



**SSPC QP2  
APPLICATION,  
INSTRUCTIONS,  
AND  
PROGRAM RULES**

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## I. Introduction

SSPC developed the QP 2 Certification Category under its Painting Contractor Certification Program (PCCP) to assess the primary capabilities of contractors to protect worker health and safety and the environment, while successfully completing industrial/marine hazardous paint removal projects. It is written according to the requirements of SSPC-QP 2, "Standard Procedure for Evaluating the Qualifications of Painting Contractors to Remove Hazardous Paint."

QP 2 is intended to assist owners, specifiers, and general contractors in their evaluation of potential bidders. Prequalification using QP 2 certification does not eliminate the need to evaluate the contractor's financial or technical capabilities to meet project-specific requirements. SSPC recommends evaluating the contractor on those issues and other areas not covered under this program. To better ensure the success of a project, owners and specifiers should write quality specifications; maintain ongoing communication with Contractors before and during project work, and enforce specification requirements.

QP 2 certification does not involve personnel or environmental monitoring or personnel training. It does not cover hazardous paint removal conducted exclusively at the contractor's fixed facility or yard (i.e. shop painting). Finally, the program is not intended to guarantee the quality or safety performance of a specific contractor on any of its projects as enforcement of contract requirements is the obligation of the owner or prime contractor.

This package contains information and materials you need to apply for SSPC QP-2 Certification. You will find copies of this application and all other related documents detailing program requirements, related procedures, clarifications, etc., on SSPC Online at <http://www.sspc.org>. Click on Certification and click the link, List, Forms and Applications. Contractors who desire program information but who do not have access to the Internet, can contact the PCCP office at phone: 412-281-2331, ext. 2235 or 2209, fax: 412-281-9993.

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

**Important Note:** Contractors applying for SSPC QP2 certification must demonstrate a history of compliance with QP2 quality and safety requirements. QP2 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.

## II. General Program Procedures

The SSPC QP 2 certification process uses this sequence of procedures that you must follow:

- Complete the application found in Section III.
- Gather and prepare the required information outlined in Section III following the application.
- Submit the five items of information on the evaluation checklist (see Section IV) to SSPC along with the appropriate non-refundable certification fee and any required audit deposit described in Section V.
- SSPC will review your submittals. If everything is in order, an SSPC auditor will perform the on-site audit. If not, SSPC will indicate to you what must be done to complete the application. When you submit the requested information to complete your submittal, SSPC will contact you to schedule the audit.
- An SSPC program auditor will conduct the on-site evaluation at a steel structure job site where worker protection, lead health and safety, and environmental compliance programs have been implemented. SSPC selects the job site for evaluation, and it is possible that prior notification will not be given. The initial audit will most likely include a visit to your place of business to obtain information not required at the job site, but essential to complete the audit. Note: The auditor will review randomly selected project files that are listed for Item #7. During the audit you must be able to present the files, and ensure availability of management and production personnel familiar with those projects.
- The audit is closed with an exit interview to advise you of any findings cited during the audit.
- If you have a qualifying score and submit any required corrective action reports in a timely manner, your company will be eligible for certification, subject to SSPC acceptance of corrective action plans, your adherence to the programs administrative rules, your avoidance of disciplinary action as described in the Disciplinary Action Criteria (DAC), and your ability to maintain program standards during the following 12 months. Certification lapses after one year.
- If you do not qualify, you have up to 90 days after SSPC notifies you to submit an acceptable written corrective action plan to correct deficiencies and request re-evaluation at a later date. If you do not submit acceptable corrective actions within 90 days, you must re-apply for initial certification.
- The program provides for an appeals procedure should you disagree with audit findings. Refer to Section VII Part C, "Appeal Procedure," for more details.

**III. QP 2 Application - SSPC's Painting Contractor Certification Program, Removal of Hazardous Paint**

Instructions: SSPC uses the application form to obtain information that will aid in evaluating and rating your firm. To avoid delays in the evaluation process, you must answer all questions accurately and truthfully. Information must be either typed or printed legibly. Please send SSPC two typed or printed copies of your completed application, along with two copies of submittals and the correct non-refundable fee/deposit. Companies applying for QP 1 and QP 2 at the same time can omit filling in the same information asked for on the QP 1 application by simply stating "See QP 1 application" on the appropriate line. Electronic submittals are also accepted. Contact the certification office for details.

1. Company Name \_\_\_\_\_

Principle Officer and Title: \_\_\_\_\_

Business Address: \_\_\_\_\_

Email Address: \_\_\_\_\_

Web Address: \_\_\_\_\_

Telephone w/Area Code: \_\_\_\_\_

Fax w/Area Code: \_\_\_\_\_ Federal I.D.: \_\_\_\_\_

2. Type of Business:  Sole  Proprietorship  Partnership  Corporation

3. Years your company has operated under the name listed in #1 \_\_\_\_\_. If your company has used its current name less than three years, list its previous names below.

