



Seven Core Elements of Effective Range Health and Safety Programs

**2023 Firearm Industry
Compliance Webinar Series**



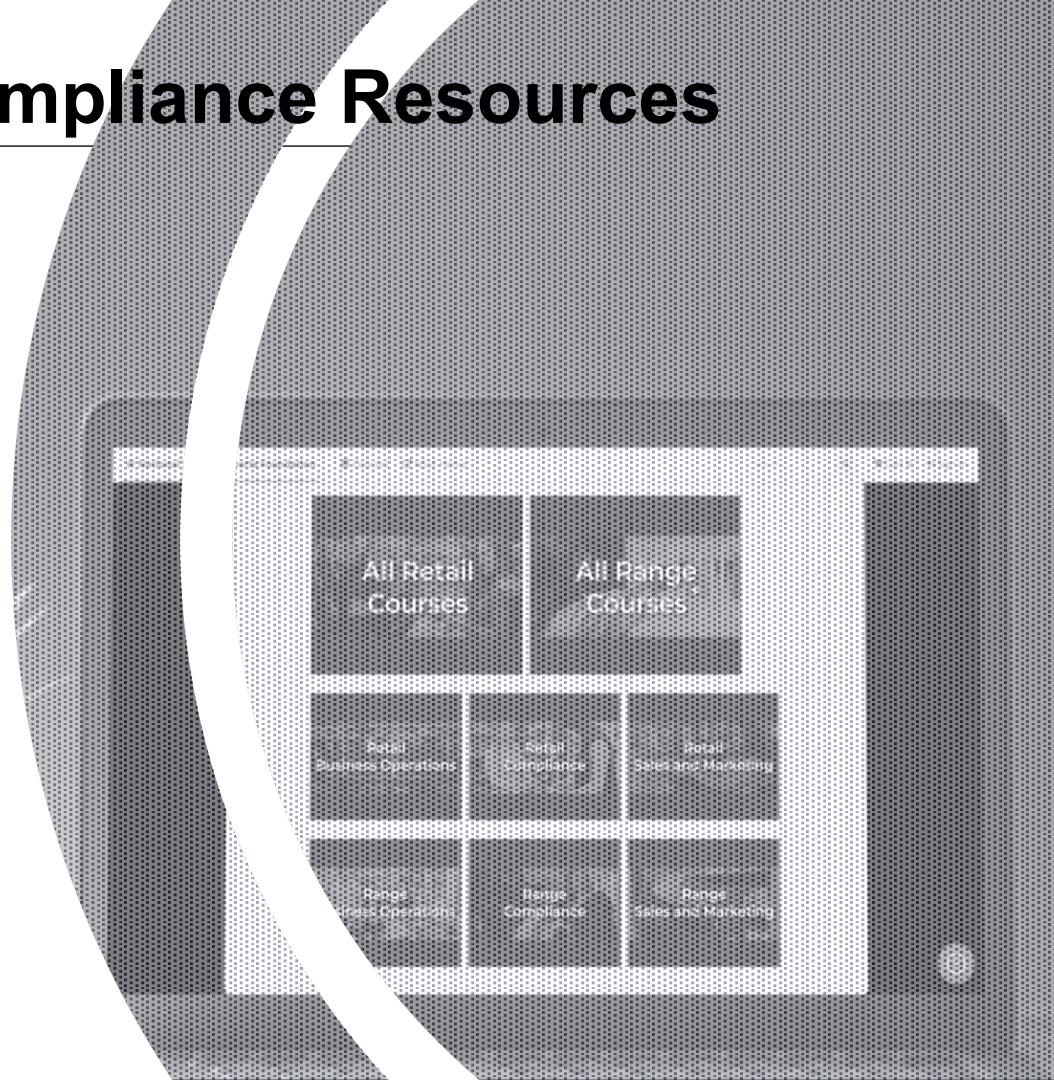
Additional NSSF Compliance Resources



Industry Compliance courses:

