

SSPC: The Society for Protective Coatings

QUALIFICATION PROCEDURE NO. 2

Standard for Evaluating Painting Contractors (Removal of Hazardous Coatings from Industrial/Marine Steel Structures)

1. Scope

1.1 This standard describes a method for evaluating the qualifications of industrial/marine painting contractors who remove hazardous coatings (e.g., coatings containing lead or other hazardous metals) from industrial/marine structures. The requirements of this procedure are intended to supplement the general requirements of SSPC-QP 1, QP 3, QP 6 or QP 8.

This standard establishes two qualification categories for contractors removing and containing hazardous coatings. The owner determines the certification category appropriate for any specific project based on containment and ventilation requirements.

1.2 This standard also establishes minimum requirements for worker health and safety programs and environmental protection programs utilized by the contractor during hazardous coating removal operations.

2. Description

2.1 DEFINITIONS

Auditor: 1) The person or persons performing audits on behalf of the qualifying agency. 2) The person(s) possessing the necessary technical and quality system auditing skills to review contractor submittals, conduct on-site audits of applicants, and report findings to the qualifying agency's program administrator in compliance with the requirements of this procedure and the written requirements of the formal audit program.

Contractor: A firm whose business is providing surface preparation and coating application and related services in the industrial and/or marine markets.

Competent Person: One who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees, the public, and the environment, and who has authorization to take prompt corrective measures to eliminate them. NOTE: U.S. Occupational Safety and Health Administration (OSHA) requires a competent person on-site during exposure-producing operations.

Hazardous Coatings: Coating systems that contain substances (e.g., lead or other hazardous metals) in sufficient

concentrations to create an occupational hazard for the worker, or an environmental hazard in the locale where disturbance of the coating during surface preparation is taking place.

Owner: The person, company or organization who owns the steel structure or operates the facility in which work is to be performed.

Procedure: The written sequence of steps necessary to carry out a particular course of action.

Qualification: The procedure by which written assurance is given that a contractor conforms to the prescribed set of conditions or requirements of this standard at the time of the on-site evaluation.

Qualifying Agency: The body responsible for development, maintenance, sponsorship and operation of a program to ensure uniform compliance with the provisions of this standard.

Qualified Person: A person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter, the work, or the project.

2.2 FUNCTIONS TO BE EVALUATED: The qualification process rates three areas: 1) Management of Hazardous Coating Removal; 2) Technical Capabilities; and 3) Personnel Qualifications and Training. Specific requirements (evaluation items) for each of these areas are presented in Section 4 of this standard.

The qualifying agency develops specific criteria, scoring and evaluation schemes for determining the qualifications of all contractors based on the qualification requirements in Section 4. The qualifying agency has the option to add evaluation items to address special requirements.

The evaluation items, criteria, and evaluation scheme constitute the "Evaluation Guidelines" used to determine a contractor's qualifications, based on the sequence of procedures in Section 5 of this standard.

2.3 QUALIFICATION CATEGORIES

2.3.1 This standard establishes two qualification categories for removing and containing hazardous coatings. These

categories differ in the extent of containment and ventilation required, based on whether negative air pressure and air movement are required.

Note: This standard is primarily geared toward the removal of coatings containing lead. However, if other hazardous materials or metals are present in the abrasive or previously applied coating system being disturbed, the contractor or entity qualified to SSPC-QP 2 is expected to be knowledgeable of applicable federal (OSHA and EPA), state and local requirements (or applicable regulations if disturbing hazardous paint outside of U.S. EPA and OSHA jurisdiction) for handling these materials and demonstrate the ability to invoke these requirements in their project-specific compliance program and during exposure producing operations.

2.3.2 Category A: This category consists of dry abrasive blast cleaning, power tool cleaning, wet abrasive blast cleaning, and water jetting, within a ventilated containment system. It entails the use of an engineered ventilation system with negative pressure in accordance with the following Classes as described in SSPC-Guide 6:

- Classes 1A or 2A
- Class 1P
- Class 1W

2.3.3 Category B: This category consists of dry abrasive blast cleaning, chemical stripping, power tool cleaning, wet abrasive blast cleaning, water cleaning or water jetting within containment in accordance with the following Classes as described in SSPC-Guide 6:

- Classes 3A or 4A;
- Classes 1C, 2C or 3C;
- Classes 2P or 3P;
- Classes 2W, 3W, or 4W

3. Referenced Standards and Regulations

3.1 The standards and references listed in Sections 3.3 and 3.4, if invoked by project specification, form a part of this standard.

3.2 The latest issue, revision, or amendment of the standards and other references shall govern unless otherwise noted.

3.3 SSPC Standards

SSPC-Guide 6	Guide for Containing Debris Generated During Paint Removal Operations
SSPC-Guide 7	Guide for the Disposal of Lead-Contaminated Surface Preparation Debris
SSPC-Guide 16	Guide to Selection and Use of Dust Collectors

SSPC-Guide 18	Specifier's Guide for Determining Containment Class and Environmental Monitoring Strategies for Lead-Paint Removal Projects
SSPC-QP 1	Standard Procedure for Evaluating the Qualifications of Industrial/ Marine Painting Contractors (Field Application to Complex Industrial and Marine Steel Structures)
SSPC-QP 3	Standard Procedure for Evaluating the Qualifications of Shop Painting Applicators
SSPC-QP 6	Standard Procedure for Evaluating the Qualifications of Contractors who Apply Thermal Spray (Metalizing) for Corrosion Protection of Steel and Concrete Substrates
SSPC-QP 8	Standard Procedure for Evaluating the Qualifications of Contracting Firms that Install Polymer Coatings and Surfacing on Concrete and Other Cementitious Substrates
SSPC-TU 7	Conducting Ambient Air, Water and Soil Sampling during Surface Preparation and Paint Disturbance Activities