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

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

4. Is the location listed in #1 the main place of business?  Yes  No

If not, list branch offices and locations: \_\_\_\_\_

\_\_\_\_\_

5. 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 Section X Part A, "Major Changes in a Company's Organization."

6. Field Audit Information of Active Job Sites: The certification program requires that auditors conduct a field visit to an active industrial painting job site. List locations of industrial structure hazardous paint removal jobs in progress where job site interviews and observations can be conducted. Following each item include any restrictions such as special safety requirements, facial hair, security clearances, etc.)

a. Job Site: \_\_\_\_\_

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

\_\_\_\_\_

Name, title, and phone number of contact person on this job site: \_\_\_\_\_

\_\_\_\_\_

Dates on job site: \_\_\_\_\_ Shift: \_\_\_\_\_

b. Job Site: \_\_\_\_\_

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

Name, title, and phone number of contact person on this job site: \_\_\_\_\_

Dates on job site: \_\_\_\_\_ Shift: \_\_\_\_\_

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c. Job Site: \_\_\_\_\_

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

Name, title, and phone number of contact person on this job site: \_\_\_\_\_

Dates on job site: \_\_\_\_\_ Shift: \_\_\_\_\_

7. Attach copies of any serious or willful federal, state/provincial or local regulatory agency worker safety and health, or environmental non-compliance, or other regulatory agency violation 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.

8. Submit a required copy of OSHA Form 170 or equivalent, regarding fatalities that have occurred on your job sites in the last 36 months.

9. Has your company or any of its personnel been 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. (Refer to SSPC Online at <http://www.sspc.org/site/cert.html> for the Disciplinary Action Criteria (DAC).)

10. This is a 2-part question:

- 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 SSPC under the DAC? (Refer to SSPC Online at <http://www.sspc.org/site/cert.html> for information about DAC.)

Yes  No If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

If your company has not had such an 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 lead to 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. Please attach a copy of your most recent (12 months) OSHA accident and illness summary form, OSHA Form 300, if applicable.

13. Total production hours logged in previous calendar year: \_\_\_\_\_

Source of Information: \_\_\_\_\_

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, please indicate the category of membership:  Patron  Sustaining  
Membership Number: \_\_\_\_\_ Date membership expires: \_\_\_\_\_

16. Indicate which categories of certification you are applying for: (Refer to the Items 3a and 3b of the Section IV, "Evaluation Checklist" to determine which category your firm is eligible for.  
Choose one.  Category A  Category B

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

Initial: \_\_\_\_\_ The QP 2 Certification Program Application Form , Instructions and program rules.

Initial: \_\_\_\_\_ The QP 2 procedure set forth therein.

Initial: \_\_\_\_\_ The Disciplinary Action Criteria (DAC).

As a principal officer of the application contractor, I agree 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)

Signature: \_\_\_\_\_

Print Name and Title: \_\_\_\_\_

Date: \_\_\_\_\_ Certification fee/deposit submitted with this application: \_\_\_\_\_

For a detailed description of fees refer to Section V, "Fee Payment Schedule."

Caution: Failure to report accurate, complete information will delay your certification evaluation. Omission or falsification of information will result in withholding, denial or revocation 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 listed 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 function areas outlined below. The Evaluation Checklist in the Section IV contains detailed information for each area.

- Management Procedures: Measures utilized by your company to organize, coordinate, and otherwise manage hazardous paint removal projects.
- Technical Capabilities: Resources maintained by your company to properly interpret and execute job specifications and requirements.
- Personnel Qualifications and Training: An evaluation of the qualifications and training of persons you employ to supervise, monitor and perform hazardous paint removal work.
- Safety and Environmental Compliance Programs: Programs to ensure that you conduct hazardous paint removal operations in accordance with OSHA, EPA and other governmental regulations.

Each of these four major function areas above contains several subcategories focusing on your company's policies, personnel, procedures and resources. You must provide a total of nine (9) items of information for the auditor to review on site. The auditor will verify and evaluate all nine items of information during the on-site visit. The necessary records or files that you must present at that time, include but are not limited to: job files for projects reported in #7 on your application, job files for which job notification forms are on file, work logs, contracts, equipment maintenance records, inspection and monitoring reports, specifications, laboratory test results, containment and ventilation drawings, etc. Some information will be gathered through interviews with your personnel.

