COLUMBIA-WILLAMETTE CHAPTER

May 2025 Membership Meeting

Joint meeting with Pacific Northwest Section (PNS) of American Industrial Hygiene Association (AIHA)

Welcome ASSP members, AIHA members, and guests!

Thank you ASSP CWC for this joint meeting!

Pacific Northwest Section (PNS) of the American Industrial Hygiene Association (AIHA)

Get to know us

Public Linkedin Page:

- **Includes Cascade Impactor Newsletter**
  - **Upcoming events**
  - **Trends in IH**
  - **New research**

Upcoming opportunity:

PNS AIHA Northwest Occupational Health Conference (NOHC) 2025

October 6-8, 2025

Bremerton, WA - Admiral Theatre

Information on registration will be on our Linkedin page!

Help us plan for NOHC 2025 & prepare for NOHC 2026 by taking a short survey:

COLUMBIA-WILLAMETTE
CHAPTER

ASSP Columbia Willamette Chapter Announcements

Open call for chapter volunteers!

2025-2026 term

Open positions

- Membership committee
- Media chair (recording meetings)
- Awards and Recognition
- Continuing Education/Certification Prep

Please contact Nichole Guilfoy at nichole.Guilfoy@providence.org

Surveys

Annual ASSP CWC member survey

- Going out in June
- Gift card drawing for completing survey
- **We want to hear your input on meeting topics, launching a new mentorship program, and mental health!**

Request: CWC member doctoral interview research

- Who: Construction workers willing to share experiences with reporting near misses
- One x 60 min virtual, phone, in person interview
- Please contact Joaquin.diaz@waldenu.edu

Member recognition

- **Brian Clarke & Kim Gamble** – Published article in ASSP Professional Safety Journal (PSJ)

BEST PRACTICES

SAFETY PROFESSIONALS' ROLE IN CONTRACTOR QUALITY PROGRAMS

By Brian Clarke and Kimberly Gamble

The increasing costs of construction defect claims including the cost of rework are driving the industry to improve its quality. This article discusses the overlap and parallels between construction safety and quality control programs, referencing research that connects the relationship between worker injuries and rework.

Rework is often considered an error, a mistake or a cost to be hidden, and therefore may not be properly planned (Photo 1). Experienced construction safety professionals would likely agree that projects with poor housekeeping are often behind schedule and over budget, have higher incident and injury rates, and are plagued by callbacks to perform "warranty work." More experienced con-

safety incidents in construction projects. Wanberg et al. (2013) found a positive linear relationship between the recordable injury rates per 200,000 workers and the number of worker hours related to rework per $1 million scope of project completed.

Contractor Selection

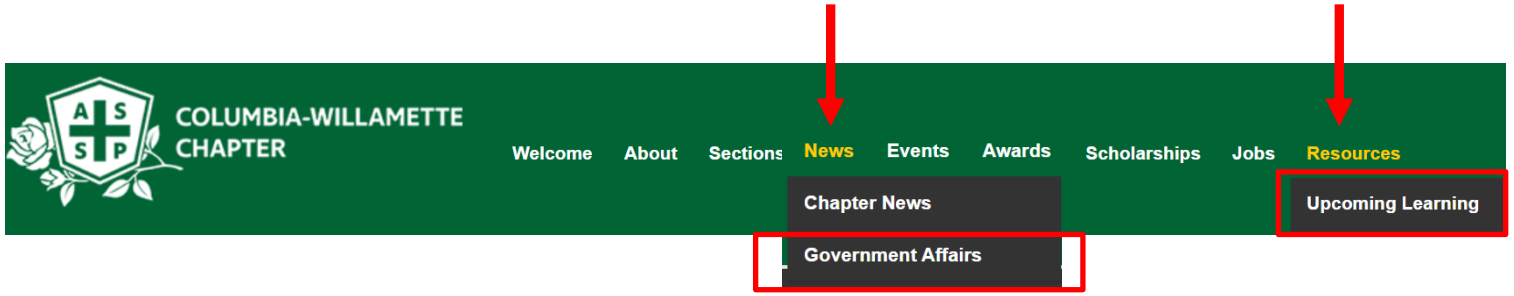
The construction industry historically has measured contractor safety excellence

- **Todd Hudson** – Safety Professional of the Year (SPY) for ASSP Training & Communications Practice Specialty

O[yes] Media Contest 1st Place Winners

[View the winners and finalists at youngemployeesafety.org]

Member resources on our website!



https://cwc.assp.org/

Government Affairs

Government Affairs & Advocacy Update:

Sign up to receive email updates from ASSP on government affairs and advocacy related to occupational safety & health: LP – 2023 GA Update Subscription Form

February 2025

Through the activities and engagement of the Government Affairs Committee, ASSP supports its commitment to advocating for evidence-based policy decisions and engages with policymakers to ensure our members' voices are part of important deliberations. ASSP also supports efforts by federal agencies to advance workplace safety and health through public awareness campaigns.

