Methylene Chloride: Regulatory Compliance & Risk Management

American Society of Safety Professional/American Industrial Hygiene Association – Chapter Meeting

Matt Harper, CIH, CSP
Principal Consultant
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Presenter Introduction

Matt Harper, CIH, CSP

- Principal Consultant with BSI
- Based in Portland, OR
- ~ 15 Year of EHS Consulting Experience
- Focused industry sectors include manufacturing, construction and government

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What we'll cover

- **Introduction to BSI**
- **EPA TSCA – Brief Overview**
  - Locating TSCA-related information
  - EPA Process
  - Conditional Uses
  - Workplace Chemical Protection Program (WCPP) Final Rules
- **OSHA-Specific Methylene Chloride Standard**
- **OSHA and EPA MOU**
  - OSHA Enforcement
- Hazard Recognition
- Risk-Based Decision Making
- Evaluating Safer Choices

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Introduction to BSI

BSI Consulting provides a comprehensive range of strategic, management and technical consulting solutions. We take a partnership approach to our client engagements to ensure we meet the needs of our clients at the scale they require. Our deep bench of technical experts maintain the latest credentials and training in Environmental, Health, Safety, and Sustainability to ensure our clients achieve the highest levels of confidence and versatility.

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Methylene Chloride Hazards

Methylene chloride is a solvent which is used in many types of work activities, such as paint stripping, polyurethane foam manufacturing, and cleaning and degreasing.

Employees exposed to methylene chloride are at increased risk to the following:

- Cancer
- Adverse effects on the heart, central nervous system and liver, and skin and eye irritation.

Exposure may occur through inhalation, by absorption through the skin, or through contact with the skin.

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Toxic Substances Control Act (TSCA)

Seeking expertise or want to get involved?

- **EPA website**: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/
  - Meetings, Webinars, and Other Engagement Opportunities for each existing chemical under review
  - EPA Points of Contact for each chemical risk evaluation

    https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/ongoing-and-completed-chemical-risk-evaluations-under
- American Council of Governmental Industrial Hygienists (**ACGIH**)
  - ACGIH On-Demand Webinars, 2024. TSCA Webinar Series.

  https://www.acgih.org/professional-development/professional-development/webinars/
- American Industrial Hygiene Association (AIHA) **TSCA Task Force**
  - https://www.aiha.org/get-involved/volunteer-groups/advisory-groups-and-other-project-teams/aiha-seeks-volunteers-to-serve-on-new-aiha-tsca-task-force

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How does OSHA’s approach to worker standards differ from the EPA TSCA approach?

OSHA

- Advisory committees
- NIOSH recommendations
- Standards adoption
- Emergency Temporary Standards
- Appeals
- Variances
- Public Petitions

EPA TSCA

- Specific chemical substances
- Best available science
- Technical reviews
- Audits and studies
- Public input
- Risk Evaluation
- Risk Management

Source: OSHA Standards Development Website. https://www.osha.gov/laws-regs/standards-development

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Chemical Risk Evaluations Under TSCA

38

Existing chemicals have either undergone or are currently undergoing risk evaluation

445

TSCA **new** chemicals under review (3/6/25)*

Sources:

(1) EPA website. Ongoing and Completed Chemical Risk Evaluations under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/ongoing-and-completed-chemical-risk-evaluations-under
(2) American Chemistry Council website. TSCA New Chemicals Under Review Tracking. https://www.americanchemistry.com/better-policy-regulation/chemical-management/toxic-substances-control-act-tsca/tsca-new-chemicals-under-review-tracking

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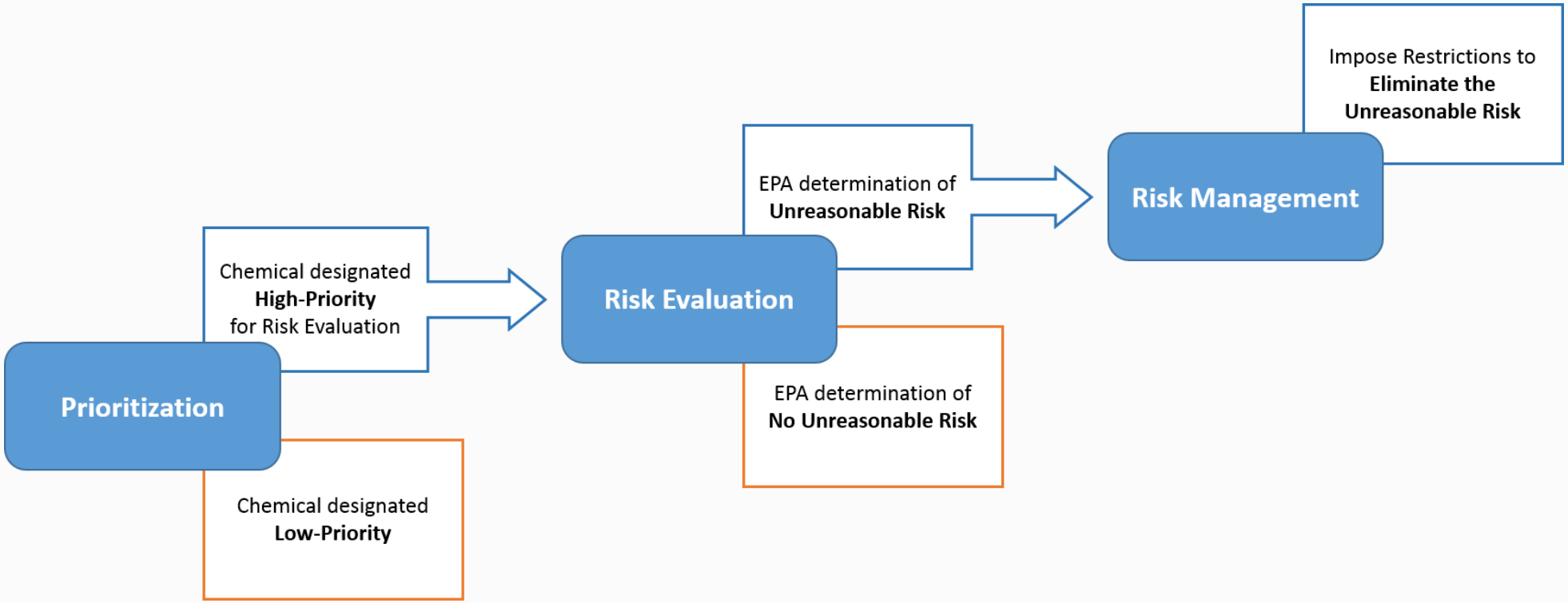
Toxic Substances Control Act (TSCA) of 1976
Frank R. Lautenberg Chemical Safety for the 21st Century Act (2016)