You must submit five (5) items in writing with the application. They must be typed or printed legibly on separate sheets of paper and clearly identified. Identify in the same way documents such as written compliance programs, and file documents such as copies of specification pages and letters that already exist. Section IX lists and describes the 5 items.

**Note to Applicants Requesting an Evaluation:**

Company policy - Your firm must have a written mission or company policy statement, which expresses top management's commitment to protect the safety and health of your workers, the public, and the environment during hazardous paint removal operations. SSPC requires that you communicate this mission to your employees verbally, in case some cannot read or understand English.

Technical Library - SSPC expects your company to have or demonstrate accessibility to an up-to-date library of industrial and government resources on to hazardous coating removal. These include:

- All relevant federal, state and local occupational safety and health standards, regulations, compliance directives and guidelines,
- Ventilation standards and procedures, if applicable.
- Relevant federal, state and local environmental regulations on solid waste, hazardous waste, air quality, water quality, and soil quality.
- Containment guidelines and technical data sheets (e.g., equipment operating manuals).
- Blast cleaning and other coating removal methods (e.g., vacuum shrouded power tools, chemical stripping or water jetting).
- Waste collection, handling, and disposal guidelines.
- Industrial hygiene and safety practices.

**IV. Evaluation Checklist**

This is a list and description of nine items of required information for QP 2 certification. Each item that must be submitted with your application is noted.

**A. Management of Hazardous Paint Removal Projects**

1. Authority and Responsibilities of the Competent Person (CP) - You must demonstrate the following:
  - a. The competent person is an employee, or independent contractor, who reports directly to upper management (e.g., corporate safety officer, chief engineer, quality assurance or quality control manager, project manager, superintendent, CEO, or other an active member of executive management).
  - b. The competent person has written authority to ensure operations are carried out in accordance with compliance plans and applicable regulations.
  - c. The competent person is not routinely a member of the work crew and is budgeted for separately. NOTE: The auditor may ask to see payroll records or invoices or daily CP documentation to confirm CP was on site during exposure producing operations.
  - d. There is a back-up competent person in the event the designated CP is absent from the job site during paint removal operations.
  - e. The competent person (at a minimum) is responsible for:
    - 1) Monitoring the effectiveness and ensuring the continued integrity of environmental controls.
    - 2) Supervising worker exposure monitoring or overseeing monitoring activities performed by others.
    - 3) Ensuring that a hazard communication (HAZCOM) program and other applicable training is conducted for the contractors' personnel on site.
    - 4) Ensuring that employees working in the exposure area are wearing required personal protective equipment (PPE) and are trained in the use and maintenance of such equipment and in the use of exposure control methods, personal hygiene facilities, respiratory protection, and decontamination practices.
    - 5) Ensuring that any required containment or engineering controls are in operating condition and functioning properly.
    - 6) Ensuring that fugitive emissions to air, water or soil are minimized and that the handling of all waste streams is in compliance with applicable regulations and contract specifications.
    - 7) Controlling access to the worksite and ensuring that contamination control boundaries are marked off.

- 8) Maintaining project documentation such as exposure assessment results, ventilation performance checks, respirator fit tests, personal monitoring results, results of site safety inspections, medical surveillance results, etc., in accordance with your company's approved compliance programs.

Note: Hazardous communications training records must be available for the crew currently working or scheduled to be working on site.

2. Six-Month Production Compliance History for Each of the Following Items:

- a. Upper management backs the competent person's authority on any recently completed (past 24 months) and in-progress hazardous paint removal projects.
- b. The competent person corrects non-conforming operations appropriately on any recently completed and in-progress hazardous paint removal projects.
- c. The competent person carried out the minimum responsibilities described above in item 1e on all recently completed and in-progress hazardous paint removal projects.

## B. Technical Capabilities

### Safety and Environmental Compliance Programs

1. Worker Safety and Health Program (Submit with your application.)

Provide a copy of your company's written Safety and Health Plan for Hazardous Paint Removal work. At a minimum, the plan should meet the applicable requirements found in 29 CFR 1926.62, as well as relevant OSHA and NIOSH Guidelines and Compliance Directives. A certified industrial hygienist or certified safety professional must review and formally approve your program for industrial painting operations. The upper level management of your company must sign it. It should define the responsibilities of a safety coordinator, who must have a minimum of 40 hours of training in industrial hygiene, or a safety professional with knowledge of hazardous coating removal operations. Since the competent person must be on site at all times to implement all compliance activities, it is not necessary for the safety coordinator to be on site at all times. The safety coordinator, however, must be available for consultation as needed. Note: You must have access to your written Safety and Health Plan for Hazardous Paint Removal work on all applicable job sites.