TOP STORIES

Bill Introduced to Abolish OSHA Representative Andy Biggs (R-AZ) has introduced the NOSHA Act (H.R. 86), aiming to eliminate OSHA. Similar legislation has been proposed in the past. While the bill is unlikely to gain traction, ASSP is monitoring developments and will share updates as needed. Track the bill

ASSP Offers Key Insights on OSHA's Proposed Heat Injury & Illness Prevention Standard
Informed by member input, ASSP submitted technical comments on OSHA's proposed heat standard. Overall, ASSP supports a federal rule on preventing heat injury and illness but recommends revising the proposal to better align with ANSI/ASSP A10.50-2024. Read more

Common Interest Groups

Hispanic Safety Professionals

Navigating Ethical Challenges in Safety & Health

Complimentary Education | Monday, April 28 | 3 p.m. CT | 0.1 CEUs

Explore the complex ethical dilemmas that EHS professionals encounter in their daily practice. Learn how to identify, analyze and resolve ethical conflicts while maintaining professional integrity and ensuring optimal workplace safety outcomes. Register today

Emerging Professionals in OSH

Networking: What's Your Reason?

Complimentary Education | Wednesday, March 26 | Noon CT Networking can play an important role in personal and professional growth. Discuss tips, tricks and techniques for successful networking. Register today

Practice Specialty Communities

Safety Think-Along: Deliver Targeted Training Using Data Insights

Complimentary Education | Tuesday, April 8 | 11 a.m. CT

Get ready to roll up your sleeves and think through safety data like never before! This isn't a talking heads webinar — it's a hands-on, collaborative journey into using data to make safety training more impactful. Register today

Improving Safe Patient Handling & Mobility in Long-term Care

Complimentary Education | Thursday, April 10 | 11 a.m. CT | 0.1 CEUs

Certified ergonomics consultant, Andrea McKinney, will discuss key mobility challenges in long-term care, as well as the benefits of a safe patient handling program for residents including facts versus fiction, types of transfers, technology, and new and emerging solutions. Register today

Fire Protection Practice Specialty

PFAS Substances & EHS Professionals: Forecasting the Future of Forever Chemicals

Complimentary Education | Friday, April 11 | 2 p.m. CT

Learn about PFAS exposure in the workplace, emerging workplace regulations and strategies to minimize risks. Register today

COLUMBIA-WILLAMETTE
CHAPTER

Upcoming Events

2025 Officer Installation and Awards Ceremony

June 6th, 5:30 pm – 9:30 pm at Top Golf, Hillsboro

FREE for members; $50 for guests

Registration open until May 29!

Upcoming Section Meetings

- **ASSP Mt St Helens Section (Kelso)**
  - May 15th @ 7:30am – Heat mapping & Health standards
  - June 20th @ 6pm – Officer Installation Banquet

- **ASSP Santiam Section (Salem)**
  - May 14th @ 12:00pm – Heat illness prevention and Wildfire Smoke

May safety awareness

- Safety Break for Oregon – May 14th

- Mental Health Awareness Month
  - NAMI Oregon
  - American Foundation for Suicide Prevention
  - Resources from Dr. Sally Spencer Thomas
    - Guidebook on training programs
    - 10 mistakes to avoid developing mental health program

MAY 14, 2025

Contact updates@cwc.assp.org if interested in being on the planning committee

- **Planning starts:** May 30th
- **Meeting frequency:** Every 2 weeks, Fridays, 7-8am
- **Who:** union, contractors, government, associations, mental health providers

Upcoming Conferences

- **Northwest Safety & Health Summit by Region X VPPPA**
  - Portland - May 13-15
- **Pacific Northwest Safety Symposium (Puget Sound ASSP chapter)**
  - Auburn, WA - May 22
- **Blue Mountain Conference**
  - Pendleton - June 2-3
- **ASSP Safety 2025 Conference + Expo**
  - Orlando, FL - July 22-24
- **Santiam Section 2025 PDC – Fall Protection**
  - Salem - September 16
- **Central Oregon – September**
- **Southern Oregon – October**
- **Western Pulp & Paper – December**

More info: https://osha.oregon.gov/conferences/Pages/index.aspx

Santiam section fall PDC

What safety professionals should know about fall protection in 2025

Instructed by: Dustin Schneider, CHST, QSSP

- September 16, 2025
- 8am-3pm
- Broadway Commons, Salem
- $150 ASSP member ($195 non-member)
- CEUs, lunch refreshments

Registration required: https://cwc.assp.org/events/santiamfallpdc/

Upcoming CWC events:

Officer Installation Event

June 6th @ TopGolf

Resume monthly meetings

September 11th @ Brix

Oregon OSHA Updates

Renee Stapleton, OR OSHA Administrator

Please take our meeting survey!

CEU forms available at the registration table!

Today's presentation

PNS-AIHA Joint Meeting

Methylene Chloride Risk Management

Mr. Matt Harper, CIH, CSP

Principal Consultant, BSI Group

Join ASSP CWC and PNS-AIHA as we review essential strategies for complying with the new EPA TSCA rule and existing Oregon OSHA standards for methylene chloride covering monitoring, exposure controls, and administrative requirements.

Methylene Chloride: Regulatory Compliance & Risk Management

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

Matt Harper, CIH, CSP
Principal Consultant
May 2025

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

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

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.

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.

