

Facilities Engineering

Guidelines and Procedures for Rehabilitation and
Conversion of Indoor Firing Ranges

By Order of the Secretaries of the Army and the Air Force:

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Summary. This pamphlet prescribes policy for rehabilitation and conversion of National Guard Indoor Firing Ranges (IFR).

Applicability. This guidance applies to all persons responsible for the operation of National Guard IFRs. As no regulation/guidance can foresee all situations that might arise, the following is written in a broad scope and is intended to be interpreted so as to ensure compliance with all applicable Federal and State laws and regulations.

Proponent and exception authority. The proponent of this regulation is Chief, NGB-SG-IH. The proponent has the authority to approve exceptions to this regulation that are consistent with controlling law and regulation.

Suggested Improvements. Users of this pamphlet are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) directly to NGB-SG-IH, 1411 Jefferson Davis Highway, Arlington, VA 22202-3231.

Distribution. A.

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Glossary

1-1. Purpose

This pamphlet establishes the policy and procedures for rehabilitation and conversion, of National Guard IFRs.

1-2. References

Required and related publications and referenced and prescribed forms are listed in Appendix A.

1-3. Explanation of abbreviations and terms

Abbreviations and special terms used in this publication are listed in the glossary.

1-4. Policy and Procedures

Indoor firing ranges can be safely rehabilitated or converted for other uses, such as a storage area, classrooms or office space, provided the following –

a. Prior to conversion active ranges must be thoroughly decontaminated and cleaned to acceptable levels. *All ranges converted prior to the publication date of this pamphlet, must be inspected and evaluated to determine lead contamination.* This will be accomplished by a certified National Guard Industrial Hygienist (IH) or a person certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs.

b. The level of cleanliness is to be determined by sampling. The Occupational Safety and Health Administration's (OSHA) Technical Manual, 5th Edition, provides guidance on the methods and techniques needed to collect wipe samples (Appendix B).

(1) Wipe samples must be collected and analyzed prior to and after cleaning.

(2) Post-cleaning surface wipe sample results must be less than 200 micrograms per square foot (ug/ft²) (40 micrograms in the case of child exposure). The sampling strategy, which is the amount and location of wipe samples to be collected, is provided in Appendix C.

c. Equipment/Items previously stored in the range must be decontaminated and cleaned to acceptable levels as determined by a person certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs.

(1) Samples must be collected from equipment/items stored in the range. Sample selection is critical, because the number of items stored, length of storage, and level of contamination differs from range to range. The amount and location of the samples should be representative of the areas where lead dust is most likely to accumulate. The more samples collected, the better the statistical comparison of the results.

(2) Samples must be collected from the smooth surfaces of the equipment/items, as much as possible. Results of samples collected from a rough surface will be inaccurate due to the minimal surface contact of the media. Further, the likelihood of tearing the media filter is greater on rough surfaces.

(3) Samples should also be collected on items stored the longest period of time, and which have not been disturbed. Items stored closest to the bullet trap and firing line are likely to have higher concentrations of lead dust.

1-5. Goal

To ensure that every IFR is free of lead dust which means to test less than 200 micrograms and to reduce the number of unsafe National Guard IFRs.

1-6. Deviation

Deviations from this guidance will require a written exception to policy from your Regional Industrial Hygiene Office. Questions and/or comments regarding this subject should be directed to your Regional Industrial Hygiene Office or Chief, National Guard Bureau, Office of the Joint Surgeon, ATTN: NGB-SG-IH, 1411 Jefferson Davis Highway, Arlington, VA 22202-3231.

Chapter 2**Health and Medical Aspects****2-1. Health Effects**

29 Code of Federal Regulations (CFR) 1910.1025, Appendix A, identifies lead as a highly toxic metal. Elemental lead is indestructible, and common in the environment. Lead can enter the body by inhalation (breathing) or

ingestion (eating). In addition, lead is a cumulative poison. It accumulates in the blood, bones, and organs, including the kidneys, brain and liver. Effects include nervous and reproductive system disorders, delays in neurological and physical development, cognitive and behavioral changes, and hypertension. Symptoms include loss of appetite, difficulty sleeping, irritability, fatigue, headache, and inability to concentrate. It can stay in the bones for decades. Worker awareness and training are important to ensure that employees can recognize the symptoms of exposure and get prompt medical attention.