2. Environmental Compliance Plan (Submit with your application.)

Please submit a copy of your company's written procedures to protect air, soil and water; along with the ways that you evaluate the effectiveness of protective measures on hazardous paint removal projects. Include your company's procedures for managing and disposing hazardous waste and materials, and conducting site clearance.

3. Enforcement (Submit with your application.)

Describe how your company enforces its worker safety and health, environmental compliance programs.

1a. Requirements for Category "A" Designation

Category "A" consists primarily of dry abrasive blast cleaning, power tool cleaning, wet abrasive blast cleaning, and water jetting within containment. For the purposes of QP 2 qualification, neither the structure being cleaned and painted (e.g., the interior of building or the interior of a tank), nor the cleaning equipment itself (e.g., vacuum-shrouded power tools nor vacuum-shrouded blast cleaning equipment) are considered a containment structure. A Category "A" containment entails the use of an engineered ventilation system with negative pressure in accordance with the classes described in SSPC-Guide 6. To achieve Category "A" QP 2 certification, contractors must demonstrate the ability to erect and operate within the containment on the structure where cleaning is taking place. Removing components from a structure and cleaning and coating in a yard under a temporary or permanent containment structure (or similar operations) is considered shop painting. SSPC-QP 3 addresses shop painting certification.

The contractor seeking Category "A" certification must demonstrate and document competence in the following:

- a. Protecting, storing and labeling hazardous material and waste.
- b. Operation, maintenance, and safety when using water jetting, wet abrasive blast, dry abrasive blast, power tool cleaning or other coating removal equipment.
  - Coating removal using containment and ventilation that meets the requirements of Classes 1A or 2A (for abrasive blasting), 1W (for water jetting), or 1P (for power tool cleaning). These classes are specified in SSPC Guide 6, "Guide for Containing Debris Generated during Paint Removal Operations." Operation, maintenance and safety when using recovery equipment
  - Assessing the quantity of emissions and worker exposure
  - Maintaining employee exposures below the appropriate OSHA Permissible Exposure Limits (PELs). The first step is to use engineering and work practice controls to the extent feasible. The second step is to use respiratory protection that complies with current OSHA regulations (29 CFR 1926.134, 29 CFR 1926.62, Lead Exposure In Construction; Interim Final Rule). CPL 2-2.58 provides instruction on inspection and

compliance procedures. You can obtain a copy from the OSHA website, <http://www.osha.gov>. Search on the topic, respiratory protection.

Contractors performing industrial deleading or other types of hazardous paint removal operations using cleaning methods such as hand and power tool cleaning, wet abrasive blasting, or water jetting without the use of a containment structure may be eligible for certification in Category "B."

#### 1b. Requirements for Category "B" Designation

This category consists primarily of abrasive blast cleaning, chemical stripping, power tool cleaning, wet abrasive blast cleaning, water cleaning or water jetting within containment.

The contracting firm seeking Category "B" certification must demonstrate and document competence in the following:

- a. Protecting, storing and labeling hazardous material and waste.
- b. Operation, maintenance, and safety when using water jetting, wet abrasive blast, dry abrasive blast, power tool cleaning or other coating removal equipment.
- c. Coating removal using containment and ventilation that meets the requirements of Classes 3A or 4A, 2W or 3W, or 4W, 1C, 2C, or 3C or 2P or 3P of SSPC Guide 6.
- d. Operation, maintenance and safety when using recovery equipment.
- e. Assessing the quantity of emissions and worker exposure.
- f. Maintaining employee exposures below the appropriate OSHA Permissible Exposure Limits (PELs). The first step is to use engineering and work practice controls to the extent that they are feasible; the second step is to use respiratory protection that complies with current OSHA regulations (29 CFR 1926.134, 29 CFR 1926.62, Lead Exposure In Construction; Interim Final Rule). CPL 2-2.58 provides instruction on inspection and compliance procedures. You can obtain a copy from the OSHA website, <http://www.osha.gov>. Search on the topic, respiratory protection.

Important Note: The SSPC Auditor has the right to look at payroll records for workers at the job involved in exposure producing operations.

#### 2. Work History (Submit with your application.)

Please provide a complete list of all industrial/marine structure hazardous paint removal jobs completed or in progress within the past 24 months. The applicant must submit adequate evidence that SSPC can utilize to confirm the minimum 6-months experience required to be eligible for an initial QP2 job-site audit. Complex structure hazardous paint removal projects are defined as:

- All prime contracts for public work that involves coating and related work with a dollar value of \$50,000 (US) or more).
- All public contracts for coatings related work in which you are the painting subcontractor regardless of the contract amount.
- All coating and related work where QP 1 and/or QP 2 certification is specified as a requirement, or where having QP 1 and/or QP 2 certification is part of the contractor qualification/evaluation process.

