were examined. Twenty (20) grid openings were examined per sample.

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 0.22um MCE filter.
- 2) The tremolite and chrysotile were not visually estimated. The length and width of the observed particles were measured and the mass of each particle was calculated using the ASTM D5756 method. All particles identified as tremolite 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

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ASTM D5756 Mass

M = π/4 L * W² * D * 10<sup>-12</sup>

M = mass
L = length
W = width
D = density

Percent Calculation

EFA(mm²) * 100ml * MA(g) * RW(g)

VF(ml) * IW(g) * AA(mm²) * RJ(g)

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

EFA – Effective filter area
MA – Mass of asbestos
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RW – Weight of residue VF – Volume filtered IW – Initial weight of the sample

AA – Area analyzed

RJ – Weight of residue placed into the jar

Limit of Detection and Quantification

We used the mass of a 0.5 x 0.04-micron chrysotile fiber as the basis for our calculations. Limit of detection was defined as 1 fiber and limit of quantification was defined as 4 fibers.

Some aliquots of samples D-49 contained very small amounts of asbestos that were either at or below our 4-fiber limit of quantification. For these samples we defined our limit of quantification as follows:

308004-1: mass of the single observed chrysotile fiber plus the mass of three tremolite fibers measuring 0.5 x 0.04 microns

Discussion and Interpretation of Analytical Findings:

PLM

All three aliquots of sample D-49 were analyzed by Peerawut Chaikeenee on July 25, 2019. No asbestos or non-asbestos amphibole variants were detected the samples. The results were calculated using the equations detailed in the calculations section.

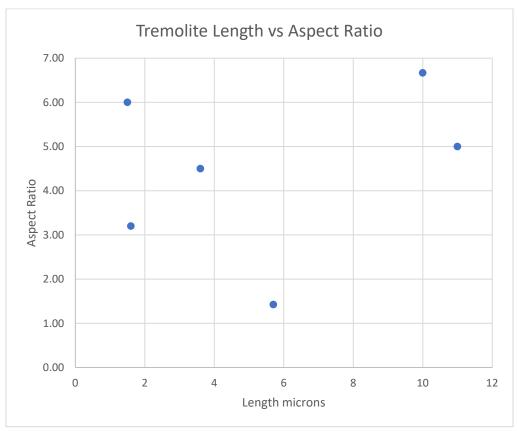
308004-1	NAD
308004-1A	NAD
308004-1B	NAD

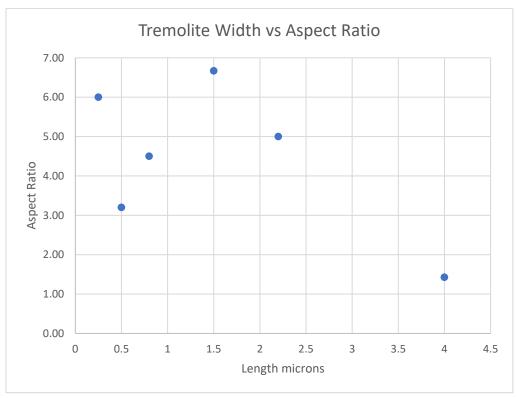
TEM

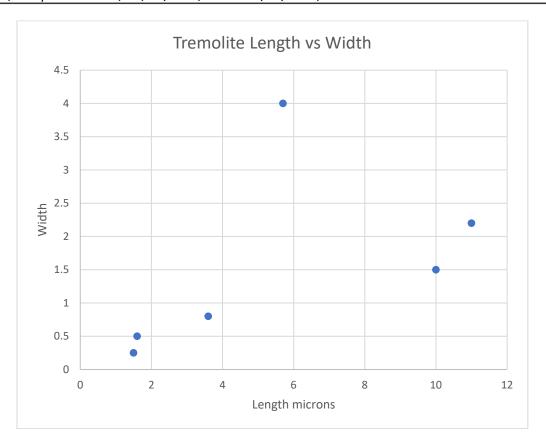
Michael Greenberg analyzed sample 1 on July 29, 2019, 1A on July 30, 2019 and 1B on August 1, 2019. The sample consisted of a mix of talc and mica particles, with a few talc fibers, mica fibers and titanium fibers/particles. Chrysotile and tremolite were observed on all three aliquots. The results were calculated using the equations detailed in the calculations section.

308004-1	0.13214%
308004-1A	0.00020%
308004-1B	0.20790%

The following charts plot aspect ratio vs. length, aspect ratio vs. width, and length vs. width for all the tremolite particles counted over all three aliquots.

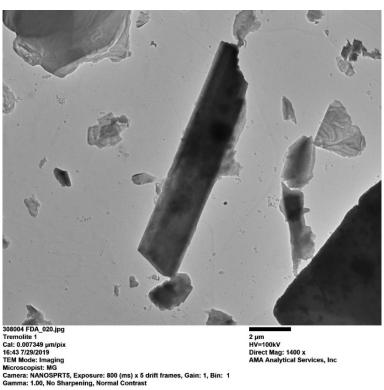






Below are representative pictures, diffraction patterns, and chemistry from the observed particles. The unidentified peaks in chemistry spectra are copper, zinc, and carbon. Those peaks are from the TEM specimen holder and specimen grid.

