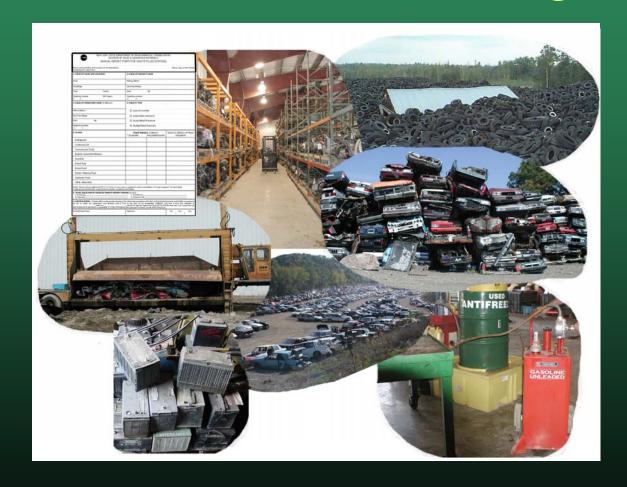
Article 27 Title 23 Vehicle Dismantling Facilities



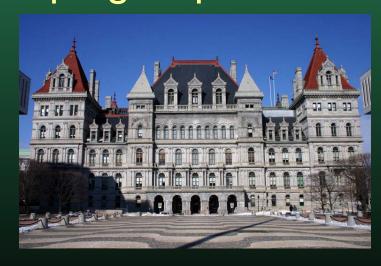
Rick Clarkson Environmental Engineer

Bureau of Solid Waste, Reduction & Recycling



ECL Article 27 Title 23: Vehicle Dismantling Facilities

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







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



- 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" establishedeffective ban on salvage airbags



- Undeployed Airbags ~ Hazardous Waste
 - D003 Reactive
 - RCRA-C recycling exemption/scrap metal exemption
 - For airbags deployed in the car destined for recycling



