

## July 2017 Hazardous Waste Rules - Frequently Asked Questions (FAQs)

Hawaii Department of Health (DOH), Solid and Hazardous Waste Branch

### **Q: Did DOH adopt EPA's "generator improvements rule"?**

A: No, the generator improvement rule is NOT included in the new regulations. The program does hope to adopt it next year.

### **Q: Did DOH adopt EPA's 2015 DSW or Definition of Solid Waste rule?**

A: Yes, Hawaii did adopt the 2015 DSW rule in its entirety.

### **Q: Does DOH accept the conditional exclusions for solvent contaminated wipes?**

A: Hawaii did adopt the solvent contaminated wipes conditional exclusions with one difference from the federal rule: we require the accumulation start date to be written on the container. Please see sections 40 CFR 261.4(a)(26) and (b)(18), as incorporated and amended in chapter 11-261.1, HAR in the chapter 11-261.1 guidebook with track changes. Read the first page of the guidebook for an explanation of how it works. Bookmarks in the guidebook PDF will help you find these sections easily.

### **Rule highlights -- NOT a complete list, just some ones of interest to most people. See**

<http://health.hawaii.gov/shwb/hw-rules-2017/> and <http://health.hawaii.gov/shwb/hw-rules-update/>

#### Hazardous Waste Generators

- HW determination:
  - Wastes listed solely for ignitability, corrosivity, and/or reactivity characteristics that exhibit no hazardous waste characteristics are not hazardous wastes.
  - Clarification of the scope of the ignitability characteristic, relating to compressed gasses and oxidizers.
- Container storage area inspection log requirements (SQGs and LQGs)
- Posting emergency information at nearest telephone and clearly visible from the storage area (SQGs)
- Legitimate recycling criteria
- E-manifest

#### Universal Waste

- Electronic items
- Battery labeling (pallet labeling allowed)
- Transporters: tracking of universal waste shipments
- Requirement to notify DOH of import of universal waste from another country or any state

#### Used Oil

- Testing used oil for halogen content
- Generators: tracking of used oil shipments
- Recyclers/processors: recordkeeping requirement for equipment testing/maintenance records