

SSPC: The Society for Protective Coatings

QUALIFICATION PROCEDURE NO. 2

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

1. Scope

1.1 This procedure describes a method for evaluating the qualifications of industrial/marine painting Contractors who remove hazardous coatings. The requirements of this procedure are intended to supplement the general requirements of SSPC-QP 1, QP 6, QP 8, and any other standard that invokes SSPC-QP 2 by reference.

1.2 This procedure establishes two qualification categories for Contractors who remove and contain hazardous coatings, based on containment classifications described in SSPC-Guide 6. The Facility Owner determines the qualification category appropriate for any specific project.

1.3 This procedure also establishes minimum requirements for worker health and safety programs and environmental protection programs utilized by the Contractor during hazardous coating removal operations.

1.4 The Contractor is required to be knowledgeable of applicable federal (U.S. OSHA⁽¹⁾ and EPA⁽²⁾), state and local requirements (or applicable regulations for contractors operating outside the U.S.) for handling these hazardous coatings, and to demonstrate the ability to invoke these requirements in project-specific compliance programs and during exposure-producing operations.

2. Description

2.1 DEFINITIONS

Auditor: The person or persons performing audits on behalf of the Qualifying Agency in compliance with the requirements of this procedure and the written requirements of the Qualifying Agency's audit program.

Contractor: A firm whose business is providing surface preparation and coating application and related services that results in the disturbance of hazardous coatings, who is subject to the evaluation described in this standard.

⁽¹⁾ U.S. Department of Labor, Occupational Safety & Health Administration (OSHA), 200 Constitution Avenue, Washington, D.C. 20210, phone 1-800-321-OSHA (6742)

⁽²⁾ US Environmental Protection Agency (EPA), 1200 Pennsylvania Avenue, NW, Washington, DC 20460, phone (202) 564-4700.

This standard was first issued in 1993 and revised in 1995, 2000, 2009 and 2019 by the SSPC C.5.3.D, Hazardous Paint Removal qualification Committee.

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: Most U.S. Occupational Safety and Health Administration (OSHA) Comprehensive Health Standards for hazardous coatings require a Competent Person on-site during exposure-producing operations.

Facility Owner: The public or private owner or custodian of assets subject to surface preparation and coating application work, to which the Contractor has a direct or indirect contractual obligation to provide such services.

Hazardous Coatings: Coating systems that contain substances (e.g., lead, arsenic, cadmium, hexavalent chromium, or other hazardous metals) in sufficient concentrations to create an occupational hazard for the worker, or an environmental hazard, or result in a regulated or hazardous waste.

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

Qualification: Written assurance given by a Qualifying Agency that a Contractor conforms to the prescribed set of conditions or requirements of this procedure.

Qualifying Agency: An organization (e.g. Certifying Agency or Facility Owner) responsible for sponsorship or operation of a program to ensure uniform compliance with the provisions of this procedure.

Surface Preparation: Any method of treating a surface to prepare it for coating. Surface preparation methods include washing with water, detergent solution, or solvent; cleaning with hand or power tools; water washing or jetting with or without abrasive; or abrasive blast cleaning.

2.2 FUNCTIONS TO BE EVALUATED: This procedure identifies three functional areas to be evaluated:

- Management of hazardous coating removal
- Technical capabilities
- Personnel qualifications and training

General requirements for each of these functional areas are presented in Section 4.

2.3 QUALIFICATION CATEGORIES

2.3.1 This standard procedure establishes two qualification categories for removing and containing hazardous coatings. These categories differ in the extent of containment and ventilation, based on whether negative air pressure and air movement are required.

2.3.2 Category A: This category consists of surface preparation 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 surface preparation 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 Section 3.3 contain information necessary for compliance with the requirements of SSPC-QP 2. Contractors operating under U.S. law are also required to comply with U.S. Code of Federal Regulations (CFR) regulations listed in Section 3.4 and with additional standards and references invoked by project specifications. The latest issue, revision, or amendment of the standards and other references shall govern unless otherwise noted.

3.2 If there is a conflict between the requirements of any of the documents listed in Section 3.3 and those of this SSPC procedure, the requirements of this procedure shall prevail.

3.3 SSPC Documents

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 and Other Metal Components)

SSPC-QP 6	Standard Procedure for Evaluating the qualifications of Contractors who Apply Thermal Spray (Metallizing) 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 Regulations⁽³⁾

29 CFR 1910.134	Respiratory Protection
29 CFR 1926.16	Rules of Construction
29 CFR 1926.21	Safety Training and Education
29 CFR 1926.57	Ventilation
29 CFR 1926.59	Hazard Communication
29 CFR 1926.62	Lead
29 CFR 1926.1124	Beryllium
29 CFR 1926.1126	Hexavalent Chromium
29 CFR 1926.1127	Cadmium
29 CFR 1926.1118	Inorganic Arsenic
40 CFR 50	National Primary and Secondary Ambient Air quality Standards
40 CFR 58	Ambient Air quality Surveillance
40 CFR 60, App A	Standards of Performance for New Stationary Sources, Methods 9 and 22
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
40 CFR Subchapter D	Water Programs (33 U.S. Code, §1251)
40 CFR Chapter I	Subchapter J – Superfund, Emergency planning, and Community Right-to-Know Programs

Refer to 29 CFR 1915 for shipyard regulations.

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 equivalent regulations of the country where work is taking place.

⁽³⁾ The U.S. Code of Federal Regulations is available online at <https://www.govinfo.gov/ncfr?page=browse>

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. The Competent Person(s) may have additional responsibilities and carry out other work assignments, as long as these duties and responsibilities do not prevent him/her from continually fulfilling the responsibilities of the Competent Person listed 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 Competent Person shall be on site during any activities that may produce emissions of or exposure to hazardous material, and shall not perform tasks that prevent continual monitoring of work activities disturbing hazardous coatings while such activities are in progress. These activities would include but are not limited to power tool cleaning, abrasive blasting, blowdown, vacuuming grit, handling waste, or working on equipment or containment contaminated with hazardous materials.

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 of 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 4.3.5.1 and 4.3.6.1.
- h. Ensuring that the 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 Section 4.3.2.

4.3.2 Requirements for Category A and Category B: The Contractor shall provide objective evidence (e.g., documentation) that it has fulfilled project 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, substances, and waste.