



LEWISTON, NEW YORK

2021

SUSTAINABILITY REPORT

Where Objectivity Flourishes



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Message From Our CEO

Future Focused - Actionable Today

Whenever I have the opportunity to gather our WTS team, we strive to frame our topics in the context of being future focused, yet actionable today. **As we stand back to reflect on our WTS Sustainability Journey and report on our progress for 2021, we realize we have yet to reach our destination. The reality is there is much more in front of us than behind us.**

The journey can be overwhelming at times. We could wonder when will we get there, are we truly making an impact? The WTS Team continues to remain future focused and actionable today.

Unpacking this a little more, I think about the many quests that we undertake with our customers and supplier partners. The quest is often framed as follows, “I generate this hazardous waste stream, help me minimize or move to zero waste.” There represents a big gap (sometimes a canyon) between hazardous waste generation and the waste minimization vision presented. The solution is often a multi-step one with concurrent activities over multiple years.

Reviewing one of our case studies further illustrates what is possible. Over two million lbs. of material were being generated and compliantly transferred off-site for hazardous waste incineration. How do we exit RCRA? Is there a way to power circular economy? Not at first...however step by step in collaboration with our client, together we arrived.

As a first step, we obtained the necessary approvals to begin managing the materials into a fuels/waste to energy program. This created an incremental sustainability benefit and cost savings. Concurrently, the material was qualified, and a portion of the stream was managed off-site in a Solvent Recovery Process. Here again, another sustainability enhancement and additional cost savings.

In parallel, our regulatory team evaluated all the available RCRA exclusions and their applicability to this material. Our waste process experts worked with the site to identify ways to split the material between what was considered “dirty” flush material and “clean” flush material. The clean flush material was segregated, containerized and a responsible end use market was developed for direct re-use of the material. The daunting became a reality, direct re-use of the material, eliminating the hazardous waste generation and turning an expense into a revenue.

In our circle of influence, this is sustainability: preserving the environment and creating benefits for society while delivering economic value equitably.

On behalf of all of us at WTS, thank you to all of our Stakeholders. We are beyond grateful for your true partnership!



MICHAEL J. WURST
CEO & PRESIDENT

Message From WTS' Chairman



GARY P. HALL
FOUNDER & CO-CHAIRMAN

As I reflect back on 2021, I cannot help but think how proud I am of my WTS teammates in maintaining the values we espouse in our WTS Quality and Responsible Care® Policy Statement during these turbulent times.

Our team never wavered in the face of unprecedented industry challenges and continued to deliver beyond compliant services as we worked with our clients and partners on their respective sustainability journeys. Now, as WTS celebrates its 40th year, our commitment remains even stronger. We will continue to use our Responsible Care® Management System as the framework for our Sustainability mission. I am also so pleased to be able to report that we also continued our support for the Sustainability of our community Stakeholders by maintaining our philanthropic efforts with amongst others: The Cystic Fibrosis Foundation, The Ralph C Wilson Niagara Community Center, EduNations in Sierra Leone with school day meals, Heart Love and soul, a food pantry and social service mission in Niagara Falls, and Cartagena Paws – a charitable organization that provides meals and educational activities for children to promote animal rights and welfare in Cartagena, Columbia.

I believe that the Sustainability Mission of WTS goes beyond protecting and preserving our natural resources with our people, our partners and all of our stakeholders.

We strive to help those less fortunate as well. Thank you to all of our stakeholders for allowing us to continue this mission and we look forward to partnering with all of you for many years to come.

Our Story

As a certified Responsible Care® Partner Company, WTS, Inc. is one of the largest “non-asset” providers of by-product management services specializing in the re-marketing and direct reuse of unused chemicals and packaging as well as the objective and responsible management of regulated waste for beneficial reuse, recycling, treatment and disposal.

With our corporate offices in Lewiston, New York, WTS has built a reputation over the last 40 years of solving complex environmental and waste challenges with an established team of professionals and a pre-qualified network of suppliers and business partners creating value with our sustainable solutions.

Objectivity Creates Value

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.

Contributions to Stakeholder Sustainability

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

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.

