



April 20, 2026

VIA E-MAIL

House Committee on Energy and Commerce
Subcommittee on Environment
delivered c/o Ms. Christen Harsha
2125 Rayburn House Office Building
Washington, D.C. 20515

Re: AMG Vanadium LLC (“AMG”) Executive Summary of Written Testimony
for:

*Wednesday, April 22, 2026, 2:00 p.m., House Energy and Commerce
Subcommittee on Environment, “Help or Hindrance? The Impact of United
States Environmental Laws on Critical Material Supply Chains, National
Security, and Economic Growth.”*

Chairman Palmer, Vice Chairman Crenshaw, Ranking Member Tonko, and Members of the
House Energy and Commerce Subcommittee on Environment:

Please find enclosed my written testimony for the subject hearing. Per the submission
requirements, please find below a one-page executive summary and my personal bio.

Executive Summary:

AMG Vanadium LLC is the only domestic producer of ferrovanadium in the United States, using reclamation operations in Ohio to recover vanadium and other critical minerals and valuable metals from spent petroleum refinery catalysts for use in steel, infrastructure, defense, and energy applications. AMG’s central concern is that shifting interpretations of the Resource Conservation and Recovery Act, particularly by EPA Region 5 staff, have created regulatory uncertainty around whether these spent catalysts should be treated as recyclable material or hazardous waste, despite decades of Ohio-issued variances, prior federal concurrence, and substantial company investment made in reliance on that framework. AMG contends that this uncertainty threatens domestic critical-mineral recovery, risks pushing valuable material overseas for foreign processing, and undermines both the resource-recovery purpose of RCRA and broader United States national security and economic interests. AMG therefore supports modernizing RCRA to clearly protect legitimate domestic recycling of spent catalysts, arguing that a modernized framework would strengthen critical material supply chains, enhance national security, and support economic growth while preserving environmental safeguards.

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Jane Neal Bio:

Ms. Jane Neal is the Senior Vice President of AMG Vanadium, leading the Vanadium Sourcing and Environmental, Health, and Safety teams. Ms. Neal has a wealth of manufacturing experience in quality, engineering and process control, operational leadership, and environmental management. Prior to joining AMG Vanadium, Ms. Neal held technical and operational leadership roles at Weirton Steel, Roll Coater in Weirton, WV, and Nucor's Crawfordsville, Indiana Plant.

Ms. Neal is a member and past chair of the Ohio Manufacturers' Association Board of Directors, and serves on the Health, Safety, and Environmental Committee of Vanitec Limited, a not-for-profit global vanadium industry organization. She has a Bachelor of Science Degree in Metallurgical Engineering from The Ohio State University and an MBA from West Virginia University.

Thank you for providing this opportunity. Please don't hesitate to contact me directly at jneal@amg-v.com with any questions.

Sincerely,

/s/ Jane Neal

Jane Neal
Senior Vice President
AMG Vanadium LLC

Enclosure:

cc: The Honorable Gary Palmer, Chairman
The Honorable Dan Crenshaw, Vice Chairman
The Honorable Paul Tonko, Ranking Member
The Honorable Bob Latta
The Honorable Morgan Griffith
The Honorable Buddy Carter
The Honorable John Joyce
The Honorable Randy Weber
The Honorable August Pfluger
The Honorable Mariannette Miller-Meeks
The Honorable Laurel Lee
The Honorable Nick Langworthy
The Honorable Gabe Evans

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The Honorable Julie Fedorchak
The Honorable Brett Guthrie
The Honorable Jan Schakowsky
The Honorable Raul Ruiz
The Honorable Scott Peters
The Honorable Nanette Diaz Barragán
The Honorable Darren Soto
The Honorable Jake Auchincloss
The Honorable Troy Carter
The Honorable Rob Menendez
The Honorable Greg Landsman
The Honorable Frank Pallone
Tom Centa - AMG Vanadium, LLC
David DiStefano – Capitol Network
Steve Dimon - 21 Consulting LLC
David Edelstein - Vorys, Sater, Seymour and Pease LLP



W R I T T E N T E S T I M O N Y

TO: Chairman Palmer, Vice Chairman Crenshaw, Ranking Member Tonko, and Members of the House Energy and Commerce Subcommittee on Environment:

CC: Tom Centa, President, AMG Vanadium LLC
David Edelstein, Vorys, Sater, Seymour and Pease LLP

FROM: Jane Neal, Senior Vice President, AMG Vanadium LLC

DATE: April 20, 2026

RE: AMG Vanadium LLC (“AMG”) Written Testimony for:
Wednesday, April 22, 2026, 2:00 p.m., House Energy and Commerce Subcommittee on Environment, “Help or Hindrance? The Impact of United States Environmental Laws on Critical Material Supply Chains, National Security, and Economic Growth.”

