

**Miller, Diane M. (CDC/NIOSH/EID)**

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**From:** Dozois, Mary (DOL) [Mary.Dozois@state.ma.us]  
**Sent:** Thursday, June 26, 2008 3:22 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** 128 - Firing Ranges Alert

June 26, 2008

Docket Number NIOSH-128

**Comments to DRAFT NIOSH Alert: Preventing Occupational Exposures to Lead and Noise at Indoor Firing Ranges.**

**Dear NIOSH:**

Thank you for developing this publication. This agency has assisted municipal police departments handle lead contamination throughout their entire buildings due to an indoor firing range located in the basement.

**Please consider revising the draft document to include:**

- **Picture diagram of sources of Lead in a bullet to include bullet and primer.** Many firing range operators refuse to recognize lead in primer. In addition, some "Lead-free" bullets can still contain Lead primer. Highlight your fact on page 11 that jacketed and non-lead bullets can reduce lead emissions by 80%. See attached "sources of Lead dust" from the Texas Department of Health.
- **Picture diagram of location of Lead Dust contamination in the building.** Floor, counters, coffee maker, duct.
- **Picture diagram of a good ventilation system.**
- **Picture diagram of Lead poisoning.** Include the sperm, this always gets them to listen.
- **Sideline chart of HUD wipe sample clearance standards.**
- **Sideline chart of expected Noise levels in a firing range, for each type of gun.** Show how they are all above the reference number of 85 dB and 140 dB.
- **Tell me about the backstop and maintenance.** The NSSF guide says that poor maintenance has caused most of their poisonings that they have evaluated.

Thank You!








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From the Texas Department of Health:

AIRBORNE LEAD DUST IS CREATED BY:

-  Exploding lead styphnate primers
-  Friction from the lead slug against the gun barrel
-  Lead slugs hitting the bullet trap, walls, floors, or ceiling of the range
-  Spent bullets and settled dust
-  Improper range-cleaning methods disturbing settled dust
-  Poor indoor range ventilation
-  Outdoor weather conditions

