VPRA – EPA IRIS Vanadium Compounds RfC

July 14, 2021

1:00 pm



Introduction to VPRA

- Vanadium Producers & Reclaimers Association
- North American Trade Association
- Small industry: 2 full members representing producers of Ferrovanadium, Vanadium Oxides and Vanadium Chemicals
- Roughly 300 total workers employed in the US
- No domestically-mined vanadium in the US
- Secondary recycling from petroleum waste streams
- "Spent catalyst" would otherwise be a EPA Listed Hazardous Waste



A hard-silver-grey metallic element, used in:

- I. Steel
- 2. Chemicals and Catalysts
- 3. Master Alloys
- 4. Energy Storage

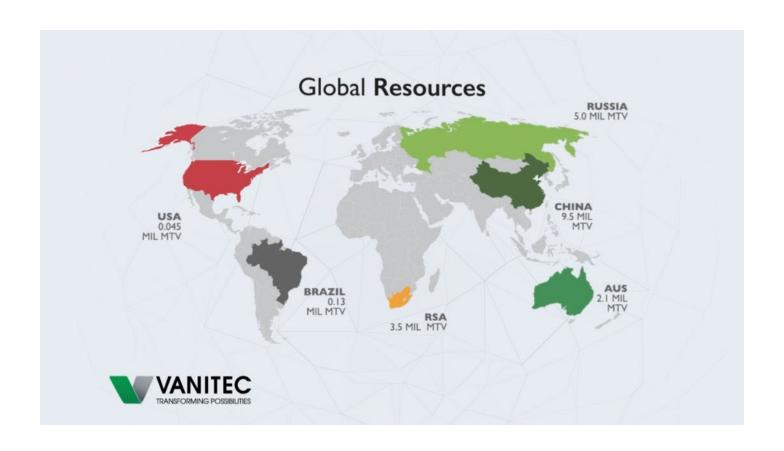




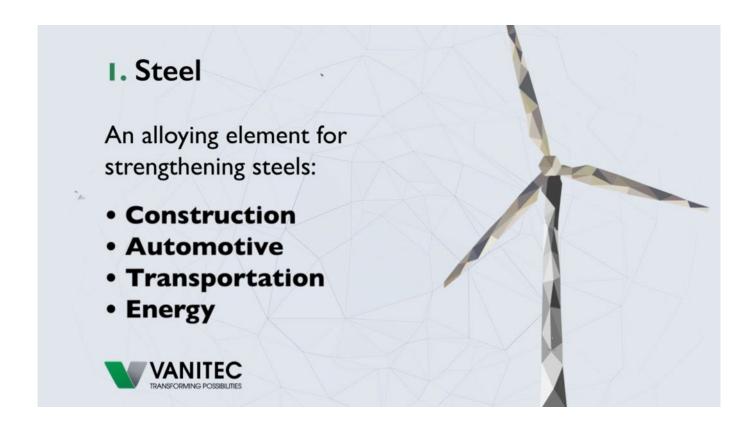












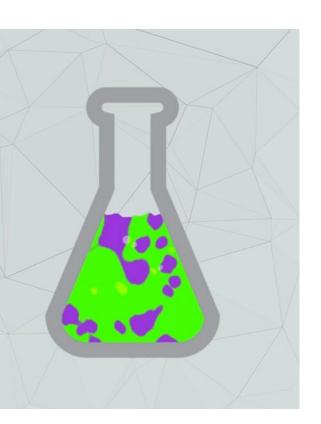


2. Chemicals & Catalysts

Corrosion resistant and pigmentation chemicals:

- Sulfuric acid
- Colouring compounds
- Cathodes in (rechargeable)
 lithium batteries
- Vanadium electrolyte

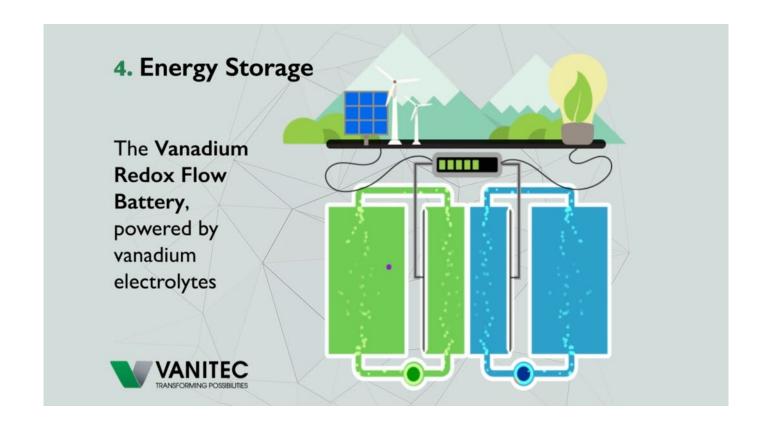




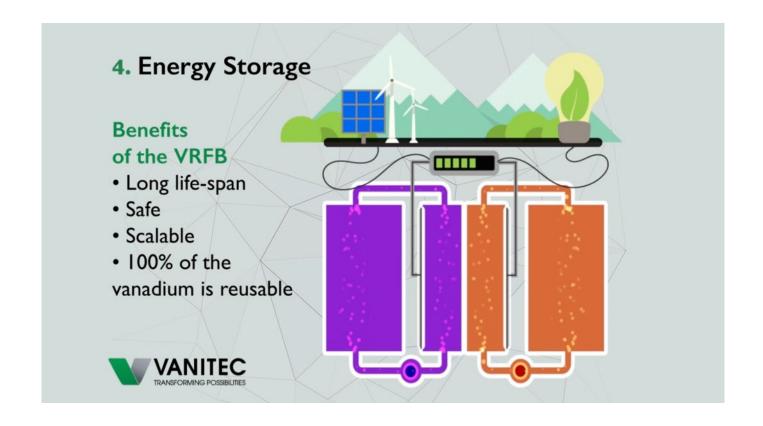














Vanadium: Critical Mineral

- 2018 Vanadium officially included on US list of "Critical Minerals" by USGS
- 35 commodities essential for:
 - National Security
 - Economic Security
- Supply chain vulnerable to imports
- Absence would have significant consequences
- President Biden February 24, 2021 EO confirmed importance of these minerals





VPRA IRIS Comments

- EPA should update and re-issue the IAP correcting errors and omissions
- Vanadium industry quite small so additional time to review steps of RfC and RfD helpful – thank you for additional 2 weeks
- Specific comments covered by scientists & chemists
- Endorse recommendation of Dr. Judith MacGregor that EPA conduct a workshop on environmental chemistry of vanadium compounds for RfC and RfD.



Thank you!

