



QP2 Audit Evaluation Checklist

Contractor: _____

Location: _____

Date: _____

Type of Audit: _____

Auditor: _____

AUTHORITY AND RESPONSIBILITY OF COMPETENT PERSONS

Audit Item Number	QP Number	Required Information	Rating	Auditor Notes
1.a.	4.2.2.1	<p>Does the company have adequate Competent Person (CP) capabilities? Does the competent person (CP);</p> <ul style="list-style-type: none"> • Report directly to upper management? • Have written authority to ensure hazardous coatings abatement is carried out according to compliance plans and governmental regulations? • Have the authority to stop nonconforming coatings removal operations (The competent person is an employee or independent contractor and has written authority from executive management to ensure that hazardous coatings removal is carried out IAW safety, health and environmental compliance plans and regulations. 	1 2 3	Payroll records checked. Competent person is employee <input type="checkbox"/> CP has written authority from upper management <input type="checkbox"/> CP Backup plan in-place <input type="checkbox"/>
1.b.	4.2.2.1	<p>Authority & Responsibility of Competent Persons The CP must be put in a position by management to carry out duties and responsibilities. Is the competent person a routine member of the crew that performs hazardous paint removal operations that the CP is required to oversee?</p>	1 2 3	CP Not a production crew member <input type="checkbox"/> Budgeted separately <input type="checkbox"/>
1.c.	4.2.2.2	<p>Is the competent person (CP) responsible for the following? Monitoring effectiveness of the environmental controls? Supervision of both airborne and biological exposure monitoring & employee notification?</p>	1 2 3 1 2 3	Daily documentation of engineering and management control of hazardous coatings disturbance <input type="checkbox"/> Personal Air Monitoring and BLL/ZPP are available on original or copies of lab reports. <input type="checkbox"/> Is there risk of exposure to Cadmium, Arsenic, Hexavalent Chrome and the other RCRA 8 heavy metals? <input type="checkbox"/>

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1.c. (Continued)	4.2.2.2 (Continued)	<p>Hazard communication training and implementation?</p> <p>Ensuring employees entering contaminated zones are properly protected and trained in use and maintenance of personal protective equipment (PPE), types of exposure control methods, and decontamination practices?</p> <p>Verification of the proper functioning of engineering controls?</p> <p>Ensuring the minimization of emissions to air, water, or soil?</p> <p>Is access to the site and designated contamination work zones controlled?</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Are Training sign-offs available? <input type="checkbox"/></p> <p>Do they match payroll or independent contractor training records? <input type="checkbox"/></p> <p>Are Correct respirators in use and is the Respiratory Protection Program on-site? <input type="checkbox"/></p> <p>Hazardous communications training records are available for crew currently working or scheduled to be working on site? <input type="checkbox"/></p> <p>Listing of hazard protection equipment on-site and performance of equipment monitored and documented on daily checklists? <input type="checkbox"/></p> <p>If applicable, are chain-of-custody forms used and available? <input type="checkbox"/></p> <p>Are job-site access restrictions in-place? <input type="checkbox"/></p>

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3.a.	4.3.2.a 4.3.3.a	“Qualification Category” <ul style="list-style-type: none"> Can the contractor demonstrate competence in protecting, storing, and labeling hazardous materials and waste? 	1 2 3	Written Environmental Protection Plan available (corporate or site-specific) <input type="checkbox"/>
	4.3.6.1.b	<ul style="list-style-type: none"> The Company has a written environmental protection plan for the project (for past projects, such documentation can include: photographs of the site equipment and waste storage area (must identify contractor by name and date); sample chain-of-custody forms signed by the CP 	1 2 3	
	4.3.5	<ul style="list-style-type: none"> TCLP sample results; and completed waste disposal records (Uniform Hazardous Waste Disposal Manifests if a hazardous waste. 	1 2 3	
	4.3.7.4g	<ul style="list-style-type: none"> The Contractor documents and demonstrates competence in the safe operation and maintenance of paint removal equipment (e.g., blast cleaning equipment; hand and power tools; water jetting equipment; chemical stripping apparatus). 	1 2 3	
	4.3.7.4.4g	<ul style="list-style-type: none"> There are written safe operating procedures (SOPs), initial worker training records, periodic safety meeting documentation 	1 2 3	SOP's on site-records of worker and supervisor Training on SOP's are available <input type="checkbox"/>
3.b.		<ul style="list-style-type: none"> Weekly maintenance inspections and disciplinary records for noncompliance. 	1 2 3	
3.c.	QP1 - 3.4.1	<ul style="list-style-type: none"> Workers at the active job site follow safe operating procedures. 	1 2 3	

