

Followback Evaluation of Lead and Noise Exposures at an Indoor Firing Range

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The cover photo is a close-up image of sorbent tubes, which are used by the HHE Program to measure airborne exposures. This photo is an artistic representation that may not be related to this Health Hazard Evaluation. Photo by NIOSH.

Highlights of this Evaluation

The Health Hazard Evaluation Program received a request from an indoor firing range. The employer was concerned about lead and noise exposures during firearms qualification. This followback evaluation took place after the installation of a new ventilation system.

What We Did

- We reevaluated the firing range in June 2012.
- We measured airflow in each bay of the firing range.
- We collected personal air samples for lead on instructors, shooters, and the hazardous materials technician.
- We collected area air samples for lead in the firing range, firearms cleaning area, classroom, lunchroom, and offices.
- We collected surface vacuum samples for lead. We sampled inside work and personal vehicles and from carpeted floors, rugs, and mats in the complex.
- We collected surface wipe samples for lead. We sampled in the firing range, firearms cleaning area, classroom, lunchroom, armory, offices, and in work and personal vehicles.
- We reviewed medical monitoring results of instructors and the hazardous materials technician.

We reevaluated lead exposures at an indoor firing range. Airborne exposures decreased after a new ventilation system was installed. We found lead on work surfaces and in vehicles. We measured high noise levels during firearms qualifications. Recommendations include eliminating dry sweeping, changing clothing before leaving the complex, and continuing the use of dual hearing protection.

What We Found

- Airflow along and downrange of the firing line met National Institute for Occupational Safety and Health recommendations.
- The firing range was still dry swept during cleaning.
- Instructors' and shooters' exposures to lead in the air were below occupational exposure limits.
- High levels of lead in the air were detected when cleaning behind the bullet trap.
- Low levels of lead were found in air from the firing range and firearms cleaning area.
- Surface wipe and vacuum samples detected lead throughout the complex and in work and personal vehicles.

What the Employer Can Do

- Do not dry sweep the firing range. Clean the floor with an explosion-proof vacuum cleaner that has high-efficiency particulate air filters.
- Remove carpet and rugs in the complex.
- Improve general housekeeping practices in the lunchroom, classroom, and offices.

What the Employer Can Do (continued)

- Provide instructors and the hazardous materials technician with lockers in an area that allows street clothes and shoes to be stored separately from lead-contaminated work clothes and shoes. Personal clothing should be left in a clean locker.
- Provide disposable shoe covers and coveralls.
- Require instructors and shooters to use lead removal wipes and wash their hands and faces with lead removal soap before eating, drinking, or contact with others.
- Provide instructors and shooters annual training and educational materials about the health effects of exposure to lead (including the risks of take-home exposure) and noise.

What the Employees Can Do

- Do not eat, drink, chew gum, or use tobacco in the firearms cleaning area, classroom, or firing range.
- Continue to wear dual hearing protection while in the firing range. Dual hearing protection includes ear plugs and earmuffs.
- Wash your hands and face thoroughly with lead removal soap before eating, drinking, or contact with others. Use lead removal wipes to clean your hands.
- Wear shoe covers and coveralls in the range. Leave your range shoes at the range.
- Shower at the end of the work day and put on your clean personal clothes prior to leaving the complex.
- Wash clothes worn in the firing range at the firing complex.
- Report health concerns to your employer. If needed, seek medical care.

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Abbreviations

cm ²	Square centimeter
µg/dL	Micrograms per deciliter
µg/m ³	Micrograms per cubic meter
ACGIH®	American Conference of Governmental Industrial Hygienists
BLL	Blood lead level
CFR	Code of Federal Regulations
dB	Decibels
dBA	Decibels, A-weighted
HEPA	High-efficiency particulate air
HHE	Health hazard evaluation
Hz	Hertz
MDC	Minimum detectable concentration
MQC	Minimum quantifiable concentration
ND	Not detected
NIOSH	National Institute for Occupational Safety and Health
OEL	Occupational exposure limit
OSHA	Occupational Safety and Health Administration
PEL	Permissible exposure limit
REL	Recommended exposure limit
SLM	Sound level meter
TLV®	Threshold limit value
TWA	Time-weighted average

Introduction

The Health Hazard Evaluation (HHE) Program received a request from managers concerning lead and noise exposures at an indoor firing range in California. This report is a follow-up to our 2009 evaluation, in which investigators measured airborne lead exposures above occupational exposure limits (OELs) among instructors, shooters, and a hazardous materials technician and provided recommendations to reduce lead exposures at the range [NIOSH 2011]. In response, the employer redesigned the range ventilation system, removed carpeting, added step-off cleaning pads at the firing range exit, mandated full facepiece powered air purifying respirator use by the hazardous materials technician, and improved cleaning procedures. We returned in June 2012 to reassess lead and noise exposures.