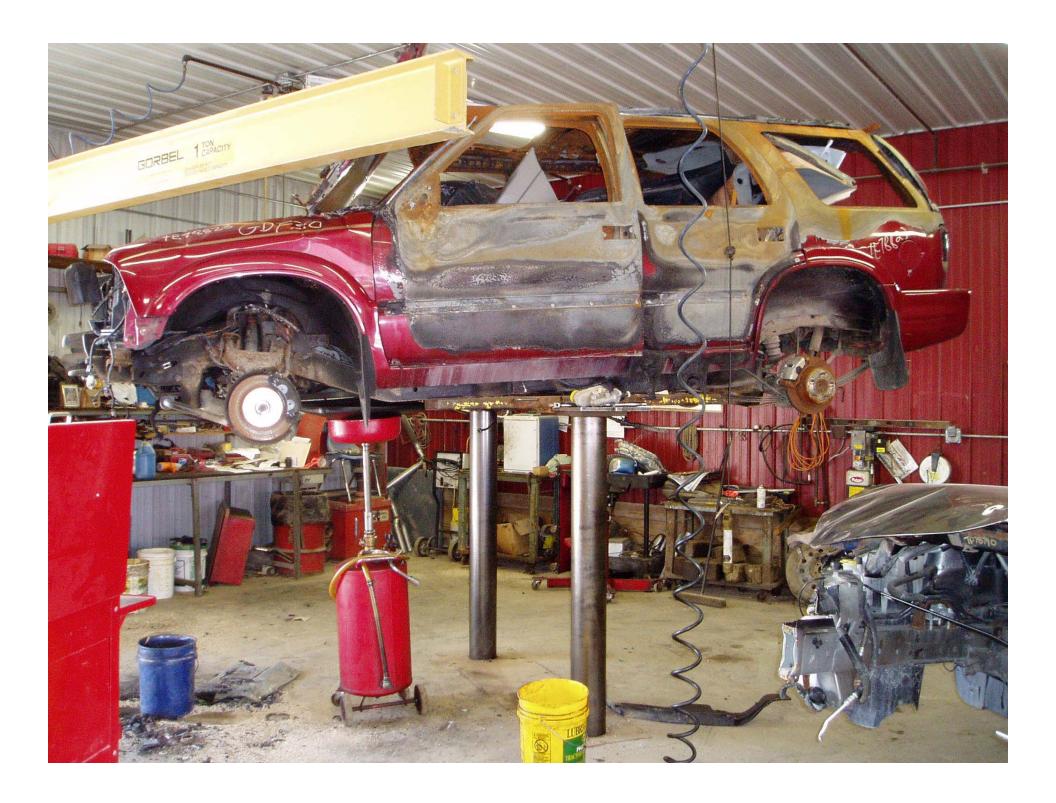
No Revenue from sale of salvage airbags

+

Time & Labor to deploy airbags

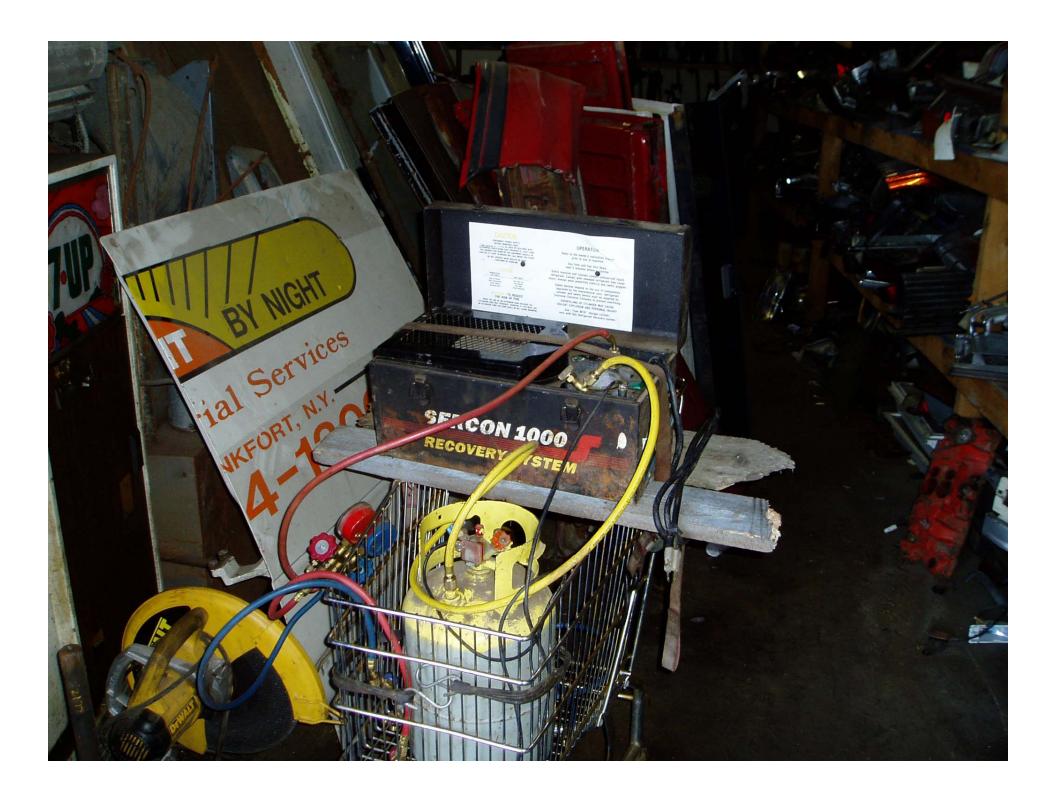
Very Unhappy Dismantlers