Source: EPA Website. Summary of the Toxic Substances Control Act. https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act
Graphic: How EPA Evaluates the Safety of Existing Chemicals, https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/how-epa-evaluates-safety-existing-chemicals

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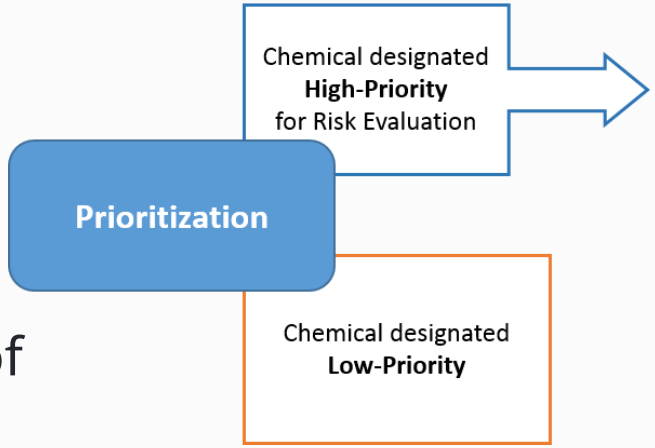
EPA Prioritization

Determine if chemical substances are a **high-** or **low-priority** for **risk evaluation**

- Persistence and bioaccumulation
- Potentially Exposed Susceptible Subpopulations (PESSs)
- Storage near significant sources of drinking water.
- Conditions of Uses (COU) or significant changes in the COUs
- Production volume or significant changes in production volume of the chemical substance manufactured or processed.



Source: EPA Website. Prioritization Actions Under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/prioritization-actions-under-tsca

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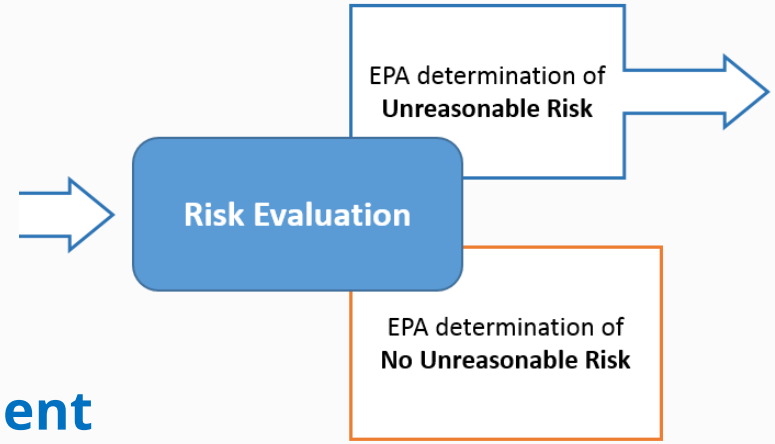
EPA Risk Evaluations

- EPA-initiated
- Manufacturer-requested
- Specific to each chemical substance under evaluation
  - Predictive modeling
  - Available data
- Extensive review period
  - Draft **scope** of the risk evaluation: **45-day public comment period**
  - Final scope within 6 months of initiating the risk evaluation
  - Draft **peer-reviewed risk evaluation** : **60-day public comment period**
  - Final risk evaluation no later than 3 to 3.5 years after identification of the High Priority Substance.



Source: EPA Website. Prioritization Actions Under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/prioritization-actions-under-tsca

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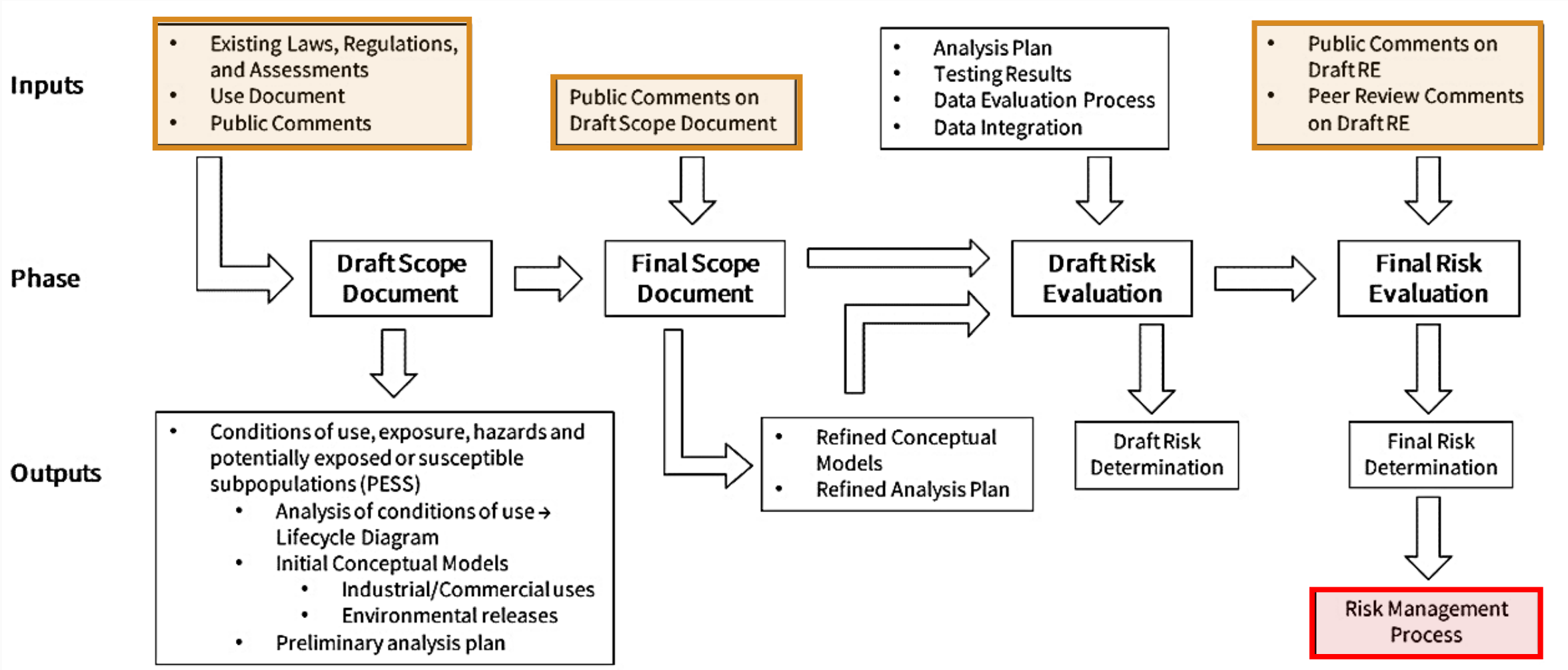
EPA Risk Evaluations
High priority existing chemicals