Methods

Air Sampling for Lead

We collected full-shift personal air samples over 2 days on instructors and a hazardous materials technician. We also collected task-based air samples on shooters during qualifications and firearms cleaning. Task-based samples were also collected on the hazardous materials technician during high-efficiency particulate air (HEPA) vacuum use, dry sweeping, and cleaning behind the bullet trap. We collected area air samples in the hazardous materials technician's office, range office, armory, classroom, firearms cleaning area, lunchroom, and firing range. Samples were analyzed according to National Institute for Occupational Safety and Health (NIOSH) Method 7303 [NIOSH 2013].

Surface Sampling for Lead

We collected and analyzed vacuum samples for lead on porous surfaces according to NIOSH Methods 9102 and 7303 [NIOSH 2013]. We took vacuum samples in the range and range complex, and in instructors' and the hazardous materials technician's personal and work vehicles. We used a 100 square centimeter (cm²) template when collecting vacuum samples on flat surfaces.

We collected and analyzed wipe samples for lead on nonporous surfaces according to NIOSH Method 9102 [NIOSH 2013]. We took samples from the range office, armory, classroom, lunchroom, firing range, and personal and work vehicles. We also took samples of the hazardous materials technician's respirator both inside the face mask and on the battery and motor. We used a 100 cm² template to collect wipe samples on flat surfaces, and estimated 100 cm² of sample area on irregularly shaped or uneven surfaces.

We used commercially available dust wipes (SKC Inc., Full Disclosure® Instant Wipes) to qualitatively evaluate lead contamination on skin, clothing, and shoes. After the instructors, shooters, and hazardous materials technician left the firing range, we collected wipes on their hands, pants, and boots. Wipe samples were collected from the palm of each hand, one thigh,

and the bottom of one boot. We estimated an area of 100 cm² on these wipe samples. The visual limit of identification for the wipes was approximately 17–20 micrograms per sample.

Ventilation

We reviewed the ventilation drawings and recent test and balance report, and visually inspected the ventilation systems for the entire firing range complex. We used a TSI VelociCalc® Plus Model 8386A to measure airflow at the firing line and at the bullet trap downrange when the range was empty. We took triplicate measurements in each lane along the firing line and at the bullet trap at approximately 3 feet and 5 feet. We averaged the measurements for each location, and compared them to the NIOSH recommended values. We were unable to evaluate airflow patterns in the range with a theatrical fog machine as planned because of a smoke sensor in the exhaust ventilation system.

Noise

We collected 16 time-weighted average (TWA) personal noise exposure measurements over 2 days on six shooters, six firing range instructors, and the hazardous materials technician. We measured personal noise exposures with Larson Davis Spark™ model 706RC or 705P integrating noise dosimeters. The dosimeters measured noise using three different settings to compare with the three noise exposure limits referenced in this report; the Occupational Safety and Health Administration (OSHA) permissible exposure limit (PEL), OSHA action level, and NIOSH recommended exposure limit (REL). Shooters and instructors wore noise dosimeters on day 1 of sampling. Instructors wore dosimeters on day 2 of sampling. We also measured area noise levels and took octave band measurements (noise levels in different frequencies) using two Larson Davis System 824 sound level meters (SLMs) and real-time frequency analyzers. We mounted the SLMs on tripods at a height of approximately 5 feet to represent the ear position of a standing shooter. We placed the tripods with SLMs in the middle of each group of shooters approximately 4–6 feet behind the student, where the instructors normally stood. Because of safety concerns and risk of interfering with shooters and instructors, we were not able to place SLMs closer during qualifications.

Medical Records Evaluation

We reviewed blood lead levels (BLLs) from 2008–2013 for instructors and the hazardous materials technician. BLLs were initially collected by the employer as part of OSHA mandated medical surveillance for lead, but the employer continued to offer testing to employees on a yearly basis as a service even when it was no longer required.

Results

Lead

The instructors' full-shift TWA lead exposure concentrations ranged from 0.15–3.8 micrograms per cubic meter (µg/m³) over the sampling period (345–488 minutes). Instructors spent up to 4 hours in the range on any given day and the remainder of the time was spent

in the classroom or office. Results of the air sampling for lead on individual instructors are presented in Appendix A, Table A1.

The shooters' task-based TWA lead concentrations ranged from 1.5–9.0 $\mu\text{g}/\text{m}^3$ over the sampling periods (147–200 minutes). Shooters spent approximately 1 hour in the classroom and 3 hours in the range and firearms cleaning area. The remainder of the day was spent in defensive tactics training in another section of the complex. Air sampling for lead on shooters was done while they were in the range and when cleaning their firearms. These results are presented in Appendix A, Table A2.

