

Lead Initial Determination Form

Company Name: Umarex / Walther Mfg

Location/Work Area: Production Shooter's, Quality Shooter's, Engineering Shooter, R&D, Facilities & Cleaning, Service, Gun Smith, Recovery. Ranges; Long Range, Testing Range, and Q.C. Range.

Date: 8/20/25

1. Job/Task Evaluated

Task/Process: All departmental Shooters, Range Cleaning,

Duration/Frequency: 8 Hour and 10 Hour Shifts from 7/21/25 - 8/5/2025

Employees Involved: Justin Khamphavong, David Butler, Zach Fijman, Colten Johnson, Kalen Kilgore, Matthew Caples, John Coppes, Dan Papp, Sean Shipman, Jonathan Long

2. Potential Sources of Lead Exposure

- Paint removal / scraping / sanding
- Welding, cutting, burning on lead-containing materials
- Casting, smelting, grinding, or machining lead
- Demolition or renovation of structures with lead-based paint

Other: Shooting Ranges

3. Evaluation Method

- Air monitoring conducted (attach results)
- Objective data reviewed (describe): _____
- Industry studies or historical data reviewed
- Professional judgment based on process/materials

4. Findings

- Exposure expected to be below action level ($30 \mu\text{g}/\text{m}^3$ TWA)
- Exposure expected to be at or above action level - further monitoring and compliance required
- Uncertain - monitoring required

5. Controls/Actions Required

Personal protective equipment (PPE)

Respiratory protection

Housekeeping requirements

Hygiene facilities/practices

Employee training

Medical surveillance

6. Determination Outcome

No further action required at this time

Positive initial determination – employer must comply with full lead standard requirements

7. Signatures

Evaluator Name/Title: Ezra Pitchford Safety Coordinator

Signature: [Handwritten Signature] Date: 8/28/25

Supervisor/Manager: Dana Spahn

Signature: [Handwritten Signature] Date: 8/28/25

ANALYTICAL REPORT

PREPARED FOR

Attn: Ezra Pitchford
Walther Arms
7700 Chad Colley Blvd.
Fort Smith, Arkansas 72916

Generated 8/20/2025 3:32:18 PM

JOB DESCRIPTION

Initial Determination 2025

JOB NUMBER

775-9622-1

Eurofins Built Environment Testing Richmond

Job Notes

AIHA LAP, LLC Accreditation ID 100531

Any reported concentrations are calculated as a convenience to the customer, and their overall accuracy depends on the accuracy of both sampling information provided to Eurofins Analytics (area swabbed for surface samples, air volumes/times for air samples, etc) and analyte amounts found by laboratory analysis. If diffusive air samplers were tested, air volumes are calculated from the customers' reported sampling times and manufacturer's published sampling rates.

A result reported with a '<' value included represents the Reporting Limit for this "non-detect" measurement.

Unless otherwise noted, results are not corrected for blank values.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Built Environment Testing - Richmond Project Manager.

Authorization



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Authorized for release by
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Definitions/Glossary

Client: Walther Arms
Project/Site: Initial Determination 2025

Job ID: 775-9622-1

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Case Narrative

Client: Walther Arms
Project: Initial Determination 2025

Job ID: 775-9622-1

Job ID: 775-9622-1

Eurofins Built Environment Testing Richmond

Job Narrative 775-9622-1

The analytical test results presented in this report meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page, unless otherwise noted. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable. Regulated compliance samples (e.g. SDWA, NPDES) must comply with associated agency requirements/permits.

- Matrix-specific batch QC (e.g., MS, MSD, SD) may not be reported when insufficient sample volume is available or when site-specific QC samples are not submitted. In such cases, a Laboratory Control Sample Duplicate (LCSD) may be analyzed to provide precision data for the batch.
- For samples analyzed using surrogate and/or isotope dilution analytes, any recoveries falling outside of established acceptance criteria are re-prepared and/or re-analyzed to confirm results, unless the deviation is due to sample dilution or otherwise explained in the case narrative.

