

Hazardous Waste Management

Managing Airbag Waste

Information presented in this fact sheet is intended to provide a general understanding of the regulatory requirements governing the management of airbag waste. This information is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the Alabama Department of Environmental Management Administrative Code.

BACKGROUND

Because they contain propellants, undeployed airbag inflators and airbag modules (collectively called “airbag waste”) are hazardous wastes that exhibit the characteristics of reactivity (D003) and/or ignitability (D001). Once deployed, the airbag module consumes the propellant and removes the reactivity and ignitability characteristics.

If managed in compliance with the requirements of ADEM Administrative Code rule (ADEM Admin. Code r.) 335-14-2-.01(4)(j), airbag waste is exempt from regulation under ADEM Admin. Code r. 335-14-3 through 335-14-9.

WHAT ARE THE REQUIREMENTS OF THE AIRBAG WASTE RULES?

Airbag waste that is at the airbag waste handler or that is being transported to an airbag waste collection facility or designated facility is not subject to regulation under 335-14-3 through 335-14-9, and is not subject to the notification requirements of section 3010 of RCRA provided that:

- No more than 250 airbag modules or airbag inflators are accumulated;
- The airbag waste is accumulated for no longer than 180 days;
- The airbag waste is packaged in a container designed to address the risk posed by the airbag waste and labeled “Airbag Waste – Do Not Reuse;”
- The airbag waste is being sent directly to either:
 - ❖ An airbag waste collection facility in the United States in response to a recall, or
 - ❖ A permitted or interim status hazardous waste treatment, storage, or disposal facility.
- The transport of the airbag waste complies with all applicable U.S. DOT regulations during transit.

WHAT RECORDS DO I NEED TO MAINTAIN?

An airbag waste handler must maintain records of all off-site shipments of airbag waste and all confirmations of receipt from the receiving facility for no less than three (3) years. For each shipment, these records must contain the following:

- The name of the transporter and date of the shipment;
- The name and address of receiving facility; and
- The type and quantity of airbag waste (i.e., airbag modules or airbag inflators) in the shipment.

Confirmations of receipt must include:

- The name and address of the receiving facility;
- The type and quantity of the airbag waste received; and
- The date which it was received.

Shipping records and confirmations of receipt must be maintained on-site and made available for inspection.

DO I NEED TO NOTIFY OR COUNT MY AIRBAG WASTE?

An airbag waste handler is not required to notify with regard to the airbag waste. When managed under this rule, airbag waste does not count against your generator status.

NOTE: This rule does not apply to airbag waste collection facilities (any facility that receives airbag waste and accumulates that waste for more than ten days). Airbag waste collection facilities must manage all airbag waste in accordance with all applicable requirements of Division 335-14.

CAN I DEPLOY MY AIRBAG INFLATORS MYSELF?

Under these rules, airbag waste handlers are not allowed to deploy airbag inflators. Those wishing to deploy airbag inflators in accordance with ADEM Admin. Code r. 335-14-8-.01(1)(c)2.(xi) must manage the airbag inflators in accordance with all applicable requirements of Division 335-14 prior deploying them.

WHERE CAN I GET ADDITIONAL INFORMATION?

On-line Resources:

U. S. Environmental Protection Agency: <http://www.epa.gov>

Alabama Department of Environmental Management: <http://www.adem.alabama.gov>

ADEM Administrative Code Division 14 - <http://www.adem.alabama.gov/alEnviroRegLaws/files/Division14.pdf>

ADEM Guidance - <http://www.adem.state.al.us/programs/land/guidanceReports.cnt>:

Hazardous Waste Determination Notification of Regulated Waste Activity

RCRA Small Quantity Generator Handbook Used Oil Management Handbook



Telephone Resources:

Hazardous Waste Compliance Inspectors ••• 334-271-7730