Full-shift and task-based air sampling results for lead on the hazardous materials technician are presented in Table 1. The hazardous materials technician's daily range cleaning activities included using a HEPA vacuum behind the firing line and dry sweeping down range. The lead concentrations for these tasks ranged from not detected (ND) ($< 0.3 \mu\text{g}/\text{m}^3$)–7.3 $\mu\text{g}/\text{m}^3$. The technician also used a HEPA vacuum behind the bullet trap approximately once a week. On June 5, 2012, the hazardous materials technician began cleaning the area behind the bullet trap but stopped so that qualifications could resume in the range. This task was usually completed in 1 day; however, in this case, the task was completed the following day. We used the same sample collection cassette for cleaning activities on June 5 (8 minutes) and June 6 (37 minutes), to meet the minimum sample volume recommended in the NIOSH sampling and analytical method. The airborne lead concentration during the task of cleaning behind the bullet trap was 330 $\mu\text{g}/\text{m}^3$. The technician's full-shift exposure to airborne lead exceeded the OSHA action level of 30 $\mu\text{g}/\text{m}^3$ on June 6, 2012. This exposure corresponded to the day that he spent 37 minutes cleaning behind the bullet trap. We did not collect any task-based samples for tasks outside the range, which included changing filters, completing paperwork, and occasionally travelling offsite.

Table 1. Concentrations of lead on personal air samples of the hazardous materials technician

Date	Location	Sample time (minutes)	Sample concentration ($\mu\text{g}/\text{m}^3$)
6/5/2012	Full-shift	440	1.6
	Task–HEPA vacuum front of range	27	ND*
	Task–dry sweep downrange	61	7.3
6/6/2012	Full-shift	480	34†
	Task–clean behind bullet trap	45	330‡

*Below the minimum detectable concentration (MDC) (0.3 $\mu\text{g}/\text{m}^3$).

†A full-shift concentration was calculated assuming no exposure for 173 minutes while offsite performing a delivery. The concentration for the sample time of 307 minutes was 53 $\mu\text{g}/\text{m}^3$.

‡This sample also includes 8 minutes spent cleaning behind the range on 6/5/2012.

Results of the area air sampling for lead are in Appendix A, Table A3. The lead concentrations ranged from ND ($< 0.09 \mu\text{g}/\text{m}^3$)–3.3 $\mu\text{g}/\text{m}^3$. Most results were low or at a concentration between the MDC and the minimum quantifiable concentration (MQC).

The range of surface sampling results is shown in Table 2. These results showed the presence of lead on work surfaces outside the range, including work and personal vehicles. Surface vacuum sample results are presented in Appendix A, Table A4 and surface wipe sample results are presented in Appendix A, Table A5.

Table 2. Summary of lead concentrations in surface vacuum and wipe samples

Sample location	Number of samples	Sample concentration (µg/100 cm ²)
Range surfaces	27	ND*–96
Personal vehicles	14	ND*–21
Work vehicles	11	0.72–120

*Below the MDC (0.4 µg/100cm²)

We did qualitative sampling for the presence of lead on hands, shoes, and pants for 5 instructors, 5 shooters, and the hazardous materials technician. All of the samples taken on shoes and pants were above the limit of visual identification. All of the samples taken on shooters hands were above the limit of visual identification. All but one of the samples on instructor's hands was above the limit of visual identification; the one instructor who tested negative had used lead removal wipes when leaving the range. The hazardous materials technician's hands also tested negative, it was noted that he had washed his hands prior to sampling.

Ventilation

The new ventilation system was a push-pull ventilation system typically seen in indoor firing ranges. The system was computer controlled with several alarms and a pressure sensor to alert staff of system failures. Four separate ventilation systems served the range with one



Figure 1. Location of radial air diffusers in an indoor firing range. Photo by NIOSH.

system serving each firing bay (eight firing lanes). Each system was designed to supply approximately 21,000 cubic feet per minute of air and exhaust approximately 24,000 cubic feet per minute of air. The ventilation systems were separate from the rest of the complex and were designed to allow air to travel from uprange to downrange, from contaminated to less contaminated areas. Supply air was delivered by perforated radial air diffusers mounted at ceiling height along the back wall

of the range. The radial diffusers were approximately 16 feet behind the firing line, except near the entry door, the range officers' desk, and the far end of the range where they were approximately 10 feet behind the firing line. Figure 1 is a picture of the radial air diffusers. Air was exhausted from the range at the bullet trap, which was about 75 feet from the firing line. Exhaust air passed through HEPA filters before delivery to the outdoor ambient environment.

A summary of the ventilation flow rate measurements is provided in Figure 2. Appendix A, Tables A6–A9 provide the supply airflow measurement data for each of the lanes. Since our previous site visit in December 2009, bay 4 had been converted from a special weapons and tactics training bay to a traditional bay with eight qualification lanes.