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

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

Chemical Risk Evaluations Under TSCA

38

Existing chemicals have either undergone or are currently undergoing risk evaluation

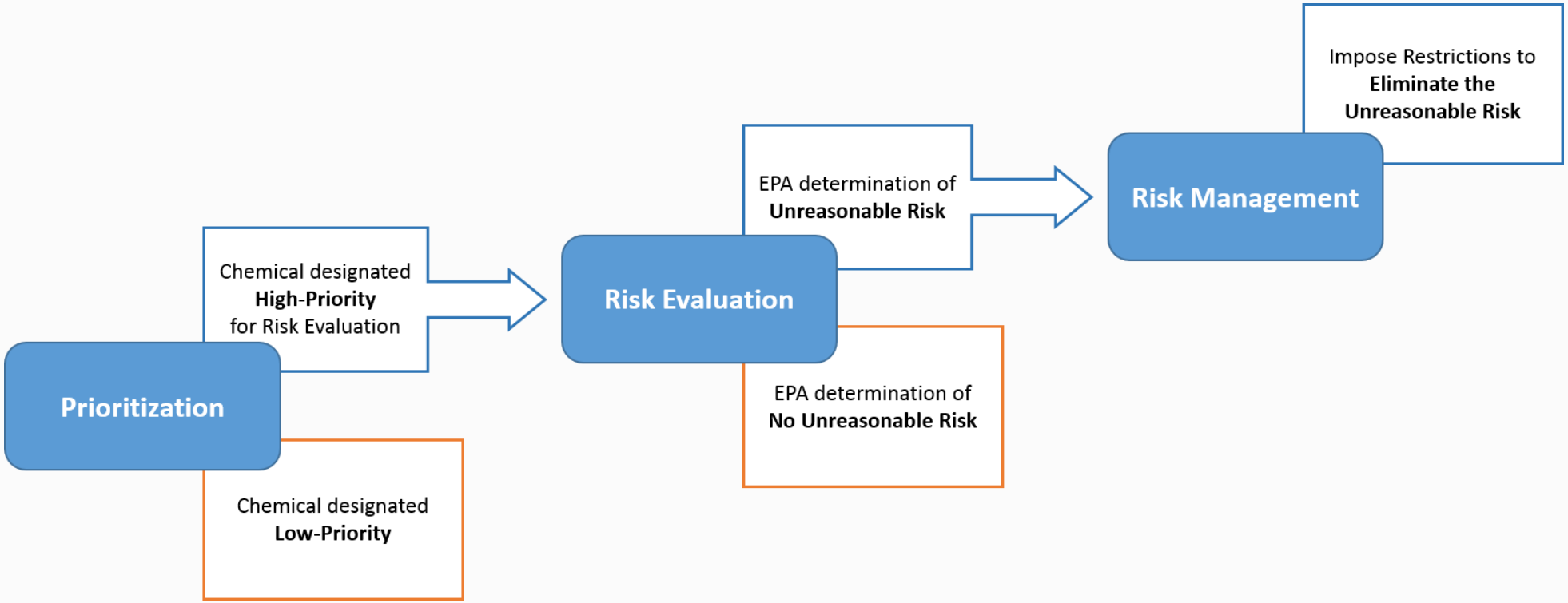
445

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

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

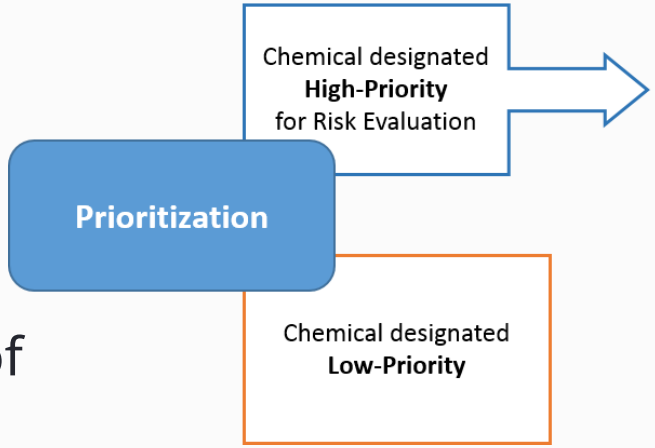


Source: EPA Website. Summary of the Toxic Substances Control Act. https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act
Graphic: How EPA Evaluates the Safety of Existing Chemicals, https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/how-epa-evaluates-safety-existing-chemicals

EPA Prioritization

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

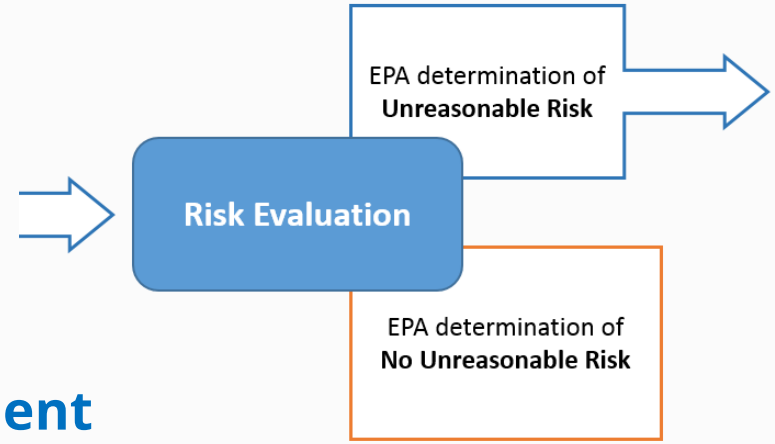
- Persistence and bioaccumulation
- Potentially Exposed Susceptible Subpopulations (PESSs)
- Storage near significant sources of drinking water.
- Conditions of Uses (COU) or significant changes in the COUs
- Production volume or significant changes in production volume of the chemical substance manufactured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