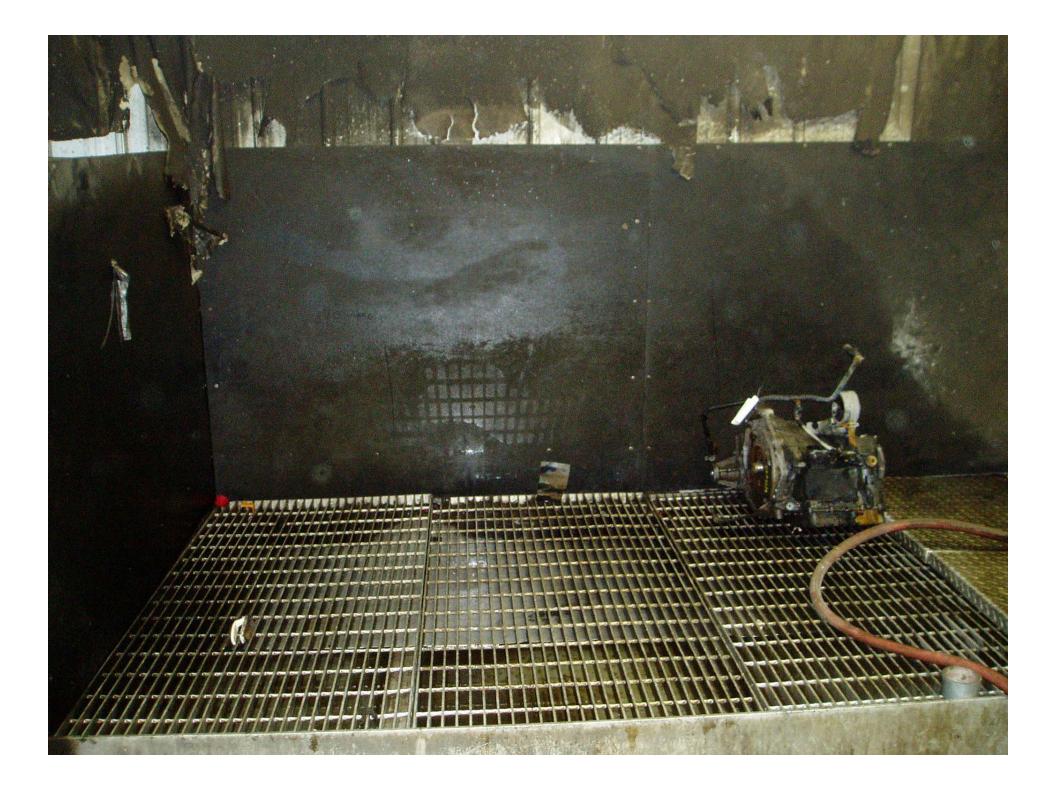














Tires













Batteries













FLUIDS HANDLING













Parts Storage



ELV Storage or Disposal?

