

EHS BULLETIN

UPDATED JUNE 2, 2025

University Compliance with the Methylene Chloride (DCM) EPA Final Rule

The Environmental Protection Agency (EPA) recently finalized new regulations governing methylene chloride (DCM), effective July 8, 2024. These regulations introduce requirements for the use, handling, and inventory management of DCM to protect our campus community. Environmental Health and Safety (EHS) has conducted comprehensive research, benchmarked policies against peer and aspirational institutions, and reviewed best practices and compliance strategies. As a result, EHS has developed guidelines to ensure efficient and effective compliance with these new regulatory standards. **We strongly urge departments and laboratories to prioritize eliminating or substituting DCM with safer alternatives.** Proactively removing or replacing DCM significantly reduces hazards to personnel, streamlines regulatory compliance processes, and minimizes associated financial burdens. **Departments opting to continue using DCM may incur additional costs related to compliance**, including air monitoring requirements, specialized personal protective equipment (PPE), mandatory training sessions, comprehensive recordkeeping, and heightened regulatory oversight.

Requirements

1. Inventory Assessment (K-State Deadline - June 30, 2025)

All departments must report their current use and storage of DCM to the Environmental Health and Safety (EHS) Office by **June 30, 2025**. **Complete the Methylene Chloride Inventory Survey:** <https://forms.office.com/r/BLjWvvfWGg>.

2. Procurement Approval (K-State Deadline - Effective Immediately)

Any future purchases of DCM must receive prior approval from the EHS Office **immediately**. **Please send purchase requests to safety@ksu.edu**. Any products containing 0.1% of DCM or greater fall under the EPA New Rule.

3. Exposure Monitoring and Exposure Limits (EPA Proposed Deadline November 9, 2026)

All facilities/ laboratories declaring use of DCM must undergo initial monitoring to establish baseline exposure at the cost of the facility/laboratory/department. Facilities must establish and maintain exposure levels below the Existing Chemical Exposure Limit (ECEL) of 2 parts per million (ppm) as an 8-hour time-weighted average (TWA) and ensure short-term exposure does not exceed the Short-Term Exposure Limit (STEL) of 16 ppm over a 15-minute TWA.

4. Mandatory Training (K-State Offering Starting in July 2025)

Training sessions addressing new DCM handling protocols and safety measures will begin **July 2025**. **All personnel using or working in areas that use Methylene Chloride must attend.**

5. Workplace Chemical Protection Program (WCPP) (EPA Proposed Deadline May 10, 2027)

Departments using DCM must implement a comprehensive Workplace Chemical Protection Program.

6. Respiratory Protection, where above exposure limit (EPA Proposed Deadline February 8, 2027)

Departments must ensure that appropriate respiratory protection equipment is available and in use by **February 8, 2027**.

7. Regulated Area Demarcation (EPA Proposed Deadline February 8, 2027)

All regulated areas where Methylene Chloride may exceed established exposure limits must be demarcated by **February 8, 2027**. Signage, access controls, training, and recordkeeping. Include these details in your WCPP.

References: AIHA Synergist Complying with EPA's Methylene Chloride Rule; EPA Compliance Guide, November 2024; Green Chemistry Teaching and Learning Community Methylene Chloride Replacements; Laboratory Safety Institute (LSI) Methylene Chloride Webinars and FAQs, 2024-2025 ; EPA Methylene Chloride Final Rule

**If you have questions, or need additional information,
contact KSU EHS at 785.532.5856 for assistance.**