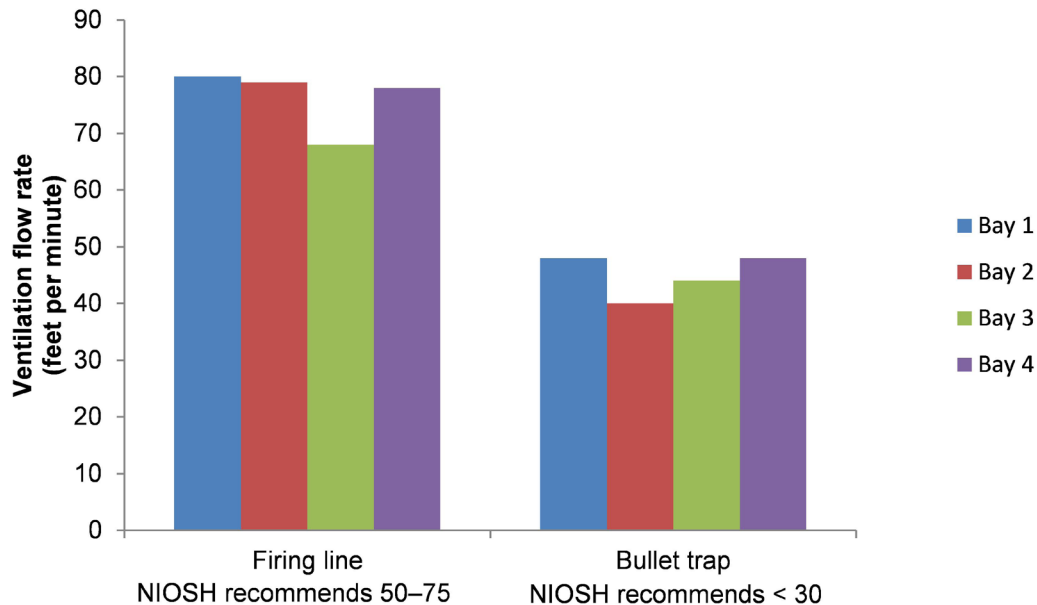


Figure 2. A graph showing a summary of the ventilation flow rates for each bay of the firing range.

Noise

Full shift personal noise monitoring results for instructors and the hazardous materials technician are provided in Appendix A, Table A10. All instructors' TWA noise exposures exceeded the NIOSH REL, OSHA action level, and OSHA PEL. Their full shift noise exposures ranged from 95–101 decibels, A-weighted (dBA), using OSHA criteria and from 106–110 dBA using NIOSH criteria. The hazardous materials technician's full shift noise exposure was below OELs. TWA noise monitoring results for shooters are provided in Appendix A, Table A11. Shooters wore noise dosimeters for 2.5–3 hours during qualification exercises and firearms cleaning. Their noise exposures during that time ranged from 103–107 dBA using OSHA criteria and from 111–115 dBA using NIOSH criteria. Because of the high

noise exposures during firearms qualifications, their full-shift noise exposure would also exceed the OELs even if they had no noise exposure during the remainder of the workday. We also sampled the area in the vault with a noise dosimeter because of employee concerns of the noise produced by the electrical box. The noise level collected next to this box during a 7-hour period was 60 dBA by the NIOSH criteria. SLMs were used to measure background levels of noise in the firing range before qualifications with the ventilation system on and no other activities taking place (78.6 dBA) and during the hazardous materials technician's vacuuming activities (79.2 dBA).

One-third octave band noise frequency measurements collected when shooters were in the firing range for qualification are shown in Figure 3. Octave band measurements provide information about the frequency distribution of noise. These measurements showed that the highest sound pressure levels of 110 decibels (dB) occurred at 630 Hertz (Hz), and were greater than 100 dB across all the one-third octave bands from 12.5–31.5 Hz and between 125–4,000 Hz.

