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.


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