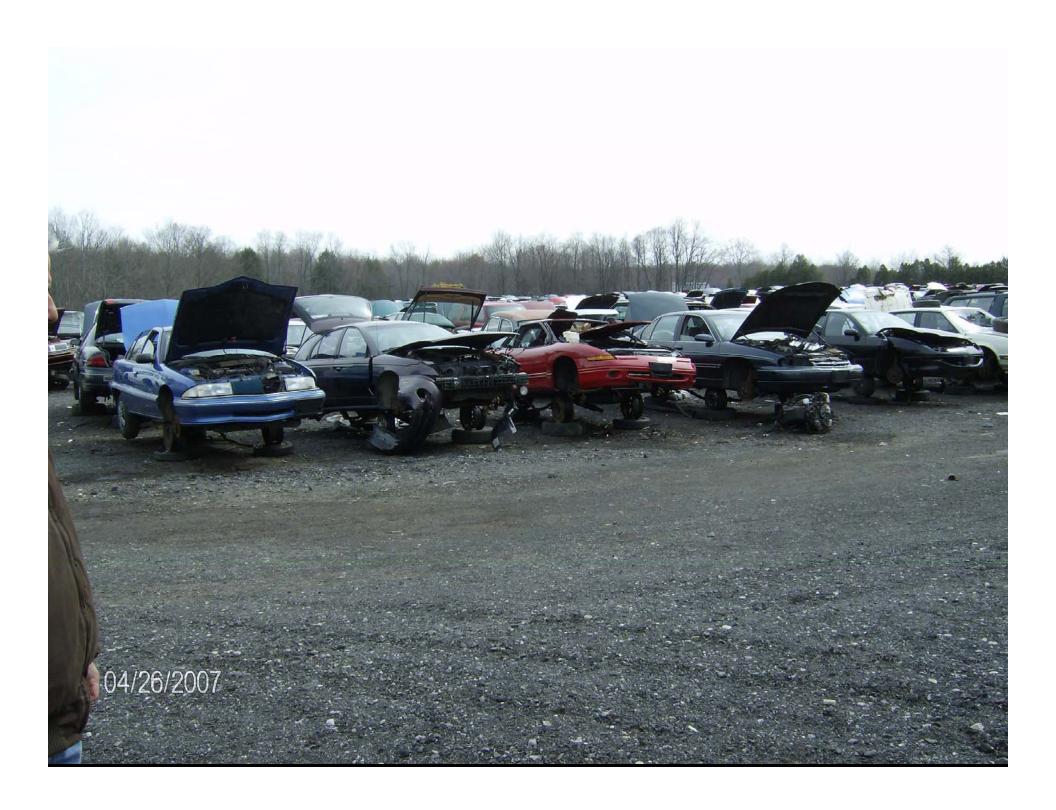


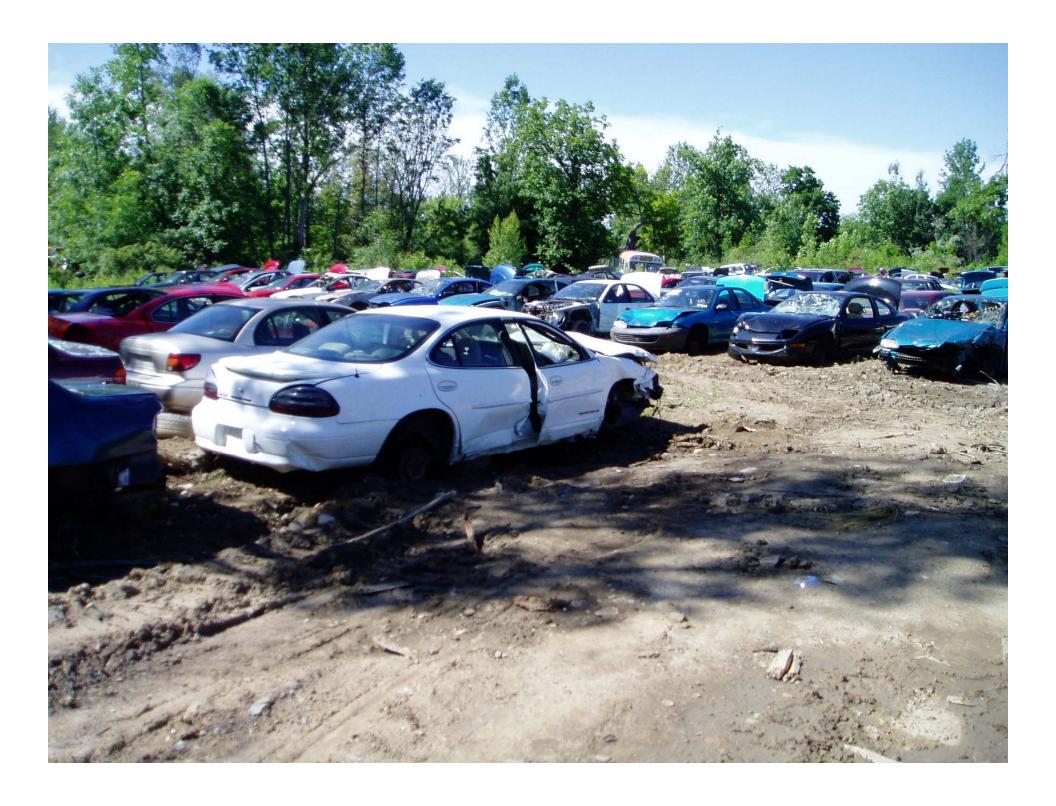


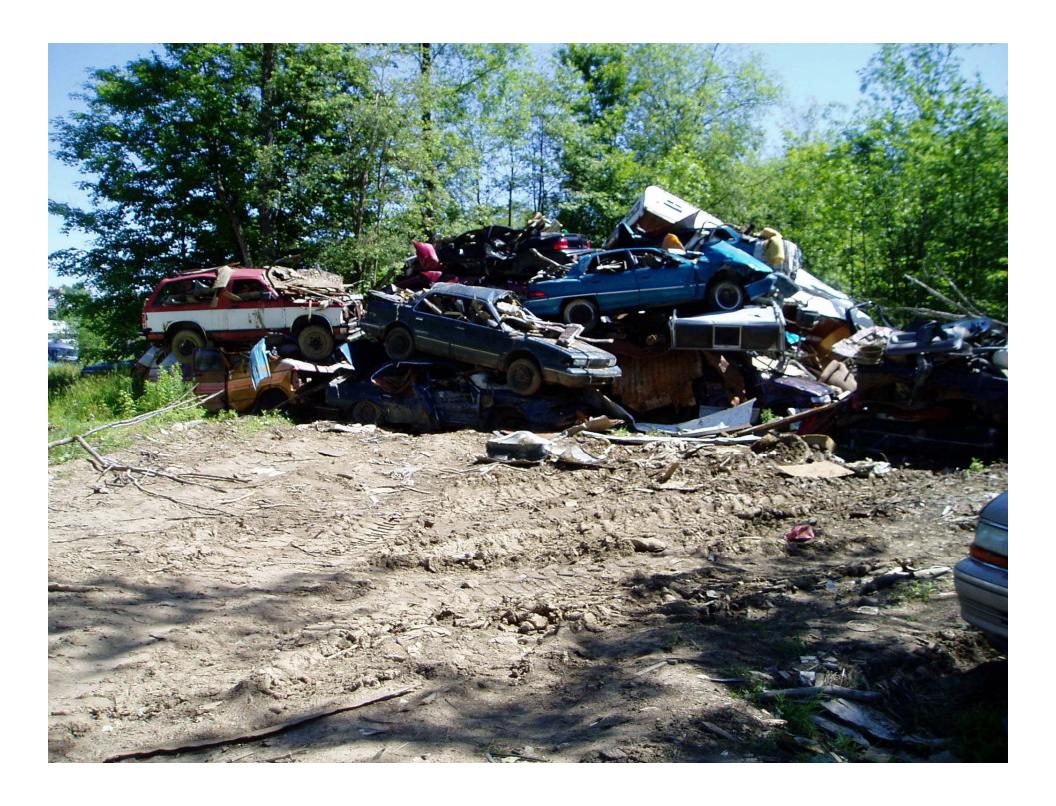


