



SSPC QP1  
APPLICATION,  
INSTRUCTIONS,  
AND  
PROGRAM RULES

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# Application Form, Instructions, and Program Rules / SSPC QP1

## I. Introduction

SSPC developed the Painting Contractor Certification Program (PCCP) to verify capabilities of Contractors performing industrial surface preparation and coating application in the field. The program's objective is to determine if an industrial/marine coatings Contractor has the personnel, organization, qualifications, procedures, knowledge, and capability to produce quality surface preparation and coating application of complex industrial and marine structures. Complex industrial and marine structures are defined as those constructed of steel such as metal producing and rolling mills, bridges (e.g. highways) and processing facilities, including chemical and petrochemical processing plants, pulp and paper mills, power plants and substations, food and beverage plants, terminals, storage tanks, Navy and commercial vessels.

Please note that the SSPC QP1 Certification process does not involve inspection of the contractor's coating work or training of its personnel. It does not cover coating application capability conducted exclusively at a contractor's fixed facility (i.e. shop painting) nor does it cover installation of protective coatings on concrete. Shop painting is covered by the QP3 Certification Program (see "Lists, Applications and Forms" on [www.sspc.org](http://www.sspc.org)). Finally, the program is not intended to guarantee the quality or safety performance of a specific Contractor on any of its projects. Rather, it is intended to assist facility owners in their evaluation of the primary technical capabilities of potential bidders. While SSPC certification confirms a company's capability to meet the requirements of SSPC QP1, owners, specifiers and general contractors can also assess the painting contractor's financial ability to perform a job as well as the contractor's previous work history, capability to meet site-specific requirements, and other areas not covered under this program. To better ensure the success of a project, owners should write quality specifications, implement a plan to enforce the requirements of the specification through appropriate quality assurance and establish a plan to maintain good communication with the Contractor before work begins and during the project. This is in addition to ensuring that the Contractor is capable of performing the work.

This package contains information and materials needed to apply for SSPC QP1 Certification. You will find copies of this application and all other documents detailing program requirements, related procedures, clarifications, etc. on SSPC Online at <http://www.sspc.org>. Contractors who desire program information but who do not have access to the Internet can also contact SSPC staff directly for copies of any and all program related documents. Contact SSPC Certification: Gloria Dawson at X2209 or Norm Suzich at: X2235 (877-281-7772).

While every precaution is taken to ensure that all information furnished is accurate and complete, SSPC cannot assume responsibility nor incur any obligation resulting from the use or misuse of the methods contained herein, or of the program itself.

**Important Note:** Contractors applying for SSPC QP1 certification must demonstrate a history of compliance with QP1 quality and safety requirements. QP1 applicants must be able to document that necessary components of its quality program have been in place company-wide for at least six production months prior to the initial evaluation. For instance, where an evaluation item requires specific procedures to be in force, such as the preparation and maintenance of Quality Control reports, the procedures must have been in force at least 6 production months prior to the time when the contractor undergoes the initial audit. Once certified, the Contractor is expected to consistently apply required certification procedures year round for all industrial painting jobs.

## Initial Application Instructions

### Filling out the application:

Fill out the information requested in the beginning of the application with proper signatures and include this with the submittal items.

### Compiling the required items as listed in the application:

The submittal items are listed in detail and have been numbered for clarity when referencing. Compiling the information in a three-ring binder is required to keep all material in order. Provide each item (documents) as listed in the application and "tab" and "label" each item as it is referenced in the application. This practice will save time during the initial review process. After the initial review, if any of the items (documents) are missing, SSPC will notify you and will not continue the review until the missing items are provided. This is why it is important to reference the submittal items, so that both the Contractor and SSPC can confirm that all the necessary information is present.

### Submitting the application:

You must provide SSPC with two copies for review. Why? One copy is kept at the SSPC Corporate Office and the other is provided to the auditor assigned to your audit. SSPC suggests that a third copy is kept at the contractor location.

**Audit fees:** Must be provided to SSPC when submitting the application for review. SSPC accepts checks and credit cards. Credit card payments can be taken over the phone.

**After the application is reviewed by SSPC:**

Once the initial application review process is complete, it is assigned to an SSPC Auditor. The Auditor will contact you to schedule an office audit and an audit at an active job site.

If you have questions regarding the submittal process, please call Gloria Dawson at 877-281-7772 or 412-281-2331 X2209.

**II. General Program Procedure**

The SSPC QP1 certification process contains this sequence of procedures that you must follow:

- a. Complete the application form found in Item III.
- b. Gather and prepare the required information outlined in Item III following the application.
- c. Send SSPC the application, submittal items, and appropriate non-refundable certification fee and any required audit deposit.
- d. SSPC staff will review your application and submittals within 5 working days after receipt. If everything is in order, an on-site audit will be performed. If not, SSPC will indicate what must be done, or what additional information is required, to complete the submittal. Note: The initial job site visit will most likely be announced, and may be performed at the job site selected by SSPC.
- e. An SSPC program auditor will conduct the evaluation at one or more active (complex structure) job sites, to verify conformance with QP1 requirements. The audit usually takes two to three days to complete, and always includes a visit to your offices and one or more active (complex structure) job sites (selected by SSPC) that are representative of work that your company performs. Note: The auditor will review randomly selected project files on projects listed in your submittal. These files as well as management and production personnel familiar with those projects must be available during the audit for an initial audit to be completed. The auditor must visit your headquarters office as part of the initial audit.
- f. It is important to know what information must be available at the job site to show the auditor during the audit. This information can be found on the SSPC web site at <http://www.sspc.org/certification/PCCP/auditlistQP1.html>
- g. At the end of the audit, the auditor will schedule an exit interview for the purpose of advising you of any deficiencies, corrective actions, or concerns cited or noted during the audit.
- h. If your firm has a qualifying score, SSPC will certify it for a three-year period subject to its ability to maintain program standards. Your company's ability to maintain certification standards during the three year certification term is confirmed through: (1) annual announced and unannounced audits which your company must undergo at least once in each of the three years of the certification term; (2) your company's ability to adhere to the program's administrative rules; (3) avoidance of disciplinary actions as described in the Disciplinary Action Criteria (DAC). Certification lapses after three years. Note: Companies eligible for the random audit program may be exempt from the mandatory annual Audit; at the discretion of the SSPC Certification Manager (see Item X, Random Audit Program for details).
- i. If your firm does not qualify, you have up to 45 days after SSPC notifies you of your audit results to submit an acceptable written corrective action plan to correct deficiencies and change system procedures and request a follow-up audit at a later date. If you don't submit acceptable corrective actions within 45 days, you must re-apply for initial certification.
- j. The program provides for an appeal procedure, should you disagree with audit findings.

**III. QP1 Application Form** for the SSPC Painting Contractor Certification Program, Field Coating of Complex Structures  
Instructions: The application form is used to provide information that will aid in evaluating and rating your firm. To avoid delays in carrying out the evaluation process, you must answer all questions accurately and truthfully. Information must be either typed or clearly printed. **Please send SSPC two typed or printed copies of your completed application and all submittals with the correct non-refundable fees.**

1. A): Company Name:

Principal Officer/Title:

Company Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Web Site Address (if applicable): \_\_\_\_\_

Telephone (include Area Code): \_\_\_\_\_

Fax Number: \_\_\_\_\_ Federal I.D.#/EIN \_\_\_\_\_

(enclose copy of Fed I.D./EIN notification from the IRS or equivalent form for non USA based Contractors)

B): Branch / Division Office Address (if more than 1, please submit a list of branch / division offices with the information requested in 1A):

\_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Web Site Address (if applicable): \_\_\_\_\_

Telephone (include Area Code): \_\_\_\_\_

Fax Number: \_\_\_\_\_ Federal I.D.#/EIN \_\_\_\_\_

(enclose copy of Fed I.D./EIN notification from the IRS or equivalent form for non USA based contractors)

Provide a list of current owners (if you are not publicly traded):

\_\_\_\_\_

2. Ownership: Private Ownership  Sole  Partnership  Corporation  
 Publicly Traded Stock Ownership

3. Years your company has operated under name listed in Question #1:

If less than 3 years, list previous names below:

Previous Name: \_\_\_\_\_ From: \_\_\_\_\_ To: \_\_\_\_\_

Previous Name: \_\_\_\_\_ From: \_\_\_\_\_ To: \_\_\_\_\_

Is the location listed in 1A the main place of business?  Yes  No

4. Has your company undergone (within the past 18 months) or is it planning to undergo any significant changes (e.g. name change; change in ownership; Chapter 7, 11, or 13; purchase or takeover of another contracting firm; joint venture/partnership with another contractor; executive management personnel changes, etc.)  Yes  No

If yes, please attach an explanation that meets the notification requirements described in Item X, Part A, "Major Changes in a Company's Organization,"

5. Field Audit of an Active Job Site\_ The certification program requires the auditor to conduct a field visit to an active complex structure job site. List location of jobs in progress where job site audits can be conducted. (Please include any restrictions below such as special safety requirements, facial hair, security clearances, etc.)

a. Job Site:

Restrictions: \_\_\_\_\_

Name, title, and phone number (including cell phone) of your contact person on this job site:

Day and Time Work Crews on job site:

b. Job Site:

Restrictions: \_\_\_\_\_

Name, title, and phone number (including cell phone) of your contact person on this job site:

Day and Time Work Crews on job site:

c. Job Site:

Restrictions: \_\_\_\_\_

Name, title, and phone number (including cell phone) of your contact person on this job site:

Day and Time Work Crews on job site: \_\_\_\_\_

6. Current experience modification rate (EMR) for State/Province of Domicile and Principal States/ Provinces of Operation. Provide documentation of experience modification rates on your Insurance Company and State/Provincial Workmen's Compensation Bureau (Board) letterhead per evaluation item described in Item IV, Part D. Submit a detailed explanation for any EMR above 1.25.

7. Attach copies of any federal, or state/provincial or local regulatory agency worker safety and health or environmental non-compliance, or other regulatory violations (e.g. wage and hourly violation) and citations issued to any of your firm's industrial painting operations during the previous 36 months. Provide resolution/settlement/notice of contest documentation if applicable, as well as a brief summary of policy changes and actions your company has taken as a result of the citations. Submit required copy of OSHA Form 170 or equivalent regarding fatalities that have occurred on your job sites in the last 36 months.

8. Has your company or any of its personnel been accused/charged/alleged by a Court (Local, State, or Federal) to be involved in any of the following practices in the past 36 months: (1) fraud; (2) alteration of test results or reports; (3) criminal conviction; (4) misrepresentation of information; (5) illegal business practices; (6) illicit surface preparation or coating application operations. (Refer to the Disciplinary Action Criteria [DAC])  Yes  No

If yes, please explain below in a separate attachment:

9. List the names and headquarters locations of any industrial coating contractors your company is affiliated with. An affiliated company is: "A company, corporation, partnership, joint venture, or other business entity operating under a different name than the certified firm, which performs surface preparation or coating application or administrative and other support functions for the certified company; and in which an officer, director, owner, partner or stockholder of the certified firm, a previously certified firm disciplined by SSPC, or the certified firm itself, exercises directly or indirectly (such as through family members) any significant degree of ownership, management or control."

9. Is your company now, or has it in the past, been associated in any way with a contracting firm operating under another name, which has been disciplined by the SSPC under the DAC? A copy of the DAC can be found on SSPC's web site at <http://www.sspc.org/site/cert/PCCP/DAC.html>.

Yes  No

If yes, please explain: \_\_\_\_\_

10. Are any of your company's officers, directors, owners, managing agents, or managers now exercising (or have previously exercised) direct or indirect control, management, or ownership of another contracting firm, which has been disciplined by the SSPC under the DAC?  Yes  No

If yes, please explain

If your company *has not* had such association with a firm previously disciplined under the DAC, please check this box .

**Note:** Failure to answer truthfully or any instance of providing inaccurate information will result in immediate revocation or denial of certification status.

11. Has your company been disqualified or disbarred from any bidder's list in the past 24 months?

Yes  No

If yes, please provide the reason for the suspension and the name of the entity

\_\_\_\_\_

12. Attach copy of most recent (12 months) OSHA accident and illness forms. (OSHA Forms 300 and 300A).

13. Please submit 2 copies of your corporate Health and Safety Plan.

14. Average number of workers you've employed over preceding 3 years: \_\_\_\_\_

15. Is your firm an organizational member of SSPC?  Yes  No

If yes, indicate category of membership:  Patron  Sustaining

Membership Number: \_\_\_\_\_ Date membership expires: \_\_\_\_\_

16. If your company is ISO 9001 certified (or maintains another Quality Management System accreditation), please describe in a separate attachment.

Note: By my Initials and signature below, I acknowledge that I have read and understand:

Initial: \_\_\_\_\_ The QP1 Certification Program Application Form, Instructions, and Program Rules.

Initial: \_\_\_\_\_ The QP1 procedure set forth therein.

Initial: \_\_\_\_\_ The SSPC Disciplinary Action Criteria.

Note: Forms can be found at SSPC's website [www.sspc.org](http://www.sspc.org).

As a principal officer of the contractor, I attest that the company agrees to abide by and be bound by the rules, regulations and procedures set forth therein. (Must be initialed above and signed by the President, Chief Operations Officer or Chief Executive Officer)

Signed:

Printed Name and Title:

Date Submitted:

Certification Fee and Deposit Submitted with this Application: \$

**Note:** Failure to report accurate, complete information will delay your certification evaluation. Omission or falsification of information or failure to answer all questions truthfully will result in withholding or denial of certification status. Your firm will be checked against the provisions of the Disciplinary Action Criteria (DAC). If your firm has critical faults under the DAC and falls under one of its categories of “suspension or revocation,” your application will be held at SSPC for the length of time that is equivalent to the appropriate penalty. If your firm has critical faults and subsequently falls under “warning or probation,” you are under those categories and are subject to further disciplinary action if future problems arise, provided your firm is certified after successfully completing the initial audit.

## Required Information

In order to rate and evaluate your firm, the program uses specific criteria, organized into four business areas outlined below. The Evaluation Checklist in the following Item contains detailed information.

**Management Procedures:** Measures utilized by your company to organize, coordinate, and otherwise manage the various activities required to prepare surfaces and apply coatings properly.

**Technical Capabilities:** Resources maintained by your company to properly interpret and execute job specifications and requirements.

**Quality Control:** Procedures implemented and maintained by your company to verify that all stages of work are performed in accordance with contract documents and specifications.

**Safety Procedures and Recordkeeping:** Practices and procedures used by your company to see that safe operations are maintained.

Each of these four areas contains several subcategories focusing on your company’s policies, personnel, procedures, and resources. **All items must be submitted in writing with the application.** They must be typed on separate sheets of paper and clearly identified. Documents such as charts or file documents, which already exist, must be submitted and identified in the same manner. They should be bound in the order of the evaluation items listed in Section IV, in order to avoid delays processing your application. **All non-public information submitted is treated as confidential.**

The auditor will verify and evaluate thirty-three evaluation items during the on-site audit. The necessary records or files that you must present at that time include but are not limited to: job files for reported projects, job notification forms, inspection logs, equipment and maintenance records, etc. Some information will be presented verbally. The auditor may also evaluate DAC-related items as directed by the Program Administrator.

Item IV lists and describes the thirty-three required items of information. A score of 2 is required on all seventeen (17) critical items.

## IV. Evaluation Checklist

This is a list and description of all items of required information for QP1 certification. Following each item is a statement telling you whether it is a **critical item**. Documentation explaining each item must be submitted with your initial application. **All non-public information submitted is treated as confidential.**

### A. Management Procedures

#### 1. Company Policy

##### a. Mission Statement.

It must contain specific declarations regarding quality control, safety, health, and environmental protection commitments and practices statements. Must be on company letterhead, signed by the President or CEO, updated and reaffirmed annually, and posted at the office and job site.

##### b. Determination of Procedures for Disseminating Company Policies within the Organization. Show that management has implemented procedures to disseminate all policies to workers (e.g., employee manual or handbook, new employee orientation, workforce conferences).

