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April 9, 2010

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Attention: 8(e) Coordinator
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302

**Re: TSCA 8(e) Submission for Vanadium Trioxide (CASRN 1314-34-7) and
Vanadium Pentoxide (CASRN 1314-62-1)**

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 acute inhalation studies on vanadium trioxide (V_2O_3) and vanadium pentoxide (V_2O_5). In these studies, male and female mice and rats were separately subjected to a 4-hour nose-only acute inhalation test with doses of 2 mg/L of each vanadium compound. The enclosed table provides the mortality results from the studies.

We note that study results are interim in nature and no reports have been prepared. In addition, during V_2O_3 exposure, the dust feeder experienced considerable clogging and the equipment stopped several times, with parts requiring replacement or adjustment. During both the V_2O_3 and V_2O_5 exposures, the test material collected on the fur of the test animals. Due to equipment downtime during the V_2O_3 study, the study duration had to be increased to mitigate the effect on the protocol-required exposure time. The effects of these equipment and test substance delivery issues on the results are unknown.

Sincerely yours,

John Hilbert, President
Vanadium Producers & Reclaimers Association

Enclosure



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DRAFT

UNAUDITED

CUMULATIVE MORTALITY – ACUTE INHALATION LIMIT TEST

TEST ARTICLE	SPECIES	MALES [DEAD/N]	FEMALES [DEAD/N]
V205 ^a	MOUSE	5/5	5/5
V205 ^a	RAT	5/5	5/5
V203 ^b	MOUSE	0/5	3/5
V203 ^b	RAT	0/5	2/5

^aThe inhalation exposure was conducted on 3/10/2010

^bThe inhalation exposure was conducted on 3/11/2010

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