

The logo for Jupiter Aluminum features the word "JUPITER" in a bold, sans-serif font with a blue horizontal bar through the letter "E". Below it, the word "ALUMINUM" is written in a smaller, all-caps, sans-serif font with a trademark symbol. A blue arc is positioned to the right of the text, partially enclosing it.

JUPITER
ALUMINUM™

WASTE MANAGEMENT
SYSTEM

A series of four parallel, light blue diagonal lines extending from the bottom left towards the top right, crossing the text area.



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Purpose

Jupiter Aluminum recycles over 300 million pounds of scrap aluminum each year. As it is in our business's nature to support a circular economy, we are committed to maintaining a waste management system that establishes a practical framework for minimizing waste across all operational levels.

Scope

This system encompasses all of Jupiter's domestic operations, including (spanning) remelting, rolling, finishing, coating, and the associated office buildings.

Executive Sponsorship

Jupiter Aluminum has established a Sustainability Steering Committee (SSC) consisting of employees, management, and executive team members that shall oversee Jupiter's sustainability programs, including this waste management system. This management system will be reviewed by the sustainability steering committee on an annual basis or as needed.

Methodology

Waste management is a core component of Jupiter Aluminum's Environmental Management Program. To properly manage and minimize the impacts associated with its operations, Jupiter will utilize the following approach:

- Identify Waste Streams
- Assess ESG Risk
- Track, Measure, and Report
- Establish Reduction Goals
- Implement Controls and Training
- Benchmark Progress

The above methodology allows Jupiter to continuously manage and reduce waste generation.

Waste Streams

Jupiter tracks and assesses its waste streams on an annual basis. This data is published in Jupiter Aluminum's Sustainability Report and is used to assess and determine future mitigation goals.

Jupiter's waste streams consist of the following:

- Recyclables
- Non-Hazardous Industrial Waste (Residual Waste)
- Municipal Solid Waste (MSW)
- Hazardous Waste

Please find site specific waste stream details in [Appendix A](#).

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Waste Sources

Jupiter Aluminum's primary waste sources can be categorized into the following 3 areas:

- Office/Administrative
- Production Systems
- Shipping/Packaging

Monitoring/Reporting

To properly benchmark waste reduction performance, Jupiter monitors and tracks all its waste streams. Jupiter Aluminum uses this data to report and sets targets regarding hazardous and non-hazardous waste outputs. This data is published in its annual sustainability report.

Hazardous Waste

Any hazardous waste that Jupiter generates is shipped to a permitted Treatment, Storage, and Disposal Facility (TSDF). A manifest accompanies hazardous waste that is transported. The manifest allows all parties involved in hazardous waste management to track the movement of hazardous waste from the generator's site to the site where the waste will be treated, stored, or disposed.

Risk Assessment

Jupiter Aluminum has conducted a third-party Biodiversity Risk Assessment of all US facilities to verify that it conducts its operations in an environmentally sound manner. This assessment was carried out by August Mack Environmental Inc. and the included waste analysis resulted in the determination that "no additional controls are warranted". However, Jupiter will continue to implement additional systems to minimize landfilled waste outputs.

Jupiter is regulated for hazardous waste under the Resource Conservation and Recovery Act (RCRA). Subtitle C of RCRA establishes a federal program to manage hazardous wastes from cradle to grave. Through this program, hazardous waste is handled in a manner that protects human health and the environment.

There are Subtitle C regulations for the generation, transportation, and treatment, storage, or disposal of hazardous wastes. Jupiter complies with all generator requirements including manifesting of wastes, weekly inspections of waste accumulation areas, accumulation time limits and employee training.

Any hazardous waste Jupiter generates is shipped to a Treatment, Storage, and Disposal Facility (TSDF). Hazardous waste that is transported is accompanied by a manifest to allow all parties involved to track the movement of hazardous waste from the generator's site to the TSDF.