#### 2. Organization and Personnel

##### a. Organization Chart

- Provide a diagram that shows lines of authority and responsibility of key personnel by name and title. The organization chart must be dated and clearly show key positions (e.g., Environmental/Health/Safety (EHS) Officer, QCS, Production Manager). Key personnel must be full time employees of the Contractor and the Chart must be updated and reaffirmed annually.

b. **Job Descriptions.**

For key personnel (e.g., management, quality control, and safety personnel) provide job descriptions that clearly state their responsibilities and duties. Include their work experience, required licenses, and required certifications. Licenses and certifications must be current. Documentation must confirm that actual duties match the job descriptions, and that management training programs are in-place or available and correlate with industry jobs and professions. Officers and management staff must be paid full-time employees of your company.

3. **Administrative and Management Procedures**

a. **Financial Record Keeping.**

Documentation must show a recognized accounting system is in place and that tax returns have been filed in a timely manner (current Letter from CPA firm on file that confirms above, and **a copy of your most recently filed Federal or State tax return with All \$'s obscured**). You must show that liability, workers compensation, and other insurances are paid and current. You must show that employees and workers are paid by your company.

b. **Procedures for Estimating and Scheduling.**

Demonstrate that estimates for work are recorded and that they take into account labor, materials, equipment, training, worker protection, overhead, etc. Written job schedules must be available that clearly outline all major activities (e.g., mobilization, surface preparation, application of primer, topcoat; demobilization, etc.)

Note: Concerning Reporting of Financial Information to SSPC: Contractors may "white out" sensitive financial information. SSPC's interest in reviewing financial documents is limited to verifying legal identification, insurance coverage, and the fact that the applicant follows accepted accounting practices and estimating procedures. The financial information contained on such documents is beyond the scope of the SSPC audit and as such has no bearing on the outcome of the audit.

c. **Procedures for Reviewing Specifications and Other Bidding Documentation (submit with application.)**

Demonstrate that there's a procedure in place, either a checklist or other documentation, that shows that management reviews specifications and inquiry documents, (e.g. project documentation log).

d. **Complying with the Regulations.**

A key person is designated (in writing) to keep abreast of and inform key personnel of EPA, OSHA, DOL, and other regulations affecting the Contractor's operations. There is a history of a key person(s) performing these duties at least 6 months prior to the first audit and routinely thereafter. Current versions of regulations applicable to specific projects are readily accessible by job site personnel. Versions of regulations applicable to general business operations are available at the main office and any division offices.

e. Legal Viability subject to verification at Initial, Full, or follow -up Audits (at discretion of Certification Manager). Production workers are employed or leased by the company, the firm holds current licenses for locales where it operates, appropriate ownership/incorporation papers are available and have been filed with proper authorities, and the federal tax ID statement from the IRS is on file.

B. **Technical Capabilities**

1. **Personnel Qualifications**

a. **Craft Worker Qualification (Critical Item).**

Contractor must implement a worker assessment plan IAW (Appendix A).

2. **Technical Resources**

a. **Industry Group Affiliations.**

Demonstrate that you have affiliation with organizations such as SSPC that provide information on protective coatings technology.

b. **Technical Standards Library (Critical Item).** Key Personnel have access to contracted (job specific) versions of technical standards applicable to the company's operations. Versions of specified technical standards, all PDS, and MSDS applicable to each project are at the job site and available to craft workers, production supervisors, and QC personnel (hardcopy or on-line). Contractors shall maintain a library (hardcopy or on-line) at the home and division offices of current technical standards applicable to its operations (e.g. API, ASTM, CIDs, IMO, ISO, MIL-Specs, NACE, NAVSEA Standard Items, SSPC, etc.) PDSs, and MSDSs.

3. **Procedures (description of procedures used to convert job specifications into a field work orders, job plans, etc.):**

- a. **Job Specifications and Revisions (Critical Item).**  
Demonstrate that specifications and revisions are logged in and distributed to appropriate persons; records are kept of who is given a copy; recipient sign-offs are recorded and filed.
- b. **Procedures for Clarifying Ambiguous Specifications (Critical Item).**  
Show how your company clarifies ambiguous statements, conflicting statements, errors, omissions in contract and specification language, and how clarifications are communicated and documented. Acknowledgement of receipt of those communications by the appropriate person(s) and a record of their resolution is carefully documented.
- c. **Communicating Contract and Technical Requirements (Critical Item).** Demonstrate that your company makes certain that current contract and technical requirements are made available to supervisory personnel at the job site. Acknowledgement of receipt of those communications by the appropriate person(s) is carefully documented. Pre-job and other specification altering meeting notes are formally documented and available at job site as part of contract package.
- d. **For Annual Maintenance Audits in the Office.** The company must produce copies of Job Notifications (JNs) submitted to SSPC for jobs completed or in progress during the previous 12 months. See DAC Section IX. Special Notes.

• **Initial applicants must submit a complete list of current and recently completed industrial painting jobs (previous 12 months) and work experience showing your company's capability to perform work at the level of certification sought.**

Required information for each job includes:

- Facility name, address, including zip code, telephone and fax number, owner's and Prime Contractor's representative in charge of the field operations
- Scope of Work
- Materials applied and approximate quantities
- Equipment used for surface preparation and coating application
- Types (e.g., painters; blasters; helpers) and number of personnel employed in the field
- Special safety (e.g. protection from lead, working at heights, working over water, confined spaces) or environmental (e.g., containment) requirements.
- Duration of project (start date; finish date)

Note: List should include all jobs under contract to your firm regardless of whether all or any portion of the job was subcontracted. Also include work in which you are a subcontractor. Job records for projects reported here are subject to review by the auditor.

4. **Maintenance and Repair of Equipment.**

Demonstrate that you have a Preventive Maintenance Program (PM), which shows that you perform maintenance and repairs on equipment used in surface preparation and coating application operations according to the equipment manufacturer's recommendations. You must show that you have documentation of the completion of maintenance according to your PM Plan.

Note: Repairs as a result of equipment breakdown are not considered PM.

## C. Quality Control (QC)

### 1. Personnel Qualification: Demonstrate that personnel supervising and performing Quality Control related functions Are Qualified (Two Critical Items).

#### A) Qualifications of the QCS (see Appendix B attached):

- A full time employee designated in writing (e.g. organization chart, QCS job description, or letter) as the Quality Control Supervisor (QCS).

#### Training and Experience of the QCS:

- Successfully complete formal training in Quality Control/Quality Management Systems and Coatings inspection. Acceptable formal Quality training includes the SSPC QCS course or equivalent accepted by the Certification Manager in advance of the Audit.
- Acceptable (minimum) formal coating inspection training includes: SSPC (PCI, NBPI, BCI), KTA (Level 1), GPI (Level 1), NACE (CIP Level 1), Frosio
- At least 3 years of full-time field experience in Industrial/Marine Coatings
- Hold valid certifications and licenses where required

#### Primary Duties and Responsibilities of the QCS:

- Ensure that contractor uses qualified personnel for QC
- Ensure that proper inspection forms and recording procedures are used for job quality monitoring
- Ensure correct and properly operating and calibrated equipment is used.
- Review and sign off DIRs on a timely basis (QCS must sign off or authorize review of DIRs by other competent QC personnel)
- Ensure that work is inspected for conformance with contract requirements, good painting practice, and internal QC procedures.
- Ensure that nonconforming work and rework is properly documented.
- Develop and/or review Inspection and Test Plans.
- Conduct and/or review Internal Audits.

#### B) Qualification of Quality Control Inspectors (see Appendix B attached):

Formal training: Acceptable coating inspection training programs include: SSPC (PCI, NBPI, BCI), KTA Level 1, GPI (Level 1), NACE (CIP Level 1, Frosio) or equivalent formal in-house inspection training. In house training must be accepted by the Certification Manager (24 hour minimum curriculum, 8 hours of practical instrument training, etc., see Appendix B). Qualifications of instructors must meet formal training requirements above. Curriculum, attendance sheets, written exams and scores are on file and available for review. The QC Inspector must have at least 2 years of full-time field experience in Industrial/Marine Coatings QC or related work. When required by contract, all licenses and certifications must be valid and available for verification.

Notes: QC personnel must have access to all specification and/or contract invoked written and/or visual standards (e.g., SSPC, ASTM standards). Conforming and non-conforming work is reported to management. Written authority can be in the form of a site-specific job plan, or a job description or an authorization letter, or in a company QC plan.