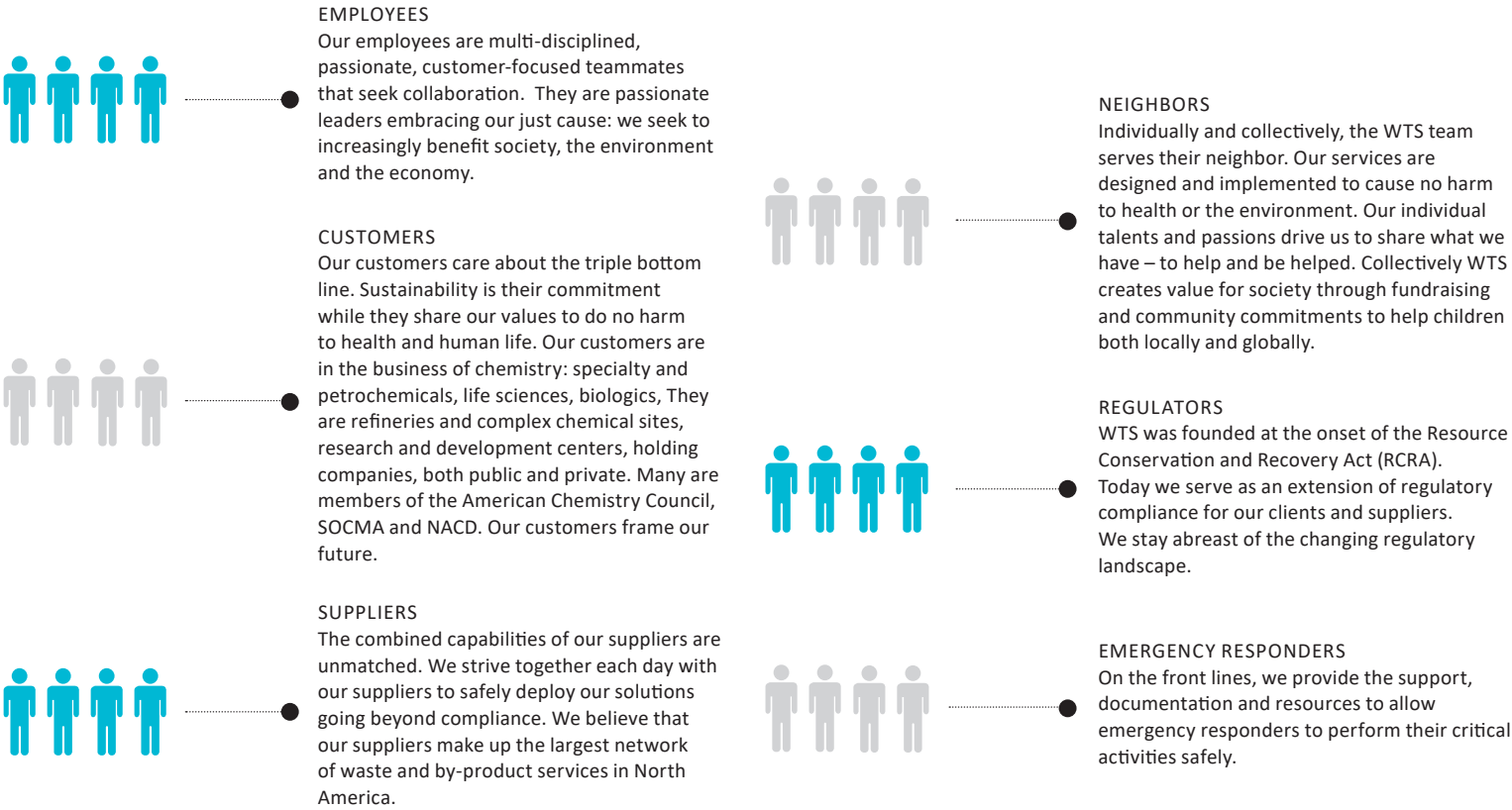


Enhancing the Sustainability of Our Stakeholders

WTS' business model is designed to enhance the sustainability performance of our stakeholders by:

- Taking a systems approach to managing discarded chemicals, by-products and regulated waste, including industrial wastewaters and recyclables, in alignment with our Responsible Care® Management System, American Chemistry Council sustainability commitments as well as our customers' goals and expectations for improving their sustainability performance.
- Reimagining and implementing Sustainable Materials Management (SMM) processes designed to directly use and reuse materials more productively over their lifecycle by evaluating material inputs and outputs as well as responsibly connecting producers and end-users of products and by-products, thus increasing their circularity.
- Deploying game-changing technologies and processes to extract value from discarded resources while minimizing risks posed by multi-media chemical releases

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 2021, 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

WTS’ executive Management has established WTS’ RCMS® Policy as a means of promoting the organization’s “GOAL ZERO” commitment to providing quality services that are protective of human health & safety and the environment.



Our Core Values

GOAL ZERO commits to zero fines, zero penalties, zero compliance actions, zero insurance claims and zero safety incidents.



Our Guiding Principles, described with our RCMS® Policy, continue to provide the framework for the establishment and maintenance of the RCMS and our on-going performance improvement initiatives.

WTS, Inc is a leading provider of quality environmental services specializing in by-product management and logistics services. As a Responsible Care® Partner Company, in good standing in the American Chemistry Council’s Responsible Care® Program, our company is committed to excellence in all our business endeavors. WTS has adopted and continues to strive to adhere to the following Guiding Principles in order to achieve our goals, including enhancing the sustainability of our stakeholders.

WTS’ Quality and Responsible Care® Policy Statement

Health & Safety & Security

WTS provides a safe, secure and healthy work environment for all employees, stakeholders and others working on our behalf, including protecting and safeguarding the communities in which we work. **SAFETY WILL ALWAYS BE A CORE VALUE OF WTS**

Compliance

WTS demonstrates its compliance 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 its customers with the highest quality of services while protecting the integrity of the environment.

Pollution Prevention

WTS operates our business in an environmentally responsible manner and continues to offer 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, the elements of which routinely evaluate our performance and guide us as we strive for continual improvement.

Communication

WTS communicates applicable job responsibilities and business performance information with all employees in a manner that fosters and enables their successful participation in communicating our core values with our external stakeholders.

Ethics

WTS, by our words and deeds, conducts our business in a manner that is consistent with these commitments.



WTS’ Quality & Responsible Care® Policy Statement

Affiliations



American Chemistry Council

In 2021, 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 America 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 2021 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 2021, 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.



A Responsible Care® Partner Company

WTS, Inc. Is a Responsible Care® Partner Company that conforms with the American Chemistry Council's Responsible Care® Program.

For more than 30 years, the American Chemistry Council's Responsible Care® Program has been, and continues to be, a leading Environmental, Health, Safety and security (EHS&S) program in the chemical industry. The American Chemistry Council extends the Responsible Care® ethic and management practices across the chemical supply chain through its Responsible Care® Partner Program. By committing to Responsible Care® and its key principles, Responsible Care® Partner companies extend the program's core ethic beyond traditional chemical manufacturing sites.

WTS' conformance to the Technical Specification RC101.04 has been independently certified with its scope encompassing all Responsible Care® and EHS&S activities associated with non-asset objective providers of by-product management services to the chemical industry. The Responsible Care® "Hands and Molecule" logo is recognized across the chemical industry as a commitment to EHS&S values and performance as demonstrated through the fulfillment of program obligations, including submission of an annual metrics log and third-party certification audits.



RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY

Stewardship Rooted in Responsible Care®

In 2021, 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

ACC Awards



At the 2022 American Chemistry Council Annual Responsible Care® & Sustainability Conference, WTS was awarded one of the 2022 Responsible Care® Partner Companies of the Year for its 2021 performance and accomplishments. This is the 8th year that WTS has received this prestigious award for our efforts, superb performance and safety record involving the distribution, transportation, storage, use, treatment, disposal and marketing/sales of chemicals.

Over the last twelve years, WTS has received several accolades and awards recognizing the company’s Waste Minimization accomplishments, Environmental Leadership and EHS&S Performance.

