

SRS/Airbag Disposal & Deployment Practices: Time for a New Look

by Robert G. Stewart, CCAR President

How does your facility deal with the handling and disposal of airbag components and seatbelt pre-tensioner assemblies? If your answer is, "The same way we always have," keep reading!

Because of changes in the way in which some state regulatory agencies now view the pre-disposal deployment of airbag and seatbelt pre-tensioner assemblies, it may be time for you to take a new look at the subject.

This article focuses on the proper handling and disposal of airbag components and seatbelt pre-tensioner assemblies, both deployed and undeployed, that have either been removed from vehicles in a service or collision repair operation, or a part that has reached its end of shelf life.

Is An Undeployed Airbag a Hazardous Waste?

The short answer to this question – in general – is, "Yes." The U.S. Environmental Protection Agency (EPA) has deferred the responsibility to each individual state of determining if airbags, whether they are deployed or undeployed, represent hazardous waste. Repair shops should stay informed of state and/or local regulations that may affect them. In the absence of such policies, all airbags and seatbelt pre-tensioners should be considered hazardous material (HazMat) for purposes of shipping and hazardous waste for purposes of disposal.

CCAR-*GreenLink*[®], the National Environmental Compliance Assistance Center for Auto Repair and a service of the Coordinating Committee For Automotive Repair (CCAR[®]), surveyed environmental regulatory agencies in all fifty states, plus the District of Columbia and Puerto Rico, to determine their policies in place regarding airbags and related issues. The survey found that a large majority of states regard undeployed airbags as hazardous waste because the inflating device contains reactive and explosive material.

Follow this link to see [CCAR-*GreenLink*'s research results](#) and your state's position.

NOTE: The information contained in this link is available for general reference purposes only, and it is subject to change. The information should ***not*** be considered

definitive compliance guidance. Please check with your [state agency](#) for the most current regulations in effect in your area.

Does the pre-disposal deployment of an airbag render the device non-hazardous?

In general, the short answer to this question is also, "Yes." Most states consider a deployed airbag to be non-hazardous waste, but some regulations at the state level now define the pre-disposal deployment of airbag and pre-tensioner assemblies as "treatment" of a hazardous waste.

Is this "treatment" subject to permit requirements at the state level?

The short answer to this question: "Sometimes." The CCAR-*GreenLink*[®] survey found the states with differing views on the issue. As a result, the manual deployment of airbag components for disposal purposes may not be a "best practice" in some states, and other methods of disposal must be considered.

Even in those states where deployment is acceptable treatment to render the component "non-hazardous," special training, certification or licensing may be required. Auto repair facilities should carefully review local and state regulations, train personnel to follow consistent and compliant practices and, where appropriate, consider contracting with a licensed hazardous waste transporter, disposal facility or recycler to manage undeployed airbag and seatbelt pre-tensioner disposal. Requirements for HazMat treatment licenses and permits vary from state to state. The links at the end of this article contain more information.

Disposal of Undeployed Airbags

In making the decision of what to do with undeployed airbags and seatbelt pre-tensioner assemblies, you need to determine:

- whether their state considers undeployed airbags to be hazardous waste (most states do),
- whether deploying the unit constitutes "acceptable treatment" of the hazard, rendering the component "non-hazardous" (most states do), and
- whether their state considers airbag deployment a HazMat treatment practice that requires a permit (many states do).

Auto repair facilities should also recognize that undeployed airbags and pre-tensioners are considered HazMat for purposes of shipping and handling, and that HazMat-specific training – under regulations of the U.S. Department of Transportation (DOT) – is required for certain shipping and handling personnel.

Here are two important points to keep in mind in determining how to dispose of your undeployed airbags and seatbelt pre-tensioner assemblies:

- Never discard undeployed airbags in the trash. Most states consider undeployed airbag assemblies to be hazardous waste, and these components are considered an extreme hazard by solid waste transporters and landfills.
- Use the services of reputable, licensed haulers for pick up and proper disposal. (See the list of resources at the end of this article for more information.)

Are Deployed Airbags a Hazardous Waste?

This question has another short answer: “Sometimes.”

While forty-four states, plus Puerto Rico and the District of Columbia, currently consider a deployed airbag **not** to be a hazardous waste, and five states (Florida, Michigan, Missouri, Ohio and Washington) deem deployed airbags **not** to be hazardous waste only if they are recycled, two states (Virginia and Texas) consider deployed airbags **to be** a hazardous waste. In Nevada, they **may** be hazardous waste depending upon the amount of metals it contains. Since all of these regulations are subject to change, it is in a business’s best interests to stay up-to-date on the laws governing these issues.

Can Airbags Be Recycled?

Everything can be recycled, including airbags. The make-up of airbag modules includes aluminum, stainless steel or mild steel, nylon and plastic.

Some airbag manufacturers have recycling facilities. Autoliv, an airbag manufacturer, has a recycling facility in Promontory, Utah, where the company cites the ability to recycle 98% of the materials in individual units. Autoliv will process airbags of any manufacture; there is a fee for this service.

Generally speaking, there is a cost for choosing to recycle airbags. There are also costs associated with other means of undeployed airbag disposal; however, if your facility is not in a position to deploy an airbag and dispose of it as non-hazardous waste, these are your only other options.

Conclusion

In the absence of national standards governing the handling and disposal of deployed or undeployed airbag modules and seatbelt pre-tensioner assemblies, automotive service and repair facilities need to stay informed of state and local rules.

Additional resources:

U.S. EPA –

[Information for Hazardous Waste Generators](#)

U.S. DOT –

[Overview of Hazardous Materials Regulations](#)

Other information –

[CCAR-GreenLink[®] State-by-State Research Results](#)

[RCRA/Hazardous Waste State Resource Locator](#)

[Online Databases of Hazardous Waste Transporters](#)