



LEWISTON, NEW YORK

2020

SUSTAINABILITY REPORT

Where Objectivity Flourishes



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Message From Our CEO

Together!

"If you want to go fast, go alone. If you want to go far, go together"
– African proverb

2020 pushed us to be physically distant but did not prevail in separating us. In the face of a global pandemic, confronted by climate change and social inequities, I am astounded and inspired by the Togetherness that has been revealed in our community of WTS Stakeholders. Together we have made significant strides on our Sustainability Journey.

The complex challenges of today require bold actions for today that will lead to an enhanced sustainability for all. How do we reimagine the challenges of today as opportunities for tomorrow? Such reimagining shifts our paradigm and challenges our status quo.

Together at WTS we reimagine waste as by-products. Throughout out this sustainability report you will obtain a snapshot of how we mine waste for value and power circular economy through taking a holistic approach to the generation and management of materials.

Together with you as our stakeholder, we reexamine long and deeply held assumptions about waste. Where is the value, can it be recycled, re-used, reclaimed? What materials would you use as inputs into your processes, into your maintenance activities, into your on-site treatment processes? In 2020 we answered these questions together and will continue to reexamine with you the opportunities to minimize waste and avoid landfill.

Together we strive to power a more circular economy. However, there stands in our way one regulatory piece that if adopted at the state level, could unleash innovation, collaboration and accelerate our progress. Contained in the new Definition of Solid Waste rule, first introduced in 2008 and since modified in both 2015 and 2018 is the regulatory framework that allows for wastes to be reclassified as Secondary Hazardous Materials eligible for reclamation as opposed to being sent for disposal. As more states adopt the entire 2018 rule we will see opportunities open up exponentially for the powering of circular economy by matching up the by-products of producers with reclaimers and manufacturing site. All of this will accelerate the reduction in hazardous waste generation while preserving natural resources.

As we all take action in every segment of society we will witness and be a part of the tangible unfolding of Sustainability: preserving the environment and creating benefits for society while delivering economic value equitably.

On behalf of all of us at WTS, thank you for continuing this journey with us in 2020. We say yes to going far Together!



MICHAEL J. WURST
CEO & PRESIDENT

Michael J. Wurst

Message From WTS' Chairman



GARY P. HALL
FOUNDER & CO-CHAIRMAN

Gary P. Hall

Looking back to 2020 and the COVID-19 pandemic, our journey to enhance to the sustainability of our stakeholders was dealt with unprecedented challenges, for example; supply chain disruptions, biohazard response protocols, remote workforce, medical emergencies, overwhelmed hospitals, quarantines and travel restrictions. What we came to realize as we worked together to overcome these challenges is that the health & safety of our families is truly important, and that we equally need to be concerned for health and well-being of our stakeholders including: first responders, medical staff, our customers, suppliers, and all the communities and neighbors that we touch with our operations and services.

WTS' Annual Sustainability Report highlights how our professional network came together to address our customer requirements and hazmat response challenges without service disruptions. We reached out to local hospitals to share our knowledge and expertise deploying our established systems and procedures that guide us during chemical emergencies. As a token of our gratitude for those providing front line relief services, WTS sent meals to hospitals and shelters to help care for their children while they performed their remarkable care for those infected.

Understanding what is truly important to our stakeholders, we continued our support and sponsorship for community activities, charities and organizations. Throughout the pandemic, WTS has continued to partner with EduNations, supporting the medical clinic and school system servicing children in Sierra Leone, West Africa. The medical clinic, that was created to address the Ebola Crisis, transitioned to COVID testing. I was proud to lead WTS' charge to raise \$75,000 to catch the cure for cystic fibrosis with the virtual 2020 Lower Niagara Annual Steelhead Challenge fishing tournament to benefit the Cystic Fibrosis Foundation. Finally, our support also continues for the Ralph C. Wilson, Jr. Niagara Community Center, which continues to service, with our support, over 15,000 youth in various sports activities, all safely for the physical and mental well-being of the youth on our community throughout the pandemic. I am grateful to all of our stakeholders, including our employees who continued to service a number of our customers who played a key role in the manufacturing of chemicals and products essential in the COVID relief efforts. WTS, as an Essential Business continues to demonstrate its resilience during these challenging times. All of our Teams continue to Work Together to create a sustainable future for society.

About WTS

WTS is a place where customer focused teams collaborate, objectively and responsibly, to deploy game changing solutions and technologies that enhance the sustainability of our stakeholders . WTS does not own transport, storage, and disposal Facilities. We are not looking to dispose of customer waste in our landfills, incinerators or treatment facilities.

Simply put, **WTS does not own any of these assets and this is the foundation of our objectivity.**

As one of the largest non-asset, truly objective material management service providers, WTS offers a network of experienced environmental professionals and business partners who are collectively creating value with sustainable material management solutions. Over its 39-year history, WTS has effectively addressed customer challenges and needs using a systematic by-product management process that seeks to find value with the management of hazardous and non-hazardous chemical by-products, including regulated waste, discarded consumer goods and packaging. With access to the largest independent network of treatment and disposal facilities, recyclers, chemical distributors, specialty chemical manufacturers and tollers, WTS responsibly delivers material management service solutions addressing high priority sustainability objectives focused on waste and by-products.

Our process, rooted in **Responsible Care®**, takes an objective approach as we seek to deploy sustainable materials management solutions in which by-products and discarded materials are directly reused, re-purposed, reclaimed for commercial reuse, beneficially reused and recycled to eliminate waste while reducing environmental impacts and conserving facility resources.

Vision

A place where customer-focused teams collaborate objectively and responsibly to deploy game changing solutions and technologies that enhance the sustainability of our stakeholders.



Sustainability Mission

Play a key role in powering a circular, sustainable economy, in which by-products and materials are reclaimed and cycled to eliminate waste while reducing environmental impacts and conserving resources.



WTS' Corporate Office in Lewiston, NY



Service Strategies Enhancing Stakeholder Sustainability

WTS has established three strategies to enhance the sustainability of our stakeholders:

- ◆ Responsible By-Product, Waste Management Material Management services designed to support customers with logistics/transportation, regulatory compliance, on-site environmental services, landfill diversion, recycling programs, beneficial reuse and responsible disposal of regulated waste that cannot be reused or recycled.
- ◆ Sustainable Materials Management (SMM), the WTS process designed to use and reuse materials more productively over their entire product lifecycle by objectively evaluating material inputs and outputs, and responsibly connecting producers and end-users of discarded products and by-products, thus increasing circularity. Our SMM service solutions are designed to address material properties and composition, at their points of origin, while bridging logistic infrastructure in a manner that will create value.
- ◆ Powering a Circular Economy through the responsible use of chemicals, innovative technologies and facility resources. Our systematic approach rethinks material inputs and outputs along the supply chain and product life cycle, and in the process unlocks value from by-products and wasted resources.