#### C 2.a. Written QC Authority from Executive Management:

QC Inspectors must have written authority to perform QC duties to include continuous improvement of all QC internal procedures ((e.g. organization chart, QCS job description, or letter).

### **C.2.c. Identifying Nonconforming Work and Specification Deviations (Critical Item).**

Provide written documentation of your procedures to check for nonconforming work daily and to stop work, if non-conformities are found. Produce documentation that nonconformities are recorded and reported. Show that required rework is performed. Show documentation of deviation requests that state the nature of the deviation, authorization by the appropriate person to make the change, and the technical justification for the deviation.

***Daily Inspection Reports (DIRs) must record project relevant observations of:***

- compressed air cleanliness
- dry film thickness (measured and documented for each coat and according to the contract)
- air temperature (dry and wet bulb)
- relative humidity
- dew point
- substrate surface temperature
- abrasive cleanliness
- surface preparation cleanliness specified and achieved
- surface profile specified and achieved
- illumination of work area (foot candles for surface preparation, coating application, and inspection). See SSPC Technology Guide 12.
- batch numbers of coatings and thinners
- mixing of coatings (quantity, mix numbers, satisfactory or unsatisfactory (for mixes witnessed))
- DFT readings for each applied coating meet specification requirements.
- DFT readings for specifications requiring SSPC PA 2 are properly documented and meet specification requirements.
- inspection instruments used (manufacturer, model, and serial number)

***Note: DIRs must be signed and dated by Inspector and formally reviewed by QCS or other designated and competent QC personnel.***

***Final inspection records must be retained for 3 years after project completion (unless a longer term is required by contract).***

### **C.2.e. Inspection Plans/Hold or Checkpoint Inspections.**

The Contractor shall have written procedures to convert awarded contracts into field work orders, job work plans, instructions to craft workers, etc. Quality Control Programs and procedures shall specifically define quality control methods and criteria as required by 3.3.2 of QP1. Inspection and Test Plans: There are written company or contract specified procedures for verifying that coating and related operations are performed IAW contract requirements and industry best practices and are available on site. Hold Point Inspection: There are procedures to perform and document hold point inspections, daily or IAW contract requirements, available to on site personnel, and used to perform in-process inspections of work at key hold/check points. At a minimum, the follow hold point inspections shall be performed and documented:

Major Operations:

- surface pre-cleaning
- surface preparation
- primer application
- intermediate coat(s) application
- finish coat application
- cure testing (when specified)

Note: This must be a written procedure available on the job site.

### **C.2.f.: Corrective Action Procedures**

The Contractor shall document actions taken by management to eliminate recurring nonconformities. These actions include identification of the root cause of recurring nonconformities, implementing changes to company procedures to improve production, and follow-up to ensure implementation has been effective.

## D. Safety Procedures and Record Keeping Systems

### 1. Safety Program and Documentation of Safety Education, Meetings, and Other Safety-Related Activity (Critical Item).

You must have a written Safety and Health compliance program based on current OSHA or equivalent standards that are applicable to your operation.

At a minimum, the program must address the following general topics and applicable sub topics:

- Hazardous Materials
- Personal Protective Equipment (e.g., Eye, Ear, Face, Foot, Body, Hand protection)
- General Safety and Health Provisions
- Occupational Health and Environmental Controls, as applicable to the coating industry.
- Personal Protective and Life Saving Equipment
- Fire Protection and Prevention
- Signs, Signals, and Barricades
- Materials Handling, Storage, Use, and Disposal
- Hand and Power Tools
- Welding and Cutting, if applicable
- Electrical
- Scaffolds
- Fall Protection
- Cranes, Derricks, Hoists, Elevators, and Conveyors
- Ladders
- Toxic and Hazardous Substances
- Airless Injection
- High Pressure Water Jetting (HP WJ)
- Integrity of Pressure Vessels
- Abrasive Blasting Hazards

You must show that safety activities (e.g., employee safety education/training sessions; routine job site safety and health inspections, tool box safety meetings, along with distribution of safety materials and literature) are routinely performed and documented. You must show evidence that safety performance is part of each field manager's written job description. Ownership or management must also review the safety and health program at least annually (to evaluate whether the goal of protecting workers at all work sites is being achieved). The program must be approved by a CIH, CSP, or Safety Professional with at least five (5) years, full-time experience as an HSO in the industrial/marine coating industry, at least once every three (3) years and when changes in processes used or changes in applicable regulations take place.

### 2. Pre-job Safety and Health Hazard Analysis (JSA)

Demonstrate that the corporation's safety officer or a designated safety provider conducts a pre-job hazard analysis (JSA) for each job. You must submit documented evidence of such an analysis on your three most recent jobs.

### 3. Accident Report Procedure

Contractor has a written accident and near miss reporting procedure, which includes actual reports showing how accidents and near misses are investigated. The procedure will have plans and actions to perform root cause analysis and change procedures and practices to prevent recurrence. Accident reports address what happened, to whom, where it happened, how it happened and the root cause.

### 4. Procedure for determining proficiency of safety and loss control measures firm uses

Show how your company monitors results annually. Submit a copy of your 3 most recent worker compensation experience modification ratings (EMR) for states/provinces your firm works in. Submit evidence of EMR, on worker compensation insurance carrier letterhead. Also calculate your company's most recent incidence rates for "total cases" and "lost workday cases" as defined by U.S. OSHA. Also include copies of most recent safety audits conducted by outside agencies such as your insurance or bonding company or safety consultant. Such audits will be treated as confidential information.

### 5. Safety Procedures for Specialized Equipment (Critical Item).

- a. Show that safe operation of equipment is ongoing in your company. Include written safe operating procedures (SOPs) for major equipment, and demonstrate that they are available at the job site. Provide evidence that employees, and those working under your direction, operating equipment have been trained to operate equipment safely.
- b. Show that owners and/or managers have approved these procedures, and that the contractor's safety director or designated safety professional has reviewed these procedures at least annually and documented the review.
- c. Show evidence that these procedures incorporate equipment manufacturers' recommendations for safe operation.

6. **Provision and Maintenance of Personal Protective Equipment (PPE) (Critical Item).**
  - a. How is (PPE) equipment issued and maintained? Demonstrate that PPE issued is appropriate and adequate for hazards encountered on the jobs you've undertaken.
  - b. As part of your comprehensive Health and Safety Program, you have a written respiratory protection program based on OSHA regulation, 29 CFR 1910.134, or equivalent regulation or standard.
  - c. Show written procedures for issuing and use of other PPE, such as protective clothing for skin protection, devices for eye protection, devices for hearing protection, foot protection, head protection, life jackets, life saving equipment, (as applicable).
  - d. Show that required respirators and protective equipment are available to personnel at the job site and used IAW the company Safety Plan and applicable MSDSs.
  - e. Provide evidence that workers who use respirators and PPE, are trained in their use and care.
  - f. Demonstrate existence of a formal system to check the effectiveness of PPE used on site and action taken to maintain PPE used on site in good working condition.

7. **Availability of first aid trained employees**

At least one person is available on each job site that has had current first aid and CPR training certificates issued by the Red Cross or an equivalent organization. This is applicable to all projects that last 2 or more days. A crew of 6 or more will require a back up first aid and CPR trained person.

8. **Non-Compliance with Regulations (Critical Item).**

Records are kept of your company's non-compliance with regulations, (e.g., Worker Safety and Health, Environmental Compliance, Worker Compensation rules, Wage and Hourly rules) and there is documented evidence that corrective action is taken to avoid repeat violations.

9. **Sources of Safety Information.**

Contractor has corporate procedures to provide job site access to relevant EHS information (OSHA, EPA, etc.) and equipment.

**V. QP-1 Fee Schedule (In U.S. Funds)**

Effective August 2008

Admin Fee	Sustaining Member	Patron Member	Non-Member
QP1 Initial and New Term	\$2,100	\$2,400	\$2,700
QP1 Maintenance	\$2,100	\$2,400	\$2,700
QP1 Corrective Action Verification	\$300	\$550	\$800

Firms applying for certification must submit with their application the annual administrative fee plus deposit for audit expenses. Determine your audit expense deposit from the following:

**Audit Deposit**

Initial and New Term Audit	\$2,600
Annual Maintenance	\$2,000
*Outside US/Canada/Mexico – Add	\$1,000

Example: If you are applying for initial QP 1 certification and you are a SSPC patron member, submit \$5,000 (\$2,400 Administrative Fee + \$2,600 Anticipated Audit Expense).

