

## EPA Final Methylene Chloride Rule: Laboratory Guide

**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 which 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 actions identified by **FIU EH&S** in the timeframe listed below to continue the use of methylene chloride moving forward.

Research budgets will be impacted, as increasing costs in the manufacture and import of methylene chloride are anticipated.

**Initial  
Laboratory  
Required  
Actions**

Laboratories will need to:

1. Update and maintain chemical inventory identifying current stock of all products and mixtures containing 0.1% or more methylene chloride.
2. Identify all uses of methylene chloride in laboratory operations.
3. Complete the [methylene chloride use form](#) and [methylene chloride use survey](#).
4. Determine and document need for continued use. Continued use will only be approved if an allowed justification is provided that identifies why a substitute cannot be used.
  - a. If substitutes can be used or if use is terminated, submit any remaining stocks as hazardous waste.
5. Coordinate with **FIU EH&S** for guidance on completing baseline exposure monitoring.
  - a. Uses starting after May 5, 2025, will need to be documented and monitored within 30 days.
  - b. Continued monitoring will occur for all continued use with periodic retesting (a minimum of every five years, but could be as frequently as every 3 months, depending on the results).
6. Ensure task-specific training is completed and documented; keep training records for at least 5 years.
7. Notify **FIU EH&S** of any new procedure or procedure changes (e.g., engineering controls, quantities).
8. Complete all required elements outlined in the [Workplace Chemical Protection Program \(WCPP\) document](#).

**Campus  
Timeline**

| <b>Action</b>  | <b>Date</b>             |
|--|-------------------------|
| Update chemical inventory identifying current stock of methylene chloride. | <b>April 11, 2025</b>   |
| Identify all uses of methylene chloride.                                   | <b>April 11, 2025</b>   |
| Complete methylene chloride use survey.                                    | <b>April 18, 2025</b>   |
| Complete baseline monitoring.  | <b>May 5, 2025</b>      |
| Complete WCPP requirements.  | <b>October 30, 2025</b> |