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4.b. (Continued)	4.3.7 (Continued)	<ul style="list-style-type: none"> • Type and condition of containment • Negative air flow readings are documented • Documented methods and procedures used to control hazardous materials and debris • Applicable Technical Standards required by the project being audited. (e.g., SSPC-Guide 6, SSPC-Guide 7, SSPC-Guide 16, SSPC-TU 7). <p><i>¹For work in Marine and General Industries the equivalent standards governing coating removal under 29 CFR 1915 and 29 CFR 1910 apply (i.e. 1910.1025, Lead would be equivalent with 1926.62).</i></p> <p>Other Documentation Required at Jobsite: 1</p> <ul style="list-style-type: none"> • Project specification, change orders, and other documentation as listed in QPI Section 3.1.3 and 3.2.3. • Document authorizing employees to act (e.g, competent person authority, including backup competent person), job descriptions of site personnel • OSHA and other regulatory postings • company mission statement • records of project safety meetings (topic and attendees) • evidence of job-specific worker safety training • safe operating procedures for equipment • hazardous waste manifests where applicable (e.g., solid waste disposal, laundry, waste water, discarded respirator filters, etc.) 		
5.a.	4.4.6	<p>Safety Coordinator: The Contractor shall have a Safety Coordinator that has successfully taken a minimum 30 hours OSHA-approved Construction Safety Training plus SSPC C-3 (or other training that has been approved by at least one of the states maintaining a training program accreditation system applicable to the industrial/marine coatings industry).</p> <ul style="list-style-type: none"> • This person may be on the Contractor's staff, or the 	1 2 3	

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5.a. (Continued)	4.4.6 (Continued)	contractor may utilize the services of an industrial hygiene or safety professional with knowledge of hazardous coating removal operations. <ul style="list-style-type: none"> • It is not necessary, as it is with the Competent Person, for the safety coordinator to be on site at all times. However, the safety coordinator shall be available for consultation as needed during exposure producing operations. 		
5.b.	4.4.1 and 4.4.3	<p>Training and experience of CP: CP training curriculum requirements (32 hour course minimum):</p> <ol style="list-style-type: none"> 1. Relevant hazardous and solid waste handling procedures. 2. Relevant portions of the following regulations and standards. <ul style="list-style-type: none"> • National Ambient Air Quality Standards. • OSHA construction industry standards on lead. • EPA solid and hazardous waste regulations. • EPA site cleanup and spill response regulations. • Relevant State and local environmental regulations. 3. Different removal methods, classes of containment, and environmental controls consistent with one of the qualification categories specified in QP 2 Section 4.3. 4. All aspects of training specified in QP 2 Sections 4.2.2. 5. Relevant safety practices found in QP 2 Section 4.5. 6. C-5 Annual refresher training or SSPC-accepted alternative, accepted in advance of audit by Certification Manager. <p>Additional Competent Person Qualifications:</p> <ul style="list-style-type: none"> • A minimum of 2 years of field experience in industrial/marine coatings. • The competent person (CP) has furnished evidence such as training certificates (32 hours minimum) and training manual that covers the curriculum described above. Professional safety, health and environmental personnel conducted the training. • Resumes, or equivalent documentation must verify that CP course instructors were either Certified Industrial Hygienists, Certified Safety Professionals, or had an undergraduate degree (minimum Bachelors degree) in safety, industrial hygiene, environmental science, or related field with 3 years related experience. 	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Only accept SSPC C-3 or alternative accepted in advance by SSPC Cert Mgr <input type="checkbox"/></p> <p>Only accept SSPC C-5 or alternative accepted in advance by Cert Mgr <input type="checkbox"/></p>

