



Undeployed Air Bag Units

EPA Guidance to NHDES 2008

Regulatory interpretation from Environmental Protection Agency (EPA New England) to NHDES regarding the handling and management of undeployed air bag units which contain sodium azide.

1. Should undeployed air bags be regulated as a reactive hazardous waste?
As with all waste determinations, it is the generator's responsibility to determine if the waste they are creating is hazardous. If the units are destined for disposal and not reuse, then they must be managed as a waste. Once the units are removed from vehicles (and thus considered separately), they are likely to be a reactive hazardous waste.
2. What permits would be required to operate a facility that collects and deploys intact air bag units, then disposes of the deployed units as solid waste?
If a facility is collecting hazardous waste from a generator and then treating it to remove a hazardous waste characteristic it would be considered a treatment facility and would need a RCRA permit.
3. If a generator intentionally deploys an air bag unit, would that constitute generator treatment in tanks and containers which is exempt from the permitting requirements where the vehicle or the housing of the air bag unit comprises the "container"?
The intentional deployment of sodium azide containing modules could be viewed as treatment in tanks and containers since the module housing can be defined as the "container". At the federal level, these operations would be exempt from RCRA permitting in accordance with 40 CFR 270l.1 (c)(2)(i).

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