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

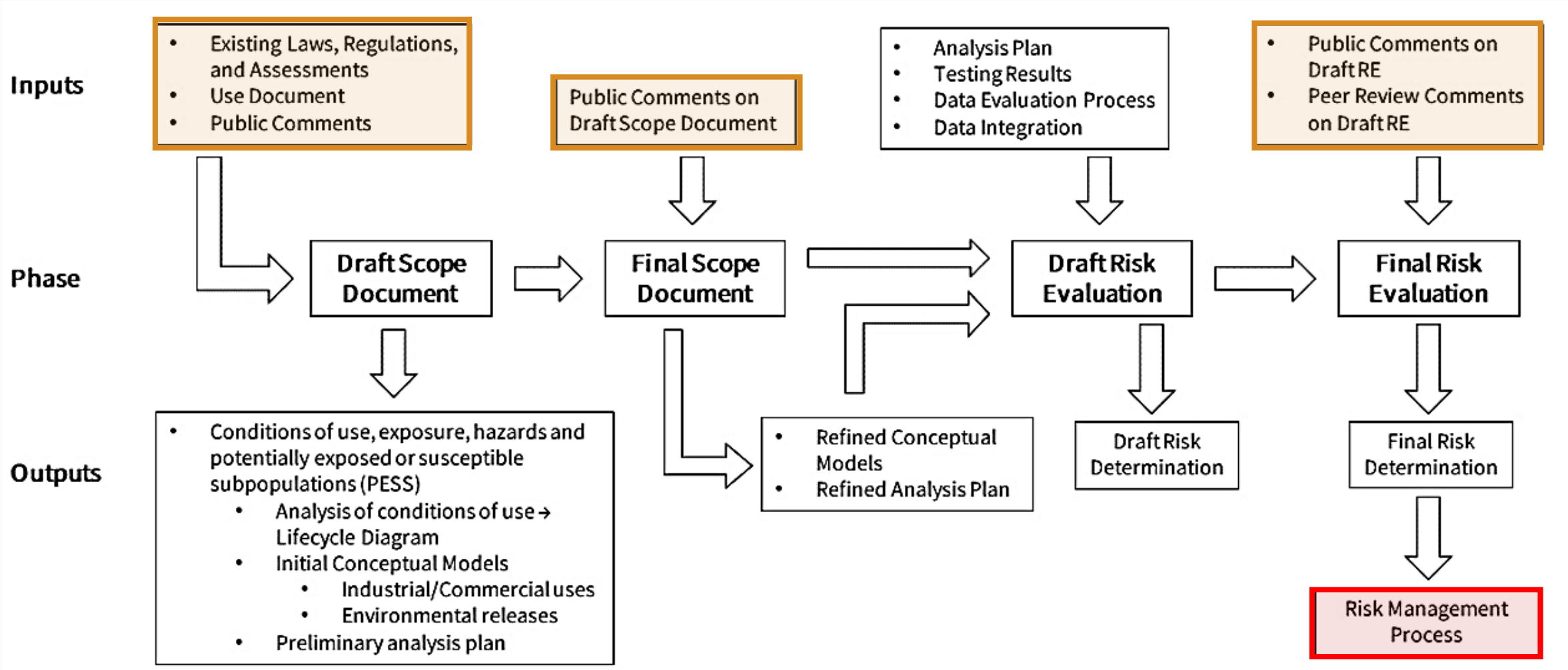
EPA Risk Evaluations

- 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.



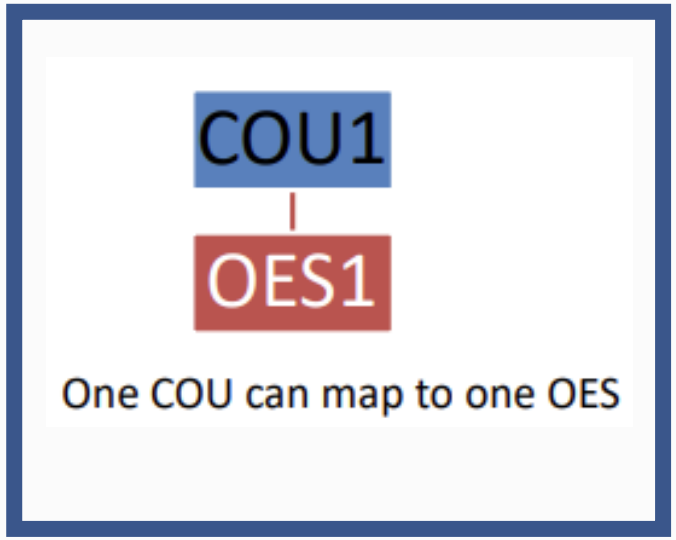
Source: EPA Website. Prioritization Actions Under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/prioritization-actions-under-tsca

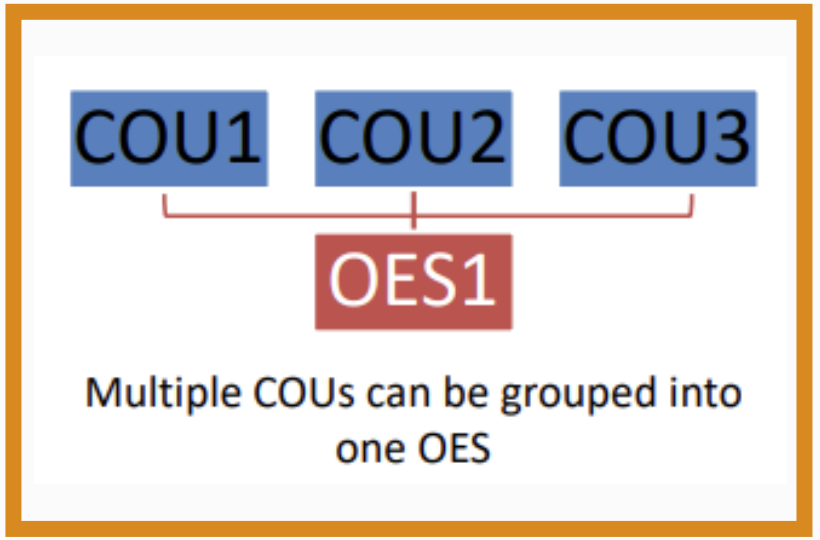
EPA Risk Evaluations
High priority existing chemicals

