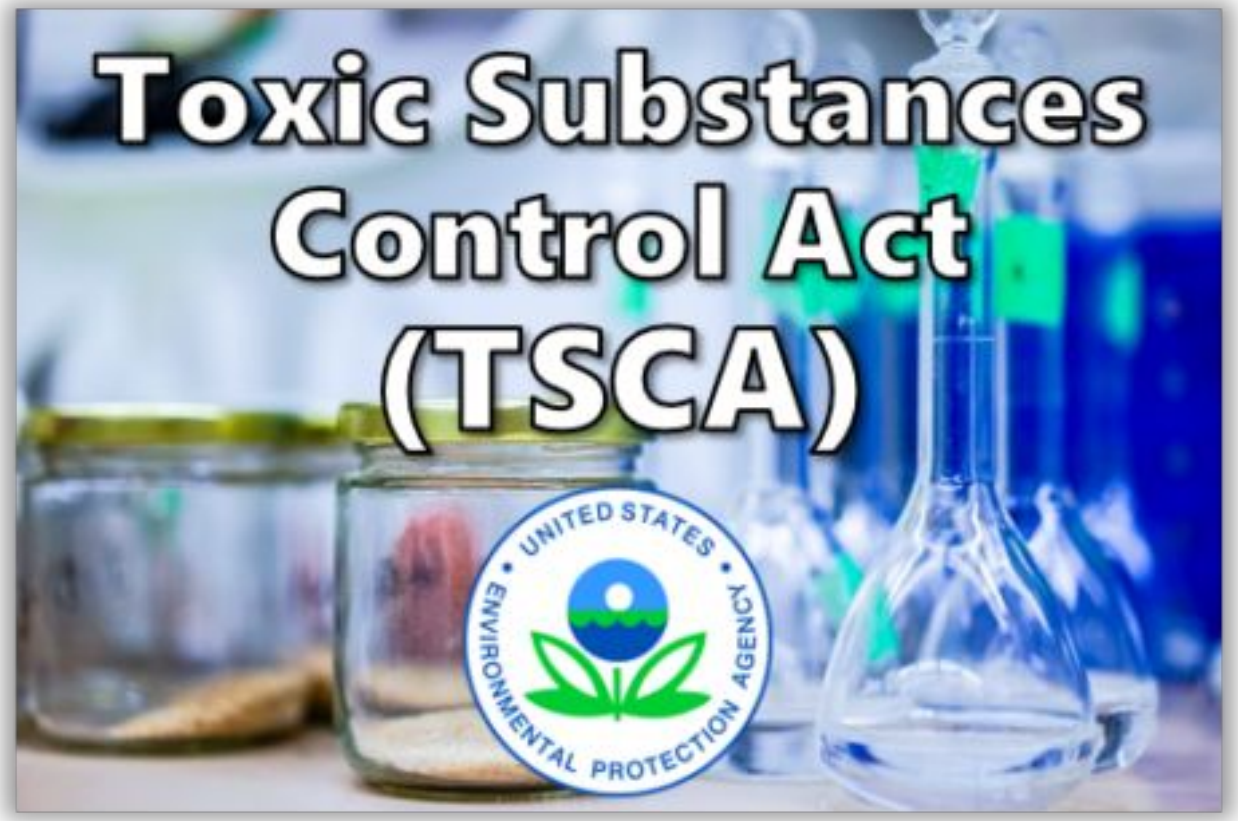
Methylene Chloride

Workplace Chemical Protection Program

Environmental Health and Safety

Michigan Tech

In April 2024, the EPA Finalized Methylene Chloride Prohibitions and Workplace Protections under the Toxic Substances Control Act (TSCA).



EPA's Final Rule:

- Determines Methylene Chloride to be an "Unreasonable" Risk.
- Prohibits manufacturing, processing and distribution of Methylene Chloride for **ALL** consumer uses.
- Prohibits most industrial and commercial uses of Methylene Chloride, including paint and coating removers.
- Creates strict workplace protections through a Workplace Chemical Protection Program to minimize risk to workers.

Why is Methylene Chloride an “Unreasonable” Risk?