### C. Personnel Qualifications and Training

#### 1. Competent Person Training and Experience (Submit with application.)

Submit documentation showing that the competent person has successfully completed SSPC C-3 training or equivalent, and has the experience described below. Unless otherwise required by applicable federal standards, an equivalent competent person training program must be approved by at least one of the states or localities which maintains a training program accreditation system applicable to the industrial coating industry.

The 32 hours of competent person training (if submitted for approval as an equivalent to C-3 training) must cover the following topics:

- a. Relevant hazardous and solid waste handling procedures.
- b. Relevant portions of the following regulations and standards:
  - 1) the National Ambient Air Quality Standards (NAAQS),
  - 2) OSHA Construction Industry Standards including the requirements: 29 CFR 1926.21, 29 CFR 1926.59, 1926.62, and any EPA regulations in effect to comply with Title X;
  - 3) EPA solid and hazardous waste regulations;
  - 4) EPA site clean up and spill response regulations; and
  - 5) relevant state and local regulations.
- c. Different removal methods, classes of containment, and environmental controls consistent with
- d. the qualification category sought (Category "A" or Category "B").
- e. Awareness of the types of operations with lead or other hazardous materials that could result in exposure exceeding the action levels. If no action level exists, use half of the Permissible Exposure Limit (PEL) or the Threshold Limit Value (TLV) as the threshold.

- f. Proper operation and maintenance of environmental control systems (e.g., dust collectors, recycling units, containment structures) as well as coating removal tools and equipment
- g. Details of your hazardous materials compliance plan:
  - Protective clothing provisions: a) employer will provide protective clothing, b) employer will provide a laundry and c) employees will change work clothes before leaving the work area.
  - Housekeeping provisions: a) delineation of clean and contaminated areas, b) delineation and usage of equipment storage areas, and c) periodic dust and waste clean up.
  - Hygiene provisions: a) hand washing facilities, b) showers with separate areas for clean and contaminated clothing storage and changing, and c) separate work break and eating areas.
  - Medical surveillance provisions: a) physical examination, b) periodic blood testing, and c) medical removal protection in accordance with OSHA.
  - Training provisions: a) use of equipment; b) use and maintenance of respirators; and c) safety such as the use of scaffolding, eye and ear protection, sign, and other issues characteristic of specific job requirements.
  - Recordkeeping provisions: a) OSHA 300 log, b) medical surveillance, and c) training.

Competent person experience must include:

- A minimum of two years industrial painting field experience.
- Experience in relevant safety practices.
- Experience in hazardous waste handling procedures relative to projects described in your work history.

## 2. Annual Competent Person Refresher Training

Competent persons shall successfully complete annual one-day refresher training in the calendar year following their initial training or their last one-day C-5 refresher training. The only training that will be accepted by SSPC is SSPC C-5 training or an alternative training program that covers the same material as SSPC C-5 and is instructed by a qualified person (i.e., a person who meets SSPC's qualifications to teach SSPC C-3 or C-5 programs). Equivalent training programs must be submitted in advance to the SSPC Certification Manager to be considered for acceptance as an alternative to C-5.

## 3. Worker Training

Documentation that production and support personnel, who have eight hours of training annually, are knowledgeable in:

- a. Contents of OSHA regulations: 29 CFR 1926.21, 29 CFR 1926.59 and 29 CFR 1926.62; any EPA regulations in effect which comply with Title X.
- b. Awareness of the types of operations with lead or other hazardous materials that could result in exposure exceeding 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.

Note: **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).

- This person may be on the Contractor's staff, or the contractor may utilize the services of an industrial hygiene or safety professional with knowledge of hazardous coating removal operations. It is not necessary, as it is with the Competent Person, for the safety coordinator to be on site at all exposure producing operations.

**Technical Documentation Required at Jobsite:** Unless otherwise specified, the contractor shall have the following information available at the jobsite during hazardous coating removal activities:

- Facility name, name of principal contact, phone and fax numbers, and email address
- Brief description of the complex structure, summary of work performed, and dates on site
- Coating removal method(s) used and type of hazardous metals removed
- Types of containment and ventilation used, if applicable
- A project-specific compliance plan (reviewed and accepted by the structure owner or the owner's authorized representative).
- Name of competent person(s) on site and their experience and training qualifications
- Verification of successful completion of job or most recent phase, if job is still in progress (e.g., letter from the owner indicating acceptance of work or final payment statements)

- Verification from the owner representative that the job was completed in compliance with applicable federal, state and local regulations enforceable during the projects.
- Note: If requested during a SSPC audit, you must present job records for the reported projects and for which a job notification form is filed. Also, standards governing coating removal under 29 CFR 1915 and 29 CFR 1910 would apply for work in the marine and general industry areas not covered by 29 CFR 1926.