2-2. Medical Surveillance for Occupational Exposure to Lead (Pb)

a. Per 29 CFR 1910.1025 (j)(i-ii), Medical Surveillance - General, "The employer shall institute a medical surveillance program for all employees who are or may be exposed above the action level for more than 30 days per year. The employer shall assure all medical examinations and procedures are performed by or under the supervision of a licensed physician."

b. The DOD 6055.5-M, Occupational Medical Surveillance Manual - Table 2-1 lists medical surveillance criteria for employees "who are or may be exposed above the action level for 30 days/year."

2-3. Air Monitoring

Worker breathing zone air samples must be collected to ensure that personnel are not overexposed to airborne lead during the cleanup phase. Daily air samples will be collected from all personnel involved in the cleanup operation. These exposure levels will be used to evaluate work practices and medical surveillance requirements.

2-4. Wipe Sampling Protocol and Media

A template measuring 10 centimeters by 10 centimeters square, approximately 4 inches square, should be used to accurately measure and mark the area before collecting wipe samples. Samples should be staggered to different areas of the range. A grid system should be utilized. Samples should not be collected all on one section of a wall, or end of the building. OSHA Technical Manual provides the necessary guidance on the technique needed to collect wipe samples (Appendix B). Only distilled or deionized water will be used to saturate dry sample media. At least one field blank must be submitted with every 10 samples. The field blank must be from the same lot, and labeled as a blank.

2-5. Personal Protective Equipment

29 CFR 1910.1025 (f) (2), for housekeeping and rehabilitation the employer shall select respirators from among those approved for protection against dust, fume, and mist by the National Institute for Occupational Safety and Health (NIOSH), under the provision of 42 CFR part 84. The employer shall institute a respiratory protection program in accordance with 29 CFR 1910.134 (b), (d), (e) and (f). As a minimum, personnel conducting the decontamination of the range will be provided with the following personal protective equipment.

a. Under 29 CFR 1910.1025 (g). For employees engaged in range rehabilitation and/or range conversion, the employer shall provide at no cost to the employee, and ensure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:

- (1) Protective coveralls with hood and shoe covers or disposable Tyvek™ full body suit.
- (2) Disposable rubber gloves; and disposable shoe coverlets (If necessary).
- (3) Full-face air purifying respirator with P-100 cartridges.

b. The employer shall provide the clothing required in a clean and dry condition at least daily to employees engaged in the conversion of IFRs.

c. The employer shall provide for the cleaning, laundering, or disposal of used or contaminated protective clothing and equipment.

d. The employer shall assure that all protective clothing is removed at the completion of a work shift only in areas designated for that purpose (Change Areas or Change Rooms).

e. The employer will ensure that contaminated protective clothing that is to be cleaned, laundered, or disposed of, is placed in a closed container in the change area that seals sufficiently enough to prevent dispersion of lead dust.

f. The employer will further inform in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of exposure to lead.

g. The employer will ensure that the containers of contaminated protective clothing and equipment are labeled as follows: **CAUTION: CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.**

Chapter 3 Education, Maintenance, Cleaning and Conversion

3-1. Worker Education

a. 29 CFR 1910.1025, Appendix B, requires an information and training program for all employees exposed to lead above the action level or who may suffer skin or eye irritation from lead. The program must inform the employees of the specific hazards associated with their work environment, protective measures which can be taken, the danger of lead to their bodies (including their reproductive systems), and their rights under the standard. In addition you must make readily available to all employees, including those exposed below the action level, a copy of this standard and its appendices. This training program will be repeated annually for personnel in range cleanup operations.

b. The commander/supervisor will ensure that each soldier or Army National Guard (ARNG) employee is informed of the following:

- (1) The content of the standard and its appendices.
- (2) The specific nature of operations that could result in exposure to lead above the action level.
- (3) The purpose, proper selection, fitting, use and limitations of respirators.
- (4) The purpose and a description of medical surveillance program.
- (5) Eating and drinking are prohibited in lead contaminated areas.
- (6) Smoking and smoking materials will not be permitted in contaminated areas.
- (7) Soldiers and ARNG employees must wash their hands and other exposed skin whenever they leave the work area.
- (8) The engineering controls and work practices associated with the individual's job assignment.
- (9) The contents of any compliance plan in effect.
- (10) Instructions to soldiers and ARNG employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.