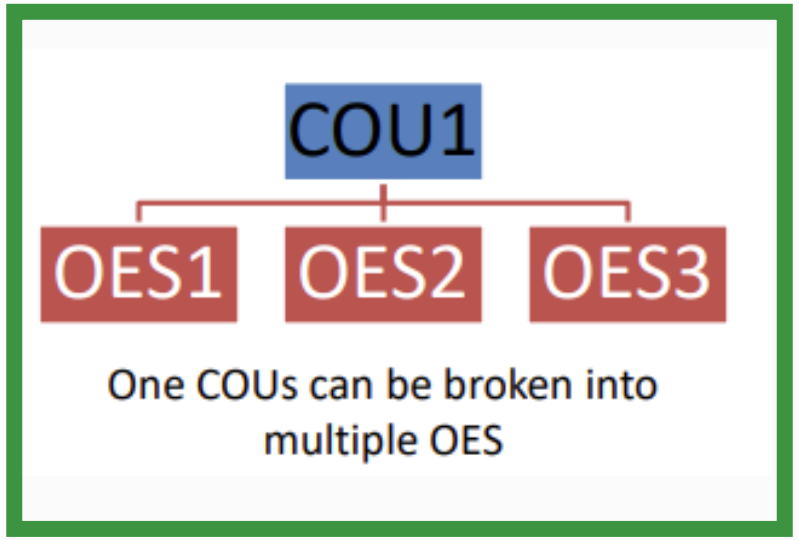


Source: EPA Website. Risk Evaluations for Existing Chemicals under TSCA. https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-evaluations-existing-chemicals-under-tsca#determination

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





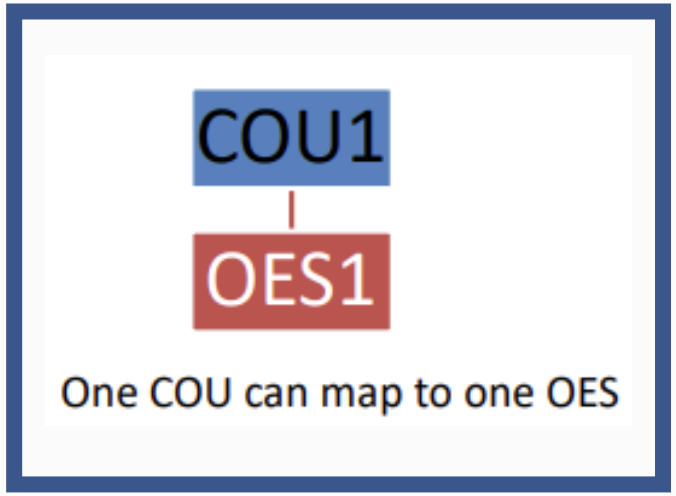


Source: EPA Document. Development of OESS. https://www.epa.gov/system/files/documents/2023-12/development-of-oess2.pdf
ACGIH On-Demand Webinars, 2024. TSCA Webinar Series. https://www.acgih.org/professional-development/professional-development/webinars/

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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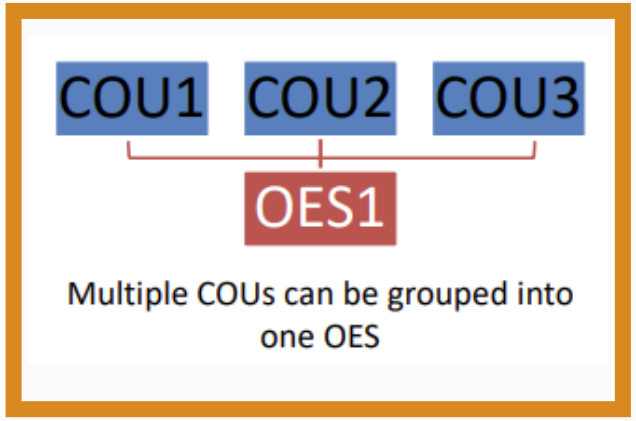
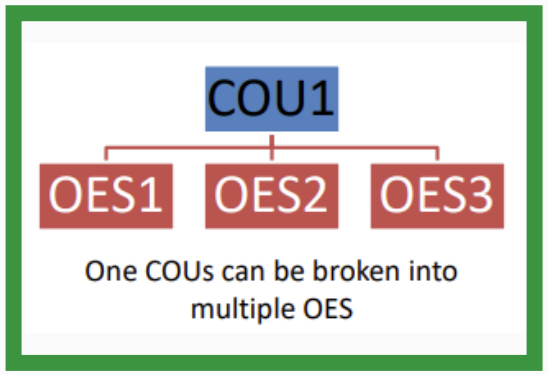


Table 2-22. Crosswalk of Conditions of Use to Occupational and Consumer Scenarios Assessed in the Risk Evaluation