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6.	4.4.4	<p>Production and Job-site Located Support Personnel: There is evidence or documentation that production and support personnel (e.g., those involved in hazardous paint removal operations or related work) have been given annual training on the following topics:</p> <ul style="list-style-type: none"> a. Contents of 29 CFR 1926.21, 1926.59, 1926.62 and any EPA regulations in effect to comply with Title X. b. Awareness of the types of operations with lead or other hazardous materials that could result in exposure that exceeds the action levels. If no action level exists, use half of the Permissible Exposure Limit (PEL) or Threshold Limit Value (TLV) as the threshold. c. Procedures for handling hazardous materials and waste. d. Proper operation and maintenance of environmental control systems (e.g., dust collectors, recycling units, containment structures) as well as coating removal tools and equipment. e. Contents of the contractor's general and site specific written compliance plans. <p>There is evidence or documentation that production and support personnel (e.g., those involved in hazardous paint removal operations or related work) have been annually trained, including the following:</p> <p>The contractor has provided evidence including training certificates and training manuals demonstrating that production and support personnel (e.g., those involved in hazardous paint removal operations or related work) have been trained in hazards of their specific jobs for the specific project. The training manual for the course(s) must address all items described above and training conducted by the Contractor's competent person or a qualified safety and health professional as described in item 5a above. Each employee has participated in the training program at least annually. A sign-off sheet must document initial and annual training.</p>	 1 2 3 1 2 3 1 2 3 1 2 3 1 2 3	Review training documentation and sign off sheets <input type="checkbox"/> Are all exposed workers on the payroll trained <input type="checkbox"/>
7.	4.3.1 4.3.7.1 4.4.5	<p>Worker Safety and Health Program: The contractor has a written worker safety and health protection plan <u>at the job site</u>, which includes, at a minimum, the following:</p> <ul style="list-style-type: none"> A. Defined responsibilities for a safety coordinator who shall have a minimum of 30 hrs. documented training in industrial hygiene and safety or a degree in either of these aspects. 	1 2 3	Safety Coordinator Qualified? <input type="checkbox"/>

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7. (Continued)	<p>4.3.1 (Continued)</p> <p>QP1 Section 3.4</p> <p>4.3.7.2</p> <p>4.2.2.2</p> <p>4.2.2.2</p> <p>4.3.6.1a</p>	<p>This person may be on the contractor's staff or the contractor may utilize the services of an industrial hygiene and safety professional with training requirements equivalent to item 5a above and knowledge of hazardous paint removal operations. The safety coordinator is available for consultation as needed, during hazardous paint removal operations.</p> <p>B. Evidence that the program addressing all applicable requirements of 29 CFR 1926.62 has been reviewed and formally approved by the above referenced industrial hygiene and Safety Professional. Documented approval specifically attesting that the program has been formally reviewed and approved for industrial painting operations. Management review and approval is also documented (i.e., signed by upper level company management).</p> <p>C. Provisions for both air and biological (i.e. blood lead analysis and ZPP testing) exposure monitoring.</p> <p>D. Details of a hazardous materials compliance plan including provisions for protective clothing, housekeeping, hygiene, medical surveillance, training, and record- keeping.</p> <p>Details of a respiratory protection program with specific provisions for:</p> <ol style="list-style-type: none"> 1. Selection of respirators 2. Medical evaluation of wearers 3. Fit testing of respirators 4. Proper use of respirators 5. Cleaning and maintenance of respirators 6. Air supply and quality (for air supplied respirators) 7. Training in respiratory hazards and use 8. Program evaluation 9. Experienced or properly trained program administrator <p>E. Employee training in hazard communication according to OSHA 29 CFR 1926.59.</p> <p>F. The contractor's written worker protection plan includes the applicable requirements 29 CFR 1926.92 (Lead Exposure in Construction; Interim Final Rule), and all items 7A-F stated above.</p> <p>G. OSHA Recordkeeping (30yrs) observed?</p>	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Safety Program reviewed and approved annually by exec mgmt and every 3 years by a safety or IH professional or when a new process is used or a new regulation is issued that significantly affects the contr's hazardous paint removal operations. <input type="checkbox"/></p> <p>Does company documentation and observed field practice match the contr's safety and health program requirements? <input type="checkbox"/></p>