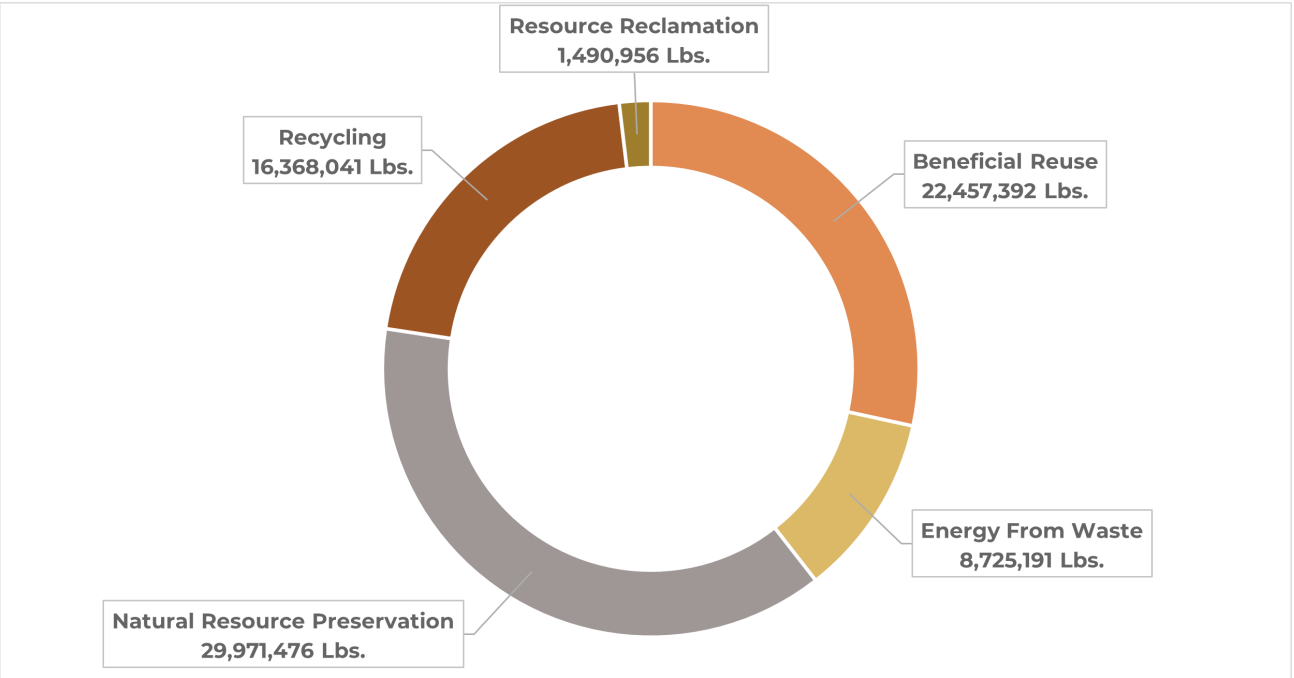


Our services are being employed by large and small businesses representing a number of manufacturing, chemical production and warehouse operations.

Contributions to Stakeholder Sustainability

51% of the total pounds of material managed by WTS in 2020 involved members of the American Chemistry Council (ACC).

With offices in several regions of the United States, WTS’ employees are servicing customers throughout the country. Working Together, our integrated network of business and technology partners as well as our experienced employees, including chemists, engineers, environmental personnel and administrative professionals are, objectively and responsibly, creating value by enhancing the sustainability of our stakeholders.

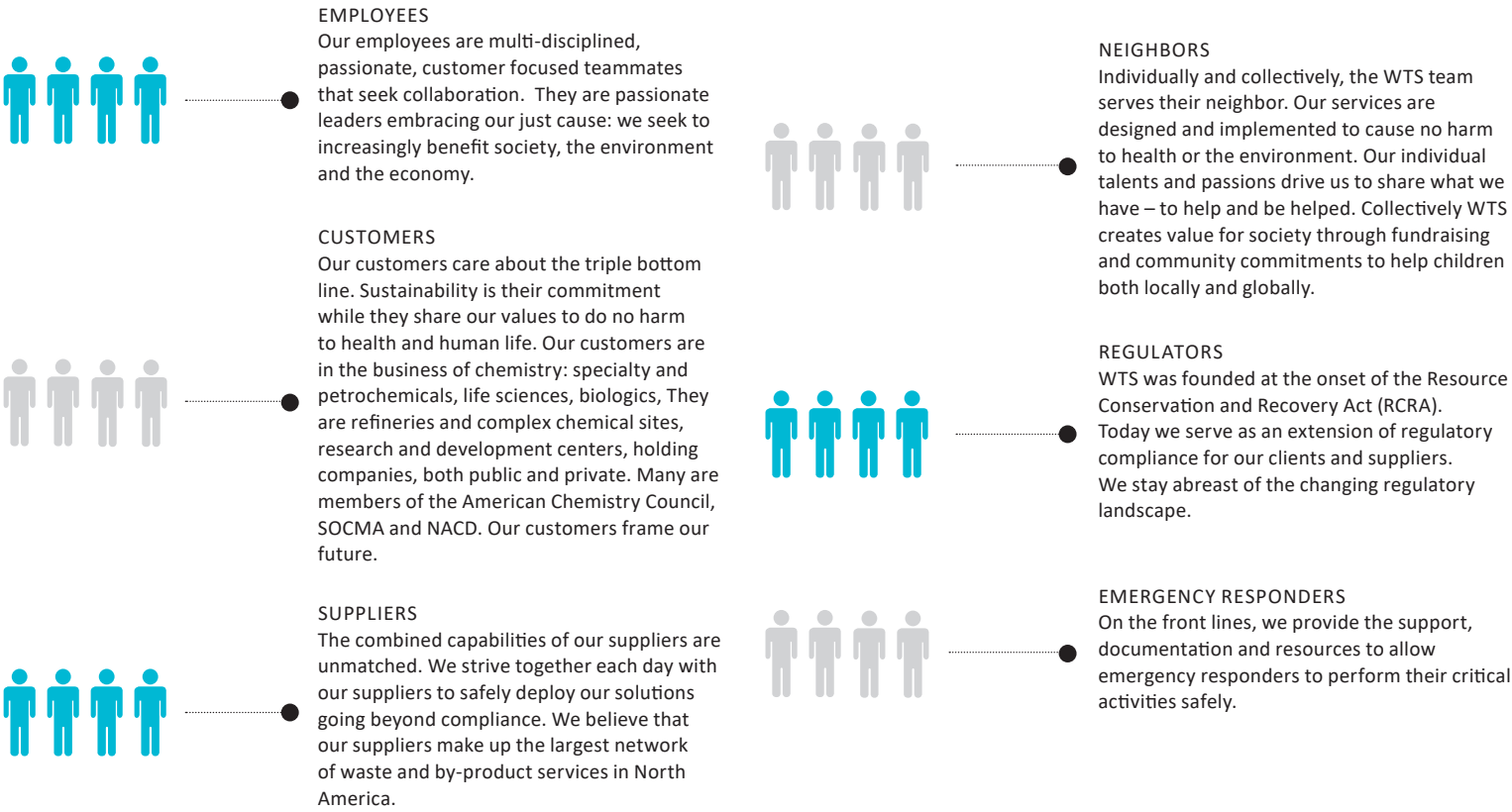


79,013,055 lbs
Managed in 2020 using Sustainable Solutions

Enhancing the Sustainability of Our Stakeholders

In 2020, WTS continued to demonstrate its ability to enhance the sustainability of its stakeholders by promoting chemistry, the science behind our sustainable solutions. Our business strategies all play a key role in powering a circular economy while ensuring each business solution is aligned with safe, secure and sustainable chemistry.

