



CLEAN
DEALERSHIP

April 2013

AWARE

Newsletter

SRS/Airbag Disposal & Deployment Practices – A Refresher

Back in August 2007, Toyota published an AWARE article; “A New Look at SRS/Airbag Disposal & Deployment Practices”. This article provided guidance on the proper handling and disposal of Supplemental Restraint System components, including all types of airbags and seat belt pretensioner assemblies (referred to herein as SRS devices). Toyota is revisiting the subject in this article to ensure continued dealer compliance with associated federal, state and local regulatory requirements. As originally pointed out in the 2007 AWARE article, deployment of SRS devices may be considered “treatment” of hazardous waste and may be subject to permit requirements at the state level.

TMS recommends that dealership compliance or risk management personnel carefully review their local and state regulations, train personnel to follow consistent and compliant practices and, where appropriate, contract a properly permitted or licensed hazardous waste transporter, disposal facility, or recycler to manage un-deployed SRS device disposal.

Toyota has previously issued [TSB SS004-07 \(Toyota\)](#), [SS005-07 \(Scion\)](#) and [TSIB SS005-07 \(Lexus\)](#) to further support this perspective. These Technical Service Bulletins state general guidelines, and the practices described in them should *only* be used by dealership technicians to the extent they are consistent with applicable state and local regulations, and by the dealership’s policies.

NOTE: Special Service Tools (SSTs) for airbag and pre-tensioner deployment are no longer classified as essential SSTs. These tools will continue to be available through the SST program for repair shops choosing to continue airbag deployment in compliance with federal, state and local requirements. Tools may be ordered by contacting SPX/OTC at 800-933-8335.

Disposal of Un-deployed SRS devices

In determining what to do with un-deployed SRS devices, dealership service departments and collision repair shops need to determine:

- whether their state considers un-deployed SRS devices to be hazardous waste (most states do), and
- whether their state considers airbag deployment a hazardous waste “treatment” practice that requires a permit (many states do, although currently a small number of states allow deployment as a regulatory exclusion provided that the airbags are managed in accordance with regulatory requirements and other conditions are met).

Dealerships must also understand that un-deployed SRS devices are considered Hazardous Materials (HazMat) for purposes of transportation, and that HazMat-specific training is required for all shipping and handling personnel identified as “hazmat employees”. Your “HazMat employees” must have the appropriate training in HazMat shipping and handling, as mandated by the U.S. Department of Transportation (DOT), to legally offer these items to a carrier for shipment. Toyota does not allow returns of any HazMat, including any type of SRS device at the present time.

Therefore, there are several important points to keep in mind in determining how to dispose of your un-deployed airbags and seat belt pre-tensioners:

- Never discard un-deployed SRS devices in the trash. Most states consider un-deployed airbag assemblies to be hazardous waste, and these components are considered an extreme hazard by solid waste transporters and landfills.
- Understand and follow all prescribed warranty return



procedures; Toyota/Lexus/Scion dealers are subject to return exclusions for certain parts like airbags and pre-tensioners.

- Use the services of a properly permitted or licensed hazardous waste transporter, disposal facility, or recycler to manage un-deployed SRS device disposal.

As noted above, TMS recommends that dealership compliance or risk management personnel carefully review and ensure compliance with the current, applicable laws and regulations in their jurisdiction. These usually can be found on the state government or environmental agency website, and legal counsel should be consulted where necessary.

There are also good third party resources available to help you make informed decisions based on your local situation. While TMS makes no specific recommendation in this regard, we note that KPA, LLC, an EH&S consulting firm that is engaged by a number of dealerships, maintains state-by-state SRS management information developed from their own research. These resources are to be used only by KPA clients and can be accessed at www.kpaonline.com/airbag. Dealerships may have other consultants or be familiar with other, similar sources of information on the applicable laws and regulations. TMS urges its dealerships to remember that even the best third-party resources may contain omissions or inadvertently become out of date, if laws and regulations (or regulatory interpretations) change and so dealership personnel should always confirm for themselves or with legal counsel that they are relying on the most current laws and regulations applicable in their jurisdiction. TMS does not take any responsibility for a dealership's failure to comply with applicable laws and regulations.

Conclusion

Dealerships need to stay informed of current state and local requirements governing the handling and disposal of deployed or un-deployed airbag modules and seat belt pre-tensioner assemblies, to ensure proper disposal or recycling of these SRS devices. When in doubt, consult your applicable State and/or local agency, your local EH&S consultant or contact the CLEAN Dealer EH&S Hotline at 877-572-4347.

Additional Q&A

Q: Is an un-deployed airbag a hazardous waste?

A: Generally speaking, the short answer to this question is, "Yes." The U.S. Environmental Protection Agency (EPA) has deferred to the individual states the responsibility for determining if airbags, whether deployed or un-deployed, constitute hazardous waste. For this reason, dealerships need to stay informed of state and local regulations that may affect them. If there is any doubt about the appropriate regulatory interpretation, airbags and seat belt pre-tensioners should be considered HazMat for purposes of shipping and hazardous waste for purposes of disposal.

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

A: While most states currently consider a deployed airbag to be non-hazardous waste, the pre-disposal deployment of SRS devices may be considered "treatment" of a hazardous waste and other disposal methods must be considered.

Q: Are deployed airbags a hazardous waste?

A: The short answer to this question is, "Sometimes." Most states currently consider a deployed airbag *not* to be a hazardous waste, but regulations are subject to change. It is in the dealership's best interests to stay apprised of the laws governing these issues.

Q: Can airbags be recycled?

A: Most commodities 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. The Autoliv PARC Recycling program will process airbags of any manufacturer; there is a fee for this service. Generally speaking, there is a cost to dealerships that choose to recycle their airbags. There are also costs associated with other means of disposing of un-deployed airbags; however, if your dealership is not legally permitted to deploy an airbag and dispose of it as non-hazardous waste, these are your only other options. For more information about the Autoliv PARC Recycling program, go to <http://parcrecycling.com>.