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8.	4.3.6.1 (Continued) and 4.3.7.2	<p><i>Environmental Compliance Plan:</i></p> <p>8a. <u>The contractor has a written environmental protection plan at the job-site which may include the following depending upon contract specification requirements:</u></p> <ol style="list-style-type: none"> 1. A daily criterion for air monitoring using TSP-Lead or approved equivalent. Procedures for instrument monitoring of particulate matter and lead and/or for visual assessment of emissions by a qualified person. Quality assurance criteria for ambient air monitoring. 2. Lead analysis of soils including cleanup criteria, soil analysis and soil sampling. 3. Information on water quality regulations and guidance on compliance with provisions from the National Pollutant Discharge Elimination System, and sampling of water/sediments. 4. Discharges as a result of site clearance, (e.g. containment material and equipment decontamination operations). <p>*NOTE: Some contractors prepare and use site-specific environmental protection plans rather than invoke a general plan. Either is acceptable as long as regulatory and contract requirements are addressed for each hazardous paint removal project undertaken.</p> <p>8b. The contractor's hazardous waste materials management disposal plans address the following:</p> <ol style="list-style-type: none"> 1. Methods of testing debris (Toxicity Characteristic Leaching Procedure (TCLP), EP Toxicity Test Procedure where allowed). 2. A sampling plan for collecting debris for testing. 3. Sample identification and chain of custody forms. 4. Site Storage and Handling Practices. Treatment and Disposal Practices as appropriate, including site clearance of contaminated equipment, containment, materials and proper disposal of filters, tarps, etc. 	<p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p> <p>1 2 3</p>	<p>Is EC plan job site–site specific? <input type="checkbox"/></p>

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9.	4.3.7.2 (Continued)	<p>The contractor demonstrates and has documents that demonstrate that the contractor worker safety and environmental plans are enforced. Documentation includes:</p> <ul style="list-style-type: none"> • Records of site inspections with follow-up on deficiencies; safety meetings addressing known hazards • Worker training documentation; and internal disciplinary actions in the event of a noncompliance • The contractor can document that procedures and policies in place to ensure worker protection and environmental compliance are enforced. • Work site inspection reports, safety meeting records, and worker training documents are used to reinforce proper work practices. • Written disciplinary procedures include a prescribed procedure of verbal warning, written warning, suspension, termination (or equivalent) for first, second, third and fourth offenses, respectively. • Disciplinary actions are issued in the event of noncompliance. Records of enforcement of disciplinary procedures must be maintained in the project and/or personnel files. • All enforcement criteria must address the requirements of the written worker protection plan and environmental protection plan required in Items 7 and 8 respectively. The role of the competent person must fulfill the authority and responsibility requirements of Evaluation Item 1. 	1 2 3	<p>Toolbox meetings conducted? Topics relevant to work activities? <input type="checkbox"/></p> <p>Safety and Health violations written up? Employee counseled? Supervisor notified? <input type="checkbox"/></p>

NOTE TO AUDITOR: QP-2 application item #4 has been skipped. Item #4 refers to the "Work History" part of the application submittal and is not rated by the auditor, although it must be used as a reference during the audit.

RATINGS DEFINITION OF SCORING TERMS

1. **Number 1 – MAJOR CAR** = Required training, written program, practice or procedure non-existent OR Required training or written program inadequate; required practice and procedure in place without a minimal history of conformance (i.e. six consecutive production months) or in place sporadically (e.g. less than 2/3 implemented).
2. **Number 2 – MINOR CAR** = training or written program adequate or requiring minor revisions; i.e. practice ore procedure is in place with instance (nor more than 1/3 of the time) of nonconformance (e.g. lack of practice or documentation due to personnel turnover, nonperformance by field personnel, personal hardship, natural disaster, etc).
3. **Number 3 – No CAR required** = Company consistently adheres to specific training and written program requirement; required practice and procedure consistently meets the letter of the standard.