Our stakeholders:



WTS established goals that are helping our stakeholders enable a sustainable future:

Sustainable Practices



WTS supports chemical manufacturers who are responsible for the impacts of their products and operations. To support this responsibility, WTS undertakes stringent practices to protect human health and the environment which continue to be verified by independent auditors and supported by data reported through Responsible Care®.

Healthy Climate



In 2020, WTS continued to examine and develop new services promoting renewable energy sources and chemical-based products that support the global fight against climate change while safeguarding the environment.

Reimagining Resources



WTS aligns its goals with the American Chemistry Council (ACC) and its members in support of their pursuit of a more circular economy. Our efforts demonstrated progress in prioritizing resource conservation and efficiencies as well as material management innovations that enable direct reuse, recycling and recovery solutions resulting in greater value from materials that have traditionally been discarded.

WTS Goals

Affiliations



American Chemistry Council

In 2020, WTS continued its affiliation as a Responsible Care® Partner Company in good standing with the American Chemistry Council. The American Chemistry Council (ACC) is America's oldest trade association of its kind, representing more than 190 companies engaged in the business of chemistry – an innovative economic growth engine that is helping solve the biggest challenges facing our country and the world. ACC members are the leading companies engaged in all aspects of the business of chemistry, from the largest corporations to the smallest, and everything in between. More than 96 percent of all manufactured goods rely on the business of chemistry. The \$553 billion chemistry business in American supports more than 25 percent of the U.S. domestic product, and 14 percent of the world's chemicals.



National Association of Chemical Distributors

WTS participated in 2020 as an affiliate member of the National Association of Chemical Distributors (NACD). The NACD is an international association of chemical distributors and their supply chain partners. Member companies process, formulate, blend, re-package, warehouse, transport and market chemical products. A member-voted condition of membership in the association is a signed commitment to NACD Responsible Distribution®. Responsible Distribution is NACD's mandatory, third-party verified environmental, health, safety and security program where members demonstrate their commitment to continuous performance improvement in every phase of chemical storage, handling, transportation and disposal. Responsible Distribution® is aligned with Responsible Care® via a formal Memorandum of Understanding between the American Chemistry Council (ACC) and NACD that outlines a mutual intent to "promote performance excellence, best practice sharing and cooperation along the value chain, embodied by their respective Responsible Care® and Responsible Distribution Initiatives."



Society of Chemical Manufacturers and Affiliates



In 2020, WTS, Inc. continued to participate as an affiliate member of the Society of Chemical Manufacturers and Affiliates (SOCMA). As an international trade association, SOCMA represents the interests of the batch, custom and specialty chemical industry. Specialty chemical manufacturers are categorized as: tollers, custom chemical producers and proprietary chemical producers all of which play a key role across the global chemical supply chain. SOCMA is taking a leading role in compliance and stewardship by providing technical expertise, best practice sharing and training, all enabling members to contribute to a safe, sustainable and productive economy.



ACC Awards

At the 2020 Responsible Care® & Sustainability Conference

, the American Chemistry Council (ACC) honored WTS, Inc. with the following two awards:

- WTS was named the 2020 Responsible Care® Partner of the Year for our exceptional environmental, health, safety and security (EHS+S) performance in 2020. This was the 7th time WTS has received this prestigious recognition.
- WTS and LANXESS Corporation's joint project was awarded the Waste Minimization Reuse and Recycling Award by providing innovative beneficial reuse solutions via the company's sustainable solutions initiatives.

ACC's Responsible Care® Awards Program recognizes chemical industry leaders that have made an exceptional commitment to EHS+S performance, sustainability and sound chemicals management. Safe chemicals management doesn't end when a chemical product leaves the manufacturing facility. That's why ACC extends the Responsible Care® ethic and management practices across the chemical supply chain through its Responsible Care® Partner Program.

WTS, like other [Responsible Care® Partners](#) collect and annually report performance data in the following areas:

- Employee, product and process safety
- Chemical supply chain security
- Product stewardship, including managing product safety and product communications
- Environment
- Energy
- Accountability through management system certification
- Community Outreach



Chemistry : The Science Behind Sustainability



CHEMISTRY:
The Science Behind
Sustainability

In 2020, WTS continued its commitments to advance safe, innovative, effective, and economically viable chemical products and technologies that are key to unlocking sustainability solutions.

In alignment with the American Chemistry Council commitments, WTS

- Promoted the safe use of chemicals based on hazards, risks and exposures.
- Addressed the environmental impacts of its operations and services focused on the conservation of materials and resources, and reducing waste through reuse and recycling.
- Went beyond regulatory requirements to manage, monitor and report our progress through our Responsible Care Management System®.
- Continued to collaborate with our stakeholders to fulfill our on-going commitments to sustainability.

In alignment with the ACC Sustainability Priorities, WTS continued to promote its strategies to enhance the sustainability of its stakeholders by engaging in service solutions resulting in:

- Reduction of greenhouse gas emissions
- Efficient use of energy
- A more circular economy that prioritizes resource conservation and efficiency, reuse, recycling and recovery technologies that can capture the greatest value from materials that have been traditionally discarded. In this regard WTS continues to track our progress toward a circular economy by reporting on the use of natural resources as well as the reuse, repurposing, recycling and recovery of the value locked in material traditionally viewed as waste.

ACC Sustainability

During the 2010-2020 timeframe, WTS has helped members of the American Chemistry Council divert over **one billion pounds** of materials from landfills and thermal destruction (without energy recovery) through our sustainable service solutions broken down as follows:



Beneficial Reuse

Innovative reuse of by-products and/or co-products that are economically and environmentally beneficial.

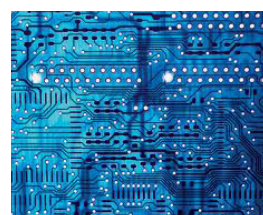
951.81 million lbs



Natural Resource Preservation

The act of preserving resources by substituting alternative technologies to expressly continue sustainable use.

328.03 million lbs



Recycling

The act of processing by-products and/or co-products into new products to prevent waste of potentially useful materials.

134.58 million lbs



Energy From Waste

The process of creating energy in the form of electricity or heat from the thermal application of organic by-products.

91.37 million lbs



Resource Reclamation

The act of reclaiming resources from by-products and/or co-products that can be processed into a product of value.

22.74 million lbs

Stewardship Rooted in Responsible Care®

In 2020, WTS' Responsible Care Management System® continued to be the centerpiece of our company's commitments to sustainability as well as the development of material management solutions for discarded materials, by-products and regulated wastes.

“RCMS® is the roadmap for all of our current and future endeavors”



BRIAN BURNS
DIRECTOR OF RESPONSIBLE CARE®

WTS' third party certified Responsible Care Management System® (RCMS®) Manual defines the structure of the management system employed by WTS, Inc. to effectively manage, in a manner consistent with its RCMS® Policy, the significant environmentally, health and safety, security and quality (EHSS&Q) aspects that are related to its business activities and industrial as well as hazardous chemical management services, including:

- Disposal
- Recycling
- Resale/Reuse
- Transportation
- Field Services
- Supply Distribution
- Compliance

WTS' Executive Management established the WTS RCMS® Policy as a means of promoting the organization's 'Goal Zero' commitment to providing quality services that are protective of human health and safety and the environment. 'Goal Zero' commits to zero fines, zero penalties, zero compliance actions, zero insurance claims and zero safety incidents.