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		

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

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

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

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)

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)

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

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

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

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)

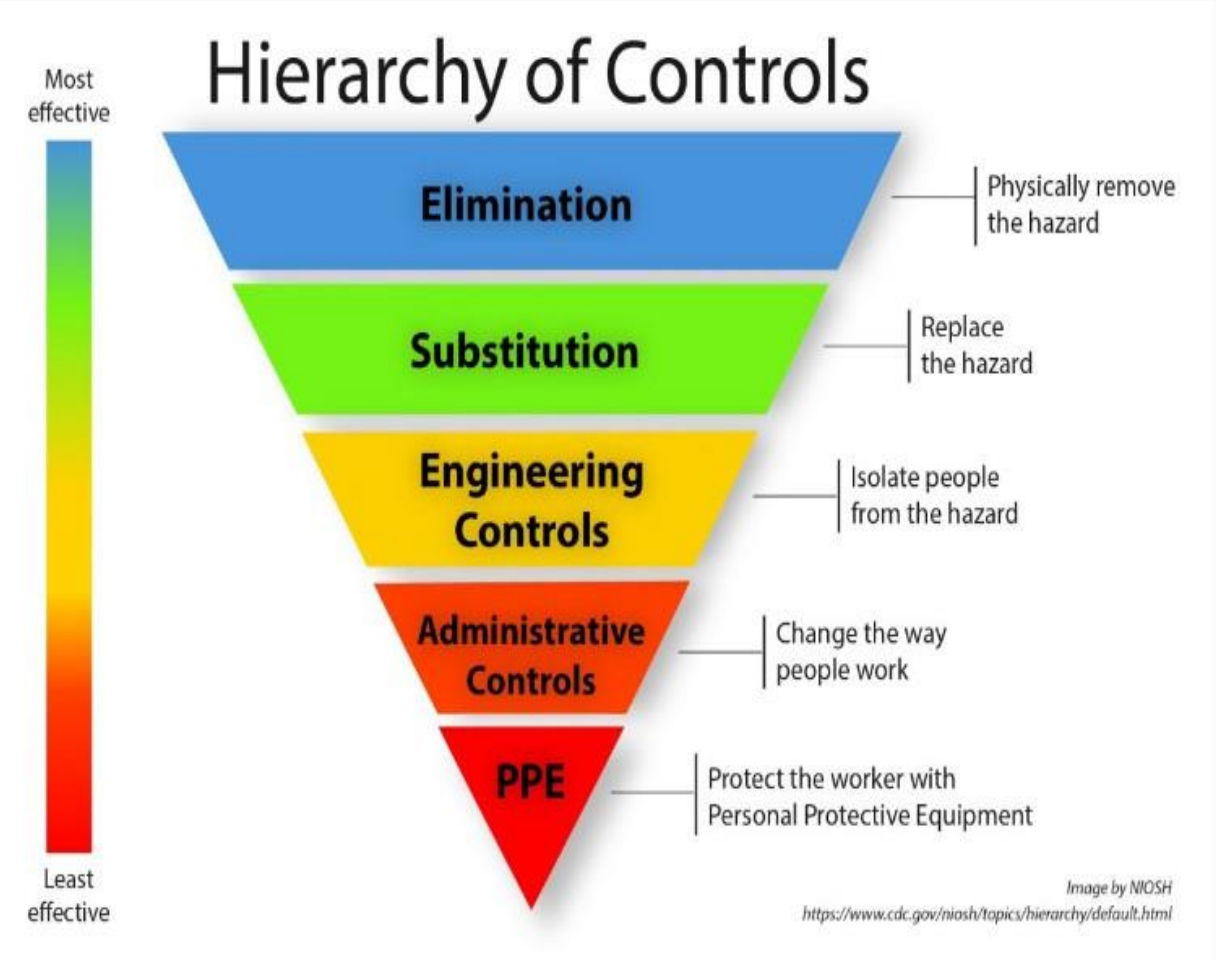
Source: EPA website. https://www.epa.gov/system/files/documents/2025-01/epa-and-osha-tsca-section-6-mou.pdf

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.



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).

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

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.

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

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.

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

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.

