

ORIGINAL

**TSCA NON-CONFIDENTIAL BUSINESS INFORMATION**

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COMMENTS:

**DOES NOT CONTAIN CBI**

MR# 329804



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September 2, 2010

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Document Processing Center (7407M)  
EPA East – Room 6428  
Attn: 8(e) Coordinator  
US Environmental Protection Agency  
1201 Constitution Avenue, NW  
Washington, DC 20004-3302



**Re: TSCA 8(e) Submission for Vanadyl Sulfate (VOSO<sub>4</sub>) (solid) (with hydration); CAS # 27774-13-6) [vanadyl sulfate hydrate]**

Dear Sir or Madam:

The Vanadium Producers & Reclaimers Association (VPRA) hereby submits to the United States Environmental Protection Agency (EPA) a Toxic Substances Control Act (TSCA) section 8(e), 15 U.S.C. § 2607(e), submission for preliminary results from an acute inhalation toxicity study on an aqueous solution of vanadyl sulfate hydrate. This filing is part of a systematic investigation to establish acute toxicology LC<sub>50</sub> cut-off values (mg/L) for several vanadium compounds. These substances have not previously been subject to this kind of testing and results are being generated within a range of acute exposure levels that EPA advises should be considered for 8(e) reporting. As a result, several 8(e) filings have been made already in conjunction with this systematic testing program.

More specifically, the data being submitted today are the most recent results from a single study to establish an LC<sub>50</sub> cut-off value for vanadyl sulfate hydrate. Previous reports filed on May 13, 2010 and August 5, 2010 addressed higher acute exposure levels for vanadyl sulfate. In addition, this submission further clarifies that the test material is vanadyl sulfate hydrate, rather than simply vanadyl sulfate as previously reported.

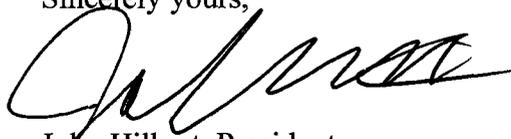
The data being reported were received on August 9, 2010 by VPRA members who manufacture this substance. These data are as follows:

**CONTAINS NO CBI**

<b>Vanadyl Sulfate Acute Nose-Only Inhalation Study Results – Mice</b>					
<b>Test Conc. (mg/L)</b>	<b>Total Deaths</b>	<b>Animal Number</b>	<b>Day of Death</b>	<b>Clinical Signs (number of animals with finding)</b>	<b>Necropsy Findings</b>
0.5 (0.53)	Males 3/3	1	1	Skin/fur discoloration (2) Wet inguinal fur (1)	Lungs Mottled dark red
		2	2		Lungs Mottled dark red
		3	1		Lungs Mottled dark red
0.5 (0.53)	Females 3/3	4	3	Normal (2) Wet inguinal fur (3) Hypoactive (1)	Lungs bright red
		5	3		Lungs pale pink
		6	3		No Gross Lesions

No acute toxicity data have previously been publicly available for an aqueous solution of vanadyl sulfate hydrate at the 0.5 mg/L exposure level in mice, so these data represent new information for this substance.

Sincerely yours,



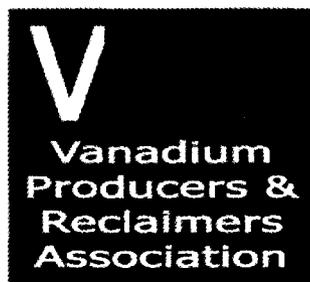
John Hilbert, President

Vanadium Producers & Reclaimers Association

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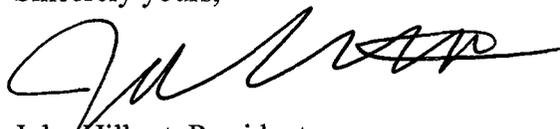
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