



**On Target
Safety Academy**

WORKPLACE SAFETY & HEALTH ASSISTANCE
FOR THE SHOOTING SPORTS INDUSTRY

TECHNICAL BULLETIN

Firing Range Specific. Practical Solutions. Safer Ranges.

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DID YOU KNOW?

INITIAL AIRBORNE LEAD MONITORING



OSHA requires employers to perform initial airborne lead exposure monitoring whenever employees may be exposed at or above the Action Level.

At shooting ranges, maintenance activities such as bullet bucket transfers, bullet trap cleaning, and ventilation filter changes often generate the highest airborne lead exposures. Representative exposure monitoring, not assumptions, is the foundation for determining OSHA compliance obligations and protecting employees.



WHY IT MATTERS

- Maintenance tasks often generate higher airborne lead levels than live fire.
- Initial exposure monitoring verifies compliance.
- Data determines how much of OSHA's Lead standard applies to your range.
- OSHA targets lead-based industries for inspection.



COMMON MISTAKES

- Sampling one range officer during shooting operations rarely represents every lead-generating task.
- Bullet bucket transfers, bullet trap maintenance, lead reclamation, and filter replacement are often overlooked.
- Assuming state-of-the-art ventilation and/or respirator use eliminates the need for air monitoring.



BEST PRACTICES

- Identify all tasks capable of generating lead dust.
- Conduct representative personal air sampling for each high-risk task.
- Sample during peak production to assess worst-case exposures.
- Repeat monitoring after any change that could increase employee lead exposure (e.g., increased time in the range or more rounds downrange).



FROM OSHA COACH

"During OSHA inspections and industrial hygiene surveys, I frequently found that many firing ranges never conduct the required airborne lead monitoring. Those that do often overlook maintenance activities, where the highest lead exposures typically occur."

Dale Krupinski, CIH, CSP
Owner, AKA OSHA Coach
On Target Safety Academy, LLC



OSHA REFERENCE

29 CFR 1910.1025(d)(2)

Initial determination

Each employer who has a workplace or work operation covered by this standard shall determine if any employee may be exposed to lead at or above the action level.



QUICK COMPLIANCE CHECKLIST

- ✓ Identify all lead-generating tasks.
- ✓ Conduct air sampling under peak production.
- ✓ Notify employees of sampling results.
- ✓ Use data to determine how much of the standard applies to your range operations.
- ✓ Implement engineering and administrative controls to reduce exposures.



LEARN MORE



KEY TAKEAWAY

Exposure monitoring provides the information ranges need to make informed decisions, not just to check a compliance box. Air sampling is required regardless of the ventilation and respiratory protection used. Firing range owners and operators need eyes, ears, and exposure **assessments**.



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