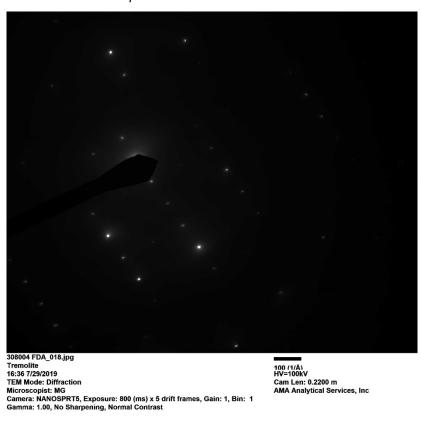
Tremolite Particle from 308004-1



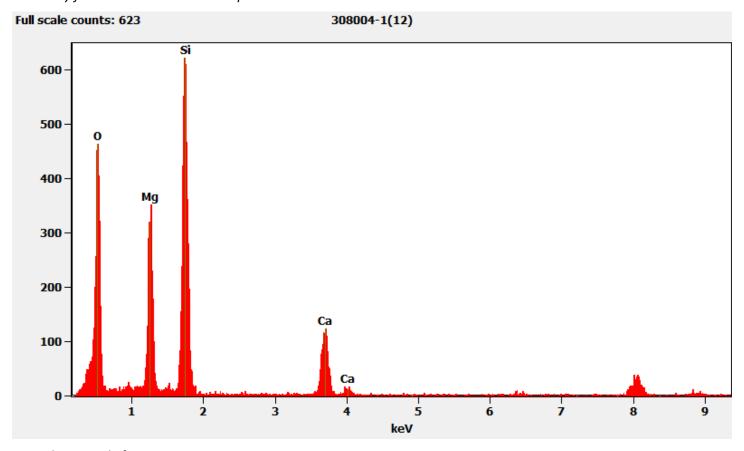
Zone-Axis Diffraction Pattern from the Tremolite Particle pictured above



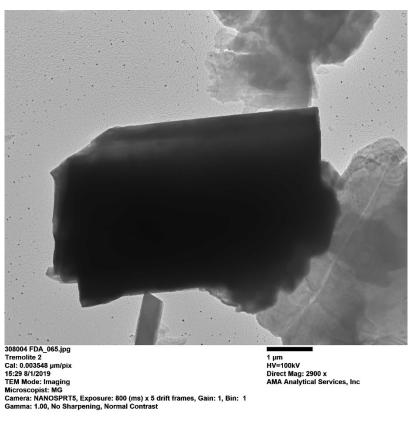
Diffraction Pattern from the Tremolite Particle pictured above



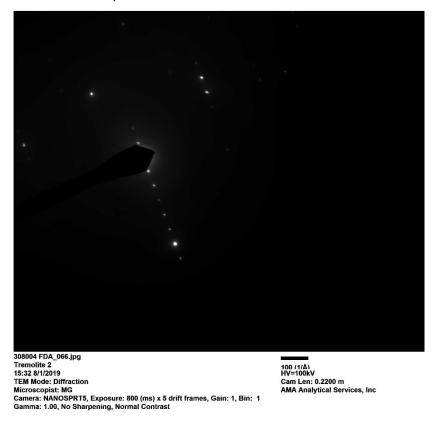
Chemistry from the Tremolite Particle pictured above



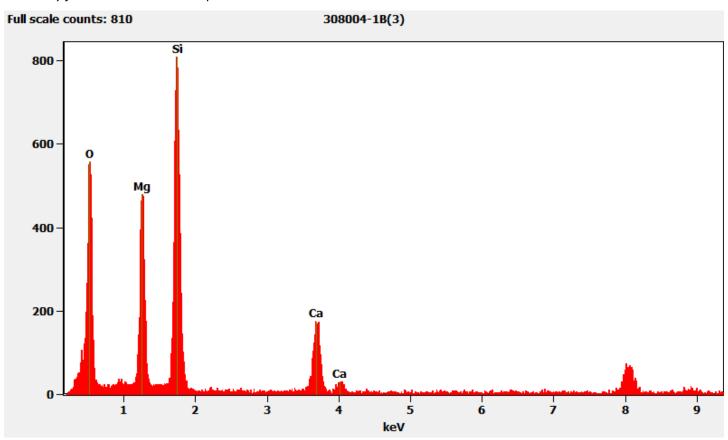
Tremolite Particle from 308004-1B



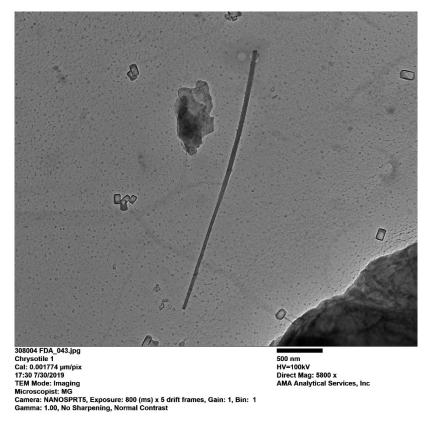
Diffraction Pattern from Tremolite Particle pictured above



