

From: Simoes, Steve
Sent: Tuesday, June 23, 2015 9:20 AM
To: 'Robert Stephens'
Cc: Daly, John; Metcalf, Lynn
Subject: FW: airbag disposal guidelines bulletin
Attachments: SRS disposal_PIB.pdf

Hi Robert - Attached is the Honda (and Acura) bulletin that I mentioned yesterday. In light of this, on-site treatment does not seem like a good idea - note that the bulletin references the need for "specialized facilities" to conduct safe treatment. As such, here's a link to the list of waste haulers that are permitted in Vermont; note that the haulers that are permitted to transport hazardous waste are identified with an "H" in the "Waste Type" column.

<http://www.anr.state.vt.us/dec/wastediv/solid/documents/AllWasteTransportersList.pdf>

Please let me know if you have any further questions.

Steve

-----Original Message-----

From: Steve_Osborne@ahm.honda.com [mailto:Steve_Osborne@ahm.honda.com]

Sent: Monday, June 22, 2015 4:03 PM

To: Simoes, Steve

Subject: airbag disposal guidelines bulletin

Steve

Attached is a copy of the Honda bulletin I referenced. The exact verbiage is also used in the bulletin for our Acura brand. I appreciate both your review and your feedback.

(See attached file: SRS disposal_PIB.pdf)

thank you

Steve

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Parts Information Bulletin

Disposal Guidelines for Undeployed Airbags and Other SRS Devices

Revised 2/17/14

This bulletin provides guidance on the handling and disposal of undeployed Supplemental Restraint System (SRS) devices, including airbags and seat-belt pretensioner assemblies.* This bulletin does not replace or supersede the existing controlled parts return policy in the Parts System Guide (PSG).

Best Practices

American Honda strongly recommends that dealership environmental compliance or risk management personnel:

- carefully review local and state regulations;
- provide adequate staff training to ensure consistent and compliant practices; and
- contract with a properly permitted or licensed hazardous waste transporter, disposal facility, or recycler to manage the disposal of undeployed SRS devices.

Regulatory Considerations

Undeployed SRS devices are regulated as **hazardous material** by the U.S. Department of Transportation (DOT). Federal regulations require comprehensive training for all dealership personnel who prepare, transport, or supervise transportation functions for hazardous materials. Penalties for non-compliance with regulations are significant.

SRS devices are considered to be **hazardous waste** in most states, and an extreme safety and environmental hazard by solid waste transporters and landfill operators.

In addition, federal and most state environmental agencies consider the deployment of SRS devices in order to facilitate disposal as **hazardous waste treatment**, which requires specialized facilities, training, and approval from the appropriate state environmental agency.

For the reasons outlined above, American Honda strongly advises that you use the services of a properly permitted or licensed hazardous waste transporter, disposal facility, or recycler to manage the disposal of undeployed SRS devices. Never dispose of an undeployed SRS device in the trash.

Your dealership is responsible for complying with all applicable laws and regulations. American Honda cannot provide authoritative regulatory assistance specific to your jurisdiction or facility, and thus takes no responsibility for a dealership's failure to comply with applicable laws and regulations.

* This document applies only to pyrotechnically activated SRS devices. Devices that are mechanically or electrically activated and have no pyrotechnic component are currently not considered transportation or waste hazards. However, other regulations, such as e-waste segregation and disposal, may still apply.

Bulletin Number	Issue Date	Application
A13-0022	REV: 2/17/14	Parts Policy

SRS Device Disposal Vendors

Although American Honda does not recommend a specific vendor for disposal of undeployed SRS devices, below is a list of companies that offer this service to dealers:

COMPANY	LOCATION	SERVICE AREA	PHONE/WEBSITE
Promontory Airbag Recycling Co. (PARC)	Utah	USA	800-667-4079 www.parcrecycling.com
Quest Resource Management	Texas	USA	877-321-1811 www.questrecycling.com
MKC Enterprises	Georgia	Southeast US only	800-457-6521 www.mkcenterprises.com
General Dynamics	Missouri	USA	417-624-0212 www.gd-ots.com/munitions/automotive.html

Deployed SRS Devices

SRS devices that arrive at your dealership already fully deployed or activated, such as devices that were deployed in a collision, are considered non-hazardous in most jurisdictions and may usually be disposed of as regular recyclable metal or plastic waste. However, you should still check the regulations in your jurisdiction before disposing of deployed devices.

Disclaimer

American Honda provides this guidance document as-is and cannot guarantee accuracy or completeness in all jurisdictions. American Honda strongly recommends that you consult with your jurisdiction's waste disposal regulatory agency, your current hazardous waste disposal service provider, or legal counsel for additional information or assistance.

Warranty Replacements

If you are replacing an undeployed SRS device under warranty, you may, under certain circumstances, file a warranty claim using the new sublet code **HW**, as long as you use the services of a properly permitted or licensed hazardous waste transporter, disposal facility, or recycler to dispose of the undeployed device.

The sublet policy outlined in Service Operations Manual Section 5.2.3 applies.

The replacement must not be connected to a safety recall or other campaign. If the replacement is connected to a campaign, make sure to follow all instructions, and use the warranty claim information listed, in the service bulletin.

**American Honda Motor Co., Inc.
Parts Operations**