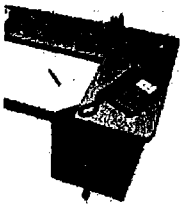

Ernest Waterman/R1/USEPA/US
01/03/2006 11:35 AM

To Tara.Davis@ebveec.com
cc Jeff Fowley/R1/USEPA/US@EPA, Ken Rota/R1/USEPA/US@EPA, Juiyu Hsieh/R1/USEPA/US@EPA, GailAnn
bcc
Subject Fw: Hazardous Waste Information

Dear Ms. Davis:

The purpose of this e-mail is to respond to your inquiry regarding the management of airbags and seatbelt pretensioners. Region 1 agrees that undeployed airbag inflation modules and similar seatbelt pretensioner modules should not be disposed of in the trash.

Noting that your facility is located within Missouri, a state covered by EPA's Region 7 office, we assume that you are trying to obtain an nationwide answer with respect to the question of whether intentional deployment is treatment that requires a permit. We, therefore, wish to direct you to Gail Cooper, Chief of the Hazardous Waste Generator and Characterization Branch, in the Office of Solid Waste to get a nationwide answer to your question.

We also wish to note that states can be more stringent than the federal government. You should, therefore, contact each specific state in which you are interested as there may be legitimate state to state variation in the correct answer to this question.

Please let me know if I can be of any further assistance.

Ernest Waterman, Chief
Hazardous Waste Unit
Office of Ecosystem Protection
US EPA, New England Region
One Congress Street
Suite 1100, CHW
Boston, MA 02114-2023

Phone: 617-918-1369
Fax: 617-918-0369

----- Forwarded by Ernest Waterman/R1/USEPA/US on 01/03/2006 11:00 AM -----

Ken Rota/R1/USEPA/US
12/08/2005 02:07 PM

To Ernest Waterman/R1/USEPA/US@EPA
cc Sharon Leitch/R1/USEPA/US@EPA, Austine Frawley/R1/USEPA/US@EPA
Subject Fw: Hazardous Waste Information

Ernie,

Austine Frawley sent me a regulatory request message that should have gone to you. I think the answer to the question is in RCRAOnline anyway but I wanted to make sure this lands in the right spot.

Ken

Kenneth B. Rota, Chief

RCRA Compliance Unit
US EPA - New England Region
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Direct Tel: (617) 918-1751
Office Fax: (617) 918-1809

----- Forwarded by Ken Rota/R1/USEPA/US on 12/08/2005 02:05 PM -----

Austine Frawley/R1/USEPA/US
12/08/2005 02:02 PM

To Ken Rota/R1/USEPA/US@EPA
cc Tara.Davis@ebveec.com
Subject Fw: Hazardous Waste Information

Hi Ken. Im forwarding you this question on air bags and seatbelt pretensioners and HW regs for response. Thanks.

Austine Frawley, US EPA-New England
Office of Ecosystem Protection (CIP)
TEL: 617/918-1065
FAX: 617/918-0065
Frawley.Austine@EPA.GOV

----- Forwarded by Austine Frawley/R1/USEPA/US on 12/08/2005 01:58 PM -----

Tara.Davis@ebveec.com
12/08/2005 11:57 AM

To Austine Frawley/R1/USEPA/US@EPA
cc
Subject Hazardous Waste Information

To Whom It May Concern,

I am writing in regards of treating airbags and seatbelt pretensioners as a hazardous waste. The air bag's inflation system reacts sodium azide (NaN3) with potassium nitrate (KNO3) to produce nitrogen gas. Hot blasts of the nitrogen inflate the air bag. The air bag system ignites a solid propellant, which burns extremely rapidly to create a large volume of gas to inflate the bag. The bag then literally bursts from its storage site at up to 200 mph. Like airbags, pretensioners are triggered by sensors in the car's body, and most pretensioners use explosively expanding gas to drive a piston that retracts the belt. Pretensioners also lower the risk of "submarining", which is when a passenger slides forward under a loosely worn seat belt.

I am aware an airbag module is considered as hazardous waste so my question is this: If an individual deploys an airbag (without a permit) on his own watch would this be considered as treating a hazardous waste? We are a hazardous waste disposal facility and this concept varies from state to state due to the interpretation of the hazardous waste regulations. To give an example: if an auto dealer receives a automobile that is to be repaired under warranty replacement and the old airbag module is removed. A new module is put in the automobile. The dealership is not allowed to just throw the airbag away in the trash or elsewhere. So if the mechanic deploys the airbag and then

discards it, would this be considered as though the dealer has treated a hazardous waste? I understand that once the airbag module is deployed it is no longer considered as a hazardous waste that is why the airbag is deployed by the individuals before discarding the equipment. The alternative to the mechanic deploying the airbag is to send the airbag as is to a hazardous waste disposal company and let them properly dispose of them. The same question for seat belt pretensioners as far as deactivating them and at that point throwing them away also.

Any assistance with clarifying what is considered treatment for these devices would be greatly appreciated. If you are unable to provide an answer please guide me in the direction to resolve the question. Thank you for taking the time in assisting me.

Best Regards,

Tara Davis
Business Development Specialist
EBV Explosives Environmental Company
tara.davis@ebveec.com