Chemistry from Tremolite Particle pictured above



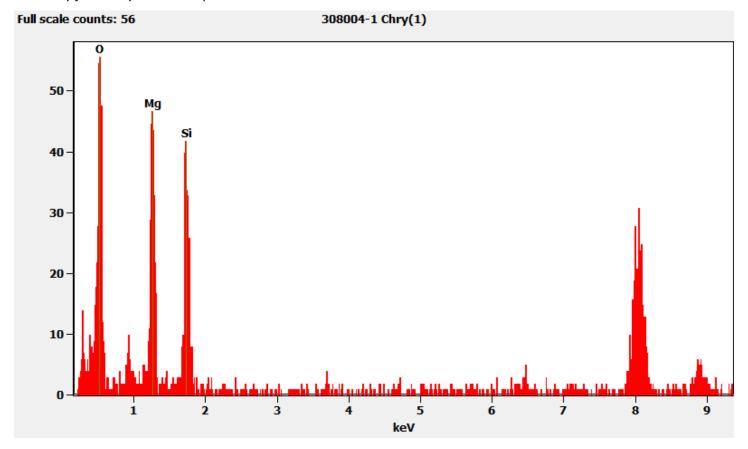
Chrysotile Fiber from 308004-1A



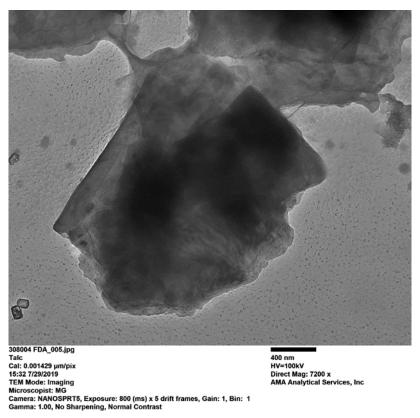
Diffraction Pattern from Chrysotile Fiber pictured above



Chemistry from Chrysotile Fiber pictured above



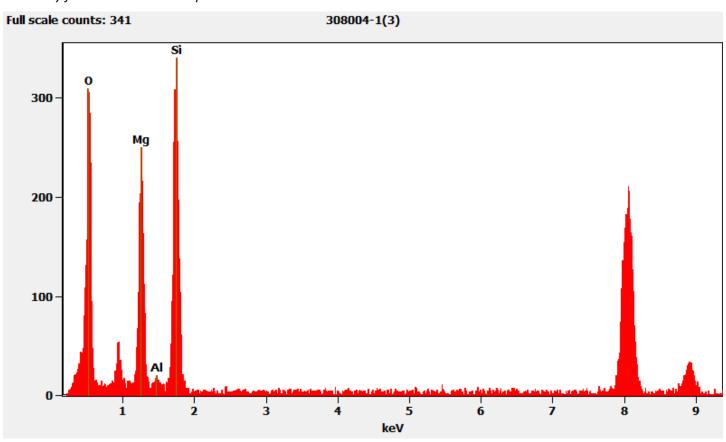
Talc Particle from 308004-1



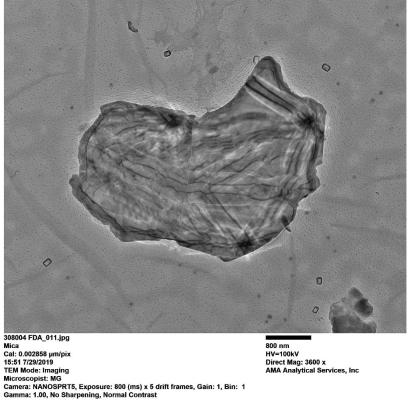
Diffraction Pattern from the Talc Particle pictured above



Chemistry from the Talc Particle pictured above



Mica Particle from 308004-1



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

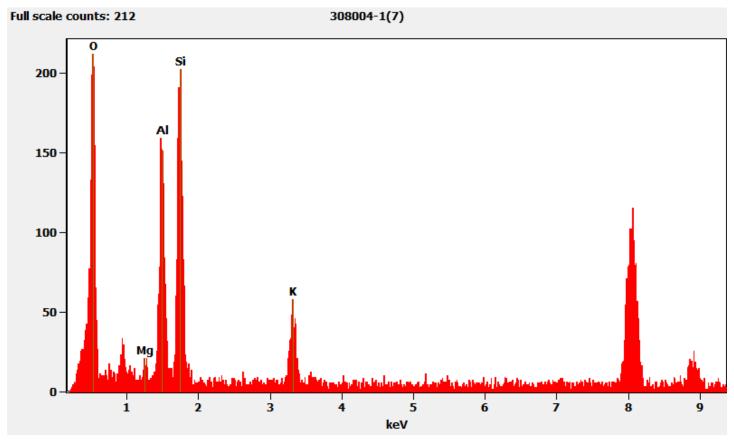
Diffraction Pattern from the Mica Particle pictured above



