

19 May 1997

Re: NEPA Call-In Technical Inquiry 0080 - Requirements to Close Firing Range

Dear NEPA Call-In User:

This letter is in response to your April 28, 1997 request for further information about remediation of firing ranges. Specifically, you received information from NEPA Call-In on the requirements to close an indoor firing range in Technical Inquiry (TI) 59. The range you will be closing is in the sub-basement of a building and has a dirt floor, and you were wondering if there are official definitions for indoor and outdoor firing ranges. You would also like general information on outdoor firing ranges, and specific information on remediation of soil containing lead.

SUMMARY OF FINDINGS

NEPA Call-In could not identify an official definition of indoor and outdoor firing ranges. As each is governed by the same laws and regulations, an official distinction need not be made. NEPA Call-In is providing "Firing Ranges," an product information packet provided by PRO-ACT, the Air Force environmental information clearinghouse sponsored by Headquarters Air Force Center for Environmental Excellence (AFCEE). The packet includes general information on firing range design and remediation, lead-free ammunition, and lead recyclers. The packet also provides specific information about soil remediation.

DETAILED FINDINGS

NEPA Call-In contacted the Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA) Hotline, (800) 424-9346, for information on the definitions of indoor and outdoor firing ranges. The representative stated there are no definitions in RCRA for indoor or outdoor firing ranges. He suggested we contact the Occupational Safety and Health Administration (OSHA), (202) 219-7162.

We contacted Ms. Janice Green, Health Standards, OSHA, (202) 219-7162, who stated OSHA has no definitions of indoor and outdoor firing ranges.

NEPA Call-In contacted Mr. Randy Lamdin, Environmental Protection Specialist, EPA Region VIII, (303) 312-6350, who stated he has never seen a formal definition of indoor and outdoor firing ranges. However, he stated he considers indoor firing ranges to be areas where the firing point and impact area are in a confined structure where the fired rounds are not subject to the elements. Conversely, an outdoor range is an area where the firing point and impact area are not in a confined structure, and the fired rounds are subject to the elements. If the area is even partially outdoors, Mr. Lamdin would consider it an outdoor range. He suggested we contact the National Rifle Association (NRA), as they may have formal definitions.

We contacted Mr. Steve Brown, Education and Training, NRA, (703) 267-1000. Mr. Brown stated the NRA does not have official definitions of indoor and outdoor firing ranges.

Remediation of outdoor firing ranges is governed by the same guidelines provided to you in TI 59 for indoor firing ranges. NEPA Call-In is

enclosing a Product Information Packet provided by PRO-ACT, the Air Force "full service" environmental information clearinghouse sponsored by AFCEE. Of particular interest are the following:

1. "Report, Field Demonstration of a Sieving and Stabilizing Technology on Lead-contaminated Soil at a Small Arms Range at Mayport Naval Air Station," Battelle and the Naval Civil Engineering Laboratory, February 1991. This study demonstrated and evaluated the effectiveness of a sieving and stabilization process in treating soils;
2. "Draft U.S. EPA Region VIII RCRA Program Policy for Remediation of Rifle and/or Pistol Ranges," Region VIII, EPA, undated. This document provides a step by step procedure for soil remediation. NEPA Call-In provided you the final version of this policy in TI 59. The final version also includes a suggested decision logic for RCRA corrective action;
3. "Environmental Effects of Small Arms Ranges," the Naval Civil Engineering Laboratory, October 1991. This document focuses on contaminant releases from outdoor small arms ranges, and includes information on soil remediation; and
4. "PRO-ACT Fact Sheet, Lead Contamination in Soil at Small Arms Firing Ranges," September 1994. This Fact Sheet provides treatment and disposal options for soil contaminated with lead.

The materials in this TI have been prepared for use by GSA employees and contractors and are made available at this site only to permit the general public to learn more about NEPA. The information is not intended to constitute legal advice or substitute for obtaining legal advice from an attorney licensed in your state and may or may not reflect the most current legal developments. Readers should also be aware that this response is based upon laws, regulations, and policies in place at the time it was prepared and that this response will not be updated to reflect changes to those laws, regulations and policies.

Sincerely,

(Original Signed)

NEPA Call-In Researcher