

Dragon, Karen E. (CDC/NIOSH/EID)

From: Geiger, Mark B. CIV (Acquisition Safety) [mark.geiger1@navy.mil]
Sent: Saturday, April 12, 2008 6:27 PM
To: NIOSH Docket Office (CDC)
Subject: 128 - Firing Ranges Alert
Attachments: Review NIOSH firing range guide 4-08.doc

<<Review NIOSH firing range guide 4-08.doc>>

Dear Sirs,

I reviewed the NIOSH alert guidance on indoor firing ranges with some interest. It is very well researched and should be valuable to the many smaller ranges without good access to occupational safety and health professionals.

I've made a few comments for your consideration. Please note that these comments cannot be considered "official" Navy positions, but just my professional input. I will also forward to colleagues.

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Notes on NIOSH Guide to Indoor Firing Ranges

NIOSH Alert: Preventing Occupational Exposures to Lead and Noise at Indoor Firing Ranges, NIOSH Docket Number NIOSH-128. <http://www.cdc.gov/niosh/review/public/128/> Comments due June 30, 2008

Reviewer (organization and contact information)	Page	Para	Section Subject-Title	Observation	Recommendation remarks
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	2	3	Engineering and administrative controls	Does not include a recommendation for hand-washing and shower facilities	Add recommendation: Facilities should be equipped with hand washing facilities and their use made mandatory after shooting.
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	5-6		ACGIH limits	Description of solvent and noise exposure risks doesn't describe the relevance of this issue to firing ranges	
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	10		Sound attenuation by protective equipment	The sound attenuation evaluation described was conducted on manikins and represents idea conditions. Actual sound level attenuation by field users is markedly less.	Describe the limitations of PPE in "real world" settings and include more information on proper fitting, care de-rating of protective equipment per OSHA, NIOSH and other guidelines.
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	14		Exhaust ventilation	Discussion of distribution and velocity of airflow is good.	Consider recommending visualization of airflow via smoke tube (or even soap bubbles.
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	14		Air filtration	Doesn't mention compliance with environmental regulations. Should also discuss potential for use of pre-filters (save money as HEPA	Discuss EPA/CAA regulatory compliance as appropriate. Discuss use of pre-filters.

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				filters are very expensive).	
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	14		Filter maintenance	Doesn't mention design of filters for easy access and safe removal by approaches that minimize dispersion of dust.	Mention these design considerations include space for access to filtration system
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	12- 16		General	Application of "clothesline" target retrieval systems was not discussed.	Discuss of remote target retrieval systems.
Mark Geiger Navy CNO N09FB Mark.Geiger1@navy.mil 703 602-5020	18		Preventing take-home lead exposures	Personal hygiene was discussed along with the need to change clothes. cleaning clothes or manage disposable coveralls.	Recommend also suggesting a washer and drier on-site for laundry. May wish to consider water filtration, if technology is readily available.