3-2. Range Cleaning Instructions

a. Written procedures, such as a scope of work, or standing operating procedure that complies with all Federal, State and local regulations must be established prior to decontamination operations.

b. The range ventilation system will be in operation during range cleaning to ensure that a negative pressure environment is maintained. In the absence of mechanical ventilation system, all doors and windows will be sealed to eliminate fugitive emissions.

c. A High Efficiency Particulate Air (HEPA) filtered vacuum system, which is designed to collect loose surface lead dust particles, is the preferred method of cleanup. If a HEPA filtered vacuum is not available, the range can be cleaned using a wet method.

d. Prohibited methods include:

(1) Wet cleaning using high-pressure systems, since this method may embed the lead into the substratum and generate large quantities of hazardous waste.

(2) Dry sweeping is not permitted.

e. All surface areas of the range must be cleaned. In addition, areas outside of the IFR where lead can be tracked must be cleaned.

f. The preferred progression of cleaning is from top to bottom and from behind the steel bullet trap to the firing line.

(1) Clean the steel bullet trap, areas in front of and behind the bullet trap, and the steel bullet trap plate(s), after removing the sand (if applicable).

(2) Clean the ceiling, floors, lights, baffles, retrieval system, heating system(s), and ventilation duct(s).

(3) Vacuum and remove acoustical material. *Painting over this material is not recommended.*

(4) Clean the floor the last, starting at the bullet trap and ending behind the firing line.

g. When using a HEPA filtered vacuum, vacuum all surface areas until no dust or residue is visible.

h. Any general purpose cleaning solutions can be used for the wet method. However, Spic and Span™ has been found to be an effective cleaning solution by other Army organizations. Mix new solutions of cleaning solution frequently. Wet wiping will require dual containers of water; one container for wetting the applicator (mops, rags, sponge, etc.) and the other container for rinsing the applicator after the dust has been wiped from the surfaces. After wet wiping all surfaces, permit the area to dry.

i. *Properly dispose of all hazardous waste. Do not place lead contaminated waste into the sewer system or onto the ground.*

(1) When placed in containers, wastewater should be left to evaporate.

(2) Mop-heads, sponges and rags will be discarded as hazardous waste following cleanup.

j. A thorough visual inspection to detect dust should be made following cleanup and prior to collecting post surface wipe samples.

k. Wood floors should receive a coat of deck enamel or urethane; concrete floors should be sealed with deck enamel.

l. As a variety of conditions exist in ranges, unique situation may arise and specific written guidance from your Regional Industrial Hygiene Office may be required.

m. Any cleaning activities must be under the supervision by a trained and competent personnel IAW with OSHA and other nationally accepted standards and the work shall be according to current industry engineering standards under the control of the State Construction and Facilities Management Officer. Cleaning must recognize that there likely will be "background" lead presence in the readiness center totally independent of the existence of an indoor range and that the method of cleaning is less important than achieving the goal of less than 200 micrograms (40 micrograms in the case of child exposure).

3-3. Cleaning Stored Contaminated Equipment

a. Equipment contaminated (sample result is higher than 200 ug/ft²) with lead dust must be decontaminated before it is removed from the range.

b. Equipment located near the bullet trap and firing line should be cleaned first and then removed. The cleaning method depends on the size of the equipment and the material it is comprised of, i.e. metal, wood, concrete, porous, non-porous, smooth or rough finish etc. However, either HEPA vacuum or the wet wipe method will be used. Refer to paragraph 3-2 for additional guidance.

c. Every attempt should be made to clean and reclaim items since disposing of equipment, as hazardous waste is costly and wasteful. Only as a last resort will the item be discarded as hazardous waste. Porous items, such as office partitions and carpet that were present during firing should be considered grossly contaminated and be discarded unless analysis proves otherwise. Consult your State Environmental Office for the proper hazardous waste disposal methods.

3-4. Contaminated Sand and Lead Waste

Consult your State Environmental Office for specific disposal guidance to ensure compliance with local laws and regulations.