Source: EPA Website. Risk Evaluations for Existing Chemicals under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-evaluations-existing-chemicals-under-tsca#determination

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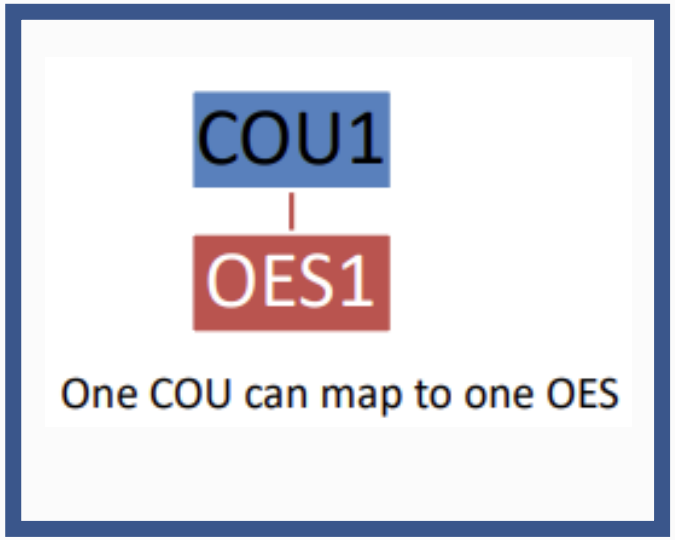
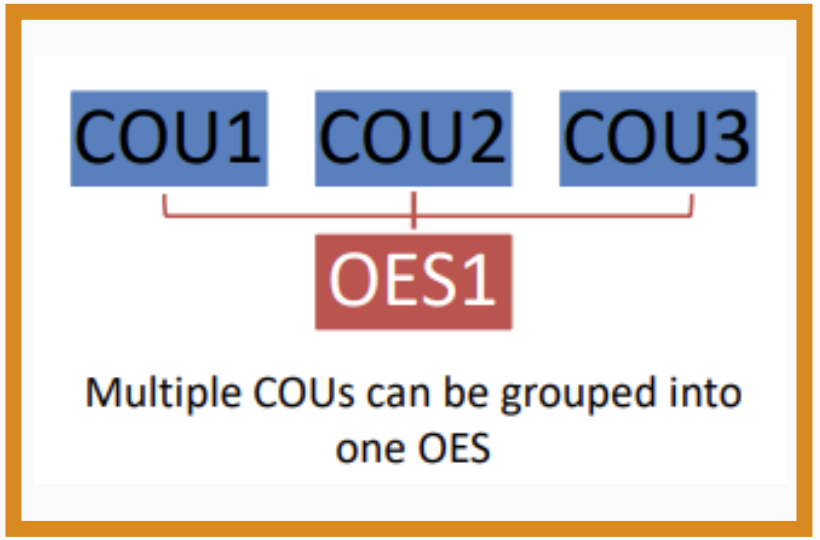
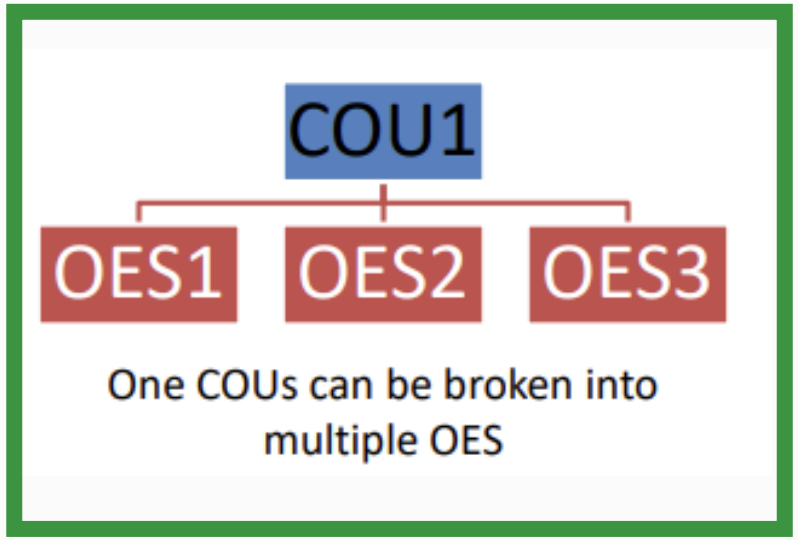
Conditions of Use (COU) & Occupational Exposure Scenarios (OES)







Source: EPA Document. Development of OESS. https://www.epa.gov/system/files/documents/2023-12/development-of-oess2.pdf
ACGIH On-Demand Webinars, 2024. TSCA Webinar Series. https://www.acgih.org/professional-development/professional-development/webinars/

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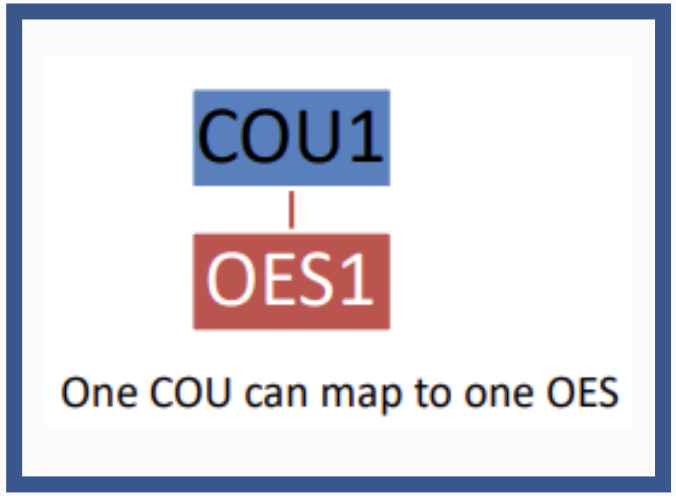
EPA Final Risk Evaluation – Methylene Chloride

Table 2-22. Crosswalk of COU to Occupational and Consumer Scenarios Assessed in Risk Evaluation

Life Cycle Stage	Category [a]	Subcategory [b]	Occupational Scenario	Consumer Scenario
		preparation manufacturing		
		Propellants and blowing agents for plastics product manufacturing		
		Paint additives and coating additives not described by other codes		
		Laboratory chemicals for all other chemical product and preparation manufacturing		
		Laboratory chemicals for other industrial sectors		
		Processing aid, not otherwise listed for petrochemical manufacturing		
		Adhesive and sealant chemicals in adhesive manufacturing		
		oil and gas drilling, extraction, and support activities		
	Repackaging	Solvents (which become part of product formulation or mixture) for all other chemical product and preparation manufacturing	Repackaging	N/A
		all other chemical product and preparation manufacturing		
	Recycling	Recycling	Waste Handling, Disposal, Treatment, and Recycling	N/A
Distribution in commerce	Distribution	Distribution	Repackaging	
Industrial, commercial	Solvents (for cleaning or	Batch vapor degreaser (e.g., open-top, closed-	Batch Open-Top Vapor Degreasing	N/A