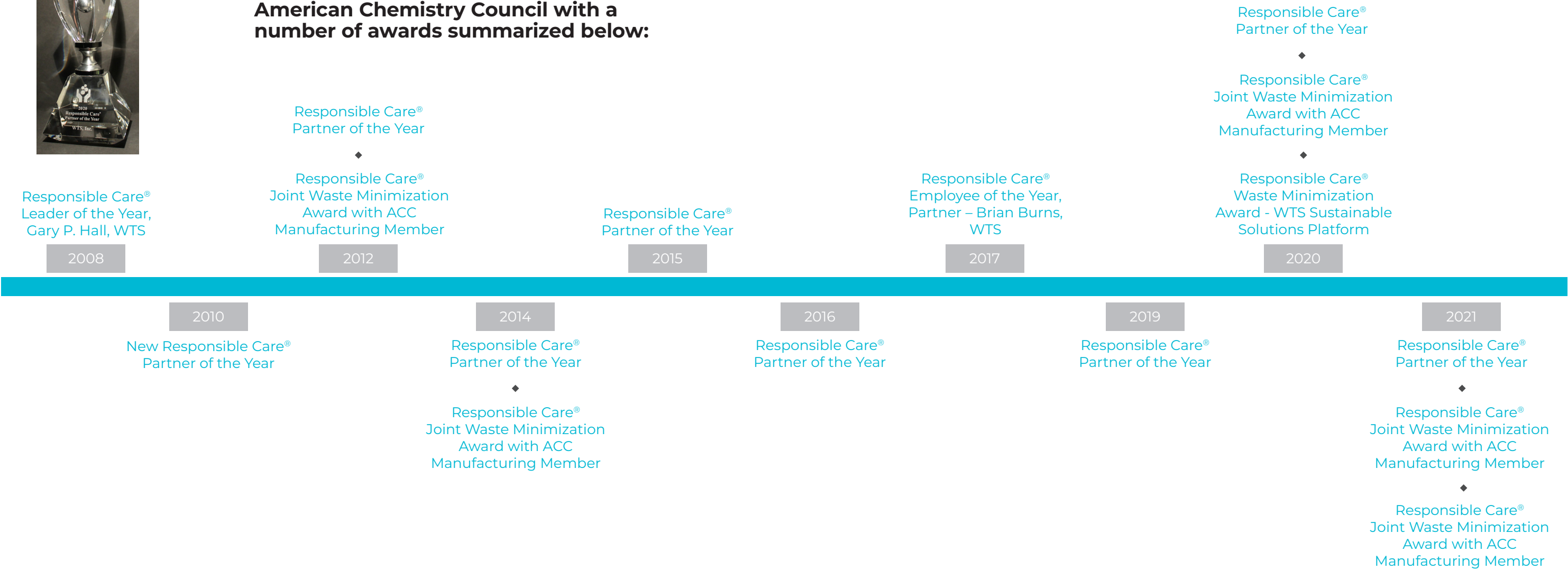
WTS, Inc has been recognized by the American Chemistry Council with a number of awards summarized below:

WTS, Inc. recognizes the chemical industry as a complex and important part of our global economy and supply chain network. With several hundreds of thousand of chemicals and chemical mixtures in use globally, the chemical industry supplies key ingredients for greater than 95% of products manufactured, including:

- Specialty chemicals
- Agricultural chemicals
- Basic Chemicals
- Pharmaceuticals, and
- Consumer Products

WTS, along with the American Chemistry Council, identifies chemistry as essential to our economy as it plays a vital role in the creation of ground-breaking products that make our lives and our world heathier, safer, more sustainable and productive.

Critical Role of Chemistry for a Circular Economy

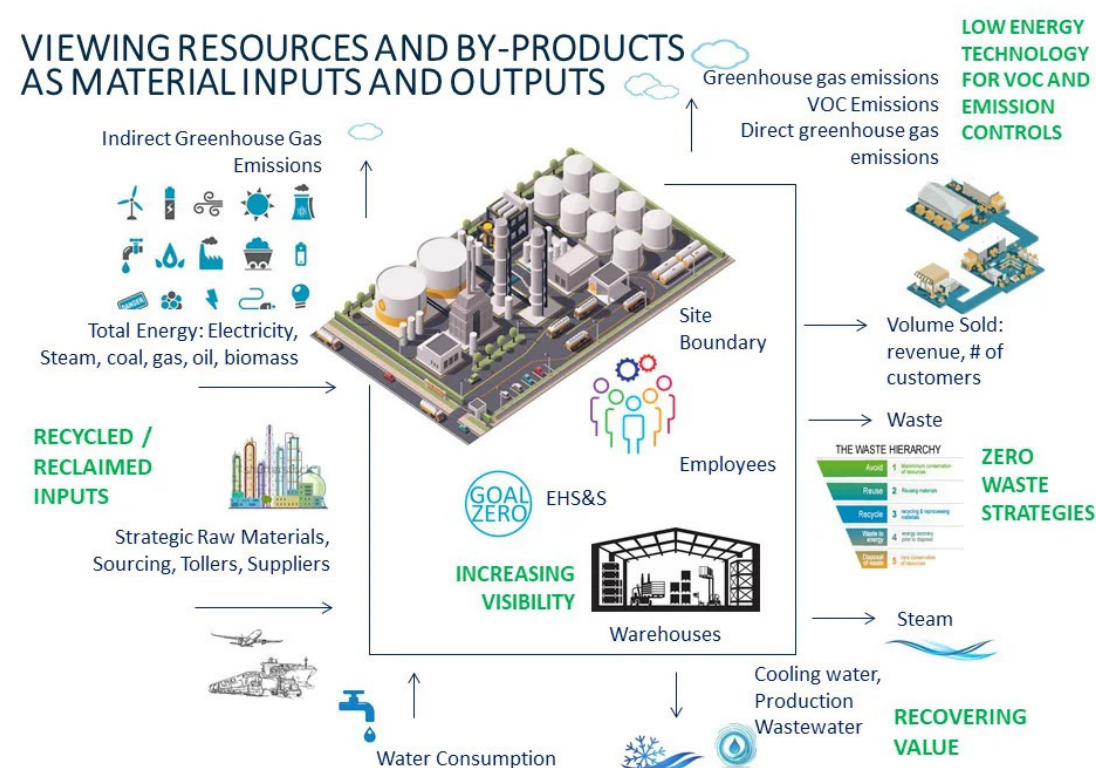


Pursuing a Circular Economy

The Linear Economy approach - TAKE, MAKE, USE and WASTE – is unsustainable. This approach results in discarded quantities of waste, depleted resources, production inefficiencies and lost profits as well as environmental and social risks.

A Circular Economy reduces material use, designing materials and products to be less resource-intensive while recapturing waste as resources to manufacture raw materials and goods.

In alignment with the chemical industry, WTS is committed to playing a key role in the systematic transition to a Circular Economy, in which resources and materials are continuously cycled to eliminate waste, while creating value for all.



In pursuit of our company vision, WTS continues to demonstrate progress toward a circular economy by responsibly using natural resources and managing the reuse, repurposing, recycling and recovery of the value locked in discarded materials, traditionally viewed as waste. Our Sustainable Materials Management services result in direct reuse solutions for discarded hazardous and non-hazardous chemicals and chemical by-products.

Chemistry for Sustainability

WTS, in alignment with the American Chemistry Council (ACC) and its members, believes chemistry plays an integral role in solving our world's sustainability challenges. WTS is committed to advancing safe, innovative, effective, and economically viable chemical products and technologies that are key to unlocking sustainability solutions.

