

SSPC: The Society for Protective Coatings

QUALIFICATION PROCEDURE NO. 4

Standard Procedure for Evaluating the Qualifications of Contractors Disturbing Hazardous Coatings During Demolition and Repair Work

1. Scope

1.1 This standard establishes a procedure for evaluating the qualifications of contractors whose work involves disturbance of hazardous coatings (e.g., containing lead or other hazardous metals) incidental to demolition or repair work on complex or conventional structures.

1.2 This standard establishes two qualification categories for contractors disturbing and containing hazardous paint. The specifying agency shall designate the required qualification category for the contractor based on the type and level of containment and ventilation required.

1.3 This standard procedure also establishes minimum requirements for worker health and safety programs and environmental protection programs utilized by the contractor who disturbs hazardous coatings incidental to demolition or repair work.

1.4 Contractors qualified under SSPC-QP 2 already meet the requirements of this standard procedure.

2. Description

2.1 DEFINITIONS

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. OSHA requires a competent person on-site during exposure-producing operations.

Complex Structure: Complex structures are those constructed of steel or concrete, such as metal producing and rolling mills, bridges, and processing facilities, including chemical and petrochemical processing plants, pulp and paper mills, power plants and substations, and food and beverage plants and terminals.

Contractor: A firm that performs general construction (i.e., demolition and repair work) in the industrial and commercial markets.

Conventional Structures: Structures such as light manufacturing plants; miscellaneous and ornamental iron work; sign structures; storage tanks; low rise, truss, beam, and column

structures. Simple rolled beam bridges may also be covered by the requirements of this standard procedure.

Evaluating Authority: A facility owner or authority designated by the facility owner to review contractor submittals, conduct on-site evaluations and report results of the evaluation determining if the contractor is in compliance with the requirements of this procedure.

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 exposed to or handling the coating waste, or an environmental hazard in the locale where disturbance of the coating is taking place.

Limited Amounts: Only the minimum amount of paint that should be removed from localized areas to meet regulations for: flame cutting of existing steel for the purpose of demolition; arc gouging to disconnect existing steel members; welding of new steel members to existing members; welds for the retrofitting of bearings, etc.

Qualification: The procedure by which written assurance is given that an applicant conforms to the prescribed set of conditions or requirements of this standard procedure.

Subcontractor: For the purposes of this qualification procedure, the term "subcontractor" is interchangeable with the term "contractor" and is defined as the same.

2.2 FUNCTIONS TO BE EVALUATED

2.2.1 The qualification process rates four areas: 1) Management of Hazardous Paint Removal; 2) Technical Capabilities; 3) Qualification of Personnel; and 4) Safety Health, and Environmental Compliance. Specific requirements (evaluation items) for each of these areas are presented in Section 4 of this standard procedure. For special requirements, additional evaluation items may be included.

2.2.2 The evaluating authority shall develop specific criteria, scoring, and evaluation schemes for determining the qualifications of all contractors based on the evaluation items in Section 4. For special requirements, additional evaluation items may be included.

2.2.3 The criteria, scoring, and evaluation schemes constitute the "Evaluation Guidelines" used to determine a contractor's qualifications, using the sequence of procedures in Section 5 of this standard procedure.



2.3 QUALIFICATION CATEGORIES

2.3.1 This standard procedure establishes two qualification categories for removing and containing hazardous (e.g., lead-based) paint. These categories differ in the extent of containment and ventilation required, based on the amount of dust and debris likely to be generated during repair and demolition. Note: This standard procedure is primarily geared toward lead paint removal work. However, if chromium or other hazardous materials are present in the previously applied coating system, the contractor is expected to be familiar with OSHA and EPA requirements for handling these materials.

2.3.2 Category A: This category consists primarily of chemical stripping and power tool cleaning within containment in accordance with Class 1C or 1P of SSPC-Guide 6. Contractors qualifying for Category A automatically qualify for Category B.

2.3.3 Category B: This category consists primarily of chemical stripping and power tool cleaning within containment in accordance with Class 2C, 3C, 2P or 3P of SSPC-Guide 6. Qualification for Category B does not automatically include qualification for Category A.

3. Referenced Standards

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

3.3 If there is a conflict between the requirements of any of the references and this procedure, the requirements of the procedure shall prevail.

3.4 SSPC STANDARDS:

Guide 6	Guide for Containing Debris Generated During Paint Removal Operations
Guide 7	Guide for the Disposal of Lead-Contaminated Surface Preparation Debris
QP 2	Standard Procedure for Evaluating the Qualifications of Painting Contractors to Remove Hazardous Paint

3.5 U.S. GOVERNMENT CODE OF FEDERAL REGULATIONS:

29 CFR, Part 1926	"Safety and Health Regulations for Construction"
40 CFR, Part 50	Appendix G, "National Ambient Air Quality Standard for Lead"

40 CFR, Subchapter I "Solid Wastes" (parts 260-263 and 268)

3.6 U.S. DEPARTMENT OF LABOR, OCCUPATIONAL HEALTH & SAFETY ADMINISTRATION (OSHA):

OSHA Guidelines on Workplace Safety and Health Program Management (Issued as 54 FR 3904, January 26, 1989)

OSHA Instruction CPL 2-2.58, Inspection and Compliance Procedures for 29 CFR 1926.62, Lead Exposure in Construction, Interim Final Rule

4. Qualification Requirements

The contractor shall meet the requirements of 4.1 through 4.4.