As a partner in good standing in the American Chemistry Council's Responsible Care® Program, WTS is committed to excellence in all of our business activities. We have adopted and we continue to strive to adhere to the following guiding principles to achieve our goals:

Health & Safety & Security – WTS continues to provide a safe, secure and healthy work environment for all employees, stakeholders and others working on our behalf. WTS will continue to protect and safeguard the communities in which we work.

Compliance – WTS complies with all applicable federal, state and local environmental health, safety and security regulations, as well as the Responsible Care® Guiding Principles and other relevant Responsible Care® program requirements.

Quality – WTS provides our customers with the highest quality of services while protecting the integrity of the environment.

Pollution Prevention – WTS operates its business in an environmentally responsible manner and offers services that stress environmental stewardship, sustainability, pollution prevention and that minimize the impact on the communities in which we work.

Continual Improvement – WTS operates our business in accordance with a well-defined Responsible Care® Management Plan.

Communication – WTS continues to communicate all applicable job responsibilities and business performance information with all employees in a manner that fosters and enables their successful participation in our business management system and the achievement of our goals.

Ethics – By our words and deeds, WTS strives to conduct our business in a manner that is consistent with these commitments.

RCMS® Policy - Our Values



WTS is committed to evaluating the effectiveness of its EHS&S communications with external stakeholders and assessing & considering the RCMS® related views of its external stakeholders. The RCMS® Team is responsible for maintaining the following systems designed to assess stakeholder perspectives of WTS' performance:

- Annual customer satisfaction surveys.
- Annual satisfaction surveys of core/critical contractors & suppliers.

Results of these surveys and other RCMS® related external communications are reported to the RCMS® Management Representative to assure appropriate follow-up. Non-conformances and opportunities for improvement are managed within the RCMS® Corrective Action system. WTS also communicates information related to the company's EHSS&Q risks, performance and requirements with its customers, contractors, suppliers and other stakeholders.

WTS also communicates its values and commitment to RCMS® via regularly posted WTS Newsletters to its stakeholders. The newsletters typically include industry and regulatory updates as well as information regarding WTS's RCMS®.

In accordance with one of our core values, Communication, WTS launched its [Learning Center](#) to communicate regulatory updates and references, encompassing a number of topics, for example:

- Difference between RCRA Empty and DOT Empty Containers
- Recycling Aerosols
- e-Manifest updates
- Training requirements for generators
- Hazardous Waste Minimization
- PPE Disposal during Covid
- Hazardous Waste Generators Improvement Rule
- Manifest requirements for rejected hazardous waste shipments
- PFAS Waste Management



Stakeholder Communication

Responsible Care Management System®

WTS’ third-party certified Responsible Care® Management System (RCMS®) Manual defines the structure of the management system employed by WTS, Inc. to effectively manage, in a manner consistent with its RCMS® Policy, the significant environmental, health and safety, security and quality (EHSS&Q) aspects that are related to its business activities and services related.

RCMS® Performance Indicators

Within the framework of WTS’ RCMS®, the following key RCMS® Performance Indicators are monitored and reported by our RCMS® Team.

- Environmental Performance Indicators
- Health and Safety Performance Indicators
- Security Performance Indicators
- Quality Performance Indicators: other RCMS® related metrics as may be required by ACC to be reported on the ACC website.

Our RCMS® Team routinely monitors these Key RCMS® Performance Indicators and provides our Executive Management with summaries of the organization’s RCMS® performance during Management Reviews.

RCMS® Annual Report

Among the highlights and accomplishments published in our 2020 RCMS® Annual Report are:

- Goal Zero Standard met - zero injuries, zero fines, zero compliance actions and zero insurance claims.
- Underwent and passed our Recertification Audit
- Honored by the ACC as the Responsible Care® Partner Company of the Year
- Closed objectives addressing:
 - o E-Signatures Process for Profiles
 - o Implemented a Sustainable Materials Management Task Force
 - o Published 2019 Annual Sustainability Report
- Opened new objective to monitor/track company actions addressing COVID-19
- Utilized Corrective Action Program as Opportunities for improvement
- Submitted ACC metrics
- Conducted Annual Client Survey
- Scope of RCMS® updated
- Updated process to identify risks associated with all WTS operations
- Pandemic Preparedness Protocol distributed
- Updated Approved Supplier Program, and in the process developed a remote review survey
- Conducted virtual annual regulatory training for all employees

General EM Practices at All WTS Facility Locations

In 2020, WTS continued to address the procedures documented in the company’s RCMS® dealing with general environmental practices at all WTS Facility Locations. These procedures focused on:

- Natural Resource Conservation, with emphasis on:
 - o Natural Gas
 - o Electricity
 - o Water
 - o Motor Vehicle Fuel
- Responsible Waste Management encompassing wastes categorized as:
 - o Trash
 - o Recyclables
 - o Universal Waste
 - o Electronic Wastes
 - o Hazardous Wastes
 - o Motor Vehicle Related Waste
 - o First Aid & Medical Wastes
- Water Emissions
- Air Emissions



In 2020, WTS maintained records for approved suppliers, classified as:

- TSDRs
- Contractors
- Hazardous Waste Transporters
- Non-Hazardous Wasted Transporters
- Product Materials Transporters
- SMM End-Users
- Laboratories

Supplier Management Program

WTS utilizes a network of suppliers and contractors for client service fulfillment, EHS&S Risks associated with these activities are controlled through WTS’ Supplier Management program via the RCMS® Operational Controls.

- Management of Change Procedure
- RCMS® Security Procedures
- USDOT Hazardous Materials Security Plan
- Qualification Program for Critical Suppliers
- EHSS Performance Requirements for On-Site Contractors
- Customer Transactions: Routine T&D, Recycle/Distribution of By-Products, Co-Products and Virgin Chemicals
- General Safe Work Practices for all WTS Work Locations
- Subcontractor Management at Customer Locations

In 2020, WTS completed 313 surveillance reviews while updating its pre-qualified network of 490+ suppliers.

Supplier Management Program

Health & Safety Program

WTS' Corporate Health and Safety Procedures (WTS HASP) continues to support the company's RCMS® and facilitate the effective management of the health and safety risks associated with its activities.

The WTS HASP's are comprised of a series of documented health and safety procedures developed and maintained by the WTS EHS&S Manager. The WTS HASP's are applicable to the following WTS facilities and activities:

- WTS Administration and Sales Activities
- WTS Activities at Project Sites
- Contractor Activities at WTS Offices
- Contractor Activities at Project Sites
- Site Projects subject to OSHA Hazardous Waste Operations and Emergency Response (HazWoper) Regulations



TOM DOBMEIER
EHS&S Manager

“We prioritize the health and safety of our stakeholders and highly value getting our employees home safe and healthy”

In 2020, WTS continued to address requirements for:

- 19 General Health and Safety Plans
- 37 Field Services Health and Safety plans and forms
- 56 Health and Safety plans reviewed annually
- Annual training for field services health and safety plans
- Annual training for workplace sexual harassment prevention plan



Health and Safety Third Party Verification

In 2020, WTS had 12 clients connected with ISNetworld. The ISNetworld process works as follows:

Collect - Contractors and suppliers submit information into ISNetworld based on regulation and hiring client requirements.

Verify - ISN's Review and Verification Services (RAVS) Team reviews self-reported information against regulatory and/or hiring client requirements.

