

Methylene Chloride; Regulation Under the Toxic Substances Control Act (TSCA)

2024 Final Risk Management Rule - Laboratory Overview

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What is the 2024 Methylene Chloride Rule?

- EPA determined that methylene chloride presents an unreasonable risk of injury to health under its conditions of use.
- The rule prohibits most consumer, industrial, and commercial uses of methylene chloride.
- Certain uses may continue under a Workplace Chemical Protection Program (WCPP) - including use as a laboratory chemical.
- For continuing uses, the rule establishes workplace exposure limits, monitoring, exposure controls, training, and recordkeeping requirements.
- The final rule was published May 8, 2024 and became effective July 8, 2024.

Key Deadlines

Non-federal industrial/commercial laboratories - updated by EPA's 2025 compliance-date extension

Requirement	Original Deadline	Updated Deadline
Initial monitoring	May 5, 2025	November 9, 2026
Regulated areas & compliance with exposure limits	August 1, 2025	February 8, 2027
Methods of compliance & Exposure Control Plan	October 30, 2025	May 10, 2027

EPA finalized an 18-month extension for non-federal laboratories in November 2025, aligning these dates with federal laboratories and contractors.

Initial Monitoring and Exposure Limits

EPA's TSCA limits are substantially lower than the existing OSHA limits.

Exposure Measure	EPA / TSCA WCPP	OSHA Methylene Chloride Standard
8-hour TWA	ECEL: 2 ppm	PEL: 25 ppm
15-minute limit	EPA STEL: 16 ppm	STEL: 125 ppm

- Initial monitoring is used to characterize workplace exposure and determine whether additional controls or monitoring are required.
- Keep clear records of monitoring badges/sampling media, equipment used, and the workflow when monitoring is performed.
- Documentation should support that measured exposure represents the equipment and work practices actually used.

Implement Methods of Compliance

- Document the engineering controls, work practices, and PPE used to minimize methylene chloride exposure.
- Follow the hierarchy of controls: elimination/substitution where feasible, then engineering controls, administrative controls/work practices, and PPE.
- Examples for laboratory operations may include certified/local exhaust ventilation, closed or minimized-transfer practices, task-specific procedures, chemically resistant gloves, and respiratory protection when required.
- Document the effectiveness of selected controls and why controls were selected or not selected.

Workplace Chemical Protection Program (WCPP) and Exposure Control Plan

- Exposure limits (ECEL and EPA STEL)
- Initial, periodic, and additional exposure monitoring
- Regulated areas, when required
- **Exposure Control Plan documenting selected controls and the hierarchy-of-controls rationale**
- Respiratory protection and dermal PPE, when applicable
- Training for exposure prevention
- Recordkeeping and required notifications



Exposure Control Plan



Identifies exposure-control measures



Documents implementation and maintenance



Describes regulated areas and authorized entry



Addresses changes that could increase exposure



Reviewed/updated as necessary and at least every 5 years

Enforcement

\$49,772

maximum TSCA civil penalty per violation

[EPA TSCA Enforcement Information](#)

[Current civil penalty table: 40 CFR § 19.4](#)

Penalty amounts are adjusted periodically for inflation.

- EPA regulates and enforces the rule under TSCA.
- Each day a violation continues may constitute a separate violation.
- Examples of noncompliance include:
 - Failure to conduct required exposure monitoring or comply with applicable WCPP requirements
 - Failure to establish or maintain required records
 - Failure to provide required access to records or permit an EPA inspection
- Knowing or willful violations may also result in criminal penalties.

Resources

[Federal Register Final Rule](#)

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[EPA Methylene Chloride Compliance Guide](#)

A Guide to Complying with the 2024 Methylene Chloride Regulation under TSCA (RIN 2070-AK70)

[EPA General WCPP Compliance Guide](#)

A Compliance Guide for the Workplace Chemical Protection Program under the Toxic Substances Control Act (TSCA)

[EPA Fact Sheet](#)

2024 Final Risk Management Rule for Methylene Chloride under TSCA

[EPA Current Methylene Chloride Rule Page](#)

Risk Management for Methylene Chloride - includes current amendments and compliance-date updates