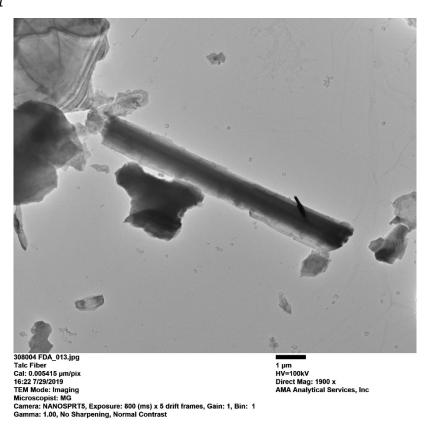
308004 FDA_U12.jpg
Mica
15:52 7/29/2019
TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

Chemistry from the Mica Particle pictured above

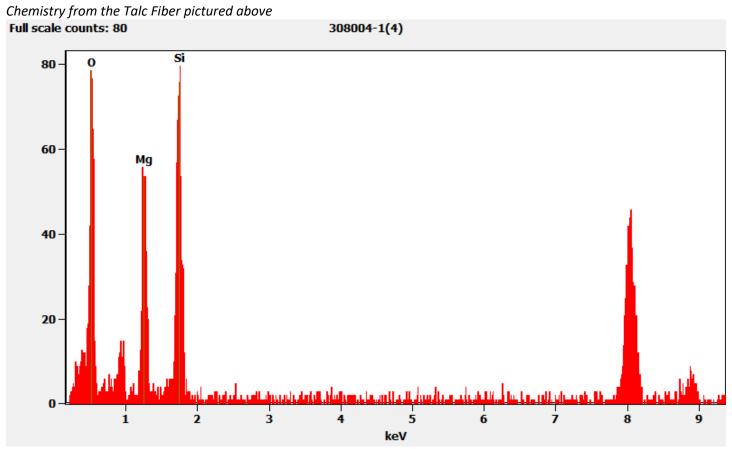


Talc Fiber from 308004-1

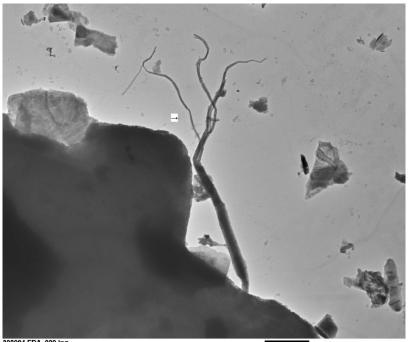


Diffraction Pattern from the Talc Fiber pictured above





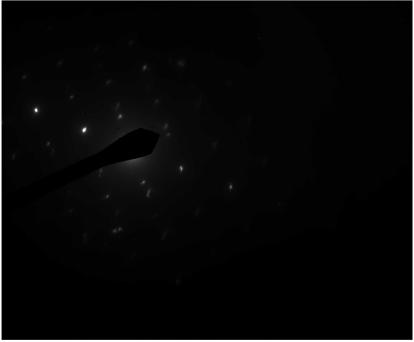
Talc Ribbon from 308004-1



308004 FDA_009.jpg
Talc Ribbon
Cal: 0.007349 µm/pix
15:43 7/29/2019
TEM Mode: Imaging
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (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

Diffraction Pattern from the Talc Ribbon pictured above

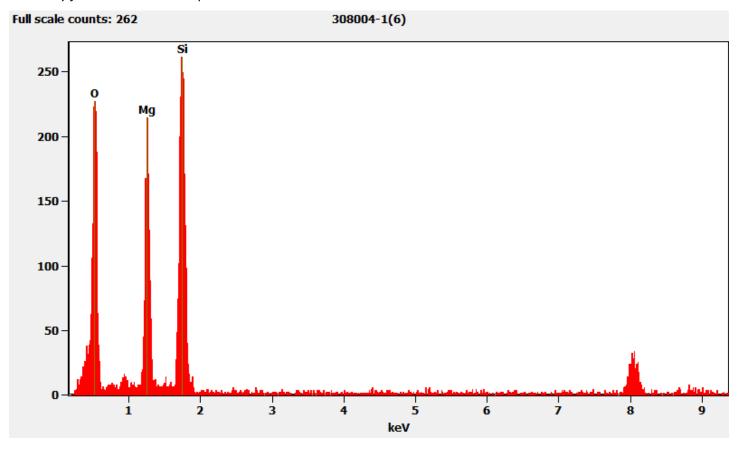


308004 FDA_010.jpg Talc Ribbon 15:45 7/29/2019

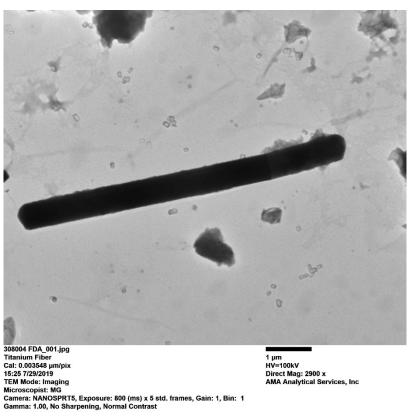
TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

