

**Virginia Department of Environmental Quality
Hazardous Waste Program
Management of Automotive Airbags**

March, 2016

Purpose

The purpose of this document is to provide compliance assistance to Virginia facilities that generate hazardous waste and how such hazardous waste should be managed to meet the requirements of the [Virginia Hazardous Waste Management Regulations](#). The information in this document does not apply to persons generating household hazardous waste as defined in 40 CFR 261.4(b)(1).

This information is provided for compliance assistance purposes only by the Virginia Department of Environmental Quality (DEQ). This is not a regulation and, therefore, does not add, eliminate, or change any existing regulatory requirements. The statements in this document are intended for informational purposes only.

Discussion

Is an Undeployed Airbag a Hazardous waste?

Whether an undeployed airbag is a hazardous waste or not depends on its subsequent management. If it is intact and is to be reused/re-installed as a commercial product, then it would not be a “solid waste” by 40 CFR Part 261 definition and therefore, would not be considered a hazardous waste. This is conditional on legitimate re-use as intended as a product rather than it being abandoned, accumulated without intent of use, or otherwise managed in a waste-like manner.

Alternatively, if the metal components of the airbag are to be reclaimed, then the airbag may qualify as exempt hazardous waste scrap metal being sent for reclamation/recycling. As such, it would be exempt from the hazardous waste management requirements.

In both scenarios above, the generator must be able to document that the material is not a waste, or is exempt from regulation (40 CFR 261.2(f)).

If the airbag is to be disposed of or otherwise managed as a “solid waste” per 40 CFR Part 261.2 definition, then it would likely be regulated as a hazardous waste due to the Reactivity characteristic (Waste Code D003). It would not be considered a listed hazardous waste due to the presence of an azide chemical initiator because the azide is part of the product and does not meet the listing description, but the entire discarded product could be considered a

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reactive characteristic waste under 40 CFR Part 261.23. In addition, since the airbag may contain potassium nitrate and other boosters that are oxidizers, the airbag could also be considered a hazardous waste due to meeting the characteristic of Ignitability (Waste Code D001).

If the air bags are managed as a waste and considered a characteristic hazardous waste, then all applicable provisions for hazardous waste management would apply. Specific hazardous waste management requirements will depend on the quantity of hazardous waste generated in a calendar month and the amount of hazardous waste accumulated onsite. For more hazardous waste information, go to the [DEQ's hazardous waste web page](#).

Is a Deployed Airbag a Hazardous Waste?

A deployed airbag would only be considered a hazardous if it continues to exhibit a hazardous waste characteristic (i.e., characteristic other than reactivity). It is up to the generator to determine if the deployed airbag is a hazardous waste. This determination can be made based on either testing or knowledge. If the deployed airbag is not a hazardous waste it can be disposed as solid waste or it can be sent for reclamation/recycle as scrap metal.

Is Deploying an Airbag considered "Treatment"?

If the air bag meets the definition of a solid waste and a reactive hazardous waste and will be sent for disposal, then intentionally deploying them as a means of rendering them less hazardous would be considered a treatment as defined under 40 CFR Part 260.10. Such treatment would only be allowable under a hazardous waste management facility permit.

Deployment while in a vehicle that is destined for recycling as scrap metal would be exempt as deployment could be considered part of the reclamation process. Likewise, airbag components that are deployed and recycled separately would also be exempt.

Deploying airbags canisters accidentally or intentionally is not considered hazardous waste treatment subject to licensing if components of the airbag are recycled separately or with the vehicle. Once deployed, materials from the airbag module, such as scrap metal and plastic can be safely removed for reclamation.

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Is a Deployed airbag considered a Solid Waste?

If the deployed airbag does not exhibit a characteristic of a hazardous waste, then it would require management as a solid waste when disposed. However, if applicable, it may be recycled or reclaimed as scrap metal.

What about Seatbelt Pretensioners?

Vehicles can also be equipped with seatbelt pretensioners which may contain sodium azide. The same information provided above for airbags may also apply to seatbelt pretensioners. Undeployed seatbelt pretensioners containing reactive propellants or oxidizers destined for disposal must be managed as a hazardous waste.

For More Information

Please contact the appropriate [DEQ regional staff](#) if you have any questions regarding applicability of these requirements to your facility.