When applicable, Jupiter sends waste to be treated, recycled, or reused to limit the impact to ecosystems. When disposal is the only available option, waste will be sent to permitted landfill. Subtitle D of RCRA sets minimum federal criteria for the operation of landfills, including design criteria, location restrictions, financial assurance, corrective action (cleanup), and closure requirements.

The risk of mismanaged waste is material and warrants controls. However, as discussed above, the applicable regulations mandate the proper management of these wastes onsite and require that the

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wastes be sent to a facility capable of safely treating and/or disposing of the waste. Therefore, it is determined that no additional controls are warranted, outside of what is required by RCRA.

Waste Review

The Jupiter Aluminum SSC has conducted an internal Waste Review to establish organizational waste mitigation goals and to determine the need for additional mitigation measures. This review is conducted on an annual basis.

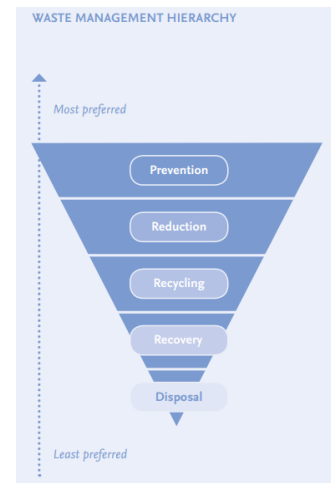
Goals

Jupiter has established a company-wide goal of reducing landfilled waste by 30% by 2025 (2018 baseline). The Jupiter Aluminum SSC will review this goal on an annual basis to address any operational changes.

Mitigation Systems

Jupiter has incorporated the principles of a waste mitigation hierarchy (see figure below) into its waste management system. The prioritization of best practice mitigation tools (Prevention, Reduction, Recycling, and Recovery) is an important element of efficient operations at Jupiter production facilities.

The first step in developing an effective mitigation plan is to create a baseline of current waste generation. Jupiter uses this baseline to identify potential inefficiencies in its operations. The Plant Manager and Jupiter SSC oversees a waste review of facility operations on an annual basis or as needed. This review includes an evaluation of more eco-friendly (sustainable) alternatives to current disposal methods.



Once a stream is identified for mitigation, the Jupiter SSC and local Plant Manager will develop an implementation plan for the proposed changes. This must include consideration of available resources, requirements for updated training or procedure, and be communicated to relevant staff for implementation.

Each department at Jupiter works in a coordinated effort to assist in this process.

Training and Communication

Hazardous Waste

Under RCRA, all solid waste generators must determine if their solid waste is hazardous and thus subject to regulation as a hazardous waste or non-hazardous. Jupiter personnel must be trained through a combination of classroom instruction and on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with RCRA requirements. The training must include hazardous waste management procedures relevant to their roles.

Non-Hazardous Waste

Jupiter Aluminum communicates non-hazardous waste handling procedures to all employees. When implementing new waste minimization processes, Jupiter updates employees on any new procedure

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and informs relevant teams on the reasoning behind changes. The onsite Plant Manager oversees this process and must ensure that communication occurs within a reasonable time frame.

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Appendix

Hammond, Indiana – Production Facility

Waste Stream	Category	Waste Source	Waste Destination
Furnace Baghouse Dust	MSW/Process	Production Systems	Landfill
Dross Processing Baghouse Dust and Fines	MSW/Process	Production Systems	Landfill
Used Oil	Recyclables	Production Systems	External Recycling Program
Parts Washer Fluid	Process Waste	Production Systems	External Reuse Program
Refractory Brick	MSW/Process	Production Systems	Landfill
Used Baghouse Filters	MSW/Process	Production Systems	Landfill
Filter Press Waste	MSW/Process	Production Systems	Landfill
Used Oily Absorbents	MSW/Process	Production Systems	Landfill
Wood Pallets	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Fiber Core	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Plastic Packaging	Recyclables	Shipping/Packaging	Landfill
Scrap Cardboard	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Used Gaylord (cardboard)	Recyclables	Receiving	External Recycling
Office Waste (non-recyclable)	MSW/Office	Office/Administrative	Landfill
Office Waste (Recyclable)	Recyclables	Office/Administrative	External Recycling Program
Spent Light Bulbs	MSW/Other	Office/Administrative	External Recycling Program