Cam Len: 0.2200 m AMA Analytical Services, Inc

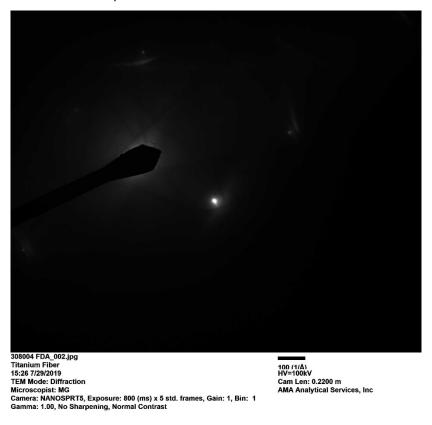
Chemistry from the Talc Ribbon pictured above



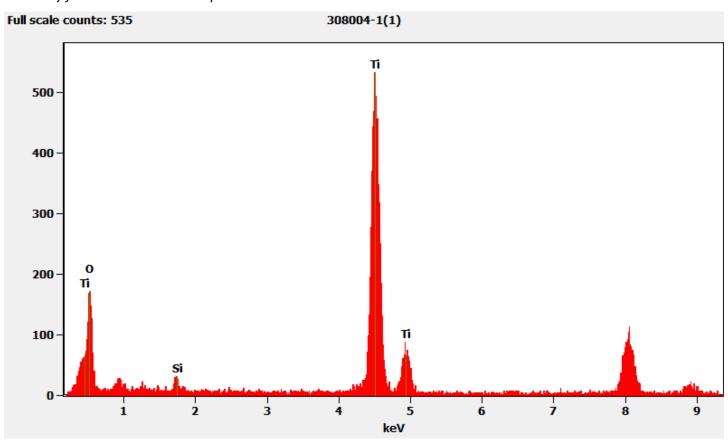
Titanium Fiber from 308004-1



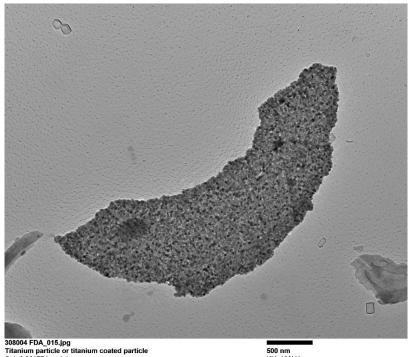
Diffraction Pattern from the Titanium Fiber pictured above



Chemistry from the Titanium Fiber pictured above



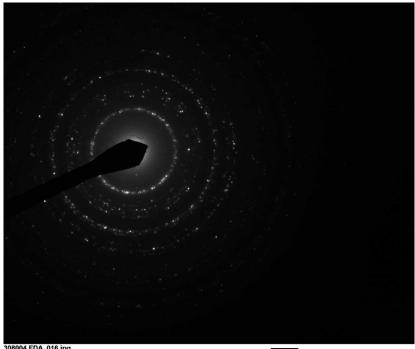
Particle coated with Titanium from 308004-1



308004 FDA_015.jpg
Titanium particle or titanium coated particle
Cal: 0.001774 jmr/pix
16:25 7/29/2019
TEM Mode: Imaging
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (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

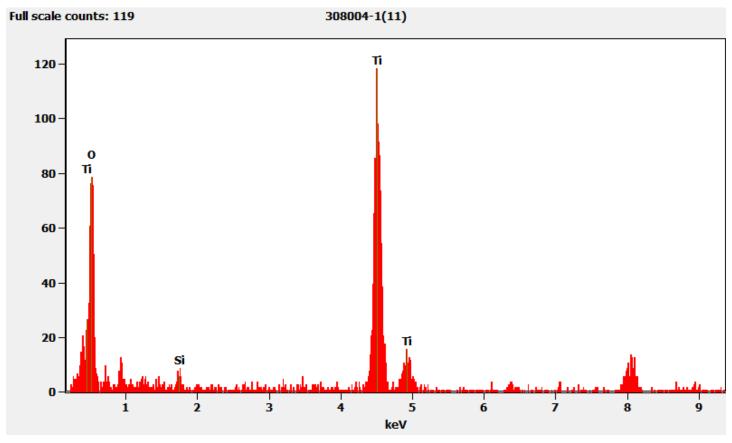
Diffraction Pattern from the Titanium Coated particle pictured above



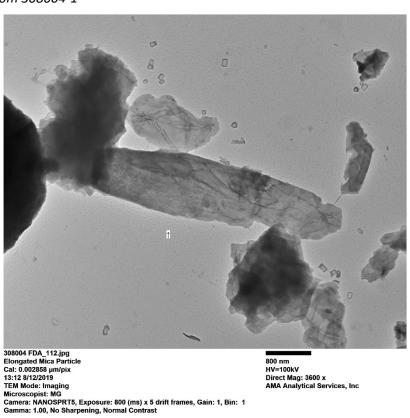
308004 FDA_016.jpg
Titanium particle or titanium coated particle
16:26 7/29/2019
TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