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

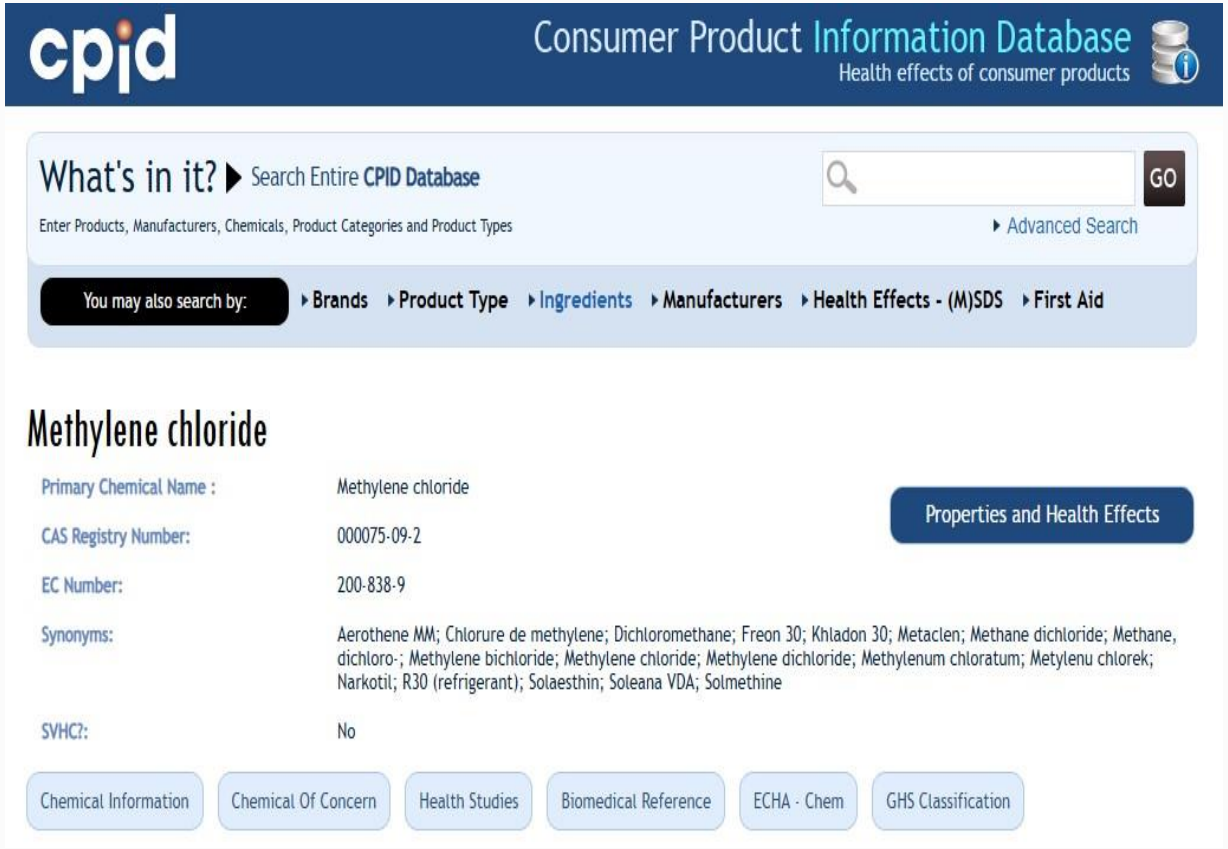
Understand chemical uses and common industries.

Hazard Recognition

Consumer Product Information Database

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

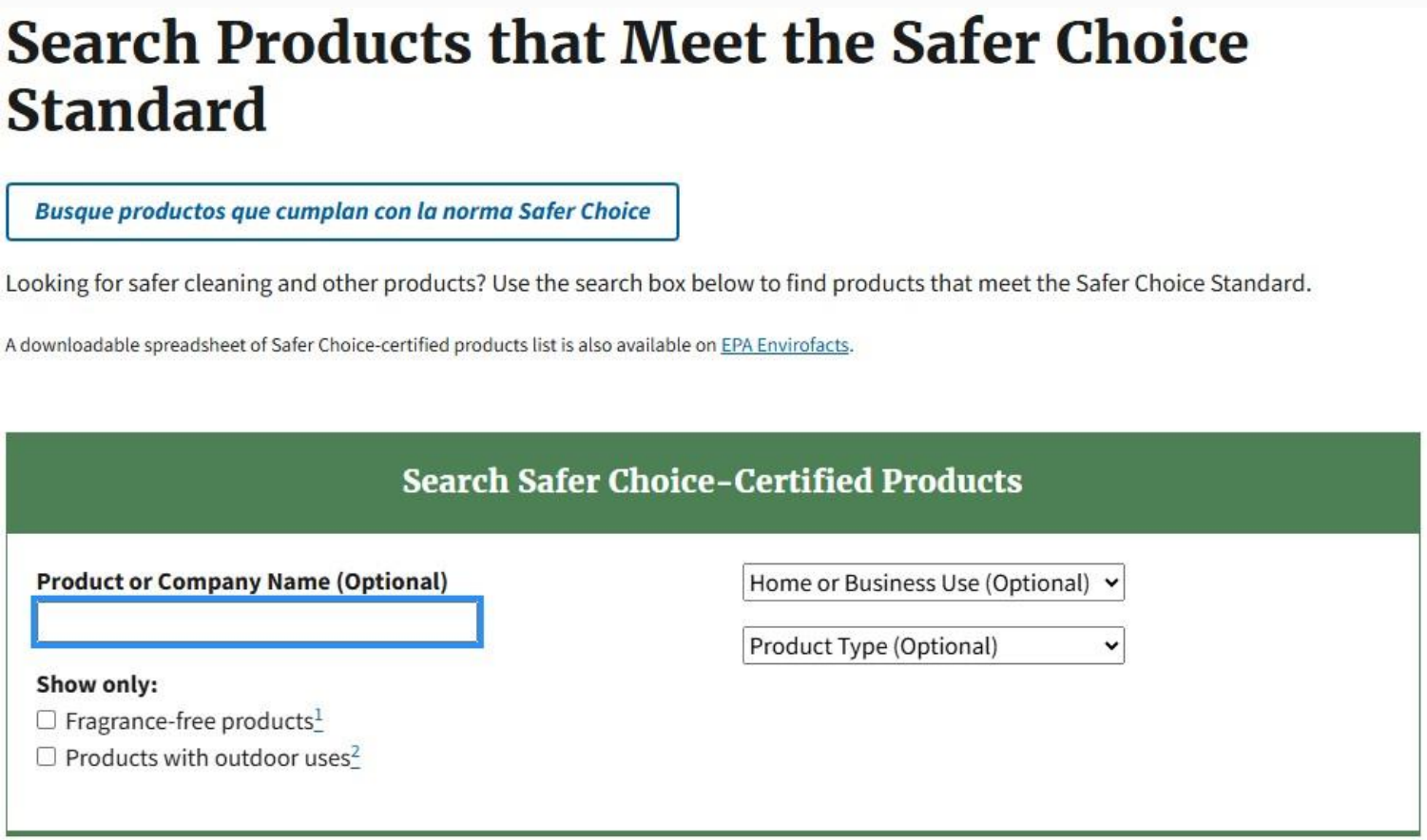
Lists products containing the searched chemical.