4.1 MANAGEMENT OF HAZARDOUS PAINT REMOVAL

4.1.1 Contractor's Company Policy: The company mission or policy statement shall state in writing that the contractor is committed to the protection of workers and the public from occupational and environmental hazards associated with disturbance of lead-based or other hazardous paint during demolition or repair work. The contractor should take steps to protect domestic and wild animals, fowl, and fish. The contractor must also present the policy to all employees verbally to reinforce the spirit of the contractor's mission and ensure that employees who cannot read English understand it.

4.1.2 Authority and Responsibility of Competent Persons

a. Authority: The "competent person," as defined in sections 2.1 and 4.3.1, shall have the complete support of top management and the written authority to ensure that operations are carried out in accordance with compliance plans and governmental regulations, independent of production pressures. To ensure independence, competent persons shall report directly to a manager not involved with production. The competent person may have additional responsibilities and carry out other work assignments, but shall not routinely be a production member of the work crew.

b. Responsibility: The competent person shall be responsible for overseeing hazardous paint removal operations. Responsibilities shall include:

1. Monitoring effectiveness and ensuring the continued integrity of environmental controls.
2. Monitoring worker exposure or overseeing monitoring activities performed by others.
3. Ensuring that a hazard communication program and other applicable training has been conducted for the contractor's personnel on site.
4. Ensuring that employees working in the exposure area are wearing personal protective equipment.

and are trained in the use of such equipment and in the use of exposure control methods, personal hygiene facilities, respiratory protection, and decontamination practices.

5. Ensuring that the engineering controls in use are in operating condition and functioning properly.
6. Ensuring that fugitive emissions to air, water, or soil are minimized and that handling of all waste streams is in compliance with applicable regulations and contract specifications.
7. Ensuring that regulated areas are marked off and controlling access to them.
8. Maintaining project documentation, such as exposure assessment results, ventilation performance checks, respirator fit tests, personal monitoring results, results of site safety inspections, medical surveillance results, etc., in accordance with the programs required in Section 4.4.

4.1.3 Information Resources: The contractor shall identify a source for obtaining information on relevant regulations pertaining to hazardous paint removal and industrial hygiene procedures. A reference file of information shall be maintained at the job site or be readily accessible. (See Section 4.2.5 for types of references.)

4.2 TECHNICAL CAPABILITIES

4.2.1 Qualification Categories: The contractor shall meet the requirements for the qualification category specified (see Section 2.3). The requirements for qualification categories A and B are given in Sections 4.2.2 and 4.2.3. Note: In addition to the requirements given in Sections 4.2.2 and 4.2.3, the contractor must also meet all the other requirements of this standard procedure.

4.2.2 Requirements for Category A: The contractor shall demonstrate competence in the following:

- Protecting, storing, and labeling hazardous materials and waste (see Section 4.6.1).
- Operation, maintenance, and safety when using water jetting, wet abrasive blast, dry abrasive blast, power tool cleaning or other coating removal equipment.
- Coating removal using containment and ventilation that meets the requirements of Class 1A or 2A, or 1W or 1P of SSPC-Guide 6.
- Operation, maintenance, and safety when using abrasive or water recovery equipment.
- Maintaining employee exposures below the appropriate OSHA Permissible Exposure Limit (PEL) first through use of engineering and work practice controls to the extent that such controls are feasible and secondarily through use of respiratory protection that complies with current OSHA regulations.
- Coating removal using containment and ventilation that meet the requirements of Class 1C or 1P of SSPC-Guide 6

- Assessing quantity of emissions and worker exposure.

4.2.3 Requirements for Category B: The contractor shall demonstrate competence in the following:

- Protecting, storing, and labeling hazardous materials and waste (see Section 4.4.2).
- Operation, maintenance, and safety when using chemical stripping equipment and materials, power tools, or other paint removal equipment.
- Maintaining employee exposures below the appropriate OSHA Permissible Exposure Limit (PEL) first through use of engineering and work practice controls to the extent that such controls are feasible and secondarily through use of respiratory protection that complies with current OSHA regulations.
- Coating removal using containment and ventilation that meet Class 2C, 3C, 2P, or 3P of SSPC-Guide 6.
- Assessing quantity of emissions and worker exposure.

4.2.4 Verifying Qualification Categories: Contractors shall submit evidence of successfully meeting the specification requirements of hazardous paint removal jobs, using environmental controls in accordance with the owner's specifications. Evidence shall include documentation of hazardous paint removal jobs in which the contractors are currently involved or that they have completed in the last 24 months. Documentation shall include the following.

- a. Description of the jobs, including:
 - Facility name, address, and principal contact.
 - Brief description of structure and work performed, including dates on site.
 - Method used to disturb paint.
 - Environmental controls used.
 - Types of containment and ventilation used, if applicable.
 - Portion of project specification dealing with safety, health, and environmental control.
 - Name of competent person on site.
- b. Verification of successful completion of the jobs described, including compliance with applicable federal, state, and local regulations enforceable during the project.

4.2.5 Technical Library: The contractor shall have an up-to-date library of industrial and governmental resources on subjects related to hazardous paint removal, including:

- a. Relevant federal, state, and local occupational safety and health standards, regulations, compliance directives, and guidelines.
- b. Ventilation standards and procedures, if applicable.
- c. Relevant federal, state, and local environmental regulations regarding solid and hazardous waste and on air, water, and soil quality.
- d. Containment guidelines and technical data sheets (e.g., equipment operation manuals).