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EPA Final Risk Evaluation – Methylene Chloride

Table 2-22. Crosswalk of COU to Occupational and Consumer Scenarios Assessed in Risk Evaluation

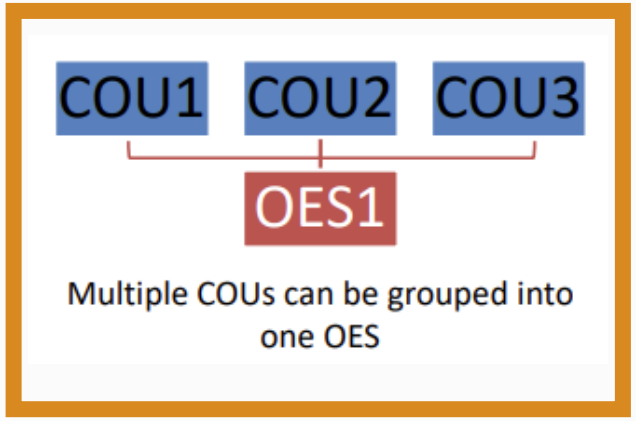

Table 2-22. Crosswalk of Conditions of Use to Occupational and Consumer Scenarios Assessed in the Risk Evaluation

Life Cycle Stage	Category [a]	Subcategory [b]	Occupational Scenario	Consumer Scenario
Manufacturing	Domestic manufacturing	Manufacturing	Manufacturing	N/A
	Import	Import	Repackaging	N/A
Processing	Processing as a reactant	Intermediate in industrial gas manufacturing (e.g., manufacture of fluorinated gases used as refrigerants)	Processing as a Reactant	N/A
		Intermediate for pesticide, fertilizer, and other agricultural chemical manufacturing		
		Petrochemical manufacturing		
		Intermediate for other chemicals		
	Incorporated into formulation, mixture, or reaction product	Solvents (for cleaning or degreasing), including manufacturing of: • All other basic organic chemical • Soap, cleaning compound and toilet preparation	Processing - Incorporation into Formulation, Mixture, or Reaction Product	N/A
		Solvents (which become part of product formulation or mixture), including manufacturing of: • All other chemical		

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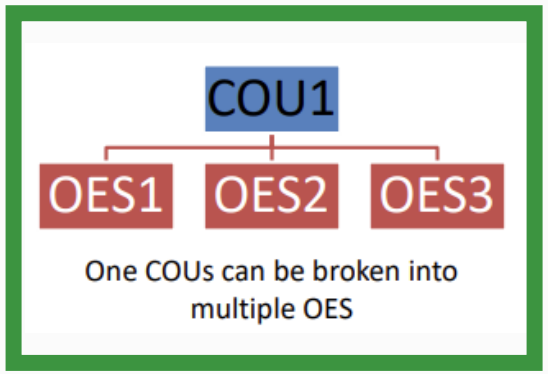
EPA Final Risk Evaluation – Methylene Chloride

Table 2-22. Crosswalk of COU to Occupational and Consumer Scenarios Assessed in Risk Evaluation



Life Cycle Stage	Category [a]	Subcategory [b]	Occupational Scenario	Consumer Scenario
	Other Uses	Laboratory chemicals - all other chemical product and preparation manufacturing	Laboratory Use	N/A
		Electrical equipment, appliance, and component manufacturing	Miscellaneous Non-Aerosol Industrial and Commercial Uses	N/A
		Plastic and rubber products	Plastic Product Manufacturing	N/A
			Cellulose Triacetate Film Production	N/A
		Anti-adhesive agent - anti-spatter welding aerosol	Commercial Aerosol Products (Aerosol Degreasing, Aerosol Lubricants, Automotive Care Products)	Weld Spatter Protectant
		Oil and gas drilling, extraction, and support activities	Miscellaneous Non-Aerosol Industrial and Commercial Uses	N/A
		Toys, playground, and sporting equipment - including novelty articles (toys, gifts, etc.)	Miscellaneous Non-Aerosol Industrial and Commercial Uses	N/A

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Manufacturers & Processes

EPA risk management actions would apply only to COU that EPA found to present unreasonable risk.

- **Prohibit** or otherwise **restrict**, or **limit** the **manufacture, processing or distribution** in commerce of the substance or mixture and/or
  - **For** a **particular use**
  - **Above a set concentration for a particular use**.
- **Minimum warnings and instructions**
  - Use, distribution in commerce, or disposal.
- **Recordkeeping, monitoring,** or **testing by manufacturers and processors**.
- **Prohibit** or regulate **manner** or **method of:**
  - **Commercial use**.
  - Method of **disposal**.
- **Direct manufacturers/processors** to **give notice** of the determination of risk **to distributors and users** and **replace or repurchase**.

Source: EPA Website. Prioritization Actions Under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-existing-chemicals-under-tsca

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Manufacturers & Processes

EPA risk management actions would apply only to COU that EPA found to present unreasonable risk.

- Manufacturing, import, and release restrictions
- Training
- Recordkeeping
- Signage in regulated areas
- Worker protection

- EPA worker exposure standards
  - **ECEL - Existing Chemical Exposure Limit**
  - STEL – Short Term Exposure Limit
- WCPP
  - Exposure assessment
  - Management plan

Source: EPA website. https://www.epa.gov/system/files/documents/2025-01/epa-and-osha-tsca-section-6-mou.pdf

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Methylene Chloride
CAS: 75-09-2

Initial Exposure Monitoring Timeline	EPA ECEL (TWA-8) [Action Level] EPA STEL	OR-OSHA PEL (TWA-8) [Action Level]	OR-OSHA (OSHA 1989) (TWA-8) [Action Level]	ACGIH TLV-TWA	CAL/OSHA PEL
Existing Facilities **Before May 5, 2025** **New** Facilities **Within 30 days** of initiating use.	**2 ppm** **[1 ppm]** **16 ppm**	25 ppm [12.5 ppm]	Refers to 29 CFR 1910.1052.	50 ppm [1997] A3; BEI	PEL-TWA 25 ppm (87 mg/m³) PEL-STEL 125 ppm (435 mg/m³)

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Workplace Chemical Protection Program & Rule Dates

A WCPP is required in order to continue 13 COU of methylene chloride. Including, but not limited to:

- Domestic manufacturing
- Import
- Processing as a reactant
- Processing in recycling
- Use as a laboratory chemical
- Use as a bonding agent for solvent welding

Dates

Final Rule: April 2024

Prohibitions for Consumer Use: May 5, 2025 (Distribution)

Prohibitions for Consumer Use: April 28, 2026 (Most commercial uses)

Commercial Furniture Refinishing: May 8, 2029 (Very specific furniture refinishing until date)

Recordkeeping and Downstream Notifications: October 7, 2024 (Manufacturers) and December 4, 2024 (Processors and distributors)

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Compliance Timelines*
Workplace Chemical Protection Program

Initial Monitoring
- Complete initial monitoring
- Demarcate regulated areas 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

Dates

Existing Buildings: Before May 5, 2025

New Buildings: Within 30 days of initiating use

Exposure Limits & Dermal Protections
- Ensure inhalation exposures do not exceed ECEL and STEL for all potentially exposed persons.
- Provide respiratory protection and/or dermal protection if applicable.