**Note: Platform design and load analysis performed by a licensed professional engineer is no longer required for QP2 compliance.**

**Documentation of Enforcement of Compliance Plans:** The Contractor shall document that procedures and policies are in effect to ensure that the contractor's project-specific worker safety, health, environmental compliance and waste management plans are enforced. Documentation shall include:

- ventilation checks
- respirator fit tests
- worker exposure monitoring results (including field and laboratory documentatoin)
- blood lead level/zinc protoporphyrin (ZPP) test results
- daily safety inspections
- corrective actions implemented and documented\

Daily verification of Engineering Controls should be documented

- Type and condition of containment
- Negative air flow readings are documented
- Documented methods and procedures used to control hazardous materials and debris

- **Applicable Technical Standands** required by the project being audited. (e.g., SSPC-Guide 6, SSPC-Guide 7, SSPC-Guide 16, SSPC-TU 7).

**<sup>1</sup>For 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)**

**Other Documentation Required at Jobsite:**

- 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

**Technical Documentation Required at Contractor's Corporate Office:** The **Corporate Compliance Plan** is required to be available at the Corporate Office and must include:

- A Worker Protection Plan meeting the minimum requirements of OSHA standards for hazardous coatings removal.
- An Environmental Compliance Program that references the monitoring methods described in SSPC-TU 7.
- A Waste Management Program referencing and utilizing appropriate sections of SSPC-Guide 7.
- Reference Material that must be available at the Corporate Office includes:
  - a. Relevant federal, state, provincial, and local occupational safety and health standards, regulations, compliance directives, and guidelines.
  - b. Ventilation standards and procedures, if applicable.
  - c. Relevant federal, state, provincial, and local environmental regulations on solid and hazardous waste and on air, water, and soil quality.
  - d. Equipment operating manuals and dust collector fan curves.
  - e. Blast cleaning and other coating removal methods (e.g., water jetting, vacuum shrouded power tool or chemical stripping).
  - f. Waste collection, handling, and disposal guidelines.
  - g. Industrial hygiene and safety practices.
  - h. SSPC-Guide 6, SSPC-Guide 7, SSPC-Guide 16, SSPC-Guide 18, SSPC-QP 1, SSPC-TU 7 hazardous waste manifests where applicable (e.g., solid waste disposal, laundry, waste water, discarded respirator filters, etc.

You must submit your non-refundable fees (the annual administrative fee plus a deposit for audit expenses) with your QP 2 application in advance. SSPC will withhold your certification until receiving total payment. The fees cover the cost of staff time to review and process your application package, the cost of the on-site evaluation and audit, and the overhead expenses required to operate the Contractor Certification Program. Use the following tables to determine your fees.

**Note: Annual administrative fees are not refundable if a contractor's certification(s) are suspended or revoked.**

	Sustaining Member	Patron Member	Non-Member
QP 2 Administrative Fee	\$2,100	\$2,400	\$2,700
Corrective Action Verification (QP1 and QP2 Together)	\$600	\$1,100	\$1,600

#### Audit Deposit

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Audit (QP 2 only)	\$1,500
Audit (same time as QP 1 audit)	\$1,000
*Outside U.S./Canada/Mex – Add	\$1,000

#### SSPC Policy

Audits are performed at cost. If your audit cost is less than your submitted audit deposit, SSPC will refund the difference to you. If the audit cost is more than your audit deposit, SSPC will bill you for the additional expenses. Program fees are non-refundable, regardless of the results of your evaluation. If you decide to withdraw your application prior to scheduling of the field evaluation, SSPC will withhold \$500 for application processing expenses. After six (6) months SSPC will return "non-responsive" and "inactive" applications to the contractor, minus a \$500 non-refundable administrative processing fee.

You must pay post-audit fees for QP 2 deficiency audits or additional audit expenses when they are due. Failure to pay in a timely manner will result in a six-month suspension from the program and public notification of your suspension. If you do not pay the fees after the suspension period, you will be de-certified and have to reapply for QP 2 certification. When re-applying, you will have to pay all applicable fees and all past due fees.