3.4 U.S. Government Code of Federal Regulations¹

29 CFR 1910.134	Respiratory Protection
29 CFR 1926.21	Safety Training and Education
29 CFR 1926.59	Hazard Communication
29 CFR 1926.62	Lead
29 CFR 1926.1126	Hexavalent Chromium
29 CFR 1926.1127	Cadmium
29 CFR 1926.1118	Inorganic Arsenic
40 CFR 50	National Ambient Air Quality Standard for Lead
40 CFR 58	Siting Ambient Air Monitors
40 CFR 60	Appendix A,"Standards of Performance for New Stationary Sources
33 CFR 26	Subchapter D Clean Water Act
40 CFR 122	National Pollution Discharge Elimination System
40 CFR 260	Hazardous waste management system: General
40 CFR 261	Identification and listing of hazardous waste
40 CFR 262	Standards applicable to generators of hazardous waste
40 CFR 263	Standards applicable to transporters of hazardous waste
40 CFR 268	Land disposal restrictions

¹ The U.S. Code of Federal Regulations is available online at <http://www.access.gpo.gov>

4. Qualification Requirements

The contractor shall meet the requirements of Sections 4.1 through 4.4.6. Companies seeking qualification for work outside the U.S. must demonstrate compliance with the country's equivalent regulations.

4.1 The contractor shall meet the requirements of SSPC-QP 1, QP-6, or QP-8.

4.2 MANAGEMENT OF HAZARDOUS COATING REMOVAL

4.2.1 Contractor's Company Policy: The company mission or policy statement shall state in writing that the contractor is committed to the protection of contractor's employees, subcontracted workers or companies, leased workers, and the public from occupational and environmental hazards associated with lead and other hazardous coating removal operations. The contractor shall also take steps to protect the environment in accordance with all federal, state, and local regulations. The contractor must also present the policy verbally to those who may not understand the written document.

4.2.2 Authority and Responsibility of Competent Persons

4.2.2.1 Authority: The "competent person(s)," as defined in Sections 2.1 and 4.4.1, shall have the complete support of top management and written authority (including stop work authority) to ensure operations are carried out in accordance with compliance plans and governmental regulations. To ensure sufficient authority, competent persons shall report directly to the corporate safety, engineering, quality assurance, or quality control manager, project supervisor, project manager, superintendent, CEO, or any other cognizant member of management. Additional responsibilities and other work assignments assigned to the competent person(s) shall not prevent him/her from continually fulfilling the responsibilities of the competent person in Section 4.2.2.2 related to identifying and correcting conditions that are unsanitary, hazardous, or dangerous to employees, the public, and the environment. A back-up "competent person" shall be designated in the event the competent person is absent from the job site. The acting competent person shall not perform tasks that prevent continual monitoring of work activities disturbing hazardous coatings while such activities are in progress.

4.2.2.2 Responsibility: The competent person(s) shall be responsible for overseeing hazardous coating removal operations. Responsibilities shall include:

- a. Monitoring effectiveness and ensuring the continued integrity of containment and ventilation systems.
- b. Supervising worker exposure monitoring and medical surveillance or overseeing monitoring and surveillance

activities performed by other parties on behalf the contractor as required by the specification and the regulatory requirements for the applicable hazardous coatings.

- c. Ensuring that a hazard communication program and other applicable training has been conducted for the contractor's personnel on site as required by the specification and the regulatory requirements for the applicable hazardous coatings.
- d. Ensuring that employees working in the regulated area are wearing required personal protective equipment and are trained in the use and maintenance of such equipment and in the use of exposure control methods, personal hygiene facilities, respiratory protection, and decontamination as required by the specification and the regulatory requirements for the applicable hazardous coatings.
- e. Ensuring that fugitive emissions to air, water, or soil are minimized and that handling of all waste streams is in compliance with the specification and applicable regulations.
- f. Controlling access to the work site and ensuring that contamination control boundaries are marked off.
- g. Maintaining project documentation, such as initial and periodic biological monitoring, ventilation performance checks, respirator fit tests, results of worker exposure monitoring, results of site safety inspections, medical surveillance results, etc., in accordance with the programs required in Sections 4.3.6.1 and 4.3.7.1.
- h. Ensuring that contractor has copies of applicable regulations and technical standards applicable to exposure-producing operations.

4.3 TECHNICAL CAPABILITIES

4.3.1 Qualification Categories: The contractor shall meet the requirements for the qualification category specified (see Sections 2.3.2 and 2.3.3). The requirements for qualification categories A and B are given in Sections 4.3.2 and 4.3.3. Note: In addition to the requirements given in Sections 4.3.2 or 4.3.3, the contractor shall also meet all other requirements of this standard.

4.3.2 Requirements for Category A: The contractor shall provide objective evidence (e.g., documentation) that it has fulfilled contract specification and applicable regulatory requirements for hazardous coating removal projects at least six production months prior to the initial qualification audit. The documentation shall demonstrate how the contractor:

- a. Handled hazardous materials and waste.
- b. Performed coating removal using containment and ventilation that met the requirements of Section 2.3.2.
- c. When applicable, used suspended or supported work platforms that were designed, constructed and maintained in accordance with the requirements of