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Fairland, Indiana – Coating Facility

Waste Stream	Category	Source	Waste Destination
Paint Waste Liquid	Hazardous Waste	Production Systems	Offsite Treatment
Corrosive Solids	Hazardous Waste	Production Systems	Offsite Treatment
Corrosive Liquids	Hazardous Waste	Production Systems	Offsite Treatment
Paint Debris	Hazardous Waste	Production Systems	Offsite Treatment
Parts Washer Fluid	Hazardous Waste	Production Systems	External Recycling Program
Paint Solvent Waste	Hazardous Waste	Production Systems	External Recycling Program
Evaporation Tank Sludge	Residual Waste	Production Systems	Offsite Treatment
Filter Cake	Residual Waste	Production Systems	Landfill
Used Oily Absorbents	Residual Waste	Production Systems	Landfill
Used Oil	Recyclables	Production Systems	External Recycling Program
Plastic Packaging	Recyclables	Shipping/Packaging	Landfill
Wood Pallets	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Fiber Core	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Shipping Pallets	Recyclables	Shipping/Packaging	External Recycling Program
Scrap Cardboard	Recyclables	Shipping/Packaging	Landfill
Office Waste (Recyclable)	Recyclables	Office/Administrative	External Recycling Program
Office Waste (Recyclable)	Recyclables	Office/Administrative	External Recycling Program
Office Waste (non-recyclable)	MSW	Office/Administrative	Landfill
Spent Light Bulbs	MSW	Office/Administrative	External Recycling Program

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Beech Bottom, West Virginia – Coating Facility

Waste Stream	Category	Source	Waste Destination
Paint Waste Liquid	Hazardous Waste	Production Systems	Offsite Treatment
Corrosive Solids	Hazardous Waste	Production Systems	Offsite Treatment
Corrosive Liquids	Hazardous Waste	Production Systems	Offsite Treatment
Paint Debris	Hazardous Waste	Production Systems	Offsite Treatment
Parts Washer Fluid	Hazardous Waste	Production Systems	External Recycling Program
Paint Solvent Waste	Hazardous Waste	Production Systems	External Recycling Program
Evaporation Tank Sludge	Residual Waste	Production Systems	Offsite Treatment
Filter Cake	Residual Waste	Production Systems	Landfill
Used Oily Absorbents	Residual Waste	Production Systems	Landfill
Used Oil	Recyclables	Production Systems	External Recycling Program
Plastic Packaging	Recyclables	Shipping/Packaging	Landfill
Wood Pallets	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Fiber Core	Recyclables	Shipping/Packaging	External Recycling Program or Landfill
Shipping Pallets	Recyclables	Shipping/Packaging	External Recycling Program
Scrap Cardboard	Recyclables	Shipping/Packaging	Landfill
Office Waste (Recyclable)	Recyclables	Office/Administrative	External Recycling Program
Office Waste (Recyclable)	Recyclables	Office/Administrative	External Recycling Program
Office Waste (non-recyclable)	MSW	Office/Administrative	Landfill
Spent Light Bulbs	MSW	Office/Administrative	External Recycling Program



Review and Revision Log

Reviewer(s)	Date	Revisions
Mark Volkmann Bill Kenealy Vickie Smith Laura Dinger	May 2022	Changed titles: CFO to Vice President, Finance; Human Resources Director to Vice President, Human Resources; Director of Manufacturing to Vice President, Manufacturing. Corrected some spelling and grammar errors.
Mark Volkmann	June 2023	Updated to new corporate logo.

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