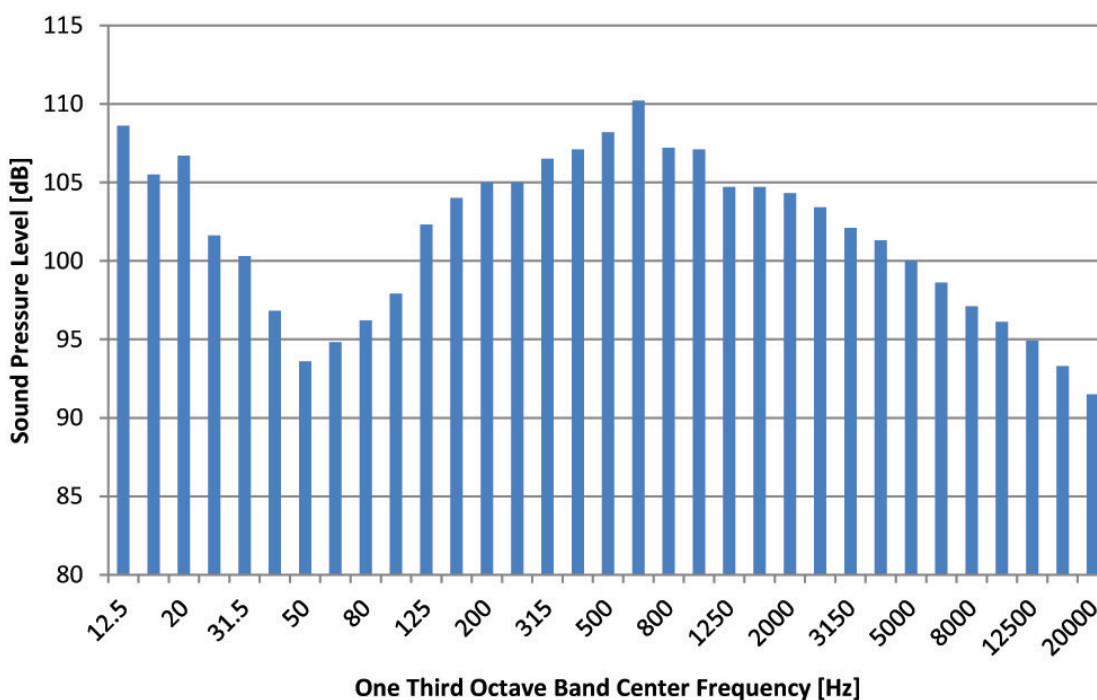


Figure 3. One-third octave band center frequency levels over a 500-second period of shooting.

Peak sound levels ranged from 149.6–154.4 dB during qualification. Shooters typically fired a series of shots in succession followed by several minutes without shooting at which time instructors provided additional guidance or training. An example of peak sound levels during 1 minute of shooting rifles is shown in Figure 4. Four peaks greater than 150 dB and several peaks greater than 140 dB occurred during this time period.

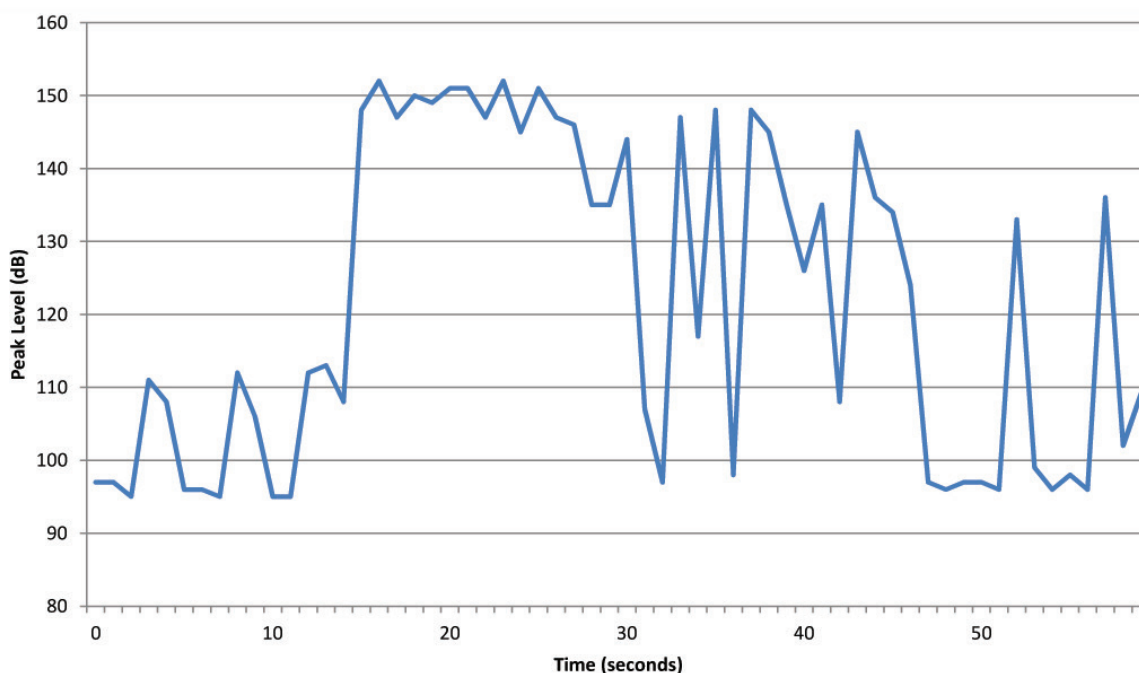


Figure 4. Peak sound levels measured on June 6, 2012, during 1 minute of shooting rifles in the indoor firing range.

Medical Records Evaluation

We reviewed 52 BLLs from 15 instructors and the hazardous materials technician between 2008–2013. Because instructors are detailed to this location for an average of 2 years, seven instructors only had BLLs prior to the installation of the new ventilation system, three had BLLs only after the installation, and five had BLLs before and after the installation. The technician had BLLs before and after the installation as well. Thirty-nine BLLs were taken before the installation of the new ventilation system. Fifteen of the 39 (38%) were below the limit of detection (< 3 micrograms per deciliter [$\mu\text{g}/\text{dL}$]). The remaining 24 ranged from 3–12 $\mu\text{g}/\text{dL}$. The 13 BLLs after the installation of the new ventilation system included 7 (54%) below the limit of detection; the remaining 6 ranged from 3–7 $\mu\text{g}/\text{dL}$.

Other Observations

The hazardous materials technician wore a Tyvek® suit with hood, gloves, and a full facepiece powered air purifying respirator during all cleaning activities that we monitored. The hazardous materials technician had received OSHA lead abatement training and had been fit tested on the respirator. We observed the hazardous materials technician's use of personal protective equipment, including donning and doffing procedures. The hood of his Tyvek suit interfered with the sealing surface of the respirator facepiece during use; he handled contaminated items without gloves; and he cleaned his respirator with a wet towel. We provided recommendations to improve these practices and noted that he had modified his procedures the following day.