Pass Criteria for each item – minimal rating of 2 and redemption of MINOR CAR within 45 days of on-site audit.

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 / scaffolding; and equipment maintenance.

The contractor will control its sub-contracting process to ensure that its sub-contractors conform to PCCP requirements. The contractor shall evaluate and select sub-contractors based on their ability to provide products or services in accordance with the contract and PCCP requirements.

Purchasing documents sent to the sub-contractor 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.

Appendix A
Category A Containment Notes:

The company demonstrates competence in coating removal using containment and ventilation meeting requirements of Classes 1A, 2A, 1P, or 1W of SSPC Guide 6 (CON) during the active job site walk through. The contractor also documents successful completion of a project where the job specification required Class 1A, 2A, 1P or 1W containment with ventilation. Copies of the job specification requiring Class 1A, 2A, 1P, or 1W containment or equivalent, and the drawings, calculations, and photographs of the containment successfully used in response to the job specification must be provided. For jobs completed in the past, photographs must show the site, containment and ventilation equipment and identify the contractor by name and date. Evidence of payment for substantial completion of work or owner verification is available.

To achieve initial Category "A" QP 2 certification, contractors are required to demonstrate the ability to erect and operate within the containment on the structure where cleaning and coating are taking place. To maintain QP 2 Category "A" certification after initially earning it, a contractor must demonstrate Category "A" capability at an active job site where an SSPC auditor can witness the containment in operation at least once in the 48 calendar months following each on-site verification. **It is the responsibility of the contractor to notify SSPC when and where it is performing QP 2 Category "A" type work.**

Removing components from a structure and cleaning and coating them in a yard under a temporary or permanent containment structure, or similar operations, is considered "shop" painting and does not meet QP 2 Category "A" requirements. Also for the purposes of QP 2 Category "A" qualification, the structure being cleaned and painted (e.g., an interior section of a building or the interior of a tank or other vessel); or the cleaning equipment itself (e.g. vacuum-shrouded power tools; or vacuum shrouded blast cleaning equipment) is not considered a "containment structure."

Contractors performing industrial deleading or other types of hazardous paint removal operations using such cleaning methods as hand and power tool cleaning; wet abrasive blast cleaning or water jetting, in accordance with applicable regulations and contract requirements, WITHOUT THE USE OF A CONTAINMENT STRUCTURE, may be eligible for Category "B," QP 2 certification. (Refer to SSPC-QP 2, September 1, 2009 or latest revision).

A QP 2 Category A job has a functioning mobile dust collector connected to the containment enclosure with ductwork that provides adequate air flow from the containment enclosure. The dust collector found on an industrial painting project will typically be a mobile unit with appropriate duct work and have an exhaust capacity of 10,000 cfm or greater. Dust collectors with higher exhaust capacity are normally seen on industrial hazardous paint removal projects on storage tanks, bridges, ships and other industrial structures.

When evaluating a QP 2 Category A job, the SSPC auditor must be able to observe coating removal using containment and ventilation that meets the requirements of SSPC Guide 6 Classes 1A or 2A or 1W or 1P. The majority of projects meeting Category A guidelines fall into Class 1A or 2A (Dry Abrasive Blast Cleaning Operations). A Category "A" containment structure shall be mechanically ventilated (i.e. have an operating dust collector attached to it). Air movement through the containment enclosure shall be measured by the contractor to ensure adequate air flow, and the measurements must be documented by Contractor.

Air flow in enclosures and ductwork can be measured using such instruments as vane anemometers or other tools that measure velocity of air. In addition to measurement of air flow, the contractor must demonstrate that the dust collector is "pulling" negative air through the enclosure. Negative pressure is created when the air pressure inside containment is less than the air pressure outside of the containment. The contractor must verify the existence of negative pressure by instrument measurements or by visual assessment.

And finally, in order to be considered a Category A project, the contractor must be performing the actual work as a Category A project. That is, the use of a Category A type containment must be required by specification or approved in writing by the authorized facility owner representative. If only a portion of the surface preparation is Category A work, the contained work area to be cleaned and painted shall be a minimum of 1,000 sq. ft.