Receipt

The samples were received on 8/8/2025 12:00 PM. Unless otherwise noted below, the samples arrived in good condition, and, where required, properly preserved and on ice.

Receipt Exceptions

For Recovery 01 (775-9622-A-10), gravimetric analysis is not possible due to weight discrepancy created by the vendor.

IH - Metals

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

IH - General Chemistry

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Client Sample Results

Client: Walther Arms
Project/Site: Initial Determination 2025

Job ID: 775-9622-1

Client Sample ID: MFG 6

Lab Sample ID: 775-9622-1

Date Collected: 07/30/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 1243.2 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	1243.2			88.6		1.00	0.0713		08/12/25 19:47

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	1243.2			0.116		0.0500	0.0933		08/11/25 10:05

Client Sample ID: MFG 8

Lab Sample ID: 775-9622-2

Date Collected: 07/30/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 1224.3 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	1224.3			93.3		1.00	0.0762		08/12/25 19:50

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	1224.3			0.209		0.0500	0.171		08/11/25 10:05

Client Sample ID: Quality 3

Lab Sample ID: 775-9622-3

Date Collected: 07/25/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 892.5 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	892.5			<1.00		1.00	<0.00112		08/12/25 19:54

Client Sample Results

Client: Walther Arms
Project/Site: Initial Determination 2025

Job ID: 775-9622-1

Client Sample ID: Quality 3

Lab Sample ID: 775-9622-3

Date Collected: 07/25/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 892.5 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	892.5			<0.0500		0.0500	<0.0560		08/11/25 10:05

Client Sample ID: Quality 2

Lab Sample ID: 775-9622-4

Date Collected: 07/22/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 1125.6 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	1125.6			<1.00		1.00	<0.000888		08/12/25 19:57

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	1125.6			<0.0500		0.0500	<0.0444		08/11/25 10:05

Client Sample ID: Eng 10

Lab Sample ID: 775-9622-5

Date Collected: 08/05/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 900.9 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	900.9			3.15		1.00	0.00349		08/12/25 20:00

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	900.9			0.0780		0.0500	0.0866		08/11/25 10:05

Client Sample Results

Client: Walther Arms
Project/Site: Initial Determination 2025

Job ID: 775-9622-1

Client Sample ID: R&D 4

Lab Sample ID: 775-9622-6

Date Collected: 07/23/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 1022.7 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	1022.7			<1.00		1.00	<0.000978		08/12/25 20:11

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	1022.7			<0.0500		0.0500	<0.0489		08/11/25 10:05

Client Sample ID: Maint 9

Lab Sample ID: 775-9622-7

Date Collected: 07/25/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 888.3 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	888.3			1.52		1.00	0.00172		08/12/25 20:14

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	888.3			0.0950		0.0500	0.107		08/11/25 10:05

Client Sample ID: Service 7

Lab Sample ID: 775-9622-8

Date Collected: 07/24/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 934.5 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	934.5			<1.00		1.00	<0.00107		08/12/25 20:18

Client Sample Results

Client: Walther Arms
Project/Site: Initial Determination 2025

Job ID: 775-9622-1

Client Sample ID: Service 7

Lab Sample ID: 775-9622-8

Date Collected: 07/24/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 934.5 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	934.5			0.131		0.0500	0.140		08/11/25 10:05

Client Sample ID: Gunsmith 5

Lab Sample ID: 775-9622-9

Date Collected: 07/23/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 924 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	924			<1.00		1.00	<0.00108		08/12/25 20:21

Method: NIOSH 0500 M - NIOSH 0500 (Modified)

Analyte	Analyte Method	Volume (L)	Front mg/sample	Rear mg/sample	Result mg/sample	Qualifier	RL mg/sample	Result mg/m3	Result	Analyzed
Total Dust	NIOSH 0500 M	924			<0.0500		0.0500	<0.0541		08/11/25 10:05