Connect - Hiring Clients can source contractors and suppliers in ISNetworld that meet their requirements, providing the potential to grow your business and improve workplace safety.

In 2020, WTS received RAV Plus Verification from ISNetworld which required the auditing of several of our clients. WTS had A Grades in ISNetworld for all of the company's connected clients. In conjunction with this grade, WTS submitted:

- Health and Safety policies for review by ISNetworld.
- Health and Safety statistics annually
- Insurance certificates for 2 of our clients
- Training documents for review of WTS' Health and Safety Training

Health & Safety Manual Procedures

Responsible Care Beyond the Fenceline

In 2020, WTS maintained its commitments to responsibly manage regulated hazardous and non-hazardous wastes generated by our customer's warehouse and chemical distribution operations. These operations required an array of services provided by WTS' network of environmental professionals, all of which represented WTS' Essential Workforce.



With each project, WTS' Essential Workforce deployed by-product management solutions that delivered beyond compliance RCRA performance, operation efficiencies and sustainability enhancements. Our integrated service solutions addressed:

- Slow moving goods
- Obsolete/expired products
- Damaged inventory
- Off-grade product and chemical materials
- Discarded inventory and packaging
- Regulated hazardous and nonhazardous waste

WTS' integrated services included:

- RCRA Compliance Gap Analysis
- Rapid Response to Urgent Conditions
- Emergency Response
- On-site services focused on:
 - o Compliant packaging
 - o Shipment preparation
 - o Shipment documentation such as profiles, manifests, labels, marks and scheduling material logistics
- Compliance audits
- Online logistics materials management tracking and reporting

Case Study - Warehouse Cleanout Project

WTS conformed with workplace health and safety requirements dictated with a major warehouse cleanout project. This project involved the following integrated services:

- Assimilated 55 new waste/material profiles
- Nine facilities requiring 10 professional experts for packing
- 360,384 pounds of material packed
 - o 351 drums
 - o 187 pallets of products
 - o 55 cubic yard bags/boxes
 - o 1 roll-off box
- 23 loads shipped offsite after overcoming challenges dealing with truck availability and delivery slots
- Negotiating with a pre-qualified network of suppliers
- Completing invoicing and project documentation



Working Together to Address Covid-19 Challenges

The WTS Team Worked Together as an Essential Critical Infrastructure

as defined by the U.S. Department of Homeland Security. WTS is joining together with our Stakeholders to slow the spread of COVID-19. From the outset, WTS continued to service our stakeholders without disruption while taking positive measures to remain safe.

WTS was proud to provide services to several essential manufactures whose activities were are critical to the fight against COVID-19. Our activities supported the manufacturing of vaccines, testing equipment, and disinfectants.

COVID-19 Case Study - Rapid Facility Decon/Disinfectant Services

A WTS customer had requested a COVID-19 cleanup as a result of a positive confirmation of an employee with the virus. The first site needed of be cleaned up by 2 AM, with multiple sites on their research campus, and the decontamination had to be completed by 6 AM.

WTS' partner was on site within 1.5 hours and decontamination was completed over the next 6 hours. Following CDC Guidelines the facility and areas of concern were safely disinfected. WTS provided this service on an expedited basis at manufacturing sites, office complexes, control rooms, clean rooms and R&D labs.

During the first year of the pandemic, WTS successfully completed COVID-19 decontamination/cleanup activities 18 times throughout the country for this customer.



Case Study - Commuter Railroad

On-Site Environmental Services

To ensure compliance during the pandemic, WTS provided an array of environmental services to a major commuter railroad that encompassed the responsible management of hazardous and nonhazardous waste streams. These waste streams were generated in various yards throughout the railroad's system where trains and equipment are routinely repaired. Waste services were also aligned with construction projects and spill clean-ups occurring along Right of Ways as well as passenger platforms.

There was a short period during the early phase of the pandemic when no personnel were allowed onsite. To ensure compliance WTS implemented a process allowing waste inventories to be monitored remotely. WTS was able to resume waste shipments, without environmental issues, and in conformance with PPE requirements and health/safety standards governing contractors, drivers and on-site laborers.



Working Remotely

As essential workers, all of WTS' employees dealt with the new challenges created by COVID-19. Our workforce had to adapt to a remote work environment while balancing our efforts to work together on activities enhancing the sustainability of our stakeholders



Our TSR Team had to address customer expectations and service requirements while dealing with the challenges at home, for example:

- Teaching their children
- Watching children and keeping a healthy and safe environment for the entire family
- Becoming more productive with time management and the employment of new visual tools enhancing communication with co-workers
- Using new technologies and programs while working remotely
- Participating in remote Team Huddles covering performance expectations and progress meeting the company's goals

Technology & Program Investment:

Enhancing Communication & EHS Performance

To ensure customer service and communications were not disrupted in the shift to working from home WTS, Inc. ramped up usage of Microsoft Teams, Internet-based IP Phones and DocuSign, which allowed WTS to send material profiles electronically to customers for their signature in a manner that resulted in reduced time and expense.

Technology & Program Investments

- Document Tracker – This system enhancement allowed customer invoices to be scanned remotely while backfilling all transaction data and information into the company's LMWts database for all transactions. All employees, with different roles and responsibilities have access to this system. WTS' electronic file system created a number of benefits aligned with our sustainability commitments, for example:
 - o Paper use eliminated
 - o Supporting documentation required with independent audits.
 - o Auditors have access to all information tracked with invoices.
 - o Paper invoices and copies of backup eliminated.

In April 2020, WTS had to close access to the company's corporate offices in Lewiston, NY per the Governor's pandemic orders. WTS' operations remained open, even though access to our offices was closed to our employees.

During the pandemic, WTS personnel still needed to exchange resources amongst the company's teams. Our solution, aligned with our logistic strengths and IT expertise, was to create new paperless systems and when necessary also establishing an company run delivery service to pick up and drop off resources, while all employees remained safely at home without disruption to WTS serving our stakeholders.



Sustainable Accomplishments While Working Together Remotely

- The company's RCMS® Audit was conducted virtually for the first time. All interviews were conducted virtually and all access to the company's RCMS® systems were done remotely and virtually with the auditor.
- All remote employees remained safe during the transitional period and throughout the pandemic.
- The Document Tracker proved to be a valuable tool for all employees working remotely or in the office, and it continues to support activities designed to enhance the sustainability of stakeholders.
- The virtual communication systems allowed us to support customer service requests while ensuring compliance and conformance with the company's Goal Zero.
- Services to customers along with documentation of regulated transactions and preparation of invoices were delivered at steady levels without disruption.
- Supplier relationships and payments remained steady while striving for enhancements to the sustainability performance of all stakeholders.