Instructors and shooters did not regularly use lead removal wipes or wash their hands before eating, drinking, or smoking during breaks. Shooters and instructors also helped clean spent casings past the firing line, which potentially increases lead contamination of their shoes. Additionally, shooters may increase lead contamination of their clothing when using a prone shooting position with no protection between their clothing and the floor.

Instructors did not regularly wash their work clothing at the range. The washer and dryer were in the men's locker room; therefore, female employees did not have access.

All instructors and most shooters wore double hearing protection, a combination of insert ear plugs and earmuffs. Most instructors wore the 3M Peltor™ Optime™ 105 earmuffs with a noise reduction rating of 30 dB. Some instructors and shooters provided their own earmuffs. Formable foam insert earplugs (Howard Leight Laser Lite®) with a noise reduction rating of 32 dB were placed in locations easily accessible to instructors and shooters, such as a counter in the hallway leading to the firing range and on the tower table in the firing range.

Discussion

Lead

All instructors had full-shift airborne lead exposures less than 8% of the NIOSH REL and OSHA PEL. The average airborne lead concentration for instructors was 1.9 µg/m³, compared to 10.3 µg/m³ in our previous evaluation [NIOSH 2011]. We found a twentyfold reduction in average airborne lead exposures for shooters during qualifications and firearms cleaning. The average airborne lead concentration for shooters was 5.0 µg/m³, compared to 102 µg/m³ in the previous evaluation. We attribute these substantial reductions in instructors' and shooters' airborne lead exposures to installation of the new ventilation system because they spent approximately the same amount of time in the range performing qualifications as they did during the initial visit.

We more fully characterized the hazardous materials technician's lead exposure during this evaluation by collecting task-based and full-shift personal air samples. The higher full-shift concentration (34 µg/m³), which was above the OSHA action level for lead, occurred on the day the technician cleaned behind the bullet trap for more than half an hour. However, these results were substantially lower than the 670 µg/m³ full-shift concentration that we measured earlier [NIOSH 2011]. Job tasks for the hazardous materials technician were basically the same with the exception of changing filters inside the firing range. The airborne lead concentration while HEPA vacuuming behind the bullet trap was more than 6 times greater than the NIOSH REL and OSHA PEL; the exposure during this task was the primary reason the hazardous materials technician's full-shift exposure exceeded the OSHA action level for lead. It is unclear how the high lead exposure during cleaning behind the bullet trap was occurring. In a conversation with the firearms coordinator after the site visit, we learned that since the installation of the new ventilation system the hazardous materials technician no longer needed to clean behind the bullet trap. The range managers were considering permanently sealing the door to that area.

The area airborne lead concentrations in administrative areas outside of the firing range were below the limit of detection ($< 0.09 \mu\text{g}/\text{m}^3$). Area airborne lead concentrations in the range and where firearms were cleaned or stored were detectable but low, similar to the results during our initial evaluation [NIOSH 2011].

BLLs were similar before and after the installation of the ventilation system, despite large reductions in airborne lead concentrations. This finding suggests that ingestion or dermal absorption of lead is contributing to the BLLs, although other sources (including mobilization of bone lead or sources of exposure outside the workplace) could also be a factor. We detected lead in 92% of samples from surfaces around the complex. The concentrations varied substantially but were similar to those found in our initial evaluation. We observed shooters and instructors eating and drinking in the firearms cleaning area and the classroom. Additionally, we observed instructors using smokeless tobacco and chewing gum in the firing range. These activities increase the potential for lead ingestion. The floor of the hazardous materials technician's office was carpeted, and several areas in the complex had rugs and mats. Carpets and rugs could accumulate lead and increase opportunities for contaminating shoes and clothing. The firing range contracted companies to clean offices and bathrooms, change out rugs, and wax floors; however, more frequent use of lead removal cleaner on commonly touched surfaces should reduce the amount of lead contamination. A yearly cleaning of the entire complex would help reduce the amount of lead that may have accumulated on static surfaces.

Occupational health and safety government agencies or national organizations have not established surface contamination limits for lead. However, OSHA specifies in its substance-specific standard for lead that all surfaces be maintained "as free as practicable of accumulations of lead" [29 CFR 1910.1025(h)(1)].

We found lead on the hands, pants, and shoes of most instructors, shooters, and the hazardous materials technician. This lead migrates outside of the range into the rest of the complex and into personal and work vehicles. We detected lead in all of the vehicles sampled. Lead in personal vehicles poses a potential exposure hazard to others who may ride in those vehicles. Lead in vehicles can also be tracked into the home where it can expose others. The best way to reduce the risk from take-home lead exposures is to prevent the spread of lead contamination to areas outside the range.

