

Reclassifying Waste to Avoid Disposal Liabilities.

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The immortal William Shakespeare once wrote, "A rose by any other name would smell as sweet." But while changing an object's name may not alter its intrinsic nature, redefining it legally can certainly protect a company from potential liabilities.

Bath Iron Works of Bath, Maine, a division of General Dynamics, has been building ships for the U.S. Navy since the 1950s. With 15,000 employees, the 50-acre complex is currently the lead production facility for the Navy's Aegis Destroyer, the most advanced warship of its type in the world.

appointee, with the liability issue being high on the agenda. After examining the situation, Waste Management proposed to reclassify all non-recyclable waste as "special waste," allowing it all to be sent to the one Subtitle D landfill.

It took 12 months for Waste Management's proposal to make it through the regulatory maze, but in the end its plan was accepted. One hundred and twenty old waste containers were removed and replaced with 65 new eight-yard front-end containers and 135 96-gallon carts for the collection of non-recyclable waste throughout the complex. Recyclable waste, including metal, paper and cardboard, continue to be collected separately.

Not only has this new plan removed a potentially serious liability issue, the consolidation of services has resulted in a tangible cost-savings - and the convenience that comes from having a single company responsible for all industrial waste services. The plan helped Waste Management win a three-year contract extension beginning in January 2003 with an additional two optional years beyond the current agreement.

Waste Management has the special waste solutions to keep any facility "ship-shape."

From everyday collection to environmental protection, Think Green. Think Waste Management.

"Waste Management has done an outstanding job. They're very customer-oriented and always go above and beyond what they're required to do."

David St. Laurent
Environmental Specialist II
Bath Iron Works

Waste Management has been providing special waste collection services for the shipyard since the early 1990s. However, until recently, the shipbuilder had manually segregated its non-recyclable Municipal Solid Waste (MSW) from its special waste, the former going to a conventional MSW landfill through another waste hauler, the latter to a specially permitted Subtitle C disposal facility via Waste Management. While this system adhered to local, state and federal environmental regulations, there was always the danger that some special waste could slip through the inspection process and wind up at the MSW landfill - exposing Bath Iron Works to potentially serious fines and other liabilities.

In the late 1990s, a new environmental engineer was appointed to oversee the Iron Works' waste program. Soon thereafter, Waste Management representatives entered into a series of meetings with the new