- “Zero Tolerance” Policy
- Winning at ATF Inspections
- Completing the Form 4473
- Multiple Sales Report
- and more

[NSSF.org/Education](https://www.nssf.org/education)

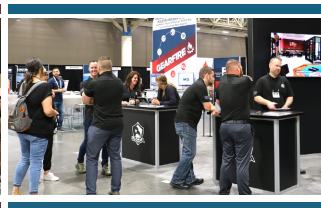


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EDUCATION



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If you have any questions, contact Zach Snow,
zsnow@nssf.org or 203-426-1320 ext. 224

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Objectives

- Recognize the costs of workplace incidents
- Detail benefits of implementing an effective safety and health program
- Describe the elements of an effective safety and health program



Costs of Incidents

- Direct Costs
 - Treatment
 - Physician and hospital
 - Medications
 - Medical equipment
 - Citations

U.S. Department of Labor
Occupational Safety and Health Administration
1033 La Posada
Suite 375
Austin, TX 78752



INVOICE / DEBT COLLECTION NOTICE

Company Name: Tap Rack Bang Indoor Shooting Range, LLC, dba The Gun Range
Inspection Site: 2401 S Fort Hood St., Killeen, TX 76542
Issuance Date: 01/18/2019

Summary of Penalties for Inspection Number	1340139
Citation 2, Serious	\$21435.00
Citation 3, Willful	\$192152.00
Citation 4, Other-than-Serious	\$800.00
TOTAL PROPOSED PENALTIES	\$214387.00



OSHA National News Release

U.S. Department of Labor

Please note: As of January 20, 2021, information in some news releases may be out of date or not reflect current policies.

Release Number: 10-1079-ATL
Aug. 23, 2010
Contact: Diana Petterson Michael D'Aquino
Phone: 202-693-1898 404-562-2076
E-mail: Petterson.Diana@dol.gov D'Aquino.Michael@dol.gov

US Department of Labor's OSHA cites E.N. Range Inc. in Miami, Fla., more than \$2 million for exposing workers to lead and other hazards

FORT LAUDERDALE, Fla. - The U.S. Department of Labor's Occupational Safety and Health Administration has issued citations to E.N. Range Inc. in Miami, Fla., alleging the company knowingly neglected to protect employees who clean gun ranges from serious overexposure to lead. It also provided, without medical supervision, non-FDA-approved treatments for lead exposure. The company was cited for more than 50 violations of the lead standard and others, with total proposed penalties of \$2,099,600.

"This company was well aware of what it needed to do to protect its workers from a well known hazard. It not only failed to provide that protection, it misled employees - most of whom had limited knowledge of English - into believing that it was providing them with appropriate medical treatment," said Secretary of Labor Hilda L. Solis. "Such a blatant disregard for the health of workers will not be tolerated under this administration."

E.N. Range has been cited for 42 willful and serious violations of the lead standard with proposed penalties of \$1,884,000. OSHA's lead standard requires employers to protect their workers from lead exposure which can cause many serious health issues including brain damage, paralysis, kidney disease, and even death.

OSHA's lead standard also addresses the use of chelating agents, which are medicines intended to reduce blood levels that can have significant adverse side effects. The standard prohibits the use of these agents prophylactically, and permits their therapeutic use only under the supervision of a physician in an appropriate clinical setting. Willful citations were issued alleging that E.N. Range violated this provision by giving its workers non-FDA-approved chelating agents without medical supervision.

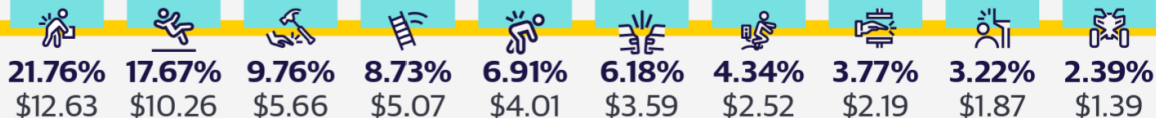
Costs of Incidents



Cost of top 10 most disabling workplace injuries: **\$49.18 billion**

2022

Percent total
Cost billions













Liberty Mutual Workplace Safety Index

Annual report from **Risk Control Services**

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Costs of Incidents

U.S. businesses spend more than one billion dollars a week on serious, nonfatal workplace injuries.

