

- Identify Applicability
  - ☐ Confirm if your organization manufactures, processes, distributes, uses, or disposes of methylene chloride or related products.
- Workplace Chemical Protection Program (WCPP)
  - □ Develop a WCPP for continued use of methylene chloride under regulated conditions.
  - ☐ Ensure compliance with the exposure limit of 2 ppm (8-hour TWA) and 16 ppm (15-min TWA).
  - Initial Monitoring and Exposure Control
- □ Conduct initial exposure monitoring.
  - □ Establish regulated areas within 3 months of initial monitoring data.
  - □ Provide respiratory and dermal protection within specified timelines.
- Exposure Control Plan
  - □ Develop and implement an exposure control plan by the required deadlines.
  - □ Notify affected workers within 30 days of plan completion.
- Periodic and As-Needed Monitoring
  - □ Schedule periodic monitoring every 5 years or as frequent as every 3 months.
  - □ Conduct additional monitoring after any changes in exposure conditions.
  - Prohibition Compliance
    - □ Prohibit distribution for consumer use by May 5, 2025.
      - □ Cease most commercial uses by April 28, 2026.
      - □ Ensure specific furniture refinishing uses comply until May 8, 2029.
- Safety Data Sheets (SDS)
  - □ Update SDS by October 7, 2024 (manufacturers) or December 4, 2024 (processors/distributors).
  - □ Notify downstream users with updated SDS.
- Recordkeeping
  - ☐ Maintain records of monitoring, exposure plans, and worker notifications.
  - □ Respond to worker record requests within 15 days.

This checklist ensures alignment with the TSCA rule requirements and supports compliance efforts.

Request more information:

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