3-5. Range Rehabilitation

This chapter applies to all IFRs that have been identified as candidates for rehabilitation. It provides further guidance for cleaning and/or sampling that might be required prior to the start of rehabilitation.

a. The portion(s) of the range to under go rehabilitation must be sampled to determine the level of lead contamination. Wipe samples will be taken per the established sampling protocol. See Appendix B.

b. All personnel involved in range rehabilitation will wear a NIOSH approved respirator (P-100) and proper personal protective equipment as prescribed in paragraph 2-5 above.

c. Prior to the start of rehabilitation, the environmental office must be notified to determine the disposition of any debris containing hazardous materials (lead).

d. Supervision shall be by a person who is certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs. All work shall be according to current industry engineering standards under the control of the State Construction and Facilities Management Officer.

3-6. Conversion of Indoor Firing Ranges

Prior to the start of decontamination, employers must ensure that all procedures to be used comply with Federal, State, and local regulations. To ensure that all lead contamination is eradicated, the following procedure is established.

a. The State shall follow the project approval process as delineated in NGR 420-10 (or NGR 415-5 if the use of the military construction appropriation is required).

b. All ranges slated for conversion will be inspected and evaluated by the NGB Regional Industrial Hygiene Office.

- c. All equipment stored in the range, if applicable, prior to the start of decontamination must be sampled, decontaminated, re-sampled and removed or turned in as lead contaminated material.
- d. All acoustical tiles and/or sound proofing material (if applicable) must be removed and turned in as lead contaminated material through the environmental office.
- e. The bullet trap, target retrieval system and firing line stations must be removed and turned in as lead containing material through the environmental office.
- f. Light fixtures and ventilation system grills must be removed and decontaminated.
- g. Ventilation system ducts need to be decontaminated or removed and replaced.
- h. The exhaust fans and/or the complete ventilation air-handling unit (if applicable) must be decontaminated or removed to include roof fans.
- i. Cover all openings of any component previously decontaminated prior to start of interior decontamination of the firing range.
- j. Prior to start of washing, the interior of the range should be vacuumed with a HEPA filtered vacuum. The range should be washed using a cleaning solution of hot water and Spic and Span in five gallons of hot water. A progression of cleaning from top to bottom, and from back to front should be used. All surface areas of the range must be cleaned. Mix new solutions of water frequently. Washing will require dual containers of water; one container for wetting the applicators (mops, rags, sponges, etc.), and the other container for rinsing the applicators. Waste water placed into containers can be left to evaporate. *Properly dispose of all hazardous waste and do not place any lead contaminated waste into the sewer system or onto the ground.* Mop heads, sponges and rags will be discarded as hazardous waste following decontamination of the range. After completion of decontamination, and prior to taking clearance samples, the ventilation system must be run for a period of 36 hours. Wipe clearance samples will be taken from ceiling, walls and floors. The range will be considered clean if no clearance sample is greater than 200 ug/ft², if any sample is above 200 ug/ft², the range is not considered clean, the range will need to be re-washed until clearance samples are below 200 ug/ft².
- k. The regional industrial hygienist will do quality assurance sampling as needed.
- l. After obtaining clearance, the walls of the range will be coated with a sealant (Not Paint), which is smooth, wood floors will receive a coat of deck enamel or urethane, concrete floors will be sealed with deck enamel. After sealing, floors will be tiled or covered with linoleum.
- m. As a variety of conditions exist in ranges, unique situations may arise and specific written guidance from the Regional Industrial Hygiene Office may be required.
- n. All personnel involved in the decontamination/conversion of IFRs as a minimum will be provided with the following personal protective equipment.
 - (1). Full Face air purifying respirator with HEPA cartridges. The requirements outline in 29 CFR 1910.134, must be met prior to placing workers in respiratory protection.
 - (2). Individuals will be provided personal protective equipment as required per paragraph 2-5, this pamphlet.
- o. Any conversion must be supervised by a person certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs. All work shall be according to current industry engineering standards under the control of the State Construction and Facilities Management Officer. Cleaning must recognize that there likely will be "background" lead presence in the readiness center totally independent of the existence of an indoor range and that the method of cleaning is less important than achieving the goal of less than 200 micrograms (40 micrograms in the case of child exposure).
- p. After conversion, lead testing shall continue on an annual basis to verify that no lead migration from the substrate is occurring.