Client Sample ID: Recovery 01

Lab Sample ID: 775-9622-10

Date Collected: 07/21/25 00:00

Matrix: Air

Date Received: 08/08/25 12:00

Sample Air Volume: 905.1 L

Sample Container: IH - Cassette MCEF37mm0.8um3PCMW, C-04

Method: NIOSH 7303 M - NIOSH 7303 (Modified)

Analyte	Analyte Method	Volume (L)	Front ug/Sample	Rear ug/Sample	Result ug/Sample	Qualifier	RL ug/Sample	Result mg/m3	Result	Analyzed
Lead	NIOSH 7303 M	905.1			<1.00		1.00	<0.00110		08/12/25 20:25

Eurofins Analytics

10329 Stony Run Lane
 Ashland, VA 23005
 Phone 800-888-8061 Fax: 304-111-1111

Industrial Hygiene Samples Chain of Custody

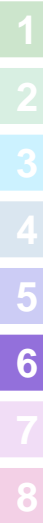
eurofins | '75 9622 COC
 Built



Client Information		Samples: Ezra Pitchford		Lab PM: Evermore, Brandi J		Carrier Tracking No(s):		COC No: 775-1754-1445 1	
Client Contact: Ezra Pitchford		Phone: 479-719-8752		E-Mail: brandi.evermore@et eurofinsus.com		Fed Ex		Page: Page 1 of 1	
Company: Walther Arms		Address: 7700 Chad Colley Blvd		TAT Requested (days): <input checked="" type="checkbox"/> Standard 5 days		City: Fort Smith		Job #:	
State, Zip: AR, 72916		Phone: 479-719-8752		Rush (Extra charges applied) <input type="checkbox"/> 4 days <input type="checkbox"/> 3 days <input type="checkbox"/> 2 days <input type="checkbox"/> 1 day <input type="checkbox"/> Same Day		PO #: Purchase Order not required		Total Number of samples	
Email: ezra.pitchford@waltherarms.com		Project Name: Initial Determination 2025		Project #: 77501196		Site:		Special Instructions/Note.	
#	Sample Identification	Sampling Date	Media Type	If Air Sample		If Area Sample		Total Number of samples	Special Instructions/Note.
				Sampling time (min)	Air Volume (L)	Area (cm2)	Area (cm2)		
1	MFG 6	7/30/2025	Lead Air	592	1243.2			1	
2	MFG 8	7/30/2025	Lead Air	583	1224.3			1	
3	Quality 3	7/25/2025	Lead Air	425	892.5			1	
4	Quality 2	7/22/2025	Lead Air	536	1125.6			1	
5	Eng 10	8/5/2025	Lead Air	429	900.9			1	
6	R&D 4	7/23/2025	Lead Air	487	1022.7			1	
7	Maint 9	7/25/2025	Lead Air	423	888.3			1	
8	Service 7	7/24/2025	Lead Air	445	934.5			1	
9	Gunsmith 5	7/23/2025	Lead Air	440	924			1	
10	Recovery 01	7/21/2025	Lead Air	431	905.1			1	
Deliverable Requested: I, II, III, IV, Other (specify)								Special Instructions/QC Requirements.	
Relinquished by:		Date/Time:	Company:	Received by: <i>[Signature]</i>		Date/Time: 8/8/25	Company:	Condition of the samples: Intact	
Relinquished by:		Date/Time:	Company:	Received by: Hannah Whitlock		Date/Time: 12:00	Company:	Condition of the samples:	
Relinquished by:		Date/Time:	Company:	Received by:		Date/Time:	Company:	Condition of the samples:	

4597 0345 9157

Ver 10/10/2024



Login Sample Receipt Checklist

Client: Walther Arms

Job Number: 775-9622-1

SDG Number:

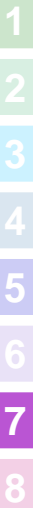
Login Number: 9622

List Number: 1

Creator: Whitlock, Hannah

List Source: Eurofins Built Environment Testing Richmond

Question	Answer	Comment
The package custody seal are intact.	N/A	
The package or samples do not appear to have been compromised or tampered with.	True	
Package temperature is acceptable, if required.	True	
COC is present.	True	
COC pages signed/dated and Condition Noted.	True	
COC is filled out in ink and legible	True	
There are no discrepancies between the containers received and the COC.	True	
Sample ID's on the devices match the COC.	True	
Devices are not broken or leaking.	True	
Sample custody seals, if present, are intact.	True	
All issues noted during receipt were communicated to Client and/or PM.	True	
Turnaround time from COC correctly noted in the login, if applicable.	True	



Sample Type	Last	First	Department	Job Position	Shift	Shift length (8, 10, 12)	Min time pump must run	Confirm Start Flow Rate =2 LPM	Pump ID	Cassette #	Sample Date	Pump start time	Pump stop time	Pump - Actual minutes pump ran	Does sample meet minimum time requirements?	Pump- Post flow rate	Volume	Valid Sample Obtained?	TWA Lead Results	TWA TL Dust Results	Notes/Observations (Date Sample recieved and LIA post)	Shipped to Lab	Report Recieved
Personal	Khamphavong	Justin	Production	MFG Shooter	1	10	525	Yes	3	MFG 6	7/30/2025	6:00:00 AM	4:30:00 PM	592	Yes	2.1	1243.2	Yes	0.7035	0.1151	7/30/2025	8/6/2025	8/20/2025
Personal	Butler	David	Production	MFG Shooter	1	10	525	Yes	4	MFG 8	7/30/2025	6:00:00 AM	4:35:00 PM	583	Yes	2.1	1224.3	Yes	0.0740	0.2077	7/30/2025	8/6/2025	8/20/2025
Personal	Fijman	Zach	Quality	Quality Shooter	1	8	420	Yes	3	Quality 3	7/25/2025	6:30:00 AM	2:23:00 PM	425	Yes	2.1	892.5	Yes	0.0010	0.0826	7/25/2025	8/6/2025	8/20/2025
Personal	Johnson	Colten	Quality	Quality Shooter	1	10	525	Yes	10	Quality 2	7/22/2025	6:00:00 AM	2:53:00 PM	536	Yes	2.1	1125.6	Yes	0.0008	0.0447	7/22/2025	8/6/2025	8/20/2025
Personal	Kilgore	Kalen	Engineering	Engineering Shooter	1	8	420	yes	10	ENG 10	8/5/2025	8:00:00 AM	4:40:00 PM	429	Yes	2.1	900.9	Yes	0.0031	0.0774	8/5/2025	8/6/2025	8/20/2025
Personal	Caples	Matthew	R&D	R & D Shooter	1	8	420	Yes	4	R&D 4	7/23/2025	8:00:00 AM	5:00:00 PM	487	Yes	2.1	1022.7	Yes	0.0010	0.0496	7/23/2025	8/6/2025	8/20/2025
Personal	Coppes	John	Facilities	Range Cleaning	1	8	420	Yes	4	Maint 9	7/25/2025	6:30:00 AM	2:20:00 PM	423	Yes	2.1	888.3	Yes	0.0015	0.0943	7/25/2025	8/6/2025	8/20/2025
Personal	Papp	Dan	Service	Service	1	8	420	Yes	6	Service 7	7/24/2025	8:00:00 AM	3:20:00 PM	445	Yes	2.1	934.5	Yes	0.0010	0.1298	7/24/2025	8/6/2025	8/20/2025
Personal	Shipman	Sean	Gunsmith	Gunsmith, Shooting	1	8	420	Yes	7	Gunsmith 5	7/23/2025	6:00:00 AM	2:05:00 PM	440	Yes	2.1	924	Yes	0.0010	0.0496	7/23/2025	8/6/2025	8/20/2025
Personal	Long	Jonathan	Recovery	Refurbish, Gunsmith	1	8	420	Yes	7	Recovery 01	7/21/2025	7:00:00 AM	2:03:00 PM	431	Yes	2.1	905.1	Yes	0.0010	NA	7/21/2025	8/6/2025	8/20/2025