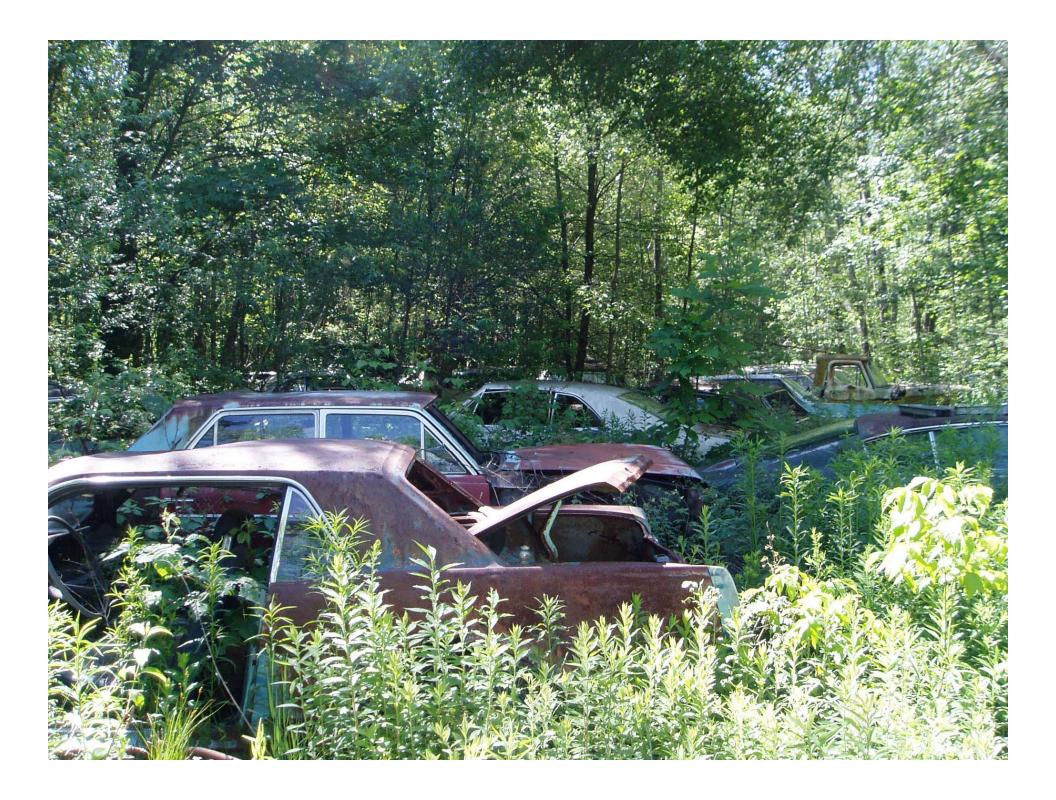


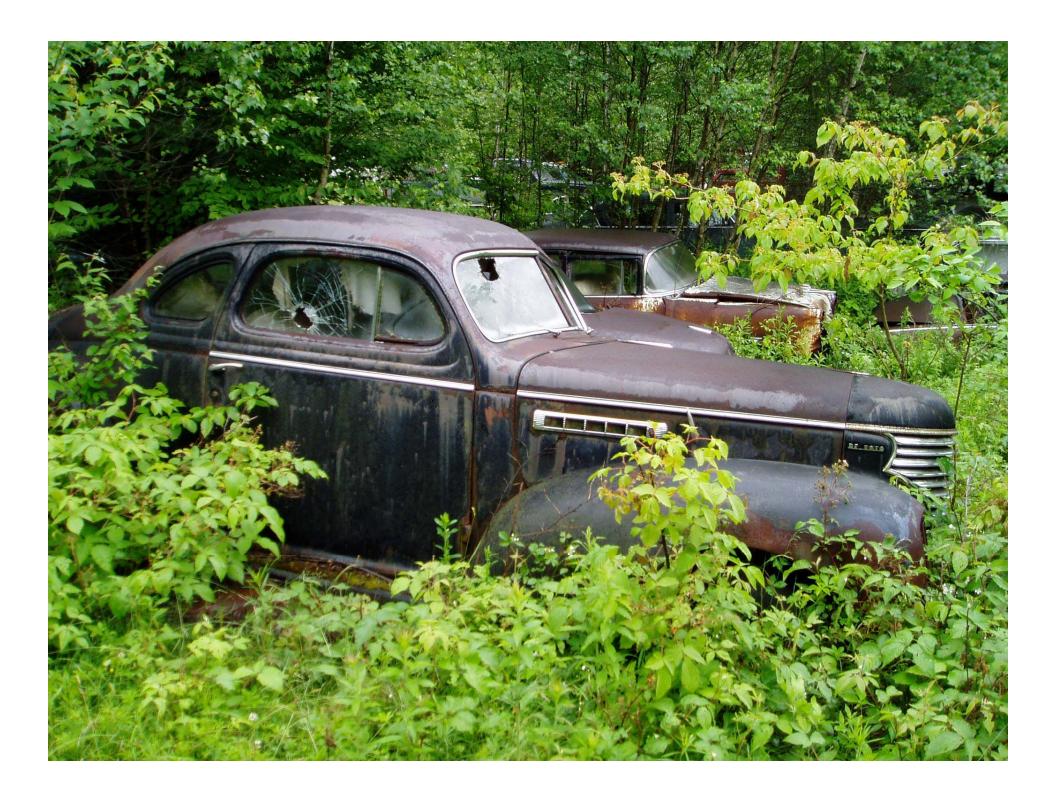












Mobile Homes / Trailers







Thank You

QUESTIONS?

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