IMPORTANT NOTE: Demonstrations set up on a project just for the time the SSPC auditor is present at the job site for a QP 2 audit will not be considered for Category A under any circumstances.

Any contractor who has a question whether a project they're doing is a Category A project, can contact SSPC for a preliminary determination. Note, however, that regardless of any preliminary determination, what the auditor actually sees at the job site and reports to SSPC will determine whether the project meets Category A requirements.

For the purposes of QP 2 job site auditing, a valid hazardous paint removal job is defined as a project in which the contractor is removing a coating and air monitoring by a qualified independent laboratory shows that airborne exposure exceeds prescribed limits, that is, the Permissible Exposure Limit (PEL). For example, 50 micrograms per cubic meter of air, as a Time Weighted Average (TWA) over an eight hour period is the current OSHA PEL for lead. The PEL (micrograms per cubic meter of air) for other metals that might be found in paints being removed include: Arsenic = 10; Cadmium = 5; Chromium = 500.

Note: If the contractor chooses to do its own exposure monitoring, it must provide independent confirmation in writing from a qualified CIH or CSP familiar and experienced with industrial painting operations, that the monitoring protocol being used by the contractor on the job is being done in accordance with regulations and accepted practice with properly functioning and calibrated equipment. If project airborne exposures do not exceed the PEL, the contractor may still be eligible for QP 2 certification provided the contractor can:

1. Demonstrate (i.e. provide documentation by independent, accredited/approved laboratories) during the QP 2 audit that it has historically implemented its OSHA & Environmental compliance programs to the extent required by regulations but that none of its hazardous paint removal projects has required full implementation of its compliance plans; and
2. Demonstrate during the QP 2 audit that it has the capability to fully implement its compliance programs at a moment's notice, if project and work process conditions dictate; and
3. Agree in writing to notify SSPC as soon as it takes on a project where it must fully implement its compliance programs (i.e. on projects where the contractor cannot reduce the exposure below the OSHA PEL and/or where waste generated at the job site is tested and deemed hazardous).

The SSPC Certification Manager reserves the right to not accept a project for a corrective action verification or a post-DAC audit where project airborne exposures do not exceed the PEL or TLV where there is no OSHA PEL. Regardless of which scenario the contractor can present, the SSPC auditor must observe the contractor removing hazardous paint (based on independent laboratory tests of paint/materials being removed) at an active job site during the initial QP 2 audit.

The contractor demonstrates competence in coating removal using containment meeting requirements of Classes 3A, 4A, 2W, 3W, 4W, 1C, 2C, 3C, 2P or 3P of SSPC Guide 6 (CON) during the active job site walk through. For jobs completed in the past, the contractor also documents successful completion of a project where the job specification required Class 3A, 4A, 2W, 3W, 1C, 2C, 3C, 2P or 3P containment. Copies of the job specification requiring Class 3A, 4A, 2W, 3W, 4W, 1C, 2C, 3C, 2P or 3P containment or equivalent, and the drawings, calculations, and photographs of the containment successfully used in response to the job specification must be provided. Photographs must show the site, containment identify the contractor by name and date. Evidence of payment for substantial completion of work or owner verification is available.

To achieve initial Category "A" QP 2 certification or renew Category "A" certification, contractors are required to demonstrate the ability to erect and operate within a containment on the structure where cleaning and coating. Removing components from a structure and cleaning and coating them in a yard under a temporary or permanent containment structure, or similar operations, is considered shop painting and meets QP 3 (Shop Painting), not QP 2 requirements. For the purposes of QP 2 qualification, the structure being cleaned and painted (e.g., an interior section of a building or the interior of a tank); or the cleaning equipment itself (e.g. vacuum-shrouded power tools; or vacuum-shrouded blast cleaning equipment) are not considered a "containment structure."

Contractors performing industrial deleading or other types of hazardous paint removal operations using such cleaning methods as hand and power tool cleaning; wet abrasive blast cleaning or water jetting, in accordance with applicable regulations and contract requirements, WITHOUT THE USE OF A CONTAINMENT STRUCTURE, may be eligible for Category "B," QP 2 certification. (Refer to SSPC-QP 2, September 1, 2009 or latest revision.