Sustainable Materials Management

From By-Product to Feedstock

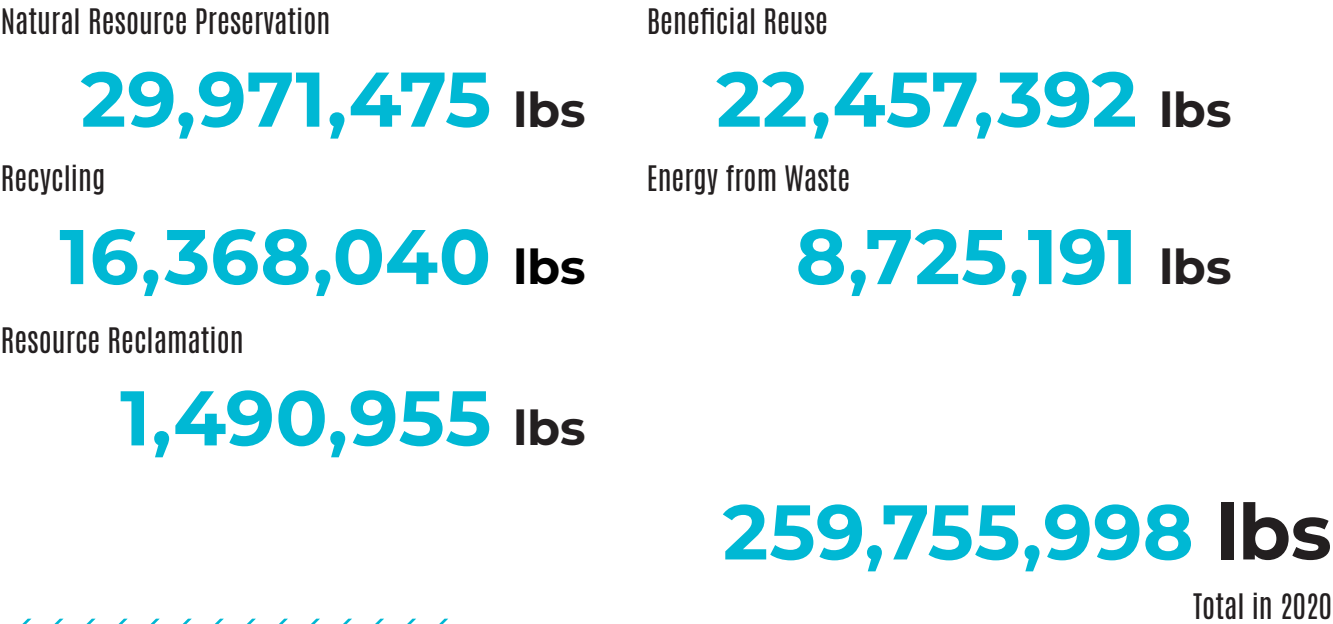
Within the scope of WTS’ RCMS®, Sustainable Materials Management (SMM) is the WTS process designed to use and reuse materials more productively over their entire product lifecycle by evaluating manufacturing inputs and outputs, and responsibly connecting producers and end-users of by-products and products, thus increasing circularity.

- Our SMM service solutions aligned with the following program objectives:
- DIRECT REUSE** – direct reuse/sale of slow moving or outdated as well as unused, damaged and slightly off specification chemical products, by-products and categorical materials
 - RECLAIM** – reclaim/recover by-products as supplemental or strategic raw material ingredients
 - REDUCE** – reduce, minimize or eliminate discarded chemical by-products and materials for end of life management

WTS views SMM as a precursor to the circularity of chemicals and materials discarded throughout the supply chain. Our SMM initiatives are creating value with an array of chemical categories, including but not limited to: solvents, chemical production by-products, acids, caustic, maintenance chemicals, metals, catalysts, plastics, resins, adhesives, and organic/inorganic chemicals.



In 2020, WTS managed approximately **30.4%** of all waste transaction quantities using **SMM strategies**, broken down as follow:



Exiting RCRA in Support of the Circular Economy

Where Objectivity Flourishes

At WTS, we pride ourselves on going beyond compliance in all of our business transactions. A major facet of that is a thorough understanding of the regulatory framework in which we operate. We couple that with our independent view in order to offer our clients the best solutions for managing their waste and byproducts.

WTS’ SMM Task Force continues its efforts to directly reuse hazardous materials, eliminating hazardous waste governed by RCRA. Our environmental Managers continue to consult with our customers on viable strategies exempting waste from RCRA.

Case Study - Circular Solution for Caustic By- Product

The Challenge:

A WTS client (a specialty chemical manufacturer) produces a versatile chemical product with multiple applications that are essential in the production of several important chemicals, polymer foams as well as a precursor to polymerization catalysts, pharmaceuticals, and agrochemicals. The custom manufacturing of this versatile chemical product requires the addition of caustic to maintain alkalinity in the production reactions. A caustic by-product is generated with a soluble concentration of the versatile chemical product. The properties and composition of the by-product required the manufacturer to manage the by-product as a hazardous waste stream, subject to costly destruction/disposal technology.

The Solution:

In collaboration with the chemical producer, WTS examined the manufacturing operations to ascertain the feasibility of modifying the process to create a caustic co-product. The process modifications addressed the removal of the soluble content of the versatile chemical product contamination by chemical oxidation. The resulting caustic co-product was staged in bulk as a recovered raw material with an average composition of 40% caustic, 60% water.

In collaboration with the chemical producer and WTS' network of customers, WTS examined viable circular chemical solutions for the caustic co-product. WTS' systematic approach involved connecting the producer with end-use manufacturers who could accept and use the bulk quantities of recovered caustic as a raw material, supplementing end-user requirements for the purchase of virgin caustic formulations. In addition to confirming quality of the caustic co-product, WTS collaborated with the end-user to address any requirements for off-loading the caustic co-product in alignment with procedures that were in-place for virgin caustic purchases. WTS also collaborated with facility engineers to ensure the caustic co-product achieved the required treatment performance with the facility's process water and wastewater treatment operations.

The collaborative process factored in logistic service solutions ensuring responsible management of bulk caustic transactions and the safe handling of the caustic co-product by the producer as well as the end-user facility.

The Results:

The operational changes and the systematic approach to rethinking material inputs and outputs resulted in a circular solution for the caustic by-product. In 2020, the producer was able to ship out six bulk loads of recovered caustic to a manufacturer who directly reused the caustic formulation in the plant's water and wastewater treatment operations to ensure water quality for production as well as to address requirements for pH adjustment of treated wastewaters requiring discharge and environmental reuse. **In total, 239,145 pounds of the recovered caustic co-product were directly used by the plant. This quantity of caustic co-product provided the end-user with environmental and economic benefits by ensuring compliance with wastewater discharges and minimizing the need to purchase and use virgin caustic, thereby reducing the embedded emissions in their supply chain. For the chemical producer, this circular solution, eliminated the generation of a RCRA hazardous waste along with all relevant operating expenditures associated with ensuring proper handling, transport and destruction.** By modifying the production flow and reacting the caustic by-product to eliminate the soluble concentrations of the versatile chemical product, the plant eliminated a hazardous waste and minimized environmental and safety hazards associated with in-plant handling and storage. The changes in the process resulted in a salable co-product that can be directly reused as a supplemental raw material.

The circular chemical solution aligns with sustainability commitments of the producer and end-user, and furthers WTS' goal of enhancing the sustainability of its stakeholders.



Responsible Management of Discarded Materials & Waste

In 2020, WTS responsibly managed 259,755,998 pounds of regulated and non-regulated hazardous and non-hazardous wastes, **30.4%** of which was handled with sustainable strategies. These transactions were managed by WTS personnel in alignment with our RCMS and our commitments to GoalZero. WTS' RCMS® policy was established as a means of promoting the company's GoalZero commitment to providing quality that are protective of human health, safety, and the environment. Goal Zero commits to zero fines, zero penalties, zero compliance actions, zero insurance claims and zero safety incidents with all services managed by WTS.