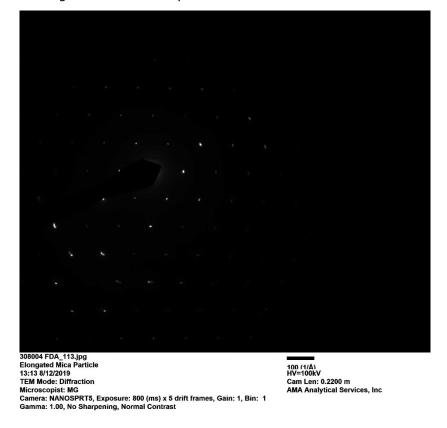
Chemistry from the Titanium Coated Particle pictured above



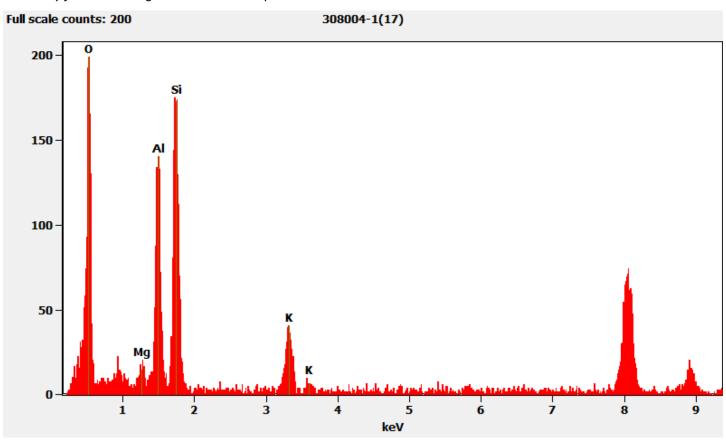
Elongated Mica Particle from 308004-1



Diffraction Pattern from the Elongated Mica Particle pictured above



Chemistry from the Elongated Mica Particle pictured above



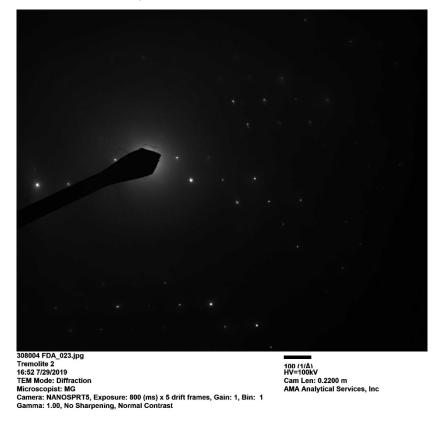
Tremolite Particle from 308004-1



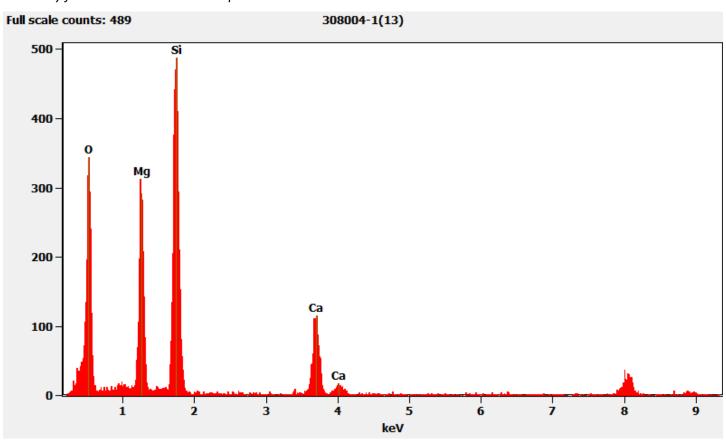
Diffraction Pattern from the Tremolite Particle pictured above



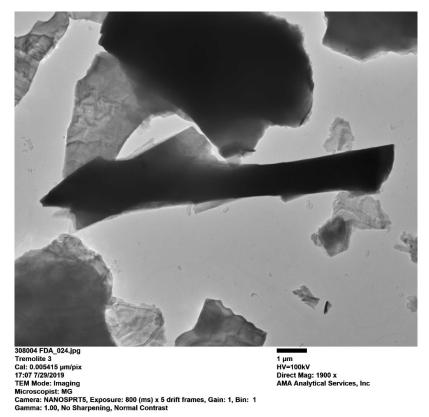
Diffraction Pattern from the Tremolite Particle pictured above



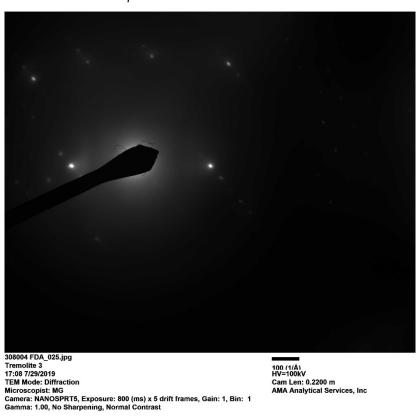
Chemistry from the Tremolite Particle pictured above



