

Regulatory Updates
Compiled for the Pine Chemicals Association
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UPCOMING CONFERENCES

2026 ASSP Conference, Anaheim CA, 6/15-17/2026

2026 NSC Conference and Expo, Indianapolis IN, 9/14-16/2026

SAFETY

Ten Most Cited OSHA Violations for 2025 Revealed – “The Occupational Safety and Health Administration has announced its most frequently cited workplace safety standards for fiscal year 2025, with Fall Protection – General Requirements topping the list for the 15th straight year. The preliminary data, revealed during the 2025 NSC Safety Congress & Expo – the world’s largest annual gathering of safety professionals – highlights persistent compliance issues and the need for stronger safety efforts across industries. The Top 10 most frequently cited workplace safety standards are:

1. Fall Protection – General Requirements (1926.501): 5,914 violations
2. Hazard Communication (1910.1200): 2,546
3. Ladders (1926.1053): 2,405
4. Lockout/Tagout (1910.147): 2,177
5. Respiratory Protection (1910.134): 1,953
6. Fall Protection – Training Requirements (1926.503): 1,907
7. Scaffolding (1926.451): 1,905
8. Powered Industrial Trucks (1910.178): 1,826
9. Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102): 1,665
10. Machine Guarding (1910.212): 1,239

“While progress has been made in many workplaces, the consistency in citation rankings year after year signals there is more work ahead,” said Lorraine Martin, NSC CEO. “The safety community must intensify our efforts to better protect workers and save lives. We can do this through robust training, updated metrics, high-hazard identification and control implementation, coupled with employee engagement and leadership accountability.” (nsc.org, 9/16/2026.)

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ENVIRONMENT

EPA: 5-Copy Hazardous Waste Manifest Form OK to Use Until Further Notice - “In updated guidance posted on September 10, 2025, EPA states that the agency will continue to accept the 5-copy hazardous waste manifest form ‘until further notice.’ The 5-copy manifest form was set to become obsolete on December 1, 2025, when EPA’s “third rule” concerning e-Manifests enters full effect. Some provisions of this rule have been in effect since January of this year. Per the [updated EPA guidance](#), stakeholders can expect 90 days advance notice before EPA will stop accepting the “old” 5-copy paper manifest form. From the updated guidance on EPA.gov, EPA is announcing updated guidance regarding the use of old 5-copy paper manifest forms following the third rule’s effective date of January 22, 2025. . .EPA will provide a 90-day advance notice of when we intend to cease acceptance of the 5-copy forms.” Read more [here](#). (Lion Technology, Inc., 9/12/2025.)

EPA Proposes to Eliminate Greenhouse Gas Reporting Program - “The U.S. Environmental Protection Agency (EPA) [announced a proposal to end the Greenhouse Gas Reporting Program \(GHGRP\), citing high compliance costs and limited regulatory value](#). EPA estimates that eliminating the program could save U.S. businesses up to \$2.4 billion annually.” Read more [here](#). (National Law Review, Brook J. Detterman, et al. at Beveridge & Diamond PC, 9/25/2025.)

TSCA TCE Rules Postponed, PCE Rule To Be Reconsidered - “EPA will allow two uses of trichloroethylene (TCE) to continue beyond the compliance deadlines set in the 2024 Final Rule that ‘banned’ manufacture, processing, distribution in commerce, and use of the chemical. EPA is extending the compliance date for the following conditions of use or ‘COUs:’

- Use of TCE as a processing aid in the manufacture of nuclear fuel until 9/15/2028, and
- Disposal of TCE to wastewater by processors of TCE as a reactant/intermediate and for processors and industrial and commercial users of TCE as a processing aid, until 12/18/2026.

An Interim Final Rule appeared in the [Federal Register on September 17, 2025](#).

“EPA has [further postponed the deadline for workplaces](#) that use trichloroethylene (TCE) to comply with new requirements for monitoring and controlling exposure under TSCA §6(a). The postponed requirements apply to uses of TCE that are exempt from the December 2024 Final Rule prohibiting and/or phasing-out all activity involving the chemical. Following EPA’s earlier postponement, the rule was set to take effect on August 19. The scheduled effective date is now November 17, 2025.” Read more [here](#). (Lion Technology, Inc., 9/17/2025.)

Where is the RCRA Generator Improvements Rule in Effect? - “As of September 16, 2025, forty-two (42) states and Washington D.C. have adopted part or all of the RCRA Generator Improvements Rule. On the map [included in the link], states in blue have adopted (at least) the mandatory changes from EPA’s 2016 Final Rule.” Click [here](#) to read more and see the map. (Lion Technology, Inc., Roger Marks, 9/16/2025.)

How to Ship Hazardous Waste Samples - “The Department of Transportation (DOT) requires shippers to accurately classify, name, and package hazardous materials for offsite shipment (49 CFR 173.22(a)). But how can you be accurate if you don’t have all the information you need about a waste? Most likely, you’ll want to send a sample to a laboratory for testing. . A sample of solid waste or a sample of water, soil, or air, which is collected for the sole purpose of testing to determine its characteristics or composition, is not subject the RCRA hazardous waste regulations if it meets certain criteria specified at 40 CFR 261.4(d). The sample may still be regulated as a DOT hazardous *material*, however.” Click [here](#) to read more. (Lion Technology, Inc., Roseanne Bottone, 4/19/2021.)

Send your suggestions and comments to ehs@pinechemicals.org

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