



January 19, 2026

Submitted via email: [Whitby.Daniel@epa.gov](mailto:Whitby.Daniel@epa.gov)

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1200 Pennsylvania Avenue NW  
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**Re: AIA input on ICR Renewal Methylene Chloride Regulation under TSCA Section 6**

Dear Mr. Whitby,

The Aerospace Industries Association (AIA) appreciates the opportunity to provide input on the proposed renewal of the Information Collection Request (ICR) for the Methylene Chloride Regulation under TSCA section 6 and the EPA's outreach to potential respondents as part of the Paperwork Reduction Act consultation process.

Founded in 1919, AIA is the premier trade association representing approximately 340 major aerospace and defense manufacturers and suppliers. Our members represent the United States of America's leading manufacturers and suppliers of civil, military, and business aircraft, helicopters, unmanned aerial systems, missiles, space systems, aircraft engines, material, and related components, equipment services, and information technology. AIA members include various entities that will be subject to the TSCA Section 6 Methylene Chloride rule as well as associated reporting requirements. We are pleased to provide the following comments.

**Burdensome Paperwork Requirements**

AIA has significant concerns that the Workplace Chemical Protection Program (WCPP) documentation and recordkeeping requirements under the methylene chloride final rule impose substantial administrative burdens that go well beyond established industrial hygiene practice, with limited additional practical utility. For example, the rule requires the exposure control plan to identify all exposure controls considered — including those used and those not used in sequence with the NIOSH hierarchy-of-controls requirements — and to document why any controls not selected were infeasible, ineffective, or otherwise not implemented. This level of required documentation creates paperwork complexity without delivering tangible worker safety benefits.

Such prescriptiveness will drive significant compliance effort toward administrative record generation and internal coordination rather than toward substantive exposure reduction, with aerospace companies needing to develop complex processes to define and justify documentation, despite long histories of OSHA compliance and industrial hygiene monitoring that did not previously require this level of formalized documentation. These burdens are further compounded by concurrent compliance obligations for multiple chemical-specific WCPPs, since differences in WCPP requirements and timelines mean each rule demands separate, detailed review and implementation.

**Accuracy of EPA's Burden Estimates**

AIA members believe EPA's estimates of the burden associated with the proposed information collection significantly understate the actual level of effort required to comply with the methylene



chloride WCPP, particularly with respect to exposure monitoring, recordkeeping, and exposure control plan documentation.

As detailed in the American Chemistry Council's comments submitted to the ICR docket<sup>1</sup>, empirical data from ACC member companies demonstrate large gaps between EPA's estimated burdens and real-world experience. ACC's Table 2 shows that EPA's assumptions—for example, one hour for rule familiarization, 2.9 hours for respiratory recordkeeping, and 0.28 hours for notification per monitoring event—contrast sharply with member-reported burdens that run into tens of hundreds of hours, and in some cases hundreds of hours per year.

From an aerospace and defense manufacturing perspective, these obligations translate into substantial company-level effort that is not reflected in EPA's burden estimates. Each employee with WCPP responsibilities must understand their role, and companies must perform significant preparatory and coordination activities to achieve consistent site- and application-level compliance. AIA member companies report that this includes:

- individual familiarization with the regulation by responsible personnel;
- cross-functional and working-level meetings to interpret and operationalize WCPP requirements;
- development of documents, procedures, and training materials to support compliance; and
- dissemination and ongoing support of those tools to the teams that will use them.

In addition to general WCPP implementation activities, the aerospace and defense industry faces a rule-specific obligation to restrict methylene chloride-containing paint stripper use to parts considered safety-critical and corrosion-sensitive. Historically, companies did not need to identify or document which parts met those precise definitions; significant time is now required to develop processes and documentation to demonstrate which parts are covered while simultaneously transitioning non-covered parts to methylene chloride-free alternatives.

These activities represent significant labor investments that extend well beyond the per-event or per-employee assumptions used in EPA's economic analysis.

### **Conclusion**

For these reasons, AIA encourages EPA, in renewing the ICR, to revisit its burden assumptions and more fully account for the cumulative documentation, coordination, and recordkeeping effort required to implement the methylene chloride WCPP, drawing on industry-reported data to ensure the estimates accurately reflect real-world compliance.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Hyde', is positioned below the word 'Sincerely,'. The signature is fluid and somewhat stylized, with a long horizontal stroke extending to the right.

**David Hyde**

Senior Director, Civil Aviation Strategy, Innovation & Environmental Affairs  
Aerospace Industries Association

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<sup>1</sup> American Chemistry Council (ACC), "Comments on EPA ICR 2556.04 for Methylene Chloride Rule," Docket ID EPA-HQ-OPPT-2021-0303, Document No. EPA-HQ-OPPT-2021-0303-0012 (October 24, 2025).