- Audits are performed at cost. If your audit expenses are less than the deposit you submit, SSPC will refund the difference. If expenses are higher, SSPC will bill you for additional expenses.
- Fees must be paid in advance of the audit. Certification will be withheld until all post-audit expenses are paid. Post audit fees for QP 1 deficiency audits or additional audit expenses are payable when due. Failure to pay these fees in a timely manner can result in a six-month suspension from the program and public notification of the suspension. If fees are still not paid after the suspension, the contractor will be decertified.
- Note: The fees cover the cost of staff time to review and process your application package and submittals, and fees and expenses for the on site evaluation, and associated overhead costs required to operate the PCCP. Program fees are non-refundable regardless of the results of the evaluation. SSPC will withhold \$500 for application processing expenses if a firm decides to withdraw its application prior to scheduling of the field evaluation.
- "Non-responsive" and "inactive" applications will be returned to the applicant, less a \$500 non-refundable administrative processing fee after six months of inactive status.

## **VI. Submittal Procedure**

To avoid delay and/or confusion, gather and submit application package materials as follows:

1. Type or clearly print all entries on the application form.
2. Be certain all items on the form are answered completely and accurately.
3. Send the original and one copy of the application package to SSPC. Keep a copy on hand for your use at the on-site audit.
4. Clearly identify the submittal items included with the application. Secure all pages to minimize chances of loss or separation. Organize submittal items in the order listed in Section IV.
5. Determine and send the non-refundable certification fee/deposit using the fee schedule described in Item VI. Make check payable to: SSPC Painting Contractor Certification Program.
6. Mail the entire application package to:  
US MAIL AND DELIVERY SERVICE ADDRESS  
SSPC: The Society for Protective Coatings/ ATTN: Certification Manager  
40 24<sup>th</sup> Street – 6<sup>th</sup> Floor  
Pittsburgh, PA 15222-4656

## **VII. Evaluation Process**

Evaluation of your firm is performed in conformity with the current version of SSPC-QP1: Standard Procedure for Evaluating Qualifications of Painting Contractors: Field Application to Complex Structures and the QP1 audit evaluation checklist. The audit evaluation checklist is available on the SSPC web site, [www.sspc.org](http://www.sspc.org).

The application package (e.g. application form, written submittals, certification fee) is received by SSPC. Upon acceptance of the application and submittals by SSPC, the application package is forwarded to the SSPC auditor to schedule the initial audit.

When a date or time frame has been selected for the office visit, mutually agreed upon, and confirmed in writing or verbally by you and the SSPC auditor, a program auditor will visit your office and job site(s) to perform the following: (As stated earlier, the job site visit may take place before or after the office visit and may be unannounced or done on short notice.)

Note: At least one active job site must be observed for the audit to be complete.

During the field and office audits, the auditor will:

- Confirm data submitted in the application package.
- Interview key supervisory personnel.
- Observe and rate company organization and operation (including field operations), using the standard program guidelines and rating procedures.
- Examine and rate equipment and facilities.
- Schedule Exit Interview

At the conclusion of the site visit, the auditor will schedule an exit interview with your supervisory or management personnel to review the audit and point out items (i.e. Deficiencies) that were scored less than 2 and items scored 2, which require a corrective action report. If there are any deficiencies or corrective actions, the auditor will fill out a deficiency schedule for your representative to sign at the conclusion of the audit. Your representative's signature does not connote agreement with the results. It only confirms that you have been made aware of the results. Refusal to sign the deficiency schedules results in denial of certification.

If the Contractor chooses to appeal Audit Findings, they must notify the SSPC Certification Manager, in writing, within 10 working days of the Audit Exit Interview.

### **A. Cancellation of Audit Policy**

After the on-site office audit date has been selected, mutually agreed upon by both you and SSPC, and confirmed in writing or verbally, if you cancel the audit or request a change in the date that fails to make the job site selected by SSPC available for auditing, you will be responsible for any expenses incurred by SSPC as a result of the cancellation or rescheduling.

### **B. Critical Item Provision**

The QP1 critical item provision identifies 17 (of the 33 total) evaluation items program auditors use to evaluate contractors for certification. SSPC has deemed these 17 critical to the annual certification maintenance of a contractor. The provision requires the contractor to score a minimum of two (2) on a scale of 0 to 3, on all 17 critical evaluation items or certification can be withheld.

The PCCP provides a 90 day-period for applicants who have not attained an adequate score to: make corrections in the deficient areas, submit a corrective action plan to change system procedures, and ask for a reevaluation. That same 90-day period is available to program members unable to achieve the required minimum score on all 17 critical evaluation items during annual on site maintenance or follow up evaluations.

For initial applicants, SSPC can withhold certification until: corrections are made, required procedures are put in place a minimum of six production months prior to the follow up evaluation, and the passing score is achieved during any follow up on site evaluation.

For program members unable to achieve the required score during an annual on site maintenance evaluation (which consists of an evaluation of all 17 critical items), SSPC will provide the member 90 days to submit a corrective action plan and request any required follow up evaluation.

If a program member is deficient in no more than 2 critical items upon completion of the annual maintenance evaluation, SSPC will extend certification status until the follow up evaluation is completed, pending acceptance by SSPC of a written corrective action plan. If the program member is deficient in more than 2 critical items, this shall be cause for SSPC to suspend certification status for up to six months, pending receipt and acceptance of a written corrective actions and any required verification through a follow up Audit. If submission of a required CAP is not received (or post-marked) by the established deadline, the QP1 can be suspended. If a required corrective action is requested a second time and still not provided by this second established deadline (verified by any required follow-up Audit deadline), decertification will result.

**Note: Refer to the Special Provisions section for information regarding Joint Ventures and Auditing.**

#### **C. Critical Evaluation Items (17 total)**

- Procedures for securing and evaluating applicable regulations (Item A.3.d)
- Qualifications of quality control supervisor (Item C.1.a)
- Assessment of craft workers (Item B.1.a)
- Availability of technical standards (Item B.2.b)
- Recording of job specifications and revisions (Item B.3.a)
- Procedures for clarifying ambiguous specifications (Item B.3.b)
- Procedures to communicate contract and technical requirements (Item B.3.c)
- Qualifications of quality control inspectors (Item C.1.b)
- Written authority of quality control personnel (Item C.2.a)
- Identification of non-conforming work (Item C.2.b)
- Documentation of inspection results (Item C.2.c)
- Availability of inspection equipment and calibration verification standards (Item C.2.d)
- Procedures for verifying proper surface preparation and coating application (Item C.2.e)
- Written corporate worker safety and health program (Item D.1)
- Safety procedures for specialized equipment (Item D.5)
- Availability and use of personal protective equipment (Item D.6)
- Maintaining records of non compliance with regulations and follow up actions (Item D.8)

#### **D. Determination of Status**

At the conclusion of the evaluation process described in Part IV, the SSPC designated Program Auditor will report audit findings to the SSPC Certification Manager. The SSPC Program Administrator will make the final decision regarding your status. Those decisions are either:

1. Confer Certification: Your Company achieved required scores in the four function areas and scored 2 or better on all Seventeen Critical Items.
2. Deny Qualification: Your firm has not attained a score adequate to achieve QP1 certification. You then have 90 days after written notification of audit results to submit an acceptable corrective action plan to address deficiencies and request that SSPC re-evaluate to verify implementation of your corrective action plan.

#### **E. Appeal Procedure**

During the Audit Exit Interview, the Auditor will document and explain all deficiencies cited during the Audit. If you dispute any of the audit results, you may appeal, using the steps of recourse listed below.