#### V. Submittal Procedure

Help SSPC staff to process your application quickly and efficiently by submitting all of the following items with your application:

- Type or clearly print all entries on the application form.
- Be certain to answer all items on the application accurately and completely.
- Send the original and one copy of the application package to SSPC. We suggest you keep a copy on hand for your use at the on-site audit.
- Clearly identify the five items of required information:
- Work History (Item 4),
- Competent Person Training and Experience (Item 5),
- Worker Safety and Health Program (Item 7),
- Environmental Compliance Plan (Item 8), and
- Enforcement (Item 9).
- Secure all pages to minimize the chance of loss or separation.
- Determine the non-refundable certification fee using the schedule in Section V. Make your check payable to SSPC Painting Contractor Certification Program (QP 2).
- Mail the application and required submittals to:

SSPC: The Society for Protective Coatings  
 Attn: Certification Manager  
 40 24<sup>th</sup> Street, 6<sup>th</sup> Floor  
 Pittsburgh, PA 15222

## **VI. Evaluation Process**

### **A. Qualifications and Procedures**

SSPC evaluates your firm based on the current version of SSPC-QP 2, "Standard Procedure for Evaluating the Qualifications of Painting Contractors to Remove Hazardous Paint."

Audits are performed yearly and usually require time at an active job-site and time in the headquarter offices. During the office and on-site visits the auditor will confirm the data you submitted with your application, interview key supervisory personnel and selected employees, observe and rate your company's organization and operation, and examine and rate your equipment and facilities.

At the conclusion of the site visit, the auditor will schedule an exit interview with your supervisory or management personnel. In that interview, the auditor will point out items rated less than 2, and items rated with a 2 that require a corrective action report (CAR). (See Section XI, "Definitions and Explanations," for details about scoring.) The auditor will then fill out a deficiency schedule that a company representative must sign. Your signature confirms that the auditor has made you aware of any audit findings; it does not mean you agree with them. If you do not sign the deficiency schedule, SSPC will revoke or deny certification.

### **B. Scheduling and Canceling an Audit**

SSPC and you must mutually agree on a time or time frame for the initial audit. After confirming the date/time frame in writing or verbally, the SSPC auditor will visit your company's office and suitable job site(s). Once the audit is scheduled, if you cancel it, request a change in the date, or fail to make the job site selected by SSPC available for auditing, you are responsible for all expenses incurred by SSPC due to the cancellation.

### **C. Determination of Status**

Following the audit, the SSPC program administrator, makes the final decision regarding your certification status. SSPC confers certification if you achieved scores of 3 in all 9 evaluation items. SSPC denies certification if you received scores of 2 on more than 4 items that require written corrective action within 90 days of notification of the audit results. You will receive QP 2 certification if you submit a corrective action plan and SSPC accepts it. SSPC also denies certification if you achieved scores of 1 on one or more items, which could require a follow-up audit to confirm that you have implemented acceptable corrective actions.

Failure to cooperate with the SSPC auditor or failure to provide access to information, personnel or an active industrial structure job site, shall be sufficient cause for denial, suspension or revocation of your company's certification status.

### **D. 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.

- 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).
- 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 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.
- 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).
- The final option for the Contractor wishing to continue with the appeal is to utilize the existing Disciplinary Action Criteria (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 above to appeal a suspension resulting from a failed audit.

Customers will be given an opportunity to comment specifically on your company's performance. All owner replies will be treated as confidential, and will be used only as a component in determining certification reconfirmation. Failure to pass any announced or unannounced audit may be cause for suspension or revocation of your company's QP 2 certification status.

## **VII. How to Maintain QP 2 Certification**

To maintain uninterrupted certification status, you must reapply for certification annually. You must submit a maintenance application, a signed internal audit report affidavit, a list of hazardous paint removal jobs in progress and/or completed since your last evaluation, copies of any changes to your compliance programs, and the appropriate fee by January 15 each year. The necessary forms and applications can be found on SSPC Online at [www.sspc.org](http://www.sspc.org). Click on "certification" and follow the appropriate links.

### **Renewal Applications**

SSPC will send a registered letter approximately 60-90 days before your submittal is due 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. You are also responsible for submitting your application when due regardless of whether SSPC sends you a reminder notice.

Once you have reapplied, the annual evaluation (at an industrial structure job site and possibly at your office) 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. 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.

QP 2 certification status of contractors who do not have any active hazardous paint removal projects under contract at the time renewal of their QP 2 certification is due will be handled as follows: To remain qualified for a specific qualification category, the auditor must observe the contractor performing work which meets the requirements of that category at least once in the 48 months following initial qualification, or the contractor's last QP 2 job-site audit, provided the contractor complies with all other QP 2 requirements.

During the 48 months after initial qualification, the contractor who doesn't have an active hazardous paint removal job to present when up for renewal shall give SSPC 60 days notice of all hazardous coating removal projects prior to starting work. In addition, the contractor is subject to scheduled or unannounced follow-up audits at the discretion of SSPC and at the contractor's expense. If SSPC fails to visit the project after being given sufficient notice, the contractor shall be considered to fulfill the audit requirements for the selected category, provided the written and photographic documentation reviewed by the auditor confirms conformance with QP 2 requirements. SSPC will give the contractor the requested category of certification. This does not preclude a visit to the job site by the auditor at a later time, at the contractor's expense, to verify compliance with QP 2 standards at the job site.