WTS' Executive team continues to support the following ACC' sustainability commitments:

- Promoting the safe use of chemicals, informed sustainability decision-making and accelerated innovation
- Addressing environmental impacts of our operations and products, including conserving materials and resources, and reducing waste through re-use and recycling
- Going beyond regulatory requirements to manage, monitor and report progress through Responsible Care®, which includes:
 - Systems to improve chemical safety
 - Third-party certification of practices and systems, and
 - Transparent reporting of results
- Collaborating with others to fulfill our commitments to sustainability

WTS' Responsible Care® Management System is the centerpiece of our commitment to sustainability as well as the development of safe and innovative technologies and service solutions designed to effectively manage unused chemicals and chemical by-products and regulated waste. Our company continues to align its RCMS® and sustainability commitments with the following ACC commitments to sustainability goals.

- Healthy Climate
- Safe Chemistry
- Quality of Life
- Clean Water and Sustainable Practices

Sustainability Priorities

WTS continues to work to enhance the sustainability of our stakeholders. Our services and growth strategies take into account the following sustainability priorities, cited by the American Chemistry Council:

Climate

- Climate change is recognized as a global challenge that needs long-term commitment and action by every segment of society.
- WTS is working together with our stakeholders to support efforts to reduce greenhouse gas (GHG) emissions and energy use by promoting emissions-reducing service solutions and sharing our progress through Responsible Care®.

Water

- WTS is supporting stakeholder efforts using chemistry to advance water conservation, water reuse and the treatment of wastewater to enable clean water and the preservation of drinking water sources where WTS and customers operate.

Circularity

- In alignment with our company's mission, WTS is committed to playing a key role in the systematic transition to a circular economy and sustainable development, in which resources and materials are continuously cycled to eliminate waste, while create creating value for all.
- WTS is tracking progress toward a circular economy by not only documenting the responsible use of natural resources, but also enabling the reuse, repurposing, recycling and recovery of the value locked in materials traditionally viewed as waste.

Product Safety & Innovation

- In alignment with our RCMS®, WTS is committed to supporting the safety of our stakeholders by providing information about potential hazards and risks associated with manufactured products.
- WTS continues to support efforts to advance sustainability by incorporating product safety assessments focused on the identification of hazards and potential risks about the chemical ingredients in products.

Sustainable Materials Management (SMM)



Sustainable Materials Management (SMM) is the WTS process designed to use and reuse materials more productively over their product life cycle by objectively evaluating material inputs and outputs, and responsibly connecting producers and end-users of chemical products and by-products, thus increasing circularity.

Reuse – direct reuse/sale of slow-moving or outdated, damaged and slightly off-specification chemical products, by-products, commodities, and packaging

Reclaim – reclaim/recover by-products as supplemental raw material ingredients

Reduce – reduce, minimize or eliminate discarded chemical by-products and materials for end-of-life management

Our SMM service solutions address material properties and composition at their points of origin, while bridging logistic infrastructure in a manner that creates value.

In 2021, WTS continued the growth of our Sustainable Materials Management services and our systematic process for evaluating and qualifying viable opportunities for re-marketing and selling discarded chemicals and materials for direct reuse, re-purpose, beneficial reuse, and reclaim with our pre-qualified network of chemical/material end-users, including:

- Chemical producers, specialty chemical processors and manufacturers of consumer goods
- Chemical distributors affiliated with the National Association of Chemical Distributors
- Warehouse distribution and logistics centers
- Chemical tollers and solvent reclamation facilities
- Suppliers specializing in coprocessing as well as the recovery, repurposing and recycling of regulated solid waste and discarded commodities, including plastic scrap

SMM Inquiry Portal & Website

WTS launched our updated Sustainable Materials Management (SMM) Inquiry Portal that is designed to start our collaboration and evaluation of information and data profiling excess, unused, off-spec, and slow-moving/obsolete and expired chemical raw materials as well as chemical by-products. Once the information is entered through our Inquiry Portal, WTS' team of SMM professionals begins our systematic process to evaluate and qualify viable chemicals and materials for direct reuse, re-purpose, beneficial reuse, reclaim and secondary sales with our pre-qualified network of chemical/material end users.

In 2021 we also listed materials available for re-use on the WTS website. Additionally we utilized with an NACD affiliated e-commerce tool to remarket various chemical products to vetted end users.

The reintroduction of materials back into the marketplace, that otherwise would have been treated or disposed of, is key to WTS' approach to enhancing stakeholder sustainability. Our non-asset objective approach allows us to prioritize end users, distributors, and recyclers/reclaimers whenever possible to find the most cost-effective (or revenue generating) sustainable option rather than being tied to disposal assets. In addition to the case studies on the pages that follow, WTS facilitated the beneficial reuse of several chemical products and materials in 2021, including:

- 1.5 million lbs. of aqua ammonia
- 255k lbs. of cement/mortar compounds
- 449k lbs. of hydrogen peroxide
- 84k lbs. of dodecyl benzene sulfonic acid



Direct Reuse of Discarded Solvents as Raw Materials

The following are examples of cases where WTS' objective approach yielded sustainability benefits for our stakeholders.

Direct Reuse of High Purity Solvents

WTS, in partnership with our clients, regularly facilitates the direct reuse of a variety of solvents via our extensive network of distributors and end users. In 2021, WTS collaborated with a client at three of their locations for direct reuse of **1,730,685 lbs.** of by-product solvents.

- Cyclohexanone
- IPA
- N-butyl Acetate
- Methyl Isobutyl Carbinol
- IPA
- NMP

WTS found a buyer for these materials in our extensive network of chemical distributors. The distributor sells this material as an alternative to virgin material under the Guiding Principles of NACD's Responsible Distribution® program. Furthermore, they are vetted as part of WTS' Responsible Care® Management System, so our client can be confident that the transaction is being carried out to the highest safety standards. In so doing our client avoids waste and generates revenue while the buyer adds reused solvents to their product lines, thereby avoiding the embedded emissions that would've been caused by the production of new virgin material.

Ethanol Recycling

Our process yields results for smaller quantities as well. In 2021 a WTS client had 12,000 lbs. of 20% ethanol requiring a sustainable solution. WTS, Inc. had prequalified an ethanol recycler, as many clients had excess hand sanitizer in the wake of the COVID-19 pandemic. WTS was able to connect our client with this recycler, handling all sampling and logistics. The material was approved for recycling at the supplier and was kept out of landfill.