	Percent total	Cost billions		
1.	21.76%	\$12.63		Overexertion involving outside sources (handling object)
2.	17.67%	\$10.26		Falls on same level
3.	9.76%	\$5.66		Struck by object or equipment (being hit by objects)
4.	8.73%	\$5.07		Falls to lower level
5.	6.91%	\$4.01		Other exertions or bodily reactions (awkward postures)
6.	6.18%	\$3.59		Roadway incidents involving motorized land vehicle (vehicle crashes)
7.	4.34%	\$2.52		Slip or trip without fall
8.	3.77%	\$2.19		Caught in or compressed by equipment or objects (running equipment or machines)
9.	3.22%	\$1.87		Struck against object or equipment (colliding with objects)
10.	2.39%	\$1.39		Non-roadway incidents involving motorized land vehicles

Costs of Incidents

- Indirect Costs
 - Schedule delays
 - Lower morale
 - Increased absenteeism
 - Poor customer relations
 - Re-training



OSHA News Release - Region 6

U.S. Department of Labor

February 4, 2019

U.S. Department of Labor Cites Texas Indoor Gun Range For Exposing Employees to Unsafe Lead Levels

KILLEEN, TX – The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) has cited Tap Rack Bang Indoor Shooting Range LLC - operating as The Gun Range - for exposing employees to unsafe levels of lead at its facility in Killeen, Texas. The employer faces penalties totaling \$214,387.

OSHA investigated the shooting range in August 2018 after receiving a complaint of worker exposure to lead during firing range activities. Inspectors found airborne lead exceeding the permissible exposure limit, and lead contamination on surfaces throughout the facility. OSHA cited the company for failing to replace damaged personal protective equipment, and medically monitor employees for lead-related illnesses; and for sweeping up lead debris rather than using vacuum methods with high-efficiency particulate air filters.

OSHA's [National Emphasis Program on Lead](#) addresses lead hazards in the workplace. Inspections focus on hygiene facilities, engineering controls, respiratory protection, exposure monitoring, and medical surveillance. Employers are required to monitor their facilities to ensure workplace health and safety hazards are controlled. OSHA also has a [QuickCard®](#) to educate employers and workers on how to prevent lead exposure.

The company has 15 business days from receipt of its [citations](#) and penalties to comply, request an informal conference with OSHA's area director, or contest the findings before the independent [Occupational Safety and Health Review Commission](#).

Under the [Occupational Safety and Health Act of 1970](#), employers are responsible for providing safe and healthful workplaces for their employees. OSHA's role is to ensure these conditions for America's working men and women by setting and enforcing standards, and providing training, education and assistance. For more information, visit <http://www.osha.gov>.

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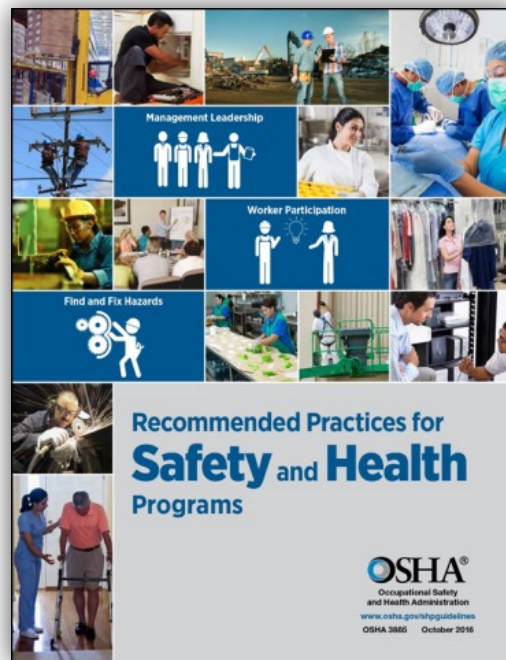
Media Contacts:

