EPA's SBAR Panel Outreach Meeting with Small Entity Representatives on Proposed Rulemaking for Methylene Chloride under TSCA Section 6(a)

Panel Outreach SER Questions for Discussion

These are informal questions that aim to guide discussion on your work practices and your experiences with this chemical. We are not seeking a structured response on each question; rather, we are interested in any feedback or details you can provide, and hope that these questions let you know what type of information would be most useful as we consider advice from the small entity representatives.

If you are interested in providing this or other information in writing, please see the contact information below.

We ask that you refrain from providing Confidential Business information (CBI) during the discussion or in email to EPA. If you choose to provide CBI, we will provide special instructions.

See *Condition of Use Discussion Groups* at the end for a list of conditions of use by group.

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1) Your business *(Questions for all groups)*

a. How does your organization use methylene chloride? How much methylene chloride does your organization use?
b. Does your organization still use methylene chloride? What is the trend of use? For example, has your organization increased use of methylene chloride? Has use remained constant? Is use decreasing? Is your organization phasing out the use of methylene chloride?
c. Can you describe the specific use, as well as the workplace and workplace setting where methylene chloride is used?
d. Why does your organization use methylene chloride? What function does methylene chloride provide?
e. Where is your organization in the supply chain? (e.g., are you a processor – formulating another product with methylene chloride, a distributor, or final user of methylene chloride in an application?). Do you provide finished product to another small entity or to a large entity?
f. For what industries or applications do you provide products or services for? (e.g., aerospace, electronics, military, automotive, optics, museums/art restorations, academic, commercial laboratory, consumers, other)

g. For what process are you using methylene chloride? (can be more than one, such as cleaning, drying, inspection, etc.)
h. If methylene chloride were not available, how would you adjust and what would the impacts be on your business?
i. What are the benefits to your business of methylene chloride? Are there specific benefits for small businesses using methylene chloride as compared to benefits for larger businesses?

2) Workplace exposure *(Questions for all groups)*

a. How many employees, and what fraction of your employees, are exposed to methylene chloride, and for how long (days/year and hours/day)?
b. If you use a product containing methylene chloride, what product do you use and what is the concentration of methylene chloride in the product?
c. What work activities result in worker exposure to methylene chloride? And what type of exposure (dermal, inhalation)?
d. For each activity, in what physical state and concentration is methylene chloride?
e. Have you taken industrial hygiene monitoring data? If so, what was typical and high-end exposure to methylene chloride?
f. What engineering controls are used to minimize exposure to methylene chloride? How effective are those controls?
    i. Would it be feasible to use additional engineering controls to minimize exposure to methylene chloride? If so, what might those engineering controls be?
    ii. What is your experience with:
        - Installing or updating ventilation and local exhaust, or
        - Equipment changes to reduce exposure?
g. What administrative controls and training do you use to minimize exposure to methylene chloride? Do you use training to minimize exposure to methylene chloride?
h. Is personal protective equipment (PPE) is regularly worn by workers to minimize exposure to methylene chloride?
    i. If yes, could you provide more information regarding the type of PPE that is used? And would it be feasible to use PPE that provided a level of protection beyond what you are already using? Do you have experience with air supplied respirators? Do you have experience with other PPE?
    ii. If no, would it be feasible to have workers wear PPE to minimize their exposure to methylene chloride? And what PPE would be feasible for workers to wear?
i. How many employees are located in the same room where the work activities related to methylene chloride are taking place but not necessarily handling methylene chloride?
j. What do you do to comply with OSHA standards for methylene chloride?

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3) **Regulatory options** ***(Questions for all groups)***

a. Which of the regulatory options presented today would you recommend?
b. Cost estimates: In your experience, are the cost estimates reasonably representative? Do you have additional information to improve the cost estimates?
c. Can you think of ways to add flexibility to this rulemaking for your small businesses?
d. How do you learn about EPA regulations and what you should do to comply?
e. What is the best way to reach out to members of your industry?

4) **Additional questions for users of products containing methylene chloride: substitutes and alternatives** ***(Questions for groups 1 – 5)***

a. What chemicals or processes have you considered as an alternative to using methylene chloride or a product containing methylene chloride? Why? How do these chemicals or processes compare to current use containing methylene chloride? More specifically:
   i. Do you currently use any alternatives to methylene chloride (or product)?
   ii. Did you try to switch to another chemical, product, or process only to switch back? If so, what did you switch to, why did you switch back, and what made you switch in the first place?
   iii. What are the relative advantages and disadvantages of different substitutes and/or processes that you have considered, including in terms of exposure, cost, and hazard?
   iv. Provide specific information related to each substitute chemical, product, or process related to the use of alternative chemicals/products and compare to methylene chloride:
      - Identification of alternative chemical/product/process
      - How much of the alternative product/chemical would be needed to perform same activity
      - Capital costs including new equipment, retrofitting of old equipment, etc. of using the alternative chemical/process, loss of use of existing equipment
      - Number of workers required, amount of worker time required
      - Number of workers exposed
      - Costs associated with transitioning to the alternative chemical (e.g., identifying and testing the alternative chemical/process, production downtime during the transition, lost productivity while learning how to use the alternative efficiently)
      - Process changes required (e.g., additional time to complete task, additional steps, etc.)
      - Energy usage
      - Other operation and maintenance costs (e.g., filters, tank cleanings, etc.)
      - Changes in production or output of operation
      - Releases of alternative chemicals/products
      - Waste and disposal costs associated with alternative chemical/process

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- Changes in your product/service quality
- Training, medical surveillance, or other employee-related costs
- Recordkeeping burden/costs
- Monitoring and testing costs

5) Additional questions for distributors and retailers *(Questions for group 6)*

a. How much of your business is supplying products containing methylene chloride to consumers? How much of your business is supplying products containing methylene chloride to commercial or industrial users?
b. If you could no longer sell products containing methylene chloride, how would this impact your business?
c. Do you also sell products designed for the same application or use that do not contain methylene chloride?
    i. If yes, what is the relative share of sales for the product(s) containing methylene chloride compared to the products that do not contain methylene chloride?
d. Are there particular challenges to small business doing distribution of products containing methylene chloride that are different from large distributors?
e. What is your preferred method of downstream notification?
f. If you were required to limit sales of methylene chloride containing products to only persons who were certified to purchase it, what activities and costs would be involved? What guidance would be helpful from the Agency?