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.]

Failure to maintain QP 1 Certification automatically suspends QP 2 Certification.

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.

- The contractor is given 45 days from notification to make corrective actions and be re-audited,
- The contractor is asked to return original certificates, and
- 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 list of QP certified contractors (<http://www.sspc.org/qp-programs/qp-programs-home/>) and notice of suspension posted on the SSPC web site. 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 list of QP certified contractors.

**Important Note:** 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) will be suspended from the program for 12 months following failure of the second audit. Audit failure is defined as one or more Major Deficiencies.

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

## **VIII. Special Provisions**

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

SSPC certified contracting firms must notify the SSPC Program Administrator within 30 days of any major organizational changes. Examples of a major change include, but are not limited to, the following:

- change in ownership
- partnership/joint venture
- change in executive management (e.g. President, C.E.O; General Manager)
- declaration of bankruptcy
- Relocation of main or branch business offices or opening of new branch offices

When notifying SSPC, include specific details about the change(s), a revised organizational and responsibility chart, the effective dates of the change(s), and names of officers of the company. SSPC cannot begin the process of considering transferring certification status to a newly organized company until you provide all this information.

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

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

A company with a name change must certify in writing that it will assume responsibility for any disciplinary actions or violations of federal, state and local regulations. In addition, SSPC considers any violations of the DAC program (e.g., written complaints for owners or critical faults) by the company under any previous names to be part of the new firm's record.

SSPC reserves the right not to transfer certification to a newly organized company.

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

Failure to pay all fees in a timely manner can 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 business days to the final (second) notice of non-payment. It will also withhold certification for initial and annual applicants who pass the evaluation until the firm pays all fees.

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

Any authorized owner representative who hires a QP 2 certified painting contractor could file a formal complaint, if the contracting firm does not practice QP 2 certification procedures. The contractor may respond to the complaint by submitting information supporting his procedures 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 requirements. The contractor shall evaluate and select subcontractors based on their ability to provide products/service in accordance with the contract and PCCP 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 1 and QP 2 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 the QP 2 Application**

You are responsible for the accuracy and completeness of the regulatory citation history information that you submit to SSPC with the application. Failure to do so will delay the application or result in a disciplinary action, or if the company is already certified result in suspension of its certification.

#### **G. Administrative Suspension & 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, or renamed company must submit 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) any significant degree of ownership, management or control."

### **IX. Random Audit Program (RAP)**

The Random Audit Program (RAP) is designed to reward QP 2 contractors that are in good program standing. RAP allows the contractor's name to be placed in a lottery type selection that determines who is audited during that calendar year. The contractors that are randomly picked are audited, while all others are not. Aside from the obvious benefit of not undergoing an audit, all contractors approved for RAP also have relief from audit fees while in the program. The program cycle is 3 years. The fourth year requires the contractor to pass a full audit in order to be eligible for a new 3-year RAP term.

#### **Eligibility for RAP**

To be eligible for RAP, a contractor must first have passed their initial audit and the following 2 annual audits. Second, during the previous 3 audits, none of the QP 1 critical items should have been rated less than "2" - or - for non-critical items, have received more than 4 ratings less than a "2", and the QP 2 audits should not have resulted in a major Corrective Action Report - or - more than 4 minor Corrective Action Reports. Third, the company should have no major organizational changes in the last 3 years of certification. You may change the company name, since SSPC does not consider it a major change, but you must meet the criteria set out in the part A of this section. Fourth, the contracting company establishes a record free of disciplinary actions, defined by the Disciplinary Action Criteria (DAC).

#### **Loss of Eligibility for RAP**

A contractor loses eligibility for RAP for the following reasons:

1. Failure to pass any certification or random audit
2. Major organizational change to the contractor's firm (see part 2 in this section)
3. Any SSPC disciplinary action issued (Warning, Probation, Suspension)
4. Voluntary discontinuation or disruption of certification by the contractor
5. Declaration of Bankruptcy

#### **Restoration of Eligibility**

A contractor restores his eligibility by successfully completing a new 3-year term in the regular QP 2 certification programs, and by passing a special audit after a major organizational change.

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

A contractor is subject to random audit in any of the three years that it is in the random audit program. The contractor must also 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.

### **X. Scoring Criteria**

The **rating of 1**, (aka 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**, (aka 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 that 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 (Corrective Action Plan) 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 submissions 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.”