



**NATIONAL GUARD BUREAU**  
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NGB-ZA

6 December 2016

MEMORANDUM FOR The Adjutants General of all States, Puerto Rico, the US Virgin Islands, Guam, and the Commanding General of the District of Columbia

SUBJECT: Supplemental Guidance to ARNG-CSG Memorandum, Possible Lead Dust Hazard in Army National Guard (ARNG) Readiness Centers

1. References.

a. Office of the Inspector General, Department of Defense, Audit Report Number 99-250, Construction and Rehabilitation of Reserve Components Indoor Small Arms Firing Ranges, September 1999.

b. NG Pam 415-12 (Army National Guard Facility Allowances), 1 June 2011 (current NG Pam 415-12 is dated 25 January 2015).

c. NG PAM 420-15 (Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges), 3 November 2006.

d. Memorandum, ARNG-CSG, 23 September 2015, subject: Supplemental Guidance to ARNG-CSG Memorandum, Possible Lead Dust Hazard in Army National Guard (ARNG) Readiness Centers.

2. Effective immediately, the use of federal weapons or ammunition on firing ranges inside readiness centers is prohibited. All indoor firing ranges (IFR) attached to readiness centers, whether Federally owned or State owned and Federally supported, are to be closed, and community events in readiness centers that require lead remediation are to be discontinued.

3. The functional space allowances for indoor firing ranges in a Readiness Center were deleted effective with the publication of reference 1b in June 2011 when the training community determined that indoor firing ranges do not fulfill Army individual weapons qualification requirements and create significant risks and costs associated with industrial hygiene, human health, environmental, and safety concerns. The closures do not apply to Live Fire Shoot Houses, Modular Small Arms Ranges, or other stand-alone ranges not contained or attached to readiness centers.

4. It is imperative to establish the existence and status of all IFR and initiate remediation of lead contamination. The following tasks must be accomplished:

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a. All IFRs, regardless of classification described in reference 1d (enclosed), will be identified and recorded IAW Section 5, paragraph 4 of that reference. Suspense for identifying and recording IFRs will be 31 January 2017.

b. States are further required to provide additional information into the Real Property inventory database in the Notes and Documents section by creating a note answering the questions below. The suspense for completing the notes is 31 January 2017.

(1) Has Industrial Hygiene testing been accomplished? If yes, list testing date and results of testing.

(2) Has potential IFR hazard been fully mitigated? If no, are engineering controls or procedures in place and posted to mitigate hazard?

(3) Based on Industrial Hygiene analysis is monitoring required? If yes, is monitoring program in place?

c. All active and former IFRs will be cleaned in accordance with reference 1c. The cost of clean-up is considered to be 100 percent Federal share. Initiate clean-up in FY17 as possible with funds distributed to the State. Contaminated IFRs must be left vacant until cleaned. After cleaning, IFRs may be repurposed to meet other facilities requirements. Request that Assistant Adjutant General of each State provide a memorandum to ARNG-I&E certifying range closure and a timeline of when range clean-up will be complete.

d. Submit proposed plans for future use of former IFR space (conversion or left unused) to ARNG Installations and Environment (ARNG-I&E) for appropriate Federal assistance (per established agreement support codes) for the facility. The suspense date for submitting the plan will be 28 February 2017.

5. My point of contact is COL Erik T. Gordon, Chief, Installations and Environmental Directorate, at DSN 327-7901, 703-607-7901, or erik.t.gordon.mil@mail.mil.

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