My name is Jane Neal and I am the Senior Vice President of AMG Vanadium LLC, a United States-based manufacturer and metals reclaimer. We produce ferrovanadium and other alloys from spent petroleum refinery catalysts – a material that, absent our recycling process, would be classified as hazardous waste. AMG operates two facilities in Ohio (Cambridge and Zanesville) that together form the only domestic source of ferrovanadium in the United States. Our company’s proprietary process converts more than 99% of the vanadium-bearing material in spent catalysts into products used for steel that goes into infrastructure, defense, energy, and other strategic industries. We are proud to support roughly 240 Ohio jobs and to invest heavily in keeping critical-mineral supply chains secure and domestic.

Vanadium is a metal on the federal “critical minerals” list, and its uses are vital to our national economy and security. More than 90% of the vanadium consumed in the United States

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goes into steel alloys, where it dramatically increases the strength and durability of rebar, bar, beams, pipelines, ship hulls, bridges, and other infrastructure. In fact, vanadium is the only metal that can be used in certain aerospace alloys. Vanadium is also used in advanced batteries for grid-scale energy storage, which helps make our electric grid more reliable and resilient. Finally, vanadium strengthens the steel used in ballistic armor plating for our servicemembers' military vehicles. Ensuring a stable United States supply of vanadium is therefore a matter of industrial and national security.

Unfortunately, nearly all other sources of vanadium originate overseas. The United States has no operating vanadium mine today, and the United States relies on imports for a large share of its needs. China and Russia remain the world's leading vanadium producers, and the United States continues to import roughly 60% of the vanadium it consumes, despite our country's growing demand. Against that background, AMG's work is strategically important. By recycling spent catalysts – rather than letting those catalysts be shipped overseas for foreign nations to recover and sell back to the United States government and manufacturers – AMG recovers vanadium here at home. In doing so, we relieve United States steelmakers and defense manufacturers of dependence on adversarial foreign sources. That is why the Department of Energy, the Department of Defense, and others have taken interest in our work: every pound of vanadium reclaimed domestically keeps critical minerals in the United States supply chain.

The core issue before this Subcommittee is how existing environmental rules treat spent refinery catalyst recycling. Congress passed the Resource Conservation and Recovery Act (“RCRA”) in 1976 with the twin goals of protecting human health and encouraging conservation and resource recovery. Under RCRA, legitimately recycled materials generally should not be treated as “waste.” Indeed, EPA guidance recognizes that certain recycling activities – including processing hazardous secondary materials for metal recovery – are exactly what RCRA is meant to encourage, not penalize. Unfortunately, the way RCRA is being interpreted to apply to spent refinery catalyst favors exporting this catalyst over recycling it domestically. That interpretation has real consequences for AMG and for the United States and its supply chains.

Let me be specific. Under Ohio’s RCRA program (as delegated under federal law), Ohio EPA has long granted AMG site-specific “variances” that allow us to operate our facilities lawfully and safely with robust control requirements to protect human health and the environment. RCRA allows Ohio EPA to issue variances that classify the spent catalyst as non-waste material being fully reclaimed, and therefore AMG is not subject to duplicative emissions requirements as both facilities have robust Clean Air Act Title V permits. EPA Region 5 has reviewed and concurred with each variance AMG has ever received.

The Ohio EPA-issued variances date back decades and have enabled the safe recycling of over 500,000 tons of spent catalyst. With these permissions in hand, AMG recently invested \$300 million to build its Zanesville plant, expecting to process and recycle spent catalyst in a consistent

regulatory framework. But after that plant began operating in 2021, EPA Region 5 staff began asserting a different view. EPA Region 5 staff concluded that the spent catalyst was not being “legitimately recycled” and thus could not benefit from the variances or other RCRA exemptions. Ohio EPA sternly disagreed with EPA Region 5 staff – leading to years of debate between EPA Region 5 staff and Ohio EPA.

