

EPA Final Methylene Chloride Rule: Laboratory Announcement

Introduction In April 2024, the Environmental Protection Agency (EPA) issued a [final rule](#) regulating methylene chloride (CAS# 75-09-2, also identified as dichloromethane or DCM) under the Toxic Substances Control Act (TSCA). Campus research operations that use this material will be impacted.

Impact The new EPA rule is not aligned with the existing OSHA requirements for recordkeeping or exposure limits. The structure of this regulation is a significant departure for laboratories that have functioned under the provisions of the performance-oriented Occupational Safety and Health Administration (OSHA) Occupational Exposure to Hazardous Chemicals in Laboratories (29 CFR 1910.1450), and requirements may also differ from existing state regulations for methylene chloride.

This rule applies to all products and mixtures containing 0.1% or more methylene chloride. All laboratories will need to complete the actions identified in the timeframe listed below to continue the use of methylene chloride.

Research budgets could be impacted as increasing costs in the manufacture and import of methylene chloride are anticipated in the near future.

Initial Laboratory Required Actions

Laboratories will need to:

1. **Complete the Methylene Chloride Use Survey and submit along with SOP ([template in Chemical Hygiene Plan](#)) to EHS@uhcl.edu by May 1st.**
2. Identify all uses of Methylene Chloride (MC) in laboratory operations.
3. Update and maintain chemical inventory identifying current stock of all products and mixtures containing 0.1% or more methylene chloride.
4. Determine and document the need for continued use.
 - a. Only strong justification will be considered why a substitute cannot be used.
 - b. If a substitute can be used, or if use is terminated, submit any remaining MC stocks as hazardous waste to EHS.
5. Coordinate with UHCL EHS to complete baseline exposure monitoring in summer 2025. (All uses require)
6. Enroll all users in Methylene Chloride Workplace Chemical Protection Program (WCPP). Many requirements apply and will be online soon for DCM and WCPP.

Campus Timeline

Action	Date
Update your chemical inventory, identifying current stock of methylene chloride.	(Now)
Identify all uses of methylene chloride.	(Now)
Complete Methylene Chloride use survey.	(May 1st, 2025)
EHS will review your submittal and schedule baseline study.	Summer 2025
Chemical Hygiene Plan updated with WCPP.	October 30th, 2025