**Appendix A
References**

**Section I
Required Publications**

There are no entries in this section

**Section II
Related Publications**

ASTM E1792-03

Standard Specification for Wipe Sampling Materials for Lead in Surface Dust

AR 11-34

The Respiratory Protection Program

AR 40-5

Preventive Medicine

DODI 6055.5

Industrial Hygiene and Occupational Health

DOD 6055.5-M

Occupational Medical Surveillance Manual

29 CFR, Part 1910

Occupational Safety and Health Administration, Department of Labor

National Institute for Occupational Safety and Health (NIOSH) 76-130

Lead Exposure and Design Considerations for Indoor Firing Ranges, Department of Health, Education and Welfare

NGR 385-15

Policy and Responsibilities for Inspection, Evaluation and Operation Army National Guard National Guard Indoor Firing Ranges (IFRs).

NGR 415-5

Army National Guard Military Construction Program Development and Execution

NGR 420-10

Construction and Facilities Management Office Operations

Technical Manual, 5th Edition

Occupational Safety and Health Administration, Department of Labor

**Section III
Prescribed Forms**

There are no entries in this section

Section IV
Referenced Forms

There are no entries in this section

Appendix B
Protocol for Collecting Wipe Samples

B-1. If multiple samples are to be collected at the work site, prepare a rough sketch of the area(s) or room(s), which are to be wipe sampled.

B-2. A new set of clean, impervious gloves should be used for each sample to avoid contamination of the media by previous samples and to prevent contact with the substance.

B-3. Wipe Samples

- a. If using Ghost Wipes™, tear open the individually sealed package. Remove the moistened wipe. Unfold the wipe.
- b. If using a dry media such as MCE or Whatman™ filter, moisten the filter with distilled or deionized water prior to sampling.

B-4. Place a 10 centimeter by 10 centimeter template on the area to be wiped.

B-5. Apply uniform firm pressure while wiping the area inside the template.

B-6. To ensure that all portions of the partitioned area are wiped, start at the outside edge and progress toward the center making concentric squares decreasing in size.

B-7. After collecting a sample, fold the filter or wipe inward and place into a container and number it. Note the number at the sample location on the sketch.

B-8. At least one blank filter treated in the same fashion but without wiping, should be submitted to the laboratory.

Appendix C
Sampling Strategy for Collection of Wipe Samples

C-1. Prior to cleaning the ranges, three samples must be collected and analyzed for total lead dust on each surface, i.e., floor, ceiling, bullet trap, and wall to include the plenum wall, if applicable. In addition, a total of three samples should be collected from areas which have been least disturbed by airflow. Established walkways should be avoided.

C-2. Samples should be collected from different areas of the range. A grid system should be utilized. Each range surface areas should be divided evenly into 3 by 3 sections. Samples should not be collected from only one section of a wall or end of the building.

Glossary

Section I

Abbreviations

ARNG

Army National Guard

CFR

Code of Federal Regulations

HEPA

High Efficiency Particulate Air

IFR

Indoor Firing Range

NIOSH

National Institute for Occupational Safety and Health

OSHA

Occupational Safety and Health Administration

ug/ft²

Micrograms per square foot

Section II

Terms

Air monitoring

The sampling for and measuring of pollutants in the atmosphere.

Breathing zone

The imaginary globe of two feet radius surrounding the head.

General area

Collection of and later analysis of airborne contaminants in a given work environment. As the sampling pump and collection media are not attached to a worker, the concentrations found represent average concentrations in that area but may not representative of the actual exposure of the worker.

HEPA

Refers to high efficiency particulate air filter systems capable of capturing up to 99.97 percent of particles 0.3 microns in size or larger.

Lead-Contaminated Range

It is assumed that all IFRs, which have been fired in, are lead-contaminated.

Respirator

A device designed to provide the wearer with respiratory protection against inhalation of airborne contaminants.

Wipe Sample

The terms wipe, swipe, or smear samples are used synonymously to describe the techniques utilized for assessing lead surface contamination.

Section III
Special Abbreviations and Terms

This section contains no entries