

The Goodyear Tire & Rubber Company
Akron, Ohio 44316 - 0001

July 12, 2002

John Dombrowski, Chief
TRI Regulations Development Branch (Mail Code 2841T)
U S Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Request for determination on shooting ranges

Dear Mr Dombrowski:

A shooting range operated for employee recreational purposes is located on the grounds of, or contiguous to, a TRI facility. Are there any conditions under which lead or lead compounds must be considered toward activity threshold calculations, and toward release calculations? If so, which activities, uses, and releases must be counted?

We have considered whether the "personal uses exemption" might apply to the shooting materials, and/or whether the activity of shooting a bullet fits within the definitions of "manufacture, process, or otherwise use", and cannot find applicable guidance.

Thank you for your assistance. If you require additional information, please contact me at (330) 796-1837.

Sincerely,



Martin G Trembly
Environmental Engineer – Principal
Global Environmental Services

cc: D L Chapman