6) Additional questions for formulators of products containing methylene chloride: substitutes and alternatives *(Questions for group 7)*

a. Product reformulation:
    i. How often do you reformulate your products?
    ii. What is the typical cost of reformulating your products?
    iii. What might reformulation costs be if you needed to reformulate your products without methylene chloride? (e.g., costs associated with research and development, testing, capital costs of production changes, packaging, labeling)
b. Product relabeling:
    i. How often do you relabel your products?
    ii. What is the typical cost of relabeling?
c. Alternatives:
    i. Do you sell another product that does not contain methylene chloride that is designed for the same use or application as the methylene chloride product?
        - If yes:
            - What solvent replaces methylene chloride in the alternative product?
            - How does the alternative product compare in terms of safety, efficacy, and cost?

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- If no:
    - If you need to reformulate this product with a lower concentration of methylene chloride, what would be the implications for the product in terms of cost and efficacy?
    - If you need to reformulate this product without methylene chloride, what solvent would replace methylene chloride in the alternative product? How do you think the alternative product would compare in terms of efficacy and cost?

ii. Is there a subset of uses for your product where using a product formulated without methylene chloride would be problematic?

Condition of Use Discussion Groups

Group 1: Industrial vapor degreasing and cold cleaning uses:

- Includes the following conditions of use:
    - Industrial and commercial use as solvent for batch vapor degreasing
    - Industrial and commercial use as solvent for in-line vapor degreasing
    - Industrial and commercial use as solvent for cold cleaning

Group 2: Commercial use of paints, coatings and their removers:

- Includes the following conditions of use:
    - Industrial and commercial use in paints and coatings
    - Industrial and commercial use in paint and coating removers

Group 3: Industrial and commercial use of packaged or "off-the-shelf" formulated products (except commercial users of paint, coatings, and their removers):

- Includes the following conditions of use:
    - Industrial and commercial use as solvent for aerosol spray degreaser/cleaner
    - Industrial and commercial use in metal aerosol degreasers
    - Industrial and commercial use in aerosol degreasers and cleaners
    - Industrial and commercial use in adhesives, sealants and caulks
    - Industrial and commercial use in cold pipe insulations
    - Industrial and commercial use in anti-spatter welding aerosol
    - Industrial and commercial use for spot removers for apparel and textiles
    - Industrial and commercial use for apparel and footwear care products
    - Industrial and commercial use for finishing products for fabric, textiles, and leather
    - Industrial and commercial use in liquid lubricants and greases
    - Industrial and commercial use in spray lubricants and greases
    - Industrial and commercial use in adhesive and caulk removers

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- Industrial and commercial use in carbon remover, wood flood cleaner, and brush cleaner
- Industrial and commercial use in automotive care products (functional fluids for air conditioners)
- Industrial and commercial use in automotive care products (interior car care)
- Industrial and commercial use in automotive care products (degreasers)
- Industrial and commercial use in non-aerosol degreasers and cleaners
- Industrial and commercial use in metal non-aerosol degreasers

Group 4: Industrial use of formulations made on on-site or facility-specific formulations containing methylene chloride:

- Includes the following conditions of use:
  - Industrial and commercial use in adhesives, sealants and caulks
  - Industrial and commercial use in paint and coating removers
  - Industrial and commercial use in adhesive and caulk removers
  - Industrial and commercial use in liquid lubricants and greases
  - Industrial and commercial use in spray lubricants and greases
  - Industrial and commercial use in lithographic printing plate cleaner
  - Industrial and commercial use in carbon remover, wood flood cleaner, and brush cleaner

Group 5: Other industrial and commercial uses:

- Includes the following conditions of use:
  - Industrial and commercial use for electrical equipment, appliance, and component manufacturing
  - Industrial and commercial use for plastic and rubber products manufacturing
  - Industrial and commercial use in cellulose triacetate film production
  - Industrial and commercial use in toys, playground and sporting equipment
  - Industrial and commercial use as propellant and blowing agent
  - Industrial and commercial use as a processing aid

Group 6: Retailers and distributors, consumer uses:

- Retailers or distributors of methylene chloride or products containing methylene chloride under any of the conditions of use in the scope of the rulemaking, including:
  - Consumer use as solvent in aerosol degreasers/cleaners
  - Consumer use in adhesives and sealants
  - Consumer use in brush cleaners for paints and coatings
  - Consumer use in adhesive and caulk removers
  - Consumer use in metal degreasers
  - Consumer use in automotive care products (functional fluids for air conditioners)
  - Consumer use in automotive care products (degreasers)
  - Consumer use in lubricants and greases
  - Consumer use in cold pipe insulation

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- Consumer use in arts, crafts, and hobby materials glue
- Consumer use in an anti-spatter welding aerosol
- Consumer use in carbon removers and other brush cleaners

Group 7: Formulators and processors:

- Formulators of products containing methylene chloride under any of the conditions of use in the scope of the rulemaking, including:
    - Processing – incorporation into a formulation, mixture, or reaction products
    - Industrial and commercial use as a solvent that becomes part of a formulation

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