Tremolite Particle from 308004-1



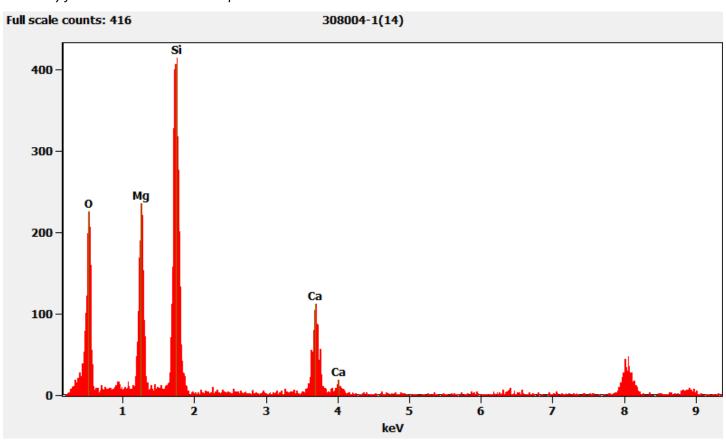
Diffraction Pattern from the Tremolite Particle pictured above



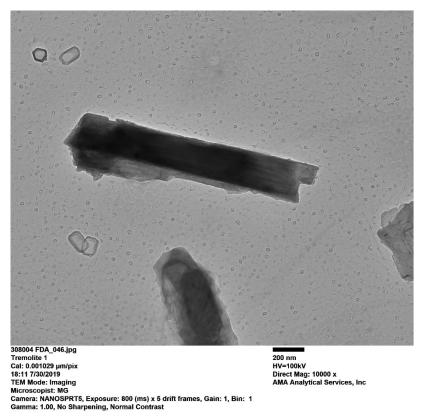
Diffraction Pattern from the Tremolite Particle pictured above



Chemistry from the Tremolite Particle pictured above



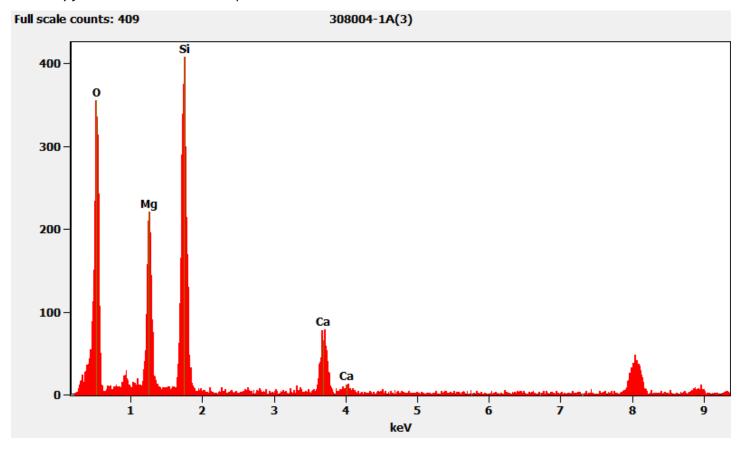
Tremolite Particle from 308004-1A



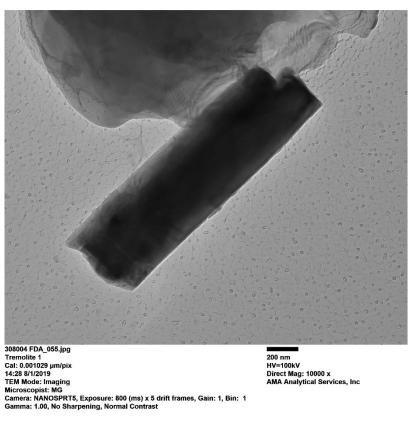
Diffraction Pattern from the Tremolite Particle pictured above