SMM - Case Studies

Silver Recycling

A WTS Client generates raw film negatives in gaylord boxes and Silver Sludge from their coating process. These ongoing byproducts required a sustainable solution. Another two sites generate silver flake.

Solution: WTS partnered with recyclers and reclaimers capable of handling all three byproducts, avoiding treatment/disposal and generating recycling revenue for our client.

In 2021 we managed the recycling and reclamation of:

- **66,075 lbs of raw film**
- **68,921 lbs of silver sludge**
- **7,582 lbs of silver flake**



SMM - Case Studies

The Challenge:

Over forty-two thousand pounds of Methyl Isobutyl Ketone (MIBK) were earmarked for disposal as part of the decommissioning of a chemical manufacturing process at a client site.

The Solution:

WTS, in collaboration with our client, was able to identify and implement a direct reuse for the MIBK as part of a solvent blend that is utilized in the paint manufacturing and coating industry. The MIBK was shipped offsite as a saleable product.

By partnering with WTS, our client was able to access a network of over 470 service suppliers to identify the most sustainable reuse application for this surplus chemical. Our comprehensive auditing and risk minimization processes, in addition to the end user due diligence required by our customer, ensured that all aspects of product stewardship were addressed.

The Results:

Resource Preservation - 42,700 pounds of Methyl Isobutyl Ketone were used as a product vs. disposal.

Environmental Stewardship - Thermal destruction of the MIBK as a hazardous waste would have resulted in the generation of approximately 112,460 pounds of Carbon Dioxide. The reuse alternative offset these emissions.

Value Added – The reuse of this product resulted in added value of over \$7,000 vs. the expense of disposal. In addition, this excess product is not recorded as part of the annual waste generation of the site, resulting in less scrutiny from regulatory agencies.

At the 2022 ACC Responsible Care® and Sustainability conference, WTS and a major manufacturing member were acknowledged with a joint waste minimization award for this initiative.

Exiting RCRA in Support of the Circular Economy

The Challenge:

A WTS client produces a versatile chemical product, the manufacturing of which requires the addition of caustic to maintain alkalinity in the production reactions. A caustic by-product generated with a soluble concentration of the product had to be managed as a hazardous waste stream, subject to costly destruction/disposal technology.

The Solution:

WTS examined our client's manufacturing operations to ascertain the feasibility of modifying the process to create a caustic co-product by removing the soluble content of the 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.

WTS then connected our client 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. WTS confirmed product quality and collaborated with the end-user to address product handling requirements. WTS also collaborated with facility engineers to ensure that 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:

In 2021, the producer shipped 207,000 pounds of recovered caustic to a manufacturer who directly reused it in their water and wastewater treatment operations, minimizing the need for virgin caustic, reducing the embedded emissions in their supply chain.

Our client avoided the generation of a RCRA hazardous waste along with the associated handling, transport and destruction expenditures through the creation of a salable co-product that was directly reused.

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

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 stakeholders the best solutions for managing their unused chemicals as well as discarded wastes and by-products.



WTS continues its process to monitor the effectiveness of its RCMS® by:

- Identifying and monitoring appropriate key characteristics that serve as indicators of EHSS&Q performance
- Periodically analyzing trends in these EHSS&Q key characteristics
- Properly maintaining and calibrating any equipment used to monitor or measure critical EHSS&Q performance
- Monitoring EHSS&Q performance of contractors and vendors
- Monitoring EHSS&Q performance of reuse customers, and
- Maintaining records related to the RCMS® Monitoring and Measurement activities

In 2021, WTS' RCMS® Team continued to track, analyze and report the following Key RCMS® Performance Indicators:

- Environmental Performance Indicators, including any regulatory violations, spills and releases caused by WTS employees or WTS Suppliers, contractors and/or transporters while at a WTS Office or a customer site
- Health & Safety Performance Indicators, including health & safety regulatory violations as well as injuries and accidents involving WTS employees, suppliers, contractors and/or transporters while at a WTS office or customer site
- Security Performance Indicators
- Quality Performance Indicators, including customer surveys and feedback
- ACC Performance Indicators, including other RCMS® related metrics required by the American Chemistry Council (ACC)

LM WTS

**RCMS® Monitoring
& Measurement
Program**

RCMS® Documentation

WTS continues to maintain, audit, and continually improve documented procedures to support the effective and consistent implementation and maintenance of the company's Responsible Care® Management System (RCMS®). The RCMS® Documentation structure includes:

Level 1: The RCMS® MANUAL

- The RCMS® manual describes the RCMS® scope, policy, and core elements of the RCMS® that conform to the ISO 9001 (2007) Quality Management Systems standard.

Level 2: MANAGEMENT SYSTEMS PROCEDURES (MSP)

Level 3: RCMS® OPERATIONAL CONTROL PROCEDURES, HEALTH & SAFETY PROGRAM/PROCEDURES (HASP), ENVIRONMENTAL MANAGEMENT PROGRAM/PROCEDURES (EMP) and QUALITY MANAGEMENT

- Procedures to ensure that individual activities are undertaken in a systematic and controlled manner to conform to the WTS RCMS® policy Commitment

Level 4: EXTERNAL DOCUMENTS

RCMS® related procedures/documents authored and controlled by stakeholders that describe required action by WTS to conform to the WTS policy commitments, for example: agency regulations, ACC requirements, TSDF blank profiles, and customer requirements

RECORDS

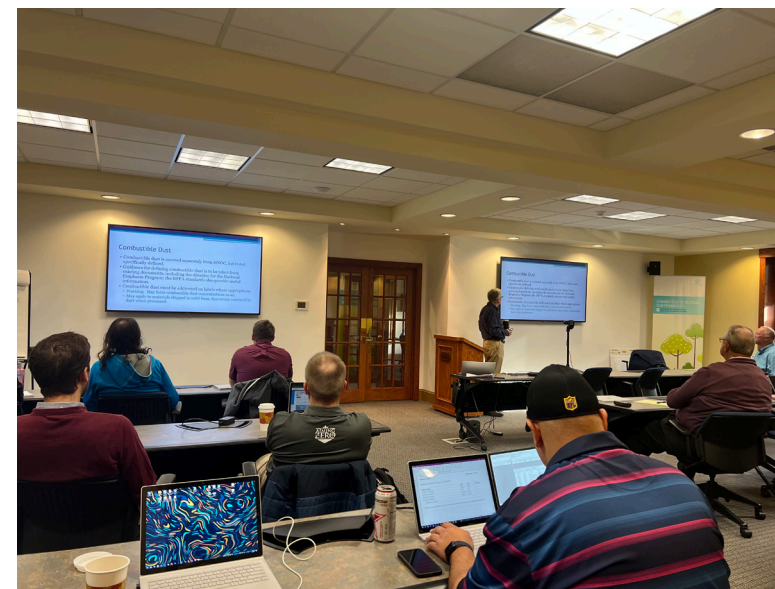
- Documents that are maintained and preserved by WTS to illustrate specific RCMS® related requirements have been completed.