In the end, and only after significant Congressional, State of Ohio, and Ohio EPA efforts, EPA Region 5 staff finally recognized they could not shut us down at that time; but they did threaten Ohio EPA that AMG’s variance would not be renewed after it expires. It is worth noting here that the ability to issue RCRA variances is fully delegated to the State of Ohio, and EPA Region 5 staff are acting contrary to cooperative federalism. In other words, after we invested hundreds of millions of dollars into the Zanesville plant under an Ohio EPA-issued variance, we are now being told, by federal EPA staff members who previously approved the Ohio EPA-issued variance, that we will not be issued another variance after 2031.

This flip-flop of interpretations illustrates the problem: key terms like “legitimate recycling” are vague, and different EPA offices may construe them differently. From AMG’s perspective, this is a battle of form over substance. Ohio EPA (with delegated authority from EPA Region 5) believes that our recycling processes are legitimate recycling, protective of health and the environment, and qualify for the RCRA variances. The Ohio EPA-issued variances include the same protections as a RCRA permit, but are specifically tailored to our operations. We treat

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emissions and waste with very high controls, including air pollution controls permitted under the Clean Air Act. Our processes are focused on recovery of valuable metals, not waste disposal. From a practical standpoint, the Zanesville and Cambridge operations produce metal products – they are not waste incinerators. Yet, the EPA Region 5 staff view would collapse that distinction and treat the spent catalyst as if it were merely some anonymous hazardous waste destined for destruction in our facilities.

The result of that approach is counterproductive and, frankly, dangerous to the United States' interests. By signaling that the metals within the spent catalyst cannot be “legitimately recycled,” EPA Region 5 staff is effectively pushing refiners to divert that material elsewhere. In the worst case, it means exporting it overseas for critical minerals recovery by foreign nations, rather than completing the recovery here at home – something that is already happening now in real time. This hands our critical minerals to foreign adversaries. It also undermines the whole purpose of the *Resource Conservation and Recovery Act* – as implemented in the variance provisions and recycling exemptions, which Congress included precisely to encourage resource recovery. If a company like AMG – which recovers critical minerals in the United States – is treated as disposing of waste, then the law is being turned against its intended beneficiaries, including the American people. In short, a rigid non-sensical reading of the law defeats the law's very intent.

We are fortunate that both Ohio’s political leadership and EPA Region 5 leadership have recognized the value of what AMG does and the accuracy of its positions. Ohio EPA leadership, Ohio’s Attorney General, and the Ohio Governor have all expressed support for our recycling operation as a critical domestic supply chain. For example, Director Logue and Attorney General Yost have formally supported clarifications to ensure spent refinery catalysts can be recycled domestically. In the same vein, EPA Region 5 Administrator Anne Vogel also supports AMG’s positions. To ensure permanence, Congress has also begun to act. Earlier this year, Representative Troy Balderson (R-OH) and Senator Jon Husted (R-OH) introduced legislation entitled the “*Spent Catalyst Recycling and Critical Minerals and Metals Recovery Act.*” Introduced in March 2026, this bill would amend RCRA to explicitly protect the safe recycling of spent petroleum catalysts for domestic critical mineral recovery. In practical terms, the bill would insert a clear statement into federal law, maintaining that spent catalysts legitimately recycled for vanadium (and other valuable minerals) are not to be regulated as hazardous waste. In the words of Congressman Balderson, this clarifies Congress’s intent so that companies like AMG “can recover critical minerals here in America” and not lose them to foreign processors. Senator Husted echoed that intent on the Senate floor. This kind of statutory fix is precisely what we need – it puts the question beyond debate, preserves both environmental safeguards and our national supply chains, and reduces the United States need to obtain critical minerals from our nation’s primary adversaries.

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To sum up: AMG Vanadium is a small company with a big national mission. Through recycling that is safe, well-regulated, and aligned with RCRA's purposes, we are reclaiming a mineral that the United States does not have as a significant natural resource. Yet the future of our operations (and the addition of potential future facilities) have been clouded by shifting interpretations of RCRA regulations that do not seem to reflect either the original statute or common sense about recycling. A modernized RCRA – through legislative amendments and clear federal rulemaking – should resolve that confusion in favor of recycling, not against it.

I respectfully urge this Committee to consider these facts: our domestic steelmakers, energy companies, and defense industries need a reliable source of vanadium, and AMG is committed to supplying it. By updating RCRA to more clearly protect domestic critical mineral recovery, Congress can simultaneously advance both environmental and security goals.