Chauntra Rideaux, 972-850-4710, rideaux.chauntra.d@dol.gov
Juan J. Rodriguez, 972-850-4709, rodriguez.juan@dol.gov

Release Number: 19-127-DAL

Safety & Health Programs

- Benefits
 - Improvements in product, process, and service quality
 - Better morale
 - Improved recruiting and retention
 - More favorable image and reputation
- Major elements
 - Management Leadership
 - Worker Participation
 - Hazard Identification and Assessment
 - Hazard Prevention and Control
 - Education and Training
 - Program Evaluation and Improvement
 - Multiple Employer Worksites



Management Leadership

Action Item 1:

Communicate your commitment to Safety and Health Programs

How to accomplish it:

- Establish a written safety and health policy statement signed by top management
- Communicate the policy to all workers, contractors, unions, supplier, visitors, customers, etc.

Action Item 2:

Define program goals and expectations

How to accomplish it:

- Establish realistic, attainable and measurable goals that demonstrate progress towards improving safety and health
- Develop safety and health plans

Management Leadership

Action Item 3:

Allocate Resources

How to accomplish it:

- Integrate safety and health into planning and budgeting
- Allow time in workers schedule for participation

Action Item 4:

Expect Performance

How to accomplish it:

- Define and communicate responsibilities and authorities for accountability
- Set an example for workers by following the same procedures
- Implement a graduated disciplinary action program



Worker Participation

Action Item 1:

Encourage workers to report safety and health concerns

How to accomplish it:

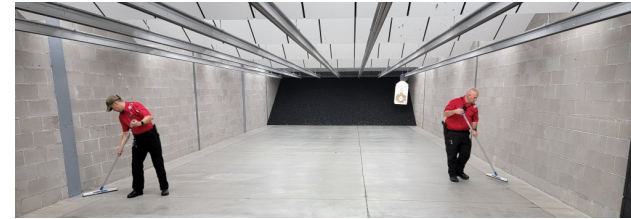
- Establish a process to report injuries, near misses and safety and health concerns
- Empower workers to temporarily suspend work they feel is unsafe

Action Item 2:

Encourage participation in the program

How to accomplish it:

- Provide positive reinforcement to workers who participate
- Maintain an open-door policy, inviting workers to speak to managers about safety and health



Worker Participation

Action Item 3:

Involve workers in all aspects of the program

How to accomplish it:

- Developing a program
- Reporting hazards and developing solutions
- Analyzing hazards
- Defining safe work practices
- Conducting site inspections
- Participating in incident/near-miss investigations
- Serving as trainers
- Developing and evaluating training programs



Worker Participation

Action Item 4:

Give workers access to safety and health information

How to accomplish it:

- Safety Data Sheets
- Injury Illness Data
- Results of exposure monitoring

Action Item 5:

Remove barriers to participation

How to accomplish it:

- Ensure workers from all levels of the organization can participate regardless of skill level, education, or language
- Ensure policies and programs do not discourage worker participation



Hazard Identification

Action Item 1:

Collect existing information about workplace hazards

How to accomplish it:

- Collect, organize and review information to determine what types of hazards are present and workers exposed
 - Lead, noise, chemical hazards, bloodborne pathogens, etc.