Dates

Existing Buildings: Before August 1, 2025

New Buildings: Within 90 days of initial exposure monitoring

* Longer timeframes for Federal agencies and contractors acting for on behalf of those agencies

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Compliance Timelines*
Workplace Chemical Protection Program

Exposure Control Plan
- Develop and implement an exposure control plan
- Notify potentially exposed persons of completion of plan within 30 days of completion
- Provide requested records by a potentially exposed person within 15 days of request

Dates
Existing Buildings: Before October 30, 2025
New Buildings: Update as necessary, but at least every 5 years

Other Monitoring
- 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 that may introduce additional sources of methylene chloride exposure or result in changes to exposure levels

* Longer timeframes for Federal agencies and contractors acting for on behalf of those agencies

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Periodic Monitoring Requirements

Air Concentration Condition	Periodic Monitoring Requirement
The initial exposure monitoring concentration is below the ECEL Action Level and at or below the EPA STEL.	ECEL and EPA STEL periodic monitoring at least once every 5 years.
The initial exposure monitoring concentration is below the ECEL Action Level and above the EPA STEL.	ECEL periodic monitoring at least once every 5 years AN EPA STEL periodic monitoring required every 3 months.
The initial exposure monitoring concentration is at or above the ECEL Action Level and at or below the ECEL; and or at below the EPA STEL.	ECEL monitoring every 6 months.
The initial monitoring concentration is at or above the ECEL Action Level and at or below the ECEL; and above the EPA STEL.	ECEL periodic monitoring every 6 months AND EPA STEL periodic monitoring every 3 months.
The initial exposure monitoring concentration is above the ECEL and below, at, or above the EPA STEL.	ECEL periodic monitoring every 3 months AND EPA STEL periodic monitoring every 3 months.

* Longer timeframes for Federal agencies and contractors acting for on behalf of those agencies

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Regulatory Impact of ECELs
Workplace Chemical Protection Program

- EPA-OSHA December 2024 Memorandum of Understanding (MOU)
- ECELs may be more stringent than OSHA PELs
- *(At this time)* OSHA is not enforcing EPA ECELs but
  - OSHA has agreed to participate in inspection and enforcement information sharing
    - Complaints, inspections, potential violations
  - **OSHA-Approved State Plans (ex: Oregon & Washington)** are encouraged to:
    - Refer applicable potential violations to EPA.
    - Participate in all information-sharing activities.
  - OSHA may request a Workplace Chemical Protection Program (WCPP)

Source: EPA website. https://www.epa.gov/system/files/documents/2025-01/epa-and-osha-tsca-section-6-mou.pdf

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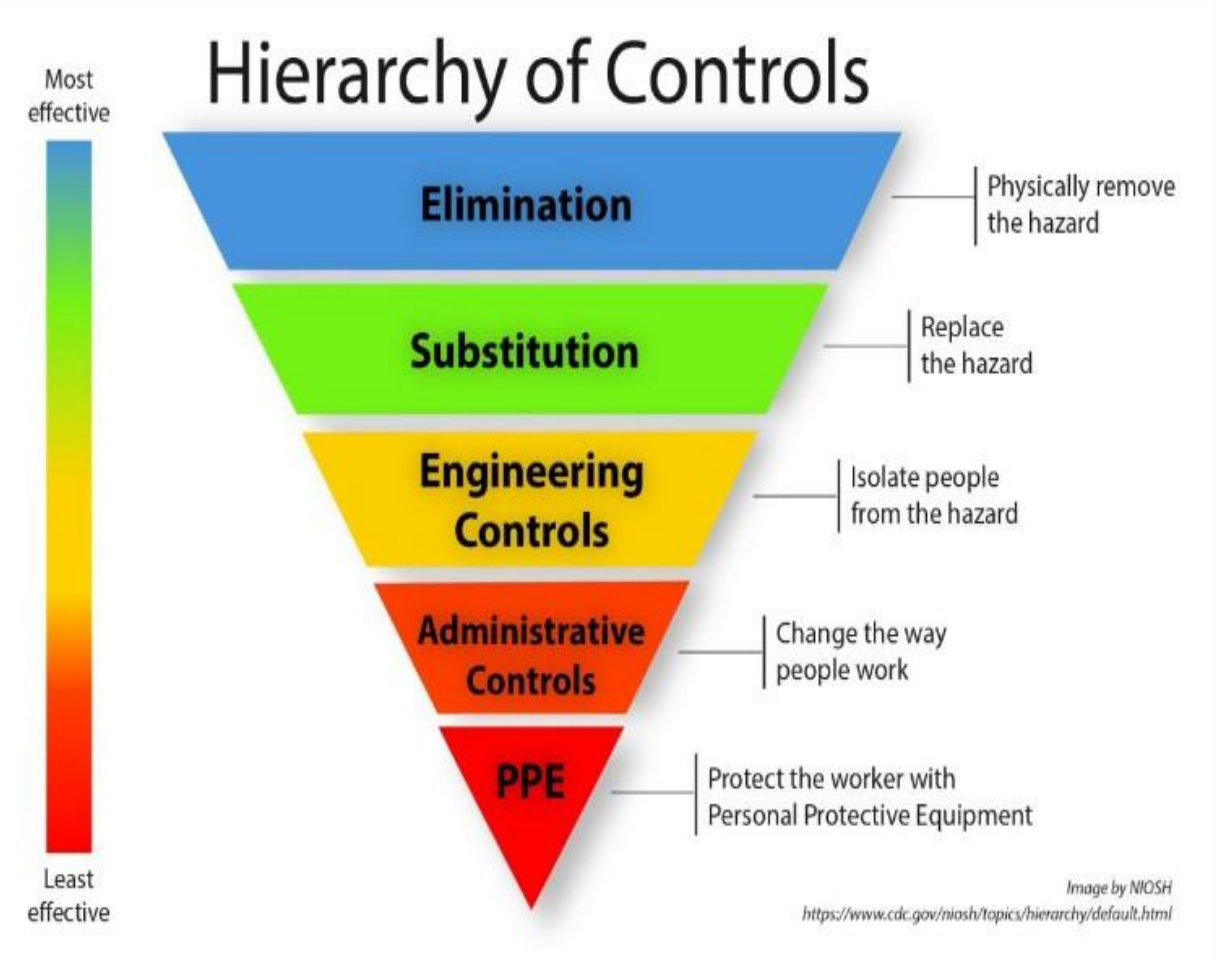
Workplace Chemical Protection Program
Exposure Control Plan

The methylene chloride rule requires owners and operators to develop an Exposure Control Plan to document actions taken to mitigate occupational exposure and comply with the WCPP.