Ventilation

In 2009, NIOSH issued recommendations on occupational exposure to lead and noise in firing ranges [NIOSH 2009]. The new ventilation design in the range meets the NIOSH recommendations by providing a recommended minimum airflow of 50 feet per minute along the firing line and a recommended downrange minimum airflow of at least 30 feet per minute. NIOSH has also recommended an optimal airflow across firing lines in indoor firing ranges of 75 feet per minute [NIOSH 1975]. Although some of the ventilation measurements we collected at the firing line were above 75 feet per minute, all of our air sample results were less than 20% of the most conservative OELs. This finding suggests that the current

ventilation design is controlling airborne lead exposures for instructors and shooters. Also, as recommended by NIOSH, the range was maintained under negative pressure relative to the adjacent firearms cleaning area. However, because of the fire suppression system we were unable to perform a smoke test in the range to determine if the air flow was distributed evenly, floor to ceiling and wall to wall.

Noise

Repeated exposure to impulse noise can result in permanent noise-induced hearing loss [Patterson and Hamernik 1992; Pekkarinen et al. 1993; Chan et al. 2001]. Impulsive noise, such as that from gunfire, has sufficient intensity to permanently damage unprotected ears in a very short period of time; damage can occur in minutes rather than the days or years typical of industrial noise exposure. The OSHA PEL and NIOSH REL state that exposure to impulse noise should not exceed 140 dB. However, peak impulse is not the sole factor in hearing damage. Other factors such as duration of the impulse and frequency of exposure also have an effect on hearing loss. Also, measuring high intensity impulsive noise, such as gunfire noise, with dosimeters may underrepresent noise exposure and hearing loss risk [Kardous et al. 2003; Kardous and Willson 2004].

Because of the high intensity noise levels in firing ranges, double hearing protection is necessary [Berger 1983]. Proper insertion of hearing protection is critically important to ensure sufficient noise attenuation. NIOSH has found that poor insertion of formable hearing protection into the ear canals reduces the ability of the hearing protectors to attenuate noise exposure [NIOSH 2005].

Octave band analysis allows for determination of the dominant noise frequencies and can be useful for identifying potential engineering controls. One of the primary sources of noise generated during firearms use is the muzzle blast during firing, which generates high noise across the mid to high frequency range. The only effective method to substantially reduce shooters' or instructors' noise exposure from gunfire is using noise suppressors attached to the end of the gun barrel.

Ototoxins

Ototoxins are chemicals that can cause hearing damage when absorbed into the body. Studies have shown that exposure to some chemicals, such as lead and some solvents, can cause hearing loss [Sliwinska-Kowalska et al. 2004; Hwang et al. 2009].

During our evaluation of medical records, we determined that audiometry and blood lead testing were done sporadically. The American Conference of Governmental Industrial Hygienists (ACGIH) states that "in settings where there may be exposures to noise and to carbon monoxide, lead, manganese, styrene, toluene, or xylene, periodic audiograms are advised and should be carefully reviewed" [ACGIH 2013]. The U.S. Army recommends annual audiometric monitoring when workers are exposed to air concentrations that are at or exceed 50% of the most stringent OEL for a variety of ototoxicants including solvents and

lead [U.S. Army 2009]. The highest projected 8-hour TWA personal air concentration for lead among instructors ($3.8 \mu\text{g}/\text{m}^3$) did not exceed 50% of the NIOSH REL; however, reviewers of employees' audiometric tests should consider possible additive, potentiating, or synergistic effects between noise exposure and lead when evaluating audiograms.

Conclusions

The installation of a new ventilation system at the indoor firing range improved the airflow along the firing line and downrange. This change resulted in large reductions in average airborne lead exposure for instructors and shooters. Instructor BLLs remained virtually unchanged from the time of the first site visit but were below $10 \mu\text{g}/\text{dL}$. We found lead on surfaces in the complex; in work and personal vehicles; and on hands, clothes, and shoes of instructors. We also observed eating and drinking in the firearms cleaning area, and employees using smokeless tobacco in the firing range. These practices and the presence of lead on surfaces may be contributing to on-going lead exposure. We found very high airborne lead levels when the hazardous materials technician cleaned behind the bullet trap. Additionally, all instructors' noise exposures exceeded OELs.

Recommendations

On the basis of our findings, we recommend the actions listed below. We encourage the firing range to use a labor-management health and safety committee or working group to discuss our recommendations and develop an action plan. Those involved in the work can best set priorities and assess the feasibility of our recommendations for the specific situation at the firing range.

Our recommendations are based on an approach known as the hierarchy of controls (Appendix B). This approach groups actions by their likely effectiveness in reducing or removing hazards. In most cases, the preferred approach is to eliminate hazardous materials or processes and install engineering controls to reduce exposure or shield employees. Until such controls are in place, or if they are not effective or feasible, administrative measures and personal protective equipment may be needed.

Elimination and Substitution

Eliminating or substituting hazardous processes or materials reduces hazards and protects employees more effectively than other approaches. Prevention through design, considering elimination or substitution when designing or developing a project, reduces the need for additional controls in the future.

