



## OSHA Adds Arsenic as a Concern for Indoor Shooting Ranges

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Over the last few years, the Occupational and Health Administration (OSHA) has targeted indoor shooting ranges for potential exposures of employees to lead. During inspections, OSHA compliance officers generally take surficial and airborne samples to determine whether facilities exceed permissible limits. If exposures exceed permissible limits, a multitude of requirements may be triggered under OSHA's lead and respiratory standards. However, based on a recent enforcement action, it appears OSHA may be adding arsenic to its focus on indoor shooting ranges as well.

Arsenic is often found as a component of lead ammunition. Like lead, OSHA's arsenic standard establishes permissible exposure limits for employees. If exposures exceed regulatory thresholds, standards for respiratory protection, medical surveillance and other work practices may be triggered. The standard also requires that surfaces be "as free as practicable" of an accumulation of arsenic. As with the lead standard, this housekeeping requirement is challenging because it is subjective and does not establish a numerical limit.

Many indoor shooting ranges have focused their compliance-related efforts on the lead standard; however, recent events suggest that arsenic should be assessed when evaluating whether employees are exposed above permissible limits. Employers should also revise written programs, training, and housekeeping requirements where appropriate. As OSHA adapts, the shooting range industry must also reassess to ensure its employees are properly protected from recognized hazards.

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