Article 27 Title 23
Vehicle Dismantling Facilities

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NYS Department of Environmental Conservation
ECL Article 27 Title 23: Vehicle Dismantling Facilities

- Signed July 28, 2006
  - Chapter 180, Laws of 2006
- Established operating, reporting, and record keeping requirements
Airbags

- ECL 27-2303(5)(e) - Airbag must be deployed or removed prior to crushing or shredding
Airbags

- **Airbag Safety and Anti-Theft Act – 1996**
  - Vehicle & Traffic Law Section 415-c(2):
    “...salvaged inflatable restraint systems shall be certified by a nationally recognized testing, engineering, and research body approved by the commissioner in consultation with the superintendent of insurance.”
  
  - No “body” established
    = effective ban on salvage airbags
Airbags

• Undeployed Airbags ~ Hazardous Waste
  – D003 Reactive

  – RCRA-C recycling exemption/scrap metal exemption
    • For airbags deployed in the car destined for recycling
Airbags

No Revenue from sale of salvage airbags

+ 

Time & Labor to deploy airbags

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Very Unhappy Dismantlers
Batteries
FLUIDS HANDLING
Parts Storage
ELV Storage or Disposal?
Mobile Homes / Trailers
NYS Department of Environmental Conservation
Thank You

QUESTIONS?

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