During 2021, all WTS employees continued to be responsible for:

- Following all applicable RCMS® requirements as specified in established procedures addressing training, awareness, and competence
- Notifying WTS' RCMS® Team of any changes in services or activities that may impact the RCMS®, and offering suggestions regarding potential RCMS® improvements
- Notifying our RCMS® of any non-conforming conditions
- Establishing and implementing Objectives for the continual improvement of our RCMS system

WTS continued to implement and update its RCMS® Employee Function Specific Training Matrix for:

- Initial HAZWOPER training
- Annual EHS&S Refresher training
- USDOT HazMat training
- IATA training
- EHS&S Administration
- First Aid/CPR training
- Bloodborne Pathogens Training
- RCMS® Training
- Defensive Driving Training
- Workplace Sexual Harassment Prevention Training, and
- IT Security training



Training

General Environmental Management Practices

In 2021, all WTS office locations adhered to general environmental management practices and procedures dealing with:

- Natural Resource Conservation, addressing:
 - Natural Gas Use Reduction
 - Minimizing Electricity Consumption
 - Motor Vehicle Fuel
 - Water Consumption and Maintenance
- Waste Management, including procedures ensuring proper management of:
 - Non-recyclable trash
 - Recyclables
 - Universal wastes, including spent batteries and light bulbs
 - Electronic wastes, including but not limited to: computers, printers
- First Aid & Medical Wastes
- Water Emissions
- Storm sewer management
- Sanitary sewer Management
- Air Emissions Control and Maintenance
- Community Aspects, including traffic Congestion and Fence Line Noise and Odor
- Emergency Procedures



The third-party auditor, auditing WTS' RCMS® for the first time and hoping to find at least one non-conformance, noted in the closing conversation that:

“This is my first time and first report with No findings. That is a non-routine thing from my perspective. It was a pleasure auditing WTS, your employees knew where things were, the system is organized and I can tell that your system is active within WTS and you are engaged with it. This is my shortest report ever!”

**RCMS® - 2021
Performance
Summary**

Goal Zero - Safety



Michael Oliver
Vice Chairman

“GOAL ZERO has been a mantra and way of life for WTS since 1982 meaning that we strive for 100% compliance and zero safety concerns for all the services we provide our clients. Our commitment to GOAL ZERO covers all areas of our operations but none more important than the safety of our employees and the safety of our client’s operations and their employees”

To comply with our Goal Zero initiative, WTS has committed and implemented robust safety and operational training for all our Environmental Managers that are required on our client sites. This training exceeds the most stringent requirements established under new federal and OSHA requirements concerning the spread of COVID-19.

Safety Always – A WTS Shared Value

Our Responsible Care® policy statement clearly states: “we will provide a safe, secure and healthy work environment for all employees, stakeholders and others working on our behalf. We will protect and safeguard the communities in which we work”.

Responsible Care® is the chemical industry’s world-class environmental, health, safety and sustainability initiative, RC companies are leaders working to advance the safety and sustainability of our employees, our facilities and communities in which we operate.

WTS’ RCMS® connects our core values, **SAFETY ALWAYS** and **GOAL ZERO**, to our thinking, decisions and actions.

The company has provided activity-specific responsibilities to WTS personnel within the text of each individual WTS health and safety procedure. These responsibilities apply to WTS’:

- Executive Management
- EHS&S Manager
- Account Managers
- Site Health and safety Officers
- WTS Employees and WTS Contractors



Responsible By-Product & Waste Management

Our objectivity continues to drive us to take a holistic and systematic approach to waste and by-product management at multiple manufacturing facilities throughout the United States. With access to the largest network of commercial and captive treatment storage and disposal facilities, transporters, recyclers and specialty chemical processors.

In 2021, WTS' By-Product Management process continued to be the catalyst of our objectivity. This process aligns customer objectives and our service activities transparently as we collaborate together to deliver safe, innovative and beyond compliant waste management and by-product logistics solutions.

WTS continued to enhance the sustainability of our stakeholders using this process, by developing and implementing service solutions focused on one or more of the following customer objectives:

- Zero Waste and Zero Waste to Landfill
- Reclamation and Reuse
- Repurposing recovered by-products as supplemental raw materials
- Minimizing hazardous waste and preventing multi-media chemical releases
- Sustainable Materials Management
- Reusing Discarded Materials in a closed loop to promote Circular Economy
- Ensuring Compliance and minimizing workplace and environmental risks
- Minimizing GHG Emissions by conserving energy and improving resource efficiency

In 2021, WTS managed **14,642 customer profiles**, 38% of which were managed via a **sustainable outlet**.



Case Study - By-Product Management at Multiple Customer Sites

WTS manages all aspects of waste disposal for a large client with presence across the United States. Using our By-Product Management Plan at 54 generator locations throughout the country, WTS works with the client to manage all aspects of their waste disposal, including Solid Waste Trash & Recycling, Hazardous Waste by-products, lab packs, Universal Waste, E-Waste, etc. WTS also works with the client to assist with Emergency Response and site decontamination activities, as necessary. Sites vary in size from VSQG to LQG and the scope of activities at each site varies depending on site needs. In some cases, WTS has an Environmental Manager on-site several days per week, or as needed, to provide assistance with site related waste activities.

WTS uses our By-Product Management Process to align the customers objectives with waste activities. The customer has corporate established goals to reduce volume to landfill and increase amount of waste going to a sustainable solution. From 2019 to 2021, WTS has worked with the client to reduce the total pounds to landfill over 2 MM pounds. This represents roughly a 70% reduction in volume to landfill over the 3-year time period. In 2021 alone, WTS managed almost 66 MM pounds of material from the sites across the country and approximately 67% of the material was managed with a sustainable solution.

In the past 8 years of working with this client, WTS has deployed sustainable solutions for over 390 million lbs. or 196,000 tons of by-products since 2014. During this same period, nearly 565 million lbs. or 282,000 tons of materials have been safely managed by WTS through our Responsible Care® Management System without incident, violation or claim.