1. You must notify the SSPC Certification Manager in writing within 10 working days of the Exit Interview, specifically identifying the deficiencies you are appealing, and substantively explaining why you dispute them (this includes providing supporting documentation for each deficiency being contested).
2. SSPC will evaluate your written appeal and notify you of the evaluation results (in writing) and within 30 calendar days of the appeal submission receipt by SSPC. SSPC appeal evaluations will result in either acceptance of your

written appeal (vacating or reducing an audit deficiency) or denial of the appeal (sustaining the deficiency). For a denial of any appeal, the Contractor has the option to accept the SSPC appeal resolution and submit a Corrective Action Plan (CAP) which may or may not require a follow up Audit to verify CAP implementation. Finally, an appeal denial by SSPC could also result in a QP suspension up to 1 year.

3. The Contractor can continue the appeal process by requesting an informal conference in writing and within 10 business days of an appeal denial by SSPC. The informal conference will be held at SSPC headquarters in Pittsburgh (for Contractor to further explain its position and request a settlement)
4. The final option for the Contractor wishing to continue with the appeal is to utilize the existing Disciplinary Action (DAC) Arbitration Panel Procedure.

**Note:** Contractors who do not appeal audit findings can still appeal disciplinary action taken by SSPC as a result of failing an audit. Use procedures 1-4 above to appeal a suspension resulting from a failed audit.

An annual internal audit will be required in each in each year of certification after initial certification. SSPC will supply an internal audit form, which you can use to perform your internal audits.

Customers will be given an opportunity to comment directly to SSPC at any time on your company's performance. All replies will be treated as confidential and may be used only as a component in determining certification reconfirmation or verification of critical faults under the DAC.

Failure to pass the aforementioned annual or unannounced follow-up audits will result in suspension of your company's certification status. See Item H, "Maintenance Applications" for specific rules governing maintenance of QP 1 certification status after initial certification.

**IMPORTANT:** Failure to cooperate with the program auditor or SSPC Certification Manager, or failure to provide access to data, personnel or on site premises, shall be sufficient cause for denial, suspension or revocation of your firm's certification status at the Program Administrator's discretion.

## VIII. Maintenance Applications

The SSPC QP1 certification term is three years. To assure that your operations remain in compliance with certification standards during that period, the program requires that SSPC evaluate your firm at least once in each of the second and third years of the term. The evaluation may be announced or unannounced. Additional audits may be performed at SSPC's discretion, at no cost to the program member.

To maintain uninterrupted certification status, you must reapply for certification annually. You must submit a maintenance application, a signed internal audit report completion statement, list of applicable (i.e. complex industrial structure) work in progress and completed since the last evaluation, current safety information and maintenance fee by the January 15 due date. The necessary forms and applications can be found on SSPC Online at [www.sspc.org](http://www.sspc.org). Click "certification" and follow the appropriate links.

SSPC will make every effort to send you a letter approximately 60 days before the January 15 submittal due date as a reminder to reapply. If you fail to reapply when your submittal is due, your company's certification will expire and your firm will be decertified. SSPC will send a letter to any contractor who has failed to reapply as a reminder that certification has expired. Note: You are responsible for ensuring that SSPC has your current mailing address, phone and fax numbers, etc. Failure to receive a reminder letter from SSPC does not relieve you of your responsibility to submit your renewal application when due.

Once you have reapplied, the annual evaluation (complex industrial structure job site and possibly office visit) must take place within the calendar year or your certification will expire. Note: Job records for projects reported in the annual submittal and those for which a job notification is on file are subject to review during a maintenance audit and should be available if the auditor asks for them. Note that it is mandatory to show the auditor an active job site during the annual audit. SSPC reserves the right to audit any project being performed by an SSPC QP Certified contractor that involves surface preparation or coating application or hazardous paint removal or any combination of the three processes being conducted by the contractor on an industrial structure. Such projects are eligible for an SSPC audit regardless of whether: (1) the job is "reportable" or; (2) whether the project requires QP certification or; (3) whether there's a formal coating specification or written contract in place for the work. If you are unsure whether a project you are performing is eligible for an audit, please contact the SSPC Certification Manager for clarification. If you have active work and have not been audited prior September 1, you are obligated to inform SSPC so the audit can be conducted to avoid a situation where you have no work to show for the annual audit. Contractors who have no active work face loss of certification.

Important Note: SSPC reserves the right to suspend Contractors who fail two consecutive certification maintenance / annual audits at any time while certified (corrective action verification audits following a failed audit are not considered maintenance / annual audits) for UP TO 12 months following failure of the second audit.

Contractors who fail the annual maintenance evaluation will be given 45 days after notification of audit results to submit a Corrective Action Plan and request that SSPC re-evaluate. SSPC reserves the right to withhold certification from firms who fail a maintenance or follow-up evaluation until a Corrective Action Plan (CAP) is submitted and accepted by SSPC. [SSPC may opt, in certain cases, to extend the company's certification status following acceptance of a CAP for a limited period subject to certain conditions.]

Contractors or Shops placed on suspension for failing a maintenance audit during their certification term will be formally notified in writing (e.g. by letter or email) of the suspension.

1. The contractor is given 45 days from notification to make corrections and submit an acceptable corrective action plan and be re-audited,
2. The contractor is asked to return original certificates, and
3. The contractor is asked not to present itself as a QP certified contractor during the suspension period

During a suspension period the contractor's name will be removed from SSPC's web site list of QP certified contractors (<http://www.sspc.org/certification/PCCP/PCCPforms.html>). Contractors will be formally notified in writing when a suspension is lifted, valid certificates will be reissued, and the contractor's name will be added back to the web site list of QP certified contractors.

Note: If selected, contractors in the Random Audit Program (RAP) will undergo an audit. However, they are exempt from the mandatory annual evaluation during their RAP eligibility period.

## **IX. Special Provisions**

### **A. Major Changes in a Company's Organization**

SSPC certified contracting firms are required to notify the SSPC Certification Manager or Program Administrator in writing within 30 days of any major organizational or name change. Examples of a major change include, but are not limited to, the following:

- change in ownership
- partnership/joint venture arrangement- or change in existing partnership status
- change in executive management (e.g. President, CEO; General Manager)
- declaration of bankruptcy
- incorporation or change in corporate status
- name change
- becoming a subsidiary
- change to sole proprietorship
- Relocation of main or branch business offices or opening of new branch offices

The notification shall include the following information:

- specific details about changes
- revised organizational and responsibility chart
- effective dates of change
- names of officers of reorganized company
- any change in tax identification/EIN number, federal or state. (Submit statement from IRS or Secretary of your state assigning new Tax I.D./EIN.)

Note: If a company changes federal or state tax I.D. numbers or is incorporated in a new state, it will automatically have to reapply as a new company. If it is a simple change of name (i.e., John R. Doe Co., Inc., to J.R. Doe, Inc., or a change in location) incorporated in the same state with the same tax I.D. numbers, a simple transfer of certification can be authorized after review by the Program Administrator.

SSPC will subsequently schedule a special audit, at the contracting firm's expense, within 60 days of notification. SSPC will also schedule another audit, at the contracting firm's expense, within 6 months after the special (first) audit to verify that the reorganized company is in fact maintaining the standards of the program. If the company does not pass the 6-month audit, certification will be rescinded.

No transfer of certification status to a new company will be approved until the company provides SSPC with any required or requested information and passes the special (first) audit.

Failure to notify the program administrator of any major changes within the required time period can result in an automatic 6-month suspension.

A company, which has changed its name or has otherwise reorganized must certify in writing that it will assume responsibility for any disciplinary actions or violations of federal, state and local regulations. In addition, any violations of the SSPC PCCP program (e.g. written complaints from owners or critical faults) by the firm under its original name will be considered as part of the record of the firm under its new name.

A company submitting a change of organizational status can request that SSPC waive the requirement for a special (first) audit before approving any transfer. SSPC will evaluate each request and may waive the requirement at its own discretion. Requests to have the audit waived must be submitted at the time of notification of the organizational change.

### **B. Suspension for Non-Payment of Fees**

Failure to pay all fees in a timely manner will result in a six-month suspension from the program and public notification of the suspension. SSPC will notify a firm of its suspension if it fails to respond within (3) three business days to the final (second) notice of non-payment. SSPC will also withhold issuing certification for initial and annual renewal applicants who pass the evaluation but still have fees due.