[CPID Database: Health Effects of Consumer Products]

Risk-Based Decision Making

EPA site lists safer cleaning products:



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

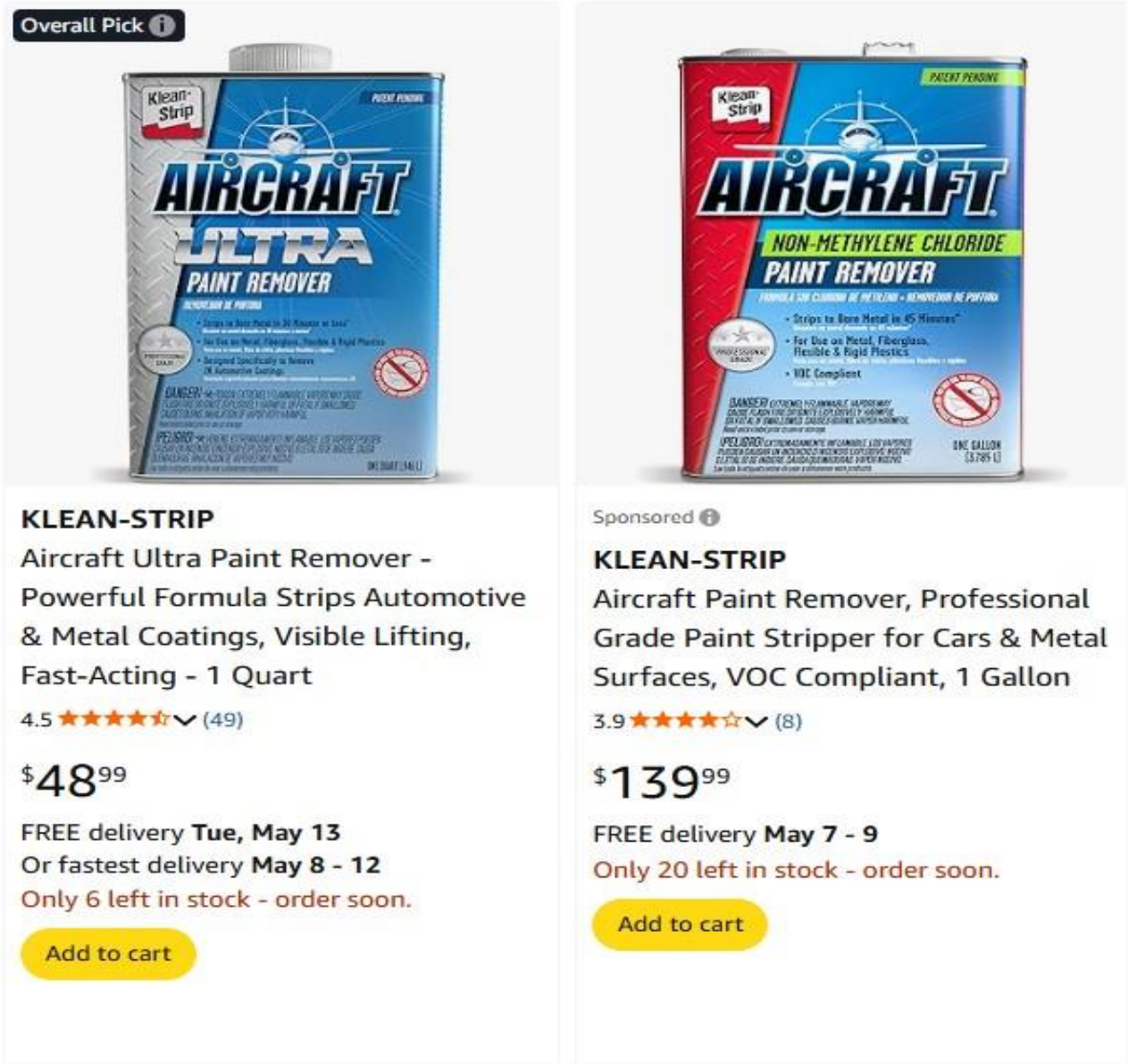
CAS #	Hazardous Components (Chemical Name)	Concentration
75-09-2	Dichloromethane {Methylene chloride; R-30; Freon 30}	60.0 -80.0 %
67-56-1	Methanol {Methyl alcohol; Carbinol; Wood alcohol}	5.0 -10.0 %
1336-21-6	Ammonium hydroxide {Ammonia aqua; Ammonium liquor}	1.0 -5.0 %
1330-20-7	Xylene (mixed isomers) {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.

Risk-Based Decision Making

Safer products available on Amazon…

As of May 7, 2025!



Risk-Based Decision Making

Safer products available on Amazon…?

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

Thank you

Matt Harper, CIH, CSP
Principal Consultant
May 2025