Case Study - Management of Recyclables

Management of Recyclables from Centralized In-Plant Recycling Center

At a South Carolina based facility with multiple manufacturing buildings and warehouses on one campus, WTS, Inc. managed all recyclables, including discarded products and packaging processed and staged at the client's centralized recycling center. WTS coordinated proper segregation, baling and packaging of recyclable materials. WTS found homes for recyclables via our extensive supplier network and managed all outbound transactions while optimizing quality/value of recyclable material.

In 2021 recycling activities coordinated by WTS, Inc. at this facility totaled more than 8 million pounds of material including:

- PALLETS - 3,096,000 lbs
- CARDBOARD-OCC - 1,748,284 lbs
- MIXED PLASTIC BALES - 412,887 lbs
- INK JET PAPER BALES - 373,131 lbs
- LAMINATED ROLLS-LOOSE - 369,193 lbs
- BLEACH WET STRENGTH - 321,037 lbs
- CLP-LOOSE - 219,260 lbs
- POLY (SBS) - 201,600 lbs
- CARDBOARD-CHIP - 185,065 lbs
- WOOD - 176,900 lbs
- CARBOARD-OCC (CORES) - 128,634 lbs
- OVERLAY - 102,933 lbs
- CARDBOARD-OCC (BALES) - 84,780 lbs
- Additional materials included batteries, lamps, empty poly and steel drums, office paper, etc.



Single-Use Plastics Bioprocessing

In 2021, WTS enhanced the sustainable performance of a world class, leading contract development and manufacturing organization providing process development of cell culture, microbial fermentation and cell/gene therapy with on-site manufacturing.

Single-use plastics bioprocessing has recently experienced tremendous growth in the biopharmaceutical manufacturing market. In contrast to traditional bioprocessing relying on durable stainless-steel equipment, modern single-use systems engage in the single use of disposable plastic components.



Single-use plastic comes with the potential for increased productivity, while reducing costs of goods and higher quality products. Single-use plastics also have the potential to streamline personalized medicine supply chains.

WTS is addressing the sustainable materials management challenges of what to do with the discarded materials on the back-end of production. Prior to WTS' involvement, discarded materials were autoclaved and landfilled. To minimize reliance on land disposal, WTS partnered with innovative technology and service providers to collaborate on new destruction and recycling service solutions, effectively minimizing environmental risks while increasing value of recovered recyclable plastics.

WTS has collaborated with its service providers on a sustainable service solution that will allow all discarded materials to be collected, treated and recycled at one commercial location using an innovative technology for the destruction of contents and the decontamination of recovered plastics. This sustainable solution will allow for **100%** of the single-use plastics, plastic lab consumables, and lab PPE to be effectively treated at a rate of over **550,000 pounds per year**. This solution is being expanded and applied to three new areas as the journey continues to enhance destruction and recycling of all plastic components.

Responsible Care® Beyond the Fenceline

At WTS, we promote the Guiding Principles of Responsible Care®. Included in these Principles is a commitment for us, together, as stakeholders to “promote pollution prevention, waste minimization and conservation of energy and other critical resources at every stage of the life cycle of products”.

These Guiding Principles led to the establishment of customized Responsible By-Product and Waste Management Systems in collaboration with our customers “Beyond their Fenceline”.

Activities and locations characterized as “beyond the fencelines” include: tollers, distribution centers, warehouses, research & development centers and customer sites anywhere in the value chain where products and by-products are generated and managed.



Warehouse Cleanouts

In 2021, WTS personnel assisted several clients by responsibly managing an array of regulated waste streams generated from warehouse and chemical distribution centers. Our environmental professionals are trained to take a client's inventory of discarded chemicals and products, and objectively examine and document their properties, chemical composition and hazards to ascertain the required methods of management. In addition to ensuring compliance, WTS' approach to discarded chemicals minimizes workplace safety concerns as well as environmental risks by overseeing the required packaging of discarded materials and responsibly managing proper disposal of materials, including recycling and beneficial reuse.

With each project, WTS provided a trained team of environmental professionals to verify warehouse inventory and updated material profiles in alignment with predefined material management strategies, which encompassed the direct reuse of unwanted/off-spec Chemical Feedstock, recycling and beneficial reuse as well as thermal destruction by pre-qualified suppliers. Within the scope of these projects, WTS supplied the required packaging containers, labor, proper markings, labels, and knowledge of compatibility to segregate discarded chemicals. To enhance sustainable performance, WTS coordinates all outbound transportation, including required shipping documentation and analyses of outbound transactions.

In 2021, WTS managed over 300,000 pounds of discarded chemicals from multiple warehouse locations as well as multiple outbound transactions of packaged chemicals using over ten pre-approved supplier locations. To minimize the potential for accidental releases, WTS also served as emergency response provider for leak and spills identified in the customer's warehouse centers. As an example, WTS professionals effectively responded to a warehouse emergency involving a tote leaking hydrazine.

All of the 2021 warehouse cleanout services were performed adhering to WTS' GOAL ZERO.



Sustainable Management of a Legacy Site

In 2021, WTS supported efforts to manage compliance requirements and sustainable performance measures associated with an inactive gypsum storage pile located on a 30+ acre manufacturing site engaged in the production of fertilizers.



The referenced site collects all rainwater for treatment and compliance with a Texas Pollutant Discharge Elimination System permit. All contact water is collected in a control system encompassing a moat, two lower ponds, and four handling ponds.

The site normally receives sixty inches of rain per year, which typically accounts for approximately 49 million gallons of water requiring proper control. Since 2009, WTS' professionals have been providing daily site and equipment inspections, all discharge sample collection and coordination of required testing, coordination of required site equipment and maintenance upkeep, and discharge monitoring reporting, calculated on a monthly basis.

WTS has enhanced stakeholder sustainability by ensuring responsible management of all discharge activity with zero non-compliance or permit violations and issues. WTS met all aspects of our GOAL ZERO expectation.

Stakeholder Communication

A few ways we communicate with internal and external stakeholders are through web content including blog posts, case studies, our RCRA 101 series and our getting to know us series introducing WTS staff. Our learning center articles frequently touch on sustainability topics.

WTS RCRA 101

Under the banner of RCRA 101, WTS made available to internal and external stakeholders a series of articles to help generators unravel the complexities of the RCRA requirements while assisting with compliance requirements. Some examples of published articles aiding small and large generators, include:

- Definition of Solid and Hazardous wastes
- Common RCRA Violations
- Waste Characterization
- Assigning Hazardous waste Codes
- Land Disposal Restrictions
- RCRA Exclusions
- RCRA recordkeeping and retention



Getting to Know Us

As a leading non-asset based waste and by-product management company, WTS, is all about our people. In 2021, WTS published a series 'Getting to Know Us' videos that provided our stakeholders a chance to virtually meet some of our chemists, chemical engineers, environmental and regulatory experts as well as other WTS team members developing sustainable material management solutions while finding innovative service solutions for industrial wastes and by-products.