### **C. Formal Complaint Procedure**

Any authorized representative of an owner who hires a QP1 certified painting contractor could file a formal complaint against the contractor if the representative has information that the contracting firm does not practice QP1 certification procedures. The contractor may respond to the complaint by submitting information supporting its position to SSPC.

#### **D. Subcontracting Work**

SSPC certified contractors are responsible for the actions of subcontractors, to ensure they perform in accordance with PCCP requirements. Contracted tasks include (but are not to be limited to) environmental monitoring and testing; personal monitoring; medical surveillance; cleaning, surface preparation and painting; erecting and moving containment and scaffolding; and equipment maintenance.

The Contractor will control its subcontracting process to ensure that its subcontractors conform to PCCP quality management requirements. The Contractor shall evaluate and select subcontractors based on their ability to provide products/service in accordance with the contract and PCCP quality management requirements

Purchasing documents sent to the subcontractor shall specify information describing the product or service being purchased. The contractor shall ensure that specified requirements are adequately defined in the purchasing documents prior to their release to subcontractors. Subcontractors must also be notified by you, the certified Contractor, that SSPC holds the right to audit their surface preparation and coating application operations.

In all circumstances, SSPC certified Contractors should hire only SSPC certified subcontractors for surface preparation and coating application work. SSPC certified Contractors MUST hire SSPC certified Contractors as required by the facility owner.

SSPC realizes that there are circumstances when you are hired because of your credentials as an SSPC certified contractor and yet are required to hire painting subcontractors, as part of your contract, that may not be certified (e.g., minority or set aside contracts). In cases when you do hire non-certified sub-contractors to fulfill a contract obligation which cannot practically (or reasonably) be met by the contractor or other PCCP certified subcontractor, you will need a written waiver of the QP requirement for the subcontractor from the facility owner or contract administrator. Regardless of the subcontractor's certification status, you are still responsible for the actions of those subcontractors to ensure they perform in accordance with your QP quality programs.

All subcontractors hired by SSPC certified Contractors must be formally approved in writing by the facility owner or its official representative. Failure to comply will result in issuance of a "SEVERE" critical fault under the DAC.

If a certified Contractor's job site is audited and one or more of the painting subcontractors performing surface preparation and coating application work at that job site are not in compliance with QP requirements, SSPC will issue the certified Contractor a warning for violations of the PCCP Subcontracting Special Provision. A second incident will result in an automatic 12-month suspension from the certification program.

SSPC certified Contractors who hire non-certified contractors even though the facility owner, general contractor or specifying engineer specifically call out in their contract or general notice to contractors that all cleaning and painting subcontractors must be SSPC certified, will be subject to disciplinary action (e.g. deliberate violation of specification requirements - a "severe" violation resulting in suspension) under the Disciplinary Action Criteria (DAC).

If a certified contractor utilizes another contractor's workers (e.g. applicators, blasters, helpers, tenders, quality control inspectors, competent persons, etc.) and these workers are paid by another entity (regardless of whether they are under your direct supervision), the workers are considered to be subcontracted from the other entity. If the contract calls for a QP 1 or QP 2 contractor, the other entity must also be certified or it is considered a violation of the DAC.

If a certified contractor is borrowing, leasing, renting, etc., workers, and those workers are on the certified contractor's payroll, and under the certified contractor's direct supervision, the workers are considered employees of the certified company.

Complaints concerning SSPC certified Contractors allegedly violating subcontracting practices described above will be investigated by SSPC and may result in an unscheduled audit of job records and/or job site.

#### **E. Joint Ventures and Auditing**

When SSPC audits a project being done by one or more QP certified firms as a Joint Venture (JV), the audit counts as an audit for all the QP certified companies involved in the JV. That is, if the audit is successful, all the JV QP companies audited share in the success. If the audit is not successful, the audit is unsuccessful for all QP firms involved. In addition, SSPC reserves the right to audit a non-JV project being done by one or more of the joint venture contractors.

**F. Reporting Work and Citation History on Application**

Contractors are responsible for the accuracy and completeness of reporting of regulatory citation history information submitted to SSPC when completing a certification application. Failure to accurately report this information on the application will delay the application or result in a disciplinary action or if the company's already certified, will result in suspension of the firm's certification.

**G. Administrative Suspension and Change of Company Name**

Change of company name, ownership or structure does not void a suspension issued by SSPC. Any company that is suspended for failing to meet QP audit standards, SSPC administrative policy, or any other policy related to QP certification is restricted from reapplying for certification as a newly formed, merged, or renamed company. Recertification in any form is prohibited for the stated duration of the suspension. Once the suspension period has lapsed, any suspension history and records will be transferred to the new business.

Any representative of the management, including but not limited to an officer, director, superintendent, quality control supervisor, safety director, general manager, or stockholder, or any person who exercises directly or indirectly, including through an intermediary person, any degree of ownership, management or control of the suspended contracting firm, who forms or purchases a new company or who exercises any management or control of a new, existing, or purchased company, or who exercises any degree of ownership of a new, existing, or purchased company, renders the new, existing, or purchased company ineligible for certification while any suspension of the company the person was associated with, is in effect. The intent is to prevent management, or other key individuals associated with the suspended firm from forming or purchasing a new company, or exercising any control over an existing affiliated company (such as through an intermediary person) to avoid the consequences of a PCCP suspension.

A suspended contractor may re-enter the program when the suspension period has lapsed and the conditions for reinstatement have been met. A newly formed, merged, renamed, or otherwise reorganized company must submit an application and follow all procedures for QP certification.

Note: For purposes of this document, affiliated company is defined as: "A company, corporation, partnership, joint venture, or other business entity operating under a different name than the certified firm, which performs surface preparation or coating application or administrative and other support functions for the certified company; and in which an officer, director, owner, partner or stockholder of the certified firm, a previously certified firm disciplined by SSPC, or the certified firm itself, exercises directly or indirectly (such as through an intermediary person or family member) any significant degree of ownership, management or control."

**X. Random Audit Program (RAP) (QP1 and QP2 only)**

**A. Contractor Eligibility Requirements for the Random Audit Program:**

1. The Contractor must successfully complete the most recent 3-year certification term. That is, the contractor must pass the initial and two subsequent QP1 and QP2 reconfirmation Audits and any subsequent Audits. During the course of the above Audits, a Contractor must not have received a rating less than 2 for any critical evaluation item or receive more than 4 ratings below a 2 on any non-critical evaluation item in the QP1 program; or any deficiency requiring a Major Corrective Action Report (CAR) or more than 4 deficiencies requiring a Minor CAR in the QP2 program. Note: The RAP is applicable to both QP1 and QP2 certifications. Some firms may only qualify for RAP under one program.
2. Establish a record free of disciplinary actions, defined by the Disciplinary Action Criteria (DAC), during the certification term.
3. Operate without any major changes in company organization as defined in the QP1 Special Provisions during the course of the Contractor's most recently completed 3-year QP1 certification term or any part of a subsequent uncompleted term. A contractor may change its name (this is not a major change) but it must meet the criteria listed in Special Provisions for such an action.

**B. Loss of Eligibility for the Random Audit Program**

1. If a Contractor fails any certification or random audit (i.e., does not achieve a passing score or is rated less than 2 on any QP1 critical item or less than 2 on 4 or more non critical items; or is cited for any deficiency requiring a Major Corrective Action [CAR] or 4 or more deficiencies requiring a Minor CAR under the QP2 program). Note: Contractors who fail a random audit must submit an accepted corrective action plan within 45 days of notice and undergo a "full" audit in order to be considered for reinstatement of certification status.
2. If a Contractor undergoes a major organizational change that requires a change in Tax I.D. or EIN.
3. If SSPC assesses any disciplinary action against a Contractor (determined by the DAC).

4. If a Contractor voluntarily discontinues or disrupts its certification status (e.g., failure to meet an application or submittal deadline; failure to pay fees or expenses when due).
5. Declaration of Bankruptcy.

**C. Restoration of Random Audit Program Eligibility:**

1. Successful completion of a new 3-year term (see A.1. above), will begin with a full audit in the year following loss of RAP status.
2. Pass a special audit following a major organizational change.