Chemistry from the Tremolite Particle pictured above



Tremolite Particle from 308004-1B



Diffraction Pattern from the Tremolite Particle pictured above



Cam Len: 0.2200 m AMA Analytical Services, Inc

Diffraction Pattern from the Tremolite Particle pictured above

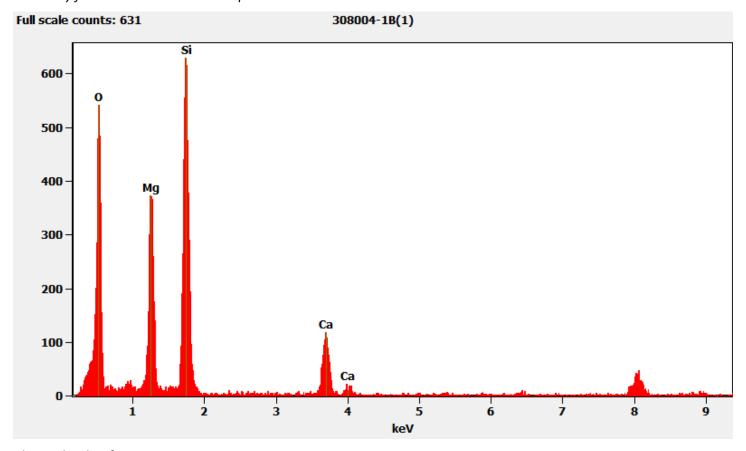


308004 FDA_057.jpg Tremolite 1

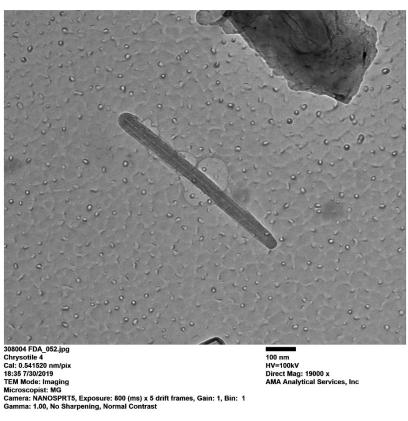
Tremounte 1
4:32 8/1/2019
TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (ms) x 5 drift frames, Gain: 1, Bin: 1
Gamma: 1.00, No Sharpening, Normal Contrast

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

Chemistry from the Tremolite Particle pictured above



Chrysotile Fiber from 308004-1



Diffraction Pattern from the Chrysotile Fiber pictured above



308004 FDA_050.jpg Chrysotile 4 18:33 7/30/2019

TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (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

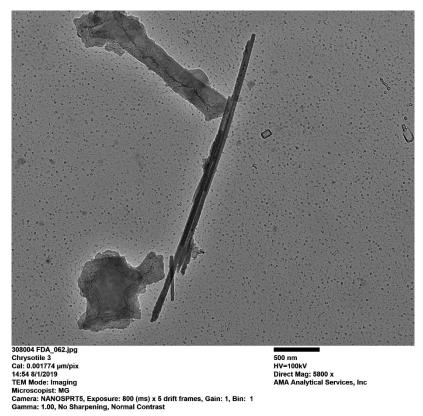
Diffraction Pattern from the Chrysotile Fiber pictured above



308004 FDA_051.jpg
Chrysotile 4
18:34 7/30/2019
TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (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

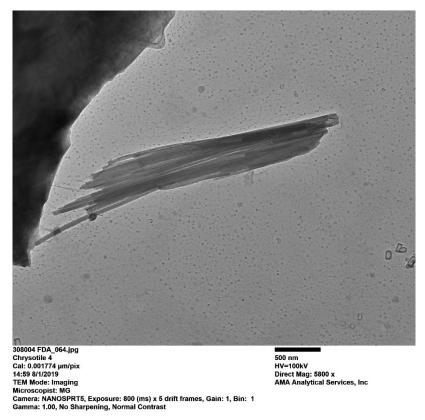
Chrysotile Structure from 308004-1B



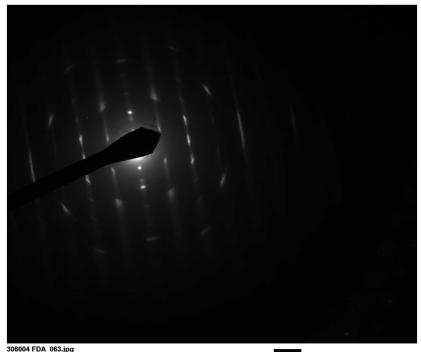
Diffraction Pattern from the Chrysotile Structure pictured above



Chrysotile Structure from 308004-1B



Diffraction Pattern from the Chrysotile Structure pictured above



308004 FDA_063.jpg
Chrysotile 4
14:58 8/1/2019
TEM Mode: Diffraction
Microscopist: MG
Camera: NANOSPRT5, Exposure: 800 (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

QC Discussion:

During preparation, one blank control sample and one reference control sample were prepared. These samples were prepared alongside the customer samples. The blank sample was prepared using Sigma-Aldrich Talc Powder, <10 micron. No asbestos was detected on the blank sample. The reference sample was made from the same Sigma-Aldrich talc powder spiked with 1% Chrysotile. The reference sample was analyzed by and found to be within acceptable limits.

Our LIMS randomly selects samples for additional replicate and duplicate QC. 308004-1, 1A, and 1B/D-49 were not selected for any additional QC analysis.

Attachments:

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

- 1) Sample Log-In Sheet
- 2) Daily PLM Scope Calibration Log
- 3) Refractive Index Oil Calibration Log
- 4) Daily TEM Scope Calibration Log
- 5) QC Results Summary
- 6) Replicate and Duplicate QC Charts for Peerawut Chaikeenee for samples analyzed between 1/1/2019 & 8/8/2019
- 7) Replicate and Duplicate QC Charts for Michael Greenberg for samples analyzed between 1/1/2019 & 8/8/2019
- 8) Raw Data Sheets
 - a. Gravimetric Data
 - b. Filtration Worksheets
 - c. PLM Analysis
 - d. TEM Analysis
 - e. QC Samples

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

Andreas Saldivar

Laboratory Director

Data

8/14/2019