1. Stop dry sweeping in the range.
2. Stop cleaning behind the bullet trap. The redesign of the ventilation system makes this cleaning unnecessary.
3. Use nonlead bullets and nonlead primers as they become economically feasible.

Engineering Controls

Engineering controls reduce employees' exposures by removing the hazard from the process or by placing a barrier between the hazard and the employee. Engineering controls protect employees effectively without placing primary responsibility of implementation on the employee.

1. Routinely test and balance the ventilation system to ensure that airflow is within the recommended ranges along the firing line (50–75 feet per minute) and downrange (35 feet per minute).
2. Sample the air for lead if changes are made to the ventilation system or administrative practices that affect lead exposures change.

Administrative Controls

The term administrative controls refers to employer-dictated work practices and policies to reduce or prevent hazardous exposures. Their effectiveness depends on employer commitment and employee acceptance. Regular monitoring and reinforcement are necessary to ensure that policies and procedures are followed consistently.

1. Prohibit eating, drinking, gum chewing, or tobacco use in the range, firearms cleaning, and classroom areas. Post signs on the door to the range stating this policy.
2. Provide shooters a sheet of paper or other disposable material to place on the ground beneath them when they kneel or shoot from a prone position.
3. Stop instructors and shooters from removing spent casings past the firing line. All casings past the firing line should be removed by the hazardous materials technician during cleaning.
4. Prevent the transfer of lead from the range to other work areas and vehicles.
 - a. Provide instructors and the hazardous materials technician with lockers for storing street clothes and shoes separately from lead-contaminated work clothes and shoes.
 - b. Provide coveralls for instructors to wear over their work uniform when they go into the range as an extra measure to prevent lead contamination on clothing. The coveralls should be removed and left at the entrance to the range before breaks or lunch. Provide a uniform for the hazardous materials technician to wear under the Tyvek suit. At the end of the day, the uniforms and coveralls should be left at work to be laundered. Anyone handling these dirty items should follow the same controls as those who work in the range.
 - c. Require instructors and the hazardous materials technician to leave shoes worn on the firing range at the complex. Additionally, all personnel should wear disposable shoe covers before entering the range and then discard them before leaving the complex.

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- d. Make sure all personnel entering the range thoroughly wash their hands and faces before breaks, lunch, and departing at the end of the day. We recommend the use of lead removal wipes at the range exit and lead removal soap in the restrooms.
 - e. Instruct the instructors and hazardous materials technician to shower at the end of the work day and put on their clean personal clothes and shoes before leaving the complex.
5. Clean all personal and work vehicles using HEPA vacuums on porous surfaces and wet wiping on nonporous surfaces. The American Industrial Hygiene Association maintains a list of lead abatement consultants in California: <https://webportal.aiha.org/Custom/ConsultantsSearch.aspx>.
 6. Remove carpet in the simulation room adjacent to the range. Also remove carpeted and antifatigue mats because they may be accumulating lead.
 7. Improve general housekeeping practices to remove lead from all surfaces. Use a HEPA vacuum on porous surfaces and wet wipe nonporous surfaces. Clean tables in the range after each qualification, and clean classroom tables daily. Sample surfaces that employees regularly contact using NIOSH Method 9100 [NMAM 2013] to ensure that the surfaces are “free as practicable of accumulations of lead” according to the OSHA lead standard [29 CFR 1910.1025(h)(1)].
 8. Provide educational materials and prevention information about the health effects of exposure to lead and noise to all personnel on an annual basis. Include information about the risks of take-home exposure.
 9. Perform medical surveillance for lead on instructors and the hazardous materials technician according to the expert guidelines outlined in Appendix B. Reviewers of audiograms should consider the effects of ototoxins, such as lead, on hearing loss.

Personal Protective Equipment

Personal protective equipment is the least effective means for controlling hazardous exposures. Proper use of personal protective equipment requires a comprehensive program and a high level of employee involvement and commitment. The right personal protective equipment must be chosen for each hazard. Supporting programs such as training, change-out schedules, and medical assessment may be needed. Personal protective equipment should not be the sole method for controlling hazardous exposures. Rather, personal protective equipment should be used until effective engineering and administrative controls are in place.

1. Continue wearing dual hearing protection (ear plugs and earmuffs) during weapons firing. For maximum protection, select earmuffs and ear plugs that provide a high level of noise attenuation. Because of the critical importance of proper use and fit, train shooters and instructors how to properly wear hearing protection.
2. Use a chemical protective glove such as nitrile for skin protection when cleaning firearms. Instructors should provide specific guidance to shooters about proper and appropriate use of skin protection.

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3. Ensure that the hazardous materials technician wears a respirator with the sealing surface positioned directly against the skin to ensure a good face-to-facepiece seal.
 4. Instruct the hazardous materials technician to wear chemical protective gloves and keep those gloves on until the contaminated Tyvek suit is discarded and the respirator removed. Use lead removal wipes to clean the respirator.