The plan must describe efforts that will be taken to protect potentially exposed persons using the hierarchy of controls.

PRIOR to developing and implementing an Exposure Control Plan, employers *MUST* quantify personal methylene chloride exposures.



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Initial Monitoring

Why is it important to involve a CIH/IH when developing a methylene chloride sampling strategy?

- Assist with determining sampling objectives.
- Ascertain specific workplace characteristics.
- Determine **appropriate sampling methodologies** based on the above information.
- Identify similar exposure groups (SEGs).

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Initial Monitoring
Sampling Methodologies – Sampling Considerations

- Physical forms of contaminant
- **Potential analytical interferences**
- Estimated contaminant concentrations
- Analytical detection capabilities
  - LOD
  - SAE
  - Sample volume/time
- Sampling strategy approach:
  - Worst-case (compliance)
  - Random
  - Combination
- Sampling duration
  - Full-shift
  - Short-term
  - Task

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Initial Monitoring
Sampling Methodologies – Sampling Considerations

Resources:

- Accredited Industrial Hygiene Laboratories
- NIOSH Manual of Analytical Methods (NMAM)
- OSHA Occupational Chemical Database
- OSHA Technical Manual
- Other resources (ASTM, EPA, MSHA, ISO)

EPA does not endorse any specific air monitoring guidelines, ample guidance on sampling considerations is available from NIOSH NMAM 5th edition.

HOWEVER… OSHA Method 1025 is identified in the EPA Methylene Chloride Regulation Under TSCA.

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Initial Monitoring
Sampling Methodologies – Sampling Considerations

- OSHA Method 1025 or comparable method
- Talk to your laboratory!
  - Analytical capabilities
  - Alternate sampling methods
  - Volume
  - Time
  - Sampling media
  - Field blanks – same lot as sampling media

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OSHA
1910.1052 Methylene Chloride

Exposure Limits

- PEL: 25 ppm TWA
- Action Level: 12.5 ppm TWA
- STEL: 125 ppm (15 minutes)

Periodic Monitoring

Initial monitoring needed to determine if personal exposures exceed the Action Level, PEL or STEL. Periodic monitoring every 3-6 months depending on if personal exposures exceed regulatory thresholds.

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OSHA
1910.1052 Methylene Chloride

Action Level Trigger Requirements

- Biannual periodic monitoring (same is true for results exceeding the STEL).
- Medical surveillance for employees above the Action Level on 30 or more days per year.
- Employee training regarding the quantity, location, manner of use, release, storage of methylene chloride, and operations that can result in exposures above regulatory thresholds. *NOTE: Hazard Communication and standard-specific training is required for all employees potentially exposed to methylene chloride.*
- Recordkeeping

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OSHA
1910.1052 Methylene Chloride

PEL & STEL Trigger Requirements

- Quarterly periodic monitoring (PEL only).
- Employee notification of monitoring results.
- Medical surveillance for employees above the PEL or STEL on 10 or more days per year.
- Implementation of regulated areas.
- Respiratory protection.
- Installation of engineering control methods to reduce exposures below the PEL.
- Same training and recordkeeping requirements for results above the Action Level.

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Hazard Recognition

Final Existing Chemical Exposure Limits (ECELs)

Chemical Name	CAS #	ECEL[a]	EPA STEL[b]	Notes	Date Promulgated	Relevant Regulation
Asbestos (Chrysotile)	132207-32-0	0.005 fibers/cubic centimeter[c]	N/A	Learn about conditions of use of asbestos with an interim inhalation exposure limit prior to the effective date of prohibition.	2024	Link to final rule.
Carbon Tetrachloride (CTC)	56-23-5	• 0.2 mg/m^3 • 0.03 ppm	N/A	Learn about conditions of use of CTC continuing under the WCPP.	2024	Link to final rule.
Methylene Chloride	75–09–2	• 8 mg/m^3 • 2 ppm	16 ppm	Learn about conditions of use of methylene chloride continuing under the WCPP.	2024	Link to final rule.
Perchloroethylene (PCE)	127-18-4	• 0.98 mg/m^3 • 0.14 ppm	N/A	Learn about conditions of use of PCE with inhalation exposure limits under the WCPP.	2024	Link to final rule.
Trichloroethylene (TCE)	79-01-6	• 1.07 mg/m^3 • 0.2 ppm[c]	N/A	Learn about conditions of use of TCE with an interim inhalation exposure limit prior to the effective date of prohibition.	2024	Link to final rule.

Know your synonyms

Methylene Chloride: Dichloromethane, DCM, Methylene dichloride, Methylene bichloride, Methane dichloride, Methylenum chloratume, Freon 30.

Check CAS #: 75-09-2

Understand chemical uses and common industries.