- Methylene Chloride is a volatile chemical used in a wide range of industrial, commercial, and consumer applications. (Used for over 80 years with max. U.S. production in the 1970s-1980s)
- Methylene Chloride is an acutely lethal neurotoxicant, and chronic exposure can affect liver function and cause cancer. (Only Liver effects were used in the EPA Determination)
- Acute exposure resulted in at least 88 occupational deaths in the U.S. between 1985-2024.
- Between 1985 and 2017, the American Association of Poison Control recorded 37, 201 non-fatal Methylene Chloride cases.
- EPA found that 52 of 53 conditions of use of Methylene Chloride contribute to the unreasonable risk of injury to health of workers, consumers, and bystanders.

What Does This Mean for Michigan Tech?

1. All commercial/retail products containing Methylene Chloride must eliminated/substituted from campus.

1. All laboratories using Methylene Chloride must eliminate or determine an alternative substitute solvent.

1. If laboratories are unable to substitute Methylene Chloride, stringent requirements to assess and control employee exposure must be enacted. These requirements are very time consuming and expensive.

How Stringent are the New Guidelines?

Workplace Chemical Protection Program Requirements

Initial Monitoring	Exposure Limits and Dermal Protections	Exposure Control Plan	Other Monitoring
Complete initial monitoring. Demarcate regulated area within 3 months of initial monitoring data. Provide respiratory protection within 3 months of initial monitoring data but no later than 15 months after final rule. .	Ensure Methylene Chloride inhalation exposures do not exceed the ECEL (2 ppm as an 8-hr TWA) and EPA STEL (16 ppm as a 15-min TWA) for all potentially exposed persons. Provide respiratory and/or dermal protection if applicable.	Develop and implement an exposure control plan. Notify potentially exposed persons of completion of exposure control plan within 30 days of its completion. Provide requested records by a potentially exposed person within 15 days of request.	Periodic Monitoring Conduct at a minimum every 5 years, but could occur as frequently as every 3 months, dependent upon initial monitoring results. As Needed Monitoring Conduct additional monitoring after any change.

What does this mean for Michigan Tech?

Methylene Chloride Rule Timeline

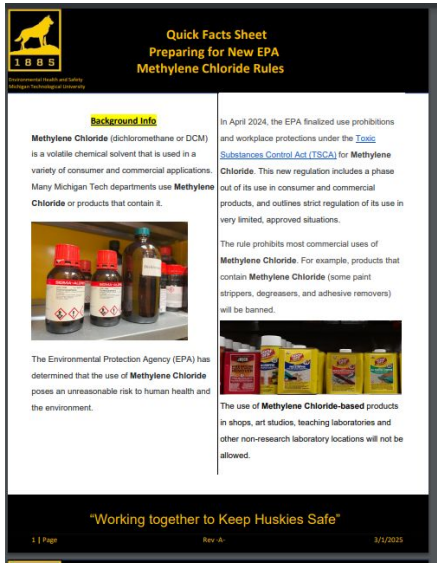
1. March - April 2025:
   - Departments inventory workspaces for Methylene Chloride.
   - Ensure all items are inventoried in SDS Online.
   - Determine if use is allowed.
   - Replacement chemicals are identified and implemented.
   - EHS meets with Laboratory Personnel.

2. May- June 2025:
   - EHS conducts exposure monitoring where Methylene Chloride is allowed and cannot be replaced or eliminated.

3. Before October 30, 2025:
   - Laboratories allowed to use Methylene Chloride are required to implement an exposure control plan.

4. After April 28, 2026:
   - The University will be prohibited from industrial or commercial use of Methylene Chloride. (except for allowed uses)

EHS Resources for Researchers


Quick Facts Sheet
Preparing for New EPA
Methylene Chloride Rules

Background Info

Methylene Chloride (dichloromethane or DCM) is a volatile chemical solvent that is used in a variety of consumer and commercial applications. Many Michigan Tech departments use **Methylene Chloride** or products that contain it.

The Environmental Protection Agency (EPA) has determined that the use of **Methylene Chloride** poses an unreasonable risk to human health and the environment.

In April 2024, the EPA finalized use prohibitions and workplace protections under the Toxic Substances Control Act (TSCA) for **Methylene Chloride**. This new regulation includes a phase out of its use in consumer and commercial products, and outlines strict regulation of its use in very limited, approved situations.