“WTS’s commitment to Responsible Care® and its Management System drives WTS to be absolute compliant. Compliance is the basis of all our programs. There are no exceptions.”



MICHAEL C. OLIVER
CO-CHAIRMAN

17,776

Transactions

249+

Client Locations

Supplier Network

490+

259,755,998 lbs

Managed in 2020

WTS' services were employed with various by-product origins, including but not limited to; Manufacturing and chemical processing facilities, R&D operations, Warehouse/Distribution Centers, Industrial Cleaning/Maintenance Operations, utility operations, and remediation Projects.

In 2020, WTS continued to responsibly manage our logistics and end-use supplier network for regulated hazardous and nonhazardous wastes. Our logistics network included prequalified transporters of waste by truck, rail, barge, air, LTL, and UPS. Our pre-approved network of end-use suppliers provided commercial services, such as; high temperature incineration, waste to energy, solvent reclamation, fuel blending, wastewater treatment, chemical reuse, recycling and land disposal.

Circularity in Infrastructure

With an increased societal focus on infrastructure development, WTS remains committed to advancing circularity in infrastructure by finding value in discarded materials, including recyclable commodities and diverting discarded material to commercial outlets, including cement kilns, to be used as auxiliary feed stocks and in fuels blending.

In 2020, WTS sent **29,971,475** lbs. of material to cement kilns and fuels blending programs.

WTS is committed to converting industrial waste including production by-products, construction debris and plastics, into reusable resources within the waste recycling infrastructure, that includes facilities that collect, sort and process recyclable materials, turn organics/green waste into compost or fuels, or use recycled materials in manufacturing and a sustainable product portfolio.

WTS continues its efforts to help businesses promote a circular economy by leveraging our customer relationships and supplier network to create a more circular supply chain. Our business model is designed to connect and objectively collaborate with its customers and end-users, applying innovative technologies and sustainable material management solutions that require a different way of thinking regarding the efficient use and management of material inputs and outputs.

WTS' By-Product Management Process is the catalyst of our objectivity and our Responsible Care Management System® aligns with our GOAL ZERO:

Zero Superfund Actions, Zero Fines, Zero Penalties and Zero Safety Incidents.

Promoting State Adoption of Solid Waste Definition

As we strive to power a more circular economy as stakeholders together, there stands in our way one regulatory piece that if adopted at the state level, could unleash innovation, collaboration and accelerate our progress.

WTS continues to promote state adoption of the 2018 new Definition of Solid Waste Rule that is intended to promote responsible recycling by allowing wastes to be reclassified as secondary Hazardous Materials eligible for reclamation as opposed to being sent to landfill. The framework is in-place to reclaim materials as usable product, reducing waste, conserving natural resources , saving energy, and reducing costs. Under RCRA, individual states with RCRA authorized programs need to adopt the rule to increase opportunities for:

- Manufacturers to offer their materials for reclamation
- Manufacturers to receive a material that they are able to process and use in their process
- Powering a circular economy by matching up producers and reclaimers in states that adopted the Solid Waste Rule
- Reducing Generation of Regulated Waste while conserving natural resources
- Creating relief with Supply Chain, and
- Improving Operational Efficiencies and Cost Savings

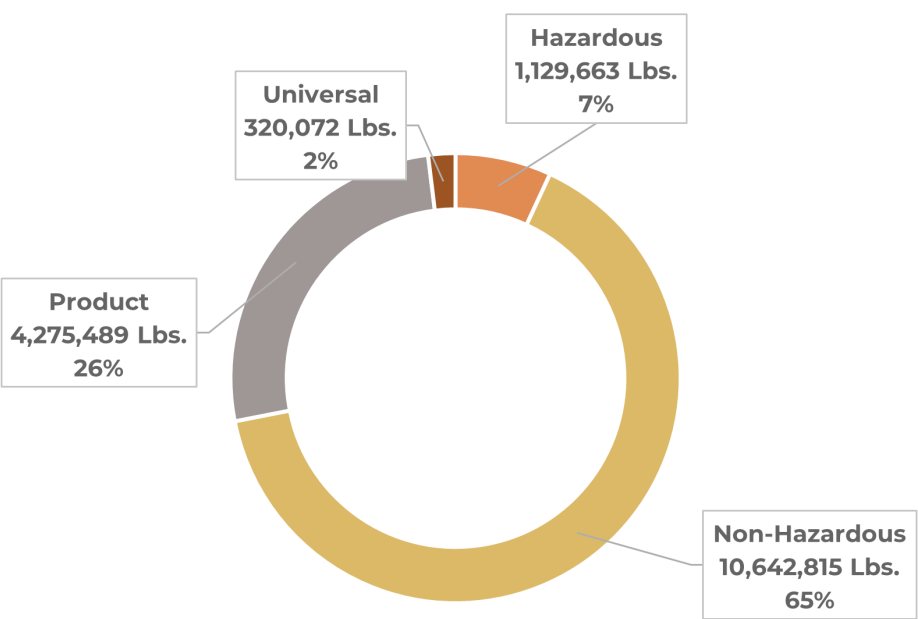


Optimized Recycling

WTS continued its efforts to support businesses with their efforts to attain zero waste to landfill status and sustainability goals by optimizing on-site and commercial recycling solutions. In 2020, WTS managed recycling transactions for over 16,368,000 pounds of materials. WTS’ recycling activities encompass hazardous, non-hazardous, and universal wastes as well as off-spec and discarded chemical inventory, products, recyclable packaging, and consumer goods. WTS has established a pre-qualified network of suppliers facilities and technologies that are capable recovering value from recyclable materials.

WTS’ supplier network includes facilities that can collect and mechanically sort and process non-hazardous recyclables for commercial reuse, including but not limited coated paper, cardboard, wood, pallets, glass, empty containers and plastics. WTS is committed to expanding our supplier network to account for innovative technologies that can repurpose discarded materials as supplemental feedstock. In this regard, WTS continues to examine developments involving chemical recycling for various categories of discarded plastics.

Materials Recycled (2020)



Managing Recyclables at a Manufacturing Campus

In 2020, WTS serviced a major consumer goods manufacturer with a large campus of manufacturing buildings, warehouses, maintenance, utility, administrative operations and a centralized Material Recycling Center. The Material Recycling Center allowed for sorting and staging of recyclable commodities as well as the baling of commodities to enhance transport and commercial reuse.



WTS provided a dedicated team of professionals in support all waste activities within the campus, including handling and accumulation practices that influenced the value derived from the recycling of discarded resources. Some examples of the materials managed by WTS for commercial recovery and recycling are summarized as follow;

Description	Tons
Corrugated, Mixed Paper & Office Paper	2,106
Plastic	302
Wood Pallets, Boxes & Bracing	802
LR's	400
Ink Jet Paper	570
Coated Edge Trim	645
Coated Paper	1,165
Ferrous & Non-Ferrous	3,189
WWT Sludge for Silver Recovery	436
Batteries (Lead-Acid & Alkaline)	227
WWT Sludge	4,700
Universale Waste & E-Waste	5
Drums (Metal & Plastic)	129
Concrete	72
Asphalt	500



E-Waste / Universal Waste



Recycling Electronic Scrap is one of the many ways we work to power a more circular economy and enhance the sustainability of our stakeholders. There are many environmental benefits of recycling E-Waste. One of the most obvious benefits is limiting the amount of material that ends up in landfill. Many electronic devices contain toxic substances, such as lead, mercury, cadmium, beryllium, polyvinyl chloride and chromium. If tossed into landfills, these toxic substances could leach into the soil and pollute the groundwater and air. In addition, improperly handled E-Waste typically impacts less-advantaged communities more often, or the electronics end up going into dumps overseas. By recycling E-Waste we can ensure they are disposed of safely and properly.