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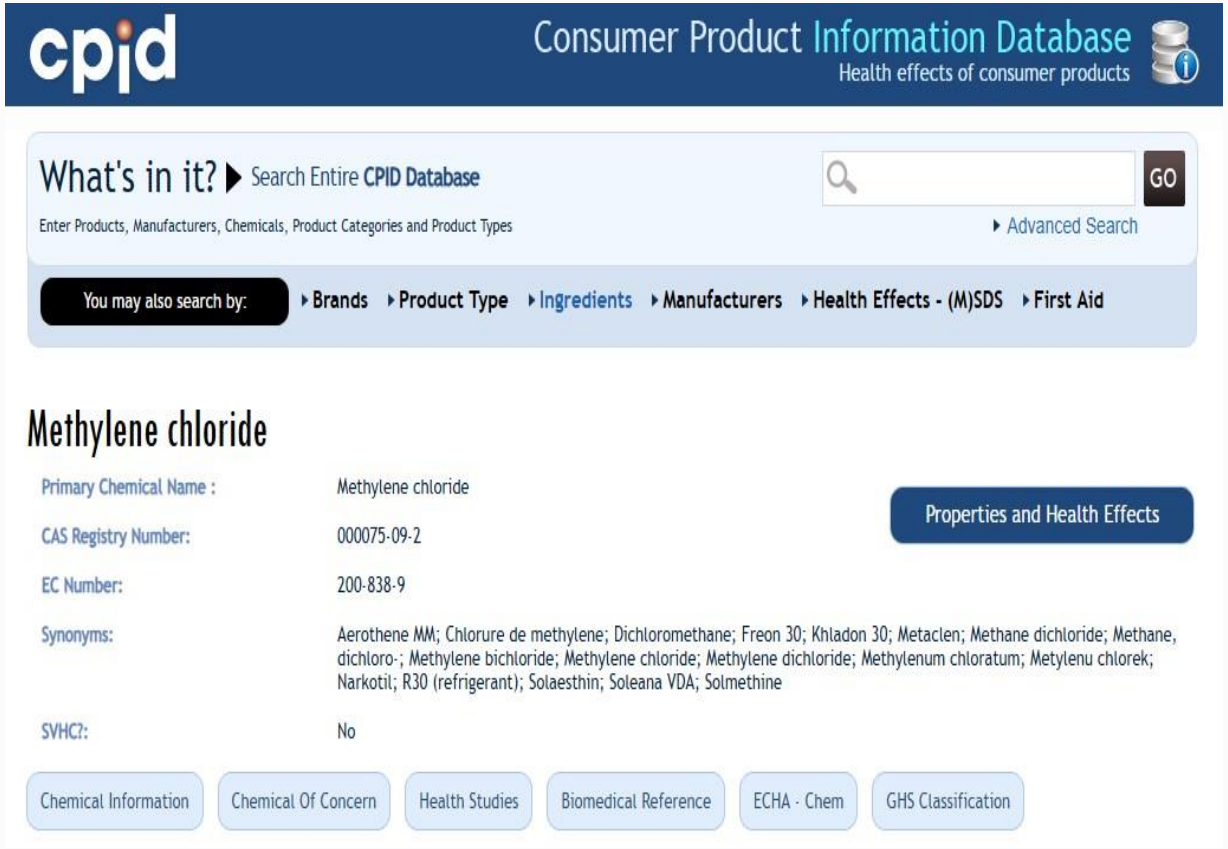
Hazard Recognition

Consumer Product Information Database

- Chemical information
- Health studies
- Biomedical reference
- GHS Classification
- **Brands/Products containing chemical of interest**
- GHS classification

Lists products containing the searched chemical.



CPID Database: Health Effects of Consumer Products

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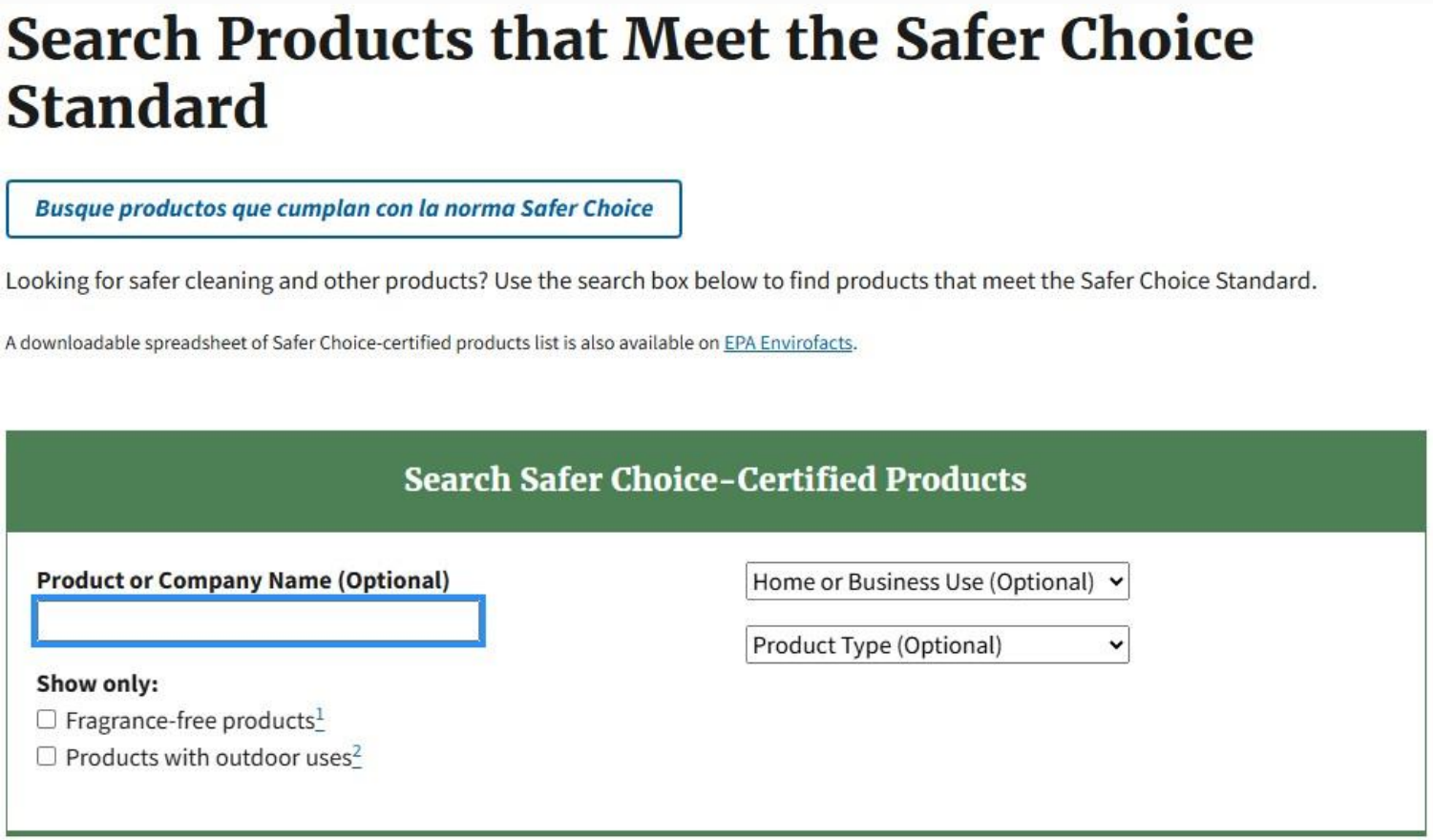
Risk-Based Decision Making

EPA site lists safer cleaning products:



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Risk-Based Decision Making

Safer products available on Amazon… As of May 7, 2025!