Action Item 2:

Inspect the workplace

How to accomplish it:

- Routine inspections of workflow, equipment, materials and talk to workers
- Use checklists



Hazard Identification

Action Item 3:

Conduct Incident Investigations

How to accomplish it:

- Develop a plan and procedure to begin investigation immediately after an incident or near miss
- Conduct root cause analysis and investigate with a team

Action Item 4:

Identify hazards associated with emergency & non-routine situations

How to accomplish it:

- Assess foreseeable emergency scenarios or non-routine tasks
- Conduct “table top” exercises to help you plan and test your response plan and procedures

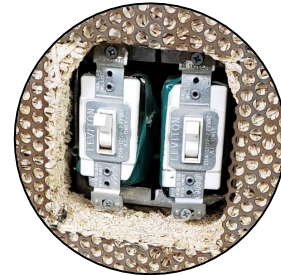
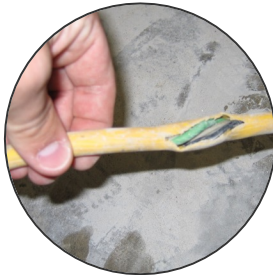
Hazard Identification

Action Item 5:

Characterize the nature of identified hazards, determine the controls to be implemented and prioritize the hazards for control

How to accomplish it:

- Evaluate each hazard by considering the severity of potential outcomes, the likelihood that an event will occur and the number of workers exposed
- Prioritize hazards so that the greatest risks are addressed first
- Use interim control measures to protect workers until more permanent solutions can be implemented



Hazard Prevention & Control

Action Item 1:

Identify control options

How to accomplish it:

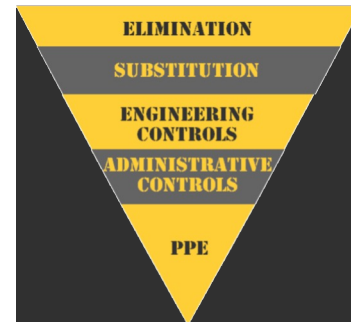
- Review literature, OSHA standards, NIOSH publications, etc. for potential control measures
- Get input from workers, safety consultants, or investigate other workplaces with similar hazards

Action Item 2:

Select controls

How to accomplish it:

- Select controls using the hierarchy of controls
- Use a combination when no single method fully protects the worker



Hazard Prevention & Control

Action Item 3:

Develop and update a hazard control plan

How to accomplish it:

- Prioritize hazards based on risk and assign control implementation responsibilities
- Set completion dates, plan how to track progress, and plan how to evaluate the effectiveness of implemented controls

Action Item 4:

Select controls for emergency and non-routine operations

How to accomplish it:

- Develop procedures to control hazards during these situations
- Assign responsibility for implementing the plan and conduct emergency drills

Hazard Prevention & Control

Action Item 5:

Implement selected controls in the workplace

How to accomplish it:

- Implement controls starting with highest priority, however, regardless of priority employers must protect workers from recognized serious hazards

Action Item 6:

Follow up to confirm that controls are effective

How to accomplish it:

- Conduct regular inspections of controls, confirm that work practices are being followed
- Track progress and implementation



Education & Training

Action Item 1:

Provide program awareness training

How to accomplish it:

- Provide training to all managers, supervisors and workers as well as contractors and temporary workers
 - Safety policies and procedures, program functions, emergencies, injury illness reporting, and their rights under the OSH Act
- Ensure the training is provided in a language and literacy level that all workers can understand



Education & Training

Action Item 2:

Train workers on specific roles and responsibilities in the safety and health program

How to accomplish it:

- Instruct workers with specific roles within the safety and health program on how they should carry out those responsibilities
- Provide opportunities for workers to ask questions and offer feedback during training

Education & Training

Action Item 3:

Train workers on hazard identification and controls

How to accomplish it:

- Train managers and workers on techniques for identifying hazards; such as job hazard analysis
- Have workers demonstrate they can recognize hazards and understand why controls are in place
- Provide training on new tasks and new assignments
- Provide training where required by specific OSHA standards such as; hazard communication and occupational noise

Program Evaluation

Action Item 1:

Verify the program is implemented and is operating

How to accomplish it:

- Verify the core elements of the program are fully met and key processes are in place and implemented
- Verify injuries are being reported, inspections are conducted, progress is being tracked in controlling identified hazards to ensure control measures are effective and data collected to monitor the programs performance



Program Evaluation

Action Item 2:

Correct program deficiencies and identify opportunities to improve

How to accomplish it:

- Proactively seek input from managers, workers, supervisors and other stakeholders on how you can improve the program
- Determine whether changes in equipment, facilities, material, personnel or work practices trigger any need for changes in the program
- Determine whether the metrics and goals are still relevant and how you could change them to more effectively drive improvements

Multi-Employer Worksites

Action Item 1:

Management Leadership

How to accomplish it:

- Provide a copy of the safety and health policy to all contractors
- Before beginning on-site work, clarify each employer's responsibilities and obligations, such as:
 - Providing training
 - Selecting, providing and maintaining PPE
 - Recording and reporting any injuries or illnesses
 - Procedures for communication between host employer and all contractors



Multi-Employer Worksites

Action Item 2:

Worker Participation

How to accomplish it:

- Encourage employees to raise safety concerns
- Identify and remove any obstacles to their participation in a program or reporting



Multi-Employer Worksites

Action Item 3:

Hazard Identification and Assessment

How to accomplish it:

- Host employer performs a worksite hazard assessment and shares the results
- Contractors perform pre-job hazard assessments of the work they will perform

Action Item 4:

Hazard Prevention and Control

How to accomplish it:

- Before beginning work, the host employer gives contractors information about programs and procedures to control workers' exposure to hazards

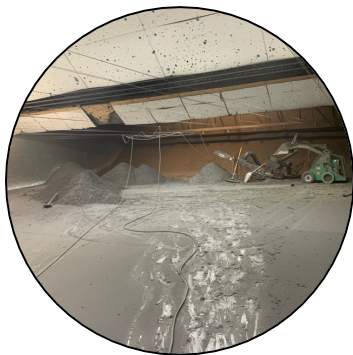
Multi-Employer Worksites

Action Item 5:

Education and Training

How to accomplish it:

- The host employer and contractor identify any qualifications and certifications required by the workers
- Temporary and contract workers also receive appropriate hazard and standard specific training



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Multi-Employer Worksites

Action Item 6:

Program Evaluation and Improvement

How to accomplish it:

- Exchange data on metrics tracks and use this data to evaluate the program's effectiveness
- All contractors should participate in these evaluations
- Sharing the results of the evaluations with contractors, subcontractors and temporary staffing agencies who can then inform the affected workers of the results

Safety & Health Program Recap

- Safety and health is not like icing on a cake
- Needs to be “baked” into the business
- Need management and ownership commitment
- Employee involvement is essential
- Develop an effective safety and health program
 - Written work rules/programs
 - Communicate work rules/programs to all employees
 - Assess compliance by conducting frequent inspections
 - Utilize a graduated disciplinary action program

Online Resources

- <https://www.osha.gov/safety-management>
- <https://www.osha.gov/incident-investigation>
- <https://www.osha.gov/sites/default/files/publications/small-business.pdf>

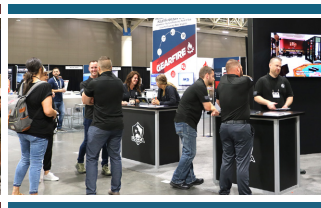


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Questions?



NSSF Compliance Consultant Team

ATF Consultants



Judy Bender
dog3mom1@msn.com
630-418-0141



Wally Nelson
nels4947@outlook.com
703-505-2617



John "JC" Clark
jc@fflconsultants.com
720-431-8821



John "JB" Bocker
jb@fflconsultants.com
(720) 336-0028



Patricia Smith
spatsy1968@gmail.com
251-401-3878



Renee Lewis
rlewis.consultant@gmail.com
916-717-5304



Harry McCabe
harry@mccabeconsultingllc.com
931-505-3638



Judyth Ledoux
ledoux.judyth@gmail.com
202-528-9465



OSHA Consultant

Dale Krupinski
oshacoach@ontargetsafetyacademy.com
303-351-7915

Additional Questions?

Email NSSF at:
membership@nssf.org



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