To facilitate collaboration with our customers on sustainable challenges and priority topics for improving stakeholder environmental performance,

WTS conducted its annual Client Satisfaction Survey with all customers. The survey addressed a number of priority topics and challenges, including:

- Responsible Care®
 - Knowledge of relevant EHS&S regulations and requirements
 - Commitment to Continuous Improvement
 - Supplier Management
 - Managing Transporters and Shipping Documentation
- Overcoming Supply Chain Challenges in the waste management sector
- Environmental Priority Objectives
- Sustainability Reporting – Specific Metrics and Targets
 - WTS' LMwts – functionality focused material profiles, tracking & logistics management, and regulatory reporting
- Commitments to Sustainability – Goals/Projects focused on:
 - Landfill avoidance
 - Circular Economy (Alternate Feedstock)
 - Sustainable Materials Management (SMM)
 - Warehouse/3rd party Location Materials Management
- Alternative Feedstock for Production/In-Plant Consumption
- Value-Add Service Offerings, focused on:
 - Regulatory Compliance Assistance
 - Reuse/recycling of Discarded Materials
 - Secondary Sales of unused/Off-spec raw materials
 - Supplier Selection Process
 - Environmental Auditing
 - Training

2021 WTS Client Satisfaction Survey

Monthly Stakeholder Message & Updates

In 2021, WTS published monthly stakeholder messages from Michael Wurst, WTS’ President and CEO along with technical blogs and references addressing regulatory updates, emerging legislation, waste management challenges and solutions, sustainability and workplace safety. Among the articles and topics highlighted included:

- Rules around speculative accumulation for secondary hazardous materials
- TSCA implications of managing by-products for commercial reuse
- USEPA’s e-Manifest updates
- Safety Always
- Ensuring RCRA Compliance at warehouse and third-party locations
- Finding value in by-products and materials through recycling and reclaim
- Recycling updates dealing with glass, plastics, metal cardboard paper and electronics
- Challenging each other to responsibly exit RCRA to power Circular Economy
- EPA’ s memorandum on incineration market backlog
- PFAS regulatory trends
- Momentum at the state level for extended producer responsibility legislation
- Zero Waste and landfill avoidance

Team Huddles

Throughout the year, Mike Wurst, WTS’ President & CEO moderated company-wide Team Huddles. These Team Huddles reinforced the company’s commitments, of working together to enhance the sustainability of our stakeholders and our conformance with the core policies outlined in our Responsible Care Management System®.



Stakeholder Webcasts & Presentations

The WTS Responsible Care® Journey, presented by Brian Burns, Gary Hall and Michael Wurst



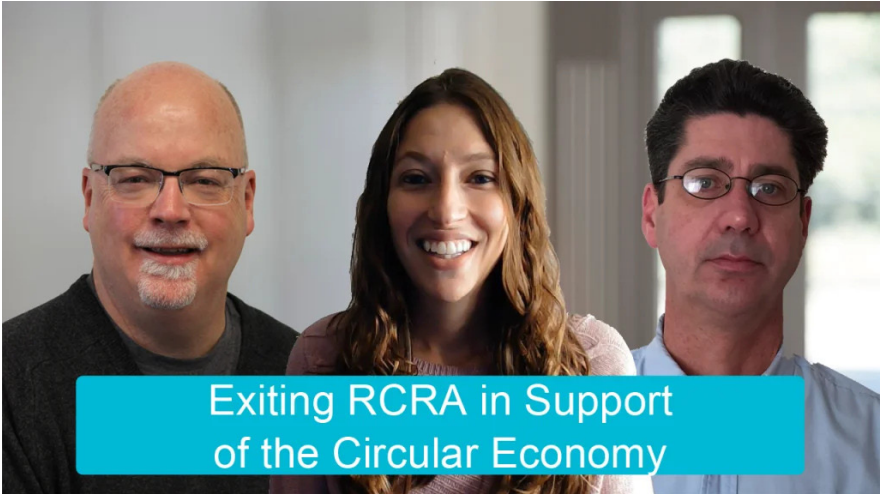
Michael Wurst



Brian Burns



Gary Hall



Exiting RCRA in Support of the Circular Economy, moderated by Lisa Schley and presented by James Moulds and Brian Burns

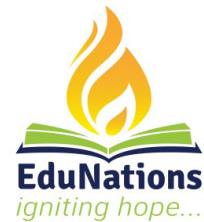
RCRA Challenges at Distribution, presented by Lisa Schley and Brian Burns at ChemEdge



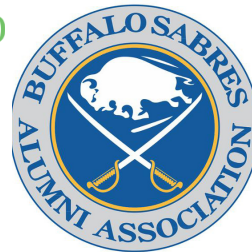
Community Outreach

As part of our community outreach WTS supported

- The Lower Niagara River Region Chamber of Commerce Golf Outing
- Village of Lewiston Recreation Dept Red Brick Spring Fling
- Delaware City Refinery Annual Charity Golf Fundraiser
- Niagara Falls Little League Team Sponsor
- Niagara Falls Memorial Medical Center Foundation
- Mount St Mary's Hospital Foundation
- Read to Succeed Buffalo
- EduNations – schools in Sierra Leone
- Lewiston Family Ice Rink Sponsor
- National Federation for Just Communities of WNY
- Buffalo Sabres Alumni Association
- The First Tee - Western NY
- Omni Cheerleading Team Sponsor
- Niagara County SPCA
- Cartagena Paws



Read to Succeed Buffalo
Community Alignment for Reading Excellence



Gill Creek Park Cleanup in Niagara Falls

On May 1st, 2021 WTS employees took part in a community effort led by the Buffalo Niagara Waterkeepers, removing many bags of garbage and recycles from the creek and from around the park.



EduNations

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 via a donation in 2021. EduNations educates over 3,700 students and employs over 122 teachers in 15 schools throughout 6 remote villages in Sierra Leone.



Community Outreach

E-Waste Event at WTS

In June of 2021, WTS held an E-Waste Event at our Lewiston Office. Employees, friends, and neighbors brought bulbs, batteries, and unused electronic recycling to be collected by SunnKing, an electronic recycler in Buffalo, NY. A socially distant luncheon was held in the parking lot with employees to safely reconnect with eachother after a long absence of not being together in the office. All the monies recovered from the collection of electronics were donated to Camp Good Days & Special Times in WNY.



Where Objectivity Flourishes





LEWISTON, NEW YORK