SAFETY DATA SHEET Page: 2 of 10

Klean-Strip Aircraft Paint Remover

Revision: 05/01/2019
Supersedes Revision: 12/04/2018

	IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. IF exposed: Call a POISON CENTER or doctor/physician. IF exposed or concerned: Get medical attention/advice. Immediately call a POISON CENTER or doctor/physician. Get medical attention/advice if you feel unwell. Specific treatment see label. Rinse mouth. If eye irritation persists, get medical advice/attention. Wash contaminated clothing before reuse.
GHS Storage and Disposal Phrases:	Store locked up. Dispose of contents/container according to local, state and federal regulations.
Potential Health Effects (Acute and Chronic):	Listed above.

3. COMPOSITION/INFORMATION ON INGREDIENTS

CAS #	Hazardous Components (Chemical Name)	Concentration
75-09-2	Dichloromethane {Methylene chloride; R-30; Freon 30}	60.0 -80.0 %
67-56-1	Methanol {Methyl alcohol; Carbinol; Wood alcohol}	5.0 -10.0 %
1336-21-6	Ammonium hydroxide {Ammonia aqua; Ammonium liquor}	1.0 -5.0 %
1330-20-7	Xylene (mixed isomers) {Benzene, dimethyl-}	1.0 -5.0 %
8052-41-3	Stoddard solvent {Mineral spirits; Aliphatic Petroleum Distillates; White spirits}	1.0 -5.0 %
100-41-4	Ethylbenzene {Ethylbenzol; Phenylethane}	0.1 -1.0 %
108-88-3	Toluene {Benzene, Methyl-; Toluol}	0.1 -1.0 %

Additional Chemical information Specific percentage of composition is being withheld as a trade secret.

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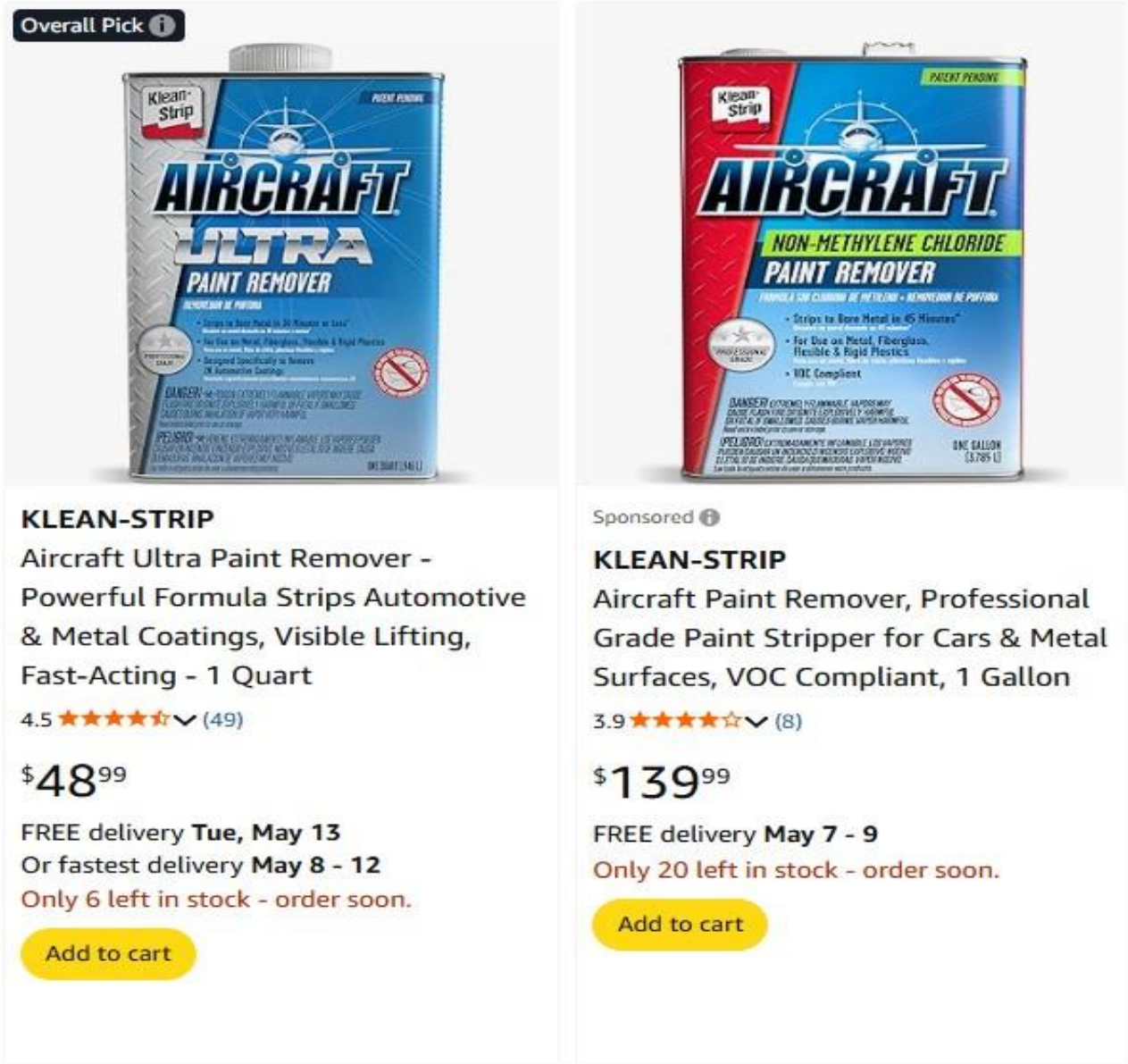
Risk-Based Decision Making

Safer products available on Amazon…

As of May 7, 2025!



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SECTION 3: Composition/Information on ingredients

3.1. Substances

Not applicable

3.2. Mixtures

Name	Product identifier	%	GHS-US classification
acetone	(CAS-No.) 67-64-1	25 - 45	Flam. Liq. 2, H225 Eye Irrit. 2, H319 STOT SE 3, H336 Aquatic Acute 3, H402
1,3-dioxolane	(CAS-No.) 646-06-0	25 - 45	Flam. Liq. 2, H225
dimethylcarbonate	(CAS-No.) 616-38-6	10 - 25	Flam. Liq. 2, H225
methanol	(CAS-No.) 67-56-1	< 10	Flam. Liq. 2, H225 Acute Tox. 4 (Oral), H302 Acute Tox. 3 (Inhalation), H331 Acute Tox. 3 (Inhalation:vapour), H331 STOT SE 1, H370
distillates, hydrotreated light	(CAS-No.) 64742-47-8	< 10	Asp. Tox. 1, H304

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Thank you

Matt Harper, CIH, CSP
Principal Consultant
May 2025