



Date: 6/20/2019

To: Zep Sales and Marketing

From: Suhail K. Massad, Ph.D.
V.P., R&D and Regulatory Affairs

Subject: Subject: 2019 Methylene Chloride US EPA TSCA 6(a) Rule and California Department of Toxic Substance Control (DTSC)-CalSAFER-Prohibition of Methylene Chloride in Paint Strippers

Dear Colleagues,

On March 27, 2019 the United States Environmental Protection Agency (EPA) published the final rule for 40 CFR Part 751, Methylene Chloride: Regulation of Paint and Coating Removal for Consumer Use Under TSCA (Toxic Substances Control Act) Section 6(a). Effective May 28, 2019, this final rule:

1. Prohibits the use of Methylene Chloride in consumer paint and coating removal products after November 22, 2019
2. Prohibits the distribution of Methylene Chloride based paint and coating removal products to retailers after November 22, 2019
3. Prohibits retailers from selling Methylene Chloride based paint and coating removal products after November 22, 2019
4. The rule does not impact GHS labeled Methylene Chloride paint and coating removal products for industrial and institutional use applications
5. EPA is requiring that the following verbiage be added to the SDS of all methylene chloride containing products: "This chemical/ product is not and cannot be distributed in commerce (as defined in TSCA section 3(5)) or processed (as defined in TSCA section 3(13)) for consumer paint or coating removal."

In addition to the US EPA rule, the California Department of Toxic Substance Control (DTSC), has banned the distribution of Methylene Chloride paint and coating removal products in the stream of commerce within the state of California after September 29, 2019. The DTSC requires manufacturer and all distribution channels to remove such products from commerce by September 29, 2019.

These regulations apply to manufacturers, distributors and resellers of Methylene Chloride Paint and Coating removal products. Strict adherence to the regulation is mandatory, therefore, CSR, TSR and Inside Sales representatives will **not** be allowed to sell these types of products to distributors and resellers.

In summary, US EPA banned the distribution of Methylene Chloride paint and coating removal from the retail consumer market place in all 50 states after November 22, 2019. The California DTSC banned the distribution of Methylene Chloride paint and coating removal products within the state after September 29, 2019. There will be a follow up communication from Marketing regarding products impacted and SKU dispositions.

Please let me know if there are any question regarding the regulation.