Another benefit of recycling electronics is the preservation of natural resources. Re-using the valuable raw materials of electronics takes pressure off demand for mined materials, in particular virgin precious metals. Mining precious metals can be very toxic and environmentally detrimental and re-using these valuable materials preserves our natural resources for future generations. Furthermore, using recycled materials consumes less water and energy when producing new goods. This lowers production costs by avoiding the need to manufacture goods from scratch.

Another benefit of recycling E-Waste is that it is safe and properly removes data from devices. Recycling facilities have the ability to shred, destroy or otherwise remove data from your old electronics. If electronics are not responsibly recycled, it could leave your data available or susceptible to getting in the hands of the wrong people. Going through a certified recycler to properly destroy your electronics keeps the data safe and ensures that it is destroyed properly

In 2020, WTS and our customers & partners recycled nearly 1.7 MM pounds of electronic scrap, resulting in the following environmental benefits:

- 2,369,614 lbs of GHG Emissions Reduced
 - 48,881 lbs of Toxic Metals Recovered
 - 47,460 lbs of lead
 - 0.17 lbs of mercury
 - 1,410 lbs of arsenic
 - 11.01 lbs of cadmium
- 574,128 lbs total (Metals)
 - 75,104 lbs copper
 - 43 lbs of gold
 - 3.32 lbs of platinum
 - 17.5 lbs of palladium
 - 34.792 lbs of aluminum
 - 464,168 lbs of steel

Profiling, Tracking and Reporting

In 2020, our Essential Workforce maintained the company's LMwts software system for custom tracking and reporting of material profile and outbound transactions with preapproved suppliers.

Through December 15, 2020 over 8110 shipping documents were created in our LMwts system with a total of 17,965 lines on these shipping documents.

WTS' LMwts database includes over 12,570 active profiles with over 1,400 new profiles created in 2020.

Over 360,800 manifested containers were documented and tracked as outbound shipments.

These container transactions included:

- 1283 bags
- 275,119 containers of fiber
- 5,887 containers of metal
- 23,201 wood boxes, cartons
- 81 cylinders
- 30,355 fiber drums
- 17,552 metal drums
- 742 dump trucks
- 4,490 portal tanks
- 2,130 tanker trucks



Overall Metrics / By-Product Management

Community Outreach

As part of our community outreach WTS supported

- Sponsored a Little League Team at Whirlpool Park Niagara Falls
- Opportunities Unlimited of Niagara - Golf Raffle
- Leukemia & Lymphoma Society of WNY – Light the Night Walk sponsor
- Summit Life Outreach Center
- Mt St Mary's Hospital Foundation
- Variety – the Children's Charity
- Niagara County SPCA
- St Ann's Catholic Church
- The First Tee of WNY
- Nativity Miguel Middle School
- Niagara Falls Firefighters
- Cystic Fibrosis Foundation
- North Bailey Fire Company in Tonawanda



Community Support During COVID-19

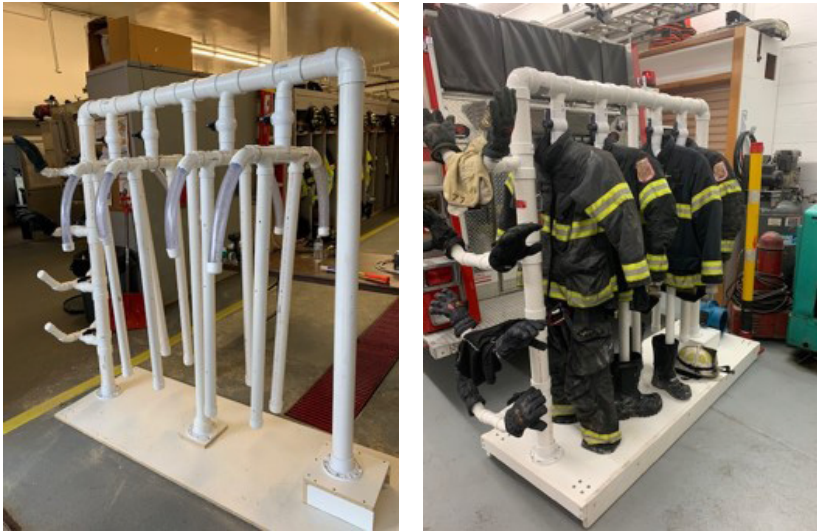
In May of 2020, WTS donated boxed lunches to the following organizations:

- Niagara Falls Boys & Girls Club – 50 individual lunches
- Mt St Mary's Hospital – 80 individual lunches
- Niagara Falls Memorial Medical Center – 100 individual lunches
- Heart Love & Soul Soup Kitchen – 150 individual lunches



Supporting a Local Volunteer Fire Department

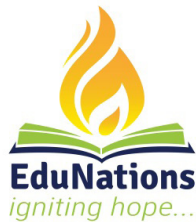
WTS’ support facilitated the purchase and assembly of a gear dryer, which allows firefighters to wash and dry their gear in a few hours instead of a few days. This dryer saves them from having to use their older spare gear after washing, and prevents steam burns that can occur when firefighters go to a fire in wet or damp gear.



Additionally, the department was able to upgrade its washer to a larger model with steam capabilities, allowing firefighters to more easily sanitize their gear and washable items after going on call, thus helping prevent department members from being infected by COVID or other infectious diseases. WTS’ support allowed the department to purchase several boxes of N-95 style masks and nitrile gloves, which was very helpful since their demand for PPE increased because of the pandemic.

EduNations Medical Clinic - COVID-19

EduNations is devoted to building schools to make education free and accessible to children who otherwise would not receive one. WTS continued to support the unified EduNations K-12 school system and the creation of a medical clinic in remote regions of Sierra Leone, West Africa. Prior to the pandemic, the medical clinic helped combat Ebola but transitioned to support COVID 19 testing and aid for the locals.



Virtual Fishing Tournament

Gary Hall , co-founder and Chairman at WTS led the charge to raise \$75,000 to catch the cure for Cystic Fibrosis in the 2020 lower Niagara Annual Steelhead fishing tournament to benefit the Cystic Fibrosis Foundation. Due to COVID-19, the challenge was held virtually and paid tribute to Gary Ellis, who passed away earlier in 2020. Since its inception, the tournament has raised more than \$1 million to catch the cure for cystic fibrosis.

Community Outreach



Ralph C. Wilson, Jr. Niagara Community Center



The principal activity of the Ralph C. Wilson, Jr. Niagara Community Center is to promote the social welfare of the Niagara Falls community through an indoor sports and education facility that serves the community center. The facility provides a location for collaborative groups such as high schools, Niagara Falls Boys & Girls Club, Niagara PAL, and other not-for-profit organizations. WTS provided staffing prior to the community center closing for the year. While the center was closed due to COVID-19, repairs and upgrades for the future took place.