**D. Duration of Random Audit Program Eligibility (3 years):**

1. A Contractor is subject to random audit in any of the three years that it is in the random audit program.
2. A Contractor must pass a full audit (all items on the checklist) in the fourth year to be eligible for a new 3-year term in the random audit program.

Note: Random reconfirmation audits consist of (at a minimum) an on-site evaluation (at an active job) and a visit to the corporate offices to verify compliance with certification program requirements.

**E. Application for RAP Eligibility**

1. Applications for RAP are due on October 15 for the following calendar year.
2. Application: Simply submit a letter requesting consideration for entry into the RAP program and include copies of your three most recent SSPC audit summaries and corresponding deficiency schedules. Determination will be made no later than January 15. Requests submitted after October 15 will be denied.

**XI. Scoring**

The SSPC auditor rates your company on all applicable\* evaluation items. Only findings rated 1 or 2 are reported on the deficiency schedule, which is given to the auditee at the closing interview. Lack of a finding for an evaluation item means that the auditor rated it "3," or did not rate the item.

\*More items are evaluated on initial and full audits than are evaluated on maintenance, spot-check or corrective action follow up audits.

Below are the ratings and what they mean.

**The rating of 1**, (a.k.a. a major CAR or deficiency), indicates: (a) the required training, written program, practice or procedure is non-existent; (b) the required training or written program is inadequate; or (c) the required practice or procedure has not been in place for the minimum amount of time (six consecutive production months) or it has been in place sporadically (e.g., less than 2/3 implemented).

Important Note: Typically, auditors will not issue major deficiencies for isolated breakdowns in a contractor's Quality System. However, there are exceptions: For example, auditors will issue a rating of "1" when they observe one or more safety violations or safety hazards that could result in an injury or serious incident. An obvious example would be a person working without appropriate fall protection as required by the contractor's safety and health plan and/or governing regulations. Auditors will also issue a rating of "1" if they discover one or more unauthorized deviations from contract requirements or deviations from good painting practices found in the paint shop, shipyard or field job site.

**The rating of 2**, (a.k.a. a minor CAR or deficiency), indicates the training or written program is adequate but requires minor revision. Examples include a practice or procedure that is in place with isolated instances of non-conformance (no more than 1/3 of the time), lack of practice or documentation due to personnel turnover, non-performance by field personnel, personal hardship, and natural disaster.

**The rating of 3** indicates that a contractor, based on audit sampling, consistently adheres to specific training and written program requirements, and required practices and procedures consistently meet the letter of the standard. When there are no audit findings, it means that all items evaluated during the audit were rated "3".

**Corrective Action Report**

A Corrective Action Report (CAR), using the SSPC CAP form found on the SSPC web site (<http://sspc.org/certification/PCCP/CAPinfo.html>), is required for each major deficiency (rating of "1") found by the auditor. Remedial action for a Major CAR requires the submission of a corrective action report followed by an on-site audit to confirm that the contractor has corrected the deficiency and implemented the corrective action plan submitted

to SSPC. Remedial action for a Minor CAR requires that the auditor confirm remediation at the next audit. Minor CARs that are not remediated by the contractor by the next audit turn into a Major CAR or deficiency.

Note: Initial Audits require corrective action report submission for all deficiencies cited (major or minor).

**Concerns** - Occasionally, the auditor will note a “concern” on an audit report. A concern is not a rating. It is simply a statement for the contractor to consider for its own business purposes. No response is required for a “concern.”

## **Section XII: QP1 Appendix A**

### **A. GENERAL DESCRIPTION**

In order to meet the requirements of QP 1 section 3.2.1(a)(b)(c), the contractor must document implementation of the program to:

- (1) Assess the skills and general training needs of newly hired craft workers\* and qualify them for their assigned tasks;
- (2) Verify the qualifications of existing craft workers;
- (3) Train inexperienced craft workers (trainees) as necessary
- (4) Evaluate the performance of craft workers at least once per calendar year and provide additional training as necessary
- (5) Ensure compliance with contract specific worker training/qualification requirements

\*A craft worker is one who performs surface preparation and/or applies coating materials

### **B. CONTENTS OF THE PROGRAM - GENERAL TRAINING AND QUALIFICATION REQUIREMENTS**

#### **NEWLY HIRED EXPERIENCED CRAFT WORKERS**

The program must contain provisions to administer written tests and/or a hands-on evaluation to assess the skills of new hires that claim to have previous experience, or verify previous qualifications through a formal training or qualification program

(1) When written tests are used, they shall include information that the contractor determines to be necessary to verify the general knowledge of the trade and the qualifications of the individual tested to perform work assigned. While it is left to the contractor to create or use the test that works best for its business, the contractor must show that the questions and answers are based on training materials, or standards or publications developed by SSPC, ASTM, PDCA, the IUPAT or its affiliates; NCCER or materials developed by another organization, that are acceptable to SSPC.

(2) Hands on Skill Evaluation - At a minimum, an abrasive blasters shall be qualified using the SSPC C-7 hands-on skill assessment protocol for testing blasters or an equivalent hands-on evaluation, acceptable to SSPC. The hands on evaluation can be done in a controlled qualification session in the shop or yard or in the field at an actual production site. The C-7 skills assessment form is available from SSPC.

(3) Spray painters shall be qualified per the contractor’s Quality Control Procedures Manual using industry accepted qualification procedures from one or more of the sources listed in B. (1) above.

(4) Specialty skill qualifications for such processes as UHP Water Jetting, Thermal Spray Metallizing, or Plural component spray shall be developed in house (or outsourced) based on material or equipment supplier best practices when industry standard training or training materials do not exist.

(5) Craft workers previously trained or qualified by your company who have been laid off or who have left to work for another contractor, only to return to work for your company within a two year period need not be re-qualified to update your assessment of their skills.

#### **TRAINEES**

General training for trainees - shall be based on training materials developed by SSPC, PDCA, the IUPAT or its affiliates; NCCER or equivalent materials, acceptable to SSPC.

### **C. QUALIFICATION TO APPLY SPECIFIC MATERIAL AND USE NEW EQUIPMENT**

The program must contain procedures to qualify craft workers to apply materials or use equipment unfamiliar to the craft worker. The program must also document that those workers have been qualified/trained.

### **D. SUPERVISOR**

Each contractor shall designate a “Supervisor” to be responsible for implementation of the company's craft worker training and qualification program and monitoring its effective use in the field. The “Supervisor” shall have sufficient technical knowledge and documented training in the use of specific materials and equipment.

### **ANNUAL PERFORMANCE EVALUATION**

The contractor must have implemented procedures and documentation to show that his/her production supervisor evaluates and documents each craft worker's performance at least annually. Annual performance evaluation is a “major” critical item deficiency (see audit item number 9).

### ***Section XXIII: QP1 Appendix B***

#### ***QCS Formal Training Course (SSPC QCS or equivalent):***

- course material should meet the BOK outlined in ASQ Quality Management System (basics) - 16 hour course minimum (final lecture examination, minimum passing grade 80%)- curriculum must include definitions of quality systems, quality manuals and procedures, documentation and data controls, calibration programs, contract document and specification review, work plans and process control procedures, inspection plans, inspection reports, internal audits, and SSPC QP audit requirements) certificates must be issued after successful completion minimum Instructor qualifications (SSPC QCS or equivalent, 3 years experience in industrial/marine protective coatings QCS and inspection)

#### ***QC Inspector Formal Training Course (e.g. include SSPC PCI, NBPI, BCI; NACE CIP Level I, KTA Level I, or equivalent):***

- course material should meet the BOK outlined in ASTM D 3276
- 24-hour course minimum (final lecture examination, minimum passing grade 70%)
- course must include an 8-hour hands-on inspection instrument workshop (graded instrument use examination, minimum passing grade 70%)
- inspection plan development
- documentation of inspection results
- SSPC industry standards and visual guides
- specification review and product data sheets
- certificates must be issued after successful completion
- minimum Instructor qualifications (e.g. include SSPC PCS, PCI, NBPI, BCI; NACE CIP Level I, KTA Level I, or equivalent; 3 years experience in industrial/marine protective coatings QC inspection)

#### ***For QP course equivalency consideration, please submit the following:***

- curriculum, course schedule, and course locations
- training materials
- quizzes and examinations
- Instructor roster and qualifications