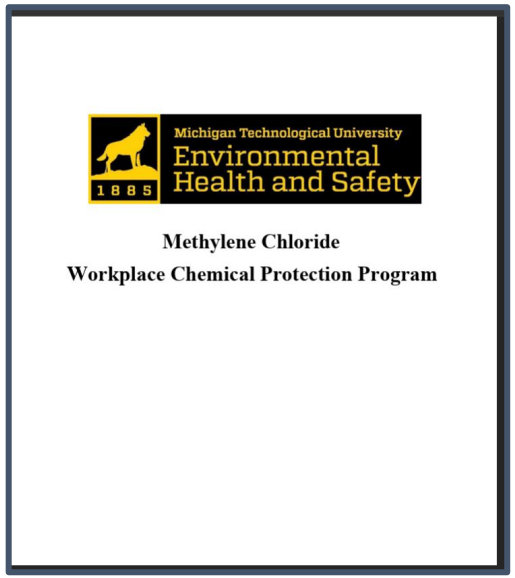
The rule prohibits most commercial uses of **Methylene Chloride**. For example, products that contain **Methylene Chloride** (some paint strippers, degreasers, and adhesive removers) will be banned.

The use of **Methylene Chloride-based** products in shops, art studios, teaching laboratories and other non-research laboratory locations will not be allowed.

"Working together to Keep Huskies Safe"

1 | Page Rev -A- 3/1/2025

Methylene Chloride Fact Sheet


Michigan Technological University
Environmental Health and Safety

Methylene Chloride
Workplace Chemical Protection Program

Methylene Chloride Workplace Chemical Protection Program


Methylene Chloride Exposure Control Plan

Michigan Technological University Environmental Health and Safety

This form is automatically collecting emails from all respondents. Change settings

Revision Log - 03/2025 - Revision A - Issuance

Michigan Technological University
Environmental Health and Safety

Appendix A - Methylene Chloride Exposure Control Plan

In compliance with the Michigan Tech's **Methylene Chloride Workplace Chemical Protection Program (WCPP)**, all laboratories conducting operations involving methylene chloride, or any mixture containing methylene chloride at or above 0.1% concentration, must complete an Operation Specific

Methylene Chloride Exposure Control Plan Fillable Template

What About Home Use??

Prohibition of Consumer Use

- EPA determined Methylene chloride could not be used safely in consumer products.
- Prohibits manufacturing (including import), processing, and distribution for consumer use, and provides time for retailers to phase out their consumer product inventory
- In almost all cases, alternatives are available.
- Commercial applications began phasing out as early as 2019.

Prohibited manufacture, processing, and distribution of Methylene Chloride for all consumer use, including:

- Solvent in aerosol degreasers/cleaners
- Adhesives and sealants
- Brush cleaners for paints and coatings
- Adhesive and caulk removers
- Metal degreasers
- Automotive care products

- Automotive care products (degreasers)
- Lubricants and greases
- Cold pipe insulation
- Arts, crafts, and hobby materials glue
- Anti-spatter welding aerosol
- Carbon removers and other brush cleaners

So How Do You Safely Dispose of Household Solvents?

1. Locate Your Local HHW Program:

Search online or call your local county or city's recycling or waste management department to find the nearest HHW drop-off location or collection event.

Baraga	Keweenaw Bay Indian Community, Natural Resources Department 16278 Ojibwa Industrial Park Rd. Baraga, MI 49908	Dione Price 906-524-8700 dprice@kbic-nsn.gov

2. Prepare Your Solvents:

- **Check the label:** Some solvent containers will have specific disposal instructions.
- **Triple Rinse:** Empty and thoroughly rinse any remaining solvent from the container with water.
- **Label:** Clearly label any remaining solvent containers with "Hazardous Waste".
- **Secure Containers:** Place solvents in a secure, tightly capped, and leak-proof container, especially if they are flammable.

So How Do You Safely Dispose of Household Solvents? (Part II)

Never:

- **Pour solvents down the drain.** This can pollute the environment.
- **Throw solvents into the regular trash.** This poses a risk to waste management personnel and can contaminate the environment.

Working Together to Keep Huskies Safe!!!

Questions?

Contact:

Ehs-Help@MTU.edu

We Can Help!