



# WisCon Words of Wisdom

Volume 4 | Issue 12 | December 2, 2024

## WisCon Welcomes A New Program Administrator

After the retirement of WisCon's Program Administrator (PA), Natalie Jամandre a couple of years ago, our PA position has been filled with consultants rotating into the role until now. Christina Strebel joined us last month as WisCon's PA.

Christina, like many of you, is a small business owner. She turned her passion for vintage décor into an online business. She also has a background in the dental industry and customer service. As a Wisconsin native, she enjoys cheering on the Packers and frequenting local supper clubs and coffee shops.

Christina will be the person you first interact with when requesting WisCon services via phone or email.

## Upcoming Webinars

December 17th: [Walking/Working Surfaces—Slips, Trips, and Falls](#)

February 25th: Workplace Health and Safety for the EHS Work

(Registration Link will be included in the next issue.)

## We want to hear from you!

What content would you like to see in an upcoming newsletter?

Let us know [here](#).

## New OSHA Alliance With The Wisconsin Cheesemakers Association

WisCon, OSHA (Occupational Safety and Health Administration) and the WCMA (Wisconsin Cheesemakers Association) signed an alliance on October 17, 2024.

An alliance is a formal, collaborative partnership between OSHA and state consultation programs to provide an organization with workplace safety and health support. [OSHA Alliance Program | Occupational Safety and Health Administration](#)

The WCMA alliance is aimed at improving worker safety and health for WCMA companies. The WCMA is comprised of approximately 650 Wisconsin dairy processing companies.

WisCon and OSHA Enforcement will be providing the WCMA with information and training on OSHA standards and OSHA initiatives. Our organizations will also be developing resources for the dairy processing industry.

Appleton OSHA Area Office Director Robert Bonack commented, "Our programs will focus on protecting workers from known industry hazards associated with machinery, occupational noise, heat illness and electrical safe work practices to ensure every employee safely completes their shift each day."

WisCon has been providing the WCMA for support for many years. This alliance is a formalization of the cooperative relationship already forged.



# Key Provisions of the EPA's Methylene Chloride Rule (40 CFR Part 751 Subpart B - Methylene Chloride)

Methylene chloride (MC), also called dichloromethane, is a colorless liquid with a sweet odor that causes both long-term and immediate adverse health effects. Exposure to MC can be through both inhalation and skin adsorption. Having determined that MC presents an unreasonable human health risk, in May of this year the U.S. Environmental Protection Agency (EPA) published a new regulation for methylene chloride. This new regulation went into effect on July 8, 2024. Longer compliance time frames were granted to federal agencies and contractors working for or on behalf of those agencies.

Distribution of MC for consumer use will be prohibited after May 5, 2025. With the exception of 13 specific commercial and industrial uses, the use of MC will be prohibited after April 28, 2026. For the 13 instances where MC use will be allowed, employers will need to comply with the requirements of the Workplace Chemical Protection Program (WCPP) found in [40 CFR 751.109](#).

Requirements of the WCPP which must be in place by October 30, 2025, include workplace air monitoring, providing personal protective equipment (PPE), a written exposure control plan, training, recordkeeping and employee notifications. Depending on workplace exposure levels, respiratory protection may be required and/or the establishment of regulated areas.

EPA exposure limits are significantly lower than those contained in OSHA's Methylene Chloride Standard. ([29 CFR 1910.1052](#)). The EPA has established an 8-hour Time Weighted Average (TWA) exposure limit of 2 parts per million (ppm), an action level of 1 ppm and a 15-minute short-term exposure limit of 16 ppm.

Initial air monitoring must be conducted by May 5, 2025. The results of the initial monitoring determine the frequency of subsequent monitoring, ranging from every 3 months for certain airborne concentrations to every 5 years. As a

means of determining exposure conditions and setting a new baseline for monitoring frequency, air monitoring must be conducted every 5 years, regardless of the initial monitoring results.

While the EPA's exposure limits are lower than those found in OSHA's MC standard, the EPA regulation incorporates OSHA's requirements for regulated areas, PPE including respiratory protection and training content. The EPA regulation provides guidance for its newly established requirements for the written exposure control plan, recordkeeping and employee notification of sampling results.

Another key date for compliance includes providing dermal and respiratory protection by August 1, 2025, if applicable. More detailed information can be found through the links listed in the "Resources" section below.

Industries impacted by the continued use of MC are encouraged to consult with experts for assistance. Although WisCon offers OSHA focused consultation services, we can provide employee exposure monitoring and guidance to safeguard worker health. Small businesses in Wisconsin can also contact the Wisconsin [Small Business Environmental Assistance Program \(SBEAP\)](#) for assistance with environmental compliance.

## Resources:

[Fact sheet](#): Regulation of Methylene Chloride under TSCA

[Compliance Guide](#): EPA Guide to Complying with the 2024 Methylene Chloride Regulation under the Toxic Substances Control Act (TSCA).

Wisconsin Safety and Health Consultation Program

Phone: (800) 947-0553 | Email: [wiscon@slh.wisc.edu](mailto:wiscon@slh.wisc.edu)

<http://slh.wisc.edu/wiscon>

WisCon Public Sector Consultation

Phone: (608) 262-6763 | Email: [publicsectorconsulting@slh.wisc.edu](mailto:publicsectorconsulting@slh.wisc.edu)

[Request Services](#)